EXHIBIT
Mayor Hall Ex 1 10-19-26
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December 12, 2025

Scott Eisenhauer
Administrator
Village of Rantoul
333 S. Tanner
Rantoul, IL 61866

Re: Rantoul RTS Application

Dear Scott Eisenhauer:

At your request, Foth Infrastructure & Environment, LLC (Foth) has completed a review of the application submitted by Civil & Environmental Consultants, Inc. on behalf of Area Disposal Service, Inc. for a solid waste transfer station (Rantoul RTS). The application was submitted to site the Rantoul RTS in the Village of Rantoul and in accordance with the Village's solid waste ordinance Chapter 28. Foth has reviewed the application for conformance with the siting ordinance Section 28-102(B). The review is detailed in the attached document.

Foth appreciates the opportunity to work with the Village. Please contact the undersigned with questions.

Sincerely,

Foth Infrastructure & Environment, LLC

Andrea S. Lorenz, PE
Lead Environmental Engineer
Licensed in IL, IA, MN, WI

Joshua C. Gabehart, PE
Senior Market Leader
Licensed in IL, IA, GA, AR, MO, IN

cc: John Hock, CEC

Attachment

Applicant's Exhibit 2
4/17/2026

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# 1. Introduction

The Village of Rantoul (Village) amended Chapter 28 of its solid waste ordinance (Ordinance 2796) in June 2025 to provide an approval process for pollution control facilities desiring to locate within the Village. Section 28-102(B) within the amended Chapter 28 set forth nine siting criteria which reiterates the nine siting criteria in the Illinois Environmental Protection Act 415 ILCS 5/39.2(a), adding minimum documentation to be submitted by any applicant.

An application was submitted by Civil & Environmental Consultants, Inc. (CEC), on behalf of Area Disposal Service, Inc. to site a solid waste transfer station at 896 W. Champaign Avenue Service Road, Rantoul. The application was received in separate reports by November 2025.

Following receipt of the application for the Rantoul Recycling and Transfer Station (Rantoul RTS), the Village retained Foth Infrastructure & Environment, LLC (Foth) to conduct a review of the application for conformance with Section 28-102(B). Section 2 describes Foth's review and includes review comments, and Section 3 includes Foth's recommendations.

# 2. Criteria Review

Each criterion is copied from both the Act 415 ILCS 5/39.2(a) and Section 28-102(b) below with Foth's review comments on the right side of the table. While Foth's review was conducted for conformance of the application to Section 28-102(B) of the Village ordinance, the Act siting criteria is included for reference.

## 2.1 Criterion 1

From the Act: *"the facility is necessary to accommodate the waste needs of the area it is intended to serve" [415 ILCS 5/39.2(a)(i)].*

| From Section 28-102(B)(1): | Foth's Comments: |
|---|---|
| The facility is necessary to accommodate the waste needs of the area that it is intended to serve. | CEC Criterion 1 Report reviewed; 100 pages |
| a. A description of the area to be served by the proposed facility and a statement of the needs of such area for such a facility; | a. within report; meets Criterion 1 |
| b. To the extent the information is reasonably available, a list of the existing pollution control facilities located within or serving or capable of serving the area proposed to be served and, with respect to each such facility, the following information shall be provided: location, size, owner and/or operator, type of pollution control facility, remaining capacity, probable life of the proposed facility, and types of wastes received; | b. within report; meets Criterion 1 |
| c. The expected types of hazardous, nonhazardous and special wastes, amounts and methods of treatment or storage of all wastes proposed for the pollution control facility, the geographic origins of these wastes, and the applicant's plan to preclude acceptance of unauthorized wastes. | c. within report; also see the CEC Criterion 2 Report; meets Criterion 1 |

