

EXHIBIT B.5



WASTE MANAGEMENT

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

November 14, 2018

Theodore 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

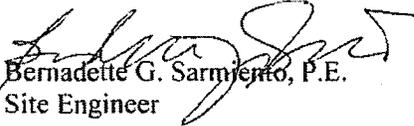
Upon approval of this modification request, please update permit conditions I.G.1, I.G.2 and IV.F.1 with the updated cost estimate totals.

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 USC 702.126(d))



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): 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): RCRA Log B-27R

II. Owner/Operator Identification

Owner Information

Name: Waste Management of Illinois, Inc.

Mailing Address:

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

Contact Name: Bernadette Sarmiento

Phone #: 815-280-6302

Email: bsarmien@wm.com

Operator Information

Name: Same as Owner

Mailing Address:

Contact Name: _____

Phone #: _____

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

- | | | |
|--|--|---|
| <input type="checkbox"/> New Part B Permit | <input type="checkbox"/> Class 1 Modification | <input type="checkbox"/> Remedial Action Plan Permit (RAPP) |
| <input type="checkbox"/> Part B Permit Renewal | <input checked="" type="checkbox"/> Class 1* (prior approval required) Modification | <input type="checkbox"/> Sig RAPP Modification |
| | <input type="checkbox"/> Class 2 Modification | <input type="checkbox"/> Non Sig RAPP Modification |
| | <input type="checkbox"/> Class 3 Modification | <input type="checkbox"/> Major UIC Modification |
| | <input type="checkbox"/> Additional information to supplement UIC Class I application Log Number | <input type="checkbox"/> Minor UIC Modification |

This Application Involves

- | | | | |
|--------------------------------------|--|--|---------------------------------------|
| <input type="checkbox"/> Storage | <input type="checkbox"/> Treatment | <input checked="" type="checkbox"/> Disposal | <input type="checkbox"/> Incineration |
| <input type="checkbox"/> Groundwater | <input type="checkbox"/> Corrective Action | <input type="checkbox"/> UIC Class I | <input type="checkbox"/> UIC Class V |

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

Updates 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:  Date: 11/13/18

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

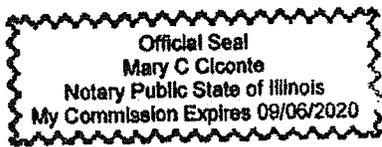
Operator Signature: Brian S Roth Date: 11/13/18

Title: Vice President

Notary (Required for both owner and operator signatures)

Subscribed and Sworn before me this 13th day of November 2018.

Notary Signature: [Signature]



My commission expires on: 09/06/2020

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): SEE OTHER FORM

Engineer Signature: _____

Illinois License No.: _____

Expiration Date of License: _____

Engineer Phone No. _____

Email: _____

Engineer Address:
[Empty Box]

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))

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 # (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): RCRA Log B-27R

II. Owner/Operator Identification

Owner Information

Name: Waste Management of Illinois, Inc.

Mailing Address:

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

Contact Name: Bernadette Sarmiento

Phone #: 815-280-6302

Email: bsarmien@wm.com

Operator Information

Name: Same as Owner

Mailing Address:

Contact Name: _____

Phone #: _____

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

- | | | |
|--|--|---|
| <input type="checkbox"/> New Part B Permit | <input checked="" type="checkbox"/> Class 1 Modification | <input type="checkbox"/> Remedial Action Plan Permit (RAPP) |
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| | <input type="checkbox"/> Class 3 Modification | <input type="checkbox"/> Major UIC Modification |
| | <input type="checkbox"/> Additional information to supplement UIC Class I application Log Number | <input type="checkbox"/> Minor UIC Modification |

This Application Involves

- | | | | |
|--------------------------------------|--|--|---------------------------------------|
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| <input type="checkbox"/> Groundwater | <input type="checkbox"/> Corrective Action | <input type="checkbox"/> UIC Class I | <input type="checkbox"/> UIC Class V |

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

Updated post-closure care and correction 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): SEE OTHER FORM

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): SEE OTHER FORM

Operator Signature: _____ Date: _____

Title: _____

Notary (Required for both owner and operator signatures)

Subscribed and Sworn before me this _____ day of _____ 20 ____ .

Notary Signature: _____

My commission expires on: _____

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): Bernadette G. Sarmiento

Engineer Signature: *Bernadette G. Sarmiento*

Illinois License No.: 062-057609

Expiration Date of License: 11/30/17

Engineer Phone No. 815-280-6302

Email: bsarmien@wm.com

Engineer Address:

Waste Management
29755 S. Prairie View Drive
Wilmington, IL 60481



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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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

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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: CID Recycling and Disposal Facility IEPA BOL No.: 0310390001

Site Address: 138th and Interstate 94, PO Box 1309

City: Calumet City State: IL Zip Code: 60409

Permit Numbers (if applicable): RCRA Log B-27R 1974-39-DE/OP

Owner Operator

Owner Name: Waste Management of Illinois, Inc.

