

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

MODERN PLATING CORPORATION,)	
Petitioners,)	
)	
v.)	PCB 26-31
)	(Permit Appeal- RCRA)
)	
ILLINOIS ENVIRONEMNTAL)	
PROTECTION AGENCY)	
Respondent.)	

NOTICE OF FILING

TO: Don Brown, Clerk of the Board
Illinois Pollution Control Board
60 East Van Buren St., Suite 630
Chicago, IL 60605
don.brown@illinois.gov

Melanie Jarvis, Deputy Chief Counsel
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, Illinois 62794-9276
melanie.jarvis@Illinois.gov

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the attached PETITION TO APPEAL ILLINOIS ENVIRONMENTAL PROTECTION AGENCY's FINAL PERMIT AND REQUEST FOR STAY; APPEARANCES OF LAWRENCE W. FALBE AND RACHAEL BRUKETTA; and a CERTIFICATE OF SERVICE, copies of which are herewith served upon you.

Dated: February 3, 2026

/s/ Rachael Bruketta
Rachael Bruketta

Lawrence W. Falbe
Ill. Atty. Reg. No. 06224888
Rachael Bruketta
Ill. Atty. Reg. No. 6344170
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**APPEARANCE OF LAWRENCE W. FALBE
AND CONSENT TO E-MAIL SERVICE**

I, Lawrence W. Falbe, hereby file my appearance in this proceeding, on behalf of MODERN PLATING CORPORATION, and authorize the service of documents on me by email in lieu of receiving paper documents in the above-captioned proceeding. My email address to receive service is as follows:

falbe@millercanfield.com

Dated: February 3, 2026

/s/ Lawrence W. Falbe
Lawrence W. Falbe
Ill. Atty. Reg. No. 06224888
Miller, Canfield, Paddock and Stone, P.L.C.
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Attorney for Modern Plating Corporation

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**APPEARANCE OF RACHAEL BRUKETTA
AND CONSENT TO E-MAIL SERVICE**

I, Rachael Bruketta, hereby file my appearance in this proceeding, on behalf of MODERN PLATING CORPORATION, and authorize the service of documents on me by email in lieu of receiving paper documents in the above-captioned proceeding. My email address to receive service is as follows:

bruketta@millercanfield.com

Dated: February 3, 2026

/s/ Rachael Bruketta
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Attorney for Modern Plating Corporation

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CERTIFICATE OF E-MAIL SERVICE

I, the undersigned, certify that on this 3rd day of February, 2026:

I have electronically served a true and correct copy of the attached Petition to Appeal Illinois Environmental Protection Agency’s Final Permit and Request for Stay and Appearances of Lawrence W. Falbe and Rachael Bruketta by electronically filing with the Clerk of the Illinois Pollution Control Board and by e-mail upon the following persons:

TO: Don Brown, Clerk of the Board	Melanie Jarvis, Deputy Chief Counsel
Illinois Pollution Control Board	Illinois Environmental Protection Agency
60 East Van Buren St., Suite 630	P.O. Box 19276
Chicago, IL 60605	Springfield, Illinois 62794-9276
don.brown@illinois.gov	melanie.jarvis@Illinois.gov

My e-mail address is bruketta@millercanfield.com

The number of pages in the e-mail transmission is 572.

The e-mail transmission took place before 5:00 p.m on the date of February 3, 2026.

/s/ Rachael Bruketta
Dated: February 3, 2026

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

MODERN PLATING CORPORATION,)	
Petitioners,)	
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)	(Permit Appeal- RCRA)
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ILLINOIS ENVIRONEMNTAL)	
PROTECTION AGENCY)	
Respondent.)	

**PETITION TO APPEAL ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S
FINAL PERMIT AND REQUEST FOR STAY**

Pursuant to Section 40(a)(1) of the Illinois Environmental Protection Act (the "Act"), 415 ILCS 5/40(a)(1), and 35 Ill. Adm. Code 105.200 *et seq.*, Petitioner, Modern Plating Corporation ("Modern" or "MPC"), submits this petition to appeal the Final Renewed Resource Conservation and Recovery Act Hazardous Waste Management Post-Closure Permit ("Final Renewed Permit") issued by Respondent, Illinois Environmental Protection Agency ("Illinois EPA" or "Agency"), on September 30, 2025.

I. PETITION FOR APPEAL

A. ISSUES RAISED ON APPEAL

1. Illinois EPA's abrupt change in how it calculates MPC's financial assurance obligations in the Final Renewed Permit is arbitrary and capricious because there was no apparent regulatory change or factual change supporting the new calculations. Therefore, Illinois EPA's attempt to change the calculation methodology should be disallowed.

2. Illinois EPA should be equitably estopped from imposing extended financial assurance requirements described in the Final Renewed Permit. Over the past 15 years, Illinois EPA has represented that MPC's financial assurance would be reduced annually as the unit's 30-year post-closure care period elapsed. MPC reasonably relied on these historical reductions, and

the company will suffer substantial hardship from increased costs to satisfy substantially increased financial assurance obligations.

B. BACKGROUND

3. Over the past 15 years, Illinois EPA has represented that MPC's financial assurance obligation would be reduced annually as the unit's 30-year post-closure care period elapsed. MPC reasonably relied on these historical reductions, and the company will suffer substantial hardship from increased costs to satisfy substantially increased financial assurance obligations.

4. MPC's Corrective Action Management Unit ("CAMU") is located at 701 South Hancock Avenue, Freeport, Stephenson County, Illinois.

5. MPC owns approximately nine acres at this location with approximately 1.2 acres used for managing hazardous waste contained in a CAMU.

6. The initial RCRA post-closure permit ("RCRA Permit") was issued to MPC to construct, operate, and provide post-closure maintenance for the CAMU. The RCRA Permit was issued on April 11, 2000, with an effective date of May 16, 2000, and an expiration date of May 16, 2010. *See Exhibit A.*

7. The initial post-closure care period for the CAMU began on August 6, 2001, the date that MPC submitted the closure certification to Illinois EPA. Pursuant to this Board's regulations, the initial post-closure care period must continue for thirty (30) years after that date. Thus, the initial post-closure care period for the CAMU continues until August 6, 2031.

8. Section I(I)(2) of the RCRA Permit provided that MPC must meet the post-closure financial assurance requirements of 35 Ill. Adm. Code 724.245. The amount of the post-closure financial assurance must be sufficient to cover the long-term care costs of the CAMU.

9. In the initial RCRA Permit, the financial assurance requirements were determined by multiplying the annual post-closure cost estimate by the number of years of post-closure care required for the unit.

10. The initial RCRA Permit calculated the unit's annual post-closure care costs at \$25,840 (subject to inflation adjustments) for the thirty (30) years of the post-closure care period. *See Exhibit A at Section I(I)(2).*

11. MPC has met its post-closure care financial assurance obligations by maintaining a Letter of Credit, pursuant to 35 Ill. Adm. Code 724.245(d).

12. On May 7, 2009, Illinois EPA modified MPC's RCRA Permit ("the 2009 Permit Modification"). Illinois EPA explained in the 2009 Permit Modification that MPC was approved to multiply the annual post-closure cost in the current year dollars by the number of years left in the 30-year post closure care period. The annual post-closure care cost estimate in the 2009 Permit Modification was \$17,050. Therefore, the Agency concluded that, "there are 22 years remaining . . . the total amount of post-closure care financial assurance that should be required of MPC in the revised permit is $\$17,050 \times 22 \text{ years} = \$375,100$ (2008 dollars)." *See Exhibit B, Attachment 1: Summary of Changes to RCRA Post-Closure Permit.*

13. Specifically, Section II(G)(4) in the 2009 Permit Modification says, "[MPC] is allowed to calculate financial assurance based on the number of years **remaining** in the post-closure care period by the annual post-closure cost estimate that is revised each year per Conditions II.G.2 and G.3. above. If the permittee chooses to modify the financial assurance in this way, a permit modification request to do so must be submitted on or before October 1st of each year with the updated post-closure cost estimate and financial assurance required in Condition II.G.3. above." *See Exhibit B at Section II(G)(4).*

14. MPC has submitted annual Class 1* permit modification requests to Illinois EPA from 2009 through 2025. In each annual permit modification request, MPC's financial assurance requirement was calculated by multiplying the annual post-closure care cost estimate by the number of years remaining in the initial 30-year post-closure care period. *See* Exhibit C.

15. Illinois EPA has accepted MPC's annual permit modification requests and the company's reduction of its financial assurance obligation proportionate to the time remaining in the initial 30-year post-closure care period.

16. Illinois EPA issued MPC a renewed 10-year RCRA Permit on June 9, 2011, with an effective date of July 7, 2011, and an expiration date of July 7, 2021 ("the 2011 Renewed Permit"). Section II(F)(4). of the 2011 Renewed Permit says, "[MPC] is allowed to calculate the amount of financial assurance that is required each year by multiplying the number of **years remaining** in the post-closure care period by the annual post-closure cost estimate that is revised each year...." *See* Exhibit D at Section II(F)(4).

17. On January 8, 2021, MPC submitted a RCRA Part B permit renewal application to Illinois EPA for a 10-year renewal of the RCRA Permit for the final 10 years of the unit's initial post-closure care period.

18. On September 30, 2025, Illinois EPA issued the Final Renewed Permit to MPC. The permit effective date was November 4, 2025, and has an expiration date of November 4, 2035. The Final Renewed Permit requires MPC to maintain a rolling 30-year financial assurance amount a full 30-year post-closure care period. *See* Exhibit E at Section II(G)(2).

19. Illinois EPA did not provide an explanation for how it calculated the modified financial assurance amount in the Final Renewed Permit.

20. In other words, Illinois EPA took five years to respond to MPC's 2020 permit renewal application and then the Agency issued the Final Renewed Permit that abruptly changed MPC's financial assurance obligations to a rolling 30-year requirement, while only five years remain on the initial post-closure care period. Illinois EPA's new method of calculating the required financial assurance contradicts the method the Agency has used for the past 15 years, under which MPC's financial assurance liability has been annually reduced proportionate to the amount of time left in the initial post-closure care period so that MPC's financial assurance liability did not drastically exceed the post-closure care requirements.

21. Illinois EPA's new method of calculating MPC's financial assurance obligation for a rolling 30 years will cost MPC over \$505,000 more than the current calculation of proportionately reducing MPC's financial assurance obligation by calculating the annual cost estimate by the number of years remaining in the unit's post-closure care period. *See Exhibit F.*

22. MPC has not yet submitted a permit modification to extend the post-closure care period beyond the initial 30-year post-closure care period that ends August 6, 2031, and for which a modification is not due until August 6, 2030.

II. ARGUMENTS

A. **Illinois EPA's Imposition of a Rolling 30-Year Post-Closure Care Financial Assurance Requirement Was Arbitrary and Capricious.**

23. MPC has not yet submitted a permit modification to extend the post-closure care period beyond the initial 30-year post-closure care period that ends August 6, 2031, and for which a modification is not due until August 6, 2030.

24. The Final Renewed Permit requires MPC to satisfy a rolling 30-year financial assurance obligation despite that, annually for approximately 15 years, the Agency has reduced

MPC's financial assurance obligation. This sudden imposition of a new rolling 30-year financial assurance obligation is arbitrary and capricious, and should be disallowed.

25. Agency action is arbitrary and capricious if the agency: (1) relies on factors which the legislature did not intend for the agency to consider; (2) entirely fails to consider an important aspect of the problem; or (3) offers an explanation for its decision which runs counter to the evidence before the agency, or which is so implausible that it could not be ascribed to a difference in view or the product of agency expertise. *County of Will v. Pollution Control Board*, 2019 IL 122798 ¶¶ 44 -45, 135 N.E.3d 49, 61, 434 Ill.Dec. 165,177 (2019) (citing *Greer v. Illinois Housing Development Authority*, 122 Ill. 2d 462, 505-506, 524 N.E.2d 561, 581, 120 Ill. Dec. 531, 551 (1988)). While an agency is not required to adhere to a certain policy or practice forever, sudden and unexplained changes have often been considered arbitrary. *Greer*, 122 Ill. 2d 506 (citing 2 C. Koch, *Administrative Law & Practice* § 9.6, at 101 (1985)). Thus, the agency must offer a satisfactory explanation for its action, including a rational connection between the facts found and the choice made, and cannot simply ignore an important aspect of the problem. *Ohio v. Environmental Protection Agency*, 603 U.S. 279, 280, 144 S. Ct. 2040, 2044 (2024) (citing *Motor Vehicle Mfrs. Assn. of United States, Inc. v. State Farm Mut. Automobile Ins. Co.*, 463 U.S. 29, 43 (1983)).

26. Here, this Board's regulations provide that post-closure care for each hazardous waste management unit, subject to the requirements of Sections 724.217 through 724.220, must begin after completion of closure of the unit and continue for 30 years after that date. 35 Ill. Adm. Code 724.217(a)(1). While subsection (2)(B) of 35 Ill. Adm. Code 724.217(a) allows for an extension of the post-closure care period, an extension occurs only if this Board has found that the extended period is necessary to adequately protect human health and the environment.

Additionally, 35 Ill. Adm. Code 724.244(a)(2) provides that a unit's post-closure care cost estimate is calculated by multiplying the annual post-closure cost estimate by the number of years of post-closure care required under 35 Ill. Adm. Code 724.217.

27. MPC's initial post-closure care period for the CAMU began on August 6, 2001, the date of closure completion of the final portion of the unit. Pursuant to 35 Ill. Adm. Code 724.217(a)(1), the initial post-closure care period runs through August 6, 2031. This means that, starting August 6, 2001, MPC has counted downward from 30 each year to calculate its financial assurance obligations—therefore, today, after approximately 25 years of the initial post-closure period have passed, MPC's remaining period of post-closure care is five years and its **annual post-closure cost estimate is multiplied by five.**

28. This calculation of MPC's post-closure care financial assurance obligation has been accepted by Illinois EPA for approximately 15 years so that MPC is not subject to disproportionate financial liability when few years remain in the unit's initial post-closure care period. The Agency has historically maintained that MPC should not be required to carry the fees associated with a Letter of Credit covering 30 years' financial assurance liability (which increases with inflation) as the years of the unit's post-closure care decline. In fact, as affirmed in the 2009 Permit Modification, MPC has routinely requested, and Illinois EPA has granted, annual reductions to MPC's financial assurance liability so that the company's financial assurance obligations (and associated fees) are proportionate to the number of years that remain in the unit's initial post-closure care period. *See Exhibit C.*

29. However, on September 30, 2025, when Illinois EPA issued the Final Renewed Permit to MPC, the company's financial assurance obligations had been changed to a rolling 30-year requirement. The new calculation deviates from the Agency's 15-year precedent of reducing

MPC's financial assurance obligation, and will cost MPC over \$505,000 more than the current calculation of proportionately reducing MPC's financial assurance obligation.

30. Moreover, there has been no apparent regulatory change that authorizes Illinois EPA revising the calculation for MPC's financial assurance obligations. To date, the only reasoning given for this calculation change was in Illinois EPA's August 5, 2025 Response to Froth Infrastructure & Environment, LLC's Comments on the Draft RCRA Hazardous Waste Management Post-Closure Permit ("Response to Comments"), where the Agency explained that "this prorated-reduction...did not take into consideration the financial risk to the Illinois EPA or citizens to Illinois..." See Exhibit E, Response to Comments at 9.

31. Though the Agency now asserts that its previous prorated reductions were incorrect, it has not provided evidence of any regulatory or factual changes that would explain how it may suddenly change its calculation and impose a new, rolling 30-year financial assurance obligation on MPC.

32. While the unit's post-closure care period may eventually be extended, which would alter the financial assurance obligations to be proportionate to the extended number of years of post-closure care required, this Board has not extended the unit's post-closure care period, nor has MPC applied for a permit modification to extend the period. In fact, MPC has almost five years to submit the permit modification request for an extension. Illinois EPA recognized this fact in Section II(C)(2) of the Final Renewed Permit, which provides:

On or prior to August 6, 2030 (one year before August 6, 2031), the Permittee must submit a Class 2 permit modification request to the Illinois EPA in accordance with 35 IAC 703.241(a)(2) and 35 IAC 703, Appendix A, E.2, to extend the post-closure care period of the CAMU for an additional 30-year period or until such time as no unacceptable risks to human health and the environment are present at the CAMU, as determined by the Illinois EPA.

33. Therefore, *only* after MPC submits a permit modification request, or if this Board has found that an extended post-closure care period is necessary, would the post-closure care period and its annual post-closure cost estimate extend beyond August 6, 2031. Until that time, MPCs financial assurance obligation should continue to be multiplied by the number of years remaining in the unit's initial post-closure care period.

34. MPC is not uniquely situated with Illinois EPA's sudden imposition of a rolling 30-year financial assurance requirement. The Agency is also attempting to impose such changed financial assurance requirements on Waste Management of Illinois, Inc. ("Waste Management") and BFI Waste Systems of North America, LLC ("BFI"). Waste Management and BFI have filed permit appeals and have petitioned this Board for review.¹

35. In fact, in the course of the BFI appeal, when the Illinois EPA was asked about the sudden imposition of a rolling 30-year financial assurance obligation, the Agency admitted that it was not aware of any rulemaking that has instructed the Agency to now impose a rolling 30-year financial assurance obligation nor was it aware of any formal instructions from the United States Environmental Protection Agency to change financial assurance obligations for hazardous waste unit facility owners or operators with RCRA Permits.²

36. Therefore, without any clear evidence supporting the Agency's sudden imposition of a rolling 30-year financial assurance obligation, the clear presumption is that the Agency has acted arbitrarily and capriciously in changing MPC's financial assurance calculations before the end of the 30-year post-closure period. Such action should not be condoned by this Board, and Illinois EPA should be ordered to amend the Final Renewed Permit to revert to the original financial assurance calculation methodology.

¹ BFI's Petitions are in PCB Nos. 25-12; Waste Management's Petition is PCB No. 25-9.

² Petitioner's Objection to Illinois EPA's Motion to Consolidate, PCB No. 25-12, Exhibit A at 68-79.

B. Illinois EPA's Imposition of a Rolling 30-Year Financial Assurance Obligation Should be Barred by Equitable Estoppel.

37. Illinois EPA should be equitably estopped from imposing a rolling 30-year financial assurance obligation on MPC because Illinois EPA's practice over the past approximately 15 years has been to annually reduce MPC's financial assurance liability proportionate to the time remaining in the current, initial post-closure care period. Accordingly, MPC should be granted continuous annual reductions in its financial assurance obligations through August 6, 2031, when the current, initial 30-year post-closure care period ends.

38. Under Illinois law, the doctrine of equitable estoppel applies when the following factors are present: (a) words or conduct by the party against whom estoppel is alleged constitutes a misrepresentation or concealment of material facts; (b) knowledge by the party against whom estoppel is alleged that representations made were untrue; (c) the party claiming estoppel did not know that the representations were untrue when they were made and when they were acted upon; (d) the other party intended or reasonably expected that the party claiming estoppel would act upon the representations; (e) the party asserting estoppel must have reasonably relied or acted upon the representations or conduct of the other party in good faith to their detriment; and (f) the party asserting estoppel must show that they will suffer substantial prejudice if the other party is permitted to deny the truth of their representations. *See Trossman v. Philipsborn*, 373 Ill. App. 3d 1020, 1041, 869 N.E.2d 1147, 1165 (2007) (citing *Geddes v. Mill Creek Country Club, Inc.*, 196 Ill. 2d 302, 313-314 (2001)). Additionally, while equitable estoppel against a public entity is generally disfavored, the doctrine is appropriate against a public entity where substantial reliance has occurred, and it would be inequitable to permit the public body to retract what it had previously done. *See Jack Bradley, Inc. v. Department of Employment Sec.*, 146 Ill.2d 61, 81, 585 N.E.2d

123, 132, 165 Ill. Dec. 727, 736 (1991) (citing *Hickey v. Illinois Central R.R. Co.*, 35 Ill.2d 427, 448–49, 220 N.E.2d 415, 426 (1966)).

39. Each of these factors is met by Illinois EPA's sudden change to its long-standing practice of reducing MPC's financial assurance requirements proportionate to the time remaining in the post closure care period, as follows:

a) Words or conduct by the party against whom estoppel is alleged constitute a misrepresentation or concealment of material facts

40. Illinois EPA's historical annual reductions of MPC's post-closure care financial assurance liability were a misrepresentation or concealment of material fact that, per the Agency's admission, it was not accurately considering the financial risk for the unit's post-closure care, cost estimates, and financial assurance. Illinois EPA's consistent reductions in MPC's financial assurance obligations for the past 15 years of the unit's post-closure period has led MPC to reasonably believe that the Agency would continue to reduce its financial assurance obligations each year. Illinois EPA's new position constitutes a misrepresentation of its long-standing approach that misled MPC to believe that the prior reductions in financial assurance obligations would continue.

b) Knowledge by the party against whom estoppel is alleged that representations made were untrue

41. Illinois EPA knew of its longstanding practice of reducing MPC's financial assurance obligations and was aware that MPC relied on these reductions to its post-closure care financial obligations. However, Illinois EPA admits that its past actions to reduce MPC's financial assurance obligations were incorrect. While Illinois EPA now claims that they did not previously consider the financial risk for the unit's post-closure care, cost estimates, and financial assurance,

the Agency did not communicate to MPC that it might change its position, nor did MPC have notice that the Agency's prior conduct was misleading.

c) The party claiming estoppel did not know that the representations were untrue when they were made and when they were acted upon

42. MPC had no reason to know or to suspect that Illinois EPA's approximately 15-year history of annually reducing MPC's financial assurance obligations would suddenly change. While Illinois EPA now asserts that it did not previously consider the financial risks of the CAMU, MPC had no reason to suspect or to know that Illinois EPA had failed to wholly consider these factors.

d) The other party intended or reasonably expected that the party claiming estoppel would act upon the representations

43. Illinois EPA's repeated annual reductions in MPC's financial assurance obligations over the past approximately 15 years reasonably led MPC to rely on these reductions as the company satisfied its financial assurance obligations through a Letter of Credit and planned its budgeting. Illinois EPA's conduct over the past 15 years demonstrated that it intended to reduce MPC's financial assurance obligations for the five years remaining in the initial post-closure care period, and these actions led MPC to rely on continued reductions to its financial assurance obligations.

e) The party asserting estoppel must have reasonably relied or acted upon the representations or conduct of the other party in good faith to their detriment

44. MPC reasonably relied and acted on Illinois EPA's representations that it would continue to annually reduce the company's financial assurance obligations for the remaining five years of the post-closure care period and has structured its finances around this reliance. While MPC has satisfied its financial assurance obligations by maintaining a Letter of Credit, MPC has structured the unit's post-closure care expenditures and planned its company budget in reliance on

the annual reductions that have occurred for the past approximately 15 years. Illinois EPA's new method of calculating MPC's financial assurance obligation for a rolling 30-years will cost MPC over \$505,000 more than the current calculation of proportionately reducing MPC's financial assurance obligation.

f) The party asserting estoppel must show that they will suffer substantial prejudice if the other party is permitted to deny the truth of their representations

45. MPC will suffer substantial prejudice if Illinois EPA is permitted to impose the rolling 30-year financial assurance obligation. Instead of continuing to subtract annual post-closure cost estimates (approximately \$39,000 annually in 2025 dollars) from MPC's financial assurance obligation for the next five years, Illinois EPA demands that MPC maintain a rolling 30-year financial assurance liability. This restructured financial assurance obligation means that, as the unit's annual cost estimates increase each year with inflation, and roll for 30 years in perpetuity, MPC's financial assurance obligations increase significantly. MPC will pay over \$505,000 more in fees for its bank to assure the increased Letter of Credit for a rolling 30 years. MPC will suffer significant financial harm if it is now required to increase its financial assurance to meet a rolling 30-year financial obligation.

46. Each of the equitable estoppel factors are met by Illinois EPA's sudden change to its long-standing practice of annually reducing MPC's financial assurance obligation proportionate to the time remaining in the unit's post-closure period, which MPC has relied upon to determine its financial assurance liability and structure its finances accordingly. The Agency's sudden imposition of a rolling 30-year financial assurance obligation imposes a significant, unjustifiable financial burden on MPC. Therefore, Illinois EPA's imposition of a rolling 30-year financial assurance obligation should be barred by equitable estoppel.

III. CONCLUSION

For all of the foregoing reasons, Petitioner, Modern Plating Corporation, respectfully petitions this Board to: (a) order Illinois EPA to file the Agency record of decision with the Clerk in accordance with 35 Ill. Adm. Code 105.116; (b) stay Illinois EPA's September 30, 2025 Final Renewed Resource Conservation and Recovery Act Hazardous Waste Management Post-Closure Permit decision pending hearing on the instant petition; (c) hold a hearing to review the Agency's Final Renewed Resource Conservation and Recovery Act Hazardous Waste Management Post-Closure Permit decision; (d) find that the Illinois EPA's imposition of a rolling 30-year financial assurance obligation is arbitrary and capricious; (e) bar the Agency's actions on the principle of equitable estoppel; (f) void the Agency's September 30, 2025 Final Renewed Resource Conservation and Recovery Act Hazardous Waste Management Post-Closure Permit and order Illinois EPA to reissue a Final Renewed Permit with the correct financial assurance calculations; and (g) grant Petitioner such other and further relief as appropriate.

Dated: February 3, 2026

Respectfully submitted,

MODERN PLATING CORPORATION,
Petitioners.

/s/ Lawrence W. Falbe
Lawrence W. Falbe
Attorney for Petitioners

Lawrence W. Falbe
Ill. Atty. Reg. No. 06224888
Rachael Bruketta
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List of Exhibits

Exhibit A: Modern Plating Corporation's Initial RCRA Post-Closure Permit issued April 11, 2000 ("RCRA Permit")

Exhibit B: Illinois EPA's Modifications to Modern Plating Corporation's RCRA Post-Closure Permit issued May 7, 2009 ("the 2009 Permit Modification")

Exhibit C: Modern Plating Corporation's Annual Class 1* RCRA Permit Modification Requests

Exhibit D: Modern Plating Corporation's Renewed 10-Year RCRA Permit issued June 9, 2011 ("the 2011 Renewed Permit")

Exhibit E: Modern Plating Corporation's Final Renewed RCRA Post-Closure Permit issued September 30, 2025 ("Final Renewed Permit")

Exhibit F: Modern Plating Corporation's Financial Assurance Calculation: Current Method of Proportionate Reductions v. New Method Under 2025 Final Permit with 30-Year Rolling Obligation

EXHIBIT A



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

THOMAS V. SKINNER, DIRECTOR

217/524-3300

April 11, 2000

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CERTIFIED MAIL
P 344 306 060

Mr. Craig Skolrood, President
Modern Plating Company
701 South Hancock Avenue
Freeport, Illinois 61032-0838

Re: 1770200010 -- Stephenson County
Modern Plating Corporation
Log No. B-167
Admin. Record File

Dear Mr. Skolrood:

Enclosed is a RCRA Hazardous Waste Management Post-Closure permit for the Corrective Action Management Unit (CAMU) landfill at the Modern Plating Corp. facility. The final permit is based on the administrative record contained in the Agency's files. The contents of the administrative record are described in 35 Illinois Administrative Code (Ill. Adm. Code) Section 705.211. Read this document carefully. Failure to meet any portion of the permit could result in civil and/or criminal penalties.

Within 35 days after the notification of a final permit decision, the permittee may petition the Illinois Pollution Control Board to contest the issuance of the permit. The petition shall include a statement of the reasons supporting a review, including demonstration that any issues raised in the petition, were previously raised during the public comment period. In all other respects the petition shall be in accordance with the requirements for permit appeals as set forth in 35 Ill. Adm. Code Part 105. Nothing in this paragraph is intended to restrict appeal rights under Section 40(b) of the Environmental Protection Act (35 Ill. Adm. Code 705.212(a)).

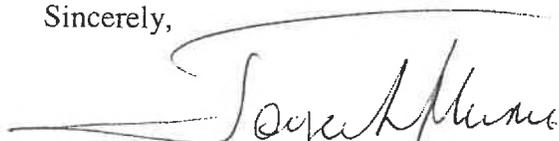
A copy of Illinois EPA's responses to comments on the Draft Permit issued on December 21, 1999, is also attached to this letter. Only Foth & Van Dyke (on behalf of Modern Plating Corp.) submitted comments on the Draft Permit. The Agency's responses were developed as a result of reviewing the comments submitted by Foth & Van Dyke dated February 10, 2000 and received by Illinois EPA on February 14, 2000. Revised pages to the application dated March 10, 2000 and April 5, 2000, and received on March 13, 2000 and April 6, 2000 were incorporated into the application. This information served to clarify issues in the application and did not result in changes to the conditions in the permit or the responses to comments.

GEORGE H. RYAN, GOVERNOR

Page 2

If you have any questions concerning this RCRA Post-Closure permit, please contact Rob Watson, P.E. at 217/524-3300.

Sincerely,



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

JLM:WRW\mils\002692S.WPD
WRW JHK JLM SMO

Attachments: Final RCRA Post-Closure Permit
IEPA's Response to Comments

cc: Harriet Croke, USEPA -- Region/V
Ron Meister, Foth & Van Dyke ✓

ATTACHMENT 1
RCRA POST-CLOSURE PERMIT

for

Modern Plating Corporation

1770200010
Log No. B-167



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

THOMAS V. SKINNER, DIRECTOR

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

RCRA POST-CLOSURE PERMIT

IEPA #1770200010 -- Stephenson County
Modern Plating Corporation
ILD #005 172 325
RCRA -- Administrative Record
RCRA Log No. B-167

Issue Date: April 11, 2000
Effective Date: May 16, 2000
Expiration Date: May 16, 2010

Owner

Lucille Miller
Modern Plating Corporation
701 South Hancock Avenue
P.O. Box 838
Freeport, Illinois 61032-0838

Operator

Craig Skolrood
Modern Plating Corporation
701 South Hancock Avenue
P.O. Box 838
Freeport, Illinois 61032-0838

A RCRA post-closure permit is hereby granted pursuant to the Resource Conservation and Recovery Act (RCRA), Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (IAC) 702, 703, 705, and 720 through 729 to Modern Plating Corporation (MPC) to construct, operate, and provide post-closure maintenance for a corrective action management unit (CAMU). Only remediation wastes generated during RCRA closure and/or corrective action activities at the Modern Plating facility shall be placed in the CAMU. The Modern Plating Corporation is located at 701 South Hancock Avenue in Freeport, Illinois.

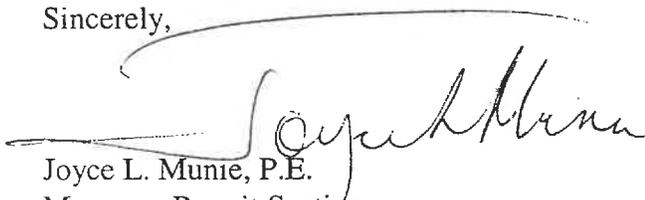
This permit is based on the representations made in the approved permit application dated December 1, 1999 and received December 2, 1999, the comments provided on the Draft Permit dated February 10, 2000 and received February 14, 2000, and revised pages to the application dated March 10, 2000 and April 5, 2000 and received March 13, 2000, and April 6, 2000. The permit consists of the conditions contained herein (including those in any attachments and appendices) and applicable regulations contained in the Illinois Environmental Protection Act and 35 IAC 702, 703, 705 and 720 through 729 in effect on the effective date of this permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter 111 ½, Section 1039) grants the Illinois Environmental Protection Agency the authority to impose conditions on permits which are issued.

GEORGE H. RYAN, GOVERNOR

Page 2

If you have any questions regarding this permit, please contact Rob Watson, P.E. at 217/524-3300.

Sincerely,



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

~~JLM~~ JHK
JLM:WRW\mils\002721S.WPD
WRW JLM SMO

cc: Harriet Croke, USEPA -- Region V
Ron Meister, Foth & Van Dyke

RCRA POST-CLOSURE PERMIT
MODERN PLATING CORP
FREEPORT, ILLINOIS

IEPA No. ID #1770200010

USEPA ID No. 005172325

Log No. B-167

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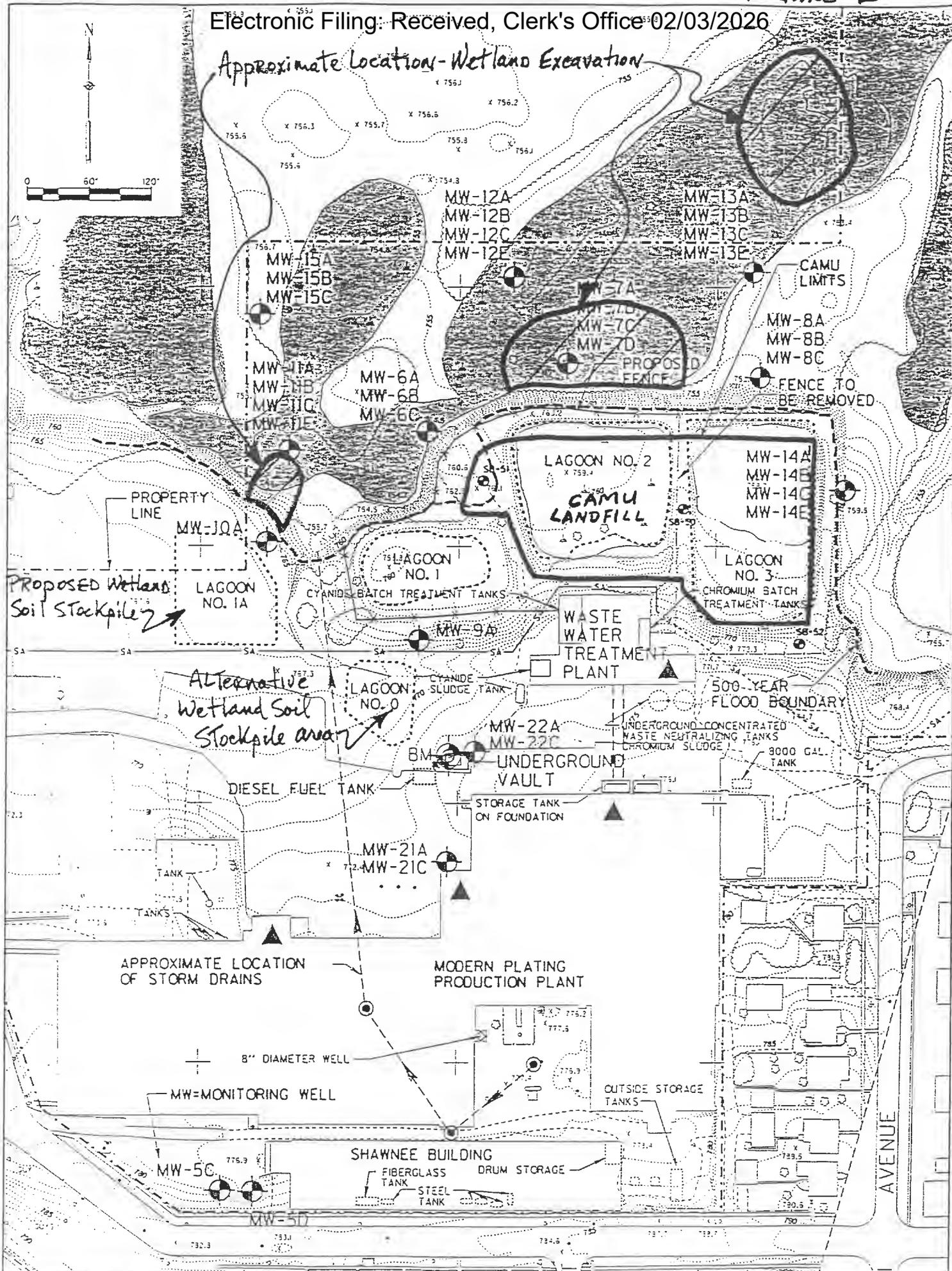
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LIST OF ATTACHMENTS

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A. Construction Certification Form & Instructions	2
B. Inspection Schedule	3
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D. Closure & Post Closure cost estimates	4
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Approximate Location - Wetland Excavation



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SECTION I

DESIGN, CONSTRUCTION, OPERATION, & CLOSURE of the CORRECTIVE ACTION MANAGEMENT UNIT

A. AUTHORIZATION OF CAMU

For the purpose of implementing remedies under 35 IAC 724.201, the Illinois EPA is designating a new unit at the Modern Plating facility as a Corrective Action Management Unit (CAMU), as defined in 35 IAC 720.110. The design, construction, operation, and maintenance of the CAMU shall be conducted in accordance with the approved permit application, the requirements contained in this permit, and the regulations at 35 IAC 724.652. Placement of remediation waste into or within a CAMU does not constitute land disposal of hazardous wastes. Consolidation or placement of remediation wastes into or within a CAMU does not constitute creation of a unit subject to minimum technology standards.

Approval of this RCRA permit for the CAMU does not constitute approval of the closure performance standards for the surface impoundments proposed in the permit application.

B. UNIT IDENTIFICATION

The CAMU shall be located north of the waste water treatment plant. The general location of the CAMU is shown in Figure 1 of this permit. Remediation wastes from the facility will be disposed in a landfill which will be constructed in the same location that Lagoons 2 and 3 currently occupy. Remediation wastes which can not be placed directly in the landfill, shall be placed in either Lagoon 1 or 3 during construction of the landfill. The CAMU landfill will cover about 1.2 acres and will hold remediation wastes generated from the closure and remediation of hazardous waste and solid waste management units at the Modern Plating facility. The permitted volume of the landfill is 17,610 cy (cubic yards) with a maximum volume of approximately 22,800 cy.

C. WASTE IDENTIFICATION

1. The Permittee is only allowed to place the following types of wastes generated during remediation of the on-site hazardous and solid waste management units in the CAMU: Electroplating Sludge (F006), soils contaminated with cadmium, chromium, cyanide,

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and trichloroethylene (F002), including soils from the Shawnee building, cyanide vault, wetlands areas, outfall pipeline areas, and any other areas where similar remediation wastes are located during the closure and corrective actions at the facility.

2. The Permittee is prohibited from placing wastes in the CAMU that are not included in Condition C.1 above without prior authorization from the Illinois EPA via a permit modification.
3. Wastes which contain free liquids as determined by the Paint Filter Liquids Test (Method 9095 in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods", EPA Publication No. SW-846, latest edition) shall not be placed in the CAMU Landfill. The determination of whether the waste contains free liquids shall be performed before the waste is placed in the CAMU Landfill.

D. DESIGN, CONSTRUCTION, AND OPERATING REQUIREMENTS

1. The Permittee shall construct, operate, and maintain the CAMU in accordance with the plans and specifications contained in the approved permit application and the conditions in this permit. Any changes to the CAMU described in the approved permit application shall be pre-approved by the Illinois EPA before they can be implemented by the permittee.
2. The horizontal extent and location of the CAMU is identified in Figure 1 of this permit. The CAMU shall not be constructed below elevation 757.0. The sumps in the CAMU shall not be constructed below elevation 753.5. The interior side slopes in the CAMU shall not be steeper than 3:1 (3 feet horizontal to 1 foot vertical). The slopes of the final cover on the CAMU shall not be steeper than 3:1 on the perimeter slopes constructed of contaminated soils, and not steeper than 6:1 for the areas covering sludge. The CAMU landfill shall be designed and constructed to achieve a minimum static slope factor of safety greater than or equal to 1.5 and a seismic factor of safety greater than or equal to 1.3. Any modification to these design parameters shall be the subject of a permit modification.
3. Prior to placement of the bottom component of the liner system (e.g. the GCL), the subbase soils under the CAMU shall meet all of the criteria specified in the approved permit application and this permit including the following:
 - a. A minimum of 1 foot of recompacted fine-grained soils.

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- b. The in place density of the soils shall be at least 95% of the maximum dry density as measured by the standard proctor test.
 - c. The moisture content of the soils shall be between -2% and +2% of the optimum moisture content (as determined by the Standard Proctor Test).
 - d. The surface of the subbase soils shall be rolled with a smooth drum roller to insure there are no ruts larger than 1 inch.
 - e. The top 6 inches of subbase soils which will be in contact with the GCL shall be free of all stones, sticks, dirt balls, or any other sharp objects larger than 1/4 inch in size.
4. The liner system on the bottom and sides of the CAMU shall be constructed of the following layers, described from the top to bottom:
- geocomposite drainage material (high density polyethylene (HDPE) drainage net sandwiched between two layers of geotextile material) with a minimum transmissivity of $3 \times 10^{-5} \text{ m}^2/\text{sec}$
 - 60 mil HDPE geomembrane (textured on both sides)
 - HDPE drainage net (geocomposite on the sideslopes) with a minimum transmissivity of $3 \times 10^{-5} \text{ m}^2/\text{sec}$
 - 60 mil HDPE geomembrane (textured on both sides)
 - geosynthetic clay liner (GCL)
5. The cover system on the top of the CAMU shall be constructed of the following layers, described from the top to bottom:
- 6 inches of topsoil (vegetative layer)
 - 18 inches of cover soil (rooting layer)
 - geocomposite drainage material (HDPE drainage net sandwiched between two layers of geotextile material)
 - 40 mil HDPE geomembrane (textured on both sides)
 - geosynthetic clay liner (GCL)
 - 6 inches of grading/venting layer
6. The leachate collection and removal system shall be designed and operated to ensure that the depth of leachate over the liner does not exceed more than 1 foot (30 cm). The leachate collection pump shall be automatically turned on when the leachate in the

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sump reaches an elevation of 757.0 feet as indicated on Drawing 11 in the approved permit application.

7. The GCL used as the bottom liner in the CAMU shall be a geotextile encased needle punched GCL that can withstand moisture adsorption without any loss of integrity.
8. The Geomembrane panels made of polyethylene resins shall be welded by double-tracked, fusion welding machines for all linear seams. Corners, butt seams and long repairs shall be fusion welded where possible. Extrusion or fusion welding shall be used for all other repairs, detail work and patches. Illinois EPA Bureau of Land Permit Section approval shall be obtained prior to use of any other welding method for either panel seaming, repairs or construction details.
9. The CAMU shall be constructed in accordance with the Construction Quality Assurance Plan in Appendix E and the Construction Specifications in Appendix Q, both in the approved permit application.
10. The Illinois EPA Bureau of Land Permit Section shall be notified anytime a deviation the design plans and specifications, or non-conforming work, is observed by the CQA personnel. This notification of the problem, its proposed resolution, and any proposed design change must be made prior to resuming work impacted by the deviation or non-conformance.
11. Remediation wastes shall be placed in the CAMU in accordance with the procedures specified in the approved permit application. Every effort shall be made to protect the liner materials on the bottom, sides and top of the CAMU during the construction, operation, and closure of the CAMU.
12. The Permittee shall provide groundwater monitoring for the CAMU in accordance with the approved permit application, and with Section III of this permit.

E. CONSTRUCTION CERTIFICATION

1. After construction of each cell, and prior to the placement of any waste in either of the two phases (cells) of the CAMU landfill, the permittee shall submit to the Illinois EPA, Bureau of Land, Permit Section and Rockford Regional Office by certified mail or hand delivery a Cell Completion Certification (CCC). The CCC shall include a completed Construction Certification Form from Attachment A of this permit, and a

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certification signed by the CQA officer, using the wording at 35 IAC 702.126(d), that the CAMU was constructed in accordance with the approved CQA plan. The CCC shall also contain an exception report (with drawings as necessary) that identifies any and all changes to the design or construction of the CAMU landfill specified in the approved permit application or this permit.

2. The permittee shall inform the IEPA Rockford Regional Office (in writing or by e-mail) no less than one week prior to the date the permittee anticipates completion of each cell in the CAMU landfill. Failure to comply with this condition voids Condition I.E.3 below. If this occurs, the permittee is prohibited from placing waste in a cell unless and until written approval for this action is received from the Illinois EPA.
3. If IEPA has not inspected the new cell and found it to be in compliance with the regulations and the permit within 4 working days from the date the Cell Completion Certification (CCC) required by Condition I.E.1 is received by IEPA, then the permittee may begin placing waste in the unit.
4. If IEPA's inspection of a landfill cell or review of the Cell Completion Certification (CCC) required in Condition I.E.1 above finds a landfill cell was not properly constructed, the IEPA will notify the permittee of this finding in writing or by e-mail within 4 working days from the date the CCC is received. The permittee shall not place waste in the cell until the deficiency identified during the inspection or review is corrected to the satisfaction of the IEPA.
5. Within 30 days after completing construction and placement of all waste in the two phases (cells) of the CAMU landfill, the permittee shall submit to the Illinois EPA, Bureau of Land, Permit Section by certified mail or hand delivery a Construction Certification Report from a qualified, registered professional engineer, demonstrating that the construction of the CAMU landfill meets the requirements of 35 IAC 724.652, the requirements in this permit, and the approved permit application. This report shall contain all of the information required in Attachment A. It shall also include a certification signed by the CQA officer, using the wording at 35 IAC 702.126(d), that the CAMU was constructed in accordance with the approved CQA plan.

F. INSPECTION OF CAMU

1. The Permittee shall inspect the components, structures, and equipment at the site in accordance with the Approved Permit Application and the inspection schedule in Attachment B of this permit.

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2. The date of the first inspection shall be on the effective date of this permit.
3. The Permittee shall continue to follow the inspection procedures in Condition F.1 until the closure certification for the CAMU is submitted to the Illinois EPA and the conditions for the post-closure care period in Section II of this permit are implemented.

G. CONTINGENCY PLAN

1. A release of hazardous waste or hazardous constituents from the CAMU Landfill shall constitute an incident which requires implementation of the Contingency Plan.
2. When the Contingency Plan is implemented, the permittee shall immediately notify either the local government official designated as the on-scene coordinator for that geographical area, or the National Response Center (using their toll free number 800-424-8803). The following information must be provided:
 - Name and telephone number of reporter;
 - Name and address of facility;
 - Time and type of incident (release, fire or explosion);
 - Name and quantity of material involved, to the extent known;
 - The extent of injuries, if any; and
 - The possible hazards to human health or the environment outside the facility.
3. Within 24 hours of implementation of the Contingency Plan, the Permittee shall also contact the Illinois Emergency Management Agency (IEMA), the Bureau of Land's Regional Office in Rockford, IL and the Permit Section (in addition to the other entities identified in the permit application).
4. Any incident associated with the CAMU Landfill which requires implementation of the contingency plan shall be recorded in the facilities operating record in an incident log which is maintained separate from the facility's other operating records. The incident log must include a copy of each incident report. In addition to the information identified in the approved application, the incident report must include, the cause of the release and the measures taken to correct the situation and prevent a recurrence.
5. Within sixty (60) days of the effective date of this permit, the Permittee shall provide documentation to the Agency of the agreements and arrangements made with local police and fire departments, hospitals, contractors, and state and local emergency response teams to familiarize them with the facility and actions needed in case of

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emergency. If necessary, documentation must be provided that any Agency identified in 35 Ill. Adm. Code 724.153(b) declined to enter an agreement or arrangement.

6. Within sixty (60) days of the effective date of this permit, the Permittee shall provide documentation (e.g. a copy of the cover letter) to the Agency that copies of the contingency plan have been sent to local police and fire departments, hospitals, contractors, and state and local emergency response teams to familiarize them with the facility and actions needed in case of emergency.

H. CLOSURE

1. The CAMU shall be closed in accordance with the approved permit application and the conditions in this permit.
2. If the cover system for the CAMU is not completed by November 1, 2000, the permittee shall submit a plan to protect the waste piles in lagoons 1 and 3 and/or the CAMU from the effects of the winter weather. This plan shall be provided as a modification to this permit no later than November 1, 2000.
3. The permittee shall prepare a survey plat indicating the location and dimensions of the CAMU and any other hazardous waste disposal units with respect to permanently surveyed benchmarks. This plat shall be prepared and certified by a professional land surveyor. The plat shall contain a note, prominently displayed, which states the owner's and operator's obligation to restrict disturbance of the CAMU in accordance with the applicable Subpart G regulations and shall state the following:
 - a. The corrective action management unit (CAMU) contains the remediation wastes generated during the closure of hazardous waste and solid waste units at the Modern Plating facility in accordance with an Illinois EPA approved closure plan (Log No. C-259-M-8).
 - b. The waste materials contained in the CAMU are considered RCRA hazardous wastes. They include electroplating sludges (F006), wastes with trichloroethylene (F002) and wastes containing cadmium, chromium, and cyanide.
 - c. Any fill material removed from the CAMU during future activities must be managed as a hazardous waste in accordance with 35 Ill. Adm. Code Subtitle G: Waste Disposal.

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The permittee shall file this survey plat with any local zoning authority, or authority with jurisdiction over local land use, and record with land titles, no later than the date the certification of closure of the CAMU is submitted to the Illinois EPA. The permittee shall submit the survey plat to the Illinois EPA Bureau of Land Permit Section with the certification of closure for the CAMU.

4. As part of the closure activities, Modern Plating shall:
 - a. Record a notation on the deed to the facility property, or on some other instrument which is normally examined during title search that will in perpetuity notify any potential purchaser of the property that:
 - (1) The waste material in the CAMU is considered a RCRA hazardous waste;
 - (2) Use of the area is restricted; and
 - (3) A survey plat and record of the type, location and quantity of waste material in the CAMU have been filed with the IEPA, the County Recorder, and any local zoning authority or authority with jurisdiction over local land use.
 - b. Attach the survey plat specified in Condition I.H.3 above to the deed for the subject property, or on some other instrument which is normally examined during title search, which will in perpetuity notify any potential purchaser of the property of the requirements set forth in the notation on the survey plat.
 - c. Submit the survey plat specified in Condition I.H.3 above to the County Recorder, any local zoning authority and any other authority over local land use.
5. When closure is complete the owner or operator shall submit to the Illinois EPA Bureau of Land Permit Section certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved permit application and the conditions in this permit. This certification must be received at the Illinois EPA within sixty (60) days after closure, or by January 1, 2001. These dates may be revised if Modern Plating finds that additional time is necessary to complete all required closure activities and demonstrates to the Illinois EPA that it is attempting to complete closure in a timely manner.

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The closure certification form provided as Attachment C must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity.

The Professional Engineering Practice Act of 1989 (225 ILCS 325/1 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he/she is a professional engineer must be registered under the Professional Engineering Practice Act of 1989 (225 ILCS 325.4). Therefore, any certification or engineering services which are performed in the State of Illinois must be done by a professional engineer licensed in the State of Illinois.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with Section 14 of the Professional Engineering Practice Act of 1989 (225 ILCS 325.14).

As part of the closure certification, to document the closure activities at your facility, the permittee shall submit a Closure Documentation Report which includes:

- a. A certification signed by the owner or operator, that the owner or operator has recorded the notation on the deed (or other instrument) as specified in Condition I.H.4 above, including a copy of the document in which the notification has been placed, to the Illinois EPA.
- b. A copy of the survey plat required by Conditions I.H.3 and I.H.4 above as well as documentation indicating that the requirements of Condition I.H.4 above have been met.
- c. The volume of waste placed in the CAMU. The term waste includes wastes resulting from decontamination activities.
- d. Scaled drawings showing the horizontal and vertical boundaries of the CAMU.
- e. A chronological summary of closure activities.

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- f. Color photo-documentation of closure. Document conditions before, during, and after closure.
 - g. Information documenting the results of all data collected as part of the Construction Quality Assurance Plan in Appendix E of the approved permit application which was not provided as part of the Construction Certification Report.
5. Under the provisions of 29 CFR 1910 (51 FR 15, 654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 24 hours of safety and health training off site plus a minimum of one day of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

I. FINANCIAL ASSURANCE

1. Within 30 days of the effective date of this permit, the permittee shall provide written documentation to the Illinois EPA Bureau of Land Permit Section which demonstrates the trust fund, or other financial mechanism as specified in 35 IAC Part 724, contains sufficient funds to meet the financial assurance requirements for closure at 35 IAC 724.243. The trust fund must contain at least \$1,519,726 in order to cover the site development and closure costs identified in Attachment D of this permit.
2. As part of the closure documentation report and closure certification, the permittee shall provide to the Illinois EPA Bureau of Land Permit Section copies of the letter of credit, the standby trust, and other documentation required to meet the post-closure financial assurance requirements at 35 IAC 724.245. The amount of the post-closure financial assurance shall be sufficient to cover the long term care costs of \$25,840 per year as identified in Attachment D to this permit.
3. Within 30 days of the effective date of this permit, the permittee shall provide written documentation to the Illinois EPA Bureau of Land Permit Section which demonstrates that Modern Plating Company has obtained liability insurance pursuant to the requirements of 35 IAC 724.247 or attempted to obtain liability insurance within the past 180 days pursuant to Consent Decree 87-C-20315.

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SECTION II

POST-CLOSURE CARE

A. SUMMARY

Hazardous waste management units where waste is left in place must receive post-closure care for at least 30 years after the unit is closed. Activities required during post-closure care include, but are not limited to (1) maintenance of final cover, (2) monitoring of the groundwater, and (3) providing financial assurance for post-closure activities pursuant to 35 IAC Part 724.

B. UNIT IDENTIFICATION

The Permittee shall provide post-closure care for the following hazardous waste management unit, in accordance with the approved permit application and the conditions of this permit:

Name and Type of Unit	Approximate Capacity	Description of Wastes Contained in the Unit
CAMU	17,610 yd ³ (with a maximum volume of 22, 800 yd ³)	Electroplating Sludge (F006), soil with trichloroethylene (F002), soil with cadmium, chromium, cyanide.

C. MONITORING, MAINTENANCE, AND RECORDKEEPING

1. The Permittee shall implement the Post-Closure Plan contained in the Approved Permit Application. All post-closure care activities shall be conducted in accordance with the provisions of the approved permit application and the conditions in this permit.
2. The post-closure care period shall begin upon completion of closure of the unit (the date the permittee submits the certification of closure to the Illinois EPA) and continue for thirty (30) years after that date.

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3. The Permittee shall maintain the components, structures, and equipment at the site in accordance with the maintenance plan in Attachment E of this permit.
4. The Illinois EPA may include restrictions upon the future use of the site if necessary to protect public health and the environment, including permanent prohibition of the use of the site for purposes which may create an unreasonable risk of injury to human health or the environment. After administrative and judicial challenges to such restrictions have been exhausted, the Illinois EPA shall file such restrictions of record in the Office of the Recorder of the county in which the unit is located.
5. The Permittee shall not allow any use of the CAMU designated in Section II.B above to be used in a manner that will disturb the integrity of the final cover, liners any components of the containment system, or function of the facility's monitoring systems during the post-closure care period unless such use is necessary to protect public health or the environment.
6. The permittee shall comply with the requirements for landfills as follows:
 - a. Maintain the integrity and effectiveness of the final cover, including making repairs to the cap as necessary to correct the effects of settling, subsidence, erosion, cracking or other events.

Corrective action shall be taken if ponding has been observed, if cracks or erosion channels greater than one inch wide have formed for whatever reason and if gas, odor, vegetative or vector problems arise, if leachate popouts or seeps are present, or if vegetation with tap roots is found to be growing in areas which are not designed to accommodate such.
 - b. Prevent run-on and run-off from eroding or otherwise damaging the final cover.
 - c. Maintain and monitor the groundwater monitoring system in accordance with the approved permit application and Section III of this permit.
 - d. Protect and maintain surveyed benchmarks used in complying with surveying and recordkeeping requirements.

E. INSPECTIONS

1. The Permittee shall inspect the components, structures, and equipment at the site in accordance with the inspection schedule in Attachment E of this permit. The term

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“major rainfall event” as used in the inspection schedule shall be defined as any storm event of ½ inch of rain or more.

2. The date of the first inspection shall be on the date the closure certification for the CAMU is submitted to the Illinois EPA Bureau of Land Permit Section.
3. The Permittee shall continue to follow the inspection procedures in Condition II.E.1 until the post-closure care period for the CAMU is ended.

F. CONTINGENCY PLAN

1. A release of hazardous waste or hazardous constituents from the CAMU Landfill shall constitute an incident which requires implementation of the Contingency Plan.
2. When the Contingency Plan is implemented, the permittee shall immediately notify either the local government official designated as the on-scene coordinator for that geographical area, or the National Response Center (using their toll free number 800-424-8803). The following information must be provided:

Name and telephone number of reporter;
Name and address of facility;
Time and type of incident (release, fire or explosion);
Name and quantity of material involved, to the extent known;
The extent of injuries, if any; and
The possible hazards to human health or the environment outside the facility.

3. Within 24 hours of implementation of the Contingency Plan, the Permittee shall also contact the Illinois Emergency Management Agency (IEMA), the Bureau of Land's Regional Office in Rockford, IL and the Permit Section (in addition to the other entities identified in the permit application).
4. Any incident associated with the CAMU Landfill which requires implementation of the contingency plan shall be recorded in the facilities operating record in an incident log which is maintained separate from the facility's other operating records. The incident log must include a copy of each incident report. In addition to the information identified in the approved application, the incident report must include, the cause of the release and the measures taken to correct the situation and prevent a reoccurrence.

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G. NOTICES AND CERTIFICATION

1. A request to change the Post-Closure Plan must be submitted in the form of a permit modification request. This request must be in accordance with applicable requirements of 35 Ill. Adm. Code Parts 702, 703 and 724 and must include a copy of the amended Post-Closure Plan for approval by the Illinois EPA.
2. If the Permittee or any subsequent owner or operator of the land upon which the CAMU is located wishes to remove hazardous wastes and hazardous waste residues, the liner, or contaminated soils, they must request a modification to this RCRA post-closure permit in accordance with the applicable requirements in 35 IAC Parts 703, 705 and 724. At a minimum, the owner or operator must demonstrate that the removal of hazardous wastes will satisfy the criteria of 35 IAC 724.217(c).
3. No later than sixty (60) days after completion of the established post-closure care period for the CAMU, the Permittee shall submit to the Illinois EPA Bureau of Land Permit Section, by registered mail, a certification that the post-closure care for the CAMU was performed in accordance with the specifications in the approved post-closure plan in the approved permit application and the conditions in this permit. The certification must be signed by the owner and operator and an independent registered professional engineer. Documentation supporting the independent registered professional engineer's certification must be furnished to the Illinois EPA upon request until the Illinois EPA releases the Permittee from the financial assurance requirements for post-closure care.
4. Within 60 days after receiving certifications from the owner or operator and an independent registered professional engineer that the post-closure care period has been completed for the CAMU in accordance with the approved post-closure plan, the Agency shall notify the owner or operator that it is no longer required to maintain financial assurance for post-closure care of that unit unless the Illinois EPA determines that post-closure care has not been in accordance with the approved post-closure plan. The Illinois EPA shall provide the owner or operator with a detailed written statement of any such determination that post-closure care has not been in accordance with the approved post-closure plan.

H. FINANCIAL ASSURANCE

1. The permittee shall maintain sufficient funds in the letter of credit, the standby trust, or other approved financial instrument to meet the post-closure financial assurance requirements at 35 IAC 724.244 and 724.245.

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SECTION III

GROUNDWATER CORRECTIVE ACTION PROGRAM

A. SUMMARY

Hazardous waste constituents have been detected in groundwater monitoring wells, at the MPC facility, in the vicinity of HWMUs and SWMUs above the groundwater protection standard and background values. Therefore, a corrective action program meeting the requirements of 35 Ill. Adm. Code 724.200 must be implemented at the MPC facility in Freeport, Illinois.

The groundwater corrective action program required by this Permit includes:

- a. The construction of the CAMU which serves as the corrective action and subsequently the basis for the establishment of the Groundwater Management Zone (GMZ).
- b. Determining the quality of groundwater, within the GMZ and in the vicinity of the MPC facility, by comparing analytical results for the specified hazardous constituents to the concentration limits that comprise the groundwater protection standard.
- c. Evaluating the effectiveness of the corrective action based on the quality of groundwater within the GMZ and in the vicinity of the MPC facility.
- d. The establishment and monitoring of the point of compliance at the time in which the monitoring wells in the program have attained the applicable concentration limits that comprise the groundwater protection standard and the GMZ expires.

B. DEFINITIONS

As used herein, the words or phrases set forth below shall have the following definitions:

1. "Uppermost Aquifer" refers to the geologic formation nearest the natural ground surface that is an aquifer, as well as lower aquifers that are hydraulically connected with this aquifer in the vicinity of the facility. The uppermost aquifer in the vicinity of the MPC facility has been identified as the unconsolidated aquifer consisting of permeable alluvial sand and gravel.

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2. "GMZ" refers to the three (3) dimensional region containing groundwater being managed to mitigate impairment caused by the release of contaminants from a site.
3. "Point of Compliance" refers to the vertical surface located at the hydraulically down-gradient limits of the waste management area (the CAMU) extending down into the uppermost aquifer underlying the regulated unit.
4. "Ft - bgs" refers to the number of feet below the ground surface.
5. "Ft-MSL" refers to the number of feet below the ground surface referenced to mean sea level.
6. "Detected" shall mean a concentration equal to or above the PQL listed in USEPA's SW-846 (Third Edition) for the applicable analytical methods specified in the approved Sampling and Analysis Procedures, which are incorporated by reference in Condition III.H of the Permit.
7. "Progressive Increase" shall mean an increase in the concentration of a constituent in successive sampling events.
8. "Stick-up" refers to the height of the reference survey datum. This point is determined within ± 0.01 foot in relation to mean sea level, which in turn is established by reference to an established National Geodetic Vertical Datum.

C. IMPLEMENTATION

1. The Permittee shall begin implementation of the correction action program upon the effective date of this Permit. On that date, the groundwater monitoring and corrective action requirements set forth in this Permit shall supersede those established in the 35 Ill. Adm. Code Part 725 interim status closure and post-closure plan previously approved by the Illinois EPA.
2. The Permittee shall carry out the corrective action monitoring program specified in this Permit on the groundwater beneath the MPC facility in Freeport, Illinois. The uppermost aquifer in the vicinity of the MPC facility has been identified as the unconsolidated aquifer consisting of permeable alluvial sand and gravel.
3. Groundwater monitoring wells at the facility are identified as A through E, referring to the specific screened intervals. These are:

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- A: Screened in the water table in the upper portion of the unconsolidated materials
- B: Screened in the lower portion of the unconsolidated materials
- C: Screened at the surface of the dolomite aquifer
- D: Screened 20 feet (ft) into the dolomite
- E: Screened 40 ft into the dolomite

For the purposes of this Permit and in accordance with 35 Ill. Adm. Code Part 620 regulations: (1) the unconsolidated materials have been designated Class II: General Resource Groundwater; and (2) the dolomite aquifer has been designated Class I: Potable Resource Groundwater. The analytical results obtained from these groundwater monitoring wells shall be compared to the appropriate Class I or Class II concentration limits that comprise the groundwater protection standard found in Condition III.E.1.

4. At this time, the establishment of the point of compliance will be postponed until such time that the monitoring wells at the facility have attained the applicable concentration limits that comprise the groundwater protection standard found in Condition III.E.1 and the GMZ expires. At that time, MPC must submit a proposal for the establishment of a point of compliance which satisfies the regulatory requirements found in 35 Ill. Adm. Code 724, Subpart F and reflects the current conditions at the facility.

D. WELL AND SUMP LOCATIONS AND CONSTRUCTION

1. The Permittee shall maintain the groundwater monitoring wells identified in the table below to allow for the collection of groundwater samples. The location of these wells is specified in Drawing No. 20R of the approved permit application.

<u>IEPA Well No.</u>	<u>MPC Well No.</u>	<u>Hazardous Waste Constituents</u>	<u>Well Depth (ft-bgs)</u>	<u>Well Depth Elevation (ft MSL)</u>	<u>Well Screen Interval (ft MSL)</u>
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"A" Groundwater Monitoring Wells

G06S	MW-6A	V	12.5	742.1	747.1 - 742.1
G07S	MW-7A	V	12.5	740.7	745.7 - 740.7

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G08S	MW-8A V	13.0	741.4	746.4 - 741.4
G09S	MW-9A I	23.0	745.8	755.8 - 745.8
G10S	MW-10A I	21.5	743.8	753.8 - 743.8
G11S	MW-11A	12.0	742.4	747.7 - 742.7
G12S	MW-12A I	12.0	741.6	746.6 - 741.6
G13S	MW-13A I	12.2	740.6	745.9 - 740.9
G14S	MW-14A I	18.5	740.1	751.6 - 741.6
G15S	MW-15A I	12.0	743.8	749.1 - 744.1
G17S	MW-17A	17.9	737.9	743.8 - 738.8
G18S	MW-18A	16.0	738.6	743.6 - 738.6
G19S	MW-19A	14.0	740.7	745.7 - 740.7
GA1S	MW-21A I	25.8	747.2	757.2 - 747.2
GA2S	MW-22A I	25.8	748.4	758.4 - 748.5

"B" Groundwater Monitoring Wells

G06U	MW-6B	27.0	727.5	737.5 - 727.5
G07U	MW-7B	27.0	726.2	736.2 - 726.2
G12U	MW-12B V	28.0	725.6	735.6 - 725.6
G13U	MW-13B V	28.0	724.8	734.8 - 724.8
G14U	MW-14B V	22.4	736.2	741.6 - 736.6
G15U*	MW-15B*VI	31.2	724.6	734.6 - 724.6
G17U*	MW-17B*VI	37.2	718.8	729.3 - 719.3
G18U*	MW-18B*VI	37.4	717.3	727.3 - 717.3
G19U	MW-19B VI	36.9	717.9	727.9 - 717.9

"C" Groundwater Monitoring Wells

G05M	MW-5C V	23.0	755.1	760.1 - 755.1
G06M	MW-6C V	43.5	710.9	715.9 - 710.9
G07M	MW-7C	40.0	713.3	718.3 - 713.3
G08M	MW-8C V	72.0	682.7	687.7 - 682.7
G11M	MW-11C V	66.3	688.0	693.8 - 688.8
G12M	MW-12C	53.0	700.6	705.6 - 700.6
G13M	MW-13C	84.0	669.0	674.0 - 669.0
G14M	MW-14C V	80.5	678.3	683.3 - 678.3
G15M*	MW-15C*VI	104.5	651.2	657.7 - 652.7
G16M*+	MW-16C*+VI	29.0	752.6	764.6 - 754.6
G17M*	MW-17C*VI	108.0	648.0	653.0 - 648.0
G19M*	MW-19C*VI	110.3	644.6	650.6 - 644.6
GA0M	MW-20C I	27.0	740.3	742.3 - 752.3

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GA1M	MW-21C	57.3	715.8	772.5 - 717.5
GA2M	MW-22C	62.5	711.8	718.5 - 713.5
GA3M*	MW-23C*VI			

“D” Groundwater Monitoring Wells

G05L	MW-5D I	40.0	738.2	749.5 - 739.5
G07L	MW-7D V	50.0	703.3	713.3 - 703.3
G17L*	MW-17D*VI	121.1	634.8	644.8 - 634.8
G18L*	MW-18D*VI	146.6	608.0	615.0 - 608.0
G19L*	MW-19D*VI	149.9	604.7	616.7 - 604.7

“E” Groundwater Monitoring Wells

G11D	MW-11E	101.0	653.3	665.8 - 655.8
G12D	MW-12E	87.2	666.3	676.3 - 666.3
G13D	MW-13E	117.9	634.9	645.8 - 635.8
G14D	MW-14E	114.0	644.7	654.7 - 644.7

River Sampling Points

S201	PR-1	VI	NA	NA	NA
S102	PR-2	VI	NA	NA	NA

Notes:

1. + - Denotes Upgradient Well
2. * - Denotes GMZ Wells
3. V - Analysis of Volatile Organic Compounds listed in Condition III.E.1
4. I - Analysis of Inorganic constituents listed in Condition III.E.1
5. NA - Not applicable

Within thirty (30) days of the date that installation of groundwater monitoring well MW-23C is completed, the Permittee shall submit the following information:

1. Well Depth (ft-bgs)
2. Well Depth Elevation (ft-MSL)
3. Well Screen Interval (ft-MSL)

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2. Construction of each monitoring well/piezometer must be in accordance with the diagram contained in Attachment F to this Permit or details and diagrams approved by the Illinois EPA. All new monitoring wells/piezometers to be installed must be continuously sampled and logged on Illinois EPA boring logs as shown in Attachment F unless otherwise approved by the Illinois EPA.
3. The Permittee shall notify the Illinois EPA within thirty (30) days in writing if any of the wells identified in Condition III.D.1 are damaged or the structural integrity has been compromised. A proposal for the replacement of the subject well shall accompany this notification. The well shall not be plugged until the new well is on-line and monitoring data has been obtained and verified, unless the well is extremely damaged or would create a potential route for groundwater contamination. Prior to replacing the subject well, the Permittee shall obtain written approval from the Illinois EPA regarding the proposed installation procedures and construction.
4. Should any well become consistently dry or unserviceable, a replacement well shall be provided within ten (10) feet of the existing well. This well shall monitor the same zone as the existing well and be constructed in accordance with the current Illinois EPA groundwater monitor well construction standards at the time that the well is replaced. A replacement well which is more than ten (10) feet from the existing well or which does not monitor the same geologic zone must be approved by the Illinois EPA and designated as a new well.
5. The Permittee shall submit boring logs, construction diagrams, and data sheets from installation and development of a new or replacement well to the Illinois EPA at the address below within thirty (30) days of the date that the installation of the well is completed. In addition, the Permittee shall submit certification that plugging and abandonment of a well was carried out in accordance with the approved procedures to the Illinois EPA at the address below within thirty (30) days of the date that the well is plugged and abandoned. All information should be submitted to the appropriate State Agencies.

Illinois Environmental Protection Agency
Planning and Reporting Section
Bureau of Land
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

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6. All wells/piezometers shall be equipped with protective caps and locks. Monitoring wells or piezometers located in high traffic areas must be protected with bumper guards.
7. All groundwater monitoring wells and piezometers not utilized in the approved groundwater monitoring system, but retained by the facility, must be constructed and maintained in accordance with 77 Ill. Adm. Code 920 regulations. Monitoring wells and piezometers that are improperly constructed must be abandoned in accordance with Condition III.D.3.

E. GROUNDWATER PROTECTION STANDARD

1. The following hazardous constituents and concentration limits comprise the groundwater protection standard in the vicinity of the MPC facility. (Total (unfiltered) values, derived from the applicable USEPA SW-846 (Third Edition) method, will be used for comparison with the concentration limits)

<u>Field Parameters</u>	<u>Storet</u>	<u>Units</u>
pH	00400	
Specific Conductance	00094	micromhos/cm
Temperature of Water Sample	00011	(°F)
Turbidity	45626	Ntus
Depth to Water (below land surface)	72019	Feet
Depth to Water (below measuring point)	72109	Feet
Elevation of Groundwater Surface	71993	Ft MSL
Elevation of Bottom of Well #	72020	Ft MSL
Elevation of Measuring Point (Top of casing) ##	72110	Ft MSL

- # Shall be determined during the second sampling event each year
 ## Shall be surveyed once every five (5) years, or at the request of the Illinois EPA, or whenever the elevation changes as required by Condition III.I.5.

<u>Hazardous Waste Constituents</u>	<u>Storet Number</u>	<u>Concentration Limits (mg/l)</u>	
		<u>Class I</u>	<u>Class II</u>

Volatile Organic Compounds

Tetrachloroethylene	34475	0.005	0.025
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Trichloroethene	39180	0.005	0.025
Cis-1,2-Dichloroethene	77093	0.07	0.2
Vinyl Chloride	39175	0.002	0.01

Inorganics (Totals)

Cadmium	01027	0.005	0.05
Chromium	01034	0.1	1.0
Lead	01051	0.0075	0.1
Nickel	01067	0.1	2.0

2. Alternate concentration limits may be established where the Permittee can determine a constituent will not pose a substantial hazard to human health or the environment.
 - a. Where a hazardous constituent has a standard in 35 Ill. Adm. Code 620, the facility must apply for an adjusted standard as outlined in Section 28.1 of the Environmental Protection Act or reapply once corrective measures have been implemented pursuant to 35 Ill. Adm. Code 620.450.
 - b. For those hazardous constituents without a 35 Ill. Adm. Code 620 standard, the alternative concentration limits proposed by the facility must be approved by the Illinois EPA.
3. The compliance period (post-closure period) during which the groundwater protection standard applies shall be extended until the Permittee demonstrates that the groundwater protection standard has not been exceeded at the point of compliance for three consecutive years.

F. CORRECTIVE ACTION PROGRAM

The Permittee shall conduct the corrective action program and perform groundwater monitoring detailed in this section, in accordance with the following:

1. Upon initiation of the corrective action program the GMZ shall be monitored and maintained. The GMZ is delineated by the groundwater monitoring wells found in Condition III.D.1.
2. The Permittee shall collect, preserve, analyze groundwater samples pursuant to Condition III.H.

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3. The Permittee shall determine groundwater quality at each of the groundwater monitoring wells identified in Condition III.D.1 semi-annually during the active life (including closure and post-closure care period).
4. Samples collected during the first and third quarters shall be analyzed for the constituents identified in Condition III.E.1.
5. The Permittee shall determine the groundwater flow rate and direction in the uppermost aquifer at least annually from the monitoring wells listed in Condition III.D.1.
6. The Permittee shall evaluate the results of the analyses required by Condition III.F.3 above and identify:
 - a. The concentration of any organic constituent detected which is equal to or greater than the appropriate concentration limit listed in Condition III.E.1.
 - b. The concentration of any total (unfiltered) inorganic constituent detected which is equal to or greater than the appropriate concentration limit listed in Condition III.E.1.
 - c. The concentration of any constituent detected which was not detected during the previous sampling event.
 - d. The concentration of any constituent which exhibits a progressive increase over two (2) consecutive sampling events.

G. GROUNDWATER ELEVATIONS

1. The Permittee shall determine the groundwater surface elevation referenced to MSL at each well each time groundwater is sampled in accordance with Condition III.I.3.
2. The Permittee shall determine the surveyed evaluation of the "stick-up" referenced to MSL once every five (5) years, or at the request of the Illinois EPA, or whenever the elevation changes in accordance with Condition III.I.5.
3. Elevation, as referenced to MSL, of the bottom of each monitoring well (Storet 72020) is to be reported at least annually. The mandatory measurement shall be taken during the second semi-annual sampling event each year.

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H. SAMPLING AND ANALYSIS PROCEDURES

The Permittee shall use the techniques and procedures described in Section E of the approved permit application, except as modified below, when obtaining and analyzing samples from the groundwater monitoring wells described in Condition III.D.1 above:

1. Samples shall be collected by the techniques described in Section E of the approved permit application.
2. Samples shall be preserved, shipped, and handled in accordance with the procedures specified in Section E of the approved permit application.
3. Samples shall be analyzed according to the procedures specified in Section E of the approved permit application with the exception that SW-846 Method 8021B shall be utilized to analyze volatile organic compounds.
4. Samples shall be tracked and controlled using the chain of custody procedures specified in Section E of the approved permit application.

I. REPORTING AND RECORDKEEPING

1. The Permittee shall enter all monitoring, testing and analytical data obtained in accordance with Conditions III.E, III.F, and III.G in the operating record.
2. Samples collected to meet the requirements of the groundwater monitoring program described in Conditions III.E and III.F shall be collected and reported, as identified in the table below. The result of the analyses conducted on the groundwater quality samples shall be submitted in accordance with this schedule. All additional data collected for the groundwater monitoring program (as specified in Conditions III.E, III.F, and III.G) shall also be submitted to the Illinois EPA in accordance with this schedule.

<u>Samples to be Collected During the Months of</u>	<u>Results Submitted to the Illinois EPA by the Following</u>	<u>Constituents</u>
First Quarter	April 15	III.E.1
Third Quarter	October 15	III.E.1

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3. Groundwater surface elevation data, measured pursuant to Condition III.G.1 shall be collected at least semi-annually and submitted to the Illinois EPA as identified in the table above.
4. The Permittee shall report the groundwater flow rate and direction in the uppermost aquifer, as required by Condition III.F.5 during the second semi-annual sampling event of each year.
5. The Permittee shall report the surveyed elevation, as required by Condition III.G.2, of the top of the well casing ("stick-up"), referenced to MSL, in accordance with the following schedule:
 - a. For wells identified in Condition III.D.1 above, every five years (during the second sampling event), or at the request of the Illinois EPA, or whenever the elevation changes. The initial "re-survey" of these wells shall be conducted during the second semi-annual sampling event following the effective date of the Permit.
 - b. For any new wells, at the time of installation and reported in the as-built diagrams. Subsequent measurements shall be made every five years (during the second quarter sampling event) or whenever the elevation changes.
6. Elevation of the bottom of each monitoring well identified in Condition III.D.1, referenced to MSL, is to be reported annually. This measurement shall be taken during the second quarter sampling event. (Storet 72020)
7. Information required by Conditions III.I.2, III.I.3, III.I.5, and III.I.6 shall be submitted on the chemical analysis forms (Attachment F) or in another format/media pre-approved by the Illinois EPA.
8. The Permittee shall report all information to the Illinois EPA in a form which can be easily reviewed. All submittals must contain tables of data, drawings, and text (as necessary) to accurately describe the information contained in the submittal.
9. The Permittee shall submit a written report to the Illinois EPA, in accordance with the schedule found in Condition III.I.2 above, which discusses the effectiveness of the corrective action program.

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J. REQUEST FOR PERMIT MODIFICATION

1. If the Permittee determines that the corrective action monitoring program no longer satisfies the requirements of 35 Ill. Adm. Code 724.200, then within ninety (90) days, the Permittee must submit an application for a permit modification to the Bureau of Land of the Illinois EPA to make any appropriate changes to the program which will satisfy the regulations.

2. Conditions in this section of the Permit may be modified in accordance with 35 Ill. Adm. Code 705.128 if there is cause for such modification, as defined in 35 Ill. Adm. Code 702.184. Causes for modification identified in this section include, but are not limited to, alterations to the permitted facility, additional information which would have justified the application of different permit conditions at the time of issuance, and new regulations.

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SECTION IV

CORRECTIVE ACTION SOLID WASTE MANAGEMENT UNITS

A. INTRODUCTION

In accordance with Section 3004 of RCRA and 35 Ill. Adm. Code 724.201, the Permittee, Modern Plating Corporation, shall institute such corrective action as necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents, listed in 35 Ill. Adm. Code 721. Appendix H and any solid waste management unit at their facility in Freeport, Illinois.

1. Modern Plating Corporation (MPC) has been addressing soil and groundwater contamination associated with releases from eight units at the facility: Lagoon 1, Lagoon 2, Lagoon 3, the Shawnee Building, Cyanide Treatment Vault, Lagoon 0, Lagoon 1A, and the Wetlands Area. The first four of these are RCRA hazardous waste management units and the second four are Solid Waste Management Units (SWMUs). Figure 1 shows the location of these units.
2. MPC has been carrying out RCRA closure/corrective action for the above units under USEPA's and Illinois EPA's oversight. Initially these efforts were carried out in accordance with an Illinois EPA RCRA interim status closure plan. Illinois EPA placed MPC on the Site Remedial Activities Priorities List on July 24, 1985 and then issued a 4 (q) Notice on June 20, 1986. On December 31, 1987, the USEPA issued a Administrative Order of Consent (AOC) which superseded the interim status closure plan. The efforts overseen by Illinois EPA and USEPA under these documents mainly focused on characterizing the nature and extent of soil and groundwater at the units identified above.

In December 1996, the USEPA informed MPC that the selection and implementation of corrective action activities required at the MPC facility would be deferred to the Illinois EPA through the RCRA interim status closure plans already in place for the facility. Illinois EPA has addressed proposed remedial activities in letters to MPC dated May 23, 1997 (comments on a proposed outline for a closure plan modification request); September 15, 1997 (approval of a revised groundwater monitoring program); November 21, 1997 (comments on a proposed outline for a RCRA permit application);

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March 2, 1998 (comments on a proposed RCRA closure plan modification request); June 1, 1998 (comments on a RCRA permit application); and November 18, 1998 (comments on the Revision 1 of the proposed RCRA closure plan).

A final RCRA closure plan for MPC was approved on December 2, 1999. The closure plan describes the procedures to be used to remediate waste and contaminated soil at the eight units identified above. A groundwater management zone was also established in the approved closure plan for this facility. Post-closure care of these units, including groundwater monitoring, will be established in the closure plan and this permit.

The waste and contaminated soil, removed in accordance with the approved plan, are to be placed in an on-site Corrective Action Management Unit (CAMU). Section II of this permit contains requirements associated with the design and operation (**post-closure care**) of the CAMU. Section III of this permit contains requirements associated with groundwater monitoring, and remediation if necessary, for the CAMU and the facility overall.

3. Illinois EPA has authority for imposing corrective action requirements at RCRA permitted facilities and will be responsible for overseeing future corrective activities at this facility.
4. MPC may conduct interim measures to minimize the impact of a release from any unit at the facility, provided such measures are approved in accordance with the terms and conditions of this permit.
5. The Permittee must provide corrective action, as appropriate, for any future releases from SWMUs present at the facility.
6. The Permittee must provide financial assurance for completing corrective action, as required by 35 Ill. Adm. Code 724.201.
7. The requirements of 35 Ill. Adm. Code 742 (TACO) must be met in determining remediation objectives for all corrective action activities.

B. REMEDIAL EFFORTS COMPLETED TO DATE

MPC entered a Consent Agreement and Final Order with the USEPA on November 23, 1985 which required the facility to submit: (1) a revised RCRA Part A application identifying all

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hazardous waste management units at the facility including the Shawnee Building; (2) a RCRA closure plan and a RCRA interim status groundwater monitoring plans for Lagoons 1,2 and 3. The Illinois EPA approved a RCRA closure plan for Lagoons 1,2, and 3 to close as landfills on January 23, 1987.

The MPC was placed on Illinois EPA's Site Remedial Action Priorities List on July 24, 1985. On June 20, 1986 Illinois EPA issued a 4(q) Notice which required clean up of the MPC facility. An Administrative Order of Consent (AOC) was negotiated to combine Federal and State enforcement and permit actions on December 31, 1987. The AOC required MPC to perform a RCRA Facility Investigation (RFI) and Corrective Measure Study (CMS) for all the solid and hazardous waste management units at the facility and to implement corrective action.

During the RFI, it was determined through the investigations described below, that a total of eight units required remediation. These units included four hazardous waste management units (the Shawnee Building, Lagoon 1, Lagoon 2 and Lagoon 3) and four solid waste management units (Cyanide Treatment Vault, Lagoon 0, Lagoon 1A and the Wetlands Area).

In the Shawnee Building soil investigations were performed concurrently with the RFI/CMS at MPC. A RCRA closure plan for the hazardous waste storage areas (Area A, Area B and Area C) in the Shawnee Building was approved by the Illinois EPA in 1989. In 1993, soil cleanup objectives were established (compounds of concern include cadmium, cyanide, and trichloroethylene) and groundwater monitoring wells were installed. The extent of soil contamination has been defined and soil remediation has been incorporated into RCRA corrective action activities.

During RFI soil investigation soil borings BA-1A through B-6A were taken in order to verify the boundaries of the two buried lagoons, Lagoons 0 and Lagoon 1A. These results were mapped by an electromagnetic soil survey. Two (2) soil borings were completed in all five lagoons (LG-1-LG-10) to sample the depth of waste sludge. Twenty-three (23) soil samples were collected from the wetland area adjacent to the lagoons. Four (4) surface samples were taken at four of these locations to assess human exposure to soil. Soil data coupled with groundwater monitoring data described below indicated that the lagoons were the principle source of contamination.

Sediment samples taken from the Pecatonica River during the RFI indicated no measurable impact on sediment quality at the sampling stations. Surface water samples found elevated cadmium, chromium, and nickel concentrations relative to background in the meander lake.

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However, the RFI environmental risk assessment performed in 1990 indicated that the potential exposure posed by the concentrations in the meander lake presented no health risk.

During the RFI, 13 additional monitoring wells were installed, 9A, 10A and well nests 17, 18 and 19 were installed. Well nests 17, 18, and 19 were installed to determine: (1) the extent of contamination in the unconsolidated and upper dolomite aquifers north of the lagoon area; and (2) the effect of the river on groundwater elevation in the aquifers near the river. Wells 9A and 10A were installed to determine: (1) groundwater contamination in the upper unconsolidated aquifer down-gradient of Lagoons 0 and Lagoon 1A; and (2) whether or not the water table was in contact with the bottoms of the lagoons.

The focus of investigation efforts from 1991 and 1993 was development of an acceptable corrective action measures study. During this time it was determined that additional soil samples and monitoring wells were necessary in order to: (1) determine if a release of hazardous waste or hazardous constituents into the soils, sediments, and/or groundwater had occurred during the operation of the underground cyanide treatment vault; and (2) to characterize the nature and extent of groundwater and soil contamination east and northeast of Lagoon 3. These investigative activities were completed in 1994.

Additional work on a corrective measures study for the facility was completed in 1995 and 1996. On December 24, 1996, USEPA sent MPC a letter stating that the AOC was terminated and the selection and implementation of a corrective action measure would be taken over by the Illinois EPA.

Illinois EPA and MPC met several times and exchanged several correspondences in 1997 and early 1998 in an effort to establish an acceptable plan for a remedial action at the eight units of concern. On June 26, 1998, Foth and Van Dyke (FVD), consultants for MPC, submitted to the Illinois EPA a report entitled "Modification to RCRA Closure Plan and Basis of Design Report (Revision 1)." This submittal contained: (1) a history of the investigative/remedial activities completed to date; (2) the anticipated steps for completing remedial activities at the eight units of concern at the site, including an evaluation of the site using the procedures in 35 Ill. Adm. Code 742 (TACO); and (3) remediation cost estimates and a post-closure care and monitoring program.

Illinois EPA indicated it could not approve the proposed closure plan in a November 18, 1998 letter and identified the deficiencies (in Attachments III through IV) found in the proposed plan. MPC/FVD submitted a series of letters in March, April and May 1999 in order to conceptually address the major issues raised in the November 18, 1998 letter from

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the Illinois EPA. Illinois EPA responded to these submittals in a May 25, 1999 letter to MPC. This letter indicated that the majority of the deficiencies in the November 18, 1998 letter were adequately addressed in concept and also approved groundwater management zone. The letter also contained those items still not adequately addressed and requested a final revised RCRA closure plan.

C. CURRENT/FUTURE REMEDIAL ACTIVITIES

On July 22, 1999 Foth & Van Dyke submitted, on behalf of Modern Plating Corporation (MPC) a document entitled "Final RCRA Closure Plan and Basis Design Report" (Volume 1 and Volume II). The final RCRA closure plan stated that remediation activities for the eight units of concern must be performed in accordance with the July 22, 1999 final RCRA closure plan and is summarized below:

1. Lagoons 0, Lagoon 1, Lagoon 1A, Lagoon 2, and Lagoon 3 and the Cyanide Treatment Vault Area
 - a. At Lagoons 0, 1, 1A, 2, and 3, MPC will over-excavate 1 foot of the base and 1 foot of interior side slopes. Excavated soil (an estimated 15,250 cubic yards) will be removed from the lagoons and be placed in a Corrective Action Management Unit (CAMU) to be constructed at the location of Lagoon 2 and Lagoon 3.
 - b. In the Cyanide Treatment Vault Area, 2 feet of contaminated soil will be excavated from the floor and side walls of the former vault (approximately 200 cubic yards) and placed in the CAMU.
 - c. After excavation activities, soil samples will be obtained in the lagoon areas and Cyanide Treatment Vault Area to define the amount of residual contamination.
 - d. An engineered barrier meeting the requirements of 35 Ill. Adm. Code 724.328 will be placed over these areas. Institutional controls and 30 year post-closure monitoring will be present for all units not achieving clean closure. Clean closure is not the goal of remediation efforts at the Lagoons or the Cyanide Treatment Tank Area.
2. Shawnee Building

At the Shawnee Building three areas were used for storage of hazardous waste. Remediation requires that soil meets 35 Ill. Adm Code 742 TACO Tier II remedial

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objectives and a remedial objectives of 400 mg/kg for Lead. An estimated 30 cubic yards of soil will be removed in order to achieve these remedial objectives and meet the clean closure requirements of 35 Ill. Adm Code 725 Subpart G. Contaminated soil will be placed in the on-site CAMU.

3. Wetland Area

In the Wetland Area soil will be removed in three areas. Two of these areas are on-site areas immediately north of Lagoon 2 and one area is off-site area in the low area northeast of MW-13. Soil shall be excavated to meet 35 IAC Section 742 TACO - Tier I remedial objectives. Contaminated soil will be placed in the on-site CAMU. This effort will meet the clean closure requirements of 35 Ill. Adm Code 725 Subpart G.

4. A Groundwater Management Zone (GMZ) has been established to address contaminated groundwater at the MPC facility. The GMZ was approved in the May 25, 1999 letter from the Illinois EPA. Condition 1 and 2 of that letter were removed from the December 2, 1999 final RCRA closure plan approval. Section III also establishes the requirements for a GMZ at this facility.

5. MPC must place institutional controls meeting the requirements of 35 Ill. Adm. Code 742.1000 - Institutional Controls to restrict: (1) future land use; and (2) direct exposure in the future to soil remaining at the five (5) Lagoons and the Cyanide Treatment Vault unit.

