

EXHIBIT B.4



WASTE MANAGEMENT
29755 S Prairie View Drive
Wilmington, IL 60481
815 423 5120
815 423 5920 Fax

November 13, 2017

Ted Dragovich, P.E.
Permit Section, Bureau of Land
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, IL 62702

RE: 0310390001 -- Cook County
CID Recycling and Disposal Facility
ILD010284248
RCRA Log No. B-27R
Class 1* Permit Modification Application

Dear Mr. Dragovich:

The CID Recycling and Disposal Facility (CID RDF), in accordance with 35 IAC 703.281, hereby submits this Class 1* Permit Modification application to update the post-closure care cost estimates in Section I of the RCRA Part B Application. The post-closure care cost estimates have been reviewed and/or adjusted for inflation pursuant to permit condition V.34.a of the RCRA Part B permit, and reduced by one year. Also, the cost estimates in permit condition IV.F.1 for conducting corrective action has been updated to reflect the corrective action program approved in Log No. B-27R-CA-7. Copies of the edited Table I-4, Table I-5 and Table I-6 and their corresponding revised versions are included as Attachments 1 and 2, respectively, of this submittal. Applicable information required by Sections 703.181 through 703.185, 703.201 through 703.207, 703.221 through 703.225, and 703.230 can be found in the facility's approved permit applications and the permit log identified above.

Changes to the RCRA Part B Permit Application

Upon approval of this permit modification, please replace the old Table I-4, Table I-5 and Table I-6 with the revised tables included in Attachment 2.

Changes to the RCRA Part B Permit

Upon approval of this modification request, please update permit conditions I.G.1, I.G.2 and IV.F.1 with the updated cost estimate totals.

In accordance with 35 IAC 703.281(a)(2), CID will provide a written notification of this permit modification to all persons on the facility's mailing list within 90 days of approval by the Agency.

If there are any questions on this information or if any additional information is needed, please contact me at 773-437-2011.

Sincerely,

Waste Management


Bernadette G. Sarmiento, P.E.
Site Engineer

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. (35 IAC 102-126(d))



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): 0310390001 USEPA ID Number: ILD010284248
Site Name: CID Recycling and Disposal Facility
Physical Site Location (street, road, etc.): 138th and Interstate 94
City: Calumet City Zip Code: 60409 County: Cook
Existing RCRA Permit (if applicable): Log No. B-155-CA-10

II. Owner/Operator Identification

Owner Information

Name: Waste Management of Illinois, Inc.
Mailing Address: CID Recycling and Disposal Facility
PO Box 1309, 138th and Interstate 94
Calumet City, IL 60409
Contact Name: Bernadette Sarmiento
Phone #: 773-437-2011

Operator Information

Name: Waste Management of Illinois, Inc.
Mailing Address: CID Recycling and Disposal Facility
PO Box 1309, 138th and Interstate 94
Calumet City, IL 60409
Contact Name: Bernadette Sarmiento
Phone #: 773-437-2011

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

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.)

Updated post-closure care and corrective action cost estimates

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): Brian S. Roth

Owner Signature: Brian S Roth

Date: 11/9/17

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): Brian S. Roth

Operator Signature: Brian S Roth

Date: 11/9/17

Title: Vice President

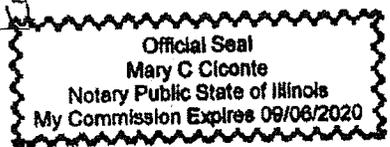
NOTARY: (Required for both owner and operator signatures)

Subscribe and sworn before me this 14 day of January, 2020

Notary Signature: [Signature]

Notary Seal:

My commission expires on: 09/06/2020



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): SEE OTHER FORM

Engineer Signature: _____

Illinois License No.: _____

Expiration Date of License: _____

Engineer Seal:

Engineer Phone No. _____

Engineer Address:

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))

Instructions for

RCRA Permit Application Form LPC-PA23

The following instructions are designed to aid in the completion of the RCRA Permit Application Form LPCPA23. 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.



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Please type or print all information legibly.

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Site Name: CID Recycling and Disposal Facility
Physical Site Location (street, road, etc.): 138th and Interstate 94
City: Calumet City Zip Code: 60409 County: Cook
Existing RCRA Permit (if applicable): ILD010284248, RCRA Log B-27R

II. Owner/Operator Identification

Owner Information

Name: Waste Management of Illinois, Inc.
Mailing Address:
CID Recycling and Disposal Facility
PO Box 1309, 138th and Interstate 94
Calumet City, IL 60409
Contact Name: Bernadette Sarmiento
Phone #: 773-437-2011

Operator Information

Name: Waste Management of Illinois, Inc.
Mailing Address:
CID Recycling and Disposal Facility
PO Box 1309, 138th and Interstate 94
Calumet City, IL 60409
Contact Name: Bernadette Sarmiento
Phone #: 773-437-2011

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 Groundwater Corrective Action UIC Class I UIC Class V

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

Updated post-closure care and corrective action cost estimates.

