

EXHIBIT A

R E S O L U T I O N

WHEREAS, the County of Lake owns and operates a sanitary sewer system serving incorporated and unincorporated communities in Northwest Lake County; and

WHEREAS, pursuant to the Regional Wastewater Plan, said Northwest sewer system is designed to serve the Village of Lake Villa; and

WHEREAS, on May 8, 1990 and August 14, 1990, the Lake County Board had approved two separate proposals for sewage disposal service to Lake Villa, neither of which were accepted by the Village of Lake Villa; and

WHEREAS, further negotiations with the Village of Lake Villa have resulted in an Agreement which provides for the abandonment of existing treatment facilities serving the Village and the transmission of sewage flows through the Northwest system to the Village of Fox Lake regional treatment plant; and

WHEREAS, the consolidation of sewage treatment facilities in Northwest Lake County is considered to be environmentally sound and economically cost effective; and

WHEREAS, the Village of Lake Villa has found the terms of said Agreement for Sewage Disposal to be acceptable; and

WHEREAS, the Public Service, Planning and Zoning, and Financial and Administrative Committees have reviewed said Agreement and recommend its adoption.

NOW, THEREFORE, BE IT RESOLVED, by this County Board of Lake County, Illinois, that the Chairman of the County Board and the Clerk of said County be and they are hereby authorized and

directed to execute the attached Agreement for Sewage Disposal with the Village of Lake Villa for connection of its local sewer system to the Northwest Regional Sewer System.

BE IT FURTHER RESOLVED, that the Chairman of the County Board and the Clerk of said County shall not so execute said Agreement unless and until the President and Board of Trustees of Lake Villa have first approved and authorized said Agreement and the President and Village Clerk shall have executed and attested said Agreement on or before May 31, 1991.

DATED at WAUKEGAN, LAKE COUNTY, ILLINOIS, on this 9th day of April, A.D., 1991.

EXECUTION COPY

AGREEMENT FOR SEWAGE DISPOSAL

Entered Into By and Between
The County of Lake, Illinois
and
The Village of Lake Villa, Illinois
As of
April 9, 1991

AGREEMENT FOR SEWAGE DISPOSAL

THIS AGREEMENT made and executed this 9th day of April, 1991, between the VILLAGE OF LAKE VILLA, a municipal corporation located in Lake County, Illinois, hereinafter referred to as the "Village", and the COUNTY OF LAKE, Illinois, hereinafter referred to as the "County".

W I T N E S S E T H:

WHEREAS, the public health, welfare, and safety of the residents of the Village and the residents of the County require the development of coordinated and adequate systems for the collection and treatment of sewage so as to eliminate pollution of lakes and streams; and

WHEREAS, the County has established a Department of Public Works pursuant to an Act of the General Assembly of the State of Illinois entitled "An Act in Relation to Water Supply, Drainage, Sewage, Pollution, and Flood Control in Certain Counties", as amended, for the purpose of performing the function of sewage disposal, has prepared a comprehensive plan for the disposal of sewage from areas of the County, and intends to develop the facilities needed to carry out such plan; and

WHEREAS, the County has entered into an agreement with the Village of Fox Lake whereby the Village of Fox Lake will perform the function of sewage treatment for the County in the Northwest Regional Area for certain fees as outlined in the agreement between Fox Lake and the County, which agreement and any amendments

thereto are, by this reference, incorporated herein and made a part hereof as if fully set forth; and

WHEREAS, the County has constructed an interceptor and trunk sanitary sewer system in the Northwest Regional Area to collect and transport sewage to the Fox Lake Plant; and

WHEREAS, the Village of Fox Lake proposes to expand its existing treatment plant to service the Northwest Regional Area in accordance with Northeastern Illinois Planning Commission and Lake County Waste Water Plan, and to provide sufficient treatment to meet water quality standards of the Illinois Pollution Control Board and Federal Environmental Protection Agency and County on the terms and conditions herein provided; and

WHEREAS, the Village of Lake Villa currently owns and operates a sewage treatment plant to serve portions of its jurisdiction and said plant has been placed on restricted status by the Illinois Environmental Protection Agency due to pollution being discharged therefrom into the waters of Lake County; and

WHEREAS, the elimination of the Lake Villa sewage treatment plant and diversion of its effluent to the Fox Lake plant was an alternative evaluated and recommended in the 1975 Facilities Plan for Wastewater Collection and Treatment in the Northwest Area of Lake County;

WHEREAS, Lake Villa has applied for, and NIPC has approved, an amendment to the 1975 Facilities Plan determining that elimination of the existing Lake Villa plant and diversion of sewage flows from Lake Villa to the Fox Lake sewage treatment plant through two connection points to the County's collection system

is the most cost effective solution to the long-term sewage treatment needs of Lake Villa;

NOW, THEREFORE, in consideration of the mutual covenants contained herein, it is hereby agreed as follows:

SECTION 1. DEFINITION. As used in this contract, unless the context shows clearly otherwise, the following shall mean:

- (a) "County's collection system" shall mean the facilities for receiving and transporting sanitary sewage and Industrial Wastes which County has obligated itself to receive under the terms of contracts with other persons, firms, corporations, or districts, together with any additions or extensions to such facilities constructed or otherwise incorporated into County's Northwest Project in the future.
- (b) "Customer" shall mean any dwelling, business, industry or institution that is connected to the Village system and that discharges sewage, either directly or indirectly, into the County's collection system.
- (c) "B.O.D." (Biochemical Oxygen Demand) shall mean the quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedure in five days at 20 C., expressed in parts per million.
- (d) "Garbage" shall mean the solid wastes from the preparation, cooking, and dispensing of food and from handling, storage, and sale of produce.

- (e) "Industrial Waste" shall mean the liquid and water-carried wastes from industrial processes, as distinct from Sanitary Sewage.
- (f) "Infiltration Water" shall mean the water which leaks into a sewer.
- (g) "Meter" shall mean any device used to measure flow.
- (h) "pH" shall mean the common logarithm of the reciprocal of the weight of hydrogen ions in grams per liter of solution.
- (i) "Properly Shredded Garbage" shall mean Garbage that has been shredded to such degree that all particles will be carried freely under the flow conditions normally prevailing in public sewers, with no particle greater than $\frac{1}{2}$ inch in any dimension.
- (j) "Population Equivalent" (P.E.) shall mean:
- (1) The calculated population that would normally contribute 100 gallons of sewage per day containing 0.167 pounds of 5 day B.O.D. and 0.22 pounds of suspended solids.
 - (2) For industrial waste, the estimated number of people contributing sewage equal in strength to a unit volume of the industrial waste on the basis of the highest parameter set forth in Section 1(j)(1) hereof.
- (k) "Residential Customer Equivalent" shall mean a single family dwelling or any other Customer, based on

discharge of 2½ times the Population Equivalent set forth in Section 1 (j)(1) hereof.

- (l) "Sanitary Sewage" shall mean liquid and water-carried waste discharged from the sanitary conveniences of dwellings and other buildings.
- (m) "Sewage" shall mean Sanitary Sewage and Industrial Waste, together with such Infiltration Water as may be present.
- (n) "Suspended Solids" shall mean solids that either float on the surface or are in suspension in water, sewage, or other liquids, which are removable by laboratory filtering, expressed in milligrams per liter.
- (o) "Sewer" shall mean a public sanitary sewer of 8" in diameter or larger but does not mean storm drain carrying unpolluted water.
- (p) "Sewer Surcharge" shall mean a charge over and above the normal service charge to a customer for additional service as agreed upon by the Village.
- (q) "Village" shall mean the Village of Lake Villa, a municipal corporation of the State of Illinois, and shall include all areas within its boundaries as they may from time to time exist.
- (r) "Village service area" shall mean the area outlined on Exhibit A attached hereto and made a part hereof; provided, however, that in the event any portion of the area outlined on Exhibit A is annexed by a city or village other than the Village, such portion thus

annexed shall be deleted from the Village service area and shall no longer be the subject of this Agreement.

- (s) "Village service territory" shall mean that portion of the Village service area lying outside the boundaries of the Lakes Region Sanitary District, as such boundaries may from time to time exist.
- (t) "Village system" shall mean all sewers, lift stations, connecting sewers, and sewage treatment facilities presently existing or to be constructed in the future, that are owned, operated, or maintained by the Village.

SECTION 2. SEWER SERVICE.

- (a) Except as provided in Section 2(c) below, the Village agrees to deliver to the County's collection system all of the sewage collected by the Village system, and the County agrees, subject to the conditions precedent and limitations set forth in Section 3 below and to the other terms and conditions of this Agreement, to accept such sewage from the Village.
- (b) Except as provided in Section 2(c) below, the Village agrees that all future sewage customers of the Village system shall be served in like manner and bound by the County rules and regulations. Nothing in this Section 2(b) shall limit the Village's discretion in establishing reasonable fees and rates related solely to the Village system for its customers.
- (c) The Village agrees that during the term of this Agreement, the Village will not construct, cause, permit, or

consent to the construction of sewage treatment facilities within the jurisdiction of the Village, present or future, without the written consent of the County; provided, however, that in the event the County or the Fox Lake Regional Treatment Plant is unable or unwilling to provide capacity sufficient to serve all areas of the Village, the Village may, without the consent of the County, make alternate arrangements for sewage treatment for such areas or developments within the Village as the County is unable or unwilling to serve.

SECTION 3. CONDITIONS PRECEDENT AND LIMITATIONS.

- (a) The obligation on the part of the County to receive sewage from the Village shall be subject to the following conditions precedent:
- (1) The construction by the Village, at its sole cost and expense, as part of the Village system, of a connecting sewer between the existing Village system and the County's interceptor sewer located on Illinois Route 59 at the intersection of Monaville Road; said sewer shall not exceed a capacity of 11,700 P.E.
 - (2) If required to serve properties satisfying the conditions set forth in Section 3(b) below, the construction by the Village, at its sole cost and expense, as part of the Village system, of a connecting sewer between the existing Village system

and the County's Petite Lake Road Pumping Station located on Illinois Route 59 north of Petite Lake Road; said sewer shall not exceed a capacity of 7200 P.E.

(3) The ability of the regional sewage treatment plant at Fox Lake to accept sewage that the Village delivers to the County's collection system for treatment and disposal in compliance with all applicable laws and regulations and the legal right of the County to deliver said sewage to said plant for such purposes.

(4) The securing of an amendment to the Areawide Water Quality Management Plan for Northeastern Illinois by the Village for a facility plan amendment that will permit the Village to phase out its treatment plant. The County agrees to support the Village's application for such an amendment, but the Country has no obligation to incur any expenses whatsoever in connection with such support.

(b) In addition to the conditions set forth in Section 3(a) above, the County shall have no duty to accept sewage from any dwelling, business, industry or institution, and the Village shall not permit any dwelling, business, industry or institution to connect to the Village system, unless:

(1) Such dwelling, business, industry or institution is within the Northwest Facilities

Planning Area of the County of Lake under the Areawide Water Quality Management Plan for Northeastern Illinois and the Village service area; and

- (2) The sum of the actual sewage flow from the Village service territory through the Village system to the County's collection system, plus the sewage flow projected by the County from "committed development" within the Village service territory, plus the projected sewage flow from the dwelling, business, industry or institution proposed to be connected, if located within the Village service territory, does not exceed the population equivalent represented by the most recent 20-year population forecast of the Northeastern Illinois Planning Commission (the "NIPC forecast") for the Village service territory. For purposes of this paragraph, "committed development" means any development designed to be served by sanitary sewer for which a final plat has been approved, a planned unit development that has received approval of its final development plan, or any development that has received permit or construction approval from the Illinois Environmental Protection Agency for sewer

extension; provided the County has not received written notice that such approvals have been revoked or terminated. The parties agree that the year 2010 NIPC forecast, as adjusted for non-residential use, for the Village service territory is 8,505 P.E. Upon the request of either party, population equivalents for the Village service territory shall be adjusted based upon the most recent update of the NIPC forecast, but in any event, the P.E. shall not be less than 8,505 P.E. If the parties cannot agree on an appropriate adjustment within 90 days after such a request, the County and the Village shall mutually appoint a professional planning or engineering consultant whose determination of the population equivalents for the Village service territory under the updated NIPC forecast shall be final. If the publication of periodic updates of the NIPC forecast is discontinued, the parties shall accept comparable forecasts as computed and published by an agency of the state or such other recognized authority then to be selected by the parties.

- (c) No points of connection shall be permitted between the Village system and the County's collection system,

except as noted in Sections 3(a)(1) and (2) above. Said points of connection shall not exceed the sizes noted in Sections 3(a)(1) and (2) above, which have been designed to accommodate projected growth until the year 2030.

- (d) Notwithstanding anything in this Agreement to the contrary, the County shall not be required to accept, and the Village shall not be entitled to collect or deliver, sewage from any dwelling, business, industry or institution that lies:
- (1) within the Lakes Region Sanitary District without the prior written consent of the Lakes Region Sanitary District; or
 - (2) within any unincorporated area of the County without the prior consent of the County.
- (e) Subject to the conditions in Section 3(a), 3(b), 3(c) and 3(d) above, and the other terms, conditions and provisions of this Agreement, the County will hold itself available, within the limits of available capacity, to service Village customers with sewers on a first come, first serve basis after the proper connection fees (as set forth herein) have been paid to the County.

SECTION 4. COUNTY REGULATIONS. The County reserves the right to enforce "An Ordinance Regulating the Use of Public and Private Sewer and Drains, Private Sewage Disposal, the Installation and Connection of Building Sewers, and the Discharge of

Waters and Wastes into the Public Sewer Systems of the County of Lake in the State of Illinois" dated February 9, 1988, and any amendments thereto, a copy of which is attached hereto as Exhibit B, for all sewers connected to the Village system and served by the County's collection system. The Village shall be notified of any proposed changes in said County ordinance and shall have 30 days to object to said proposed changes. The maximum infiltration rate for new sanitary sewers constructed within the Village system and any new tributary lateral sewers shall conform to the rules and regulations of the Illinois Environmental Protection Agency.

SECTION 5. ADMISSIBLE WASTES. In order to permit proper treatment and disposal of the Village sewage, Village agrees to prohibit discharge into the County's collection system elements not herein specified as admissible. Discharges into the County's collection system shall consist only of sewage, properly shredded garbage, and other wastes within the following parameters:

- (a) B.O.D. of sewage discharged into the County's collection system as determined by standards methods shall not exceed 300 mg/l; and
- (b) Suspended Solids discharged into the County's collection system, as determined by standard methods, shall not exceed 400 mg/l; and
- (c) The pH of sewage discharged into the County's collection system shall not be lower than 5.5, nor higher than 10.0. Acid wastes must be neutralized to a pH of 5.5 or more; and

- (d) Unionized Hydrogen Sulfide in sewage at points of discharge into the County's collection system will not exceed 1.5 p.p.m. as determined by the Titrimetric Method and Calorimetric Method outlined in Standard Methods for the Examination of Water and Wastewater, 11th Edition, published by American Public Health Association, Inc.

In the event that changes in applicable rules, regulations, or laws require the County to modify the above parameters, the Village and its customers shall be required to comply with such modified parameters.

SECTION 6. CHARGES FOR SEWAGE TREATMENT AND DISPOSAL.

- (a) The Village shall be obligated to pay the County, from revenues derived from the operation of the Village system, service charges and any surcharges that may be required for its residential, commercial, institutional, and industrial customers pursuant to the County's current User Charge System attached hereto as Exhibit C. The Village shall make payment in full of said charges to the County within fifteen (15) days after the due date of its periodic customer service billing, along with a summary statement of customers and amounts billed. A complete statement of accounts and billing records shall be made available to the County upon request. In addition, the County shall have access to the Village's records relating to the Village system.

(b) The Village shall pay to the County, for every dwelling, business, industry and institution connecting to the Village system and discharging to the County's collection system after the date of this Agreement, a connection fee in the amount of \$1,300.00 per residential customer equivalent. In determining multifamily housing connection fees, the following schedule shall be used per unit:

3 or more bedrooms	100% Residential Customer Equivalent
2 bedrooms	80% Residential Customer Equivalent
1 bedroom	75% Residential Customer Equivalent

(c) The Village assumes the responsibility to collect, and shall be responsible for, all sewer connection fees, service charges, and surcharges as provided for in this Agreement.

SECTION 7. RATE ADJUSTMENTS.

(a) The system of rates and charges as set forth in Section 6, shall be related to the services and facilities provided by the County to the Village, and shall be equitable and comparable to those charges at similar classes of users within the Northwest Service Area.

The County may adjust rates and charges for providing sewer services and the use of facilities by the County to the Village and to other classes of users, such as will always, together with any other monies legally available for and applied to such purpose, provide

revenues sufficient to pay the cost of maintenance and operation, the principal of and interest upon the County's Water and Sewer System Revenue Bonds, to provide a reasonable depreciation fund, and such other reserves and sinking funds as may be deemed necessary or desirable by the County for the payment of such bonds and for the extension or improvement of the sewage facilities as provided by "An Act in Relation to Water Supply, Drainage, Sewage, Pollution and Flood Control in Certain Counties", approved July 22, 1959, as amended, and by the County's ordinance creating the Waterworks and Sewerage System of the County, enacted October 13, 1964, as amended.

- (b) Except as hereinafter provided in Section 7(c), rates and charges may be adjusted by the County from time to time as necessary to meet its bond and other financial obligations. Written notice of proposed changes shall be given by certified mail to each of the participating municipalities and sanitary districts. The County shall include with such notice copies of all audits, engineering reports, financial analysis, or any other data upon which the proposed adjustment is based. Within 30 days thereafter, any participating municipality or sanitary district may file with the County its written objection to such proposed change, which must be accompanied by data supporting such objection. If such objection cannot be resolved promptly, three

(3) registered professional consulting engineers, recognized for their experience in evaluating and recommending rates and charges for water and sewer utility services shall be appointed to consider the need for such changes, one to be appointed by the County, one by the participating municipalities and sanitary districts, and one by mutual consent of the other two appointees. They shall review all data presented and all other material deemed relevant and, within 30 days after their appointment, shall report their findings and recommendation in light of the commitments, obligations, contracts, and covenants of the County, which commitments, obligations, contracts, and covenants shall be the ultimate determinant of rate adjustments made by the County.

- (c) The County shall notify the Village of any pending rate increase proposed by the Village of Fox Lake of which it has received notice. The Village may participate in those rate hearings as an interested party. Any rate increase determined to be required by Fox Lake in order to meet requirements of its system, shall be reflected in the rate the County charges the Village Customers, without the need for additional hearings.

SECTION 8. COUNTY RECORDS. The County shall keep permanent books and records of its entire System with separate accounting for revenue and expenses relating to operation of the County's collection system. As part of such records, on or before the

30th day of November of each year, it shall determine its total monetary requirements for the disposal of sewage during the next succeeding fiscal year. Such requirements shall include the cost of administration, operation, maintenance, establishment of necessary working capital and reserves, the requirements of all ordinances providing for the issuance of revenue bonds of the County to finance the acquisition, construction, or use of sewerage facilities, plus an amount not to exceed 10% of the foregoing requirements for general administrative overhead expenses. A copy of same shall be delivered to the Village on or before 30 days from said date. The Village shall have access to the County records.

SECTION 9. METERING. Upon request of the County or at the Village's own option, the Village shall, at its own expense, furnish, install, own, operate, and maintain metering equipment and devices of standard type for measuring all sewage delivered by the Village to the County's collection system pursuant to this Agreement. Such meters may be located where the Village's connecting sewers connect to the County's pumping station or interceptor sewer, as the case may be. The County shall have access at all reasonable times to such metering devices for inspection and examination. All calibration, adjustment, reading, and recording of such metering devices shall be the responsibility of the Village.

SECTION 10. OWNERSHIP AND MAINTENANCE.

- (a) The County shall retain ownership of all sewer pipes and mains, interceptors, and other facilities in the

County's collection system that it now owns, or that it may in the future construct, or that it may in the future accept dedication of from the Village. The County shall maintain and operate the County's collection system and shall bear all risk of loss or damage to said system, all at its sole cost.

- (b) The Village shall retain ownership of all sewer pipes and mains and interceptors in the Village system that it now owns or that it may in the future construct, including but not limited to any future extensions thereto that are now located or that may be located within the Village, excluding any interceptors the County now owns or may in the future construct for transmission of sewage from or through the Village or any other facilities the County may construct in, or accept dedication of from, the Village. The Village shall maintain and operate the Village system and shall bear all risk of loss or damage to said system, all at its sole cost.

SECTION 11. PRETREATMENT. The Village shall develop a pretreatment program to detect and enforce against violations of pretreatment standards promulgated under Section 307(b) and (c) of the Federal Clean Water Act, including an inventory of industrial users tributary to the Village system and an inspection and enforcement program designed to identify and eliminate violations of pretreatment standards. The County reserves the right to require any additional program of pretreatment by Customers

within the Village of sewage of unusual quality or composition as required by federal or State of Illinois law.

SECTION 12. REGULATORY BODIES. This Agreement shall be subject to all valid rules, regulations, and laws applicable hereto passed and promulgated by the United States of America, the State of Illinois, or any other governmental body or agency having lawful jurisdiction, or any authorized representative or agent of any of them.

SECTION 13. EPA BOUNDARY AMENDMENTS. The County agrees not to oppose or object to any petition to amend the Areawide Water Quality Management Plan for Northeastern Illinois to add any parcel within the Village service area to the Northwest Facilities Planning Area of the County of Lake.

SECTION 14. CONTRACTS WITH OTHERS. The County reserves the right to contract with the Lakes Region Sanitary District within the District (but not within the Village service territory) or with other persons, natural or corporate, private or public, located outside the Village service area, to perform services similar to those to be performed under this Agreement; provided, however, that in the event the Village denies a request to provide sewer service to any property outside the Village but in the Village service area, the County also may, without the consent of the Village, enter into contracts to provide sewer service, either directly or indirectly, to such property.

SECTION 15. ASSIGNMENT. Neither of the parties hereto shall have the right to assign this Agreement or any of its rights and obligations hereunder nor to terminate its obligations

hereunder by dissolution or otherwise without first securing the written consent of the other party. This Agreement shall be binding upon and inure to the benefit of the respective successors and assigns of the parties hereto.

SECTION 16. EFFECTIVE DATE AND TERM OF CONTRACT. This Agreement shall be in full force and effect and binding upon the parties hereto for a period of 30 years from the date of execution.

SECTION 17. NOTICE. Whenever in this Agreement notice is required to be given the same shall be given in writing, by Certified Mail, addressed to the respective parties at the following addresses:

Village of Lake Villa
Village Clerk
P.O. Box 176
65 Cedar Avenue
Lake Villa, IL 60046

County of Lake
Department of Public Works
650 Winchester Road
Libertyville, IL 60048

unless a different address shall be hereafter designated in writing by either of the parties. The date of giving such notice shall be deemed to be the date of mailing thereof. Billings for and payments of sewage disposal costs may be made by regular mail.

SECTION 18. EXECUTION OF DOCUMENTS. This Agreement shall be executed in three counterparts, any of which shall be regarded for all purposes as one original. Each party agrees that it will execute any and all deeds, instruments, documents, and resolution or ordinances necessary to give effect to the terms of this Agreement.

SECTION 19. AMENDMENTS; WAIVER. This Agreement may not be amended or modified in any respect except by written agreement expressly referring to this Agreement and duly authorized, executed and delivered by authorized representatives of the parties hereto in accordance with applicable Illinois statutory procedures. The Village acknowledges and agrees that, in entering into this Agreement, the County is not holding itself out as a public utility nor as in any other manner offering to provide sewer service to the Village except as set forth in this Agreement. No waiver by either party of any term or condition of this Agreement shall be deemed or construed as a waiver of any other term or condition, nor shall waiver of any breach be deemed to constitute a waiver of any subsequent breach whether of the same or different provisions of this Agreement.

SECTION 20. REMEDIES. The parties to this Agreement shall have all of the remedies provided by the laws of the State of Illinois applicable to an Agreement of this type.

SECTION 21. ENTIRETY. This Agreement merges and supersedes all prior negotiations, representations, and agreements between the parties hereto relating to the subject matter hereof and constitutes the entire contract between the parties concerning the disposal of sewage by the Village and acceptance of such sewage by the County for disposal.

SECTION 22. SEVERABILITY. If any section, clause, sentence, or provision of this Agreement shall be held invalid, the validity of any other part of this Agreement, which can be given

effect without such invalid part(s), shall not be affected thereby.

IN WITNESS WHEREOF, the parties have executed this Agreement as of the day and year first above written.

VILLAGE OF LAKE VILLA

By: Joyce F. Frayer
Joyce Frayer
Village President

ATTEST:

Judith P. Dewar
Judith P. Dewar
Village Clerk

COUNTY OF LAKE

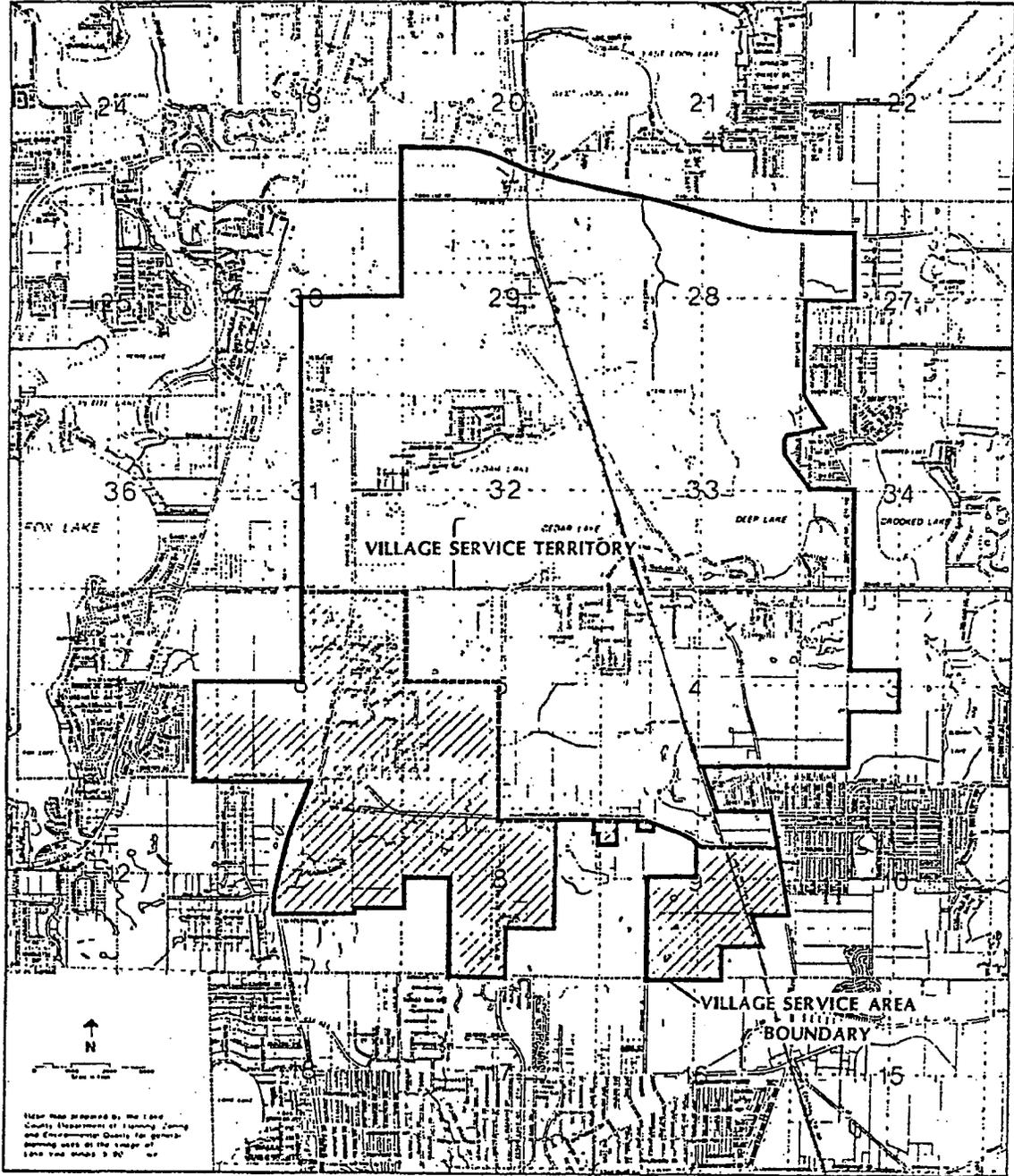
By: Robert J. [Signature]
Chairman, Lake County Board

ATTEST:

Paula [Signature]
County Clerk

EXHIBIT A

VILLAGE SERVICE AREA



LAKE VILLA SEWER SERVICE AREA MAP
JANUARY 28, 1991

 LAKES REGION SANITARY DISTRICT

EXHIBIT A



EXHIBIT B

Illinois Environmental Protection Agency
Permit Section, Division of Water Pollution Control
P.O. Box 19276
Springfield, IL 62794-9276
Application For Permit Or Construction Approval
WPC-PS-1

For IEPA Use:

(page 1 of 2)

1. Name and Location: C & F PACKING COMPANY, INC., 515 PARK AVENUE, LAKE VILLA, IL 60046
Name of Project: C & F Packing Company Supplemental Permit Application to revise IEPA Permit Number 2002-EN-0069-1
Municipality or Township: LAKE VILLA County: LAKE

2. Brief Description of Project: Pretreatment Equipment for Wastewater Source which Processes Cooked Meats to Produce Pizza
Toppings and Soup Bases, Pretreatment Equipment Includes Equalization Tank and Dissolved Air Flootation Gravity Separator.

3. Documents Being Submitted: If the project involves any of the items listed below, submit the corresponding schedule, and check the appropriate spaces.

Table with 2 columns: Item Name and Checkmark/Initials. Items include Private Sewer Connection/Extension, Sewer Extension Construct Only, Sewage Treatment Works, Excess Flow Treatment, Lift Station/Force Main, Sludge Disposal, Spray Irrigation, Septic Tanks, Industrial Treatment Pretreatment, Waste Characteristics, Erosion Control, and Trust Disclosure.

Plans: - Title _____ Number of Pages: _____

Specifications: Title _____ Number of Books/Pages: _____

Other Documents (Please Specify) _____

4. Land Trust: Is the project identified in item number 1 herein, for which a permit is requested, to be constructed on land which is the subject of a trust? Yes X No
If yes, Schedule T (Trust Disclosure) must be completed and item number 7.1.1 must be signed by a beneficiary, trustee, or trust officer.

5. This is an Application for (Check Appropriate Line):
A. Joint Construction And Operating Permit
B. Authorization to Construction (See Instructions) NPDES Permit No. IL00 _____ Issue Date _____
C. Construct Only Permit (Does Not Include Operations)
D. Operate Only Permit (Does Not Include Construction)

6. Certifications and Approval:
6.1 Certificate by Design Engineer (When required; refer to instructions)
I hereby certify that I am familiar with the information contained in this application, including the attached schedules indicated above, and that to the best of my knowledge and belief such information is true, complete, and accurate. The plans and specifications (specifications other than Standard Specifications or local specifications on file with this Agency) as described above were prepared by me or under my direction.

Engineer: JEFFREY ZAK Name, 062-052241 Registration Number

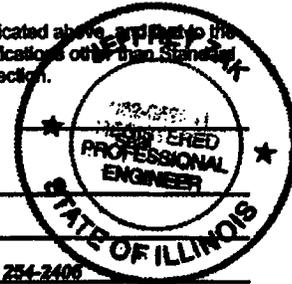
Firm: SCIENTIFIC CONTROL LABORATORIES, INC.

Address: 3158 SOUTH KOLIN AVENUE

CHICAGO, IL 60623

Phone Number: (773) 254-2400

Signature X [Handwritten Signature]



7. Certifications and Approvals for Permit:
7.1 Certificate by Applicant(s)
I/We hereby certify that I/we have read and thoroughly understand the conditions and requirements of this Application, and am/are authorized to sign this application in accordance with the Rules and Regulations of the Illinois Pollution Control Board. I/We hereby agree to conform with the Standard Conditions and with any other Special Conditions made part of this Permit.

7.1.1 Name of Applicant For Permit to Construct: C & F PACKING COMPANY, INC.
515 PARK AVENUE Street, LAKE VILLA City, IL State, 60046 Zip Code

Signature X [Handwritten Signature] DENNIS OLSON Printed Name, 847-245-2000 Phone Number

Title: CO-OWNER Organization: C & F PACKING COMPANY, INC.

(page 2 of 2)

7.1.2 Name Of Applicant For Permit To Own and Operate _____

 Street City State Zip Code

Signature X _____
 Printed Name Phone Number

Title _____

7.2 Attested (Required When Applicant is a Unit of Government)

Signature X _____ Date _____ Title _____
 (City Clerk, Village Clerk, Sanitary Clerk, Etc.)

7.3 Applicants from non-governmental applicants which are not signed by the owner, must be signed by a principal executive officer of at least the level of vice president, or a duly authorized representative.

7.4 Certificate By Intermediate Sewer Owner

I hereby certify that (Please check one):

1. The sewers to which this project will be tributary have adequate reserve capacity to transport the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

Name and location of sewer system to which this project will be tributary: N 4739 a6 / E 606 134

Sewer System Owner VILLAGE OF LAKE VILLA

65 CEDAR STREET LAKE VILLA ILLINOIS 60046
 Street City State Zip Code

Signature X _____ Date _____ Title MAYOR

7.4.1 Additional Certificate By Intermediate Sewer Owner

I hereby certify that (Please check one):

1. The sewers to which this project will be tributary have adequate reserve capacity to transport the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

Name and location of sewer system to which this project will be tributary: Northwest Interceptor NW Sewer

Sewer System Owner Lake County Public Works

650 Winchester Road Libertyville Illinois 60048
 Street City State Zip Code

Signature X _____ Date _____ Title _____

7.5 Certificate By Waste Treatment Works Owner

I hereby certify that (Please check one):

1. The waste treatment plant to which this project will be tributary has adequate reserve capacity to treat the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

I also certify that the industrial waste discharges described in the application is capable of being treated by the treatment works.

Name and location of waste treatment works to which this project is tributary: NWR WRF

Treatment Works Owner VILLAGE OF FOX LAKE

200 INDUSTRIAL DRIVE FOX LAKE ILLINOIS 60020
 Street City State Zip Code

Signature X _____ Date _____ Title _____

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

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, Illinois 62794-9276

SCHEDULE G SLUDGE DISPOSAL & UTILIZATION

1. Name of Project C & F Packing Company Supplemental Permit Application to Revise IEPA Permit Number 2002-EN-0089-1

2. General Information

2.1 Source(s) Wastewater from the Cleaning and Sanitation of Meat Processing Equipment

2.2 Production Volume per year Oil = 312,000 lbs Tons per year Oil = 156 tpy
Sludge = 624,000 lbs Sludge = 312 tpy

2.3 Sludge to be disposed of is: Liquid Dry

2.4 Sludge is: Aerobically digested Anaerobically digested Heat anaerobically digested Raw Chemically Stabilized
Composted Wastewater Lagoon WTP Lime WTP Alum WTP Iron Other If other, describe Oil/Grease/Sludge
Mixture If mixture, describe _____

2.5 Is the sludge defined as hazardous by State or Federal Law? YES NO. If yes, basis _____

2.6 Is sludge to be stored on the STP site? YES NO. If yes, type of storage, lagoon storage tank other _____
If other, describe _____ capacity of storage, _____ cu. ft.

2.7 Sludge Hauling

2.7.1 Name(s), address(es) and Illinois Transporters I.D. Numbers SLUDGE: BYTEC, 1037 8TH STREET, MONROE, WI 53566 (ID #2931)
OIL: ANAMEX, 605 BASSETT ST., DEFOREST, WI 53532

2.7.2 For industrial generators, has Illinois Generator Number and Authorization Number been issued? YES NO. If no, contact the Division of Land Pollution Control

Illinois Generator ID Number 0970845054

Authorization Number NA

3. Methods of Sludge Disposal and/or Utilization

3.1 Land Application

3.1.1 Indicate the number of dry tons of sludge per year to be disposed by each of the following methods:

Agricultural land Commercial Fertilizer Production Dedicated Land Disposal Disturbed Land Reclamation Silviculture
Horticultural Lands Public Distribution Other If other, specify _____

3.1.2 Sludge Disposal Site Location. Provide a map (USGS Quadrangle map or plat map) showing location.

Name of USGS Quadrangle (7.5 or 15 minute) or plat map All Sludge is sent to Bytec of Monroe, WI.

3.1.3 Provide soil survey map and soil description for disposal site. Identify name of soil survey and map sheet number for each soil survey map provided.

* All 312 tpy of sludge is hauled away by Bytec and used to make fertilizer

3.1.4 Is sludge to be stored at disposal site? YES NO. If yes, describe and state the storage volume _____ cubic feet

3.1.5 Provide a copy of sludge user information sheet and completed, signed copies for any known users.

3.1.6 In a narrative description provide operation practices and design features to prevent ground and/or surface water pollution, portable water supply wellhead protection and other buffer distances, calculations supporting storage capacity, total acres available, soil characteristics, operational contingencies, etc.

All sludge is sent to Bvtec of Monroe, WI

3.1.7 Submit calculations of sludge application rate for agronomic rate, organic loading, and metal loading rate.

3.2 Landfilling NA

3.2.1 Sanitary Landfill Special Waste Landfill Hazardous Waste Landfill Other If other, specify _____

3.2.2 Name and Location of Landfill(s) _____

3.2.3 IEPA Permit Number(s) _____ ; _____ ;

3.3 Incineration NA

3.3.1 Name and Location _____

3.3.2 IEPA Permit Number(s) _____ ; _____ ;

3.3.3 Ultimate Disposal of Incinerator Residue _____

**** OTHER: Oil is sold to & hauled by a rendering company, Anamex of Deforest WI, which sells the rendered material to companies who manufacture cosmetic products.**

4. Sludge Characteristics

Submit complete analyses of sludge characteristics in mg/kg dry wt. basis unless otherwise indicated. The analyses shall be performed unless the sludge is disposed of by incineration or at an off-site landfill. Analyses performed shall include but not be limited to the parameters below:

Parameter	Parameter
% TS	Sulfur
% VS	Aluminum (total)
COD mg/l	Arsenic (total)
pH	Barium (total)
BOD5 mg/l	Cadmium (total)
Acidity meq of CaCO3 at pH _____	Cobalt (total)
Alkalinity meq CaCO3 at pH _____	Chromium, hex (total)
Oil and Grease mg/l	Chromium (total)
Phenols mg/l	Copper (total)
Cyanide	Iron (total)
Sulfate (total) mg/l	Mercury (total)
Sulfide (total) mg/l	Manganese (total)
Sodium	Molybdenum (total)
EC mmhos/cm	Nickel (total)
TOC	Lead (total)
Ammonia mg/l	Selenium (total)
Total Kjeldahl Nitrogen mg/l	Vanadium (total)
Phosphorus	Zinc (total)
Potassium	Radium 226 pCi/g
% Volatile Acids, if anaerobically digested	Radium 228 pCi/g
	Other*

*include results of any hazardous waste characteristics tests performed for: 1) EP Toxicity, 2) Corrosivity, 3) Ignitability, and 4) Reactivity

***** PCB 2006-053 *****

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DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, IL 62708

SCHEDULE J INDUSTRIAL TREATMENT WORKS CONSTRUCTION OR PRETREATMENT WORKS

1. **NAME AND LOCATION:** C & F PACKING COMPANY, INC., 515 PARK AVENUE, LAKE VILLA, IL 60046
- 1.1 Name of project C & F Packing Company Supplemental Permit Application to Revise IEPA Permit Number 2002-EN-0089-1
- 1.2 Plant Location
- 1.2.1 4 LAKE VILLA 10
Quarter Section Section Township Range P.M.
- 1.2.2 Latitude 42 ° 24 ' 30 " North
Longitude 88 ° 4 ' 30 " West
- 1.2.3 Name of USGS Quadrangle Map (7.5 or 15 Minutes) ANTIOCH (7.5 MINUTES)
2. **NARRATIVE DESCRIPTION AND SCHEMATIC WASTE FLOW DIAGRAM:** (see instructions)
See Appendix A
- 2.1 **PRINCIPAL PRODUCTS:** COOKED PROCESSED MEAT PRODUCTS
- 2.2 **PRINCIPAL RAW MATERIALS:** COOKED MEATS: PORK, BEEF, CHICKEN; PROCESS ADDITIVES INCLUDE SALT, SOY & SPICES.
3. **DESCRIPTION OF TREATMENT FACILITIES:**
- 3.1 Submit a flow diagram through all treatment units showing size, volumes, detention times, organic loadings, surface settling rate, weir overflow rate, and other pertinent design data. Include hydraulic profiles and description of monitoring systems.
- 3.2 Waste Treatment Works is: Batch Continuous ; No. of Batches/day , No. of Shifts/day 2
- 3.3 Submit plans and specifications for proposed construction.
- 3.4 Discharge is: Existing ; Will begin on
4. **DIRECT DISCHARGE TO:** Receiving Stream Municipal Sanitary Sewer Municipal storm or municipal combined sewer . If the receiving stream or storm sewer indicated complete the following:
Name of receiving stream ; tributary to ;
tributary to ; tributary to .
5. Is the treatment works subject to flooding? If so, what is the maximum flood elevation of record (in reference to the treatment works data) and what provisions have been made to eliminate the flooding hazard? NO
6. **APPROXIMATE TIME SCHEDULE:** Estimated construction schedule
- Start of Construction 09/02/02; Date of Completion 09/20/02
Operation Schedule NA; Date Operation Begins 09/20/02
100% design load to be reached by year NA

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

- 7.1 Design population equivalent (one population equivalent is 100 gallons of wastewater per day, containing 0.17 pounds of BOD₅ and 0.20 pounds of suspended solids;
 BOD 5800 (Actual Maximum) ; Suspended Solids 1570 (Actual Maximum) ; Flow 2160 (Actual Maximum)
- 7.2 Design Average Flow Rate 175 gpm ; 252,000 gpd (Based on 24 hours per day) MGD.
- 7.3 Design Maximum Flow Rate 175 gpm ; 252,000 gpd (Based on 24 hours per day) MGD.
- 7.4 Design Minimum Flow Rate 0 MGD.
- 7.5 Minimum 7-day, 10-year low flow NA cfs NA MGD.
 Minimum 7-day, 10-year flow obtained from NA
- 7.6 Dilution Ratio NA ; _____
8. FLOW TO TREATMENT WORKS (if existing):
- 8.1 Flow (last 12 months)
- 8.1.1 Average Flow NA MGD
- 8.1.2 Maximum Flow NA MGD
- 8.2 Equipment used in determining above flows _____
9. Has a preliminary engineering report for this project been submitted to this Agency for Approval?
 YES ___ NO X. If so, when was it submitted and approved. Date Submitted _____
 Certification # _____
 Dated _____
10. List Permits previously issued for the facility: 2002-EN-0089, 2002-EN-0089-1
11. Describe provisions for operation during contingencies such as power failures, flooding, peak loads, equipment failure, maintenance, shut-downs and other emergencies.
The Pretreatment system will not operate under any of the above conditions.
12. Complete and submit Schedule G if sludge disposal will be required by this facility.
13. WASTE CHARACTERISTICS: Schedule N must be submitted.
14. TREATMENT WORKS OPERATOR CERTIFICATION: List names and certification numbers of certified operators:
Greg Rymer

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

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DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, IL 62706

SCHEDULE N WASTE CHARACTERISTICS

1. Name of Project C & F Packing Company Supplemental Permit Application to Revise IEPA Permit Number 2002-EN-0089-1

	EXISTING	PROPOSED-DESIGN
2.1 Average Flow (gpd)	<u>144,000</u>	<u>252,000*</u>
2.2 Maximum Daily Flow (gpd)	<u>216,000</u>	<u>252,000*</u>

2.3 TEMPERATURE * based on a 24 hour work day

Time of year	Ave. Intake Temp. F	Ave. Effluent Temp. F	Max. Intake Temp. F	Max. Effluent Temp. F	Max Temp Outside Mixing Zone F
SUMMER	<u>NA</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
WINTER	<u>NA</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

2.4 Minimum 7-day, 10-year flow: NA cfs MGD.

2.5 Dilution Ratio: NA ;

2.6 Stream flow rate at time of sampling NA cfs MGD.

3. CHEMICAL CONSTITUENT Existing Permitted Conditions ; Existing conditions Proposed Permitted Conditions

Type of sample: grab (time of collection); composite (Number of samples per day)

(see instructions for analyses required)

Constituent	RAW WASTE (mg/l)	TREATED EFFLUENT Avg. (mg/l) Max.	UPSTREAM DOWNSTREAM SAMPLES
Ammonia Nitrogen (asN)	NTF	50.0	NA
Arsenic (Total)	NTF	NTF	NA
Barium	NTF	NTF	NA
Boron	NTF	NTF	NA
BOD ₅	> 1000	550	NA
Cadmium	NTF	NTF	NA
Carbon Chloroform Extract	NTF	NTF	NA
Chloride	NTF	NTF	NA
Chromium (total hexavalent)	NTF	NTF	NA
Chromium (total trivalent)	NTF	NTF	NA
Copper	NTF	NTF	NA
Cyanide (total)	NTF	<0.03	NA
Cyanide (readily released 150°F & pH 4.5)	NTF	NTF	NA
Dissolved Oxygen	NTF	NTF	NA
Fecal Coliform	NTF	NTF	NA

	RAW WASTE (mg / l)	TREATED EFFLUENT Avg. (mg / l) Max.	UPSTREAM (mg / l)	DOWNSTREAM SAMPLES (mg / l)
Fluoride	NTF	NTF	NA	NA
Hardness (as CaCO ₃)	NTF	NTF	NA	NA
Iron (total)	NTF	0.50	NA	NA
Lead	NTF	NTF	NA	NA
Manganese	NTF	NTF	NA	NA
MBAS	NTF	NTF	NA	NA
Mercury	NTF	NTF	NA	NA
Nickel	NTF	NTF	NA	NA
Nitrates (as N)	NTF	NTF	NA	NA
Oil & Grease (hexane solubles or equivalents)	300	<50	NA	NA
Organic Nitrogen (as N)	NTF	NTF	NA	NA
pH	<2.0	7-9	NA	NA
Phenols	NTF	NTF	NA	NA
Phosphorous (as P)	NTF	15.0	NA	NA
Radioactivity	NTF	NTF	NA	NA
Selenium	NTF	NTF	NA	NA
Silver	NTF	NTF	NA	NA
Sulfate	NTF	NTF	NA	NA
Suspended Solids	1000	175	NA	NA
Total Dissolved Solids	**	**	NA	NA
Zinc	NTF	NTF	NA	NA
Others				
** Treatment System not designed to remove TDS				

APPENDIX A

Narrative Description for C & F Packing Company, Inc.