## 2.2 Criterion 2

From the Act: *"the facility is so designed, located, and proposed to be operated that the public health, safety, and welfare will be protected" [415 ILCS 5/39.2(a)(ii)].*

| From Section 28-102(B)(2): | Foth's Comments: |
|---|---|
| The facility is so designed, located and proposed to be operated that the public health, safety and welfare will be protected. | CEC Criterion 2 Report reviewed; 677 pages. Includes:<br>◆ Operations Plan (pp 1-60)<br>◆ Stormwater Management Plan (pp 61-677) |
| a. A planimetric map showing the location of the site and the area within one thousand five hundred (1,500) feet of the site.<br>b. A plat or boundary survey of the site, including the legal description of the site.<br>c. A site plan showing details of the facility including, but not limited to:<br>i. Fences, easements, utilities, railroad spurs, buildings and other structures;<br>ii. Roads, entrances, parking areas, and driveways;<br>iii. Planned landscaping and screening; and | a, b, c: within report; meets Criterion 2 |
| d. In the case of a sanitary landfill:<br>i. Cross sections, both existing and proposed;<br>ii. All existing water wells, whether active or abandoned, within fifteen hundred (1,500) feet of the site;<br>iii. All ground water and/or methane monitoring wells, both existing and planned, whether public or private; and site.<br>iv. Core sample locations on and within two hundred (200) feet of the<br>v. Storage tanks, whether above ground or below ground; and,<br>vi. All utilities. | d. Not applicable |
| e. A statement of the plan of operation for the proposed facility, including, but not limited to, the following:<br>i. Method of landfilling, incineration, resource recovery or other process including flow diagrams depicting waste flow by type and volume from initial acceptance at the facility to final disposition;<br>ii. Hours of operation;<br>iii. Number, duties and training of facility personnel;<br>iv. Litter, vector, dust and odor control on-site;<br>v. Surface drainage and erosion control;<br>vi. Fire and hazardous material control;<br>vii. Corrective actions for spills and other operational accidents;<br>viii. Collection and disposal of leachate generated from activities on-site; and,<br>ix. Number and types of equipment proposed to be used. | e. within report (see the Operations Plan in Section 2.4 of the Criterion 2 Report); meets Criterion 2 |

| | |
|---|---|
| f. If applicable, the stages of development or use. | f. Not applicable |
| g. Building floor plans illustrating material handling equipment and processes as well as architectural elevations including exterior construction materials.<br>h. A stormwater management plan consistent with the Village Code and any NPDES permit or application thereof required by the Agency.<br>i. A closure and/or end use plan.<br>j. A summary of the experience of the applicant and the proposed operator in operating other pollution control facilities of a type similar to the proposed pollution control facility, including the location, dates of operation of such facilities, and any operating violations by the applicant or operator or any subsidiary or parent corporation of the applicant or operator within the last five (5) years at any facility in the State of Illinois that is of the same type as the facility that is the subject of the application (e.g., transfer station, sanitary landfill). The Director of Public Works shall determine the scope of information required under this paragraph and shall advise the applicant of such determination not later than fifteen (15) calendar days following the initial pre-filing meeting. | g. within report (see the Drawings section in the Criterion 2 Report); meets Criterion 2<br><br>h. within report (see Appendix 2-E in the Criterion 2 Report); meets Criterion 2. The Stormwater Management Plan was approved as part of the 2025 site construction and incorporated most of the Rantoul RTS plans<br><br>i. within report (see Section 2.4.20 of the Operations Plan in the Criterion 2 Report); meets Criterion 2<br><br>j. within report (see Appendix 2-B in the Criterion 2 Report); meets Criterion 2.<br><br>The Director of Public Works determined that the following information meets the scope of information required:<br><br>◆ A listing of municipal solid waste and/or recycling transfer stations, and similar facilities (landfills, hauling companies)<br>◆ Permitted within the state and operated by the applicant/operator<br>◆ Location and relevant dates<br>◆ Type of material permitted<br>◆ Any operating violations within the last five years<br>◆ Volume of municipal solid waste on a tons per day basis. |