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): SEE OTHER FORM

Owner Signature: _____ Date: _____

Title: _____

Operator

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Operator Name (Printed or Typed): SEE OTHER FORM

Operator Signature: _____ Date: _____

Title: _____

NOTARY: (Required for both owner and operator signatures)

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

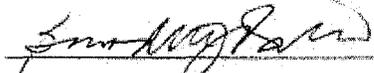
Notary Signature: _____ Notary Seal:

My commission expires on: _____

Engineer

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Engineer Name (Printed or Typed): Bernadette G. Sarmiento

Engineer Signature: 

Illinois License No.: 062-057609

Expiration Date of License: 11/30/19 Engineer Seal:

Engineer Phone No. 773-437-2011

Engineer Address:

CID Recycling and Disposal Facility
PO Box 1309, 138th and Interstate 94
Calumet City, IL 60409



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.

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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.

ATTACHMENT I

TABLE I-4
CID RDF POST-CLOSURE COST ESTIMATE
AREA 3 LANDFILL

NOTE: Area 3 landfill was certified closed on October 10, 2008. Post-closure activities for the Area 3 Landfill commenced in 2008

TASK	Units	Quantity	#/yr	# yrs	Unit Cost*	COSTS
Mow and fertilize (if required) cover area (170 acres total)	acre	170	1	2221	60.75*	227,211
Dress and re-seed 3% of cover area (PC Year 7, 12, 17, 22 and 27)	acre	3% total	1	4	1,833*	37,396
Landfill cap and surface water management system maintenance	LS	1	1	2221	1,105*	24,309
Semi-annual Inspection	each	1	2	2221	332*	14,621
Groundwater monitoring (Sampling & Analysis)						
- Dolomite wells	each	8	2	2221	522 C	183,744 C
- Sand wells	each	5	2	2221	334 C	73,480 C
- GMZ Dolomite wells	each	23	4	9	531 C	439,668 C
- GMZ Sand wells	each	9	4	9	326 C	105,624 C
- Additional wells after completion of Corrective Action	each	5	2	12	484 C	58,080 C
5-Year GMZ Re-evaluation	each	2+	0.2	2	5,000 C	2,000 +
Groundwater remediation system operation and maintenance	LS	1	1	9	11,000 C	99,000 C
Groundwater treatment	gal	1,320,000	1	9	0.056*	659,934
Groundwater Well Survey (Biennial)	each	1	0.5	2221	1,774 C	19,514 C
Groundwater Data Review, Reporting and Statistics	each	1	1	2221	6,500 9,000	143,000 C
Security and fencing maintenance (10,200 lineal feet total)	feet	2% total	1	2221	5.75*	25,792
Leachate and condensate collection and disposal (average of last 4 yrs)	gal	8,074,733	1	2221	0.056*	9,868,131
Leachate level monitoring and reporting	LS	1	1	2221	1,450*	31,900 +
Leachate monitoring (Sampling & Analysis, 35 IAC 724 Appendix 1 parameters)	LS	3	1	2221	1,005 955	66,330 C
Leachate/Gas system maintenance	LS	1	1	2221	27,613*	607,495
Gas flare system maintenance	LS	1	1	2221	8,838*	194,425
Decommissioning of landfill gas system	LS	1	1	1	66,273*	66,273
Air monitoring - monthly wellfield monitoring	LS	1	12	2221	552*	145,852
Air monitoring - annual surface scans	LS	1	1	2221	765 C	16,830 C
Air monitoring - Flare: Annual gas sampling and Visible Emission (VE) testing	LS	1	1	2221	2,100 C	46,200 C
Air monitoring - Gas Turbine: semi-annual sulfur analysis	LS	1	2	2221	1,700 1545	74,800 +
Air monitoring - Gas Turbine: semi-annual sulfur analysis and V.E. testing	LS	1	2	2221	1,500 1319	66,000 +
Post-closure certification report	LS	1	1	1	11,045*	11,045
Public Access Structures/Facilities maintenance	LS	1	1	2221	2,761*	60,749
TOTAL						13,369,403

Notes:

* adjusted by inflation factor $\frac{2016}{2008} = 1.31\%$ per IIEPA-Greg Morris, 3/9/16)

C - current cost

~~added in 2016~~

* ADJUSTED FOR INFLATION
 C CURRENT COST

TABLE I-5

CID RDF POST-CLOSURE COST ESTIMATE

AREA 4 LANDFILL

NOTE: Area 4 landfill was certified closed on April 23, 2010. Post-closure activities for the Area 4 Landfill commenced in 2010