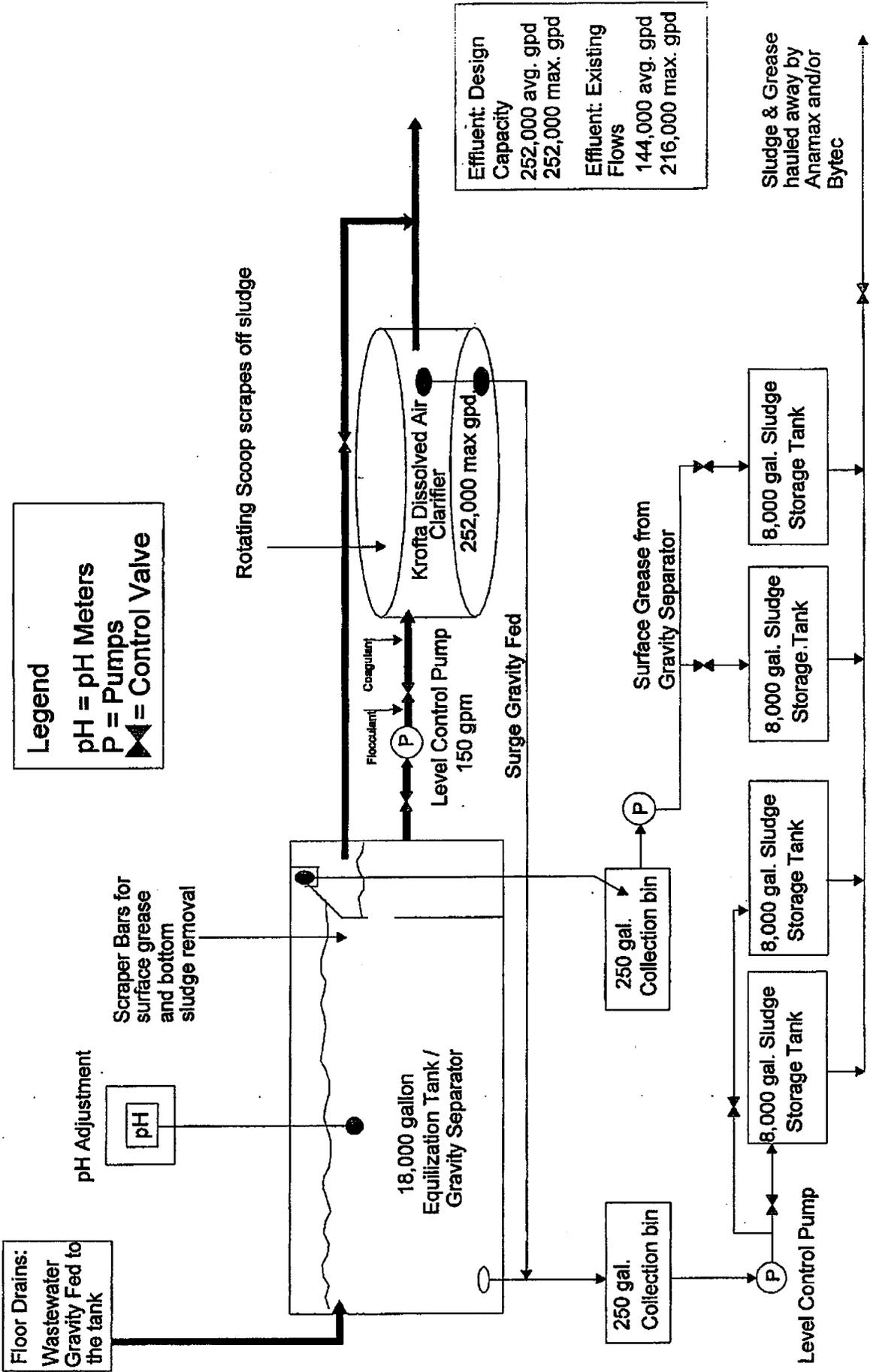
Wastewater from the cooked meat processes enter the pretreatment process through stainless steel floor drains. Strainer baskets in the floor drains collect the bulk of the solid material. The strainer baskets are emptied manually into 55 gallon barrels. These barrels are refrigerated until they are emptied and hauled off-site. The wastewater is gravity fed from the strainer baskets into an 18,000 Alloy Gravity Separator/Equalization Tank that is equipped with scraper bars and mixers where the pH will be adjusted to 7-9. The pH adjusted wastewater is then pumped to an 10 foot diameter Krofta DAF (dissolved air floatation) at a maximum rate of 150 gallons per minute. Coagulant and flocculent are added to the wastewater in the entrance pipe to the Krofta DAF in order to facilitate in the separation of fats, oils and greases from the wastewater. Sludge (grease) is scraped and removed from the top of the DAF and the bottom of the Gravity Separator. This sludge is gravity fed to a 250 gallon collection bin and then pumped to one of two 8000 gallon grease/sludge storage tanks. Additional oil/grease is scraped off the top of the Gravity Separator and fed to a second 250 gallon collection bin and then pumped to one of two additional 8000 gallon grease/oil storage tanks. There are a total of four 8000 gallon storage tanks. The sludge and oil are hauled away. The sludge grease is hauled away by Bytec which uses the sludge to manufacture fertilizer. The oil is hauled away by a rendering company, Anamax, which sells the rendered material to be used in the manufacturing of cosmetic products. See Appendix B for sludge composition.

The wastewater from the DAF is discharged to the sewer at a rate of approximately 100 gpm, 144,000 gpd, based on a 24 hour day (average); 150 gpm, 216,000 gpd based on a 24 hour day (maximum).

The system is designed to handle a maximum of 175 gpm max, 252,000 gpd, based on a 24 hour day. This maximum design flowrate is based on the Krofta DAF being the limiting piece of equipment in the system. The supplier-specified maximum design flowrate for the 10 foot-diameter Krofta DAF is 263 gpm. Based on our experience with Krofta, the true maximum design flowrate for the Krofta is about 66% of the supplier-specified design flowrate or, in this case, 175 gpm.

C & F Packing Company, Inc.
 515 Park Avenue
 Lake Villa, IL 60046

Wastewater Treatment System



APPENDIX B

12/15/2004 13:41

6083288204

BYTEC INC

PAGE 01



Environmental, Industrial & Food Analysis since 1950

Bytec,
Inc.
1037 - 8th Avenue West
Monroe, Wisconsin 53588

January 23, 2004

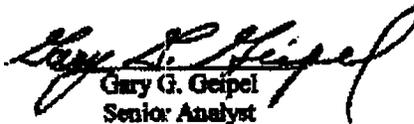
Project #04A0363

Attn: Gregg Weaver

SLUDGE ANALYSIS

Sample Identification: C&P 1-14-04 10:00S-F Lab No.: 04A0363-001

DNR Param #	Parameter Name	Wet Wgt. Result % wt.	Wet Wgt. Detect Limit	Sample Total Solids	Dry Wgt. Result % wt.	Dry Wgt. Detect Limit	Date Digested/ Extracted	Date Analyzed	Method #
00500	Total Solids	4.01	0.01	—	—	—	1/18/04	1/18/04	160 3
00825	Total Kjeldahl Nitrogen	0.153	0.002	4.01	3.82	0.05	1/18/04	1/18/04	251 3
00810	Ammonium Nitrogen	0.0126	0.001	4.01	0.314	0.026	1/18/04	1/18/04	350 2
00885	Total Phosphorus	0.063	0.001	4.01	1.57	0.02	1/18/04	1/18/04	365 3
00837	Total Potassium Chloride	0.0338	0.0001	4.01	0.845	0.002	1/18/04	1/18/04	SW846-1010B 300 0
	Biochemical Oxygen Demand	0.0478	0.0007	4.01	1.187	0.017	1/18/04	1/23/04	SM52 10B


Gary G. Geipel
Senior Analyst

6125 West National Avenue, P.O. Box 14513, Milwaukee, WI 53214
(414) 475-6700 FAX: (414) 475-7216 www.sflabs.com
Toll-Free: 800-300-6700

APPENDIX C



Kevin Wasag
 Laboratory Manager
 3158 S. Kolin Ave.
 Chicago IL 60623-4889
 Phone: 773-254-2406
 Extension 19
 FAX: 773-254-6661
 E-mail: kwasag@sciweb.com
 www.sciweb.com

MR. DENNIS OLSEN
 C & F PACKING COMPANY
 551 PARK AVENUE
 LAKE VILLA, IL 60046

Project Type: Wastewater Analysis
 Project Inception: 02-04-04
 Report Date: 02-13-04
 Project Number: 2004-020055
 Page Number: Page 1 of 3

IDENTIFICATION OF MATERIAL:

Eight (8) wastewater samples, taken by our personnel, identified as:

STATION 5 COMPOSITES

02/02-03/04 (2:15PM-1:15PM)
 02/03-04/04 (3:25PM-12:25PM)
 02/04-05/04 (1:20PM-12:20PM)
 02/05-06/04 (1:20PM-11:20AM)

STATION 5 GRABS

02-03-04 (3:35PM)
 02-04-04 (1:30PM)
 02-05-04 (1:30PM)
 02-06-04 (12:00PM)

PROCEDURE:

All analyses were performed in accordance with the EPA/IEPA approved test procedures as specified in 40 CFR, part 136, and certified to meet the NELAP requirements, unless otherwise noted. Scientific Control Labs, Inc., is an accredited laboratory for the analysis of potable water, wastewater, and hazardous waste (IEPA Cert. #100183), and an accredited laboratory for wastewater analysis (State of Washington Cert. #C165, State of Wisconsin DNR #998091930). This means we have a quality control program in effect and that this quality control program is monitored and reviewed annually by the certifying agencies. Sampling was conducted in accordance with the method specified in 40 CFR part 403. All samples were received in good condition unless otherwise noted.

RESULTS:

Concentration in ppm (mg/L)

	02-02 TO	02-03 TO	02-04 TO	02-05 TO	Daily Maximum
	02-03-04	02-04-04	02-05-04	02-06-04	Local Limits
STATION 5 COMPOSITES:					
BIOCHEMICAL OXYGEN DEMAND	545	355	307	630	3000
TOTAL SUSPENDED SOLIDS	92.0	74.0	134	138	1500
IRON	0.70	0.26	<0.20	<0.20	10.00
TOTAL PHOSPHORUS	21.0	6.50	13.5	9.50	150
CHEMICAL OXYGEN DEMAND	1420	646	616	1240	6000
TOTAL DISSOLVED SOLIDS	3040	2150	1850	2400	2500
AMMONIA NITROGEN	3.9	6.1	21.0	25.4	150
	3:35PM	1:30PM	1:30PM	12:00PM	Daily Maximum
STATION 5 GRABS:	02-03-04	02-04-04	02-05-04	02-06-04	Local Limits
FATS, OILS & GREASES	6.6	5.6	<5.0	<5.0	50.00
TOTAL CYANIDE	<0.03	<0.03	<0.03	<0.03	0.03
PH	6.3	7.0	7.0	7.3	6.0-9.0

Note: It is our policy to keep copies of reports for five years. The data is kept on file for up to five years. Samples (if applicable) are kept for three weeks. Samples that are hazardous will be returned to the client. If this policy poses a difficulty, please contact us to make other arrangements. If reproduced, our report, must be reproduced completely. Any unauthorized alteration of this report invalidates the content.



Order Number: 2004-020055
 Project Type: Wastewater Analysis
 Project Inception: 02-04-04
 Report Date: 02-13-04
 Page Number: Page 2 of 3

<u>METHOD OF ANALYSIS</u>	<u>Method</u>	<u>Date</u>	<u>Detection Limit</u>	<u>Analyst</u>
STATION 5 COMPOSITES, 02/02-03/04 (2:15PM-1:15PM)				
<i>Received on: 02-03-04 Collected on: 02-03-04</i>				
IRON	SM-3120	02-10-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	02-09-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	02-05-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	02-04-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	02-06-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	02-06-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	02-09-04	1.0mg/L	SW

STATION 5 GRAB, 02-03-04 (3:35PM)

<i>Received on: 02-03-04 Collected on: 02-03-04</i>				
FATS, OILS & GREASES	SM-5520-B	02-05-04	5.0mg/L	ID
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	02-04-04	0.05mg/L	AT
PH	SM-4500H+B	02-03-04	0.1	CG

STATION 5 COMPOSITES, 02/03-04/04 (3:25PM-12:25PM)

<i>Received on: 02-04-04 Collected on: 02-04-04</i>				
IRON	SM-3120	02-10-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	02-09-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	02-05-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	02-05-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	02-06-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	02-06-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	02-11-04	1.0mg/L	SW

STATION 5 GRAB, 02-04-04 (1:30PM)

<i>Received on: 02-04-04 Collected on: 02-04-04</i>				
FATS, OILS & GREASES	SM-5520-B	02-05-04	5.0mg/L	ID
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	02-05-04	0.05mg/L	AT
PH	SM-4500H+B	02-04-04	0.1	CG

STATION 5 COMPOSITES, 02/04-05/04 (1:20PM-12:20PM)

<i>Received on: 02-05-04 Collected on: 02-05-04</i>				
IRON	SM-3120	02-10-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	02-11-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	02-09-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	02-09-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	02-06-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	02-06-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	02-11-04	1.0mg/L	SW

STATION 5 GRAB, 02-05-04 (1:30PM)

<i>Received on: 02-05-04 Collected on: 02-05-04</i>				
FATS, OILS & GREASES	SM-5520-B	02-09-04	5.0mg/L	ID
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	02-11-04	0.05mg/L	AT
PH	SM-4500H+B	02-05-04	0.1	CG

PH was analyzed immediately upon receipt at the laboratory.



Order Number: 2004-020055
 Project Type: Wastewater Analysis
 Project Inception: 02-04-04
 Report Date: 02-13-04
 Page Number: Page 3 of 3

<u>METHOD OF ANALYSIS</u>	<u>Method</u>	<u>Date</u>	<u>Detection Limit</u>	<u>Analyst</u>
STATION 5 COMPOSITES, 02/05-06/04 (1:20PM-11:20AM)				
<i>Received on: 02-06-04</i>		<i>Collected on: 02-06-04</i>		
IRON	SM-3120	02-10-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	02-11-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	02-09-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	02-09-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	02-11-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	02-06-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	02-11-04	1.0mg/L	SW

STATION 5 GRAB, 02-06-04 (12:00PM)

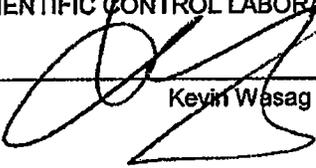
<i>Received on: 02-06-04</i>		<i>Collected on: 02-06-04</i>		
FATS, OILS & GREASES	SM-5520-B	02-11-04	5.0mg/L	ID
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	02-11-04	0.05mg/L	AT
PH	SM-4500H+B	02-06-04	0.1	CG

PH was analyzed immediately upon receipt at the laboratory.

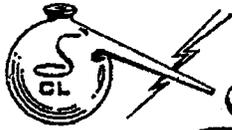
Respectfully submitted,

SCIENTIFIC CONTROL LABORATORIES, INC.

By


Kevin Wasag

KW: av



Scientific
CONTROL LABORATORIES, INC.
 TESTING — CONSULTING

Kevin Wasag
 Laboratory Manager
 3158 S. Kolin Ave.
 Chicago IL 60623-4889
 Phone: 773-254-2406
 Extension 19
 FAX: 773-254-6661
 E-mail: kwasag@schweb.com
www.schweb.com

MR. DENNIS OLSEN
 C & F PACKING COMPANY
 551 PARK AVENUE
 LAKE VILLA, IL 60046

Project Type: Wastewater Analysis
 Project Inception: 06-15-04
 Report Date: 06-28-04
 Project Number: 2004-060238
 Page Number: Page 1 of 3

IDENTIFICATION OF MATERIAL:

Eight (8) wastewater samples, taken by our personnel, identified as:

STATION 1A COMPOSITES

06/14-15/04 (11:00AM-10:00AM)
 06/15-16/04 (11:00AM-10:00AM)
 06/16-17/04 (10:40AM-9:40AM)
 06/17-18/04 (10:00AM-9:00AM)

STATION 1A GRABS

06-15-04 (10:45AM)
 06-16-04 (10:30AM)
 06-17-04 (10:50AM)
 06-18-04 (10:40AM)

PROCEDURE:

All analyses were performed in accordance with the EPA/IEPA approved test procedures as specified in 40 CFR, part 136, and certified to meet the NELAP requirements, unless otherwise noted. Scientific Control Labs, Inc., is an accredited laboratory for the analysis of potable water, wastewater, and hazardous waste (IEPA Cert. #100183), and an accredited laboratory for wastewater analysis (State of Washington Cert. #C165, State of Wisconsin DNR #998091930). This means we have a quality control program in effect and that this quality control program is monitored and reviewed annually by the certifying agencies. Sampling was conducted in accordance with the method specified in 40 CFR part 403. All samples were received in good condition unless otherwise noted.

RESULTS:

Concentration in ppm (mg/L)

<u>STATION 1A COMPOSITES:</u>	<u>06-14 TO</u>	<u>06-15 TO</u>	<u>06-16 TO</u>	<u>06-17 TO</u>	Daily Maximum
	<u>06-15-04</u>	<u>06-16-04</u>	<u>06-17-04</u>	<u>06-18-04</u>	<u>Local Limits</u>
IRON	0.83	0.80	0.58	0.56	10.00
BIOCHEMICAL OXYGEN DEMAND	960	500	575	535	3000
TOTAL SUSPENDED SOLIDS	134	174	288	388	1500
TOTAL DISSOLVED SOLIDS	3480	2010	3430	3690	2500
CHEMICAL OXYGEN DEMAND	1480	739	924	1110	6000
AMMONIA NITROGEN	43.6	76.2	116	132	150
TOTAL PHOSPHORUS	14.2	10.4	19.0	21.8	150

<u>STATION 1A GRABS:</u>	<u>06-15-04</u>	<u>06-16-04</u>	<u>06-17-04</u>	<u>06-18-04</u>	Daily Maximum
	<u>06-15-04</u>	<u>06-16-04</u>	<u>06-17-04</u>	<u>06-18-04</u>	<u>Local Limits</u>
FATS, OILS & GREASES	<5.0	<5.0	8.8	<5.0	50.00
TOTAL CYANIDE	<0.025	<0.025	<0.025	<0.025	0.03
PH	6.2	7.1	7.2	8.0	6.0-9.0

Note: It is our policy to keep copies of reports for five years. The data is kept on file for up to five years. Samples (if applicable) are kept for three weeks. Samples that are hazardous will be returned to the client. If this policy poses a difficulty, please contact us to make other arrangements. If reproduced, our report, must be reproduced completely. Any unauthorized alteration of this report invalidates the content.



Order Number: 2004-060238
Project Type: Wastewater Analysis
Project Inception: 06-15-04
Report Date: 06-28-04
Page Number: Page 2 of 3

<u>METHOD OF ANALYSIS</u>	<u>Method</u>	<u>Date</u>	<u>Detection Limit</u>	<u>Analyst</u>
STATION 1A COMPOSITES, 06/14-15/04 (11:00AM-10:00AM)				
<i>Received on: 06-15-04 Collected on: 06-15-04</i>				
IRON	SM-3120	06-21-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	06-20-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	06-17-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	06-17-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	06-21-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	06-17-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	06-17-04	1.0mg/L	AT

STATION 1A GRAB, 06-15-04 (10:45AM)				
<i>Received on: 06-15-04 Collected on: 06-15-04</i>				
FATS, OILS & GREASES	SM-5520-B	06-17-04	5.0mg/L	JC
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	06-17-04	0.025mg/L	AT
PH	SM-4500H+B	06-15-04	0.1	CG

STATION 1A COMPOSITES, 06/15-16/04 (11:00AM-10:00AM)				
<i>Received on: 06-16-04 Collected on: 06-16-04</i>				
IRON	SM-3120	06-21-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	06-21-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	06-17-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	06-17-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	06-21-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	06-17-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	06-17-04	1.0mg/L	AT

STATION 1A GRAB, 06-16-04 (10:30AM)				
<i>Received on: 06-16-04 Collected on: 06-16-04</i>				
FATS, OILS & GREASES	SM-5520-B	06-22-04	5.0mg/L	JC
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	06-17-04	0.025mg/L	AT
PH	SM-4500H+B	06-16-04	0.1	CG

STATION 1A COMPOSITES, 06/16-17/04 (10:40AM-9:40AM)				
<i>Received on: 06-17-04 Collected on: 06-17-04</i>				
IRON	SM-3120	06-21-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	06-22-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	06-21-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	06-21-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	06-21-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	06-24-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	06-18-04	1.0mg/L	AT

STATION 1A GRAB, 06-17-04 (10:50AM)				
<i>Received on: 06-17-04 Collected on: 06-17-04</i>				
FATS, OILS & GREASES	SM-5520-B	06-22-04	5.0mg/L	JC
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	06-18-04	0.025mg/L	AT
PH	SM-4500H+B	06-17-04	0.1	CG

PH was analyzed immediately upon receipt at the laboratory.



Order Number: 2004-060238
 Project Type: Wastewater Analysis
 Project Inception: 06-15-04
 Report Date: 06-28-04
 Page Number: Page 3 of 3

<u>METHOD OF ANALYSIS</u>	<u>Method</u>	<u>Date</u>	<u>Detection Limit</u>	<u>Analyst</u>
STATION 1A COMPOSITES, 06/17-18/04 (10:00AM-9:00AM)				
<i>Received on: 06-18-04</i>		<i>Collected on: 06-18-04</i>		
IRON	SM-3120	06-23-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	06-23-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	06-21-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	06-21-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	06-23-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	06-24-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	06-25-04	1.0mg/L	AT

STATION 1A GRAB, 06-18-04 (10:40AM)*Received on: 06-18-04**Collected on: 06-18-04*

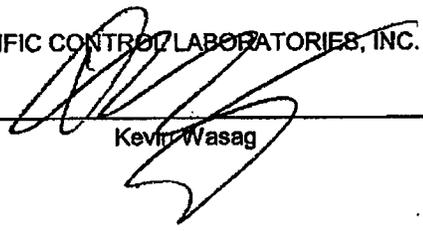
FATS, OILS & GREASES	SM-5520-B	06-22-04	5.0mg/L	JC
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	06-21-04	0.025mg/L	AT
PH	SM-4500H+B	06-18-04	0.1	CG

PH was analyzed immediately upon receipt at the laboratory.

Respectfully submitted,

SCIENTIFIC CONTROL LABORATORIES, INC.

By


 Kevin Wasag

KW: av

APPENDIX D

09/17/2001 12:08

952-492-3100

ALLOY

PAGE 01/02



Evolving to meet YOUR needs....

ALLOY HARDFACING & ENGINEERING CO., INC.
 90425 JOHNSON MEMORIAL DRIVE
 JORDAN, MN 55352

800-328-8408
952-492-5500
952-492-3100 FAX

17 September 2001

Fax: 773-254-6661

Fax: 2 pages

Scientific Control Laboratories
 3158 South Kolin Avenue
 Chicago, IL 60623

Attn: Joanne Kiepora

cc: Dennis Olson - C & F Packing

Re: Specifications on C & F Packing Gravity Separator Alloy Job #000702

Joanne:

Following please find Alloy's approval drawing which give specifications on the unit including:

- Water inlet location and diameter
- Water outlet locations and diameter
- Solids outlet via 9" diameter "U" trough screw conveyor
- Fats outlet via 9" diameter "U" trough screw conveyor

Regarding water flow, Alloy recommends retention time of (1) hour; however, many customers use 40 to 45 minutes retention time and still get adequate results.

As a result the rated capacity is as follows:

- 1-hour retention - 18,000 gallons per hour or 300 gallons per minute
- 45-minute retention - 24,000 gallons per hour or 400 gallons per minute

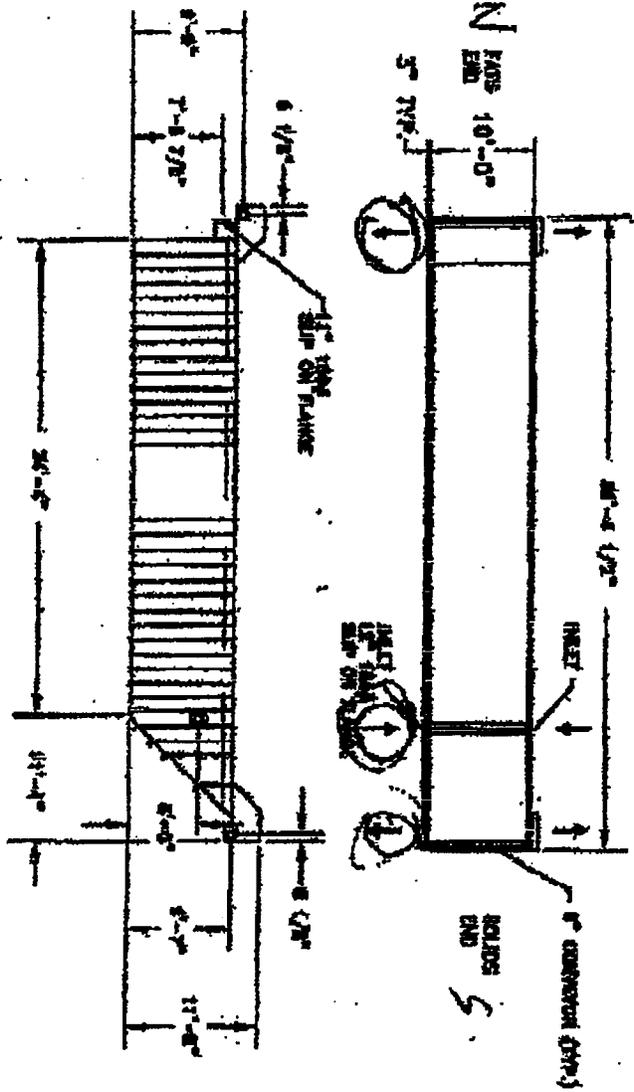
If you have any questions or comments or need additional information, please feel free to contact us.

Sincerely,

Paul Rothenberger

Paul Rothenberger
 Applications Engineer

PR:jk
 Enclosure



CUSTOMER - C&F Packing
 JOB # 000702/703
 DATE - 04/10/00 M/15/00
 GALLONS - 12,000
 CUSTOMER SPECS

- PATS DISCHARGE
 - RIGHT HAND
 - LEFT HAND
- SOLIDS DISCHARGE
 - RIGHT HAND
 - LEFT HAND
- INLET PIPE
 - RIGHT HAND
 - LEFT HAND

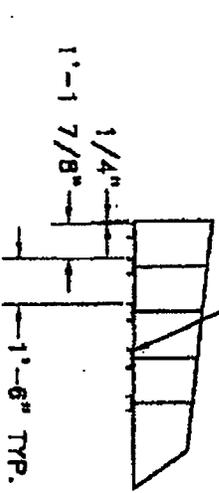
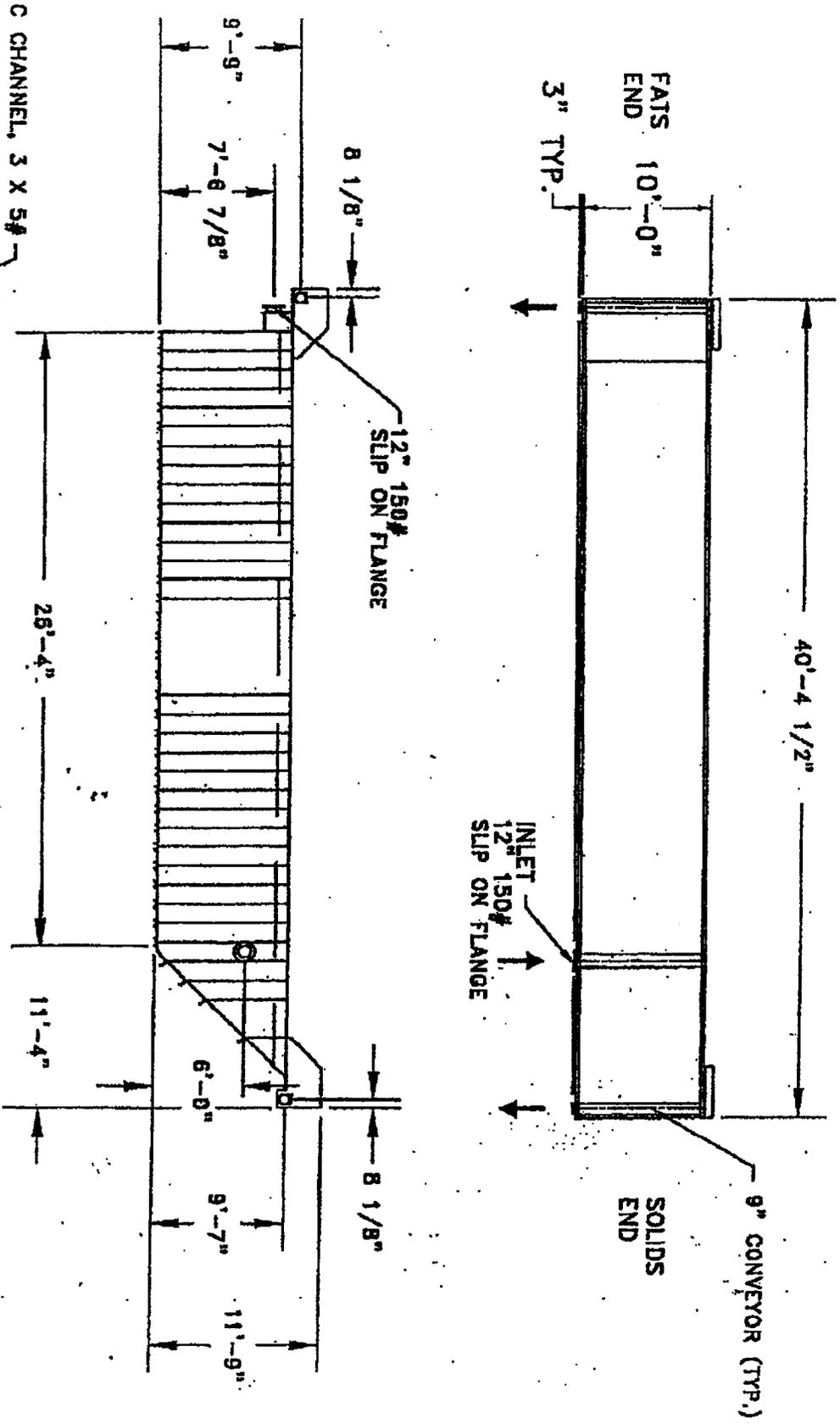
INLET PIPE SIZE: 12" ϕ
 OUTLET PIPE SIZE: 12" ϕ
 SHIPPING DIMENSIONS:
 SHIPPING WEIGHT: 18,200 #
 ALLOY STANDARD IS A
 9" SCREW CONVEYOR

ALERTON MEAT

AUTHORIZED SIGNATURE

STARTER PANEL OPTION	YES	NO
CONTROL VOLTAGE	230V	460V
ALERTON CONTROLS	YES	NO

REFERENCES	0002702
REVISIONS	
DATE	
BY	
DESCRIPTION	
APPROVED	
SCALE	AS SHOWN
SHEET	2 OF 2



REFERENCES

THE DESIGNER ASSURES
 INFORMATION PROVIDED
 TO ALLOY HARDWARE &
 ENGINEERING CO., INC. IS
 ACCURATE AND COMPLETE
 FOR THE PURPOSES OF THE
 DESIGN. THE DESIGNER
 ASSUMES NO LIABILITY FOR
 THE ALLOY HARDWARE &
 ENGINEERING CO., INC. ANY
 ERRORS OR OMISSIONS IN
 THIS DRAWING.

DESIGNER	DATE	4/03
CHECKER	DATE	
DRWG. MGR.	DATE	
TOLERANCES UNLESS NOTED OTHERWISE		
1/16"	FRACTIONS & 1/32"	ANGLES
1/32"	ANGLES	ANGLES
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CONFIRM FAX



Evolving to meet YOUR needs....

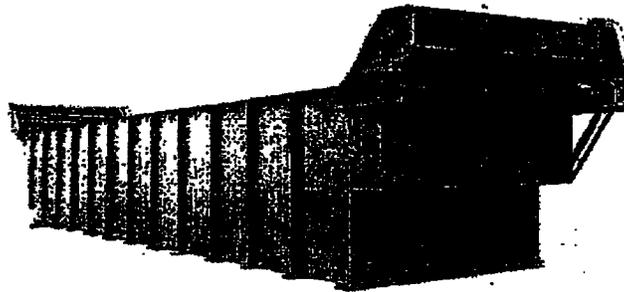
ALLOY HARDFACING & ENGINEERING CO., INC.
90425 JOHNSON MEMORIAL DRIVE
JORDAN, MN 55352

800-328-8408
952-492-5569
952-492-3100 FAX

QUOTATION

C & F PACKING COMPANY, INC.
P.O. Box 667
Elk Grove Village, IL 60009-0667
Attn: Dennis Olson
Fax: 847-228-7050
Phone: 847-228-6300

FOR



ALLOY-design GRAVITY SEPARATOR
MODEL #18080940

Quote#: 00-222R2

DATE: 22 August, 2000

Paul Rothenberger (d)
BY: Paul Rothenberger
Applications Engineer

TERMS:
35% Deposit with Order
55% Net 10 days after shipment
Balance Net

Accepted By: _____

FOB Alloy

Date: ___/___/___



ALLOY HARDFACING & ENGINEERING CO. INC.

20425 JOHNSON MEMORIAL DRIVE JORDAN MN 55352

PHONE: 1-800-328-8408

FAX: 952-492-3100

QUOTATION NUMBER

00-222R2

TO: C & F PACKING CO., INC. – Elk Grove Village, IL
ATTN: Dennis Olson

Date: 22 August, 2000
Page: 1

QUANTITY	ITEM #/DESCRIPTION	INVESTMENT	HP
	<p>ALLOY-design 18,000 Gallon Separator Model #180940</p> <p>A. <u>CAPACITY:</u> 18,000 Gallons</p> <p>B. <u>DIMENSIONS:</u></p> <ul style="list-style-type: none"> ◆ Water Depth ◆ Inside Width ◆ Overall Length ◆ Overall Width ◆ Overall Height 7.80 <p>C. <u>TANK ROOFER:</u> constructed of 7 ga. stainless steel the roof panels are stiffened with structural members to maintain a 1% slope for bottom of incline to be drainage of oils.</p> <p>D. <u>BASE:</u> 2" x 6" wood slats, mounted to the base of separator with 1/2" on wood slats rest on wheels for skid to</p> <p>E. <u>MAIN DRIVE:</u> 1 1/2 HP, TEFC motor with worm gear speed reducer driving head shaft and slave driving solids collecting auger. Head shaft is mounted in ball bearing take-up frames.</p> <p>F. <u>SEPARATE BEACH DRIVE AND DRIVE:</u> Special ALLOY-design feature for grease removal, being accomplished by a second beach drag on top. The beach skimmer slats pick up the floating fats and transfer same to the 9" discharge D-trough via a separate drive. None of the beach chain slat assemblies "wash over" and/or push the floating product into the effluent.</p> <p>G. <u>BEACH DRIVE:</u> 1/3 HP, TEFC motor with worm gear speed reducer driving head shaft and slave driving fats collecting auger. Head shaft is mounted in ball bearing take-up frames.</p>		

EVOLVING TO MEET YOUR NEEDS....

QUOTATION SUBJECT TO TERMS AND CONDITIONS LISTED ON REVERSE SIDE

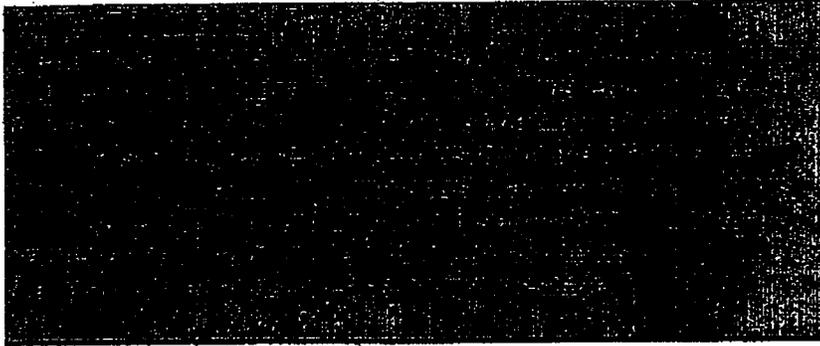
00-222R2

C & F PACKING CO., INC. -- Elk Grove Village, IL
Dennis Olson

22 August, 2000
2

- H. INLET AND OUTLET: - per your requirements; please specify size and orientation when ordering.
- I. INSIDE OF TANK: - epoxy coating on inside of tank.
- J. OWNER/OPERATOR MANUALS: (2) sets included with each Alloy Gravity Separator.
- K. APPROXIMATE SHIPPING WEIGHT: 18,200 lbs.

Delivery lead-time commences upon receipt of purchase order, deposit and signed orientation drawing.



**STARTER CONTROL PANEL OPTIONS
FOR GRAVITY SEPARATOR**

**For units *WITH* aeration up to 25,000 Gallons
(Includes Items A-D + E-G)**

- A. (1) Aeration motor starter, 3-phase, with overload, 230 Volt
- B. (1) Motor fuse block, 3-pole, with fuses.
- C. Start/Stop Control Aeration Motor.

00-222R2

C & F PACKING CO., INC. - Elk Grove Village, IL
Dennis Olson

22 August, 2000
3

WATER AIR AERATION AND RECYCLE SYSTEM

For aerating and recycling Gravity Separator effluent up to 300 GPM into inlet of unit. System designed for installation on a 18,000 gallon ALLOY-design Gravity Separator using 100% recycle.

- A. (1) water pump(s) for recycling up to 300 GPM, each, with mechanical shaft seal, complete with 25 HP, 3 Phase, 230/460 Volt, TEFC motor, base, coupling and coupling guard.
- B. (3) Air Injection PUMPS and control assembly, to include all hand valves, air regulators, air flow meters and fittings; preassembled at factory.
- C. Black iron recirculation water inlet pipe and fitting for field installation on discharge end of ALLOY-design Gravity Separator.
- D. PVC Air-Water distribution pipe assembly with NPT inlet fitting for field installation on inlet end of ALLOY-design Gravity Separator.
- E. (2) Rubber squeegees complete with mild steel backer.
- F. (2) Sets owner manuals.



TOTAL INVESTMENT
SYSTEM DISCOUNT
GRAND TOTAL INVESTMENT

**SUPRACELL Circular DAF
Dissolved Air Flotation Clarifier**

Automatic Level Control

An automatic level control system (manual weir is optional) constantly monitors flow fluctuations and keeps the level in the tank accurate to 1/8" to ensure consistent and precise sludge removal. The automatic level control system consists of a pressure transducer mounted on the tank to monitor level fluctuations, a process control unit, and a level control valve mounted on the effluent line of the tank to modulate flow as needed to maintain the preset level.