D. FINANCIAL ASSURANCE FOR CORRECTIVE ACTION

1. The Permittee has prepared a cost estimate for completing the corrective action required under this permit, in order to provide financial assurance for completion of corrective action, as required under 35 IAC 724.201(b). The cost estimate was based upon the cost of contamination investigations and assessments for the SWMU(s), and design, construction, operation, inspection, monitoring, and maintenance of the corrective measure(s) to meet the requirements of 35 IAC 724.201. The initial cost to complete corrective action required under this permit. was estimated to be **\$1,844,700 (1999 dollars)**. A revised cost estimate must be submitted upon written Illinois EPA request.
2. The Permittee shall demonstrate continuous compliance with 35 IAC 724.201 by providing documentation of financial assurance using a mechanism specified in 35 IAC 724.243, in at least the amount of the cost estimate required under Condition D. 1

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above. The words "completion of corrective action" shall be substituted for "closure and/or post-closure", as appropriate in the financial instrument specified in 35 IAC 724.251. The documentation shall be submitted to the Illinois EPA within 30 days after Illinois EPA's approval of the initial or revised cost estimates required under Condition IV.D.1 above. The Illinois EPA may accept financial assurance for completion of corrective action in combination with another financial mechanism that acceptable under 35 IAC 724.246 at its discretion.

E. FUTURE RELEASES FROM SWMUs

1. The Permittee shall notify the Illinois EPA in writing of any newly-identified SWMU(s) or release from an existing SWMU discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than sixty (60) calendar days after discovery. The notification shall provide the following information, as available:
 - a. The location of the newly-identified SWMU in relation to other SWMUs on a scaled map or drawing;
 - b. The type and past and present function of the unit;
 - c. The general dimensions, capacities, and structural description of the unit (available drawings and specifications provided);
 - d. The period during which the unit was operated;
 - e. The specifics on all materials, including but not limited to, wastes and hazardous constituents, that have been or are being managed at the SWMU, to the extent available; and
 - f. The results of any relevant available sampling and analysis which may aid in determining whether releases of hazardous wastes or hazardous constituents have occurred or are occurring from the unit.
2. If the submitted information demonstrates a potential for a release of hazardous waste or hazardous waste constituents from the newly identified SWMU, the Illinois EPA

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may request in writing, that the Permittee prepare a Solid Waste Management Unit (SWMU) Assessment Plan and a proposed schedule of implementation and completion of the Plan for any additional SWMU(s) discovered subsequent to the issuance of this Permit.

3. Within 120 calendar days after receipt of the Illinois EPA request for a SWMU Assessment Plan, the Permittee shall submit a SWMU Assessment Plan to Illinois EPA. The plan shall propose investigations, including field investigations if necessary, to determine the release potential to specific environmental media for the newly-identified SWMU. The SWMU Assessment Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify migration of hazardous waste and hazardous constituents from the newly-discovered SWMU(s) to the environment.
4. After the Permittee submits the SWMU Assessment Plan, the Illinois EPA shall either approve, approve with conditions or disapprove the Plan in writing. If the plan is approved, the Permittee shall begin to implement the Plan within forty-five (45) calendar days of receiving such written notification. If the Plan is disapproved, the Illinois EPA shall notify the Permittee in writing of the Plan's deficiencies specify a due date for submittal of a revised plan.
5. The Permittee shall submit a report documenting the results of the approved SWMU Assessment Plan to the Illinois EPA in accordance with the schedule in the approved SWMU Assessment Plan. The SWMU Assessment Report shall describe all results obtained from the implementation of the approved SWMU Assessment Plan. Based upon the results of Illinois EPA's review of this submittal, it may be necessary for the Permittee to conduct further investigation, develop final remediation objectives or carry out a corrective measures program.

F. INTERIM MEASURES

At any time during the completion of remedial activities the Permittee may initiate additional interim measures for the purpose of preventing continuing releases and/or mitigating the results of releases and/or mitigating the migration of hazardous wastes or hazardous constituents. It shall not be necessary to conduct all phases of an investigation prior to implementing an interim measure if the Illinois EPA and the Permittee agree that a problem can be corrected, or a release cleaned up, without additional study and/or without a formal Corrective Measure Study.

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1. Prior to implementing any interim measures beyond those specified above, the Permittee must submit detailed information regarding the proposed interim measure to the Illinois EPA for approval. This information shall include, at a minimum:
 - a. Objectives of the interim measures: how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long-term solution at the facility;
 - b. Design, construction, and maintenance requirements;
 - c. Schedules for design and construction; and
 - d. Schedules for progress reports.
2. If the Illinois EPA determines that a release cannot be addressed without additional study and/or a formal CMS, then the Illinois EPA will notify the Permittee that these must be performed. Any proposal made under this provision or any other activity resulting from such proposal, including the invocation of dispute resolution, shall not affect the schedule for implementation of the remedial action plan or of any other portion of the permit.

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SECTION V

STANDARD CONDITIONS

GENERAL REQUIREMENTS

1. **EFFECT OF PERMIT.** The existence of a RCRA permit shall not constitute a defense to a violation of the Environmental Protection Act or Subtitle G, except for development, modification or operation without a permit. Issuance of this permit does not convey property rights or any exclusive privilege. Issuance of this permit does not authorize any injury to persons or property or invasion of other private rights, or infringement of state or local law or regulations. (35 IAC 702.181)
2. **PERMIT ACTIONS.** This permit may be modified, reissued or revoked for cause as specified in 35 IAC 703.270 through 703.273 and Section 702.186. The filing of a request by the Permittee for a permit modification or revocation, or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. (35 IAC 702.146)
3. **SEVERABILITY.** The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby. (35 IAC 700.107)
4. **PERMIT CONDITION CONFLICT.** In case of conflict between a special permit condition and a standard condition, the special condition will prevail. (35 IAC 702.160)
5. **DUTY TO COMPLY.** The Permittee shall comply with all conditions of this permit except for the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of the Environmental Protection Act and is grounds for enforcement action; permit revocation or modification; or for denial of a permit renewal application. (35 IAC 702.141 and 703.242)
6. **DUTY TO REAPPLY.** If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must apply for a new permit at least 180 days before this permit expires, unless permission for a later date has been granted by the Illinois EPA. (35 IAC 702.142 and 703.125)

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7. PERMIT EXPIRATION. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 35 IAC 703.181-703.209) and through no fault of the Permittee the Illinois EPA has not issued a new permit as set forth in 35 IAC 702.125.
8. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (35 IAC 702.143)
9. DUTY TO MITIGATE. In the event of noncompliance with the permit, the permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. (35 IAC 702.144)
10. PROPER OPERATION AND MAINTENANCE. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory, and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit. (35 IAC 702.145)
11. DUTY TO PROVIDE INFORMATION. The Permittee shall furnish to the Illinois EPA, within a reasonable time, any relevant information which the Illinois EPA may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Illinois EPA, upon request, copies of records required to be kept by this permit. (35 IAC 702.148)
12. INSPECTION AND ENTRY. The Permittee shall allow an authorized representative of the Illinois EPA, upon the presentation of credentials and other documents as may be required by law, to:
 - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

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- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
 - d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location. (35 IAC 702.149)
13. MONITORING AND RECORDS. (35 IAC 702.150)
- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste must be the appropriate method from Appendix A of 35 IAC 721. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, latest versions; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, latest versions; or an equivalent method as specified in the approved Waste Analysis Plan.
 - b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or application. These periods may be extended by request of the Illinois EPA at any time. The permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well.
 - c. Records of monitoring information shall include:
 - i. The date(s), exact place, and time of sampling or measurements;
 - ii. The individual(s) who performed the sampling or measurements;
 - iii. The date(s) analyses were performed;
 - iv. The individual(s) who performed the analyses;

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- v. The analytical technique(s) or method(s) used; and
 - vi. The result(s) of such analyses. (35 IAC 702.150)
14. **REPORTING PLANNED CHANGES.** The permittee shall give written notice to the Illinois EPA as soon as possible of any planned physical alterations or additions to the permitted facility. In general, proposed changes to the facility will need to be submitted to the Illinois EPA as permit modification request that complies with the requirements of 35 IAC 703.280. (35 Ill. Adm. Codes 702.152(a))
15. **CONSTRUCTION CERTIFICATION.** For a new hazardous waste management facility, the permittee shall not commence treatment, storage or disposal of hazardous waste; and for a facility being modified the permittee shall not treat, store or dispose of hazardous waste in the modified portion of the facility, until:
- a. The permittee has submitted to the Illinois EPA by certified mail or hand delivery a letter signed by the permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
 - b.
 - 1. The Illinois EPA has inspected the modified or newly constructed facility and finds it is in compliance with the condition of the permit; or
 - 2. If, within 15 days of the date of submission of the letter in paragraph (a), the permittee has not received notice from the Illinois EPA of its intent to inspect, prior inspection is waived and the permittee may commence treatment, storage or disposal of hazardous waste. (35 Ill. Adm. Code 703.247)
16. **ANTICIPATED NONCOMPLIANCE.** The Permittee shall give advanced written notice to the Illinois EPA of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements, regulations, or the Act. (35 Ill. Adm. Code 702.152(b))
17. **TRANSFER OF PERMITS.** This permit may not be transferred by the permittee to a new owner or operator unless the permit has been modified or reissued pursuant to 35 IAC 703.260(b) or 703.272. Changes in the ownership or operational control of a facility must be made as a Class 1 modification with the prior written approval of the Illinois EPA. The new owner or operator shall submit a revised permit application no later than 90 days prior to the scheduled change. (35 Ill. Adm. Code 703.260)

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18. MONITORING REPORTS. Monitoring results shall be reported at the intervals specified in the permit. (35 IAC 702.152(d))
19. COMPLIANCE SCHEDULES. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than specified in 35 IAC 702.162. (35 IAC 702.152(e))
20. TWENTY-FOUR HOUR REPORTING.
 - a. The Permittee shall report to the Illinois EPA any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the following circumstances. This report shall include the following:
 - i. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
 - ii. Information concerning the release or discharge of any hazardous waste or of a fire or explosion at the HWM facility, which could threaten the environment or human health outside the facility.
 - b. The description of the occurrence and its cause shall include:
 - i. Name, address, and telephone number of the owner or operator;
 - ii. Name, address, and telephone number of the facility;
 - iii. Date, time, and type of incident;
 - iv. Name and quantity of material(s) involved;
 - v. The extent of injuries, if any;
 - vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
 - vii. Estimated quantity and disposition of recovered material that resulted from the incident.

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- c. A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times and if the noncompliance has not been corrected; the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Illinois EPA may waive the five day written notice requirement in favor of a written report within fifteen days. (35 IAC 702.152(f) and 703.245(b))
21. OTHER NONCOMPLIANCE. The Permittee shall report all instances of noncompliance not otherwise required to be reported under Standard Conditions 16, 19, and 20, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in Standard Condition 20. (35 IAC 702.152(g))
22. OTHER INFORMATION. Where the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Illinois EPA, the Permittee shall promptly submit such facts or information. (35 IAC 702.152(h))
23. ANNUAL REPORT: An annual report must be submitted covering facility activities during the previous calendar year. (35 IAC 724.175)
24. SUBMITTAL OF REPORTS OR OTHER INFORMATION. All written reports or other written information required to be submitted by the terms of this permit shall be sent to:
Illinois Environmental Protection Agency
Bureau of Land
Planning and Reporting Section - #24
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
25. SIGNATORY REQUIREMENT. All permit applications, reports or information submitted to the Illinois EPA shall be signed and certified as required by 35 IAC 702.126. (35 IAC 702.151)
26. CONFIDENTIAL INFORMATION. Any claim of confidentiality must be asserted in accordance with 35 IAC 702.103 and 35 IAC 161.
27. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE. The Permittee shall maintain at the facility, until closure is complete, the following documents and amendments, revisions and modifications to these documents:

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- a. Waste analysis plan as required by 35 IAC 724.113(b) and this permit.
 - b. Personnel training documents and records as required by 35 IAC 724.116(d) and this permit.
 - c. Contingency plan as required by 35 IAC 724.153(a) and this permit.
 - d. Closure plan as required by 35 IAC 724.212(a) and this permit.
 - e. Cost estimate for facility closure as required by 35 IAC 724.242(d) and this permit.
 - f. Operating record as required by 35 IAC 724.173 and this permit.
 - g. Inspection schedules as required by 35 IAC 724.115(b) and this permit.
28. WASTE MINIMIZATION. The Permittee shall certify at least annually that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable, and the proposed method of treatment, storage, or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment, in accordance with 35 IAC 724.173(b)(9).

GENERAL FACILITY STANDARDS

29. GENERAL WASTE ANALYSIS. The Permittee shall comply with the procedures described in the approved waste analysis plan. (35 IAC 724.113)
30. SECURITY. The Permittee shall comply with the security provisions of 35 IAC 724.114(b) and (c).
31. GENERAL INSPECTION REQUIREMENTS. The Permittee shall follow the approved inspection schedule. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 35 IAC 724.115(c). Records of inspections shall be kept as required by 35 IAC 724.115(d).
32. PERSONNEL TRAINING. The Permittee shall conduct personnel training as required by 35 IAC 724.116 and shall maintain training documents and records as required by 35 IAC 724.116(d) and (e).

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PREPAREDNESS AND PREVENTION

33. DESIGN AND OPERATION OF FACILITY. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. (35 IAC 724.131)
34. REQUIRED EQUIPMENT. The Permittee shall equip the facility with the equipment set forth in the approved contingency plan, as required by 35 IAC 724.132.
35. TESTING AND MAINTENANCE OF EQUIPMENT. The Permittee shall test and maintain the equipment specified in condition 36 as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities are set forth in the approved inspection schedule. (35 IAC 724.133)
36. ACCESS TO COMMUNICATIONS OR ALARM SYSTEM. The Permittee shall maintain access to the communications or alarm system as required by 35 IAC 724.134.
37. ARRANGEMENTS WITH STATE AND LOCAL AUTHORITIES AND EMERGENCY RESPONSE CONTRACTORS. The Permittee shall attempt to make emergency response arrangements with State and local authorities and agreements with State emergency response teams and emergency response contractors and equipment suppliers as required by 35 IAC 724.137. If State or local officials refuse to enter in preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

CONTINGENCY PLAN

38. IMPLEMENTATION OF PLAN. The provisions of the contingency plan must be carried out by the Permittee immediately whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment (35 IAC 724.151(b)). At a minimum, this includes any fire or explosion which occurs in an area where hazardous waste is being managed (treated, stored or disposed) (35 IAC 703.241). Within 15 days of any incident that requires implementation of the contingency plan, the owner or operator must submit a written report to the Illinois EPA as required by 35 IAC 724.156(j).
39. COPIES OF PLAN. A copy of the contingency plan, including any revisions, must be maintained at the facility and submitted to all local police and fire departments, hospitals and state and local emergency response teams as required by 35 IAC 724.153.

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40. AMENDMENTS TO PLAN. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 35 IAC 724.154.
41. EMERGENCY COORDINATOR. A trained emergency coordinator shall be available at all times in case of an emergency as required by 35 IAC 724.155 and 724.156.

RECORD KEEPING AND REPORTING

42. OPERATING RECORD. The Permittee shall maintain a written operating record at the facility in accordance with 35 IAC 724.173.
43. ANNUAL REPORT. The Permittee shall prepare and submit an annual report to the Illinois EPA prior to March 1st of each year in accordance with the requirements of 35 IAC 724.175.

CLOSURE

44. PERFORMANCE STANDARD. The Permittee shall close the facility as required by 35 IAC 724.211 and in accordance with the approved closure plan.
45. AMENDMENT TO CLOSURE PLAN. The Permittee must amend the closure plan whenever there is a change in the expected year of closure or whenever a change in the facility operation plans or facility design affects the closure plan pursuant to 35 IAC 724.212(c).
46. NOTIFICATION OF CLOSURE. The Permittee shall notify the Illinois EPA at least 60 days prior to the date it expects to begin closure. (35 IAC 724.212(d))
47. TIME ALLOWED FOR CLOSURE. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste and complete closure activities in accordance with the schedule(s) specified in the closure plan. (35 IAC 724.213)
48. DISPOSAL AND/OR DECONTAMINATION OF EQUIPMENT. When closure is completed, the Permittee shall decontaminate and/or dispose of all facility equipment and structures as required by the approved closure (35 IAC 724.214) plan.
49. CERTIFICATION OF CLOSURE. When closure is completed, the Permittee shall submit certification to the Illinois EPA in accordance with 35 IAC 724.215 that the facility has been closed as specified by the approved closure plans.

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Modern Plating Corporation
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April, 2000
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50. COST ESTIMATE FOR FACILITY CLOSURE. The Permittee's original closure cost estimate, prepared in accordance with 35 Ill. Adm. Code 724.242, must be:
- a. Adjusted for inflation either 60 days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with Section 724.243. If the owner/operator is using the financial test or corporate guarantee, it must be updated for inflation within 30 days after close of the firm's fiscal year, and before the submission of updated information to the Illinois EPA as specified in Section 724.243(f).
 - b. Revised no later than 30 days after the Illinois EPA has approved a request to modify the closure plan, if the change in the closure plan increases the cost of closure.
 - c. Kept on record at the facility and updated. (35 Ill. Adm. Code 724.242)
 - d. Made immediately available to Illinois EPA personnel upon Illinois EPA request.
51. FINANCIAL ASSURANCE FOR FACILITY CLOSURE. The Permittee shall demonstrate compliance with 35 IAC 724.243 by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the cost estimates required by the previous Permit Condition. Changes in financial assurance mechanisms must be approved by the Illinois EPA pursuant to 35 IAC 724.243.
52. LIABILITY REQUIREMENTS. The Permittee shall demonstrate continuous compliance with the requirements of 35 IAC 724.247 and the documentation requirements of 35 IAC 724.251.
53. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS. The Permittee shall comply with 35 IAC 724.248 whenever necessary.

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SECTION VI

REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA permit are summarized below. This summary is provided to highlight the various reporting and notification requirements of this permit.

CONDITION	SUBMITTAL	DUE DATE
CAMU Construction, Operation, and Closure		
I.D.10	Notification of deviation of design plans or non-conforming work observed by CQA officer.	Prior to resuming work in the impacted area.
I.E.1	Construction Certification Report	Within 30 days after completing construction and prior to placement of waste in the CAMU.
I.G.2	Notify appropriate state and local officials	Immediately when Contingency Plan is implemented.
I.G.3	Notify appropriate IEMA and IEPA	Within 24 hours of implementing the Contingency Plan.
I.G.5	Documentation that arrangements have been made with local response teams in case of an emergency.	Within 60 days of the effective date of this permit.
I.G.6	Documentation that copies of the Contingency Plan have been provided to local response teams.	Within 60 days of the effective date of this permit.
I.H.2	Plan to protect the CAMU from winter weather.	No later than November 1, 2000 if the CAMU is not closed by that date.

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CONDITION	SUBMITTAL	DUE DATE
I.H.3	File the survey plat with any local zoning authority, or authority with jurisdiction over local land use, and record with land titles.	No later than the date the certification of closure of the CAMU is submitted to the Illinois EPA.
I.H.5	Certification of Closure	Within sixty (60) days after closure, or by January 1, 2001.
I.H.5.a	Certify to Illinois EPA that the notation required in I.H.4.a has been recorded.	Within 60 days after closure, or by January 1, 2001.
I.I.1	Documentation of financial assurance for closure.	Within 30 days of the effective date of this permit.
I.I.2	Documentation of financial assurance for post-closure.	As part of the closure documentation report and closure certification
I.I.3	Documentation of liability insurance.	Within 30 days of the effective date of this permit.
CAMU Post-Closure		
II.F.2	Notify appropriate state and local officials	Immediately when Contingency Plan is implemented.
II.F.3	Notify appropriate IEMA and IEPA	Within 24 hours of implementing the Contingency Plan.
II.G.3	Certify to the Illinois EPA that post-closure care was performed in accordance with the specifications.	Within 60 days after completion of the post-closure care period.
Groundwater Monitoring		

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CONDITION	SUBMITTAL	DUE DATE								
III.D.1	The Well Depth (ft-bgs), Well Depth Elevation (ft-MSL), and Well Screen Interval (ft-MSL).	Within thirty (30) days of the date installation of groundwater monitoring wells MW-20C and MW-23C is completed.								
III.D.3	Notify IEPA if any of the wells identified in Condition III.C.1 are damaged or the structural integrity has been compromised.	Within thirty (30) days of the date the damage is detected.								
III.D.5	Provide Illinois EPA boring logs, construction diagrams and data sheets from new or replacement wells.	Within 30 days of the date installation is complete.								
III.I.2	Groundwater monitoring data required each quarter and statistical calculations.	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;">Samples Collected</td> <td style="width: 50%; vertical-align: top;">Results to</td> </tr> <tr> <td style="text-align: center;"><u>During Months of</u></td> <td style="text-align: center;"><u>Illinois EPA by</u></td> </tr> <tr> <td style="text-align: center;">Second Quarter</td> <td style="text-align: center;">July 15</td> </tr> <tr> <td style="text-align: center;">Fourth Quarter</td> <td style="text-align: center;">January 15</td> </tr> </table>	Samples Collected	Results to	<u>During Months of</u>	<u>Illinois EPA by</u>	Second Quarter	July 15	Fourth Quarter	January 15
Samples Collected	Results to									
<u>During Months of</u>	<u>Illinois EPA by</u>									
Second Quarter	July 15									
Fourth Quarter	January 15									
III.I.3	Semi-annual groundwater surface elevation data.	According to the table in Condition III.I.2								
III.I.4	Groundwater flow rate and direction in the uppermost aquifer.	Annually during the 2nd semi-annual sampling event.								
III.I.5	Surveyed elevation of the top of the well casing ("stick-up")	At time of installation for new wells. For all wells: every 5 years during the 2nd sampling event, at the request of IEPA, or when the elevation changes.								
III.I.6	Elevation of the bottom of each monitoring well.	Annually during the second quarter sampling event.								

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CONDITION	SUBMITTAL	DUE DATE
III.J.1	Apply for permit modification to modify the corrective action monitoring program.	Within 90 days of determining the program no longer meets the requirements of 35 IAC 724.200.
Corrective Action		
IV.D.1	Revised cost estimate	Upon written request by Illinois EPA.
IV.D.2	Documentation of financial assurance	Within 30 days after Illinois EPA's approval of the initial or revised cost estimates required under Condition IV.D.1.
IV.E.1	Notify Illinois EPA in writing of any newly-identified SWMU(s) or release from an existing SWMU.	No later than sixty (60) calendar days after discovery.
IV.E.3	Submit a SWMU Assessment Plan to Illinois EPA.	Within 120 calendar days after receipt of the Illinois EPA request.
IV.E.5	Submit a report documenting the results of the approved SWMU Assessment Plan to the Illinois EPA	In accordance with the schedule in the approved SWMU Assessment Plan.
IV.F.1	Submit detailed information regarding the proposed interim measure to the Illinois EPA for approval.	Prior to implementing any interim measures beyond those specified in this permit.
Standard Conditions		
6	Complete application for new permit.	At least 180 days prior to permit expiration.

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 Modern Plating Corp.
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April, 2000
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CONDITION	SUBMITTAL	DUE DATE
11	Information requested by Illinois EPA and copies of records required to be kept by this permit.	Reasonable time.
14	Notify Illinois EPA of planned physical alterations or additions.	As soon as possible.
15	Construction Certification	Upon construction of a new or modified unit.
16	Notify Illinois EPA of changes which may result in permit noncompliance.	Prior to the planned change.
17	Application for permit modification indicating permit is to be transferred.	90 days prior to the planned change of ownership.
18	Monitoring reports	The intervals specified in the permit.
19	Submission of any information required in a compliance schedule.	Within 14 days after each schedule date.
20	Report to Illinois EPA any non-compliance which may endanger health or environment. By telephone In writing	Within 24 hours after discovery. Within 5 days after discovery.
21	Report all other instances of noncompliance.	At the time monitoring reports, as required by this permit, are submitted
23	Annual Report	March 1 of each year.

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CONDITION	SUBMITTAL	DUE DATE
38	Report to Illinois EPA details regarding incident which required implementation of contingency plan.	Within 15 days after event.
43	Submit annual report required by 35 IAC 724.175.	March 1 of each year.
46	Notify Illinois EPA that expecting to close.	At least 60 days prior to beginning closure.
50(a)	Adjust closure cost estimate for inflation.	Within 30 days after anniversary date.
50(b)	Revision of closure cost estimate.	As needed.
53	Notify Illinois EPA of commencement of voluntary or involuntary bankruptcy proceedings.	Within 10 days after commencement of proceeding.

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ATTACHMENT A

**CONSTRUCTION CERTIFICATION FORM
and INSTRUCTIONS**

MODERN PLATING CORPORATION

1770200010

RCRA LOG NO. B-167

CONSTRUCTION CERTIFICATION

This statement is to be completed by both the responsible officer and the registered professional engineer upon completion of construction in accordance with 35 IAC Section 702.126. Submit one copy of the certification with original signatures and two additional copies (four additional copies for UIC wells). Forward these certification statements and any information required by the permit 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

FACILITY NAME: _____

EPA SITE CODE: _____

U.S. EPA ID NO.: IL _____

PART B PERMIT LOG #/UIC PERMIT #: _____

PERMIT (OR MODIFICATION) ISSUANCE DATE: _____

PERMIT CONDITION NO. REQUIRING CERTIFICATION: _____

The _____ has been constructed in accordance with the specifications in the Part B/UIC Permit. Documentation that the construction was in accordance with the permit is contained in the enclosed report. 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 assure 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.

Signature of Owner/Operator

Name and Title

Signature of Registered P.E.

Name of Registered P.E. and
Illinois Registration Number

Date

(P.E. SEAL)

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 ½, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

THOMAS V. SKINNER, DIRECTOR

DATE: February 23, 1996
TO: Facilities Permitted Under the IEPA RCRA and UIC Programs
FROM: DLPC Permit Section
SUBJECT: Certification Documentation for Construction Required by IEPA-Issued Permits

When submitting certification required by a Part B or UIC permit for construction of any newly developed areas or units, please complete the attached certification form. Modifications to the construction of UIC wells should be certified with this form, but the installation of groundwater monitoring wells does not require this certification (unless specifically required by the permit). This will help to ensure that the submittal reaches its proper destination and that the certification will meet the regulatory requirements. Sending the Field Operations Section (F.O.S.) copy directly to the Field Office is acceptable as long as all copies have a completed copy of the enclosed form attached and you advise the Permit Section, in writing, that a copy has been sent to F.O.S.

A documentation report and as-built drawings (sealed and signed by an Illinois Professional Engineer) must be included with this certification. Information necessary to document the construction of the unit or area and to support the certification must be contained within the report. This report should include a thorough description of all construction data and drawings and should be formatted in a logical and orderly manner. The construction documentation report must contain at least the following items:

1. An introduction and summary which describes the scope and purpose of the project;
2. A description of all construction activities, including quality assurance and quality control;
3. As-built drawings of the area or unit and a description of any deviations from the plans and specifications approved in the permit;
4. A description of the test methods used and justification for any deviations from standard test methods;
5. A summary of test results, identification of any samples which did not meet the specifications and the corrective action and retesting which was undertaken in response to any failing test results;
6. Any necessary information associated with construction of the area or unit to document that construction was in accordance with the plans and specifications approved by the permit;
7. Information specifically required by the permit; and
8. Any available photographs of the area or unit.

If you have any questions, please contact a member of the DLPC Permit Section at 217/782-6762.

WRW:bjh963121S.WPD

Enclosure

ATTACHMENT B

INSPECTION SCHEDULE

MODERN PLATING CORPORATION

1770200010

RCRA LOG NO. B-167

Figure F-1

Modern Plating Corporation
CAMU Landfill
RCRA Part B Inspection Log
for Waste Pile Construction and Operation

Equipment or Area	Description	Activity Description	Frequency	Date	Time	Comments
F-2b(4)(c) - Wind Dispersal	Sludge Waste Piles	1. Check for visible dust generated by winds or vehicular traffic.	Weekly except daily if wind speed exceeds 10 mph. Check continually throughout the day under dry windy conditions.			
Facility Freeboard	Temporary Dewatering Sump	1. Check for proper operation and potential clogging. 2. Check dewatering sump for clogging. 3. Check dewatering pump for proper operation.	Weekly plus after each storm event of 1/2 inch of precipitation or more.			
F-2b(4)(a) Surface Water Management and Erosion Control Structure	Sedimentation Pond	1. Check for erosion; washouts 2. Check water and sediment depth 3. Check outfall water clarity 4. Remove sediments as required to maintain capacity.	For all semiannually and after each storm event of 1/2 inch or more			
	Ditches, Culverts, Spillways, etc.	1. Check for erosion, washouts 2. Check for siltation. 3. Check vegetated areas for washouts, rills, etc.	For all semiannually and after each storm event of 1/2 inch or more			
	Others	1. Check roads for mud tracking. 2. Check roads for washouts.	After each storm event of 1/2 inch or more.			

Revised Figure F-2

Modern Plating Corporation
CAMU Landfill
RCRA Part B Inspection Schedule and Log for Landfill Operations

Electronic Filing: Received, Clerk's Office 02/03/2026

Equipment or Area	Description	Activity Description	Frequency	Date	Time	Comments
F-b(7)(d) Leachate Collection System (LCS)	Side Slope Riser (SSR) Pump and Piping	<ol style="list-style-type: none"> 1. Remove pump and clean pipeline 2. Check for leaks 3. Check for leaks weekly thereafter 4. Service pumps 5. Check pressure transducer for proper operation 6. Check flow meters and pump controls for proper operation 7. Check alarms and alarm lights, etc., for proper operation 	<p>Annually 5 days after start-up, repair leaks within 15 days. As per manufacturer's O&M manual^{1,2} As per manufacturer's O&M manual^{1,2} As per manufacturer's O&M manual^{1,2}</p> <p>15 days</p>			
F-2b(7)(b) Leachate Detection System (LDS)		<ol style="list-style-type: none"> 1. Check liquid levels and remove liquids above pumping level. Record liquid level and leachate quantity in sump.¹ 2. Check liquid levels and remove liquids above pumping level. Refer to 35 IAC 724.403 for frequencies if leakage does not occur. 3. Check pressure transducers for proper operation. 4. Check alarm lights for proper operation. 	<p>Weekly during active site life; monthly after closure.</p> <p>As per manufacturer's O&M manual Weekly during active site life; monthly after closure.</p>			
Geosynthetic Clay Liner (GCL)	Soil Liner/Cap	1. Inspect as per 35 IAC 724.403 and construction CQA plan	During, prior to placement and during covering.			Construction QA/QC activities
Geomembranes	Thermo-plastic Liners	1. Inspect as per 35 IAC 724.403 and construction CQA plan.	During, prior to placement and during covering.			Construction QA/QC activities
Exterior of CAMU Landfill	Berms	<ol style="list-style-type: none"> 1. Check for wet spots and leaks. 2. Check for settlement, slumping or sloughing 3. Check for erosion and bare soil areas. 	<p>Semiannually Semiannually Semiannually and after each major rainfall event</p>			

ATTACHMENT C

CLOSURE CERTIFICATION FORM

MODERN PLATING CORPORATION

1770200010

RCRA LOG NO. B-167

1770200010
Modern Plating Corporation
RCRA Log No. B-167

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

The Corrective Action Management Unit (CAMU) at the Modern Plating facility in Freeport, Illinois as described in RCRA permit application Log No. B-176 has been closed in accordance with the specifications and requirements in the Illinois EPA approved permit application.

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 assure 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.

USEPA ID Number

Facility Name

Signature of Owner

Name and Title

Signature of Operator

Name and Title

Signature of Registered P.E.

Name of Registered P.E. and Illinois
Registration Number

Date

P.E. Seal and
Expiration Date of License

ATTACHMENT D

**CLOSURE & POST CLOSURE
COST ESTIMATES**

MODERN PLATING CORPORATION

1770200010

RCRA LOG NO. B-167

Electronic Filing: Received, Clerk's Office 02/03/2026
Modern Plating Company - CAMU Landfill

Phase 1 Site Development

By: MRS/MLR Date: 1/6/00

Checked By:

Date:

Item	Units	No. of of Units (in-place)	Cost/Unit	Extension
1. Wetland Soil Removal & Stockpiling				
a. Site Clearing	acres (ac)	3	\$1,800	\$5,400
b. Construct berm around Lagoon No.1a	cubic yard (cy)	470	\$10.00	\$4,700
c. Construct berm around Lagoon No.0	cy	240	\$10.00	\$2,400
d. Excavate and stockpile wetland soils	cy	2,130	\$23.00	\$48,990
e. Install geosynthetic cover (tarp) at Lagoon No. 1a	square feet (sf)	14,000	\$0.60	\$8,400
f. Install geosynthetic cover (tarp) at Lagoon No. 0	sf	7,400	\$0.60	\$4,440
g. Construct / remove haul roads	lump sum (ls)	1	\$22,300	\$22,300
2. Initial Site Preparation				
a. Construct berm around temporary Lagoon No.1 storage area	cubic yard (cy)	300	\$10.00	\$3,000
b. Install temporary dewatering sump	lump sum (ls)	1	\$1,000	\$1,000
c. Excavate sludge from Lagoon 2 and place in storage area	cy	4,750	\$23.00	\$109,250
d. Cut/fill to subbase grades	cy	8,000	\$8.00	\$64,000
3. Double Liner System Construction (Phase 1)				
a. GCL installation	square feet (sf)	28,400	\$0.60	\$17,040
b. 60 mil HDPE secondary geomembrane (textured)	sf	28,400	\$0.60	\$17,040
c. Geonet secondary drainage layer	sf	8,300	\$0.45	\$3,735
d. Geocomposite secondary drainage layer (sideslopes)	sf	20,800	\$0.82	\$17,056
e. 50 mil HDPE primary geomembrane (textured)	sf	28,400	\$0.60	\$17,040
f. Geocomposite primary drainage layer	sf	28,400	\$0.82	\$23,288
4. Leachate extraction system construction				
a. Leachate extraction sump & piping	lump sum (ls)	1	\$5,000	\$5,000
b. Leachate pump, controls, valves & flow meter	ls	1	\$10,000	\$10,000
c. Leachate forcemain (double-encased)	lf	60	\$25	\$1,500
d. Pump building	ls	1	\$15,000	\$15,000
5. Filling and closure construction				
a. Excavation and placement of sludge & soil from Lagoon 3	cy	5,310	\$23.00	\$122,130
b. 6" grading layer (imported)	cy	300	\$10.00	\$3,000
c. GCL installation	sf	19,600	\$0.60	\$11,760
d. 40 mil HDPE geomembrane (textured)	sf	19,600	\$0.60	\$11,760
e. 18" rooting zone layer (imported)	cy	900	\$10.00	\$9,000
f. 6" topsoil layer (imported)	cy	400	\$14.00	\$5,600
g. Sedimentation basin construction	ls	1	\$1,000	\$1,000

Electronic Filing: Received, Clerk's Office 02/03/2026
Modern Plating Company - CAMU Landfill

Phase 2 Site Development

By: MRS/MLR Date: 1/6/00

Checked By: Date:

Item	Units	No. of of Units (in-place)	Cost/Unit	Extension
1. Initial Site Preparation				
a. Fill to subbase grades (imported)	cubic yard (cy)	6,070	\$10.00	\$60,700
2. Double Liner System Construction				
a. GCL installation	square feet (sf)	25,400	\$0.60	\$15,240
b. 60 mil HDPE secondary geomembrane (textured)	sf	25,400	\$0.60	\$15,240
c. Geonet secondary drainage layer	sf	7,700	\$0.45	\$3,465
d. Geocomposite secondary drainage layer (sideslopes)	sf	17,700	\$0.82	\$14,514
e. 60 mil HDPE primary geomembrane (textured)	sf	25,400	\$0.60	\$15,240
f. Geocomposite primary drainage layer	sf	25,400	\$0.82	\$20,828
3. Leachate extraction system construction				
a. Leachate extraction sump & piping	lump sum (ls)	1	\$5,000	\$5,000
b. Leachate pump, controls, valves & flow meter	ls	1	\$10,000	\$10,000
4. Filling and closure construction				
a. Wetland soil excavation & placement	cy	2,130	\$8.00	\$17,040
b. Excavation & placement of Lagoon No. 1a & 0 berm soils	cy	710	\$8.00	\$5,680
c. Excavation and placement of sludge from Lagoon No.1	cy	7,220	\$23.00	\$166,060
d. Excavation and placement of sludge from Lagoon No.1a	cy	1,840	\$23.00	\$42,320
e. Excavation and placement of sludge from Lagoon No.0	cy	880	\$23.00	\$20,240
f. Excavation and placement of soil from Shawnee Building	cy	30	\$8.00	\$240
g. Excavation and placement of material from cyanide vault	cy	200	\$8.00	\$1,600
h. 6" grading layer (imported)	cy	600	\$8.00	\$4,800
i. GCL installation	sf	35,700	\$0.60	\$21,420
j. 40 mil HDPE geomembrane (textured)	sf	35,700	\$0.60	\$21,420
k. 18" rooting zone layer (imported)	cy	2,100	\$10.00	\$21,000
l. 6" topsoil layer (imported)	cy	700	\$14.00	\$9,800
m. Sedimentation basin construction	ls	1	\$1,000	\$1,000
n. Seed, fertilizer & mulch	acre	0.82	\$2,500	\$2,050
o. Replacement of fill in excavated areas (lagoons 0 and 1A)	cy	710	\$10.00	\$7,100
p. Topsoil, seed, fertilizer & mulch areas outside berms	acre	1.6	\$5,000	\$8,000
q. Gas venting trench	lineal feet	200	\$15.00	\$3,000
r. Gas vents	each	4.0	\$200	\$800
s. Fencing	lineal feet	950.0	\$15.00	\$14,250

Table I-2
 Annual Long-Term Care Costs Estimate
 Proposed CAMU Landfill
 Modern Plating Corporation

Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$/Year)
1. Site Inspections and Report (annual) (1 per year)	1 per yr	\$1,000 ea	\$1,000
2. Land Surface Care			
+ Erosion Damage Repair (.9 cy/ac/yr on 2 ac)	1.8 cy	\$50/cy	\$90
+ Revegetation and Soil Amendments (assume 10%/yr x 2.0 ac/yr)	.2 ac	\$2,500/ac	\$500
+ Snow Plowing (assume 2 snowfall events)	2 ea	\$200/ea	\$400
3. Leachate Treatment ³	44,000 ⁵ gal/yr	\$0.02/gal	\$880
4. Leachate Hauling ⁴	44,000 gal/yr	\$0.20/gal	\$8,800
5. Environmental Monitoring (semi-annually)			
+ Groundwater (8 wells for metals and 14 wells for VOC, 2 times/year)	2 smpl events per year	\$4,760/event	\$9,520
+ Leak Detection System (LDS) Monitoring (1 location, 12 times/year)	12 events	\$100/event	\$1,200
+ Leachate Monitoring (1 location, 2 time/yr)	2 smpls	\$140/smpl	\$280

Table I-2 (Continued)

Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
♦ Stormwater Monitoring (2 locations, 2 times/year)	4 smpls	\$40/smpl	\$160
6. Mowing (2 ac per year)	2 ac	\$50/ac	\$100
7. Landfill Sump Pump (replace each pump every 5 yrs)	12 pumps	\$1,400/ea	\$560 ²
	Subtotal		\$23,490
	Contingency (10%)		\$2,350
	Total Cost per Year		\$25,840

- ac = acre
- cy = cubic yard
- mil = million
- ea = each
- ft = foot
- gal = gallon
- yr = year
- smpl = sample

Prepared by: REM
Checked by: MRS

¹Annual leachate volume will be estimated and cost calculated during the final design.
²Prorated to an annual cost over the 30-year long-term care period.
³Assumes treatment at a publicly owned wastewater treatment.
⁴Assumes on-site wastewater treatment plant is no longer operating and leachate must be trucked off-site.
⁵Assume leachate generation is equal to the quantity of water generated by the sludge itself.
 As per Appendix N 1,300,000 gal ~ 44,000 gal/yr
 30 yrs

ATTACHMENT E

**POST CLOSURE
INSPECTION & MAINTENANCE SCHEDULE**

MODERN PLATING CORPORATION

1770200010

RCRA LOG NO. B-167

Revised Figure 1-2a

Modern Plating Corporation
 CAMU Landfill
 RCRA Part B Inspection Schedule and Log for
 Post-Closure Period

Equipment or Area	Description	Activity Description	Frequency	Date	Time	Comments
Leachate Collection System (LCS)	Side Slope Riser (SSR) Pump and Piping	<ol style="list-style-type: none"> 1. Remove pump and clean pipeline 2. Check for leaks 3. Check for leaks weekly thereafter 4. Service pumps 5. Check pressure transducer for proper operation 6. Check flow meter and pump controls for proper operation 7. Check alarms and alarm lights for proper operation 	<p>Annually 5 days after start-up, repair leaks within 15 days. As per manufacturer's O&M manual As per manufacturer's O&M manual As per manufacturer's O&M manual Weekly during active life, monthly after closure</p>			
Leachate Detection System (LDS)		<ol style="list-style-type: none"> 1. Check liquid levels and remove liquids above pumping level. Record liquid level and leachate quantity in sump.¹ 2. Check liquid levels and remove liquids above pumping level. Refer to 35 IAC 724.403 for frequencies if leakage does not occur. 3. Check pressure transducers for proper operation 4. Check alarms and alarm lights for proper operation 	<p>Weekly during active site life; monthly after closure. As per manufacturer's O&M manual Weekly during active site life, monthly after closure</p>			
Geosynthetic Clay Liner (GCL)	Soil Liner/Cap	<ol style="list-style-type: none"> 1. Inspect as per 35 IAC 724.403 and construction CQA plan 	<p>During, prior to placement and during covering.</p>			Construction QA/QC activity

Revised Figure I-2a (Continued)

Equipment or Area	Description	Activity Description	Frequency	Date	Time	Comments
Geomembranes	Thermo-plastic Caps	1. Inspect as per 35 IAC 724.403 and construction CQA plan.	During, prior to placement and during covering.			Construction QA/QC activity
Final Cover (completed)	Vegetation of the final surface	1. Check for distress or bare soil areas. 2. Check for erosion. 3. Check slumping, settlement, subsidence, and/or displacement	Semiannually Semiannually and after each major rainfall event. Same as above			
Exterior of CAMU Landfill	Berms	1. Check for wet spots and leaks. 2. Check for settlement, slumping or sloughing 3. Check for erosion and bare sod areas.	Semiannually Semiannually Semiannually and after each major rainfall event			
Final Cover System Function	Geomocomposite Geomembrane	1. Check for clogging and proper function 1. Check areas where settlement or slumping is evident for geomembrane damage	Semiannually and after each rainfall event Semiannually and after each rainfall event			
Run-on and Run-Off Control	Erosion Control Devices	1. Riprap - inspection for washout or undercutting 2. Ditches - inspect for siltation and/or erosion 3. Erosion bales or silt fencing - inspect for washout or undercutting 4. Culverts - inspect for washout/siltation at inlet and outlet	Quarterly and after each major rainfall event. Quarterly and after each major rainfall event. Quarterly and after each major rainfall event. Quarterly and after each major rainfall event.			

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Revised Figure I-2a (Continued)

Equipment or Area	Description	Activity Description	Frequency	Date	Time	Comments
Sedimentation Basins		1. Inspect berms for erosion, scouring and slumping	Quarterly and after each major rainfall event.			
		2. Inspect pond bottom for build-up of sediment	Quarterly and after each major rainfall event.			
		3. Inspect inlet and outlet for erosion and sedimentation	Quarterly and after each major rainfall event.			
		4. Inspect trash rack and rock filter	Quarterly and after each major rainfall event.			
Final Cover Surface	Vegetation	1. Inspection for growth and overall health	Quarterly and after each major rainfall event.			
		2. Evidence of stress	Quarterly and after each major rainfall event.			
		3. Bare spots from erosion, washout or die-offs, etc.	Quarterly and after each major rainfall event.			
Final Cover		1. Erosion resulting in rills, gullies or bare soil.	Quarterly and after each major rainfall event.			
		2. Settlement resulting in loss of grade and/or water standing on the final cover.	Quarterly and after each major rainfall event.			
		3. Slumping or sloughing of final cover.	Quarterly and after each major rainfall event.			
Security Control Devices	Fences, Gates and Locks	1. Inspection for proper function.	Semiannually			
		2. Replace and repair as required	Semiannually			
Gas Venting System	Risers	1. Inspect for plugging.	Semiannually			
Groundwater Monitoring Wells	Protective Tops Well	1. Inspect protective tops and seal for integrity and function	Semiannually			
		2. Record well condition, including well depth, siltation, water depth, well pipe condition and water quality.	Semiannually			

Revised Figure I-2a (Continued)

Equipment or Area	Description	Activity Description	Frequency	Date	Time	Comments
Horizontal and Vertical Control	Benchmarks	1. Check for disturbance and remark (i.e., flag and/or paint).	Annually			

To be compared with the action leakage rate of 4,680 gal/day.

Figure I-2

Modern Plating Corporation
 CAMU Landfill
 Maintenance Plan
 Post-Closure Periods

Equipment or Area	Description	Preventive Maintenance	Corrective Maintenance Procedures	Equipment Requirements	Material Needs
Leachate Collection System (LCS)	Side Slope Riser (SSR) Pump and Piping	<ol style="list-style-type: none"> 1. Service pumps in accordance with the manufacturer's requirements 2. Clean pump according to the manufacturer's recommendations 3. Clean interior piping annually 4. Inspect liquid level sensor as per manufacturer's O&M manual 	<ol style="list-style-type: none"> 1. Refer to O&M manual 2. Repair leaks immediately after they are observed 	<ol style="list-style-type: none"> 1. Refer to O&M Manual 2. Refer to O&M Manual 	Refer to O&M Manuals
Leachate Detection System (LDS)		<ol style="list-style-type: none"> 1. Service pumps in accordance with the manufacturer's requirements 2. Clean pump according to the manufacturer's recommendations 3. Clean interior piping annually 4. Inspect liquid level sensor as per manufacturer's O&M manual 	<ol style="list-style-type: none"> 1. Refer to O&M manual 2. Repair leaks immediately after they are observed 	<ol style="list-style-type: none"> 1. Refer to O&M Manual 2. Refer to O&M Manual 	Refer to O&M Manuals
Final Cover	Surface Water Management System	<ol style="list-style-type: none"> 1. Clean culverts of debris 	<ol style="list-style-type: none"> 1. Correct erosion problems by installing erosion control devices 	Truck, bobcat, shovel	Erosion mat, riprap, topsoil, etc.
	Cover Settlement		<ol style="list-style-type: none"> 1. Fill settled areas and grade to drain 2. Revegetate filled areas 	Truck, small bulldozer, seeder	Fill soil, topsoil, seed, fertilizer and mulch
	Vegetation Final Surface	<ol style="list-style-type: none"> 1. Mow grass semiannually 2. Revegetate bare spots and eroded areas 	<ol style="list-style-type: none"> 1. Repair eroded areas by filling with soil to grading and adding erosion mat prior to seeding 2. Seed, fertilize and mulch 	Truck, small bulldozer, seeder and mower	Fill soil, topsoil, seed, fertilizer, mulch and erosion matting

Figure 1-2 (Continued)

Equipment or Area	Description	Preventive Maintenance	Corrective Maintenance Procedures	Equipment Requirements	Material Needs
Berms	Exterior Berms	<ol style="list-style-type: none"> Mow grass semiannually Revegetate bare spots and eroded areas 	<ol style="list-style-type: none"> Repair eroded areas by filling with soil to grading and adding erosion mat prior to seeding Seed, fertilize and mulch 	Truck, small bulldozer, seeder	Fill soil, topsoil, seed, fertilizer, mulch and erosion matting
Environmental Monitoring Devices	Groundwater Monitoring Wells	<ol style="list-style-type: none"> Mark wells with flag to prevent damage during other maintenance. 	<ol style="list-style-type: none"> Repair/replace broken protector pipes, surface seals and locks 	Shovel	Protector pipes, bentonite lock/key set, PVC pipe
Security Devices	Means to Control Entry Exterior Lighting	<ol style="list-style-type: none"> Repaint rusted or scratched areas. Replace burnt out bulbs. 	<ol style="list-style-type: none"> Repair or replace worn or rusty fences. 	Hand tools	Fence/gate parts and locks
Surface Water Management and Erosion Control Structure	Sedimentation Pond	<ol style="list-style-type: none"> Clean sediment from ponds. Remove debris from pipes and trash rock. 	<ol style="list-style-type: none"> Repair eroded inlet/outlet, dikes, etc. Repair eroded or silted in areas. Clean trash rack, inlet and outlet pipes. 	Backhoe, truck, shovel	Fill soil, erosion control materials (e.g., riprap), pipes
	Ditches, Culverts, Spillways, etc.	<ol style="list-style-type: none"> Clean sediment from ditches. 	<ol style="list-style-type: none"> Replace rusted culverts. Repair eroded areas and install erosion control measures. 	Backhoe, truck, shovels	Fill soil erosion control materials (e.g., riprap), pipes
Access Roads		<ol style="list-style-type: none"> Remove mud tracking. 	<ol style="list-style-type: none"> Repair ruts, pot holes, etc. 	Truck, shovels	Road gravel
Final Cover	Gas Vents	<ol style="list-style-type: none"> Clean vents. 	<ol style="list-style-type: none"> Repair, replace damaged vents and surface seals. 	Shovel	Piping, glue, etc.

ATTACHMENT F

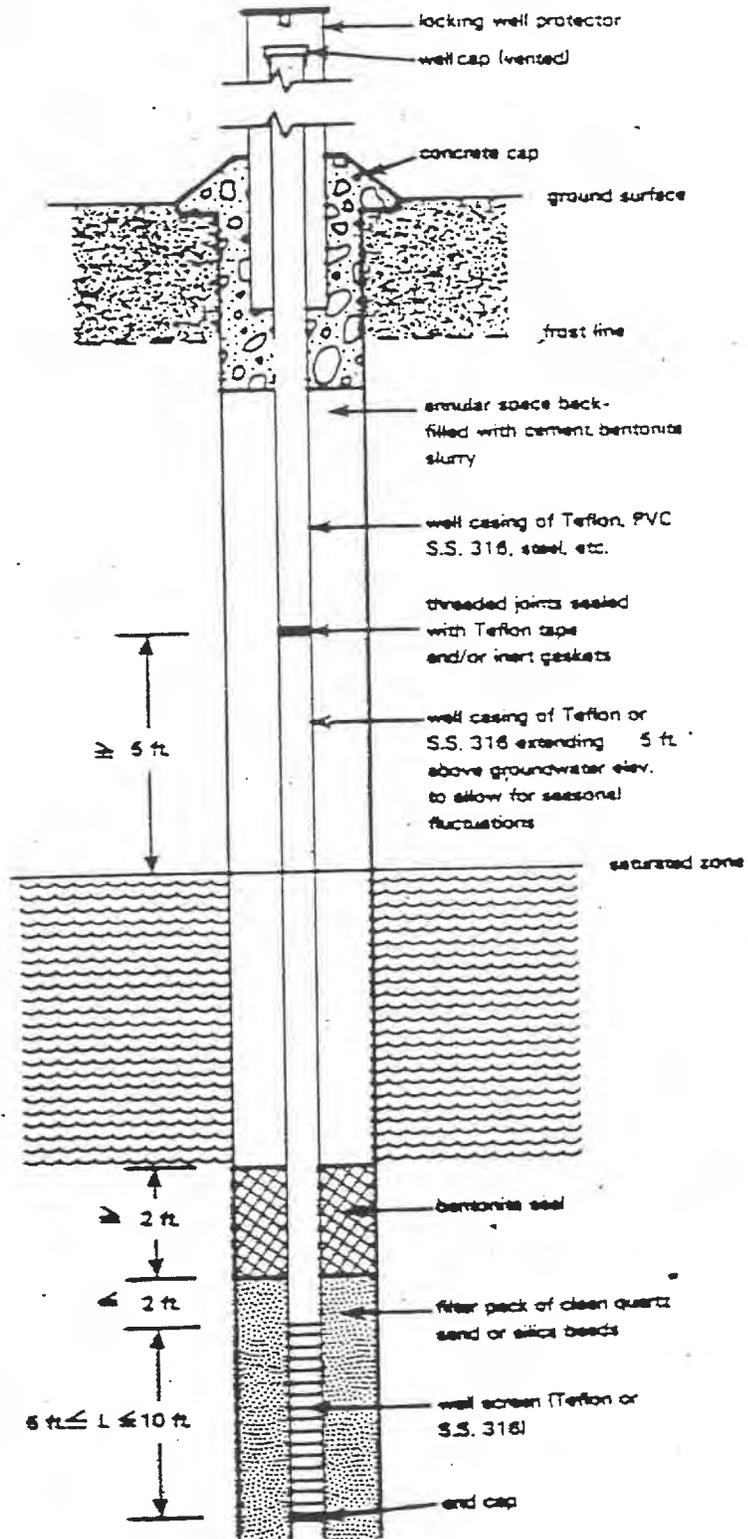
**GROUNDWATER MONITORING PROGRAM
ATTACHMENTS**

MODERN PLATING CORPORATION

1770200010

RCRA LOG NO. B-167

Monitoring Well Diagram





SITE #: _____ COUNTY: _____ WELL #: _____

SITE NAME: _____ BORE-OLE #: _____

STATE _____ PLANE COORDINATE: X _____ Y _____ (N) LATITUDE: _____ ° _____ ' _____ " LONGITUDE: _____ ° _____ ' _____ "

SURVEYED BY: _____ ILL. REGISTRATION #: _____

DRILLING CONTRACTOR: _____ DRILLER: _____

CONSULTING FIRM: _____ GEOLOGIST: _____

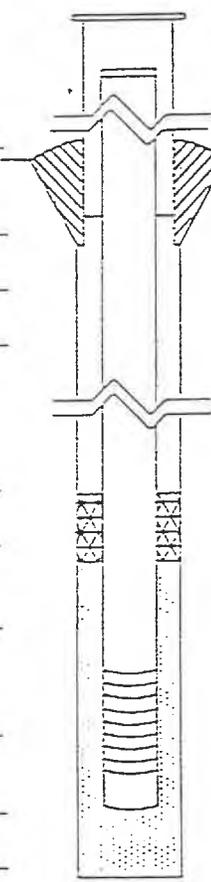
DRILLING METHOD: _____ DRILLING FLUIDS (TYPE): _____

LOGGED BY: _____ DATE STARTED: _____ DATE FINISHED: _____

REPORT FORM COMPLETED BY: _____ DATE: _____

ANNULAR SPACE DETAILS

ELEVATIONS DEPTHS (.01 ft)
(MSL)* (BGS)

TYPE OF SURFACE SEAL: _____		_____	_____	TOP OF PROTECTIVE CASING
TYPE OF ANNULAR SEALANT: _____		_____	_____	TOP OF RISER PIPE
INSTALLATION METHOD: _____		_____	_____	GROUND SURFACE
SETTING TIME: _____		_____	_____	TOP OF ANNULAR SEALANT
TYPE OF BENTONITE SEAL - GRANULAR, PELLET, SLURRY (CIRCLE ONE)		_____	_____	STATIC WATER LEVEL (AFTER COMPLETION)
INSTALLATION METHOD: _____		_____	_____	TOP OF SEAL
SETTING TIME: _____		_____	_____	TOP OF SANDPACK
TYPE OF SAND PACK: _____		_____	_____	TOP OF SCREEN
DRAIN SIZE: _____ (SIEVE SIZE)		_____	_____	BOTTOM OF SCREEN
INSTALLATION METHOD: _____		_____	_____	BOTTOM OF WELL
TYPE OF BACKFILL MATERIAL: _____ (IF APPLICABLE)	_____	_____	BOTTOM OF BOREHOLE	
INSTALLATION METHOD: _____				

* REFERENCED TO A NATIONAL GEODESIC VERTICAL DATUM

WELL CONSTRUCTION

MATERIALS
(CIRCLE ONE)

PROTECTIVE CASING	SS304, SS316, PTFE, PVC OR OTHER:
RISER PIPE ABOVE W.T.	SS304, SS316, PTFE, PVC OR OTHER:
RISER PIPE BELOW W.T.	SS304, SS316, PTFE, PVC OR OTHER:
SCREEN	SS304, SS316, PTFE, PVC OR OTHER:

CASING MEASUREMENTS

DIAMETER OF BOREHOLE (in)	
ID OF RISER PIPE (in)	
PROTECTIVE CASING LENGTH (ft)	
RISER PIPE LENGTH (ft)	
BOTTOM OF SCREEN TO END CAP (ft)	
SCREEN LENGTH (ft: SLOT TO LAST SLOT)	
TOTAL LENGTH OF CASING (ft)	
SCREEN SLOT SIZE **	

TABLE 1
IEPA MONITOR WELL PLUGGING PROCEDURES (test boring)

Well Construction	Plugging Procedure
I-A. ...if backfilled with cement grout above bentonite seal and/or sandpack:	<ol style="list-style-type: none"> 1. Cut casing off at desired depth. 2. Mix neat cement slurry (5 gal. water per 94 lb. bag cement) 3. Insert tremi pipe (1" i.d. pvc) into well and extend to bottom. 4. Slowly pump slurry under low pressure through tremi pipe. 5. Slowly withdraw tremi pipe - making sure bottom of pipe remains below pure slurry 6. Continue slow pumping until all formation water and the watery slurry mix is displaced from top of casing.
I-B. ...if backfilled with soft sediments (cuttings) above bentonite seal and/or sandpack:	<ol style="list-style-type: none"> 1. Knock out and remove thin surface concrete plug, if present. 2. Re-auger entire length of well. 3. Remove well casing from re-augered borehole. 4. Mix neat cement slurry (5 gal. water per 94 lb. bag cement). 5. Insert tremi pipe (1" i.d. pvc) into augers and extend to bottom. 6. Slowly pump slurry under low pressure through tremi pipe. 7. Continue slow pumping until all formation water and the watery slurry mix is displaced from top of casing. 8. Slowly withdraw tremi pipe - making sure bottom of pipe remains below pure slurry. 9. Pull a flight of augers (5' if in unstable materials and hole collapse is likely or 10' if in competent material and collapse is unlikely). 10. Top off cement slurry after each flight is removed.
I-C. ...if monitor well construction is unknown:	<ol style="list-style-type: none"> 1. Follow procedures in I-A.
II-A. ...All bedrock monitor wells:	<ol style="list-style-type: none"> 1. Cut casing off at desired depth. 2. Mix neat cement slurry (5 gal. water per 94 lb. bag cement). 3. Insert tremi-pipe (1" i.d. pvc) into well and extend to bottom. 4. Slowly pump slurry under low pressure through tremi pipe. 5. Slowly withdraw tremi pipe making sure bottom of pipe remains below pure slurry. 6. Continue slow pumping until all formation water and the watery slurry mix is displaced from top of casing.

II. Unconsolidated Sediment Wells

II. Bedrock Wells

RECORD CODE: L | P | C | S | M | 0 | 1
 TRANS CODE: A

REPORT DUE DATE: ___/___/___
36 X D Y 41

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: _____
9 13

MONITOR POINT NUMBER: _____
(see Instructions) 19 21

REGION: _____ CO.: _____

DATE COLLECTED: ___/___/___
23 X D Y 25

FACILITY NAME: _____

FOR NEPA USE ONLY

LAB: _____
23

DATE RECEIVED: ___/___/___
42 X D Y 47

BACKGROUND SAMPLE (X) _____ TIME COLLECTED: ___:___:___
54 (24 Hr. Clock) 55 H M 56

UNABLE TO COLLECT SAMPLE _____
(see Instructions) 53

MONITOR POINT SAMPLED BY: _____
(see Instructions) 50 OTHER (SPECIFY): _____

SAMPLE FIELD FILTERED — INORGANICS (X) _____ ORGANICS (X) _____
51 52

SAMPLE APPEARANCE: _____
53

COLLECTOR COMMENTS: _____
103

LAB COMMENTS: _____
150

RECORD CODE: L | P | C | S | M | 0 | 2
1 7

TRANS CODE: A (COLUMNS 2-25 FROM ABOVE)
3

FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Remarks See Insl.	Replicata	V P A	VALUE
Q TEMP OF WATER (unfiltered °F)	0 0 0 1 1				_____
Q SPED COND (unfiltered umhos)	0 0 0 9 4				_____
Q pH (unfiltered units)	0 0 4 0 0				_____
Q ELEV OF GW SURF (ft ref MSL)	7 1 9 9 3				_____
Q DEPTH OF WATER (ft below LS)	7 2 0 1 9				_____
A BTH WELL ELEV (ft ref MSL)	7 2 0 2 0				_____
Q DEPTH TO WATER FR MEA PT (ft)	7 2 1 0 9				_____

ATTACHMENT 2

**Responses to Comments on the
Draft RCRA POST-CLOSURE PERMIT**

for

Modern Plating Corporation

**1770200010
Log No. B-167**

**1770200010 -- Stephenson County
Modern Plating Corporation
RCRA Log No. B-167**

**Illinois EPA's Response to Comments on Conditions in the Draft
RCRA Post-Closure Permit**

Comment: Section I.C Waste Identification

Condition I.C.1: Waste Identification should be revised to incorporate the remediation wastes from the wetlands and other potential sources at the site that have similar remediation wastes.

Response:

IEPA agrees with the comment provided only remediation wastes (e.g. no production wastes) are placed in the CAMU landfill. Condition I.C.1 was revised as requested.

Comment: Section I.D Design, Construction, and Operating Requirements

Condition I.D.3.c should be revised to omit the requirement that the subbase soils under the GCL have a maximum hydraulic conductivity of 1×10^{-6} cm/sec.

Response:

Section D-6d(1) of the application (page D-20) stated the permeability of the subbase soils would be $< 1 \times 10^{-6}$ cm/sec. Therefore, this requirement was repeated in the permit. In discussions with F&VD, it is my understanding that the underlying concern is that they do not want to test the subbase soils for in-place permeability. In general, IEPA agrees with the comment. The GCL functions as the bottom most low permeability layer in the liner system. The function of the subbase soils is to support and provide protection for this bottom layer of the liner.

However, it is of course desirable to have subbase soils with a permeability that is as low as possible. Density and moisture content are characteristics, which when taken together, will provide a good indication of what the permeability will be in the soil. Page D-20 provides specifications for all of these parameters. Therefore, in response to F&VD's comment, the requirement for the subbase soils to have a maximum hydraulic conductivity has been replaced with the requirement for these soils to have a moisture content between -2% and +2% of the optimum moisture content.

Modern Plating Co. B-167
Response to Comments

Comment: Section I.D Design, Construction, and Operating Requirements

Condition I.D.2 states the slopes of the cover on the CAMU shall not be steeper 6:1. In order to accommodate an increase in volume without enlarging the footprint of the CAMU landfill, F&VD proposed to place contaminated soils around the inside perimeter of the landfill at slopes up to 3:1. The sludges will be placed inside of these perimeter soils. The cover on the sludge will have a slope of no greater than 6:1. The comment requests Condition I.D.2 be revised to allow for the design change to the landfill needed to accommodate the additional remediation wastes from the site.

This comment also refers to the revised design for the landfill described in the revised pages to the application in Attachment 3 to the letter dated February 10, 2000.

Response:

IEPA reviewed the proposed design changes to accommodate the increased volume, and concurs that the condition needs to be revised to address the design change. In general, the revised pages that describe various aspects of the "Contingency Plan for Increased Volume" for the CAMU Landfill were found to adequately describe the proposed design changes to the landfill. The engineering justification for most of these changes is provided in Appendix OO. However, the Factor of Safety (FS) against slope failure for the worst case scenario (a 8 ft. high berm with a 3:1 slope) was 1.45. This is less than the FS required at non hazardous landfills (both inert landfills (35 IAC 811.205(a) and chemical landfills (35 IAC 811.304(d))).

To address the design changes to the landfill to accommodate the increase volume, the wording in Condition I.D.2 was revised to allow a maximum slope of 3:1 on the side slopes of the landfill and specify a minimum FS of 1.5 (static) and 1.3 (seismic). In addition, Conditions I.B and II.B were both revised to identify the permitted volume of the landfill as 17,610 cy (cubic yards) with a maximum volume of approximately 22,800 cy (as described on page D-12 and Appendix OO in the application).

Comment: Section I.E Construction Certification

Conditions I.E.1 requires submittal of a construction certification for the CAMU landfill prior to placement of any waste in it. Condition I.E.2 requires approval of the certification by IEPA prior to placement of waste in the unit. F&VD requested the conditions be modified to 1) indicate the phased construction of the landfill and 2) specify short time frames for inspection and review of the construction documents.

Response:

IEPA concurs with the proposal to specify the phased construction of the landfill in the condition. That is, a construction certification must be submitted and approved for each of the 2 phases (cells) of the landfill before waste can be placed in either cell. IEPA also acknowledges

Modern Plating Co. B-167
Response to Comments

the need for a timely review of the construction certification and documentation reports by IEPA. However, IEPA believe 48 hours is too short a time frame to schedule an inspection, and 3 days may be too short a time to review the construction documentation report. Finally, IEPA needs to be able to prohibit wastes from being placed in a cell if the inspection or review of the construction documentation finds the cell is not properly constructed.

During an April 3, 2000 phone call, Foth & Van Dyke expressed concern about being able to provide all of the information required in the construction certification report and still maintain the construction schedule required to complete the project this construction season. To address this concern, IEPA revised condition I.E.1 to require a Cell Construction Certification (CCC) be provided when a cell is completed (Condition I.E.5 now requires the full construction certification report be provided at the end of construction). The CCC will still require certifications that the cell is constructed in accordance with the requirements in the permit. The CCC will also require an exception report that will identify any (as-built) changes made to the cell. By comparing the CCC to the design in the application and permit, IEPA will be able to verify if the cell was constructed in accordance with the regulations.

To address the comment, as well as IEPA's concerns, the following revisions to this section of the permit will be made:

1. The permit will require MPC to provide an abbreviated form of a construction certification called a Cell Completion Certification (CCC) when each cell is completed
2. MPC will be required to notify IEPA's Regional Office that construction on a cell is expected to be completed at least one week prior to the anticipated completion date of each cell. If this notification is not made, IEPA will not be held to the shortened review time specified below.
3. MPC will be allowed to place waste in a cell if the unit is not inspected within 4 working days from the date the CCC is received by IEPA.
4. If the inspection or review of the closure documentation report finds the cell is not properly constructed the IEPA will notify the permittee that waste is prohibited from being placed in the cell.
5. A full construction certification report will be required within 30 days after all waste is placed in the CAMU landfill and construction is complete.

Modern Plating Co. B-167
Response to Comments

Other Comments

Cost Estimates

The revised permit application pages provided as part of the comments on the draft permit included a revised (increased) closure cost estimate for the landfill. This increase in the closure cost reflects the added costs associated with the increased volume of remediation wastes that may be placed in the landfill. Condition I.I.1 in the permit specifies the amount of financial assurance required for the CAMU landfill and refers to this closure cost estimate. However, the comments on the draft permit in the February 10, 2000 letter from F&VD did not comment on this condition.

Review of the revised permit application pages also revealed that the annual post-closure care cost estimate in Table I-2 had been revised from \$25,840 down to \$16,160. This change is not directly related to the design change of the landfill. Although the post-closure care cost is specified in Condition I.I.2, the proposed decrease in the post-closure cost estimate was not identified as a comment on the permit.

Response

Closure Cost Estimate: Condition I.I.1 and Attachment D of the RCRA Permit will be revised to include the new cost estimates for the construction and closure of the CAMU landfill (\$1,519,726) identified in the revised Appendix DD of the application.

Post-Closure Cost Estimate: The narrative in Section I-6 (revised page I-19) still indicates that it is assumed the on-site WWTP will not be operating (therefore leachate will need to be trucked off-site for treatment). This is an acceptable part of the third party cost estimate (e.g. worst-case scenario) for post-closure care. However, a note in the revised Table I-2 states that it is assumed the on-site WWTP will be operating. This change to Table I-2, a decrease to the Post-Closure Cost Estimate from \$25,840 to \$16,160, is not acceptable because it no longer truly reflects the third party costs for post-closure (and it is inconsistent with the wording in Section I-6 of the application). [**Note:** Table I-2 does not include a revision date.]

Therefore, the Post-Closure Cost estimate of \$25,840 in Attachment D and Condition I.I.2 of the Permit will not be revised because the revision to Table I-2 is not acceptable.

**Comments Associated With Section III of the RCRA Permit
Groundwater Corrective Action Program**

1. FVD requests a modification to the groundwater sampling program to make the program consistent with the program approved in the RCRA Closure Plan. These modifications include:
 - a. Semi-annual sampling of the groundwater monitoring wells listed in the December 2, 1999 Illinois EPA RCRA Closure Plan approval letter.
 - b. Sample collection in the months of December - January and July - August with the submittal of results by the 15th of February and September, respectively. This schedule is proposed since access difficulties have routinely been encountered in sampling the wells in the spring due to high water conditions. The modification to the sampling and submittal dates would make the groundwater sampling more efficient and practical for MPC.

Illinois EPA Comments

- a. The draft Permit reflects the current monitoring program specified in the Illinois EPA letters dated May 25, 1999 and December 2, 1999 with the exception of the change to semi-annual monitoring. Therefore, FVD is merely updating the Permit Application to reflect the current program that will be implemented upon issuance of the Permit.
- b. The guideline, for semi-annual sampling for all RCRA permitted facilities in the State, requires sampling events to occur in the second and fourth quarters of each year. This guideline was established in order to take into account the seasonal variations associated with groundwater. Due to the unique high water conditions and the difficulties accessing groundwater monitoring wells in the wetland area in the spring the Illinois EPA will approve an alternate schedule for the semi-annual sampling events at the facility. However, in order to maintain consistency with established Illinois EPA guidelines, the schedule for sampling events and submittal of results to the Illinois EPA must reflect the established guidelines. The Permit will be revised to reflect the modification to the schedule and allow the semi-annual sampling to occur in the months of January – February and July – August with the submittal of results by April 15 and October 15, respectively.

Modern Plating Co. B-167
Response to Comments

2. Page III-5 of III-11 requests that “within thirty (30) days of the date that installation of groundwater monitoring wells MW-20C and MW-23C is completed, the Permittee shall submit the following information...” FVD reports that groundwater monitoring well MW-20C is an existing well and MW-23C is the proposed well to be constructed and documented. FVD has forwarded information regarding MW-20C to the Illinois EPA. Therefore, FVD requests that the condition concerning the submittal of information on MW-20C be removed.

Illinois EPA Comments

A review of the information submitted by FVD in regard to the construction details associated with well MW-20C have been found to be adequate. Condition III.D.1 will be revised to request information associated with well MW-23C only.

3. To support the revisions requested and update the RCRA Part B Permit Application (Permit Application) the following revisions to the Permit Application are submitted as attachments:
 - a. Revised Section E of the Permit Application, which includes updated Table E-1;
 - b. Revised Drawing No. 20R which shows the revisions to the environmental monitoring plan; and
 - c. The Illinois EPA’s December 2, 1999 RCRA Closure Plan approval letter has been added to Appendix W of the RCRA Permit Application.

Illinois EPA Comments

- a. A comparison of Revised Section E to the: (1) July 1, 1999 Permit Application review memorandum; and (2) December 21, 1999 draft Permit was conducted. The comparison finds that Revised Section E reflects the current monitoring program specified in the Illinois EPA letters dated May 25, 1999 and December 2, 1999 with the exception of the change to semi-annual monitoring reflected in the draft Permit. Therefore, at this time, Revised Section E of the Permit Application has been found to be adequate to update the groundwater monitoring program to reflect the current program that will be implemented upon issuance of the Permit.
- b. Drawing 20R has been revised to reflect the current groundwater monitoring program. Therefore, at this time, Drawing 20R has been found to be adequate.

- c. The addition of the Illinois EPA's December 2, 1999 RCRA Closure Plan approval letter to the Permit Application requires no comment from the Illinois EPA at this time.

ILLINOIS EPA RECOMMENDATIONS

Section III of the Permit has been revised to incorporate the following changes:

1. Condition III.D.1 has been revised to designate which wells are required to be sampled in regard to volatile organic compounds and/or inorganics.
2. The guideline, for semi-annual sampling for all RCRA permitted facilities in the State, requires sampling events to occur in the second and fourth quarters of each year. This guideline was established in order to take into account the seasonal variations associated with groundwater. Due to the unique high water conditions and the difficulties accessing groundwater monitoring wells in the wetland area in the spring the Illinois EPA will approve an alternate schedule for the semi-annual sampling events at the facility. However, in order to maintain consistency with established Illinois EPA guidelines, the schedule for sampling events and submittal of results to the Illinois EPA must reflect the established guidelines. The Permit will be revised to reflect a modification to the schedule and allow the semi-annual sampling to occur in the months of January – February and July – August with the submittal of results by April 15 and October 15, respectively. Condition III.F.4 has been revised to reflect the appropriate months for the semi-annual sampling events.
3. Condition II.H.3 has been revised to address the analytical method proposed for the analysis of volatile organic compounds. U.S. EPA's Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846) Third Edition, Final Update III (SW-846) removed Method 8010B from SW-846 in December of 1996 and replaced the method with Method 8021B. Therefore, SW-846 Method 8021B must be utilized for the analysis of volatile organic compounds.
4. As discussed in Item 2 above, Condition III.I.2 has been revised to reflect semi-annual sampling in the months of January – February and July – August with the submittal of results by April 15 and October 15, respectively.
5. Condition III.I.9 has been revised to remove redundant language.

WRW\mls\002693S.WPD

EXHIBIT B



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-2829
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

DOUGLAS P. SCOTT, DIRECTOR

217/524-3300

May 7, 2009

Certified Mail
7007 0220 0000 0040 6790
7007 0220 0000 0040 6806

Owner

Lucille Miller
Modern Plating Corporation
701 South Hancock Avenue
P.O. Box 838
Freeport, Illinois 61032-0838

Operator

James R. Stenberg
Modern Plating Corporation
701 South Hancock Avenue
P.O. Box 838
Freeport, Illinois 61032-0838

Re: 1770200010 -- Stephenson County
Modern Plating Corporation
ILD 005 172 325
Log No. B-167-M-1, M-2, M-3, M-4, M-5, M-6, M-7, and M-8
RCRA Permit File

Dear Ms. Miller and Mr. Stenberg:

This letter is in response to the requests to modify the RCRA permit for Modern Plating Corporation (Log No. B-167) referenced above by log number. These documents are now identified as part of the approved permit application in the permit.

The Illinois EPA reviewed the information contained in these submittals and determined that the information is acceptable. Therefore, the requests to modify the permit are approved. This determination is based upon our review of the RCRA Part B Permit issued to Modern Plating Corporation (MPC), the regulations [35 Ill. Adm. Code Subtitle G], and the information contained in the submittals. Operations must be conducted in accordance with the approved RCRA Part B Permit and all subsequent modifications.

In response to the permit modification requests, the permit was revised to more accurately reflect the units that were closed, the requirements for the Groundwater Monitoring Zone (GMZ), groundwater monitoring, and the post-closure inspection, monitoring and maintenance of the CAMU the five lagoons and cyanide treatment vault area. A large number of conditions in the permit were revised. Minor typographical errors were corrected and several conditions were removed from the permit because they pertained to the remediation of contaminated areas and the construction of the CAMU. A summary of the revisions made to the permit is provided in Attachment 1 to this letter. A revised RCRA permit is included with this letter as Attachment 2.

Permit Modifications B-167-M-2, M-3, M-4, M-5, M-6, M-7, and M-8 were all considered to be Class 1 or 1* permit modifications. Therefore, pursuant to 35 Ill. Adm. Code 703.281(a)(2), within 90 days of the modification date of this permit Modern Plating Co. must notify persons on

Modern Plating Co.
Permit Modifications B-167-M-1 through M-8
Page 2

the facility mailing list of the changes to the permit identified in the permit modifications B-167-M-2, M-3, M-4, M-5, M-6, M-7, and M-8. Within 120 days of the modification date of this permit Modern Plating Co. must provide documentation to the Illinois EPA Bureau of Land Permit Section that the required notification was made as specified above. At a minimum, this documentation shall include a copy of the letter sent and a copy of the facility mailing list of all people who received the notification

Closure of the CAMU

The original permit issued on April 11, 2000 permitted MPC to construct, operate, and close a corrective action management unit (CAMU). The purpose of the CAMU was to receive remediation waste generated from the closure and corrective actions taken at several hazardous waste management units (HWMUs) and solid waste management units (SWMUs).

Certification of Closure

The Closure Documentation Report submitted in permit modification request B-167-M-3 includes a certification of closure for the CAMU as well as the other HWMUs and SWMUs at the facility. Illinois EPA performed a closure verification inspection of the units on September 13, 2001. This inspection determined that the CAMU had been closed in accordance with the approved closure plan. The approval of modification B-167-M-3 constitutes approval of the certification of closure for the CAMU.

Post-Closure

The post-closure care period for the CAMU began when the closure certification for the CAMU (Closure Documentation Report) was received on August 6, 2001 in permit modification B-167-M-3. Pursuant to 35 Ill. Adm. Code 724.220, Modern Plating Co. is required to submit a certification of completion of post-closure care at the end of the post-closure period.

Certification of Completed Closure/Corrective Action for Other Units

Lagoons 1, 2, 3 and the Shawnee Building, the former hazardous waste management units were subject to the closure requirements of 35 Ill. Adm. Code 725. Subpart G. The solid waste management units, Lagoons 0, Lagoon 1A, the Cyanide Treatment Vault, the Wetlands, Outfall Pipe and Wastewater Release area, required corrective action under 35 Ill. Adm. Code 724.201. Plans to complete closure and/or corrective action of these have been previously approved by Illinois EPA.

Based upon a review of the 2001 August Closure Documentation Report and the verification inspection, closure and/or corrective action has been completed for the aforementioned units subject to the following conditions and modifications:

1. The Shawnee Building, the Wetlands Area and the Wastewater Release Area have been properly remediated.

Modern Plating Co.
Permit Modifications B-167-M-1 through M-8
Page 3

2. Lagoons 0, 1, 1A, 2 and 3 and Cyanide Treatment Vault have been closed as landfills and must receive post-closure care in accordance with Section II of the revised permit. The Survey Plat and Post-Closure Notice requirements of 35 Ill. Adm. Section 724.216 and 724.219 must be met for these units in accordance with Condition IV.C.2. of this permit.
3. An Environmental Land Use Restriction (ELUC) restricting future use of the facility to commercial/industrial activities must be established in accordance with Condition IV.C.1 of this permit (necessary for completing corrective action for the Outfall Pipe).

Compliance with other Laws

Work required by this permit, your application or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Structural Engineering Licensing Act of 1989, and the Professional Geologist Licensing Act. This permit does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

If you have any questions regarding this permit, please contact Rob Watson, P.E. of my staff at 217-524-3265.

Sincerely,



Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land

SFN:WRW:bjh\092401s.doc

WRW JRM TDW

cc: Dale Meyer, U.S. EPA – Region V
Ron Meister, Foth & Van Dyke
Gene Fox, Fehr-Graham & Associates
Jim Meason



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. Box 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 792-2823

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DOUGLAS P. SCOTT, DIRECTOR

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

RCRA POST-CLOSURE PERMIT

IEPA #1770200010 -- Stephenson County
Modern Plating Corporation
ILD #005 172 325
RCRA Permit File
RCRA Log Nos. B-167-M-1, M-2, M-3, M-4,
M-5, M-6, M-7, M-8

Issue Date: April 11, 2000
Effective Date: May 16, 2000
Expiration Date: May 16, 2010
Modification Date: May 7, 2009

Owner

Lucille Miller
Modern Plating Corporation
701 South Hancock Avenue
P.O. Box 838
Freeport, Illinois 61032-0838

Operator

James R. Stenberg
Modern Plating Corporation
701 South Hancock Avenue
P.O. Box 838
Freeport, Illinois 61032-0838

A modified RCRA post-closure permit is hereby issued to Modern Plating Corporation (MPC) as owner and operator to operate and provide post-closure maintenance for a corrective action management unit (CAMU). Only remediation wastes generated during RCRA closure and/or corrective action activities at the Modern Plating facility were placed in the CAMU. The Modern Plating Corporation is located at 701 South Hancock Avenue in Freeport, Illinois.

This permit is issued pursuant to Section 39(d) of the Illinois Environmental Protection Act and Title 35 Illinois Administrative Code (35 Ill. Adm. Code) Subtitle G. This permit consists of the conditions contained herein (including those in any attachments). The Permittee must comply with all terms and conditions of this permit and the applicable regulations contained in 35 Ill. Adm. Code Parts 702, 703, 705 and 720 through 729 in effect on the effective date of this permit.

This permit is issued based on the information submitted in the permit application, and any subsequent amendments (hereafter referred to as the approved permit application). Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 35 Ill. Adm. Code 702.187 and 702.186) and potential enforcement action.

ATTACHMENT 1

**SUMMARY OF CHANGES TO RCRA POST-CLOSURE PERMIT
MODERN PLATING CO.
1770200010**

Modern Plating Co. (B-167)
Summary of Permit Modifications B-167-M-1 to M-8

ATTACHMENT 1

The following is a brief summary of the permit modification requests and the changes made to the RCRA permit for Modern Plating Company (Log No. B-167).

B-167-M-1 : May 17, 2000 Letter from Foth & Van Dyke

This letter requested correction of typographical errors and clarification of the following permit conditions. It was deemed not to be a permit modification.

Conditions I.E.3, I.G.5, IV.C.2, IV.D.1

These conditions were deleted in response to the Closure Documentation Report (Log No. B-167-M-3).

Condition III.A.d

No change was made to this condition.

At the time the GMZ expires, the Permittee may request that the Illinois EPA consider corrective action complete. The petition should include a demonstration that all releases of hazardous waste or hazardous constituents to the groundwater have been remediated to meet the applicable Class I or Class II concentration limits that comprise the groundwater protection standard found in Condition III.E.1 of the permit, and shall also describe how release will be prevented in the future.

Page VI-3

The reference to Condition III.I.2 was revised to make it consistent with this condition in Section III of the permit.

B-167-M-2 : October 31, 2000 Letter from Foth & Van Dyke

This document was submitted in response to Condition I.H.2 of the permit. That condition required the permittee to submit a plan to protect the CAMU from the effects of winter weather if it was not completed by November 1, 2000. The submittal was a Class 1* permit modification. No changes to the permit were made as a result of this submittal. Condition I.H.2 was deleted in response to the Closure Documentation Report (Log No. B-167-M-3).

Modern Plating Co. (B-167)
Summary of Permit Modifications B-167-M-1 to M-8

July 5, 2001 Construction Certification Report (CCR) for the CAMU

This document was submitted in response to Condition I.E.5 of the permit. It was not considered to be a permit modification. Condition I.E.5 required the permittee to certify that the CAMU was constructed in accordance with the permit and approved permit application. No changes to the permit were made as a result of this submittal. Condition I.E.5 was deleted in response to the Closure Documentation Report (Log No. B-167-M-3).

B-167-M-3 : August 3, 2001 Closure Documentation Report for the CAMU

This document was submitted in response to Conditions I.H.5 of the permit. It also addresses the requirements in Conditions I.H.3 and I.H.4. Condition I.H.5 required the permittee to certify that the CAMU was closed in accordance with the permit and approved permit application.

This submittal also documented completion of closure/corrective action efforts for Lagoons 0, 1, 1A, 2 and 3, the Cyanide Treatment Vault, Wetlands, Shawnee Building, Outfall Pipe and the Wastewater Release Area specified in Illinois EPA approval letters.

Certification of Closure

The Closure Documentation Report includes a certification of closure and/or corrective action for the afore-mentioned units at the facility. Approval of modification B-167-M-3 constitutes approval of the certification of closure and/or corrective action for the CAMU and other units.

Additional information to B-167-M-3 dated October 29, 2002 and received November 1, 2002 requested that IEPA eliminate conditions in the April 11, 2000 RCRA permit that do not pertain to the post-closure care of the CAMU, and that the financial assurance for closure of the CAMU be returned.

The revisions to the permit in accordance with this permit modification request were substantial. They are briefly summarized below:

1st Page

The permit modification requests that resulted in this revision to the permit are listed in the permit.

List of Attachments

The Construction Certification Form (Attachment A) and the Inspection Schedule (Attachment B) were deleted because they applied to the construction and operation of the CAMU. The rest of the attachments were re-lettered accordingly. Post-closure inspection of the CAMU is addressed in the re-lettered Attachment B.

Modern Plating Co. (B-167)
Summary of Permit Modifications B-167-M-1 to M-8

Minor Typographical Revisions

The verb tense in many conditions was revised to indicate that certain actions “took place” instead of requiring that they “will take place.” There are too many of these types of revisions to list them all in this summary.

Section I: Design, Construction, Operation & Closure of the CAMU

Conditions I.A & I.B

The term “permanent” was added in front of CAMU in order to clearly identify the permanent nature of this particular unit (not all CAMUs are permanent in nature).

Condition I.B

The total volume of sludge that was actually placed in the CAMU (per the closure documentation report) was inserted at the end of this condition.

Conditions I.C, I.D.3, 7, 8, 9, 10, & 11, I.H.2, I.H.3, I.H.5, and all of Sections I.E, I.F, I.G, I.I

These conditions were deleted because they do not apply to the post-closure care of the CAMU. The remaining Conditions in these Sections were renumbered accordingly.

Condition I.H.1

This condition was revised to reference the Closure Documentation Report dated August 3, 2001.

Section II: Post-Closure Care

Condition II.B, Unit Identification

The following units that were not clean closed were added to this condition/section in order to clearly identify those units that are subject to the post-closure care requirements of RCRA and the permit. These units include: Lagoons 0, 1, 1A, 2, 3, and the cyanide treatment vault area.

Conditions II.C, D, E and F:

The term “. . . units listed in Condition II.B” either replaced, or was added after the term “CAMU” in several portions of these conditions in order to insure that the conditions accurately refer to all of the units subject to post-closure care.

Condition II.C.2

The actual date on which the post-closure care period began was added to this condition. It is August 6, 2001; the date the Illinois EPA received the certification of closure (Closure Documentation Report) for the CAMU.

Modern Plating Co. (B-167)
Summary of Permit Modifications B-167-M-1 to M-8

Condition II.C.4

The requirement for an ELUC as further described in Section IV was added to clarify current requirements.

Condition II.C.5

The grammar in the condition's wording was corrected. The word "will" was replaced with "could" so that the condition now reads . . . "the permittee shall not allow any use . . . that could disturb the integrity. . . ."

Conditions II.C.6. e, f, g

Condition I.D.6 was deleted from Section I, and rewritten as two conditions. These conditions were then placed in Section II as Conditions II.C.6.e and II.C.6.f. Condition II.C.6.g was added in order to more fully describe the operating requirements for the leachate collection system and to specify how the alarm for the leachate collection systems is suppose to operate. Condition II.C.6.g is basically a restatement of the operation of the alarm system as described in the permit application. These conditions were placed in Section II because this is the appropriate location for conditions that pertain to the post-closure operation and monitoring of the CAMU.

Section II D.

The numbering/lettering sequence for Section II inadvertently left subsection II.D out of the 2000 permit. This was corrected and Section II was renumbered / lettered.

Condition II.D.2 (corrected)

The actual date of the first inspection (August 6, 2001) was added to this condition.

Condition II.F.5 (corrected)

This condition was added to the permit. It requires the permittee to notify the people on the facility mailing list that the permit has been changed as a result of these permit modifications.

Condition II.G.1 (corrected)

This condition was revised in order to clarify the financial assurance requirements for the permittee and specify the actual amount of financial assurance that is required pursuant to permit modification request B-167-M-7.

Section III: Groundwater Corrective Action Program

Only minor typographical changes were made to Section III as a result of B-167-M-3.

Section IV: Corrective Action Solid Waste Management Units

Section IV was completely revised to incorporate corrective action activities. General modifications to this section are described below:

Modern Plating Co. (B-167)
Summary of Permit Modifications B-167-M-1 to M-8

In general, Section IV.B. "REMEDIAL EFFORTS COMPLETED TO DATE", was removed and with this modification, the sections were re-sequenced/renamed as follows:

- IV.B. COMPLETED REMEDIAL ACTIVITIES**
- IV.C. REMEDIAL ACTIVITIES THAT MUST STILL BE COMPLETED**
- IV.D. FINANCIAL ASSURANCE FOR CORRECTIVE ACTION**
- IV.E. FUTURE RELEASES FROM SWMUS**
- IV.F. INTERIM MEASURES**

Revisions made to the newly revised section are summarized below:

Condition IV A - INTRODUCTION.

This section was re-numbered, the wording of Condition 1 modified, and certain condition were removed as they were not longer needed or stated elsewhere in the permit (Condition 3, 4 and 6).