TASK	Units	Quantity	#/yr	# yrs	Unit Cost*	COSTS
Mow and fertilize (if required) cover area (26 acres total)	acre	26	1	2023	60.75*	37,909
Dress and re-seed 3% of cover area (PC Year 7, 12, 17, 22 and 27)	acre	3% total	1	8 A	1,833*	7,149
Landfill cap and surface water management system maintenance	LS	1	1	2023	1,105*	26,519
Semi-annual Inspection	each	1	2	2023	332*	15,950
Groundwater Monitoring (Sampling & Analysis)						
- Dolomite wells	each	9	2	2023	564 ^C	243,648 ^C
- Dolton Sand wells	each	10	2	2023	375 ^C	180,000 ^C
Groundwater Well Survey (Biennial)	each	1	0.5	2023	712 ^C	8,544 ^C
Groundwater Data Review, Reporting and Statistics	each	1	1	2023	3,600 ^C	86,400 ^C
Security and fencing maintenance (7,200 lineal feet total)	feet	2% total	1	2023	5.75*	19,861
Leachate collection and disposal (average of last 4 yrs)	gal	1,424,114	1	2023	0.056*	1,898,629
Leachate level monitoring and reporting	LS	1	1	2023	2,900*	69,600 ⁺
Leachate monitoring (Sampling & Analysis, 35 IAC 724 Appendix I parameters)	LS	1	1	2023	1,010 ⁹⁵⁵	24,240 ^C
Leachate system maintenance	LS	1	1	2023	14,359*	344,620
Post-closure certification report	LS	1	1	1	13,807*	13,807
TOTAL						2,976,876

Notes:

* adjusted by inflation factor ²⁰¹⁶ 2015 = 1.3% per IEPA-Greg Morris, 3/9/16

C - current cost

X - added in 2016

* ADJUSTED FOR INFLATION
C CURRENT COST

TABLE I-6

CID RDF - CORRECTIVE ACTION COST ESTIMATE

The approved correction action program for the SWMUs of concern (Area 1 and 2 landfills) consists of the following tasks. Costs are based upon 24 years, to coincide with the Area 4 landfill post-closure period.

<u>TASK</u>	<u>Cost Per Year</u>	<u># yrs</u>	<u>COST</u>
Operation and maintenance of a landfill gas management system for each landfill			
Landfill gas monitoring system - monthly checks of the extraction wells	3,805	24	91,320
Landfill gas monitoring system - semi-annual bar hole probe monitoring and river observations	320	24	7,680
Operation and maintenance of a leachate management system for each landfill			
Leachate management system - monthly checks of the removal wells and underground storage tank systems.	26,520	24	636,480
Quarterly groundwater piezometer level measurements for leachate compliance determinations	320	24	7,680
Inspecting/maintaining the final cover of each landfill			
Landfill cover for Areas 1 and 2 - quarterly checks for settlement, erosion and vegetative stress.			
Area 1 - quarterly checks from Year 5 through Year 30	760	24	18,240
Area 2 - quarterly checks from Year 5 through Year 30	380	24	9,120
TOTAL OPERATION AND MAINTENANCE COST			770,520
Regrading/upgrading the final cover of each landfill			
Regrading and upgrading of the final cover of the Area 1 and Area 2 landfills in accordance with plans and specifications approved by Illinois EPA with conditions and modifications on May 8, 2006; March 16, 2007; July 17, 2007; August 7, 2007; November 13, 2007 and November 30, 2012.			
Area 2 clean soil and vegetative layer placement and seeding	218,600	1	218,600
TOTAL REGRADING/UPGRADING OF FINAL COVER COST			218,600
Corrective Measures as required by B-27R-CA-7, issued October 29, 2013			
Groundwater remediation system operation and maintenance	5,000	24	120,000
Groundwater remediation system quarterly inspection	2,400	24	57,600
Extracted groundwater treatment	63,600	24	1,526,400
Groundwater Management Zone permit applications	5,000	2	10,000
Phytoremediation system annual maintenance	3,000	24	72,000
Phytoremediation system annual inspection and report	1,200	24	28,800
Leachate level and volume reporting	3,600	24	86,400
TOTAL CORRECTIVE MEASURES COST			1,901,200
TOTAL			2,890,320

ATTACHMENT 2

TABLE 1-4

CID RDF POST-CLOSURE COST ESTIMATE

AREA 3 LANDFILL

NOTE: Area 3 landfill was certified closed on October 10, 2008. Post-closure activities for the Area 3 Landfill commenced in 2008