TABLE OF CAPACITIES

SIZE Diameter (feet)	CAPACITY (GPM)
4	30
6	65
8	148
10	263
12	394
15	525
18	789
20	961
22	1160
24	1340
27	1695
30	2090
33	2580
36	3125
40	3840
44	4630
49	5650
55	7290
62	9265
70	11800

Post-It® Fax Note: 7671	Date 10/17	# of pages ▶
To: JOSE LARK	From: TOM LAWRENCE	
Co./Dept.	Co.	
Phone #	Phone #	
Fax # 773-254-1666	Fax #	

773

USE STOPS ADVANTAGES

There is only 18-22 inches of water in the clarifier; therefore the unit has a very low floor loading. Typically, units will weigh ~160 lbs / sf or less.

The shallow tank design provides for easy operation tank inspection and cleaning.

A viewing window is mounted on the side of the tank for observation of the flotation process and facilitates the optimization of chemical dosing (if necessary).

The shallow, open tank design also allows for utilization of the unit on a wide variety of applications. Heavy oil and grease applications or heavy sand / grit applications are well suited to the design since there are few obstructions within the tank to accumulate solids.

A bottom scraper cleans the unit of any sediment debris that is then automatically purged.

All of the inlet and outlet connections are at the bottom of the unit, allowing the unit to be installed in an elevated position.

Elevation eliminates the need for an additional pumping stage when it is necessary to drain the clarified water or flocced sludge.

The spiral scoop mechanism is designed for precise sludge removal by biting into only the sludge layer above the clarified water level. This increases floated sludge consistency, benefiting downstream sludge handling equipment by reducing flow and chemical consumption on the press.

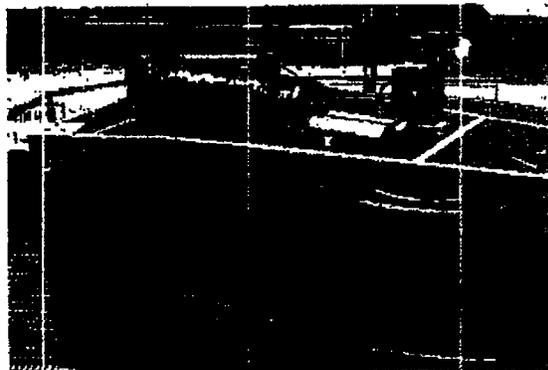


EXHIBIT C

(page 1 of 2)

Illinois Environmental Protection Agency
 Permit Section, Division of Water Pollution Control
 P.O. Box 19276
 Springfield, IL 62764-9276
Application For Permit Or Construction Approval
 WFC-PS-1

For IEPA Use:

Name and Location: C & F PACKING COMPANY, INC., 515 PARK AVENUE, LAKE VILLA, IL 60046

Name of Project: C & F Packing Company Wastewater Source & Pretreatment Equipment

Municipality or Township: LAKE VILLA County: LAKE

2. Brief Description of Project: Installation of a Wastewater Source for the Processing of Cooked Meats to Produce Pizza Toppings and Soup Bases and the Supplemental Pretreatment Equipment, including a Gravity Separator with DAF.

3. Documents Being Submitted: If the project involves any of the items listed below, submit the corresponding schedule, and check the appropriate spaces.

Project				
Private Sewer Connection/Extension	A/B	<input checked="" type="checkbox"/>	Spray Irrigation	H
Sewer Extension Construct Only	C	<input type="checkbox"/>	Septic Tanks	I
Sewage Treatment Works	D	<input type="checkbox"/>	Industrial Treatment Pretreatment	J
Excess Flow Treatment	E	<input type="checkbox"/>	Waste Characteristics	N
Lift Station/Force Main	F	<input type="checkbox"/>	Erosion Control	P
Sludge Disposal	G	<input checked="" type="checkbox"/>	Trust Disclosure	T

Plans: - Title _____ Number of Pages: _____

Specifications: Title _____ Number of Books/Pages: _____

Other Documents (Please Specify) _____

4. Land Trust: Is the project identified in item number 1 herein, for which a permit is requested, to be constructed on land which is the subject of a trust? Yes No
 If yes, Schedule T (Trust Disclosure) must be completed and item number 7.1.1 must be signed by a beneficiary, trustee, or trust officer.

5. This is an Application for (Check Appropriate Line):

- A. Joint Construction And Operating Permit
- B. Authorization to Construction (See Instructions) NPDES Permit No. IL00 _____ Issue Date _____
- C. Construct Only Permit (Does Not Include Operations)
- D. Operate Only Permit (Does Not Include Construction)

6. Certifications and Approval:

6.1 Certificate by Design Engineer (When required; refer to instructions)

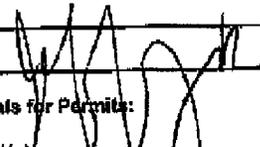
I hereby certify that I am familiar with the information contained in this application, including the attached schedules indicated above, and that to the best of my knowledge and belief such information is true, complete, and accurate. The plans and specifications (specifications other than Standard Specifications or local specifications on file with this Agency) as described above were prepared by me or under my direction.

Engineer JEFFREY ZAK 082-052241
 Name Registration Number Seal

Firm: SCIENTIFIC CONTROL LABORATORIES, INC.

Address: 3158 SOUTH KOLIN AVENUE

CHICAGO, IL 60623 Phone Number: (773) 254-2406

Signature X 

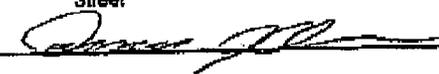
7. Certifications and Approvals for Permits:

7.1 Certificate by Applicant(s)

I/We hereby certify that I/we have read and thoroughly understand the conditions and requirements of this Application, and am/are authorized to sign this application in accordance with the Rules and Regulations of the Illinois Pollution Control Board. I/We hereby agree to conform with the Standard Conditions and with any other Special Conditions made part of this Permit.

7.1.1 Name of Applicant For Permit to Construct C & F PACKING COMPANY, INC.

515 PARK AVENUE LAKE VILLA IL 60046
 Street City State Zip Code

Signature X  DENNIS OLSON 847-228-6300
 Printed Name Phone Number

Title CO-OWNER Organization C & F PACKING COMPANY, INC.

(page 2 of 2)

7.1.2 Name Of Applicant For Permit To Own and Operate P-F Parking Co. Inc
515 Park Avenue Lake Villa IL 60046
Street City State Zip Code

Signature X [Signature] Dennis J. Olson 847-228-6300
Printed Name Phone Number

Title Co-Owner

7.2 Attested (Required When Applicant is a Unit of Government)
Signature X _____ Date _____ Title _____
(City Clerk, Village Clerk, Sanitary Clerk, Etc.)

7.3 Applicants from non-governmental applicants which are not signed by the owner, must be signed by a principal executive officer of at least the level of vice president, or a duly authorized representative.

7.4 Certificate By Intermediate Sewer Owner
I hereby certify that (Please check one):

- 1. The sewers to which this project will be tributary have adequate reserve capacity to transport the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
- 2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

Name and location of sewer system to which this project will be tributary: N 4739th / E 606134

Sewer System Owner Village of Lake Villa
65 Cedar Street Lake Villa Illinois 60046
Street City State Zip Code

Signature X [Signature] Date 09/20/01 Title Supt. Water & Sewer

7.4.1 Additional Certificate By Intermediate Sewer Owner
I hereby certify that (Please check one):

- 1. The sewers to which this project will be tributary have adequate reserve capacity to transport the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
- 2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

Name and location of sewer system to which this project will be tributary: Northwest Interceptor Sewer

Sewer System Owner Lake County Public Works
650 Winchester Rd Libertyville IL 60048
Street City State Zip Code

Signature X [Signature] Date 9-25-01 Title Supt.

7.5 Certificate By Waste Treatment Works Owner
I hereby certify that (Please check one):

- 1. The waste treatment plant to which this project will be tributary has adequate reserve capacity to treat the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
- 2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

I also certify that the industrial waste discharges described in the application is capable of being treated by the treatment works.
Name and location of waste treatment works to which this project is tributary: NWRWRF

Treatment Works Owner Village of Fox Lake
200 Industrial Drive Fox Lake, Illinois 60020
Street City State Zip Code

Signature X [Signature] Date October 11, 2001 Title Supervisor

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

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

Log # _____

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, Illinois 62794-9276

SCHEDULE A PRIVATE SEWER CONNECTION(S) OR SCHEDULE B SEWER EXTENSION(S)
(Please Circle One or Both)

1. **NAME OF PROJECT:** C & F Packing Company Wastewater Source & Pretreatment Equipment
2. **TYPE OF SERVICE(S):** Residential _____ ; Commercial _____ ; Light Industrial (Domestic Waste Only) _____ ;
Manufacturing X ; Recreational _____ ; Other _____
3. **NATURE OF PROJECT:** Project consists of: a sewer connection X ; a trunk sewer _____ ; a replacement sewer _____ ; a relief sewer _____ ; an interceptor sewer _____ ; a new sanitary sewer _____
4. **PROJECT LOCATION, SERVICE AREA AND POPULATION:** Submit map(s) of the service area that includes the following:
 - 4.1 The proposed sewer layout and project location.
Township Lake Villa Section 4 Range 10
 - 4.2 Residential and/or non-residential areas and their associated waste loads to be immediately served by the sewers of this project.
 - 4.3 Potential residential and/or non-residential areas and their associated loads must be included in the overall design of the sewers of this project.
5. **FACILITIES PLANNING AREA:** This project is y is not _____ being constructed entirely within the Facilities Planning Area (FPA) boundaries. If not, please explain. _____
6. **TYPE OF DEVELOPMENT:** The following design criteria should be used in estimating the population equivalent (P.E.) of a residential building:

Efficiency or Studio Apartment	= 1	P.E.
1 Bedroom Apartment	= 1.5	P.E.
2 Bedroom Apartment	= 3	P.E.
3 Bedroom Apartment	= 3	P.E.
Single Family Dwelling	= 3.5	P.E.
Mobile Home	= 2.25	P.E.

Commonly used quantities of sewage flows from miscellaneous type facilities are listed in Appendix B, Table No. 2 of the Illinois Recommended Standards for Sewage Works.

- 6.1 **RESIDENTIAL BUILDINGS:** Number of building(s) _____ ; Number of single family dwelling building(s) _____ ;
Number of multiple dwelling buildings* _____ ; Estimated total population _____ P.E.
* Please provide an itemized list of the number of bedrooms per unit per building.
- 6.2 **NON-RESIDENTIAL BUILDINGS:** Describe use of building(s) Manufacturing Building for Processing Cooked Meats to Produce Pizza Toppings.

Principal product(s) or activities

SEE ABOVENumber of building(s) to be served under this Permit 1

Estimated number of employees 150; Estimated number of occupants (transients) _____. Estimated population equivalent (one population equivalent is 100 gallons of sewage per day, containing 0.17 pounds of BOD₅ and 0.20 pounds of suspended solids). Flow P.E. 30; BOD P.E. 30; Suspended Solids P.E. 30.

- 6.3 Total loading for this project Design Average Flow _____ GPD; Design Max. Flow _____ GPD _____ BOD P.E. _____ Suspended Solids P.E. _____

Commencing January 1, 1991, Section 12.2 of the Environmental Protection Act (Ill. Rev. Stat. 1987, Ch. 111 1/2, Par. 1016.1, as amended by P.A. 86-1362) requires the Agency to collect a fee for certain applications for the installation of sanitary sewer connections and extension. There are no permit fees for other improvements to sewage treatment systems and only certain sewer projects will be affected.

Except for the conditions listed below, the following fee schedule shall apply:

Fee Dollars	Population Equivalents
50	1
200	2 - 20
400	21 - 100
600	101 - 499
1200	500 or more

Please send the appropriate fee; certified or cashier's check made out to: "Treasurer, State of Illinois, Environmental Protection Permit and Inspection Fund" with the applicant's Federal Employee Identification Number (FEIN) appearing on the face of the check and submit along with this schedule. Any fee remitted to the Agency shall not be refunded at any time or for any reason, either in whole or in part.

The Sewer Permit fee does not apply to:

- a) Any Department, Agency or Unit of State Government
- b) Any unit of local government where all of the following conditions are met:
 - 1) The cost of the installation or extension is paid wholly from monies of the unit of local government, state grants or loans, federal grants or loans, or any combination thereof.
 - 2) The unit of local government is not given monies, reimbursed or paid, either in whole or in part, by another person (except for State grants or loans or federal grants or loans; and
 - 3) I/we

(Signature for Unit of Government)

hereby certify that subsections (b)(1) and (b)(2) have been met.

- c) A sewer permit fee is not required for those sewer connections or sewer extension to serve only non-sewage waste. Should a portion of the waste flow be attributable to a sewage source(s), the fee shall be based on that portion. Sewage is defined as water-carried human and related wastes from any source.

- 6.4 Non domestic liquid waste, is is not _____ produced inside the building(s). If liquid wastes other than domestic are produced, submit Schedule N.

7. **DEVIATION FROM DESIGN CRITERIA:** The design criteria for sewers are contained in the "Illinois Recommended Standards for Sewage Works", Current Edition. This submittal does _____ does not _____ include deviations from said criteria. If deviations are included, justification for said deviations must be attached.

- 7.1 Will "Standard Specifications for Water and Sewer Main Construction in Illinois", Current Edition, govern the construction of this system? YES NO _____. If "NO" specifications must be furnished for the construction of the sewer.

8. INFILTRATION/EXFILTRATION LIMITS: NA gallons per inch diameter of sewer pipe per mile per day.

9. SUMMARY OF SEWERS: Submit plan and profile drawings.

Sanitary* Process*

	Connections		Extensions		
	8"	6"			
Pipe size - inches	8"	6"			
Total Length - feet	530'	231'			
Min. slope used - %	0.50%	1.50%			
Max. slope used - %	3.37%	6.00%			
Min. cover over sewers - feet	6.95'	5.75'			
Pipe Material & Specs.	PVC SDR-35	PVC SDR-35			
Joint Material & Specs.	Elastic Seal 32.2	ASTM D3212			
Total Manholes	4				
Max. Distance Between Manholes	180'				
Bedding Class for Rigid Pipe (A, B, or C per ASTM C12)	A	A			
Bedding Class for Flexible Pipe (I, II, or III per ASTM 2321)	NA	NA			

*** Sewers connect before Main Sewer**

Is the project located in a flood plain? YES _____ NO X If it is, contact the Illinois Department of Transportation, Division of Water Resources Management for further permit requirements.

10. EROSION CONTROL: The design criteria for Erosion Control are contained in the "Illinois Environmental Protection Agency - Standard and Specifications for Soil Erosion and Sedimentation Control" Current Edition. This submittal does _____ does not X include deviation from said criteria. If deviations are included, justification for said criteria must be attached. (See instructions for Schedule P to determine if this form must be submitted.)

11. EXISTING SEWER SYSTEM:

11.1 Size and location of the existing sanitary sewer to which this project will connect 12" Sanitary - Manhole #1 (N4739.a6 / E 606134) 144' East of Center Line Route 83 on Park Avenue, Lake Villa

Tributary to Interceptors _____

11.2 Tributary to Pump Station(s) NA

Adequate Reserve Pumping Capacity? YES _____ NO _____

12. WATER SUPPLY PROTECTION: The horizontal and/or vertical separation between sanitary sewers and water mains is in accordance with "Standard Specifications for Water and Sewer Main Construction in Illinois," Current Edition.
YES X NO _____

Describe the precautionary features against contamination NA

Proximity to wells, reservoirs, and other water sources; indicate distance and precautions taken NA

Minimum distance _____ feet; Not applicable X

13. PIPE TESTING:

Is infiltration test included in specifications? YES X NO _____

or, exfiltration test included in specifications? YES _____
or air testing included in specifications? YES _____

NO _____
NO _____

14. FLEXIBLE PIPE TESTING:

is deflection test included in specifications in accordance with the Illinois Recommended Standards for Sewage Works,
Current Edition? YES NO _____

FOR AGENCY USE ONLY
Comments:

SCHEDAB.APP

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

FOR IEPA USE:
LOG #
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, Illinois 62794-9276

SCHEDULE G SLUDGE DISPOSAL & UTILIZATION

1. Name of Project C & F Packing Company Wastewater Source & Pretreatment Equipment
2. General Information
- 2.1 Source(s) Wastewater from the Cleaning and Sanitation of Meat Processing Equipment
- 2.2 Production Volume per year 2,400,000 lbs Tons per year 1200 ton
- 2.3 Sludge to be disposed of is: Liquid X Dry _____
- 2.4 Sludge is: Aerobically digested _____ Anaerobically digested _____ Heat anaerobically digested _____ Raw _____ Chemically Stabilized _____
Composted _____ Wastewater Lagoon _____ WTP Lime _____ WTP Alum _____ WTP Iron _____ Other X, if other, describe Oil/Grease
Mixture _____, if mixture, describe _____
- 2.5 Is the sludge defined as hazardous by State or Federal Law? _____ YES X NO. If yes, basis _____
- 2.6 Is sludge to be stored on the STP site? _____ YES X NO. If yes, type of storage, lagoon _____ storage tank _____ other _____
If other, describe _____ capacity of storage, _____ cu. ft. _____
- 2.7 Sludge Hauling
- 2.7.1 Name(s), address(es) and Illinois Transporters I.D. Numbers KALUZYNY BROS., INC.
2324 MOUND ROAD, JOLIET, IL 60436
- 2.7.2 For industrial generators, has Illinois Generator Number and Authorization Number been issued? _____ YES X NO. If no, contact the Division of Land Pollution Control _____
- Illinois Generator ID Number SUBMITTED APPLICATION FOR ID NUMBER
- Authorization Number _____
3. Methods of Sludge Disposal and/or Utilization
- 3.1 Land Application NA
- 3.1.1 Indicate the number of dry tons of sludge per year to be disposed by each of the following methods:
Agricultural land _____, Commercial Fertilizer Production _____, Dedicated Land Disposal _____, Disturbed Land Reclamation _____, Silviculture _____
Horticultural Lands _____, Public Distribution _____, Other _____, if other, specify _____
- 3.1.2 Sludge Disposal Site Location. Provide a map (USGS Quadrangle map or plat map) showing location.
Name of USGS Quadrangle (7.5 or 15 minute) or plat map _____
- 3.1.3 Provide soil survey map and soil description for disposal site. Identify name of soil survey and map sheet number for each soil survey map provided.

3.1.4 Is sludge to be stored at disposal site? YES NO. If yes, describe and state the storage volume _____ cubic feet

3.1.5 Provide a copy of sludge user information sheet and completed, signed copies for any known users.

3.1.6 In a narrative description provide operation practices and design features to prevent ground and/or surface water pollution, portable water supply wellhead protection and other buffer distances, calculations supporting storage capacity, total acres available, soil characteristics, operational contingencies, etc.

3.1.7 Submit calculations of sludge application rate for agronomic rate, organic loading, and metal loading rate.

3.2 Landfilling NA

3.2.1 Sanitary Landfill Special Waste Landfill Hazardous Waste Landfill Other If other, specify _____

3.2.2 Name and Location of Landfill(s) _____

3.2.3 IEPA Permit Number(s) _____

3.3 Incineration NA

3.3.1 Name and Location _____

3.3.2 IEPA Permit Number(s) _____

3.3.3 Ultimate Disposal of Incinerator Residue _____

OTHER: Sludge is sold to & hauled by a rendering company, Kaluzny Bros., Inc., 2324 Mound Road, Joliet, IL 60436, who sell the rendered material to companies who manufacture cosmetic products. See Appendix B for sludge composition and rendering company information.

4. Sludge Characteristics

Submit complete analyses of sludge characteristics in mg/kg dry wt. basis unless otherwise indicated. The analyses shall be performed unless the sludge is disposed of by incineration or at an off-site landfill. Analyses performed shall include but not be limited to the parameters below:

Parameter	Parameter
% TS	Sulfur
% VS	Aluminum (total)
COD mg/l	Arsenic (total)
pH	Barium (total)
BOD5 mg/l	Cadmium (total)
Acidity meq of CaCO3 at pH _____	Cobalt (total)
Alkalinity meq CaCO3 at pH _____	Chromium, hex (total)
Oil and Grease mg/l	Chromium (total)
Phenols mg/l	Copper (total)
Cyanide	Iron (total)
Sulfate (total) mg/l	Mercury (total)
Sulfide (total) mg/l	Manganese (total)
Sodium	Molybdenum (total)
EC mmhos/cm	Nickel (total)
TOC	Lead (total)
Ammonia mg/l	Selenium (total)
Total Kjeldahl Nitrogen mg/l	Vanadium (total)
Phosphorus	Zinc (total)
Potassium	Radium 226 pCi/g
% Volatile Acids, if anaerobically digested	Radium 228 pCi/g
	Other*

*Include results of any hazardous waste characteristics tests performed for: 1) EP Toxicity, 2) Corrosivity, 3) Ignitability, and 4) Reactivity

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, IL 62708

SCHEDULE J INDUSTRIAL TREATMENT WORKS CONSTRUCTION OR PRETREATMENT WORKS

1. **NAME AND LOCATION:** C & F PACKING COMPANY, INC., 515 PARK AVENUE, LAKE VILLA, IL 60046

1.1 Name of project C & F Packing Company Wastewater Source & Pretreatment Equipment

1.2 Plant Location

1.2.1 Quarter Section 4 Section LAKE VILLA Township 10 Range P.M.

1.2.2 Latitude 42 ° 24 ' North
Longitude 88 ° 4 ' West

1.2.3 Name of USGS Quadrangle Map (7.5 or 15 Minutes) ANTIOCH (7.5 MINUTES)

2. **NARRATIVE DESCRIPTION AND SCHEMATIC WASTE FLOW DIAGRAM:** (see instructions)
See Appendix A

2.1 **PRINCIPAL PRODUCTS:** COOKED PROCESSED MEAT PRODUCTS

2.2 **PRINCIPAL RAW MATERIALS:** COOKED MEATS: PORK, BEEF, CHICKEN; PROCESS ADDITIVES INCLUDE SALT, SOY & SPICES.

3. **DESCRIPTION OF TREATMENT FACILITIES:**

3.1 Submit a flow diagram through all treatment units showing size, volumes, detention times, organic loadings, surface settling rate, weir overflow rate, and other pertinent design data. Include hydraulic profiles and description of monitoring systems.

3.2 Waste Treatment Works is: Batch , Continuous X; No. of Batches/day , No. of Shifts/day 2

3.3 Submit plans and specifications for proposed construction.

3.4 Discharge is: Existing ; Will begin on 08/20/01

4. **DIRECT DISCHARGE TO:** Receiving Stream Municipal Sanitary Sewer X Municipal storm or municipal combined sewer . If the receiving stream or storm sewer indicated complete the following:
Name of receiving stream ; tributary to
tributary to ; tributary to

5. Is the treatment works subject to flooding? If so, what is the maximum flood elevation of record (in reference to the treatment works data) and what provisions have been made to eliminate the flooding hazard? NO

6. **APPROXIMATE TIME SCHEDULE:** Estimated construction schedule
Start of Construction 08/15/01; Date of Completion 09/30/01
Operation Schedule NA; Date Operation Begins 09/30/01
100% design load to be reached by year NA

This Agency is authorized to require this information under Illinois Revised Statutes, 1978, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being permitted and could result in your application being denied. This form has been approved by the Forms Management Center.

7. DESIGN LOADINGS

7.1 Design population equivalent (one population equivalent is 100 gallons of wastewater per day, containing 0.17 pounds of BOD₅ and 0.20 pounds of suspended solids;

BOD NA; Suspended Solids NA; Flow NA

7.2 Design Average Flow Rate 225 gpm ; 324,000 gpd (Based on 24 hours per day) MGD.

7.3 Design Maximum Flow Rate 300 gpm; 432,000 gpd (Based on 24 hours per day) MGD.

7.4 Design Minimum Flow Rate 0 MGD.

7.5 Minimum 7-day, 10-year low flow NA cfs NA MGD.

Minimum 7-day, 10-year flow obtained from NA

7.6 Dilution Ratio NA ; NA

8. FLOW TO TREATMENT WORKS (if existing):

8.1 Flow (last 12 months)

8.1.1 Average Flow NA MGD

8.1.2 Maximum Flow NA MGD

8.2 Equipment used in determining above flows _____

9. Has a preliminary engineering report for this project been submitted to this Agency for Approval?

YES NO X. If so, when was it submitted and approved.

Date Submitted _____

Certification # _____

Dated _____

10. List Permits previously issued for the facility: Applications have been submitted.

11. Describe provisions for operation during contingencies such as power failures, flooding, peak loads, equipment failure, maintenance, shut-downs and other emergencies.

The Pretreatment system will not operate under any of the above conditions.

12. Complete and submit Schedule G if sludge disposal will be required by this facility.

13. WASTE CHARACTERISTICS: Schedule N must be submitted.

14. TREATMENT WORKS OPERATOR CERTIFICATION: List names and certification numbers of certified operators:

NA

IL 532-0019
 WPC 159

	RAW WASTE (mg / l)	TREATED EFFLUENT Avg. (mg / l) Max.	UPSTREAM (mg / l)	DOWNSTREAM SAMPLES (mg / l)
Fluoride	NTF	NTF	NA	NA
Hardness (as CaCO ₃)	NTF	NTF	NA	NA
Iron (total)	NTF	NTF	NA	NA
Lead	NTF	NTF	NA	NA
Manganese	NTF	NTF	NA	NA
NBA5	NTF	NTF	NA	NA
Mercury	NTF	NTF	NA	NA
Nickel	NTF	NTF	NA	NA
Nitrates (as N)	NTF	NTF	NA	NA
Oil & Grease (hexane solubles or equivalents)	1000	<50	NA	NA
Organic Nitrogen (as N)	NTF	NTF	NA	NA
pH	<2.0	7-9	NA	NA
Phenols	NTF	NTF	NA	NA
Phosphorous (as P)	NTF	NTF	NA	NA
Radioactivity	NTF	NTF	NA	NA
Selenium	NTF	NTF	NA	NA
Silver	NTF	NTF	NA	NA
Sulfate	NTF	NTF	NA	NA
Suspended Solids	1000	<200	NA	NA
Total Dissolved Solids	NTF	NTF	NA	NA
Zinc	NTF	NTF	NA	NA
Others				

EXHIBIT D

Illinois Environmental Protection Agency * * * * *
Permit Section, Division of Water Pollution Control
P.O. Box 19276
Springfield, IL 62794-9276
Application For Permit Or Construction Approval
WPC-PS-1

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OCT 08 2002

Environmental Protection Agency
BOW-PERMIT LOG IN

1. Name and Location: C & F PACKING COMPANY, INC., 515 PARK AVENUE, LAKE VILLA, IL 60046

Name of Project: C & F Packing Company Supplemental Permit Application to add equipment to Pretreatment System

Municipality or Township: LAKE VILLA County: LAKE

2. Brief Description of Project: Adding Pretreatment Equipment to Wastewater Source which Processes Cooked Meats to Produce Pizza

Toppings and Soup Bases, Pretreatment Equipment includes Equalization Tank and Dissolved Air Flootation Gravity Separator.

3. Documents Being Submitted: If the project involves any of the items listed below, submit the corresponding schedule and check the appropriate spaces.

SCREENED

Project

Table with 2 columns: Project Item and Status. Items include Private Sewer Connection/Extension, Sewer Extension Construct Only, Sewage Treatment Works, Excess Flow Treatment, Lift Station/Force Main, Sludge Disposal, Spray Irrigation, Septic Tanks, Industrial Treatment Pretreatment, Waste Characteristics, Erosion Control, Trust Disclosure.

Plans: - Title _____ Number of Pages: _____

Specifications: Title _____ Number of Books/Pages: _____

Other Documents (Please Specify) _____

4. Land Trust: Is the project identified in item number 1 herein, for which a permit is requested, to be constructed on land which is the subject of a trust? Yes No
If yes, Schedule T (Trust Disclosure) must be completed and item number 7.1.1 must be signed by a beneficiary, trustee, or trust officer.

5. This is an Application for (Check Appropriate Line):

- A. Joint Construction And Operating Permit
B. Authorization to Construction (See Instructions) NPDES Permit No. IL00 Issue Date
C. Construct Only Permit (Does Not Include Operations)
D. Operate Only Permit (Does Not Include Construction)

6. Certifications and Approval:

6.1 Certificate by Design Engineer (When required; refer to instructions)

I hereby certify that I am familiar with the information contained in this application, including the attached schedules indicated above, and that to the best of my knowledge and belief such information is true, complete, and accurate. The plans and specifications (specifications other than Standard Specifications or local specifications on file with this Agency) as described above were prepared by me or under my direction.

Engineer JEFFREY ZAK Name 062-052241 Registration Number Seal

Firm: SCIENTIFIC CONTROL LABORATORIES, INC.

Address: 3158 SOUTH KOLIN AVENUE

CHICAGO, IL 60623 Phone Number: (773) 254-2406

Signature X [Handwritten Signature]

7. Certifications and Approvals for Permits:

7.1 Certificate by Applicant(s)

I/We hereby certify that I/we have read and thoroughly understand the conditions and requirements of this Application, and am/are authorized to sign this application in accordance with the Rules and Regulations of the Illinois Pollution Control Board. I/We hereby agree to conform with the Standard Conditions and with any other Special Conditions mad part of this Permit.

7.1.1 Name of Applicant For Permit to Construct C & F PACKING COMPANY, INC.

515 PARK AVENUE LAKE VILLA IL 60046
Street City State Zip Code

Signature X [Handwritten Signature] DENNIS OLSON 847-245-2000
Printed Name Phone Number

Title CO-OWNER Organization C & F PACKING COMPANY, INC.

7.1.2 Name Of Applicant For Permit To Own and Operate _____

Street City State Zip Code

Signature X _____ Printed Name Phone Number

Title _____

7.2 Attested (Required When Applicant Is a Unit of Government)

Signature X _____ Date _____ Title _____ (City Clerk, Village Clerk, Sanitary Clerk, Etc.)

7.3 Applicants from non-governmental applicants which are not signed by the owner, must be signed by a principal executive officer of at least the level of vice president, or a duly authorized representative.

SCREENED

7.4 Certificate By Intermediate Sewer Owner

I hereby certify that (Please check one):

- 1. The sewers to which this project will be tributary have adequate reserve capacity to transport the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

Name and location of sewer system to which this project will be tributary: N473906/E 1006134

Sewer System Owner Village of Lake Villa
65 Cedar Street Lake Villa ILLINOIS 60046
Street City State Zip Code

Signature X Glenn McCall Date 9-20-02 Title Supt.

7.4.1 Additional Certificate By Intermediate Sewer Owner

I hereby certify that (Please check one):

- 1. The sewers to which this project will be tributary have adequate reserve capacity to transport the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

Name and location of sewer system to which this project will be tributary: Northwest Interceptor Sewer

Sewer System Owner Lake County Public Works
650 Winchester Road Libertyville ILLINOIS 60048
Street City State Zip Code

Signature X Martin Galantus Date 9-24-02 Title Supt.

7.5 Certificate By Waste Treatment Works Owner

I hereby certify that (Please check one):

- 1. The waste treatment plant to which this project will be tributary has adequate reserve capacity to treat the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

I also certify that the industrial waste discharges described in the application is capable of being treated by the treatment works.

Name and location of waste treatment works to which this project is tributary: NWR WRF

Treatment Works Owner Village of Fox Lake
200 Industrial Drive Fox Lake ILLINOIS 60020
Street City State Zip Code

Signature X Stan C. Vell Date 10/3/02 Title SUPERVISOR

Illinois Environmental Protection Agency
Permit Section, Division of Air Quality Control
P.O. Box 19276
Springfield, IL 62794-9276

For IEPA Use:

OCT 07 2002

Application For Permit Or Construction Approval
WPC-PS-1

Environmental Protection Agency
ROW-PERMIT LOG IN

1. Name and Location: C & F PACKING COMPANY, INC., 515 PARK AVENUE, LAKE VILLA, IL 60046

Name of Project: C & F Packing Company Supplemental Permit Application to add equipment to Pretreatment System

Municipality or Township: LAKE VILLA County: LAKE

SCREENED

2. Brief Description of Project: Adding Pretreatment Equipment to Wastewater Source which Processes Cooked Meats to Produce Pizza Toppings and Soup Bases, Pretreatment Equipment includes Equalization Tank and Dissolved Air Floatation Gravity Separator.

3. Documents Being Submitted: If the project involves any of the items listed below, submit the corresponding schedule, and check the appropriate spaces.

Project

Private Sewer Connection/Extension	A/B	_____	Spray Irrigation	H	_____
Sewer Extension Construct Only	C	_____	Septic Tanks	I	_____
Sewage Treatment Works	D	_____	Industrial Treatment Pretreatment	J	X
Excess Flow Treatment	E	_____	Waste Characteristics	N	X
Lift Station/Force Main	F	_____	Erosion Control	P	_____
Sludge Disposal	G	X	Trust Disclosure	T	_____

Plans: - Title _____ Number of Pages: _____

Specifications: Title _____ Number of Books/Pages: _____

Other Documents (Please Specify) _____

4. Land Trust: Is the project identified in item number 1 herein, for which a permit is requested, to be constructed on land which is the subject of a trust? Yes ___ No X
If yes, Schedule T (Trust Disclosure) must be completed and item number 7.1.1 must be signed by a beneficiary, trustee, or trust officer.

5. This is an Application for (Check Appropriate Line):

- _____ A. Joint Construction And Operating Permit
- _____ B. Authorization to Construction (See Instructions) NPDES Permit No. IL00 _____ Issue Date _____
- X _____ C. Construct Only Permit (Does Not Include Operations)
- _____ D. Operate Only Permit (Does Not Include Construction)

6. Certifications and Approval:

6.1 Certificate by Design Engineer (When required; refer to instructions)

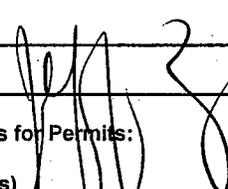
I hereby certify that I am familiar with the information contained in this application, including the attached schedules indicated above, and that to the best of my knowledge and belief such information is true, complete, and accurate. The plans and specifications (specifications other than Standard Specifications or local specifications on file with this Agency) as described above were prepared by me or under my direction.

Engineer JEFFREY ZAK 062-052241
Name Registration Number Seal

Firm: SCIENTIFIC CONTROL LABORATORIES, INC.

Address: 3158 SOUTH KOLIN AVENUE

CHICAGO, IL 60623 Phone Number: (773) 254-2406

Signature X 

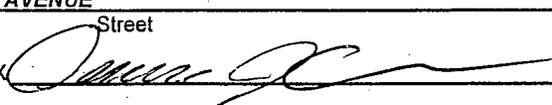
7. Certifications and Approvals for Permits:

7.1 Certificate by Applicant(s)

I/We hereby certify that I/we have read and thoroughly understand the conditions and requirements of this Application, and am/are authorized to sign this application in accordance with the Rules and Regulations of the Illinois Pollution Control Board. I/We hereby agree to conform with the Standard Conditions and with any other Special Conditions mad part of this Permit.

7.1.1 Name of Applicant For Permit to Construct C & F PACKING COMPANY, INC.

515 PARK AVENUE LAKE VILLA IL 60046
Street City State Zip Code

Signature X  DENNIS OLSON 847-245-2000
Printed Name Phone Number

Title CO-OWNER Organization C & F PACKING COMPANY, INC.

SCREENED

7.1.2 Name Of Applicant For Permit To Own and Operate _____

Street _____ City _____ State _____ Zip Code _____

Signature X _____ Printed Name _____ Phone Number _____

Title _____

7.2 Attested (Required When Applicant Is a Unit of Government)

Signature X _____ Date _____ Title _____
(City Clerk, Village Clerk, Sanitary Clerk, Etc.)

7.3 Applicants from non-governmental applicants which are not signed by the owner, must be signed by a principal executive officer of at least the level of vice president, or a duly authorized representative.

7.4 Certificate By Intermediate Sewer Owner

I hereby certify that (Please check one):

- 1. The sewers to which this project will be tributary have adequate reserve capacity to transport the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
- 2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

Name and location of sewer system to which this project will be tributary: N4739.6 / E 6006 134

Sewer System Owner Village of Lake Villa
605 Cedar Street Lake Villa ILLINOIS 60046
Street City State Zip Code

Signature X [Signature] Date 9-20-02 Title Supt.

7.4.1 Additional Certificate By Intermediate Sewer Owner

I hereby certify that (Please check one):

- 1. The sewers to which this project will be tributary have adequate reserve capacity to transport the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
- 2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

Name and location of sewer system to which this project will be tributary: Northwest Interceptor Sewer

Sewer System Owner Lake County Public Works
656 Winchester Road Libertyville ILLINOIS 60048
Street City State Zip Code

Signature X [Signature] Date 9-24-02 Title Supt.

7.5 Certificate By Waste-Treatment Works Owner

I hereby certify that (Please check one):

- 1. The waste treatment plant to which this project will be tributary has adequate reserve capacity to treat the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
- 2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

I also certify that the industrial waste discharges described in the application is capable of being treated by the treatment works.

Name and location of waste treatment works to which this project is tributary: NWR WRF

Treatment Works Owner Village of Fox Lake
200 Industrial Drive Fox Lake ILLINOIS 60080
Street City State Zip Code

Signature X [Signature] Date 10/3/02 Title SUPERVISOR

***** PCB 2006-053 *****

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

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DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, Illinois 62794-9276

OCT 07 2002

Environmental Protection Agency
BOW-PERMIT LOG IN

SCHEDULE G SLUDGE DISPOSAL & UTILIZATION

1. Name of Project C & F Packing Company Supplemental Permit Application to add equipment to Pretreatment System

2. General Information

2.1 Source(s) Wastewater from the Cleaning and Sanitation of Meat Processing Equipment

2.2 Production Volume per year 2,400,000 lbs Tons per year 1200 tpy

2.3 Sludge to be disposed of is: Liquid X Dry _____

2.4 Sludge is: Aerobically digested _____ Anaerobically digested _____ Heat anaerobically digested _____ Raw _____ Chemically Stabilized _____
Composted _____, Wastewater Lagoon _____, WTP Lime _____, WTP Alum _____, WTP Iron _____, Other X, If other, describe Oil/Grease
Mixture _____, If mixture, describe _____

2.5 Is the sludge defined as hazardous by State or Federal Law? _____ YES X NO. If yes, basis _____

2.6 Is sludge to be stored on the STP site? _____ YES X NO. If yes, type of storage, lagoon _____ storage tank _____ other _____

If other, describe _____ capacity of storage, _____ cu. ft.

2.7 Sludge Hauling

2.7.1 Name(s), address(es) and Illinois Transporters I.D. Numbers KALUZYNY BROS., INC.
2324 MOUND ROAD, JOLIET, IL 60436

2.7.2 For industrial generators, has Illinois Generator Number and Authorization Number been issued? _____ YES X NO. If no, contact the Division of Land Pollution Control

Illinois Generator ID Number SUBMITTED APPLICATION FOR ID NUMBER

Authorization Number _____

3. Methods of Sludge Disposal and/or Utilization

3.1 Land Application NA

3.1.1 Indicate the number of dry tons of sludge per year to be disposed by each of the following methods:

Agricultural land _____, Commercial Fertilizer Production _____, Dedicated Land Disposal _____, Disturbed Land Reclamation _____, Silviculture _____

Horticultural Lands _____, Public Distribution _____, Other _____, If other, specify _____

3.1.2 Sludge Disposal Site Location. Provide a map (USGS Quadrangle map or plat map) showing location.

Name of USGS Quadrangle (7.5 or 15 minute) or plat map _____

3.1.3 Provide soil survey map and soil description for disposal site. Identify name of soil survey and map sheet number for each soil survey map provided.

SCREENED

3.1.4 Is sludge to be stored at disposal site? YES NO. If yes, describe and state the storage volume _____

3.1.5 Provide a copy of sludge user information sheet and completed, signed copies for any known users.

3.1.6 In a narrative description provide operation practices and design features to prevent ground and/or surface water pollution, portable water supply wellhead protection and other buffer distances, calculations supporting storage capacity, total acres available, soil characteristics, operational contingencies, etc.

3.1.7 Submit calculations of sludge application rate for agronomic rate, organic loading, and metal loading rate.

3.2 Landfilling NA

3.2.1 Sanitary Landfill Special Waste Landfill Hazardous Waste Landfill Other If other, specify _____

3.2.2 Name and Location of Landfill(s) _____

3.2.3 IEPA Permit Number(s) _____ ; _____ ;

3.3 Incineration NA

3.3.1 Name and Location _____

3.3.2 IEPA Permit Number(s) _____ ; _____ ;

3.3. Ultimate Disposal of Incinerator Residue _____

****OTHER: Sludge is sold to & hauled by a rendering company, Kaluzny Bros., Inc., 2324 Mound Road, Joliet, IL 60436, who sell the rendered material to companies who manufacture cosmetic products. See Appendix B for sludge composition and rendering company information.**

4. Sludge Characteristics

Submit complete analyses of sludge characteristics in mg/kg dry wt. basis unless otherwise indicated. The analyses shall be performed unless the sludge is disposed of by incineration or at an off-site landfill. Analyses performed shall include but not be limited to the parameters below:

Parameter	Parameter
% TS	Sulfur
% VS	Aluminum (total)
COD mg/l	Arsenic (total)
pH	Barium (total)
BOD5 mg/l	Cadmium (total)
Acidity meq of CaCO3 at pH _____	Cobalt (total)
Alkalinity meq CaCO3 at pH _____	Chromium, hex (total)
Oil and Grease mg/l	Chromium (total)
Phenols mg/l	Copper (total)
Cyanide	Iron (total)
Sulfate (total) mg/l	Mercury (total)
Sulfide (total) mg/l	Manganese (total)
Sodium	Molybdenum (total)
EC mmhos/cm	Nickel (total)
TOC	Lead (total)
Ammonia mg/l	Selenium (total)
Total Kjeldahl Nitrogen mg/l	Vanadium (total)
Phosphorus	Zinc (total)
Potassium	Radium 226 pCi/g
% Volatile Acids, if anaerobically digested	Radium 228 pCi/g
	Other*

*Include results of any hazardous waste characteristics tests performed for: 1) EP Toxicity, 2) Corrosivity, 3) Ignitability, and 4) Reactivity

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

FOR IEPA USE:

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION

OCT 08 2002

Springfield, Illinois 62794-9276

Environmental Protection
Agency

SCHEDULE G SLUDGE DISPOSAL & UTILIZATION

BOW-PERMIT LOG IN

1. Name of Project C & F Packing Company Supplemental Permit Application to add equipment to Pretreatment System

2. General Information

2.1 Source(s) Wastewater from the Cleaning and Sanitation of Meat Processing Equipment2.2 Production Volume per year 2,400,000 lbs Tons per year 1200 tpy2.3 Sludge to be disposed of is: Liquid X Dry _____

2.4 Sludge is: Aerobically digested _____ Anaerobically digested _____ Heat anaerobically digested _____ Raw _____ Chemically Stabilized _____

Composted _____ Wastewater Lagoon _____ WTP Lime _____ WTP Alum _____ WTP Iron _____ Other X If other, describe Oil/Grease

Mixture _____, If mixture, describe _____

2.5 Is the sludge defined as hazardous by State or Federal Law? _____ YES X NO. If yes, basis _____2.6 Is sludge to be stored on the STP site? _____ YES X NO. If yes, type of storage, lagoon _____ storage tank _____ other _____

If other, describe _____ capacity of storage, _____ cu. ft.