Operator Name: Waste Management of Illinois, Inc.

Street Address: 700 Butterfield Road, 4th Floor

Street Address: 700 Butterfield Road, 4th Floor

City: Lombard State: IL Zip: 60148

City: Lombard State: IL Zip: 60148

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

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
Kurt Nebel	District Manager
Jean Laplanche	Operations Manager

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.

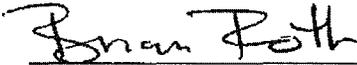
The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon 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.

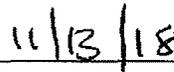
Certification Statements

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



Date

Brian Roth

Printed Name

Vice President

Title

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.

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	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 I 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

ATTACHMENT 2

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	20	62.59	212,793
Dress and re-seed 3% of cover area (PC Year 7, 12, 17, 22 and 27)	acre	3% total	1	4	1,907	38,900
Landfill cap and surface water management system maintenance	LS	1	1	20	1,138	22,760
Semi-annual inspection	each	1	2	20	342	13,668
Groundwater monitoring (Sampling & Analysis)						
- Routine Sampling (13 wells)	each	1	2	20	2,460	98,400 C
- Routine Analyses (13 wells)	each	1	2	20	3,506	140,240 C
- GMZ Sampling (36 wells)	each	1	4	9	6,015	216,540 C
- GMZ Analyses (36 wells)	each	1	4	9	9,252	333,072 C
- Additional wells after completion of Corrective Action (TBD, not in Permit)	each					0 C
5-Year GMZ Re-evaluation	each	1	1	3	13,950	41,850 C
Groundwater remediation system operation and maintenance	LS	1	1	9	11,000	99,000 C
Groundwater treatment	gal	1,320,000	1	9	0.058	688,672
Groundwater Well Survey (Biennial)	each	1	0.5	20	1,082	10,820 C
Groundwater Data Review, Reporting and Statistics	each	1	1	20	9,000	180,000 C
Security and fencing maintenance (10,200 lineal feet total)	feet	2% total	1	20	5.92	24,149
Leachate and condensate collection and disposal (average of last 4 yrs)	gal	9,304,836	1	20	0.058	10,787,841 A
Leachate level monitoring and reporting	LS	1	1	20	1,494	29,879
Leachate Sampling & Analysis (35 IAC 724 Appendix I parameters)	LS	1	1	20	2,973	59,460 C
Leachate/Gas system maintenance	LS	1	1	20	28,448	568,950
Gas flare system maintenance	LS	1	1	20	9,105	182,104
Decommissioning of landfill gas system	LS	1	1	1	68,276	68,276
Air monitoring - monthly wellfield monitoring	LS	1	12	20	569	136,441
Air monitoring - annual surface scans	LS	1	1	20	765	15,300 C
Air monitoring - Flare: Annual gas sampling and Visible Emission (VE) testing	LS	1	1	20	2,105	42,100 C
Air monitoring - Gas Turbine: semi-annual sulfur analysis	LS	1	2	20	932	37,280 C
Air monitoring - Gas Turbine: semi-annual sulfur analysis and V.E. testing	LS	1	2	20	1,527	61,080 C
Post-closure certification report	LS	1	1	1	11,379	11,379
Public Access Structures/Facilities maintenance	LS	1	1	20	2,845	56,891
TOTAL						14,177,847

Notes:

* adjusted by inflation factor (2017 = 1.7%)

C - current cost

A - average (2014 = 9,822,874; 2015 = 8,923,136; 2016 = 9,337,738; 2017 = 9,135,595)

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	22	62.59	35,799
Dress and re-seed 3% of cover area (PC Year 7, 12, 17, 22 and 27)	acre	3% total	1	4	1,889	5,892
Landfill cap and surface water management system maintenance	LS	1	1	22	1,138	25,037
Semi-annual inspection	each	1	2	22	342	15,035
Groundwater Monitoring (9 Dolomite wells and 10 Sand wells)						
- Sampling	each	1	2	22	4,025	177,100 C
- Analyses	each	1	2	22	5,242	230,648 C
Groundwater Well Survey (Biennial)	each	1	0.5	22	838	9,218 C
Groundwater Data Review, Reporting and Statistics	each	1	1	22	3,600	79,200 C
Security and fencing maintenance (7,200 lineal feet total)	feet	2% total	1	22	5.92	18,751
Leachate collection and disposal (average of last 4 yrs)	gal	1,386,931	1	22	0.058	1,768,778 A
Leachate level monitoring and reporting	LS	1	1	22	2,988	65,735
Leachate Sampling & Analysis (35 IAC 724 Appendix 1 parameters)	LS	1	1	22	1,063	23,386 C
Leachate system maintenance	LS	1	1	22	14,793	325,452
Post-closure certification report	LS	1	1	1	14,224	14,224
TOTAL						2,794,256