TASK	Units	Quantity	#/yr	# yrs	Unit Cost*	COSTS
Mow and fertilize (if required) cover area (170 acres total)	acre	170	1	21	61.54	219,697
Dress and re-seed 3% of cover area (PC Year 7, 12, 17, 22 and 27)	acre	3% total	1	4	1,857	37,879
Landfill cap and surface water management system maintenance	LS	1	1	21	1,119	23,507
Semi-annual Inspection	each	1	2	21	336	14,125
Groundwater monitoring (Sampling & Analysis)						
- Dolomite wells	each	8	2	21	522	175,392 C
- Sand wells	each	5	2	21	334	70,140 C
- GMZ Dolomite wells	each	23	4	9	531	439,668 C
- GMZ Sand wells	each	9	4	9	326	105,624 C
- Additional wells after completion of Corrective Action	each	5	2	12	484	58,080 C
5-Year GMZ Re-evaluation	each	2	0.2	2	5,000	4,000
Groundwater remediation system operation and maintenance	LS	1	1	9	11,000	99,000 C
Groundwater treatment	gal	1,320,000	1	9	0.057	673,929
Groundwater Well Survey (Biennial)	each	1	0.5	21	1,774	18,627 C
Groundwater Data Review, Reporting and Statistics	each	1	1	21	9,000	189,000 C
Security and fencing maintenance (10,200 lineal feet total)	feet	2% total	1	21	5.82	24,953
Leachate and condensate collection and disposal (average of last 4 yrs)	gal	8,815,026	1	21	0.057	10,501,235
Leachate level monitoring and reporting	LS	1	1	21	1,469	30,846
Leachate monitoring (Sampling & Analysis, 35 IAC 724 Appendix I parameters)	LS	3	1	21	955	60,165 C
Leachate/Gas system maintenance	LS	1	1	21	27,972	587,411
Gas flare system maintenance	LS	1	1	21	8,953	188,011
Decommissioning of landfill gas system	LS	1	1	1	67,135	67,135
Air monitoring - monthly wellfield monitoring	LS	1	12	21	559	140,912
Air monitoring - annual surface scans	LS	1	1	21	765	16,065 C
Air monitoring - Flare: Annual gas sampling and Visible Emission (VE) testing	LS	1	1	21	2,100	44,100 C
Air monitoring - Gas Turbine: semi-annual sulfur analysis	LS	1	2	21	1,545	64,890 C
Air monitoring - Gas Turbine: semi-annual sulfur analysis and V.E. testing	LS	1	2	21	1,319	55,398 C
Post-closure certification report	LS	1	1	1	11,189	11,189
Public Access Structures/Facilities maintenance	LS	1	1	21	2,797	58,735
TOTAL						13,979,712

Notes:

* adjusted by inflation factor (2016 = 1.3%)

C - current cost

TABLE I-5

CID RDF POST-CLOSURE COST ESTIMATE

AREA 4 LANDFILL

NOTE: Area 4 landfill was certified closed on April 23, 2010. Post-closure activities for the Area 4 Landfill commenced in 2010

TASK	Units	Quantity	#/yr	# yrs	Unit Cost*	COSTS
Mow and fertilize (if required) cover area (26 acres total)	acre	26	1	23	61.54	36,801
Dress and re-seed 3% of cover area (PC Year 7, 12, 17, 22 and 27)	acre	3% total	1	4	1,857	5,793
Landfill cap and surface water management system maintenance	LS	1	1	23	1,119	25,745
Semi-annual Inspection	each	1	2	23	336	15,471
Groundwater Monitoring (Sampling & Analysis)						
- Dolomite wells	each	9	2	23	564	233,496 C
- Dolton Sand wells	each	10	2	23	375	172,500 C
Groundwater Well Survey (Biennial)	each	1	0.5	23	712	8,188 C
Groundwater Data Review, Reporting and Statistics	each	1	1	23	3,600	82,800 C
Security and fencing maintenance (7,200 lineal feet total)	feet	2% total	1	23	5.82	19,292
Leachate collection and disposal (average of last 4 yrs)	gal	1,505,322	1	23	0.057	1,964,060
Leachate level monitoring and reporting	LS	1	1	23	2,938	67,567
Leachate monitoring (Sampling & Analysis, 35 IAC 724 Appendix 1 parameters)	LS	1	1	23	955	21,965 C
Leachate system maintenance	LS	1	1	23	14,546	334,550
Post-closure certification report	LS	1	1	1	13,986	13,986
TOTAL						3,002,214

Notes:

* adjusted by inflation factor (2016 = 1.3%)

C - current cost

TABLE I-6

CID RDF - CORRECTIVE ACTION COST ESTIMATE

The approved correction action program for the SWMUs of concern (Area 1 and 2 landfills) consists of the following tasks. Costs are based upon 23 years, to coincide with the Area 4 landfill post-closure period.

<u>TASK</u>	<u>Cost Per Year</u>	<u># yrs</u>	<u>COST</u>
Operation and maintenance of a landfill gas management system for each landfill			
Landfill gas monitoring system - monthly checks of the extraction wells	3,805	23	87,515
Landfill gas monitoring system - semi-annual bar hole probe monitoring and river observations	320	23	7,360
Operation and maintenance of a leachate management system for each landfill			
Leachate management system - monthly checks of the removal wells and underground storage tank systems.	26,520	23	609,960
Quarterly groundwater piezometer level measurements for leachate compliance determinations	320	23	7,360
Inspecting/maintaining the final cover of each landfill			
Landfill cover for Areas 1 and 2 – quarterly checks for settlement, erosion and vegetative stress.			
Area 1 – quarterly checks from Year 5 through Year 30	760	23	17,480
Area 2 – quarterly checks from Year 5 through Year 30	380	23	8,740
TOTAL OPERATION AND MAINTENANCE COST			738,415
Regrading/upgrading the final cover of each landfill			
Regrading and upgrading of the final cover of the Area 1 and Area 2 landfills in accordance with plans and specifications approved by Illinois EPA with conditions and modifications on May 8, 2006; March 16, 2007; July 17, 2007; August 7, 2007; November 13, 2007 and November 30, 2012.			
Area 2 clean soil and vegetative layer placement and seeding	218,600	1	218,600
TOTAL REGRADING/UPGRADING OF FINAL COVER COST			218,600
Corrective Measures as required by B-27R-CA-7, issued October 29, 2013			
Groundwater remediation system operation and maintenance	5,000	23	115,000
Groundwater remediation system quarterly inspection	2,400	23	55,200
Extracted groundwater treatment	63,600	23	1,462,800
Groundwater Management Zone permit applications	5,000	2	10,000
Phytoremediation system annual maintenance	3,000	23	69,000
Phytoremediation system annual inspection and report	1,200	23	27,600
Leachate level and volume reporting	3,600	23	82,800
TOTAL CORRECTIVE MEASURES COST			1,822,400
TOTAL			2,779,415



