

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:

PROPOSED AMENDMENTS TO) R22-18(A)
GROUNDWATER QUALITY) (Rulemaking – Public Water Supplies)
35 ILL.ADM.CODE 620)
)

**PRE-FILED ANSWERS OF BRAD HUNSBERGER ON BEHALF OF
LAND AND LAKES COMPANY**

Land and Lakes Company, by and through its attorneys, hereby submits answers of Brad Hunsberger to the following questions from the Illinois Pollution Control Board:

18. *On page 1, you raise concerns of how Part 807 landfills will fund PFAS monitoring and remediation specifically about Land and Lakes landfill 1 & 2, but also generally about Part 807 landfills and monitoring, corrective action and costs associated with those landfills.*

a. *Did Land and Lakes landfill 1 & 2 generate revenue during its active life? If so, how much revenue did it generate until its closure in 1994?*

ANSWER: Yes. However, Land and Lakes Company has no financial records retained for that operating period, which would have been from the 1970s to 1994. I also don't know why the amount of revenue generated 30, 40 or 50 years ago is relevant to this proceeding. Land and Lakes 1 & 2 landfill closed in 1994 and has not generated any revenue from waste disposal in over 30 years, while continuing to incur expenses at the site every year since closure.

19. *On page 2, you state that there are 97 Part 807 solid waste landfills in Illinois, of which 63 are conducting postclosure care and 34 are closed but awaiting closure certification.*

a. *Are any of the 97 Part 807 landfills located within close proximity of drinking water well setback zones or over Class I groundwater aquifers like Mahomet aquifer?*

ANSWER: I do not have immediate access to this information. The question may be better posed to the Illinois EPA.

b. *If so, should these landfills be required to monitor for PFAS to protect drinking water sources?*

ANSWER: The Board has not defined what it means by “close proximity.” I am also not aware of the exact locations of the setback zones and associated hydrogeologic characteristics.

Any such requirement would need to be carefully considered and based on data.

c. *Regarding the 34 closed landfills awaiting certification, are you aware of why these landfills are not certified as closed?*

ANSWER: I do not know why all of these landfills are not certified as closed and do not want to speculate. The question may be better posed to the Illinois EPA.

Dated: August 11, 2025

Respectfully submitted,

LAND AND LAKES COMPANY

BY: /s/ Ann M. Zwick

One of its attorneys

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NOTICE OF ELECTRONIC FILING

TO: ALL PARTIES ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on August 11, 2025 , **Land and Lakes Company** electronically filed with the Office of the Clerk of the Illinois Pollution Control Board the PRE-FILED ANSWERS OF BRAD HUNSBERGER ON BEHALF OF LAND AND LAKES COMPANY a copy of which is hereby served upon you.

Dated: August 11, 2025

Respectfully submitted,

LAND AND LAKES COMPANY

BY: /s/ Ann M. Zwick

One of its attorneys

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CERTIFICATE OF E-MAIL SERVICE

The undersigned attorney certifies that she served a copy of the foregoing PRE-FILED ANSWERS OF BRAD HUNTSBERGER ON BEHALF OF LAND AND LAKES COMPANY, to the above-listed parties, by sending a copy to the email addresses designated above on or before 4:30 p.m. on August 11, 2025.

/s/ Ann M. Zwick

One of the Attorneys for Land and Lakes Company