Notes:

* adjusted by inflation factor (2017 = 1.7%)

C - current cost

A - average (2014 = 1,559,325; 2015 = 1,233,596; 2016 = 1,477,865; 2017 = 1,276,936)

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	22	83,710
Landfill gas monitoring system - semi-annual bar hole probe monitoring and river observations	336	22	7,392
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	22	583,440
Quarterly groundwater piezometer level measurements for leachate compliance determinations	336	22	7,392
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	22	16,720
Area 2 – quarterly checks from Year 5 through Year 30	380	22	8,360
TOTAL OPERATION AND MAINTENANCE COST			707,014
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 (remaining as of 10-23-18)	135,300	1	135,300
TOTAL REGRADING/UPGRADING OF FINAL COVER COST			135,300
Corrective Measures as required by B-27R-CA-7, issued October 29, 2013			
Groundwater remediation system operation and maintenance	5,000	22	110,000
Groundwater remediation system quarterly inspection	7,000	22	154,000
Extracted groundwater treatment	63,600	22	1,399,200
Groundwater Management Zone permit applications	7,000	4	28,000
Phytoremediation system annual maintenance	3,000	22	66,000
Phytoremediation system annual inspection and report	1,200	22	26,400
Leachate level and volume reporting	2,000	22	44,000
TOTAL CORRECTIVE MEASURES COST			1,827,600
TOTAL			2,669,914

Shipment Receipt

Transaction Date: 14 Nov 2018

Tracking Number:

1Z61E52V0394496598

1 ADDRESS INFORMATION

Ship To:

IEPA-Bureau of Land, Permit
Section
Ted Dragovich, P.E.
1021 North Grand Avenue East
SPRINGFIELD IL 627024059
Telephone:9999999999

Ship From:

Prairie View Landfill
JULIE PARAMO
29755 S. Prairie View Dr
Wilmington IL 60481
Telephone:815 4235120
email:jparamo@wm.com

Return Address:

Prairie View Landfill
JULIE PARAMO
29755 S. Prairie View Dr
Wilmington IL 60481
Telephone:815 4235120 email:jparamo@wm.com

2 PACKAGE INFORMATION

	WEIGHT	DIMENSIONS / PACKAGING	DECLARED VALUE	REFERENCE NUMBERS
1.	1.0 lbs (1.0 lbs billable)	Other Packaging		Enter Name - ILMV BU - 2030

3 UPS SHIPPING SERVICE AND SHIPPING OPTIONS

Service:

UPS Ground Service

Guaranteed By:

End of Day Thursday, Nov 15, 2018

Shipping Fees Subtotal:

9.01 USD

Additional Shipping Options

Transportation

8.36 USD

Quantum View Notify E-mail Notifications:

No Charge

Fuel Surcharge

0.65 USD

1 bsarmien@wm.com: Ship

4 PAYMENT INFORMATION

Bill Shipping Charges to:

Shipper's Account 61E52V

Shipping Charges:

9.01 USD

A discount has been applied to the Daily rates for this shipment
Negotiated Charges:

6.54 USD

Subtotal Shipping Charges:

6.54 USD

Total Charges:

6.54 USD

Note: This document is not an invoice. Your final invoice may vary from the displayed reference rates.

* For delivery and guarantee information, see the UPS Service Guide ({}). To speak to a customer service representative, call 1-800-PICK-UPS for domestic services and 1-800-782-7892 for international services.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

JB PRITZKER, GOVERNOR

JOHN J. KIM, ACTING DIRECTOR

217/524-3300

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

7017 2680 0001 0207 3721

February 5, 2019

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-89
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 of Illinois, Inc. (CID), as a Class 1* permit modification request for the above referenced RCRA permitted facility. The facility's RCRA permit requires Waste Management to provide post-closure care, including groundwater monitoring/remediation at the closed Area 3 and Area 4 hazardous waste landfills and also required Waste Management to properly address the closed Area 1 and Area 2 landfills as solid waste management units of concern at the facility.

Submittal – A document entitled, "Class 1* Permit Modification Application", dated November 14, 2018 and received by the Illinois EPA on November 16, 2018. The subject submittal requested Illinois EPA approval of the updated post-closure care and corrective action program cost estimates for the above referenced RCRA permitted facility.