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

BRUCE RAUNER, GOVERNOR

ALEC MESSINA, DIRECTOR

217/524-3300

December 28, 2017

CERTIFIED MAIL

7014 2120 0002 3286 4516

Brian S. Roth
Waste Management of Illinois, Inc.
720 E. Butterfield Road
4th Floor
Lombard, IL. 60148

RE: 0310390001 – Cook County
CID Recycling and Disposal Facility
ILD010284248
Log No. B-27R-M-84
RCRA Permit
Permit Approval

Dear Mr. Roth:

This letter is in response to the document described below that was submitted by Bernadette Sarmiento of Waste Management, Inc., as a Class 1* permit modification request for the above referenced RCRA permitted facility.

Submittal – A document entitled, “Class 1* Permit Modification Application”, dated November 13, 2017 and received by the Illinois EPA on November 15, 2017. The subject document was submitted to fulfill the requirements of Condition V.34.a of the facility’s Hazardous Waste Management RCRA Post-Closure Permit (Permit) and to update the corrective action cost estimate to reflect the approved corrective action program (B-27R-CA-7).

The Illinois EPA has reviewed the information contained in Ms. Sarmiento’s submittal and has determined that the updated post closure and corrective action cost estimates can be approved. The information in your submittal has been incorporated into the approved permit application for the above-referenced facility.

This determination was based on the review of: (1) the RCRA Post Closure Permit (Permit) issued to CID RDF; (2) the regulations [35 Ill. Adm. Code Subtitle G]; and (3) the information contained in Ms. Sarmiento’s submittal.

A revised RCRA Permit is attached to this letter; Condition I.G.1, I.G.2, IV.F.1 and Attachment E have been revised as a result of this approved modification. Operations at the above-referenced facility must be in accordance with the RCRA Permit issued to the CID facility and all subsequent approved modifications to the Permit.

4302 N. Main St., Rockford, IL 61103 (815)987-7760
595 S. State, Elgin, IL 60123 (847)608-3131
2125 S. First St., Champaign, IL 61820 (217)278-5800
2009 Mail St., Collinsville, IL 62234 (618)346-5120

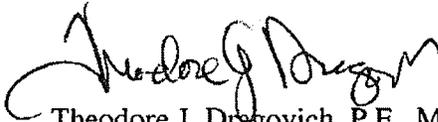
9511 Morrison St., Des Plaines, IL 60016 (847)294-4000
412 SW Washington St., Suite D, Peoria, IL 61602 (309)671-3022
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200
100 W. Randolph, Suite 4-500, Chicago, IL 60601

Pursuant to 35 Ill. Adm. Code 703.281(a)(2), a notice of this modification shall be sent to all persons on the facility mailing list, maintained by the Illinois EPA in accordance with 35 Ill. Adm. Code 705.163(a)(4), and the appropriate units of state and local government as specified in 35 Ill. Adm. Code 705.163(a)(5). For a Class I* modification the notice must be made within 90 calendar days after the Illinois EPA approves the request.

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

If you have any questions regarding financial assurance, please contact Travis Grupe at 217/524-2891. If you have any questions regarding groundwater issues, please contact Joshua Rhoades at 217/524-0080. For all other questions, please contact Kelly Huser at 217/524-3867.

Sincerely,



Theodore J. Dragovich, P.E., Manager
Permit Section
Division of Land Pollution Control
Bureau of Land

TJD: KDH:0310390001-RCRA-B27RM84-Approval.docx

KDH JRM JHC JDM

Attachment: Revised RCRA Post Closure Permit

cc: Gary Victorine, U.S. EPA – Region V
Lisa Grassl, Waste Management
Bernadette Sarmiento, Waste Management



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

BRUCE RAUNER, GOVERNOR

ALEC MESSINA, DIRECTOR

HAZARDOUS WASTE MANAGEMENT RCRA POST CLOSURE PERMIT

0310390001 -- Cook County
CID Recycling and Disposal Facility
ILD 010284248
Log No. B-27R-M-84
RCRA Permit

Issue Date: June 11, 2008
Effective Date: July 16, 2008
Expiration Date: July 16, 2018
Modification Date: December 28, 2017

Owner and Operator
Waste Management of Illinois, Inc.
P.O. Box 1309
138th and Interstate 94
Calumet City, Illinois 60409

A modified RCRA Post Closure permit is hereby issued to Waste Management of Illinois, Inc. as owner to provide post closure care for two closed hazardous waste landfills (Area 3 and 4) at the above-referenced facility. This permit is issued pursuant to Section 39(d) of the Illinois Environmental Protection Act and Title 35 Illinois Administrative Code Subtitle G (35 Ill. Adm. Code).