Condition IV. B. - COMPLETED REMEDIAL ACTIVITIES

An introductory paragraph was added describing overall remediation/closure activities completed and Figure 2 drawing is referenced and provided in the revised permit depicting the location and extent of remediation effort.

Condition IV .B.1. - Lagoons 0, 1, 1A, 2 and 3 and the Cyanide Treatment Vault Area

Condition IV. B.1.a

The language referencing "electroplating waste" and "CAMU" was revised as proposed by MPC. The Outfall Pipe and Wastewater Release Area were added and these areas are referenced as Areas of Concern.

Condition IV. B.1.d. e. f.

Condition B.1.d.is condition was modified and addresses just engineered barrier requirements. Conditions B.1.e and f were added to address post-closure and survey plat and post-closure notice requirements for the subject units.

Condition IV.B.3. – Wetland Area

This entire condition was revised to describe the excavation activities that took place in four wetland areas. This condition refers to *Figure 2* of the permit provided to show additional information on remediation efforts. It is also stated that no further action is necessary at this SWMU.

Condition IV.B.4 – Outfall Pipe

This condition was added to describe the remediation that occurred in this Area of Concern. It also indicates that efforts were determined to be adequate by an Illinois EPA August 8, 2000

Modern Plating Co. (B-167)
Summary of Permit Modifications B-167-M-1 to M-8

letter provided that an institutional control restricted future land use at the facility to commercial/industrial activities.

Condition IV.B. 5.

This condition was added to describe the remediation that occurred in this Area of Concern.

Condition IV.B.6.

This Condition was previously Condition IV.B.4 and remained the same.

Condition IV. C. - REMEDIAL ACTIVITIES THAT MUST STILL BE COMPLETED

Condition IV. C.1

This condition was added to address the requirement necessary for an Environmental Land use Control (ELUC) for Lagoons 0, 1, 1A, 2 and 3 and the Cyanide Treatment Vault and the Outfall Pipe SB-0F-05 location.

Condition IV.C.2

This condition was added to clarify the Survey Plat requirements still required for the units closing as landfills, Lagoons 1, 2, 3, and the Cyanide Treatment Vault, in accordance with 35 Ill. Adm. Code Section 724.216.

Condition IV.C.3

This condition was added to address the Post-Closure Notice required for the units closing as landfills, Lagoons 1, 2, 3, and the Cyanide Treatment Vault, in accordance with 35 Ill. Adm. Section 724.219.

Condition IV. D. - FINANCIAL ASSURANCE FOR CORRECTIVE ACTION

This condition was added back in as a cost-estimate and financial assurance is still required for any corrective measures needed or required under Subsection IV.E. - Future Releases. Currently all corrective action has been completed and no financial assurance for corrective action is required.

Condition IV.E. FUTURE RELEASES FROM SWMUS

No revision

Condition IV.F. INTERIM MEASURES

No revision

Section V: Standard Conditions

Only minor typographical changes were made to Section V as a result of B-167-M-3.

Modern Plating Co. (B-167)
Summary of Permit Modifications B-167-M-1 to M-8

Section VI: Reporting and Notification Requirements

Section VI was revised to reflect the changes to the permit identified above in Sections I, II, III, IV, and V.

B-167-M-4 : October 29, 2002 letter from Foth & Van Dyke

This letter requests Condition III.H.3 be revised because the laboratory that analyzes the groundwater is no longer able to perform the Method 8021B specified in the condition. USEPA's SW-846 Methods has been updated and Method 8620 is now used for the analysis of volatile organic compounds (VOCs). The submittal was a Class 1* permit modification.

Condition III.H.3 was revised as requested in B-167-M-4 and now reads:

Samples shall be analyzed according to the procedures specified in Section E of the approved permit application and/or USEPA's SW-846 Methods (latest version).

B-167-M-5 : January 10, 2003 letter from Modern Plating Co.

This letter requests the name of the operator listed on the permit be changed from Craig Skolrood to James R. Stenberg because Mr. Skolrood has retired from MPC. The modification request was a Class 1* permit modification. Pursuant to Section 39i of the Environmental Protection Act, the new operator was required to complete a prior conduct certification.

The name of the operator listed on the RCRA permit was revised as requested.

B-167-M-6 : September 8, 2003 letter from Foth & Van Dyke

This letter requests the post-closure inspection schedule and log in the permit be changed in several locations to reflect the closure of the CAMU. The modification request was a Class 1 permit modification.

The Post-Closure Inspection Schedule & Log in Attachment B (old Attachment E) to the RCRA permit were revised as requested. The Post-Closure Maintenance Plan (also in old Attachment E) was not revised.

B-167-M-7 : December 12, 2003 letter from Jim Meason

This letter dated December 12, 2003 and received December 23, 2003 requests the amount of financial assurance required for post-closure care be revised (decreased) to account for the

Modern Plating Co. (B-167)
Summary of Permit Modifications B-167-M-1 to M-8

amount of the time the facility has been in the post-closure care period (e.g. from August 6, 2001 to present). The modification request was a Class 1* permit modification.

A revised permit modification dated February 23, 2004 and received March 2, 2004 replaced (superseded) the initial modification request. This submittal included the required signatures from the owner and operator, as well as references to the courtesy copy of the unfinished permit emailed to MPC on December 31, 2003.

The initial amount of financial assurance required for the facility was \$775,200 and was based on an annual amount of \$25,840 (in 2000 dollars). As a result of permit modification request B-167-M-7, the amount of financial assurance required for post-closure care of the facility was increased to current (2006) dollars to account for inflation, and decreased to account for the 5 years the facility has already spent in the post-closure care period. The revised amount of financial assurance required for the facility is \$735,061.40 (in 2006 dollars).

NOTE: The amount of financial assurance and the way of calculating it that was approved in M-7 was superseded by permit modification M-8.

Comments on Permit : February 23, 2004 letter from Jim Meason

On December 31, 2003, the Agency emailed MPC a copy of the revised (unfinished) permit as a professional courtesy.

On March 1, 2004 IEPA received a list of comments on the December 31, 2003 copy of the permit. The comments received in response to it were not considered to be a permit modification request because the Agency was under no legal obligation to provide MPC with a courtesy copy of the unfinished permit or respond to the comments made on the permit.

The following is a brief summary of IEPA's responses to the comments in the February 23, 2004 letter:

Comments on RCRA Post-Closure Permit Cover Letter

The suggested revisions were made to the permit. In addition, the first sentence of the cover letter was also revised to state that a "modified" RCRA permit is being granted.

Comments on RCRA Post-Closure Permit

Modern Plating Co. (B-167)
Summary of Permit Modifications B-167-M-1 to M-8

Section I

Condition I.A: The purpose of this paragraph is to indicate that the closure of the surface impoundments was addressed under the closure plan for the units (a separate document) and not this RCRA permit.

Condition I.B: The sentence that refers to placement of sludge in Lagoons 1 and 3 was deleted, and the last sentence revised to refer to the "in-place volume."

Section I.D: The numbering was checked to make sure there are 6 conditions within this section.

Condition I.D.1: The last sentence of the condition was revised to refer to the CAMU in the approved permit application *and this permit*. The sentence is valid and applicable. It prohibits change to the CAMU – including the constructed/closed CAMU - without prior Agency approval.

Condition I.D.2: The tenses of the verbs in this condition were changed to past tense to reflect the fact that the CAMU is already constructed.

Conditions I.E.(2)(d) and I.E.(4)(3): The recommended typographical changes were made. Items (1), (2), and (3) under Condition I.E.4 were also changed to a, b, and c.

Section II

Condition II.B: Condition II.B was revised to identify the regulatory classification (hazardous waste management unit (HWMU) or solid waste management unit (SWMU)) of each of the units subject to post-closure care. However, no units were removed from Condition II.B as requested in this comment.

Condition IV.B.1.d of the revised permit states, "Clean closure was not the goal of remediation efforts at the Lagoons or the Cyanide Treatment Tank Area." These units were not clean closed. Therefore, Condition II.B identified them as the units to which post-closure care applied. The Shawnee building and wetlands were "clean closed", and thus not subject to the post-closure requirements in the permit.

Condition II.C.2: The requested typographical changes were made.

Condition II.E.1: The requested correction was made to the permit.

Condition II.E.2: The condition will remain in the permit and the suggested changes will be made to the wording of the condition.

Modern Plating Co. (B-167)
Summary of Permit Modifications B-167-M-1 to M-8

Condition II.G.5: The requested change was made. In addition, the reference to “effective date of the permit” was revised to “modification date of the permit.” This is necessary because the effective date of the permit will not change as a result of these modifications to the permit. However, a new date, the “modification date” will be added to the permit, and it is this new date that triggers the requirement for MPC to notify the people on the mailing list.

Condition II.H.1: This condition will be revised to reference the total amount of financial assurance required for the facility. The wording of the condition will also be revised to reference the calculations for the amount of financial assurance required for this facility in Attachment A to this permit.

Section III

The subparagraphs under III.A were revised from a – d to 1 – 4.

Section IV

Subsection A was reviewed to insure the numbering is correct.

Condition IV.B.1.a: We considered MPC’s reference to Condition C.1.a to be a typo. The reference to electroplating waste and CAMU was revised as suggested by MPC. The condition was also revised to more clearly identify the additional areas that were remediated. However, the exact wording suggested by MPC was not used.

In order to further clarify the remedial actions that occurred at the site, the last portion of Condition IV.B titled **Additional Remediation Activities** was incorporated into Condition IV.B as items 4 and 5. A sentence indicating that the remediation efforts at each additional site were considered adequate was added to the end of each condition. Finally, Conditions IV.B.4 and IV.B.5 were renumbered as #6 and #7.

Section V

No comments were made on Section V of the permit.

Section VI

Revised Figure I-2a

Final Cover Inspection: The third item on page 2 (Final Cover) was deleted as suggested by MPC since it is essentially duplicated by the inspection items under “Final Cover Surface” on page 3, (2nd and 3rd items).

Modern Plating Co. (B-167)
Summary of Permit Modifications B-167-M-1 to M-8

Financial Assurance

The financial assurance required in the permit was revised to reflect the amount calculated pursuant to permit modification request B-167-M-7. Please refer to the above comments regarding Condition II.G.1.

Lucille Miller Letter

It is unclear which letter is being referenced as the "Lucille Miller Letter." However, the cover letter in general, and the introduction to Attachment 1 of the cover letter were revised to omit references to the consultants who submitted many of the permit modification requests on behalf of MPC.

The information for permit modification B-167-M-7 was revised to indicate the date of the letter, and when it was received.

The description of the revisions to the permit as a result of modification request B-167-M-7 was revised to indicate the amount MPC is required to meet in order to comply with the financial assurance requirements.

B-167-M-8 : December 14, 2006 letter from Jim Meason

This letter requested the post-closure cost estimate be revised. It also requested the method used to calculate the financial assurance approved in B-167-M-7 be revised. The modifications requested were considered Class 1* permit modifications.

Cost Estimate: The requested changes to the cost estimate were addressed as follows:

- The request to delete the 10% contingency cost was not approved.
- The request to delete the cost for surface water monitoring was not approved.
- The request to change the volume of leachate generated from the CAMU to a 3 year rolling average based on the last three years was approved. The volume of 7,680 gallons indicated in the modification request will be used for the current post-closure cost estimate in 2008 dollars.
- The revised annual post-closure cost estimate that resulted from this permit modification request is \$17,050 (in 2008 dollars). Permit Condition II.G.1 was revised to reflect this amount.
- Permit Conditions II.G.2 and G.3 were added to Section II.G of the permit because using a rolling average will necessitate changing the value of the post-closure cost estimate that is listed in the permit every year. That is, MPC's request resulted in a permit condition that requires them to submit a permit modification to revise their cost estimate each year.

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Summary of Permit Modifications B-167-M-1 to M-8

Financial Assurance: Because MPC requested, and is now approved to revise the post-closure cost estimate every year, it is no longer necessary to perform the complicated calculations proposed by MPC to pro-rate the amount of financial assurance required. Instead, it will be a simple matter of multiplying the annual post-closure cost in the current year dollars that MPC will provide each year (e.g. 2008 dollars in the current permit) by the years left in the 30 year post-closure care period. In this case, there are 22 years remaining.

So, the total amount of post-closure care financial assurance that should be required of MPC in the revised permit is: $\$17,050 \times 22 \text{ yrs} = \$375,100$ (2008 dollars). This is more than a 50% decrease in the amount of financial assurance required for the facility.

Permit Condition II.G.4 was added to indicate that MPC is allowed to calculate financial assurance based on the number of years remaining in the post-closure care period. If MPC chooses to do this, they will need to send in a permit modification request to revise the amount of financial assurance.

Finally, two new conditions in a new section II.H were to the permit to address the 39i certification requirements.

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ATTACHMENT 2

**Revised RCRA Permit for
Modern Plating Corporation
1770200010**

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Approved Permit Application

The permit application approved by this permit consists of the documents listed below:

<u>DOCUMENT</u>	<u>DATED</u>	<u>RECEIVED</u>
Application	December 1, 1999	December 2, 1999
Comments on Draft Permit	February 10, 2000	February 14, 2000
Revised pages to application	March 10, 2000	March 13, 2000
Revised pages to application	April 5, 2000	April 6, 2000
Permit Modification B-167-M-1	May 17, 2000	May 25, 2000
Permit Modification B-167-M-2	October 31, 2000	November 1, 2000
Construction Documentation Report	July 5, 2001	July 9, 2001
Permit Modification B-167-M-3	August 3, 2001	August 6, 2001
Additional Information for B-167-M-3	October 29, 2002	November 1, 2002
Additional Information for B-167-M-3	December 6, 2002	December 9, 2002
Additional Information for B-167-M-3	December 13, 2002	December 16, 2002
Permit Modification B-167-M-4	October 29, 2002	November 4, 2002
Permit Modification B-167-M-5	January 10, 2003	January 15, 2003
Permit Modification B-167-M-6	September 8, 2003	September 9, 2003
Permit Modification B-167-M-7	December 12, 2003	December 23, 2003
Additional Information for B-167-M-7	February 23, 2004	March 2, 2004
Comments on Courtesy Copies of Permit	February 23, 2004	March 1, 2004
	January 28, 2006	January 28, 2006
	April 4, 2006	April 4, 2006
	June 12, 2006	June 12, 2006
Permit Modification B-167-M-8	December 14, 2006	December 19, 2006
Additional Information for B-167-M-8	June 24, 2008	June 27, 2008
Additional Information for B-167-M-8	July 29, 2008	July 31, 2008
Additional Information for B-167-M-8	October 27, 2008	October 30, 2008

If you have any questions regarding this permit, please contact Rob Watson, P.E. at 217/524-3300.

Sincerely,



Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land

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cc: ^{WRW JMN TBN} Dale Meyer, U.S. EPA – Region V
Ron Meister, Foth & Van Dyke
Gene Fox, Fehr-Graham & Associates
Jim Meason

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SECTION I

DESIGN, CONSTRUCTION, OPERATION, & CLOSURE of the CORRECTIVE ACTION MANAGEMENT UNIT

A. AUTHORIZATION OF CAMU

For the purpose of implementing remedies under 35 IAC 724.201, the Illinois EPA designated a new unit at the Modern Plating facility as a permanent Corrective Action Management Unit (CAMU), as defined in 35 IAC 720.110. The design, construction, operation, and maintenance of the CAMU shall be conducted in accordance with the approved permit application, the requirements contained in this permit, and the regulations at 35 IAC 724.652. Placement of remediation waste into or within a CAMU does not constitute land disposal of hazardous wastes. Consolidation or placement of remediation wastes into or within a CAMU does not constitute creation of a unit subject to minimum technology standards.

B. UNIT IDENTIFICATION

The general location of the permanent CAMU is shown in Figure 1 of this permit. The CAMU is located north of the wastewater treatment plant and was constructed in the same location that Lagoons 2 and 3 used to occupy. The CAMU is about 1.2 acres in size and holds remediation wastes generated from the closure and remediation of hazardous waste and solid waste management units at the Modern Plating facility. The permitted volume of the landfill was 17,610 cy (cubic yards) with a maximum volume of approximately 22,800 cy. The total in-place volume of sludge and soil actually in the CAMU is approximately 14,500 cy.

C. WASTE IDENTIFICATION

1. The Permittee was only allowed to place the following types of remediation wastes in the CAMU: Electroplating Sludge (F006) and soils contaminated with cadmium, chromium, cyanide, and trichloroethylene (F002). This included soils from the lagoons, shawnee building, cyanide vault, wetlands areas, outfall pipeline areas, and any other areas where similar remediation wastes were located during the closure and corrective actions at the facility.

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2. The Permittee is prohibited from placing wastes in the CAMU that are not included in Condition C.1 above without prior authorization from the Illinois EPA via a permit modification.

D. DESIGN, CONSTRUCTION, AND OPERATING REQUIREMENTS

1. The Permittee constructed, operated, and maintained the CAMU in accordance with the plans and specifications contained in the approved permit application and the conditions in this permit. Any changes to the CAMU described in the approved permit application and this permit shall be pre-approved by the Illinois EPA before they can be implemented by the permittee.
2. The horizontal extent and location of the CAMU is identified in Figure 1 of this permit. The CAMU was constructed above elevation 757.0. The sumps in the CAMU were constructed above elevation 753.5. The interior side slopes in the CAMU are not steeper than 3:1 (3 feet horizontal to 1 foot vertical). The slopes of the final cover on the CAMU are not steeper than 3:1 on the perimeter slopes constructed of contaminated soils, and not steeper than 6:1 for the areas covering sludge. The CAMU was designed and constructed to achieve a minimum static slope factor of safety greater than or equal to 1.5 and a seismic factor of safety greater than or equal to 1.3. Any modification to these design parameters shall be the subject of a permit modification.
3. The liner system on the bottom and sides of the CAMU was constructed of the following layers, described from the top to bottom:
 - Geocomposite drainage material (high density polyethylene (HDPE) drainage net sandwiched between two layers of geotextile material) with a minimum transmissivity of $3 \times 10^{-5} \text{ m}^2/\text{sec}$
 - 60 mil HDPE geomembrane (textured on both sides)
 - HDPE drainage net (geocomposite on the side slopes) with a minimum transmissivity of $3 \times 10^{-5} \text{ m}^2/\text{sec}$
 - 60 mil HDPE geomembrane (textured on both sides)
 - Geosynthetic clay liner (GCL)
4. The cover system on the top of the CAMU was constructed of the following layers, described from the top to bottom:
 - 6 inches of topsoil (vegetative layer)
 - 18 inches of cover soil (rooting layer)
 - Geocomposite drainage material (HDPE drainage net sandwiched between two layers of geotextile material)

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- 40 mil HDPE geomembrane (textured on both sides)
 - Geosynthetic clay liner (GCL)
 - 6 inches of grading/venting layer
5. The leachate collection and removal system is designed and operated to ensure that the depth of leachate over the liner does not exceed more than 1 foot (30 cm).
 6. The Permittee shall provide groundwater monitoring for the CAMU in accordance with the approved permit application, and with Section III of this permit.

E. CLOSURE

1. The CAMU was closed in accordance with the approved permit application and the conditions in this permit. The closure of the CAMU was documented in the Closure Documentation Report dated August 3, 2001 and received August 6, 2001 (Log No. B-167-M-3). The approval of permit modification B-167-M-3 constitutes approval of the certification of closure for the CAMU.
2. A survey plat indicating the location and dimensions of the CAMU and any other hazardous waste disposal units with respect to permanently surveyed benchmarks was prepared and certified by a professional land surveyor. The notes on the plat state the owner's and operator's obligation to restrict disturbance of the CAMU in accordance with the applicable Subpart G regulations. These notes state:
 - a. The CAMU contains remediation wastes generated during the closure of hazardous waste and solid waste units at the Modern Plating facility in accordance with an Illinois EPA approved closure plan (Log No. C-259-M-8).
 - b. The waste materials contained in the CAMU are considered RCRA hazardous wastes. They include electroplating sludges (F006), wastes with trichloroethylene (F002), and wastes containing cadmium, chromium, and cyanide.
 - c. Any fill material removed from the CAMU during future activities must be managed as a hazardous waste in accordance with 35 Ill. Adm. Code Subtitle G: Waste Disposal.
 - d. The use of this area is restricted.
3. The Plat of Survey (PIN 18-14-32-402-019) and Drawing No. 2 provided in Appendix J of the August 2001 Closure Documentation Report were filed with the Stephenson County Recorders Office in Freeport, IL on July 26, 2001. The record data is Document

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No. 200100016096, Box 15, pages 111-116 (each 11" x 17" drawing was recorded as 3 separate 8.5" x 11" pages).

The Plat of Survey was attached to the deed to the property and serves as an instrument which is normally examined during title search that will in perpetuity notify any potential purchaser of the property that:

- (a) The waste material in the CAMU is considered a RCRA hazardous waste;
- (b) Use of the area is restricted; and
- (c) A survey plat and record of the type, location and quantity of waste material in the CAMU was filed with the IEPA and the County Recorder.

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SECTION II

POST-CLOSURE CARE

A. SUMMARY

A hazardous waste management unit where waste is left in place must receive post-closure care for at least 30 years after the unit is closed. Activities required during post-closure care include, but are not limited to (1) maintenance of final cover, (2) monitoring of the groundwater, and (3) providing financial assurance for post-closure activities pursuant to 35 IAC Part 724.

B. UNIT IDENTIFICATION

The Permittee shall provide post-closure care for the Corrective Action Management Unit (CAMU) in accordance with the approved permit application and the conditions of this permit. The capacity of the CAMU is approximately 14,500 cubic yards and contains electroplating sludge (F006), soil contaminated with trichloroethylene (F002), and soils contaminated with cadmium, chromium and cyanide.

C. MONITORING, MAINTENANCE, AND RECORDKEEPING

1. The Permittee shall implement the Post-Closure Plan contained in the Approved Permit Application. All post-closure care activities shall be conducted in accordance with the provisions of the approved permit application and the conditions in this permit.
2. The post-closure care period shall begin on August 6, 2001, the date of completion of closure of the unit listed in Condition II.B of this permit (the date the permittee submitted the certification of closure to the Illinois EPA) and continue for thirty (30) years after that date.
3. The Permittee shall maintain the components, structures, and equipment at the site in accordance with the maintenance plan in Attachment B of this permit.
4. The Illinois EPA may include restrictions upon the future use of the site if necessary to protect public health and the environment, including permanent prohibition of the use of the site for purposes which may create an unreasonable risk of injury to human health or the environment. After administrative and judicial challenges to such

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restrictions have been exhausted, the Illinois EPA shall file such restrictions of record in the Office of the Recorder of the county in which the unit is located.

5. The Permittee shall not allow any use of the CAMU listed in Condition II.B of this permit that could disturb the integrity of the final cover system, any component of the containment system, or the function of the facility's monitoring systems during the post-closure care period unless such use is necessary to protect public health or the environment.
6. The permittee shall comply with the requirements for landfills at the CAMU as follows:
 - a. Maintain the integrity and effectiveness of the final cover system, including making repairs as necessary to correct the effects of settling, subsidence, erosion, cracking or other events.

Corrective action shall be taken if ponding water is observed, if cracks or erosion channels greater than one inch wide have formed for whatever reason, if gas, odor, vegetative or vector problems arise, if leachate popouts or seeps are present, or if vegetation with tap roots is found to be growing in areas which are not designed to accommodate such.

- b. Prevent run-on and run-off from eroding or otherwise damaging the final cover system.
- c. Maintain and monitor the groundwater monitoring system in accordance with the approved permit application and Section III of this permit.
- d. Protect and maintain surveyed benchmarks used in complying with surveying and recordkeeping requirements.
- e. The leachate collection and removal system for the CAMU shall be operated and maintained such that the depth of leachate over the liner in Phase 1 and Phase 2 of the CAMU does not exceed more than 1 foot (30 cm).
- f. The leachate collection system pumps for the CAMU shall be operated and maintained such that they automatically turn on if leachate in the Phase 1 or Phase 2 sumps reaches an elevation of 757.0 feet as indicated on Drawing 11 in the approved permit application.

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- g. The leachate collection system for the CAMU shall be operated and maintained such that the leachate pump alarms in Phase 1 and Phase 2 of the CAMU are activated if the leachate in either of the sumps reaches an elevation of 758.0 feet.

D. INSPECTIONS

1. The Permittee shall inspect the components, structures, and equipment associated with the CAMU listed in Condition II.B of this permit in accordance with the inspection schedule in Attachment B of this permit. The term "major rainfall event" as used in the inspection schedule shall be defined as any storm event of ½ inch of rain or more.
2. The date of the first inspection was on August 6, 2001; the date the Closure Documentation Report for the CAMU was submitted to the Illinois EPA Bureau of Land Permit Section.
3. The Permittee shall continue to follow the inspection procedures in Condition II.D.1 above until the post-closure care period for the CAMU listed in Condition II.B of this permit has ended.

E. CONTINGENCY PLAN

1. A release of hazardous waste or hazardous constituents from the CAMU shall constitute an incident that requires implementation of the Contingency Plan.
2. When the Contingency Plan is implemented, the permittee shall immediately notify either the local government official designated as the on-scene coordinator for that geographical area, or the National Response Center (using their toll free number 800-424-8803). The following information must be provided:

Name and telephone number of reporter;
Name and address of facility;
Time and type of incident (release, fire or explosion);
Name and quantity of material involved, to the extent known;
The extent of injuries, if any; and
The possible hazards to human health or the environment outside the facility.
3. Within 24 hours of implementation of the Contingency Plan, the Permittee shall also contact the Illinois Emergency Management Agency (IEMA), the Illinois EPA, Bureau of Land, Regional Office in Rockford, IL and Permit Section (in addition to the other entities identified in the permit application).

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4. Any incident associated with the CAMU that requires implementation of the contingency plan shall be recorded in the facilities operating record in an incident log that is maintained separate from the facility's other operating records. The incident log must include a copy of each incident report. In addition to the information identified in the approved application, the incident report must include, the cause of the release and the measures taken to correct the situation and prevent a reoccurrence.

F. NOTICES AND CERTIFICATION

1. A request to change the Post-Closure Plan must be submitted in the form of a permit modification request. This request must be in accordance with applicable requirements of 35 Ill. Adm. Code Parts 702, 703 and 724 and must include a copy of the amended Post-Closure Plan for approval by the Illinois EPA.
2. If the Permittee or any subsequent owner or operator of the land upon which the CAMU listed in Condition II.B above is located wishes to remove hazardous waste, hazardous waste residue, the liner, or contaminated soil, they must request a modification to this RCRA post-closure permit in accordance with the applicable requirements in 35 IAC Parts 703, 705 and 724. At a minimum, the owner or operator must demonstrate that the removal of such material will satisfy the criteria of 35 IAC 724.217(c).
3. No later than sixty (60) days after completion of the established post-closure care period for the CAMU listed in Condition II.B of this permit, the Permittee shall submit to the Illinois EPA Bureau of Land Permit Section by registered mail, a certification that the post-closure care for the CAMU was performed in accordance with the specifications in the approved post-closure plan in the approved permit application and the conditions in this permit. The owner and operator and an independent registered professional engineer must sign the certification. Documentation supporting the independent registered professional engineer's certification must be furnished to the Illinois EPA upon request until the Illinois EPA releases the Permittee from the financial assurance requirements for post-closure care.
4. Within 60 days after receiving certifications from the owner or operator and an independent registered professional engineer that the post-closure care period has been completed for the CAMU listed in Condition II.B of this permit in accordance with the approved post-closure plan, the Agency shall notify the owner or operator that it is no longer required to maintain financial assurance for post-closure care of that unit unless the Illinois EPA determines that post-closure care has not been in accordance with the approved post-closure plan. The Illinois EPA shall provide the owner or operator with a detailed written statement of any such determination that post-closure care has not been in accordance with the approved post-closure plan.

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5. Within 90 days of the modification date of this permit, the permittee shall notify persons on the facility mailing list of the changes to the permit identified in the permit modification B-167-M-2, M-3, M-4, M-5, M-6, M-7 and M-8. Within 120 days of the modification date, the permittee shall provide documentation to the Illinois EPA Bureau of Land Permit Section that the required notification was made as specified above. At a minimum, this documentation shall include a copy of the letter sent and a copy of the facility mailing list of all people who received the notification.

G. FINANCIAL ASSURANCE

1. The permittee shall maintain financial assurance for post-closure care of the CAMU of at least \$375,100 (in 2008 dollars). The annual cost estimate for post-closure care, and calculations for the amount of financial assurance required for this facility are shown in Attachment A to this permit. The amount of the post-closure financial assurance shall be sufficient to meet the requirements at 35 Ill. Adm. Code 724.244 and 724.245.
2. The volume of leachate used in the post-closure care cost estimate in Attachment A of this permit shall be based on a 3 year rolling average of the total volume of leachate generated from the CAMU during the previous three years.
3. On or before October 1st of each year the permittee shall submit a permit modification to update the post-closure cost estimate and amount of financial assurance by incorporating the volume of leachate generated in the past year into the 3 year rolling average. The submittal needs to identify the volume of leachate generated in both Phase I and Phase II of the CAMU for each year. The annual amount of leachate generated from the CAMU shall be totaled on September 1st of each year. The leachate data from 2003 through the current year shall be submitted with the permit modification request.
4. The permittee is allowed to calculate the amount of financial assurance that is required each year by multiplying the number of years remaining in the post-closure care period by the annual post-closure cost estimate that is revised each year per Conditions II.G.2 and G.3 above. If the permittee chooses to modify the financial assurance in this way, a permit modification request to do so must be submitted on or before October 1st of each year with the updated post-closure cost estimate and financial assurance required in Condition II.G.3 above.

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H. 39i Certification Forms

1. The permittee is required to complete and provide the following 39i Certification forms to the Illinois EPA Bureau of Land:
 - a. A 39i (legal entity) certification form must be filled out for the legal entity (i.e. Company) that appears on the permit application being submitted, and
 - b. A 39i (individual) form must be filled out for the individual that signs the 39i (legal entity) certification form, and
 - c. A 39i (individual) form must be filled out for each individual who signs the permit application.

Note: If the applicant wants additional staff to be able to send in future modifications, certifications, etc. those individuals should also send in an individual 39i certification form.

2. The permittee shall submit the necessary 39i certification form(s) and supporting documentation within 30 days of any of the following events:
 - a. The owner or operator, or officer of the owner or operator, or any employee who has control over operating decisions regarding the facility has violated federal, State, or local laws, regulations, standards, or ordinances in the operation of waste management facilities or sites; or
 - b. The owner or operator, or officer of the owner or operator, or any employee who has control over operating decisions regarding the facility has been convicted in this or another State of any crime which is a felony under the laws of this State, or conviction of a felony in a federal court; or
 - c. The owner or operator, or officer of the owner or operator, or any employee who has control over operating decisions regarding the facility has committed an act of gross carelessness or incompetence in handling, storing, processing, transporting, or disposing of waste.
 - d. A new person is associated with the owner or operator who can sign the permit application or who has control over operating decisions regarding the facility, such as a corporate officer or a delegated employee.

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The 39i certification must describe the violation(s), convictions, carelessness, or incompetence as outlined in (a), (b), or (c) above and must include the date that a new person as described in (d) above began employment with the applicant.

The 39i certification form and supporting documentation shall be submitted to the address specified below:

Illinois Environmental Protection Agency
Bureau of Land #33 – 39i Certification
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

[The 39i certification forms will be treated as confidential by the Agency. The applicant may also request the information on the 39i certification form be maintained confidential in accordance with 2 IAC 1828.]

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SECTION III

GROUNDWATER CORRECTIVE ACTION PROGRAM

A. SUMMARY

Hazardous waste constituents have been detected in groundwater monitoring wells, at the MPC facility, in the vicinity of HWMUs and SWMUs above the groundwater protection standard and background values. Therefore, a corrective action program meeting the requirements of 35 Ill. Adm. Code 724.200 must be implemented at the MPC facility in Freeport, Illinois.

The groundwater corrective action program required by this Permit includes:

1. The construction of the CAMU which serves as the corrective action and subsequently the basis for the establishment of the Groundwater Management Zone (GMZ).
2. Determining the quality of groundwater, within the GMZ and in the vicinity of the MPC facility, by comparing analytical results for the specified hazardous constituents to the concentration limits that comprise the groundwater protection standard.
3. Evaluating the effectiveness of the corrective action based on the quality of groundwater within the GMZ and in the vicinity of the MPC facility.
4. The postponement of the establishment and monitoring of the point of compliance until the monitoring wells in the program have attained the applicable concentration limits that comprise the groundwater protection standard and the GMZ expires. The compliance period (post-closure period) during which the groundwater protection standard applies shall be extended until it can be demonstrated that the groundwater protection standard has not been exceeded at the point of compliance for three consecutive years.

B. DEFINITIONS

As used herein, the words or phrases set forth below shall have the following definitions:

1. "Uppermost Aquifer" refers to the geologic formation nearest the natural ground surface that is an aquifer, as well as lower aquifers that are hydraulically connected with this aquifer in the vicinity of the facility. The uppermost aquifer in the vicinity of

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the MPC facility has been identified as the unconsolidated aquifer consisting of permeable alluvial sand and gravel.

2. "GMZ" refers to the three (3) dimensional region containing groundwater being managed to mitigate impairment caused by the release of contaminants from a site.
3. "Point of Compliance" refers to the vertical surface located at the hydraulically down-gradient limits of the waste management area (the CAMU) extending down into the uppermost aquifer underlying the regulated unit.
4. "Ft - bgs" refers to the number of feet below the ground surface.
5. "Ft-MSL" refers to the number of feet below the ground surface referenced to mean sea level.
6. "Detected" shall mean a concentration equal to or above the PQL listed in USEPA's SW-846 (Third Edition) for the applicable analytical methods specified in the approved Sampling and Analysis Procedures, which are incorporated by reference in Condition III.H of the Permit.
7. "Progressive Increase" shall mean an increase in the concentration of a constituent in successive sampling events.
8. "Stick-up" refers to the height of the reference survey datum. This point is determined within ± 0.01 foot in relation to mean sea level, which in turn is established by reference to an established National Geodetic Vertical Datum.

C. IMPLEMENTATION

1. The Permittee shall begin implementation of the correction action program upon the effective date of this Permit. On that date, the groundwater monitoring and corrective action requirements set forth in this Permit shall supersede those established in the 35 Ill. Adm. Code Part 725 interim status closure and post-closure plan previously approved by the Illinois EPA.
2. The Permittee shall carry out the corrective action monitoring program specified in this Permit on the groundwater beneath the MPC facility in Freeport, Illinois. The uppermost aquifer in the vicinity of the MPC facility has been identified as the unconsolidated aquifer consisting of permeable alluvial sand and gravel.

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3. Groundwater monitoring wells at the facility are identified as A through E, referring to the specific screened intervals. These are:
 - A: Screened in the water table in the upper portion of the unconsolidated materials
 - B: Screened in the lower portion of the unconsolidated materials
 - C: Screened at the surface of the dolomite aquifer
 - D: Screened 20 feet (ft) into the dolomite
 - E: Screened 40 ft into the dolomite

For the purposes of this Permit and in accordance with 35 Ill. Adm. Code Part 620 regulations: (1) the unconsolidated materials have been designated Class II: General Resource Groundwater; and (2) the dolomite aquifer has been designated Class I: Potable Resource Groundwater. The analytical results obtained from these groundwater monitoring wells shall be compared to the appropriate Class I or Class II concentration limits that comprise the groundwater protection standard found in Condition III.E.1.

4. At this time, the establishment of the point of compliance will be postponed until such time that the monitoring wells at the facility have attained the applicable concentration limits that comprise the groundwater protection standard found in Condition III.E.1 and the GMZ expires. At that time, MPC must submit a proposal for the establishment of a point of compliance which satisfies the regulatory requirements found in 35 Ill. Adm. Code 724, Subpart F and reflects the current conditions at the facility.

D. WELL AND SUMP LOCATIONS AND CONSTRUCTION

1. The Permittee shall maintain the groundwater monitoring wells identified in the table below to allow for the collection of groundwater samples. The location of these wells is specified in Drawing No. 20R of the approved permit application.

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<u>IEPA Well No.</u>	<u>MPC Well No.</u>	<u>Well Depth (ft-bgs)</u>	<u>Well Depth Elevation (ft MSL)</u>	<u>Well Screen Interval (ft MSL)</u>
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"A" Groundwater Monitoring Wells

G06S	MW-6A V	12.5	742.1	747.1 - 742.1
G07S	MW-7A V	12.5	740.7	745.7 - 740.7
G08S	MW-8A V	13.0	741.4	746.4 - 741.4
G09S	MW-9A I	23.0	745.8	755.8 - 745.8
G10S	MW-10A I	21.5	743.8	753.8 - 743.8
G11S	MW-11A	12.0	742.4	747.7 - 742.7
G12S	MW-12A I	12.0	741.6	746.6 - 741.6
G13S	MW-13A I	12.2	740.6	745.9 - 740.9
G14S	MW-14A I	18.5	740.1	751.6 - 741.6
G15S	MW-15A I	12.0	743.8	749.1 - 744.1
G17S	MW-17A	17.9	737.9	743.8 - 738.8
G18S	MW-18A	16.0	738.6	743.6 - 738.6
G19S	MW-19A	14.0	740.7	745.7 - 740.7
GA1S	MW-21A I	25.8	747.2	757.2 - 747.2
GA2S	MW-22A I	25.8	748.4	758.4 - 748.5

"B" Groundwater Monitoring Wells

G06U	MW-6B	27.0	727.5	737.5 - 727.5
G07U	MW-7B	27.0	726.2	736.2 - 726.2
G12U	MW-12B V	28.0	725.6	735.6 - 725.6
G13U	MW-13B V	28.0	724.8	734.8 - 724.8
G14U	MW-14B V	22.4	736.2	741.6 - 736.6
G15U*	MW-15B*VI	31.2	724.6	734.6 - 724.6
G17U*	MW-17B*VI	37.2	718.8	729.3 - 719.3
G18U*	MW-18B*VI	37.4	717.3	727.3 - 717.3
G19U	MW-19B VI	36.9	717.9	727.9 - 717.9

"C" Groundwater Monitoring Wells

G05M	MW-5C V	23.0	755.1	760.1 - 755.1
G06M	MW-6C V	43.5	710.9	715.9 - 710.9
G07M	MW-7C	40.0	713.3	718.3 - 713.3
G08M	MW-8C V	72.0	682.7	687.7 - 682.7
G11M	MW-11C V	66.3	688.0	693.8 - 688.8

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G12M	MW-12C	53.0	700.6	705.6 - 700.6
G13M	MW-13C	84.0	669.0	674.0 - 669.0
G14M	MW-14C V	80.5	678.3	683.3 - 678.3
G15M*	MW-15C*VI	104.5	651.2	657.7 - 652.7
G16M*+	MW-16C*+VI	29.0	752.6	764.6 - 754.6
G17M*	MW-17C*VI	108.0	648.0	653.0 - 648.0
G19M*	MW-19C*VI	110.3	644.6	650.6 - 644.6
GA0M	MW-20C I	27.0	740.3	742.3 - 752.3
GA1M	MW-21C	57.3	715.8	772.5 - 717.5
GA2M	MW-22C	62.5	711.8	718.5 - 713.5
GA3M*	MW-23C*VI			

"D" Groundwater Monitoring Wells

G05L	MW-5D I	40.0	738.2	749.5 - 739.5
G07L	MW-7D V	50.0	703.3	713.3 - 703.3
G17L*	MW-17D*VI	121.1	634.8	644.8 - 634.8
G18L*	MW-18D*VI	146.6	608.0	615.0 - 608.0
G19L*	MW-19D*VI	149.9	604.7	616.7 - 604.7

"E" Groundwater Monitoring Wells

G11D	MW-11E	101.0	653.3	665.8 - 655.8
G12D	MW-12E	87.2	666.3	676.3 - 666.3
G13D	MW-13E	117.9	634.9	645.8 - 635.8
G14D	MW-14E	114.0	644.7	654.7 - 644.7

River Sampling Points

S201	PR-1	VI	NA	NA	NA
S102	PR-2	VI	NA	NA	NA

Notes:

1. + - Denotes Upgradient Well
2. * - Denotes GMZ Wells
3. V - Analysis of Volatile Organic Compounds listed in Condition III.E.1
4. I - Analysis of Inorganic constituents listed in Condition III.E.1
5. NA - Not applicable

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2. Construction of each monitoring well/piezometer must be in accordance with the diagram contained in Attachment C to this Permit or details and diagrams approved by the Illinois EPA. All new monitoring wells/piezometers to be installed must be continuously sampled and logged on Illinois EPA boring logs as shown in Attachment C unless otherwise approved by the Illinois EPA.
3. The Permittee shall notify the Illinois EPA within thirty (30) days in writing if any of the wells identified in Condition III.D.1 are damaged or the structural integrity has been compromised. A proposal for the replacement of the subject well shall accompany this notification. The well shall not be plugged until the new well is on-line and monitoring data has been obtained and verified, unless the well is extremely damaged or would create a potential route for groundwater contamination. Prior to replacing the subject well, the Permittee shall obtain written approval from the Illinois EPA regarding the proposed installation procedures and construction.
4. Should any well become consistently dry or unserviceable, a replacement well shall be provided within ten (10) feet of the existing well. This well shall monitor the same zone as the existing well and be constructed in accordance with the current Illinois EPA groundwater monitor well construction standards at the time that the well is replaced. A replacement well which is more than ten (10) feet from the existing well or which does not monitor the same geologic zone must be approved by the Illinois EPA and designated as a new well.
5. The Permittee shall submit boring logs, construction diagrams, and data sheets from installation and development of a new or replacement well to the Illinois EPA at the address below within thirty (30) days of the date that the installation of the well is completed. In addition, the Permittee shall submit certification that plugging and abandonment of a well was carried out in accordance with the approved procedures to the Illinois EPA at the address below within thirty (30) days of the date that the well is plugged and abandoned. All information should be submitted to the appropriate State Agencies.

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

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6. All wells/piezometers shall be equipped with protective caps and locks. Monitoring wells or piezometers located in high traffic areas must be protected with bumper guards.
7. All groundwater monitoring wells and piezometers not utilized in the approved groundwater monitoring system, but retained by the facility, must be constructed and maintained in accordance with 77 Ill. Adm. Code 920 regulations. Monitoring wells and piezometers that are improperly constructed must be abandoned in accordance with Condition III.D.3.

E. GROUNDWATER PROTECTION STANDARD

1. The following hazardous constituents and concentration limits comprise the groundwater protection standard in the vicinity of the MPC facility. (Total (unfiltered) values, derived from the applicable USEPA SW-846 (Third Edition) method, will be used for comparison with the concentration limits)

<u>Field Parameters</u>	<u>Storet</u>	<u>Units</u>
pH	00400	
Specific Conductance	00094	micromhos/cm
Temperature of Water Sample	00011	(°F)
Turbidity	45626	Ntus
Depth to Water (below land surface)	72019	Feet
Depth to Water (below measuring point)	72109	Feet
Elevation of Groundwater Surface	71993	Ft MSL
Elevation of Bottom of Well #	72020	Ft MSL
Elevation of Measuring Point (Top of casing) ##	72110	Ft MSL

- # Shall be determined during the second sampling event each year
 ## Shall be surveyed once every five (5) years, or at the request of the Illinois EPA, or whenever the elevation changes as required by Condition III.I.5.

<u>Hazardous Waste Constituents</u>	<u>Storet Number</u>	<u>Concentration Limits (mg/l)</u>	
		<u>Class I</u>	<u>Class II</u>

Volatile Organic Compounds

Tetrachloroethylene	34475	0.005	0.025
Trichloroethene	39180	0.005	0.025

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Cis-1,2-Dichloroethene	77093	0.07	0.2
Vinyl Chloride	39175	0.002	0.01

Inorganics (Totals)

Cadmium	01027	0.005	0.05
Chromium	01034	0.1	1.0
Lead	01051	0.0075	0.1
Nickel	01067	0.1	2.0

2. Alternate concentration limits may be established where the Permittee can determine a constituent will not pose a substantial hazard to human health or the environment.
 - a. Where a hazardous constituent has a standard in 35 Ill. Adm. Code 620, the facility must apply for an adjusted standard as outlined in Section 28.1 of the Environmental Protection Act.
 - b. For those hazardous constituents without a 35 Ill. Adm. Code 620 standard, the alternative concentration limits proposed by the facility must be approved by the Illinois EPA.
3. The compliance period (post-closure period) during which the groundwater protection standard applies shall be extended until the Permittee demonstrates that the groundwater protection standard has not been exceeded at the point of compliance for three consecutive years.

F. CORRECTIVE ACTION PROGRAM

The Permittee shall conduct the corrective action program and perform groundwater monitoring detailed in this section, in accordance with the following:

1. Upon initiation of the corrective action program the GMZ shall be monitored and maintained. The GMZ is delineated by the groundwater monitoring wells found in Condition III.D.1.
 - a. The results of monitoring the GMZ shall be submitted to the Illinois EPA semi-annually in accordance with the schedule found in Condition III.I.2.
 - b. The GMZ expires when all groundwater monitoring wells within the GMZ have attained the appropriate Class I or Class II concentration limits that comprise the groundwater protection standard found in Condition III.E.1.

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4. Samples collected during the first and third quarters shall be analyzed for the constituents identified in Condition III.E.1.
5. The Permittee shall determine the groundwater flow rate and direction in the uppermost aquifer at least annually from the monitoring wells listed in Condition III.D.1.
6. The Permittee shall evaluate the results of the analyses required by Condition III.F.3 above and identify:
 - a. The concentration of any organic constituent detected which is equal to or greater than the appropriate concentration limit listed in Condition III.E.1.
 - b. The concentration of any total (unfiltered) inorganic constituent detected which is equal to or greater than the appropriate concentration limit listed in Condition III.E.1.
 - c. The concentration of any constituent detected which was not detected during the previous sampling event.
 - d. The concentration of any constituent which exhibits a progressive increase over two (2) consecutive sampling events.

G. GROUNDWATER ELEVATIONS

1. The Permittee shall determine the groundwater surface elevation referenced to MSL at each well each time groundwater is sampled in accordance with Condition III.I.3.
2. The Permittee shall determine the surveyed evaluation of the "stick-up" referenced to MSL once every five (5) years, or at the request of the Illinois EPA, or whenever the elevation changes in accordance with Condition III.I.5.
3. Elevation, as referenced to MSL, of the bottom of each monitoring well (Storet 72020) is to be reported at least annually. The mandatory measurement shall be taken during the second semi-annual sampling event each year.

H. SAMPLING AND ANALYSIS PROCEDURES

The Permittee shall use the techniques and procedures described in Section E of the approved permit application, except as modified below, when obtaining and analyzing samples from the groundwater monitoring wells described in Condition III.D.1 above:

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1. Samples shall be collected by the techniques described in Section E of the approved permit application.
2. Samples shall be preserved, shipped, and handled in accordance with the procedures specified in Section E of the approved permit application.
3. Samples shall be analyzed according to the procedures specified in Section E of the approved permit application and/or USEPA's SW-846 Methods (latest version).
4. Samples shall be tracked and controlled using the chain of custody procedures specified in Section E of the approved permit application.

I. REPORTING AND RECORDKEEPING

1. The Permittee shall enter all monitoring, testing and analytical data obtained in accordance with Conditions III.E, III.F, and III.G in the operating record.
2. Samples collected to meet the requirements of the groundwater monitoring program described in Conditions III.E and III.F shall be collected and reported, as identified in the table below. The result of the analyses conducted on the groundwater quality samples shall be submitted in accordance with this schedule. All additional data collected for the groundwater monitoring program (as specified in Conditions III.E, III.F, and III.G) shall also be submitted to the Illinois EPA in accordance with this schedule.

<u>Samples to be Collected During the Months of</u>	<u>Results Submitted to the Illinois EPA by the Following</u>	<u>Constituents</u>
First Quarter	April 15	III.E.1
Third Quarter	October 15	III.E.1

3. Groundwater surface elevation data, measured pursuant to Condition III.G.1 shall be collected at least semi-annually and submitted to the Illinois EPA as identified in the table above.
4. The Permittee shall report the groundwater flow rate and direction in the uppermost aquifer, as required by Condition III.F.5 during the second semi-annual sampling event of each year.

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5. The Permittee shall report the surveyed elevation, as required by Condition III.G.2, of the top of the well casing ("stick-up"), referenced to MSL, in accordance with the following schedule:
 - a. For wells identified in Condition III.D.1 above, every five years (during the second sampling event), or at the request of the Illinois EPA, or whenever the elevation changes. The initial "re-survey" of these wells shall be conducted during the second semi-annual sampling event following the effective date of the Permit.
 - b. For any new wells, at the time of installation and reported in the as-built diagrams. Subsequent measurements shall be made every five years (during the second quarter sampling event) or whenever the elevation changes.
6. Elevation of the bottom of each monitoring well identified in Condition III.D.1, referenced to MSL, is to be reported annually. This measurement shall be taken during the second quarter sampling event. (Storet 72020)
7. The Permittee shall submit a completed "RCRA Facility Groundwater, Leachate and Gas Reporting Form" (LPC 592) as a cover sheet for any notices or reports required by the Permit for identification purposes. Only one copy of the LPC 592 must accompany your submittal. However, the Permittee must submit one (1) original and (excluding the groundwater and leachate monitoring results submitted in an electronic format) a minimum of two (2) of each notice or report you submit to the Illinois EPA. The form is not to be used for Permit modification requests.
8. Information required by Conditions III.I.2, III.I.3, III.I.5, and III.I.6 shall be submitted in an electronic format. The information is to be submitted as fixed-width text files formatted as found in Attachment C in accordance with the schedule found in Condition III.I.2. Additional guidance regarding the submittal of information in an electronic format can be found at www.epa.state.il.us/land.
9. The Permittee shall report all information to the Illinois EPA in a form that can be easily reviewed. All submittals must contain tables of data, drawings, and text (as necessary) to accurately describe the information contained in the submittal.
10. The Permittee shall submit a written report to the Illinois EPA, in accordance with the schedule found in Condition III.I.2 above, which discusses the effectiveness of the corrective action program.

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J. REQUEST FOR PERMIT MODIFICATION

1. If the Permittee determines that the corrective action monitoring program no longer satisfies the requirements of 35 Ill. Adm. Code 724.200, then within ninety (90) days, the Permittee must submit an application for a permit modification to the Bureau of Land of the Illinois EPA to make any appropriate changes to the program which will satisfy the regulations.
2. Conditions in this section of the Permit may be modified in accordance with 35 Ill. Adm. Code 705.128 if there is cause for such modification, as defined in 35 Ill. Adm. Code 702.184. Causes for modification identified in this section include, but are not limited to, alterations to the permitted facility, additional information that would have justified the application of different permit conditions at the time of issuance, and new regulations.

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SECTION IV

CORRECTIVE ACTION ON HAZARDOUS WASTE AND SOLID WASTE MANAGEMENT UNITS

A. INTRODUCTION

In accordance with Section 3004 of RCRA and 35 Ill. Adm. Code 724.201, the Permittee, Modern Plating Corporation, shall institute such corrective action as necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents, listed in 35 Ill. Adm. Code 721 Appendix H and any solid waste management unit at their facility in Freeport, Illinois.

1. Modern Plating Corporation (MPC) has addressed soil and groundwater contamination associated with RCRA closure and/or corrective action needed at the MPC facility. On August 3, 2001 a Closure Documentation Report (Log No. B-167-M-3) was submitted that addressed closure of the following hazardous waste management units (HWMUs): (1) the CAMU; (2) Lagoons 1, 2, 3 and: (3) the Shawnee Building. It also addressed completion of corrective action at the following solid waste management units (SWMUs) and/or areas of concern: (1) Lagoons 0 and 1A; (2) Cyanide Treatment Vault; (3) the Wetlands; (4) Outfall Pipe; and (5) Wastewater Release Area. Figure 2 of the permit shows the location of these units within the facility. This closure documentation report is being approved with conditions and modifications herein.
2. The Permittee must provide corrective action, as appropriate, for any newly-identified SWMUs discovered at the facility.
3. The requirements of 35 Ill. Adm. Code 742 Tiered Approach to Corrective Action Objectives (TACO) must be met in determining remediation objectives for all corrective action activities.

B. COMPLETED REMEDIAL ACTIVITIES

Remediation activities for the four HWMUs (Lagoon 1 Lagoon 2, Lagoon 3, the Shawnee Building); four SWMUs (Lagoon 0, Lagoon 1A, Cyanide Treatment Vault and Wetlands Areas) and two Areas of Concern (the Outfall Pipe and Wastewater Release Area) were performed in accordance with the final RCRA closure plan dated December 2, 1999 and subsequent modifications. A CAMU was established at MPC in accordance with the requirements of 35 Illinois Adm. Code Section 724.651. Remediation efforts were

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performed as described in the July 2001 CAMU Landfill Construction Documentation Report and the final August 2001 Closure Documentation Report identified in Condition IV.A.1 above. A summary of the completed activities follows.

1. **Lagoon 0, Lagoon 1, Lagoon 1A, Lagoon 2 , Lagoon 3**

- a. Waste sludges in the lagoons were dried, solidified and/or treated. After removal of waste, at least 1 foot of the base and 1 foot of the interior side slopes were excavated. Additional excavation occurred at the lagoons shown in Figure 2 and as described in the table following this section. The table also summarizes for each lagoon, the type of wastes removed, the remedial removal and excavation activities and the remediation quantities.
- b. Excavated soil and electroplating waste were removed from the lagoons and placed in a CAMU constructed at the former location of Lagoon 2 and Lagoon 3.
- c. The concentrations of contaminants remaining (if any) in the soil left in-place were reported in the Modern Plating CAMU Landfill Construction Document Report dated July 2001, Table 5.1.
- d. After waste was removed, each area was backfilled with clean soils compacted in lifts and the surface graded to drain.
- e. A Groundwater Management Zone (GMZ) was established to address contaminated groundwater at the MPC facility. The requirements for the GMZ are specified in Section III of this permit.

2. **Cyanide Treatment Vault Area**

- a. In the Cyanide Treatment Vault Area, 2 feet of contaminated soil was excavated from the floor and sidewalls of the former vault (approximately 200 cubic yards) and placed in the CAMU.
- b. After excavation activities, soil samples were obtained in the lagoon areas and Cyanide Treatment Vault Area to define the amount of residual contamination.
- c. After waste was removed, this area was backfilled with clean soil, compacted in lifts and the surface graded to drain.
- d. An engineered barrier was placed over these areas.

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3. **Shawnee Building**

Three areas at the Shawnee Building were used for storage of hazardous waste. As part of closure, an estimated 30 cubic yards of contaminated soil were removed and placed in the on-site CAMU. This remedial action achieved the remedial objectives and met the closure requirements of 35 Ill. Adm. Code 725 Subpart G. After waste was removed, this area was backfilled with clean soil compacted in lifts and the surface graded to drain.

4. **Wetland Area**

Approximately 2,905 cubic yards of contaminated soils were removed from four areas in the Wetland Area and placed in the on-site CAMU. Wetland 1 and 1A are off-site in the low area northeast of monitoring well MW-13 and Lagoon 1A. Wetland II and Wetland III are located on-site immediately north of Lagoon 2. Additional excavation occurred in the areas shown in Figure 2 and as described in the table found in Section IV.B of this section. The remedial action achieved the remedial objectives and met the requirements of 35 Ill. Adm. 724.201. The wetland areas were returned to their previous grade by backfilling. No further action is necessary in the Wetland Area.

5. **Outfall Pipe**

An abandoned outfall pipe from the wastewater treatment plant (WWTP) to the Pecatonica River was investigated as a result of a condition in Illinois EPA's December 2, 1999 closure plan approval letter. The investigation lead to the excavation of an area 30 feet long, 10 feet wide and 10 feet deep. Contaminated soil from this area was placed in the CAMU. Remediation efforts were determined to be adequate in Illinois EPA's August 8, 2000 letter with the condition that an institutional control be placed restricting future land use at the facility to commercial/industrial activities.

6. **Wastewater Release**

During construction of the CAMU, a pipeline that transfers wastewater from the manufacturing plant to the WWTP ruptured (IEMA Incident No. 20001377). Approximately 3 cubic yards of soil were contaminated as a result of the spill and contaminated soil was removed and placed in the CAMU. Remediation efforts were determined to be adequate to address this incident.

The following table summarizes the remedial activities completed on the HWMUs and SWMUs of concern at the facility:

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Area	Description of Waste Removed and Additional Remediation and Removal Activity
<u>Lagoon 1</u>	Approximately 3760 cubic yards of electroplating sludge and contaminated soil was removed and placed in the on-site CAMU. Approximately 125 tons of lime kiln dust was added to wet sludge.
<u>Lagoon 2</u>	Approximately 4,750 cubic yards of electroplating sludge and contaminated soil was removed and placed in the CAMU. An additional 1 foot (2 foot total) of soil was removed from the lagoon bottom.
<u>Lagoon 3</u>	Approximately 3760 cubic yards of electroplating sludge and contaminated soil was removed and placed in the CAMU. Approximately 125 tons of lime kiln dust was added to wet sludge.
<u>Lagoon 0</u>	Approximately 2,880 cubic yards of cyanide sludges, zinc, cadmium and copper strippings and sludge possibly containing trichloroethylene wastes were removed and placed in the CAMU. Sludges were treated with oil dry, lime and sand. Approximately an additional 2,000 cubic yards was excavated.
<u>Lagoon 1A</u>	Approximately 1,910 cubic yards of electroplating sludge chemically fixed with Portland cement was removed and placed in the CAMU. An approximately additional 70 cubic yards of contaminated soil was removed.
Shawnee Building	Approximately 30 cubic yards of soil contaminated with metals and trichloroethylene were removed and placed in the CAMU.
Cyanide Vault	Approximately 200 cubic yards of cyanide contaminated soils were removed and placed in the CAMU.
Wetland Soils	Approximately 2905 cubic yards of wetland soils contaminated with metals were removed and placed in the CAMU. Additional excavation occurred in Wetland 1A and Wetland 2.

C. REMEDIAL ACTIVITIES TO BE COMPLETED

1. An Environmental Land Use Control (ELUC) shall be established to restrict use of the facility property to commercial/industrial use activities and restrict exposure to the soils remaining at the Cyanide Treatment Vault and Lagoons, 0, 1, 1A, 2, 3 and the Outfall Pipe SB-OF-05 location. This ELUC must meet the requirements of 35 Ill. Adm. Code 742.1010. Illinois EPA's internet site www.epa.state.il.us contains guidance regarding proposed institutional control, including a model ELUC. A draft ELUC must be submitted to Illinois EPA within sixty days of the modification date of this permit. 35 Ill. Adm. Code 742.1010(d)(8) requires that an ELUC contain scaled maps which show information about the facility, any remaining

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contamination at the facility and any physical features at the facility to which the ELUC applies.

- a. The required scaled site maps must specifically show:
 - (1) The legal boundary of the property to which the ELUC applies;
 - (2) The horizontal and vertical extent of contaminants of concern above applicable remediation objectives for soil and groundwater to which the ELUC applies;
 - (3) Any physical features to which an ELUC applies (e.g., engineered barriers, monitoring wells, caps); and
 - (4) The nature, location of the source, and direction of movement of the contaminants of concern.
 - b. Exhibit B of the model ELUC developed by Illinois EPA is comprised of the maps necessary to meet the requirements of 35 Ill. Adm. Code 742.1010(d)(8). In developing such an exhibit for an ELUC associated with an engineered barrier or industrial/commercial land use restrictions:
 - (1) If only one drawing is used to present all the required information, then it must be clearly labeled as Exhibit B to the ELUC in question. Many times however, it will be necessary to include more than one drawing in Exhibit B to meet the requirements of the requirements of 35 Ill. Adm. Code 742.1010(d)(8). In such cases, each map shall be given a unique Exhibit number (i.e., Exhibit B-1, B-2, B-3, etc.) and labeled as such.
 - (2) A cover sheet must be provided for the exhibit which: (a) lists the types of scaled maps that must be provided in the ELUC as required in 35 Ill. Adm. Code 1010(d)(8); (b) identifies the map within the exhibit which addresses the individual requirements of 35 Ill. Adm. Code 742.1010(d)(8)(A), (B), (C) and (D); and (c) lists the maps which comprise the exhibit by name and number.
 - (3) The Real Estate Tax Index/Parcel Index Number (PIN) of the property in question must be contained on each map in Exhibit B.
2. The ELUC required by Condition IV.C. 1 above must meet the requirements of 35 Ill. Admin, Code 742. The ELUC must contain the following:

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- a. A statement that contaminated soil remains at the following units but that an engineered barrier is present over:
 - (1) the Cyanide Treatment Vault; and
 - (2) Lagoons 0, 1, 1A, 2 and 3.
- b. A requirement that the facility may only be used for commercial/industrial activities in the future;
- c. A statement that contaminated soil remains at the Outfall Pipeline excavation at the SB-0F-05 location but does not pose a threat to human health or the environment provided that future use of the facility is limited to commercial /industrial activities;
- d. A scaled drawing showing the location of the following areas, relative to the property boundaries or the site: (1) the boundaries of the engineered barriers present over the units identified in Item a. above; and (2) the Outfall Pipeline Excavation;
- e. A description of the engineered barrier over each of the units identified in Items a. and d. above;
- f. A requirement that the engineered barriers identified in Items a. and d. above be properly maintained in the future;
- g. A requirement that a site safety plan meeting the requirements of 29 CFR be developed and implemented any construction/excavation work takes place in the soils beneath the engineered barriers identified in Items a. and d above;
- h. A requirement that any soil removed beneath the engineered barriers identified in Items a. and d. above be managed as special waste and tested for the hazardous constituents associated with the areas listed in items a. and d. above.
- i. A requirement that the terms and conditions of the approved Groundwater Management Zone for the facility, its RCRA permit and 35 Ill. Admin. Code 620 and 724 are met in the future.

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D. FUTURE RELEASES FROM SWMUs

1. The Permittee shall notify the Illinois EPA in writing of any newly-identified SWMU(s) discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than sixty (60) calendar days after discovery. This requirement of this section is in accordance with 35 Illinois Admin Code 724.201-Corrective Action for Solid Waste Management Units. Additional corrective action investigation may be required at a later date should new information or additional analysis indicate that there is or may be a release from a SWMU that poses a threat to human health and the environment. The notification shall provide the following information, as available:
 - a. The location of the newly-identified SWMU in relation to other SWMUs on a scaled map or drawing;
 - b. The type and past and present function of the unit;
 - c. The general dimensions, capacities, and structural description of the unit (available drawings and specifications provided);
 - d. The period during which the unit was operated;
 - e. The specifics on all materials, including but not limited to, wastes and hazardous constituents, that have been or are being managed at the SWMU, to the extent available; and
 - f. The results of any relevant available sampling and analysis which may aid in determining whether releases of hazardous wastes or hazardous constituents have occurred or are occurring from the unit.
2. If the submitted information demonstrates a potential for a release of hazardous waste or hazardous waste constituents from the newly identified SWMU, the Illinois EPA may request in writing, that the Permittee prepare a Solid Waste Management Unit (SWMU) Assessment Plan and a proposed schedule of implementation and completion of the Plan for any additional SWMU(s) discovered subsequent to the issuance of this Permit.
3. Within 120 calendar days after receipt of the Illinois EPA request for a SWMU Assessment Plan, the Permittee shall submit a SWMU Assessment Plan to Illinois EPA. The plan shall propose investigations, including field investigations if

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necessary, to determine the release potential to specific environmental media for the newly-identified SWMU. The SWMU Assessment Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify migration of hazardous waste and hazardous constituents from the newly-discovered SWMU(s) to the environment.

4. After the Permittee submits the SWMU Assessment Plan, the Illinois EPA shall approve, approve with conditions, or disapprove the Plan in writing. If the plan is approved, the Permittee shall begin to implement the Plan within forty-five (45) calendar days of receiving such written notification. If the Plan is disapproved, the Illinois EPA shall notify the Permittee in writing of the Plan's deficiencies specify a due date for submittal of a revised plan.
5. The Permittee shall submit a report documenting the results of the approved SWMU Assessment Plan to the Illinois EPA in accordance with the schedule in the approved SWMU Assessment Plan. The SWMU Assessment Report shall describe all results obtained from the implementation of the approved SWMU Assessment Plan. Based upon the results of Illinois EPA's review of this submittal, it may be necessary for the Permittee to conduct further investigation, develop final remediation objectives or carry out a corrective measures program.
6. The Permittee must comply with the requirements of Subsection E below relative to the development of cost estimates and establishment of financial assurance.

E. FINANCIAL ASSURANCE FOR CORRECTIVE ACTION

1. The Permittee must prepare a cost-estimate for the completion of any corrective measure(s) required under Subsection D. above in order to provide financial assurance for completion of corrective action, as required under 35 Ill. Code 724.201(b). Such cost-estimate will be based upon the cost of contamination investigations and assessments for SWMUs, and design, construction, operation, inspection, monitoring, and maintenance of the corrective measure(s) to meet the requirements of 35 Ill. Adm. Code 724.201 and this permit. The cost-estimate must be submitted to the Illinois EPA with each submittal required by D above.
2. Once a cost-estimate has been approved in accordance with Condition E.1 above, the Permittee must demonstrate continuous compliance with 35 Ill. Adm. Code 724.201 by providing documentation of financial assurance using a mechanism specified in 35 Ill. Adm. Code 724.243.

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3. Currently, the facility has completed all required corrective action. Thus, no financial assurance is necessary unless the Permittee must address a release from a newly-identified SWMU in accordance with Subsection D above.

F. INTERIM MEASURES

At any time during the completion of remedial activities for a newly-identified SWMU, the Permittee may initiate additional interim measures for the purpose of preventing continuing releases and/or mitigating the results of releases and/or mitigating the migration of hazardous wastes or hazardous constituents. It shall not be necessary to conduct all phases of an investigation prior to implementing an interim measure if the Illinois EPA and the Permittee agree that a problem can be corrected, or a release cleaned up, without additional study and/or without a formal Corrective Measure Study.

1. Prior to implementing any interim measures beyond those specified above, the Permittee must submit detailed information regarding the proposed interim measure to the Illinois EPA for approval. This information shall include, at a minimum:
 - a. Objectives of the interim measures: how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long-term solution at the facility;
 - b. Design, construction, and maintenance requirements;
 - c. Schedules for design and construction; and
 - d. Schedules for progress reports.
2. If the Illinois EPA determines that a release cannot be addressed without additional study and/or a formal CMS, then the Illinois EPA will notify the Permittee that these must be performed. Any proposal made under this provision or any other activity resulting from such proposal, including the invocation of dispute resolution, shall not affect the schedule for implementation of the remedial action plan or of any other portion of the permit.

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SECTION V

STANDARD CONDITIONS

GENERAL REQUIREMENTS

1. **EFFECT OF PERMIT.** The existence of a RCRA permit shall not constitute a defense to a violation of the Environmental Protection Act or Subtitle G, except for development, modification or operation without a permit. Issuance of this permit does not convey property rights or any exclusive privilege. Issuance of this permit does not authorize any injury to persons or property or invasion of other private rights, or infringement of state or local law or regulations. (35 IAC 702.181)
2. **PERMIT ACTIONS.** This permit may be modified, reissued or revoked for cause as specified in 35 IAC 703.270 through 703.273 and Section 702.186. The filing of a request by the Permittee for a permit modification or revocation, or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. (35 IAC 702.146)
3. **SEVERABILITY.** The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby. (35 IAC 700.107)
4. **PERMIT CONDITION CONFLICT.** In case of conflict between a special permit condition and a standard condition, the special condition will prevail. (35 IAC 702.160)
5. **DUTY TO COMPLY.** The Permittee shall comply with all conditions of this permit except for the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of the Environmental Protection Act and is grounds for enforcement action; permit revocation or modification; or for denial of a permit renewal application. (35 IAC 702.141 and 703.242)
6. **DUTY TO REAPPLY.** If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must apply for a new permit at least 180 days before this permit expires, unless permission for a later date has been granted by the Illinois EPA. (35 IAC 702.142 and 703.125)

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7. **PERMIT EXPIRATION.** This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 35 IAC 703.181-703.209) and through no fault of the Permittee the Illinois EPA has not issued a new permit as set forth in 35 IAC 702.125.
8. **NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE.** It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (35 IAC 702.143)
9. **DUTY TO MITIGATE.** In the event of noncompliance with the permit, the permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. (35 IAC 702.144)
10. **PROPER OPERATION AND MAINTENANCE.** The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory, and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit. (35 IAC 702.145)
11. **DUTY TO PROVIDE INFORMATION.** The Permittee shall furnish to the Illinois EPA, within a reasonable time, any relevant information which the Illinois EPA may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Illinois EPA, upon request, copies of records required to be kept by this permit. (35 IAC 702.148)
12. **INSPECTION AND ENTRY.** The Permittee shall allow an authorized representative of the Illinois EPA, upon the presentation of credentials and other documents as may be required by law, to:
 - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

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- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location. (35 IAC 702.149)

13. MONITORING AND RECORDS. (35 IAC 702.150)

- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste must be the appropriate method from Appendix A of 35 IAC 721. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, latest versions; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, latest versions; or an equivalent method as specified in the approved Waste Analysis Plan.
- b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or application. These periods may be extended by request of the Illinois EPA at any time. The permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well.
- c. Records of monitoring information shall include:
 - i. The date(s), exact place, and time of sampling or measurements;
 - ii. The individual(s) who performed the sampling or measurements;
 - iii. The date(s) analyses were performed;
 - iv. The individual(s) who performed the analyses;
 - v. The analytical technique(s) or method(s) used; and
 - vi. The result(s) of such analyses. (35 IAC 702.150)

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14. **REPORTING PLANNED CHANGES.** The permittee shall give written notice to the Illinois EPA as soon as possible of any planned physical alterations or additions to the permitted facility. In general, proposed changes to the facility will need to be submitted to the Illinois EPA as permit modification request that complies with the requirements of 35 IAC 703.280. (35 Ill. Adm. Codes 702.152(a))
15. **CONSTRUCTION CERTIFICATION.** For a new hazardous waste management facility, the permittee shall not commence treatment, storage or disposal of hazardous waste; and for a facility being modified the permittee shall not treat, store or dispose of hazardous waste in the modified portion of the facility, until:
 - a. The permittee has submitted to the Illinois EPA by certified mail or hand delivery a letter signed by the permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
 - b.
 1. The Illinois EPA has inspected the modified or newly constructed facility and finds it is in compliance with the condition of the permit; or
 2. If, within 15 days of the date of submission of the letter in paragraph (a), the permittee has not received notice from the Illinois EPA of its intent to inspect, prior inspection is waived and the permittee may commence treatment, storage or disposal of hazardous waste. (35 Ill. Adm. Code 703.247)
16. **ANTICIPATED NONCOMPLIANCE.** The Permittee shall give advanced written notice to the Illinois EPA of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements, regulations, or the Act. (35 Ill. Adm. Code 702.152(b))
17. **TRANSFER OF PERMITS.** This permit may not be transferred by the permittee to a new owner or operator unless the permit has been modified or reissued pursuant to 35 IAC 703.260(b) or 703.272. Changes in the ownership or operational control of a facility must be made as a Class 1 modification with the prior written approval of the Illinois EPA. The new owner or operator shall submit a revised permit application no later than 90 days prior to the scheduled change. (35 Ill. Adm. Code 703.260)
18. **MONITORING REPORTS.** Monitoring results shall be reported at the intervals specified in the permit. (35 IAC 702.152(d))
19. **COMPLIANCE SCHEDULES.** Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of

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this permit shall be submitted no later than specified in 35 IAC 702.162. (35 IAC 702.152(e))

20. TWENTY-FOUR HOUR REPORTING.

- a. The Permittee shall report to the Illinois EPA any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the following circumstances. This report shall include the following:
 - i. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
 - ii. Information concerning the release or discharge of any hazardous waste or of a fire or explosion at the HWM facility, which could threaten the environment or human health outside the facility.
- b. The description of the occurrence and its cause shall include:
 - i. Name, address, and telephone number of the owner or operator;
 - ii. Name, address, and telephone number of the facility;
 - iii. Date, time, and type of incident;
 - iv. Name and quantity of material(s) involved;
 - v. The extent of injuries, if any;
 - vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
 - vii. Estimated quantity and disposition of recovered material that resulted from the incident.
- c. A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times and if the noncompliance has not been corrected; the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Illinois EPA may waive the five day

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written notice requirement in favor of a written report within fifteen days. (35 IAC 702.152(f) and 703.245(b))

21. **OTHER NONCOMPLIANCE.** The Permittee shall report all instances of noncompliance not otherwise required to be reported under Standard Conditions 16, 19, and 20, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in Standard Condition 20. (35 IAC 702.152(g))
22. **OTHER INFORMATION.** Where the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Illinois EPA, the Permittee shall promptly submit such facts or information. (35 IAC 702.152(h))
23. **ANNUAL REPORT:** An annual report must be submitted covering facility activities during the previous calendar year. (35 IAC 724.175)
24. **SUBMITTAL OF REPORTS OR OTHER INFORMATION.** All written reports or other written information required to be submitted by the terms of this permit shall be sent to:

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

25. **SIGNATORY REQUIREMENT.** All permit applications, reports or information submitted to the Illinois EPA shall be signed and certified as required by 35 IAC 702.126. (35 IAC 702.151)
26. **CONFIDENTIAL INFORMATION.** Any claim of confidentiality must be asserted in accordance with 35 IAC 702.103 and 35 IAC 161.
27. **DOCUMENTS TO BE MAINTAINED AT FACILITY SITE.** The Permittee shall maintain at the facility, until closure is complete, the following documents and amendments, revisions and modifications to these documents:
 - a. Waste analysis plan as required by 35 IAC 724.113(b) and this permit.
 - b. Personnel training documents and records as required by 35 IAC 724.116(d) and this permit.

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- c. Contingency plan as required by 35 IAC 724.153(a) and this permit.
 - d. Closure plan as required by 35 IAC 724.212(a) and this permit.
 - e. Cost estimate for facility closure as required by 35 IAC 724.242(d) and this permit.
 - f. Operating record as required by 35 IAC 724.173 and this permit.
 - g. Inspection schedules as required by 35 IAC 724.115(b) and this permit.
28. WASTE MINIMIZATION. The Permittee shall certify at least annually that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable, and the proposed method of treatment, storage, or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment, in accordance with 35 IAC 724.173(b)(9).

GENERAL FACILITY STANDARDS

29. GENERAL WASTE ANALYSIS. The Permittee shall comply with the procedures described in the approved waste analysis plan. (35 IAC 724.113)
30. SECURITY. The Permittee shall comply with the security provisions of 35 IAC 724.114(b) and (c).
31. GENERAL INSPECTION REQUIREMENTS. The Permittee shall follow the approved inspection schedule. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 35 IAC 724.115(c). Records of inspections shall be kept as required by 35 IAC 724.115(d).
32. PERSONNEL TRAINING. The Permittee shall conduct personnel training as required by 35 IAC 724.116 and shall maintain training documents and records as required by 35 IAC 724.116(d) and (e).

PREPAREDNESS AND PREVENTION

33. DESIGN AND OPERATION OF FACILITY. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. (35 IAC 724.131)

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34. **REQUIRED EQUIPMENT.** The Permittee shall equip the facility with the equipment set forth in the approved contingency plan, as required by 35 IAC 724.132.
35. **TESTING AND MAINTENANCE OF EQUIPMENT.** The Permittee shall test and maintain the equipment specified in condition 36 as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities are set forth in the approved inspection schedule. (35 IAC 724.133)
36. **ACCESS TO COMMUNICATIONS OR ALARM SYSTEM.** The Permittee shall maintain access to the communications or alarm system as required by 35 IAC 724.134.
37. **ARRANGEMENTS WITH STATE AND LOCAL AUTHORITIES AND EMERGENCY RESPONSE CONTRACTORS.** The Permittee shall attempt to make emergency response arrangements with State and local authorities and agreements with State emergency response teams and emergency response contractors and equipment suppliers as required by 35 IAC 724.137. If State or local officials refuse to enter in preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

CONTINGENCY PLAN

38. **IMPLEMENTATION OF PLAN.** The provisions of the contingency plan must be carried out by the Permittee immediately whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment (35 IAC 724.151(b)). At a minimum, this includes any fire or explosion which occurs in an area where hazardous waste is being managed (treated, stored or disposed) (35 IAC 703.241). Within 15 days of any incident that requires implementation of the contingency plan, the owner or operator must submit a written report to the Illinois EPA as required by 35 IAC 724.156(j).
39. **COPIES OF PLAN.** A copy of the contingency plan, including any revisions, must be maintained at the facility and submitted to all local police and fire departments, hospitals and state and local emergency response teams as required by 35 IAC 724.153.
40. **AMENDMENTS TO PLAN.** The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 35 IAC 724.154.
41. **EMERGENCY COORDINATOR.** A trained emergency coordinator shall be available at all times in case of an emergency as required by 35 IAC 724.155 and 724.156.

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RECORD KEEPING AND REPORTING

42. OPERATING RECORD. The Permittee shall maintain a written operating record at the facility in accordance with 35 IAC 724.173.
43. ANNUAL REPORT. The Permittee shall prepare and submit an annual report to the Illinois EPA prior to March 1st of each year in accordance with the requirements of 35 IAC 724.175.

CLOSURE

44. PERFORMANCE STANDARD. The Permittee shall close the facility as required by 35 IAC 724.211 and in accordance with the approved closure plan.
45. AMENDMENT TO CLOSURE PLAN. The Permittee must amend the closure plan whenever there is a change in the expected year of closure or whenever a change in the facility operation plans or facility design affects the closure plan pursuant to 35 IAC 724.212(c).
46. NOTIFICATION OF CLOSURE. The Permittee shall notify the Illinois EPA at least 60 days prior to the date it expects to begin closure. (35 IAC 724.212(d))
47. TIME ALLOWED FOR CLOSURE. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste and complete closure activities in accordance with the schedule(s) specified in the closure plan. (35 IAC 724.213)
48. DISPOSAL AND/OR DECONTAMINATION OF EQUIPMENT. When closure is completed, the Permittee shall decontaminate and/or dispose of all facility equipment and structures as required by the approved closure (35 IAC 724.214) plan.
49. CERTIFICATION OF CLOSURE. When closure is completed, the Permittee shall submit certification to the Illinois EPA in accordance with 35 IAC 724.215 that the facility has been closed as specified by the approved closure plans.
50. COST ESTIMATE FOR FACILITY CLOSURE. The Permittee's original closure cost estimate, prepared in accordance with 35 Ill. Adm. Code 724.242, must be:
 - a. Adjusted for inflation either 60 days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with Section 724.243. If the owner/operator is using the financial test or corporate guarantee, it must be updated for

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inflation within 30 days after close of the firm's fiscal year, and before the submission of updated information to the Illinois EPA as specified in Section 724.243(f).

- b. Revised no later than 30 days after the Illinois EPA has approved a request to modify the closure plan, if the change in the closure plan increases the cost of closure.
 - c. Kept on record at the facility and updated. (35 Ill. Adm. Code 724.242)
 - d. Made immediately available to Illinois EPA personnel upon Illinois EPA request.
51. **FINANCIAL ASSURANCE FOR FACILITY CLOSURE.** The Permittee shall demonstrate compliance with 35 IAC 724.243 by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the cost estimates required by the previous Permit Condition. Changes in financial assurance mechanisms must be approved by the Illinois EPA pursuant to 35 IAC 724.243.
52. **LIABILITY REQUIREMENTS.** The Permittee shall demonstrate continuous compliance with the requirements of 35 IAC 724.247 and the documentation requirements of 35 IAC 724.251.
53. **INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS.** The Permittee shall comply with 35 IAC 724.248 whenever necessary.

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SECTION VI

REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA permit are summarized below. This summary is provided to highlight the various reporting and notification requirements of this permit.

CONDITION	SUBMITTAL	DUE DATE
CAMU Post-Closure		
II.E.2	Notify appropriate state and local officials	Immediately when Contingency Plan is implemented.
II.E.3	Notify appropriate IEMA and IEPA	Within 24 hours of implementing the Contingency Plan.
II.F.3	Certify to the Illinois EPA that post-closure care was performed in accordance with the specifications.	Within 60 days after completion of the post-closure care period.
II.F.5	Notify the people on the facility mailing list of changes to the permit.	Within 90 days of the effective date of the permit.
	Submit documentation to IEPA that the notification required above was performed.	Within 120 days of the effective date of the permit.
II.G.3	Submit an annual permit modification to update the post-closure cost estimate and financial assurance.	October 1
II.G.4	Submit an annual permit modification to revise the amount of financial assurance required. (optional)	October 1
II.H.2	Submit revised 39i certification forms.	Within 30 days of any of the events cited in Condition II.H.2.
Groundwater Monitoring		
III.D.3	Notify IEPA if any of the wells identified in Condition III.D.1 are damaged or the	Within thirty (30) days of the date the damage is

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CONDITION	SUBMITTAL	DUE DATE
	structural integrity has been compromised.	detected.
III.D.5	Provide Illinois EPA boring logs, construction diagrams and data sheets from new or replacement wells.	Within 30 days of the date installation is complete.
III.I.2	Reporting of groundwater monitoring data and statistical calculations are required semi-annually.	April 15 and October 15
III.I.3	Semi-annual groundwater surface elevation data.	April 15 and October 15
III.I.4	Groundwater flow rate and direction in the uppermost aquifer.	October 15
III.I.5	Surveyed elevation of the top of the well casing ("stick-up")	October 15 every 5 years beginning in 2006
III.I.6	Elevation of the bottom of each monitoring well.	October 15
III.J.1	Apply for permit modification to modify the corrective action monitoring program.	Within 90 days of determining the program no longer meets the requirements of 35 IAC 724.200.
Corrective Action		
IV.C.1	Provide a draft ELUC for the facility.	Within 60 days of the modification date of this permit.
IV.D.1	Notify Illinois EPA in writing of any newly-identified SWMU(s) or release from an existing SWMU.	No later than sixty (60) calendar days after discovery.
IV.D.3	Submit a SWMU Assessment Plan to Illinois EPA.	Within 120 calendar days after receipt of the Illinois EPA request.
IV.D.5	Submit a report documenting the results of the approved SWMU Assessment Plan to the Illinois EPA	In accordance with the schedule in the approved SWMU Assessment Plan.
IV.F.1	Submit detailed information regarding the proposed interim measure to the Illinois	Prior to implementing any interim measures

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CONDITION	SUBMITTAL	DUE DATE
	EPA for approval.	beyond those specified in this permit.
Standard Conditions		
6	Complete application for new permit.	At least 180 days prior to permit expiration.
11	Information requested by Illinois EPA and copies of records required to be kept by this permit.	Reasonable time.
14	Notify Illinois EPA of planned physical alterations or additions.	As soon as possible.
15	Construction Certification	Upon construction of a new or modified unit.
16	Notify Illinois EPA of changes that may result in permit noncompliance.	Prior to the planned change.
17	Application for permit modification indicating permit is to be transferred.	90 days prior to the planned change of ownership.
18	Monitoring reports	The intervals specified in the permit.
19	Submission of any information required in a compliance schedule.	Within 14 days after each schedule date.
20	Report to Illinois EPA any non-compliance that may endanger health or environment. By telephone In writing	Within 24 hours after discovery. Within 5 days after discovery.
21	Report all other instances of noncompliance.	At the time monitoring reports, as required by this permit, are submitted
23	Annual Report	March 1 of each year.
38	Report to Illinois EPA details regarding incident that required implementation of	Within 15 days after event.

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CONDITION	SUBMITTAL	DUE DATE
	contingency plan.	
43	Submit annual report required by 35 IAC 724.175.	March 1 of each year.
46	Notify Illinois EPA that expecting to close.	At least 60 days prior to beginning closure.
50(a)	Adjust closure cost estimate for inflation.	Within 30 days after anniversary date.
50(b)	Revision of closure cost estimate.	As needed.

FIGURES

Figure 1: Map of Facility

Figure 2: Map of Remediation Areas

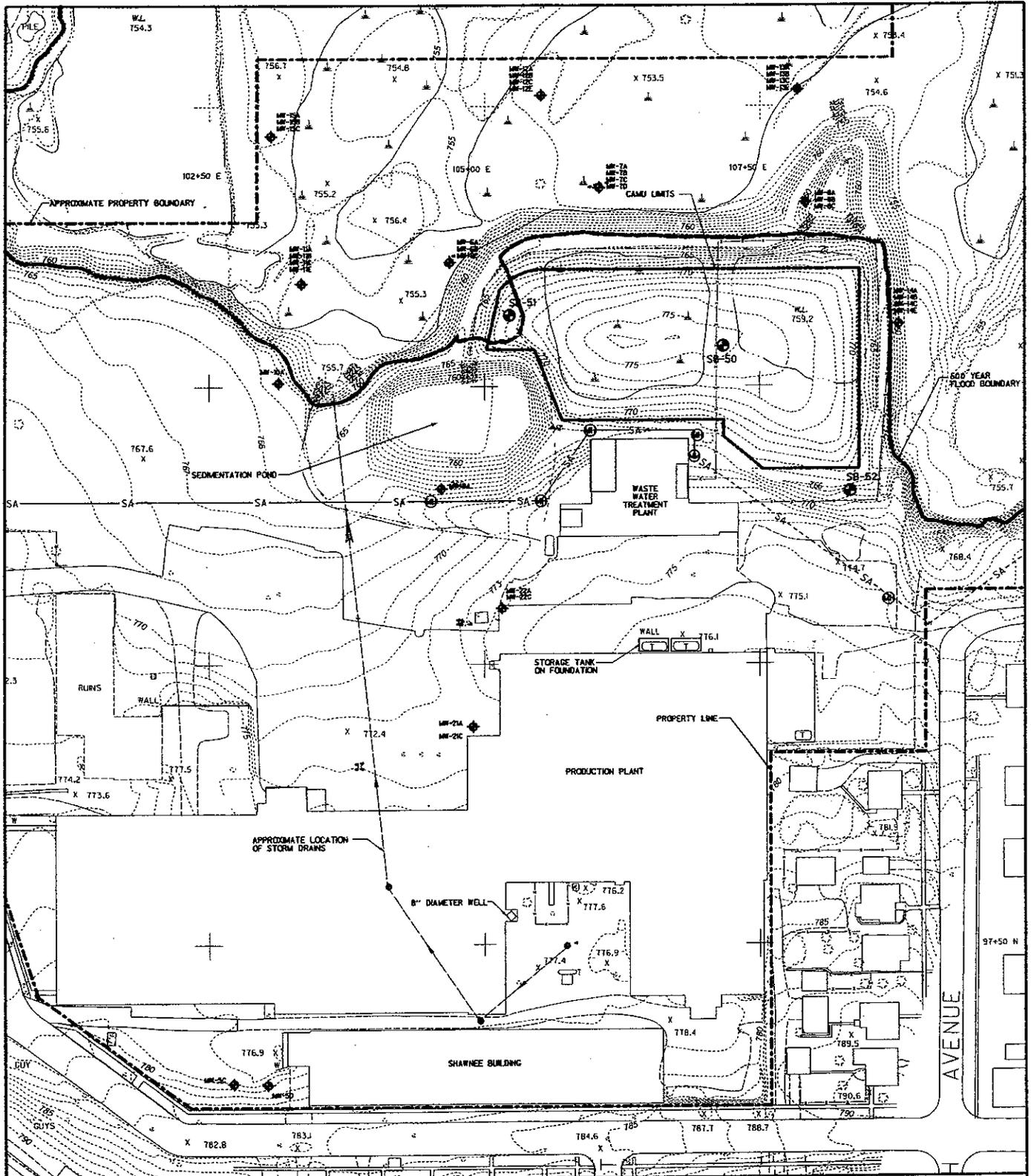
MODERN PLATING CORP

RCRA Post-Closure Permit

IEPA No. ID #1770200010

USEPA ID No. 005172325

Log No. B-167



NOTES:

1. SITE LOCATION: SE 1/4 OF SECTION 32, T27N, R0E, STEPHENSON COUNTY, ILLINOIS
2. TOPOGRAPHICAL BASE MAP PREPARED BY AERO-METRIC ENGINEERING, SHEBOYGAN, WISCONSIN. DATE OF PHOTOGRAPHY: NOVEMBER 20, 1986.
3. ELEVATIONS BASED ON MEAN SEA LEVEL DATUM. CONTOUR INTERVAL IS ONE FOOT. BENCH MARK IS LOCATED ON THE N.W. CORNER OF THE PUMP STATION CONCRETE SLAB, COORDINATES N 10046.1 E 10491.0, AT ELEVATION 773.82 FEET.
4. 500 YEAR FLOOD BOUNDARY TAKEN FROM "NOVEMBER 1976 FLOOD INSURANCE STUDY" BY U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT, FEDERAL INSURANCE ADMINISTRATION.