2.7 Sludge Hauling

2.7.1 Name(s), address(es) and Illinois Transporters I.D. Numbers KALUZNY BROS., INC.2324 MOUND ROAD, JOLIET, IL 604362.7.2 For industrial generators, has Illinois Generator Number and Authorization Number been issued? _____ YES X NO. If no, contact the Division of Land Pollution ControlIllinois Generator ID Number SUBMITTED APPLICATION FOR ID NUMBER

Authorization Number _____

3. Methods of Sludge Disposal and/or Utilization

3.1 Land Application NA

3.1.1 Indicate the number of dry tons of sludge per year to be disposed by each of the following methods:

Agricultural land _____, Commercial Fertilizer Production _____, Dedicated Land Disposal _____, Disturbed Land Reclamation _____, Silviculture _____

Horticultural Lands _____, Public Distribution _____, Other _____, If other, specify _____

3.1.2 Sludge Disposal Site Location. Provide a map (USGS Quadrangle map or plat map) showing location.

Name of USGS Quadrangle (7.5 or 15 minute) or plat map _____

3.1.3 Provide soil survey map and soil description for disposal site. Identify name of soil survey and map sheet number for each soil survey map provided.

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3.1.4 Is sludge to be stored at disposal site? YES NO. If yes, describe and state the storage volume _____

3.1.5 Provide a copy of sludge user information sheet and completed, signed copies for any known users.

3.1.6 In a narrative description provide operation practices and design features to prevent ground and/or surface water pollution, portable water supply wellhead protection and other buffer distances, calculations supporting storage capacity, total acres available, soil characteristics, operational contingencies, etc.

3.1.7 Submit calculations of sludge application rate for agronomic rate, organic loading, and metal loading rate.

3.2 Landfilling NA

3.2.1 Sanitary Landfill Special Waste Landfill Hazardous Waste Landfill Other If other, specify _____

3.2.2 Name and Location of Landfill(s) _____

3.2.3 IEPA Permit Number(s) _____ ; _____ ;

3.3 Incineration NA

3.3.1 Name and Location _____

3.3.2 IEPA Permit Number(s) _____ ; _____ ;

3.3.3 Ultimate Disposal of Incinerator Residue _____

****OTHER: Sludge is sold to & hauled by a rendering company, Kaluzny Bros., Inc., 2324 Mound Road, Joliet, IL 60436, who sell the rendered material to companies who manufacture cosmetic products. See Appendix B for sludge composition and rendering company information.**

4. Sludge Characteristics

Submit complete analyses of sludge characteristics in mg/kg dry wt. basis unless otherwise indicated. The analyses shall be performed unless the sludge is disposed of by incineration or at an off-site landfill. Analyses performed shall include but not be limited to the parameters below:

Parameter	Parameter
% TS	Sulfur
% VS	Aluminum (total)
COD mg/l	Arsenic (total)
pH	Barium (total)
BOD5 mg/l	Cadmium (total)
Acidity meq of CaCO3 at pH _____	Cobalt (total)
Alkalinity meq CaCO3 at pH _____	Chromium, hex (total)
Oil and Grease mg/l	Chromium (total)
Phenols mg/l	Copper (total)
Cyanide	Iron (total)
Sulfate (total) mg/l	Mercury (total)
Sulfide (total) mg/l	Manganese (total)
Sodium	Molybdenum (total)
EC mmhos/cm	Nickel (total)
TOC	Lead (total)
Ammonia mg/l	Selenium (total)
Total Kjeldahl Nitrogen mg/l	Vanadium (total)
Phosphorus	Zinc (total)
Potassium	Radium 226 pCi/g
% Volatile Acids, if anaerobically digested	Radium 228 pCi/g
	Other*

*Include results of any hazardous waste characteristics tests performed for: 1) EP Toxicity, 2) Corrosivity, 3) Ignitability, and 4) Reactivity

7. DESIGN LOADINGS

7.1 Design population equivalent (one population equivalent is 100 gallons of wastewater per day, containing 0.17 pounds of BOD and 0.20 pounds of suspended solids;

BOD 972 (Actual); Suspended Solids 963 (Actual); Flow 660 (Actual)

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7.2 Design Average Flow Rate 195 gpm ; 280,800 gpd (Based on 24 hours per day) MGD.

7.3 Design Maximum Flow Rate 260 gpm; 374,400 gpd (Based on 24 hours per day) MGD.

7.4 Design Minimum Flow Rate 0 MGD.

7.5 Minimum 7-day, 10-year low flow NA cfs NA MGD.

Minimum 7-day, 10-year flow obtained from NA

7.6 Dilution Ratio NA ; NA

8. FLOW TO TREATMENT WORKS (if existing):

8.1 Flow (last 12 months)

8.1.1 Average Flow NA MGD

8.1.2 Maximum Flow NA MGD

8.2 Equipment used in determining above flows _____

9. Has a preliminary engineering report for this project been submitted to this Agency for Approval?

YES ___ NO X If so, when was it submitted and approved. Date Submitted _____

Certification # _____

Dated _____

10. List Permits previously issued for the facility: 2002-EN-0089

11. Describe provisions for operation during contingencies such as power failures, flooding, peak loads, equipment failure, maintenance, shut-downs and other emergencies.

The Pretreatment system will not operate under any of the above conditions.

12. Complete and submit Schedule G if sludge disposal will be required by this facility.

13. **WASTE CHARACTERISTICS:** Schedule N must be submitted.

14. **TREATMENT WORKS OPERATOR CERTIFICATION:** List names and certification numbers of certified operators:

To be determined.

***** PCB 2006-053 *****

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, IL 62706

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SCHEDULE J INDUSTRIAL TREATMENT WORKS CONSTRUCTION OR PRETREATMENT WORKS

Environmental Protection Agency
BOW-PERMIT LOG IN

1. NAME AND LOCATION: C & F PACKING COMPANY, INC., 515 PARK AVENUE, LAKE VILLA, IL 60046

1.1 Name of project C & F Packing Company Supplemental Permit Application to add equipment to Pretreatment System

1.2 Plant Location

1.2.1 Quarter Section 4 Section LAKE VILLA Township 10 Range P.M.

1.2.2 Latitude 42 ° 24 ' 30 " North

Longitude 88 ° 4 ' 30 " West

1.2.3 Name of USGS Quadrangle Map (7.5 or 15 Minutes) ANTIOCH (7.5 MINUTES)

2. NARRATIVE DESCRIPTION AND SCHEMATIC WASTE FLOW DIAGRAM: (see instructions)

See Appendix A

2.1 PRINCIPAL PRODUCTS: COOKED PROCESSED MEAT PRODUCTS

2.2 PRINCIPAL RAW MATERIALS: COOKED MEATS: PORK, BEEF, CHICKEN; PROCESS ADDITIVES INCLUDE SALT, SOY & SPICES.

3. DESCRIPTION OF TREATMENT FACILITIES:

3.1 Submit a flow diagram through all treatment units showing size, volumes, detention times, organic loadings, surface settling rate, weir overflow rate, and other pertinent design data. Include hydraulic profiles and description of monitoring systems.

3.2 Waste Treatment Works is: Batch , Continuous X; No. of Batches/day , No. of Shifts/day 2

3.3 Submit plans and specifications for proposed construction.

3.4 Discharge is: Existing X; Will begin on

4. DIRECT DISCHARGE TO: Receiving Stream Municipal Sanitary Sewer X Municipal storm or municipal combined sewer . If the receiving stream or storm sewer indicated complete the following:

Name of receiving stream ; tributary to ;

tributary to ; tributary to

5. Is the treatment works subject to flooding? If so, what is the maximum flood elevation of record (in reference to the treatment works data) and what provisions have been made to eliminate the flooding hazard? NO

6. APPROXIMATE TIME SCHEDULE: Estimated construction schedule

Start of Construction 09/02/02; Date of Completion 09/20/02

Operation Schedule NA; Date Operation Begins 09/20/02

100% design load to be reached by year NA

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

7. DESIGN LOADINGS

- 7.1 Design population equivalent (one population equivalent is 100 gallons of wastewater per day, containing 0.17 pounds of BOD and 0.20 pounds of suspended solids;

BOD 972 (Actual); Suspended Solids 963 (Actual); Flow 660 (Actual)

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7.2 Design Average Flow Rate 195 gpm ; 280,800 gpd (Based on 24 hours per day) MGD.

7.3 Design Maximum Flow Rate 260 gpm; 374,400 gpd (Based on 24 hours per day) MGD.

7.4 Design Minimum Flow Rate 0 MGD.

7.5 Minimum 7-day, 10-year low flow NA cfs MGD.

Minimum 7-day, 10-year flow obtained from NA

7.6 Dilution Ratio NA ; _____

8. FLOW TO TREATMENT WORKS (if existing) :

8.1 Flow (last 12 months)

8.1.1 Average Flow NA MGD

8.1.2 Maximum Flow NA MGD

8.2 Equipment used in determining above flows _____

9. Has a preliminary engineering report for this project been submitted to this Agency for Approval?

YES ___ NO X If so, when was it submitted and approved.

Date Submitted _____

Certification # _____

Dated _____

10. List Permits previously issued for the facility: 2002-EN-0089

11. Describe provisions for operation during contingencies such as power failures, flooding, peak loads, equipment failure, maintenance, shut-downs and other emergencies.

The Pretreatment system will not operate under any of the above conditions.

12. Complete and submit Schedule G if sludge disposal will be required by this facility.

13. WASTE CHARACTERISTICS: Schedule N must be submitted.

14. TREATMENT WORKS OPERATOR CERTIFICATION: List names and certification numbers of certified operators:

To be determined.

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

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DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, IL 62706

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SCHEDULE N WASTE CHARACTERISTICS

- Name of Project C & F Packing Company Supplemental Permit Application to add equipment to Pretreatment System
- FLOW DATA**

	EXISTING	PROPOSED-DESIGN
2.1 Average Flow (gpd)	<u>66,000</u>	<u>280,800*</u>
2.2 Maximum Daily Flow (gpd)	<u>100,000</u>	<u>374,400*</u>

2.3 **TEMPERATURE** * based on a 24 hour work day

Time of year	Ave. Intake Temp. F	Ave. Effluent Temp. F	Max. Intake Temp. F	Max. Effluent Temp. F	Max Temp Outside Mixing Zone F
SUMMER	<u>NA</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
WINTER	<u>NA</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

2.4 Minimum 7-day, 10-year flow: NA cfs MGD.

2.5 Dilution Ratio: NA ;

2.6 Stream flow rate at time of sampling NA cfs MGD.
- CHEMICAL CONSTITUENT** Existing Permitted Conditions ; Existing conditions ; Proposed Permitted Conditions X

Type of sample: grab (time of collection); composite (Number of samples per day)

(see instructions for analyses required)

Constituent	RAW WASTE (mg / l)	TREATED EFFLUENT Avg. (mg / l) Max.	UPSTREAM DOWNSTREAM SAMPLES
Ammonia Nitrogen (asN)	NTF	NTF	NA
Arsenic (Total)	NTF	NTF	NA
Barium	NTF	NTF	NA
Boron	NTF	NTF	NA
BOD ₅	> 1000	<300	NA
Cadmium	NTF	NTF	NA
Carbon Chloroform Extract	NTF	NTF	NA
Chloride	NTF	NTF	NA
Chromium (total hexavalent)	NTF	NTF	NA
Chromium (total trivalent)	NTF	NTF	NA
Copper	NTF	NTF	NA
Cyanide (total)	NTF	NTF	NA
Cyanide (readily released 150°F & pH 4.5)	NTF	NTF	NA
Dissolved Oxygen	NTF	NTF	NA
Fecal Coliform	NTF	NTF	NA

***** PCB 2006-053 *****

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DOWNSTREAM ANALYSIS

	RAW WASTE (mg / l)	TREATED EFFLUENT Avg. (mg / l) Max.	UPSTREAM (mg / l)	DOWNSTREAM ANALYSIS (mg / l)
Fluoride	NTF	NTF	NA	NA
Hardness (as CaCO ₃)	NTF	NTF	NA	NA
Iron (total)	NTF	NTF	NA	NA
Lead	NTF	NTF	NA	NA
Manganese	NTF	NTF	NA	NA
MBAS	NTF	NTF	NA	NA
Mercury	NTF	NTF	NA	NA
Nickel	NTF	NTF	NA	NA
Nitrates (as N)	NTF	NTF	NA	NA
Oil & Grease (hexane solubles or equivalents)	300	<50	NA	NA
Organic Nitrogen (as N)	NTF	NTF	NA	NA
pH	<2.0	7-9	NA	NA
Phenols	NTF	NTF	NA	NA
Phosphorous (as P)	NTF	NTF	NA	NA
Radioactivity	NTF	NTF	NA	NA
Selenium	NTF	NTF	NA	NA
Silver	NTF	NTF	NA	NA
Sulfate	NTF	NTF	NA	NA
Suspended Solids	1000	<350	NA	NA
Total Dissolved Solids	NTF	NTF	NA	NA
Zinc	NTF	NTF	NA	NA
Others				

*** PCB 2006-053 ***

FOR IEPA USE:
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2752-02

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

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DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, IL 62706

Environmental Protection Agency
BOW-PERMIT LOG IN

SCHEDULE N WASTE CHARACTERISTICS

1. Name of Project C & F Packing Company Supplemental Permit Application to add equipment to Pretreatment System

2. FLOW DATA	EXISTING	PROPOSED-DESIGN
2.1 Average Flow (gpd)	<u>66,000</u>	<u>280,800*</u>
2.2 Maximum Daily Flow (gpd)	<u>100,000</u>	<u>374,400*</u>

2.3 TEMPERATURE * based on a 24 hour work day

Time of year	Ave. Intake Temp. F	Ave. Effluent Temp. F	Max. Intake Temp. F	Max. Effluent Temp. F	Max Temp Outside Mixing Zone F
SUMMER	<u>NA</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
WINTER	<u>NA</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

2.4 Minimum 7-day, 10-year flow: NA cfs MGD.
 2.5 Dilution Ratio: NA ;
 2.6 Stream flow rate at time of sampling NA cfs MGD.

3. CHEMICAL CONSTITUENT Existing Permitted Conditions ; Existing conditions ; Proposed Permitted Conditions X
 Type of sample: grab (time of collection); composite (Number of samples per day)
 (see instructions for analyses required)

Constituent	RAW WASTE (mg/l)	TREATED EFFLUENT Avg. (mg/l) Max.	UPSTREAM DOWNSTREAM SAMPLES
Ammonia Nitrogen (asN)	NTF	NTF	NA
Arsenic (Total)	NTF	NTF	NA
Barium	NTF	NTF	NA
Boron	NTF	NTF	NA
BOD ₅	> 1000	<300	NA
Cadmium	NTF	NTF	NA
Carbon Chloroform Extract	NTF	NTF	NA
Chloride	NTF	NTF	NA
Chromium (total hexavalent)	NTF	NTF	NA
Chromium (total trivalent)	NTF	NTF	NA
Copper	NTF	NTF	NA
Cyanide (total)	NTF	NTF	NA
Cyanide (readily released 150°F & pH 4.5)	NTF	NTF	NA
Dissolved Oxygen	NTF	NTF	NA
Fecal Coliform	NTF	NTF	NA

EXHIBIT E



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
 JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR RENEE CIPRIANO, DIRECTOR

217/782-9720

CERTIFIED MAIL # 7002 3150 0000 1107 7840
 RETURN RECEIPT REQUESTED

November 1, 2004

C & F Packing Company
 515 Park Avenue
 Lake Villa, Illinois 60046
 Attention: Mr. Dennis Olson

Re: Violation Notice: W-2004-00568
Facility I.D.: ILU000624

Dear Mr. Olson:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act, 415 ILCS 5/31(a)(1), and is based upon review of available information and investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of violations of environmental statutes, regulations or permits as set forth in Attachment A to this letter. Attachment A includes an explanation of the activities that the Illinois EPA believes may resolve the specified violations, including an estimate of a reasonable time period to complete the necessary activities. However, due to the nature and seriousness of the violations cited, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. The response must address each violation specified in Attachment A and include for each, an explanation of the activities that will be implemented and the time schedule for the completion of each activity. Also, if a pollution prevention activity will be implemented, indicate that intention in any written response. The written response will constitute a proposed Compliance Commitment Agreement ("CCA") pursuant to Section 31 of the Act. The Illinois EPA will review the proposed CCA and will accept or reject the proposal within 30 days of receipt.

ROCKFORD - 4302 North Main Street, Rockford, IL 61103 - (815) 987-7760 • DES PLAINES - 9511 W. Harrison St., Des Plaines, IL 60016 - (847) 294-4000
 ELGIN - 595 South State, Elgin, IL 60123 - (847) 608-3131 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463
 BUREAU OF LAND - PEORIA - 7620 N. University St., Peoria, IL 61614 - (309) 693-5462 • CHAMPAIGN - 2123 South First Street, Champaign, IL 61820 - (217) 278-5800
 SPRINGFIELD - 4300 S. Sixth Street Rd., Springfield, IL 62706 - (217) 786-4892 • COLLINSVILLE - 2009 Mall Street, Collinsville, IL 62234 - (618) 346-5120
 MARION - 2309 W. Main St., Suite 116, Marion, IL 62959 - (618) 993-7200

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Page 2
C & F Packing Company
VN W-2004-00568

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with a referral to the prosecutorial authority.

Written communications should be directed to BEVERLY BOOKER at the ILLINOIS EPA, BUREAU OF WATER, CAS #19, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276. All communications must include reference to this Violation Notice number, W-2004-00568.

Questions regarding this Violation Notice should be directed to BARB CONNER at 217/782-9720.

Sincerely,



Michael S. Garretson, Acting Manager
Compliance Assurance Section
Bureau of Water

Attachment A
Inspection Report Enclosed

bcc: Barb Conner
Beverly Booker
Tim Kluge
Des Plaines Region, WPC
Connie Tonsor, DLC
Chuck Gunnarson, DLC
Records Unit
Tarea Lee

PAGE 1 OF 2

ATTACHMENT A

ILU000624

C & F PACKING COMPANY

VIOLATION NOTICE: W-2004-00568

Questions regarding the violations identified in this attachment should be directed to Barb Conner at (217) 782-9720.

On July 9 and 10, 2004, the operators at the Village of Fox Lake Water Reclamation Facility noted a slug load, which was traced to C & F Packing. The operators called C & F Packing and were informed that a malfunction in the pretreatment system had resulted in the slug loads at the POTW. On August 15, 2004, the Village of Lake Villa was called out for a sanitary sewer manhole overflow on Park Avenue and Route 83 directly across the street from C & F Packing. The cause was found to be an obstruction of the sewer flows due to accumulated grease in the area of the company's lateral connection to the sewer.

On September 3, 2004, representatives of the Villages of Fox Lake and Lake Villa and of the Illinois EPA conducted a follow-up site investigation. During this investigation, both the manhole with the C & F Packing connection in the sanitary service line, which had been plugged, and the manhole across the street, which had overflowed, were observed. All overflowed sewage entered a catch basin that discharges into a pond in a residential subdivision. The pond was entrenched with algae. This pond overflows into the storm sewer, which ultimately flows to the wetlands. An inspection was also made of the C & F Packing pretreatment system. During this inspection it was noted that the existing pretreatment system deviated significantly from the plans and specifications that were submitted to the Illinois EPA and permitted by Permit No. 2002-EN-0089-1.

A review of information available to the Illinois EPA indicates the following violations of statutes, regulations or permits. Included with each type of violation is an explanation of the activities the Illinois EPA believes may resolve the violations including an estimated time period for resolution.

Pass Through/Interference

C & F Packing has discharged wastewater with a high concentration of grease causing an obstruction of sewer flows and slug loads at the Village of Fox Lake Water Reclamation Facility. This situation is expected to be resolved immediately.

<u>Violation Date</u>	<u>Violation Description</u>
07/09/2004, 07/10/2004, and 08/15/2004	No person shall introduce pollutants which interfere with the operation or performance of the POTW.
Rule/Reg.:	Section 12(a) and (h) of the Act, 415 ILCS 5/12(a) and (h) (2004), 35 Ill. Adm. Code 307.1101 (a) (2)

PAGE 2 OF 2

ATTACHMENT A

ILU000624

C & F PACKING COMPANY

VIOLATION NOTICE: W-2004-00568

Systems Reliability

Review the operations/operational procedures of the pretreatment system and evaluate the equipment in order to correct the deficiencies, which caused the violations. Compliance is expected to be achieved immediately.

<u>Violation Date</u>	<u>Violation Description</u>
0709/2004 and 07/10/2004	All treatment works and associated facilities shall be so constructed and operated as to minimize violations of applicable standards.
Rule/Reg.:	Section 12(a) of the Act, 415 ILCS 5/12(a) (2004), 35 Ill. Adm. Code 306.102

Failure to Construct Wastewater Treatment Facility as Permitted by Illinois EPA

Take the appropriate actions to assure that the pretreatment system conforms with the plans and specifications that were submitted to the Illinois EPA resulting in the issuance of the construct and/or operating Permit No. 2002-EN-0089-1. Compliance is expected to be achieved within 45 days.

<u>Violation Date</u>	<u>Violation Description</u>
09/03/2004	There shall be no deviations from the approved plans and specifications.
Rule/Reg.:	Section 12(b) of the Act, 415 ILCS 5/12(b) (2004), Standard Condition 3 of Permit No. 2002-EN-0089-1

MEMORANDUM

DATE: October 5, 2004

TO: Roger Callaway, CAS

FROM: Chris Kallis, DWPC- FOS

SUBJECT: C&F Packing
Sanitary Sewer Overflow

This facility is a manufacturing plant for sausages and other processed meats (SIC Code 2013). It is located on 515 Park Avenue in the Village of Lake Villa in Lake County. All runoff and storm sewers in the area are tributary to wetlands that drain into Eagle Creek, which is part of the Squaw Creek sub basin and Fox River watershed. The facility was the subject of an enforcement action by the Agency for construction activity not being covered under the NPDES Permit for storm water, subsequent water quality violations and connecting sanitary sewers without a permit issued by the Agency.

On February 13, 2002, the facility was issued a permit (2002-EN-0089) to construct a connection to the sewer system and pretreatment system. The actual flow was to include 3000 gpd of (30 P.E.) of sanitary wastewater and an average of 440, 000 gpd (662 P.E.) and 70,000 gpd maximum of process wastewater giving the total project a loading of 692 P.E. However, the design flow rate of the pretreatment system according to the permit is 324,000 gpd DAF and 432,000 gpd DMF. The system was to consist of an 18,000 aerated gravity separator, a 5000-gallon grease storage tank and a 5000-gallon sludge storage tank sludge/ solids holding tank. This was shown to be inadequate in meeting the Fox Lake POTW ordinance limits.

On October 7, 2002, the submitted an application for a supplemental permit to add equipment to a pretreatment system. The application asked for an addition of a 1,900-gallon sump tank with two level control pumps rated at a maximum of 150 gpm apiece. According the flow diagram, the wastewater would be pumped to a circular 18,000-gallon equalization tank that the application says was converted from the 18,000-gallon aerated gravity separator on the original permit. This would then be diverted by way of a 275-gallon pump to an 18,000-gallon Krofta dissolved air flotation unit. The application, which was put together by Scientific Control Laboratories, Inc. also asked for an additional 5,000-gallon stage tank and a 250-gallon collection bin. The modified permit (2002-EN-0089-1) was issued on December 24, 2002. The design flow rate at DAF was increased to 280,000 gpd while the DMF was decreased to 374,000 gpd. The permit also lists the

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C & F Packing
October 5, 2004
Page 2

actual flows as 66,000 gpd on the average (972 P.E.) with a maximum of 100,000 gpd. With 300 P.E as domestic flows, the total loading is 1002 P.E.

On Sunday, August 15, 2004 at 9:25 p.m. the Village of Lake Villa was called out for a sanitary sewer manhole overflowing on Park Avenue and Route 83 directly across the street from C & F packing. The wastewater source was a residential neighborhood with no industries. The cause was found to be an obstruction of the sewer flows due accumulated grease in the area of company's lateral connection. The Village was forced to request assistance from the Village of Round Lake Beach in the form of a vac truck. They were unable to contact anyone from the company but did inform the Village of Fox Lake, who owns the service area's receiving POTW and is the pretreatment control authority.

On September 3, 2004 a follow-up site investigation was conducted. Meeting me at the site was Robert Ferger and Doug Fox of the Village of Fox Lake and Jim Bowles of the Village of Lake Villa. Mr. Bowles showed both the manhole with the C & F connection in the sanitary service line (which runs east to west) that was plugged and the overflowing manhole across the street to the east. All overflowed sewage entered a catch basin that discharges into a pond in the residential subdivision. This pond overflows into the storm sewer, which ultimately directs flows to the wetlands. It should be noted that the pond was entrenched with algae. At the time of the site visit, an algae control company was servicing it.

Inside the C&F Packing plant we met with Denis Olson and Martin Glab. A review of the incident was made. On July 9 and 10, Fox Lake operators at the POTW noted a slug load. It was traced to C & F Packing on the 10th. Unable to contact anyone on site, they called the plant and were finally contacted back by Dennis Olsen who told them of a PT failure. According to C&F, the problems began on the 9th or 10th when a switch caused a level sensor fault in the pretreatment system resulting in an overflow of the tanks. As the wastewater collected in a pit, it caused the 250-gallon collection bin to start floating. As it rose, it caused a rupture in a pipe that allowed a direct bypass of water from the overflowing equalization basin directly to a line, which would direct flows to sanitary sewer off site. Apparently, when staff arrived the accumulated wastewater in the pit was not only being directed to the sanitary sewer but was boiling due to contact with a broken electric cable. There was no short circuit because it was conducting through the grease! It was established while repairs were made, the Krofta unit was being bypassed for at least three days. The Village of Fox Lake officials stated that they had reason to believe that all units were bypassed. In any case, when they found that there was a bypass line (which is not on any plans and specifications including those submitted with the permit application), they had the valve locked.

The Village of Fox Lake officials were skeptical at some of the claims made by C & F staff. According to them, there were discrepancies between statements made by various personnel on when this mishap had actually been discovered. They also expressed doubts that only the Krofta was being bypassed. This was based on the concentration of wastewater and grease found the sewer system to the extent that it caused slug loads at the POTW.

SCREENED

C & F Packing
October 5, 2004
Page 3

An inspection was made of the treatment system. On site was Greg Rymer, who is the only certified operator assigned to this facility. The inspection revealed significant and major deviations from approved plans and specifications. The 1,900-gallon sump tank with pumps is non-existent. All wastewater is gravity fed through floor drains. It then diverted to the now converted equalization tank that (as opposed to drawings) is actually rectangular. From there flows are diverted, based on the level control pump, to the Krofta Unit. This unit is not the 18,000-gallon air flotation device as in the submitted plans and specifications and approved permit. It is actually only 10 feet in diameter and 2.75 feet deep giving it an actual capacity of about 1616 gallons. It should be noted there are four sludge storage tanks. Signs of spillage were visible.

In a follow-up call with Mr. Giab, I was informed that the company was planning to build a totally new treatment plant. He wanted to know if still had to submit a permit modification as requested during the inspection. I told him that as long as the facility was not as described in the permit, they were in apparent violation.

In summary, C& F Packing has been shown to be in violation of the following:

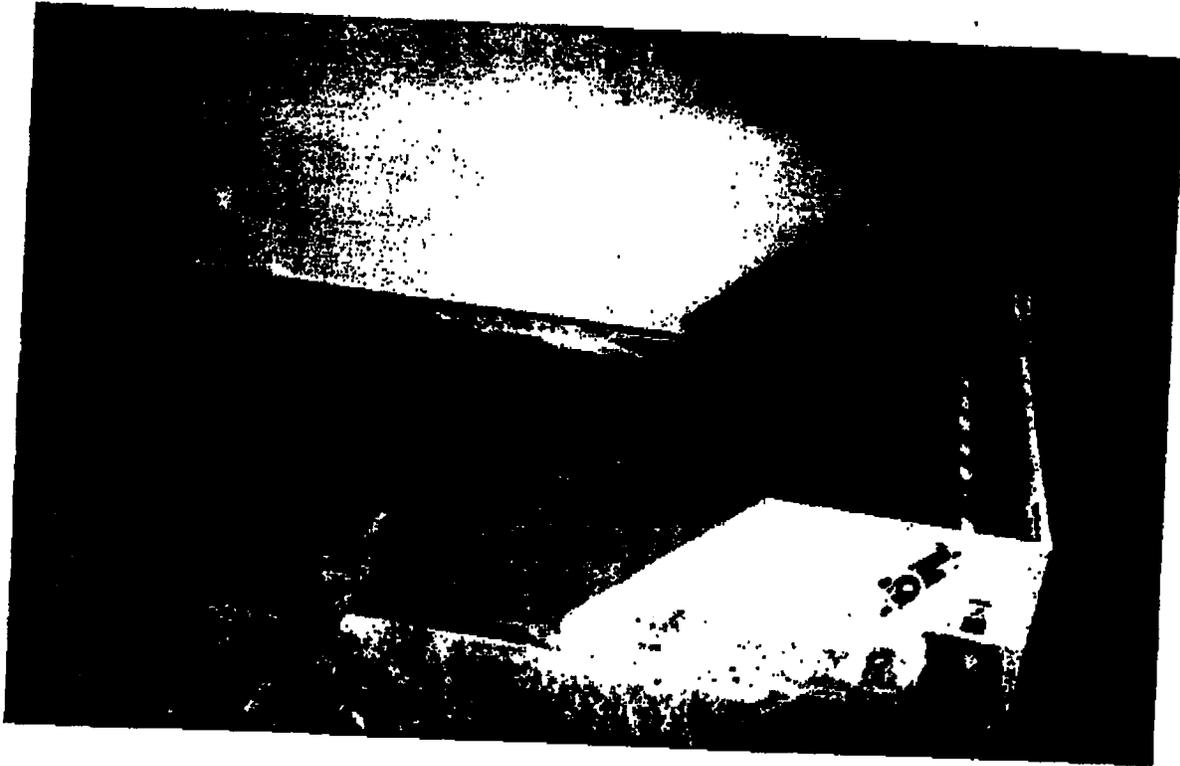
- The facility discharged wastes, which caused obstruction in the sewers. The obstructions resulted in overflows from Village of Lake Villa sewers causing discharge of contaminants to Waters of the State in violation of 35 IAC 308.304 (overflows). This was a violation Section 12 b of the Illinois Environmental Protection Act due its non-compliance with Special Condition 12 of construction permit 2002 -EN-0089.
- The deviations from approved plans and specifications were a violation of Standard Condition 3 of Permit 2002-EN 0089-1 and 12b of the Illinois Environmental Protection Act.
- This facility has not been operated as to minimize violations of the applicable standard in violation of 35 IAC (Systems Reliability - malfunctions). This includes violating 35 IAC 312.101 that disallows the use or operation of any treatment works unless it is under the direct and active field supervision of a person who has been certified by the Agency. Though one certified operator is assigned to this facility, it is run on three shifts and the weekends.

Any correspondence should be sent to the following:

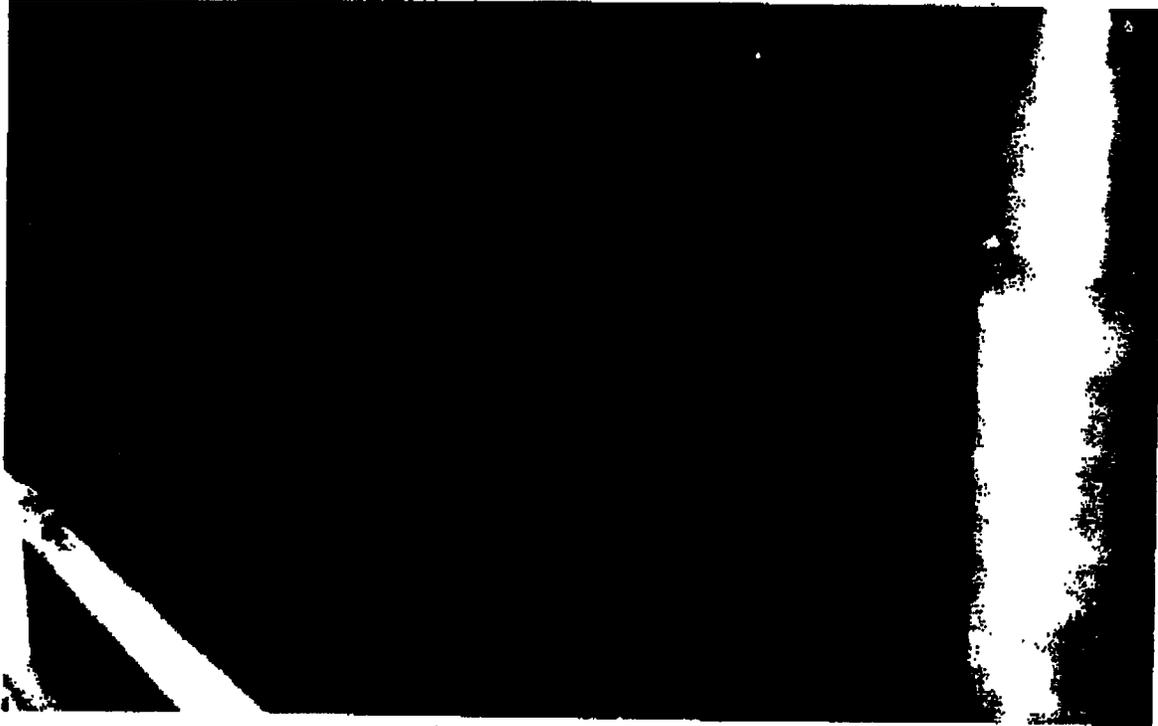
C & F Packing Company
615 Park Avenue
Lake Villa, Illinois 60046
Attention: Dennis Olson

Attached to this memo the approved and actual flow diagram, the inspection reports conducted by Fox Lake, incident report by Lake Villa and Agency photos.

SCREENED



SEARCHED



SCREENED



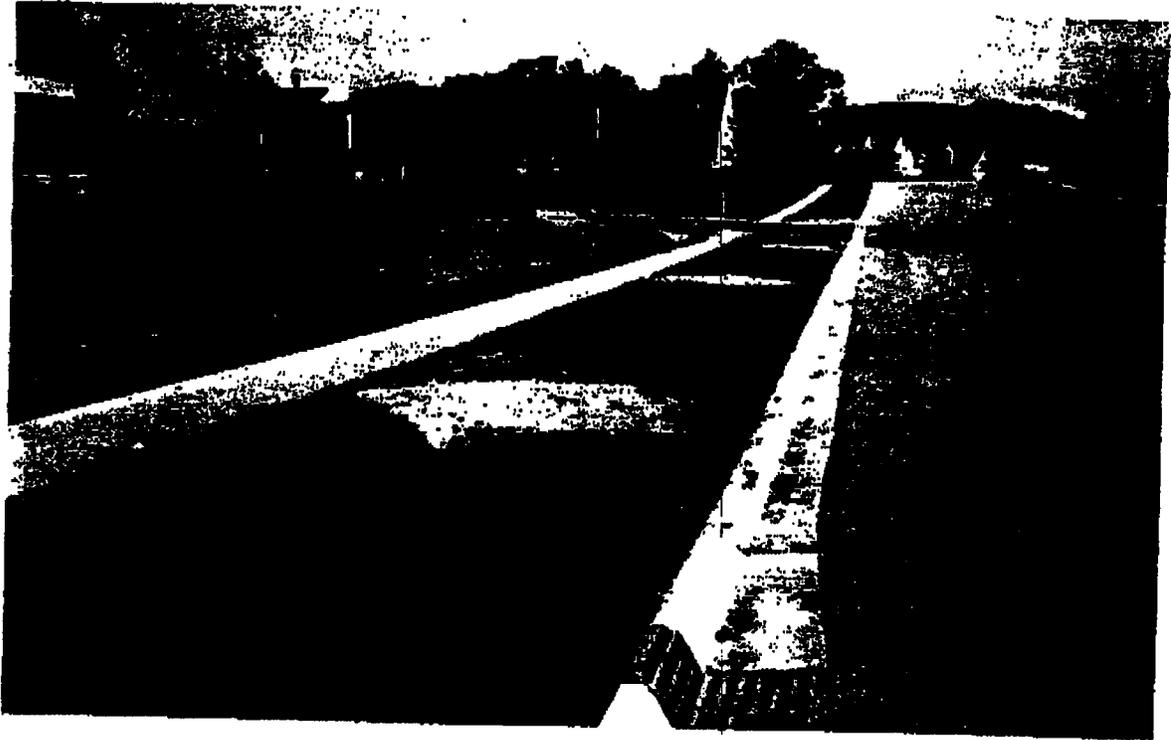
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RECEIVED



SCREENED



RECEIVED



UNRECORDED



SCREENED



SCREENED

EXHIBIT F

MECKLER BULGER & TILSON LLP

JEFFREY A. BERMAN
ANNE L. BLUME
BRIAN W. BULGER
JACK J. CARRIGLIO
JANET R. DAVIS
JOHN E. DELASCIO
KAREN M. DIXON
J. STUART GARBUTT
PAUL R. GARRY
BRENT J. GRABER
J. ROBERT HALL
REBECCA R. HALLER
BRETT D. HEINRICH
JAMES J. HICKEY
RICHARD A. HODVL, JR.
JAMES H. KALLIANIS, JR.
CHRISTOPHER E. KENTRA
PHILIP R. KING
MARI HENRY LEIGH
MICHAEL I. LEONARD
MICHAEL S. LOEFFLER
MICHAEL M. MARICK

KENT MAYNARD, JR.
MICHAEL D. MCCORMICK
BRUCE R. MECKLER
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ERIC E. NEWMAN
OMAR S. ODLAND
MEAGHAN L. SCHNEIDER
E. LYNETTE STAFFORD
RONALD A. STEARNEY, JR.
SARA G. UFFELMAN
ANNA WERMUTH

January 11, 2005

VIA CERTIFIED MAIL AND FEDERAL EXPRESS

Ms. Barb Conner and Ms. Beverly Booker
Illinois Environmental Protection Agency
Bureau of Water
P.O. Box 19276
Springfield, Illinois 62794

Re: Violation Notice: W-2004-00568
Facility I.D.: ILU000624
Compliance Commitment Agreement

Dear Ms. Conner and Ms. Booker:

As requested in Violation Notice W-2004-00568, C&F Packing Co., Inc. is submitting the enclosed Compliance Commitment Agreement. This proposed CCA is being submitted in furtherance of the goals of the Agency's pre-enforcement process under Section 31(a) of the Act. Based on the steps which have already been taken by C&F Packing, we ask that the Agency accept this CCA. By allowing C&F Packing to satisfy its commitments in this CCA, the Agency will achieve its objective of obtaining compliance with the Act.

In the Violation Notice, the Illinois EPA requested that C&F Packing submit a written response, and further explained that the response would constitute a CCA. The CCA was due within 45 days of receipt of the Violation Notice. In lieu of responding to the Violation Notice with a written response, C&F Packing requested a meeting with the Illinois EPA to discuss the alleged violations. The meeting was held on December 21, 2004. Following the meeting, the Illinois EPA advised C&F Packing that the CCA would be due in 21 days, or on January 11, 2005.

MECKLER BULGER & TILSON LLP

Page 2

January 11, 2005

The pre-enforcement process is intended to give a potential violator the opportunity to resolve alleged violations without being subject to a formal enforcement action.¹ Formal enforcement is to be used to address alleged violations which remain the subject of disagreement following the pre-enforcement process.² During the meeting of December 21, 2004 and a telephone conversation between Matthew Cohn and Chuck Gunnarson on December 28, 2004, references were made by Mr. Gunnarson to the imposition of civil penalties.³ For civil penalties to be assessed, this matter must be referred to the office of the Illinois Attorney General or the States Attorney for Lake County for the initiation of a formal enforcement process.⁴ Thus, in order for this matter to be referred for formal enforcement, the CCA must be rejected by the Agency. We believe that civil penalties are not warranted in this case, and any application of them would not aid in the enforcement of the Act and would be strictly punitive. As explained by the Illinois Supreme Court, civil penalties should only be used to aid in the enforcement of the Act, and punitive considerations must be secondary.⁵

On occasion, the Agency has rejected technically adequate and timely CCAs for the sole purpose of collecting civil penalties. In People v. Texaco, the Illinois EPA rejected the proposed CCA not because it contained any technical deficiencies, but merely because the People wanted to collect a civil penalty.⁶ In an enforcement action against the Scotts Company, the Agency denied a technically adequate CCA solely for the purpose of collecting a civil penalty. In the Scotts Company case, Inspector James Haennicke said, "If the CCA were to be accepted, the Illinois EPA may be barred from obtaining statutory penalties for the violations. Therefore, it is common for an acceptable CCA to be rejected when the Agency believes it is appropriate to seek a civil penalty."⁷

We believe that such a practice of dismissing the CCAs of cooperative respondents which were submitted in good faith does not encourage compliance with Act. The Agency should reserve the formal enforcement process and civil penalties for uncooperative respondents. For example, formal enforcement and civil penalties are appropriate where the proposed CCA is technically deficient and submitted after the statutory deadline.⁸ On the contrary, C&F Packing is submitting a timely and detailed CCA which addresses the Agency's concerns.

Like in City of Chicago v. Illinois Pollution Control Board,⁹ C&F Packing has taken steps to achieve compliance before the filing of a complaint, or in this case, before the commencement of the pre-enforcement process. C&F Packing has proposed a plan which details

¹ Illinois Environmental Protection Agency v. Caricco, 2004 WL 2074214, *9 (Ill.Poll.Control.Bd.); EGS Watts, Inc. v. Illinois Environmental Protection Agency, 2003 WL 728348, *1-2 (Ill.Poll.Control.Bd.).

² EGS Watts, Inc. v. Illinois Environmental Protection Agency, 2003 WL 728348, *2 (Ill.Poll.Control.Bd.).