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. This permit consists of the conditions contained herein (including those in any attachments).

This permit is issued based on the information submitted in the permit application, and any subsequent amendments as identified in Attachment E of this permit (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.

Sincerely,

Theodore J. Dragovich, P.E., Manager
Permit Section
Division of Land Pollution Control
Bureau of Land

TJD: KDH:0310390001-RCRA-B27RM84-Approval.docx

KDH JKM JEM

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100 W. Randolph, Suite 4-500, Chicago, IL 60601

MODIFIED RCRA POST-CLOSURE PERMIT

CID FACILITY

CALUMET CITY, ILLINOIS

ILD010284248

LOG NO. B-27R-M-84

MODIFIED RCRA POST-CLOSURE PERMIT
LOG NO. B-27R-M-84

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LIST OF ATTACHMENTS

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GENERAL FACILITY DESCRIPTION
CID Facility
Calumet City, Illinois
ILD010284248

I. General

The CID facility owned by Waste Management of Illinois, Inc., and operated by Waste Management of Illinois, Inc. was a commercial facility involved in the disposal of hazardous waste. Nearly all of the hazardous waste handled at this facility was generated off-site by various industries. In particular, the largest generators of wastes accepted at the facility were the metal finishing industry, the iron and steel industry, and the petroleum refining industry. Only a small portion of the waste disposed at the facility was actually generated on-site.

A 25.9 acre closed hazardous waste landfill (known as Area 4) exists at the facility. The Illinois EPA approved closure of the Area 4 landfill on April 23, 2010 (Log No. B-27R-M-13).

A 173-acre closed landfill (known as Area 3) also exists at the facility. Approximately 83 acres of this landfill received hazardous waste during operation between 1980 and January, 1983, when hazardous waste was co-disposed with municipal waste disposed at Area 3. Since January, 1983, Area 3 has only received municipal refuse and other non-hazardous special wastes. However, as this landfill did receive hazardous waste, was closed in accordance with the closure plan approved by the Illinois EPA on June 6, 1986 (including any adjudicated revisions as a result of the appeal), and receive post-closure care and monitoring in accordance with this RCRA Post Closure permit. The Illinois EPA approved closure of the Area 3 landfill in a letter dated October 10, 2008 (Log No. C-187-CERT).

II. Site Description

This facility is located in portions of the incorporated limits of Burnham, Calumet City and Chicago, in Cook County, Illinois. The address of the facility is 138th and Interstate 94, Calumet City, Illinois 60409. A portion of the USGS Topographic Map, Lake Calumet Quadrangle is included as Figure B-1 of the Approved Permit Application to show the exact location of this facility. A drawing showing the overall layout of the CID facility is provided as Attachment I to this permit.

SECTION I: POST-CLOSURE**A. SUMMARY**

Hazardous waste management units where waste is left in-place must receive post-closure care for at least 30 years after they are closed. As Area 3 was used for the disposal of hazardous waste prior to January 26, 1983, and Area 4 was used for the disposal of hazardous waste, post-closure care must be provided for both units. Activities required during post-closure care include, but are not limited to, (1) maintenance of the final cover, (2) management of leachate, and (3) monitoring of the groundwater. Post-closure care for Area 3 shall begin on May 30, 2008. Post-closure care for Area 4 shall begin on February 18, 2010.

B. UNIT IDENTIFICATION

1. The Permittee shall provide post-closure care for the Area 3 and Area 4 hazardous waste landfills, subject to the terms and conditions of this permit.
2. Area 3 was closed in accordance with the closure plan in the approved permit application (App. 37). The Illinois EPA approved closure of Area 3 in a letter dated October 10, 2008 (Log No. C-187-CERT). The final elevations for Area 3 landfill are in accordance with the approved closure plan contained in the permit application (Fig. 17A, App. 37).

As closure of the area where hazardous wastes were disposed in Area 3 includes the entire 173-acre parcel of land, the Illinois EPA considers all of Area 3 to be a hazardous waste management unit. Therefore, post-closure care meeting the requirements of 35 Ill. Adm. Code 724.217 through 724.220 must be provided for the entire 173-acre landfill known as Area 3.

3. Illinois EPA approved the general concepts set forth in the End Use Plan submitted December 29, 2010 and July 14, 2011 (B-27R-M-25) for the Area 3 landfill at this facility. However, any technical issues pertaining to post-closure care of this landfill in this plan are superseded by: (a) all conditions in this permit, except this one; and (b) the portions of the approved permit application other than the End Use Plan.

C. MONITORING, MAINTENANCE, AND RECORDKEEPING

1. The Permittee shall conduct post-closure care for each hazardous waste management unit listed in Section B above to begin after completion of closure of the unit and continue for a minimum of 30 years after that date.