## 2.3 Criterion 3

From the Act: *"the facility is located so as to minimize incompatibility with the character of the surrounding area and to minimize the effect on the value of the surrounding property" [415 ILCS 5/39.2(a)(iii)].*

| From Section 28-102(B)(3): | Foth's Comments: |
|---|---|
| The facility is located so as to minimize incompatibility with the character of the surrounding area and to minimize the effect on the value of the surrounding property.<br>a. Map showing land uses within two thousand five hundred (2,500) feet of the perimeter of the site.<br>b. Map showing zoning of all land within two thousand five hundred (2,500) feet of the perimeter of the site.<br>c. Village's comprehensive plan showing projected land uses of the site and within two thousand five hundred (2,500) feet of the perimeter of the site.<br>d. Report by MAI appraiser on projected impact on property values for the area within two thousand five hundred (2,500) feet of the facility if facility was constructed. | CEC Criterion 3 Report reviewed; 92 pages. Includes:<br>◆ Land Use Compatibility and Real Estate Impact Study by Associated Property Counselors, Ltd.<br>◆ Land Use and Planning Analysis by The Lannert Group, Inc.<br>a-d. within reports; meets Criterion 3 |

## 2.4 Criteria 4

From the Act: *"for a facility other than a sanitary landfill or waste disposal site, the facility is located outside the boundary of the 100-year floodplain or the site is flood-proofed" [415 ILCS 5/39.2(a)(iv)(A)].*

| From Section 28-102(B)(4): | Foth's Comments: |
|---|---|
| Flood Plain.<br>a. For a facility other than a sanitary landfill or waste disposal site, the facility is located outside the boundary of the one hundred-year flood plain or the site is floodproofed.<br>b. For a facility that is a sanitary landfill or waste disposal site, the facility is located outside the boundary of the one hundred-year flood plain, or if the facility is a facility described in subsection (b) of Section 22.19a of the Act, the site is flood-proofed:<br>i. A detailed topographic survey of the subject site.<br>ii. A map that shows the boundary of all one hundred-year floodplains within 500 feet of the site, if present.<br>iii. Statement by project architect and/or engineer that the site is or will be floodproofed if the site is within a one hundred-year floodplain.<br>iv. The identification of the drainage district, if any, in which the site is located. | CEC Criterion 4 Report reviewed; 6 pages.<br>a. within report; meets Criterion 4<br>b. not applicable |

## 2.5 Criteria 5

From the Act: *"the plan of operations for the facility is designed to minimize the danger to the surrounding area from fire, spills, or other operational accidents" [415 ILCS 5/39.2(a)(v)].*

| From Section 28-102(B)(5): | Foth's Comments: |
|---|---|
| The plan of operations for the facility is designed to minimize the danger to the surrounding area from fire, spills, or other operational accidents.<br>a. A statement of the plan of operation for the proposed facility, including, but not limited to, the following:<br>i. Hours of operation;<br>ii. Safety personnel;<br>iii. Fire and hazardous material control; and<br>iv. Corrective actions for spills and other operational accidents.<br>b. A statement of the operator's ability to acquire certificates of insurance to cover accidents, such as fires, explosions, non-sudden accidental occurrences and pollution impairment. | CEC Criterion 5 Report reviewed; 12 pages.<br>a, b: within report; meets Criterion 5. Hours of operation also stated in the Operations Plan in the Criterion 2 Report. |

## 2.6 Criterion 6

From the Act: *"the traffic patterns to or from the facility are so designed as to minimize the impact on existing traffic flows" [415 ILCS 5/39.2(a)(vi)].*