³ At the December 21, 2004 meeting, Mr. Gunnarson stated that the Agency reserved its right to impose civil penalties; on December 28, 2004, Mr. Gunnarson told counsel for C&F Packing that even a "stellar CCA" could be rejected if the Agency believed that assessing civil penalties was warranted.

⁴ 415 ILCS 5/31(b).

⁵ See, So. Ill. Asphalt Co. v. Illinois Pollution Control Board, 60 Ill.2d. 204, 207 (1975).

⁶ 2003 WL 22761195, *2 (Ill. Pol.Control.Bd.).

⁷ Facility Admits Violation, Accepts Fine, Illinois EPA - Legal Sidebar (Summer 1999).

⁸ People v. J. McDaniel, Inc., Case No. 05-110 (Ill.Poll.Control.Bd.).

⁹ 57 Ill.App.3d 517, 523 (1978).

MECKLER BULGER & TILSON LLP

Page 3

January 11, 2005

its compliance activities. We ask that the Illinois EPA accept this CCA, and allow C&F Packing to carry forward the commitments contained in it. We believe that doing so will further the Agency's enforcement goal of achieving full compliance with the Act.

Sincerely,



Matthew E. Cohn

Enclosure: CCA

cc: Michael S. Garretson
Chuck Gunnarson
Bill Ingersoll
Michael McCabe

MECKLER BULGER & TILSON LLP

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January 11, 2005

bcc: Dennis Olson
Martin Glab

N:\2333\corres\2005-01-11 Cover Letter for CCA.doc

January 11, 2005

COMPLIANCE COMMITMENT AGREEMENT
C&F PACKING COMPANY, INC., LAKE VILLA, ILLINOIS
VIOLATION NOTICE W-2004-00568

Background

On February 19, 2000, the United States Environmental Protection Agency ("U.S. EPA") authorized the pretreatment program of the Northwest Regional Water Reclamation Facility ("NWRWRF") in Fox Lake, Illinois, and modified its NPDES Permit No. IL0020568 accordingly. On May 1, 2001, the NWRWRF issued Wastewater Discharge Permit 01-001 to the C&F Packing Co., Inc. ("C&F Packing") This permit was revised on May 1, 2003, and is the current wastewater discharge permit for the C&F Packing facility.

The permit contains numerous monitoring and reporting requirements, and also details surcharges for effluent concentrations of various pollutants that exceed local limits. C&F Packing has complied with the monitoring and reporting requirements of its permit. The permit contains several local limits for various pollutants. Effluents from C&F Packing have, on occasion, exceeded the local limits, and consequently C&F Packing has paid surcharges to the NWRWRF for the additional treatment of wastewater required.

Pre-enforcement Summary

On November 1, 2004, the Illinois Environmental Protection Agency ("Illinois EPA") issued Violation Notice W-2004-00568 to C&F Packing Company, alleging three violations of the Illinois Environmental Protection Act (the "Act") and its underlying regulations. The alleged violations were as follows:

1. The first alleged violation was for pass through/interference, where C&F Packing was alleged to have discharged high concentrations of grease that obstructed the sewer line and caused a slug load to the Fox Lake Water Reclamation Facility. The Illinois EPA, citing sections 12(a) and 12(h) of the Act and 35 IAC 307.1101(a), stated "[n]o person shall introduce pollutants which interfere with the operation or performance of the POTW."
2. The second alleged violation was for system reliability, with the Illinois EPA requiring that C&F Packing review its pretreatment procedures and equipment, and correct the deficiencies. The Illinois EPA, citing section 12(a) of the Act and 35 IAC 306.102, stated "[a]ll treatment works and associated facilities shall be so constructed and operated as to minimize violations of applicable standards."
3. The third violation was for C&F Packing's alleged failure to construct a wastewater treatment facility as it was permitted. Citing section 12(b) of the

Act and Condition 3 of its Permit No. 2002-EN-0089-1, the Illinois EPA stated that C&F Packing should "[t]ake the appropriate actions to assure that the pretreatment system conforms with the plans and specifications that were submitted...."

In the Violation Notice, the Illinois EPA requested that C&F Packing submit a written response, and further explained that the response would constitute a Compliance Commitment Agreement ("CCA"). The CCA was due within 45 days of receipt of the Violation Notice. In lieu of responding to the Violation Notice with a written response, C&F Packing requested a meeting with the Illinois EPA to discuss the alleged violations. The meeting was held on December 21, 2004. Following the meeting, the Illinois EPA advised C&F Packing that the CCA would be due in 21 days, or on January 11, 2005.

Compliance Activities

C&F Packing is presently in compliance with its permit and the Act. There is no continuation of any of the events which gave rise to the Illinois EPA's allegations in the Violation Notice.

The first violation alleged that a slug load observed at the NWRWRF originated from C&F Packing. The second violation alleged a lack of reliability based on failure to use of proper procedures to run the pretreatment process. The incident which gave rise to these alleged violations was a control equipment failure which caused the primary treatment tank to overflow. As discussed in C&F Packing's September 13, 2004 letter to the NWRWRF, C&F Packing has taken the following recent actions to improve the operations at its pretreatment facility:

1. An employee has been placed on third shift to watch and relay any information on equipment failure, spills, and any other problems that may occur.
2. All devices have been electronically and mechanically checked for working ability.
3. All equipment that was effected by the spill was replaced.
4. Daily checks are performed on all overflow and containment devices.
5. All three shifts are now monitored by maintenance personnel.

Additionally, C&F Packing has retained the Dober Group to oversee the pretreatment process at the facility. A letter of engagement is attached hereto as Exhibit 1. The scope of the engagement is as follows:

1. The Dober Group has been retained by C&F Packing to ensure that the wastewater treatment operations are running effectively and safely.

2. The Dober Group has completed site operational training of the operators. The training covered all aspects of wastewater treatment operations including chemical handing and application, equipment operations, safety, spill containment and procedures, compliance monitoring, and system trouble shooting.
3. The Dober Group completes monthly service calls at the facility, which includes an assessment and review of the overall level of training.

The plant has also taken steps to ensure that it has an adequate supply of necessary parts and materials to allow for continuous operations in compliance with its permit.

The third violation alleged that the present configuration of the pretreatment system does not conform to the specifications provided in the Construction Permit previously issued to C&F Packing. The discrepancies between the actual pretreatment process and what was permitted are as follows:

1. The current permit states that there is a 1,900 gallon sump/surge tank at the beginning of the wastewater treatment system to which all the incoming wastewater is directed. The wastewater was then pumped from the sump tank to the 18,000 gallon equalization/gravity separator tank. Currently, all the incoming wastewater is fed directly to the 18,000 gallon equalization/gravity separator tank via gravity. The 1,900 gallon tank has been eliminated.
2. The current permit states that there are three (3) 5,000 gallon sludge holding tanks. There are actually four (4) 8,000 gallon sludge holding tanks.
3. The flow schematic submitted with the application for Permit Number 2002-EN-0089-1 depicted the 18,000 gallon equalization/gravity separator tank as being circular. The tank is actually rectangular.
4. The flow schematic submitted with the application for Permit Number 2002-EN-0089-1 incorrectly stated that the Krofta Dissolved Air Flootation Clarifier had a volume of 18,000 gallons.

C&F Packing has prepared a Supplemental Permit Application, which is attached hereto as Exhibit 2. The proposed revisions accurately reflect the configuration of the pretreatment facility. The pretreatment system as designed is sufficient to ensure that C&F Packing's effluent will not cause violations of the NWRWRF's NPDES Permit.

Respectfully submitted,

By: 
Dennis Olson, President of C&F Packing Co., Inc.


Date

Exhibit 1: Dober Group Retention Letter



December 20, 2004

Mr. Martin Glab
Plant Engineer
C&F Packing Company
515 Park Ave
Lake Villa, IL 60046-0209

Dear Mr. Glab,

The purpose of this letter is to confirm Dober Group as your wastewater treatment chemical supplier and consultant. As part of our combined team effort to assure your wastewater treatment operations are running as effective and safe as possible, we have conducted on site operational training with your operators.

This training class was conducted with Mr. Greg Rymer, Mr. Martin Cortez and Mr. Terry Donegian. Mr. Greg Rymer is a certified State of Illinois Class K operator for your facility.

Training covered all aspects of your wastewater treatment operations including but not limited to chemical handling and application, equipment operations, safety, spill containment and procedures, compliance monitoring and system trouble shooting. As part of our overall service to you, this level of training is ongoing and is reviewed and assessed as part of our monthly service calls to your facility.

Thank you for your time and cooperation. If you should have any questions, please do not hesitate to contact me.

Sincerely,

Tony Weisner
Director Business Development
Water Treatment Division

Exhibit 2: Supplemental Water Pollution Control Permit Application

(page 1 of 2)

Illinois Environmental Protection Agency
Permit Section, Division of Water Pollution Control
P.O. Box 19276
Springfield, IL 62794-9276
Application For Permit Or Construction Approval
WPC-PS-1

For IEPA Use:

1. Name and Location: C & F PACKING COMPANY, INC., 515 PARK AVENUE, LAKE VILLA, IL 60046
Name of Project: C & F Packing Company Supplemental Permit Application to revise IEPA Permit Number 2002-EN-0089-1

Municipality or Township: LAKE VILLA County: LAKE

2. Brief Description of Project: Pretreatment Equipment for Wastewater Source which Processes Cooked Meats to Produce Pizza
Toppings and Soup Bases, Pretreatment Equipment Includes Equalization Tank and Dissolved Air Flootation Gravity Separator.

3. Documents Being Submitted: If the project involves any of the items listed below, submit the corresponding schedule, and check the appropriate spaces.

Table with 2 columns: Project type and status. Rows include Private Sewer Connection/Extension, Sewer Extension Construct Only, Sewage Treatment Works, Excess Flow Treatment, Lift Station/Force Main, Sludge Disposal, Spray Irrigation, Septic Tanks, Industrial Treatment Pretreatment, Waste Characteristics, Erosion Control, and Trust Disclosure.

Plans: - Title _____ Number of Pages: _____

Specifications: Title _____ Number of Books/Pages: _____

Other Documents (Please Specify) _____

4. Land Trust: Is the project identified in item number 1 herein, for which a permit is requested, to be constructed on land which is the subject of a trust? Yes ___ No [X]
If yes, Schedule T (Trust Disclosure) must be completed and item number 7.1.1 must be signed by a beneficiary, trustee, or trust officer.

5. This is an Application for (Check Appropriate Line):
A. Joint Construction And Operating Permit
B. Authorization to Construction (See Instructions) NPDES Permit No. IL00 _____ Issue Date _____
[X] C. Construct Only Permit (Does Not Include Operations)
D. Operate Only Permit (Does Not Include Construction)

6. Certifications and Approvals:
6.1 Certificate by Design Engineer (When required; refer to instructions)
I hereby certify that I am familiar with the information contained in this application, including the attached schedules indicated above, and that to the best of my knowledge and belief such information is true, complete, and accurate. The plans and specifications (specifications other than Standard Specifications or local specifications on file with this Agency) as described above were prepared by me or under my direction.

Engineer: JEFFREY ZAK Name, 062-052241 Registration Number

Firm: SCIENTIFIC CONTROL LABORATORIES, INC.

Address: 3158 SOUTH KOLIN AVENUE

CHICAGO, IL 60623 Phone Number: (773) 254-2400

Signature X [Handwritten Signature]

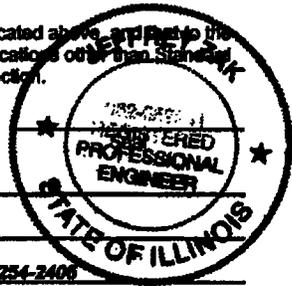
7. Certifications and Approvals for Permit:
7.1 Certificate by Applicant(s)
I/We hereby certify that I/we have read and thoroughly understand the conditions and requirements of this Application, and am/are authorized to sign this application in accordance with the Rules and Regulations of the Illinois Pollution Control Board. I/We hereby agree to conform with the Standard Conditions and with any other Special Conditions made part of this Permit.

7.1.1 Name of Applicant For Permit to Construct: C & F PACKING COMPANY, INC.

515 PARK AVENUE Street, LAKE VILLA City, IL State, 60046 Zip Code

Signature X [Handwritten Signature] DENNIS OLSON Printed Name, 847-245-2000 Phone Number

Title: CO-OWNER Organization: C & F PACKING COMPANY, INC.



(page 2 of 2)

7.1.2 Name Of Applicant For Permit To Own and Operate _____

Street	City	State	Zip Code
--------	------	-------	----------

Signature X _____	Printed Name _____	Phone Number _____
-------------------	--------------------	--------------------

Title _____

7.2 Attested (Required When Applicant Is a Unit of Government)

Signature X _____	Date _____	Title _____
-------------------	------------	-------------

(City Clerk, Village Clerk, Sanitary Clerk, Etc.)

7.3 Applicants from non-governmental applicants which are not signed by the owner, must be signed by a principal executive officer of at least the level of vice president, or a duly authorized representative.

7.4 Certificate By Intermediate Sewer Owner

I hereby certify that (Please check one):

1. The sewers to which this project will be tributary have adequate reserve capacity to transport the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or

2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

Name and location of sewer system to which this project will be tributary: N 4739 a6 / E 608 134Sewer System
OwnerVILLAGE OF LAKE VILLA

65 CEDAR STREET	LAKE VILLA	ILLINOIS	60046
-----------------	------------	----------	-------

Street	City	State	Zip Code
--------	------	-------	----------

Signature X _____	Date _____	Title	MAYOR
-------------------	------------	-------	-------

7.4.1 Additional Certificate By Intermediate Sewer Owner

I hereby certify that (Please check one):

1. The sewers to which this project will be tributary have adequate reserve capacity to transport the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or

2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

Name and location of sewer system to which this project will be tributary: Northwest Interceptor NW SewerSewer System Owner Lake County Public Works

650 Winchester Road	Libertyville	Illinois	60048
---------------------	--------------	----------	-------

Street	City	State	Zip Code
--------	------	-------	----------

Signature X _____	Date _____	Title _____
-------------------	------------	-------------

7.5 Certificate By Waste Treatment Works Owner

I hereby certify that (Please check one):

1. The waste treatment plant to which this project will be tributary has adequate reserve capacity to treat the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or

2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

I also certify that the industrial waste discharges described in the application is capable of being treated by the treatment works.

Name and location of waste treatment works to which this project is tributary: NWR WRFTreatment Works Owner VILLAGE OF FOX LAKE

200 INDUSTRIAL DRIVE	FOX LAKE	ILLINOIS	60020
----------------------	----------	----------	-------

Street	City	State	Zip Code
--------	------	-------	----------

Signature X _____	Date _____	Title _____
-------------------	------------	-------------

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

FOR IEPA USE:
LOG #
DATE RECEIVED

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, Illinois 62794-9276

SCHEDULE G SLUDGE DISPOSAL & UTILIZATION

1. Name of Project C & F Packing Company Supplemental Permit Application to Revise IEPA Permit Number 2002-EN-0089-1

2. General Information

2.1 Source(s) Wastewater from the Cleaning and Sanitation of Meat Processing Equipment

2.2 Production Volume per year Oil = 312,000 lbs Tons per year Oil = 166 tpy
Sludge = 624,000 lbs Sludge = 312 tpy

2.3 Sludge to be disposed of is: Liquid Dry _____

2.4 Sludge is: Aerobically digested _____ Anaerobically digested _____ Heat anaerobically digested _____ Raw _____ Chemically Stabilized _____

Composted _____ Wastewater Lagoon _____ WTP Lime _____ WTP Alum _____ WTP Iron _____ Other If other, describe Oil/Grease/Sludge

Mixture _____ If mixture, describe _____

2.5 Is the sludge defined as hazardous by State or Federal Law? _____ YES NO. If yes, basis _____

2.6 Is sludge to be stored on the STP site? _____ YES NO. If yes, type of storage, lagoon _____ storage tank _____ other _____

If other, describe _____ capacity of storage, _____ cu. ft.

2.7 Sludge Hauling

2.7.1 Name(s), address(es) and Illinois Transporters I.D. Numbers SLUDGE: BYTEC, 1037 8TH STREET, MONROE, WI 53566 (ID #2931)

OIL: ANAMEX, 605 BASSETT ST., DEFOREST, WI 53532

2.7.2 For industrial generators, has Illinois Generator Number and Authorization Number been issued? _____ YES NO. If no, contact the Division of Land Pollution Control

Illinois Generator ID Number 0970045054

Authorization Number NA

3. Methods of Sludge Disposal and/or Utilization

3.1 Land Application

3.1.1 Indicate the number of dry tons of sludge per year to be disposed by each of the following methods:

Agricultural land _____, Commercial Fertilizer Production , Dedicated Land Disposal _____, Disturbed Land Reclamation _____, Silviculture _____,

Horticultural Lands _____, Public Distribution _____, Other _____ If other, specify _____

3.1.2 Sludge Disposal Site Location. Provide a map (USGS Quadrangle map or plat map) showing location.

Name of USGS Quadrangle (7.5 or 15 minute) or plat map All Sludge is sent to Bytec of Monroe, WI.

3.1.3 Provide soil survey map and soil description for disposal site. Identify name of soil survey and map sheet number for each soil survey map provided.

* All 312 tpy of sludge is hauled away by Bytec and used to make fertilizer

3.1.4 Is sludge to be stored at disposal site? YES NO. If yes, describe and state the storage volume _____ cubic feet

3.1.5 Provide a copy of sludge user information sheet and completed, signed copies for any known users.

3.1.6 In a narrative description provide operation practices and design features to prevent ground and/or surface water pollution, portable water supply wellhead protection and other buffer distances, calculations supporting storage capacity, total acres available, soil characteristics, operational contingencies, etc.

All sludge is sent to Bytec of Monroe, WI

3.1.7 Submit calculations of sludge application rate for agronomic rate, organic loading, and metal loading rate.

3.2 Landfilling

NA

3.2.1 Sanitary Landfill Special Waste Landfill Hazardous Waste Landfill Other If other, specify _____

3.2.2 Name and Location of Landfill(s) _____

3.2.3 IEPA Permit Number(s) _____ ; _____ ;

3.3 Incineration

NA

3.3.1 Name and Location _____

3.3.2 IEPA Permit Number(s) _____ ; _____ ;

3.3.3 Ultimate Disposal of Incinerator Residue _____

*****OTHER: Oil is sold to & hauled by a rendering company, Anamex of Deforest WI, which sells the rendered material to companies who manufacture cosmetic products.***

4. Sludge Characteristics

Submit complete analyses of sludge characteristics in mg/kg dry wt. basis unless otherwise indicated. The analyses shall be performed unless the sludge is disposed of by incineration or at an off-site landfill. Analyses performed shall include but not be limited to the parameters below:

Parameter	Parameter
% TS	Sulfur
% VS	Aluminum (total)
COD mg/l	Arsenic (total)
pH	Barium (total)
BOD5 mg/l	Cadmium (total)
Acidity meq of CaCO3 at pH _____	Cobalt (total)
Alkalinity meq CaCO3 at pH _____	Chromium, hex (total)
Oil and Grease mg/l	Chromium (total)
Phenols mg/l	Copper (total)
Cyanide	Iron (total)
Sulfate (total) mg/l	Mercury (total)
Sulfide (total) mg/l	Manganese (total)
Sodium	Molybdenum (total)
EC mmhos/cm	Nickel (total)
TOC	Lead (total)
Ammonia mg/l	Selenium (total)
Total Kjeldahl Nitrogen mg/l	Vanadium (total)
Phosphorus	Zinc (total)
Potassium	Radium 226 pCi/g
% Volatile Acids, if anaerobically digested	Radium 228 pCi/g
	Other*

*Include results of any hazardous waste characteristics tests performed for: 1) EP Toxicity, 2) Corrosivity, 3) Ignitability, and 4) Reactivity

FOR IEPA USE:
LOG #
DATE RECEIVED

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, IL 62706

SCHEDULE J INDUSTRIAL TREATMENT WORKS CONSTRUCTION OR PRETREATMENT WORKS

1. **NAME AND LOCATION:** C & F PACKING COMPANY, INC., 515 PARK AVENUE, LAKE VILLA, IL 60046
- 1.1 Name of project C & F Packing Company Supplemental Permit Application to Revise IEPA Permit Number 2002-EN-0089-1
- 1.2 Plant Location
- 1.2.1 4 LAKE VILLA 10
Quarter Section Section Township Range P.M.
- 1.2.2 Latitude 42 ° 24 ' 30 " North
Longitude 88 ° 4 ' 30 " West
- 1.2.3 Name of USGS Quadrangle Map (7.5 or 15 Minutes) ANTIOCH (7.5 MINUTES)
2. **NARRATIVE DESCRIPTION AND SCHEMATIC WASTE FLOW DIAGRAM:** (see instructions)
See Appendix A
- 2.1 **PRINCIPAL PRODUCTS:** COOKED PROCESSED MEAT PRODUCTS
- 2.2 **PRINCIPAL RAW MATERIALS:** COOKED MEATS: PORK, BEEF, CHICKEN; PROCESS ADDITIVES INCLUDE SALT, SOY & SPICES
3. **DESCRIPTION OF TREATMENT FACILITIES:**
- 3.1 Submit a flow diagram through all treatment units showing size, volumes, detention times, organic loadings, surface settling rate, weir overflow rate, and other pertinent design data. Include hydraulic profiles and description of monitoring systems.
- 3.2 Waste Treatment Works is: Batch Continuous ; No. of Batches/day No. of Shifts/day 2
- 3.3 Submit plans and specifications for proposed construction.
- 3.4 Discharge is: Existing ; Will begin on
4. **DIRECT DISCHARGE TO:** Receiving Stream Municipal Sanitary Sewer Municipal storm or municipal combined sewer . If the receiving stream or storm sewer indicated complete the following:
Name of receiving stream ; tributary to
tributary to ; tributary to
5. Is the treatment works subject to flooding? If so, what is the maximum flood elevation of record (in reference to the treatment works data) and what provisions have been made to eliminate the flooding hazard? NO
6. **APPROXIMATE TIME SCHEDULE:** Estimated construction schedule
- Start of Construction 09/02/02 : Date of Completion 09/20/02
Operation Schedule NA : Date Operation Begins 09/20/02
100% design load to be reached by year NA

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

- 7.1 Design population equivalent (one population equivalent is 100 gallons of wastewater per day, containing 0.17 pounds of BOD₅ and 0.20 pounds of suspended solids;

BOD 5800 (Actual Maximum); Suspended Solids 1570 (Actual Maximum); Flow 2160 (Actual Maximum)

- 7.2 Design Average Flow Rate 175 gpm ; 252,000 gpd (Based on 24 hours per day) MGD.
 7.3 Design Maximum Flow Rate 175 gpm ; 252,000 gpd (Based on 24 hours per day) MGD.
 7.4 Design Minimum Flow Rate 0 MGD.
 7.5 Minimum 7-day, 10-year low flow NA cfs MGD.
 Minimum 7-day, 10-year flow obtained from NA
 7.6 Dilution Ratio NA ; _____

8. FLOW TO TREATMENT WORKS (if existing):

- 8.1 Flow (last 12 months)

8.1.1 Average Flow NA MGD

8.1.2 Maximum Flow NA MGD

- 8.2 Equipment used in determining above flows _____

9. Has a preliminary engineering report for this project been submitted to this Agency for Approval?

YES NO If so, when was it submitted and approved. Date Submitted _____
 Certification # _____
 Dated _____

10. List Permits previously issued for the facility: 2002-EN-0089, 2002-EN-0089-1

11. Describe provisions for operation during contingencies such as power failures, flooding, peak loads, equipment failure, maintenance, shut-downs and other emergencies.

The Pretreatment system will not operate under any of the above conditions.

12. Complete and submit Schedule G if sludge disposal will be required by this facility.

13. WASTE CHARACTERISTICS: Schedule N must be submitted.

14. TREATMENT WORKS OPERATOR CERTIFICATION: List names and certification numbers of certified operators:

Greg Rymer

FOR IEPA USE:
LOG #
DATE RECEIVED:

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

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, IL 62706

SCHEDULE N WASTE CHARACTERISTICS

1. Name of Project C & F Packing Company Supplemental Permit Application to Revise IEPA Permit Number 2002-EN-0089-1

	EXISTING	PROPOSED-DESIGN
2.1 Average Flow (gpd)	<u>144,000</u>	<u>252,000*</u>
2.2 Maximum Daily Flow (gpd)	<u>216,000</u>	<u>252,000*</u>

2.3 TEMPERATURE * based on a 24 hour work day

Time of year	Ave. Intake Temp. F	Ave. Effluent Temp. F	Max. Intake Temp. F	Max. Effluent Temp. F	Max Temp Outside Mixing Zone F
SUMMER	<u>NA</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
WINTER	<u>NA</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

2.4 Minimum 7-day, 10-year flow: NA cfs MGD.

2.5 Dilution Ratio: NA ;

2.6 Stream flow rate at time of sampling NA cfs MGD.

3. CHEMICAL CONSTITUENT Existing Permitted Conditions ; Existing conditions X; Proposed Permitted Conditions
Type of sample: grab (time of collection); composite (Number of samples per day)
(see instructions for analyses required)

Constituent	RAW WASTE (mg / l)	TREATED EFFLUENT Avg. (mg / l) Max.	UPSTREAM DOWNSTREAM SAMPLES
Ammonia Nitrogen (asN)	NTF	50.0	NA
Arsenic (Total)	NTF	NTF	NA
Barium	NTF	NTF	NA
Boron	NTF	NTF	NA
BOD ₅	> 1000	550	NA
Cadmium	NTF	NTF	NA
Carbon Chloroform Extract	NTF	NTF	NA
Chloride	NTF	NTF	NA
Chromium (total hexavalent)	NTF	NTF	NA
Chromium (total trivalent)	NTF	NTF	NA
Copper	NTF	NTF	NA
Cyanide (total)	NTF	<0.03	NA
Cyanide (readily released 150°F & pH 4.5)	NTF	NTF	NA
Dissolved Oxygen	NTF	NTF	NA
Fecal Coliform	NTF	NTF	NA

	RAW WASTE (mg / l)	TREATED EFFLUENT Avg. (mg / l) Max.	UPSTREAM (mg / l)	DOWNSTREAM SAMPLES (mg / l)
Fluoride	NTF	NTF	NA	NA
Hardness (as CaCO ₃)	NTF	NTF	NA	NA
Iron (total)	NTF	0.50	NA	NA
Lead	NTF	NTF	NA	NA
Manganese	NTF	NTF	NA	NA
MBAS	NTF	NTF	NA	NA
Mercury	NTF	NTF	NA	NA
Nickel	NTF	NTF	NA	NA
Nitrates (as N)	NTF	NTF	NA	NA
Oil & Grease (hexane solubles or equivalents)	300	<50	NA	NA
Organic Nitrogen (as N)	NTF	NTF	NA	NA
pH	<2.0	7-9	NA	NA
Phenols	NTF	NTF	NA	NA
Phosphorous (as P)	NTF	15.0	NA	NA
Radioactivity	NTF	NTF	NA	NA
Selenium	NTF	NTF	NA	NA
Silver	NTF	NTF	NA	NA
Sulfate	NTF	NTF	NA	NA
Suspended Solids	1000	175	NA	NA
Total Dissolved Solids	**	**	NA	NA
Zinc	NTF	NTF	NA	NA
Others				
** Treatment System not designed to remove TDS				

APPENDIX A

Narrative Description for C & F Packing Company, Inc.

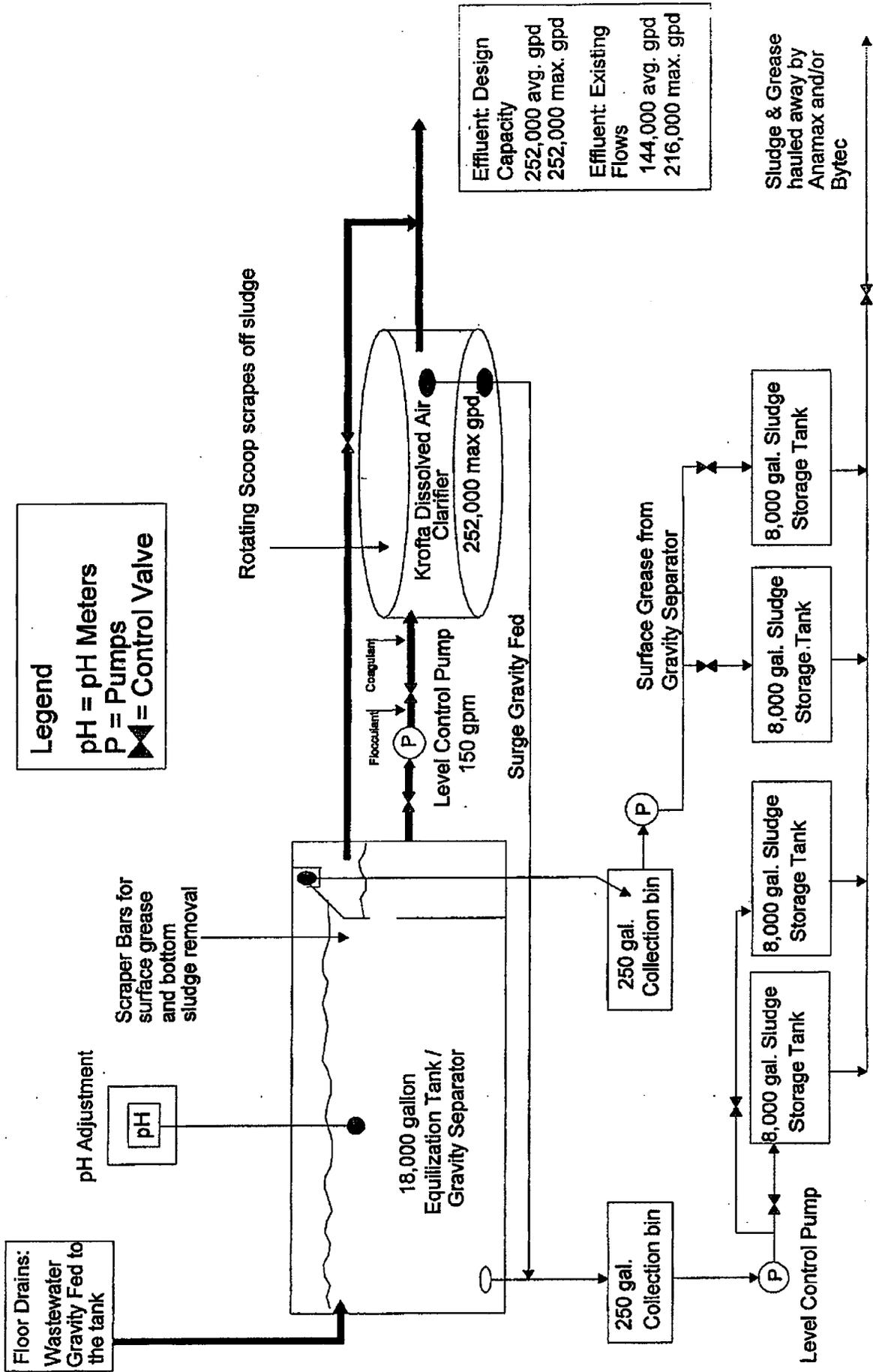
Wastewater from the cooked meat processes enter the pretreatment process through stainless steel floor drains. Strainer baskets in the floor drains collect the bulk of the solid material. The strainer baskets are emptied manually into 55 gallon barrels. These barrels are refrigerated until they are emptied and hauled off-site. The wastewater is gravity fed from the strainer baskets into an 18,000 Alloy Gravity Separator/Equalization Tank that is equipped with scraper bars and mixers where the pH will be adjusted to 7-9. The pH adjusted wastewater is then pumped to an 10 foot diameter Krofta DAF (dissolved air floatation) at a maximum rate of 150 gallons per minute. Coagulant and flocculent are added to the wastewater in the entrance pipe to the Krofta DAF in order to facilitate in the separation of fats, oils and greases from the wastewater. Sludge (grease) is scraped and removed from the top of the DAF and the bottom of the Gravity Separator. This sludge is gravity fed to a 250 gallon collection bin and then pumped to one of two 8000 gallon grease/sludge storage tanks. Additional oil/grease is scraped off the top of the Gravity Separator and fed to a second 250 gallon collection bin and then pumped to one of two additional 8000 gallon grease/oil storage tanks. There are a total of four 8000 gallon storage tanks. The sludge and oil are hauled away. The sludge grease is hauled away by Bytec which uses the sludge to manufacture fertilizer. The oil is hauled away by a rendering company, Anamax, which sells the rendered material to be used in the manufacturing of cosmetic products. See Appendix B for sludge composition.

The wastewater from the DAF is discharged to the sewer at a rate of approximately 100 gpm, 144,000 gpd, based on a 24 hour day (average); 150 gpm, 216,000 gpd based on a 24 hour day (maximum).

The system is designed to handle a maximum of 175 gpm max, 252,000 gpd, based on a 24 hour day. This maximum design flowrate is based on the Krofta DAF being the limiting piece of equipment in the system. The supplier-specified maximum design flowrate for the 10 foot-diameter Krofta DAF is 263 gpm. Based on our experience with Krofta, the true maximum design flowrate for the Krofta is about 66% of the supplier-specified design flowrate or, in this case, 175 gpm.

C & F Packing Company, Inc.
 515 Park Avenue
 Lake Villa, IL 60046

Wastewater Treatment System



APPENDIX B

12/15/2004 13:41 6083288204

BYTEC INC

PAGE 01



Environmental, Industrial & Food Analytical Services

Bytec,
 Inc.
 1037 - 8th Avenue West
 Monroe, Wisconsin 53566

January 23, 2004

Project #04A0363

Attn: Gregg Weaver

**SLUDGE
 ANALYSIS**

Sample Identification: C&P 1-14-04 10:00

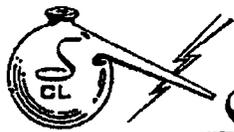
S-F Lab No.: 04A0363-001

DNR Param #	Parameter Name	Wet Wgt. Result % wt.	Wet Wgt. Detect Limit	Sample Total Solids	Dry Wgt. Result % wt.	Dry Wgt. Detect Limit	Date Digested/ Extracted	Date Analyzed	Method #
00500	Total Solids	4.01	0.01	—	—	—	1/18/04	1/18/04	160 3
00525	Total Kjeldahl Nitrogen	0.153	0.002	4.01	3.62	0.05	1/18/04	1/19/04	261 3
00610	Ammonium Nitrogen	0.0128	0.001	4.01	0.314	0.025	1/18/04	1/19/04	360 2
00665	Total Phosphorus	0.063	0.001	4.01	1.57	0.02	1/18/04	1/19/04	365 3
00937	Total Potassium Chloride	0.0338 0.0478	0.0001 0.0007	4.01	0.845 1.187	0.002 0.017	1/18/04 1/18/04	1/19/04 1/23/04	SW846-10108 300 0
	Biochemical Oxygen Demand	1.884	0.01	4.01	41.50	0.25	1/18/04	1/23/04	SM52.10B

Gary G. Geipel
 Gary G. Geipel
 Senior Analyst

6125 West National Avenue, P.O. Box 14513, Milwaukee, WI 53214
 (414) 475-6700 FAX: (414) 475-7216 www.sflabs.com
 Toll-Free: 800-300-6700

APPENDIX C



Scientific
CONTROL LABORATORIES, INC.
 TESTING — CONSULTING

Kevin Wasag
 Laboratory Manager
 3158 S. Kolin Ave.
 Chicago IL 60623-4889
 Phone: 773-254-2406
 Extension 19
 FAX: 773-254-6661
 E-mail: kwasag@sciweb.com
 www.sciweb.com

MR. DENNIS OLSEN
 C & F PACKING COMPANY
 551 PARK AVENUE
 LAKE VILLA, IL 60046

Project Type: Wastewater Analysis
 Project Inception: 02-04-04
 Report Date: 02-13-04
 Project Number: 2004-020055
 Page Number: Page 1 of 3

IDENTIFICATION OF MATERIAL:

Eight (8) wastewater samples, taken by our personnel, identified as:

STATION 5 COMPOSITES

02/02-03/04 (2:15PM-1:15PM)
 02/03-04/04 (3:25PM-12:25PM)
 02/04-05/04 (1:20PM-12:20PM)
 02/05-06/04 (1:20PM-11:20AM)

STATION 5 GRABS

02-03-04 (3:35PM)
 02-04-04 (1:30PM)
 02-05-04 (1:30PM)
 02-06-04 (12:00PM)

PROCEDURE:

All analyses were performed in accordance with the EPA/IEPA approved test procedures as specified in 40 CFR, part 136, and certified to meet the NELAP requirements, unless otherwise noted. Scientific Control Labs, Inc., is an accredited laboratory for the analysis of potable water, wastewater, and hazardous waste (IEPA Cert. #100183), and an accredited laboratory for wastewater analysis (State of Washington Cert. #C165, State of Wisconsin DNR #998091930). This means we have a quality control program in effect and that this quality control program is monitored and reviewed annually by the certifying agencies. Sampling was conducted in accordance with the method specified in 40 CFR part 403. All samples were received in good condition unless otherwise noted.

RESULTS:

Concentration in ppm (mg/L)

<u>STATION 5 COMPOSITES:</u>	<u>02-02 TO</u>	<u>02-03 TO</u>	<u>02-04 TO</u>	<u>02-05 TO</u>	<u>Daily Maximum</u>
	<u>02-03-04</u>	<u>02-04-04</u>	<u>02-05-04</u>	<u>02-06-04</u>	<u>Local Limits</u>
BIOCHEMICAL OXYGEN DEMAND	545	355	307	630	3000
TOTAL SUSPENDED SOLIDS	92.0	74.0	134	138	1500
IRON	0.70	0.26	<0.20	<0.20	10.00
TOTAL PHOSPHORUS	21.0	6.50	13.5	9.50	150
CHEMICAL OXYGEN DEMAND	1420	646	616	1240	6000
TOTAL DISSOLVED SOLIDS	3040	2150	1850	2400	2500
AMMONIA NITROGEN	3.9	6.1	21.0	25.4	150

<u>STATION 5 GRABS:</u>	<u>3:35PM</u>	<u>1:30PM</u>	<u>1:30PM</u>	<u>12:00PM</u>	<u>Daily Maximum</u>
	<u>02-03-04</u>	<u>02-04-04</u>	<u>02-05-04</u>	<u>02-06-04</u>	<u>Local Limits</u>
FATS, OILS & GREASES	6.6	5.6	<5.0	<5.0	50.00
TOTAL CYANIDE	<0.03	<0.03	<0.03	<0.03	0.03
PH	6.3	7.0	7.0	7.3	6.0-9.0

Note: It is our policy to keep copies of reports for five years. The data is kept on file for up to five years. Samples (if applicable) are kept for three weeks. Samples that are hazardous will be returned to the client. If this policy poses a difficulty, please contact us to make other arrangements. If reproduced, our report, must be reproduced completely. Any unauthorized alteration of this report invalidates the content.



Order Number: 2004-020055
 Project Type: Wastewater Analysis
 Project Inception: 02-04-04
 Report Date: 02-13-04
 Page Number: Page 2 of 3

<u>METHOD OF ANALYSIS</u>	<u>Method</u>	<u>Date</u>	<u>Detection Limit</u>	<u>Analyst</u>
STATION 5 COMPOSITES, 02/02-03/04 (2:15PM-1:15PM)				
<i>Received on: 02-03-04 Collected on: 02-03-04</i>				
IRON	SM-3120	02-10-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	02-09-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	02-05-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	02-04-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	02-06-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	02-06-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	02-09-04	1.0mg/L	SW

STATION 5 GRAB, 02-03-04 (3:35PM)				
<i>Received on: 02-03-04 Collected on: 02-03-04</i>				
FATS, OILS & GREASES	SM-5520-B	02-05-04	5.0mg/L	ID
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	02-04-04	0.05mg/L	AT
PH	SM-4500H+B	02-03-04	0.1	CG

STATION 5 COMPOSITES, 02/03-04/04 (3:25PM-12:25PM)				
<i>Received on: 02-04-04 Collected on: 02-04-04</i>				
IRON	SM-3120	02-10-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	02-09-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	02-05-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	02-05-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	02-06-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	02-06-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	02-11-04	1.0mg/L	SW

STATION 5 GRAB, 02-04-04 (1:30PM)				
<i>Received on: 02-04-04 Collected on: 02-04-04</i>				
FATS, OILS & GREASES	SM-5520-B	02-05-04	5.0mg/L	ID
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	02-05-04	0.05mg/L	AT
PH	SM-4500H+B	02-04-04	0.1	CG

STATION 5 COMPOSITES, 02/04-05/04 (1:20PM-12:20PM)				
<i>Received on: 02-05-04 Collected on: 02-05-04</i>				
IRON	SM-3120	02-10-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	02-11-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	02-09-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	02-09-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	02-06-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	02-06-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	02-11-04	1.0mg/L	SW

STATION 5 GRAB, 02-05-04 (1:30PM)				
<i>Received on: 02-05-04 Collected on: 02-05-04</i>				
FATS, OILS & GREASES	SM-5520-B	02-09-04	5.0mg/L	ID
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	02-11-04	0.05mg/L	AT
PH	SM-4500H+B	02-05-04	0.1	CG

PH was analyzed immediately upon receipt at the laboratory.



Order Number: 2004-020055
 Project Type: Wastewater Analysis
 Project Inception: 02-04-04
 Report Date: 02-13-04
 Page Number: Page 3 of 3

<u>METHOD OF ANALYSIS</u>	<u>Method</u>	<u>Date</u>	<u>Detection Limit</u>	<u>Analyst</u>
STATION 5 COMPOSITES, 02/05-06/04 (1:20PM-11:20AM)				
<i>Received on: 02-06-04 Collected on: 02-06-04</i>				
IRON	SM-3120	02-10-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	02-11-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	02-09-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	02-09-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	02-11-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	02-06-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	02-11-04	1.0mg/L	SW

STATION 5 GRAB, 02-06-04 (12:00PM)*Received on: 02-06-04 Collected on: 02-06-04*

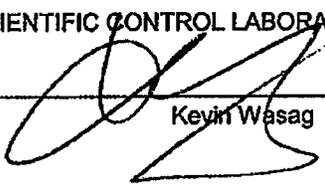
FATS, OILS & GREASES	SM-5520-B	02-11-04	5.0mg/L	ID
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	02-11-04	0.05mg/L	AT
PH	SM-4500H+B	02-06-04	0.1	CG

PH was analyzed immediately upon receipt at the laboratory.

Respectfully submitted,

SCIENTIFIC CONTROL LABORATORIES, INC.