MODERN PLATING CORPORATION

**FIGURE 1
EXISTING CAMU**

Scale: 0 60' 120'

Date: AUGUST, 2004

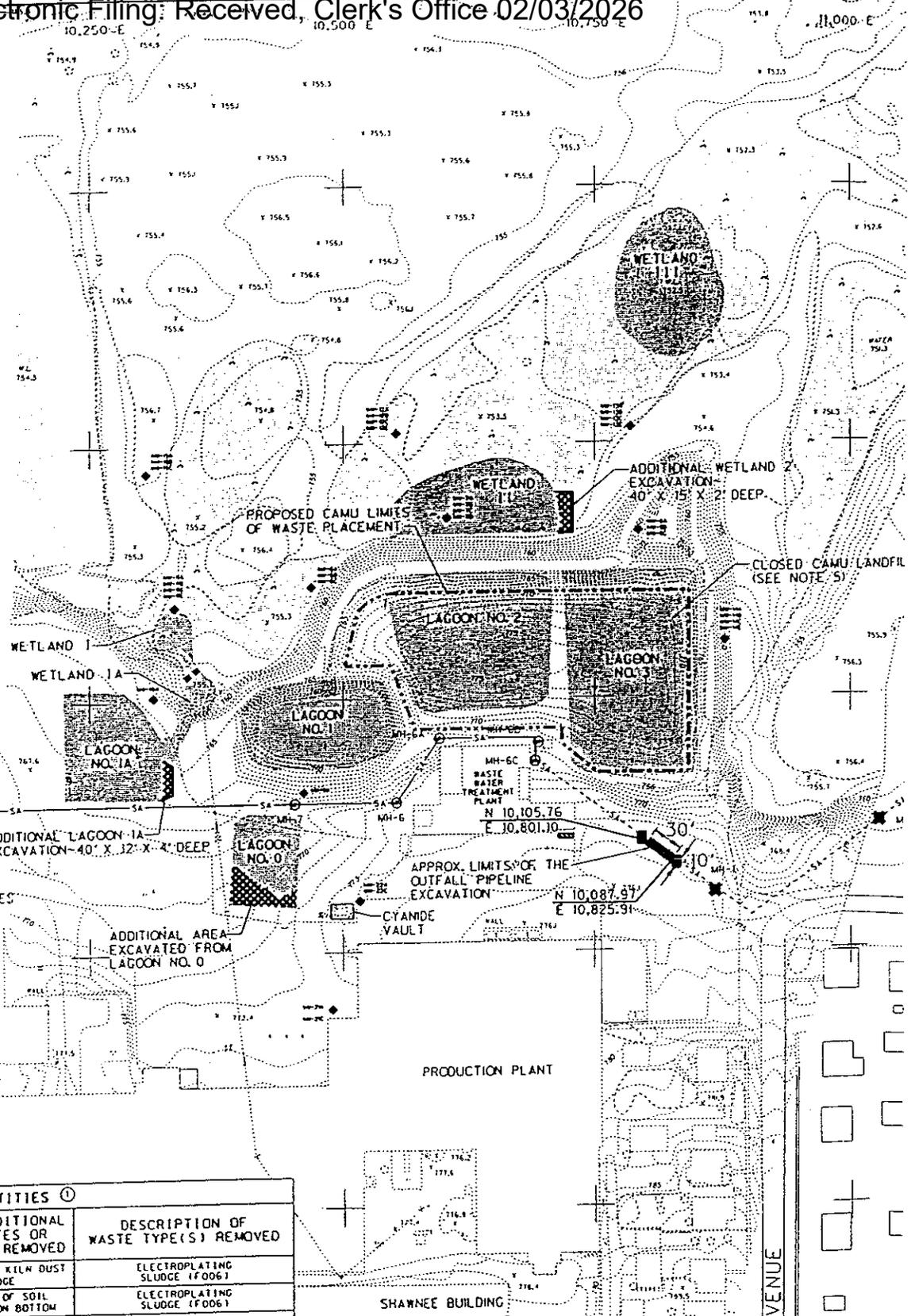
Prepared By: Foth & Van Dyke

By: DAT

97M015

LEGEND

- EXISTING BUILDING
- EXISTING GROUND CONTOUR
- EXISTING SPOT ELEVATION
- DEPRESSION
- TREES AND / OR BRUSH
- EXISTING ROADWAY
- EXISTING TRAIL
- MARSH/SWAMP SYMBOL
- WATER BOUNDARY
- EXISTING FENCE
- ACTIVE DISCHARGE SANITARY SEWER PIPELINE
- ABANDONED OUTFALL PIPELINE
- AREA EXCAVATED 10' (WIDTH AT EXCAVATION BASE) X 30' (LENGTH) X 7' (DEPTH)
- PIPELINE PLUG NOT IN A MANHOLE
- SPOT LOCATIONS (X, Y)
- AREA EXCAVATED TO REMOVE CHROMATE RINSE WATER CONTAMINATED SOILS
- PIPELINE PLUGGED AND MANHOLE FILLED WITH SOIL
- MONITORING WELL NUMBER AND LOCATION
- CONTROL MONUMENT NUMBER AND LOCATION
- APPROXIMATE BOUNDARY OF EXISTING SLUDGE STORAGE AREA
- PROPOSED CAMU LIMITS OF WASTE PLACEMENT
- EXISTING WETLAND AREA
- STORM DRAIN
- AREAS REMEDIATED (REFER TO SCHEDULE ON THIS DRAWING FOR ESTIMATED QUANTITIES)



REMEDICATION QUANTITIES ①

REA	ESTIMATED QUANTITY	DESCRIPTION OF ADDITIONAL REMEDIATION WASTES OR CONTAMINATED SOIL REMOVED	DESCRIPTION OF WASTE TYPE(S) REMOVED
COON 1	3,760 CU. YDS	APPROX. 125 TONS OF LIME KILN DUST ADDED TO WET SLUDGE	ELECTROPLATING SLUDGE (F006)
COON 2	4,750 CU. YDS	AN ADDITIONAL 1 FOOT OF SOIL REMOVED FROM THE LAGOON BOTTOM	ELECTROPLATING SLUDGE (F006)
COON 3	4,750 CU. YDS	APPROX. 125 TONS OF FINE KILN DUST ADDED TO WET SLUDGES	ELECTROPLATING SLUDGE (F006 & F007)
COON 0	2,880 CU. YDS	APPROX. ADDITIONAL 2,000 CU. YDS. EXCAVATED FROM LAGOON NO. 0	CYANIDE SLUDGES, ZINC, CADMIUM AND COPPER STRIPPINGS, MAY CONTAIN ICE. SLUDGES TREATED WITH OIL DRY, LIME AND SAND (F006 & F007)
COON 1A	1,910 CU. YDS	APPROX. ADDITIONAL 70 CU. YDS. REMOVED	ELECTROPLATING SLUDGE CHEMICALLY FIXED WITH PORTLAND CEMENT
AWANEE BLDG	30 CU. YDS	N/A	SOILS CONTAMINATED WITH METALS AND ICE
CYANIDE VAULT	200 CU. YDS	N/A	CONCRETE VAULT AND CYANIDE CONTAMINATED SOILS
WETLAND SOILS	2,225 CU. YDS	APPROX. ADDITIONAL 95 CU. YDS. EXCAVATED FROM WETLAND 1A AND 45 CU. YDS. FROM WETLAND 2	ORGANIC SILTY CLAYS CONTAMINATED WITH METALS

MODERN PLATING CORPORATION

FIGURE 2
EXTENT OF AREAS REMEDIATED

Scale: Date: JULY, 2001

Prepared By: Foth & Van Dyke | By: JOW | 97M01

① REMEDIATION QUANTITIES ARE IN-PLACE CU. YDS. BASED ON ESTIMATES PREPARED FROM FIELD NOTES.

ATTACHMENT A

POST – CLOSURE COST ESTIMATE

MODERN PLATING CORP

RCRA Post-Closure Permit

IEPA No. ID #1770200010

USEPA ID No. 005172325

Log No. B-167

Post-Closure Care Cost Estimate
for
MODERN PLATING CORP

RCRA Post-Closure Permit
IEPA No. ID #1770200010
USEPA ID No. 005172325
Log No. B-167

Item / Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1. Site Inspections and Report (annual) (1 per year)	1 per yr	\$1,000 each	\$1,000
2. Land Surface Care			
◆ Erosion Damage Repair (0.9 cy/acres/yr on 2 acres)	1.8 cy	\$50/cy	\$90
◆ Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr)	0.2 acres	\$2,500/acre	\$500
◆ Snow Plowing (Assume 2 snowfall events)	2 each	\$200/each	\$400
3. Leachate Treatment ¹			
	7,680 ³ gal/yr	\$0.02/gal	\$154
4. Leachate Hauling ²			
	7,680 gal/yr	\$0.20/gal	\$1,536

	Item / Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
5.	Environmental Monitoring (semi-annually)			
	◆ Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year)	2 sample events per yr	\$4,760/event	\$9,520
	◆ Leak Detection System (LDS) Monitoring (1 location, 12 times/year)	12 events	\$100/event	\$1,200
	◆ Leachate Monitoring (1 location, 2 times/year)	2 samples	\$140/sample	\$280
	◆ Surface water Monitoring (2 locations, 2 times/year)	4 samples	\$40/sample	\$160
6.	Mowing (2 acres per year)	2 acres	\$50/acre	\$100
7.	Landfill Sump Pump (Replace each pump every 5 yrs)	12 pumps	\$1,400/pump	\$560 ⁴
			Subtotal	\$15,500
			Contingency (10%)	\$1,550
			Total Cost per Year	\$17,050

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site.

³ Leachate volume is the average of the total amount of leachate generated in the last 3 years (2005-2007)

⁴ Prorated to an annual cost over the 30-year long-term care period.

ATTACHMENT B

**POST-CLOSURE
INSPECTION & MAINTENANCE SCHEDULE**

MODERN PLATING CORP

RCRA Post – Closure Permit

IEPA No. ID #1770200010

USEPA ID No. 005172325

Log No. B-167

Post-Closure Inspection Schedule and Log

**Modern Plating Corporation
CAMU**

Equipment or Area	Description	Activity Description	Frequency	Date	Time	Comments
Leachate Collection System (LCS)	Side slope Riser (SSR) Pump and Piping	<ol style="list-style-type: none"> 1. Check for leaks. 2. Check for leaks weekly thereafter. 3. Service pumps. 4. Check pressure transducer for proper operation. 5. Check flow meter and pump controls for proper operation. 6. Clean paddlewheel on liquid flow sensors 7. Check alarms and alarm lights for proper operation (press down lights on control panel). 	<p>Annually 5 days after start-up, repair leaks within 15 days. As per manufacturer's O&M manual. As per manufacturer's O&M manual.</p> <p>As per manufacturer's O&M manual.</p> <p>As needed for trouble free operation</p> <p>Weekly during active life, monthly after closure.</p>			
Leachate Detection System (LDS)		<ol style="list-style-type: none"> 1. Check liquid levels and remove liquids above pumping level. Record liquid level and leachate quantity in sump.¹ 2. Check liquid levels and remove liquids above pumping level 3. Check pressure transducers for proper operation. 4. Check alarms and alarm lights for proper operation. 	<p>Weekly during active site life; monthly after closure.</p> <p>Monthly record gallons pumped from LCS and LDS for each phase. Refer to 35 IAC 724.403 for frequencies if leakage does not occur. As per manufacturer's O&M manual.</p> <p>Weekly during active site life, monthly after closure.</p>			
Exterior of CAMU Landfill	Berms	<ol style="list-style-type: none"> 1. Check for wet spots and leaks. 2. Check for settlement, slumping or sloughing. 3. Check for erosion and bare sod areas. 	<p>Semiannually</p> <p>Semiannually</p> <p>Semiannually and after each major rainfall event (i.e., greater than 1/2 inch).</p>			<p>Walk final cover semi-annually.</p> <p>Check site rain gauge.</p>

Post-Closure Inspection Schedule & Log
 Modern Plating Co. CAMU

Equipment or Area	Description	Activity Description	Frequency	Date	Time	Comments
Run-on and Run-Off Control	Erosion Control Devices	1. Riprap-inspection for washout or undercutting.	Quarterly and after each major rainfall event.			Walk ditches and sedimentation basin after rainfall greater than 1/2 inch.
		2. Ditches-inspect for siltation and/or erosion.	Quarterly and after each major rainfall event.			
		3. Erosion bales or silt fencing-inspect for washout or undercutting.	Quarterly and after each major rainfall event.			
		4. Culverts-inspect for washout/siltation at inlet and outlet.	Quarterly and after each major rainfall event.			
	Sedimentation Basins	1. Inspect berms for erosion, scouring and slumping.	Quarterly and after each major rainfall event.			Inspect after rainfall event greater than 1/2 inch.
		2. Inspect pond bottom for build-up of sediment.	Quarterly and after each major rainfall event.			
		3. Inspect inlet and outlet for erosion and sedimentation.	Quarterly and after each major rainfall event.			
		4. Inspect trash rack and rock filter.	Quarterly and after each major rainfall event.			
Final Cover Surface	Vegetation	1. Inspection for growth and overall health.	Quarterly and after each major rainfall event.			Inspect after rainfall event greater than 1/2 inch.
		2. Evidence of stress.	Quarterly and after each major rainfall event.			
		3. Bare spots from erosion, washout or die-offs, etc.	Quarterly and after each major rainfall event.			
	Final Cover	1. Erosion resulting in rills, gullies or bare soil.	Quarterly and after each major rainfall event.			Inspect after rainfall event greater than 1/2 inch.
		2. Settlement resulting in loss of grade and/or water standing on the final cover.	Quarterly and after each major rainfall event.			
		3. Slumping or sloughing of final cover.	Quarterly and after each major rainfall event.			
Security Control Devices	Fences, Gates and Locks	1. Inspection for proper function.	Semiannually			
		2. Replace and repair as required.	Semiannually			
Gas Venting System	Risers	1. Inspect for plugging.	Semiannually			

Post-Closure Inspection Schedule & Log
Modern Plating Co. CAMU

Groundwater Monitoring Wells	Protective Tops Well	1. Inspect protective tops and seal for integrity and function. 2. Record well condition, including well depth, siltation, water depth, well pipe condition and water quality.	Semiannually Semiannually		Record results of annual well inspection.
Horizontal and Vertical Control	Benchmarks	1. Check for disturbance and remark (i.e., flag and/or paint).	Annually		
Groundwater Monitoring Wells	Survey	1. Survey stick-up once every five (5) years. 2. Report elevation of the bottom of each monitoring well (Storet 72020).	Every five (5) years. Annually		Report during second quarter sampling event.

¹ To be compared with the action leakage rate of 2,434 gal/day per phase.

Post-Closure Maintenance Plan

**Modern Plating Corporation
CAMU**

Equipment or Area	Description	Preventive Maintenance	Corrective Maintenance Procedures	Equipment Requirements	Material Needs
Leachate Collection System (LCS)	Side Slope Riser (SSR) Pump and Piping	<ol style="list-style-type: none"> 1. Service pumps in accordance with the manufacturer's requirements. 2. Clean pump according to the manufacturer's recommendations. 3. Clean interior piping annually. 4. Inspect liquid level sensor as per manufacturer's O&M manual. 	<ol style="list-style-type: none"> 1. Refer to O&M manual. 2. Repair leaks immediately after they are observed. 	<ol style="list-style-type: none"> 1. Refer to O&M Manual. 2. Refer to O&M Manual. 	Refer to O&M Manuals.
Leachate Detection System (LDS)		<ol style="list-style-type: none"> 1. Service pumps in accordance with the manufacturer's requirements. 2. Clean pump according to the manufacturer's recommendations. 3. Clean interior piping annually. 4. Inspect liquid level sensor as per manufacturer's O&M manual. 	<ol style="list-style-type: none"> 1. Refer to O&M manual. 2. Repair leaks immediately after they are observed. 	<ol style="list-style-type: none"> 1. Refer to O&M Manual. 2. Refer to O&M Manual. 	Refer to O&M Manuals.
Final Cover	Surface Water Management System	<ol style="list-style-type: none"> 1. Clean culverts of debris. 	<ol style="list-style-type: none"> 1. Correct erosion problems by installing erosion control devices. 	Truck, bobcat, shovel.	Erosion mat, riprap, topsoil, etc.
	Cover Settlement		<ol style="list-style-type: none"> 1. Fill settled areas and grade to drain. 2. Revegetate filled areas. 	Truck, small bulldozer, seeder.	Fill soil, topsoil, seed, fertilizer and mulch.
	Vegetation Final Surface	<ol style="list-style-type: none"> 1. Mow grass semiannually. 2. Revegetate bare spots and eroded areas. 	<ol style="list-style-type: none"> 1. Repair eroded areas by filling with soil to grading and adding erosion mat prior to seeding. 2. Seed, fertilize and mulch. 	Truck small bulldozer, seeder and mower.	Fill soil, topsoil, seed, fertilizer, mulch and erosion matting.

Post-Closure Maintenance Plan

**Modern Plating Corporation
CAMU**

Equipment or Area	Description	Preventive Maintenance	Corrective Maintenance Procedures	Equipment Requirements	Material Needs
Berms	Exterior Berms	<ol style="list-style-type: none"> Mow grass semiannually. Revegetate bare spots and eroded areas. 	<ol style="list-style-type: none"> Repair eroded areas by filling with soil to grading and adding erosion mat prior to seeding. Seed, fertilize and mulch. 	Truck, small bulldozer, seeder	Fill soil, topsoil, seed, fertilizer, mulch and erosion matting.
Environmental Monitoring Devices	Groundwater Monitoring Wells	<ol style="list-style-type: none"> Mark wells with flag to prevent damage during other maintenance. 	<ol style="list-style-type: none"> Repair/replace broken protector pipes, surface seals and locks. 	Shovel	Protector pipes, bentonite lock/key set, PVC pipe
Security Devices	Means to Control Entry Exterior Lighting	<ol style="list-style-type: none"> Repaint rusted or scratched areas. Replace burnt out bulbs. 	<ol style="list-style-type: none"> Repair or replace worn or rusty fences. 	Hand tools	Fence/gate parts and locks
Surface Water Management and Erosion Control Structure	Sedimentation Pond	<ol style="list-style-type: none"> Clean sediment from ponds. Remove debris from pipes and trash rack. 	<ol style="list-style-type: none"> Repair eroded inlet/outlet, dikes, etc. Repair eroded or silted in areas. Clean trash rack, inlet and outlet pipes. 	Backhoe, truck, shovel	Fill soil, erosion control materials (e.g., riprap), pipes
Access Roads	Ditches, Culverts, Spillways, etc.	<ol style="list-style-type: none"> Clean sediment from ditches. 	<ol style="list-style-type: none"> Replace rusted culverts. Repair eroded areas and install erosion control measures. 	Backhoe, truck, shovels	Fill soil erosion control materials (e.g., riprap), pipes
Final Cover	Gas Vents	<ol style="list-style-type: none"> Remove mud tracking. Clean vents. 	<ol style="list-style-type: none"> Repair ruts, pot holes, etc. Repair, replace damaged vents and surface seals. 	Truck, shovels Shovel	Road gravel Piping, glue, etc.

ATTACHMENT C

**GROUNDWATER MONITORING PROGRAM
ATTACHMENTS**

MODERN PLATING CORP

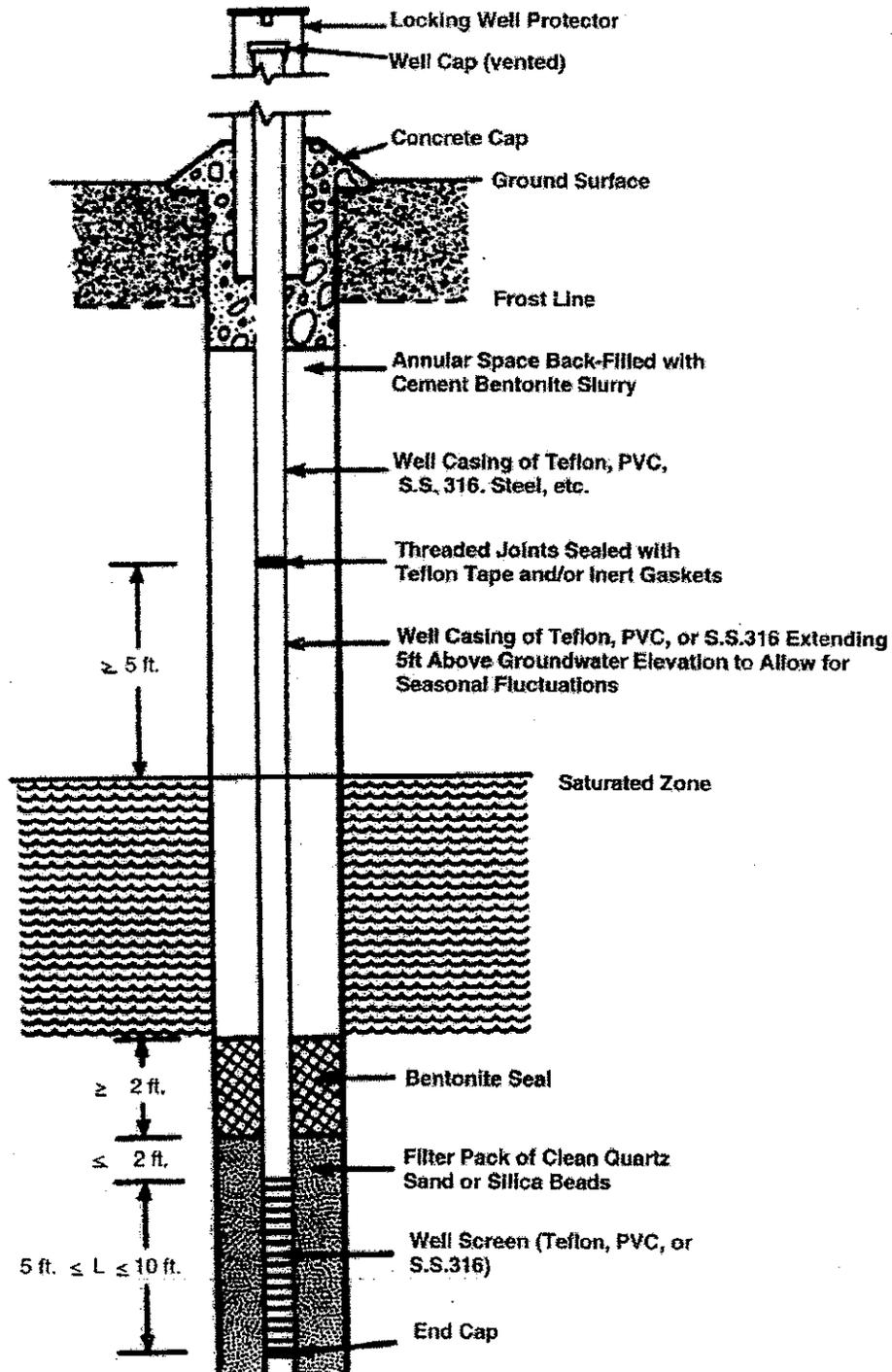
RCRA Post – Closure Permit

IEPA No. ID #1770200010

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Log No. B-167

Monitoring Well Diagram



Illinois Environmental Protection Agency

Well Completion Report

Site Number: _____ County: _____

Site Name: _____
 State _____
 Plane Coordinate: X _____ Y _____ (or) Latitude: _____ Longitude: _____

Well #: _____

Borehole #: _____

Surveyed by: _____

IL Registration #: _____

Drilling Contractor: _____

Driller: _____

Consulting Firm: _____

Geologist: _____

Drilling Method: _____

Drilling Fluid (Type): _____

Logged By: _____

Date Started: _____ Date Finished: _____

Report Form Completed By: _____

Date: _____

ANNULAR SPACE DETAILS

Elevations (MSL)* Depths (BGS) (.01ft.)

Type of Surface Seal: _____

Type of Annular Sealant: _____

Installation Method: _____

Setting Time: _____

Type of Bentonite Seal - - Granular, Pellet, Slurry
 (Choose One)

Installation Method: _____

Setting Time: _____

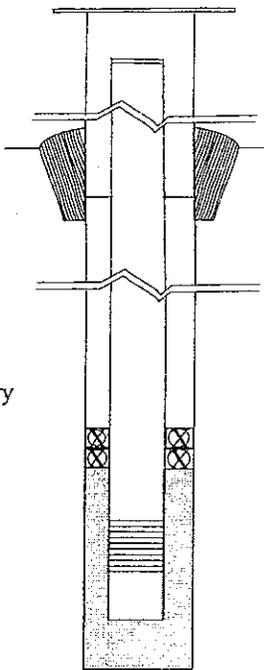
Type of Sand Pack: _____

Grain Size: _____ (Sieve Size)

Installation Method: _____

Type of Backfill Material: _____
 (if applicable)

Installation Method: _____



_____	_____	Top of Protective Casing
_____	_____	Top of Riser Pipe
_____	_____	Ground Surface
_____	_____	Top of Annular Sealant
_____	_____	Static Water Level (After Completion)
_____	_____	Top of Seal
_____	_____	Top of Sand Pack
_____	_____	Top of Screen
_____	_____	Bottom of Screen
_____	_____	Bottom of Well
_____	_____	Bottom of Borehole

* Referenced to a National Geodetic Datum

CASING MEASUREMENTS

Diameter of Borehole (inches)	_____
ID of Riser Pipe (inches)	_____
Protective Casing Length (feet)	_____
Riser Pipe Length (feet)	_____
Bottom of Screen to End Cap (feet)	_____
Screen Length (1" slot to last slot) (feet)	_____
Total Length of Casing (feet)	_____
Screen Slot Size **	_____

**Hand-Slotted Well Screens are Unacceptable

WELL CONSTRUCTION MATERIAL

(Choose one type of material for each area)

Protective Casing	SS304, SS316, PTFE, PVC, or Other
Riser Pipe Above W.T.	SS304, SS316, PTFE, PVC, or Other
Riser Pipe Below W.T.	SS304, SS316, PTFE, PVC, or Other
Screen	SS304, SS316, PTFE, PVC, or Other

ILLINOIS EPA MONITOR WELL PLUGGING AND ABANDONMENT PROCEDURES

		Well Construction	Plugging Procedure
I. Unconsolidated Sediment Wells	I-A	...if backfilled with cement grout above bentonite seal and/or sandpack:	<ol style="list-style-type: none"> 1. Cut casing off at desired depth. 2. Mix neat cement slurry (5 gal. water per 94 lb. bag cement). 3. Insert tremi pipe (1" i.d. pvc) into well and extend to bottom. 4. Slowly pump slurry under low pressure through tremi pipe. 5. Slowly withdraw tremi pipe - making sure bottom of pipe remains below pure slurry. 6. Continue slow pumping until all formation water and the watery slurry mix is displaced from top of casing.
	I-B	...if backfilled with soft sediments (cuttings) above bentonite seal and/or sandpack:	<ol style="list-style-type: none"> 1. Knock out and remove thin surface concrete plug, if present. 2. Re-auger entire length of well. 3. Remove well casing from re-augured borehole. 4. Mix neat cement slurry (5 gal. water per 94 lb. bag cement). 5. Insert tremi pipe (1" i.d. pvc) into augers and extend to bottom. 6. Slowly pump slurry under low pressure through tremi pipe. 7. Continue slow pumping until all formation water and the water slurry mix is displaced from top of casing. 8. Slowly withdraw tremi pipe - making sure bottom of pipe remains below pure slurry. 9. Pull a flight of augers (5" if in unstable materials and hole collapse is likely or 10" if in competent material and collapse is unlikely). 10. Top off cement slurry after each flight is removed.
	I-C	...if monitor well construction is unknown:	<ol style="list-style-type: none"> 1. Follow procedures in I-A.
II. Bedrock Wells	II-A	...All bedrock monitor wells:	<ol style="list-style-type: none"> 1. Cut casing off at desired depth. 2. Mix neat cement slurry (5 gal. water per 94 lb. bag cement). 3. Insert tremi pipe (1" i.d. pvc) into well and extend to bottom. 4. Slowly pump slurry under low pressure through tremi pipe. 5. Slowly withdraw pipe making sure bottom of pipe remains below pure slurry. 6. Continue slow pumping until all formation water and the watery slurry mix is displaced from top of casing.



Illinois
Environmental
Protection Agency

Bureau of Land
1021 North Grand Avenue East
Box 19276
Springfield, IL 62794-9276

RCRA FACILITY GROUNDWATER, LEACHATE AND GAS REPORTING FORM

This form must be used as a cover sheet for the notices and reports, identified below as required by: (1) a facility's RCRA interim status closure plan; (2) the RCRA interim status regulations; or (3) a facility's RCRA permit. All reports must be submitted to the Illinois EPA's Bureau of Land Permit Section. This form is for use by Hazardous Waste facilities only. Reporting for Solid Waste facilities should be submitted on a separate form. All reports submitted to the Illinois EPA's Bureau of Land Permit Section must contain an original, plus a minimum of two copies.

Note: This form is not to be used with permit or closure plan modification requests. The facility's approved permit or closure plan will state whether the document you are submitting is required as a report or a modification request.

Facility Name: _____ Site ID #: _____
Facility Address: _____ Fed ID #: _____

Check the appropriate heading. Only one heading may be checked for each corresponding submittal. Check the appropriate sub-heading, where applicable. Attach the original and all copies behind this form.

<input type="checkbox"/> LPC-160 Forms	
<input type="checkbox"/> <u>Groundwater</u>	<input type="checkbox"/> <u>Leachate</u>
<input type="checkbox"/> Quarterly – Indicate one: 1 2 3 4	<input type="checkbox"/> Quarterly – Indicate one: 1 2 3 4
<input type="checkbox"/> Semi-Annual	<input type="checkbox"/> Semi-Annual
<input type="checkbox"/> Annual	<input type="checkbox"/> Annual
<input type="checkbox"/> Biennial	<input type="checkbox"/> Biennial

Groundwater Data (without LPC-160 Forms)

<input type="checkbox"/> Quarterly – Indicate one: 1 2 3 4	
<input type="checkbox"/> Annual	<input type="checkbox"/> Semi-Annual
	<input type="checkbox"/> Biennial

Well Construction Information

<input type="checkbox"/> Well Construction Forms, Boring Logs and/or Abandonment Forms
<input type="checkbox"/> Well Survey Data (e.g., Stick-up Elevation Data)

Notice of Statistically Significant Evidence of Groundwater Contamination (35 Ill. Adm. Code 724.198)

Notice of Exceedence of Groundwater Concentration Limit (35 Ill. Adm. Code 724.199(h))

Notice of Alternate Source or Error in Sampling Analysis or Evaluation of Groundwater (35 Ill. Adm. Code 724.199(i))

Gas Monitoring Reports

Other (identify) _____

**Formatting Requirements for the 01 Record of the Electronically Submitted
Groundwater and Leachate Data (the 01 Record portion of the LPC-160 is included
for example purposes)**

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM**

Page 1 of _____

RECORD CODE							TRANS CODE
L	P	C	S	M	0	1	A
1				7			8
REPORT DUE DATE _____ / _____ / _____ <small>36 M D Y 41</small>							

FEDERAL ID NUMBER _____

SITE INVENTORY NUMBER _____ <small>9 18</small>	MONITOR POINT NUMBER _____ <small>(see Instructions) 19 22</small>
REGION _____ CO. _____	DATE COLLECTED _____ / _____ / _____ <small>23 M D Y 28</small>
FACILITY NAME _____	

FOR IEPA USE ONLY
LAB _____ <small>29</small>
DATE RECEIVED _____ / _____ / _____ <small>42 M D Y 47</small>

BACKGROUND SAMPLE (X) _____ TIME COLLECTED _____ : _____
54 (24 Hr. Clock) 55 11 M 58

UNABLE TO COLLECT SAMPLE _____
(see Instructions) 59

MONITOR POINT SAMPLED BY _____ OTHER (SPECIFY) _____
(see Instructions) 60

SAMPLE FIELD FILTERED — INORGANICS (X) _____ ORGANICS (X) _____
61 62

SAMPLE APPEARANCE _____
63

COLLECTOR COMMENTS _____
103

LAB COMMENTS _____
150

IL 532 1213
LPC 160 01/90

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 ½, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to \$25,000 for each day the failure continues a fine up to \$1,000.00 and imprisonment up to one year. This form has been approved by the Forms Management Center.

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

*Only Keypunch with Data in Column 35 or Columns 38-47

KEY:

<u>Spaces Numbered</u>	<u>Description</u>	<u>Format</u>
Spaces 1-7	Record Code	LPCSM01
Space 8	Trans Code	A
Spaces 9-18	Site ID	0000000000
Spaces 19-22	Mon Pt.ID	G000
Spaces 23-28	Date Collected	000000
Space 29	Lab	
Spaces 30-35	Filler	
Spaces 36-41	Report Due Date	000000
Spaces 42-47	Date Received	000000
Spaces 48-53	Filler 2	
Space 54	Background Sample	
Spaces 55-58	Time Collected	0000
Space 59	Unable to Collect Sample	
Space 60	Monitoring Point Sampled By	
Space 61	Field Filtered – Inorganic	
Space 62	Field Filtered – Organic	
Spaces 63-102	Sample Appearance	
Spaces 103-142	Collector Comments	
Spaces 143-149	Filler 3	
Spaces 150-199	Lab Comments	

EXHIBIT C

CERTIFIED MAIL NUMBER: 7008 0500 0000 0550 1492
RETURN RECEIPT REQUESTED

September 30, 2009

Mr. Rob Watson, P.E.
Illinois Environmental Protection Agency
Bureau of Land #33, Permit Section
P.O. Box 19276
Springfield, IL 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 S. Hancock Avenue
Freeport, IL 61032
IL ID No: 1770200010
Permit No: B-167-M-8**

Dear Mr. Watson:

On behalf of Modern Plating, please find enclosed the original and three copies of a RCRA Permit Modification request pursuant to Special Condition II.G.3. of the above-referenced RCRA Permit. Per our discussion, the following is included with this submittal:

- Form LPC-PA23
- Updated Leachate Values
- Updated Post Closure Care Cost Estimate
- Updated CAMU Financial Assurance

As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average leachate value. Please update Special Condition II.G.1. and Attachment A of the aforementioned permit accordingly, based on the attached data.

If you have any questions or need any additional information, please do not hesitate to contact this office.

Respectfully submitted,

Christopher L. Posey, CHMM
Project Manager

CLP:mll

I:\Documents\SEC 2009\09-112\CLP 09-112 - RCRA Modification Letter.doc

Attachment

cc: James Stenberg, Modern Plating Corporation
Attorney James Meason
Lucille Miller



Illinois
Environmental
Protection Agency

Bureau of Land
1021 North Grand Avenue East
Box 19276
Springfield, IL 62794-9276

**INSTRUCTIONS
FOR
RCRA Permit Application Form LPC-PA23**

The following instructions are designed to aid in the completion of the RCRA Permit Application Form LPC-PA23. If you have additional questions regarding the form, or the informational requirements, please contact the Illinois EPA Bureau of Land (BOL) Permit Section at 217-524-3300.

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. If an application has already been submitted to the Agency, a completed RCRA Permit Application Form must accompany all additional information that is submitted to the agency for that application. An example of “additional information” would be a response to verbal or written comments from the Agency. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

I. Site Identification

Enter all of the required information in the space provided. If you do not have an Illinois or USEPA identification number, call the Illinois EPA BOL Waste Reduction and Compliance Section at 217/785-8604 to obtain these numbers prior to completing the form.

II. Owner/Operator Identification

The terms “owner” and “operator” are defined at 35 IAC 720.110 and 702.110. If the facility has the same owner and operator, you may type in “same” under operator information. Also, if the contact person for an application is different from the owner or operator (i.e. the consultant), please indicate this in the cover letter for the application.

III. Permit Application Identification

Indicate both the type of application and the kind of waste management involved. For instance, if the application involves more than one type of waste management, check all applicable options.

IV. Signatures

The signatory requirements for permit applicants are identified at 35 IAC 702.126 and 702.151. If the facility has the same owner and operator, you may type in “same” under operator information.

Notary Public: A notary public’s signature and stamp are required for both the owner and operator signatures on the form.

Engineer Certification: A professional engineer that is licensed in the State of Illinois must certify all technical information provided in a permit application. 35 IAC 703.182 describes the types of information that must be certified by a professional engineer.



Illinois
Environmental
Protection Agency

Bureau of Land
1021 North Grand Avenue East
Box 19276
Springfield, IL 62794-9276

RCRA Permit Application Form LPC-PA23

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to 1021 North Grand Avenue East between the hours of 8:30 a.m. to 5:00 p.m., Monday through Friday (excluding State holidays).

Please type or print all information legibly.

I. SITE IDENTIFICATION

Site # (Illinois EPA): 1770200010 USEPA ID Number: ILD005172325
 Site Name: Modern Plating Corporation
 Physical Site Location (street, road, etc.): 701 S. Hancock Avenue
 City, Zip Code: Freeport, IL 61032 County: Stephenson
 Existing RCRA Permit (if applicable): B-167-M-8

II. OWNER/OPERATOR IDENTIFICATION

OWNER

OPERATOR

Name: <u>Lucille Miller</u>	<u>James R. Stenberg</u>
Address: <u>701 S. Hancock Avenue</u>	<u>701 S. Hancock Avenue</u>
<u>P.O. Box 838</u>	<u>P.O. Box 838</u>
<u>Freeport, IL 61032-0838</u>	<u>Freeport, IL 61032-0838</u>
Contact Name: <u>David Servatius</u>	<u>Same</u>
Phone #: <u>(815) 235-3111</u>	<u>(815) 235-3111</u>

III. PERMIT APPLICATION IDENTIFICATION

APPLICATION TYPE:

- New Part B Permit
- Part B Permit Renewal
- Class 1 Modification
- Class 1* (prior approval required) Modification
- Class 2 Modification
- Class 3 Modification
- Additional information to supplement application Log Number _____

APPLICATION TYPE cont.:

- Remedial Action Plan Permit (RAPP)
- Sig RAPP Modification
- Non Sig RAPP Modification
- Major UIC Modification
- Minor UIC Modification

THIS APPLICATION INVOLVES:

- Storage
- Treatment
- Disposal
- Incineration
- Groundwater
- Corrective Action
- UIC Class I
- UIC Class V

DESCRIPTION OF THIS PERMIT REQUEST: (Include a brief narrative description here.)

Annual requirement (Special Condition II.G.3.) for RCRA permit modification to update the post-closure cost estimate and amount of financial insurance based on 3-year rolling average leachate generation.

IL 532-2792
LPC 625

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

Electronic Filing: Received, Clerk's Office 02/03/2026

IV. **SIGNATURES** Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

OWNER

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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): Lucille Miller
Owner Signature: _____ Title: _____ Date: _____

OPERATOR

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): James R. Stenberg
Operator Signature: _____ Title: _____ Date: _____

NOTARY: (Required for both owner and operator signatures)

Subscribe and sworn before me this ____ day of _____, _____.

Notary Signature: _____ Notary Seal:

My commission expires on: _____

ENGINEER

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Printed or Typed): Richard T. Weegens

Engineer Signature: _____ Illinois License No.: 062-044672

Expiration Date of License: 11-09

Engineer Address: Fehr-Graham & Associates Engineer Seal:

221 E. Main Street, Suite #200

Freeport, IL 61032

Engineer Phone No. (815)235-7643

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

**Updated Post Closure Care Cost Estimate
For Modern Plating Corporation**

**RCRA Post-Closure Permit
IEPA No.: ID #1770200010
USEPA ID No.: 005172325**

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,000 each	\$1,000
2.	Land Surface Care <ul style="list-style-type: none"> • Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) • Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) • Snow Plowing (Assume 2 snowfall events) 	1.8 cy	\$50/cy	\$90
		0.2 acres	\$2,500/acre	\$500
		2 each	\$200 each	\$400
3.	Leachate Treatment ¹	7,598 ³ gal/yr	\$0.02/gal	\$152
4.	Leachate Hauling ²	7,598 gal/yr	\$0.20/gal	\$1,520

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> • Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) • Leak Detection System (LDS) Monitoring (1 location, 12 times/year) • Leachate Monitoring (1 location, 2 times/year) • Surface Water Monitoring (2 locations, 2 times/year) 	2 sample events per yr	\$4,760/event	\$9,520
		12 events	\$100/event	\$1,200
		2 samples	\$140/sample	\$280
		4 samples	\$40/sample	\$160
6.	Mowing (2 acres per year)	2 acres	\$50/acre	\$100
7.	Landfill Sump Pump (Replace each pump every 5 years)	12 pumps	\$1,400/pump	\$560 ⁴
Subtotal				\$15,482
Contingency (10%)				\$1,548
Total Cost per Year				\$17,030

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site

³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

⁴ Prorated to an annual cost over the 30-year long-term care period.

Modern Plating Corporation
Daily CAMU Pumping

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
2004	1-1-04 through 12-31-04	1849	8477	10326
2005	1-1-05 through 12-31-05	3918	7769	11687
2006	1-1-06 through 12-31-06	1624	3331	4955
2007	9-1-06 through 8-31-07	2383	2987	5370
2008	9-1-07 through 8-31-08	5501	5378	10879
2009	9-1-08 through 8-31-09	2628	3918	6546

Note: Per the RCRA Permit, starting with reporting year 2007, annual values are representative of the time period from September 1st through August 31st

Prior 3-year average (2007 through 2009):

7598 gallons/year

Electronic Filing: Received, Clerk's Office 02/03/2026

CAMU Financial Assurance

Annual Maintenance Cost \$ 17,050

	Years Remaining	Financial Assurance Amount
2009	22	\$ 375,100
2010	21	\$ 358,050
2011	20	\$ 341,000
2012	19	\$ 323,950
2013	18	\$ 306,900
2014	17	\$ 289,850
2015	16	\$ 272,800
2016	15	\$ 255,750
2017	14	\$ 238,700
2018	13	\$ 221,650
2019	12	\$ 204,600
2020	11	\$ 187,550
2021	10	\$ 170,500
2022	9	\$ 153,450
2023	8	\$ 136,400
2024	7	\$ 119,350
2025	6	\$ 102,300
2026	5	\$ 85,250
2027	4	\$ 68,200
2028	3	\$ 51,150
2029	2	\$ 34,100
2030	1	\$ 17,050

9/21/2010

**Updated Post Closure Care Cost Estimate
For Modern Plating Corporation**

**RCRA Post-Closure Permit
IEPA No.: ID #1770200010
USEPA ID No.: 005172325**

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,000 each	\$1,000
2.	Land Surface Care <ul style="list-style-type: none"> • Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) • Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) • Snow Plowing (Assume 2 snowfall events) 	1.8 cy	\$50/cy	\$90
		0.2 acres	\$2,500/acre	\$500
		2 each	\$200 each	\$400
3.	Leachate Treatment ¹	6,461 ³ gal/yr	\$0.02/gal	\$129
4.	Leachate Hauling ²	6,461 gal/yr	\$0.20/gal	\$1,292

9/21/2010

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> • Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) • Leak Detection System (LDS) Monitoring (1 location, 12 times/year) • Leachate Monitoring (1 location, 2 times/year) • Surface Water Monitoring (2 locations, 2 times/year) 	2 sample events per yr	\$4,760/event	\$9,520
		12 events	\$100/event	\$1,200
		2 samples	\$140/sample	\$280
		4 samples	\$40/sample	\$160
6.	Mowing (2 acres per year)	2 acres	\$50/acre	\$100
7.	Landfill Sump Pump (Replace each pump every 5 years)	12 pumps	\$1,400/pump	\$560 ⁴
Subtotal				\$15,231
Contingency (10%)				\$1,523
Total Cost per Year				\$16,754

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site

³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

⁴ Prorated to an annual cost over the 30-year long-term care period.

Modern Plating Corporation

Daily CAMU Pumping

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
2004	1-1-04 through 12-31-04	1849	8477	10326
2005	1-1-05 through 12-31-05	3918	7769	11687
2006	1-1-06 through 12-31-06	1624	3331	4955
2007	9-1-06 through 8-31-07	2383	2987	5370
2008	9-1-07 through 8-31-08	5501	5378	10879
2009	9-1-08 through 8-31-09	2628	3918	6546
2010	9-1-09 through 8-31-10	469	1488	1957

Note: Per the RCRA Permit, starting with reporting year 2007, annual values are representative of the time period from September 1st through August 31st

Prior 3-year average (2008 through 2010):

6461 gallons/year

CERTIFIED MAIL NO.
RETURN RECEIPT REQUESTED

October 11, 2011

Mr. Rob Watson, P.E.
Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
P.O. Box 19276
Springfield, IL 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 S. Hancock Avenue
Freeport, IL 61032
IL ID No: 1770200010
Permit No: B-167-M-8**

Dear Mr. Watson:

On behalf of Modern Plating, please find enclosed the original and three copies of a RCRA Permit Modification request pursuant to Special Condition II.G.3. of the above-referenced RCRA Permit. As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average. Please update Special Condition II.G.1. and Attachment A of the aforementioned permit accordingly, based on the attached data.

The following is included with this submittal:

- Form LPC-PA23
- Attachment 1
 - Updated Leachate Values
 - Updated Post Closure Care Cost Estimate
 - Updated CAMU Financial Assurance

If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,

Jason Miller, CHMM
Environmental Specialist

JM:mll

I:\Documents\2011\11-112 - Modern Plating\2011 RCRA Permit Modification\11-112 - RCRA Modification Letter.doc

cc: James Stenberg, Modern Plating Corporation
Attorney James Meason



Illinois
Environmental
Protection Agency

Bureau of Land
1021 North Grand Avenue East
Box 19276
Springfield, IL 62794-9276

RCRA Permit Application Form LPC-PA23

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to 1021 North Grand Avenue East between the hours of 8:30 a.m. to 5:00 p.m., Monday through Friday (excluding State holidays).

Please type or print all information legibly.

I. SITE IDENTIFICATION

Site # (Illinois EPA): 1770200010 USEPA ID Number: ILD005172325
Site Name: Modern Plating Corporation
Physical Site Location (street, road, etc.): 701 S. Hancock Avenue
City, Zip Code: Freeport, IL 61032 County: Stephenson
Existing RCRA Permit (if applicable): B-167-M-8

II. OWNER/OPERATOR IDENTIFICATION

OWNER

OPERATOR

Name: Lucille Miller James R. Stenberg
Address: 701 S. Hancock Avenue 701 S. Hancock Avenue
P.O. Box 838 P.O. Box 838
Freeport, IL 61032-0838 Freeport, IL 61032-0838
Contact Name: David Servatius Same
Phone #: (815) 235-3111 (815) 235-3111

III. PERMIT APPLICATION IDENTIFICATION

APPLICATION TYPE:

- New Part B Permit
- Part B Permit Renewal
- Class 1 Modification
- Class 1* (prior approval required) Modification
- Class 2 Modification
- Class 3 Modification
- Additional information to supplement application Log Number _____

APPLICATION TYPE cont.:

- Remedial Action Plan Permit (RAPP)
- Sig RAPP Modification
- Non Sig RAPP Modification
- Major UIC Modification
- Minor UIC Modification

THIS APPLICATION INVOLVES:

- Storage
- Treatment
- Disposal
- Incineration
- Groundwater
- Corrective Action
- UIC Class I
- UIC Class V

DESCRIPTION OF THIS PERMIT REQUEST: (Include a brief narrative description here.)

Annual requirement (Special Condition II.G.3.) for RCRA permit modification to update the post-closure cost estimate and amount of financial insurance based on 3-year rolling average leachate generation.

IL 532-2792
LPC 625

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

Electronic Filing: Received, Clerk's Office 02/03/2026

IV. **SIGNATURES** Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

OWNER

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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): Lucille Miller

Owner Signature: _____ Title: _____ Date: _____

OPERATOR

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): James R. Stenberg

Operator Signature: _____ Title: _____ Date: _____

NOTARY: (Required for both owner and operator signatures)

Subscribe and sworn before me this _____ day of _____, _____.

Notary Signature: _____ Notary Seal: _____

My commission expires on: _____

ENGINEER

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Printed or Typed): Richard T. Weegens

Engineer Signature: _____ Illinois License No.: 062-044672

Expiration Date of License: 11/30/2011

Engineer Address: Fehr-Graham & Associates
221 E. Main Street, Suite #200
Freeport, IL 61032

Engineer Seal: _____

Engineer Phone No. (815)235-7643

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

CAMU Financial Assurance

Annual Maintenance Cost \$ 15,877

	Years Remaining	Financial Assurance Amount
2012	19	\$ 301,663
2013	18	\$ 285,786
2014	17	\$ 269,909
2015	16	\$ 254,032
2016	15	\$ 238,155
2017	14	\$ 222,278
2018	13	\$ 206,401
2019	12	\$ 190,524
2020	11	\$ 174,647
2021	10	\$ 158,770
2022	9	\$ 142,893
2023	8	\$ 127,016
2024	7	\$ 111,139
2025	6	\$ 95,262
2026	5	\$ 79,385
2027	4	\$ 63,508
2028	3	\$ 47,631
2029	2	\$ 31,754
2030	1	\$ 15,877

**Updated Post Closure Care Cost Estimate
For Modern Plating Corporation**

**RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: 005172325**

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,000 each	\$1,000
2.	Land Surface Care <ul style="list-style-type: none"> • Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) • Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) • Snow Plowing (Assume 2 snowfall events) 	1.8 cy 0.2 acres 2 each	\$50/cy \$2,500/acre \$200 each	\$90 \$500 \$400
3.	Leachate Treatment ¹	2,834 ³ gal/yr	\$0.02/gal	\$57
4.	Leachate Hauling ²	2,834 gal/yr	\$0.20/gal	\$567

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> • Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) • Leak Detection System (LDS) Monitoring (1 location, 12 times/year) • Leachate Monitoring (1 location, 2 times/year) • Surface Water Monitoring (2 locations, 2 times/year) 	2 sample events per yr 12 events 2 samples 4 samples	\$4,760/event \$100/event \$140/sample \$40/sample	\$9,520 \$1,200 \$280 \$160
6.	Mowing (2 acres per year)	2 acres	\$50/acre	\$100
7.	Landfill Sump Pump (Replace each pump every 5 years)	12 pumps	\$1,400/pump	\$560 ⁴
			Subtotal	\$14,434
			Contingency (10%)	\$1,443
			Total Cost per Year	\$15,877

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site

³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

⁴ Prorated to an annual cost over the 30-year long-term care period.

**Modern Plating Corporation
Daily CAMU Pumping**

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
2004	1-1-04 through 12-31-04	1849	8477	10326
2005	1-1-05 through 12-31-05	3918	7769	11687
2006	1-1-06 through 12-31-06	1624	3331	4955
2007	9-1-06 through 8-31-07	2383	2987	5370
2008	9-1-07 through 8-31-08	5501	5378	10879
2009	9-1-08 through 8-31-09	2628	3918	6546
2010	9-1-09 through 8-31-10	469	1488	1957
2011	9-1-10 through 8-31-11	0	0	0

Note: Per the RCRA Permit, starting with reporting year 2007, annual values are representative of the time period from September 1st through August 31st

Prior 3-year average (2009 through 2011):

2834 gallons/year

Certified Mail No.: 7009 2250 0003 3277 8575

Return Receipt Requested

September 18, 2012

Mr. Mark Crites, P.E.
Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
P.O. Box 19276
Springfield, IL 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 South Hancock Avenue
Freeport, IL 61032
IL ID No: 1770200010
Permit No: B-167-M-10**

Dear Mr. Crites:

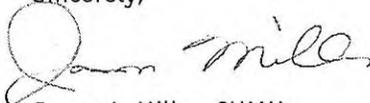
On behalf of Modern Plating, please find enclosed the original and three copies of a RCRA Permit Modification request pursuant to Section II.F.3. of the above-referenced RCRA Permit. As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average. Please update Section II.F.1. and Attachment A of the aforementioned permit accordingly, based on the attached data.

The following is included with this submittal:

- Form LPC-PA23
- Attachment 1
 - Updated Leachate Values
 - Updated Post Closure Care Cost Estimate
 - Updated CAMU Financial Assurance

If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,



Jason A. Miller, CHMM
Environmental Specialist

JAM:llk

O:\Modern Plating Corporation\12-112\Final\12-112 - RCRA Modification Letter.doc

cc: James Stenberg, Modern Plating Corporation



Illinois Environmental Protection Agency

Bureau of Land • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

RCRA Permit Application Form LPC-PA23

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to 1021 North Grand Avenue East between the hours of 8:30 a.m. to 5:00 p.m., Monday through Friday (excluding State holidays).

Please type or print all information legibly.

I. Site Identification

Site # (Illinois EPA): 1770200010 USEPA ID Number: ILD005172325
Site Name: Modern Plating Corporation
Physical Site Location (street, road, etc.): 701 S. Hancock Avenue
City: Freeport Zip Code: 61032 County: Stephenson
Existing RCRA Permit (if applicable): B-167-M-10

II. Owner/Operator Identification

Owner Information

Name: Lucille Miller
Mailing Address: 701 S. Hancock Avenue
PO Box 838
Freeport, IL 61032-0838
Contact Name: David Servatius
Phone #: 815-235-3111

Operator Information

Name: James R. Stenberg
Mailing Address: 701 S. Hancock Avenue
PO Box 838
Freeport, IL 61032-0838
Contact Name: Same
Phone #: 815-235-3111

III. Permit Application Identification

Application Type

- New Part B Permit
- Part B Permit Renewal
- Class 2 Modification
- Additional information to supplement UIC Class I application Log Number
- Class 1 Modification
- Class 1* (prior approval required) Modification
- Class 3 Modification

Electronic Filing: Received, Clerk's Office 02/03/2026

Application Type contd.

- Remedial Action Plan Permit (RAPP) Sig RAPP Modification
 Non Sig RAPP Modification Major UIC Modification
 Minor UIC Modification

This Application Involves

- Storage Treatment Disposal Incineration
 Groundwater Corrective Action UIC Class I UIC Class V

Description of This Permit Request: (Include a brief narrative description here.)

Annual requirement (Section II F3) for RCRA permit modification to update the post-closure cost estimate and amount of financial insurance based on 3-year rolling average leachate generation.

IV. **SIGNATURES** Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

Owner

- 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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

- Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): Lucille Miller

Owner Signature: *Lucille Miller*

Date: 9-19-12

Title: _____

Operator

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): James R. Stenberg

Operator Signature: *James R. Stenberg*

Date: 9-18-12

Title: PRESIDENT / CEO

NOTARY: (Required for both owner and operator signatures)

Subscribe and sworn before me this 19 day of September, 2012

Notary Signature: Bridget B. Manthei
My commission expires on: 4-20-15



Engineer

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Printed or Typed): Richard T. Weegens

Engineer Signature: Richard T. Weegens

Illinois License No.: 062-044672

Expiration Date of License: 11/30/2013

Engineer Phone No. 815-235-7643

Engineer Address:

Fehr Graham
221 East Main Street, Suite 200
Freeport, IL 61032

Engineer Seal:



All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

9/18/2012

**Updated Post Closure Care Cost Estimate
For Modern Plating Corporation**

**RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: 005172325**

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,000 each	\$1,000
2.	Land Surface Care <ul style="list-style-type: none"> <li data-bbox="730 630 812 945">• Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) <li data-bbox="812 630 893 945">• Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) <li data-bbox="893 630 974 945">• Snow Plowing (Assume 2 snowfall events) 	1.8 cy	\$50/cy	\$90
		0.2 acres	\$2,500/acre	\$500
		2 each	\$200 each	\$400
3.	Leachate Treatment ¹	652 ³ gal/yr	\$0.02/gal	\$13
4.	Leachate Hauling ²	652 gal/yr	\$0.20/gal	\$130

9/18/2012

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> <li data-bbox="324 472 365 808">• Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) <li data-bbox="365 472 406 808">• Leak Detection System (LDS) Monitoring (1 location, 12 times/year) <li data-bbox="406 472 446 808">• Leachate Monitoring (1 location, 2 times/year) <li data-bbox="446 472 487 808">• Surface Water Monitoring (2 locations, 2 times/year) 	2 sample events per yr 12 events 2 samples 4 samples	\$4,760/event \$100/event \$140/sample \$40/sample	\$9,520 \$1,200 \$280 \$160
6.	Mowing (2 acres per year)	2 acres	\$50/acre	\$100
7.	Landfill Sump Pump (Replace each pump every 5 years)	12 pumps	\$1,400/pump	\$560 ⁴
			Subtotal	\$13,953
			Contingency (10%)	\$1,395
			Total Cost per Year	\$15,348

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site

³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

⁴ Prorated to an annual cost over the 30-year long-term care period.

**Modern Plating Corporation
Daily CAMU Pumping**

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
2004	1-1-04 through 12-31-04	1849	8477	10326
2005	1-1-05 through 12-31-05	3918	7769	11687
2006	1-1-06 through 12-31-06	1624	3331	4955
2007	9-1-06 through 8-31-07	2383	2987	5370
2008	9-1-07 through 8-31-08	5501	5378	10879
2009	9-1-08 through 8-31-09	2628	3918	6546
2010	9-1-09 through 8-31-10	469	1488	1957
2011	9-1-10 through 8-31-11	0	0	0
2012	9-1-11 through 8-31-12	0	0	0

Note: Per the RCRA Permit, starting with reporting year 2007, annual values are representative of the time period from September 1st through August 31st

Prior 3-year average (2010 through 2012):

652 gallons/year

Electronic Filing: Received, Clerk's Office 02/03/2026
Modern Plating Corporation

CAMU Financial Assurance

Annual Maintenance Cost \$ 15,348

	Years Remaining	Financial Assurance Amount
2013	18	\$ 276,264
2014	17	\$ 260,916
2015	16	\$ 245,568
2016	15	\$ 230,220
2017	14	\$ 214,872
2018	13	\$ 199,524
2019	12	\$ 184,176
2020	11	\$ 168,828
2021	10	\$ 153,480
2022	9	\$ 138,132
2023	8	\$ 122,784
2024	7	\$ 107,436
2025	6	\$ 92,088
2026	5	\$ 76,740
2027	4	\$ 61,392
2028	3	\$ 46,044
2029	2	\$ 30,696
2030	1	\$ 15,348

Certified Mail No.: 7013 0600 0000 4393 5441
Return Receipt Requested

September 18, 2013

Mr. Mark Crites, P.E.
Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
P.O. Box 19276
Springfield, IL 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 South Hancock Avenue, Freeport, IL 61032
IL ID No: 1770200010
Permit No: B-167-M-10**

Dear Mr. Crites:

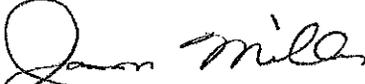
On behalf of Modern Plating, please find enclosed the original and three (3) copies of the RCRA Permit Modification request pursuant to Section II.F.3. of the above-referenced RCRA Permit. As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average. Please update Section II.F.1. and Attachment A of the aforementioned permit accordingly, based on the attached data.

The following is included with this submittal:

- Form LPC-PA23
- Attachment 1
 - Updated Leachate Values
 - Updated Post Closure Care Cost Estimate
 - Updated CAMU Financial Assurance

If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,


Jason A. Miller, CHMM
Environmental Specialist

JAM:mll

Attachments

cc: James Stenberg, Modern Plating Corporation

**Updated Post Closure Care Cost Estimate
For Modern Plating Corporation**

**RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: ILD005172325**

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,000 each	\$1,000
2.	Land Surface Care <ul style="list-style-type: none"> • Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) • Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) • Snow Plowing (Assume 2 snowfall events) 	1.8 cy 0.2 acres 2 each	\$50/cy \$2,500/acre \$200 each	\$90 \$500 \$400
3.	Leachate Treatment ¹	0 ³ gal/yr	\$0.02/gal	\$0.00
4.	Leachate Hauling ²	0 gal/yr	\$0.20/gal	\$0.00

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> • Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) • Leak Detection System (LDS) Monitoring (1 location, 12 times/year) • Leachate Monitoring (1 location, 2 times/year) • Surface Water Monitoring (2 locations, 2 times/year) 	2 sample events per yr 12 events 2 samples 4 samples	\$3,149/event \$100/event \$140/sample \$40/sample	\$6,298 \$1,200 \$280 \$160
6.	Mowing (2 acres per year)	2 acres	\$50/acre	\$100
7.	Landfill Sump Pump (Replace each pump every 5 years)	12 pumps	\$1,400/pump	\$560 ⁴
		Subtotal		\$10,588
			Contingency (10%)	\$1,059
			Total Cost per Year	\$11,647

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site

³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

⁴ Prorated to an annual cost over the 30-year long-term care period.

CAMU Financial Assurance

Annual Maintenance Cost \$ 11,647

	Years Remaining	Financial Assurance Amount
2014	17	\$ 197,999
2015	16	\$ 186,352
2016	15	\$ 174,705
2017	14	\$ 163,058
2018	13	\$ 151,411
2019	12	\$ 139,764
2020	11	\$ 128,117
2021	10	\$ 116,470
2022	9	\$ 104,823
2023	8	\$ 93,176
2024	7	\$ 81,529
2025	6	\$ 69,882
2026	5	\$ 58,235
2027	4	\$ 46,588
2028	3	\$ 34,941
2029	2	\$ 23,294
2030	1	\$ 11,647

**Modern Plating Corporation
Daily CAMU Pumping**

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
2004	1-1-04 through 12-31-04	1849	8477	10326
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2011	9-1-10 through 8-31-11	0	0	0
2012	9-1-11 through 8-31-12	0	0	0
2013	9-1-12 through 8-31-13	0	0	0

Note: Per the RCRA Permit, starting with reporting year 2007, annual values are representative of the time period from September 1st through August 31st

Prior 3-year average (2011 through 2013):

0 gallons/year

Certified Mail No.: 7011 3500 0002 9994 3188
Return Receipt Requested

September 18, 2014

Mr. Mark Crites, P.E.
Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
P.O. Box 19276
Springfield, IL 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 South Hancock Avenue, Freeport, IL 61032
IL ID No: 1770200010
Permit No: B-167-M-10**

Dear Mr. Crites:

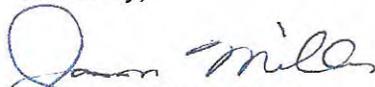
On behalf of Modern Plating, please find attached the original and three (3) copies of the RCRA Permit Modification request pursuant to Section II.F.3. of the above-referenced RCRA Permit. As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average. Please update Section II.F.1. and Attachment A of the aforementioned permit accordingly, based on the attached data.

The following is included with this submittal:

- Form LPC-PA23
- Attachment 1
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 - Updated Post Closure Care Cost Estimate
 - Updated CAMU Financial Assurance

If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,



Jason A. Miller, CHMM
Environmental Scientist

JAM:mll

Attachments

cc: James Stenberg, Modern Plating Corporation

O:\Modern Plating Corporation\14-112\Final\JAM 14-112 - RCRA Modification Letter.doc



Illinois Environmental Protection Agency

Bureau of Land • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

RCRA Permit Application Form LPC-PA23

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

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Please type or print all information legibly.

I. Site Identification

Site # (Illinois EPA): 1770200010 USEPA ID Number: ILD005172325
Site Name: Modern Plating Corporation
Physical Site Location (street, road, etc.): 701 S. Hancock Avenue
City: Freeport Zip Code: 61032 County: Stephenson
Existing RCRA Permit (if applicable): B-167-M-10

II. Owner/Operator Identification

Owner Information

Name: Lucille Miller
Mailing Address:
701 S. Hancock Avenue
PO Box 838
Freeport, IL 61032-0838
Contact Name: David Servatius
Phone #: 815-235-3111

Operator Information

Name: James R. Stenberg
Mailing Address:
701 S. Hancock Avenue
PO Box 838
Freeport, IL 61032-0838
Contact Name: David Servatius
Phone #: 815-235-3111

III. Permit Application Identification

Application Type

- New Part B Permit
- Part B Permit Renewal
- Class 2 Modification
- Additional information to supplement UIC Class I application Log Number
- Class 1 Modification
- Class 1* (prior approval required) Modification
- Class 3 Modification

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

Electronic Filing: Received, Clerk's Office 02/03/2026

Application Type contd.

- Remedial Action Plan Permit (RAPP) Sig RAPP Modification
 Non Sig RAPP Modification Major UIC Modification
 Minor UIC Modification

This Application Involves

- Storage Treatment Disposal Incineration
 Groundwater Corrective Action UIC Class I UIC Class V

Description of This Permit Request: (Include a brief narrative description here.)

Annual requirement (Section II F3) for RCRA permit modification to update the post-closure cost estimate and amount of financial insurance based on 3-year rolling average leachate generation.

IV. SIGNATURES Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

Owner

- 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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

- Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): Lucille Miller

Owner Signature: _____ Date: _____

Title: _____

Operator

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): James R. Stenberg

Operator Signature: _____ Date: _____

Title: _____

Electronic Filing: Received, Clerk's Office 02/03/2026

NOTARY: (Required for both owner and operator signatures)

Subscribe and sworn before me this _____ day of _____, _____.

Notary Signature: _____ Notary Seal:

My commission expires on: _____

Engineer

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Printed or Typed): Richard T. Weegens

Engineer Signature: _____

Illinois License No.: 062-044672

Expiration Date of License: 11/30/2015

Engineer Seal:

Engineer Phone No. 815-235-7643

Engineer Address:

Fehr Graham

221 East Main Street, Suite 200

Freeport, IL 61032

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

9/15/2014

**Updated Post Closure Care Cost Estimate
For Modern Plating Corporation**

**RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: ILD005172325**

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,000 each	\$1,000
2.	Land Surface Care <ul style="list-style-type: none"> • Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) • Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) • Snow Plowing (Assume 2 snowfall events) 	1.8 cy 0.2 acres 2 each	\$50/cy \$2,500/acre \$200 each	\$90 \$500 \$400
3.	Leachate Treatment ¹	0 ³ gal/yr	\$0.02/gal	\$0.00
4.	Leachate Hauling ²	0 gal/yr	\$0.20/gal	\$0.00

9/15/2014

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> • Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) • Personnel For Sample Collection • Preparation & submittal of semi-annual groundwater monitoring report • Leachate Detection System (LDS) Monitoring (1 location, 12 times/year) • Leachate Monitoring (1 location, 2 times/year) • Preparation & submittal of 5-year minimum GMZ evaluation • Surface Water Monitoring (2 locations, 2 times/year) 	2 sample events per yr 2 sample events per yr 2/yr 12 events 2 samples 1/5 yrs 4 samples	\$3,149/event \$3,551/event \$1775/event \$100/event \$140/sample \$5,000 \$40/sample	\$6,298 \$7,102 \$3,550 \$1,200 \$280 \$1,000 \$160
6.	Mowing (2 acres per year)	2 acres	\$50/acre	\$100
7.	Landfill Sump Pump (Replace each pump every 5 years)	12 pumps	\$1,400/pump	\$560 ⁴
Subtotal				\$22,240
Contingency (10%)				\$2,224

9/15/2014

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
Total Cost per Year				\$24,464

- ¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant
- ² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site
- ³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal
- ⁴ Prorated to an annual cost over the 30-year long-term care period.

O:\Modern Plating Corporation\Environmental Compliance\Annual RCRA Permit Modification\2014\2014 Updated Post Closure Care Cost Estimate Table.doc

CAMU Financial Assurance

Annual Maintenance Cost \$ 24,464

	Years Remaining	Financial Assurance Amount
2015	16	\$ 391,424
2016	15	\$ 366,960
2017	14	\$ 342,496
2018	13	\$ 318,032
2019	12	\$ 293,568
2020	11	\$ 269,104
2021	10	\$ 244,640
2022	9	\$ 220,176
2023	8	\$ 195,712
2024	7	\$ 171,248
2025	6	\$ 146,784
2026	5	\$ 122,320
2027	4	\$ 97,856
2028	3	\$ 73,392
2029	2	\$ 48,928
2030	1	\$ 24,464

**Modern Plating Corporation
Daily CAMU Pumping**

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
2004	1-1-04 through 12-31-04	1849	8477	10326
2005	1-1-05 through 12-31-05	3918	7769	11687
2006	1-1-06 through 12-31-06	1624	3331	4955
2007	9-1-06 through 8-31-07	2383	2987	5370
2008	9-1-07 through 8-31-08	5501	5378	10879
2009	9-1-08 through 8-31-09	2628	3918	6546
2010	9-1-09 through 8-31-10	469	1488	1957
2011	9-1-10 through 8-31-11	0	0	0
2012	9-1-11 through 8-31-12	0	0	0
2013	9-1-12 through 8-31-13	0	0	0
2014	9-1-13 through 8-31-14	0	0	0

Note: Per the RCRA Permit, starting with reporting year 2007, annual values are representative of the time period from September 1st through August 31st

Prior 3-year average (2012 through 2014):

0 gallons/year



Certified Mail No.: 7015 0640 0002 6881 3575
Return Receipt Requested

September 15, 2015

Mr. Mark Crites, P.E.
Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
P.O. Box 19276
Springfield, IL 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 South Hancock Avenue, Freeport, IL 61032
IL ID No: 1770200010
Permit No: B-167-M-10**

Dear Mr. Crites:

On behalf of Modern Plating Corporation, please find attached the original and three (3) copies of the RCRA Permit Modification request pursuant to Section II.F.3. of the above-referenced RCRA Permit. As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average. Please update Section II.F.1. and Attachment A of the aforementioned permit accordingly, based on the attached data.

The following is included with this submittal:

- Form LPC-PA23
- Attachment 1
 - Updated Leachate Values
 - Updated Post Closure Care Cost Estimate
 - Updated CAMU Financial Assurance

If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink that reads "Jason Miller". The signature is written in a cursive style.

Jason A. Miller, CHMM
Environmental Scientist

JAM:mll

Attachments

cc: James Stenberg, Modern Plating Corporation

O:\Modern Plating Corporation\15-112\Final\JAM 15-112 - RCRA Modification Letter.doc



Illinois Environmental Protection Agency

Bureau of Land • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

RCRA Permit Application Form LPC-PA23

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to 1021 North Grand Avenue East between the hours of 8:30 a.m. to 5:00 p.m., Monday through Friday (excluding State holidays).

Please type or print all information legibly.

I. Site Identification

Site # (Illinois EPA): 1770200010 USEPA ID Number: ILD005172325
 Site Name: Modern Plating Corporation
 Physical Site Location (street, road, etc.): 701 S. Hancock Avenue
 City: Freeport Zip Code: 61032 County: Stephenson
 Existing RCRA Permit (if applicable): B-167R-M-5

II. Owner/Operator Identification

Owner Information

Name: Modern Plating Corporation
 Mailing Address:
701 S. Hancock Avenue
PO Box 838
Freeport, IL 61032-0838
 Contact Name: James R Stenberg
 Phone #: 815-235-3111

Operator Information

Name: Modern Plating Corporation
 Mailing Address:
701 S. Hancock Avenue
PO Box 838
Freeport, IL 61032-0838
 Contact Name: James R Stenberg
 Phone #: 815-235-3111

III. Permit Application Identification

Application Type

- New Part B Permit Class 1 Modification
 Part B Permit Renewal Class 1* (prior approval required) Modification
 Class 2 Modification Class 3 Modification
 Additional information to supplement UIC Class I application Log Number

Electronic Filing: Received, Clerk's Office 02/03/2026

Application Type contd.

- Remedial Action Plan Permit (RAPP) Sig RAPP Modification
- Non Sig RAPP Modification Major UIC Modification
- Minor UIC Modification

This Application Involves

- Storage Treatment Disposal Incineration
- Groundwater Corrective Action UIC Class I UIC Class V

Description of This Permit Request: (Include a brief narrative description here.)

Annual requirement (Section II F3) for RCRA permit modification to update the post-closure cost estimate and amount of financial insurance based on 3-year rolling average leachate generation.

IV. **SIGNATURES** Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

Owner

- 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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

- Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): Lucille Miller Residuary Trust

Owner Signature: _____ Date: _____

Title: _____

Operator

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): Modern Plating Corporation c/o James R. Stenberg

Operator Signature: _____ Date: _____

Title: President

NOTARY: (Required for both owner and operator signatures)

Subscribe and sworn before me this _____ day of _____, _____.

Notary Signature: _____ Notary Seal:

My commission expires on: _____

Engineer

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Printed or Typed): Richard T. Weegans

Engineer Signature: *Richard T. Weegans*

Illinois License No.: 062-044672

Expiration Date of License: 11/30/2015

Engineer Phone No. 815-235-7643

Engineer Address:
Fehr Graham
221 East Main Street, Suite 200
Freeport, IL 61032

Engineer Seal:



All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

**Modern Plating Corporation
Daily CAMU Pumping**

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
2004	1-1-04 through 12-31-04	1849	8477	10326
2005	1-1-05 through 12-31-05	3918	7769	11687
2006	1-1-06 through 12-31-06	1624	3331	4955
2007	9-1-06 through 8-31-07	2383	2987	5370
2008	9-1-07 through 8-31-08	5501	5378	10879
2009	9-1-08 through 8-31-09	2628	3918	6546
2010	9-1-09 through 8-31-10	469	1488	1957
2011	9-1-10 through 8-31-11	0	0	0
2012	9-1-11 through 8-31-12	0	0	0
2013	9-1-12 through 8-31-13	0	0	0
2014	9-1-13 through 8-31-14	0	0	0
2015	9-1-14 through 8-31-15	0	0	0

Note: Per the RCRA Permit, starting with reporting year 2007, annual values are representative of the time period from September 1st through August 31st

Prior 3-year average (2013 through 2015):

0 gallons/year

9/9/2015

Updated Post Closure Care Cost Estimate
For Modern Plating Corporation

RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: ILD005172325

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,100 each	\$1,100
2.	Land Surface Care <ul style="list-style-type: none"> Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) Snow Plowing (Assume 2 snowfall events) 	1.8 cy 0.2 acres 2 each	\$60/cy \$2,600/acre \$200 each	\$108 \$520 \$400
3.	Leachate Treatment ¹	0 ³ gal/yr	\$0.02/gal	\$0.00
4.	Leachate Hauling ²	0 gal/yr	\$0.20/gal	\$0.00
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) Personnel For Sample Collection Preparation & submittal of semi-annual groundwater monitoring report 	2 sample events per yr 2 sample events per yr 2/yr	\$3,223/event \$3,100/event \$3,250/event	\$6,446 \$6,200 \$6,500

9/9/2015

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
	<ul style="list-style-type: none"> • Leachate Detection System (LDS) Monitoring (1 location, 12 times/year) • Leachate Monitoring (no leachate produced) (1 location, 2 times/year) • Preparation & submittal of 5-year minimum GMZ evaluation (includes 5-yr well elevation surveying) • Surface Water Monitoring (2 locations, 2 times/year) 	<p>12 events</p> <p>0 samples</p> <p>1/5 yrs</p> <p>4 samples</p>	<p>\$100/event</p> <p>\$0.00/sample</p> <p>\$5,000</p> <p>\$40/sample</p>	<p>\$1,200</p> <p>\$0.00</p> <p>\$1,000</p> <p>\$160</p>
6.	Mowing (2 acres per year)	2 acres	\$90/acre	\$180
7.	Landfill Sump Pump (No leachate being produced and none expected)			
		Subtotal		\$23,814
			Contingency (10%)	\$2,381
			Total Cost per Year	\$26,195

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site

³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

Modern Plating Corporation

CAMU Financial Assurance

Annual Maintenance Cost \$ 26,195

	Years Remaining	Financial Assurance Amount
2016	15	\$ 392,925
2017	14	\$ 366,730
2018	13	\$ 340,535
2019	12	\$ 314,340
2020	11	\$ 288,145
2021	10	\$ 261,950
2022	9	\$ 235,755
2023	8	\$ 209,560
2024	7	\$ 183,365
2025	6	\$ 157,170
2026	5	\$ 130,975
2027	4	\$ 104,780
2028	3	\$ 78,585
2029	2	\$ 52,390
2030	1	\$ 26,195

Certified Mail No. 7016 0750 0000 0682 1812
Return Receipt Requested

July 12, 2016

Mr. Mark Crites, P.E.
Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
Post Office Box 19276
Springfield, Illinois 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 South Hancock Avenue, Freeport, Illinois 61032
IL ID No: 1770200010
Permit No: B-167R-M-6**

Dear Mr. Crites:

On behalf of Modern Plating Corporation, please find attached the original and three (3) copies of the RCRA Permit Modification request pursuant to Section II.F.3. of the above-referenced RCRA Permit. The annual post closure care cost estimate was increased by the annual inflation factor of 1 percent.

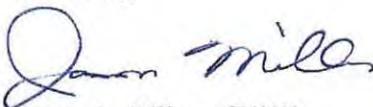
As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average. Please update Section II.F.1. and Attachment A of the aforementioned permit accordingly, based on the enclosed data.

The following is included with this submittal:

- RCRA Permit Application Form LPC-PA23
- Updated Leachate Values
- Updated Post Closure Care Cost Estimate
- Updated CAMU Financial Assurance

If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,



Jason A. Miller, CHMM
Environmental Scientist

JAM:dld

Enclosures

cc: James R. Stenberg, President, Modern Plating Corporation

O:\Modern Plating Corporation\16-112\Final\JAM 16-112 - RCRA Modification Letter.doc

Recycled Paper



Illinois Environmental Protection Agency

Bureau of Land • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

RCRA Permit Application Form LPC-PA23

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to 1021 North Grand Avenue East between the hours of 8:30 a.m. to 5:00 p.m., Monday through Friday (excluding State holidays).

Please type or print all information legibly.

I. Site Identification

Site # (Illinois EPA): 1770200010 USEPA ID Number: ILD005172325
Site Name: Modern Plating Corporation
Physical Site Location (street, road, etc.): 701 S. Hancock Avenue
City: Freeport Zip Code: 61032 County: Stephenson
Existing RCRA Permit (if applicable): B-167R-M-5

II. Owner/Operator Identification

Owner Information

Operator Information

Name: Modern Plating Corporation
Mailing Address:
701 S. Hancock Avenue
PO Box 838
Freeport, IL 61032-0838
Contact Name: James R Stenberg
Phone #: 815-235-3111

Name: Modern Plating Corporation
Mailing Address:
701 S. Hancock Avenue
PO Box 838
Freeport, IL 61032-0838
Contact Name: James R Stenberg
Phone #: 815-235-3111

III. Permit Application Identification

Application Type

- New Part B Permit
- Part B Permit Renewal
- Class 2 Modification
- Additional information to supplement UIC Class I application Log Number
- Class 1 Modification
- Class 1* (prior approval required) Modification
- Class 3 Modification

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

Electronic Filing: Received, Clerk's Office 02/03/2026

Application Type contd.

- Remedial Action Plan Permit (RAPP) Sig RAPP Modification
- Non Sig RAPP Modification Major UIC Modification
- Minor UIC Modification

This Application Involves

- Storage Treatment Disposal Incineration
- Groundwater Corrective Action UIC Class I UIC Class V

Description of This Permit Request: (Include a brief narrative description here.)

Annual requirement (Section II F3) for RCRA permit modification to update the post-closure cost estimate and amount of financial insurance based on 3-year rolling average leachate generation.

IV. **SIGNATURES** Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

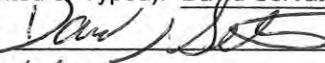
Please check the box of the appropriate certification.

Owner

- 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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

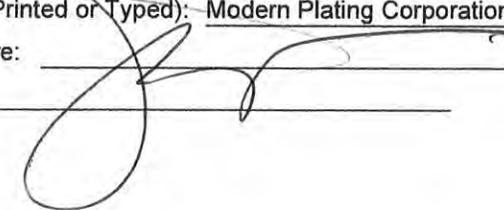
Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

- Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): David Servatius
 Owner Signature:  Date: 2/13/16
 Title: OWNER

Operator

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): Modern Plating Corporation c/o James R. Stenberg
 Operator Signature:  Date: 2/13/16
 Title: President

Electronic Filing: Received, Clerk's Office 02/03/2026

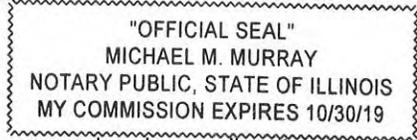
NOTARY: (Required for both owner and operator signatures)

Subscribe and sworn before me this 13th day of July, 2016

Notary Signature: Michael M. Murray

Notary Seal:

My commission expires on: 10-30-19



Engineer

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Printed or Typed): Richard T. Weegens

Engineer Signature: Richard T. Weegens

Illinois License No.: 062-044672

Expiration Date of License: 11/30/2017

Engineer Seal:



Engineer Phone No. 815-235-7643

Engineer Address:

Fehr Graham
221 East Main Street, Suite 200
Freeport, IL 61032

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

**Modern Plating Corporation
Daily CAMU Pumping**

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
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2005	1-1-05 through 12-31-05	3918	7769	11687
2006	1-1-06 through 12-31-06	1624	3331	4955
2007	9-1-06 through 8-31-07	2383	2987	5370
2008	9-1-07 through 8-31-08	5501	5378	10879
2009	9-1-08 through 8-31-09	2628	3918	6546
2010	9-1-09 through 8-31-10	469	1488	1957
2011	9-1-10 through 8-31-11	0	0	0
2012	9-1-11 through 8-31-12	0	0	0
2013	9-1-12 through 8-31-13	0	0	0
2014	9-1-13 through 8-31-14	0	0	0
2015	9-1-14 through 8-31-15	0	0	0
2016	9-1-15 through 8-31-16	0	0	0

Note: Per the RCRA Permit, starting with reporting year 2007, annual values are representative of the time period from September 1st through August 31st

Prior 3-year average (2014 through 2016):

0 gallons/year

**Updated Post Closure Care Cost Estimate
For Modern Plating Corporation**

RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: ILD005172325

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,111 each	\$1,111
2.	Land Surface Care <ul style="list-style-type: none"> • Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) • Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) • Snow Plowing (Assume 2 snowfall events) 	1.8 cy	\$60.6/cy	\$109
		0.2 acres	\$2,626/acre	\$525
		2 each	\$202 each	\$404
3.	Leachate Treatment ¹	0 ³ gal/yr	\$0.02/gal	\$0.00
4.	Leachate Hauling ²	0 gal/yr	\$0.20/gal	\$0.00
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> • Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) • Personnel For Sample Collection • Preparation & submittal of semi-annual groundwater monitoring report 	2 sample events per yr	\$3,255/event	\$6,510
		2 sample events per yr	\$3,131/event	\$6,262
		2/yr	\$3,283/event	\$6,566

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
	<ul style="list-style-type: none"> Leachate Detection System (LDS) Monitoring (1 location, 12 times/year) 	12 events	\$101/event	\$1,212
	<ul style="list-style-type: none"> Leachate Monitoring (no leachate produced) (1 location, 2 times/year) 	0 samples	\$0.00/sample	\$0.00
	<ul style="list-style-type: none"> Preparation & submittal of 5-year minimum GMZ evaluation (includes 5-yr well elevation surveying) 	1/5 yrs	\$5,050	\$1,010
	<ul style="list-style-type: none"> Surface Water Monitoring (2 locations, 2 times/year) 	4 samples	\$40.40/sample	\$162
6.	Mowing (2 acres per year)	2 acres	\$91/acre	\$182
7.	Landfill Sump Pump (No leachate being produced and none expected)			
			Subtotal	\$24,053
			Contingency (10%)	\$2,405
			Total Cost per Year	\$26,458

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site

³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

Electronic Filing: Received, Clerk's Office 02/03/2026
Modern Plating Corporation

CAMU Financial Assurance

Annual Maintenance Cost \$ 26,458

	Years Remaining	Financial Assurance Amount
2017	14	\$ 370,412
2018	13	\$ 343,954
2019	12	\$ 317,496
2020	11	\$ 291,038
2021	10	\$ 264,580
2022	9	\$ 238,122
2023	8	\$ 211,664
2024	7	\$ 185,206
2025	6	\$ 158,748
2026	5	\$ 132,290
2027	4	\$ 105,832
2028	3	\$ 79,374
2029	2	\$ 52,916
2030	1	\$ 26,458

Certified Mail No.: 7016 0750 0000 0684 2909
Return Receipt Requested

July 14, 2017

Mr. Mark Crites, P.E.
Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
Post Office Box 19276
Springfield, Illinois 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 South Hancock Avenue, Freeport, Illinois 61032
IL ID No: 1770200010
Permit No: B-167R-M-8**

Dear Mr. Crites:

On behalf of Modern Plating Corporation, please find attached the original and three (3) copies of the RCRA Permit Modification request pursuant to Section II.F.3. of the above-referenced RCRA Permit. The annual post closure care cost estimate was increased by the annual inflation factor of 1.4 percent.

As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average. Please update Section II.F.1. and Attachment A of the aforementioned permit accordingly, based on the enclosed data.

The following is included with this submittal:

- RCRA Permit Application Form LPC-PA23
- Updated Leachate Values
- Updated Post Closure Care Cost Estimate
- Updated CAMU Financial Assurance

If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,



Jason A. Miller
Environmental Scientist

JAM:mll

Attachments

cc: James R. Stenberg, President, Modern Plating Corporation

O:\Modern Plating Corporation\17-112\Final\JAM 17-112 - RCRA Modification Letter.docx



Illinois Environmental Protection Agency

Bureau of Land • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

RCRA Permit Application Form LPC-PA23

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to 1021 North Grand Avenue East between the hours of 8:30 a.m. to 5:00 p.m., Monday through Friday (excluding State holidays).

Please type or print all information legibly.

I. Site Identification

Site # (Illinois EPA): 1770200010 USEPA ID Number: ILD005172325
 Site Name: Modern Plating Corporation
 Physical Site Location (street, road, etc.): 701 S. Hancock Avenue
 City: Freeport Zip Code: 61032 County: Stephenson
 Existing RCRA Permit (if applicable): B-167R-M-8

II. Owner/Operator Identification

Owner Information

Name: Modern Plating Corporation
 Mailing Address:
701 S. Hancock Avenue
PO Box 838
Freeport, IL 61032-0838
 Contact Name: James R Stenberg
 Phone #: 815-235-3111

Operator Information

Name: Modern Plating Corporation
 Mailing Address:
701 S. Hancock Avenue
PO Box 838
Freeport, IL 61032-0838
 Contact Name: James R Stenberg
 Phone #: 815-235-3111

III. Permit Application Identification

Application Type

- New Part B Permit Class 1 Modification
 Part B Permit Renewal Class 1* (prior approval required) Modification
 Class 2 Modification Class 3 Modification
 Additional information to supplement UIC Class I application Log Number

Electronic Filing: Received, Clerk's Office 02/03/2026

Application Type contd.

- Remedial Action Plan Permit (RAPP) Sig RAPP Modification
- Non Sig RAPP Modification Major UIC Modification
- Minor UIC Modification

This Application Involves

- Storage Treatment Disposal Incineration
- Groundwater Corrective Action UIC Class I UIC Class V

Description of This Permit Request: (Include a brief narrative description here.)

Annual requirement (Section II F3) for RCRA permit modification to update the post-closure cost estimate and amount of financial insurance based on 3-year rolling average leachate generation.

IV. **SIGNATURES** Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

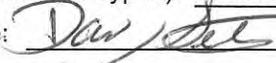
Owner

- 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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

- Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): David Servatius

Owner Signature:  Date: 7/20/17

Title: owner

Operator

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): Modern Plating Corporation c/o James R. Stenberg

Operator Signature:  Date: 7/29/17

Title: President

NOTARY: (Required for both owner and operator signatures)

Subscribe and sworn before me this _____ day of _____, _____.