| From Section 28-102(B)(6): | Foth's Comments: |
|---|---|
| The traffic patterns to or from the facility are so designed as to minimize the impact on existing traffic flows.<br>a. A report of off-site traffic impact regarding the proposed site including the anticipated number of vehicles and their size, weight and directional distribution, and the classification of the roadways reasonably likely to be used by vehicles entering and exiting the site. The report shall include reasonably sufficient information regarding traffic on the relevant roadways for the Public Works Department to analyze potential negative impacts on traffic to and from the facility and on the pavement of the roadways used to access the facility. The report must be prepared by an engineer experienced in traffic engineering and registered in the State of Illinois. | CEC Criterion 6 Report reviewed; 153 pages. Includes:<br>◆ Traffic Impact Study by KLOA, Inc.<br>a. within report; meets Criterion 6<br>Foth requested comments from the Village Public Works Department on the traffic improvements at the intersection of the Service Road and Murray Road. The Director finds the Preliminary Engineering Plans in the Criterion 6 Report to be acceptable. The acceptance of the Preliminary Engineering Plans does not constitute approval of construction and final plans should be submitted to the Department for approval. |

## 2.7 Criterion 7

From the Act: *"if the facility will be treating, storing or disposing of hazardous waste, an emergency response plan exists for the facility which includes notification, containment, and evacuation procedures to be used in case of an accidental release" [415 ILCS 5/39.2(a)(vii)].*

| From Section 28-102(B)(7): | Foth's Comments: |
|---|---|
| If the facility will be treating, storing or disposing of hazardous waste, an emergency response plan for the facility.<br>a. A copy of the contingency plan prepared pursuant to the Resource Conservation and Recovery Act (42 U.S.C. § 6901 et seq.) The plan shall include, but is not limited to, notification, containment and evacuation procedures to be used in the event of an accidental release.<br>b. The chemical safety contingency plan prepared pursuant to the Illinois Chemical Safety Act.<br>c. Compliance with the requirements of the Illinois Emergency Management Agency.<br>d. Any other plan necessary to comply with this requirement. | CEC Criterion 7 Report reviewed; 4 pages.<br><br>Not applicable; Rantoul RTS is not seeking approval for hazardous waste acceptance. |

## 2.8 Criterion 8

From the Act: *"if the facility is to be located in a county where a county board has adopted a solid waste management plan consistent with the planning requirements of the Local Solid Waste Disposal Act or the Solid Waste Planning and Recycling Act, the facility is consistent with that plan" [415 ILCS 5/39.2(a)(viii)].*

| From Section 28-102(B)(8): | Foth's Comments: |
|---|---|
| The facility is consistent and in compliance with the Champaign County Solid Waste Management Plan. | CEC Criteria 8 Report reviewed; 129 pages. Includes:<br>◆ Champaign County SWMP 2022 Update<br><br>Rantoul RTS meets the requirements for Waste Transfer Stations and Host Agreement (page 5-12, 5-13, 5-14) in the 2022 Update |

## 2.9 Criterion 9

From the Act: *"if the facility will be located within a regulated recharge area, any applicable requirements specified by the Board for such areas have been met" [415 ILCS 5/39.2(a)(ix)].*

| From Section 28-102(B)(9): | Foth's Comments: |
|---|---|
| If the facility will be located within a regulated recharge area, proof that any and all applicable requirements specified by the Illinois Pollution Control Board for such area have been met. | CEC Criteria 9 Report reviewed; 3 pages.<br><br>Not applicable. |

# 3. Conclusion and Recommendations

Based on Foth's review as summarized in Section 2, the application for the Rantoul RTS meets the Village's ordinance Section 28-102(B).

Foth recommends **approval** of the application.

The Village may consider whether to include a condition to allow the Village to inspect the Rantoul RTS.

It is Foth's opinion that the Rantoul RTS, if properly operated, will be an asset to the Village for the following reasons.

- The lack of solid waste landfills within a suitable distance of the Village requires excessive haul distance by garbage trucks on a daily basis for solid waste disposal. See the attached Illinois Landfill Map with a 20-mile radius around the landfills surrounding the Village.
- Many smaller trucks travelling long distances contribute to diesel emissions, additional wear on roadways, and additional staffing challenges relative to using transfer trailers.
- If the Rantoul RTS is approved, regional traffic will likely decrease due to fewer garbage trucks driving to distant landfills.
- Village residents will have additional options for solid waste drop off, if needed.
- Recycling rates may increase due to the Rantoul RTS recycling operations.