By


 Kevin Wasag

KW: av



Kevin Wasag
 Laboratory Manager
 3158 S. Kolin Ave.
 Chicago IL 60623-4889
 Phone: 773-254-2406
 Extension 19
 FAX: 773-254-6661
 E-mail: kwasag@scweb.com
www.scweb.com

MR. DENNIS OLSEN
 C & F PACKING COMPANY
 551 PARK AVENUE
 LAKE VILLA, IL 60046

Project Type: Wastewater Analysis
 Project Inception: 06-15-04
 Report Date: 06-28-04
 Project Number: 2004-060238
 Page Number: Page 1 of 3

IDENTIFICATION OF MATERIAL:

Eight (8) wastewater samples, taken by our personnel, identified as:

STATION 1A COMPOSITES

06/14-15/04 (11:00AM-10:00AM)
 06/15-16/04 (11:00AM-10:00AM)
 06/16-17/04 (10:40AM-9:40AM)
 06/17-18/04 (10:00AM-9:00AM)

STATION 1A GRABS

06-15-04 (10:45AM)
 06-16-04 (10:30AM)
 06-17-04 (10:50AM)
 06-18-04 (10:40AM)

PROCEDURE:

All analyses were performed in accordance with the EPA/EPA approved test procedures as specified in 40 CFR, part 136, and certified to meet the NELAP requirements, unless otherwise noted. Scientific Control Labs, Inc., is an accredited laboratory for the analysis of potable water, wastewater, and hazardous waste (IEPA Cert. #100183), and an accredited laboratory for wastewater analysis (State of Washington Cert. #C165, State of Wisconsin DNR #998091930). This means we have a quality control program in effect and that this quality control program is monitored and reviewed annually by the certifying agencies. Sampling was conducted in accordance with the method specified in 40 CFR part 403. All samples were received in good condition unless otherwise noted.

RESULTS:

Concentration in ppm (mg/L)

<u>STATION 1A COMPOSITES:</u>	<u>06-14 TO</u>	<u>06-15 TO</u>	<u>06-16 TO</u>	<u>06-17 TO</u>	<u>Daily Maximum</u> <u>Local Limits</u>
	<u>06-15-04</u>	<u>06-16-04</u>	<u>06-17-04</u>	<u>06-18-04</u>	
IRON	0.83	0.80	0.58	0.56	10.00
BIOCHEMICAL OXYGEN DEMAND	960	500	575	535	3000
TOTAL SUSPENDED SOLIDS	134	174	288	388	1500
TOTAL DISSOLVED SOLIDS	3480	2010	3430	3690	2500
CHEMICAL OXYGEN DEMAND	1480	739	924	1110	6000
AMMONIA NITROGEN	43.6	76.2	116	132	150
TOTAL PHOSPHORUS	14.2	10.4	19.0	21.8	150

STATION 1A GRABS:

	<u>06-15-04</u>	<u>06-16-04</u>	<u>06-17-04</u>	<u>06-18-04</u>	<u>Daily Maximum</u> <u>Local Limits</u>
	FATS, OILS & GREASES	<5.0	<5.0	8.8	
TOTAL CYANIDE	<0.025	<0.025	<0.025	<0.025	0.03
PH	6.2	7.1	7.2	8.0	6.0-9.0

Note: It is our policy to keep copies of reports for five years. The data is kept on file for up to five years. Samples (if applicable) are kept for three weeks. Samples that are hazardous will be returned to the client. If this policy poses a difficulty, please contact us to make other arrangements. If reproduced, our report, must be reproduced completely. Any unauthorized alteration of this report invalidates the content.



Order Number: 2004-060238
 Project Type: Wastewater Analysis
 Project Inception: 06-15-04
 Report Date: 06-28-04
 Page Number: Page 2 of 3

<u>METHOD OF ANALYSIS</u>	<u>Method</u>	<u>Date</u>	<u>Detection Limit</u>	<u>Analyst</u>
STATION 1A COMPOSITES, 06/14-15/04 (11:00AM-10:00AM)				
<i>Received on: 06-15-04 Collected on: 06-15-04</i>				
IRON	SM-3120	06-21-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	06-20-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	06-17-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	06-17-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	06-21-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	06-17-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	06-17-04	1.0mg/L	AT
STATION 1A GRAB, 06-15-04 (10:45AM)				
<i>Received on: 06-15-04 Collected on: 06-15-04</i>				
FATS, OILS & GREASES	SM-5520-B	06-17-04	5.0mg/L	JC
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	06-17-04	0.025mg/L	AT
PH	SM-4500H+B	06-15-04	0.1	CG
STATION 1A COMPOSITES, 06/15-16/04 (11:00AM-10:00AM)				
<i>Received on: 06-16-04 Collected on: 06-16-04</i>				
IRON	SM-3120	06-21-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	06-21-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	06-17-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	06-17-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	06-21-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	06-17-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	06-17-04	1.0mg/L	AT
STATION 1A GRAB, 06-16-04 (10:30AM)				
<i>Received on: 06-16-04 Collected on: 06-16-04</i>				
FATS, OILS & GREASES	SM-5520-B	06-22-04	5.0mg/L	JC
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	06-17-04	0.025mg/L	AT
PH	SM-4500H+B	06-16-04	0.1	CG
STATION 1A COMPOSITES, 06/16-17/04 (10:40AM-9:40AM)				
<i>Received on: 06-17-04 Collected on: 06-17-04</i>				
IRON	SM-3120	06-21-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	06-22-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	06-21-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	06-21-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	06-21-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	06-24-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	06-18-04	1.0mg/L	AT
STATION 1A GRAB, 06-17-04 (10:50AM)				
<i>Received on: 06-17-04 Collected on: 06-17-04</i>				
FATS, OILS & GREASES	SM-5520-B	06-22-04	5.0mg/L	JC
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	06-18-04	0.025mg/L	AT
PH	SM-4500H+B	06-17-04	0.1	CG

PH was analyzed immediately upon receipt at the laboratory.



Order Number: 2004-060238
 Project Type: Wastewater Analysis
 Project Inception: 06-15-04
 Report Date: 06-28-04
 Page Number: Page 3 of 3

<u>METHOD OF ANALYSIS</u>	<u>Method</u>	<u>Date</u>	<u>Detection Limit</u>	<u>Analyst</u>
STATION 1A COMPOSITES, 06/17-18/04 (10:00AM-9:00AM)				
<i>Received on: 06-18-04</i>		<i>Collected on: 06-18-04</i>		
IRON	SM-3120	06-23-04	0.20mg/L	SW
BIOCHEMICAL OXYGEN DEMAND	SM-5210-B	06-23-04	2.0mg/L	CT
TOTAL SUSPENDED SOLIDS	SM-2540-D	06-21-04	1.0mg/L	CT
TOTAL DISSOLVED SOLIDS	SM-2540-C	06-21-04	1.0mg/L	CT
CHEMICAL OXYGEN DEMAND	EPA 410.1	06-23-04	4.0mg/L	SW
TOTAL PHOSPHORUS	SM-4500P B&E	06-24-04	0.05mg/L	SW
AMMONIA NITROGEN	SM-4500NH3-B/C	06-25-04	1.0mg/L	AT

STATION 1A GRAB, 06-18-04 (10:40AM)*Received on: 06-18-04**Collected on: 06-18-04*

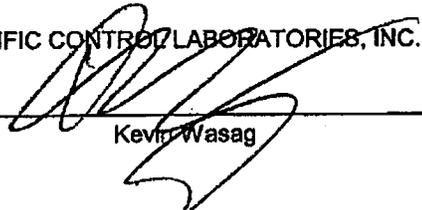
FATS, OILS & GREASES	SM-5520-B	06-22-04	5.0mg/L	JC
CYANIDE-TOTAL	SM-4500CN-C/EPA335.3	06-21-04	0.025mg/L	AT
PH	SM-4500H+B	06-18-04	0.1	CG

PH was analyzed immediately upon receipt at the laboratory.

Respectfully submitted,

SCIENTIFIC CONTROL LABORATORIES, INC.

By


 Kevin Wasag

KW: av

APPENDIX D

09/17/2001 12:08

952-492-3100

ALLOY

PAGE 01/02



Evolving to meet YOUR needs....

ALLOY HARDFACING & ENGINEERING CO., INC.
 90495 JOHNSON MEMORIAL DRIVE
 JORDAN, MN 55352

800-328-8408
952-492-5509
952-492-3100 FAX

17 September 2001

Fax: 773-254-6661

Fax: 2 pages

Scientific Control Laboratories
 3158 South Kolin Avenue
 Chicago, IL 60623

Attn: Joanne Kiepora

cc: Dennis Olson - C & F Packing

Re: Specifications on C & F Packing Gravity Separator Alloy Job #000702

Joanne:

Following please find Alloy's approval drawing which give specifications on the unit including:

- Water inlet location and diameter
- Water outlet locations and diameter
- Solids outlet via 9" diameter "U" trough screw conveyor
- Fats outlet via 9" diameter "U" trough screw conveyor

Regarding water flow, Alloy recommends retention time of (1) hour; however, many customers use 40 to 45 minutes retention time and still get adequate results.

As a result the rated capacity is as follows:

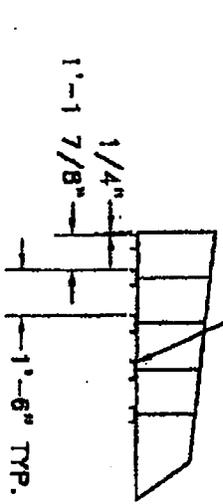
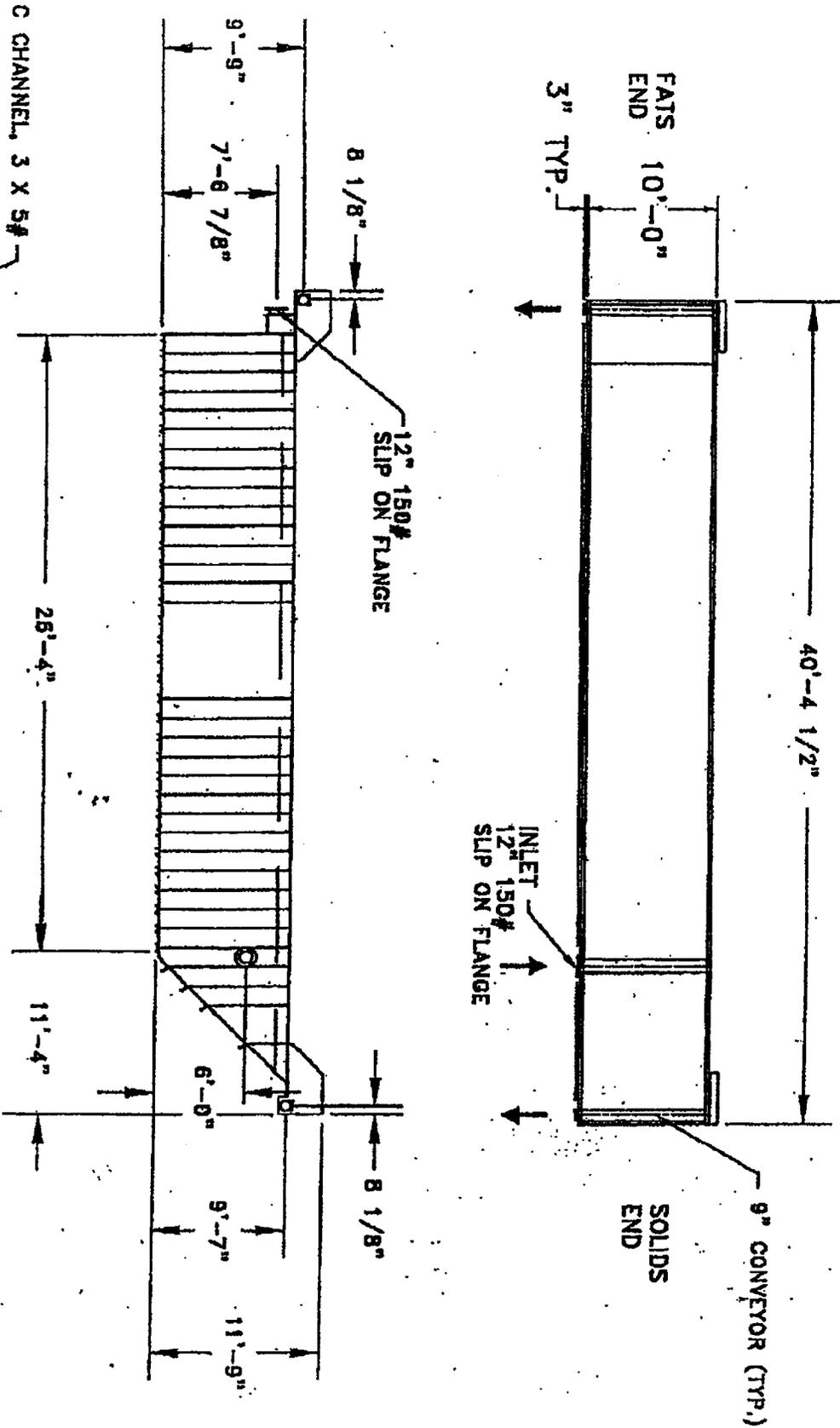
- 1-hour retention - 18,000 gallons per hour or 300 gallons per minute
- 45-minute retention - 24,000 gallons per hour or 400 gallons per minute

If you have any questions or comments or need additional information, please feel free to contact us.

Sincerely,

Paul Rothenberger
 Paul Rothenberger
 Applications Engineer

PR:jk
 Enclosure



REFERENCES

1	ASME	SECTION VIII, DIVISION 1
2	ASME	SECTION VIII, DIVISION 2
3	ASME	SECTION VIII, DIVISION 3
4	ASME	SECTION VIII, DIVISION 4
5	ASME	SECTION VIII, DIVISION 5
6	ASME	SECTION VIII, DIVISION 6
7	ASME	SECTION VIII, DIVISION 7
8	ASME	SECTION VIII, DIVISION 8
9	ASME	SECTION VIII, DIVISION 9
10	ASME	SECTION VIII, DIVISION 10
11	ASME	SECTION VIII, DIVISION 11
12	ASME	SECTION VIII, DIVISION 12
13	ASME	SECTION VIII, DIVISION 13
14	ASME	SECTION VIII, DIVISION 14
15	ASME	SECTION VIII, DIVISION 15
16	ASME	SECTION VIII, DIVISION 16
17	ASME	SECTION VIII, DIVISION 17
18	ASME	SECTION VIII, DIVISION 18
19	ASME	SECTION VIII, DIVISION 19
20	ASME	SECTION VIII, DIVISION 20

REFERENCES

1	ASME	SECTION VIII, DIVISION 1
2	ASME	SECTION VIII, DIVISION 2
3	ASME	SECTION VIII, DIVISION 3
4	ASME	SECTION VIII, DIVISION 4
5	ASME	SECTION VIII, DIVISION 5
6	ASME	SECTION VIII, DIVISION 6
7	ASME	SECTION VIII, DIVISION 7
8	ASME	SECTION VIII, DIVISION 8
9	ASME	SECTION VIII, DIVISION 9
10	ASME	SECTION VIII, DIVISION 10
11	ASME	SECTION VIII, DIVISION 11
12	ASME	SECTION VIII, DIVISION 12
13	ASME	SECTION VIII, DIVISION 13
14	ASME	SECTION VIII, DIVISION 14
15	ASME	SECTION VIII, DIVISION 15
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17	ASME	SECTION VIII, DIVISION 17
18	ASME	SECTION VIII, DIVISION 18
19	ASME	SECTION VIII, DIVISION 19
20	ASME	SECTION VIII, DIVISION 20

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17	ASME	SECTION VIII, DIVISION 17
18	ASME	SECTION VIII, DIVISION 18
19	ASME	SECTION VIII, DIVISION 19
20	ASME	SECTION VIII, DIVISION 20

REFERENCES

1	ASME	SECTION VIII, DIVISION 1
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13	ASME	SECTION VIII, DIVISION 13
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17	ASME	SECTION VIII, DIVISION 17
18	ASME	SECTION VIII, DIVISION 18
19	ASME	SECTION VIII, DIVISION 19
20	ASME	SECTION VIII, DIVISION 20

ALLOY HARDWARE & CONSTRUCTION CO., INC.
 MINNEAPOLIS, MINNESOTA 55408

Alloy Grovly Separator
 Customer Drawing
 18,000 Gd.

CONTRACT NO. 00022201
 DRAWING NO. 00022201

SCALE none SHEET 2

CONTAINS FAX



Evolving to meet YOUR needs....

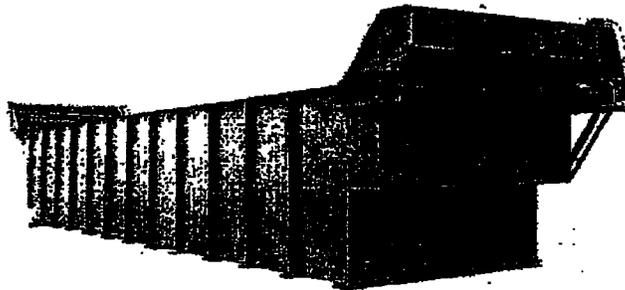
ALLOY HARDFACING & ENGINEERING CO., INC.
90425 JOHNSON MEMORIAL DRIVE
JORDAN, MN 55352

800-328-8408
952-492-5569
952-492-3100 FAX

QUOTATION

C & F PACKING COMPANY, INC.
P.O. Box 667
Elk Grove Village, IL 60009-0667
Attn: Dennis Olson
Fax: 847-228-7050
Phone: 847-228-6300

FOR



ALLOY-design GRAVITY SEPARATOR
MODEL #18080940

Quote#: 00-222R2

DATE: 22 August, 2000

Paul Rothenberger (d)
BY: Paul Rothenberger
Applications Engineer

TERMS:
35% Deposit with Order
55% Net 10 days after shipment
Balance Net

Accepted By: _____

FOB Alloy

Date: ___/___/___



ALLOY HARDFACING & ENGINEERING CO. INC.

20425 JOHNSON MEMORIAL DRIVE JORDAN MN 55352

PHONE: 1-800-328-8408

FAX: 952-492-3100

QUOTATION NUMBER

00-222R2

TO: C & F PACKING CO., INC. – Elk Grove Village, IL
ATTN: Dennis Olson

Date: 22 August, 2000
Page: 1

QUANTITY	ITEM #/DESCRIPTION	INVESTMENT	HP		
	<div data-bbox="300 651 1117 730" style="border: 1px solid black; padding: 5px;"> <p>ALLOY DESIGN CAPACITY SEPARATED Model # 1000-540</p> </div> <p>A. <u>CAPACITY:</u> 18,000 Gallons</p> <p>B. <u>DIMENSIONS:</u></p> <ul style="list-style-type: none"> ◆ Water Depth ◆ Inside Width ◆ Overall Length ◆ Overall Width ◆ Overall Height 1.80 <p>C. <u>TANK ROOFER</u> constructed of 7 Ga. galvanized sheet metal roof panels stiffened with structural members. Minimum slope of 1% for drainage. Incline of 1% for walking eyes.</p> <p>D. <u>BEACH DRIVE</u> 2 1/2" x 6" wood slats, mounted to the tank bottom with 1/2" x 1/2" x 1/2" aluminum washers. The slats are spaced 1/2" apart.</p> <p>E. <u>MAIN DRIVE</u> 1 1/2 HP, TEFC motor with worm gear speed reducer driving head shaft and slave driving solids collecting auger. Head shaft is mounted in ball bearing take-up frames.</p> <p>F. <u>SEPARATE BEACH DRIVE</u>: Special ALLOY-design feature for grease removal, being accomplished by a separate drag on top. The beach skimmer slats pick up the floating fats and transfer same to the 9" discharge U-trough via a separate drive. None of the beach chain slat assemblies "wash over" and/or push the floating product into the effluent.</p> <p>G. <u>BEACH DRIVE</u>: 1/3 HP, TEFC motor with worm gear speed reducer driving head shaft and slave driving fats collecting auger. Head shaft is mounted in ball bearing take-up frames.</p>				

EVOLVING TO MEET YOUR NEEDS...

QUOTATION SUBJECT TO TERMS AND CONDITIONS LISTED ON REVERSE SIDE

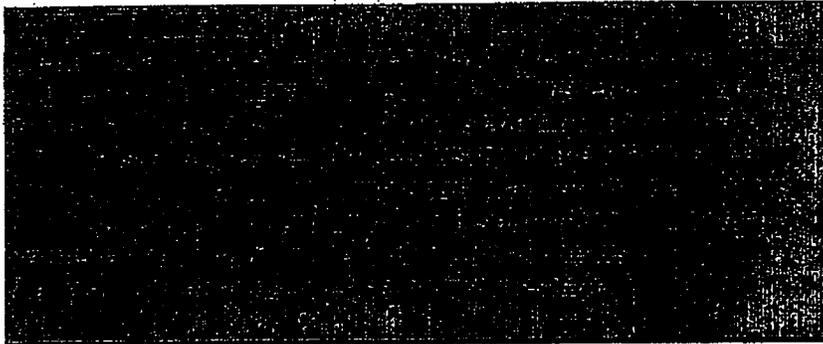
00-222R2

C & F PACKING CO., INC. -- Elk Grove Village, IL
Dennis Olson

22 August, 2000
2

- H. INLET AND OUTLET: - per your requirements; please specify size and orientation when ordering.
- I. INSIDE OF TANK: - epoxy coating on inside of tank.
- J. OWNER/OPERATOR MANUALS: (2) sets included with each Alloy Gravity Separator.
- K. APPROXIMATE SHIPPING WEIGHT: 18,200 lbs.

Delivery lead-time commences upon receipt of purchase order, deposit and signed orientation drawing.



**STARTER CONTROL PANEL OPTIONS
FOR GRAVITY SEPARATOR**

For units WITH aeration up to 25,000 Gallons
(Includes Items A-D + E-G)

- A. (1) Aeration motor starter, 3-phase, with overload, 230 Volt
- B. (1) Motor fuse block, 3-pole, with fuses.
- C. Start/Stop Control Aeration Motor.

00-222R2

**C & F PACKING CO., INC. – Elk Grove Village, IL
Dennis Olson**

**22 August, 2000
3**

SIGNATURE SEPARATION AND RECYCLE SYSTEM

For aerating and recycling Gravity Separator effluent up to 300 GPM into inlet of unit. System designed for installation on a 18,000 gallon ALLOY-design Gravity Separator using 100% recycle.

- A. (1) water pump(s) for recycling up to 300 GPM, each, with mechanical shaft seal, complete with 25 HP, 3 Phase, 230/460 Volt, TEFC motor, base, coupling and coupling guard.
- B. (3) Air Injection PUMPS and control assembly, to include all hand valves, air regulators, air flow meters and fittings; preassembled at factory.
- C. Black iron recirculation water inlet pipe and fitting for field installation on discharge end of ALLOY-design Gravity Separator.
- D. PVC Air-Water distribution pipe assembly with NPT inlet fitting for field installation on inlet end of ALLOY-design Gravity Separator.
- E. (2) Rubber squeegees complete with mild steel backer.
- F. (2) Sets owner manuals.



TOTAL INVESTMENT.....
SYSTEM DISCOUNT.....
GRAND TOTAL INVESTMENT.....

Post-It® Fax Not: 7671 Date 12/17 # of pages 1

To JOSEPH K From TOM LAWRENCE

Co./Dept. Co.

Phone # Phone #

Fax # 773-254-6661 Fax #

773

**SUPRACELL Circular DAF
 Dissolved Air Flotation Clarifier**

Automatic Level Control

An automatic level control system (manual weir is optional) constantly monitors flow fluctuations and keeps the level in the tank accurate to 1/8" to ensure consistent and precise sludge removal. The automatic level control system consists of a pressure transducer mounted on the tank to monitor level fluctuations, a process control unit, and a level control valve mounted on the effluent line of the tank to modulate flow as needed to maintain the preset level.

USE OF SHALLOW TANKS

There is only 18-22 inches of water in the clarifier; therefore the unit has a very low floor loading. Typically, units will weigh ~160 lbs / sf or less.

The shallow tank design provides for easy operation tank inspection and cleaning.

A viewing window is mounted on the side of the tank for observation of the flotation process and facilitates the optimization of chemical dosing (if necessary).

The shallow, open tank design also allows for utilization of the unit on a wide variety of applications. Heavy oil and grease applications or heavy sand / grit applications are well suited to the design since there are few obstructions within the tank to accumulate solids.

A bottom scraper cleans the unit of any sediment debris that is then automatically purged.

All of the inlet and outlet connections are at the bottom of the unit, allowing the unit to be installed in an elevated position.

Elevation eliminates the need for an additional pumping stage when it is necessary to drain the clarified water or flocced sludge.

The spiral scoop mechanism is designed for precise sludge removal by biting into only the sludge layer above the clarified water level. This increases floated sludge consistency, benefiting downstream sludge handling equipment by reducing flow and chemical consumption on the press.

TABLE OF CAPACITIES

SIZE Diameter (feet)	CAPACITY GPD
4	30
6	65
8	148
10	263
12	394
15	525
18	789
20	961
22	1160
24	1340
27	1695
30	2090
33	2580
36	3125
40	3840
44	4630
49	5650
55	6290
62	9265
70	11300

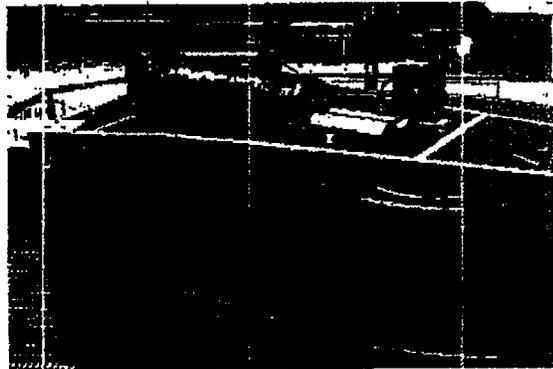


EXHIBIT G

MECKLER BULGER & TILSON LLP

JEFFREY A. BERMAN
ANNE L. BLUME
BRIAN W. BULGER
JACK J. CARRIGLIO
JANET R. DAVIS
JOHN E. DELASCIO
KAREN M. DIXON
J. STUART GARBUTT
PAUL R. GARRY
BRENT J. GRABER
J. ROBERT HALL
REBECCA R. HALLER
BRETT D. HEINRICH
JAMES J. HICKEY
RICHARD A. HODYL, JR.
JAMES H. KALLIANIS, JR.
CHRISTOPHER E. KENTRA
PHILIP R. KING
MARI HENRY LEIGH
MICHAEL I. LEONARD
MICHAEL S. LOEFFLER
MICHAEL M. MARICK

KENT MAYNARD, JR.
MICHAEL D. MCCORMICK
BRUCE R. MECKLER
STEVEN D. PEARSON
PAMELA G. PERRONE
ALAN M. POSNER
DON R. SAMPEN
JASON R. SCHULZE
SCOTT M. SEAMAN
ERIC D. STUBENVOLL
JEROME C. STUDER
JOSEPH E. TILSON
JULIE L. TRESTER
MATTHEW R. WILDERMUTH
BRIAN J. WILLIAMS
TIMOTHY A. WOLFE
OF COUNSEL
ALEX V. BARBOUR
JOHN K. DALY
ZIYAD I. NACCASHA
THOMAS J. O'BRIEN
PETER PETRAKIS
GEORGENE M. WILSON

123 NORTH WACKER DRIVE
SUITE 1800

CHICAGO, ILLINOIS 60606

TELEPHONE: 312-474-7900

FACSIMILE: 312-474-7898

WEB SITE: www.mbtlaw.com

DIRECT DIAL: 312-474-4492

E-MAIL: matthew.cohn@mbtlaw.com

ROBERT J. AMBROSE
JAMES G. ARGIONIS
EILEEN E. BAKER
PHILLIP K. BETH
LAUREN W. BLATT
MARK E. BOJAN
DAVID D. BROWN
ROBERT E. BROWNE, JR.
PATRICK W. CARLSON
MATTHEW E. COHN
ANDREW W. DALTON
DAVID M. DOLENDI
MITCHELL J. EDLUND
ELIZABETH J. M. FULTON
LYNN GEERDES-LUGO
JEREMY J. GLENN
CARRIE L. GRAZIANI

JOSHUA E. HORNADAY
ANDREW M. HUTCHISON
J. AARON JENSEN
GEORGE K. KATSOUDAS
CHARLOTTE S. KORMENDY
JONATHAN D. LICHTERMAN
JASON E. LOPATA
ERIC E. LYNCH
JENNIFER M. MCMAHON
ERIC E. NEWMAN
OMAR S. ODLAND
MEAGHAN L. SCHNEIDER
E. LYNETTE STAFFORD
RONALD A. STEARNEY, JR.
SARA G. UFFELMAN
ANNA WERMUTH

January 11, 2005

VIA CERTIFIED MAIL AND FEDERAL EXPRESS

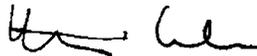
Ms. Barb Conner and Ms. Beverly Booker
Illinois Environmental Protection Agency
Bureau of Water
P.O. Box 19276
Springfield, Illinois 62794

Re: **Violation Notice: W-2004-00568**
Facility I.D.: ILU000624
Compliance Commitment Agreement

Dear Ms. Conner and Ms. Booker:

During the meeting of December 21, 2004, C&F Packing was prepared to provide the Illinois EPA with an unsigned copy of the Supplemental Water Pollution Control Permit Application in response to the above referenced violation notice. Instead of accepting the permit application at that time, the Illinois EPA requested that we submit the application, with all of the required signatures, with the Compliance Commitment Agreement on January 11, 2005. We obtained a signature from the Village of Lake Villa on January 5, 2005 and a signature from the Northwest Regional Water Reclamation Facility on January 6, 2005. As of today, however, the Lake County Department of Public Works is still reviewing the permit application. The enclosed CCA thus contains an unsigned copy of the permit application. We anticipate receiving the Department's signature this week, and we will then immediately supplement this submittal by forwarding to your attention the fully executed application.

Sincerely,



Matthew E. Cohn

cc: **Michael S. Garretson**
Chuck Gunnarson
Bill Ingersoll
Michael McCabe

MECKLER BULGER & TILSON LLP

Page 2

January 11, 2005

bcc: Dennis Olson
Martin Glab

N:\2333\corres\2005-01-11 Letter re Unsigned Permit.doc

EXHIBIT H



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
 JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

217/782-9720

CERTIFIED MAIL # 7002 3150 0000 1253 9279
 RETURN RECEIPT REQUESTED

February 3, 2005

Mr. Matthew E. Cohn
 Meckler Bulger & Tilson LLP
 123 North Wacker Drive, Suite 1800
 Chicago, Illinois 60606

Re: Compliance Commitment Rejection, Violation Notice: W-2004-00568
Facility ID: ILU000624-C&F Packing Company

Dear Mr. Cohn:

The Illinois Environmental Protection Agency ("Illinois EPA") **rejects** the Compliance Commitment Agreement ("CCA") proposed by C&F Packing dated January 11, 2005, in response to the Violation Notice dated November 1, 2004. The proposed CCA is rejected due to the nature and seriousness of the violations.

Because the violations remain the subject of disagreement between the Illinois EPA and C&F Packing Company, this matter will be considered for referral to the Office of the Attorney General, the State's Attorney or the United States Environmental Protection Agency for formal enforcement action and the imposition of penalties.

Questions regarding this matter should be directed to Barb Conner at 217/782-9720. Written communications should be directed to Beverly Booker at Illinois Environmental Protection Agency, Bureau of Water, CAS #19, P.O. Box 19276, Springfield, IL 62794-9276, and all communications shall include reference to your Violation Notice Number W-2004-00568.

Sincerely,

Michael S. Garretson, Acting Manager
 Compliance Assurance Section
 Bureau of Water

cc: Dennis Olson, C&F Packing Company

EXHIBIT I



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

— ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

(217) 782-5544

March 17, 2005

Dennis Olson
C&F Packing Company
515 Park Avenue
Lake Villa, Illinois 60046

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

7000 1670 0004 1555 9765

Re: Notice of Intent to Pursue Legal Action
Violation Notice: W-2004-00568
Facility I.D.: ILU000624

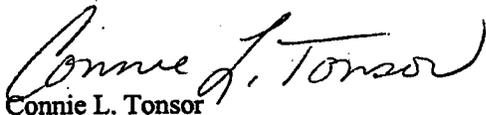
Dear Mr. Olson:

This Notice of Intent to Pursue Legal Action is provided pursuant to Section 31(b) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(b)(2002). The Illinois Environmental Protection Agency ("Illinois EPA") is providing this notice because C&F Packing Company failed to adequately respond to the Violation Notice dated November 1, 2004 and issued by the Illinois EPA within the time frame required by Section 31 of the Act.

The Illinois EPA is providing this notice because it may pursue legal action for the violations of environmental statutes, regulations and permits specified in Attachment A. The Notice of Intent to Pursue Legal Action provides the opportunity to schedule a meeting with representatives of the Illinois EPA to attempt to resolve the violations of the Act, regulations and permits specified in Attachment A. If a meeting is requested, it must be held within thirty (30) days of receipt of this notice unless an extension of time is agreed to by the Illinois EPA.

If you wish to schedule a meeting with representatives of the Illinois EPA or have any questions, please contact Charles Gunnarson, Assistant Counsel, at (217) 782-5544 within twenty (20) days of your receipt of this notice.

Sincerely,



Connie L. Tonsor
Associate Counsel
Division of Legal Counsel

Attachment

CLT/CWG:cg/g:\Gunnarson\C&F2\NITPLAtr

Dennis Olson
C&F Packing Company
Notice of Intent to Pursue Legal Action

Page 2

cc: Matthew E. Cohn, Esq.
Meckler, Bulger & Tilson LLP
123 North Wacker Drive, Suite 1800
Chicago, Illinois 60606

ATTACHMENT A**Pass Through/Interference**

Violation Date	Violation Description
07/09/04, 07/10/04 & 08/15/04	No person shall introduce pollutants which interfere with the operation or performance of the POTW.

Rule/regulation violation(s): Section 12(a) and (h) of the Act, 415 ILCS 5/12(a) and (h)(2002); 35 Ill. Adm. Code 307.1101(a)2.

Systems Reliability

Violation Date	Violation Description
07/09/04 & 07/10/04	All treatment works and associated facilities shall be so constructed and operated as to minimize violations of application standards.

Rule/regulation violation(s): Section 12(a) of the Act, 415 ILCS 5/12(a) (2002); 35 Ill. Adm. Code 306.102.

Failure to Construct Wastewater Treatment Facilities as Permitted by the Illinois EPA

Violation Date	Violation Description
09/03/04	There shall be no deviations from approved plans and specifications.

Rule/regulation violation(s): Section 12(b) of the Act, 415 ILCS 5/12(b)(2002); Standard Condition 3 of Permit No. 2002-EN-0089-1

EXHIBIT J

FILED

OCT 18 2005

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS
CHANCERY DIVISION

PEOPLE OF THE STATE OF ILLINOIS,)
ex rel. LISA MADIGAN,)
Attorney General of the State of Illinois,)
)
Plaintiff,)
)
vs.) No.)
)
C & F PACKING CO., INC.,)
an Illinois corporation,)
)
Defendant.)

05CH1725

COMPLAINT FOR INJUNCTION AND CIVIL PENALTIES

Now comes the Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, *ex rel.* LISA MADIGAN, Attorney General of the State of Illinois, on her own motion, and at the request of the Illinois Environmental Protection Agency, and complains of the Defendant, C & F PACKING CO., INC., an Illinois corporation, as follows:

COUNT I

WATER POLLUTION

1. This Count is brought on behalf of the PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, on her own motion and at the request of the Illinois Environmental Protection Agency ("Illinois EPA"), pursuant to Section 42 of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/12 (2004), to restrain ongoing violations of the Act and for civil penalties.

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2004), and charged, *inter alia*, with the duty of enforcing the Act.

3. At all times relevant to this complaint, Defendant, C & F PACKING CO., INC., ("C & F"), was and is an Illinois corporation in good standing.

4. At all times relevant to this complaint, C & F was and is located at 515 Park Avenue, Lake Villa, in the County of Lake, Illinois. C & F processes sausage and other cooked meats for use on pizzas and as soup bases.

5. As part of its operations, process wastewater generated by C & F's Lake Villa facility discharges to the Fox Lake Water Reclamation District's ("FLWRD") publicly-owned treatment works ("POTW").

6. Section 12(a) of the Act, 415 ILCS 5/12 (2004), provides as follows:

No person shall:

- (a) Cause or threaten or allow the discharge of any contaminants into the environment in any State so as to cause or tend to cause water pollution in Illinois, either alone or in combination with matter from other sources, or so as to violate regulations or standards adopted by the Pollution Control Board under this Act.

* * *

7. Sections 3.315, 3.455 and 3.545 of the Act, 415 ILCS 5/3.315, 5/3.455 and 5/3.545 (2004), respectively, provide the following definitions:

"PERSON" is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

“SEWAGE WORKS” means individually or collectively those constructions or devices used for collecting, pumping, treating, and disposing of sewage, industrial waste or other wastes or for the recovery of by-products from such wastes.

“WATER POLLUTION” is such alteration of the physical, thermal, chemical, biological or radioactive properties of any waters of the State, or such discharge of any contaminant into any waters of the State, as will or is likely to create a nuisance or render such waters harmful or detrimental or injurious to public health, safety or welfare, or to domestic, commercial, industrial, agricultural, recreational, or other legitimate uses, or to livestock, wild animals, birds, fish, or other aquatic life.

8. Section 3.550 of the Act, 415 ILCS 5/3.550 (2004), provides as follows:

"WATERS" means all accumulations of water, surface and underground, natural, and artificial, public and private, or parts thereof, which are wholly or partially within, flow through, or border upon this State.

9. Defendant is a “person” as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2004).

10. On or about February 13, 2002, the Illinois EPA issued a construction permit, Permit No. 2002-EN-0089, to the Defendant for the construction of a wastewater pretreatment system and connection to the FLWRD POTW, said construction permit requiring an 18,000-gallon aerated gravity separator and various other equipment.

11. On or about December 24, 2002, the Illinois EPA issued a supplemental permit, Permit No. 2002-EN-0089-1, to the Defendant that specified the following facility revisions of the February 13, 2002 permit: “a pretreatment system consisting of an 18,000-gallon equalization tank with pH adjustment” and “an 18,000-gallon dissolved air flotation unit.”

12. On or about July 9, 2004, Defendant experienced a pretreatment system failure at its facility in Lake Villa, Illinois, thereby causing a slug load of contaminants to be introduced into the FLWRD POTW.

13. On or about August 15, 2004, Defendant caused an obstruction of flow in the Lake Villa sanitary sewer system due to a grease buildup, resulting in an overflow of a manhole located at Park Avenue and Route 83 in Lake Villa, Illinois. The sewage that overflowed entered a catch basin that discharges to a pond in a nearby residential subdivision. The pond, in turn, discharges to a storm sewer that eventually discharges into a wetland area.

14. The nearby pond in a residential subdivision is a "water" of the State as that term is defined in Section 3.550 of the Act, 415 ILCS 5/3.550 (2004).

15. On or about September 3, 2004, an Illinois EPA inspection revealed that the pretreatment system located at Defendant's Lake Villa facility significantly deviated from the system approved by the Illinois EPA construction permit. The proposed 18,000-gallon dissolved air flotation unit had an actual total volume of 1,616-gallons.

16. From approximately February 2002, and continuing until the filing of this complaint, Defendant failed to construct its pretreatment system in accordance with the construction permits it was issued, which caused the slug loading of the POTW, and the sanitary sewer overflows.

17. By failing to construct its pretreatment system in accordance with the construction permits issued to it by the Illinois EPA, resulting in slug loading of the FLWRD's POTW and sanitary sewer overflows that discharged to a pond in a nearby residential subdivision, the Defendants have caused or tended to cause water pollution in Illinois.

18. Defendant, by its actions as alleged herein, has violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2004).

19. Plaintiff is without an adequate remedy at law. Plaintiff will be irreparably injured and violations of pertinent environmental statutes will continue unless this Court grants equitable relief in the form of preliminary, and, after trial, permanent injunctive relief.

WHEREFORE, Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that this Court grant a preliminary injunction and, after a trial, a permanent injunction, in the favor of Plaintiff and against Defendant, C & F PACKING CO., INC., and enter an Order with respect to this Count I:

- A. Finding that the Defendant has violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2004);
- B. Enjoining the Defendant from any further violations of Section 12(a) of the Act, 415 ILCS 5/12(a) (2004);
- C. Ordering the Defendant to undertake and complete, as expeditiously as possible, any action required to remedy the contamination;
- D. Assessing a civil penalty of \$50,000.00 against the Defendant for each and every violation of the Act and pertinent regulations and an additional \$10,000.00 for each day during which the violation continues;
- E. Ordering that all costs of this action, including expert witness, consultant and attorney fees, be taxed against the Defendant; and
- F. For such other relief as this Court may deem appropriate and just.

COUNT II

**FAILURE TO CONSTRUCT WASTEWATER PRETREATMENT SYSTEM
AS PERMITTED**

1-16. Plaintiff realleges and incorporates by reference herein paragraphs 1 through 16 of Count I as paragraphs 1 through 16 of this Count II.

17. Section 12(b) of the Act, 415 ILCS 5/12(b) (2004), provides, in pertinent part, as follows:

No person shall:

* * *

- (b) Construct, install, or operate any equipment, facility, vessel, or aircraft capable of causing or contributing to water pollution, or designed to prevent water pollution, of any type designated by Board regulations, without a permit granted by the Agency, or in violation of any conditions imposed by such permit.

* * *

18. Defendant's operation of the facility is subject to the Act and the Rules and Regulations promulgated by the Illinois Pollution Control Board ("Board") and the Illinois EPA. The Board's water pollution regulations are found in Title 35, Subtitle C, Chapter I of the Illinois Administrative Code ("Board Water Pollution Regulations"), and the Illinois EPA rules and regulations for water pollution are found in Title 35, Subtitle C, Chapter II of the Illinois Administrative Code ("Illinois EPA Water Pollution Regulations").

19. Section 306.102 of the Board Water Pollution Regulations, 35 Ill. Adm. Code 306.102, provides as follows:

Systems Reliability

- a) Malfunctions: All treatment works and associated facilities shall be so constructed and operated as to minimize violations of applicable standards during such contingencies as flooding, adverse weather, power failure, equipment failure, or maintenance, through such measures as multiple units, holding tanks, duplicate power sources, or such other measures as may be appropriate.
- b) Spills: All reasonable measures, including where appropriate the provision of catchment areas, relief vessels, or entrapment dikes, shall be taken to prevent any spillage of contaminants from causing water pollution.

20. From approximately February 2002, and continuing until the filing of this complaint, Defendant failed to construct its wastewater pretreatment system as stated in its permits, resulting in sewer overflows and slug load discharges to the FLWRD POTW.