Notary Signature: _____ Notary Seal:

My commission expires on: _____

Engineer

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Printed or Typed): Richard T. Weegens

Engineer Signature: *Richard T. Weegens*

Illinois License No.: 062-044672

Expiration Date of License: 11/30/2017

Engineer Seal:



Engineer Phone No. 815-235-7643

Engineer Address:
Fehr Graham
221 East Main Street, Suite 200
Freeport, IL 61032

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

CAMU Financial Assurance

Annual Maintenance Cost \$ 26,826

	Years Remaining	Financial Assurance Amount
2018	13	\$ 348,738
2019	12	\$ 321,912
2020	11	\$ 295,086
2021	10	\$ 268,260
2022	9	\$ 241,434
2023	8	\$ 214,608
2024	7	\$ 187,782
2025	6	\$ 160,956
2026	5	\$ 134,130
2027	4	\$ 107,304
2028	3	\$ 80,478
2029	2	\$ 53,652
2030	1	\$ 26,826

**Modern Plating Corporation
Daily CAMU Pumping**

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
2004	1-1-04 through 12-31-04	1849	8477	10326
2005	1-1-05 through 12-31-05	3918	7769	11687
2006	1-1-06 through 12-31-06	1624	3331	4955
2007	9-1-06 through 8-31-07	2383	2987	5370
2008	9-1-07 through 8-31-08	5501	5378	10879
2009	9-1-08 through 8-31-09	2628	3918	6546
2010	9-1-09 through 8-31-10	469	1488	1957
2011	9-1-10 through 8-31-11	0	0	0
2012	9-1-11 through 8-31-12	0	0	0
2013	9-1-12 through 8-31-13	0	0	0
2014	9-1-13 through 8-31-14	0	0	0
2015	9-1-14 through 8-31-15	0	0	0
2016	9-1-15 through 8-31-16	0	0	0
2017	9-1-15 through 6-30-17	0	0	0

Prior 3-year average (2015 through 2017):

0 gallons/year

7/10/2017

Updated Post Closure Care Cost Estimate
For Modern Plating Corporation

RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: ILD005172325

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost. (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,127 each	\$1,127
2.	Land Surface Care <ul style="list-style-type: none"> Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) Snow Plowing (Assume 2 snowfall events) 	1.8 cy 0.2 acres 2 each	\$61.45/cy \$2,663/acre \$205 each	\$111 \$533 \$410
3.	Leachate Treatment ¹	0 ³ gal/yr	\$0.02/gal	\$0.00
4.	Leachate Hauling ²	0 gal/yr	\$0.20/gal	\$0.00
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) Personnel For Sample Collection Preparation & submittal of semi-annual groundwater monitoring report 	2 sample events per yr 2 sample events per yr 2/yr	\$3,301/event \$3,175/event \$3,329/event	\$6,602 \$6,350 \$6,658

7/10/2017

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
	<ul style="list-style-type: none"> • Leachate Detection System (LDS) Monitoring (1 location, 12 times/year) • Leachate Monitoring (no leachate produced) (1 location, 2 times/year) • Preparation & submittal of 5-year minimum GMZ evaluation (includes 5-yr well elevation surveying) • Surface Water Monitoring (2 locations, 2 times/year) 	<p>12 events</p> <p>0 samples</p> <p>1/5 yrs</p> <p>4 samples</p>	<p>\$102/event</p> <p>\$0.00/sample</p> <p>\$5,050</p> <p>\$40.97/sample</p>	<p>\$1,224</p> <p>\$0.00</p> <p>\$1,024</p> <p>\$164</p>
6.	Mowing (2 acres per year)	2 acres	\$92/acre	\$184
7.	Landfill Sump Pump (No leachate being produced and none expected)			
			Subtotal	\$24,387
			Contingency (10%)	\$2,439
			Total Cost per Year	\$26,826

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant
² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site
³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

Certified Mail No.: 7017 0190 0000 2198 5097
Return Receipt Requested

July 20, 2018

Mr. Mark Crites, P.E.
Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
Post Office Box 19276
Springfield, Illinois 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 South Hancock Avenue, Freeport, Illinois 61032
IL ID No: 1770200010
Permit No: B-167R-M-8**

Dear Mr. Crites:

On behalf of Modern Plating Corporation, please find attached the original and three (3) copies of the RCRA Permit Modification request pursuant to Section II.F.3. of the above-referenced RCRA Permit. The annual post closure care cost estimate was increased by the annual inflation factor of 1.7 percent.

As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average. Please update Section II.F.1. and Attachment A of the aforementioned permit accordingly, based on the enclosed data.

The following is included with this submittal:

- RCRA Permit Application Form LPC-PA23
- Updated Leachate Values
- Updated Post Closure Care Cost Estimate
- Updated CAMU Financial Assurance

If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,



Jason A. Miller
Environmental Scientist

JAM:mll

Attachments

cc: James R. Stenberg, President, Modern Plating Corporation

O:\Modern Plating Corporation\18-112\PA Final\18-112 - IEPA - RCRA Modification Letter.docx



Electronic Filing: Received, Clerk's Office 02/03/2026
Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

RCRA Permit Application Form (LPC-PA23)

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to 1021 North Grand Avenue East between the hours of 8:30 a.m. to 5:00 p.m., Monday through Friday (excluding State holidays).

Please type or print all information legibly.

I. Site Identification

Site # (Illinois EPA): 1770200010 USEPA ID Number: ILD005172325
 Site Name: Modern Plating Corporation
 Physical Site Location (street, road, etc.): 701 S Hancock Avenue
 City: Freeport Zip Code: 61032 County: Stephenson
 Existing RCRA Permit (if applicable): B-167R-M-8

II. Owner/Operator Identification

Owner Information

Name: Modern Plating Corporation
 Mailing Address:
 701 S Hancock Avenue
 PO Box 838
 Freeport, IL 61032
 Contact Name: James R Stenberg
 Phone #: 815-235-3111
 Email: _____

Operator Information

Name: Modern Plating Corporation
 Mailing Address:
 701 S Hancock Avenue
 PO Box 838
 Freeport, IL 61032
 Contact Name: James R Stenberg
 Phone #: 815-235-3111
 Email: _____

A 39(i) certification must be submitted for each of the following persons or entities:

- the owner of the business entity applying for the permit;
- the operator of the business entity applying for the permit;
- each officer of the owner or operator, including any officer that signed the permit application;
- each employee of the owner or operator who signed the permit application; and
- any additional owner, operator, or officer or employee of the owner or operator from whom a certification is requested by the Illinois EPA, including any officer or employee who will be responsible for overseeing or implementing regulated activities governed by the permit.

III. Permit Application Identification

Application Type

- New Part B Permit
- Part B Permit Renewal
- Class 1 Modification
- Class 1* (prior approval required) Modification
- Class 2 Modification
- Class 3 Modification
- Additional information to supplement UIC Class I application Log Number
- Remedial Action Plan Permit (RAPP)
- Sig RAPP Modification
- Non Sig RAPP Modification
- Major UIC Modification
- Minor UIC Modification

This Application Involves

- Storage
- Groundwater
- Treatment
- Corrective Action
- Disposal
- UIC Class I
- Incineration
- UIC Class V

Description of This Permit Request: (Include a brief narrative description here.)

Annual requirement (Section II F3) for RCRA permit modification to update the post-closure cost estimate and amount of financial assurance based on 3-year rolling average of leachate generation.

IV. SIGNATURES

Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

Owner

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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

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Owner Name (Printed or Typed): David Servatius

Owner Signature:  Date: 2/23/18

Title: _____

Operator

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): Modern Plating Corporation c/o James R Stenberg

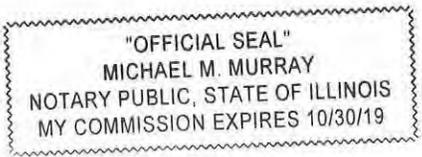
Operator Signature: [Signature] Date: 7-23-18

Title: President

Notary (Required for both owner and operator signatures)

Subscribed and Sworn before me this 23 day of July 2018.

Notary Signature: [Signature]



My commission expires on: October 30, 2019

Notary Seal

Engineer

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Print or Type): Andrew J. Reeter

Engineer Signature: [Signature]

Illinois License No.: 062-061732

Expiration Date of License: 11/30/2019

Engineer Phone No. 815-235-7643

Email: areeter@fehr-graham.com

Engineer Address:
Fehr Graham
221 East Main Street Suite 200
Freeport, IL 61032



Engineer Seal

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

**Modern Plating Corporation
Daily CAMU Pumping**

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
2004	1-1-04 through 12-31-04	1849	8477	10326
2005	1-1-05 through 12-31-05	3918	7769	11687
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2009	9-1-08 through 8-31-09	2628	3918	6546
2010	9-1-09 through 8-31-10	469	1488	1957
2011	9-1-10 through 8-31-11	0	0	0
2012	9-1-11 through 8-31-12	0	0	0
2013	9-1-12 through 8-31-13	0	0	0
2014	9-1-13 through 8-31-14	0	0	0
2015	9-1-14 through 8-31-15	0	0	0
2016	9-1-15 through 8-31-16	0	0	0
2017	9-1-16 through 6-30-17	0	0	0
2018	9-1-17 through 6-30-18	0	0	0

Prior 3-year average (2016 through 2018):

0 gallons/year

7/17/2018

**Updated Post Closure Care Cost Estimate
For Modern Plating Corporation**

RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: ILD005172325

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,146 each	\$1,146
2.	Land Surface Care <ul style="list-style-type: none"> Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) Snow Plowing (Assume 2 snowfall events) 	1.8 cy 0.2 acres 2 each	\$62.49/cy \$2,708/acre \$208 each	\$112 \$542 \$416
3.	Leachate Treatment ¹	0 ³ gal/yr	\$0.02/gal	\$0.00
4.	Leachate Hauling ²	0 gal/yr	\$0.20/gal	\$0.00
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) Personnel For Sample Collection Preparation & submittal of semi-annual groundwater monitoring report 	2 sample events per yr 2 sample events per yr	\$3,357/event \$3,229/event	\$6,714 \$6,458
		2/yr	\$3,386/event	\$6,772

7/17/2018

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
	<ul style="list-style-type: none"> • Leachate Detection System (LDS) Monitoring (1 location, 12 times/year) 	12 events	\$104/event	\$1,248
	<ul style="list-style-type: none"> • Leachate Monitoring (no leachate produced) (1 location, 2 times/year) 	0 samples	\$0.00/sample	\$0.00
	<ul style="list-style-type: none"> • Preparation & submittal of 5-year minimum GMZ evaluation (includes 5-yr well elevation surveying) 	1/5 yrs	\$5,136	\$1,027
	<ul style="list-style-type: none"> • Surface Water Monitoring (2 locations, 2 times/year) 	4 samples	\$41.67/sample	\$167
6.	Mowing (2 acres per year)	2 acres	\$94/acre	\$188
7.	Landfill Sump Pump (No leachate being produced and none expected)			
	Subtotal			\$24,790
	Contingency (10%)			\$2,479
	Total Cost per Year			\$27,269

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site

³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

Certified Mail No: 7019 0140 0000 6059 2839
Return Receipt Requested

July 19, 2019

Mr. Mark Crites, P.E.
Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
Post Office Box 19276
Springfield, Illinois 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 South Hancock Avenue, Freeport, Illinois 61032
IL ID No: 1770200010
Permit No: B-167R-M-10**

Dear Mr. Crites:

On behalf of Modern Plating Corporation, please find attached the original and three (3) copies of the RCRA Permit Modification request pursuant to Section II.F.3. of the above-referenced RCRA Permit. The annual post closure care cost estimate was increased by the annual inflation factor of 2.3 percent.

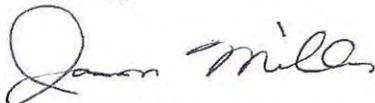
As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average. Please update Section II.F.1. and Attachment A of the aforementioned permit accordingly, based on the enclosed data.

The following is included with this submittal:

- RCRA Permit Application Form LPC-PA23 & 39(i) Certification
- Updated Leachate Values
- Updated Post Closure Care Cost Estimate
- Updated CAMU Financial Assurance

If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,



Jason A. Miller
Environmental Scientist

JAM:apw

Attachments

cc: James R. Stenberg, President, Modern Plating Corporation

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Recycled Paper



Illinois Environmental Protection Agency

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RCRA Permit Application Form (LPC-PA23)

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Please type or print all information legibly.

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Site Name: Modern Plating Corporation

Physical Site Location (street, road, etc.): 701 S Hancock Avenue

City: Freeport Zip Code: 61032 County: Stephenson

Existing RCRA Permit (if applicable): B-167R-M-10

II. Owner/Operator Identification

Owner Information

Name: Modern Plating Corporation

Mailing Address:

701 S Hancock Avenue
PO Box 838
Freeport, IL 61032

Contact Name: James R Stenberg

Phone #: 815-235-3111

Email: _____

Operator Information

Name: Modern Plating Corporation

Mailing Address:

701 S Hancock Avenue
PO Box 838
Freeport, IL 61032

Contact Name: James R Stenberg

Phone #: 815-235-3111

Email: _____

A 39(i) certification must be submitted for each of the following persons or entities:

- the owner of the business entity applying for the permit;
- the operator of the business entity applying for the permit;
- each officer of the owner or operator, including any officer that signed the permit application;
- each employee of the owner or operator who signed the permit application; and
- any additional owner, operator, or officer or employee of the owner or operator from whom a certification is requested by the Illinois EPA, including any officer or employee who will be responsible for overseeing or implementing regulated activities governed by the permit.

III. Permit Application Identification

Application Type

- New Part B Permit
- Part B Permit Renewal
- Class 1 Modification
- Class 1* (prior approval required) Modification
- Class 2 Modification
- Class 3 Modification
- Additional information to supplement UIC Class I application Log Number
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This Application Involves

- Storage
- Groundwater
- Treatment
- Corrective Action
- Disposal
- UIC Class I
- Incineration
- UIC Class V

Description of This Permit Request: (Include a brief narrative description here.)

Annual requirement (Section II F3) for RCRA permit modification to update the post-closure cost estimate and amount of financial assurance based on 3-year rolling average of leachate generation.

IV. SIGNATURES

Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

Owner

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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): David Servatius

Owner Signature:  Date: 7/17/19

Title: _____

Electronic Filing: Received, Clerk's Office 02/03/2026

Operator

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): Modern Plating Corporation c/o James R Stenberg

Operator Signature: _____ Date: 7-17-19

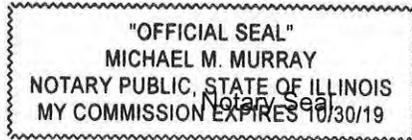
Title: President

Notary (Required for both owner and operator signatures)

Subscribed and Sworn before me this 17 day of July 20 19.

Notary Signature: Michael M. Murray

My commission expires on: 10-30-19



Engineer

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Print or Type): Andrew J. Reeter

Engineer Signature: Andrew J. Reeter

Illinois License No.: 062-061732

Expiration Date of License: 11/30/2019

Engineer Phone No. 815-235-7643

Email: areeter@fehr-graham.com

Engineer Address:

Fehr Graham
221 East Main Street Suite 200
Freeport, IL 61032



Engineer Seal

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))



Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

39(i) Certification for Operating a Waste Management Facility

Pursuant to 415 ILCS 5/39(i), prior to issuing any RCRA permit, or any permit for a waste storage site, sanitary landfill, waste disposal site, waste transfer station, waste treatment facility, waste incinerator, clean construction or demolition debris fill operation, or used tire storage site, the Illinois EPA must conduct an evaluation of the prospective owner's or operator's prior experience in waste management operations, clean construction or demolition debris fill operations, and tire storage site management. As part of that evaluation please complete and submit this form with your permit application.

This form may be completed online and saved locally before printing, signing and submitting it to the Illinois EPA at the address below. If the form is completed manually, please type or print clearly.

Illinois Environmental Protection Agency
Division of Land Pollution Control - #33
39(i) Certification
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

I. Applicant Information

Site Name: Modern Plating Corporation IEPA BOL No.: 1770200010
Site Address: 701 S Hancock Avenue
City: Freeport State: IL Zip Code: 61032
Permit Numbers (if applicable): B-167R-M-10

Owner

Operator

Owner Name: David Servatius Operator Name: Modern Plating Corp c/o James R Stenberg
Street Address: 701 S Hancock Avenue Street Address: 701 S Hancock Avenue
City: Freeport State: IL Zip: 61032 City: Freeport State: IL Zip: 61032

II. Officers and Employees with Site Responsibility

A. Officers: List the name and title of all officers of the owner or operator that will have personal involvement or active participation in the operation or management of the site or facility for which the application is submitted.

Name	Title
James Stenberg	President
David Servatius	Vice President

B. Employees: List the name and title of each employee of the owner or operator that will have personal involvement or active participation in the overall operation or management of the site or facility for which the application is submitted (e.g. site managers, site engineers, and other persons who direct or control the overall day-to-day management of the operation, but not persons whose duties are exclusively limited to equipment operation, labor, or similar non-managerial functions).

Name	Title

III. Owner, Operator, Officer, and Employee Information

A. Prior Conduct Identification

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified under Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and include a copy of each final administrative or judicial determination that required an affirmative response. If the information for each owner, operator, officer, and employee has not changed since the applicant's last submission of a 39(i) certification, the applicant can skip to Section III(C), below.

- 1) Has there been a finding that any person named in Section II violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes No
- 2) Has any person named in Section II ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes No
- 3) Has there been a finding against any person named in Section II of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes No

B. Pending Proceedings

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified in Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and provide information identified in Attachment A regarding the pending proceeding.

- 1. Is there any proceeding currently pending against any person named in Section II that could result in a conviction or finding described in subsection A, above? Yes No
- 2. Is there any proceeding currently pending against any person named in Section II that could result in the reversal of a conviction or finding described in subsection A, above? Yes No

C. Prior Application Information

If (i) the applicant has previously submitted the Attachments required pursuant to subsections A and B above and (ii) the Attachments previously submitted are still complete, true, and correct, then the applicant does not need to include Attachments with this submission if the following box is checked:

By checking this box, I affirm that the Attachments previously submitted are still complete, true, and correct and wish to incorporate them into this Certification.

If the above box is checked, identify the application that contains the previously submitted Attachments that are complete, true, and correct.

Electronic Filing: Received, Clerk's Office 02/03/2026
Authorization for Release of Information

This Certification must be signed by an officer of the applicant.

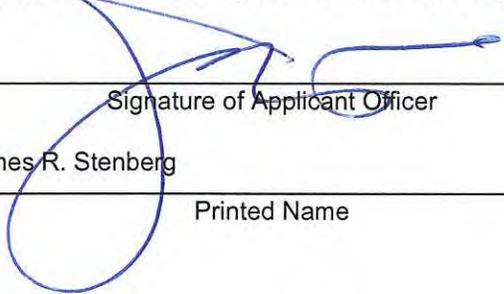
The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by and to a duly authorized agent of the Illinois Environmental Protection Agency, whether the records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records.

The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

Certification Statements

I certify under penalty of law that the information submitted, including information on any Attachments submitted as part of or incorporated into this Certification, 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.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))



Signature of Applicant Officer
James R. Stenberg

Printed Name

7-17-19

Date
President

Title

Updated Post Closure Care Cost Estimate
For Modern Plating Corporation

RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: ILD005172325

Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1. Site Inspections and Report (annual) (1 per year)	1 per year	\$1,172 each	\$1,172
2. Land Surface Care <ul style="list-style-type: none"> <li data-bbox="649 178 730 577">• Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) <li data-bbox="730 178 812 577">• Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) <li data-bbox="812 178 893 577">• Snow Plowing (Assume 2 snowfall events) 	1.8 cy	\$63.93/cy	\$115
	0.2 acres	\$2,770/acre	\$554
	2 each	\$213 each	\$426
3. Leachate Treatment ¹	0 ³ gal/yr	\$0.03/gal	\$0.00
4. Leachate Hauling ²	0 gal/yr	\$0.21/gal	\$0.00
5. Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> <li data-bbox="1299 178 1380 577">• Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) <li data-bbox="1380 178 1461 577">• Personnel For Sample Collection <li data-bbox="1461 178 1542 577">• Preparation & submittal of semi-annual groundwater monitoring report 	2 sample events per yr	\$3,434/event	\$6,868
	2 sample events per yr	\$3,303/event	\$6,606
	2/yr	\$3,464/event	\$6,928

7/16/2019

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
	<ul style="list-style-type: none"> Leachate Detection System (LDS) Monitoring (1 location, 12 times/year) Leachate Monitoring (no leachate produced) (1 location, 2 times/year) Preparation & submittal of 5-year minimum GMZ evaluation (includes 5-yr well elevation surveying) Surface Water Monitoring (2 locations, 2 times/year) 	<p>12 events</p> <p>0 samples</p> <p>1/5 yrs</p> <p>4 samples</p>	<p>\$106/event</p> <p>\$0.00/sample</p> <p>\$5,254</p> <p>\$42.67/sample</p>	<p>\$1,272</p> <p>\$0.00</p> <p>\$1,051</p> <p>\$171</p>
6.	Well Maintenance	1/yr	\$400/yr	\$400
7.	Mowing (2 acres per year)	2 acres	\$96/acre	\$192
8.	Landfill Sump Pump (No leachate being produced and none expected)			
			Subtotal	\$25,755
			Contingency (10%)	\$2,575
			Total Cost per Year	\$28,330

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site

³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

Modern Plating Corporation

CAMU Financial Assurance

Annual Maintenance Cost \$ 28,330

	Years Remaining	Financial Assurance Amount
2020	11	\$ 311,630
2021	10	\$ 283,300
2022	9	\$ 254,970
2023	8	\$ 226,640
2024	7	\$ 198,310
2025	6	\$ 169,980
2026	5	\$ 141,650
2027	4	\$ 113,320
2028	3	\$ 84,990
2029	2	\$ 56,660
2030	1	\$ 28,330

**Modern Plating Corporation
Daily CAMU Pumping**

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
2004	1-1-04 through 12-31-04	1849	8477	10326
2005	1-1-05 through 12-31-05	3918	7769	11687
2006	1-1-06 through 12-31-06	1624	3331	4955
2007	9-1-06 through 8-31-07	2383	2987	5370
2008	9-1-07 through 8-31-08	5501	5378	10879
2009	9-1-08 through 8-31-09	2628	3918	6546
2010	9-1-09 through 8-31-10	469	1488	1957
2011	9-1-10 through 8-31-11	0	0	0
2012	9-1-11 through 8-31-12	0	0	0
2013	9-1-12 through 8-31-13	0	0	0
2014	9-1-13 through 8-31-14	0	0	0
2015	9-1-14 through 8-31-15	0	0	0
2016	9-1-15 through 8-31-16	0	0	0
2017	9-1-16 through 6-30-17	0	0	0
2018	9-1-17 through 6-30-18	0	0	0
2019	9-1-18 through 6-30-19	0	0	0

Prior 3-year average (2017 through 2019):

0 gallons/year

Certified Mail No: 7019 1640 0000 0011 6370
Return Receipt Requested

July 20, 2020

Mr. Mark Crites, P.E.
Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
1021 N. Grand Avenue East
Springfield, Illinois 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 South Hancock Avenue, Freeport, Illinois 61032
IL ID No: 1770200010
Permit No: B-167R-M-10**

Dear Mr. Crites:

On behalf of Modern Plating Corporation, please find attached the original and three (3) copies of the RCRA Permit Modification request pursuant to Section II.F.3. of the above-referenced RCRA Permit. The annual post closure care cost estimate was increased by the annual inflation factor of 1.8 percent.

As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average. Please update Section II.F.1. and Attachment A of the aforementioned permit, accordingly, based on the enclosed data.

The following is included with this submittal:

- RCRA Permit Application Form LPC-PA23 & 39(i) Certification
- Updated Leachate Values
- Updated Post Closure Care Cost Estimate
- Updated CAMU Financial Assurance

If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,



Jason A. Miller
Environmental Scientist

JAM:dep

Attachments

cc: James R. Stenberg, President, Modern Plating Corporation

O:\Modern Plating\20-112 EHS Annual\PH05 General\PA Final\20-112 Modern Plating 2020.07.20 - IEPA - RCRA Modification.docx



Illinois Environmental Protection Agency

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RCRA Permit Application Form (LPC-PA23)

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to 1021 North Grand Avenue East between the hours of 8:30 a.m. to 5:00 p.m., Monday through Friday (excluding State holidays).

Please type or print all information legibly.

I. Site Identification

Site # (Illinois EPA): 1770200010 USEPA ID Number: ILD005172325

Site Name: Modern Plating Corporation

Physical Site Location (street, road, etc.): 701 S Hancock Avenue

City: Freeport Zip Code: 61032 County: Stephenson

Existing RCRA Permit (if applicable): B-167R-M-10

II. Owner/Operator Identification

Owner Information

Name: Modern Plating Corporation

Mailing Address:

701 S Hancock Avenue
PO Box 838
Freeport, IL 61032

Contact Name: James R Stenberg

Phone #: 815-235-3111

Email: _____

Operator Information

Name: Modern Plating Corporation

Mailing Address:

701 S Hancock Avenue
PO Box 838
Freeport, IL 61032

Contact Name: James R Stenberg

Phone #: 815-235-3111

Email: _____

A 39(i) certification must be submitted for each of the following persons or entities:

- the owner of the business entity applying for the permit;
- the operator of the business entity applying for the permit;
- each officer of the owner or operator, including any officer that signed the permit application;
- each employee of the owner or operator who signed the permit application; and
- any additional owner, operator, or officer or employee of the owner or operator from whom a certification is requested by the Illinois EPA, including any officer or employee who will be responsible for overseeing or implementing regulated activities governed by the permit.

III. Permit Application Identification

Application Type

- New Part B Permit
- Part B Permit Renewal
- Class 1 Modification
- Class 1* (prior approval required) Modification
- Class 2 Modification
- Class 3 Modification
- Additional information to supplement UIC Class I application Log Number
- Remedial Action Plan Permit (RAPP)
- Sig RAPP Modification
- Non Sig RAPP Modification
- Major UIC Modification
- Minor UIC Modification

This Application Involves

- Storage
- Groundwater
- Treatment
- Corrective Action
- Disposal
- UIC Class I
- Incineration
- UIC Class V

Description of This Permit Request: (Include a brief narrative description here.)

Annual requirement (Section II F3) for RCRA permit modification to update the post-closure cost estimate and amount of financial assurance based on 3-year rolling average of leachate generation.

IV. SIGNATURES

Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

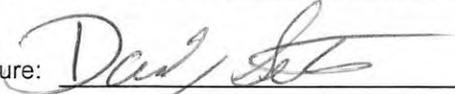
Owner

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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): David Servatius

Owner Signature:  Date: 2/23/2020

Title: owner

Operator

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): Modern Plating Corporation c/o James R Stenberg

Operator Signature: _____ Date: 7-23-20

Title: President

Notary (Required for both owner and operator signatures)

Subscribed and Sworn before me this 23 day of July 20 20.

Notary Signature: Michael M. Murray



My commission expires on: 10-30-2023

Notary Seal

Engineer

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Print or Type): Andrew J. Reeter

Engineer Signature: Andy Reeter 7/20/20

Illinois License No.: 062-061732

Expiration Date of License: 11/30/2021

Engineer Phone No. 815-235-7643

Email: areeter@fehr-graham.com

Engineer Address:

Fehr Graham
221 East Main Street Suite 200
Freeport, IL 61032



All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))



Illinois Environmental Protection Agency

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39(i) Certification for Operating a Waste Management Facility

Pursuant to 415 ILCS 5/39(i), prior to issuing any RCRA permit, or any permit for a waste storage site, sanitary landfill, waste disposal site, waste transfer station, waste treatment facility, waste incinerator, clean construction or demolition debris fill operation, or used tire storage site, the Illinois EPA must conduct an evaluation of the prospective owner's or operator's prior experience in waste management operations, clean construction or demolition debris fill operations, and tire storage site management. As part of that evaluation please complete and submit this form with your permit application.

This form may be completed online and saved locally before printing, signing and submitting it to the Illinois EPA at the address below. If the form is completed manually, please type or print clearly.

Illinois Environmental Protection Agency
Division of Land Pollution Control - #33
39(i) Certification
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

I. Applicant Information

Site Name: Modern Plating Corporation IEPA BOL No.: 1770200010
Site Address: 701 S Hancock Avenue
City: Freeport State: IL Zip Code: 61032
Permit Numbers (if applicable): B-167R-M-10

Owner

Operator

Owner Name: David Servatius Operator Name: Modern Plating Corp c/o James R Stenberg
Street Address: 701 S Hancock Avenue Street Address: 701 S Hancock Avenue
City: Freeport State: IL Zip: 61032 City: Freeport State: IL Zip: 61032

II. Officers and Employees with Site Responsibility

A. Officers: List the name and title of all officers of the owner or operator that will have personal involvement or active participation in the operation or management of the site or facility for which the application is submitted.

Name	Title
James Stenberg	President
David Servatius	Vice President

B. Employees: List the name and title of each employee of the owner or operator that will have personal involvement or active participation in the overall operation or management of the site or facility for which the application is submitted (e.g. site managers, site engineers, and other persons who direct or control the overall day-to-day management of the operation, but not persons whose duties are exclusively limited to equipment operation, labor, or similar non-managerial functions).

Name	Title

Electronic Filing: Received, Clerk's Office 02/03/2026

III. Owner, Operator, Officer, and Employee Information

A. Prior Conduct Identification

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified under Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and include a copy of each final administrative or judicial determination that required an affirmative response. If the information for each owner, operator, officer, and employee has not changed since the applicant's last submission of a 39(i) certification, the applicant can skip to Section III(C), below.

- 1) Has there been a finding that any person named in Section II violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes No
- 2) Has any person named in Section II ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes No
- 3) Has there been a finding against any person named in Section II of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes No

B. Pending Proceedings

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified in Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and provide information identified in Attachment A regarding the pending proceeding.

1. Is there any proceeding currently pending against any person named in Section II that could result in a conviction or finding described in subsection A, above? Yes No
2. Is there any proceeding currently pending against any person named in Section II that could result in the reversal of a conviction or finding described in subsection A, above? Yes No

C. Prior Application Information

If (i) the applicant has previously submitted the Attachments required pursuant to subsections A and B above and (ii) the Attachments previously submitted are still complete, true, and correct, then the applicant does not need to include Attachments with this submission if the following box is checked:

By checking this box, I affirm that the Attachments previously submitted are still complete, true, and correct and wish to incorporate them into this Certification.

If the above box is checked, identify the application that contains the previously submitted Attachments that are complete, true, and correct.

Authorization for Release of Information

This Certification must be signed by an officer of the applicant.

The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by and to a duly authorized agent of the Illinois Environmental Protection Agency, whether the records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records.

The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

Certification Statements

I certify under penalty of law that the information submitted, including information on any Attachments submitted as part of or incorporated into this Certification, 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.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

Signature of Applicant Officer

7-22-2020

Date

James R. Stenberg

Printed Name

President

Title

Electronic Filing: Received, Clerk's Office 02/03/2026
Attachment A (1 of 1)

This Attachment must be completed for each owner or operator, and for each officer or employee identified in Section II, for whom one or more affirmative responses were included in Section III.

Name: _____ Title: _____

Status: Owner Operator Officer Employee (check all that apply)

A. Prior Findings or Convictions

1. Has there been a finding that the person named above violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes
 No
2. Has the person named above ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes
 No
3. Has there been a finding against the person named above of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes
 No

If the answer to any of the above questions is Yes, attach a copy of each final administrative or judicial determination that required an affirmative response.

B. Pending Proceedings

Is there any proceeding currently pending that could result in one of the following:

1. A conviction or finding described in subsection A, above? Yes
 No
2. The reversal of a conviction or finding described in subsection A, above? Yes
 No

If the answer to any of the above questions is Yes, please provide information about the pending proceeding, including the parties involved, the adjudicating body, the docket number, the nature of the proceeding, and the status. The box below will expand as needed. Attach additional sheets if necessary.

**Modern Plating Corporation
Daily CAMU Pumping**

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
2004	1-1-04 through 12-31-04	1849	8477	10326
2005	1-1-05 through 12-31-05	3918	7769	11687
2006	1-1-06 through 12-31-06	1624	3331	4955
2007	9-1-06 through 8-31-07	2383	2987	5370
2008	9-1-07 through 8-31-08	5501	5378	10879
2009	9-1-08 through 8-31-09	2628	3918	6546
2010	9-1-09 through 8-31-10	469	1488	1957
2011	9-1-10 through 8-31-11	0	0	0
2012	9-1-11 through 8-31-12	0	0	0
2013	9-1-12 through 8-31-13	0	0	0
2014	9-1-13 through 8-31-14	0	0	0
2015	9-1-14 through 8-31-15	0	0	0
2016	9-1-15 through 8-31-16	0	0	0
2017	9-1-16 through 6-30-17	0	0	0
2018	9-1-17 through 6-30-18	0	0	0
2019	9-1-18 through 6-30-19	0	0	0
2020	9-1-19 through 6-30-20	0	0	0

Prior 3-year average (2018 through 2020):

0 gallons/year

7/20/2020

Updated Post Closure Care Cost Estimate
For Modern Plating Corporation

RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: ILD005172325

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,193 each	\$1,193
2.	Land Surface Care <ul style="list-style-type: none"> Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) Snow Plowing (Assume 2 snowfall events) 	1.8 cy 0.2 acres 2 each	\$65.08/cy \$2,820/acre \$217 each	\$117 \$564 \$434
3.	Leachate Treatment ¹	0 ³ gal/yr	\$0.03/gal	\$0.00
4.	Leachate Hauling ²	0 gal/yr	\$0.21/gal	\$0.00
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) Personnel For Sample Collection Preparation & submittal of semi-annual groundwater monitoring report 	2 sample events per yr 2 sample events per yr	\$3,496/event \$3,362/event	\$6,992 \$6,724 \$7,052

7/20/2020

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
	<ul style="list-style-type: none"> • Leachate Detection System (LDS) Monitoring (1 location, 12 times/year) 	12 events	\$108/event	\$1,296
	<ul style="list-style-type: none"> • Leachate Monitoring (no leachate produced) (1 location, 2 times/year) 	0 samples	\$0.00/sample	\$0.00
	<ul style="list-style-type: none"> • Preparation & submittal of 5-year minimum GMZ evaluation (includes 5-yr well elevation surveying) 	1/5 yrs	\$5,349	\$1,070
	<ul style="list-style-type: none"> • Surface Water Monitoring (2 locations, 2 times/year) 	4 samples	\$43.67/sample	\$175
6.	Well Maintenance	1/yr	\$407/yr	\$407
7.	Mowing (2 acres per year)	2 acres	\$98/acre	\$196
8.	Landfill Sump Pump (No leachate being produced and none expected)			
			Subtotal	\$26,220
			Contingency (10%)	\$2,622
			Total Cost per Year	\$28,840

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant
² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site
³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

Modern Plating Corporation

CAMU Financial Assurance

Annual Maintenance Cost \$ 28,840

	Years Remaining	Financial Assurance Amount
2021	10	\$ 288,400
2022	9	\$ 259,560
2023	8	\$ 230,720
2024	7	\$ 201,880
2025	6	\$ 173,040
2026	5	\$ 144,200
2027	4	\$ 115,360
2028	3	\$ 86,520
2029	2	\$ 57,680
2030	1	\$ 28,840

Certified Mail No. 7020 0090 0001 2921 3516

Return Receipt Requested

July 12, 2021

Mr. Mark Crites, P.E.
Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
1021 N. Grand Avenue East
Springfield, Illinois 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 South Hancock Avenue, Freeport, Illinois 61032
IL ID No: 1770200010
Permit No: B-167R-M-12**

Dear Mr. Crites:

On behalf of Modern Plating Corporation, please find attached the original and three (3) copies of the RCRA Permit Modification request pursuant to Section II.F.3. of the above-referenced RCRA Permit. The annual post closure care cost estimate was increased by the annual inflation factor of 1.012 percent.

As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average. Please update Section II.F.1. and Attachment A of the aforementioned permit, accordingly, based on the enclosed data.

The following is included with this submittal:

- RCRA Permit Application Form LPC-PA23 & 39(i) Certification
- Updated Leachate Values
- Updated Post Closure Care Cost Estimate
- Updated CAMU Financial Assurance

If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,



Jason A. Miller
Environmental Scientist

JAM:dep

Attachments

cc: James R. Stenberg, President, Modern Plating Corporation (Electronic email only)

O:\Modern Plating\21-112 EHS Annual\PA Final\21-112 Modern Plating 2021.07.12 - IEPA - RCRA Modification.docx



Electronic Filing: Received, Clerk's Office 02/03/2026
Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

**39(i) Certification
 for Operating a Waste Management Facility**

Pursuant to 415 ILCS 5/39(i), prior to issuing any RCRA permit, or any permit for a waste storage site, sanitary landfill, waste disposal site, waste transfer station, waste treatment facility, waste incinerator, clean construction or demolition debris fill operation, or used tire storage site, the Illinois EPA must conduct an evaluation of the prospective owner's or operator's prior experience in waste management operations, clean construction or demolition debris fill operations, and tire storage site management. As part of that evaluation please complete and submit this form with your permit application.

This form may be completed online and saved locally before printing, signing and submitting it to the Illinois EPA at the address below. If the form is completed manually, please type or print clearly.

Illinois Environmental Protection Agency
 Division of Land Pollution Control - #33
 39(i) Certification
 1021 North Grand Avenue East
 P.O. Box 19276
 Springfield, IL 62794-9276

I. Applicant Information

Site Name: Modern Plating Corporation IEPA BOL No.: 1770200010
 Site Address: 701 S Hancock Avenue
 City: Freeport State: IL Zip Code: 61032
 Permit Numbers (if applicable): B-167R-M-12

Owner

Owner Name: David Servatius
 Street Address: 701 S Hancock Avenue
 City: Freeport State: IL Zip: 61032

Operator

Operator Name: Modern Plating Corp c/o James R Stenberg
 Street Address: 701 S Hancock Avenue
 City: Freeport State: IL Zip: 61032

II. Officers and Employees with Site Responsibility

A. Officers: List the name and title of all officers of the owner or operator that will have personal involvement or active participation in the operation or management of the site or facility for which the application is submitted.

Name	Title
James Stenberg	President
David Servatius	Vice President

B. Employees: List the name and title of each employee of the owner or operator that will have personal involvement or active participation in the overall operation or management of the site or facility for which the application is submitted (e.g. site managers, site engineers, and other persons who direct or control the overall day-to-day management of the operation, but not persons whose duties are exclusively limited to equipment operation, labor, or similar non-managerial functions).

Name	Title

III. Owner, Operator, Officer, and Employee Information

A. Prior Conduct Identification

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified under Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and include a copy of each final administrative or judicial determination that required an affirmative response. If the information for each owner, operator, officer, and employee has not changed since the applicant's last submission of a 39(i) certification, the applicant can skip to Section III(C), below.

- 1) Has there been a finding that any person named in Section II violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes
 No
- 2) Has any person named in Section II ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes
 No
- 3) Has there been a finding against any person named in Section II of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes
 No

B. Pending Proceedings

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified in Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and provide information identified in Attachment A regarding the pending proceeding.

- 1. Is there any proceeding currently pending against any person named in Section II that could result in a conviction or finding described in subsection A, above? Yes
 No
- 2. Is there any proceeding currently pending against any person named in Section II that could result in the reversal of a conviction or finding described in subsection A, above? Yes
 No

C. Prior Application Information

If (i) the applicant has previously submitted the Attachments required pursuant to subsections A and B above and (ii) the Attachments previously submitted are still complete, true, and correct, then the applicant does not need to include Attachments with this submission if the following box is checked:

By checking this box, I affirm that the Attachments previously submitted are still complete, true, and correct and wish to incorporate them into this Certification.

If the above box is checked, identify the application that contains the previously submitted Attachments that are complete, true, and correct.

This Certification must be signed by an officer of the applicant.

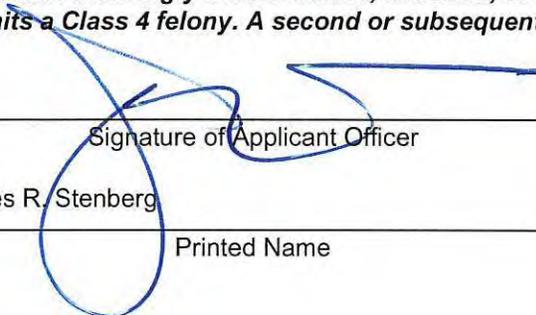
The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by and to a duly authorized agent of the Illinois Environmental Protection Agency, whether the records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records.

The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

Certification Statements

I certify under penalty of law that the information submitted, including information on any Attachments submitted as part of or incorporated into this Certification, 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.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))



Signature of Applicant Officer

James R. Stenberg

Printed Name

7-12-21

Date

President

Title

This Attachment must be completed for each owner or operator, and for each officer or employee identified in Section II, for whom one or more affirmative responses were included in Section III.

Name: _____ Title: _____

Status: Owner Operator Officer Employee (check all that apply)

A. Prior Findings or Convictions

1. Has there been a finding that the person named above violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes No
2. Has the person named above ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes No
3. Has there been a finding against the person named above of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes No

If the answer to any of the above questions is Yes, attach a copy of each final administrative or judicial determination that required an affirmative response.

B. Pending Proceedings

Is there any proceeding currently pending that could result in one of the following:

1. A conviction or finding described in subsection A, above? Yes No
2. The reversal of a conviction or finding described in subsection A, above? Yes No

If the answer to any of the above questions is Yes, please provide information about the pending proceeding, including the parties involved, the adjudicating body, the docket number, the nature of the proceeding, and the status. The box below will expand as needed. Attach additional sheets if necessary.



Electronic Filing: Received, Clerk's Office 02/03/2026
Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

RCRA Permit Application Form (LPC-PA23)

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to 1021 North Grand Avenue East between the hours of 8:30 a.m. to 5:00 p.m., Monday through Friday (excluding State holidays).

Please type or print all information legibly.

I. Site Identification

Site # (Illinois EPA): 1770200010 USEPA ID Number: ILD005172325
 Site Name: Modern Plating Corporation
 Physical Site Location (street, road, etc.): 701 S. Hancock Avenue
 City: Freeport Zip Code: 61032 County: Stephenson
 Existing RCRA Permit (if applicable): B-167R-M-12

II. Owner/Operator Identification

Owner Information

Name: Modern Plating Corporation
 Mailing Address:
 701 S. Hancock Avenue
 PO Box 838
 Freeport, IL 61032
 Contact Name: James R Stenberg
 Phone #: 815-235-3111
 Email: _____

Operator Information

Name: Modern Plating Corporation
 Mailing Address:
 701 S. Hancock Avenue
 PO Box 838
 Freeport, IL 61032
 Contact Name: James R Stenberg
 Phone #: 815-235-3111
 Email: _____

A 39(i) certification must be submitted with information concerning the following persons or entities:

- the owner of the business entity applying for the permit;
- the operator of the business entity applying for the permit;
- each employee or officer of the owner or operator who signed the permit application or has managerial authority at the site; and
- any additional owner, operator, or officer or employee of the owner or operator from whom a certification is requested by the Illinois EPA, including any officer or employee who will be responsible for overseeing or implementing regulated activities governed by the permit.

III. Permit Application Identification

Application Type

- New Part B Permit
- Part B Permit Renewal
- Class 1 Modification
- Class 1* (prior approval required) Modification
- Class 2 Modification
- Class 3 Modification
- Additional information to supplement UIC Class I application Log Number
- Remedial Action Plan Permit (RAPP)
- Sig RAPP Modification
- Non Sig RAPP Modification
- Major UIC Modification
- Minor UIC Modification

This Application Involves

- Storage
- Groundwater
- Treatment
- Corrective Action
- Disposal
- UIC Class I
- Incineration
- UIC Class V

Description of This Permit Request: (Include a brief narrative description here.)

Annual requirement (Section II F3) For RCRA permit modification to update the post-closure cost estimate and amount of financial assurance based pm 3-year rolling average of leachate generation.

IV. SIGNATURES

Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

Owner

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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): David Servatius

Owner Signature:  Date: 7/12/2021
 Title: Vice President

Operator

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): Modern Plating Corporation c/o James R. Stenberg

Operator Signature: _____ Date: 7-12-21

Title: President

Notary (Required for both owner and operator signatures)

Subscribed and Sworn before me this 12 day of July 2021.

Notary Signature: Dawn E Pontius

My commission expires on: 9/19/21



Engineer

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Print or Type): Andrew J. Reeter

Engineer Signature: Andy Reeter

Illinois License No.: 062-061732

Expiration Date of License: 11/30/2021

Engineer Phone No. 815-235-7643

Email: areeter@fehr-graham.com

Engineer Address:

Fehr Graham
101 West Stephenson Street
Freeport, IL 61032



Engineer Seal

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

CAMU Financial Assurance

Annual Maintenance Cost \$ 29,131

	Years Remaining	Financial Assurance Amount
2022	9	\$ 262,179
2023	8	\$ 233,048
2024	7	\$ 203,917
2025	6	\$ 174,786
2026	5	\$ 145,655
2027	4	\$ 116,524
2028	3	\$ 87,393
2029	2	\$ 58,262
2030	1	\$ 29,131

7/8/2021

Updated Post Closure Care Cost Estimate
For Modern Plating Corporation

RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: ILD005172325

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,205 each	\$1,205
2.	Land Surface Care <ul style="list-style-type: none"> Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) Snow Plowing (Assume 2 snowfall events) 	1.8 cy 0.2 acres 2 each	\$65.74/cy \$2,849/acre \$219 each	\$118 \$570 \$438
3.	Leachate Treatment ¹	0 ³ gal/yr	\$0.04/gal	\$0.00
4.	Leachate Hauling ²	0 gal/yr	\$0.22/gal	\$0.00
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) Personnel For Sample Collection Preparation & submittal of semi-annual groundwater monitoring report 	2 sample events per yr 2 sample events per yr 2/yr	\$3,531/event \$3,396/event \$3,562/event	\$7,062 \$6,792 \$7,124

7/8/2021

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
	<ul style="list-style-type: none"> Leachate Detection System (LDS) Monitoring (1 location, 12 times/year) Leachate Monitoring (no leachate produced) (1 location, 2 times/year) Preparation & submittal of 5-year minimum GMZ evaluation (includes 5-yr well elevation surveying) Surface Water Monitoring (2 locations, 2 times/year) 	<p>12 events</p> <p>0 samples</p> <p>1/5 yrs</p> <p>4 samples</p>	<p>\$109/event</p> <p>\$0.00/sample</p> <p>\$5,403</p> <p>\$44.11/sample</p>	<p>\$1,308</p> <p>\$0.00</p> <p>\$1,081</p> <p>\$176</p>
6.	Well Maintenance	1/yr	\$411/yr	\$411
7.	Mowing (2 acres per year)	2 acres	\$99/acre	\$198
8.	Landfill Sump Pump (No leachate being produced and none expected)			
			Subtotal	\$26,483
			Contingency (10%)	\$2,648
			Total Cost per Year	\$29,131

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site

³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

**Modern Plating Corporation
Daily CAMU Pumping**

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
2004	1-1-04 through 12-31-04	1849	8477	10326
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2011	9-1-10 through 8-31-11	0	0	0
2012	9-1-11 through 8-31-12	0	0	0
2013	9-1-12 through 8-31-13	0	0	0
2014	9-1-13 through 8-31-14	0	0	0
2015	9-1-14 through 8-31-15	0	0	0
2016	9-1-15 through 8-31-16	0	0	0
2017	9-1-16 through 6-30-17	0	0	0
2018	9-1-17 through 6-30-18	0	0	0
2019	9-1-18 through 6-30-19	0	0	0
2020	9-1-19 through 6-30-20	0	0	0
2021	9-1-20 through 6-30-21	0	0	0

Prior 3-year average (2019 through 2021):

0 gallons/year



UPS: 1Z 651 395 03 5521 0656

July 18, 2022

Mr. Mark Crites, P.E.
Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
1021 N. Grand Avenue East
Springfield, Illinois 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 South Hancock Avenue, Freeport, Illinois 61032
IL ID No: 1770200010
Permit No: B-167R-M-12**

Dear Mr. Crites:

On behalf of Modern Plating Corporation, **please find attached the original and three (3) copies** of the RCRA Permit Modification request pursuant to Section II.F.3. of the above-referenced RCRA Permit. The annual post closure care cost estimate was increased by the annual inflation factor of 4.1 percent.

As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average. Please update Section II.F.1. and Attachment A of the aforementioned permit, accordingly, based on the enclosed data.

The following is included with this submittal:

- RCRA Permit Application Form LPC-PA23 & 39(i) Certification
- Updated Leachate Values
- Updated Post Closure Care Cost Estimate
- Updated CAMU Financial Assurance

If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink that reads "Jason Miller". The signature is written in a cursive style.

Jason A. Miller
Environmental Scientist

JAM:dep

Attachments

cc: Brandon Smith, President, Modern Plating Corporation (Electronic email only)

O:\Modern Plating\22-112 EHS Annual\PA Final\22-112 Modern Plating 2022.07.18 - IEPA RCRA Modification.docx

Attachment 1

RCRA Permit Application

Form LPC-PA23 & 39(i) Certification



Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

RCRA Permit Application Form (LPC-PA23)

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to 1021 North Grand Avenue East between the hours of 8:30 a.m. to 5:00 p.m., Monday through Friday (excluding State holidays).

Please type or print all information legibly.

I. Site Identification

Site # (Illinois EPA): 1770200010 USEPA ID Number: ILD005172325

Site Name: Modern Plating Corporation

Physical Site Location (street, road, etc.): 701 S Hancock Avenue

City: Freeport Zip Code: 61032 County: Stephenson

Existing RCRA Permit (if applicable): B-167R-M-12

II. Owner/Operator Identification

Owner Information

Name: Modern Plating Corporation

Mailing Address:

701 S Hancock Avenue
PO Box 838
Freeport, IL 61032

Contact Name: Brandon Smith

Phone #: 815-235-3111

Email: _____

Operator Information

Name: Modern Plating Corporation

Mailing Address:

701 S Hancock Avenue
PO Box 838
Freeport, IL 61032

Contact Name: Brandon Smith

Phone #: 815-235-3111

Email: _____

A 39(i) certification must be submitted for each of the following persons or entities:

- the owner of the business entity applying for the permit;
- the operator of the business entity applying for the permit;
- each officer of the owner or operator, including any officer that signed the permit application;
- each employee of the owner or operator who signed the permit application; and
- any additional owner, operator, or officer or employee of the owner or operator from whom a certification is requested by the Illinois EPA, including any officer or employee who will be responsible for overseeing or implementing regulated activities governed by the permit.

III. Permit Application Identification

Application Type

- New Part B Permit
- Part B Permit Renewal
- Class 1 Modification
- Class 1* (prior approval required) Modification
- Class 2 Modification
- Class 3 Modification
- Additional information to supplement UIC Class I application Log Number
- Remedial Action Plan Permit (RAPP)
- Sig RAPP Modification
- Non Sig RAPP Modification
- Major UIC Modification
- Minor UIC Modification

This Application Involves

- Storage
- Treatment
- Disposal
- Incineration
- Groundwater
- Corrective Action
- UIC Class I
- UIC Class V

Description of This Permit Request: (Include a brief narrative description here.)

Annual requirement (Section II F3) for RCRA permit modification to update the post-closure cost estimate and amount of financial assurance based on 3-year rolling average of leachate generation.

IV. SIGNATURES

Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

Owner

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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): David Servatius

Owner Signature:  Date: 7/29/22

Title: owner

Operator

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): Modern Plating Corporation c/o Brandon Smith

Operator Signature:  Date: 7/29/22

Title: President

Notary (Required for both owner and operator signatures)

Subscribed and Sworn before me this 29 day of July 2022.

Notary Signature: 

My commission expires on: 10-30-2023



Notary Seal

Engineer

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Print or Type): Andrew J. Reeter

Engineer Signature: 

Illinois License No.: 062-061732

Expiration Date of License: 11/30/2023

Engineer Phone No. 815-235-7643

Email: areeter@fehrgraham.com

Engineer Address:

Fehr Graham
101 West Stephenson Street
Freeport, IL 61032



Engineer Seal

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))



Electronic Filing: Received, Clerk's Office 02/03/2026
Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

**39(i) Certification
 for Operating a Waste Management Facility**

Pursuant to 415 ILCS 5/39(i), prior to issuing any RCRA permit, or any permit for a waste storage site, sanitary landfill, waste disposal site, waste transfer station, waste treatment facility, waste incinerator, clean construction or demolition debris fill operation, or used tire storage site, the Illinois EPA must conduct an evaluation of the prospective owner's or operator's prior experience in waste management operations, clean construction or demolition debris fill operations, and tire storage site management. As part of that evaluation please complete and submit this form with your permit application.

This form may be completed online and saved locally before printing, signing and submitting it to the Illinois EPA at the address below. If the form is completed manually, please type or print clearly.

Illinois Environmental Protection Agency
 Division of Land Pollution Control - #33
 39(i) Certification
 1021 North Grand Avenue East
 P.O. Box 19276
 Springfield, IL 62794-9276

I. Applicant Information

Site Name: Modern Plating Corporation IEPA BOL No.: 1770200010
 Site Address: 701 S Hancock Avenue
 City: Freeport State: IL Zip Code: 61032
 Permit Numbers (if applicable): B-167R-M-12

Owner

Owner Name: David Servatius
 Street Address: 701 S Hancock Avenue
 City: Freeport State: IL Zip: 61032

Operator

Operator Name: Modern Plating Corp c/o Brandon Smith
 Street Address: 701 S Hancock Avenue
 City: Freeport State: IL Zip: 61032

II. Officers and Employees with Site Responsibility

A. Officers: List the name and title of all officers of the owner or operator that will have personal involvement or active participation in the operation or management of the site or facility for which the application is submitted.

Name	Title
Brandon Smith	President
David Servatius	Vice President

B. Employees: List the name and title of each employee of the owner or operator that will have personal involvement or active participation in the overall operation or management of the site or facility for which the application is submitted (e.g. site managers, site engineers, and other persons who direct or control the overall day-to-day management of the operation, but not persons whose duties are exclusively limited to equipment operation, labor, or similar non-managerial functions).

Name	Title

III. Owner, Operator, Officer, and Employee Information

A. Prior Conduct Identification

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified under Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and include a copy of each final administrative or judicial determination that required an affirmative response. If the information for each owner, operator, officer, and employee has not changed since the applicant's last submission of a 39(i) certification, the applicant can skip to Section III(C), below.

- 1) Has there been a finding that any person named in Section II violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes
 No
- 2) Has any person named in Section II ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes
 No
- 3) Has there been a finding against any person named in Section II of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes
 No

B. Pending Proceedings

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified in Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and provide information identified in Attachment A regarding the pending proceeding.

- 1. Is there any proceeding currently pending against any person named in Section II that could result in a conviction or finding described in subsection A, above? Yes
 No
- 2. Is there any proceeding currently pending against any person named in Section II that could result in the reversal of a conviction or finding described in subsection A, above? Yes
 No

C. Prior Application Information

If (i) the applicant has previously submitted the Attachments required pursuant to subsections A and B above and (ii) the Attachments previously submitted are still complete, true, and correct, then the applicant does not need to include Attachments with this submission if the following box is checked:

By checking this box, I affirm that the Attachments previously submitted are still complete, true, and correct and wish to incorporate them into this Certification.

If the above box is checked, identify the application that contains the previously submitted Attachments that are complete, true, and correct.

Authorization for Release of Information

This Certification must be signed by an officer of the applicant.

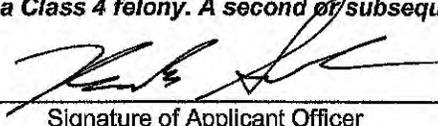
The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by and to a duly authorized agent of the Illinois Environmental Protection Agency, whether the records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records.

The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

Certification Statements

I certify under penalty of law that the information submitted, including information on any Attachments submitted as part of or incorporated into this Certification, 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.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))



Signature of Applicant Officer

7/29/22

Date

Brandon Smith

Printed Name

President

Title

This Attachment must be completed for each owner or operator, and for each officer or employee identified in Section II, for whom one or more affirmative responses were included in Section III.

Name: _____ Title: _____

Status: Owner Operator Officer Employee (check all that apply)

A. Prior Findings or Convictions

1. Has there been a finding that the person named above violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes No
2. Has the person named above ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes No
3. Has there been a finding against the person named above of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes No

If the answer to any of the above questions is Yes, attach a copy of each final administrative or judicial determination that required an affirmative response.

B. Pending Proceedings

Is there any proceeding currently pending that could result in one of the following:

1. A conviction or finding described in subsection A, above? Yes No
2. The reversal of a conviction or finding described in subsection A, above? Yes No

If the answer to any of the above questions is Yes, please provide information about the pending proceeding, including the parties involved, the adjudicating body, the docket number, the nature of the proceeding, and the status. The box below will expand as needed. Attach additional sheets if necessary.

Attachment 2

Updated Leachate Values

**Modern Plating Corporation
Daily CAMU Pumping**

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
2004	1-1-04 through 12-31-04	1849	8477	10326
2005	1-1-05 through 12-31-05	3918	7769	11687
2006	1-1-06 through 12-31-06	1624	3331	4955
2007	9-1-06 through 8-31-07	2383	2987	5370
2008	9-1-07 through 8-31-08	5501	5378	10879
2009	9-1-08 through 8-31-09	2628	3918	6546
2010	9-1-09 through 8-31-10	469	1488	1957
2011	9-1-10 through 8-31-11	0	0	0
2012	9-1-11 through 8-31-12	0	0	0
2013	9-1-12 through 8-31-13	0	0	0
2014	9-1-13 through 8-31-14	0	0	0
2015	9-1-14 through 8-31-15	0	0	0
2016	9-1-15 through 8-31-16	0	0	0
2017	9-1-16 through 6-30-17	0	0	0
2018	9-1-17 through 6-30-18	0	0	0
2019	9-1-18 through 6-30-19	0	0	0
2020	9-1-19 through 6-30-20	0	0	0
2021	9-1-20 through 6-30-21	0	0	0
2022	9-1-21 through 6-30-22	0	0	0

Prior 3-year average (2020 through 2022):

0 gallons/year

Attachment 3

Updated Post Closure Care Cost Estimate

7/18/2022

**Updated Post Closure Care Cost Estimate
For Modern Plating Corporation**

**RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: ILD005172325**

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,254 each	\$1,254
2.	Land Surface Care <ul style="list-style-type: none"> • Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) • Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) • Snow Plowing (Assume 2 snowfall events) 	1.8 cy 0.2 acres 2 each	\$68.44/cy \$2,966/acre \$228 each	\$123 \$593 \$456
3.	Leachate Treatment ¹	0 ³ gal/yr	\$0.04/gal	\$0.00
4.	Leachate Hauling ²	0 gal/yr	\$0.23/gal	\$0.00
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> • Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) • Personnel For Sample Collection • Preparation & submittal of semi-annual groundwater monitoring report 	2 sample events per yr 2 sample events per yr 2/yr	\$3,376/event \$3,535/event \$3,708/event	\$7,352 \$7,070 \$7,416

7/18/2022

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
	<ul style="list-style-type: none"> • Leachate Detection System (LDS) Monitoring (1 location, 12 times/year) • Leachate Monitoring (no leachate produced) (1 location, 2 times/year) • Preparation & submittal of 5-year minimum GMZ evaluation (includes 5-yr well elevation surveying) • Surface Water Monitoring (2 locations, 2 times/year) 	<p>12 events</p> <p>0 samples</p> <p>1/5 yrs</p> <p>4 samples</p>	<p>\$113/event</p> <p>\$0.00/sample</p> <p>\$5,625</p> <p>\$45.92/sample</p>	<p>\$1,356</p> <p>\$0.00</p> <p>\$1,125</p> <p>\$184</p>
6.	Well Maintenance	1/yr	\$428/yr	\$428
7.	Mowing (2 acres per year)	2 acres	\$103/acre	\$206
8.	Landfill Sump Pump (No leachate being produced and none expected)			
		Subtotal		\$27,563
			Contingency (10%)	\$2,756
			Total Cost per Year	\$30,319

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site

³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

Attachment 4

Updated CAMU Financial Assurance

Electronic Filing: Received, Clerk's Office 02/03/2026
Modern Plating Corporation

CAMU Financial Assurance

Annual Maintenance Cost \$ 30,319

	Years Remaining	Financial Assurance Amount
2023	8	\$ 242,552
2024	7	\$ 212,233
2025	6	\$ 181,914
2026	5	\$ 151,595
2027	4	\$ 121,276
2028	3	\$ 90,957
2029	2	\$ 60,638
2030	1	\$ 30,319



FedEX No.: 7728 1605 6517

July 24, 2023

Mr. Mark Crites, P.E.
Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
1021 N. Grand Avenue East
Springfield, Illinois 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 South Hancock Avenue, Freeport, Illinois 61032
IL ID No: 1770200010
Permit No: B-167R-M-12**

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If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink that reads 'Jason Miller'.

Jason A. Miller, CHMM
Project EHS Scientist

JAM:dep

Attachments

cc: Brandon Smith, President, Modern Plating Corporation (Electronic email only)

O:\Modern Plating\23-112 EHS Annual\PA Final\23-112 Modern Plating 2023.07.18 - IEPA RCRA Modification.docx

Attachment 1

RCRA Permit Application

Form LPC-PA23 & 39(i) Certification



Electronic Filing: Received, Clerk's Office 02/03/2026
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Name: Modern Plating Corporation
 Mailing Address:
 701 S Hancock Avenue
 PO Box 838
 Freeport, IL 61032
 Contact Name: Brandon Smith
 Phone #: 815-235-3111
 Email: _____

Operator Information

Name: Modern Plating Corporation
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 PO Box 838
 Freeport, IL 61032
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 Phone #: 815-235-3111
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- the operator of the business entity applying for the permit;
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- Corrective Action
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Description of This Permit Request: (Include a brief narrative description here.)

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Please check the box of the appropriate certification.

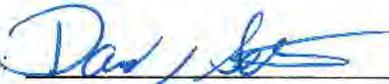
Owner

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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): David Servatius

Owner Signature:  Date: 7/24/23

Title: owner

Operator

Electronic Filing: Received, Clerk's Office 02/03/2026

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): Modern Plating Corporation c/o Brandon Smith

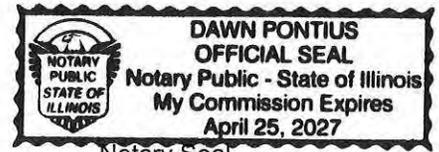
Operator Signature: *[Signature]* Date: 7/24/23

Title: President

Notary (Required for both owner and operator signatures)

Subscribed and Sworn before me this 24th day of July 2023.

Notary Signature: *[Signature]*



My commission expires on: 4/25/2027

Engineer

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Print or Type): Andrew J. Reeter

Engineer Signature: *[Signature]*

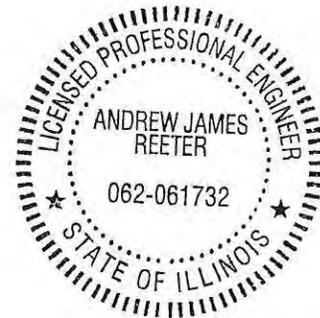
Illinois License No.: 062-061732

Expiration Date of License: 11/30/2023

Engineer Phone No. 815-235-7643

Email: areeter@fehrgraham.com

Engineer Address:
Fehr Graham
101 West Stephenson Street
Freeport, IL 61032



Engineer Seal

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))



Electronic Filing: Received, Clerk's Office 02/03/2026
Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

**39(i) Certification
 for Operating a Waste Management Facility**

Pursuant to 415 ILCS 5/39(i), prior to issuing any RCRA permit, or any permit for a waste storage site, sanitary landfill, waste disposal site, waste transfer station, waste treatment facility, waste incinerator, clean construction or demolition debris fill operation, or used tire storage site, the Illinois EPA must conduct an evaluation of the prospective owner's or operator's prior experience in waste management operations, clean construction or demolition debris fill operations, and tire storage site management. As part of that evaluation please complete and submit this form with your permit application.

This form may be completed online and saved locally before printing, signing and submitting it to the Illinois EPA at the address below. If the form is completed manually, please type or print clearly.

Illinois Environmental Protection Agency
 Division of Land Pollution Control - #33
 39(i) Certification
 1021 North Grand Avenue East
 P.O. Box 19276
 Springfield, IL 62794-9276

I. Applicant Information

Site Name: Modern Plating Corporation IEPA BOL No.: 1770200010
 Site Address: 701 S Hancock Avenue
 City: Freeport State: IL Zip Code: 61032
 Permit Numbers (if applicable): B-167R-M-12

Owner

Operator

Owner Name: David Servatius Operator Name: Modern Plating Corp c/o Brandon Smith
 Street Address: 701 S Hancock Avenue Street Address: 701 S Hancock Avenue
 City: Freeport State: IL Zip: 61032 City: Freeport State: IL Zip: 61032

II. Officers and Employees with Site Responsibility

A. Officers: List the name and title of all officers of the owner or operator that will have personal involvement or active participation in the operation or management of the site or facility for which the application is submitted.

Name	Title
Brandon Smith	President
David Servatius	Vice President

B. Employees: List the name and title of each employee of the owner or operator that will have personal involvement or active participation in the overall operation or management of the site or facility for which the application is submitted (e.g. site managers, site engineers, and other persons who direct or control the overall day-to-day management of the operation, but not persons whose duties are exclusively limited to equipment operation, labor, or similar non-managerial functions).

Name	Title

III. Owner, Operator, Officer, and Employee Information

A. Prior Conduct Identification

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified under Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and include a copy of each final administrative or judicial determination that required an affirmative response. If the information for each owner, operator, officer, and employee has not changed since the applicant's last submission of a 39(i) certification, the applicant can skip to Section III(C), below.

- 1) Has there been a finding that any person named in Section II violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes
 No
- 2) Has any person named in Section II ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes
 No
- 3) Has there been a finding against any person named in Section II of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes
 No

B. Pending Proceedings

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified in Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and provide information identified in Attachment A regarding the pending proceeding.

- 1. Is there any proceeding currently pending against any person named in Section II that could result in a conviction or finding described in subsection A, above? Yes
 No
- 2. Is there any proceeding currently pending against any person named in Section II that could result in the reversal of a conviction or finding described in subsection A, above? Yes
 No

C. Prior Application Information

If (i) the applicant has previously submitted the Attachments required pursuant to subsections A and B above and (ii) the Attachments previously submitted are still complete, true, and correct, then the applicant does not need to include Attachments with this submission if the following box is checked:

By checking this box, I affirm that the Attachments previously submitted are still complete, true, and correct and wish to incorporate them into this Certification.

If the above box is checked, identify the application that contains the previously submitted Attachments that are complete, true, and correct.

Authorization for Release of Information

This Certification must be signed by an officer of the applicant.

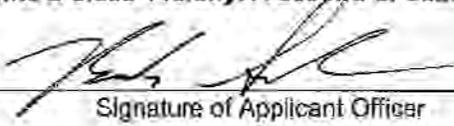
The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by and to a duly authorized agent of the Illinois Environmental Protection Agency, whether the records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records.

The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

Certification Statements

I certify under penalty of law that the information submitted, including information on any Attachments submitted as part of or incorporated into this Certification, 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.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))



Signature of Applicant Officer

7/24/23

Date

Brandon Smith

Printed Name

President

Title

Attachment 2

Updated Leachate Values

Modern Plating Corporation

Daily CAMU Pumping

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
2003	1-1-03 through 12-31-03	5947	11247	17194
2004	1-1-04 through 12-31-04	1849	8477	10326
2005	1-1-05 through 12-31-05	3918	7769	11687
2006	1-1-06 through 12-31-06	1624	3331	4955
2007	9-1-06 through 8-31-07	2383	2987	5370
2008	9-1-07 through 8-31-08	5501	5378	10879
2009	9-1-08 through 8-31-09	2628	3918	6546
2010	9-1-09 through 8-31-10	469	1488	1957
2011	9-1-10 through 8-31-11	0	0	0
2012	9-1-11 through 8-31-12	0	0	0
2013	9-1-12 through 8-31-13	0	0	0
2014	9-1-13 through 8-31-14	0	0	0
2015	9-1-14 through 8-31-15	0	0	0
2016	9-1-15 through 8-31-16	0	0	0
2017	9-1-16 through 6-30-17	0	0	0
2018	9-1-17 through 6-30-18	0	0	0
2019	9-1-18 through 6-30-19	0	0	0
2020	7-1-19 through 6-30-20	0	0	0
2021	7-1-20 through 6-30-21	0	0	0
2022	7-1-21 through 6-30-22	0	0	0
2023	7-1-22 through 6-30-23	0	0	0

Prior 3-year average (2021 through 2023):

0 gallons/year

Attachment 3

Updated Post Closure Care Cost Estimate

7/21/2023

**Updated Post Closure Care Cost Estimate
For Modern Plating Corporation**

**RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: ILD005172325**

Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1. Site Inspections and Report (annual) (1 per year)	1 per year	\$1,342 each	\$1,342
2. Land Surface Care <ul style="list-style-type: none"> <li data-bbox="667 1423 737 1780">• Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) <li data-bbox="769 1262 839 1780">• Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) <li data-bbox="872 1367 941 1780">• Snow Plowing (Assume 2 snowfall events) 	1.8 cy 0.2 acres 2 each	\$73.23/cy \$3,174/acre \$244 each	\$132 \$635 \$488
3. Leachate Treatment ¹	0 ³ gal/yr	\$0.04/gal	\$0.00
4. Leachate Hauling ²	0 gal/yr	\$0.25/gal	\$0.00
5. Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> <li data-bbox="1154 1192 1256 1780">• Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) <li data-bbox="1289 1304 1326 1780">• Personnel For Sample Collection <li data-bbox="1359 1205 1429 1780">• Preparation & submittal of semi-annual groundwater monitoring report 	2 sample events per yr 2 sample events per yr	\$3,612/event \$3,782/event	\$7,224 \$7,564 \$7,936

7/21/2023

Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
<ul style="list-style-type: none"> • Leachate Detection System (LDS) Monitoring (1 location, 12 times/year) • Leachate Monitoring (no leachate produced) (1 location, 2 times/year) • Preparation & submittal of 5-year minimum GMZ evaluation (includes 5-yr well elevation surveying) • Surface Water Monitoring (2 locations, 2 times/year) 	<p>12 events</p> <p>0 samples</p> <p>1/5 yrs</p> <p>4 samples</p>	<p>\$121/event</p> <p>\$0.00/sample</p> <p>\$6,019</p> <p>\$49.13/sample</p>	<p>\$1,452</p> <p>\$0.00</p> <p>\$1,204</p> <p>\$197</p>
6. Well Maintenance	1/yr	\$458/yr	\$458
7. Mowing (2 acres per year)	2 acres	\$110/acre	\$220
8. Landfill Sump Pump (No leachate being produced and none expected)			
Subtotal			\$28,852
Contingency (10%)			\$2,885
Total Cost per Year			\$31,737

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site

³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

Attachment 4

Updated CAMU Financial Assurance

Electronic Filing: Received, Clerk's Office 02/03/2026
Modern Plating Corporation

CAMU Financial Assurance

Annual Maintenance Cost \$ 31,737

	Years Remaining	Financial Assurance Amount
2024	7	\$ 222,159
2025	6	\$ 190,422
2026	5	\$ 158,685
2027	4	\$ 126,948
2028	3	\$ 95,211
2029	2	\$ 63,474
2030	1	\$ 31,737



Certified Mail No. 9589 0710 5270 0635 1412 34
Return Receipt Requested

July 10, 2024

Mr. Mark Crites, P.E.
Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
1021 N. Grand Avenue East
Springfield, Illinois 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 South Hancock Avenue, Freeport, Illinois 61032
IL ID No: 1770200010
Permit No: B-167R-M-12**

Dear Mr. Crites:

On behalf of Modern Plating Corporation, **please find attached the original and three (3) copies** of the RCRA Permit Modification request pursuant to Section II.F.3. of the above-referenced RCRA Permit. The annual post closure care cost estimate was increased by the annual inflation factor of 3.6 percent.

As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average. Please update Section II.F.1. and Attachment A of the aforementioned permit, accordingly, based on the enclosed data.

The following attachments included with this submittal:

- » RCRA Permit Application Form LPC-PA23 and 39(i) Certification
- » Updated Leachate Values
- » Updated Post Closure Care Cost Estimate
- » Updated CAMU Financial Assurance

If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink that reads "Jason Miller". The signature is written in a cursive, flowing style.

Jason A. Miller, CHMM
Project EHS Scientist

JAM:dep

Attachments

cc: Brandon Smith, President, Modern Plating Corporation (Electronic email only)

O:\Modern Plating\24-112 EHS Annual\24-112 Modern Plating 2024.07.08 - IEPA RCRA Modification.docx

Attachment 1

RCRA Permit Application

Form LPC-PA23 and 39(i) Certification



Electronic Filing: Received, Clerk's Office 02/03/2026
Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

RCRA Permit Application Form (LPC-PA23)

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to 1021 North Grand Avenue East between the hours of 8:30 a.m. to 5:00 p.m., Monday through Friday (excluding State holidays).

Please type or print all information legibly.

I. Site Identification

Site # (Illinois EPA): 1770200010 USEPA ID Number: ILD005172325
 Site Name: Modern Plating Corporation
 Physical Site Location (street, road, etc.): 701 S Hancock Avenue
 City: Freeport Zip Code: 61032 County: Stephenson
 Existing RCRA Permit (if applicable): B-167R-M-12

II. Owner/Operator Identification

Owner Information

Name: Modern Plating Corporation
 Mailing Address:
 701 S Hancock Avenue
 PO Box 838
 Freeport, IL 61032
 Contact Name: Brandon Smith
 Phone #: 815-235-3111
 Email: _____

Operator Information

Name: Modern Plating Corporation
 Mailing Address:
 701 S Hancock Avenue
 PO Box 838
 Freeport, IL 61032
 Contact Name: Brandon Smith
 Phone #: 815-235-3111
 Email: _____

A 39(i) certification must be submitted for each of the following persons or entities:

- the owner of the business entity applying for the permit;
- the operator of the business entity applying for the permit;
- each officer of the owner or operator, including any officer that signed the permit application;
- each employee of the owner or operator who signed the permit application; and
- any additional owner, operator, or officer or employee of the owner or operator from whom a certification is requested by the Illinois EPA, including any officer or employee who will be responsible for overseeing or implementing regulated activities governed by the permit.

III. Permit Application Identification

Application Type

- New Part B Permit
- Part B Permit Renewal
- Class 1 Modification
- Class 1* (prior approval required) Modification
- Class 2 Modification
- Class 3 Modification
- Additional information to supplement UIC Class I application Log Number
- Remedial Action Plan Permit (RAPP)
- Sig RAPP Modification
- Non Sig RAPP Modification
- Major UIC Modification
- Minor UIC Modification

This Application Involves

- Storage
- Groundwater
- Treatment
- Corrective Action
- Disposal
- UIC Class I
- Incineration
- UIC Class V

Description of This Permit Request: (Include a brief narrative description here.)

Annual requirement (Section II F3) for RCRA permit modification to update the post-closure cost estimate and amount of financial assurance based on 3-year rolling average of leachate generation.

IV. SIGNATURES

Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

Owner

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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): David Servatius

Owner Signature:  Date: 7/19/2024

Title: owner

Operator

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): Modern Plating Corporation c/o Brandon Smith

Operator Signature: *[Handwritten Signature]* Date: 7/18/24

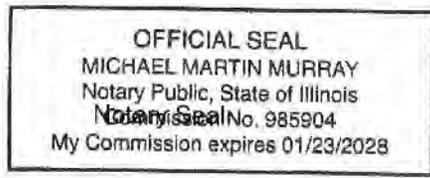
Title: President

Notary (Required for both owner and operator signatures)

Subscribed and Sworn before me this 18 day of July 2024.

Notary Signature: *[Handwritten Signature: Michael M. Murray]*

My commission expires on: January 23, 2024



Engineer

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Print or Type): Andrew J. Reeter

Engineer Signature: *[Handwritten Signature: Andrew Reeter]*

Illinois License No.: 062-061732

Expiration Date of License: 11/30/2025

Engineer Phone No. 815-235-7643

Email: areeter@fehrgraham.com

Engineer Address:
Fehr Graham
101 West Stephenson Street
Freeport, IL 61032



Engineer Seal

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))



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Illinois Environmental Protection Agency

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**39(i) Certification
 for Operating a Waste Management Facility**

Pursuant to 415 ILCS 5/39(i), prior to issuing any RCRA permit, or any permit for a waste storage site, sanitary landfill, waste disposal site, waste transfer station, waste treatment facility, waste incinerator, clean construction or demolition debris fill operation, or used tire storage site, the Illinois EPA must conduct an evaluation of the prospective owner's or operator's prior experience in waste management operations, clean construction or demolition debris fill operations, and tire storage site management. As part of that evaluation please complete and submit this form with your permit application.

This form may be completed online and saved locally before printing, signing and submitting it to the Illinois EPA at the address below. If the form is completed manually, please type or print clearly.

Illinois Environmental Protection Agency
 Division of Land Pollution Control - #33
 39(i) Certification
 1021 North Grand Avenue East
 P.O. Box 19276
 Springfield, IL 62794-9276

I. Applicant Information

Site Name: Modern Plating Corporation IEPA BOL No.: 1770200010
 Site Address: 701 S Hancock Avenue
 City: Freeport State: IL Zip Code: 61032
 Permit Numbers (if applicable): B-167R-M-12

Owner Operator

Owner Name: David Servatius Operator Name: Modern Plating Corp c/o Brandon Smith
 Street Address: 701 S Hancock Avenue Street Address: 701 S Hancock Avenue
 City: Freeport State: IL Zip: 61032 City: Freeport State: IL Zip: 61032

II. Officers and Employees with Site Responsibility

A. Officers: List the name and title of all officers of the owner or operator that will have personal involvement or active participation in the operation or management of the site or facility for which the application is submitted.

Name	Title
Brandon Smith	President
David Servatius	Vice President

B. Employees: List the name and title of each employee of the owner or operator that will have personal involvement or active participation in the overall operation or management of the site or facility for which the application is submitted (e.g. site managers, site engineers, and other persons who direct or control the overall day-to-day management of the operation, but not persons whose duties are exclusively limited to equipment operation, labor, or similar non-managerial functions).

Name	Title

III. Owner, Operator, Officer, and Employee Information

A. Prior Conduct Identification

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified under Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and include a copy of each final administrative or judicial determination that required an affirmative response. If the information for each owner, operator, officer, and employee has not changed since the applicant's last submission of a 39(i) certification, the applicant can skip to Section III(C), below.

- 1) Has there been a finding that any person named in Section II violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes No
- 2) Has any person named in Section II ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes No
- 3) Has there been a finding against any person named in Section II of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes No

B. Pending Proceedings

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified in Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and provide information identified in Attachment A regarding the pending proceeding.

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- 2. Is there any proceeding currently pending against any person named in Section II that could result in the reversal of a conviction or finding described in subsection A, above? Yes No

C. Prior Application Information

If (i) the applicant has previously submitted the Attachments required pursuant to subsections A and B above and (ii) the Attachments previously submitted are still complete, true, and correct, then the applicant does not need to include Attachments with this submission if the following box is checked:

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If the above box is checked, identify the application that contains the previously submitted Attachments that are complete, true, and correct.

Authorization for Release of Information

This Certification must be signed by an officer of the applicant.

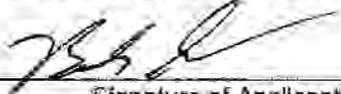
The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by and to a duly authorized agent of the Illinois Environmental Protection Agency, whether the records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records.

The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

Certification Statements

I certify under penalty of law that the information submitted, including information on any Attachments submitted as part of or incorporated into this Certification, 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.

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Signature of Applicant Officer

7/18/24

Date

Brandon Smith

Printed Name

President

Title

Attachment 2

Updated Leachate Values

Modern Plating Corporation

Daily CAMU Pumping

Year	Time Period	Gallons Pumped		Total
		Phase I	Phase II	
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2005	1-1-05 through 12-31-05	3918	7769	11687
2006	1-1-06 through 12-31-06	1624	3331	4955
2007	9-1-06 through 8-31-07	2383	2987	5370
2008	9-1-07 through 8-31-08	5501	5378	10879
2009	9-1-08 through 8-31-09	2628	3918	6546
2010	9-1-09 through 8-31-10	469	1488	1957
2011	9-1-10 through 8-31-11	0	0	0
2012	9-1-11 through 8-31-12	0	0	0
2013	9-1-12 through 8-31-13	0	0	0
2014	9-1-13 through 8-31-14	0	0	0
2015	9-1-14 through 8-31-15	0	0	0
2016	9-1-15 through 8-31-16	0	0	0
2017	9-1-16 through 6-30-17	0	0	0
2018	9-1-17 through 6-30-18	0	0	0
2019	9-1-18 through 6-30-19	0	0	0
2020	7-1-19 through 6-30-20	0	0	0
2021	7-1-20 through 6-30-21	0	0	0
2022	7-1-21 through 6-30-22	0	0	0
2023	7-1-22 through 6-30-23	0	0	0
2024	7-1-23 through 6-30-24	0	0	0

Prior 3-year average (2022 through 2024):

0 gallons/year

Attachment 3

Updated Post Closure Care Cost Estimate

7/9/2024

**Updated Post Closure Care Cost Estimate
For Modern Plating Corporation**

**RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: ILD005172325**

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,390 each	\$1,390
2.	Land Surface Care <ul style="list-style-type: none"> » Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) » Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) » Snow Plowing (Assume 2 snowfall events) 	1.8 cy 0.2 acres 2 each	\$75.87/cy \$3,288/acre \$253 each	\$137 \$658 \$506
3.	Leachate Treatment ¹	0 ³ gal/yr	\$0.04/gal	\$0.00
4.	Leachate Hauling ²	0 gal/yr	\$0.26/gal	\$0.00
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> » Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) » Personnel For Sample Collection » Preparation & submittal of semi-annual groundwater monitoring report 	2 sample events per yr 2 sample events per yr 2/yr	\$3,742/event \$3,918/event \$4,111/event	\$7,484 \$7,836 \$8,222

7/9/2024

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
	<ul style="list-style-type: none"> » Leachate Detection System (LDS) Monitoring (1 location, 12 times/year) » Leachate Monitoring (no leachate produced) (1 location, 2 times/year) » Preparation & submittal of 5-year minimum GMZ evaluation (includes 5-yr well elevation surveying) » Surface Water Monitoring (2 locations, 2 times/year) 	<p>12 events</p> <p>0 samples</p> <p>1/5 yrs</p> <p>4 samples</p>	<p>\$125/event</p> <p>\$0.00/sample</p> <p>\$6,236</p> <p>\$51/sample</p>	<p>\$1,500</p> <p>\$0.00</p> <p>\$1,247</p> <p>\$204</p>
6.	Well Maintenance	1/yr	\$474/yr	\$474
7.	Mowing (2 acres per year)	2 acres	\$114/acre	\$228
8.	Landfill Sump Pump (No leachate being produced, and none expected)			
		Subtotal		\$29,886
			Contingency (10%)	\$2,989
			Total Cost per Year	\$32,875

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site

³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

Attachment 4

Updated CAMU Financial Assurance



UPS 2nd Day Tracking: 1Z 651 395 07 9448 2050

July 22, 2025

Illinois Environmental Protection Agency
Bureau of Land Permit Section-#33
2520 W. Iles Avenue
Springfield, Illinois 62794-9276

**Re: RCRA Permit Modification
Modern Plating Corporation
701 South Hancock Avenue, Freeport, Illinois 61032
IL ID No: 1770200010
Permit No: B-167R-M-12**

Dear Project Manager:

On behalf of Modern Plating Corporation, **please find attached the original and three (3) copies** of the RCRA Permit Modification request pursuant to Section II.F.3. of the above-referenced RCRA Permit. The annual post closure care cost estimate was increased by the annual inflation factor of 2.4 percent.

As identified on the attached form and required by the above-referenced special condition, the intent of this permit modification is to update the post closure cost estimate and required financial assurance values based on the most recent 3-year rolling average. Please update Section II.F.1. and Attachment A of the aforementioned permit, accordingly, based on the enclosed data.

The following attachments included with this submittal:

- » RCRA Permit Application Form LPC-PA23 and 39(i) Certification
- » Updated Leachate Values
- » Updated Post Closure Care Cost Estimate
- » Updated CAMU Financial Assurance

If you have any questions or need any additional information, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink that reads "Jason Miller". The signature is written in a cursive style.

Jason A. Miller, CHMM
Project EHS Scientist

JAM:dep

Attachments

cc: Brandon Smith, President, Modern Plating Corporation (Electronic email only)

O:\Modern Plating\25-112 EHS Annual\25-112 Modern Plating 2025-07-22 - IEPA RCRA Modification.docx

Attachment 1

RCRA Permit Application

Form LPC-PA23 and 39(i) Certification



Electronic Filing: Received, Clerk's Office 02/03/2026
Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

RCRA Permit Application Form (LPC-PA23)

This form must be used for any permit application for a hazardous waste management facility regulated in accordance with RCRA, Subtitle C, including all requests to modify an existing permit. One original and three (3) copies, of all permit applications must be submitted. Attach the original and appropriate number of copies of a cover letter, any necessary plans, specifications, reports, forms, (e.g., corrective action certification form), and any other certifications etc. to fully support and describe the activities or modifications being proposed. Attach sufficient information to demonstrate compliance with all applicable regulatory requirements. Applications without this form will be deemed incomplete. Please refer to the RCRA checklist and decision guide documents for further guidance. For RCRA corrective action, this form should only be used if requesting an actual modification to a RCRA permit. A RCRA Corrective Action Certification form should be used in all other instances.

Note: Permit applications which are hand-delivered to the Bureau of Land, Permit Section must be delivered to 1021 North Grand Avenue East between the hours of 8:30 a.m. to 5:00 p.m., Monday through Friday (excluding State holidays).

Please type or print all information legibly.

I. Site Identification

Site # (Illinois EPA): 1770200010 USEPA ID Number: ILD005172325
 Site Name: Modern Plating Corporation
 Physical Site Location (street, road, etc.): 701 S Hancock Avenue
 City: Freeport Zip Code: 61032 County: Stephenson
 Existing RCRA Permit (if applicable): B-167R-M-12

II. Owner/Operator Identification

Owner Information

Name: Modern Plating Corporation
 Mailing Address:
 701 S Hancock Avenue
 PO Box 838
 Freeport, IL 61032
 Contact Name: Brandon Smith
 Phone #: 815-235-3111
 Email: _____

Operator Information

Name: Modern Plating Corporation
 Mailing Address:
 701 S Hancock Avenue
 PO Box 838
 Freeport, IL 61032
 Contact Name: Brandon Smith
 Phone #: 815-235-3111
 Email: _____

A 39(i) certification must be submitted with information concerning the following persons or entities:

- the owner of the business entity applying for the permit;
- the operator of the business entity applying for the permit;
- each employee or officer of the owner or operator who signed the permit application or has managerial authority at the site; and
- any additional owner, operator, or officer or employee of the owner or operator from whom a certification is requested by the Illinois EPA, including any officer or employee who will be responsible for overseeing or implementing regulated activities governed by the permit.

III. Permit Application Identification

Application Type

- New Part B Permit
- Part B Permit Renewal
- Class 1 Modification
- Class 1* (prior approval required) Modification
- Class 2 Modification
- Class 3 Modification
- Additional information to supplement UIC Class I application Log Number
- Remedial Action Plan Permit (RAPP)
- Sig RAPP Modification
- Non Sig RAPP Modification
- Major UIC Modification
- Minor UIC Modification

This Application Involves

- Storage
- Groundwater
- Treatment
- Corrective Action
- Disposal
- UIC Class I
- Incineration
- UIC Class V

Description of This Permit Request: (Include a brief narrative description here.)

Annual requirement (Section II F3) for RCRA permit modification to update post-closure cost estimate and amount of financial assurance based on 3-year rolling average of leachate generation.

IV. SIGNATURES

Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable. All applications shall be signed by the person in accordance with 35 IAC 702.126(a).

Please check the box of the appropriate certification.

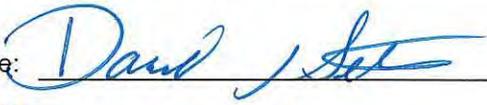
Owner

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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Alternative owner certification. For remedial action plans (RAPs) permit under Subpart H of 35 IAC 703, the owner may choose to make the following certification instead of the certification above.

Based on my knowledge of the conditions of the property described in the RAP and my inquiry of the person or persons that manage the system referenced in the operator's certification, or those persons directly responsible for gathering the information, the information submitted is, upon information 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.

Owner Name (Printed or Typed): David Servatius

Owner Signature:  Date: 7/23/2025

Title: owner

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Operator

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Operator Name (Printed or Typed): Modern Plating Corporation c/o Brandon Smith

Operator Signature: _____

Date: 7/23/25

Title: President

Notary (Required for both owner and operator signatures)

Subscribed and Sworn before me this 23 day of July 20 25.

Notary Signature: _____



My commission expires on: January 23, 2028

Notary Seal

Engineer

I certify under penalty of law that this document and all attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons that 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.

Engineer Name (Print or Type): Andrew Reeter

Engineer Signature: _____

7/28/25

Illinois License No.: 062-061732

Expiration Date of License: 11/30/2025

Engineer Phone No. 815-235-7643

Email: areeter@fehrgraham.com

Engineer Address:

Fehr Graham
101 West Stephenson Street
Freeport, IL 61032



Engineer Seal

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act, applicable Rules and Regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))



Electronic Filing: Received, Clerk's Office 02/03/2026
Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

**39(i) Certification
 for Operating a Waste Management Facility**

Pursuant to 415 ILCS 5/39(i), prior to issuing any RCRA permit, or any permit for a waste storage site, sanitary landfill, waste disposal site, waste transfer station, waste treatment facility, waste incinerator, clean construction or demolition debris fill operation, or used tire storage site, the Illinois EPA must conduct an evaluation of the prospective owner's or operator's prior experience in waste management operations, clean construction or demolition debris fill operations, and tire storage site management. As part of that evaluation please complete and submit this form with your permit application.

This form may be completed online and saved locally before printing, signing and submitting it to the Illinois EPA at the address below. If the form is completed manually, please type or print clearly.

Illinois Environmental Protection Agency
 Division of Land Pollution Control - #33
 39(i) Certification
 2520 West Iles Avenue
 P.O. Box 19276
 Springfield, IL 62794-9276

I. Applicant Information

Site Name Modern Plating Corporation IEPA BOL No.: 1770200010

Site Address 701 S Hancock Avenue

City: Freeport

State: IL

Zip Code: 61032

Permit Numbers (if applicable): B-167R-M-12

Owner

Owner Name: David Servatius

Street Address: 701 S Hancock Avenue

City: Freeport

State: IL

Zip: 61032

Operator

Operator Name: Modern Plating Corp c/o Brandon Smith

Street Address: 701 S Hancock Avenue

City: Freeport

State: IL

Zip: 61032

Is this 39(i) certification for the owner or the operator?