2. Prior to the time that post-closure care is due to expire, the Board will extend or the Illinois EPA may propose extension of the post-closure care period if it finds that the extended period is necessary to protect human health and the environment (e.g., leachate or groundwater monitoring results indicate a potential for migration of waste at levels which may be harmful to human health and the environment).
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. The Illinois EPA shall 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 shall not allow any use of the units designated in Section B which 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 human health or the environment.
5. The Permittee shall implement the approved Post-Closure Plan contained in the Approved Permit Application. All post-closure care activities must be conducted in accordance with the provisions of the approved Post-Closure Plan.
6. The Permittee must request a permit modification to authorize a change in the approved Post-Closure Plan. This request must be in accordance with applicable requirements of Parts 702, 703 and 724 and must include a copy of the amended Post-Closure Plan for approval by the Illinois EPA's Bureau of Land.
7. The Illinois EPA will require continuation of the security procedures set forth in the approved permit application during part or all of the post-closure period. At a minimum, Area 3 and Area 4 shall be totally fenced and shall have locked gates at each entrance. Any additional requirements beyond this shall be subject to the permit modification procedures set forth in 35 Ill. Adm. Code 705.128.
8. The Permittee shall maintain and monitor the groundwater monitoring system and comply with the other applicable regulations of 35 Ill. Adm. Code 724 Subpart F (Groundwater Protection) during the post-closure period for both Area 3 and Area 4 landfills.
9. The Permittee shall 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.

10. The Permittee shall prevent run-on and run-off from eroding or otherwise damaging the final cover.
11. 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 problems, including but not limited to the following, occur:
 - ponding
 - cracks greater than one inch wide
 - gas problems
 - odor problems
 - dead or stressed vegetation (areas greater than 50 square feet)
 - vegetation with taproots growing in areas not designed to accommodate such
 - vector problems
 - leachate popouts or seeps
 - erosion to public access ways
 - b. Continue to operate the leachate collection and removal system until leachate is no longer detected. Sufficient quantities of leachate shall be removed from the leachate collection systems in Area 3 and Area 4 to ensure that the following requirements are met:
 - i. The leachate level in Area 3 shall not exceed the following compliance elevations as measured in the sumps of the following collection systems: 555 ft. MSL for the base collection system, 566 ft. MSL for the elevated base collection system, and 580 ft. MSL for the piezometer system. Maintenance of the leachate level at or below this elevation is necessary to create and maintain an inward gradient in the soil layer surrounding the landfill. The leachate levels with the total volume of leachate extracted shall be submitted to the Illinois EPA annually by January 15th, for the previous calendar year.
 - ii. The leachate level in Area 4 shall not exceed a depth of one (1) foot above the liner. The maintenance level shall be defined as one (1) foot above the as-built base grade for each sump. Leachate levels observed in each sump and the amount of leachate removed from each sump shall be submitted to the Illinois EPA annually by January 15th, for the previous calendar year.
 - iii. Three representative samples of leachate from Area 3 and one from Area 4 shall be collected annually and analyzed individually for constituents listed

in 35 Ill. Adm. Code Part 724, Appendix I. These samples shall be collected during the first quarter inspections. The four samples will be taken from the withdrawal points listed in Condition I.C.11.b.vi. The results of these analyses shall be submitted electronically to the Illinois EPA by June 1 of each year.

- iv. The annual Appendix I analysis required by Condition I.C.11.b.iii for a given sampling point may be reduced through submittal of a permit modification request, in accordance with 35 Ill. Adm. Code 703.280, to reduce the annual leachate monitoring list. The Reduced List will be based on a review of the four most recent full Appendix I analyses, and include all parameters detected in any of these four Appendix I analysis, along with their appropriate Storet numbers for electronic data submittal. Starting the next sampling event after Illinois EPA approval, this reduced list will be used in lieu of the Appendix I analysis for three out of four years, with the fourth year reverting to a full Appendix I analysis. Any parameters not included on the existing Reduced List detected in the fourth-year Appendix I analysis shall be added to the Reduced list, by means of a permit modification request in accordance with 35 Ill. Adm. Code 703.280, for all future Reduced List analyses. This cycle of three years of Reduced List, followed by one year of Appendix I analysis, shall repeat for the remainder of the post-closure period.
- v. Information required by Condition I.C.11.b.iii and I.C.11.b.iv must be submitted in an electronic format. The information is to be submitted as fixed-width text files formatted as found in Attachment A. 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>
- vi. The following leachate withdrawal points will be used in leachate analysis required by conditions I.C.11.b.iii and I.C.11.b.iv. For purposes of electronic reporting, the points will be renamed as shown below.

<u>Name in Application</u>	<u>Name for Electronic Reporting</u>
A3LC (Area 3 Composite)	L311
A3M3 (Area 3 MH 3)	L312
A3M6 (Area 3 MH 6)	L313
A4LC (Area 4 Composite)	L331

- vii. The Permittee shall submit a completed "RCRA Facility Groundwater, Leachate and Gas Reporting form (LPC 592, a copy is provided in

Attachment A) as a cover sheet for all leachate reports for identification purposes. The form is not to be used for permit modification requests.