21. By failing to construct its wastewater pretreatment system as permitted, thereby allowing overflows and slug load discharges to the FLWRD POTW, the Defendant has violated Section 306.102 of the Board Water Pollution Regulations, 35 Ill. Adm. Code 306.102, and has thereby, also, violated Section 12(b) of the Act, 415 ILCS 5/12(b) (2004).

22. Plaintiff is without an adequate remedy at law. Plaintiff will be irreparably injured and violations of the pertinent environmental statutes and regulations will continue unless and until this Court grants equitable relief in the form of preliminary and, after trial, permanent injunctive relief.

WHEREFORE, Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that this Court grant a preliminary injunction and, after a trial, a permanent injunction, in the favor of Plaintiff and against Defendant, C & F PACKING CO., INC., and enter an Order with respect to this Count II:

A. Finding that Defendant has violated Section 306.102 of the Board Water Pollution Regulations, and Section 12(b) of the Act, 415 ILCS 5/12(b) (2004);

B. Enjoining Defendant from any further violations of Section 306.102 of the Board Water Pollution Regulations, and Section 12(b) of the Act, 415 ILCS 5/12(b) (2004);

C. Ordering the Defendant either to construct its wastewater pretreatment system as permitted or to modify the permit;

D. Assessing a civil penalty upon Defendant of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act, and pertinent regulations promulgated thereunder, with an additional penalty of Ten Thousand Dollars (\$10,000.00) for each day during which the violation continues;

E. Ordering Defendant to pay all costs of this action, including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and

F. Granting such other relief as this Court deems appropriate and just.

COUNT III

INTERFERING WITH THE OPERATION OR PERFORMANCE OF A POTW

1-20. Plaintiff realleges and incorporates by reference herein paragraphs 1 through 16 and paragraphs 17 through 20 of Count II as paragraphs 1 through 20 of this Count III.

21. Section 12(h) of the Act, 415 ILCS 5/12(h) (2004), Provides, in pertinent part, as follows:

No person shall:

* * *

(h) Introduce contaminants into a sewage works from any nondomestic source except in compliance with the regulations and standards adopted by the Board under this Act.

22. Section 307.1101(a)(2) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 307.1101, provides, in pertinent part, as follows:

No person may introduce the following types of pollutants into a POTW:

a) General Requirements

* * *

2) Pollutants that interfere with the operation or performance of the POTW.

* * *

23. Section 301.365 of the Board Water Pollution Regulations, 35 Ill. Adm. Code 301.365, provides as follows:

"PUBLICLY OWNED TREATMENT WORKS" is a treatment works owned by a municipality, sanitary district, county or state agency, and which treats domestic and industrial wastes collected by a publicly owned or regulated sewer system.

24. The Fox Lake Water Reclamation District's POTW is a "publicly owned treatment works", as that term is defined under Section 301.365 of the Board Water Pollution Regulations, 35 Ill. Adm. Code 301.365.

25. On July 9, 2004 and August 15, 2004, Defendant caused or allowed excessive grease and slug loadings of wastewater to discharge into Lake Villa's sanitary sewers causing overflows, and discharges into FLWRD'S POTW.

26. By causing or allowing excessive grease and slug loadings of wastewater to discharge to Lake Villa's sanitary sewers, causing overflows, and to discharge into FLWRD's POTW, threatening the proper operation of the POTW, Defendant has violated Section 307.1101(a)(2) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 307.1101(a)(2), and has, thereby, also violated Section 12(h) of the Act, 415 ILCS 5/12(h) (2004).

27. Plaintiff is without an adequate remedy at law. Plaintiff will be irreparably injured and violations of the pertinent environmental statutes and regulations will continue unless and until

this Court grants equitable relief in the form of preliminary and, after trial, permanent injunctive relief.

WHEREFORE, Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that this Court grant a preliminary injunction and, after a trial, a permanent injunction, in the favor of Plaintiff and against Defendant, C & F PACKING CO., INC., and enter an Order with respect to this Count III:

A. Finding that Defendant has violated Section 307.1101(a)(2) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 307.1101(a)(2), and Section 12(h) of the Act, 415 ILCS 5/12(h) (2004);

B. Enjoining Defendant from any further violations of Section 307.1101(a)(2) of the Board Water Pollution Regulations, and Section 12(h) of the Act, 415 ILCS 5/12(h) (2004);

C. Order the Defendant to undertake and complete, as expeditiously as possible, any action required to remedy the contamination;

D. Assessing a civil penalty upon Defendant of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act, and pertinent regulations promulgated thereunder, with an additional penalty of Ten Thousand Dollars (\$10,000.00) for each day during which the violation continues;

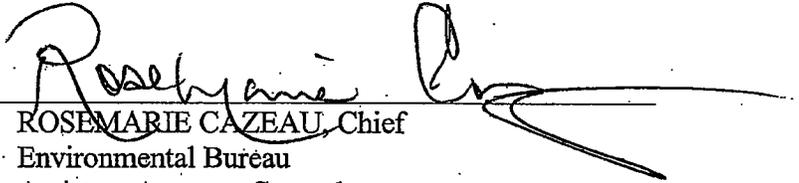
E. Ordering Defendant to pay all costs of this action, including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and

F. Granting such other relief as this Court deems appropriate and just.

PEOPLE OF THE STATE OF ILLINOIS,
ex rel. LISA MADIGAN,
Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division

BY:


ROSEMARIE CAZEAU, Chief
Environmental Bureau
Assistant Attorney General

OF COUNSEL:

PAULA BECKER WHEELER
Assistant Attorney General
Environmental Bureau
188 W. Randolph Street, 20th Floor
Chicago, IL 60601
(312)814-1511

EXHIBIT K

STATE OF ILLINOIS)
) SS.
COUNTY OF LAKE)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

C&F PACKING COMPANY, INC., an)
Illinois corporation,)
)
 Petitioner,)
)
 v.)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY and LAKE)
COUNTY,)
)
 Respondents.)

PCB 05-_____
(Variance Petition)

AFFIDAVIT OF DENNIS J. OLSON

I, Dennis J. Olson, having been duly sworn upon oath, do hereby state and depose as follows:

1. I have personal knowledge of all facts stated herein and, if called upon to do so, I could competently testify thereto.
2. I am secretary/treasurer of C&F Packing Company, Inc. ("C&F Packing"), whose facility is located at 515 Park Ave., Lake Villa, Illinois.
3. I am aware that on January 7, 2005, a Supplemental Permit Application to revise Illinois Environmental Protection Agency Permit Number 2002-EN-0089-1 (the "Supplemental Permit Application") was delivered to the Lake County Department of Public Works (the "Public Works Department") at 650 West Winchester Road in Libertyville, Illinois by Martin Glab's assistant.

4. The Supplemental Permit Application requires Peter Kolb to certify on behalf of the Lake County Department of Public Works that the “sewers to which this project will be a tributary have adequate reserve capacity to transport the wastewater that will be added by the project without causing a violation of the Illinois Environmental Protection Act or Subtitle C, Chapter I”

5. The Supplemental Permit Application also requires certifications of adequate capacity from the Northwest Regional Water Reclamation Facility (“Fox Lake”) and the Village of Lake Villa (“Lake Villa”). I am aware that the version of the Supplemental Permit Application which was delivered to the Public Works Department had been previously certified by representatives of Fox Lake and Lake Villa, and thus only required certification by Lake County.

6. On February 16, 2005, I participated in a meeting at the Public Works Department office in Libertyville. That meeting was arranged by C&F Packing’s plant engineer Martin Glab. The purpose of that meeting was to discuss the reason for the Department’s refusal to certify the Supplemental Permit Application. The meeting was attended by the following persons:

- Dennis J. Olson, secretary/treasurer of C&F Packing;
- Martin Glab, plant engineer for C&F Packing;
- Jeffrey Zak, engineer of Scientific Control Laboratories, Inc., consultant retained by C&F Packing;
- Peter Kolb, director of the Public Works Department;
- Dennis Price, engineer at the Public Works Department;
- Chuck Degrave, engineer at the Public Works Department;
- David Hartwig, Lake Villa Village Trustee; and
- Jim Bowles, Lake Villa Water Operator.

7. At the February 16, 2005 meeting, I was provided with a copy of a memorandum dated February 2, 2005 from Dennis Price and Chuck Degrave to Peter Kolb. The memorandum is titled “Lake Villa Agreement / Village Southern Interceptor.” A copy of which is appended to

this Affidavit as Exhibit 1. This document reports that the agreed discharge limit for Lake Villa's Southern Interceptor is 11,700 PE, and that the permitted loading inclusive of the discharge amount in C&F Packing's Supplemental Permit Application is 10,848 PE.

8. During the February 16, 2005 meeting, Peter Kolb confirmed that he has refused to sign the certification in the Supplemental Permit Application on behalf of the Lake County Department of Public Works because Lake County believes it is owed money for sewer connection fees stating, more particularly, as follows:

A. Peter Kolb confirmed that he had reviewed the Supplemental Permit Application and told me that their sewers had adequate reserve capacity to transport the wastewater which is the subject of the Supplemental Permit Application.

B. Peter Kolb further stated he would refuse to certify the Supplemental Permit Application so long as the sewer connection fee dispute was unresolved.

9. On or about July 6, 2005, I contacted Peter Kolb by telephone to see if just the two of us could get together to discuss the problem with the hold up of the Supplemental Permit Application. He and I agreed that we would meet at his office on July 15, 2005.

10. On July 15, 2005, I met with Peter Kolb at the Public Works Department office in Libertyville.

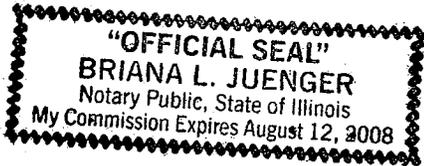
11. During the July 15, 2005 meeting, Peter Kolb again confirmed that he has refused to sign the certification in the Supplemental Permit Application on behalf of the Lake County Department of Public Works solely because Lake County believes that money is owed to it for past sewer connection permits.

FURTHER AFFIANT SAYETH NOT.


DENNIS J. OLSON

SUBSCRIBED and SWORN to
before me this 21st day of
October, 2005.


NOTARY PUBLIC



STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

C&F PACKING COMPANY, INC., an)
Illinois corporation,)
)
 Petitioner,)
)
 v.) PCB 05-_____
)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY and LAKE)
COUNTY,)
)
 Respondents.)

(Variance Petition)

AFFIDAVIT OF JEFF ZAK

I, Jeffrey Zak, having been duly sworn upon oath, do hereby state and depose as follows:

1. I have personal knowledge of all facts stated herein and, if called upon to do so, I could competently testify thereto.

2. I am manager of engineering services at Scientific Control Laboratories, Inc., whose offices are located at 3158 South Kolin Avenue in Chicago, Illinois. I have been retained as an engineering consultant by C&F Packing Company, Inc. ("C&F Packing"), whose facility is located at 515 Park Ave., Lake Villa, Illinois.

3. I am aware that on January 7, 2005, the Supplemental Permit Application to revise Illinois Environmental Protection Agency Permit Number 2002-EN-0089-1 (the "Supplemental Permit Application") that I prepared was delivered to the office of the Lake County Department of Public Works (the "Public Works Department") at 650 West Winchester Road in Libertyville, Illinois.

4. The Supplemental Permit Application requires Peter Kolb to certify on behalf of the Public Works Department that the “sewers to which this project will be a tributary have adequate reserve capacity to transport the wastewater that will be added by the project without causing a violation of the Illinois Environmental Protection Act or Subtitle C, Chapter I”

5. The Supplemental Permit Application also requires certifications of adequate capacity from the Northwest Regional Water Reclamation Facility (“Fox Lake”) and the Village of Lake Villa (“Lake Villa”). I am aware that the version of the Supplemental Permit Application which was delivered to the Public Works Department had been previously certified by representatives of Fox Lake and Lake Villa, and thus only required certification by Lake County.

6. On February 16, 2005, I participated in a meeting at the Public Works Department office in Libertyville. The purpose of that meeting was to discuss the reason for the Department’s refusal to certify the Supplemental Permit Application. The meeting was attended by the following persons:

- Dennis J. Olson, owner of C&F Packing;
- Martin Glab, plant engineer for C&F Packing;
- Jeffrey Zak, engineer of Scientific Control Laboratories, Inc., consultant retained by C&F Packing;
- Peter Kolb, director of the Public Works Department;
- Dennis Price, engineer at the Public Works Department;
- Chuck Degrave, engineer at the Public Works Department;
- David Hartwig, Lake Villa Village Trustee; and
- Jim Bowles, Lake Villa Water Operator.

7. At the February 16, 2005 meeting, I was provided with a copy of a memorandum dated February 2, 2005 from Dennis Price and Chuck Degrave to Peter Kolb. The memorandum is titled “Lake Villa Agreement / Village Southern Interceptor.” A copy of which is appended to this Affidavit as Exhibit 1. That document reports that the agreed discharge limit for Lake

Villa's Southern Interceptor is 11,700 PE, and that the permitted loading inclusive of the discharge amount in C&F Packing's Supplemental Permit Application is 10,848 PE.

8. During the February 16, 2005 meeting, Peter Kolb confirmed that he has refused to sign the certification in the Supplemental Permit Application on behalf of the Lake County Department of Public Works because Lake County believes it is owed money for sewer connection fees stating, more particularly, as follows:

A. Peter Kolb confirmed that he had reviewed the Supplemental Permit Application and had affirmatively concluded that the pertinent sewers have adequate reserve capacity to transport the wastewater which is the subject of the Supplemental Permit Application.

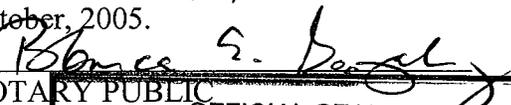
B. Peter Kolb further stated he would refuse to certify the Supplemental Permit Application so long as the sewer connection fee dispute was unresolved.

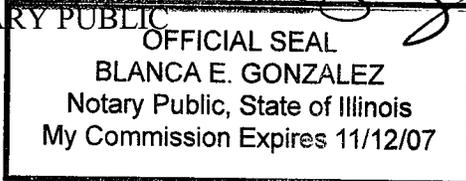
FURTHER AFFIANT SAYETH NOT.



JEFFREY ZAK

SUBSCRIBED and SWORN to
before me this 24 day of
October, 2005.


NOTARY PUBLIC



STATE OF ILLINOIS)
) SS.
COUNTY OF LAKE)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

C&F PACKING COMPANY, INC., an)
Illinois corporation,)
)
 Petitioner,)
)
 v.)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY and LAKE)
COUNTY,)
)
 Respondents.)

PCB 05-_____
(Variance Petition)

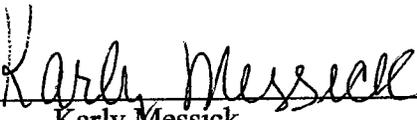
AFFIDAVIT OF KARLY MESSICK

I, Karly Messick, having been duly sworn upon oath, do hereby state and depose as follows:

1. I have personal knowledge of all facts stated herein and, if called upon to do so, I could competently testify thereto.
2. I am the assistant to plant engineer Martin Glab of C&F Packing Company, Inc. ("C&F Packing"), whose sole manufacturing facility is located at 515 Park Ave., Lake Villa, Illinois.
3. On January 7, 2005, I was directed by Martin Glab to deliver a permit application document to the Lake County Department of Public Works (the "Public Works Department") at 650 West Winchester Road in Libertyville, Illinois. The permit application contained approximately 40 pages of paper.

4. I delivered the permit application to the Public Works Department office on January 7, 2005.
5. The permit application was received by the front desk attendant.
6. I told her that I was dropping off a permit application for Chuck Degrave.
7. She said she would pass it along to Mr. Degrave.
8. I then returned to C&F Packing in Lake Villa.

FURTHER AFFIANT SAYETH NOT.

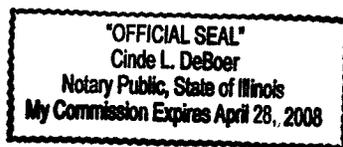


Karly Messick

SUBSCRIBED and SWORN to
before me this 21 day of
October, 2005.



NOTARY PUBLIC



STATE OF ILLINOIS)
) SS.
COUNTY OF LAKE)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

C&F PACKING COMPANY, INC., an)
Illinois corporation,)
)
 Petitioner,)
)
 v.)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY and LAKE)
COUNTY,)
)
 Respondents.)

PCB 05-_____
(Variance Petition)

AFFIDAVIT OF MARTIN GLAB

I, Martin Glab, having been duly sworn upon oath, do hereby state and depose as follows:

1. I have personal knowledge of all facts stated herein and, if called upon to do so, I could competently testify thereto.
2. I am the plant engineer of C&F Packing Company, Inc. ("C&F Packing"), whose sole manufacturing facility is located at 515 Park Ave., Lake Villa, Illinois.
3. On January 7, 2005, I had my assistant Karly Messick deliver a Supplemental Permit Application to revise the Illinois Environmental Protection Agency Permit Number 2002-EN-0089-1 to the Lake County Department of Public Works (the "Public Works Department") at 650 West Winchester Road in Libertyville, Illinois.
4. The Supplemental Permit Application requires director Peter Kolb to certify on behalf of the Lake County Department of Public Works that the "sewers to which this project will be a tributary have adequate reserve capacity to transport the wastewater that will be added

by the project without causing a violation of the Illinois Environmental Protection Act or Subtitle C, Chapter I”

5. The Supplemental Permit Application also requires certification of adequate capacity from the Northwest Regional Water Reclamation Facility (“Fox Lake”) as well as the Village of Lake Villa (“Lake Villa”). The version of the Supplemental Permit Application which was delivered to the Public Works Department had been previously certified by representatives of Fox Lake and Lake Villa, and thus only required certification by Lake County.

6. Approximately, one week after the application had been sent in, I made numerous calls to the Public Works Department engineer, Chuck DeGrave, requesting status of the application. I was told that the application was still being reviewed and awaiting Peter Kolb’s signature.

7. I then consulted with several Lake Villa officials: Mayor Frank Lafredo, Director of Public Works Glenn McCollum, Village Trustee David Hartwig, City Inspector Bob Striker, Water Operator Jim Bowles, and City Engineer Keith Korso. Following those consultations, I arranged a meeting with Lake County, Lake Villa, Fox Lake, and C&F Packing to discuss the issue.

8. On February 16, 2005, I participated in a meeting at the Public Works Department office in Libertyville. The purpose of that meeting was to discuss the reasons for the Department’s refusal to certify the Supplemental Permit Application. The meeting was attended by the following persons:

- Dennis J. Olson, owner of C&F Packing;
- Martin Glab, plant engineer for C&F Packing;
- Jeffrey Zak, engineer of Scientific Control Laboratories, Inc., consultant retained by C&F Packing;
- Peter Kolb, director of the Public Works Department;
- Dennis Price, engineer at the Public Works Department;

- Chuck Degrave, engineer at the Public Works Department;
- David Hartwig, Lake Villa Village Trustee; and
- Jim Bowles, Lake Villa Water Operator.

Steve Vella of Fox Lake was invited but chose not to attend this meeting.

9. At this February 16, 2005 meeting, I was provided with a copy of a memorandum dated February 2, 2005 from Public Works Department engineers Dennis Price and Chuck Degrave to director Peter Kolb, a copy of which is appended to this Affidavit as Exhibit 1. The subject of this memorandum was "Lake Villa Agreement / Village Southern Interceptor," and it reports that the agreed discharge limit for Lake Villa's Southern Interceptor is 11,700 PE, and that the permitted loading inclusive of the discharge amount in C&F Packing's Supplemental Permit Application is 10,848 PE.

10. During the same February 16, 2005 meeting, Peter Kolb confirmed that he has refused to sign the certification in the Supplemental Permit Application on behalf of the Public Works Department because Lake County believes it is owed money for sewer connection fees. More particularly the following points were made:

A. Peter Kolb confirmed that he had reviewed the Supplemental Permit Application and had concluded that the pertinent sewers have adequate reserve capacity to transport the wastewater which is the subject of the Supplemental Permit Application.

B. Peter Kolb further stated he would refuse to certify the Supplemental Permit Application so long as the sewer connection fee dispute was unresolved.

FURTHER AFFIANT SAYETH NOT.

Martin Glab 10-21-05
MARTIN GLAB

SUBSCRIBED and SWORN to
before me this 21 day of
October, 2005.

Christopher Ryan Sybrandy
NOTARY PUBLIC

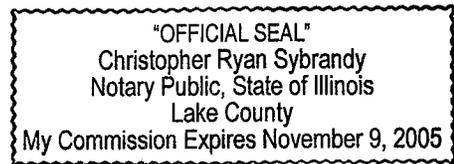


EXHIBIT L

TO: Peter Kolb

FROM: Dennis Price / Chuck Degrave

SUBJECT: Lake Villa Agreement / Village Southern Interceptor

DATE: February 2, 2005

CF Packing Permit

CF Packing has requested a revised permit for increasing of existing flows, due to an IEPA audit. Based on our review of the Original 2001 permit, average daily flows were at 48,000 gpd; in addition the total maximum design flow was 327,000 gpd. A total of \$37.8K was collected for this permit. In 2002 an amended permit came in and existing average daily flows increased to 69,000 gpd however the total flow based on design decreased to 283,000 gpd. No additional fees were collected at that time.

We now have a revised permit application in review, which again increases the existing average daily flow to 147,000 gpd but decreases the maximum design flow to 255,000 gpd. The design Engineer for CF Packing has stated that the maximum design flow reductions are due to a dissolve air floatation system. This system cannot handle the supplier published flow rate as originally calculated in 2001. The new average daily flows are based off of 2004 water bills. A max day rate of 216,000 gpd is based on CF Packing's internal process flow meter.

CF Packing's permit fee is based on an average daily flow of 147,000 gpd. The total fee for this flow is 588 RE at \$1800 per RE equals **\$1,058,400**. Assuming that all previous permits have been finalized, the fee for just this revised permit would be (147,000 - 69,000) or 312 RE at \$1800 per RE equals **\$561,600**.

	Original Permit 2001	Amended Permit 2002	Current Permit Application 2005
Design Process Flow	324,000 gpd	280,000 gpd	255,000 gpd
Non process Flow	3000 gpd	3000 gpd	3000 gpd
Average Daily Flow	45,000 gpd	66,000 gpd	144,000 gpd
Total Ave Daily Flow	48,000 gpd	69,000 gpd	147,000 gpd
Fees Paid by Lake Villa	\$37,000	\$0	

Prairie Trails Permit

The Prairie Trails subdivision has been submitted for review. Prairie Trails Subdivision is tributary to the Lake Villa Southern Interceptor. The subdivision is located in both the Lakes Region Sanitary District and the Lake Villa Village Service Area. The calculated PE loading for this subdivisions is 577.5 PE.

Village Sewer Agreement

Per the above reference agreement Lake County and Lake Villa have an agreed limit of 11,700 PE for the Village Southern Interceptor.

At present we have two IEPA permit applications, which would be tributary to the interceptor, CF Packing and Prairie Trails Subdivision.

The permitted loading for the interceptor without the CF Packing flow is at 8801 PE. Adding the 1470 PE for CF Packing brings the permitted loading for the Village Southern Interceptor to 10,271 PE. Adding the 577 PE for Prairie Trails Subdivision brings the permitted loading for the interceptor to 10,848 PE.

Summary

The CF Packing permit application should be modified to reflect the 1470 PE loading. The additional fee of \$561,600 will need to be addressed and collected.

The permit loading for the Village Sewer Agreement is at 93% of the agreed limit. A discussion with the Village is required to address this issue for future permit capacity.

I suggest we discuss this issue internally and then arrange a meeting with Lake Villa to bring them up to speed on the situation.

EXHIBIT M

Dennis Olson

From: Schmidt, Suzi M. [SSchmidt@co.lake.il.us]
Sent: Thursday, May 19, 2005 9:30 AM
To: 'dolson@cfpacking.com'
Subject: Re: C&F Packing (Lake Villa)

I just got off the phone with Peter Kolb the Public Works Director for Lake County. He will be setting up a meeting with all parties to discuss how this can be resolved. I understand that the fees that you referenced are fees that the Village was to collect from your company for hooking up to the system. The Village does not have the authority to waive fees from another agency so that is what needs to be looked at. Peter will be contacting you.

I am sure once everyone is around the table, something will be worked out.

Suzi

 Sent from my BlackBerry Wireless Handheld (www.BlackBerry.net)

-----Original Message-----

From: Dennis Olson <dolson@cfpacking.com>
To: 'Schmidt, Suzi M.' <SSchmidt@co.lake.il.us>
Sent: Thu May 19 09:24:37 2005
Subject: RE: C&F Packing (Lake Villa)

Thank You !!

Dennis

-----Original Message-----

From: Schmidt, Suzi M. [mailto:SSchmidt@co.lake.il.us]
Sent: Wednesday, May 18, 2005 4:29 PM
To: 'dolson@cfpacking.com'
Subject: Re: C&F Packing (Lake Villa)

Hi Dennis. I will be more than happy to look into this. Please let me do some digging around. I am happy that you chose our area to locate in and I will do whatever I can to help. I will get back to you, hopefully by Friday.

Suzi

 Sent from my BlackBerry Wireless Handheld (www.BlackBerry.net)

-----Original Message-----

From: Dennis Olson <dolson@cfpacking.com>
To: SSchmidt@co.lake.il.us <SSchmidt@co.lake.il.us>
Sent: Wed May 18 14:04:48 2005
Subject: C&F Packing (Lake Villa)

Dear Ms. Schmidt;

I am sending you this e-mail to ask if we could schedule a meeting to discuss some of the issues advanced in the attachment. I want to thank you in advance for taking the time to look over all of this information and hopefully, for agreeing to meet with us. We are looking for your input and advice.

Sincerely,

***** PCB 2006-053 *****

Dennis J. Olson

C&F Packing Co., Inc.

515 Park Avenue

Lake Villa, IL 60046

Telephone: 847-245-2000

Direct Line: 847-245-2012

Fax: 847-245-2100

E-mail: dolson@cfpacking.com

www.cfpacking.com

***** PCB 2006-053 *****



PACKING COMPANY

ARCO BRAND*custom manufacturers of quality food products.*

515 PARK AVE., P.O. BOX 209, LAKE VILLA, IL 60046-0209

(847) 245-2000 FAX (847) 245-2100

Gideon Blustein
 Field Representative
 Congress Woman Melissa L. Bean
 Member of Congress
 Eighth District of Illinois

this letter was originally sent on this
 date to several different individuals

05/19/05

This is a Reprint
 09/02/05

Dear.....

I am writing to request a meeting with you to discuss some of the issues explained in this letter. I would first like to introduce ourselves. We are C&F Packing Co., Inc. and are a family owned business. Back in the 1930's, Sam Freda, our founder, started working with the meat industry in Chicago and eventually established C&F Packing Co. in 1945. C&F started out from humble beginnings and has grown into one of the larger independent producers of custom private label sausage products, meat pizza toppings and other cooked meat products in the country. The Illinois, Lake County and Lake Villa communities can be proud of the customer base C&F services today. (Attached, "Exhibit A", is a short list of companies you might be familiar with). The company is still owned and operated by Joseph Freda Sr. (Sam's son) and Dennis J. Olson (Sam's son-in-law).

C&F was originally located in the Chicago meat packing district. We moved to Elk Grove Village in the 1980's to satisfy increased demands for our products. In 1988 we started a 16 month search for a suitable site to build a new plant, concentrating our efforts in Illinois and Wisconsin. Throughout our search we were working with our engineers to design and then build our new innovative plant. We eventually purchased about 15 ½ acres in the "Park Place Business Center" in Lake Villa, Illinois. It is still the largest investment in the business park to date. Our eventual purchase of the land was a result of much campaigning from the State of Illinois, Lake Villa's mayor, Mr. Frank Loffredo, including the Village Board and Lake County Partners. Throughout construction and start-up of our new facility, C&F added more than 200 new jobs to the community. Additionally, when some of our existing employees transferred to our new plant, some bought, and some built homes in Lake Villa and the surrounding area. This increased to job count an additional 50 plus... We are currently the largest industry in Lake Villa, Illinois and C&F has contributed to an increase in tax revenues.

If Possible, We would like your help on some issues we have with the (NWR WRF) Fox Lake's Northwest Regional Water Reclamation Facility. This has added a considerable negative financial burden to C&F as well as causing doubts about our decision to locate in Illinois and Lake County.

- In 2001 C&F received its first wastewater discharge permit from the Fox Lake Northwest Regional Water Reclamation Facility. That permit expired in 2003.
- A second wastewater discharge permit was issued following that permit's expiration in 2003, which was to last for five years and expire in 2008.
- The second permit contained effluent standards, and surcharge limits for specific parameters. Over the past several years, we have paid surcharges for the treatment of specific parameters in our effluent. Surcharges are not violations, but rather are extra costs for additional treatment required in some effluents.
- There are ceiling concentration limits on the surcharge parameters. These ceilings are the levels we cannot go over. If we go over those surcharge ceiling limits, we can be fined.
- We have paid surcharges but we have always discharged within the surcharge limits.
- We had a sanitary sewer overflow last summer because of an equipment failure. Since then we have made some changes at the plant to prevent a reoccurrence. We have cooperated with the Fox Lake Northwest Regional Water Reclamation Facility and the IEPA in addressing the overflow. (This needs a further explanation)
- On April 6, 2005, without any notice or explanation, we received a new permit that cut off the old permit over 3 years in advance of its expiration date and imposed new conditions. Most significantly, there are new much lower surcharge ceiling limits imposed. One limit was lowered by a factor of 4. Fox Lake adopted a new sewer ordinance in March containing these new limits that are incorporated in our new permit.
- Because of this, we have exercised our right to appeal the issuance of the new permit to the Fox Lake Northwest Regional Water Reclamation Facility. The appeal was sent on Wednesday May 4th, 2005.
- Copy of letter included. Attached file to e-mail.

These Are Some Reasons Why We Need Help with the Fox Lake Northwest Regional Water Reclamation Facility

- We are a responsible and beneficial business to this community.
- The State of Illinois, Lake Villa and Lake County Partners convinced us to move here several years ago.
- Our ability to operate efficiently, continue to expand, and continue to be a member of the community depends on our ability to have certainty and reasonableness in our wastewater discharge permitting.
- We are in compliance with the law. We do not believe that it is fair or reasonable for the Fox Lake Northwest Regional Water Reclamation Facility to lower surcharge standards. The new ceiling limits are too low, and they have been imposed on our plant with no warning. It is not clear to us that they are even necessary for the Fox Lake Northwest Regional Water Reclamation Facility to effectively treat the wastewater at its facility.
- As a member of the community, and as the member of the community presumably most affected by Fox Lake's new ordinance, we feel that we should have been contacted and given an opportunity to participate in the development of the new ordinance. We also believe that we deserve a reasonable explanation of the necessity of the new ceiling limits. Our suspicion is that the ordinance is not justified, and the lower standards really lowered arbitrarily to allow the Fox Lake Northwest Regional Water Reclamation Facility to increase its revenue through fines.
- We are seeking your help to persuade the Fox Lake Northwest Regional Water Reclamation Facility to restore the requirements of our previous permit.

Other Issues Facing C&F Packing Concerning the Lake County Department of Public Works

- We have recently prepared a supplemental construction permit application which requires a sign-off from the Lake County Department of Public Works.
- The application was prepared in response to a request from the IEPA.
- Lake Villa and the Fox Lake Northwest Regional Water Reclamation Facility have both approved the application.
- Lake County needs to sign it before it can be sent to the IEPA.

- Lake County will not sign it because of an issue it has with Lake Villa concerning sewer connection fees that dates back several years.
- We believe this issue is unrelated to the issues addressed in our supplemental permit application, and that Lake County is using our supplemental permit application as a bargaining chip for its issues with Lake Villa concerning connection fees. Because of these issues we are not in compliance with the IEPA and they want an answer.

Why We Need Your Help with the Lake County Department of Public Works

- We are seeking your help in persuading the Lake County Department of Public Works to sign the supplemental permit application, so that we can provide it to the IEPA as requested.

We are requesting a meeting with you to try and resolve the IEPA issue. We also want to answer any questions you might have and to get your advice and input on resolving this problem. Hopefully, you will also have time to discuss some of the other issues advanced in this letter. I apologize for the long explanations involved but, we wanted to give you enough information so you can understand where we are coming from.

I want to thank you in advance for taking the time to look over all of this data and hopefully, for agreeing to meet with us or to help us in some way with the impasse between Lake County and Lake Villa.

Sincerely,

Dennis J. Olson

Dennis J. Olson
C&F Packing Co., Inc.

"Exhibit A"

This is an indication of the contribution C&F has made to the Illinois community. If this business has to move somewhere else, we feel it would have a negative financial effect on both Lake Villa and the State.

Short List of Customers

KFC
Little Caesars'
Uno's Pizza
Home Run Inn Pizza
Sbarro's Pizza

Heinz, Corp.
Schwans, Inc. (Tony's Pizza), (Red Barron Pizza), (Fraschetta Pizza), etc.
Best Foods
Custom Foods
Nations Frozen Pizza
Cousin's, Inc.
Great Kitchen's, Inc.
Benardi's, Pizza
D'Lisi Food Systems
Griffith Labs
Kronos Central, Inc.
Vannie Foods

Dominicks Food Stores
Roundy's Food Stores
Meijer Foods, Inc.
Copps Food Stores
Rainbow Food Stores
Safeway Food Stores

Syso Food Service
Vistar Food Service
Lisanit Food Service
Unilever Foods
Unified Food Service
GFS Food Service
Blue Line Food Service
Market Day

Johnsonville, Inc.
Klements, Inc.
Cher Make Sausage Co.
Hans
Gerhard'
PM Pellegrino, Inc.

EXHIBIT N

Dennis Olson

From: Bonnie Thomson Carter [BonnieC5@comcast.net]
Sent: Sunday, June 05, 2005 9:06 PM
To: Dennis Olson
Subject: Re: C&F Packing (Lake Villa)

Hi Dennis,

Thank you for sending me your letter stating your position. I do have some knowledge of your situation and know that the State's Attorney's Office is handling this. I have again talked with staff and the Village of Fox Lake. You will be hearing from the county staff in the next week for what I was told.

I have always made it my practice to not involve myself when attorney's are involved. That will have to be the case here. I'm sorry.

I will continue to monitor the situation. And Peter Kolb will keep Suzi Schmidt and I up to date.

Bonnie

— Original Message —

From: Dennis Olson
To: BCarter@co.lake.il.us
Sent: Wednesday, May 18, 2005 1:55 PM
Subject: C&F Packing (Lake Villa)

Dear Ms. Carter;

I am sending you this e-mail to ask if we could schedule a meeting to discuss some of the issues advanced in the attachment. I want to thank you in advance for taking the time to look over all of this information and hopefully, for agreeing to meet with us. We are looking for your input and advice.

Sincerely,

Dennis J. Olson
C&F Packing Co., Inc.
515 Park Avenue
Lake Villa, IL 60046
Telephone: 847-245-2000
Direct Line: 847-245-2012
Fax: 847-245-2100
E-mail: dolson@cfpacking.com
www.cfpacking.com

6/6/2005

***** PCB 2006-053 *****



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custom manufacturers of quality food products.

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 date to several different individuals

05/19/05

This is a Reprint
 09/02/05

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Dennis J. Olson

Dennis J. Olson
C&F Packing Co., Inc.

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Custom Foods
Nations Frozen Pizza
Cousin's, Inc.
Great Kitchen's, Inc.
Benardi's, Pizza
D'Lisi Food Systems
Griffith Labs
Kronos Central, Inc.
Vannie Foods

Dominicks Food Stores
Roundy's Food Stores
Meijer Foods, Inc.
Copps Food Stores
Rainbow Food Stores
Safeway Food Stores

Syso Food Service
Vistar Food Service
Lisanit Food Service
Unilever Foods
Unified Food Service
GFS Food Service
Blue Line Food Service
Market Day

Johnsonville, Inc.
Klements, Inc.
Cher Make Sausage Co.
Hans
Gerhard'
PM Pellegrino, Inc.

EXHIBIT O

* * * * * PCB 2006-053 * * * * *



PACKING COMPANY
ARCO BRAND

custom manufacturers of quality food products.

515 PARK AVE., P.O. BOX 209, LAKE VILLA, IL 60046-0209

(847) 245-2000 FAX (847) 245-2100

Gideon Blustein
 Field Representative
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Dear.....

I am writing to request a meeting with you to discuss some of the issues explained in this letter. I would first like to introduce ourselves. We are C&F Packing Co., Inc. and are a family owned business. Back in the 1930's, Sam Freda, our founder, started working with the meat industry in Chicago and eventually established C&F Packing Co. in 1945. C&F started out from humble beginnings and has grown into one of the larger independent producers of custom private label sausage products, meat pizza toppings and other cooked meat products in the country. The Illinois, Lake County and Lake Villa communities can be proud of the customer base C&F services today. (Attached, "Exhibit A", is a short list of companies you might be familiar with). The company is still owned and operated by Joseph Freda Sr. (Sam's son) and Dennis J. Olson (Sam's son-in-law).

C&F was originally located in the Chicago meat packing district. We moved to Elk Grove Village in the 1980's to satisfy increased demands for our products. In 1988 we started a 16 month search for a suitable site to build a new plant, concentrating our efforts in Illinois and Wisconsin. Throughout our search we were working with our engineers to design and then build our new innovative plant. We eventually purchased about 15 ½ acres in the "Park Place Business Center" in Lake Villa, Illinois. It is still the largest investment in the business park to date. Our eventual purchase of the land was a result of much campaigning from the State of Illinois, Lake Villa's mayor, Mr. Frank Loffredo, including the Village Board and Lake County Partners. Throughout construction and start-up of our new facility, C&F added more than 200 new jobs to the community. Additionally, when some of our existing employees transferred to our new plant, some bought, and some built homes in Lake Villa and the surrounding area. This increased to job count an additional 50 plus... We are currently the largest industry in Lake Villa, Illinois and C&F has contributed to an increase in tax revenues.

If Possible, We would like your help on some issues we have with the (NWR WRF) Fox Lake's Northwest Regional Water Reclamation Facility. This has added a considerable negative financial burden to C&F as well as causing doubts about our decision to locate in Illinois and Lake County.

- In 2001 C&F received its first wastewater discharge permit from the Fox Lake Northwest Regional Water Reclamation Facility. That permit expired in 2003.
- A second wastewater discharge permit was issued following that permit's expiration in 2003, which was to last for five years and expire in 2008.
- The second permit contained effluent standards, and surcharge limits for specific parameters. Over the past several years, we have paid surcharges for the treatment of specific parameters in our effluent. Surcharges are not violations, but rather are extra costs for additional treatment required in some effluents.
- There are ceiling concentration limits on the surcharge parameters. These ceilings are the levels we cannot go over. If we go over those surcharge ceiling limits, we can be fined.
- We have paid surcharges but we have always discharged within the surcharge limits.
- We had a sanitary sewer overflow last summer because of an equipment failure. Since then we have made some changes at the plant to prevent a recurrence. We have cooperated with the Fox Lake Northwest Regional Water Reclamation Facility and the IEPA in addressing the overflow. (This needs a further explanation)
- On April 6, 2005, without any notice or explanation, we received a new permit that cut off the old permit over 3 years in advance of its expiration date and imposed new conditions. Most significantly, there are new much lower surcharge ceiling limits imposed. One limit was lowered by a factor of 4. Fox Lake adopted a new sewer ordinance in March containing these new limits that are incorporated in our new permit.
- Because of this, we have exercised our right to appeal the issuance of the new permit to the Fox Lake Northwest Regional Water Reclamation Facility. The appeal was sent on Wednesday May 4th, 2005.
- Copy of letter included. Attached file to e-mail.

These Are Some Reasons Why We Need Help with the Fox Lake Northwest Regional Water Reclamation Facility

- We are a responsible and beneficial business to this community.
- The State of Illinois, Lake Villa and Lake County Partners convinced us to move here several years ago.
- Our ability to operate efficiently, continue to expand, and continue to be a member of the community depends on our ability to have certainty and reasonableness in our wastewater discharge permitting.
- We are in compliance with the law. We do not believe that it is fair or reasonable for the Fox Lake Northwest Regional Water Reclamation Facility to lower surcharge standards. The new ceiling limits are too low, and they have been imposed on our plant with no warning. It is not clear to us that they are even necessary for the Fox Lake Northwest Regional Water Reclamation Facility to effectively treat the wastewater at its facility.
- As a member of the community, and as the member of the community presumably most affected by Fox Lake's new ordinance, we feel that we should have been contacted and given an opportunity to participate in the development of the new ordinance. We also believe that we deserve a reasonable explanation of the necessity of the new ceiling limits. Our suspicion is that the ordinance is not justified, and the lower standards really lowered arbitrarily to allow the Fox Lake Northwest Regional Water Reclamation Facility to increase its revenue through fines.
- We are seeking your help to persuade the Fox Lake Northwest Regional Water Reclamation Facility to restore the requirements of our previous permit.

Other Issues Facing C&F Packing Concerning the Lake County Department of Public Works

- We have recently prepared a supplemental construction permit application which requires a sign-off from the Lake County Department of Public Works.
- The application was prepared in response to a request from the IEPA.
- Lake Villa and the Fox Lake Northwest Regional Water Reclamation Facility have both approved the application.
- Lake County needs to sign it before it can be sent to the IEPA.

- Lake County will not sign it because of an issue it has with Lake Villa concerning sewer connection fees that dates back several years.
- We believe this issue is unrelated to the issues addressed in our supplemental permit application, and that Lake County is using our supplemental permit application as a bargaining chip for its issues with Lake Villa concerning connection fees. Because of these issues we are not in compliance with the IEPA and they want an answer.

Why We Need Your Help with the Lake County Department of Public Works

- We are seeking your help in persuading the Lake County Department of Public Works to sign the supplemental permit application, so that we can provide it to the IEPA as requested.

We are requesting a meeting with you to try and resolve the IEPA issue. We also want to answer any questions you might have and to get your advice and input on resolving this problem. Hopefully, you will also have time to discuss some of the other issues advanced in this letter. I apologize for the long explanations involved but, we wanted to give you enough information so you can understand where we are coming from.

I want to thank you in advance for taking the time to look over all of this data and hopefully, for agreeing to meet with us or to help us in some way with the impasse between Lake County and Lake Villa.

Sincerely,

Dennis J. Olson

Dennis J. Olson
C&F Packing Co., Inc.

“Exhibit A”

This is an indication of the contribution C&F has made to the Illinois community. If this business has to move somewhere else, we feel it would have a negative financial effect on both Lake Villa and the State.