Owner

Operator

Owner and operator are the same entity

II. Officers and Employees with Site Responsibility

Unless the owner and operator are the same entity, a separate 39(i) form must be submitted for both the owner and operator. Persons operating under the authority of the owner should be listed on the owner's 39(i) form and persons operating under authority of the operator should be listed on the operator's 39(i) form.

A. Officers: List the name and title of all officers of the owner or operator that will have personal involvement or active participation in the operation or management of the site or facility for which the application is submitted.

Name	Title

B. Employees: List the name and title of each employee of the owner or operator that will have personal involvement or active participation in the overall operation or management of the site or facility for which the application is submitted (e.g. site managers, site engineers, and other persons who direct or control the overall day-to-day management of the operation, but not persons whose duties are exclusively limited to equipment operation, labor, or similar non-managerial functions).

Name	Title

III. Owner, Operator, Officer, and Employee Information

A. Prior Conduct Identification

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified under Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and include a copy of each final administrative or judicial determination that required an affirmative response. If the information for each owner, operator, officer, and employee has not changed since the applicant's last submission of a 39(i) certification, the applicant can skip to Section III(C), below.

- 1) Has there been a finding that any person named in Section II violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes
 No
- 2) Has any person named in Section II ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes
 No
- 3) Has there been a finding against any person named in Section II of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes
 No

B. Pending Proceedings

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified in Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and provide information identified in Attachment A regarding the pending proceeding.

- 1. Is there any proceeding currently pending against any person named in Section II that could result in a conviction or finding described in subsection A, above? Yes
 No
- 2. Is there any proceeding currently pending against any person named in Section II that could result in the reversal of a conviction or finding described in subsection A, above? Yes
 No

C. Prior Application Information

If (i) the applicant has previously submitted the Attachments required pursuant to subsections A and B above and (ii) the Attachments previously submitted are still complete, true, and correct, then the applicant does not need to include Attachments with this submission if the following box is checked:

By checking this box, I affirm that the Attachments previously submitted are still complete, true, and correct and wish to incorporate them into this Certification.

If the above box is checked, identify the application that contains the previously submitted Attachments that are complete, true, and correct.

Electronic Filing: Received, Clerk's Office 02/03/2026
Authorization for Release of Information

This Certification must be signed by an officer of the applicant.

The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by and to a duly authorized agent of the Illinois Environmental Protection Agency, whether the records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records.

The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

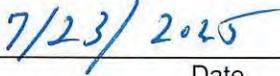
Certification Statements

I certify under penalty of law that the information submitted, including information on any Attachments submitted as part of or incorporated into this Certification, 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.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))



Signature of Applicant Officer



Date

David Servatius

Printed Name

Owner

Title



Electronic Filing: Received, Clerk's Office 02/03/2026
Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

**39(i) Certification
 for Operating a Waste Management Facility**

Pursuant to 415 ILCS 5/39(i), prior to issuing any RCRA permit, or any permit for a waste storage site, sanitary landfill, waste disposal site, waste transfer station, waste treatment facility, waste incinerator, clean construction or demolition debris fill operation, or used tire storage site, the Illinois EPA must conduct an evaluation of the prospective owner's or operator's prior experience in waste management operations, clean construction or demolition debris fill operations, and tire storage site management. As part of that evaluation please complete and submit this form with your permit application.

This form may be completed online and saved locally before printing, signing and submitting it to the Illinois EPA at the address below. If the form is completed manually, please type or print clearly.

Illinois Environmental Protection Agency
 Division of Land Pollution Control - #33
 39(i) Certification
 2520 West Iles Avenue
 P.O. Box 19276
 Springfield, IL 62794-9276

I. Applicant Information

Site Name Modern Plating Corporation IEPA BOL No.: 1770200010

Site Address 701 S Hancock Avenue

City: Freeport State: IL Zip Code: 61032

Permit Numbers (if applicable): B-167R-M-12

Owner

Owner Name: David Servatius

Street Address: 701 S Hancock Avenue

City: Freeport State: IL Zip: 61032

Operator

Operator Name: Modern Plating Corp c/o Brandon Smith

Street Address: 701 S Hancock Avenue

City: Freeport State: IL Zip: 61032

Is this 39(i) certification for the owner or the operator?

Owner Operator Owner and operator are the same entity

II. Officers and Employees with Site Responsibility

Unless the owner and operator are the same entity, a separate 39(i) form must be submitted for both the owner and operator. Persons operating under the authority of the owner should be listed on the owner's 39(i) form and persons operating under authority of the operator should be listed on the operator's 39(i) form.

A. Officers: List the name and title of all officers of the owner or operator that will have personal involvement or active participation in the operation or management of the site or facility for which the application is submitted.

Name	Title
Brandon Smith	President
Dave Servatius	Vice President

B. Employees: List the name and title of each employee of the owner or operator that will have personal involvement or active participation in the overall operation or management of the site or facility for which the application is submitted (e.g. site managers, site engineers, and other persons who direct or control the overall day-to-day management of the operation, but not persons whose duties are exclusively limited to equipment operation, labor, or similar non-managerial functions).

Name	Title

III. Owner, Operator, Officer, and Employee Information

A. Prior Conduct Identification

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified under Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and include a copy of each final administrative or judicial determination that required an affirmative response. If the information for each owner, operator, officer, and employee has not changed since the applicant's last submission of a 39(i) certification, the applicant can skip to Section III(C), below.

- 1) Has there been a finding that any person named in Section II violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? Yes
 No
- 2) Has any person named in Section II ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? Yes
 No
- 3) Has there been a finding against any person named in Section II of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? Yes
 No

B. Pending Proceedings

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified in Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and provide information identified in Attachment A regarding the pending proceeding.

- 1. Is there any proceeding currently pending against any person named in Section II that could result in a conviction or finding described in subsection A, above? Yes
 No
- 2. Is there any proceeding currently pending against any person named in Section II that could result in the reversal of a conviction or finding described in subsection A, above? Yes
 No

C. Prior Application Information

If (i) the applicant has previously submitted the Attachments required pursuant to subsections A and B above and (ii) the Attachments previously submitted are still complete, true, and correct, then the applicant does not need to include Attachments with this submission if the following box is checked:

By checking this box, I affirm that the Attachments previously submitted are still complete, true, and correct and wish to incorporate them into this Certification.

If the above box is checked, identify the application that contains the previously submitted Attachments that are complete, true, and correct.

Electronic Filing: Received, Clerk's Office 02/03/2026
Authorization for Release of Information

This Certification must be signed by an officer of the applicant.

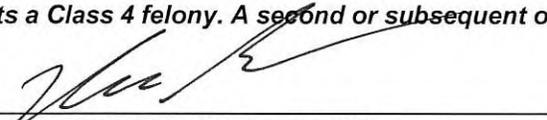
The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by and to a duly authorized agent of the Illinois Environmental Protection Agency, whether the records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records.

The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

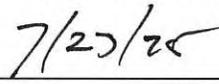
Certification Statements

I certify under penalty of law that the information submitted, including information on any Attachments submitted as part of or incorporated into this Certification, 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.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))



Signature of Applicant Officer



Date

Brandon Smith

Printed Name

President

Title

Attachment 2

Updated Leachate Values

**Modern Plating Corporation
Daily CAMU Pumping**

Year	Time Period	Total
2003	1-1-03 through 12-31-03	17194
2004	1-1-04 through 12-31-04	10326
2005	1-1-05 through 12-31-05	11687
2006	1-1-06 through 12-31-06	4955
2007	9-1-06 through 8-31-07	5370
2008	9-1-07 through 8-31-08	10879
2009	9-1-08 through 8-31-09	6546
2010	9-1-09 through 8-31-10	1957
2011	9-1-10 through 8-31-11	0
2012	9-1-11 through 8-31-12	0
2013	9-1-12 through 8-31-13	0
2014	9-1-13 through 8-31-14	0
2015	9-1-14 through 8-31-15	0
2016	9-1-15 through 8-31-16	0
2017	9-1-16 through 6-30-17	0
2018	9-1-17 through 6-30-18	0
2019	9-1-18 through 6-30-19	0
2020	7-1-19 through 6-30-20	0
2021	7-1-20 through 6-30-21	0
2022	7-1-21 through 6-30-22	0
2023	7-1-22 through 6-30-23	0
2024	7-1-23 through 6-30-24	2000
2025	7-1-24 through 6-30-25	18265

Prior 3-year average (2023 through 2025): 6755

Attachment 3

Updated Post Closure Care Cost Estimate

**Updated Post Closure Care Cost Estimate
For Modern Plating Corporation**

**RCRA Post-Closure Permit
IEPA ID No.: #1770200010
USEPA ID No.: ILD005172325**

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1.	Site Inspections and Report (annual) (1 per year)	1 per year	\$1,423 each	\$1,423
2.	Land Surface Care <ul style="list-style-type: none"> » Erosion Damage Repair (0.9 cy/acres/yr on 2 acres) » Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr) » Snow Plowing (Assume 2 snowfall events) 	1.8 cy 0.2 acres 2 each	\$77.69/cy \$3,367/acre \$259 each	\$140 \$673 \$518
3.	Leachate Treatment ¹	6,755 ³ gal/yr	\$0.05/gal	\$338
4.	Leachate Hauling ²	6,755 gal/yr	\$0.27/gal	\$1,824
5.	Environmental Monitoring (semi-annually) <ul style="list-style-type: none"> » Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) » Personnel For Sample Collection » Preparation & submittal of semi-annual groundwater monitoring report 	2 sample events per yr 2 sample events per yr 2/yr	\$3,832/event \$4,012/event \$4,210/event	\$7,664 \$8,024 \$8,420

7/21/2025

	Item/Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
	<ul style="list-style-type: none"> » Leachate Detection System (LDS) Monitoring (1 location, 12 times/year) » Leachate Monitoring (1 location, 2 times/year) » Preparation & submittal of 5-year minimum GMZ evaluation (includes 5-yr well elevation surveying) » Surface Water Monitoring (2 locations, 2 times/year) 	<p>12 events</p> <p>2 samples</p> <p>1/5 yrs</p> <p>4 samples</p>	<p>\$128/event</p> <p>\$600/sample</p> <p>\$6,386</p> <p>\$52/sample</p>	<p>\$1,536</p> <p>\$1,200</p> <p>\$1,277</p> <p>\$208</p>
6.	Well Maintenance	1/yr	\$485/yr	\$485
7.	Mowing (2 acres per year)	2 acres	\$117/acre	\$234
8.	Landfill Sump Pump	1/5 yrs	\$10,300	\$2,060
			Subtotal	\$36,024
			Contingency (10%)	\$3,602
			Total Cost per Year	\$39,626

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant

² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site

³ Leachate volume is the average of the total amount of leachate generated in the 3 years prior to this submittal

Attachment 4

Updated CAMU Financial Assurance

EXHIBIT D



Electronic Filing: Received, Clerk's Office 02/03/2026
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

RCRA POST-CLOSURE PERMIT

IEPA #1770200010 -- Stephenson County
Modern Plating Corporation
ILD #005 172 325
RCRA Permit File
RCRA Log Nos. B-167R

Issue Date: June 9, 2011
Effective Date: July 7, 2011
Expiration Date: July 7, 2021

Owner

Lucille Miller
Modern Plating Corporation
701 South Hancock Avenue
P.O. Box 838
Freeport, Illinois 61032-0838

Operator

James R. Stenberg
Modern Plating Corporation
701 South Hancock Avenue
P.O. Box 838
Freeport, Illinois 61032-0838

A RCRA post-closure permit renewal is hereby granted for Modern Plating Corporation (MPC) to provide post-closure maintenance for a corrective action management unit (CAMU). Only remediation wastes generated during RCRA closure and/or corrective action activities at the Modern Plating facility were placed in the CAMU. Modern Plating Corporation is located at 701 South Hancock Avenue in Freeport, Illinois.

This permit is issued pursuant to Section 39(d) of the Illinois Environmental Protection Act and Title 35 Illinois Administrative Code (35 Ill. Adm. Code) Subtitle G. This permit consists of the conditions contained herein (including those in any attachments). The Permittee must comply with all terms and conditions of this permit and the applicable regulations contained in 35 Ill. Adm. Code Parts 702, 703, 705 and 720 through 729 in effect on the effective date of this permit.

This permit is issued based on the information submitted in the permit application, and any subsequent amendments (hereafter referred to as the approved permit application). Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 35 Ill. Adm. Code 702.187 and 702.186) and potential enforcement action.

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Approved Permit Application

The permit application approved by this permit consists of the documents listed below:

<u>DOCUMENT</u>	<u>DATED</u>	<u>RECEIVED</u>
Groundwater Management Zone Re-Evaluation (Logged as B-167-CA-1)	June 2, 2009	June 5, 2009
Renewal Application	November 17, 2009	December 7, 2009
Response to 1 st Completeness NOD	March 30, 2010	April 1, 2010
Updated Post-Closure Cost Estimates (Logged as B-167-M-10)	September 30, 2010	October 5, 2010
Water Well Survey	January 25, 2011	January 31, 2011

If you have any questions regarding this permit, please contact Mark L. Crites, P.E. at 217/524-3269.

Sincerely,



Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land

SFN: WRW/mis/053443s.doc

cc: Dale Meyer, U.S. EPA – Region V
Ron Meister, Foth & Van Dyke
Gene Fox, Fehr-Graham & Associates
Jim Meason

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SECTION I

DESIGN, CONSTRUCTION, OPERATION, AND CLOSURE OF THE CORRECTIVE ACTION MANAGEMENT UNIT

A. AUTHORIZATION OF CAMU

For the purpose of implementing remedies under 35 IAC 724.201, the Illinois EPA designated a new unit at the Modern Plating facility as a permanent Corrective Action Management Unit (CAMU), as defined in 35 IAC 720.110. The design, construction, operation, and maintenance of the CAMU shall be conducted in accordance with the approved permit application, the requirements contained in this permit, and the regulations at 35 IAC 724.652. Placement of remediation waste into or within a CAMU does not constitute land disposal of hazardous wastes. Consolidation or placement of remediation wastes into or within a CAMU does not constitute creation of a unit subject to minimum technology standards.

B. UNIT IDENTIFICATION

The general location of the permanent CAMU is shown in Figure 1 of this permit. The CAMU is located north of the wastewater treatment plant and was constructed in the same location that Lagoons 2 and 3 used to occupy. The CAMU is about 1.2 acres in size and holds remediation wastes generated from the closure and remediation of hazardous waste and solid waste management units at the Modern Plating facility. The permitted volume of the landfill was 17,610 cy (cubic yards) with a maximum volume of approximately 22,800 cy. The total in-place volume of sludge and soil actually in the CAMU is approximately 14,500 cy.

C. WASTE IDENTIFICATION

1. The Permittee was only allowed to place the following types of remediation wastes in the CAMU: Electroplating Sludge (F006) and soils contaminated with cadmium, chromium, cyanide, and trichloroethylene (F002). This included soils from the lagoons, shawnee building, cyanide vault, wetlands areas, outfall pipeline areas, and any other areas where similar remediation wastes were located during the closure and corrective actions at the facility.

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2. The Permittee is prohibited from placing wastes in the CAMU that are not included in Condition C.1 above without prior authorization from the Illinois EPA via a permit modification.

D. DESIGN, CONSTRUCTION, AND OPERATING REQUIREMENTS

1. The Permittee constructed, operated, and maintained the CAMU in accordance with the plans and specifications contained in the approved permit application and the conditions in this permit. Any changes to the CAMU described in the approved permit application and this permit shall be pre-approved by the Illinois EPA before they can be implemented by the permittee.
2. The horizontal extent and location of the CAMU is identified in Figure 1 of this permit. The CAMU was constructed above elevation 757.0. The sumps in the CAMU were constructed above elevation 753.5. The interior side slopes in the CAMU are not steeper than 3:1 (3 feet horizontal to 1 foot vertical). The slopes of the final cover on the CAMU are not steeper than 3:1 on the perimeter slopes constructed of contaminated soils, and not steeper than 6:1 for the areas covering sludge. The CAMU was designed and constructed to achieve a minimum static slope factor of safety greater than or equal to 1.5 and a seismic factor of safety greater than or equal to 1.3. Any modification to these design parameters shall be the subject of a permit modification.
3. The liner system on the bottom and sides of the CAMU was constructed of the following layers, described from the top to bottom:
 - Geocomposite drainage material (high density polyethylene (HDPE) drainage net sandwiched between two layers of geotextile material) with a minimum transmissivity of $3 \times 10^{-5} \text{ m}^2/\text{sec}$
 - 60 mil HDPE geomembrane (textured on both sides)
 - HDPE drainage net (geocomposite on the side slopes) with a minimum transmissivity of $3 \times 10^{-5} \text{ m}^2/\text{sec}$
 - 60 mil HDPE geomembrane (textured on both sides)
 - Geosynthetic clay liner (GCL)
4. The cover system on the top of the CAMU was constructed of the following layers, described from the top to bottom:
 - 6 inches of topsoil (vegetative layer)
 - 18 inches of cover soil (rooting layer)
 - Geocomposite drainage material (HDPE drainage net sandwiched between two layers of geotextile material)

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- 40 mil HDPE geomembrane (textured on both sides)
 - Geosynthetic clay liner (GCL)
 - 6 inches of grading/venting layer
5. The leachate collection and removal system is designed and operated to ensure that the depth of leachate over the liner does not exceed more than 1 foot (30 cm).
 6. The Permittee shall provide groundwater monitoring for the CAMU in accordance with the approved permit application, and with Section III of this permit.

E. CLOSURE

1. The CAMU was closed in accordance with the approved permit application and the conditions in this permit. The closure of the CAMU was documented in the Closure Documentation Report dated August 3, 2001 and received August 6, 2001 (Log No. B-167-M-3). The approval of permit modification B-167-M-3 constitutes approval of the certification of closure for the CAMU.
2. A survey plat indicating the location and dimensions of the CAMU and any other hazardous waste disposal units with respect to permanently surveyed benchmarks was prepared and certified by a professional land surveyor. The notes on the plat state the owner's and operator's obligation to restrict disturbance of the CAMU in accordance with the applicable Subpart G regulations. These notes state:
 - a. The CAMU contains remediation wastes generated during the closure of hazardous waste and solid waste units at the Modern Plating facility in accordance with an Illinois EPA approved closure plan (Log No. C-259-M-8).
 - b. The waste materials contained in the CAMU are considered RCRA hazardous wastes. They include electroplating sludges (F006), wastes with trichloroethylene (F002), and wastes containing cadmium, chromium, and cyanide.
 - c. Any fill material removed from the CAMU during future activities must be managed as a hazardous waste in accordance with 35 Ill. Adm. Code Subtitle G: Waste Disposal.
 - d. The use of this area is restricted.
3. The Plat of Survey (PIN 18-14-32-402-019) and Drawing No. 2 provided in Appendix J of the August 2001 Closure Documentation Report were filed with the Stephenson County Recorders Office in Freeport, IL on July 26, 2001. The record data is Document

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No. 200100016096, Box 15, pages 111-116 (each 11" x 17" drawing was recorded as 3 separate 8.5" x 11" pages).

The Plat of Survey was attached to the deed to the property and serves as an instrument which is normally examined during title search that will in perpetuity notify any potential purchaser of the property that:

- (a) The waste material in the CAMU is considered a RCRA hazardous waste;
- (b) Use of the area is restricted; and
- (c) A survey plat and record of the type, location and quantity of waste material in the CAMU was filed with the IEPA and the County Recorder.

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SECTION II

POST-CLOSURE CARE

A. SUMMARY

A hazardous waste management unit where waste is left in place must receive post-closure care for at least 30 years after the unit is closed. Activities required during post-closure care include, but are not limited to (1) maintenance of final cover, (2) monitoring of the groundwater, and (3) providing financial assurance for post-closure activities pursuant to 35 IAC Part 724.

B. UNIT IDENTIFICATION

The Permittee shall provide post-closure care for the Corrective Action Management Unit (CAMU) in accordance with the approved permit application and the conditions of this permit. The capacity of the CAMU is approximately 14,500 cubic yards and contains electroplating sludge (F006), soil contaminated with trichloroethylene (F002), and soils contaminated with cadmium, chromium and cyanide.

C. MONITORING, MAINTENANCE, AND RECORDKEEPING

1. The Permittee shall implement the Post-Closure Plan contained in the Approved Permit Application. All post-closure care activities shall be conducted in accordance with the provisions of the approved permit application and the conditions in this permit.
2. The post-closure care period shall begin on August 6, 2001, the date of completion of closure of the unit listed in Condition II.B of this permit (the date the permittee submitted the certification of closure to the Illinois EPA) and continue for thirty (30) years after that date.
3. The Permittee shall maintain the components, structures, and equipment at the site in accordance with the maintenance plan in Attachment B of this permit.
4. The Illinois EPA may include restrictions upon the future use of the site if necessary to protect public health and the environment, including permanent prohibition of the use of the site for purposes which may create an unreasonable risk of injury to human health or the environment. After administrative and judicial challenges to such

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restrictions have been exhausted, the Illinois EPA shall file such restrictions of record in the Office of the Recorder of the county in which the unit is located.

5. The Permittee shall not allow any use of the CAMU listed in Condition II.B of this permit that could disturb the integrity of the final cover system, any component of the containment system, or the function of the facility's monitoring systems during the post-closure care period unless such use is necessary to protect public health or the environment.
6. The permittee shall comply with the requirements for landfills at the CAMU as follows:
 - a. Maintain the integrity and effectiveness of the final cover system, including making repairs as necessary to correct the effects of settling, subsidence, erosion, cracking or other events.

Corrective action shall be taken if ponding water is observed, if cracks or erosion channels greater than one inch wide have formed for whatever reason, if gas, odor, vegetative or vector problems arise, if leachate popouts or seeps are present, or if vegetation with tap roots is found to be growing in areas which are not designed to accommodate such.
 - b. Prevent run-on and run-off from eroding or otherwise damaging the final cover system.
 - c. Maintain and monitor the groundwater monitoring system in accordance with the approved permit application and Section III of this permit.
 - d. Protect and maintain surveyed benchmarks used in complying with surveying and recordkeeping requirements.
 - e. The leachate collection and removal system for the CAMU shall be operated and maintained such that the depth of leachate over the liner in Phase 1 and Phase 2 of the CAMU does not exceed more than 1 foot (30 cm).
 - f. The leachate collection system pumps for the CAMU shall be operated and maintained such that they automatically turn on if leachate in the Phase 1 or Phase 2 sumps reaches an elevation of 757.0 feet as indicated on Drawing I1 in the approved permit application.

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- g. The leachate collection system for the CAMU shall be operated and maintained such that the leachate pump alarms in Phase 1 and Phase 2 of the CAMU are activated if the leachate in either of the sumps reaches an elevation of 758.0 feet.
- h. Representative samples of leachate from Phases 1 and 2 shall be collected from sample ports indicated in Appendix M, Drawing 12 of the Approved Permit Application annually and analyzed individually for the constituents listed in Attachment D. These samples shall be collected during the first quarter inspections. The results of these analyses shall be submitted to the Illinois EPA by June 1 each year.
- i. The Permittee must evaluate the leachate analytical parameter list contained in Attachment D to determine whether any parameters contained in 35 Ill. Adm. Code 724, Appendix I that are not included in Attachment D could potentially be present in the leachate. Any Appendix I parameters identified during this evaluation that could potentially be present in the leachate must be added to the leachate analytical parameter list. This evaluation, along with any additional parameters that should be added to the leachate analytical parameter list must be submitted to Illinois EA within 90 days of the effective date of this permit.
- j. Information required by Condition II.C.6.h must be submitted in an electronic format. The information is to be submitted as fixed-width text files formatted as found in Attachment C. Additional guidance regarding the submittal of the information in an electronic format can be found at <http://www.epa.state.il.us/land/waste-mgmt/groundwater-monitoring.html>.
- k. The following leachate withdrawal points will be used in leachate analysis required by Condition I.C.6.h. For purposes of electronic reporting, the points will be renamed as shown below.

<u>Name in Application</u>	<u>Name for Electronic Reporting</u>
Phase 1 Sample Port	L301
Phase 2 Sample Port	L302

- l. The Permittee shall submit a completed "RCRA Facility Groundwater, Leachate and Gas Reporting form (LPC 592), as a cover sheet for all leachate reports for identification purposes. The form is not be used for permit modification requests.

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D. INSPECTIONS ✓

1. The Permittee shall inspect the components, structures, and equipment associated with the CAMU listed in Condition II.B of this permit in accordance with the inspection schedule in Attachment B of this permit. The term "major rainfall event" as used in the inspection schedule shall be defined as any storm event of ½ inch of rain or more.
2. The date of the first inspection was on August 6, 2001; the date the Closure Documentation Report for the CAMU was submitted to the Illinois EPA Bureau of Land Permit Section.
3. The Permittee shall continue to follow the inspection procedures in Condition II.D.1 above until the post-closure care period for the CAMU listed in Condition II.B of this permit has ended.

E. NOTICES AND CERTIFICATION

1. A request to change the Post-Closure Plan must be submitted in the form of a permit modification request. This request must be in accordance with applicable requirements of 35 Ill. Adm. Code Parts 702, 703 and 724 and must include a copy of the amended Post-Closure Plan for approval by the Illinois EPA. ✓
2. If the Permittee or any subsequent owner or operator of the land upon which the CAMU listed in Condition II.B above is located wishes to remove hazardous waste, hazardous waste residue, the liner, or contaminated soil, they must request a modification to this RCRA post-closure permit in accordance with the applicable requirements in 35 IAC Parts 703, 705 and 724. At a minimum, the owner or operator must demonstrate that the removal of such material will satisfy the criteria of 35 IAC 724.217(c).
3. No later than sixty (60) days after completion of the established post-closure care period for the CAMU listed in Condition II.B of this permit, the Permittee shall submit to the Illinois EPA Bureau of Land Permit Section by registered mail, a certification that the post-closure care for the CAMU was performed in accordance with the specifications in the approved post-closure plan in the approved permit application and the conditions in this permit. The owner and operator and an independent registered professional engineer must sign the certification. Documentation supporting the independent registered professional engineer's certification must be furnished to the Illinois EPA upon request until the Illinois EPA releases the Permittee from the financial assurance requirements for post-closure care.

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4. Within 60 days after receiving certifications from the owner or operator and an independent registered professional engineer that the post-closure care period has been completed for the CAMU listed in Condition II.B of this permit in accordance with the approved post-closure plan, the Agency shall notify the owner or operator that it is no longer required to maintain financial assurance for post-closure care of that unit unless the Illinois EPA determines that post-closure care has not been in accordance with the approved post-closure plan. The Illinois EPA shall provide the owner or operator with a detailed written statement of any such determination that post-closure care has not been in accordance with the approved post-closure plan.
5. Within 90 days of the modification date of this permit, the permittee shall notify persons on the facility mailing list of the changes to the permit. Within 120 days of the modification date, the permittee shall provided documentation to the Illinois EPA Bureau of Land Permit Section that the required notification was made as specified above. At a minimum, this documentation shall include a copy of the letter sent and a copy of the facility mailing list of all people who received the notification.

F. FINANCIAL ASSURANCE ✓

1. The permittee shall maintain financial assurance for post-closure care of the CAMU of at least \$335,080 (in 2010 dollars). The annual cost estimate for post-closure care, and calculations for the amount of financial assurance required for this facility are shown in Attachment A to this permit. The amount of the post-closure financial assurance shall be sufficient to meet the requirements at 35 Ill. Adm. Code 724.244 and 724.245.
2. The volume of leachate used in the post-closure care cost estimate in Attachment A of this permit shall be based on a 3 year rolling average of the total volume of leachate generated from the CAMU during the previous three years.
3. On or before October 1st of each year the permittee shall submit a permit modification to update the post-closure cost estimate and amount of financial assurance by incorporating the volume of leachate generated in the past year into the 3 year rolling average. The submittal needs to identify the volume of leachate generated in both Phase I and Phase II of the CAMU for each year. The annual amount of leachate generated from the CAMU shall be totaled on September 1st of each year. The leachate data from 2003 through the current year shall be submitted with the permit modification request. A discussion of trends in annual leachate generation totals shall accompany this submittal. This discussion shall identify potential reasons for upward or downward trends and propose any corrective actions or maintenance that might be deemed necessary to optimize the operation of the leachate collection system.

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4. The permittee is allowed to calculate the amount of financial assurance that is required each year by multiplying the number of years remaining in the post-closure care period by the annual post-closure cost estimate that is revised each year per Conditions II.G.2 and G.3 above. If the permittee chooses to modify the financial assurance in this way, a permit modification request to do so must be submitted on or before October 1st of each year with the updated post-closure cost estimate and financial assurance required in Condition II.G.3 above.

G. 39i Certification Forms ✓

1. The permittee is required to complete and provide the following 39i Certification forms to the Illinois EPA Bureau of Land:
 - a. A 39i (legal entity) certification form must be filled out for the legal entity (i.e. Company) that appears on the permit application being submitted, and
 - b. A 39i (individual) form must be filled out for the individual that signs the 39i (legal entity) certification form, and
 - c. A 39i (individual) form must be filled out for each individual who signs the permit application.

Note: If the applicant wants additional staff to be able to send in future modifications, certifications, etc. those individuals should also send in an individual 39i certification form.

2. The permittee shall submit the necessary 39i certification form(s) and supporting documentation within 30 days of any of the following events:
 - a. The owner or operator, or officer of the owner or operator, or any employee who has control over operating decisions regarding the facility has violated federal, State, or local laws, regulations, standards, or ordinances in the operation of waste management facilities or sites; or
 - b. The owner or operator, or officer of the owner or operator, or any employee who has control over operating decisions regarding the facility has been convicted in this or another State of any crime which is a felony under the laws of this State, or conviction of a felony in a federal court; or
 - c. The owner or operator, or officer of the owner or operator, or any employee who has control over operating decisions regarding the facility has committed an act

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of gross carelessness or incompetence in handling, storing, processing, transporting, or disposing of waste.

a. A new person is associated with the owner or operator who can sign the permit application or who has control over operating decisions regarding the facility, such as a corporate officer or a delegated employee.

The 39i certification must describe the violation(s), convictions, carelessness, or incompetence as outlined in (a), (b), or (c) above and must include the date that a new person as described in (d) above began employment with the applicant.

The 39i certification form and supporting documentation shall be submitted to the address specified below:

Illinois Environmental Protection Agency
Bureau of Land #33 – 39i Certification
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

[The 39i certification forms will be treated as confidential by the Agency. The applicant may also request the information on the 39i certification form be maintained confidential in accordance with 2 IAC 1828.]

H. SPECIAL CONDITIONS

The Permittee must submit a legal description of the property to be inserted into the application within 60 days of the effective date of this permit.

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SECTION III

GROUNDWATER CORRECTIVE ACTION PROGRAM

A. SUMMARY

Hazardous waste constituents have been detected in groundwater monitoring wells, at the MPC facility, in the vicinity of HWMUs and SWMUs above the groundwater protection standard and background values. Therefore, a corrective action program meeting the requirements of 35 Ill. Adm. Code 724.200 must be implemented at the MPC facility in Freeport, Illinois.

The groundwater corrective action program required by this Permit includes:

1. The construction of the CAMU which serves as the corrective action and subsequently the basis for the establishment of the Groundwater Management Zone (GMZ).
2. Determining the quality of groundwater, within the GMZ and in the vicinity of the MPC facility, by comparing analytical results for the specified hazardous constituents to the concentration limits that comprise the groundwater protection standard.
3. Evaluating the effectiveness of the corrective action based on the quality of groundwater within the GMZ and in the vicinity of the MPC facility.
4. The postponement of the establishment and monitoring of the point of compliance until the monitoring wells in the program have attained the applicable concentration limits that comprise the groundwater protection standard and the GMZ expires. The compliance period (post-closure period) during which the groundwater protection standard applies shall be extended until it can be demonstrated that the groundwater protection standard has not been exceeded at the point of compliance for three consecutive years.

B. DEFINITIONS

As used herein, the words or phrases set forth below shall have the following definitions:

1. "Uppermost Aquifer" refers to the geologic formation nearest the natural ground surface that is an aquifer, as well as lower aquifers that are hydraulically connected with this aquifer in the vicinity of the facility. The uppermost aquifer in the vicinity of

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the MPC facility has been identified as the unconsolidated aquifer consisting of permeable alluvial sand and gravel.

2. "GMZ" refers to the three (3) dimensional region containing groundwater being managed to mitigate impairment caused by the release of contaminants from a site.
3. "Point of Compliance" refers to the vertical surface located at the hydraulically down-gradient limits of the waste management area (the CAMU) extending down into the uppermost aquifer underlying the regulated unit.
4. "Ft – bgs" refers to the number of feet below the ground surface.
5. "Ft-MSL" refers to the number of feet below the ground surface referenced to mean sea level.
6. "Detected" shall mean a concentration equal to or above the PQL listed in USEPA's SW-846 (Third Edition) for the applicable analytical methods specified in the approved Sampling and Analysis Procedures, which are incorporated by reference in Condition III.H of the Permit.
7. "Progressive Increase" shall mean an increase in the concentration of a constituent in successive sampling events.
8. "Stick-up" refers to the height of the reference survey datum. This point is determined within ± 0.01 foot in relation to mean sea level, which in turn is established by reference to an established National Geodetic Vertical Datum.
9. "Compliance period" is the number of years equal to the active life of the waste management area, including any waste management activity prior to permitting, and the closure period.

C. IMPLEMENTATION

1. The Permittee shall carry out the corrective action monitoring program specified in this Permit on the groundwater beneath the MPC facility in Freeport, Illinois. The uppermost aquifer in the vicinity of the MPC facility has been identified as the unconsolidated aquifer consisting of permeable alluvial sand and gravel.
2. Groundwater monitoring wells at the facility are identified as A through E, referring to the specific screened intervals. These are:

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- A: Screened in the water table in the upper portion of the unconsolidated materials
- B: Screened in the lower portion of the unconsolidated materials
- C: Screened at the surface of the dolomite aquifer
- D: Screened 20 feet (ft) into the dolomite
- E: Screened 40 ft into the dolomite

For the purposes of this Permit and in accordance with 35 Ill. Adm. Code Part 620 regulations: (1) the unconsolidated materials have been designated Class II: General Resource Groundwater; and (2) the dolomite aquifer has been designated Class I: Potable Resource Groundwater. The analytical results obtained from these groundwater monitoring wells shall be compared to the appropriate Class I or Class II concentration limits that comprise the groundwater protection standard found in Condition III.E.1.

4. At this time, the establishment of the point of compliance will be postponed until such time that the monitoring wells at the facility have attained the applicable concentration limits that comprise the groundwater protection standard found in Condition III.E.1 and the GMZ expires. At that time, MPC must submit a proposal for the establishment of a point of compliance which satisfies the regulatory requirements found in 35 Ill. Adm. Code 724, Subpart F and reflects the current conditions at the facility.

D. WELL LOCATIONS AND CONSTRUCTION

1. The Permittee shall maintain the groundwater monitoring wells identified in the table below to allow for the collection of groundwater samples. The location of these wells is specified in Figure C-5 of the approved permit application.

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<u>IEPA Well No.</u>	<u>MPC Well No.</u>	<u>Well Depth (ft-bgs)</u>	<u>Well Depth Elevation (ft MSL)</u>	<u>Well Screen Interval (ft MSL)</u>
------------------------------	-----------------------------	------------------------------------	--	--

"A" Groundwater Monitoring Wells

G06S	MW-6A V	11.6	742.1	747.1 - 742.1
G07S	MW-7A V	13.1	740.7	745.7 - 740.7
G08S	MW-8A V	17.0	741.7	746.4 - 741.4
G09S	MW-9A I	22.3	746.8	755.8 - 745.8
G10S	MW-10A I	21.1	744.0	753.8 - 743.8
G11S	MW-11A	13.2	742.0	747.7 - 742.7
G12S	MW-12A I	12.6	741.1	746.6 - 741.6
G13S	MW-13A I	12.0	741.1	745.9 - 740.9
G14S	MW-14A I	19.8	738.3	751.6 - 741.6
G15S	MW-15A I	12.5	743.7	749.1 - 744.1
G17S	MW-17A	16.7	739.8	743.8 - 738.8
G18S	MW-18A	11.7	743.9	743.6 - 738.6
G19S	MW-19A	14.7	740.6	745.7 - 740.7
GA1S	MW-21A I	24.4	748.0	757.2 - 747.2
GA2S	MW-22A I	24.6	748.8	758.4 - 748.5

"B" Groundwater Monitoring Wells

G06U	MW-6B	25.7	728.9	737.5 - 727.5
G07U	MW-7B	27.3	726.5	736.2 - 726.2
G12U	MW-12B V	27.4	727.9	735.6 - 725.6
G13U	MW-13B V	27.6	725.5	734.8 - 724.8
G14U	MW-14B V	22.2	736.7	741.6 - 736.6
G15U*	MW-15B*VI	28.5	727.8	734.6 - 724.6
G17U*	MW-17B*VI	37.4	719.3	729.3 - 719.3
G18U*	MW-18B*VI	38.3	717.0	727.3 - 717.3
G19U	MW-19B VI	37.7	717.7	727.9 - 717.9
GA3U	MW-23B VI	20.4	734.6	745.0 - 735.0

"C" Groundwater Monitoring Wells

G05M	MW-5C V	23.6	755.2	760.1 - 755.1
G06M	MW-6C V	43.0	711.4	715.9 - 710.9
G07M	MW-7C	34.4	719.6	718.3 - 713.3
G08M	MW-8C V	75.2	681.8	687.7 - 682.7

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G11M	MW-11C V	65.5	689.5	693.8 - 688.8
G12M	MW-12C	52.9	701.0	705.6 - 700.6
G13M	MW-13C	84.4	669.0	674.0 - 669.0
G14M	MW-14C V	80.5	678.4	683.3 - 678.3
G15M*	MW-15C*VI	103.8	652.2	657.7 - 652.7
G16M*+	MW-16C*+VI	29.0	752.6	764.6 - 754.6
G17M*	MW-17C*VI	108.6	647.9	653.0 - 648.0
G19M*	MW-19C*VI	111.3	644.1	650.6 - 644.6
GA0M	MW-20C I	25.6	741.6	742.3 - 752.3
GA1M	MW-21C	54.5	718.4	772.5 - 717.5
GA2M	MW-22C	58.6	715.6	718.5 - 713.5
GA3M*	MW-23C*VI	34.7	720.3	725.9 - 720.9

"D" Groundwater Monitoring Wells

G05L	MW-5D I	38.6	739.9	749.5 - 739.5
G07L	MW-7D V	50.3	703.5	713.3 - 703.3
G17L*	MW-17D*VI	121.0	635.4	644.8 - 634.8
G18L*	MW-18D*VI	148.0	607.1	615.0 - 608.0
G19L*	MW-19D*VI	150.9	604.3	616.7 - 604.7

"E" Groundwater Monitoring Wells

G11D	MW-11E	100.1	655.0	665.8 - 655.8
G12D	MW-12E	87.5	666.2	676.3 - 666.3
G13D	MW-13E	110.7	642.5	645.8 - 635.8
G14D	MW-14E	111.1	647.7	654.7 - 644.7

River Sampling Points

S201	PR-1 VI	NA	NA	NA
S102	PR-2 ⁺ VI	NA	NA	NA

Notes:

1. + - Denotes Upgradient Well
2. * - Denotes GMZ Wells
3. V - Analysis of Volatile Organic Compounds listed in Condition III.E.1
4. I - Analysis of Inorganic constituents listed in Condition III.E.1
5. NA - Not applicable

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2. Construction of each monitoring well/piezometer must be in accordance with the diagram contained in Attachment C to this Permit or details and diagrams approved by the Illinois EPA. All new monitoring wells/piezometers to be installed must be continuously sampled and logged on Illinois EPA boring logs as shown in Attachment C unless otherwise approved by the Illinois EPA.
3. The Permittee shall notify the Illinois EPA within thirty (30) days in writing if any of the wells identified in Condition III.D.1 are damaged or the structural integrity has been compromised. A proposal for the replacement of the subject well shall accompany this notification. The well shall not be plugged until the new well is on-line and monitoring data has been obtained and verified, unless the well is extremely damaged or would create a potential route for groundwater contamination. Prior to replacing the subject well, the Permittee shall obtain written approval from the Illinois EPA regarding the proposed installation procedures and construction.
4. Should any well become consistently dry or unserviceable, a replacement well shall be provided within ten (10) feet of the existing well. This well shall monitor the same zone as the existing well and be constructed in accordance with the current Illinois EPA groundwater monitor well construction standards at the time that the well is replaced. A replacement well which is more than ten (10) feet from the existing well or which does not monitor the same geologic zone must be approved by the Illinois EPA and designated as a new well.
5. The Permittee shall submit boring logs, construction diagrams, and data sheets from installation and development of a new or replacement well to the Illinois EPA at the address below within thirty (30) days of the date that the installation of the well is completed. In addition, the Permittee shall submit certification that plugging and abandonment of a well was carried out in accordance with the approved procedures to the Illinois EPA at the address below within thirty (30) days of the date that the well is plugged and abandoned. All information should be submitted to the appropriate State Agencies.

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

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- ✓ 6. All wells/piezometers shall be equipped with protective caps and locks. Monitoring wells or piezometers located in high traffic areas must be protected with bumper guards.
- ✓ 7. All groundwater monitoring wells and piezometers not utilized in the approved groundwater monitoring system, but retained by the facility, must be constructed and maintained in accordance with 77 Ill. Adm. Code 920 regulations. Monitoring wells and piezometers that are improperly constructed must be abandoned in accordance with Condition III.D.3.

E. GROUNDWATER PROTECTION STANDARD ✓

- 1. The following hazardous constituents and concentration limits comprise the groundwater protection standard in the vicinity of the MPC facility. (Total (unfiltered) values, derived from the applicable USEPA SW-846 (Third Edition) method, will be used for comparison with the concentration limits)

<u>Field Parameters</u>	<u>Storet</u>	<u>Units</u>
pH	00400	
Specific Conductance	00094	micromos/cm
Temperature of Water Sample	00011	(°F)
Turbidity	45626	Ntus
Depth to Water (below land surface)	72019	Feet
Depth to Water (below measuring point)	72109	Feet
Elevation of Groundwater Surface	71993	Ft MSL
Elevation of Bottom of Well #	72020	Ft MSL
Elevation of Measuring Point (Top of casing) ##	72110	Ft MSL

- # Shall be determined during the second sampling event each year
- ## Shall be surveyed once every five (5) years, or at the request of the Illinois EPA, or whenever the elevation changes as required by Condition III.J.5.

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Hazardous Waste Constituents	Storet Number	Groundwater Concentration Limits (mg/l)[#]	
		Class I	Class II
<u>Volatile Organic Compounds</u>			
Tetrachloroethylene	34475	0.005	0.025
Trichloroethene	39180	0.005	0.025
Cis-1,2-Dichloroethene	77093	0.07	0.2
Vinyl Chloride	39175	0.002	0.01
<u>Inorganics (Totals)</u>			
Cadmium	01027	0.005	0.05
Chromium	01034	0.1	1.0
Lead	01051	0.0075	0.1
Nickel	01067	0.1	2.0

Hazardous Waste Constituents	Storet Number	Surface Water Quality Standards for the Pecatonica River (mg/l)^{#, 1, 2}		
		Acute	Chronic	Human Health
<u>Volatile Organic Compounds</u>				
Tetrachloroethylene	34475	1.2	0.15	None
Trichloroethene	39180	12	0.94	0.025
Cis-1,2-Dichloroethene	77093	14*	1.1*	None*
Vinyl Chloride	39175	22	1.7	0.002
<u>Inorganics (Totals)</u>				
Cadmium	01027	0.0371	0.0029	None
Chromium	01034	4.5824	0.5462	None
Lead	01051	0.4325	0.0907	None
Nickel	01067	0.2249	0.0136	None

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Notes: # = milligrams per liter

* = Illinois EPA Bureau of Water (BOW) established values for
1,2-dichloroethylene applicable to cis,1-2-dichloroethene.

1 = 35 Ill. Adm. Code 302.208(e) contains values for inorganics.

2 = 35 Ill. Adm. Code 302.210, Subpart F contains values for organics.

2. Alternate concentration limits may be established where the Permittee can determine a constituent will not pose a substantial hazard to human health or the environment.
 - a. Where a hazardous constituent has a standard in 35 Ill. Adm. Code 620, the facility must apply for an adjusted standard as outlined in Section 28.1 of the Environmental Protection Act.
 - b. For those hazardous constituents without a 35 Ill. Adm. Code 620 standard, the alternative concentration limits proposed by the facility must be approved by the Illinois EPA.
3. The compliance period (post-closure period) during which the groundwater protection standard applies shall be extended until the Permittee demonstrates that the groundwater protection standard has not been exceeded at the point of compliance for three consecutive years.

F. CORRECTIVE ACTION PROGRAM

The Permittee shall conduct the corrective action program and perform groundwater monitoring detailed in this section, in accordance with the following:

1. The GMZ shall be monitored and maintained. The GMZ is delineated by the designated groundwater monitoring wells found in Condition III.D.1.
 - a. The results of monitoring the GMZ shall be submitted to the Illinois EPA semi-annually in accordance with the schedule found in Condition III.J.2.
 - b. The GMZ expires when all groundwater monitoring wells within the GMZ have attained the appropriate Class I or Class II concentration limits that comprise the groundwater protection standard found in Condition III.E.1.
 - i. The appropriate Class I or Class II concentration limits shall be considered attained when groundwater monitoring results meet the appropriate concentration limit for two (2) consecutive years.

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6. In order for the GMZ to remain in effect, the facility shall submit a determination within ninety (90) days of the effective date of the Renewal Permit to address the continued groundwater exceedances of Class I GQSs at well MW-20C. The determination must be submitted as a Class 1* modification request and include proposals for additional investigation or corrective action if determined to be necessary to meet 35 Ill. Adm. Code Part 620 regulations.

✓ **G. GROUNDWATER ELEVATIONS**

1. The Permittee shall determine the groundwater surface elevation referenced to MSL at each well each time groundwater is sampled in accordance with Condition III.J.3.
2. The Permittee shall determine the surveyed evaluation of the "stick-up" referenced to MSL once every five (5) years, or at the request of the Illinois EPA, or whenever the elevation changes in accordance with Condition III.J.5.
3. Elevation, as referenced to MSL, of the bottom of each monitoring well (Storet 72020) is to be reported at least annually. The mandatory measurement shall be taken during the second semi-annual sampling event each year.

H. SAMPLING AND ANALYSIS PROCEDURES

The Permittee shall use the techniques and procedures described in Section C.8.4.3 of the approved permit application, except as modified below, when obtaining and analyzing samples from the groundwater monitoring wells described in Condition III.D.1 above:

1. Samples shall be collected by the techniques described in Section C.8.4.3 of the approved permit application.
2. Samples shall be preserved, shipped, and handled in accordance with the procedures specified in Section C.8.4.3 of the approved permit application.
3. Samples shall be analyzed according to the procedures specified in Section C.8.4.3 of the approved permit application and/or USEPA's SW-846 Methods (latest version).
4. Samples shall be tracked and controlled using the chain of custody procedures specified in Section C.8.4.3 of the approved permit application.

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I. STATISTICAL METHODS

1. The Permittee shall evaluate the results of the analyses required by Condition III.F.3 above and identify:
 - a. The concentration of any organic constituent detected which is equal to or greater than the appropriate concentration limit listed in Condition III.E.1.
 - b. The concentration of any total (unfiltered) inorganic constituent detected which is equal to or greater than the appropriate concentration limit listed in Condition III.E.1.
 - c. The concentration of any constituent detected which was not detected during the previous sampling event.
 - d. The concentration of any constituent which exhibits a progressive increase over two (2) consecutive sampling events.

J. REPORTING AND RECORDKEEPING

1. The Permittee shall enter all monitoring, testing and analytical data obtained in accordance with Conditions III.E, III.F, III.G, and III.I in the operating record.
2. Samples collected to meet the requirements of the groundwater monitoring program described in Conditions III.E, III.F, III.G, and III.I shall be collected and reported, as identified in the table below. The result of the analyses conducted on the groundwater quality samples shall be submitted in accordance with this schedule. All additional data collected for the groundwater monitoring program (as specified in Conditions III.E, III.F, III.G, and III.I) shall also be submitted to the Illinois EPA in accordance with this schedule.

<u>Samples to be Collected During the Months of</u>	<u>Results Submitted to the Illinois EPA by the Following</u>	<u>Constituents</u>
First Quarter	April 15	III.E.1
Third Quarter	October 15	III.E.1

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3. Groundwater surface elevation data, measured pursuant to Condition III.G.1 shall be collected at least semi-annually and submitted to the Illinois EPA as identified in the table above.
4. The Permittee shall report the groundwater flow rate and direction in the uppermost aquifer, as required by Condition III.F.5 during the second semi-annual sampling event of each year.
5. The Permittee shall report the surveyed elevation, as required by Condition III.G.2, of the top of the well casing ("stick-up"), referenced to MSL, in accordance with the following schedule:
 - a. For wells identified in Condition III.D.1 above, every five years (during the second sampling event), or at the request of the Illinois EPA, or whenever the elevation changes. The initial "re-survey" of these wells shall be conducted during the second semi-annual sampling event following the effective date of the Permit.
 - b. For any new wells, at the time of installation and reported in the as-built diagrams. Subsequent measurements shall be made every five years (during the second quarter sampling event) or whenever the elevation changes.
6. Elevation of the bottom of each monitoring well identified in Condition III.D.1, referenced to MSL, is to be reported annually. This measurement shall be taken during the second quarter sampling event. (Storet 72020)
7. The Permittee shall submit a completed "RCRA Facility Groundwater, Leachate and Gas Reporting Form" (LPC 592) as a cover sheet for any notices or reports required by the Permit for identification purposes. Only one copy of the LPC 592 must accompany your submittal. However, the Permittee must submit one (1) original and (excluding the groundwater and leachate monitoring results submitted in an electronic format) a minimum of two (2) of each notice or report you submit to the Illinois EPA. The form is not to be used for Permit modification requests.
8. Information required by Conditions III.J.2, III.J.3, III.J.5, and III.J.6 shall be submitted in an electronic format. The information is to be submitted as fixed-width text files formatted as found in Attachment C in accordance with the schedule found in Condition III.J.2. Additional guidance regarding the submittal of information in an electronic format can be found at www.epa.state.il.us/land.

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9. Statistical evaluations, as required by Condition III.I.1, shall be submitted to the Illinois EPA as a part of the first and third quarter reports as identified in Condition III.J.2.
10. The Permittee shall report all information to the Illinois EPA in a form that can be easily reviewed. All submittals must contain tables of data, drawings, and text (as necessary) to accurately describe the information contained in the submittal.
11. The Permittee shall submit a written report to the Illinois EPA, in accordance with the schedule found in Condition III.J.2 above, which discusses the effectiveness of the corrective action program.

✓ **K. REQUEST FOR PERMIT MODIFICATION**

1. If the Permittee determines that the corrective action monitoring program no longer satisfies the requirements of 35 Ill. Adm. Code 724.200, then within ninety (90) days, the Permittee must submit an application for a permit modification to the Bureau of Land of the Illinois EPA to make any appropriate changes to the program which will satisfy the regulations.
2. Conditions in this section of the Permit may be modified in accordance with 35 Ill. Adm. Code 705.128 if there is cause for such modification, as defined in 35 Ill. Adm. Code 702.184. Causes for modification identified in this section include, but are not limited to, alterations to the permitted facility, additional information that would have justified the application of different permit conditions at the time of issuance, and new regulations.

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SECTION IV

CORRECTIVE ACTION ON HAZARDOUS WASTE AND SOLID WASTE MANAGEMENT UNITS

✓ A. INTRODUCTION

In accordance with Section 3004 of RCRA and 35 Ill. Adm. Code 724.201, the Permittee, Modern Plating Corporation, shall institute such corrective action as necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents, listed in 35 Ill. Adm. Code 721 Appendix H and any solid waste management unit at its facility in Freeport, Illinois.

1. Modern Plating Corporation (MPC) has addressed soil and groundwater contamination associated with RCRA closure and/or corrective action needed at the MPC facility.
 - a. On May 7, 2009 Illinois EPA approved a Closure Documentation Report that addressed closure of the following hazardous waste management units (HWMUs): (1) the CAMU; (2) Lagoons 1, 2, 3 and: (3) the Shawnee Building. The approved closure documentation report also addressed completion of corrective action at the following solid waste management units (SWMUs) and/or areas of concern (AOCs): (1) Lagoons 0 and 1A; (2) Cyanide Treatment Vault; (3) the Wetlands; (4) Outfall Pipe; and (5) Wastewater Release Area. Attachment IV-1 Location of SWMUs and AOC, shows the location of these units within the facility.
 - b. Groundwater at the facility is being addressed under the requirements of Section IV of this permit.
2. The Permittee must provide corrective action, as appropriate, for any newly-identified SWMUs discovered at the facility.
3. The requirements of 35 Ill. Adm. Code, Subtitle G: Waste Disposal and 35 Ill. Admin. Code 620 Objectives (TACO) must be met in carrying out all aspects of the RCRA corrective action program at this facility.

B. COMPLETED REMEDIAL ACTIVITIES

Remediation activities for the four HWMUs (Lagoon 1 Lagoon 2, Lagoon 3, the Shawnee Building); four SWMUs (Lagoon 0, Lagoon 1A, Cyanide Treatment Vault and Wetlands

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Areas) and two Areas of Concern (the Outfall Pipe and Wastewater Release Area) were performed in accordance with the final RCRA closure plan dated December 2, 1999 and subsequent modifications. A CAMU was established at the former location of Lagoons 2 and 3 for the placement of contaminated soil generated by remediation activities MPC in accordance with this permit. Remediation efforts were performed as described in the July 2001 CAMU Landfill Construction Documentation Report and the final August 2001 Closure Documentation Report identified in Condition IV.A.1 above (both these documents were approved by Illinois EPA on May 7, 2009). A summary of the completed activities follows.

- ✓ 1. **Lagoon 0, Lagoon 1, Lagoon 1A, Lagoon 2, Lagoon 3**
 - a. Waste sludges in the lagoons were dried, solidified and/or treated. After removal of waste, at least 1 foot of the base and 1 foot of the interior side slopes were excavated. Additional excavation occurred at the lagoons shown in Attachment IV-I and as described in the summary table provided in Attachment IV-II. The table summarizes for each lagoon, the type of wastes removed, the remedial removal and excavation activities and the remediation quantities.
 - b. The sludge/soil removal effort described above first started in Lagoons 2 and 3. The removed sludge/soil was temporarily placed in one of the other lagoons. Once the sludge/soil was removed from Lagoons 2 and 3, a CAMU was constructed within the footprint of these lagoons. The excavated sludge/soil from the lagoons was placed in the CAMU.
 - c. The concentrations of contaminants remaining (if any) in the soil left in-place were reported in the Modern Plating CAMU Landfill Construction Document Report dated July 2001, Table 5.1.
 - d. After waste was removed from Lagoons 0, 1 and 1A, each area was backfilled with clean soils compacted in lifts and the surface graded to drain.
 - e. A Groundwater Management Zone (GMZ) was established to address contaminated groundwater at the MPC facility. The requirements for the GMZ are specified in Section III of this permit.
2. **Cyanide Treatment Vault Area**
 - a. In the Cyanide Treatment Vault Area, 2 feet of contaminated soil was excavated from the floor and sidewalls of the former vault (approximately 200 cubic yards) and placed in the CAMU.

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- b. After excavation activities, soil samples were obtained in the lagoon areas and Cyanide Treatment Vault Area to define the amount of residual contamination.
- c. After waste was removed, this area was backfilled with clean soil, compacted in lifts and the surface graded to drain.
- d. An engineered barrier was placed over these areas.

✓ 3.

Shawnee Building

Three areas at the Shawnee Building were used for storage of hazardous waste. As part of closure, an estimated 30 cubic yards of contaminated soil were removed and placed in the on-site CAMU. This remedial action achieved the remedial objectives and met the closure requirements of 35 Ill. Adm. Code 725 Subpart G. After waste was removed, this area was backfilled with clean soil compacted in lifts and the surface graded to drain.

✓ 4.

Wetland Area

Approximately 2,905 cubic yards of contaminated soils were removed from four areas in the Wetland Area and placed in the on-site CAMU. Wetland 1 and 1A are off-site in the low area northeast of monitoring well MW-13 and Lagoon 1A. Wetland II and Wetland III are located on-site immediately north of Lagoon 2. Additional excavation occurred in the areas shown in Attachment IV-1 and described in Attachment IV-II. The remedial action achieved the remedial objectives and met the requirements of 35 Ill. Adm. 724.201. The wetland areas were returned to their previous grade by backfilling. No further action is necessary in the Wetland Area.

✓ 5.

Outfall Pipe

An abandoned outfall pipe from the wastewater treatment plant (WWTP) to the Pecatonica River was investigated as a result of a condition in Illinois EPA's December 2, 1999 closure plan approval letter. The investigation led to the excavation of an area 30 feet long, 10 feet wide and 10 feet deep. Contaminated soil from this area was placed in the CAMU. Remediation efforts were determined to be adequate in Illinois EPA's August 8, 2000 letter with the condition that an institutional control be placed restricting future land use at the facility to commercial/industrial activities.

✓ 6.

Wastewater Release

During construction of the CAMU, a pipeline that transfers wastewater from the manufacturing plant to the WWTP ruptured (IEMA Incident No. 20001377). Approximately 3 cubic yards of soil were contaminated as a result of the spill and

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contaminated soil was removed and placed in the CAMU. Remediation efforts were determined to be adequate to address this incident.

C. Environmental Land Use Control (ELUC) Requirements

The Modern Plating facility in Freeport, Illinois (PIN 14-32-251-011; 14-32-276-001; 14-32-402-004; 14-32-426-003; 14-32-402-019) is subject to an Environmental Land Use Control recorded with the Stephenson County Clerk/Recorder on June 1, 2010 as Document Number 201000111587. A drawing showing the boundary of the ELUC is provided in Attachment IV-III. This ELUC shall apply in perpetuity to the facility and shall not be released until: (1) Illinois EPA determines that there is no longer a need for this ELUC; (2) Illinois EPA, upon written request from the property owner and in accordance with 35 Ill. Adm. Code 742.1010, issues an amended certification of closure or a permit modification approving modification/elimination of the ELUC requirements; and (3) a release or modification of the ELUC is filed on the chain of title for the Property.

1. The filed ELUC places the following restrictions on the subject facility:
 - a. The facility may only be used for commercial/industrial activities in the future;
 - b. An engineered barrier must be maintained over the Cyanide Treatment Vault, the Outfall Piping Area and Lagoons 0, 1, 1A, 2 and 3;
 - c. The groundwater under the facility may not be used as a potable supply of water;
 - d. A site safety plan meeting the requirements of 29 CFR 1910 and 1926 must be developed and implemented any time construction/excavation work takes place beneath the engineered barriers mentioned above;
 - e. Any soil removed from beneath the engineered barriers mentioned above must be properly managed in accordance with 35 Ill. Admin. Code, Subtitle G: Waste Disposal.
2. Failure to comply with the limitations or requirements of an ELUC may result in avoidance of an Agency no further remediation determination in accordance with the program under which the determination was made. The failure to comply with the limitations or requirements of an ELUC may also be grounds for an enforcement action pursuant to Title VIII of the Illinois Environmental Protection Act.

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3. The limitations or requirements of the ELUC apply in perpetuity or until:
 - a. The Illinois EPA issues a new no further remediation determination approving modification or removal of the limitation/requirement; and
 - b. A release or modification of the land use limitation is filed on the chain of title for the property that is the subject of the ELUC.
4. At no time shall this site be used in a manner inconsistent with the land use limitations established in the approved ELUC, unless: (1) attainment of objectives appropriate for the new land use is achieved, and (2) a new no further action determination is obtained from Illinois EPA and subsequently recorded in accordance with 35 Ill. Adm. Code 742.
5. Requests to release or modify an ELUC must be formally requested in writing from Illinois EPA as a: (1) request to amend the certification of closure; or (2) a permit modification request. Sufficient information must be provided in these requests to demonstrate that the requested change meets all the requirements of 35 IAC 742.
6. Corrective action activities at the subject facility must continue to be carried out in accordance with: (1) 35 Ill. Admin. Code 724.201; (2) the facility's RCRA permit; and (3) Illinois EPA letters regarding the activities.

D. FUTURE RELEASES FROM SWMUs

- ✓ 1. The Permittee shall notify the Illinois EPA in writing of any newly-identified SWMU(s) discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than sixty (60) calendar days after discovery. This requirement of this section is in accordance with 35 Illinois Admin Code 724.201-Corrective Action for Solid Waste Management Units. Additional corrective action investigation may be required at a later date should new information or additional analysis indicate that there is or may be a release from a SWMU that poses a threat to human health and the environment. The notification shall provide the following information, as available:
 - a. The location of the newly-identified SWMU in relation to other SWMUs on a scaled map or drawing;
 - b. The type and past and present function of the unit;

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- c. The general dimensions, capacities, and structural description of the unit (available drawings and specifications provided);
 - d. The period during which the unit was operated;
 - e. The specifics on all materials, including but not limited to, wastes and hazardous constituents, that have been or are being managed at the SWMU, to the extent available; and
 - f. The results of any relevant available sampling and analysis which may aid in determining whether releases of hazardous wastes or hazardous constituents have occurred or are occurring from the unit.
- ✓ 2. If the submitted information demonstrates a potential for a release of hazardous waste or hazardous waste constituents from the newly identified SWMU, the Illinois EPA may request in writing, that the Permittee prepare a Solid Waste Management Unit (SWMU) Assessment Plan and a proposed schedule of implementation and completion of the Plan for any additional SWMU(s) discovered subsequent to the issuance of this Permit.
- ✓ 3. Within 120 calendar days after receipt of the Illinois EPA request for a SWMU Assessment Plan, the Permittee shall submit a SWMU Assessment Plan to Illinois EPA. The plan shall propose investigations, including field investigations if necessary, to determine the release potential to specific environmental media for the newly-identified SWMU. The SWMU Assessment Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify migration of hazardous waste and hazardous constituents from the newly-discovered SWMU(s) to the environment.
- ✓ 4. After the Permittee submits the SWMU Assessment Plan, the Illinois EPA shall approve, approve with conditions, or disapprove the Plan in writing. If the plan is approved, the Permittee shall begin to implement the Plan within forty-five (45) calendar days of receiving such written notification. If the Plan is disapproved, the Illinois EPA shall notify the Permittee in writing of the Plan's deficiencies specify a due date for submittal of a revised plan.
- ✓ 5. The Permittee shall submit a report documenting the results of the approved SWMU Assessment Plan to the Illinois EPA in accordance with the schedule in the approved SWMU Assessment Plan. The SWMU Assessment Report shall

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describe all results obtained from the implementation of the approved SWMU Assessment Plan. Based upon the results of Illinois EPA's review of this submittal, it may be necessary for the Permittee to conduct further investigation, develop final remediation objectives or carry out a corrective measures program.

6. The Permittee must comply with the requirements of Subsection E below relative to the development of cost estimates and establishment of financial assurance.

E. FINANCIAL ASSURANCE FOR CORRECTIVE ACTION

- ✓ 1. The Permittee must prepare a cost-estimate for the completion of any corrective measure(s) required under Subsection D. above in order to provide financial assurance for completion of corrective action, as required under 35 Ill. Code 724.201(b). Such cost-estimate will be based upon the cost of contamination investigations and assessments for SWMUs, and design, construction, operation, inspection, monitoring, and maintenance of the corrective measure(s) to meet the requirements of 35 Ill. Adm. Code 724.201 and this permit. The cost-estimate must be submitted to the Illinois EPA with each submittal required by Subsection D above.
- ✓ 2. Once a cost-estimate has been approved in accordance with Condition E.1 above, the Permittee must demonstrate continuous compliance with 35 Ill. Adm. Code 724.201 by providing documentation of financial assurance using a mechanism specified in 35 Ill. Adm. Code 724.243.
- ✓ 3. Currently, the facility has completed all required corrective action, except for implementation of the groundwater corrective action program required by Section III of this permit. Thus, no financial assurance is necessary unless the Permittee must address a release from a newly-identified SWMU in accordance with Subsection D above.

F. INTERIM MEASURES

At any time during the completion of remedial activities for a newly-identified SWMU, the Permittee may initiate additional interim measures for the purpose of preventing continuing releases and/or mitigating the results of releases and/or mitigating the migration of hazardous wastes or hazardous constituents. It shall not be necessary to conduct all phases of an investigation prior to implementing an interim measure if the Illinois EPA and the Permittee agree that a problem can be corrected, or a release cleaned up, without additional study and/or without a formal Corrective Measure Study.

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1. Prior to implementing any interim measures beyond those specified above, the Permittee must submit detailed information regarding the proposed interim measure to the Illinois EPA for approval. This information shall include, at a minimum:
 - a. Objectives of the interim measures: how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long-term solution at the facility;
 - b. Design, construction, and maintenance requirements;
 - c. Schedules for design and construction; and
 - d. Schedules for progress reports.
2. If the Illinois EPA determines that a release cannot be addressed without additional study and/or a formal CMS, then the Illinois EPA will notify the Permittee that these must be performed. Any proposal made under this provision or any other activity resulting from such proposal, including the invocation of dispute resolution, shall not affect the schedule for implementation of the remedial action plan or of any other portion of the permit.

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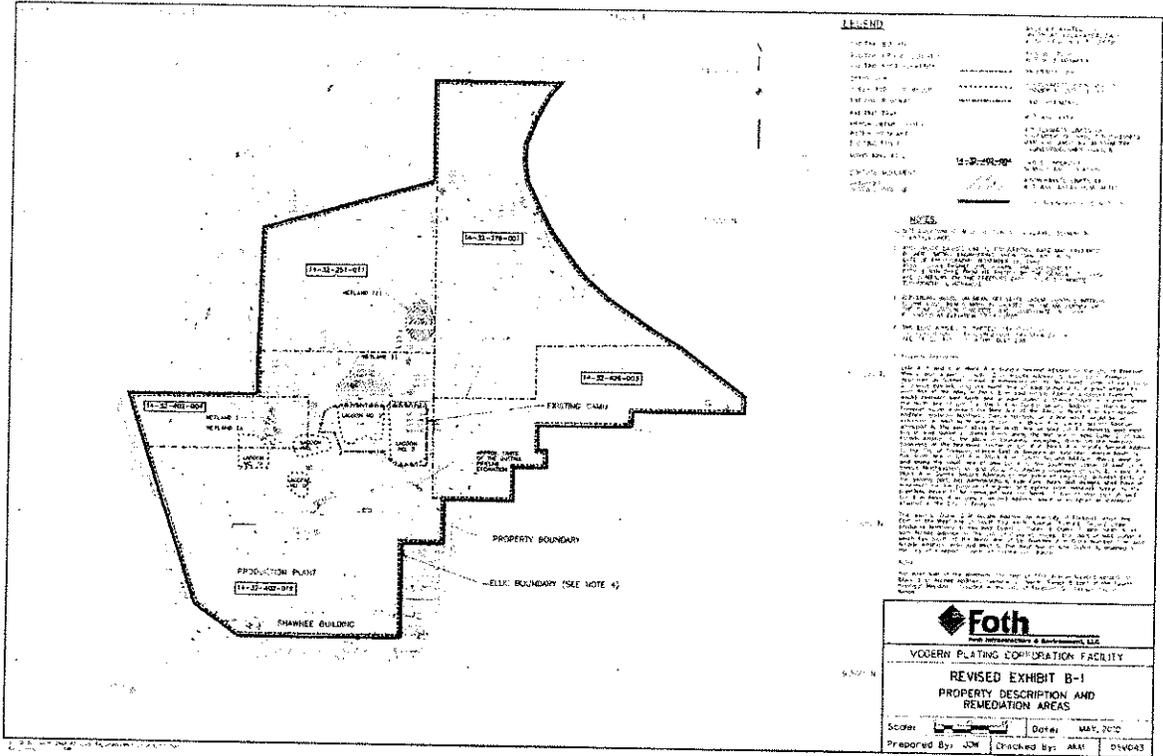
Attachment IV-2

Remediation and Closure of HWMUs and SWMUs

Type of Unit	Year of Operation	Location	Estimated Quantity (in-place)	Description of Additional Remediation Wastes or Contaminated Soil Removed	Description of Waste Type(s) Removed	Additional Soil Removal	Final Cover
HWMU	1971 - 1973	Lagoon 1	3,760 c.y.	Approx. 125 tons of lime kiln dust added to wet sludges	Electroplating Sludge (F006)	Excavated 1 foot below the base and interior sideslopes	~12 feet of compacted clay soil
HWMU	1972 - 1979	Lagoon 2	4,750 c.y.	An additional 1 foot of soil removed from the lagoon bottom	Electroplating Sludge (F006)	Excavated 1 foot below the base and interior sideslopes	CAMU Constructed
HWMU	1980 - 1983	Lagoon 3	4,750 c.y.	Approx. 125 tons of lime kiln dust added to wet sludges	Electroplating Sludge (F006 & F002)	Excavated 1 foot below the base and interior sideslopes	CAMU Constructed
HWMU	1969 - 1970	Lagoon 0	2,880 c.y.	Approx. additional 2,000 c.y. excavated from Lagoon No. 0	Cyanide Sludges, Zinc, Cadmium, and Copper stripping, may contain TCE, sludges treated with oil dry, lime and sand (F006 & F002)	Excavated 1 foot below the base and interior sideslopes	~15 feet of compacted clay soil
SWMU	1973	Lagoon 1A	1,910 c.y.	Approx. additional 70 c.y. removed	Electroplating sludge chemically fixed with Portland cement	Excavated 1 foot below the base and interior sideslopes	~5 feet of compacted clay soil
HWMU	1964 - 1991	Shawnee Building	30 c.y.	N/A	Soils contaminated with metals and TCE	Excavated to 200 mg/kg residual cadmium	~3 feet of compacted clay soil
SWMU	1969 - 1983	Cyanide Vault	200 c.y.	N/A	Concrete vault and cyanide contaminated soils	Excavated 2 feet below the floor and interior sideslopes	~12 feet of compacted clay soil
SWMU	NA	Wetland Soils	2,225 c.y.	Approx. additional 93 c.y. excavated from Wetland 1A and 45 c.y. from Wetland 2	Organic silty clays contaminated with metals	Excavated to 200 mg/kg residual cadmium	~2 feet of wetland soil
	NA	Outfall Pipeline	111 c.y.	Contaminated soil fill & clay soil excavated	Contaminated soil with construction debris and clayey soil	Excavated to 200 mg/kg residual cadmium	~6 feet of compacted clay soil

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SECTION V

SECTION NUMBER : STANDARD CONDITIONS FOR POST-CLOSURE CARE

GENERAL REQUIREMENTS

1. **EFFECT OF PERMIT.** The existence of a RCRA permit shall not constitute a defense to a violation of the Environmental Protection Act or Subtitle G, except for development, modification or operation without a permit. Issuance of this permit does not convey property rights or any exclusive privilege. Issuance of this permit does not authorize any injury to persons or property or invasion of other private rights, or infringement of state or local law or regulations. (35 Ill. Adm. Code 702.181)
2. **PERMIT ACTIONS.** This permit may be modified, reissued or revoked for cause as specified in 35 Ill. Adm. Code 703.270 through 703.273 and Section 702.186. The filing of a request by the Permittee for a permit modification or revocation, or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. (35 Ill. Adm. Code 702.146)
3. **SEVERABILITY.** The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby. (35 Ill. Adm. Code 700.107)
4. **PERMIT CONDITION CONFLICT.** In case of conflict between a special permit condition and a standard condition, the special condition will prevail. (35 Ill. Adm. Code 702.160)
5. **DUTY TO COMPLY.** The Permittee shall comply with all conditions of this permit except for the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of the Environmental Protection Act and is grounds for enforcement action; permit revocation or modification; or for denial of a permit renewal application. (35 Ill. Adm. Code 702.141 and 703.242)
6. **DUTY TO REAPPLY.** If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must apply for a new permit at least 180 days before this permit expires, unless permission for a later date has been granted by the Illinois EPA. (35 Ill. Adm. Code 702.142 and 703.125)

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7. PERMIT EXPIRATION. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 35 Ill. Adm. Code 703.181-703.209) and through no fault of the Permittee the Illinois EPA has not issued a new permit as set forth in 35 Ill. Adm. Code 702.125.
8. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (35 Ill. Adm. Code 702.143)
9. DUTY TO MITIGATE. In the event of noncompliance with the permit, the permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. (35 Ill. Adm. Code 702.144)
10. PROPER OPERATION AND MAINTENANCE. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory, and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit. (35 Ill. Adm. Code 702.145)
11. DUTY TO PROVIDE INFORMATION. The Permittee shall furnish to the Illinois EPA, within a reasonable time, any relevant information which the Illinois EPA may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Illinois EPA, upon request, copies of records required to be kept by this permit. (35 Ill. Adm. Code 702.148)
12. INSPECTION AND ENTRY. The Permittee shall allow an authorized representative of the Illinois EPA, upon the presentation of credentials and other documents as may be required by law, to:
 - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

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- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
 - d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location. (35 Ill. Adm. Code 702.149)
13. MONITORING AND RECORDS. (35 Ill. Adm. Code 702.150)
- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste must be the appropriate method from Appendix A of 35 Ill. Adm. Code 721. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, latest versions; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, latest versions; or an equivalent method as specified in the approved Waste Analysis Plan.
 - b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or application. These periods may be extended by request of the Illinois EPA at any time. The permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well.
 - c. Records of monitoring information shall include:
 - i. The date(s), exact place, and time of sampling or measurements;
 - ii. The individual(s) who performed the sampling or measurements;
 - iii. The date(s) analyses were performed;
 - iv. The individual(s) who performed the analyses;

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- v. The analytical technique(s) or method(s) used; and
 - vi. The result(s) of such analyses. (35 Ill. Adm. Code 702.150)
14. REPORTING PLANNED CHANGES. The permittee shall give written notice to the Illinois EPA as soon as possible of any planned physical alterations or additions to the permitted facility. In general, proposed changes to the facility will need to be submitted to the Illinois EPA as permit modification request that complies with the requirements of 35 Ill. Adm. Code 703.280. (35 Ill. Adm. Codes 702.152(a))
15. CONSTRUCTION CERTIFICATION. For a new hazardous waste management facility, the permittee shall not commence treatment, storage or disposal of hazardous waste; and for a facility being modified the permittee shall not treat, store or dispose of hazardous waste in the modified portion of the facility, until:
- a. The permittee has submitted to the Illinois EPA by certified mail or hand delivery a letter signed by the permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
 - b.
 - 1. The Illinois EPA has inspected the modified or newly constructed facility and finds it is in compliance with the condition of the permit; or
 - 2. If, within 15 days of the date of submission of the letter in paragraph (a), the permittee has not received notice from the Illinois EPA of its intent to inspect, prior inspection is waived and the permittee may commence treatment, storage or disposal of hazardous waste. (35 Ill. Adm. Code 703.247)
16. ANTICIPATED NONCOMPLIANCE. The Permittee shall give advanced written notice to the Illinois EPA of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements, regulations, or the Act. (35 Ill. Adm. Code 702.152(b))
17. TRANSFER OF PERMITS. This permit may not be transferred by the permittee to a new owner or operator unless the permit has been modified or reissued pursuant to 35 Ill. Adm. Code 703.260(b) or 703.272. Changes in the ownership or operational control of a facility must be made as a Class 1 modification with the prior written approval of the Illinois EPA. The new owner or operator shall submit a revised permit application no later than 90 days prior to the scheduled change. (35 Ill. Adm. Code 703.260)

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18. MONITORING REPORTS. Monitoring results shall be reported at the intervals specified in the permit. (35 Ill. Adm. Code 702.152(d))
19. COMPLIANCE SCHEDULES. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than specified in 35 Ill. Adm. Code 702.162. (35 Ill. Adm. Code 702.152(e))
20. TWENTY-FOUR HOUR REPORTING.
 - a. The Permittee shall report to the Illinois EPA any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the following circumstances. This report shall include the following:
 - i. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
 - ii. Information concerning the release or discharge of any hazardous waste or of a fire or explosion at the HWM facility, which could threaten the environment or human health outside the facility.
 - b. The description of the occurrence and its cause shall include:
 - i. Name, address, and telephone number of the owner or operator;
 - ii. Name, address, and telephone number of the facility;
 - iii. Date, time, and type of incident;
 - iv. Name and quantity of material(s) involved;
 - v. The extent of injuries, if any;
 - vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
 - vii. Estimated quantity and disposition of recovered material that resulted from the incident.

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- c. A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times and if the noncompliance has not been corrected; the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Illinois EPA may waive the five day written notice requirement in favor of a written report within fifteen days. (35 Ill. Adm. Code 702.152(f) and 703.245(b))
21. OTHER NONCOMPLIANCE. The Permittee shall report all instances of noncompliance not otherwise required to be reported under Standard Conditions 14, 15, and 16, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in Standard Condition 20. (35 Ill. Adm. Code 702.152(g))
22. OTHER INFORMATION. Where the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Illinois EPA, the Permittee shall promptly submit such facts or information. (35 Ill. Adm. Code 702.152(h))
23. SUBMITTAL OF REPORTS OR OTHER INFORMATION. All written reports or other written information required to be submitted by the terms of this permit shall be sent to:
- Illinois Environmental Protection Agency
Bureau of Land
Planning and Reporting Section - #24
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
24. SIGNATORY REQUIREMENT. All permit applications, reports or information submitted to the Illinois EPA shall be signed and certified as required by 35 Ill. Adm. Code 702.126. (35 Ill. Adm. Code 702.151)
25. CONFIDENTIAL INFORMATION. Any claim of confidentiality must be asserted in accordance with 35 Ill. Adm. Code 702.103 and 35 Ill. Adm. Code 161.
26. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE. The Permittee shall maintain at the facility, until post-closure is complete, the following documents and amendments, revisions and modifications to these documents:
- a. Post-closure plan as required by 35 Ill. Adm. Code 724.218(a) and this permit.

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- b. Cost estimate for post-closure care as required by 35 Ill. Adm. Code 724.244(d) and this permit.
- c. Operating record as required by 35 Ill. Adm. Code 724.173 and this permit.
- d. Inspection schedules as required by 35 Ill. Adm. Code 724.115(b) and this permit.

GENERAL FACILITY STANDARDS

- 27. **GENERATOR REQUIREMENTS.** Any hazardous waste generated at this facility shall be managed in accordance with the generator requirements at 35 Ill. Adm. Code Part 722.
- 28. **SECURITY.** The Permittee shall comply with the security provisions of 35 Ill. Adm. Code 724.114(b) and (c).
- 29. **GENERAL INSPECTION REQUIREMENTS.** The Permittee shall follow the approved inspection schedule. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 35 Ill. Adm. Code 724.115(c). Records of inspections shall be kept as required by 35 Ill. Adm. Code 724.115(d).

PREPAREDNESS AND PREVENTION

- 30. **DESIGN AND OPERATION OF FACILITY.** The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. (35 Ill. Adm. Code 724.131)

RECORD KEEPING

- 31. **OPERATING RECORD.** The Permittee shall maintain a written operating record at the facility in accordance with 35 Ill. Adm. Code 724.173.

POST-CLOSURE

- 32. **CARE AND USE OF PROPERTY.** The Permittee shall provide post-closure care for the facility as required by 35 Ill. Adm. Code 724.217 and in accordance with the approved post-closure plan.
- 33. **AMENDMENT TO POST-CLOSURE PLAN.** The Permittee must amend the post-closure plan whenever a change in the facility operation plans or facility design affects the

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post-closure plan or when an unexpected event has occurred which has affected the post-closure plan pursuant to 35 Ill. Adm. Code 724.218(d).

34. COST ESTIMATE FOR POST-CLOSURE. The Permittee's original post-closure cost estimate, prepared in accordance with 35 Ill. Adm. Code 724.244, must be:
- a. Adjusted for inflation either 60 days prior to each anniversary of the date on which the first closure cost estimate was prepared or if using the financial test or corporate guarantee, within 30 days after close of the firm's fiscal year.
 - b. Revised whenever there is a change in the facility's post-closure plan increasing the cost of closure.
 - c. Kept on record at the facility and updated. (35 Ill. Adm. Code 724.244)
35. FINANCIAL ASSURANCE FOR POST-CLOSURE CARE. The Permittee shall demonstrate compliance with 35 Ill. Adm. Code 724.245 by providing documentation of financial assurance, as required by 35 Ill. Adm. Code 724.251, in at least the amount of the cost estimates required by the previous Permit Condition. Changes in financial assurance mechanisms must be approved by the Agency pursuant to 35 Ill. Adm. Code 724.245.

Financial assurance documents submitted to Illinois EPA should be directed to the following address:

Illinois Environmental Protection Agency
Bureau of Land #24
Financial Assurance Program
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

36. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS. The Permittee shall comply with 35 Ill. Adm. Code 724.248 whenever necessary.

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SECTION VI

REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA permit are summarized below. This summary is provided to highlight the various reporting and notification requirements of this permit.

CONDITION	SUBMITTAL	DUE DATE
CAMU Post-Closure		
II.C.6.h	Submit Results of leachate analysis.	June 1
II.E.2	Notify appropriate state and local officials	Immediately when Contingency Plan is implemented.
II.E.3	Notify appropriate IEMA and IEPA	Within 24 hours of implementing the Contingency Plan.
II.F.3	Certify to the Illinois EPA that post-closure care was performed in accordance with the specifications.	Within 60 days after completion of the post-closure care period.
II.F.5	Notify the people on the facility mailing list of changes to the permit. Submit documentation to IEPA that the notification required above was performed.	Within 90 days of the effective date of the permit. Within 120 days of the effective date of the permit.
II.G.3	Submit an annual permit modification to update the post-closure cost estimate and financial assurance.	October 1
II.G.4	Submit an annual permit modification to revise the amount of financial assurance required. (optional)	October 1
II.H.2	Submit revised 39i certification forms.	Within 30 days of any of the events cited in Condition II.H.2.
Groundwater Monitoring		
III.D.3	Notify IEPA if any of the wells identified in Condition III.D.1 are damaged or the	Within thirty (30) days of the date the damage is

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CONDITION	SUBMITTAL	DUE DATE
	structural integrity has been compromised.	detected.
III.D.5	Provide Illinois EPA boring logs, construction diagrams and data sheets from new or replacement wells.	Within thirty (30) days of the date installation is complete.
III.J.2	Reporting of groundwater monitoring data and statistical calculations are required semi-annually.	April 15 and October 15
III.J.3	Semi-annual groundwater surface elevation data.	April 15 and October 15
III.J.4	Groundwater flow rate and direction in the uppermost aquifer.	October 15
III.J.5	Surveyed elevation of the top of the well casing ("stick-up")	October 15 every 5 years beginning in 2006
III.J.6	Elevation of the bottom of each monitoring well.	October 15
III.K.1	Apply for permit modification to modify the corrective action monitoring program.	Within ninety (90) days of determining the program no longer meets the requirements of 35 Ill. Adm. Code 724.200.
Corrective Action		
IV.C.1	Provide a draft ELUC for the facility.	Within 60 days of the modification date of this permit.
IV.D.1	Notify Illinois EPA in writing of any newly-identified SWMU(s) or release from an existing SWMU.	No later than sixty (60) calendar days after discovery.
IV.D.3	Submit a SWMU Assessment Plan to Illinois EPA.	Within 120 calendar days after receipt of the Illinois EPA request.
IV.D.5	Submit a report documenting the results of the approved SWMU Assessment Plan to the Illinois EPA	In accordance with the schedule in the approved SWMU Assessment Plan.
IV.F.1	Submit detailed information regarding the	Prior to implementing

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CONDITION	SUBMITTAL	DUE DATE
	proposed interim measure to the Illinois EPA for approval.	any interim measures beyond those specified in this permit.
Standard Conditions		
6	Complete application for new permit.	At least 180 days prior to permit expiration.
11	Information requested by Illinois EPA and copies of records required to be kept by this permit.	Reasonable time.
14	Notify Illinois EPA of planned physical alterations or additions.	As soon as possible.
15	Construction Certification	Upon construction of a new or modified unit.
16	Notify Illinois EPA of changes that may result in permit noncompliance.	Prior to the planned change.
17	Application for permit modification indicating permit is to be transferred.	90 days prior to the planned change of ownership.
18	Monitoring reports	The intervals specified in the permit.
19	Submission of any information required in a compliance schedule.	Within 14 days after each schedule date.
20	Report to Illinois EPA any non-compliance that may endanger health or environment. By telephone In writing	Within 24 hours after discovery. Within 5 days after discovery.
21	Report all other instances of noncompliance.	At the time monitoring reports, as required by this permit, are submitted

FIGURES

**Figure 1: Map of Facility With Extent of
Areas Remediated and CAMU Boundaries**

MODERN PLATING CORP

RCRA Post-Closure Permit

IEPA No. ID #1770200010

USEPA ID No. 005172325

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ATTACHMENT A

POST – CLOSURE COST ESTIMATE

MODERN PLATING CORP

RCRA Post-Closure Permit

IEPA No. ID #1770200010

USEPA ID No. 005172325

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Post-Closure Care Cost Estimate
 for
MODERN PLATING CORP

RCRA Post-Closure Permit
 IEPA No. ID #1770200010
 USEPA ID No. 005172325
 Log No. B-167R

6.1

Item / Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
1. Site Inspections and Report (annual) (1 per year)	1 per yr	\$1,000 each	\$1,000
2. Land Surface Care			
◆ Erosion Damage Repair (0.9 cy/acres/yr on 2 acres)	1.8 cy	\$50/cy	\$90
◆ Revegetation and Soil Amendments (Assume 10%/yr x 2.0 acres/yr)	0.2 acres	\$2,500/acre	\$500
◆ Snow Plowing (Assume 2 snowfall events)	2 each	\$200/each	\$400
3. Leachate Treatment ¹	6,461 ³ gal/yr	\$0.02/gal	\$129
4. Leachate Hauling ²	6,461 gal/yr	\$0.20/gal	\$1,292

1770200010
 Modern Plating Corp.
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Page A-2 of A-2

Item / Description	Estimated Quantity	Unit Cost (\$)	Cost (\$)/Year
5. Environmental Monitoring (semi-annually) ♦ Groundwater (8 wells for metals & 14 wells for VOC, 2 times/year) ♦ Leak Detection System (LDS) Monitoring (1 location, 12 times/year) ♦ Leachate Monitoring (1 location, 2 times/year) ♦ Surface water Monitoring (2 locations, 2 times/year)	2 sample events per yr 12 events 2 samples 4 samples	\$4,760/event \$100/event \$140/sample \$40/sample	\$9,520 \$1,200 \$280 \$160
6. Mowing (2 acres per year)	2 acres	\$50/acre	\$100
7. Landfill Sump Pump (Replace each pump every 5 yrs)	12 pumps	\$1,400/pump	\$560 ⁴
Subtotal			\$15,231
Contingency (10%)			\$1,523
Total Cost per Year			\$16,754

¹ Assumes treatment at a publicly owned wastewater treatment and pretreatment at the MPC wastewater treatment plant
² Assumes on-site wastewater treatment plant (WTP) is no longer operating and leachate must be trucked off-site.
³ Leachate volume is the average of the total amount of leachate generated in the last 3 years (2005-2007)
⁴ Prorated to an annual cost over the 30-year long-term care period.

ATTACHMENT B

**POST-CLOSURE
INSPECTION & MAINTENANCE SCHEDULE**

MODERN PLATING CORP

RCRA Post – Closure Permit

IEPA No. ID #1770200010

USEPA ID No. 005172325

Log No. B-167R

Post-Closure Inspection Schedule and Log

**Modern Plating Corporation
 CAMU**

Equipment or Area	Description	Activity Description	Frequency	Date	Time	Comments
Leachate Collection System (LCS)	Side slope Riser (SSR) Pump and Piping	1. Check for leaks.	Annually 5 days after start-up, repair leaks within 15 days. As per manufacturer's O&M manual. As per manufacturer's O&M manual.			
		2. Check for leaks weekly thereafter.				
Leachate Detection System (LDS)		3. Service pumps.	As per manufacturer's O&M manual. As needed for trouble free operation Weekly during active life, monthly after closure. Weekly during active site life; monthly after closure. Monthly record gallons pumped from LCS and LDS for each phase. Refer to 35 IAC 724.403 for frequencies if leakage does not occur. As per manufacturer's O&M manual. Weekly during active site life, monthly after closure.			
		4. Check pressure transducer for proper operation.				
		5. Check flow meter and pump controls for proper operation.				
		6. Clean paddlewheel on liquid flow sensors				
		7. Check alarms and alarm lights for proper operation (press down lights on control panel).				
		1. Check liquid levels and remove liquids above pumping level. Record liquid level and leachate quantity in sump. ¹				
		2. Check liquid levels and remove liquids above pumping level				
3. Check pressure transducers for proper operation.						
		4. Check alarms and alarm lights for proper operation.				