The Illinois EPA has reviewed the information contained in Ms. Sarmiento's submittals and has determined the subject submittals can be approved. This determination was based on the review of: (1) the RCRA Post Closure Permit (Permit) issued to CID; (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. Attachment 1 to this letter entitled "Summary of Revisions to the Permit", describes the revisions made to CID's RCRA Permit in response to the afore-mentioned modification request. Post closure care and corrective action activities 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.

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.

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

9511 Harrison St., Des Plaines, IL 60016 (847) 294-4000
412 SW Washington St., Suite D, Peoria, IL 61602 (309) 671-3302
2309 W. Main St., Suite 116, Marion, IL 62959 (618) 993-7200
100 W. Randolph St., Suite 4-500, Chicago, IL 60601

PLEASE PRINT ON RECYCLED PAPER

Code 705.163(a)(5). For a Class 1* 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 Bob Mathis at 217/785-7403
If you have any questions regarding groundwater issues, please contact Kyle Janusick at 217/524-3284, for all other questions, please contact Kelly Huser at 217/524-3867.

Sincerely,



Kenneth E. Smith, P.E., Manager
Permit Section
Division of Land Pollution Control
Bureau of Land

KES:KDH:0310390001-RCRA-B27RM89-Approval.docx

Attachment: Attachment 1 -- Summary of Revisions to the Permit
Modified RCRA Post Closure Permit

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

Attachment 1
Summary of Revisions to the Permit (Log No. B-27R-M-89)

1. Condition I.G.1 has been revised as follows: “The post-closure cost for Area 4 landfill is ~~\$3,002,214 (2017 dollars)~~ \$2,794,256 (2018 dollars).”
2. Condition I.G.2 has been revised as follows: “The post-closure cost for Area 3 landfill is ~~\$13,979,712 (2017 dollars)~~ \$14,177,847 (2018 dollars).”
3. Condition IV.F.1 has been revised as follows: “The cost estimate for conducting the corrective action required by this section is ~~\$2,779,415~~ \$2,669,914 (2018 dollars) as approved by the Illinois EPA in this permit modification (~~Log No. B-27R-M-84~~) (Log No. B-27R-M-89). Table I-6 of the approved permit application contains this cost estimate.”
4. Attachment E has been updated to incorporate the information associated with the permit modification request assigned Log Nos. B-27R-M-89 into the approved permit application for the modified permit being issued as part of this action as follows: “107. B-27R-M-89; Class I* permit modification dated November 14, 2018.”



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

JB PRITZKER, GOVERNOR

JOHN J. KIM, ACTING DIRECTOR

HAZARDOUS WASTE MANAGEMENT RCRA POST CLOSURE PERMIT

0310390001 -- Cook County
CID Recycling and Disposal Facility
ILD 010284248
Log No. B-27R-M-89
RCRA Permit

Issue Date: June 11, 2008
Effective Date: July 16, 2008
Expiration Date: July 16, 2018
Modification Date: February 5, 2019

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,

Kenneth E. Smith, P.E., Manager
Permit Section
Division of Land Pollution Control
Bureau of Land

KES:KDH:0310390001-RCRA-B27RM89-Approval.docx

KDH
WTR
WJ

MODIFIED RCRA POST-CLOSURE PERMIT
LOG NO. B-27R-M-89

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LIST OF ATTACHMENTS

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GENERAL FACILITY DESCRIPTION

CID Facility
Calumet City, Illinois
ILD010284248I. 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, it 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 receives 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 began on May 30, 2008. Post-closure care for Area 4 began 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:

a. 555 ft. MSL for the base collection system. This system consists of a base grade lateral piping system with the eastern half of the system containing a one-foot gravel drainage layer. Leachate levels are monitored at LW3, MH8, MH9, MH10, MH17, MH18 and W450R.

b. 566 ft. MSL for the elevated base collection system. This system collects leachate from a small area in the northeast portion of the landfill with lateral piping and a gravel drainage layer. Leachate levels are monitored at LW19 and MH20.

c. 580 ft. MSL for the piezometer system. This system consists of a series of leachate collection manholes and wells in the western portion of the landfill. Leachate levels are monitored at MH5, MH6, MH16, L430, L702, L704, G705, W434 and W435.

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. The approved Reduced Lists for calendar years 2019, 2020, and 2021 can be found in Attachment I.
- 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
A3L3 (Area 3 LW 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:
- Notify the Illinois EPA in writing of the exceedence within 7 days of the determination;
 - 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

5. The post-closure cost for Area 4 landfill is \$2,794,256 (2018 dollars).
6. The post-closure cost for Area 3 landfill is \$14,177,847 (2018 dollars).