

ILLINOIS POLLUTION CONTROL BOARD  
September 10, 2025

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

## **HEARING OFFICER ORDER**

The rescheduled hearing for this sub-docket is set for September 16, 2025. The Board has prepared several written follow up questions, attached to this hearing officer order. These questions are non-exhaustive, and the Board and its staff may have additional questions during the hearing.

All filings in this proceeding will be available on the Board's website at <https://pcb.illinois.gov/> in the rulemaking docket [R22-18A](#). Unless the Board, hearing officer, Clerk, or procedural rules provide otherwise, all documents in this proceeding must be filed electronically through the [Clerk's Office On-Line](#). 35 Ill. Adm. Code 101.302(h), 101.1000(c), 101. Subpart J.

IT IS SO ORDERED.

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Hearing Officer  
Illinois Pollution Control Board  
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**R22-18(A): Amendments to Part 620 Groundwater Quality Standards****Questions for the Illinois Environmental Protection Agency (IEPA)**

1. IEPA states that it “does not believe the recent adoption of Class I and Class II groundwater quality standards in Part 620 for six PFAS constituents renders compliance with Parts 811 and 814 technically or economically infeasible and the Agency supports removal of the exemptions in Sections 620.410(f) and 620.420(e) for landfills subject to Part 811 or Part 814.” 07/25/25 IEPA Resp. at 2.
  - a. Please comment on whether IEPA’s belief regarding economic reasonableness extends to Part 807 landfills, which stopped accepting wastes more than 30 years ago.
  - b. Given that the Part 807 landfills were required to initiate closure by October 1994 without conducting any groundwater impact assessment or liner upgrades, comment on the technical feasibility of these landfills to comply with Part 620 PFAS standards.
2. In the main docket of this rulemaking, while addressing the “immediate impact” of adopting the PFAS groundwater quality standards, IEPA stated that it agreed with the Board’s conclusion at first notice,

“For facilities that may be impacted by the groundwater standards, ***compliance and any potential remediation*** will be addressed under specific programs like Part 811 and 814 landfills, the Site Remediation Program and the Underground Storage Tank program. Following the adoption of the proposed amendments to Part 620, ***the Agency will identify and develop amendments needed in other rules addressing specific programs***. Additionally, where appropriate, regulatory relief mechanisms such as the adjusted standard process are available. PCB R22-18, First Notice at 68 (March 7, 2024). PC 78 at 19 (emphasis added).

- a. If the Board finds the application of Part 620 PFAS standards to Parts 807, 811 and 814 landfills to be economically reasonable and removes the landfill exemptions at 35 Ill. Adm. Code 620.410(f) and 620.420(e), please comment on whether IEPA still plans to identify, and develop amendments to address “compliance and potential remediation” issues associated with landfills subject to Parts 807, 811, and 814.
- b. If so, please describe the potential changes to the existing rules (Parts 807, 811, and 814) that IEPA is considering to address compliance and remediations issues associated with implementation of Part 620 PFAS standards.
- c. Would it be possible to consider any potential changes to the landfill rules in this rulemaking?

3. In response to Board questions 8c and 8d regarding the 34 closed Part 807 landfills awaiting closure certification, IEPA states that groundwater monitoring is required at these landfills in accordance with their respective operating permits and PFAS constituents specified in Part 620 must be monitored annually along with all other Part 620 constituents. 8/12/25 IEPA Resp. at 12.
  - a. Please comment on whether IEPA will have to modify the operating permits of the closed landfills to implement annual PFAS monitoring at these sites.
  - b. If so, would PFAS monitoring further delay the closure certification of the closed landfills?
  - c. Please comment on whether IEPA has reached out to the owners or operators of closed Part 807 landfills regarding PFAS monitoring.
4. IEPA states that 63 closed Part 807 landfills conducting postclosure monitoring would be required to monitor PFAS as a part of their routine quarterly/semiannual/annual groundwater monitoring as there is no exemption provided in Part 620. 8/12/25 IEPA Resp. at 13.
  - a. Please comment on whether IEPA will have to modify the operating permits of the closed landfills conducting postclosure care to implement PFAS monitoring.
  - b. If so, comment on whether IEPA has reached out to the owners or operators of affected landfills regarding PFAS monitoring.
5. In response to Board question 8b regarding facilities owned by private companies and those owned by municipalities, IEPA stated that “the Agency has records reflecting landfill ownership information for Part 807 landfills. Although the Agency maintains these records, ownership changes during the life of these landfills are not readily available.” 8/12/25 IEPA Resp. at 12. Would it possible for the Agency to access the ownership records and provide a list of Part 807 landfills owned by private companies and municipalities?
6. Considering that Part 807 landfills were required to begin closure under 35 Ill. Adm. Code Part 814.501 by October 1994,
  - a. Please explain why so many of them are still in postclosure care or not certified as closed.
  - b. If compliance with Part 620 standards is the main issue for continued groundwater monitoring at these facilities, comment on how many of these landfills are in assessment monitoring or conducting corrective action.

- c. Has IEPA approved groundwater management zones (GMZs) for any Part 807 landfills to address groundwater contamination? If so, please submit any available GMZ information.
- 7. In response to Board question 8h, IEPA states, “under Section 21.1 of the Illinois Environmental Protection Act and 35 Ill. Adm. Code 807.601(a), the State, its agencies, and units of local government are exempt from financial assurance requirements for closure and post-closure care of Part 807 landfills.”
  - a. Please clarify whether the exemption also applies to any corrective action at Part 807 landfills.
  - b. Comment on whether groundwater monitoring and corrective action related to PFAS would place a significant financial burden on municipalities/local governments that own Part 807 landfills, especially since they are not required to have financial assurance.