- c. Prevent run-on and run-off from eroding or otherwise damaging the final cover.
 - d. Maintain and monitor the groundwater monitoring system and comply with all other applicable requirements of 35 Ill. Adm. Code Part 724 Subpart F.
 - e. Protect and maintain surveyed benchmarks used in complying with surveying and recordkeeping requirements.
12. The Permittee shall monitor the Phase VI leak detection sump to determine if the quantity of leachate collected in the leak detection system exceeds the action leakage rate for Phase VI. The action leakage rate for Phase VI is 1532 gallons per day. The pump operating level for the Phase VI leak detection sump is 551 feet MSL. The Permittee shall inspect and monitor the leak detection system in accordance with the requirements in 35 Ill. Adm. Code 724.403(c).
13. In accordance with 35 Ill. Adm. Code 724.404(b), if the flow rate in the Phase VI leak detection sump exceeds the action leakage rate described above, the Permittee shall:
- a. Notify the Illinois EPA in writing of the exceedence within 7 days of the determination;
 - b. Submit a preliminary written assessment to the Illinois EPA within 14 days of the determination, as to the amount of liquids, likely sources of liquids, possible location, size and cause of any leaks, and short-term actions taken and planned;
 - c. Determine to the extent practicable the location, size and cause of any leak;
 - d. Determine any other short-term and longer-term actions to be taken to mitigate or stop any leaks; and
 - e. Within 30 days after the notification that the action leakage rate has been exceeded, submit to the Illinois EPA the results of the determinations specified above, the results of actions taken, and actions planned. Monthly thereafter, as long as the flow rate in the leak detection system exceeds the action leakage rate, the Permittee shall submit to the Illinois EPA a report summarizing the results of any remedial actions taken and action planned.

The Permittee shall follow the procedures listed in 35 Ill. Adm. Code 724.404(c) to make the determinations required above.

D. INSPECTIONS

1. The Permittee shall inspect the components, structures, and equipment at the site in accordance with the inspection schedule in Attachment D, subject to the following modification:
 - a. The Area 3 and Area 4 landfills shall be inspected to determine if corrective action for the final cover or any other structure at each landfill is needed. Inspection of the landfills and any corrective action taken shall be in accordance with the post-closure care plan in the approved permit application. If corrective action is taken, the site shall be re-visited one month later to ensure that the actions taken have indeed corrected the problem(s) noted.

E. NOTICES AND CERTIFICATION

1. After final closure has been certified, the person or office specified in the approved Post-Closure Plan must keep the plan during the remainder of the post-closure period.
2. A survey plat indicating the location and dimensions of the Area 4 landfill 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 Area 4 landfill in accordance with the applicable Subpart G regulations. These notes state:
 - a. The waste materials contained in the Area 4 landfill are considered RCRA hazardous wastes. They include asbestos-containing waste, industrial hazardous waste and commercial hazardous waste.
 - b. Any material removed from the Area 4 landfill during future activities must be managed as a hazardous waste in accordance with 35 Ill. Adm. Code Subtitle G: Waste Disposal.
 - c. The use of this area is restricted.
3. The Plat of Survey for the Area 4 landfill, Drawing No. S09-01-413 was filed with the Cook County Recorder's Office in Chicago, IL on March 18, 2010. The record data is Document No. 1007703015.

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 Area 4 landfill 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 Area 4 landfill was filed with the IEPA and the County Recorder.
4. If the Permittee or any subsequent owner or operator of the land upon which a hazardous waste disposal unit is located wishes to remove hazardous wastes, hazardous waste residues, the liner, if any, or contaminated soils, then he must request a modification to this post-closure permit in accordance with the applicable requirements in 35 Ill. Adm. Code 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 Ill. Adm. Code 724.217(c).
 5. No later than sixty (60) days after completion of the established post-closure care period for each hazardous waste disposal unit, the Permittee shall submit to the Illinois EPA, by registered mail, a certification that the post-closure care for the hazardous waste disposal unit was performed in accordance with the specifications in the approved Post-Closure Plan. The certification must be signed by the owner or 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.
 6. Illinois EPA has approved the proposed changes to the Area 4 landfill runoff control system contained in the documents titled "Class 3 Permit Modification Application Runoff Modifications", and dated August 9, 2011, March 22, 2012, and February 13, 2014 (B-27R-M-33). Illinois EPA has approved CID's October 1, 2015 document entitled "Class I* Permit Modification Construction Certification Report", which contained a construction documentation report and as-built drawings for the Area 4 runoff control system changes (B-27R-M-72).

F. SUBSURFACE GAS MANAGEMENT

1. The Permittee shall recover or flare the subsurface gas generated at Area 3 during the post-closure care period.
 - a. Condensate from any gas recovery system is considered hazardous and must be managed as hazardous waste.

2. A corrective action plan shall be submitted to the Illinois EPA's Bureau of Land for approval if subsurface gas problems start to occur.

G. POST-CLOSURE COST

1. The post-closure cost for Area 4 landfill is \$3,002,214 (2017 dollars).
2. The post-closure cost for Area 3 landfill is \$13,979,712 (2017 dollars).