1770200010
 Modern Plating Corp.
 RCRA Log No. B-167R

Post-Closure Inspection Schedule & Log
Modern Plating Co. CAMU

Equipment or Area	Description	Activity Description	Frequency	Date	Time	Comments
Exterior of CAMU Landfill	Berms	<ol style="list-style-type: none"> 1. Check for wet spots and leaks. 2. Check for settlement, slumping or sloughing. 3. Check for erosion and bare sod areas. 	Semiannually			Walk final cover semi-annually.
			Semiannually			Check site rain gauge.
			Semiannually and after each major rainfall event (i.e., greater than 1/2 inch).			
Run-on and Run-Off Control	Erosion Control Devices	<ol style="list-style-type: none"> 1. Riprap-inspection for washout or undercutting. 2. Ditches-inspect for siltation and/or erosion. 3. Erosion bales or silt fencing-inspect for washout or undercutting. 4. Culverts-inspect for washout/siltation at inlet and outlet. 	Quarterly and after each major rainfall event.			Walk ditches and sedimentation basin after rainfall greater than 1/2 inch.
			Quarterly and after each major rainfall event.			
			Quarterly and after each major rainfall event.			
			Quarterly and after each major rainfall event.			
Sedimentation Basins		<ol style="list-style-type: none"> 1. Inspect berms for erosion, scouring and slumping. 2. Inspect pond bottom for build-up of sediment. 3. Inspect inlet and outlet for erosion and sedimentation. 4. Inspect trash rack and rock filter. 	Quarterly and after each major rainfall event.			Inspect after rainfall event greater than 1/2 inch.
			Quarterly and after each major rainfall event.			
			Quarterly and after each major rainfall event.			
			Quarterly and after each major rainfall event.			
Final Cover Surface	Vegetation	<ol style="list-style-type: none"> 1. Inspection for growth and overall health. 2. Evidence of stress. 3. Bare spots from erosion, washout or die-offs, etc. 	Quarterly and after each major rainfall event.			Inspect after rainfall event greater than 1/2/ inch.
			Quarterly and after each major rainfall event.			
			Quarterly and after each major rainfall event.			
Final Cover		<ol style="list-style-type: none"> 1. Erosion resulting in rills, gullies or bare soil. 	Quarterly and after each major rainfall event.			Inspect after rainfall event greater than 1/2 inch.

Post-Closure Inspection Schedule & Log
 Modern Plating Co. CAMU

Equipment or Area	Description	Activity Description	Frequency	Date	Time	Comments
		2. Settlement resulting in loss of grade and/or water standing on the final cover. 3. Slumping or sloughing of final cover.	Quarterly and after each major rainfall event. Quarterly and after each major rainfall event.			
Security Control Devices	Fences, Gates and Locks	1. Inspection for proper function. 2. Replace and repair as required.	Semiannually			
Gas Venting System	Risers	1. Inspect for plugging.	Semiannually			
Groundwater Monitoring Wells	Protective Tops	1. Inspect protective tops and seal for integrity and function.	Semiannually			Record results of annual well inspection.
	Well	2. Record well condition, including well depth, siltation, water depth, well pipe condition and water quality.	Semiannually			
Horizontal and Vertical Control	Benchmarks	1. Check for disturbance and remark (i.e., flag and/or paint).	Annually			
Groundwater Monitoring Wells	Survey	1. Survey stick-up once every five (5) years.	Every five (5) years.			Report during second quarter sampling event.
		2. Report elevation of the bottom of each monitoring well (Storet 72020).	Annually			

¹ To be compared with the action leakage rate of 2,434 gal/day per phase.

Post-Closure Maintenance Plan

**Modern Plating Corporation
 CAMU**

Electronic Filing: Received, Clerk's Office 02/03/2026

Equipment or Area	Description	Preventive Maintenance	Corrective Maintenance Procedures	Equipment Requirements	Material Needs
Leachate Collection System (LCS)	Side Slope Riser (SSR) Pump and Piping	<ol style="list-style-type: none"> 1. Service pumps in accordance with the manufacturer's requirements. 2. Clean pump according to the manufacturer's recommendations. 3. Clean interior piping annually. 4. Inspect liquid level sensor as per manufacturer's O&M manual. 	<ol style="list-style-type: none"> 1. Refer to O&M manual. 2. Repair leaks immediately after they are observed. 	<ol style="list-style-type: none"> 1. Refer to O&M Manual. 2. Refer to O&M Manual. 	Refer to O&M Manuals
Leachate Detection System (LDS)		<ol style="list-style-type: none"> 1. Service pumps in accordance with the manufacturer's requirements. 2. Clean pump according to the manufacturer's recommendations. 3. Clean interior piping annually. 4. Inspect liquid level sensor as per manufacturer's O&M manual. 	<ol style="list-style-type: none"> 1. Refer to O&M manual. 2. Repair leaks immediately after they are observed. 	<ol style="list-style-type: none"> 1. Refer to O&M Manual. 2. Refer to O&M Manual. 	Refer to O&M Manuals
Final Cover	Surface Water Management System	<ol style="list-style-type: none"> 1. Clean culverts of debris. 	<ol style="list-style-type: none"> 1. Correct erosion problems by installing erosion control devices. 1. Fill settled areas and grade to drain. 2. Revegetate filled areas. 	Truck, bobcat, shovel.	Erosion mat, riprap, topsoil, etc.
	Cover Settlement		<ol style="list-style-type: none"> 1. Repair eroded areas by filling with soil to grading and adding erosion mat prior to seeding. 2. Seed, fertilize and mulch. 	Truck, small bulldozer, seeder.	Fill soil, topsoil, seed, fertilizer and mulch.
	Vegetation Final Surface	<ol style="list-style-type: none"> 1. Mow grass semiannually. 2. Revegetate bare spots and eroded areas. 		Truck small bulldozer, seeder and mower.	Fill soil, topsoil, seed, fertilizer, mulch and erosion matting.

Post-Closure Maintenance Plan

**Modern Plating Corporation
 CAMU**

Electronic Filing Received, Clerk's Office 02/03/2026

Equipment or Area	Description	Preventive Maintenance	Corrective Maintenance Procedures	Equipment Requirements	Material Needs
Berms	Exterior Berms	<ol style="list-style-type: none"> Mow grass semiannually. Revegetate bare spots and eroded areas. 	<ol style="list-style-type: none"> Repair eroded areas by filling with soil to grading and adding erosion mat prior to seeding. Seed, fertilize and mulch. 	Truck, small bulldozer, seeder	Fill soil, topsoil, seed, fertilizer, mulch and erosion matting.
Environmental Monitoring Devices	Groundwater Monitoring Wells	<ol style="list-style-type: none"> Mark wells with flag to prevent damage during other maintenance. 	<ol style="list-style-type: none"> Repair/replace broken protector pipes, surface seals and locks. 	Shovel	Protector pipes, bentonite lock/key set, PVC pipe
Security Devices	Means to Control Entry Exterior Lighting	<ol style="list-style-type: none"> Repaint rusted or scratched areas. Replace burnt out bulbs. 	<ol style="list-style-type: none"> Repair or replace worn or rusty fences. 	Hand tools	Fence/gate parts and locks
Surface Water Management and Erosion Control Structure	Sedimentation Pond	<ol style="list-style-type: none"> Clean sediment from ponds. Remove debris from pipes and trash rack. 	<ol style="list-style-type: none"> Repair eroded inlet/outlet, dikes, etc. Repair eroded or silted in areas. Clean trash rack, inlet and outlet pipes. 	Backhoe, truck, shovel	Fill soil, erosion control materials (e.g., riprap), pipes
Access Roads	Ditches, Culverts, Spillways, etc.	<ol style="list-style-type: none"> Clean sediment from ditches. 	<ol style="list-style-type: none"> Replace rusted culverts. Repair eroded areas and install erosion control measures. 	Backhoe, truck, shovels	Fill soil erosion control materials (e.g., riprap), pipes
Final Cover	Gas Vents	<ol style="list-style-type: none"> Remove mud tracking. Clean vents. 	<ol style="list-style-type: none"> Repair ruts, pot holes, etc. Repair, replace damaged vents and surface seals. 	Truck, shovels Shovel	Road gravel Piping, glue, etc.

ATTACHMENT C

**GROUNDWATER MONITORING PROGRAM
ATTACHMENTS**

MODERN PLATING CORP

RCRA Post – Closure Permit

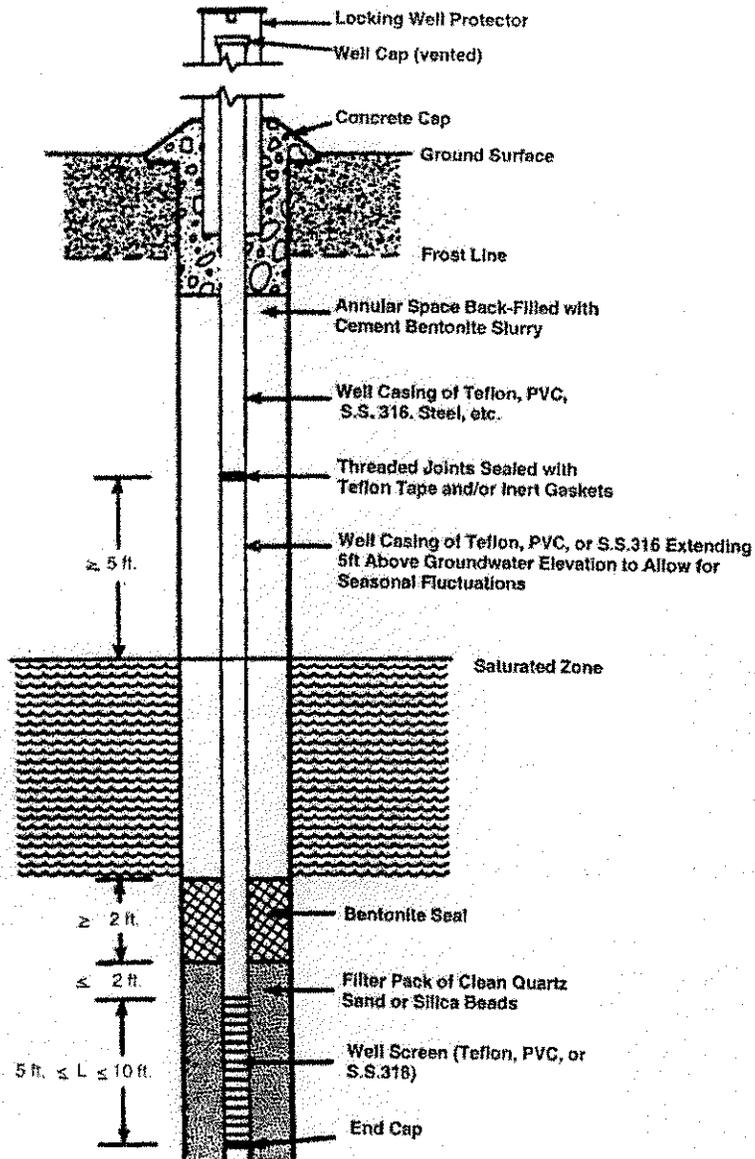
IEPA No. ID #1770200010

USEPA ID No. 005172325

Log No. B-167R

1770200010
Modern Plating Corp.
RCRA Log No. B-167R

Monitoring Well Diagram



1770200010
 Modern Plating Corp.
 RCRA Log No. B-167R



Illinois Environmental Protection Agency

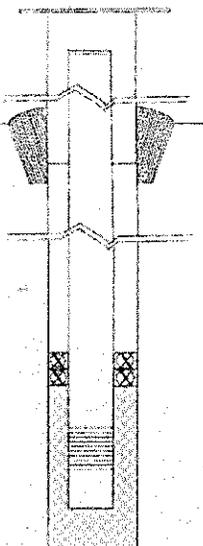
Well Completion Report

Site Number: _____ County: _____

Site Name: _____ Well #: _____
 State _____ Borehole #: _____
 Plane Coordinate: X _____ Y _____ (or) Latitude: _____ Longitude: _____

Surveyed by: _____ IL Registration #: _____
 Drilling Contractor: _____ Driller: _____
 Consulting Firm: _____ Geologist: _____
 Drilling Method: _____ Drilling Fluid (Type): _____
 Logged By: _____ Date Started: _____ Date Finished: _____
 Report Form Completed By: _____ Date: _____

ANNULAR SPACE DETAILS	Elevations (MSL)*	Depths (BGS)	(.01ft.)
Type of Surface Seal: _____	_____	_____	Top of Protective Casing
Type of Annular Sealant: _____	_____	_____	Top of Riser Pipe
Installation Method: _____	_____	_____	Ground Surface
Setting Time: _____	_____	_____	Top of Annular Sealant
Type of Bentonite Seal - - Granular, Pellet, Slurry (Choose One)	_____	_____	Static Water Level (After Completion)
Installation Method: _____	_____	_____	Top of Seal
Setting Time: _____	_____	_____	Top of Sand Pack
Type of Sand Pack: _____	_____	_____	Top of Screen
Grain Size: _____ (Sieve Size)	_____	_____	Bottom of Screen
Installation Method: _____	_____	_____	Bottom of Well
Type of Backfill Material: _____ (if applicable)	_____	_____	Bottom of Borehole
Installation Method: _____	_____	_____	



* Referenced to a National Geodetic Datum

CASING MEASUREMENTS

Diameter of Borehole (inches)	
ID of Riser Pipe (inches)	
Protective Casing Length (feet)	
Riser Pipe Length (feet)	
Bottom of Screen to End Cap (feet)	
Screen Length (1" slot to last slot) (feet)	
Total Length of Casing (feet)	
Screen Slot Size **	

**Hand-Slotted Well Screens are Unacceptable

WELL CONSTRUCTION MATERIAL
 (Choose one type of material for each area)

Protective Casing	SS304, SS316, PTFE, PVC, or Other
Riser Pipe Above W.T.	SS304, SS316, PTFE, PVC, or Other
Riser Pipe Below W.T.	SS304, SS316, PTFE, PVC, or Other
Screen	SS304, SS316, PTFE, PVC, or Other

1770200010
 Modern Plating Corp.
 RCRA Log No. B-167R

ILLINOIS EPA MONITOR WELL PLUGGING AND ABANDONMENT PROCEDURES

		Well Construction	Plugging Procedure
I. Unconsolidated Sediment Wells	I-A	...if backfilled with cement grout above bentonite seal and/or sandpack.	<ol style="list-style-type: none"> 1. Cut casing off at desired depth. 2. Mix neat cement slurry (5 gal. water per 94 lb. bag cement). 3. Insert tremi pipe (1" i.d. pvc) into well and extend to bottom. 4. Slowly pump slurry under low pressure through tremi pipe. 5. Slowly withdraw tremi pipe - making sure bottom of pipe remains below pure slurry. 6. Continue slow pumping until all formation water and the watery slurry mix is displaced from top of casing.
	I-B	...if backfilled with soft sediments (cuttings) above bentonite seal and/or sandpack.	<ol style="list-style-type: none"> 1. Knock out and remove thin surface concrete plug, if present. 2. Re-auger entire length of well. 3. Remove well casing from re-augured borehole. 4. Mix neat cement slurry (5 gal. water per 94 lb. bag cement). 5. Insert tremi pipe (1" i.d. pvc) into augers and extend to bottom. 6. Slowly pump slurry under low pressure through tremi pipe. 7. Continue slow pumping until all formation water and the water slurry mix is displaced from top of casing. 8. Slowly withdraw tremi pipe - making sure bottom of pipe remains below pure slurry. 9. Pull a flight of augers (5" if in unstable materials and hole collapse is likely or 10" if in competent material and collapse is unlikely). 10. Top off cement slurry after each flight is removed.
II. Bedrock Wells	I-C	...if monitor well construction is unknown:	<ol style="list-style-type: none"> 1. Follow procedures in I-A.
	II-A	...All bedrock monitor wells:	<ol style="list-style-type: none"> 1. Cut casing off at desired depth. 2. Mix neat cement slurry (5 gal. water per 94 lb. bag cement). 3. Insert tremi-pipe (1" i.d. pvc) into well and extend to bottom. 4. Slowly pump slurry under low pressure through tremi pipe. 5. Slowly withdraw pipe making sure bottom of pipe remains below pure slurry. 6. Continue slow pumping until all formation water and the watery slurry mix is displaced from top of casing.

Well Plugging Procedures (revised 02/06/02)

1770200010
 Modern Plating Corp.
 RCRA Log No. B-167R

Formatting Requirements for the 01 Record of the Electronically Submitted
 Groundwater and Leachate Data (the 01 Record portion of the LPC-160 is included
 for example purposes)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

Page 1 of _____

RECORD CODE: L P C S M 0 1
 TRANS CODE: A

REPORT DUE DATE: / /
35 38 D Y 41

FEDERAL ID NUMBER: _____

SITE INVENTORY NUMBER: _____
9 14

MONITOR POINT NUMBER: _____
(see Instructions) 15 21

REGION: _____ CO.: _____

DATE COLLECTED: / /
23 M D Y 28

FACILITY NAME: _____

FOR IEPA USE ONLY

LAB: _____
29

DATE RECEIVED: / /
42 M D Y 47

BACKGROUND SAMPLE (X) _____ TIME COLLECTED: _____
54 (24 Hr. Clock) 55 11 M 58

UNABLE TO COLLECT SAMPLE _____
(see Instructions) 59

MONITOR POINT SAMPLED BY: _____
(see Instructions) 60 OTHER (SPECIFY): _____

SAMPLE FIELD FILTERED — INORGANICS (X) _____ ORGANICS (X) _____
61 62

SAMPLE APPEARANCE: _____
63

COLLECTOR COMMENTS: _____
101 103

LAB COMMENTS: _____
142 150 159

IL 532 1213
 LPC 160 01-90

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to \$25,000 for each day the failure continues a fine up to \$1,000.00 and imprisonment up to one year. This form has been approved by the Forms Management Center.

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

*Only Key punch with Data in Column 35 or Columns 38-47

1770200010
 Modern Plating Corp.
 RCRA Log No. B-167R

Page C-6 of C-7

KEY:

<u>Spaces Numbered</u>	<u>Description</u>	<u>Format</u>
Spaces 1-7	Record Code	LPCSM01
Space 8	Trans Code	A
Spaces 9-18	Site ID	0000000000
Spaces 19-22	Mon Pt ID	G000
Spaces 23-28	Date Collected	000000
Space 29	Lab	
Spaces 30-35	Filler	
Spaces 36-41	Report Due Date	000000
Spaces 42-47	Date Received	000000
Spaces 48-53	Filler 2	
Space 54	Background Sample	
Spaces 55-58	Time Collected	0000
Space 59	Unable to Collect Sample	
Space 60	Monitoring Point Sampled By	
Space 61	Field Filtered – Inorganic	
Space 62	Field Filtered – Organic	
Spaces 63-102	Sample Appearance	
Spaces 103-142	Collector Comments	
Spaces 143-149	Filler 3	
Spaces 150-199	Lab Comments	

1770200010

Modern Plating Corp.

RCRA Log No. B-167R

Formatting Requirements for the 02 Record of the Electronically Submitted Groundwater and Leachate Data (the 02 Record portion of the LPC-160 is included for example purposes)

RECORD CODE L P C S M 0 2 TRANS CODE A (COLUMNS 9-29 FROM ABOVE)

	FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER	Remarks See Inst.	Replicate	< or >	VALUE
Q	TEMP OF WATER (unfiltered °F)	0 0 0 1 1 <small>30 34</small>				----- . ----- <small>38 47</small>
Q	SPEC COND (unfiltered umhos)	0 0 0 9 4				----- . -----
Q	pH (unfiltered units)	0 0 4 0 0				----- . -----
Q	ELEV OF GW SURF (ft ref MSL)	7 1 9 9 3				----- . -----
Q	DEPTH OF WATER (ft below LS)	7 2 0 1 9				----- . -----
A	BTM WELL ELEV (ft ref MSL)	7 2 0 2 0				----- . -----
Q	DEPTH TO WATER FR MEA PT (ft)	7 2 1 0 9				----- . -----
						----- . -----
						----- . -----

IL 532 1213
LPC 160 01/90

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 ½, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to \$25,000 for each day the failure continues a fine up to \$1,000.00 and imprisonment up to one year. This form has been approved by the Forms Management Center.

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

*Only Key punch with Data in Column 35 or Columns 38-47

KEY:

Spaces Numbered

- Spaces 1-7
- Space 8
- Spaces 9-18
- Spaces 19-22
- Spaces 23-28
- Space 29
- Spaces 30-34
- Space 35
- Space 36
- Space 37
- Space 38-47

Description

- Record Code
- Trans Code
- Site ID
- Mon Pt ID
- Date Collected
- Lab
- STORET Number
- Remarks
- Replicate
- < or >
- Value

Format

- LPCSM02
- A
- 0000000000

Well Survey Procedures at RCRA Facilities

All RCRA facilities pursuing risk-based closure pursuant to 35 Ill. Adm. Code Part 742 (TACO) must identify potable water supply wells and regulated recharge areas to ensure the protection of potable water supplies. This includes situations where the facility has determined that contamination has migrated beyond a property boundary or is predicted to migrate beyond a property boundary.

In order to meet these requirements, the facility in question must submit maps with the locations of all on-site and off-site injection wells, as well as withdrawal wells and recharge areas within at least 2,500 feet of the most downgradient point of contamination (map scale must be no less than one inch equals 200 feet). The facility must submit a certification form that states that all of the above source have been contacted. This information shall be obtained by the facility, by contacting all of the following sources:

Illinois State Geological Survey;
Illinois State Water Survey;
Illinois EPA Division of Public Water Supply;
Illinois Department of Public Health;
County and Municipal Health Departments; and
Local water supply entity (i.e., public water districts, public water supply companies).

If it is determined that groundwater contamination has or is modeled to migrate off-site exceeding the Tier 1 remediation objectives of 35 Ill. Adm. Code 742, the area of the survey of water supply wells is extended based on the actual and modeled groundwater plume.

Documentation of the results of the survey of water supply wells must include the following information:

- Map(s) to appropriate scale showing the location of community water supply wells and other potable water supply wells including the setback zones of the wells identified in the survey (within applicable distances as defined by the appropriate program regulations, including all potable wells on the site). The location of the measured and modeled contamination plume, as appropriate based on the phase of remediation being conducted, shall also be shown on the map(s) if the measured or modeled plume extends off-site. In addition, the location of any regulated recharge areas, well head protection areas and delineated recharge areas of any community water supply well or other potable water supply well identified that are available from the Illinois EPA, Division of Public Water Supplies (<http://il.water.usgs.gov/factsheets/>);
- Table(s) indicating the setback zone for each community water supply well and potable water supply well identified;

Page 2

- Narrative to supplement the map(s) and table(s) identified above. This includes the person(s) contacted as part of the survey, that person's title, sources of information used, field observations, etc.; and
- Certification by a Licensed Professional Engineer that the entities listed above have been contacted as part of the well survey and the information obtained is included in the map(s), table(s) and narrative.

Illinois EPA may require additional investigation of potable water supply well locations on a case-by-case basis if site-specific conditions warrant. These conditions include, but would not be limited to:

- The local water supply entity does not bill a residence/business located within the search area, and the other record searches do not show a potable well on the property; or
- The well survey identifies a few private or semi-private potable wells near the site. Because this does not account for all the residences or businesses in the same area near the site, questions should be raised as to where the other homes/businesses obtain their potable water.

Additional investigation may include a physical well survey (e.g. face-to-face interviews with property owners, a windshield survey looking for wellheads, distribution of door hangers requesting information about the existence of potable wells on the property, etc.) when data sources identified above do not appear to have adequately identified the location of potable wells (i.e. the two examples immediately above). This physical survey will include, at a minimum, the placement of written information at properties within the measured or modeled distance of the groundwater plume.

NOTE: If contamination at a remediation site cannot be modeled due to geology constraints (i.e. bedrock), the information requested above shall be collected at a distance to be determined by the Illinois EPA on a site-by-site basis.

WRW:AMB:mls/053443s.doc

ATTACHMENT D

LEACHATE ANALYTICAL PARAMETERS

MODERN PLATING CORP

RCRA Post – Closure Permit

IEPA No. ID #1770200010

USEPA ID No. 005172325

Log No. B-167R

1770200010
 Modern Plating Corp.
 RCRA Log No. B-167R

Page D-1 of D-1

TABLE 1**Sample Parameters**

Parameter	Cas No.	ICP/MS	Reporting Units
Boron	7440-42-8	EPA-6020A	mg/L
Cadmium	7440-43-9	EPA-6020A	mg/L
Chromium	7440-47-3	EPA-6020A	mg/L
Cobalt	7440-48-4	EPA-6020A	mg/L
Cooper	7440-50-8	EPA-6020A	mg/L
Iron	7439-89-6	EPA-6020A	mg/L
Lead	7439-92-1	EPA-6020A	mg/L
Manganese	7439-96-5	EPA-6020A	mg/L
Magnesium	7439-95-4	EPA-6020A	mg/L
Mercury	7439-97-6	EPA-6020A	mg/L
Nickel	7440-02-0	EPA-6020A	mg/L
Potassium	7440-09-7	EPA-6020A	mg/L
Silver	7440-22-4	EPA-6020A	mg/L
Sodium	7646-69-7	EPA-6020A	mg/L
Thallium	7440-28-0	EPA-6020A	mg/L
Zinc	7440-66-6	EPA-6020A	mg/L
Total Metals	--	EPA-6020A	mg/L
VOC Scan	--	EPA-8260	ug/L
PaHs	--	EPA-550	ug/L
Chloride	--	325.2/325.3	mg/L
Fluoride	--	340.1/340.2	mg/L
Nitrate	--	353.2/353.4	mg/L
Sulfate	--	375.4/375.2	mg/L
Cyanide	57-12-5	SM4500CN C/SW9012A	mg/L
BOD	--	SM5210B	mg/L
TSS	--	SM2540D	mg/L
pH	--	150.1/150.2	S.U.
Alkalinity	--	EPA-310.2	

*Some parameters may be combined in a sample bottle determined by the analytical lab.

MLC:mls/053443s.doc

EXHIBIT E



Electronic Filing: Received, Clerk's Office 02/03/2026

Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield, Illinois • 62794-9276 • 217-782-3397

JB Pritzker, Governor

James Jennings, Acting Director

217/524-3301

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

SEP 30 2025

9589 0710 5270 0389 7166 67

Modern Plating Corporation
Attn: James R. Stenberg, President/CEO
701 South Hancock Avenue
P.O. Box 838
Freeport, Illinois 61032-0838

Re: 1770200010 -- Stephenson County
Modern Plating Corporation
ILD005172325
Log No. B-167R2
RCRA Permits Administrative Record – 24D
Permit Approval

Dear Mr. Stenberg:

Attached is a final renewed Resource Conservation and Recovery Act (RCRA) Hazardous Waste Management Post-Closure permit (Permit) for the above-referenced facility. The final permit decision is based on the administrative record contained in the Illinois EPA's files. The contents of the administrative record are described in Title 35 Illinois Administrative Code (35 IAC) 705.211.

Please read the RCRA Permit carefully. Failure to meet any portion of the RCRA Permit could result in civil and/or criminal penalties. The only comments received on the draft RCRA Permit were from Foth Infrastructure & Environment, LLC (Foth) on behalf Modern Plating Corporation (MPC). The Illinois EPA's responses to MPC's comments are attached to this letter.

This action shall constitute the Illinois EPA's final action on the subject submittal. The applicant may appeal this final decision to the Illinois Pollution Control Board pursuant to Section 40 of the Environment Protection Act (Act) by filing a petition for a hearing within 35 days after the date of issuance of the final decision. However, the 35-day period may be extended for a period of time not to exceed 90 days by written notice from the applicant and the Illinois EPA within the initial 35-day appeal period.

1770200010 – Modern Plating Corporation

Log No. B-167R2

Page 2

If the owner or operator wishes to receive a 90-day extension, a written request that includes a statement of the date the final decision was received, along with a copy of this decision, must be sent to the Illinois EPA as soon as possible.

For information regarding the request for an extension, please contact:

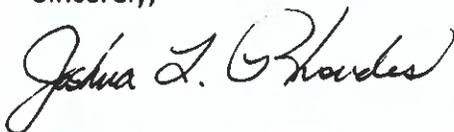
Illinois Environmental Protection Agency
Division of Legal Counsel
2520 West Iles Avenue
Post Office Box 19276
Springfield, IL 62794-9276
217/782 5544

For information regarding the filing of an appeal, please contact:

Illinois Pollution Control Board
60 East Van Buren St., Suite 630
Chicago, IL 60605-1241
312/814-3620

Any questions regarding groundwater issues, please contact Aidan Fullriede at 217/557-8770 or aidan.fullriede@illinois.gov. For all other question, please contact Takako Halteman, P.E. at 217/524-3274 or takako.halteman@illinois.gov.

Sincerely,



Joshua L. Rhoades, P.G.
Permit Section Manager
Bureau of Land

Attachments: Illinois EPA's Responses to Comments
Renewed RCRA Hazardous Waste Management Post-Closure Permit

JLR: TNH:1770200010-RCRA-B167R2-Approval.docx

TNH AMB JF

cc: David Servatius – Modern Plating Corp.
Heather Hallett, Foth
Andrea K. Martin, P.E., Foth
Norberto Gonzalez, USEPA Region V
Emily Keener, USEPA Region V

ILLINOIS EPA'S RESPONSES TO COMMENTS
DRAFT RCRA HAZARDOUS WASTE MANAGEMENT POST-CLOSURE PERMIT
DATED August 5, 2025
Modern Plating Corporation
RCRA PERMIT LOG NO. B-167R2

The Illinois EPA's responses below address comments from Foth Infrastructure & Environment, LLC (Foth) on behalf of Modern Plating Corporation (MPC) dated September 19, 2025, pertaining to the draft RCRA Post-Closure permit issued August 5, 2025. MPC's comments are listed in italics and the Illinois EPA response follow.

Comment 1

Fact Sheet, Section IIA; Statement says they are a "chrome plating facility", but they are not anymore, they are an "electroplating facility". List of hazardous constituents says "chromium, cyanide, and chlorinated solvents". Cyanide is not a contaminant of concern in groundwater.

The facility currently does electroplating, so this description should say "electroplating" instead of chrome plating. We request that cyanide be removed from the list of hazardous constituents in groundwater.

Illinois EPA Response

Illinois EPA acknowledges that MPC is a former chrome plating facility and is currently operating as an electroplating facility. The fact sheet is not a part of the final permit.

Cyanide has been identified as one of the historical hazardous constituents in the listed hazardous waste, F002 along with F006, which was managed at the facility and placed in the corrective action management unit (CAMU). Cyanide is directly related to the waste managed in the CAMU; therefore, Illinois EPA considers cyanide a necessary constituent to be monitored. A condition has been added to Section V.B.2 for the facility to submit a Class 1* permit modification to demonstrate cyanide does not need to be added to the list of hazardous constituents to be monitored in Section III.

Comment 2

*Fact Sheet, Section III.8.1.a; The compliance period during which the groundwater protection standard applies shall be extended until the Permittee demonstrates that the groundwater protection standards of 35 IAC Part 620 have not been exceeded at the GMZ boundary for **three consecutive years**. In the previous RCRA permit, the standard was **two consecutive years**.*

We request that this requirement be corrected to two consecutive years.

Illinois EPA Response

The Illinois EPA acknowledges this comment and notes that it is repeated as Comment 7 to Permit Condition III.D.3. In response to Comment 2, the Illinois EPA does not include a fact sheet with the final permit issuance, so no revision is necessary. The Permit will not be revised at this time in response to this comment.

Comment 3

Condition II.C.1 and II.C.2; Corrective Action Activities are ongoing at the site and the 30-yr post-closure period is coming to an end. Post-closure care period of the CAMU must be extended for an additional 30-yr period or until no unacceptable risk to human health and the environment are present.

We object to the extension of the post-closure care period for an additional 30-year period. IEPA's additional requirements are arbitrary and capricious. There is evidence of natural attenuation of groundwater contaminants of concern and few exceedances of groundwater standards in the GMZ wells, so an additional 30-year post-closure care period is not warranted. A 10-year extension is more appropriate. Post-closure care will be revisited when the RCRA Part B permit is due to be renewed.

Illinois EPA Response

The Illinois EPA is required to establish permit conditions that are protective of human health and the environment and can request a facility to establish or modify their RCRA Permit to meet these conditions in accordance with 35 IAC 703.241 and 35 IAC 724.218(d).

The CAMU at the facility is in the initial 30-year post-closure care period in accordance with 35 IAC 724.217(a)(1) Post-Closure Care Period, which states:

"1) Post-closure care for each hazardous waste management unit subject to the requirements of Section 724.217 through 724.220 must begin after completion of closure of the unit and continue for 30 years after that date..."

Conditions II.C.1 and II.C.2 require to extend the post closure care period, by way of Class 2 permit modification, to extend for 30 years or until such time as no unacceptable risks to human health and the environment exists. If the facility does not propose to extend for an additional 30 years, then the facility must demonstrate that there are no unacceptable risks to human health and the environment at the required permit modification date, August 6, 2030.

It must be noted that the wastes placed in the 1.2-acre CAMU include 14,500 cubic yards of electroplating sludge (F002 and F006 listed wastes) and remediated contaminated materials, which will continue to be remain in the CAMU. Post-closure

care of the CAMU is necessary to prevent any releases of hazardous constituents and potential risks to human health and the environment.

According to the most recent annual leachate report, 18,265 gallons of leachate was generated between July 1, 2024 through June 30, 2025, which is the maximum volume of leachate ever reported for this CAMU since the reporting started in 2003. Furthermore, this is after no leachate (zero gallons) was reported for 13 years between September 1, 2010 and June 30, 2023. A total of 2000 gallons of leachate was reported for 2024. As indicated, corrective action for groundwater at the site continues, and such significant increases of leachate generation is considered a potential threat to human health and the environment. In addition, apparent violations were noted in Illinois EPA Violation Notice L-2023-00363 associated with the leachate management system during an August 4, 2023 site inspection by the Illinois EPA.

It is noted that the current evaluation to determine if the extension of post-closure care period is necessary is based on, but may not be limited to, the following applicable regulations and reference materials (which are subject to change when they are updated or any new applicable guidance become available):

- a. The following sections of 35 IAC Part 724: 724.131, 724.210 through 724.220, 724.410.
- b. 35 IAC 703.241, 35 IAC 724.218(d), and 35 IAC 703 Appendix A, E.2;
- c. Sections 12(a), 21(n) and 39(g) of the Illinois Environmental Protection Act (Act);
- d. USEPA's Guideline for Evaluating Post-Closure Care Period, dated December 15, 2016; and
- e. ASTSWMO Position Paper, dated July 20, 2022 "Post-Closure Care Beyond 30 Years at RCRA Subtitle C Facilities".

This condition remains unchanged.

Comment 4

Condition II.E.7.d; Leachate collection and removal system should be maintained so that the depth of leachate over the liner in Phase I and II of the CAMU do not exceed 1 foot.

The system is designed to turn on at 18 inches. Lowering it to 1 foot burns out the pump. We request that this requirement be changed to 18 inches.

Illinois EPA Response

In accordance with 35 IAC 724.401(a)(2), 724.401(c)(2), and 724.351(a)(2), leachate depth exceeding 12 inches (30 centimeter) is prohibited. This requirement was also included in Condition II.C.6.e of the previous permit. Although Conditions II.C.6, f and g of the previous permit also included erroneous ground elevations for the leachate collection and removal system, the requirements of applicable regulations (i.e., 35 IAC 724.401(a)(2), 724.401(c)(2), and 724.351(a)(2)) must be met and the condition was revised to reflect the requirement of no more than a 12-inch accumulation of leachate. It must be noted that this requirement ensures that no excessive liquid is generated to compromise the integrity of the liner and waste containment system of the CAMU and to prevent impacting the groundwater.

Illinois EPA understands that the facility cannot comply with the requirement using the current pump system. Thus, the facility must develop a plan to come in compliance with the requirement by developing and submitting a workplan to correct the leachate collection system within 90 days of the effective date of the Permit. This requirement is reflected in Condition V.B.1.g of the Permit. This condition remains unchanged.

Comment 5

Condition II.G.1; Must have financial assurance of at least \$413,858 adjusted annually for inflation.

We object to this requirement because IEPA's additional requirements are arbitrary and capricious. This is different from the current structure and is financially burdensome.

Illinois EPA Response

The CAMU at the facility is in the initial 30-year post-closure care period. In accordance with 35 IAC 724.244 (a)(2), the post-closure care cost estimate is calculated by multiplying the annual post-closure cost estimate by the number of years of post-closure care required under 35 IAC 724.217. As 35 IAC 724.217(a)(1) requires minimum of 30-year of post closure care, post closure care cost estimate for the 30 year of post-closure care period is required.

Furthermore, the Illinois EPA has evaluated the requirements for post-closure care, cost estimates, and financial assurance for the hazardous waste management unit based on the applicable regulations and documents referenced in the Illinois EPA's response to Comment 3 and has determined that financial assurance equivalent to the rolling 30-year post-closure care cost estimate is minimally necessary to address such financial risks to the State and the citizens of Illinois at the unit with hazardous waste left in place and undergoing post-closure care. Therefore, the post-closure cost estimate must be

calculated by multiplying the annual post-closure cost estimate by 30 (the number of years required in the CAMU post-closure care period).

35 IAC 724.245 outlines the financial assurance mechanisms required and available to RCRA facilities. A RCRA-permitted facility shall maintain financial assurance for 30 years for the entire post-closure care period unless it has completed a post-closure activity or made changes to the post-closure plan, which would cause a reduction in the post-closure cost estimate. If a post-closure activity is completed or a change in a post-closure plan is approved, the facility may submit a request for a reduced post-closure cost estimate to Illinois EPA. This condition remains unchanged.

Comment 6

Condition II.G.2; Post-closure care costs are determined by multiplying annual costs by the full 30-yr post-closure period.

We object to this requirement because IEPA's additional requirements are arbitrary and capricious. This is different from the current structure and is financially burdensome.

Illinois EPA Response

See Illinois EPA's Response to Comment 5. This condition remains unchanged.

Comment 7

*Condition III.D.3; The compliance period during which the groundwater protection standard applies shall be extended until the Permittee demonstrates that the groundwater protection standards of 35 IAC Part 620 have not been exceeded at the GMZ boundary for **three consecutive years**. In the previous RCRA permit, the standard was **two consecutive years**.*

We request that this requirement be corrected to two consecutive years.

Illinois EPA Response

While the current GMZ boundary does not currently coincide with the compliance point for the CAMU, GMZs are intended to reduce in size over time based on effective corrective action. Therefore, eventually the GMZ boundary should be comprised of wells located at the downgradient boundary of the CAMU. Although the previous RCRA permit only required the facility's GMZ boundary wells meet the groundwater protection standards of 35 IAC Part 620 for two consecutive years prior to terminating the GMZ, the correct time frame is three years. The regulations for facilities in corrective action programs under 35 IAC 724.200, specifically 35 IAC 724.200(f), require: "The owner or operator may terminate corrective action measures taken beyond the period equal to the active life of the waste management area (including the closure period) if the owner or operator can demonstrate, based on data from the groundwater

monitoring program... that the groundwater protection standard of [35 IAC] Section 724.192 has not been exceeded for a period of three consecutive years." Therefore, the Illinois EPA has determined the groundwater monitoring program for corrective action measures (i.e. the GMZ) will not be terminated until such time as the groundwater protection standard has not been exceeded for three consecutive years at the groundwater monitoring program boundary. While the CAMU is not considered a landfill, listed hazardous waste material is contained within the unit and the groundwater must be managed equivalent to a RCRA hazardous waste management unit described in 35 IAC 724.200 and in accordance with 35 IAC 703.121. The Permit will not be revised in response to this comment.

Comment 8

Condition III.H.2; Semiannual groundwater sampling is required.

A large amount of historical data is available to establish seasonal fluctuations and trends. Groundwater concentrations have stabilized, and semiannual sampling is no longer required. We request that groundwater sampling frequency be reduced to once every two years.

Illinois EPA Response

The Illinois EPA acknowledges this comment but notes that any requests to change the groundwater monitoring program should be made in a permit modification request rather than in response to the draft permit. In order to make this request, the facility may submit a Class 1* permit modification to the Illinois EPA with information supporting the request. However, at this time, the Illinois EPA notes the facility is in corrective action and there is no apparent evidence to support reducing the groundwater sampling to a frequency less than semiannual. The Permit will not be revised in response to this comment.

Comment 9

Condition V.A; 39i Certification.

IEPA indicated that they received the form, nothing further needed. We ask that this request be removed.

Illinois EPA Response

The Illinois EPA acknowledges that it erroneously indicated to the MPC representative that this condition was to be removed. The intention of this condition is to inform and remind the Permittee that a completed 39i form is necessary to be submitted every time a permit modification request is made to the Illinois EPA. Thus, this condition remains unchanged.

Comment 10

Condition V.B.2.a; Submit updated survey plat.

There is no need to add additional hazardous waste storage areas or features because Modern Plating does not have additional waste storage, they do not store hazardous waste from electroplating, but instead they transfer it and ship it out regularly. We ask that this request be removed.

Illinois EPA Response

As indicated in Illinois EPA's response to Comment 3, the Illinois EPA must include conditions in a permit to ensure compliance with all requirements of the applicable regulations for conducting post-closure care of the CAMU. A survey of the CAMU has not been completed for 24 years since the closure was completed in 2001. As indicated in Illinois EPA's Response to Comment 4, sudden generation of excess amount of leachate after 13 years raises a significant concern for the integrity of the CAMU. In order to identify the current conditions of the CAMU, identify any settlement or other movement of benchmarks, an updated survey of the CAMU is necessary. This condition remains unchanged.

Comment 11

Condition V.B.1.b and c; Identification and descriptions of any hazardous waste management units and solid waste management units at the facility.

There is no need to add additional hazardous waste storage areas or features because Modern Plating does not have additional waste storage, they do not store hazardous waste from electroplating, but instead they transfer it and ship it out regularly. We ask that this request be removed.

Illinois EPA Response

The Illinois EPA clarifies that "any hazardous waste management units and solid waste management units" referenced in this condition are not any regulated unit under this Permit. It is required that such information must be included in Section B of the RCRA permit application but the information was not provided. Furthermore, the facility indicated during a site visit in April 2025 that a release of chemical managed at the facility has occurred in the past since the last renewed permit was issued. Such information was not included nor reported under the requirement in Condition IV.D of the previous permit. A renewal application for a RCRA permit must include complete information of the current industrial activities conducted at the permitted facility and identify any past releases, which may or may not require further corrective action under the RCRA permit requirement. According to the U.S. EPA RCRA database, RCRAInfo, the Permittee is listed as a large quantity hazardous waste generator. This means that the facility should have a dedicated less than 90-day hazardous waste storage area to meet

the requirements of 35 IAC 722.117. Please provide additional information to fulfill the application requirement in this condition.

Comment 12

Condition V.B.2.e; A water well survey is needed.

A water well survey was included in the 2021 RCRA Part B Renewal Application. We ask that this request be removed.

Illinois EPA Response

The Illinois EPA acknowledges the drinking water well survey submitted with the revised 2021 RCRA Part B Renewal Application dated January 8 and May 7, 2021. The Permit has been revised to remove Condition V.B.2.e in response to this comment.

Comment 13

Condition V.B.1.f; Submit most recent documentation for annual cleaning of leachate collection and leak detection systems with high- pressure jetting system.

The lines of the leachate collection system are not designed to be cleaned by high pressure jetting. The PVC may not be strong enough to withstand the pressure. Also, the lines are one-inch PVC and a small enough jetting head is not available to fit.

Illinois EPA Response

The Illinois EPA acknowledges this comment. However, this condition was developed based on the MPC's approved permit application. Section D.3 and Table B-2 (Post Closure Maintenance Plan) of the approved permit application indicated "clean the interior piping annually" for both the Leachate Collection System and Leachate Detection System. Furthermore, Appendix Q of the approved permit application included a CAMU Construction Documentation Report, which was referenced in Section 3.3 of the approved permit application. Section 12.4 of Appendix Q included "Pipe Cleaning" section, which states that "[t]he leachate and leak detection pipes will be cleaned annually with a high pressure water jetting system." If this method of cleaning is no longer applicable and the facility desires to utilize another method of cleaning, MPC may submit a proposal to revise this cleaning method. Regardless of the cleaning method utilized to date, MPC must submit the most recent documentation for the annual pipe cleaning program for the leachate collection and detection system.

Based on the comment provided above, Condition V.B.1.f was modified to add the following language:

If a high-pressure jetting system cannot be used to clean the pipes annually, the Permittee must include an alternative method of annual cleaning in the document prepared under Condition V.B.1.e.

Comment 14

Condition V.B.1.g; Submit a workplan to modify the current leachate system such that the leachate depth over the liner does not exceed one foot. Auto activate leachate pump at one foot.

The system is designed to turn on at 18 inches. Lowering it to 1 foot burns out the pump. We request that this requirement be changed to 18 inches.

Illinois EPA Response

See Illinois EPA's Response to Comment 4.

Comment 15

Condition V.B.1.h; Submit revised post-closure cost estimate and financial assurance to meet required minimum of 30 yrs post-closure.

We object to this requirement because IEPA's additional requirements are arbitrary and capricious. This is different from the current structure and is financially burdensome.

Illinois EPA Response

Historically, during the post-closure care period, the facility's financial assurance liability has been allowed to be reduced by prorating with the number of years completed, generally down to minimum of 10 years. However, this prorated-reduction or the minimum of 10 years did not take into consideration the financial risk to the Illinois EPA and citizens of Illinois, if the Illinois EPA would have to unexpectedly assume operation of the post-closure care at the facility. The Illinois EPA has evaluated the requirements for post-closure care, cost estimates, and financial assurance for the hazardous waste management unit(s) under 35 IAC Part 724, and has determined that financial assurance equivalent to the rolling 30-year post-closure care cost estimate is minimally necessary to address such financial risks to the State if any hazardous waste is left in place at the unit. If any evidence shows that the estimated cost should be higher than the 30-year cost, then it should be adjusted to a higher number of years. As required by 35 IAC 724.217(a) (1), a 30-year post closure care cost is required for establishing financial assurance. Any adjustment to this 30-year requirement must be made through a permit modification. Also see Illinois EPA's Response to Comment 5 for additional response.

Comment 16

Condition V.B.1.i; Submit proposal to address the continued exceedances.

We addressed this in the Corrective Action Modification Request submitted to IEPA 10-2024. We request to remove this requirement from the final permit.

Illinois EPA Response

The Illinois EPA acknowledges the comment and will respond to the October 15, 2024 submittal. The Permit has been revised to remove Condition V.B.1.i in response to this comment.

Comment 17

Attachment H, Table 1 Sample Parameters; Leachate Sampling Parameter and method list

The PAH method 550 should be updated to 8270 since 550 is for drinking water samples and 8270 is used currently. We request that this be updated in the final permit.

Illinois EPA Response

The Illinois EPA agrees with MPC's comment. The analytical method for PAHs has been revised to Method 8270.



Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield, Illinois • 62794-9276 • 217-782-3397

JB Pritzker, Governor

James Jennings, Acting Director

RCRA HAZARDOUS WASTE MANAGEMENT POST-CLOSURE PERMIT

1770200010 -- Stephenson County
Modern Plating Corp.
ILD005172325
Permit Log No. B-167R2
RCRA Permits Administrative Record – 24D

Issue Date: **SEP 30, 2025**
Effective Date: **NOV 04, 2025**
Expiration Date: **NOV 04, 2035**

PERMITTEE

Modern Plating Corporation
701 South Hancock Avenue
Freeport, Illinois 61032-0838

A Renewed RCRA Post-Closure permit is hereby granted to Modern Plating Corp. (MPC) as Owner, Operator and Permittee pursuant to Section 39(d) of the Illinois Environmental Protection Act (Act), and Title 35 Illinois Administrative Code (35 IAC) Subtitle G.

PERMITTED HAZARDOUS WASTE ACTIVITY

This Permit requires MPC to conduct the following hazardous waste activities in accordance with the approved permit application and conditions of this Permit.

Post-Closure Care of a closed landfill (CAMU) (D80)
Groundwater Monitoring Corrective Action
Corrective Action for a CAMU

This Permit consists of the conditions contained herein and those in the sections and attachments in this Permit. The Permittee must comply with all terms and conditions of this Permit and the applicable regulations contained in 35 IAC Parts 702, 703, 705, and 720 through 729 in effect on the effective date of this Permit.

This Permit is issued based on the information submitted in the approved permit application identified in Attachment C of this Permit and any subsequent amendments. Any inaccuracies found in this information provided in the permit application may be grounds for the termination or modification of this Permit (see 35 IAC 702.187 and 702.186) and potential enforcement action (415 ILCS 5/44(h)).

A handwritten signature in black ink, appearing to read "Joshua L. Rhoades".

Joshua L. Rhoades, P.G.
Permit Section Manager
Bureau of Land

AMB TNH LF

JLR: TNH:1770200010-RCRA-B167R2-Approval.docx

2125 S. First Street, Champaign, IL 61820 • 217-278-5800
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595 S. State Street, Elgin, IL 60123 • 847-608-3131
412 SW Washington Street, Suite D, Peoria, IL 61602 • 309-671-3022

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9511 Harrison Street, Des Plaines, IL 60016 • 847-294-4000
2309 W. Main Street, Suite 116, Marion, IL 62959 • 618-993-7200
4302 N. Main Street, Rockford, IL 61103 • 815-987-7760

RCRA HAZARDOUS WASTE MANAGEMENT POST-CLOSURE PERMIT

ISSUED TO

MODERN PLATING CORPORATION

FREEPORT, ILLINOIS

STATE ID No. 1770200010

ILD005172325

LOG No. B-167R2

**RCRA HAZARDOUS WASTE MANAGEMENT POST-CLOSURE PERMIT
B-167R2
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SECTION I: GENERAL FACILITY DESCRIPTION

A. OWNER AND OPERATOR

The facility is owned and operated by Modern Plating Corporation (MPC), herein referred to as the "Permittee." (35 IAC 702.121, 702.123, and 703.181)

Modern Plating Corp.
701 South Hancock Avenue
Freeport, Illinois 61032-0838

B. LOCATION

1. Location of Facility

The MPC facility is in Freeport, Illinois. MPC owns approximately 19 acres at this location with approximately 1.2 acres used for the management of hazardous waste in a Corrective Action Management Unit (CAMU). The MPC facility is located at:

Modern Plating Corp.
701 South Hancock Avenue
Freeport, Illinois 61032-0838

The facility contact is President/CEO and can be reached at 815-235-3111

2. Facility Map

The location of the closed CAMU (D80) within the MPC facility is shown on the facility drawing in Attachment E of this Permit.

C. DESCRIPTION OF HAZARDOUS WASTE MANAGEMENT ACTIVITIES

The Permittee was only allowed to place the following types of remediation wastes in the CAMU: Electroplating Sludge (F006) and soils contaminated with cadmium, chromium, cyanide, and trichloroethylene (F002). This included soils from the lagoons, Shawnee Building, cyanide vault, wetlands areas, outfall pipeline areas, and any other areas where similar remediation wastes were located during the closure and corrective actions at the facility.

The Permittee is prohibited from placing wastes in the CAMU without prior authorization from the Illinois EPA via a permit modification.

SECTION II: POST-CLOSURE CARE

A. SUMMARY

For the purpose of implementing remedies under 35 IAC 724.201, the Illinois EPA designated a new unit at the MPC facility as a permanent Corrective Action Management Unit (CAMU), as defined in 35 IAC 720.110. The design, construction, operation, and maintenance of the CAMU shall be conducted in accordance with the approved permit application, the requirements contained in this permit, and the regulations at 35 IAC 724.652.

The general location of the permanent CAMU is shown in Attachment E. The CAMU is located north of the wastewater treatment plant and was constructed in the same location that Lagoons 2 and 3 used to occupy. The CAMU is about 1.2 acres in size and holds remediation wastes generated from the closure and remediation of hazardous waste and solid waste management units at the MPC facility. The permitted volume of the landfill was 17,610 cubic yards (yd³) with a maximum volume of approximately 22,800 yd³. The total in-place volume of sludge and soil actually in the CAMU is approximately 14,500 yd³.

Hazardous waste management units (HWMUs), where waste is left in place, must receive post-closure care for at least 30 years after completion of closure. The CAMU was certified closed on August 6, 2001 (Log No. B-167-M-3). Pursuant to 35 IAC Part 724, activities that require post-closure care include, but are not limited to: (1) maintaining the final cover; (2) monitoring of the groundwater; and (3) providing financial assurance for post-closure activities.

B. UNIT IDENTIFICATION

1. The Permittee must provide post-closure care for the following hazardous waste management unit, as described in the approved permit application, subject to the terms and conditions of this Permit:

Unit Designation	Capacity	Surface Area Dimensions of Unit	Description of Waste and Hazardous Waste No.
Landfill (D80) – Closed CAMU	22,800 yd ³	1.2 acres (approximate)	Electroplating sludge (F006), and soils contaminated with cadmium, chromium, cyanide, and trichloroethylene (F002)

2. The geographical extents and location of the CAMU areas are identified on the map in Appendix C of the approved permit application and Attachment E. The lowest elevation of the sumps in the CAMU are at or above elevation 753.5 feet mean seal level (ft-MSL). The CAMU was constructed above elevation 757.0 The slopes of the final cover on the CAMU are not steeper than 3:1 on the perimeter slopes constructed of contaminated soils, and not steeper than 6:1 for the areas covering sludge. The CAMU was designed and constructed to achieve a minimum static slope factor of safety greater than or equal to 1.5 and a seismic factor of safety greater than or equal to 1.3.
3. The liner system on the bottom and sides of the unit is composed of the following layers, described from top to bottom:
 - a. Geocomposite drainage material (high density polyethylene [HDPE] drainage net between two layers of geotextile) with a minimum transmissivity of $3 \times 10^{-5} \text{ m}^2/\text{sec}$ (leachate collection system [LCS]);
 - b. 60-mil textured HDPE geomembrane (top liner);
 - c. HDPE drainage net (geocomposite on side slopes) with a transmissivity of $3 \times 10^{-5} \text{ m}^2/\text{sec}$ or more (leak detection system);
 - d. 60-mil textured HDPE geomembrane (upper component of the bottom liner);
 - e. Geosynthetic clay liner (lower component of the bottom liner); and
 - f. Prepared subgrade consisting of a minimum of 1-foot thickness of recompacted fine-grained soils.
4. The final cover system on the top of the unit is composed of the following layers, described from top to bottom:
 - a. 6-inch topsoil vegetative layer;
 - b. 18 inches rooting zone;
 - c. Geocomposite drainage layer;
 - d. 40-mil HDPE textured geomembrane;

- e. geosynthetic clay liner; and
 - f. 6-inch venting layer above the wastes.
5. A survey plat indicating the location and dimensions of the CAMU and any other hazardous waste disposal units with respect to permanently surveyed benchmarks was prepared and certified by a professional land surveyor. The notes on the plat state the owner's and operator's obligation to restrict disturbance of the CAMU in accordance with the applicable Subpart G regulations. These notes state:
- a. The waste materials contained in the CAMU are considered RCRA hazardous wastes. They include electroplating sludge (F006), and soils contaminated with cadmium, chromium, cyanide, and trichloroethylene (F002).
 - b. Any material removed from the CAMU during future activities must be managed as a hazardous waste in accordance with 35 IAC Subtitle G: Waste Disposal.
 - c. The use of this area is restricted.
6. The Plat of Survey (PIN 18-14-32-402-019) and Drawing No. 2 provided in Appendix J of the August 2001 Closure Documentation Report were filed with the Stephenson County Recorder's Office in Freeport, IL on July 26, 2001. The record data is Document No. 200100016096, Box 15, pages 111-116 (each 11" x 17" drawing was recorded as three separate 8.5" x 11" pages).

The Plat of Survey was attached to the deed to the property and serves as an instrument which is normally examined during title search that will in perpetuity notify any potential purchaser of the property that:

- a. The waste material in the CAMU is considered a RCRA hazardous waste;
- b. Use of the area is restricted; and
- c. A survey plat and record of the type, location and quantity of waste material in the CAMU was filed with the Illinois EPA and the County Recorder.

C. POST-CLOSURE CARE PERIOD

1. The post-closure care period for the CAMU began on August 6, 2001, the date of completion of closure of the final portion of the unit listed in Condition II.B.1. Post-closure care for the CAMU must continue for at least 30 years after that date.

Hazardous waste remains in the CAMU, and corrective action activities are ongoing at the site. Due to these conditions and pursuant to 35 IAC 703.241, 724.131, 724.410 as well as Section 12(a), 21(n), and 39(g) of the Illinois Environmental Protection Act (Act), the Permittee must continue to provide post-closure care for the CAMU beyond the initial 30 years of post-closure care (i.e., August 6, 2031). Post-closure care must be extended for an additional 30 years or until such time as no unacceptable risks to human health and the environment are present at the CAMU, as determined by the Illinois EPA.

2. On or prior to August 6, 2030 (one year before August 6, 2031), the Permittee must submit a Class 2 Permit Modification request to Illinois EPA in accordance with 35 IAC 703.241(a)(2) and 35 IAC 703, Appendix A, E.2 to extend the post-closure care period of the CAMU for an additional 30-year period or until such time as no unacceptable risks to human health and the environment are present at the CAMU, as determined by the Illinois EPA.
3. The Illinois EPA may include restrictions upon the future use of the site if necessary to protect public health and the environment, including permanent prohibition of the use of the site for purposes which may create an unreasonable risk of injury to human health or the environment. After administrative and judicial challenges to such restrictions have been exhausted, the Illinois EPA must file such restrictions of record in the Office of the Recorder of the county in which the hazardous waste disposal site is located.
4. The Permittee must not allow the property where the CAMU identified in Condition II.B.1 is located to be used in a way that could disturb the integrity of the final cover, liners, any components of the containment system, or function of the facility's monitoring systems unless the Illinois EPA finds, by way of a permit modification, that such use is necessary for either of the following reasons:
 - a. It is necessary for the proposed use of the property, and will not increase the potential hazard to the public health or the environment, or
 - b. It is necessary to reduce a threat to human health or the environment.

5. The Illinois EPA may require the continuation of any of the security requirements during part or all of the post-closure care period.

D. INSPECTIONS

1. The Permittee must inspect the components, structures, and equipment at the site in accordance with the inspection schedule in Attachment A and the conditions in this Permit. The results of each inspection must be documented in the facility's operating record.
2. The term "major rainfall event" as used in the inspection schedule shall be defined as any storm event of three inches of rain or more within a 24-hour period.
3. The Permittee must inspect the CAMU identified in Condition II.B.1 at least quarterly and within 72-hours of any rainfall event of three inches or more in a 24-hour period for evidence of any of the following:
 - a. Deterioration, malfunctions, or improper operation of run-on and run-off systems.
 - b. The deterioration of the cover systems.
4. Appropriate corrective action must be taken if problems, including erosion, blockage of channels, slope failure, etc. are observed at any time. If corrective action is taken, the area involved must be reinspected one month following completion of the work to ensure the corrective actions have adequately corrected the problem(s) noted.
5. Results of all inspections and a description of any remedial actions taken must be documented in the facility's operating record and maintained for the entire post-closure care period.
6. The Permittee must submit an annual post-closure care summary report to the Illinois EPA by June 1st of each year providing a summary of all inspections, maintenance, and repair activities for the CAMU performed during the preceding 12-month period from April through March. The first annual post-closure care summary report must be submitted by June 1, 2026.

E. MONITORING, MAINTENANCE, AND RECORDKEEPING

1. The Permittee must keep and maintain a written operating record that includes

all the records, reports, notification, monitoring data, testing or analytical data, and corrective action data required by 35 IAC 724.173 and the conditions in this Permit, for the entirety of the post-closure care period. The operating record must be kept onsite at the facility and available for Illinois EPA review.

2. The Permittee must maintain and monitor the groundwater monitoring system in accordance with Section III, the approved permit application and comply with the other applicable regulations of 35 IAC 724, Subpart F (Groundwater Protection) during the post-closure period.
3. The Permittee must maintain the integrity and effectiveness of the final cover, including making repairs to the cap as necessary to correct the effects of settling, subsidence, erosion, and other events.
4. The Permittee must prevent run-on from eroding or otherwise damaging the final cover. At a minimum the run-on control system must be capable of preventing flow onto the CAMU during peak discharge from a 25-year storm.
5. The Permittee must prevent run-off from eroding or otherwise damaging the final cover. At a minimum, the run-off management system must be capable of collecting and controlling the volume of water resulting from a 24-hour, 25-year storm.
6. The Permittee must comply with the requirements for landfills described in the approved permit application and the conditions of this Permit. Corrective action must be taken if ponding has been observed, if cracks or erosion channels greater than one inch wide have formed and if gas, odor, vegetative or vector problems arise, if leachate popouts or seeps are present, or if vegetation with tap roots is found to be growing in areas which are not designed to accommodate such vegetation.
7. The permittee must comply with the requirements for landfills at the CAMU as follows:
 - a. Maintain the integrity and effectiveness of the final cover system, including making repairs as necessary to correct the effects of settling, subsidence, erosion, cracking or other events.
 - b. Corrective action shall be taken if ponding water is observed, if cracks or erosion channels greater than one inch wide have formed for whatever reason, if gas, odor, vegetative or vector problems arise, if leachate

popouts or seeps are present, or if vegetation with tap roots is found to be growing in areas which are not designed to accommodate such.

- c. Protect and maintain surveyed benchmarks used in complying with surveying and recordkeeping requirements.
- d. The leachate collection and removal system for the CAMU must be operated and maintained such that the depth of leachate over the liner in Phase 1 and Phase 2 of the CAMU does not exceed more than one foot (30 centimeters) to meet the requirements at 35 IAC 724.401(a)(2), 724.401(c)(2), and 724.351(a)(2).
- e. Representative samples of leachate from Phases 1 and 2 must be collected from sample ports indicated in Appendix C, Drawing 12 of the approved permit application annually and analyzed individually for the listed constituents in Attachment H. These samples must be collected during the first quarter inspections. The results of these analyses must be submitted to the Illinois EPA by June 1 each year.
- f. The Permittee must evaluate the leachate analytical parameter list contained in Attachment H to determine whether any parameters listed in 35 IAC 724, Appendix I that are not included in Attachment H could potentially be present in the leachate. Any 35 IAC 724, Appendix I parameters identified during this evaluation that could potentially be present in the leachate must be added to the leachate analytical parameter list. This evaluation, along with any additional parameters that should be added to the leachate analytical parameter list must be submitted to Illinois EPA within 90 days of the effective date of this Permit.
- g. Information required by the groundwater monitoring program in Section III must be submitted in an electronic format. Additional guidance regarding the submittal of the information in an electronic format can be found at the Illinois EPA website.
- h. The following leachate withdrawal points will be used in leachate analysis required by Condition II.E.7.f. For purposes of electronic reporting, the points will be renamed as shown below.

<u>Name in Application</u>	<u>Name for Electronic Reporting</u>
Phase 1 Sample Port	L301
Phase 2 Sample Port	L302

- i. The Permittee must submit a completed "RCRA Facility Groundwater, Leachate and Gas Reporting form (LPC 592), as a cover sheet for all leachate reports for identification purposes. The form is not be used for permit modification requests.

F. NOTICES AND CERTIFICATION

1. A request to change the post-closure plan must be submitted in the form of a permit modification request. This request must be in accordance with applicable requirements of 35 IAC Parts 702, 703, and 724 and must include a copy of the amended post-closure plan for approval by the Illinois EPA.
2. If the Permittee or any subsequent owner or operator of the land upon which the CAMU listed in Condition II.B.1 is located wishes to remove hazardous wastes and hazardous waste residues, the liner, or contaminated soils, they must request a modification to this Permit in accordance with the applicable requirements in 35 IAC, Parts 703, 705, and 724. The owner or operator must at a minimum demonstrate that the removal of hazardous wastes will satisfy the criteria of 35 IAC 724.217(c).
3. If the Permittee seeks to demonstrate that they should be allowed to end the post-closure care period (e.g., all waste has been removed, and leachate and groundwater monitoring results do not indicate a potential for migration of waste at levels which may be harmful to human health and the environment), the Permittee must submit an Environmental Covenant (EC) for the future land use and management of the property on which the CAMU is located. The EC must be submitted at least one year prior to the date the Permittee expects to submit the Certification of Completion of Post-Closure Care.

Pursuant to 39(g) of the Act, the purpose of the EC is to place restrictions upon the future use of the site necessary to protect public health and the environment, including permanent prohibition of the use of the site for purposes which may create an unreasonable risk of injury to human health or the environment. The EC must be pursuant to a consent order between the Permittee and the State of Illinois and in the form and format specified by the Illinois EPA.

4. If the Permittee seeks to exit post-closure care, the Permittee must submit the following documents to the Illinois EPA by registered mail no later than 60 days after completion of the established post-closure care period for the CAMU listed in Condition II.B.1.
 - a. A properly completed Certification of Completion of Post-Closure Form provided in Attachment F that states the post-closure care for the CAMU was performed in accordance with the specifications in the approved post-closure plan in the approved permit application and the conditions in this Permit. The owner, operator, and a qualified Illinois licensed professional engineer must sign the Certification Form.
 - b. A Post-Closure Documentation Report that documents the post-closure conditions and activities at the facility during the post-closure care period. The Post-Closure Documentation Report must include the following:
 - i. Background information about the facility and the unit subject to the post-closure certification. Describe the facility and RCRA Permit history of the unit.
 - ii. A detailed description of the unit subject to the post-closure care certification that includes:
 - 1) The unit's design, including liner system, sumps, leachate collection, leak detection, and gas systems, and cover system including stormwater run-off and run-on controls. Provide this information in narrative form, and scale drawings.
 - 2) How it was operated, and how it was closed.
 - 3) When it was operated, and when it was closed.
 - 4) The wastes disposed of in the unit (including waste codes).
 - 5) The amount of leachate pumped each year from each sump in the unit's leachate collection and leak detection systems during the post-closure care period. Provide this information in both a table and graphically. Demonstrate the unit has met the requirements of 35 IAC 724.410(b)(2).

- 6) A scaled map showing location of the unit within the facility. Include all wells in the groundwater monitoring system for the unit on this map.
- 7) Scaled drawings (plan view and cross-section) showing the horizontal and vertical extent of the unit at the time it was certified closed, every 10 years after it was closed, and the time the Post-Closure Documentation Report is submitted (e.g., at the end of the post-closure period). The scale of the plan view should be 1 inch = 200 feet. All design components of the unit must be shown on the drawings.

When the drawings are compared, if difference in elevation of more than two feet exists at any location on the unit, the Post-Closure Documentation Report needs to indicate the reason for the change in elevation and provide a justification that the settlement(s) does not cause for concern in the future.

- 8) A survey of the unit when it was certified closed and at the time the Post-Closure Documentation Report is submitted (e.g., when the post-closure care period ended). The surveys must be certified by a professional land surveyor.
- iii. A general discussion on the inspection and maintenance of, and repairs to, the cover system, leachate collection, leak detection, gas collection, stormwater run-off and run-on controls, and wells in the groundwater monitoring system. Describe any problems and/or repairs to these systems that were addressed over the post-closure care period in chronological order. Show the locations of each of the repairs to these systems during post-closure care on a scaled drawing of the unit.
 - iv. A discussion on the groundwater monitoring program, including any corrective measures that were completed during the post-closure care period and a summary of the three most recent years of groundwater data. Identify the horizontal and vertical extent of any groundwater contaminant plume from the unit that existed at the beginning of the post-closure care period and every five years after that. The facility must have complied with all requirements of 35 IAC Parts 620 and 724 in order to certify completion of post-closure care activities.

- v. Colored photos of unit(s) at post-closure completion. Photo documentation of the unit should include at least one aerial (satellite) photo and photos of all design features of the unit.
 - vi. Completed Illinois EPA LPC-PA23 and 39(i) Forms.
 - c. Documentation that the EC required by Condition II.F.3 has been placed on the deed to the property on which the CAMU is located has been filed with the County Recorder's Office.
5. The certification of completion of post-closure care shall not be approved by the Illinois EPA until the Permittee demonstrated that the EC required by Condition II.F.3 has been properly filed with the appropriate governmental office (e.g., State of Illinois, or County Recorder's Office).

Within 60 days after receiving certifications from the owner or operator and a qualified Illinois licensed professional engineer that the post-closure care period has been completed for the CAMU listed in Condition II.B.1 in accordance with the approved post-closure plan, the Illinois EPA shall notify the owner or operator that it is no longer required to maintain financial assurance for post-closure care of that unit unless the Illinois EPA determines that post-closure care has not been in accordance with the approved post-closure plan. The Illinois EPA shall provide the owner or operator with a detailed written statement of any such determination that post-closure care has not been in accordance with the approved post-closure plan.

G. FINANCIAL ASSURANCE

1. The permittee must maintain financial assurance for post-closure care of the closed CAMU listed in condition II.B.1 of at least \$413,858 (current approved post-closure cost estimate in 2025 dollars) until such time as it is required to be modified pursuant to Condition V.B.1.h. This amount must be adjusted annually for inflation. Financial assurance meeting the requirements of 35 IAC 724, Subpart H must be maintained for post-closure of the closed CAMU.
2. Post-closure care costs are determined by multiplying annual costs by the full 30-year post-closure care period.

SECTION III: GROUNDWATER CORRECTIVE ACTION PROGRAM

A. SUMMARY

Hazardous waste constituents have been detected in groundwater monitoring wells, at the MPC facility, in the vicinity of HWMUs and SWMUs above the groundwater protection standard and background values. Therefore, a corrective action program meeting the requirements of 35 IAC 724.200 must be implemented at the MPC facility in Freeport, Illinois.

The groundwater corrective action program required by this Permit includes:

1. The construction of the CAMU which serves as the corrective action and subsequently the basis for the establishment of the Groundwater Management Zone (GMZ) (where the GMZ is defined as the three dimensional region containing groundwater being managed to mitigate impairment caused by the release of contaminants from a site that is subject to corrective action or for which the owner/operator undertakes an adequate corrective action in a timely and appropriate manner and provides written confirmation to the Illinois EPA).
2. Determining the quality of groundwater, within the GMZ and in the vicinity of the MPC facility, by comparing analytical results for the specified hazardous constituents to the concentration limits that comprise the groundwater protection standard.
3. Evaluating the effectiveness of the corrective action based on the quality of groundwater within the GMZ and in the vicinity of the MPC facility.

B. IMPLEMENTATION

1. The Permittee must implement the Groundwater Corrective Action Program upon the effective date of this Permit. On that date, the groundwater monitoring requirements set forth in this Permit shall supersede those previously established.
2. The Permittee must carry out the Groundwater Corrective Action Program specified in this Permit on the groundwater beneath the MPC facility in Freeport, Illinois. The uppermost aquifer in the vicinity of the facility has been identified as the unconsolidated aquifer consisting of permeable alluvial sand and gravel, as well as the underlying dolomite bedrock aquifer. For the purpose of this Permit and in accordance with the 35 IAC Part 620 regulations, the uppermost aquifer has been designated: (1) Class II: General Resource Groundwater for the

unconsolidated aquifer; and (2) Class I: Potable Resource Groundwater for the underlying dolomite aquifer. "Uppermost Aquifer" refers to the geologic formation nearest the natural ground surface that is an aquifer, as well as lower aquifers that are hydraulically connected with this aquifer in the vicinity of the facility. Groundwater monitoring wells at the MPC facility are identified as A through E, referring to the specific screened intervals. These are:

- A. Screened in the water table in the upper portion of the unconsolidated materials
 - B. Screened in the lower portion of the unconsolidated materials
 - C. Screened at the surface of the dolomite aquifer
 - D. Screened 20 feet into the dolomite aquifer
 - E. Screened 40 feet into the dolomite aquifer
4. The Permittee must continue corrective action measures during the compliance period to the extent necessary to ensure that the groundwater protection standard is not exceeded. If the Permittee is conducting corrective action at the end of the compliance period, the Permittee must continue that corrective action for as long as necessary to achieve compliance with the groundwater protection standard. The Permittee may terminate corrective action measures taken beyond the period equal to the active life of the waste management area (including the post-closure period) if the Permittee can demonstrate, based on data from the groundwater monitoring program pursuant to 35 IAC 724.200(f), that the groundwater protection standards found in Condition III.D.1 have not been exceeded for a period of three consecutive years.
5. The point of compliance, defined as the vertical surface located at the hydraulically downgradient limit of the waste management area(s) that extends down into the uppermost aquifer underlying the regulated unit, must be postponed for the regulated unit until such time that the GMZ monitoring wells have attained the applicable concentration limits that comprise the groundwater protection standard found in Condition III.D.1 and the GMZ expires. At that time, the facility must submit a proposal for establishment of a point of compliance which satisfies the regulatory requirements found in 35 IAC 724, Subpart F and reflects the current conditions of the facility.

C. WELL LOCATION AND CONSTRUCTION

1. The Permittee must install and maintain groundwater monitoring wells and piezometers at the locations specified in the table below to allow for the collection of groundwater samples and elevations from the uppermost aquifer. The locations of these wells and piezometers are specified in Figure C-5 of the approved permit application.

IEPA Well No.	Facility Well No.	Well Depth (Ft bgs)	Well Depth Elevation (Ft MSL)	Well Screen Interval (Ft MSL)
<u>"A" Groundwater Monitoring Wells</u>				
G06S	MW-6A V	11.6	742.1	747.1 - 742.1
G07S	MW-7A V	13.1	740.7	745.7 - 740.7
G08S	MW-8A V	17.0	741.7	746.4 - 741.4
G09S	MW-9A I	22.3	746.8	755.8 - 745.8
G10S	MW-10A I	21.1	744.0	753.8 - 743.8
G11S	MW-11A	13.2	742.0	747.7 - 742.7
G12S	MW-12A I	12.6	741.1	746.6 - 741.6
G13S	MW-13A I	12.0	741.1	745.9 - 740.9
G14S	MW-14A I	19.8	738.3	751.6 - 741.6
G15S	MW-15A I	12.5	743.7	749.1 - 744.1
G17S	MW-17A	16.7	739.8	743.8 - 738.8
G18S	MW-18A	11.7	743.9	743.6 - 738.6
G19S	MW-19A	14.7	740.6	745.7 - 740.7
GA1S	MW-21A I	24.4	748.0	757.2 - 747.2
GA2S	MW-22A I	24.6	748.8	758.4 - 748.5

"B" Groundwater Monitoring Wells

G06U	MW-6B	25.7	728.9	737.5 - 727.5
G07U	MW-7B	27.3	726.5	736.2 - 726.2
G12U	MW-12B V	27.4	727.9	735.6 - 725.6
G13U	MW-13B V	27.6	725.5	734.8 - 724.8
G14U	MW-14B V	22.2	736.7	741.6 - 736.6
G15U*	MW-15B*VI	28.5	727.8	734.6 - 724.6
G17U*	MW-17B*VI	37.4	719.3	729.3 - 719.3
G18U*	MW-18B*VI	38.3	717.0	727.3 - 717.3
G19U	MW-19B VI	37.7	717.7	727.9 - 717.9
GA3U	MW-23B VI	20.4	734.6	745.0 - 735.0

"C" Groundwater Monitoring Wells

G05M	MW-5C V	23.6	755.2	760.1 - 755.1
G06M	MW-6C V	43.0	711.4	715.9 - 710.9
G07M	MW-7C	34.4	719.6	718.3 - 713.3
G08M	MW-8C V	75.2	681.8	687.7 - 682.7
G11M	MW-11C V	65.5	689.5	693.8 - 688.8
G12M	MW-12C	52.9	701.0	705.6 - 700.6
G13M	MW-13C	84.4	669.0	674.0 - 669.0
G14M	MW-14C V	80.5	678.4	683.3 - 678.3
G15M*	MW-15C*VI	103.8	652.2	657.7 - 652.7
G16M*+	MW-16C*+VI	29.0	752.6	764.6 - 754.6
G17M*	MW-17C*VI	108.6	647.9	653.0 - 648.0
G19M*	MW-19C*VI	111.3	644.1	650.6 - 644.6
GA0M	MW-20C I	25.6	741.6	742.3 - 752.3
GA1M	MW-21C	54.5	718.4	772.5 - 717.5
GA2M	MW-22C	58.6	715.6	718.5 - 713.5
GA3M*	MW-23C*VI	34.7	720.3	725.9 - 720.9

"D" Groundwater Monitoring Wells

G05L	MW-5D I	38.6	739.9	749.5 - 739.5
G07L	MW-7D V	50.3	703.5	713.3 - 703.3
G17L*	MW-17D*VI	121.0	635.4	644.8 - 634.8
G18L*	MW-18D*VI	148.0	607.1	615.0 - 608.0
G19L*	MW-19D*VI	150.9	604.3	616.7 - 604.7

"E" Groundwater Monitoring Wells

G11D	MW-11E	100.1	655.0	665.8 - 655.8
G12D	MW-12E	87.5	666.2	676.3 - 666.3
G13D	MW-13E	110.7	642.5	645.8 - 635.8
G14D	MW-14E	111.1	647.7	654.7 - 644.7

River Sampling Points

S201	PR-1 VI	NA	NA	NA
S102	PR-2+VI	NA	NA	NA

Note:

"Ft bgs" refers to feet below ground surface.

"Ft MSL" refers to feet above mean sea level.

1. + - Denotes Upgradient Well
 2. * - Denotes GMZ Wells
 3. V - Analysis of Volatile Organic Compounds listed in Condition III.D.1
 4. I - Analysis of Inorganic constituents listed in Condition III.D.1
 5. NA - Not applicable
-
2. Construction of each monitoring well/piezometer must be in accordance with the "Monitoring Well Diagram" and "Well Completion Report" forms located on the Illinois EPA website, unless otherwise approved in writing by the Illinois EPA. All new monitoring wells/piezometers to be installed must be continuously sampled and logged on Illinois EPA boring logs contained in the "Field Boring Log" form on the Illinois EPA website, unless otherwise approved by the Illinois EPA.
 3. This Permit may be modified by the Permittee or the Illinois EPA in accordance with 35 IAC 705.128 if information becomes available that the current well spacing is not adequate to detect contamination from the hazardous waste management areas to the uppermost aquifer, including the construction of new wells geographically close to any previously abandoned wells.
 4. The Permittee must notify the Illinois EPA within 30 days in writing if any of the wells identified in Condition III.C.1 are damaged, or the structural integrity has been compromised. A proposal for the replacement of the subject well must accompany this notification. The well must not be plugged until the new well is online and monitoring data has been obtained and verified, unless the well is extremely damaged and would create a potential route for groundwater contamination. Prior to replacing the subject well, the Permittee must obtain written approval from the Illinois EPA regarding the proposed installation procedures and construction.
 5. Should any well become consistently dry or unserviceable; a replacement well must be provided within 10 feet of the existing well. This well must monitor the same geologic zone as the existing well and be constructed in accordance with the current Illinois EPA groundwater monitoring well construction standards at the time that the well is replaced. A well which is more than 10 feet from the existing well or does not monitor the same geologic zone must be approved by the Illinois EPA and designated a new well.

6. Monitoring well and piezometer construction must comply with the minimum standards set forth in 77 IAC Part 920 regulations. The Permittee must submit boring logs, construction diagrams, and data sheets from the installation and development of a new or replacement well to the Illinois EPA at the address below within 30 days of the date that installation of the well is completed. In addition, the Permittee must submit certification that plugging and abandonment of a well was carried out in accordance with the approved procedures to the Illinois EPA at the included address within 30 days of the date that the well is plugged and abandoned. All information should be submitted to the appropriate State Agencies.

Illinois Environmental Protection Agency
Bureau of Land - #33
Permit Section
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

7. All wells/piezometers must be clearly identified and must be equipped with protective caps and locks. Monitoring wells or piezometers located in high traffic areas must be protected with bumper guards.
8. All groundwater monitoring wells and piezometers not utilized in the approved groundwater monitoring system, but retained by the facility, must be constructed and maintained in accordance with 77 IAC Part 920 regulations. Monitoring wells and piezometers that are improperly constructed must be abandoned in accordance with Condition III.C.4.

D. GROUNDWATER PROTECTION STANDARD

1. The following hazardous constituents and their concentration limits comprise the groundwater protection standard for the groundwater monitoring wells found in Condition III.C.1. Total values must be used for comparison with groundwater quality standards. Samples collected during the semi-annual events of each year must be analyzed for the field parameters and the hazardous waste constituents below. The facility is not performing statistical analysis on analytical results of sampling; therefore, dissolved values are not required

Field Parameters	STORET Number	Reporting Units
pH	00400	Standard Units

Field Parameters	STORET Number	Reporting Units
Specific Conductance	00094	µmhos/cm
Temperature of Water Sample	00011	°F
Turbidity	45626	Ntus
Depth to Water (below land surface)	72019	Ft
Depth to Water (below measuring point)	72109	Ft
Elevation of Bottom of Well #	72020	Ft MSL
Elevation of Groundwater Surface	71993	Ft MSL
Elevation of Measuring Point (top of casing) ##	72110	Ft MSL

Note: # Shall be determined during the second sampling event of each year.
 ## Shall be surveyed once every five years, or at the request of the Illinois EPA, or whenever the elevation changes as required by Condition III.F.

Hazardous Constituents	STORET Number	Groundwater Concentration Limits (mg/L)	
		Class I	Class II
<u>Volatile Organic Compounds</u>			
Tetrachloroethylene	34475	0.005	0.025
Trichloroethene	39180	0.005	0.025
cis-1,2-Dichloroethene	77093	0.07	0.2
Vinyl Chloride	39175	0.002	0.01
<u>Inorganics (Totals)</u>			
Cadmium	01027	0.005	0.05
Chromium	01034	0.1	1.0
Lead	01051	0.0075	1.0
Nickel	01067	0.077	2.0

Hazardous Constituents	STORET Number	Surface Water Quality Standards for the Pecatonica River (mg/L) ^{1,2}		
		Acute	Chronic	Human Health
<u>Volatile Organic Compounds</u>				
Tetrachloroethylene	34475	1.2	0.15	-----

Trichloroethene	39180	12	0.94	0.025
cis-1,2-Dichloroethene	77093	14*	1.1*	-----*
Vinyl Chloride	39175	22	1.7	0.002

Inorganics (Totals)

Cadmium	01027	0.0371	0.0029	-----
Chromium	01034	4.5824	0.5462	-----
Lead	01051	0.4325	0.0907	-----
Nickel	01067	0.2249	0.0136	-----

Notes:

- * - Illinois EPA Bureau of Water (BOW) established values for 1,2-dichloroethylene applicable to cis-1,2-dichloroethene
- 1 - 35 IAC 302.208(e) contains values for inorganics
- 2 - 35 IAC 302.210, Subpart F contains values for organics
 - a. In addition to meeting the individual Class I groundwater protection standards indicated in the table above, an evaluation for mixtures of similar-acting substances must be conducted for non-carcinogenic substances, as required by 35 IAC 620.615.
 - b. In addition to meeting the individual Class I groundwater protection standards indicated in the table above, the requirements of 35 IAC 620.615 must be met for carcinogenic substances.
 - c. Calculations to meet Conditions III.D.1.a and 1.b must be based on the most current information to remain protective of human health and the environment.
- 2. Alternate concentration limits may be established where the Permittee can determine a constituent will not pose a substantial hazard to human health and the environment.
 - a. Where a hazardous constituent has a standard in 35 IAC Part 620, the facility must apply for an adjusted standard as outlined in Section 28.1 of the Act.
 - b. For those hazardous constituents without a 35 IAC Part 620 standard, the alternative concentration limit(s) proposed by the facility must be approved by the Illinois EPA.

3. The compliance period (post-closure period) during which the groundwater protection standard applies shall be extended until the Permittee demonstrates that the groundwater protection standard has not been exceeded at the point of compliance for three consecutive years.

E. GROUNDWATER CORRECTIVE ACTION PROGRAM

The Permittee performs monitored natural attenuation for groundwater impacted by the CAMU. The Permittee must conduct the corrective action program and perform groundwater monitoring detailed in this section, in accordance with the following:

1. The GMZ must be monitored and maintained. The GMZ is delineated by the designated groundwater monitoring wells found in Condition III.C.1.
 - a. The results of monitoring the GMZ must be submitted to the Illinois EPA semi-annually in accordance with the schedule found in Condition III.H.2.
 - b. The GMZ expires when all groundwater monitoring wells within the GMZ have attained the appropriate Class I or Class II concentration limits that comprise the groundwater protection standard found in Condition III.D.1.
 - i. The appropriate Class I or Class II concentration limits shall be considered attained when groundwater monitoring results meet the appropriate concentration limit for three consecutive years.
 - ii. In accordance with Condition III.B.2, the unconsolidated material has been designated as Class II: General Resource Groundwater.
 - iii. In accordance with Condition III.B.2, the dolomite aquifer has been designated Class I: Potable Resource Groundwater.
 - c. In accordance with Condition III.B.5, at this time, the establishment of the point of compliance will be postponed until such time as the monitoring wells at the facility have attained the appropriate concentrations limits that comprise the groundwater protection standard found in Condition III.D.1 and the GMZ expires.
 - i. At the time the GMZ expires in accordance with Condition III.E.1.b, the Permittee must submit a proposal for the establishment of a point of compliance which satisfies the regulatory requirements found in 35 IAC 724, Subpart F and reflects the current conditions at the site.

3. Elevation, as referenced to MSL, of the bottom of each monitoring well (STORET 72020), is to be reported at least annually. The mandatory measurement must be taken during the second semi-annual sampling event of each year.

G. SAMPLING AND ANALYSIS PROCEDURES

The Permittee must use the techniques and procedures described in Section C.8.4.3 of the approved permit application, except as modified, when obtaining and analyzing samples from the groundwater monitoring wells described in Condition III.C.1:

1. Samples must be collected using the techniques described in the Section C.8.4.3 of the approved permit application.
2. Samples must be preserved, shipped, and handled in accordance with the procedures specified in Section C.8.4.3 of the approved permit application.
3. Samples must be analyzed in accordance with the procedures specified in Section C.8.4.3 of the approved permit application. Groundwater analysis must be in accordance with the most current version of the applicable methods found in USEPA's "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," Third Edition (SW-846) and finalized updates.
4. Samples must be tracked and controlled using the chain-of-custody procedures specified in Section C.8.4.3 of the approved permit application.

H. REPORTING AND RECORDKEEPING

1. The Permittee must enter all monitoring, testing, and analytical data obtained in accordance with Conditions III.D, III.E, III.F, and III.G in the operating record.
2. Samples collected to meet the requirements of the groundwater monitoring program described in Conditions III.D, III.E, III.F, and III.G must be collected and reported as identified in the included table. All additional information required by the Groundwater Corrective Action Program (as specified in Conditions III.D, III.E, III.F, and III.G) must also be submitted to the Illinois EPA at the address listed in Condition III.C.6 in accordance with this schedule.

<u>Sampling Event of Calendar Year</u>	<u>Samples To Be Collected During the Months of</u>	<u>Results Submitted to the Agency by the Following</u>
First Quarter	January – February	April 15
Third Quarter	July – August	October 15

3. Groundwater surface elevation data, measured pursuant to Condition III.F.1, must be collected at least semi-annually and submitted to the Illinois EPA as identified in the table in Condition III.H.2.
4. The Permittee must report groundwater flow rate and direction in the uppermost aquifer, as required by Condition III.E.5 during the second semi-annual sampling event of each year.
5. The Permittee must report the surveyed elevation, as required by Condition III.F.2, of the top of the well casing (“stick-up”), referenced to MSL, in accordance with the following schedule:
 - a. For wells identified in Condition III.C.1, every five years (during the second semi-annual sampling event) or at the request of the Illinois EPA, or whenever the elevation changes.
 - b. For any new wells at the time of installation and reported in the as-built diagrams, subsequent measurements must be made every five years (during the second semi-annual sampling event), or at the request of the Illinois EPA or whenever the elevation changes.
6. Elevation of the bottom of each monitoring well identified in Condition III.C.1 as referenced to MSL, is to be reported at least annually. This measurement must be taken during the second semi-annual sampling event in accordance with Condition III.H.2.
7. Information required by Conditions III.H.2, III.H.3, III.H.5, and III.H.6 must be submitted in an electronic format. The information is to be submitted, as fixed-width text files formatted as found in the form, “Formatting Requirements for the 01 (and 02) Record of the Electronically Submitted Groundwater and Leachate Data” (LPC 160) located on the Illinois EPA webpage titled, “Electronic Reporting of Groundwater Data,” and in accordance with the schedule found in Condition III.H.2. Additional guidance regarding the submittal of the information in an electronic format can be found on the Illinois EPA website.