Short List of Customers

**KFC
Little Caesars'
Uno's Pizza
Home Run Inn Pizza
Sbarro's Pizza**

**Heinz, Corp.
Schwans, Inc. (Tony's Pizza), (Red Barron Pizza), (Fraschetta Pizza), etc.
Best Foods
Custom Foods
Nations Frozen Pizza
Cousin's, Inc.
Great Kitchen's, Inc.
Benardi's, Pizza
D'Lisi Food Systems
Griffith Labs
Kronos Central, Inc.
Vannie Foods**

**Dominicks Food Stores
Roundy's Food Stores
Meijer Foods, Inc.
Copps Food Stores
Rainbow Food Stores
Safeway Food Stores**

**Syso Food Service
Vistar Food Service
Lisanit Food Service
Unilever Foods
Unified Food Service
GFS Food Service
Blue Line Food Service
Market Day**

**Johnsonville, Inc.
Klements, Inc.
Cher Make Sausage Co.
Hans
Gerhard'
PM Pellegrino, Inc.**

EXHIBIT P

This document has been printed on recycled paper.



**PACKING COMPANY
ARCO BRAND**

custom manufacturers of quality food products.

515 PARK AVE., P.O. BOX 209, LAKE VILLA, IL 60046-0209

(847) 245-2000 FAX (847) 245-2100

Mr. Gideon Bluestein
Field Representative
Congress Woman
Melissa L. Bean
Member of Congress
Eighth District of Illinois

September 8, 2005

Gideon,

This additional information should help answer some questions you may have. We greatly appreciate the fact that you came to our office and met with us. Hopefully, this will shed more light on our problems. I am including a copy of the original letter we sent to your office just in case you need it for reference. Along with that will be quite a few other documents connected to this matter. (Over 100 pages). There are way too many pages to e-mail so; I will follow up with the hard copies. This correspondence will precede the documents via e-mail. In the meantime, if you want to discuss any contents of the letter, please give me a call.

Since our meeting nothing has changed with respect to getting all of the parties together. I did receive a telephone message from Mayor Frank Lofferado on Friday August 25th, telling us that he had talked to Suzi Schmidt, who sits on the Lake County Board. She told him she had contacted Peter Kolb who is the director of "The Department of Public Works" for Lake County. She indicated that Peter was working on the permit modification/connection issue and wants to get it resolved. Mayor Lofferado said he would call me after he heard back from Ms. Schmidt. Today is Thursday September 8th and as of yet, I have not heard anything.

Because of the delay at Lake County, we were called before the AG's office on July 22nd and were fined \$35,000.00. I received a telephone call from Mr. Brett Heinrich who, is the lawyer representing us on issues related to the IEPA and the Attorney General's office. He contacted us over two weeks ago to tell us that he had received a call from Paula Wheeler at the Attorney General's office. She was wondering what progress we had made with getting the "Permit Modification" completed. She told him that she had called Mr. Kolb to discuss the issue but, did not reveal any details of their telephone conversation. She reminded Brett that even though Lake County was holding up the paperwork, we still need to get this resolved or, we will continue to be in violation of their "Notice: W-2004-00568". The fine does not make this go away! We remain very concerned and need to get this cleared up ASAP.

In the meantime the Fox Lake "Northwest Regional Water Reclamation Facility" has fined us because our TDS (Total Dissolved Solids) have tested above the new limits. On July 29th, we received a letter telling us that we were in "Significant Noncompliance" and they asked us to provide the "NWR WRF" with a specific "Compliance Schedule". Immediately on July 29th Martin Glab, our engineer, responded with a response to this request called the "C&F Packing TDS Reduction Strategy". Then on August 26th, we received another letter from Mr. Robert E. Ferger accepting our strategy, however, he added deadlines to the specific items outlined in our response. The problem is that it will be physically impossible for us to meet at least one or more of these dates. I am including all of that correspondence and some of the spreadsheets with test results for our wastewater. We have had a couple of high spikes in the TDS but on the whole it has been running very close to the limit even when it tests on the high side. We have checked with other municipalities to find out what their limits are for TDS. Most notably, Milwaukee Wisconsin has no limit for TDS and does not consider it a problem. When talking to Harvey Matyas their Senior Industrial Waste Engineer, he couldn't understand why that should be a problem. I also spoke with the MSD in Chicago and they said that they do not have a limit for TDS. The problem that we have with Fox Lake is that they know our schedules and come early in the morning to take a grab sample. This is not representative of the overall water quality throughout the day. We feel that it is unfair that these tests are based on the grab sample and believe they should be based on a composite sample taken over a 24 hour period. All of this has put a huge financial strain on our company and we have already lost one major customer because of this.

Please contact me with any questions you might have regarding this information. Again, we appreciate you looking into this and I want to thank you, Congress Woman Melissa L. Bean and her office for your help.

Best Regards

Dennis J. Olson
C&F Packing Co., Inc.

EXHIBIT Q

MECKLER BULGER & TILSON LLP

ANNE L. BLUME
BRIAN W. BULGER
JACK J. CARRIGLIO
JOHN K. DALY
JANET R. DAVIS
J. STUART GARBUTT
PAUL R. GARRY
BRENT J. GRABER
REBECCA R. HALLER
BRETT D. HEINRICH
JAMES J. HICKEY
JAMES H. KALLIANIS, JR.
CHRISTOPHER E. KENTRA
PHILIP R. KING
MARI HENRY LEIGH
MICHAEL I. LEONARD
MICHAEL S. LOEFFLER
MICHAEL M. MARICK
KENT MAYNARD, JR.
MICHAEL D. MCCORMICK

BRUCE R. MECKLER
STEVEN D. PEARSON
ALAN D. POSNER
DON R. SAMPEN
SCOTT M. SEAMAN
ERIC D. STUBENVOLL
JOSEPH E. TILSON
JULIE L. TRESTER
MATTHEW R. WILDERMUTH
BRIAN J. WILLIAMS
GEORGENE M. WILSON
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ANDREW D. DALTON
JOHN E. DELASCIO
KAREN M. DIXON
DAVID M. DOLENDI
ELIZABETH J.M. FULTON
JEREMY J. GLENN
J. ROBERT HALL
J. AARON JENSEN
GEORGE K. KATSOUDAS

CHARLOTTE S. KORMENDY
JONATHAN D. LICHTERMAN
ERIC E. LYNCH
JENNIFER M. MCMAHON
ERIC E. NEWMAN
OMAR S. ODLAND
MEAGHAN L. SCHNEIDER
JASON R. SCHULZE
RONALD STEARNEY, JR.
JEROME C. STUDER
ANNA WERMUTH

September 23, 2005

VIA FACSIMILE AND CERTIFIED MAIL

Mr. Peter Kolb

Lake County Public Works Department

650 West Winchester Road

Libertyville, Illinois 60048

Fax 847.377.7173

**Re: C&F Packing Company, Lake Villa - Supplemental Permit Application to revise
IEPA Permit Number 2002-EN-0089-1**

Dear Mr. Kolb:

On January 7, 2005, C&F Packing Company, Inc. delivered a Supplemental Permit Application to revise Illinois Environmental Protection Agency Permit Number 2002-EN-0089-1 (Enclosure 1) to the Lake County Public Works Department offices in Libertyville. That application required you to certify on behalf of the Lake County Public Works Department that:

The sewers to which this project will be a tributary have adequate reserve capacity to transport the wastewater that will be added by the project without causing a violation of the Illinois Environmental Protection Act or Subtitle C, Chapter I...

Aside from the Lake County Public Works Department, the Village of Lake Villa and the Village of Fox Lake, for its Northwest Regional Water Reclamation Facility, were required to make the same certification.

On the copy of the supplemental permit application delivered to you, signatures from the Village of Lake Villa (Section 7.4) and the Village of Fox Lake (Section 7.5) had been obtained, and the signature line in Section 7.4.1 was blank for your signature. We understand that you have refused to sign the supplemental permit application for reasons concerning sewer connection fees that the Lake County Public Works Department believes it is owed. Your linking of the payment of sewer connection fees with the certification of the supplemental permit application is inappropriate.

MECKLER BULGER & TILSON

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September 23, 2005

The Illinois Pollution Control Board regulation that requires your signature on the supplemental permit application states as follows:

Permit applications for sewer construction or modification shall be accompanied by signed statements from the owners of all intermediate receiving sewers and the receiving treatment works certifying that their facilities have adequate capacity to transport and/or treat the wastewater that will be added through the proposed sewer without violating any provisions of the Act and this Chapter.

35 Ill. Admin. Code 309.222(b). This regulation is clearly directed at having responsible officials verify the adequacy of capacity, and not at providing a means to ensure the performance of other local requirements such as the payment of fees.

On February 2, 2002, a few weeks following your receipt of the supplemental permit application, your department prepared a memorandum evaluating the sewer connection fee payment status associated with the C&F (Enclosure 2). It is apparent to us that this memorandum was prepared in response to C&F's request for your signature on the supplemental permit application. Instead of preparing a memorandum evaluating the adequacy of capacity, and recommending approval or disapproval of the application based on that analysis, your department prepared a memorandum on status the payment of sewer connection fees.

We are quite certain that there is adequate capacity. Prior to your receipt of the application, the Village of Fox Lake and the Village of Lake Villa had both signed the application indicating their belief that the capacity is adequate. In your department's February 2, 2002 memorandum, it is reported that the agreed limit for the Village's Southern Interceptor is 11,700 PE, and that the permitted loading inclusive of the discharge amount in C&F's supplemental permit application is 10,848 PE.

Mr. Dennis Olson of C&F has spoken with you on multiple occasions, including at meetings on February 16, 2005 and July 15, 2005, requesting your signature on the supplemental permit application. During those conversations, you admitted that the capacity of the system was adequate, and that you were not certifying the supplemental permit application because of local ordinance concerns.

Your unwillingness to sign the supplemental permit application has frustrated C&F's attempts to resolve a pending enforcement matter with the State. In negotiating a resolution of that matter, C&F Packing committed to the preparation of a supplemental permit application with a subsequent submittal of that application to the Illinois EPA. By withholding of your signature on the supplemental permit application, you have placed C&F in a situation where, to no fault of its own, it is impossible for it to fulfill its commitment to the State.

We ask that you immediately cease linking the supplemental permit application with the sewer connection fee collection issue. Because the supplemental permit application and the applicable regulations only require that you certify that the capacity to transport the wastewater is adequate, we ask that you sign the supplemental permit application immediately and return it

MECKLER BULGER & TILSON

Page 3

September 23, 2005

to C&F, so that C&F can then submit the supplemental permit application to the Illinois EPA. If you advise us that you refuse to sign the supplemental permit application or if you fail to return the supplemental permit application with your signature to C&F within three days of your receipt of this letter, we will understand that Lake County has made a final decision to deny C&F the ability to submit a completed supplemental permit application to the Illinois EPA. We will seek a variance from the Illinois Pollution Control Board to allow for a waiver of the requirements of 35 Ill. Admin. Code 309.222(b) in order to allow for the submittal of the supplemental permit application without your certification.

Sincerely,



Brett D. Heinrich

Enclosures: 1 – Supplemental Permit Application (w/o Appendices)
2 – Lake County Public Works Memorandum (2/2/2005)

cc: Ms. Paula Wheeler, Office of the Illinois Attorney General
Mr. Charles W. Gunnarson, Illinois EPA
Mayor Frank M. Loffredo, Village of Lake Villa
Mr. Dennis Olson, C&F

N:\2333\corres\2005-09-23 Lake County PW re Permit.doc

ENCLOSURE 1

(page 1 of 2)

Illinois Environmental Protection Agency
Permit Section, Division of Water Pollution Control
P.O. Box 19276
Springfield, IL 62794-9276
Application For Permit Or Construction Approval
WPC-PS-1

For IEPA Use:

1. Name and Location: C & F PACKING COMPANY, INC., 515 PARK AVENUE, LAKE VILLA, IL 60046
Name of Project: C & F Packing Company Supplemental Permit Application to revise IEPA Permit Number 2002-EN-0069-1
Municipality or Township: LAKE VILLA County: LAKE

2. Brief Description of Project: Pretreatment Equipment for Wastewater Sources which Processes Cooked Meats to Produce Pizza
Toppings and Soup Bases, Pretreatment Equipment Includes Equalization Tank and Dissolved Air Flotation Gravity Separator.

3. Documents Being Submitted: If the project involves any of the items listed below, submit the corresponding schedule, and check the appropriate spaces.

Table with 2 columns: Project items (Private Sewer Connection/Extension, Sewer Extension Construct Only, etc.) and checkboxes (A/B, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T).

Plans - Title _____ Number of Pages: _____

Specifications: Title _____ Number of Books/Pages: _____

Other Documents (Please Specify) _____

4. Land Trust: Is the project identified in item number 1 herein, for which a permit is requested, to be constructed on land which is the subject of a trust? Yes X No

5. This is an Application for (Check Appropriate Line):
A. Joint Construction And Operating Permit
B. Authorization to Construction (See Instructions) NPDES Permit No. IL00 _____ Issue Date _____
C. Construct Only Permit (Does Not Include Operations)
D. Operate Only Permit (Does Not Include Construction)

6. Certifications and Approval:
6.1 Certificate by Design Engineer (When required; refer to instructions)
I hereby certify that I am familiar with the information contained in this application, including the attached schedules indicated above, and that to the best of my knowledge and belief such information is true, complete, and accurate. The plans and specifications (specifications other than Standard Specifications or local specifications on file with this Agency) as described above were prepared by me or under my direction.

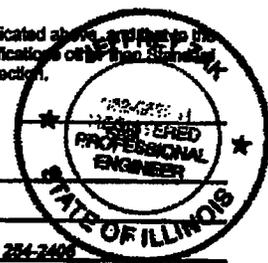
Engineer JEFFREY ZAK 083-052241
Name Registration Number

Firm: SCIENTIFIC CONTROL LABORATORIES, INC.

Address: 3158 SOUTH KOLIN AVENUE

CHICAGO, IL 60623 Phone Number: (773) 284-2400

Signature X [Handwritten Signature]



7. Certifications and Approvals for Permit:
7.1 Certificate by Applicant(s)
I/We hereby certify that I/we have read and thoroughly understand the conditions and requirements of this Application, and am/are authorized to sign this application in accordance with the Rules and Regulations of the Illinois Pollution Control Board. I/We hereby agree to conform with the Standard Conditions and with any other Special Conditions made part of this Permit.

7.1.1 Name of Applicant For Permit to Construct C & F PACKING COMPANY, INC.

515 PARK AVENUE LAKE VILLA IL 60046
Street City State Zip Code

Signature X [Handwritten Signature] DENNIS OLSON 647-245-2000
Printed Name Phone Number

Title CO-OWNER Organization C & F PACKING COMPANY, INC.

(page 2 of 2)

7.1.2 Name Of Applicant For Permit To Own and Operate _____

Street	City	State	Zip Code
--------	------	-------	----------

Signature X _____	Printed Name	Phone Number	
-------------------	--------------	--------------	--

Title _____

7.2 Attested (Required When Applicant is a Unit of Government)

Signature X _____	Date _____	Title _____	
-------------------	------------	-------------	--

(City Clerk, Village Clerk, Sanitary Clerk, Etc.)

7.3 Applicants from non-governmental applicants which are not signed by the owner, must be signed by a principal executive officer of at least the level of vice president, or a duly authorized representative.

7.4 Certificate By Intermediate Sewer Owner

I hereby certify that (Please check one):

1. The sewers to which this project will be tributary have adequate reserve capacity to transport the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

Name and location of sewer system to which this project will be tributary: N 4739 95 / E 608 134Sewer System Owner VILLAGE OF LAKE VILLA

<u>65 CEDAR STREET</u>	<u>LAKE VILLA</u>	<u>ILLINOIS</u>	<u>60048</u>
Street	City	State	Zip Code

Signature X _____ Date _____ Title MAYOR

7.4.1 Additional Certificate By Intermediate Sewer Owner

I hereby certify that (Please check one):

1. The sewers to which this project will be tributary have adequate reserve capacity to transport the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

Name and location of sewer system to which this project will be tributary: Northwest Interceptor NW SewerSewer System Owner Lake County Public Works

<u>650 Winchester Road</u>	<u>Libertyville</u>	<u>Illinois</u>	<u>60048</u>
Street	City	State	Zip Code

Signature X _____ Date _____ Title _____

7.5 Certificate By Waste Treatment Works Owner

I hereby certify that (Please check one):

1. The waste treatment plant to which this project will be tributary has adequate reserve capacity to treat the wastewater that will be added by this project without causing a violation of the Environmental Protection Act or Subtitle C, Chapter I, or
2. The Illinois Pollution Control Board, in PCB _____ dated _____, granted a variance from Subtitle C, Chapter I to allow construction facilities that are subject to this application.

I also certify that the industrial waste discharges described in the application is capable of being treated by the treatment works.

Name and location of waste treatment works to which this project is tributary: NWR WRFTreatment Works Owner VILLAGE OF FOX LAKE

<u>200 INDUSTRIAL DRIVE</u>	<u>FOX LAKE</u>	<u>ILLINOIS</u>	<u>60020</u>
Street	City	State	Zip Code

Signature X _____ Date _____ Title _____

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

FOR IEPA USE:
LOG #
DATE RECEIVED

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, Illinois 62794-9276

SCHEDULE G SLUDGE DISPOSAL & UTILIZATION

1. Name of Project C & F Packing Company Supplemental Permit Application to Revise IEPA Permit Number 2002-EN-0089-1
2. General Information
- 2.1 Source(s) Wastewater from the Cleaning and Sanitation of Meat Processing Equipment
- 2.2 Production Volume per year Oil = 312,000 lbs Tons per year Oil = 156 tpy
Sludge = 624,000 lbs Sludge = 312 tpy
- 2.3 Sludge to be disposed of is: Liquid Dry _____
- 2.4 Sludge is: Aerobically digested _____ Anaerobically digested _____ Heat anaerobically digested _____ Raw _____ Chemically Stabilized _____
Composted _____ Wastewater Lagoon _____ WTP Lime _____ WTP Alum _____ WTP Iron _____ Other If other, describe Oil/Grease/Sludge
Mixture _____, If mixture, describe _____
- 2.5 Is the sludge defined as hazardous by State or Federal Law? _____ YES NO. If yes, basis _____
- 2.6 Is sludge to be stored on the STP site? _____ YES NO. If yes, type of storage, lagoon _____ storage tank _____ other _____
If other, describe _____ capacity of storage, _____ cu. ft.
- 2.7 Sludge Hauling
- 2.7.1 Name(s), address(es) and Illinois Transporters I.D. Numbers SLUDGE: BYTEC, 1037 8th STREET, MONROE, WI 53586 (ID #2831)
OIL: ANAMEX, 606 BASSETT ST., DEFOREST, WI 53532
- 2.7.2 For industrial generators, has Illinois Generator Number and Authorization Number been issued? _____ YES NO. If no, contact the Division
of Land Pollution Control
- Illinois Generator ID Number 0970845054
- Authorization Number NA
3. Methods of Sludge Disposal and/or Utilization
- 3.1 Land Application
- 3.1.1 Indicate the number of dry tons of sludge per year to be disposed by each of the following methods:
Agricultural Land _____, Commercial Fertilizer Production , Dedicated Land Disposal _____, Disturbed Land Reclamation _____, Silviculture _____,
Horticultural Lands _____, Public Distribution _____, Other _____, If other, specify _____
- 3.1.2 Sludge Disposal Site Location. Provide a map (USGS Quadrangle map or plat map) showing location.
Name of USGS Quadrangle (7.5 or 15 minute) or plat map All Sludge is sent to Bytec of Monroe, WI.
- 3.1.3 Provide soil survey map and soil description for disposal site. Identify name of soil survey and map sheet number for each soil survey map provided.

* All 312 tpy of sludge is hauled away by Bytec and used to make fertilizer

3.1.4 Is sludge to be stored at disposal site? YES NO. If yes, describe and state the storage volume _____ cubic feet

3.1.5 Provide a copy of sludge user information sheet and completed, signed copies for any known users.

3.1.6 In a narrative description provide operation practices and design features to prevent ground and/or surface water pollution, portable water supply wellhead protection and other buffer distances, calculations supporting storage capacity, total acres available, soil characteristics, operational contingencies, etc.

All sludge is sent to Bytes of Monroe, WI

3.1.7 Submit calculations of sludge application rate for agronomic rate, organic loading, and metal loading rate.

3.2 Landfilling NA

3.2.1 Sanitary Landfill Special Waste Landfill Hazardous Waste Landfill Other If other, specify _____

3.2.2 Name and Location of Landfill(s) _____

3.2.3 IEPA Permit Number(s) _____ ; _____ ;

3.3 Incineration NA

3.3.1 Name and Location _____

3.3.2 IEPA Permit Number(s) _____ ; _____ ;

3.3.3 Ultimate Disposal of Incinerator Residue _____

** OTHER: Oil is sold to & hauled by a rendering company, Anamax of Deforest WI, which sells the rendered material to companies who manufacture cosmetic products.

4. Sludge Characteristics

Submit complete analyses of sludge characteristics in mg/kg dry wt. basis unless otherwise indicated. The analyses shall be performed unless the sludge is disposed of by incineration or at an off-site landfill. Analyses performed shall include but not be limited to the parameters below:

Parameter	Parameter
% TS	Sulfur
% VS	Aluminum (total)
COD mg/l	Arsenic (total)
pH	Barium (total)
BOD5 mg/l	Cadmium (total)
Acidity meq of CaCO3 at pH _____	Cobalt (total)
Alkalinity meq CaCO3 at pH _____	Chromium, hex (total)
Oil and Grease mg/l	Chromium (total)
Phenols mg/l	Copper (total)
Cyanide	Iron (total)
Sulfate (total) mg/l	Mercury (total)
Sulfide (total) mg/l	Manganese (total)
Sodium	Molybdenum (total)
EC mmhos/cm	Nickel (total)
TOC	Lead (total)
Ammonia mg/l	Selenium (total)
Total Kjeldahl Nitrogen mg/l	Vanadium (total)
Phosphorus	Zinc (total)
Potassium	Radium 226 pCi/g
% Volatile Acids, if anaerobically digested	Radium 228 pCi/g
	Other*

*Include results of any hazardous waste characteristics tests performed for: 1) EP Toxicity, 2) Corrosivity, 3) Ignitability, and 4) Reactivity

7.1 Design population equivalent (one population equivalent is 100 gallons of wastewater per day, containing 0.17 pounds of BOD₅ and 0.20 pounds of suspended solids:
 BOD 5800 (Actual Maximum); Suspended Solids 1570 (Actual Maximum); Flow 2180 (Actual Maximum)
 7.2 Design Average Flow Rate 175 gpm; 252,000 gpd (Based on 24 hours per day) MGD.
 7.3 Design Maximum Flow Rate 175 gpm; 252,000 gpd (Based on 24 hours per day) MGD.
 7.4 Design Minimum Flow Rate 0 MGD.
 7.5 Minimum 7-day, 10-year low flow NA cfs _____ MGD.
 Minimum 7-day, 10-year flow obtained from NA

7.6 Dilution Ratio NA; _____

8. FLOW TO TREATMENT WORKS (if existing):

8.1 Flow (last 12 months)
 8.1.1 Average Flow NA MGD
 8.1.2 Maximum Flow NA MGD

8.2 Equipment used in determining above flows _____

9. Has a preliminary engineering report for this project been submitted to this Agency for Approval?
 YES NO X If so, when was it submitted and approved. Date Submitted _____
 Certification # _____
 Dated _____

10. List Permits previously issued for the facility: 2002-EN-0089, 2002-EN-0089-1

11. Describe provisions for operation during contingencies such as power failures, flooding, peak loads, equipment failure, maintenance, shut-downs and other emergencies.
The Pretreatment system will not operate under any of the above conditions.

12. Complete and submit Schedule G if sludge disposal will be required by this facility.

13. WASTE CHARACTERISTICS: Schedule N must be submitted.

14. TREATMENT WORKS OPERATOR CERTIFICATION: List names and certification numbers of certified operators:
Greg Rytzer

This Agency is authorized to require this information under Illinois Revised Statutes, 1978, Chapter 18 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

FOR IEPA USE:
LOG #
DATE RECEIVED:

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF WATER POLLUTION CONTROL
PERMIT SECTION
Springfield, IL 62706

SCHEDULE N WASTE CHARACTERISTICS

1. Name of Project C & F Packing Company Supplemental Permit Application to Revise IEPA Permit Number 2002-EN-0089-1

	EXISTING	PROPOSED-DESIGN
2.1 Average Flow (gpd)	<u>144,000</u>	<u>252,000*</u>
2.2 Maximum Daily Flow (gpd)	<u>216,000</u>	<u>252,000*</u>

2.3 TEMPERATURE * based on a 24 hour work day

Time of year	Ave. Intake Temp. F	Ave. Effluent Temp. F	Max. Intake Temp. F	Max. Effluent Temp. F	Max Temp Outside Mixing Zone F
SUMMER	<u>NA</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
WINTER	<u>NA</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

2.4 Minimum 7-day, 10-year flow: NA cfs MGD.

2.5 Dilution Ratio: NA ;

2.6 Stream flow rate at time of sampling NA cfs MGD.

3. CHEMICAL CONSTITUENT Existing Permitted Conditions ; Existing conditions X; Proposed Permitted Conditions

Type of sample: grab (time of collection); composite (Number of samples per day)

(see instructions for analyses required)

Constituent	RAW WASTE (mg/l)	TREATED EFFLUENT Avg. (mg/l) Max.	UPSTREAM DOWNSTREAM SAMPLES
Ammonia Nitrogen (asN)	NTF	50.0	NA
Arsenic (Total)	NTF	NTF	NA
Barium	NTF	NTF	NA
Boron	NTF	NTF	NA
BOD ₅	> 1000	550	NA
Cadmium	NTF	NTF	NA
Carbon Chloroform Extract	NTF	NTF	NA
Chloride	NTF	NTF	NA
Chromium (total hexavalent)	NTF	NTF	NA
Chromium (total trivalent)	NTF	NTF	NA
Copper	NTF	NTF	NA
Cyanide (total)	NTF	<0.03	NA
Cyanide (readily released 150°F & pH 4.5)	NTF	NTF	NA
Dissolved Oxygen	NTF	NTF	NA
Fecal Coliform	NTF	NTF	NA

	RAW WASTE (mg / l)	TREATED EFFLUENT Avg. (mg / l) Max.	UPSTREAM (mg / l)	DOWNSTREAM SAMPLES (mg / l)
Fluoride	NTF	NTF	NA	NA
Hardness (as CaCO ₃)	NTF	NTF	NA	NA
Iron (total)	NTF	0.50	NA	NA
Lead	NTF	NTF	NA	NA
Manganese	NTF	NTF	NA	NA
MBAS	NTF	NTF	NA	NA
Mercury	NTF	NTF	NA	NA
Nickel	NTF	NTF	NA	NA
Nitrates (as N)	NTF	NTF	NA	NA
Oil & Grease (hexane solubles or equivalents)	300	<50	NA	NA
Organic Nitrogen (as N)	NTF	NTF	NA	NA
pH	<2.0	7-9	NA	NA
Phenols	NTF	NTF	NA	NA
Phosphorous (as P)	NTF	15.0	NA	NA
Radioactivity	NTF	NTF	NA	NA
Selenium	NTF	NTF	NA	NA
Silver	NTF	NTF	NA	NA
Sulfate	NTF	NTF	NA	NA
Suspended Solids	1000	175	NA	NA
Total Dissolved Solids	**	**	NA	NA
Zinc	NTF	NTF	NA	NA
Others				
** Treatment System not designed to remove TDS				

ENCLOSURE 2

TO: Peter Kolb
 FROM: Dennis Price / Chuck Degrave
 SUBJECT: Lake Villa Agreement / Village Southern Interceptor
 DATE: February 2, 2005

CF Packing Permit

CF Packing has requested a revised permit for increasing of existing flows, due to an IEPA audit. Based on our review of the Original 2001 permit, average daily flows were at 48,000 gpd; in addition the total maximum design flow was 327,000 gpd. A total of \$37.8K was collected for this permit. In 2002 an amended permit came in and existing average daily flows increased to 69,000 gpd however the total flow based on design decreased to 283,000 gpd. No additional fees were collected at that time.

We now have a revised permit application in review, which again increases the existing average daily flow to 147,000 gpd but decreases the maximum design flow to 255,000 gpd. The design Engineer for CF Packing has stated that the maximum design flow reductions are due to a dissolve air floatation system. This system cannot handle the supplier published flow rate as originally calculated in 2001. The new average daily flows are based off of 2004 water bills. A max day rate of 216,000 gpd is based on CF Packing's internal process flow meter.

CF Packing's permit fee is based on an average daily flow of 147,000 gpd. The total fee for this flow is 588 RE at \$1800 per RE equals **\$1,058,400**. Assuming that all previous permits have been finalized, the fee for just this revised permit would be (147,000 - 69,000) or 312 RE at \$1800 per RE equals **\$561,600**.

	Original Permit 2001	Amended Permit 2002	Current Permit Application 2005
Design Process Flow	324,000 gpd	280,000 gpd	255,000 gpd
Non process Flow	3000 gpd	3000 gpd	3000 gpd
Average Daily Flow	45,000 gpd	66,000 gpd	144,000 gpd
Total Ave Daily Flow	48,000 gpd	69,000 gpd	147,000 gpd
Fees Paid by Lake Villa	\$37,000	\$0	

Prairie Trails Permit

The Prairie Trails subdivision has been submitted for review. Prairie Trails Subdivision is tributary to the Lake Villa Southern Interceptor. The subdivision is located in both the Lakes Region Sanitary District and the Lake Villa Village Service Area. The calculated PE loading for this subdivisions is 577.5 PE.

Village Sewer Agreement

Per the above reference agreement Lake County and Lake Villa have an agreed limit of 11,700 PE for the Village Southern Interceptor.

At present we have two IEPA permit applications, which would be tributary to the interceptor, CF Packing and Prairie Trails Subdivision.

The permitted loading for the interceptor without the CF Packing flow is at 8801 PE. Adding the 1470 PE for CF Packing brings the permitted loading for the Village Southern Interceptor to 10,271 PE. Adding the 577 PE for Prairie Trails Subdivision brings the permitted loading for the interceptor to 10,848 PE.

Summary

The CF Packing permit application should be modified to reflect the 1470 PE loading. The additional fee of \$561,600 will need to be addressed and collected.

The permit loading for the Village Sewer Agreement is at 93% of the agreed limit. A discussion with the Village is required to address this issue for future permit capacity.

I suggest we discuss this issue internally and then arrange a meeting with Lake Villa to bring them up to speed on the situation.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Peter Kolb
Lake County Public Works Department
650 West Winchester Road
Libertyville, Illinois 60048

COMPLETE THIS SECTION ON DELIVERY

A. Signature <input checked="" type="checkbox"/> <i>T. Miller</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
B. Received by (Printed Name) <i>T. Miller</i>	C. Date of Delivery <i>9/26/05</i>
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	

3. Service Type

<input checked="" type="checkbox"/> Certified Mail	<input type="checkbox"/> Express Mail
<input type="checkbox"/> Registered	<input checked="" type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Insured Mail	<input type="checkbox"/> C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number
(Transfer from service label)

7002 0860 0005 1298 0099

EXHIBIT R

MICHAEL J. WALLER
STATE'S ATTORNEY

OFFICE OF THE
STATE'S ATTORNEY

Lake County, Illinois

TELECOMMUNICATIONS MEMORANDUM

DATE: September 29, 2005 Pages Including Cover Sheet: 3

TO:

Mayor Frank M. Loffredo
Village of Lake Villa (847) 356-6217

Peter Kolb, Superintendent
Lake County Public Works (847) 377-7173

Paula Wheeler, Office of
the Attorney General (312) 814-2347

Charles Gunnerson, IEPA (217) 782-9807

Howard Teegen, Attorney
Village of Fox Lake (847) 587-4538

MESSAGE FROM: Daniel L. Jasica, Assistant State's Attorney

PHONE NUMBER: (847) 377-3050

TELECOPIER NO: (847) 360-0661

COMMENTS: Letter to Brett Heinrich (C & F Packing Company, Lake
Villa) dated September 29, 2005

If any difficulty is experienced with this transmission, please
call: LIZ at Phone No: (847) 377-3050

THE INFORMATION CONTAINED IN THIS TRANSMISSION IS CONFIDENTIAL
AND INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHOM
IT IS ADDRESSED. IF THE READER OF THIS IS NOT THE INTENDED
RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION,
DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY
PROHIBITED AND ARE REQUESTED TO IMMEDIATELY CONTACT THE SENDER
FOR INSTRUCTIONS CONCERNING THE RETURN OF THIS TRANSMISSION.



OFFICE OF THE
STATE'S ATTORNEY
 LAKE COUNTY, ILLINOIS
MICHAEL J. WALLER
 STATE'S ATTORNEY

Lake County Building
 18 N. County Street
 Waukegan, Illinois 60085-4363
 (847) 377-3000 Main/Felony Fax (847) 360-1538
 Misdemeanor/Traffic Fax (847) 625-7129
 September 29, 2005

Via Facsimile Transmittal
 (312) 474-7898
 Brett D. Heinrich
 Meckler, Bulger & Tilson LLP
 123 North Wacker Drive
 Suite 1800
 Chicago, IL 60606

Re: C & F Packing Company, Lake Villa

Dear Mr. Heinrich:

I represent the Lake County Public Works Department and, in that capacity, your September 25, 2005, letter to Superintendent Peter Kolb has been forwarded to me for review and response. As you correctly note in your letter, pursuant to the 1991 County/Lake Villa "Agreement for Sewage Disposal," the County is currently owed a considerable amount of connection fees (approximately \$459,000) relating to C & F Packing's current operation in Lake Villa as authorized under the original 2001 and 2002 amended IEPA permits. To date, neither C & F Packing nor Lake Villa have remitted this amount. Under these circumstances, the County categorically denies that it has any obligation to sign the IEPA and thereby agree to accept *additional* flows from C & F Packing's facility when Lake Villa remains so far in arrears on its connection fees under the Agreement.

Now, C & F Packing seeks to expand its permitted average daily flows from 69,000 gpd to 147,000 gpd. Because of the obvious impacts of this additional flow on the County and Fox Lake systems, Superintendent Kolb has repeatedly sought written acknowledgment and confirmation from C & F Packing and Lake Villa that the outstanding connection fees due under the County/Lake Villa Agreement are owed and will be paid and that the additional connection fees due in connection with the expansion under the proposed amended IEPA permit (an estimated \$561,000) will be paid per the Agreement. To date, no such written acknowledgment

Felony Review Division
 Robert H. Babcox
 Justice Center
 20 S. County Street
 Waukegan, IL 60085
 (847) 377-3025
 Fax - (847) 263-6179

Civil Division
 18 N. County Street
 Waukegan, IL 60085
 (847) 377-3050
 Fax - (847) 360-0661

Child Support Enforcement
 33 N. County Street
 Waukegan, IL 60085
 (847) 360-6538
 Fax - (847) 360-1097

Children's Advocacy Center
 323 N. West Street
 Waukegan, IL 60085
 (847) 360-6870
 Fax - (847) 360-6850

Juvenile Trial Division
 Robert W. Depke
 Juvenile Justice Complex
 24647 N. Milwaukee Avenue
 Vernon Hills, IL 60061
 (847) 377-7850
 Fax - (847) 634-8831

PCB 2006-053

Brett D. Heinrich
September 29, 2005
Page 2

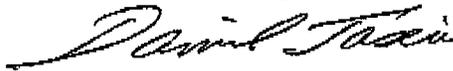
or confirmation has been forthcoming. And, in fact, your letter completely ignores the serious questions that exist regarding future performance under the Agreement with respect to the C & F Packing facility. It is for this reason that the County has requested such confirmation from C & F Packing and the Village relating to this project before processing the current application for an IEPA permit.

Additionally, from a practical standpoint, as has been previously pointed out to your client and the Village by Mr. Kolb, the County in fact retains less than 17% of the charged connection fee under the County/Lake Villa Agreement and the County component of the connection fee is the same today as it was when the County/Lake Villa Agreement was first executed. The remaining 83% is the current connection fee charged by Fox Lake for its treatment services. Accordingly, in response to your client's prior inquiries as to what steps can be taken to resolve the current impasse, I reiterate the County's willingness to sit down with representatives from C & F Packing, Lake Villa, and Fox Lake to discuss the payment of connection fees, including consideration of a payment plan acceptable to Fox Lake.

Lastly, your letter makes reference to seeking a waiver of the requirement that Lake County Public Works, as an intermediate sewer owner, execute the proposed IEPA permit. However, it must first be noted that the IEPA regulations make no provision for such a waiver in these circumstances. Moreover, the County would vehemently oppose any such potential waiver. C & F Packing is one of the largest single users of County transport and Fox Lake treatment services, and C & F Packing has proven to be one of the most problematic and costly users of County transport and Fox Lake treatment services. Therefore, from the County's perspective, it would be unconscionable for IEPA to assist C & F Packing in avoiding the payment of its fair share of the costs and expenses needed to construct and maintain these public improvements by granting such a waiver.

Very truly yours,

MICHAEL J. WALLER
State's Attorney of Lake County



DANIEL L. JASICA
Chief, Civil Trial Division

DLJ/lp

cc: Mayor Frank M. Loffredo, Village of Lake Villa
Peter Kolb, Superintendent, Lake County Public Works
Paula Wheeler, Office of the Attorney General
Charles Gunnerson, IEPA
Howard Teegen, Attorney for Village of Fox Lake

EXHIBIT S

* * * * * PCB 2006-053 * * * * *

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
WATER POLLUTION CONTROL PERMIT**

LOG NUMBERS: 2252-02

PERMIT NO.: 2002-EN-0089-1

**FINAL PLANS, SPECIFICATIONS, APPLICATION
AND SUPPORTING DOCUMENTS**
PREPARED BY: Scientific Control Laboratories, Inc.

DATE ISSUED: December 24, 2002

SUBJECT: C & F PACKING COMPANY -- Sewer Connection and Construction of Pretreatment System - Tributary to Fox Lake NWRWRF

PERMITTEE TO CONSTRUCT

C & F Packing Company, Inc.
515 Park Avenue
Lake Villa, Illinois 60046

Supplemental permit is hereby granted to the above designated permittee(s) to construct and/or operate water pollution control facilities, which were previously approved under Permit #2002-EN-0089 dated February 13, 2002. These facilities have been revised as follows:

A sewer connection consisting of approximately 231 feet of 6-inch PVC sewer pipe, approximately 530 feet of 8-inch PVC sewer pipe, and four manholes, a pretreatment system consisting of an 18,000 gallon equalization tank with pH adjustment, an 18,000 gallon dissolved air flotation unit, three 5000 grease/sludge holding tanks, and a 1,900 gallon sump tank, a 250 gallon collection bin, and all the pipes, pumps, and appurtenances necessary for the pretreatment of food processing wastewaters at a design flowrate of 280,800 gpd DAF and 374,000 gpd DMF. The actual flow consist of 3000 gpd ave (30 P.E.) of sanitary wastewater, and 66,000 gpd ave (972 P.E.) (100,000 gpd max) of process wastewater. Total loading for the project is 1002 P.E. Discharge is tributary to the Fox Lake NWRWRF.

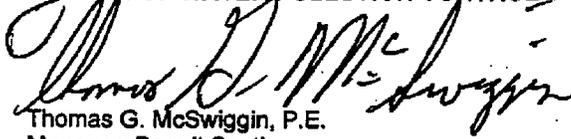
This Supplemental Permit supersedes and replaces the previous permit listed above. All Standard and Special conditions and provisions of the original permit are hereby made a part of this permit unless specifically deleted or revised in this permit.

THE STANDARD CONDITIONS OF ISSUANCE INDICATED ON THE REVERSE SIDE MUST BE COMPLIED WITH IN FULL. READ ALL CONDITIONS CAREFULLY.

TGM:DEL:008902a.wpd

cc: EPA - DesPlaines FOS
Scientific Control Laboratories, Inc.
Village of Fox Lake NWRWRF
Records - Municipal
Records - Industrial
Binds
Village of Lake Villa
Lake County Public Works

DIVISION OF WATER POLLUTION CONTROL


Thomas G. McSwiggin, P.E.
Manager, Permit Section

**READ ALL CONDITIONS CAREFULLY:
STANDARD CONDITIONS**

The Illinois Environmental Protection Act (Illinois Revised Statutes Chapter 111-12, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

1. Unless the construction for which this permit is issued has been completed, this permit will expire (1) two years after the date of issuance for permits to construct sewers or wastewater sources or (2) three years after the date of issuance for permits to construct treatment works or pretreatment works.
2. The construction or development of facilities covered by this permit shall be done in compliance with applicable provisions of Federal laws and regulations, the Illinois Environmental Protection Act, and Rules and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification of the project, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The permittee shall allow any agent duly authorized by the Agency upon the presentations of credentials:
 - a. to enter at reasonable times, the permittee's premises where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit;
 - b. to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit;
 - c. to inspect at reasonable times, including during any hours of operation of equipment constructed or operated under this permit, such equipment or monitoring methodology or equipment required to be kept, used, operated, calibrated and maintained under this permit;
 - d. to obtain and remove at reasonable times samples of any discharge or emission of pollutants;
 - e. to enter at reasonable times and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
 - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located;
 - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities;
 - c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations;
 - d. does not take into consideration or attest to the structural stability of any units or parts of the project;
 - e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
6. Unless a joint construction/operation permit has been issued, a permit for operating shall be obtained from the agency before the facility or equipment covered by this permit is placed into operation.
7. These standard conditions shall prevail unless modified by special conditions.
8. The Agency may file a complaint with the Board for suspension or revocation of a permit:
 - a. upon discovery that the permit application contained misrepresentations, misinformation or false statement or that all relevant facts were not disclosed; or
 - b. upon finding that any standard or special conditions have been violated; or
 - c. upon any violation of the Environmental Protection Act or any Rules or Regulation effective thereunder as a result of the construction or development authorized by this permit.

EXHIBIT T

STATE OF ILLINOIS)
) SS.
COUNTY OF LAKE)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

C&F PACKING COMPANY, INC., an)
Illinois corporation,)

Petitioner,)

v.)

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY and LAKE)
COUNTY,)

Respondents.)

PCB 05-_____
(Variance Petition)

AFFIDAVIT OF DENNIS J. OLSON

I, Dennis J. Olson, having been duly sworn upon oath, do hereby state and depose as follows:

1. I am Secretary/Treasurer of C&F Packing Company, Inc. ("C&F Packing"), whose facility is located at 515 Park Ave., Lake Villa, Illinois. My wife Mary Ann Olson, has been an owner of C&F Packing since 1973 with me representing the Olson interest in C&F Packing for over 30 years.

2. I have read the Petition for Variance and based upon my personal knowledge and belief, the facts stated therein are true and correct.

3. I have reviewed the exhibits attached to the Petition for Variance and based on my personal knowledge and belief, they are true and accurate copies.

FURTHER AFFIANT SAYETH NOT.


DENNIS J. OLSON

SUBSCRIBED and SWORN to
before me this 27th day of
October, 2005.


NOTARY PUBLIC