8. The Permittee must submit a completed "RCRA Facility Groundwater, Leachate, and Gas Reporting Form" (LPC 592) as a cover sheet for any notices or reports required by the Permit for identification purposes. Only one copy of the LPC 592 with wet signatures must accompany the submittal. However, the Permittee must submit one original copy of each notice or report submitted to Illinois EPA in paper format and (excluding the groundwater and leachate monitoring results submitted in an electronic format) a minimum of two electronic copies (one addressed to the Bureau of Land Permit Section, and one addressed to the regional Field Operation Section). Additional paper and electronic copies must be provided upon Illinois EPA request. The form is not to be used for permit modification requests.
9. The Permittee must report all information to the Illinois EPA in a form which can be easily reviewed. All submittals must contain tables of data drawings and text (as necessary) to accurately describe the information contained in the submittal.
10. The Permittee must submit a written report, in accordance with the schedule found in Condition III.H.2 which discusses the effectiveness of the Groundwater Corrective Action Program. At a minimum, the report must include, but is not limited to, the following:
 - a. Address the information requirements in Conditions III.D, III.E, III.F, and III.G.
 - b. Provide a discussion of any improvement in the quality of groundwater beneath the facility which has resulted from the corrective action.
11. If the Permittee determines that groundwater corrective action is not effective, the Permittee shall:
 - a. Notify the Illinois EPA in writing within seven days of the date that this determination is made.
 - b. Take actions as necessary to reestablish groundwater contaminant concentrations to meet the groundwater protection standards at the GMZ boundary as required by Condition III.D.
 - c. Submit a written report to the Illinois EPA within 30 days describing the actions taken to reestablish groundwater contaminant concentrations to meet the groundwater protection standards at the GMZ boundary.

In addition, the notification must contain information that demonstrates that groundwater contaminant concentrations are being adequately controlled.

- d. Submit a request for permit modification to the Illinois EPA within 90 days describing any changes which must be made to the Groundwater Corrective Action Program to ensure that groundwater is being adequately addressed.

I. REQUEST FOR PERMIT MODIFICATION

1. If the Permittee determines that the Groundwater Corrective Action Program no longer satisfies the requirements of 35 IAC 724.200, the Permittee must, within 90 days, submit an application for a permit modification to the Illinois EPA, Bureau of Land, Permit Section to make any appropriate changes to the program which will satisfy the regulations.
2. Conditions in this section of the Permit may be modified in accordance with 35 IAC 705.128 if there is cause for such modification, as defined in 35 IAC 702.184. Causes for modification identified in the section include, but are not limited to, alterations to the permitted facility, additional information which would have justified the application of different permit conditions at the time of issuance, and new regulations.

SECTION IV: CORRECTIVE ACTION

A. INTRODUCTION

1. In accordance with Section 3004(u) and (v) of the Resource Conservation and Recovery Act (RCRA) and 35 IAC 724.201, the Permittee must institute such corrective action as necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents from any Solid Waste Management Unit (SWMU) at its facility. This section contains the conditions which must be followed to ensure these requirements are met.
2. The Permittee must conduct, as appropriate: (1) a RCRA Facility Investigation (RFI) to characterize each Area of Concern (AOC) or SWMU of concern at the facility; (2) determine whether releases of hazardous wastes and hazardous constituents have occurred from each AOC or SWMU of concern, and if so, the nature and extent of the release(s); and (3) gather other data, as necessary, to be used in determining the need, scope and design of a Corrective Measures Program (CMP).
4. The Permittee must provide corrective action, also referred to as hazardous waste cleanups, as appropriate, for: (1) any newly discovered SWMUs and AOCs; and/or (2) future releases for existing SWMUs at the facility.
5. The Permittee must carry out interim measures in accordance with the terms, conditions and requirements of this permit, as appropriate, to address existing contamination at the facility until such time as a final corrective measure can be developed and implemented.
6. The requirements of 35 IAC Parts 620 and 742 must be met, when applicable, in establishing remediation objectives for hazardous waste cleanups. In addition, all hazardous waste cleanup efforts must meet the requirements of 35 IAC 724.201.
7. The Permittee must incorporate, as necessary, climate change resilience and adaptation considerations into the hazardous waste cleanups required at this facility.
8. All Illinois EPA final decisions regarding RCRA corrective action at this facility are subject to the appeal provisions of the Illinois Environmental Protection Act.
9. The Permittee must provide corrective action, as appropriate, for any future release from the SWMUs present at the Facility.

10. Illinois EPA's final actions on all corrective action-related submittals made by the Permittee are subject to the appeal provision of Section 39 and 40 of the Illinois Environmental Protection Act.

B. CORRECTIVE ACTION REQUIREMENTS

1. The Permittee must conduct and complete an RFI, as necessary, to determine whether releases of hazardous wastes and hazardous constituents have occurred from SWMUs/AOCs, and if so, the nature and extent of the release(s). In addition, the facility must gather other data, as necessary, to be used in determining the need, scope, and design of a Corrective Measures Program (CMP).
2. To date, the facility has conducted a substantial amount of investigation at this facility. Condition IV.C describes the facility's corrective action efforts that have been completed to date. Condition IV.D includes the corrective actions that must still be completed at the facility.
3. Additional investigations and remediation must be conducted, as necessary, to address any on-site contamination and any contamination which has migrated beyond the property boundaries. Corrective action is required for contamination resulting from former or current operation of the facility.
4. The Permittee must obtain "No Further Action" (NFA) determinations from Illinois EPA for any corrective action. NFA will be determined when sufficient information has been provided by the Permittee that the media of interest has been adequately remediated for the SWMUs/AOCs.
5. The historically identified SWMUs/HWMUs/AOCs are listed below.

Designation	Description	Current Status
HWMU	Lagoon 1	Sludge and contaminated soils treated and removed and placed in CAMU. GMZ to address groundwater contamination.
HWMU	Lagoon 2	Sludge and contaminated soils treated and removed and placed in CAMU. GMZ to address groundwater contamination. CAMU is located in the footprint of this HWMU. See Post-Closure

		Requirements in Section II of this Permit.
HWMU	Lagoon 3.	Sludge and contaminated soils removed and placed in CAMU. GMZ to address groundwater contamination. CAMU is located in the footprint of this HWMU. See Post Closure Requirements in Section II of this Permit.
HWMU	Shawnee Building.	Contaminated soils/concrete was excavated and placed in CAMU. Clean fills in excavated area.
SWMU	Cyanide Treatment Vault.	Contaminated soils was excavated and placed in CAMU. Clean fills in excavated area. An engineered barrier was required.
SWMU	Lagoon 0	Sludge and contaminated soils treated, excavated, and placed in CAMU. GMZ to address groundwater contamination
SWMU	Lagoon 1A	Sludge and contaminated soils treated, excavated, and placed in CAMU. GMZ to address groundwater contamination.
SWMU	Wetland Soils Areas (1, 1A,2 and 3)	Contaminated soils were removed and placed in CAMU. Clean fills were placed in excavated areas.
AOC	Outfall Piping Area	Outfall pipeline was abandoned, soils excavated and paced in CAMU.
AOC	Wastewater Release	Contaminated soils due to release of contaminated wastewater from the CAMU construction were excavated was placed in the CAMU.

6. As described in Condition IV.C below, HWMUs, SWMUs, and AOC above obtained no further action for soils based on the described remedial activities upon the closure of the CAMU and commencing of post-closure care as required in Section II of this Permit.
7. Groundwater corrective action responsibilities, which are described in Section III of this Permit, must be completed to obtain an NFA at the facility.
8. The indoor inhalation exposure route was incorporated into 35 IAC Part 742 and became effective in July 2013. The Permittee must address the indoor inhalation exposure route at the facility as necessary in accordance with the requirements of 35 IAC Part 742 and obtain an NFA determination.

C. CLOSURE AND CORRECTIVE ACTION EFFORTS COMPLETED TO DATE

Remediation activities for the four HWMUs (Lagoon 1 Lagoon 2, Lagoon 3, the Shawnee Building); four SWMUs (Lagoon 0, Lagoon 1A, Cyanide Treatment Vault and Wetlands Areas) and two Areas of Concern (the Outfall Pipe and Wastewater Release Area) were performed in accordance with the final RCRA closure plan dated December 2, 1999 and subsequent modifications. A CAMU was established at the former location of Lagoons 2 and 3 for the placement of contaminated soil generated by remediation activities performed by MPC in accordance with the initial Permit (B-167). Remediation efforts were performed as described in the July 2001 CAMU Landfill Construction Documentation Report and the final August 2001 Closure Documentation Report, which were approved by Illinois EPA on May 7, 2009. A summary of the completed activities follows.

1. Lagoon 0, Lagoon 1, Lagoon 1A, Lagoon 2 , Lagoon 3
 - a. Waste sludges in the lagoons were dried, solidified and/or treated. After removal of waste, at least 1 foot of the base and 1 foot of the interior side slopes were excavated. Additional excavation occurred at the lagoons shown in Attachment E, Drawing No. 2 and as described in the summary table provided in Attachment D. The table summarizes for each lagoon, the type of wastes removed, the remedial removal and excavation activities and the remediation quantities.
 - b. The sludge/soil removal effort described above first started in Lagoons 2 and the removed sludge/soil was temporarily placed in one of the other lagoons. Once the sludge/soil was removed from Lagoons 2 and 3, a CAMU was constructed within the footprint of these lagoons. The excavated sludge/soil from the lagoons was placed in the CAMU.

- c. The concentrations of contaminants remaining (if any) in the soil left in-place were reported in the Modern Plating CAMU Landfill Construction Document Report dated July 2001, Table 5.1.
- d. After waste was removed from Lagoons 0, 1 and 1A, each area was backfilled with clean soils compacted in lifts and the surface graded to drain.
- e. A Groundwater Management Zone (GMZ) was established to address contaminated groundwater at the MPC facility. The requirements for the GMZ are specified in Section III of this permit.

2. Cyanide Treatment Vault Area

- a. In the Cyanide Treatment Vault Area, 2 feet of contaminated soil was excavated from the floor and sidewalls of the former vault (approximately 200 cubic yards) and placed in the CAMU.
- b. After excavation activities, soil samples were obtained in the lagoon areas and Cyanide Treatment Vault Area to define the amount of residual contamination.
- c. After waste was removed, this area was backfilled with clean soil, compacted in lifts and the surface graded to drain.
- d. An engineered barrier was placed over this area.

3. Shawnee Building

Three areas at the Shawnee Building were used for storage of hazardous waste. As part of closure, an estimated 30 cubic yards of contaminated soil in 25-foot by 35-foot were removed and placed in the on-site CAMU. This remedial action achieved the remedial objectives and met the closure requirements of 35 IAC 725 Subpart G. After waste was removed, this area was backfilled with clean soil compacted in lifts and the surface graded to drain.

4. Wetland Area

Approximately 2,905 cubic yards of contaminated soils were removed from four areas in the Wetland Area and placed in the on-site CAMU. Wetland 1 and 1A are off-site in the low area northeast of monitoring well MW-13 and Lagoon 1A. Wetland II and Wetland III are located on-site immediately north of Lagoon 2. Additional excavation occurred in the areas shown in F and described in

Attachment D. The remedial action achieved the remedial objectives and met the requirements of 35 IAC 724.201. The wetland areas were returned to their previous grade by backfilling. No further action is necessary in the Wetland Area.

5. Outfall Pipe

An abandoned outfall pipe from the wastewater treatment plant (WWTP) to the Pecatonica River was investigated as a result of a condition in Illinois EPA's December 2, 1999 closure plan approval letter. The investigation lead to the excavation of an area 30 feet long, 10 feet wide and 10 feet deep. Contaminated soil from this area was placed in the CAMU. Remediation efforts were determined to be adequate in Illinois EPA's August 8, 2000 letter with the condition that an institutional control be placed restricting future land use at the facility to commercial/industrial activities.

6. Wastewater Release

During construction of the CAMU, a pipeline that transfers wastewater from the manufacturing plant to the Waste Water Treatment Plant (WWTP) ruptured (Illinois EPA Incident No. 20001377). Approximately 3 cubic yards of soil were contaminated as a result of the spill and contaminated soil was removed and placed in the CAMU. Remediation efforts were determined to be adequate to address this incident.

7. Environmental Land Use Control

The Modern Plating facility in Freeport, Illinois (PIN 14-32-251-011; 14-32-276-001; 14-32-402-004; 14-32-426-003; 14-32-402-019) is subject to an Environmental Land Use Control (ELUC) recorded with the Stephenson County Clerk/Recorder on June 1, 2010 (Document Number 201000111587). A drawing showing the boundary of the ELUC is provided in Attachment E. This ELUC shall apply in perpetuity to the facility and shall not be released until: (1) Illinois EPA determines that there is no longer a need for this ELUC; (2) Illinois EPA, upon written request from the property owner and in accordance with 35 IAC 742.1010, issues an amended certification of closure or a permit modification approving modification/elimination of the ELUC requirements; and (3) a release or modification of the ELUC is filed on the chain of title for the Property.

- a. The recorded ELUC places the following restrictions on the subject facility:
 - i. The facility may only be used for commercial/industrial activities in the future;

- ii. An engineered barrier must be maintained over the Cyanide Treatment Vault, the Outfall Piping Area and Lagoons 0, 1, 1A, 2 and 3;
- iii. The groundwater under the facility may not be used as a potable supply of water;
- iv. A site safety plan meeting the requirements of 29 CFR 1910 and 1926 must be developed and implemented any time construction/excavation work takes place beneath the engineered barriers mentioned above;
- v. Any soil removed from beneath the engineered barriers mentioned above must be properly managed in accordance with 35 IAC, Subtitle G: Waste Disposal.

D. CORRECTIVE ACTION STILL TO BE COMPLETED

- 1. In July 2013, 35 IAC Part 742 was modified to include the indoor inhalation exposure route. The facility must assess this exposure route at the facility as volatile organic compounds (VOCs) have been managed and detected at the site. Thus, the Permittee must meet the requirements of 35 IAC Part 742 to address the indoor inhalation exposure routes on a site-wide basis to ensure compliance.
- 2. Any groundwater contamination at the facility must be addressed, as necessary, to meet the requirements of 35 IAC Parts 620 and 742. Note that 35 IAC Part 620 was updated in March 2025.
- 3. Evaluation, investigation, and remediation, as necessary, must be conducted to meet the requirements of Conditions IV.D.1 and 2 above for the SWMUs/HWMUs/AOCs identified in Condition IV.B.5 and within the GMZ established for the facility.

E. CORRECTIVE MEASURE REQUIREMENTS

- 1. If it is determined that corrective measures must be taken at a SWMU or AOC, then the Permittee must implement a CMP for such SWMUs in general accordance with the procedures set forth in Attachment G. The corrective measures implemented by the Permittee must be sufficient to ensure the appropriate requirements of 35 IAC Parts 302, 620, 724, and 742 are met.

2. The types of corrective measures which may be implemented include, but are not limited to:
 - a. Removal of the contaminants or the contaminated media so that the remaining media meet remediation objectives developed in accordance with 35 IAC Part 742;
 - b. Closing the SWMU as a landfill by establishing a proper final cover over the SWMU and then providing proper long-term monitoring/maintenance/management of: (1) leachate; (2) subsurface gas; (3) final cover system; and (4) groundwater;
 - c. Establishing engineered barriers to restrict exposure to the contaminants remaining at the SWMU or AOC (necessary to certain remediation objectives developed in accordance with 35 IAC Part 742);
 - d. Establishing institutional controls to restrict activities at the facility, as necessary, to support remediation objectives established in accordance with 35 IAC Part 742.

3. The CMP described in Attachment G consists of five phases:
 - a. Phase I--conceptual design of the selected corrective measure;
 - b. Phase II--development of the final design plans for the corrective measure, including installation and operation/maintenance plans;
 - c. Phase III--actual construction/installation/implementation of the corrective measure;
 - d. Phase IV—operation/maintenance/monitoring, as necessary, of the corrective measure to ensure it is being properly implemented and is properly protecting human health and the environment.
 - e. Phase V--demonstration/verification that the corrective measure has been completed and that the established remediation objectives have been achieved.
 - f. Phases may be combined or skipped, depending on the actual corrective measure selected. The overall CMP implemented at a given SWMU must: (1) be logical in nature; and (2) allow for Illinois oversight and approval throughout the entire process. As such, it will be necessary for the

Permittee to submit workplans/reports regarding all aspects of corrective measures for Illinois EPA review and approval prior to carrying out any corrective measure activity.

4. A Phase I CMP report, or its equivalent, must be submitted to Illinois EPA within ninety (90) days of the date that Illinois EPA notifies the Permittee of the need for a CMP.
5. Subsequent CMP reports must be submitted to Illinois EPA for review and approval in accordance with a schedule approved by Illinois EPA.
6. Once all corrective measures have been completed, a report must be developed documenting all efforts and results associated with the completed measure, including, as appropriate, information demonstrating the approved remediation objectives for the project have been achieved.

F. REQUIREMENTS FOR ADDRESSING NEWLY IDENTIFIED SWMU(s) AND AREA(s) OF CONCERN (AOCs)

1. The Permittee must notify the Illinois EPA in writing of any newly identified SWMU and/or AOCs discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than 30 days after discovery. The notification shall provide the following information, as available:
 - a. The location of the newly identified SWMU and/or AOC in relation to other SWMUs on a scaled map or drawing;
 - b. The type and past and present function of the unit;
 - c. The general dimensions, capacities, and structural description of the unit (available drawings and specifications provided);
 - d. The period during which the unit was operated;
 - e. The specifics on all materials, including but not limited to, wastes and hazardous constituents, that have been or are being managed at the SWMU/AOC, to the extent available; and
 - f. The results of any relevant available sampling and analysis which may aid in determining whether releases of hazardous wastes or hazardous constituents have occurred or are occurring from the unit.

2. Within 90 days after receipt of the Illinois EPA's request for a SWMU Assessment Plan (Plan), the Permittee must submit a Plan to the Illinois EPA for review and approval.
3. After the Permittee submits the Plan, the Illinois EPA shall either approve, conditionally approve, or disapprove the Plan in writing. If the Plan is approved, the Permittee must begin to implement the Plan within 45 days of receiving such written notification or according to the terms and schedule established within the Plan and any conditions placed on it. If the Plan is disapproved, the Illinois EPA shall notify the Permittee in writing of the Plan's deficiencies and specify a due date for submittal of a revised Plan.
4. The Permittee must submit a report documenting the results of the approved Plan to the Illinois EPA in accordance with the schedule in the approved Plan. The SWMU Assessment Report must describe all results obtained from the implementation of the approved Plan.
5. Additional investigation plans and reports must be submitted to and approved by the Illinois EPA, as necessary, to ensure the nature and extent of contamination at the SWMU/AOC is adequately characterized. Once the contamination is characterized, the Permittee must develop remedial objectives for the SMWU/AOC in accordance with 35 IAC Parts 742 and 620; such objectives are subject to the Illinois EPA review and approval.
6. The Permittee must implement a CMP, as necessary, to properly address any contamination encountered during the assessment. Guidance regarding the implementation of this program will be provided at the time the Illinois EPA notifies the Permittee of the need for such a program.
7. All efforts carried out at newly identified SWMU/AOCs must meet the requirements of 35 IAC 724.201.

G. FUTURE RELEASES FROM SWMUs

There exists a potential that a release may occur in the future from SWMUs identified in the RCRA Facility Assessment (RFA) which did not require any corrective action at the time that the RFA or RFI was completed. If the Permittee discovers that a release has occurred from such a SWMU in the future, then the Illinois EPA must be notified of this release within thirty (30) days after its discovery following the procedures set forth in Condition IV.E.1. Additional investigation and, as necessary, corrective measures efforts at this SWMU must be carried out in accordance with the procedure set forth in

Condition II.H. The results of all corrective action efforts required by this condition must meet the requirements of 35 IAC 724.201.

H. INTERIM MEASURES/STABILIZATION

The Permittee must carry out interim measures/stabilization activities to prevent or mitigate the migration of a release of hazardous substances into the environment, and to provide adequate protection to human health and the environment.

1. At any time during the corrective action process, the Permittee may initiate interim measures for the purpose of preventing continuing releases and/or mitigating the results of releases and/or mitigating the migration of hazardous wastes or hazardous constituents. It shall not be necessary to conduct all phases of a RFI or a Corrective Measures Study (CMS) prior to implementing an interim measure if the Illinois EPA and the Permittee agree that a problem can be corrected, or a release cleaned up, without additional study and/or without a formal CMS
2. Prior to implementing any interim measures, the Permittee must submit detailed information regarding the proposed interim measure to the Illinois EPA for approval. This information shall include, at a minimum:
 - a. Objectives of the interim measures; how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long-term solution at the facility;
 - b. Design, construction, and maintenance requirements;
 - c. Schedules for design and construction; and
 - d. Schedules for progress reports.
3. If the Illinois EPA determines that a release cannot be addressed without additional study and/or a formal CMS, then the Illinois EPA will notify the Permittee that these must be performed. Any proposal made under this provision or any other activity resulting from such proposal, including the invocation of dispute resolution, shall not affect the schedule for implementation of the other corrective action efforts being carried out at the facility or of any other portion of the permit.

4. If the Illinois EPA determines that interim measures are necessary to protect human health or the environment, the Permittee will be notified by way of a permit modification.
 - a. Consistent with the annual reporting requirements of this permit, the Permittee shall submit a report assessing the effectiveness of any interim measures being carried out in accordance with this permit. Based on a review of this report, the Illinois EPA reserves the right to require additional interim measures be carried out if it is determined that the interim measure is unable to protect human health and the environment. This annual report should at a minimum contain the following information regarding each system which comprises the interim measure:

A discussion of each system's operation during the year. This discussion should address: (1) actual daily, weekly and monthly flow rates through each system; (2) any periods when the systems were not operating; and (3) deviations from the design operating procedures for the system (such as problems with drawing an adequate vacuum, downtime due to equipment failure, etc.);
 - b. Results of all monitoring efforts carried out during the year;
 - c. A discussion of the effectiveness of the system supported as appropriate with data and calculations; and
 - d. Recommended changes, if any, which should be made to the system to improve its effectiveness.
5. The Illinois EPA reserves the right to require the Permittee to remove or treat soil if the Illinois EPA determines that contaminants are present in the soils at levels such that the remediation system is unable to protect human health and the environment. Remediation objectives for corrective measures will be established by the Illinois EPA at a later date.
6. The interim measure approved for a SWMU may not be sufficient to meet the final requirements for corrective action for remediation for the unit. The adequacy of the interim measure will be addressed upon the Illinois EPA review and approval of the RFI reports and the CMP, as required by this permit. As such, the Permittee may be required to expand this interim measure as necessary to address existing or additional contamination detected through the RFI.

7. The Illinois EPA reserves the right to require revision and modification of the interim measures implemented by the facility should it be determined by the Illinois EPA through information obtained through facility monitoring that the interim measures approved by this portion of the permit are ineffective in protecting human health and the environment.

I. FINANCIAL ASSURANCE FOR CORRECTIVE ACTION

In accordance with 35 IAC 724.201, financial assurance must be established while completing required corrective actions at solid waste management units:

1. The Permittee must prepare a cost estimate for the completion of any corrective action required under this permit, in order to provide financial assurance for completion of corrective action, in order to provide financial assurance for the approved amount of that cost estimate within 90 days of the date of the effective date of this permit, as required under 35 IAC 724.201(b). Such a cost estimate must be based upon the cost of contamination investigations and assessments for the SWMU(s), and design, construction, operation, inspection, monitoring, and maintenance of the corrective measure(s) to meet the requirements of 35 IAC 724.201 and this permit. These estimates must be based upon third party costs. The revised cost estimate for corrective action must be submitted to the Illinois EPA as necessary.
3. The Permittee must demonstrate continuous compliance with 35 IAC 724.201 by providing documentation of financial assurance using a mechanism specified in 35 IAC 724.243, in at least the amount of the cost estimate required under Condition V.I.1 the words "completion of corrective action" shall be substituted for "closure and/or post-closure", as appropriate in the financial instrument specified in 35 IAC 724.251. The documentation shall be submitted to the Illinois EPA within 60 days after the Illinois EPA's approval of the initial or revised cost estimates required under Condition V.I.1 and as required by the Illinois EPA. The Illinois EPA may accept financial assurance for completion of corrective action in combination with another financial mechanism that is acceptable under 35 IAC 724.246 at its discretion.
4. It must be noted that cost estimates and financial assurance must be provided for the operation of the groundwater remediation system required by Section III of this permit as such a system is necessary to meet the requirements of 35 IAC 724.201.

5. Financial assurance for corrective action must be updated, as necessary, to reflect the current status of the hazardous waste cleanup program at this facility. In addition, this financial assurance must be adjusted annually for inflation.

SECTION V: SPECIAL CONDITIONS

A. 39i CERTIFICATION

The Permittee shall submit a current 39i certification and supporting documentation with all applications for a permit.

B. COMPLIANCE SCHEDULE, PERMIT MODIFICATION

1. The facility must submit to Illinois EPA for review and approval the following information as a Class 1* permit modification request(s) within 90 days of the effective date of this Permit:
 - a. An updated EPA Form 8700-23 RCRA Part A application. Both new and existing facilities that treat, store, or dispose of regulated hazardous waste are required to submit a RCRA Hazardous Waste Part A Permit Application. This form must include all hazardous wastes that the Permittee currently generates at the facility. (*Section A.1 of the approved permit application*)
 - b. Identification and detailed descriptions of any hazardous waste management units (HWMUs) and solid waste management units (SWMUs) at the facility. Include the locations on the required facility layout map as described in Condition V.B.1.c below.
 - c. Scaled facility layout map(s) that includes, but not limited to, the following items (*Section B.2 of the approved permit application*):
 - i. The general and operational facility features, such as existing buildings (e.g., the Leachate Pump Building), current and past waste management units (HWMUs and SWMUs), containment area(s), any access roads, gates, fences, and other structures or features that should be included; and
 - ii. Corrective Action Management Unit (CAMU) boundaries, the Leachate Pump Building (adjacent to the CAMU), the fences and

warning sign locations for CAMU, and the groundwater monitoring well locations.

- d. The facility's most recent contingency plan revision for operation of the CAMU. This plan must be submitted in accordance with 35 IAC 724.153. (*Referenced throughout the approved permit application*).
- e. Additional documentation describing the procedures and/or maintenance plan for CAMU Post-Closure Care activities. Update and revise Tables B-1 and B-2 of the approved permit application (which are included as Attachment A of this Permit) to address the following:
 - i. "Cleaning of interior piping annually", is included in Table B-2, but not included in Table B-1;
 - ii. Description and procedure for "Check for Leaks" in Table B-1 for the leachate collection system;
 - iii. Descriptions and frequency of maintenance necessary for the equipment for both leachate detection and collection system. Tables B-1 and B-2 indicate to refer to O&M Plan only. Indicate a minimum frequency of the maintenance and calibration check schedule;
 - iv. Procedures and safety precautions necessary for post-closure care activities, which include, but are not limited to, all communication devices, monitoring, safety, spill control, decontamination, and emergency equipment, as well as operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazard; and
 - v. Identify and include, in Table B-1, a timeframe to complete each activity (e.g., identify a particular month or quarter, etc.).
- f. The most recent documentation for annual cleaning of the leachate collection and leak detection systems with a high-pressure jetting system, described as a required maintenance activity in Appendix Q, Item 12.4 of the approved permit application (Section E.8.3 of the approved permit application). If a high-pressure jetting system cannot be used to clean

the pipes annually, the Permittee must include an alternative method of annual cleaning in the document prepared under Condition V.B.1.e.

- g. A workplan to modify the current leachate system such that the leachate depth over the liner does not exceed one foot (30-cm), in accordance with 35 IAC 724.401(c)(2) and Condition II.E.7.d of this Permit. This workplan must address, but is not limited to the following:
 - i. The leachate pump system is activated at one foot (30-cm) of leachate accumulation (*Section E.3.2 of the approved permit application*);
 - ii. The pump alarm is triggered after an additional one foot (30-cm) leachate has accumulated from the pump activation point (*Section D.2 of the approved permit application*); and
 - iii. Provide all relevant engineering prints as part of this proposed workplan. Include updates to existing prints with any updates reflecting proposed changes.
 - h. A revised post-closure cost estimate and financial assurance to meet the required minimum of thirty (30) years post-closure care costs for the CAMU, as stated in Conditions II.G.1 and 2. All cost estimates must be updated to the current year. (*Sections E.11 and F.6 and Appendix N of the approved permit application*)
2. Within 180 days of the effective date of this Permit, the facility must submit to Illinois EPA for review and approval the following as a Class 1* permit modification request(s).
- a. An updated survey plat indicating the location and dimensions of the CAMU with respect to permanently surveyed benchmarks. This plat must be prepared and certified by a professional land surveyor). (*Sections II.E and II.F of the approved permit application*)
 - b. The following monitored natural attenuation parameters have been added to the facility's sampling list: ethene/ethane/methane, dissolved

oxygen, and oxygen-reduction. (*Section C.8.4.1 of the approved permit application*)

The facility must include the sampling and analysis of these additional parameters during the next sampling event.

- c. Accurate and consistent horizontal and vertical groundwater gradients. (*Section E.1.2 of the approved permit application*)
- d. A revised Section C.8.4.7 to the approved permit application to reference the specific approval letter in which the Illinois EPA approved a demonstration for the groundwater ingestion route in accordance with 35 IAC 742.925 or remove the reference. (*Section C.8.4.7 of the approved permit application*)
- e. A discussion to address the screened intervals of facility wells compared to well(s) accessing potable water at individual or community water supply wells, if identified. (*Section C.5 of the approved permit application*)
- f. Propose low-flow sampling methods, such as bladder pumps. (*Section C.8.4.3 of the approved permit application*)
- g. A demonstration that cyanide does not need to be added to the hazardous constituent list monitored in groundwater in accordance with Section III.

C. COMPLIANCE SCHEDULE, CORRECTIVE ACTION

Within 180 days of the effective date of this Permit, the facility must submit to Illinois EPA, for review and approval, a RCRA facility investigation (RFI) work plan to address indoor inhalation exposure pathway, in accordance with 35 IAC Part 742, Conditions IV.B.8 and IV.D.1, and Attachment G of this Permit. This workplan must include a proposed cost estimate for the proposed activities to meet the requirements in Condition IV.I. This work plan should be submitted as a corrective action submittal, not a permit modification request.

SECTION VI: STANDARD CONDITIONS FOR POST-CLOSURE CARE

GENERAL REQUIREMENTS

1. **EFFECT OF PERMIT.** The existence of a RCRA Permit must not constitute a defense to a violation of the Act or Subtitle G, except for prohibitions against development, modification, or operation without a Permit. Issuance of this Permit does not convey property rights or any exclusive privilege. Issuance of this Permit does not authorize any injury to persons or property or invasion of other private rights, or infringement of State or local law or regulations. (35 Ill. Administration Code (IAC) 702.181)
2. **PERMIT ACTIONS.** This Permit may be modified, reissued, or revoked for cause as specified in 35 IAC 703.270 through 703.273 and Section 702.186. The filing of a request by the Permittee for a permit modification or reissuance, or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. (35 IAC 702.146)
3. **SEVERABILITY.** The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Permit must not be affected thereby. (35 IAC 705.202)
4. **PERMIT CONDITION CONFLICT.** In case of conflict between a special permit condition and a standard condition, the special condition will prevail. (35 IAC 702.160)
5. **DUTY TO COMPLY.** The Permittee must comply with all conditions of this Permit except for the extent and for the duration such noncompliance is authorized by an emergency permit. Any Permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of the Act and is grounds for enforcement action; permit revocation or modification; or for denial of a permit renewal application. (35 IAC 702.141 and 703.242)
6. **DUTY TO REAPPLY.** If the Permittee wishes to continue an activity allowed by this Permit after the expiration date of this Permit, the Permittee must apply for a new Permit at least 180 days before this Permit expires, unless permission for a later date has been granted by the Illinois EPA. (35 IAC 702.142 and 703.125)
7. **PERMIT EXPIRATION.** This Permit and all conditions herein will remain in effect beyond the Permit's expiration date if the Permittee has submitted a timely, complete

application (see 35 IAC 703.181-703.209) and, through no fault of the Permittee, the Illinois EPA has not issued a new Permit as set forth in 35 IAC 702.125)

8. **NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE.** It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit. (35 IAC 702.143)
9. **DUTY TO MITIGATE.** In the event of noncompliance with the Permit, the Permittee must take all reasonable steps to minimize releases to the environment and must carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. (35 IAC 702.144)
10. **PROPER OPERATION AND MAINTENANCE.** The Permittee must at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory, and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the Permit. (35 IAC 702.145)
11. **DUTY TO PROVIDE INFORMATION.** The Permittee must furnish to the Illinois EPA, within a reasonable time, any relevant information which the Illinois EPA may request to determine whether cause exists for modifying, revoking, and reissuing or terminating this Permit, or to determine compliance with this Permit. The Permittee must also furnish to the Illinois EPA, upon request, copies of records required to be kept by this Permit. (35 IAC 702.148)
12. **INSPECTION AND ENTRY.** The Permittee must allow an authorized representative of the Illinois EPA, upon the presentation of credentials and other documents as may be required by law, to:
 - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;

- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and
 - d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances, or parameters at any location. (35 IAC 702.149)
13. MONITORING AND RECORDS. (35 IAC 702.150)
- a. Samples and measurements taken for the purpose of monitoring must be representative of the monitored activity. The method used to obtain a representative sample of the waste must be the appropriate method from 35 IAC 721, Appendix A. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Third Edition (SW-846) and finalized updates; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, latest versions; or an equivalent method as specified in the approved waste analysis plan.
 - b. The Permittee must retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this Permit, and records of all data used to complete the application for this Permit for a period of at least three years from the date of the sample, measurement, report, or application. These periods may be extended by request of the Illinois EPA at any time. The Permittee must maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well.
 - c. Records of monitoring information must include:
 - i. The date(s), exact place, and time of sampling or measurements;
 - ii. The individual(s) who performed the sampling or measurements;
 - iii. The date(s) analyses were performed;
 - iv. The individual(s) who performed the analyses;

- v. The analytical technique(s) or method(s) used; and
 - vi. The result(s) of such analyses. (35 IAC 702.150)
14. **REPORTING PLANNED CHANGES.** The Permittee must give written notice to the Illinois EPA as soon as possible of any planned physical alterations or additions to the permitted facility. In general, proposed changes to the facility will need to be submitted to the Illinois EPA as permit modification request that complies with the requirements of 35 IAC 703.280. (35 IAC 702.152(a))
15. **CONSTRUCTION CERTIFICATION.** For a new hazardous waste management (HWM) facility, the Permittee may not commence treatment, storage, or disposal of hazardous waste; and for a facility being modified the Permittee may not treat, store, or dispose of hazardous waste in the modified portion of the facility, until:
- a. The Permittee has submitted to the Illinois EPA by certified mail or hand delivery a letter signed by the Permittee and a qualified Illinois licensed professional engineer stating that the facility has been constructed or modified in compliance with the Permit; and
 - b. The Illinois EPA has inspected the modified or newly constructed facility and finds it is in compliance with the condition of the Permit; or
- If, within 15 days of the date of submission of the letter in paragraph (a), the Permittee has not received notice from the Illinois EPA of its intent to inspect, prior inspection is waived, and the Permittee may commence treatment, storage, or disposal of hazardous waste. (35 IAC 703.247)
16. **ANTICIPATED NONCOMPLIANCE.** The Permittee must give advance notice to the Illinois EPA of any planned changes in the permitted facility or activity which may result in noncompliance with Permit requirements, regulations, or the Act. (35 IAC 702.152(b))
17. **TRANSFER OF PERMITS.** This Permit may not be transferred by the Permittee to a new owner or operator unless the Permit has been modified or reissued pursuant to 35 IAC 703.260(b) or 703.272. Changes in the ownership or operational control of a facility must be made as a Class 1 modification with the prior written approval of the Illinois EPA. The new owner or operator must submit a revised permit application no later than 90 days prior to the scheduled change. (35 IAC 703.260)

18. **MONITORING REPORTS.** Monitoring results must be reported at the intervals specified in the Permit. (35 IAC 702.152(d))
19. **COMPLIANCE SCHEDULES.** Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this Permit must be submitted no later than specified in 35 IAC 702.162. (35 IAC 702.152(e))
20. **TWENTY-FOUR HOUR REPORTING.**
 - a. The Permittee must report to the Illinois EPA any noncompliance with the Permit which may endanger health or the environment. Any such information must be reported orally within 24 hours from the time the Permittee becomes aware of the following circumstances. This report must include the following:
 - i. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
 - ii. Information concerning the release or discharge of any hazardous waste or of a fire or explosion at the HWM facility, which could threaten the environment or human health outside the facility.
 - b. The description of the occurrence and its cause must include:
 - i. Name, address, and telephone number of the owner or operator;
 - ii. Name, address, and telephone number of the facility;
 - iii. Date, time, and type of incident;
 - iv. Name and quantity of material(s) involved;
 - v. The extent of injuries, if any;
 - vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and

- vii. Estimated quantity and disposition of recovered material that resulted from the incident.
 - c. A written submission must also be provided within five days of the time the Permittee becomes aware of the circumstances. The written submission must contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times and if the noncompliance has not been corrected; the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Illinois EPA may waive the five day written notice requirement in favor of a written report within 15 days. (35 IAC 702.152(f) and 703.245(b))
- 21. **OTHER NONCOMPLIANCE.** The Permittee must report all instances of noncompliance not otherwise required to be reported under Standard Conditions 18, 19, and 20, at the time monitoring reports, as required by this Permit, are submitted. The reports must contain the information listed in Standard Condition 20. (35 IAC 702.152(g))
- 22. **OTHER INFORMATION.** Where the Permittee becomes aware that it failed to submit any relevant facts in the permit application or submitted incorrect information in a permit application or in any report to the Illinois EPA, the Permittee must promptly submit such facts or information. (35 IAC 702.152(h))
- 23. **SUBMITTAL OF REPORTS OR OTHER INFORMATION.** All written reports or other written information required to be submitted by the terms of this Permit must be sent to:
 - Illinois Environmental Protection Agency
 - Bureau of Land -- #33
 - Permit Section
 - 2520 West Iles Avenue
 - Post Office Box 19276
 - Springfield, Illinois 62794-9276
- 24. **SIGNATORY REQUIREMENT.** All permit applications, reports or information submitted to the Illinois EPA must be signed and certified as required by 35 IAC 702.126. (35 IAC 702.151)
- 25. **CONFIDENTIAL INFORMATION.** Any claim of confidentiality must be asserted in accordance with 35 IAC 702.103 and 35 IAC Part 161.

26. **DOCUMENTS TO BE MAINTAINED AT FACILITY SITE.** The Permittee must maintain at the facility, until post-closure is complete, the following documents and amendments, revisions, and modifications to these documents:
- a. Post-closure plan as required by 35 IAC 724.218(a) and this Permit;
 - b. Cost estimate for post-closure care as required by 35 IAC 724.244(d) and this Permit;
 - c. Operating record as required by 35 IAC 724.173 and this Permit; and
 - d. Inspection schedules as required by 35 IAC 724.115(b) and this Permit

GENERAL FACILITY STANDARDS

27. **GENERATOR REQUIREMENTS.** Any hazardous waste generated at this facility must be managed in accordance with the generator requirements at 35 IAC Part 722.
28. **SECURITY.** The Permittee must comply with the security provisions of 35 IAC 724.114(b) and (c).
29. **GENERAL INSPECTION REQUIREMENTS.** The Permittee must follow the approved inspection schedule. The Permittee must remedy any deterioration or malfunction discovered by an inspection as required by 35 IAC 724.115(c). Records of inspections must be kept as required by 35 IAC 724.115(d).
30. **CLOSURE REQUIREMENTS FOR ACCUMULATION AREAS.** The Permittee must close containers storage areas, tanks, drip pads, or containment buildings used for the accumulation of on-site generated hazardous waste in accordance with the requirements identified at 35 IAC 722.117(a)(8).

PREPAREDNESS AND PREVENTION

31. **DESIGN AND OPERATION OF FACILITY.** The Permittee must maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. (35 IAC 724.131)

RECORD KEEPING

32. **OPERATING RECORD.** The Permittee must maintain a written operating record at the facility in accordance with 35 IAC 724.173.

POST-CLOSURE

33. **CARE AND USE OF PROPERTY.** The Permittee must provide post-closure care for the facility as required by 35 IAC 724.217 and in accordance with the approved post-closure plan.
34. **AMENDMENT TO POST-CLOSURE PLAN.** The Permittee must amend the post-closure plan whenever a change in the facility operation plans, or facility design affects the post-closure plan or when an unexpected event has occurred which has affected the post-closure plan pursuant to 35 IAC 724.218(d).
35. **COST ESTIMATE FOR POST-CLOSURE.** The Permittee's original post-closure cost estimate, prepared in accordance with 35 IAC 724.244, must be:
- a. Adjusted for inflation either 60 days prior to each anniversary of the date on which the first post-closure cost estimate was prepared or if using the financial test or corporate guarantee, within 30 days after close of the firm's fiscal year. This Permit condition is applicable throughout the entirety of the post-closure care period.
 - b. Revised whenever there is a change in the facility's post-closure plan increasing the cost of the post-closure plan.
 - c. Kept on record at the facility and updated. (35 IAC 724.244.
 - d. Maintained at the value approved by Illinois EPA with annual adjustment for inflation during the post-closure care period and cannot be decreased unless approved by the Illinois EPA in a permit modification.
36. **FINANCIAL ASSURANCE FOR POST-CLOSURE CARE.** The Permittee must demonstrate compliance with 35 IAC 724.245 and 703.241(a)(2) by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the cost estimates required by Standard Condition 35. This financial assurance must be maintained at such value throughout the post-closure care period and must be adjusted

accordingly pursuant to Standard Condition 35. Changes in financial assurance mechanisms must be approved by the Illinois EPA pursuant to 35 IAC 724.245.

Financial assurance documents submitted to Illinois EPA should be directed to the following address:

Illinois Environmental Protection Agency
Bureau of Land #24
Materials Management and Compliance Section
2520 West Iles Avenue
P.O. Box 19276
Springfield, IL. 62794-9276

37. **INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS.**
The Permittee must comply with 35 IAC 724.248 whenever necessary.

SECTION VII: REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA Post-Closure Permit is summarized below. This summary is provided to highlight the various reporting and notification requirements of this Permit.

CONDITION	SUBMITTAL	DUE DATE
SECTION II: POST-CLOSURE CARE		
II.C.2	Submit Class 2 modification request to extend post-closure care period.	On or prior to April 6, 2030
II.D.6	Submit annual post-closure care report.	June 1
II.E.7.e	Submit results of leachate analysis.	June 1
II. F.2	Request permit modification to remove hazardous waste, liner or contaminated soils.	Prior to removing waste, liner, or contaminated soils
II.F.4	Submit Certification of Completion of Post-Closure Form, Post-Closure Documentation Report and Documentation of Recorded EC.	Within 60 days after completion of the post-closure care period
SECTION III: GROUNDWATER DETECTION MONITORING PROGRAM		
III.C.4	Notify IEPA if any of the wells identified in Condition III.C.1 are damaged, or the structural integrity has been compromised.	Within 30 days of the date the damage is detected
III.C.6	Provide Illinois EPA boring logs, construction diagrams and data sheets from new or replacement wells.	Within 30 days of the date installation is complete
III.H.2	Reporting of groundwater monitoring data and statistical calculations are required semi-annually.	April 15 and October 15
III.H.3	Semi-annual groundwater surface elevation data.	April 15 and October 15

CONDITION	SUBMITTAL	DUE DATE
III.H.4	Groundwater flow rate and direction in the uppermost aquifer, submitted with second semi-annual groundwater report.	October 15
III.H.5	Surveyed elevation of the top of the well casing ("stick-up"), submitted with second semi-annual groundwater report.	October 15 every 5 years
III.H.6	Elevation of the bottom of each monitoring well, submitted with second semi-annual groundwater report.	October 15
III.I.1	Apply for permit modification to modify the corrective action monitoring program.	Within 90 days of determining the program no longer meets the requirements of 35 IAC 724.200.
SECTION IV: CORRECTIVE ACTION		
IV.F.1	Notify Illinois EPA in writing of any newly-identified SWMU(s) or AOC(s).	No later than 30 days after discovery.
IV.F.2	Submit a SWMU Assessment Plan to Illinois EPA.	Within 90 days after receipt of the Illinois EPA request.
IV.F.3	Implement SWMU Assessment Plan.	Within 45 days of Illinois EPA Approval of SWMU Assessment Plan.
IV.F.4	Submit a report documenting the results of the approved SWMU Assessment Plan to the Illinois EPA.	In accordance with the schedule in the approved SWMU Assessment Plan.
IV.G	Notify Illinois EPA of any release(s) from SWMU(s)	Within 30 days of discovery.
IV.H.2	Submit detailed information regarding the proposed interim measure to the Illinois EPA for approval.	Prior to implementing any interim measures beyond those specified in this permit.
IV.I.1	Submit corrective action cost estimate.	Within 90 days of the effective date of this

CONDITION	SUBMITTAL	DUE DATE
		permit and update as necessary.
IV.I.3	Submit financial assurance.	Within 60 days of the approval of the initial cost estimate and as required by the Illinois EPA.
IV.I.5	Submit annual corrective action cost estimate.	As necessary.
SECTION V: SPECIAL CONDITIONS		
V.A	Submit 39i certification and supporting documentation	With all application for a permit.
SECTION VI: STANDARD CONDITIONS		
VI.6	Complete application for new permit.	At least 180 days prior to permit expiration.
VI.11	Information requested by Illinois EPA and copies of records required to be kept by this permit.	Reasonable time.
VI.14	Notify Illinois EPA of planned physical alterations or additions.	As soon as possible.
VI.16	Notify Illinois EPA of changes that may result in permit noncompliance.	As soon as possible.
VI.17	Application for permit modification indicating permit is to be transferred.	At least 90 days prior to transfer date.
VI.20	Report to Illinois EPA any non-compliance that may endanger health or environment.	
	By telephone	Within 24 hours after discovery.
	In writing	Within five days after discovery.
VI.21	Report all other instances of noncompliance.	March 1 of each year along with Annual Report.

CONDITION	SUBMITTAL	DUE DATE
VI.34	Application for permit modification amending post-closure plan.	Within 60 days prior to the proposed change in facility design or operation, or no later than 60 days after an unexpected event has occurred.
VI.35.a	Adjust post-closure cost estimate for inflation.	Within 60 days before anniversary date, or within 30 days after close of the firm's fiscal year.
VI.35.b	Revision of post-closure cost estimate.	As needed, within 90 days of discovery of revision.
VI.36	Change in financial assurance mechanism for post-closure.	As needed
VI.37	Notify Illinois EPA of commencement of voluntary or involuntary bankruptcy proceedings	Within 10 days after commencement of proceeding.

ATTACHMENT A

INSPECTION SCHEDULE & INSPECTION FORM

STATE ID # 1770200010

ILD005172325

Post-Closure Permit Log No. B-167R2

**Table B-1
Post-Closure Inspection Schedule and Log for CAMU Landfill**

Equipment or Area	Description	Activity Description	Frequency	Date/Time / Inspector	Comments and Action Items
Leachate Collection System (LCS)	Side Slope Riser (SSR) Pump and Piping	Check for leaks.	Annually		
		Check for leaks weekly thereafter.	5 days after start-up, repair leaks within 15 days.		
		Service pumps.	Per manufacturer's O&M manual.		
		Check pressure transducer for proper operation.	Per manufacturer's O&M manual.		
		Record liquid level and leachate quantity in sump. ¹	Monthly record gallons pumped from LCS and LDS for each phase.		
		Check flow meter and pump controls for proper operation.	Per manufacturer's O&M manual.		
		Clean paddlewheel on liquid flow sensors.	As needed for trouble free operation.		
		Check alarms and alarm lights for proper operation (press down lights on control panel).	Weekly during active life, monthly after closure.		
		Check liquid levels and remove liquids above pumping level.	Weekly during active site life; monthly after closure.		
		Record liquid level and leachate quantity in sump. ¹	Monthly record gallons pumped from LCS and LDS for each phase.		
Leak Detection System (LDS)		Check liquid levels and remove liquids above pumping level	Refer to 35 IAC 724.403 for frequencies if leakage does not occur.		
		Check pressure transducers for proper operation.	Per manufacturer's O&M manual.		
		Check alarms and alarm lights for proper operation.	Weekly during active site life, monthly after closure.		

Table B-1, Post-Closure Inspection Schedule and Log for CAMU Landfill (continued)

Equipment or Area	Description	Activity Description	Frequency	Date/Time / Inspector	Comments and Action Items
Exterior of CAMU Landfill	Berm	Check for wet spots and leaks.	Semiannually		
		Check for settlement, slumping or sloughing.	Semiannually		
		Check for erosion and bare sod areas.	Semiannually and after each major rainfall event (greater than 1/2 inch).		
Run-on and Run-Off Control	Erosion Control Devices	Riprap-inspection for washout or undercutting.	Quarterly and after each major rainfall event.		
		Ditches-inspect for siltation and/or erosion.	Quarterly and after each major rainfall event.		
		Erosion bales or silt fencing-inspect for washout or undercutting.	Quarterly and after each major rainfall event.		
		Culverts-inspect for washout/siltation at inlet and outlet.	Quarterly and after each major rainfall event.		
		Inspect berms for erosion, scouring and slumping	Quarterly and after each major rainfall event.		
Sedimentation Basins		Inspect pond bottom for build-up of sediment.	Quarterly and after each major rainfall event.		
		Inspect inlet and outlet for erosion and sedimentation.	Quarterly and after each major rainfall event.		
		Inspect trash rack and rock filter.	Quarterly and after each major rainfall event.		
		Inspection for growth and overall health.	Quarterly and after each major rainfall event.		
Final Cover Surface	Vegetation	Evidence of stress.	Quarterly and after each major rainfall event.		
		Bare spots from erosion, washout or dic-offs, etc.	Quarterly and after each major rainfall event.		
		Mow final cover	Annually during periods of dry weather		

Equipment or Area	Description	Activity Description	Frequency	Date/ Time / Inspector	Comments and Action Items
Final Cover System Integrity		Erosion resulting in rills, gullies or bare soil.	Quarterly and after each major rainfall event.		
		Conduct a survey of elevation points seeking for settlement, shifting.	Every five (5) years.		
		water standing on the final cover	Quarterly and after each major rainfall event.		
		Slumping or sloughing of final cover	Quarterly and after each major rainfall event.		
Security Control Devices	Fences, Gates, Locks	Inspection for proper function.	Semiannually		
		Replace and repair as required.			
Gas Venting System	Risers	Inspect for plugging.	Semiannually		
		Inspect protective tops and seal for integrity and function.	Semiannually		
Groundwater Monitoring Wells	Protective Tops Well	Record well condition, including well depth, sitation, water depth, well pipe condition and water quality.	Semiannually		
		Check for disturbance and remark (i.e., flag and/or paint).	Annually		
Horizontal and Vertical Control	Benchmarks	Survey stick-up once every five (5) years.	Every five (5) years.		
		Report elevation of the bottom of each monitoring well (Storet 72020).	Annually – report during second quarter sampling event.		

Notes:

1. Compare to Action Leakage Rate of 2,434 gallons per day for each Phase.
2. Compare survey elevations to original grading elevations and the elevations from previous surveys.

**Table B-2
Post-Closure Maintenance Plan for CAMU Landfill**

Equipment or Area	Description	Preventive Maintenance	Corrective Maintenance Procedures	Equipment Requirements	Material Needs
Leachate Collection System (LCS)	Side Slope Riser (SSR) Pump and Piping	Service pumps in accordance with the manufacturer's requirements.	Refer to O&M manual.	Refer to O&M Manual.	Refer to O&M Manuals.
		Clean pump according to the manufacturer's recommendations.	Repair leaks immediately upon discovery.	Refer to O&M Manual.	
		Clean interior piping annually.			
		Inspect liquid level sensor.	Refer to O&M manual.	Refer to O&M Manual.	
Leachate Detection System (LDS)		Service pumps in accordance with the manufacturer's requirements.	Refer to O&M manual.	Refer to O&M Manual.	Refer to O&M Manuals.
		Clean pump according to the manufacturer's recommendations.	Repair leaks immediately upon discovery.	Refer to O&M Manual.	
		Clean interior piping annually.			
		Inspect liquid level sensor.		Refer to O&M Manual.	
Final Cover	Surface Water Management System	Clean culverts of debris.	Correct erosion problems by installing erosion control devices.	Truck, bobcat, shovel.	Erosion mat, riprap, topsoil, etc.
	Cover Settlement		Fill settled areas and grade to drain. Revegetate filled areas.	Truck, small bulldozer, Seeder, landscaping tools.	Fill soil, topsoil, seed, fertilizer and mulch.
Final Cover	Vegetation Final Surface	Mow grass semiannually.	Repair eroded areas, fill with soil to grade, install erosion mat prior to seeding.	Truck small bulldozer,	Fill soil, topsoil, seed, fertilizer, mulch and erosion matting.
		Revegetate bare spots and eroded areas.	Seed, fertilize and mulch.	Seeder and mower.	

Table B-2, Post-Closure Maintenance Plan for CAMU Landfill (continued)

Equipment or Area	Description	Preventive Maintenance	Corrective Maintenance Procedures	Equipment Requirements	Material Needs
Berms	Exterior Berms	Mow grass semiannually.	Repair eroded areas by filling with soil to grading and adding erosion mat prior to seeding.	Track, small bulldozer,	Fill soil, topsoil, seed, fertilizer, mulch and erosion matting.
		Revegetate bare spots and eroded areas.	Seed, fertilize and mulch.	Seeder, landscaping tools.	
Environmental Monitoring Devices	Groundwater Monitoring Wells	Mark wells with flag to prevent damage during other maintenance.	Repair/replace broken protector pipes, surface seals and locks.	Shovel	Protector pipes, bentonite lock/key set, PVC pipe
Security Devices	Means to Control Entry	Repaint rusted or scratched areas.	Repair or replace worn or rusty fences.	Hand tools	Fence/gate parts and locks
	Exterior Lighting	Replace burnt out bulbs.			
Surface Water Management and Erosion Control Structures	Sedimentation Pond	Clean sediment from ponds.	Repair eroded inlet/outlet, dikes, etc.	Backhoe, truck, shovel	Fill soil, erosion control materials (e.g., riprap), pipes
		Remove debris from pipes and trash rack.	Repair eroded or silted in areas.		
			Clean trash rack, inlet and outlet pipes.		
	Ditches, Culverts, Spillways, etc.	Clean sediment from ditches.	Replace rusted culverts. Repair eroded areas and install erosion control measures.	Backhoe, truck, shovels	Fill soil erosion control materials (e.g., riprap), pipes
Access Roads		Remove tracked mud.	Repair ruts, pot holes, etc.	Truck, shovels	Road gravel
Gas Vents	Gas Vents	Clean vents.	Repair, replace damaged vents and surface seals.	Shovel	Piping, glue, etc.

¹To be compared with the action leakage rate of 2,434 gal/day per phase.

Table B-3
Post-Closure Repair Log for CAMU Landfill

Item	
Description of Planned Repair	
Date of Inspection/Discovery	
Name of Inspector	
Person Responsible for Repair	
Description of Completed Repair	
Date of Repair Initiation	
Date of Repair Completion	
Additional Comments and Follow up Actions	

ATTACHMENT B

CONSTRUCTION CERTIFICATION FORM

STATE ID # 1770200010

ILD005172325

Post-Closure Permit Log No. B-167R2

ATTACHMENT B

When submitting certifications required by this RCRA Post-Closure Permit for construction of any new unit, please complete the attached certification form. This will help to ensure that the submittal reaches its proper destination, and the certification will meet the regulatory requirements. Sending the Field Operations Section (FOS) copy directly to the FOS Office is acceptable as long as all copies have a completed copy of the enclosed form, and the Permit Section, is advised in writing, that a copy has been sent to the FOS Office.

A documentation report and as-built drawings (sealed and signed by a qualified Illinois licensed professional engineer) must be included with this certification. Information necessary to document the construction of the unit and to support the certification must be contained within the report. This report should include a thorough description of all construction data and drawings and should be formatted in a logical and orderly manner. The construction documentation report must contain at least the following items:

1. An introduction and summary which describes the scope and purpose of the project;
2. A description of all construction activities, including quality assurance and quality control;
3. As-built drawings of the unit and a description of any deviations from the plans and specifications approved in the Permit;
4. A description of the test methods used and justification for any deviations from standard test methods;
5. A summary of test results, identification of any samples which did not meet the specifications, and the corrective action and retesting which was undertaken in response to any failing test results;
6. Any necessary information associated with construction of the unit to document that construction was in accordance with the plans and specifications approved by the Permit;
7. Information specifically required by the Permit; and
8. Any available photographs of the unit.

CONSTRUCTION CERTIFICATION

This statement is to be completed by both the responsible officer and the qualified Illinois licensed professional engineer upon completion of construction in accordance with 35 IAC 702.126. Submit one copy of the certification with original signatures and two additional copies. Forward these certification statements and any information required by the Permit to the following address:

Illinois Environmental Protection Agency
Bureau of Land -- #33
Permit Section
2520 West Iles Avenue
P.O. Box 19276
Springfield, Illinois 62794-9276

FACILITY NAME: Modern Plating Corp.
IEPA SITE CODE: LPC No. 1770200010
USEPA ID NO.: ILD005172325
PERMIT LOG NO. B-167R2
PERMIT (OR MODIFICATION) ISSUANCE DATE:
PERMIT CONDITION NO. REQUIRING CERTIFICATION:

The _____ has been constructed in accordance with the specifications in the post-closure permit application. Documentation that the construction was in accordance with the Permit is contained in the enclosed report. 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 assure 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.

Signature of Owner/Operator

Name and Title

Signature of Registered P.E.

Name of Registered P.E. and
Illinois Registration Number
(P.E. Seal)

DATE

ATTACHMENT C

APPROVED PERMIT APPLICATION IDENTIFICATION

STATE ID # 1770200010

ILD005172325

Post-Closure Permit Log No. B-167R2

ATTACHMENT C

IDENTIFICATION OF APPROVED PERMIT APPLICATION

This Permit is based on the information in the approved permit application. The approved permit application consists of the following documents:

<u>Document</u>	<u>Date</u>	<u>Date Received</u>
RCRA Post-Closure Permit Renewal Application	1/8/2021	1/8/2021
Revised Submission of RCRA Post-Closure Permit Renewal Application	5/7/2021	5/11/2021
Additional Information	5/30/2025	6/5/2025
Additional Information	7/29/2025	7/31/2025

ATTACHMENT D

CHRONOLOGICAL SUMMARY OF RCRA CORRECTIVE ACTION ACTIVITIES

STATE ID # 1770200010

ILD005172325

Post-Closure Permit Log No. B-167R2

ATTACHMENT D**CHRONOLOGICAL SUMMARY OF RCRA CORRECTIVE ACTION ACTIVITIES**

The table below summarizes the corrective action activities completed to date at Modern Plating Corp. (Illinois EPA ID No. 1770200010, USEPA ID No. ILD005172325) under its RCRA Permit (Log B167, B167R, and associated modifications). This summary is based on a chronological presentation of the various letters sent by Illinois EPA.

Date of IEPA Letter and Log No.	Brief Description of Action
December 6, 1999 (Log No. C-259-M-8)	RCRA Part B application for proposed CAMU proposal for excavation of wetland Soils During the winter of 1999-2000 and contingency for CAMU volume.
December 22, 1999 (Log No. B-167)	Final RCRA closure plan and basis of design review letter – work plan for investigation of old outfall and sanitary sewer lines.
December 22, 1999 (No Log No. B-167)	Modern Plating Corp. CAMU contingency plan for volume increase.
January 6, 2000 (No Log No.)	Additional well data received.
January 13, 2000 (No Log No.)	Modern Plating Corp. CAMU contingency plan for volume increase, landfill stability analysis for volume increase is adequate.
January 17, 2000 (No Log No.)	RCRA closure modification request, IEPA approved the construction of a temporary storage unit.
January 31, 2000 (Log No. C-1597-99)	Responses to comments on the section 401 water quality certification application for the Modern Plating Corp. removal of hazardous materials from wetlands.
March 10, 2000 (No Log No.)	Additional comments on the draft RCRA part B Permit application for Modern Plating Corp.
March 23, 2000 (No Log No.)	Document release forms – required forms provided.
April 5, 2000 (Log No. B-167)	Request to revise the Modern Plating Corp RCRA part B Permit application RCRA log #B-167 and comments on the draft RCRA part B Permit – single RCRA part B permit placed on file.
April 6, 2000 (No Log No.)	Modern Plating Waste Water Treatment Plant application for Permit for construction approval – approval granted to begin in May, 2000.

Date of IEPA Letter and Log No.	Brief Description of Action
April 17, 2000 (No Log No.)	Monitoring well installation documentation, MW-23B and MW-23C IEPA accept documentation of wells constructed along GMZ.
May 5, 2000 (No Log No.)	Report on the phase I investigation of the abandoned outfall pipeline at the Modern Plating Corp property - response received on 6/8/2000. Response from the IEPA indicates that the Phase II work plan has been accepted.
May 17, 2000 (No Log No.)	Request for revised RCRA part B Permit for the Modern Plating Corp - request for revising the permit were accepted following the conditions set forth in the response.
July 7, 2000 (Log No. C-259-M-9)	Phase II investigation of the abandoned outfall pipeline at the Modern Plating Corp property, 1770200010-Stephenson County, Log No. C-259-M-9, RCRA closure - Response from the IEPA indicates that the Phase II work plan has been accepted.
August 18, 2000 (No Log No.)	Response to IEPA request for information concerning disposal in the CAMU landfill of remediation waste from a recent release at the Modern Plating Corp - response from the IEPA states that the recent release area will need to be classified as a SWMU.
November 1, 2000 (No Log No.)	Construction certification for Modern Plating Corp - response from the IEPA states Phase 2 was constructed in accordance with the approved plans.
December 6, 2000 (No Log No.)	Status of construction of the Modern Plating Corp CAMU landfill.
July 5, 2001 (No Log No.)	Construction certification for Modern Plating Corp., CAMU landfill phases 1 and 2 - certification received under review by IEPA.
August 3, 2001 (No Log No.)	Closure documentation report for Modern Plating Corp. - closure certification forms received and IEPA is reviewing closure documentation.
October 29, 2002 (No Log No.)	RCRA Class 1* Permit modification request for the Modern Plating Corp - clarification and permit modification received and being review by IEPA.
October 29, 2002 (No Log No.)	Clarifications for the Modern Plating Corp July, 2001 CAMU landfill construction documentation report, and August, 2001 closure documentation report - clarification received and being reviewed by IEPA.
December 6, 2002 (No Log No.)	Clarifications for the Modern Plating Corp closure documentation report (August 2001) - clarification received and being reviewed by IEPA.

Date of IEPA Letter and Log No.	Brief Description of Action
December 13, 2002 (No Log No.)	Clarifications for the Modern Plating Corp closure documentation report dated August, 2001 - clarification received and being reviewed by IEPA.
September 8, 2003 (No Log No.)	RCRA Class 1* Permit modification for the Modern Plating Corp - modification requested, under review.
December 30, 2003 (No Log No.)	Revised post-closure inspection and maintenance schedule - modification requested, under review.
December 31, 2008 (No Log No.)	RCRA Class 1* Permit modification request for the Modern Plating Corp - permit modification for post-closure permit received on May 7, 2009.
June 2, 2009 (No Log No.)	Groundwater Management Zone re-evaluation RCRA Post-Closure Permit IEPA#1770200010 Modern Plating Corporation, Freeport, Illinois.
March 1, 2010 (No Log No.)	Notice of Deficiency response - renewal Application for RCRA Part B Post-Closure Permit.
March 30, 2010 (No Log No.)	RCRA Part B Post-Closure Permit renewal application, response to Notice of Deficiency dated January 12, 2010, 1st completeness review - IEPA granted a RCRA post-closure permit renewal for CAMU 6/9/11.
March 30, 2010 (Log No. 167R)	Modern Plating Corporation, Freeport IL IEPA #1770200010, Log No. 167R RCRA Part B Post-Closure Permit Renewal Application Response to Notice of Deficiency Dated January 12, 2010, 1st Completeness Review - IEPA granted a RCRA post-closure permit renewal for CAMU in letter dated 6/9/11.
March 30, 2010 (No Log No.)	Draft Environmental Land Use Control - IEPA approved a draft ELUC in a letter dated 5/3/10 to modify the RCRA corrective action program and requested conditions and modifications.
June 10, 2010 (No Log No.)	Environmental Land Use Control - IEPA approved a ELUC in a letter dated 7/22/10 to modify the RCRA corrective action program with restrictions listed.
October 4, 2011 (No Log No.)	Class 1* Modification request - analysis of Impacts to MW-20C at Modern Plating Corporation, Freeport, Illinois.
September 12, 2019 (Log No. 167R-CA-1)	Resubmittal of Corrective Action certification form LPC 632 Groundwater Management Zone re-evaluation Log No. B167RCA1 RCRA Post-Closure Permit IEPA#1770200010 Modern Plating Corporation, Freeport, Illinois - IEPA responded to letters sent on 6/23/2020 and 8/28/2020 in a letter dated 10/16/2020 accepting the revised GMZ re-evaluation.

Date of IEPA Letter and Log No.	Brief Description of Action
May 31, 2019 (No Log No.)	Groundwater Management Zone re-evaluation RCRA Post-Closure Permit IEPA#1770200010 Modern Plating Corporation, Freeport, Illinois – IEPA responded to letters sent on 6/23/2020 and 8/28/2020 in a letter dated 10/16/2020 accepting the revised GMZ re-evaluation.
April 3, 2020 (Log No. B-167R-CA-1)	Request for extension Groundwater Management Zone re-evaluation and related requirements Log No. B-167R-CA-1 RCRA Post-Closure Permit IEPA#1770200010 Modern Plating Corporation, Freeport, Illinois – IEPA accepted request for extension in a letter from Kenneth Smith dated 5/5/2020
June /23/2020 (Log No. B167RCA1)	Revised Groundwater Management Zone re-evaluation Log No. B167RCA1 RCRA Post-Closure Permit IEPA#1770200010 Modern Plating Corporation, Freeport, Illinois - IEPA responded to letters sent on 6/23/2020 and 8/28/2020 in a letter dated 10/16/2020 accepting the revised GMZ re-evaluation.
8/28/2020 (Log No. B-167R-CA-3)	Addendum to revised Groundwater Management Zone re-evaluation Log No. B-167R-CA-3 RCRA Post-Closure Permit IEPA#1770200010 Modern Plating Corporation, Freeport, Illinois - IEPA responded to letters sent on 6/23/2020 and 8/28/2020 in a letter dated 10/16/2020 accepting the revised GMZ re-evaluation.

ATTACHMENT E

FACILITY MAPS

STATE ID # 1770200010

ILD005172325

Post-Closure Permit Log No. B-167R2

ATTACHMENT F

CERTIFICATION OF COMPLETION OF POST-CLOSURE CARE

STATE ID # 1770200010

ILD005172325

Post-Closure Permit Log No. B-167R2

CERTIFICATION OF COMPLETION OF POST-CLOSURE CARE

Modern Plating Corp. (1770200010) – Stephenson County

USEPA ID: ILD005172325

RCRA Permit Log No. B-167R2

To meet the requirements of 35 Ill Administrative Code (IAC) 724.220, this statement is to be completed by both a responsible officer of the owner/operator (as defined in 35 IAC 702.126) and by a qualified Illinois licensed professional engineer upon completion of post-closure care of the UNIT NAME. Submit one copy of the certification with original signatures and two additional copies.

The hazardous waste management unit closed as a landfill, known as the Corrective Action Management Unit (CAMU), has been closed in accordance with the specifications in the approved closure plan. Post-Closure care required for the CAMU has been provided and completed in accordance with the RCRA Permit. A report documenting that required post-closure care have been carried out and completed in accordance with the approved post-closure care plan is attached.

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 assure 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.

A person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS5/44(h))

Facility Name

Printed Name of Responsible Officer

Signature of Owner/Operator **Date**
Responsible Officer

Printed Title of Responsible Officer

Signature of Licensed P.E. **Date**

Printed Name of Licensed P.E. and Illinois License Number

Mailing Address of P.E.:

Licensed P.E.'s Seal:

ATTACHMENT G

CORRECTIVE MEASURES PROGRAM REQUIREMENTS

STATE ID # 1770200010

ILD005172325

Post-Closure Permit Log No. B-167R2

ATTACHMENT G

CORRECTIVE MEASURES PROGRAM REQUIREMENTS

1.0 INTRODUCTION/PURPOSE

RCRA Corrective Action projects typically consist of two phases: (1) A RCRA Facility Investigation (RFI) where an investigation is conducted at the solid waste management units (SWMU's) of concern at a facility; and (2) implementation of corrective measures needed to properly address any contaminant encountered during the RFI. This document has been developed to outline the procedures to be carried out to implement a corrective measure program.

1.0 BRIEF OVERVIEW OF A RCRA CORRECTIVE MEASURES PROGRAM

Typically, at the end of an RFI, the concentration of contaminants present in the soil/sediments/groundwater/surface waters at a SWMU or other area of concern (AOC) is compared to remediation objectives developed in accordance with Title 35 Illinois Administrative Code (IAC) Part 742. If the contaminant levels are above these objectives, then some type of corrective measure must be completed to achieve these objectives. In addition, certain corrective measures may need to be carried out to support the established remediation objectives (i.e., the establishment of engineered barriers and/or institutional controls). However, at a unit where waste or high levels of contamination remains, a decision may be made to close the unit as a landfill and then provide post-closure rather than removing the material and/or achieving remediation objectives developed in accordance with 35 IAC Part 742.

To allow for a logical and orderly progression in developing and implementing necessary corrective measures, the Corrective Measures Program (CMP) being carried out in accordance with this RCRA Permit should be carried out in five phases which build on each other. It is not necessary for a CMP at a given SWMU or other AOCs to follow these five phases step-by-step; rather, phases can be combined and/or skipped, depending on the actual remedial measure selected. The overall CMP implemented must set forth a logical path for its implementation and allow for Illinois EPA oversight and approval throughout the entire process.

A brief discussion of the five phases of a CMP is as follows:

1. Phase I is the conceptual design of the selected corrective measure(s).
2. Phase II is the development of final design plans for the corrective measure, including installation and operation/maintenance plans.

3. Phase III is the actual construction/installation of the selected corrective measure.
4. Phase IV is the operation, maintenance, and monitoring of the selected corrective measure to ensure it is properly protecting human health and the environment.
5. Phase V is the final demonstration/verification that the implemented corrective measure achieved the approved remedial objectives.

Sections 3.0 through 7.0 which follow provide a more detailed discussion of each of these five phases. Section 8.0 has been developed to describe the CMP which may be used in lieu of the afore-mentioned five phase procedure when soil removal is the selected remedy. It must be noted that work plans, reports, etc. must be developed to document how the Permittee carries out the required CMP at each SWMU or other AOCs. All such documents must be reviewed and approved by Illinois EPA prior to their implementation.

2.0 PHASE I OF THE CMP

Phase I of the CMP includes selection of the corrective measure to be taken and developing a basis for completing the final design of the measure. This effort should be documented in a Conceptual Design Report which describes the proposed corrective measure for each SWMU and other AOC and provides a conceptual design for these measures. The main criteria for the Illinois EPA review is whether the proposed corrective measures are able to achieve the final cleanup objectives previously established by the Permittee and the Illinois EPA and/or provide the necessary institutional controls to prevent the migration of contaminants from the SWMU of concern. Based upon a review of the Conceptual Design Report, the Illinois EPA may approve the corrective measures, require revisions to the proposed corrective measures, or require that a totally new corrective measures proposal be submitted to the Illinois EPA.

The Conceptual Design Report should contain the following sections:

1. Introduction/Purpose. This section should contain: (1) general background information regarding the project; (2) the purpose and goals of the submittal; and (3) the scope of the project.
2. Existing Site Conditions. This section should contain a summary of the investigative activities conducted for each of the units of concern. Investigation analytical results should be provided in tabular form, and maps depicting both the horizontal and vertical extent of contamination at the site should be provided.

3. **Evaluation for Potential Future Migration.** Based on the existing site conditions, a conceptual model of the site should be developed and presented in this section. The potential for additional future migration of contamination for each of the units of concern must then be evaluated, especially those units which have been determined to have released hazardous waste/hazardous constituents to the groundwater. It may be helpful to develop conceptual models for contaminant migration. Of special concern in this evaluation are: (1) the physical properties of the contaminants (solubility, volatility, mobility, etc.); and (2) existing site conditions (types of soil present, location of contamination, hydrology, geology, etc.).
4. **Corrective Measures Objectives.** This section should discuss the general objectives of the proposed corrective measure to be constructed/installed, and the ability of the proposed corrective measure to achieve the established remediation objectives (unless the selected corrective measure is closure as a landfill which will require proper establishment of a final cover and proper post-closure care of the closed unit).
5. **Identification of Options Available.** This section should contain a brief discussion of the various options available to achieve the corrective measures objectives for each unit. This discussion should identify: (1) a general overview of each option available, including how the option will achieve the stated objective; (2) the advantages associated with each option; (3) the disadvantages associated with each option and (4) an estimate of the cost associated with choosing each remedial option.
6. **Description of Selected Corrective Measure.** This section should contain a qualitative discussion of the corrective measure chosen, along with the rationale which was used to select this measure from all those identified initially. This discussion should include documentation that the selected corrective measure will be effective.
7. **Identification of Design Criteria.** This section should identify what information must be available to design the selected corrective measure.
8. **Review of Available Information.** This section should contain an evaluation of the existing information to ensure that it is sufficient to complete the design of the selected corrective measure. If insufficient information is available, then the report should contain procedures for collecting the required additional information.

9. Procedures for Completing the Design. This section should contain a description of the procedures which will be followed to complete the design of the corrective measure. This should include as appropriate:
- a. Identification of the references and established guidance which will be used in designing the selected corrective measure. Justification for the selection of this procedure should also be provided.
 - b. A description of the procedures which will be used to complete the design of the corrective measure.
 - c. Identification of assumptions to be used in the design, and the impact these assumptions have on the overall corrective measure;
 - d. Significant data to be used in the design effort;
 - e. Identification and discussion of the major equations to be used in the design effort (including a reference to the source of the equations);
 - f. Sample calculations to be used in the design effort;
 - g. Conceptual process/schematic diagrams;
 - h. A site plan showing a preliminary layout of the selected corrective measure;
 - i. Tables giving preliminary mass balances;
 - j. Site safety and security provisions.

This information will form the technical basis for the detailed design of the remedial measure and the preparation of construction plans/specifications.

10. Identification of Required Permits. This section should identify and describe any necessary Permits associated with the selected corrective measure, as well as the procedures which will be used to obtain these Permits.
11. Long lead Procurement Considerations. This section should identify any elements/components of the selected corrective measure which will require a large amount of time to obtain/install. The following issues should also be discussed: (1) the reason why it will take a large amount of time to obtain/install

the item; (2) the length of time necessary for procurement and (3) recognized sources of such items.

12. **Project Management.** This section should contain information regarding the procedures and personnel which will be involved in completing the design of the selected corrective measure. A schedule for completing the design should also be provided.

3.0 PHASE II OF THE CMP

Once the Illinois EPA approves the Conceptual Design Report, the facility should complete the design of the approved corrective action (Phase II of the CMP). Upon final completion of the design, a Final Design Report, consisting of final plans, specifications, construction work plan, etc., must be submitted to the Illinois EPA for review and approval.

Several documents must be submitted to the Illinois EPA as part of Phase II of the CMP. The following text describes the expected contents of the various documents which should be developed and submitted to the Illinois EPA as part of Phase II of the CMP.

1. **Final Design Report and Construction Work Plan.** The Final Design Report and Construction Work Plan must contain the detailed plans, specifications and drawings needed to construct the corrective measure. In addition, this document must contain:
 - (1) calculations, data etc., in support of the final design; and (2) a detailed description of the overall management strategy, construction quality assurance procedures and schedule for constructing the corrective measure. It must be noted that the approved Conceptual Design Report forms the basis for this final report. The information which should be provided in this document includes:
 - a. **Introduction/Purpose.** This portion of the document should: (1) provide background information regarding the project, (2) describe the purpose and goals of the project, and (3) describe the scope of the project.
 - b. **Detailed Plans of the Design System, including the following:**
 - 1) **Plan views;**
 - 2) **Section and supplementary views which, together with the specifications and general layouts, facilitate construction of the designed system;**
 - 3) **Dimensions and relative elevations of structures;**
 - 4) **Location and outline form of the equipment;**

- 5) Ground elevations; and
 - 6) Descriptive notations, as necessary, for clarity.
- c. Technical Specifications. Complete technical specifications for the construction of the system, including, but are not limited to, the following:
- 1) All construction information, not shown in the drawings, which is necessary to inform the contractor in detail as to the required quality of materials, workmanship, and fabrication of the project;
 - 2) The type, size, strength, and operating characteristics of the equipment;
 - 3) The complete requirements for all mechanical and electrical equipment, including machinery, valves, piping and jointing of pipe;
 - 4) Electrical apparatus, wiring and meters;
 - 5) Construction materials;
 - 6) Chemicals, when used;
 - 7) Miscellaneous appurtenances;
 - 8) Instruction for testing materials and equipment as necessary; and
 - 9) Availability of soil boring information.
- d. Project Management. A description of the construction management approach, including the levels of authority and responsibility, lines of communication and qualifications of key personnel who will direct corrective measures construction/installation must be provided in the work plan.
- e. Construction Quality Assurance/Quality Control. A construction quality assurance/quality control plan describing the procedures which will be followed to ensure the corrective measure is constructed/installed in accordance with the approved plans and specifications.
- f. Schedule. The work plan must contain a schedule for completion of all major activities associated with construction/installation of the selected corrective measures. All major points of the construction/installation should be highlighted.

- g. **Waste Management Practices.** This portion of the document should identify the wastes anticipated to be generated during the construction/installation of the corrective measures and provide a description of the procedures for appropriate characterization and management of these wastes.
 - h. **Required Permits.** Copies of permit applications submitted to other Bureaus of the Illinois EPA for the selected corrective measure must be provided in the report. If it is determined that no Permit is required for construction/installation and implementation of the corrective measures, rationale and justification must be provided to support this contention.
 - i. **Cleanup Verification.** The report must contain the procedures which will be followed that the approved remediation objectives have been achieved when operation of the system is completed.
2. **Operation and Maintenance Plan.** An Operation and Maintenance Plan must be developed and submitted as part of Phase II of the CMP. This plan should outline the procedures for performing operations, long term maintenance, and monitoring of the corrective measure.
- a. **Introduction and Purpose.** This portion of the document should provide a brief description of the facility operations, scope of the corrective measures project, and summary of the project objectives.
 - b. **System Description.** This portion of the document should provide a description of the corrective measure and significant equipment, including manufacturer's specifications. This portion of the Permit should also include a narrative of how the selected system equipment is capable of complying with the final engineered design of the corrective measure.
 - c. **Operation and Maintenance Procedures.** This portion of the document should provide a description of the normal operation and maintenance procedures for the corrective measures system, including:
 - 1) Description of tasks for operation;
 - 2) Description of tasks for maintenance;
 - 3) Description of prescribed treatment or operation conditions; and
 - 4) Schedule showing the frequency of each operation and maintenance task.

- d. **Inspection Schedule.** This portion of the document should provide a description of the procedures for inspection of the corrective measures system, including problems to look for during the inspection procedure, specific inspection items, and frequency of the inspections.
- e. **Waste Management Practices.** This portion of the document should provide a description of the wastes generated by the corrective measure, and the appropriate procedures for proper characterization/management of these wastes.
- f. **Contingency Procedures.** This portion of the document should provide a description of the procedures which will address the following items:
 - 1) System breakdowns and operational problems including a list of redundant and emergency backup equipment and procedures;
 - 2) Alternative procedures (i.e., stabilization) which are to be implemented in the event that the corrective measure fails. The alternative procedures must be able to prevent release or threatened releases of hazardous wastes/hazardous constituents which may endanger human health and the environment or exceed cleanup standards.
 - 3) Notification of facility and regulatory personnel in the event of a breakdown in the corrective measures, including written notification identifying what occurred, what response action is being taken and any potential impacts on human health and the environment.

4.0 PHASE III OF THE CMP

Once the final design report is approved by the Illinois EPA, construction/installation of the approved corrective measure must commence. During this period, quarterly reports should be submitted which contain the following information:

- 1. Summary of activities completed during the reporting period;
- 2. An estimate of the percentage of the work completed;
- 3. Summaries of all actual or proposed changes to the approved plans and specifications or its implementation;
- 4. Summaries of all actual or potential problems encountered during the reporting period;

5. Proposal for correcting any problems; and
6. Projected work for the next reporting period.

Upon completion of construction/installation of the approved corrective measure, a Construction Completion Report must be submitted to the Illinois EPA documenting that these efforts were carried out in accordance with the Illinois EPA approved plans and specifications. This report should contain a thorough description of the efforts that went into constructing/installing the corrective measure and demonstrate that the procedures in the Illinois EPA approved Final Design Report were followed during this effort. Such a report should be formatted in a logical and orderly manner and contain the following information:

1. An introduction discussing the background of the project and the purpose and scope of the corrective measure described in the report.
2. Identification of the plans, technical specifications and drawings which were used in constructing/installing the corrective measure. These specifications and drawings should have been approved by the Illinois EPA during Phase II.
3. Identification of any variations from the Illinois EPA approved plans, technical specifications, and drawings used in construction/installing the corrective measure. Justification regarding the need to vary from the approved plans and specifications must also be provided.
4. A description of the procedures used to construct/install the corrective measure, including the procedures used for quality assurance and quality control.
5. As built drawings, including identification of any variations from the approved plans, technical specifications, and drawings.
6. A summary of all test results from the construction/installation effort, including quality assurance/quality control testing.
7. Actual test results, including quality assurance/quality control test results. These results should be located in an attachment/appendix and be well organized.
8. Identification of any test results which did not meet the specified value and a description of the action taken in response to this failure, including retesting efforts.
9. Photographs documenting the various phases of construction.
10. A detailed discussion of how the construction/installation effort met the requirements of the approved Final Design Report.

11. A certification meeting the requirements of 35 IAC 702.126 by a qualified Illinois licensed professional engineer and by an authorized representative of the owner/operator.

5.0 PHASE IV OF THE CMP

Once the corrective measure has been constructed/installed, it must be operated, maintained, and monitored in accordance with the approved plans and specifications (this is Phase IV of the CMP). During this period, quarterly reports must be submitted to the Illinois EPA documenting the results of these efforts. These reports include the following:

1. Introduction. -- A brief description of the facility operations, scope of the corrective measures project, and summary of the project objectives.
2. System Description. -- A description of the corrective measures constructed/installed at the site and identify significant equipment. Describe the corrective measure and identify significant equipment.
3. Monitoring Results. -- A description of the monitoring and inspection procedures to be performed on the corrective measures. A summary of the monitoring results for the corrective measures, including copies of any laboratory analyses which document system effectiveness, provide a description of the monitoring procedures and inspections performed, and include a summary of the monitoring results for the corrective measure. Copies of all laboratory analytical results which document system monitoring must be provided.
4. Effectiveness Determination. -- Calculations and other relevant documentation which demonstrates the effectiveness of the selected corrective measure in remediating/stabilizing contamination to the extent anticipated by the corrective measures final design. Copies of relevant analytical data should be provided to substantiate this determination.
5. System Effectiveness Recommendation. -- Based upon the results of the effectiveness determination required under Item 4, recommendations on continued operation of the corrective measure must be provided. If the corrective measure is not performing in accordance with the final design, a recommendation on revisions or expansion of the system should be provided.

6.0 PHASE V OF THE CMP

Once all corrective measures have been completed, a report must be developed documenting all the efforts which were carried out as part of implementing the corrective measure and

demonstrating, as appropriate, that the approved remediation objectives have been achieved. This report should contain a compilation of all previous reports and contain sufficient information to demonstrate that the approved remediation objectives have been achieved. It must be noted that such a report will not be developed for a unit closed as a landfill until the post-closure care period has been completed.

7.0 PROCEDURES WHICH SHOULD BE FOLLOWED WHEN SOIL REMOVAL IS THE SELECTED CORRECTIVE MEASURE

Sections 3.0 through 6.0 above describe the procedures which should be followed when it is necessary to design a physical corrective measure (e.g., a final cover system, some type of treatment system, etc.). However, such detail is not necessary if excavation/removal is selected as the remedial action for the contaminated soil encountered at the site. In general, a work plan should be developed for this effort (for Illinois EPA review and approval) which fully describes each step to be used in removing the contaminated soil from the property. This includes a description of (1) the equipment utilized in the removal effort, (2) the pattern followed in removing the soil; (3) the depth to which the soil will be removed; (4) management of the soil on-site after it is removed from the ground; (5) loading areas; (6) the ultimate destination of the soil; and (7) any other steps critical to the removal effort.

One way to conduct a soil removal effort is to collect and analyze a sufficient number of soil samples to clearly determine the horizontal and vertical extent of soil contamination prior to conducting the soil removal effort. The boundaries of soil which must be removed are defined by the Illinois EPA established cleanup objectives for the project. Soil excavation must extend to sample locations where soil test results indicate that the remediation objectives are met. Closure verification sampling is not necessary in such cases, if a qualified Illinois licensed professional engineer oversees the soil removal effort and certifies that the remediation limits extend to these boundaries.

Another way to conduct a soil removal effort is to collect and analyze a limited number of soil samples prior to the soil removal effort and to rely mainly on field observation to determine the extent of the soil removal. In such cases closure verification sampling is necessary. Soil samples must be collected for analysis from the bottom and sidewalls of the final excavation. The following sampling/analysis effort is necessary to demonstrate that the remaining soil meets the established cleanup objectives:

1. A grid system should be established over the excavation.
2. Samples should be collected from the floor of the excavation at each grid intersection, including intersections along the perimeter of the excavation.

3. Samples should be collected at six inches to 12 inches below the ground surface (bgs) along the excavation sidewalls at each grid intersection around the excavation perimeter. Samples must also be collected at the midpoint of the excavation wall at each grid intersection along the excavation perimeter.
4. Collection/analysis of all required samples must be in accordance with the procedures set forth in the approved plan.
5. Soil samples which must be analyzed for volatile organic compounds (VOCs) must be collected in accordance with the procedures set forth in Method 5035 of SW-846. In addition, such samples must be collected six inches to 12 inches beneath the floor/sidewalls of the excavation to minimize the possibility of volatilization of the contaminants prior to the collection of the samples.
6. No random sampling may be conducted to verify achievement of cleanup objectives have been met.
7. Additional soil must be removed, as necessary, until it can be demonstrated that the remaining soil in and around the AOC meets the established cleanup objectives. Additional samples must be collected and analyzed in accordance with the procedures described above from areas where additional soil has been removed.

ATTACHMENT H

LEACHATE ANALYTICAL PARAMETERS

STATE ID # 1770200010

ILD005172325

Post-Closure Permit Log No. B-167R2

ATTACHMENT H

TABLE 1

Sample Parameters

Parameter	Cas No.	ICP/MS	Reporting Units
Boron	7440-42-8	EPA-6020A	mg/L
Cadmium	7440-43-9	EPA-6020A	mg/L
Chromium	7440-47-3	EPA-6020A	mg/L
Cobalt	7440-48-4	EPA-6020A	mg/L
Copper	7440-50-8	EPA-6020A	mg/L
Iron	7439-89-6	EPA-6020A	mg/L
Lead	7439-92-1	EPA-6020A	mg/L
Manganese	7439-96-5	EPA-6020A	mg/L
Magnesium	7439-95-4	EPA-6020A	mg/L
Mercury	7439-97-6	EPA-6020A	mg/L
Nickel	7440-02-0	EPA-6020A	mg/L
Potassium	7440-09-7	EPA-6020A	mg/L
Silver	7440-22-4	EPA-6020A	mg/L
Sodium	7646-69-7	EPA-6020A	mg/L
Thallium	7440-28-0	EPA-6020A	mg/L
Zinc	7440-66-6	EPA-6020A	mg/L
Total Metals	--	EPA-6020A	mg/L
VOC Scan	--	EPA-8260	ug/L
PAHs	--	EPA-8270	ug/L
Chloride	--	325.2/325.3	mg/L
Fluoride	--	340.1/340.2	mg/L
Nitrate	--	353.2/353.4	mg/L
Sulfate	--	375.4/375.2	mg/L
Cyanide	57-12-5	SM4500CN C/SW9012A	mg/L
BOD	--	SM5210B	mg/L
TSS	--	SM2540D	mg/L
pH	--	150.1/150.2	S.U.
Alkalinity	--	EPA-310.2	

*Some parameters may be combined in a sample bottle determined by the analytical lab

EXHIBIT F

