

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

BFI WASTE SYSTEMS)
OF NORTH AMERICA, LLC,)
Petitioner,)
v.) PCB No. 26-30
ILLINOIS ENVIRONMENTAL) (Permit Appeal - RCRA)
PROTECTION AGENCY,)
Respondent.)

NOTICE OF FILING

Please take notice that on January 14, 2026, Respondent Illinois Environmental Protection Agency filed with the Clerk of the Illinois Pollution Control Board in the above referenced case via the "COOL" System, the attached Index of the Record, Certification of the Record and the Record on Appeal, true and correct copies of which are attached hereto and hereby served upon you.

Respectfully Submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

By KWAME RAOUL, Attorney General of
the State of Illinois

BY: /s/ Christopher J. Grant
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Certificate of Service

I, Christopher J. Grant, a Senior Assistant Attorney General, hereby certify that on this 14th day of January 2026, I caused to be served the foregoing Notice of Filing and Index of Record, Certification of the Record on Appeal and the Record on Appeal, upon the parties named in the attached service list by electronic mail and record will be sent via file transfer link.

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

BFI WASTE SYSTEMS OF NORTH)
AMERICA, LLC)
Petitioner,)
v.) PCB 2024-030
ILLINOIS ENVIRONMENTAL PROTECTION) (Permit Appeal - RCRA)
AGENCY,)
Respondent.)

RECORD ON APPEAL

Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ("Illinois EPA"), in accordance with the procedural rules of the Illinois Pollution Control Board as set forth in 35 Ill. Adm. Code 105.212 and 105.116, files as its Record in this cause the Illinois EPA's record of Final Decision approving with certain conditions modifications to RCRA Hazardous Waste Permit ILD980700728, Log No. B-23R2, issued to BFI Waste System of North America, LLC, Zion Site 1 Phase A on September 25, 2025, which is attached and consists of the following documents:

Volume I of VII:

Date	Description	Record Number
	Volume 1 of 7 Cover Page	R 000001
	Table of Contents	R 000002
9/25/2025	Letter J. Rhoades (IEPA) to Republic Services and GFL Environmental re: RCRA Post-Closure Permit renewal for BFI Zion Site 1 Phase A Landfill	R 000003-000100
	BOL Permit Section RCRA Tracking Sheet for Zion Site 1 Phase I Landfill Log No. B-23R2	R 000101
	K. Huser Review Notes for Zion Site 1 Phase A Landfill RCRA Permit Log No. B-23R2	R 000102-000109

Date	Description	Record Number
9/18/2025	Groundwater Unit Review Draft Response to Comments to BFI Zion Site 1 Phase A Landfill Log No. B-23R2 Hazardous Waste	R 000110-000118
	Public Participation Folder Cover	R 000119
	Public Participation Checklist for RCRA Review Administrative Record Zion Site 1 Phase A Landfill Comment Period July 25, 2025 to September 8, 2025	R 000120
8/12/2025	Public Notice of Hazardous Waste Permit Renewal for Zion Site 1 Phase A Landfill with Purchase Order and Invoice for Publication	R 000121-000128
7/22/2025	Letter: IEPA to Zion Benton Public Library enclosing repository documents for public viewing during comment period re Zion Site 1 Phase A Landfill	R 000129-000130
9/25/2025	Public Participation Mailing List	R 000131-000132
7/25/2025	Publication of Notice on RCRA Permit Renewal for Zion Site 1 Phase A Landfill	R 000133
9/5/2025	Letter Republic Services to IEPA attached to comments on draft RCRA Post-Closure Permit for Zion Site 1 Phase A Landfill	R 000134
9/5/2025	Letter: BFI Waste Systems to IEPA re Comments on Draft RCRA Renewal Post-Closure Permit for Zion Site 1 Phase A Landfill	R 000135-000145
	Draft File Folder	R 000146
	Administrative Record Zion Site 1 Phase A Landfill Draft Permit Decision Table of Contents	R 000147
7/24/2025	Letter: IEPA to Republic Services and GFL Environmental re Draft RCRA Post Closure Renewal Permit for Zion Site 1 Phase A Landfill	R 000148-000230
	BOL Section RCRA Tracking Sheet Zion Site 1 Phase A Landfill Log No. B-23-R2	R 000231
	BOL Section RCRA Tracking Sheet Zion Site 1 Phase A Landfill Log No. B23R2	R 000232
	BOL Section RCRA Tracking Sheet Zion Site 1 Phase A Landfill Log No. B23R2	R 000233
	BOL Section RCRA Tracking Sheet Zion Site 1 Phase A Landfill Log No. B23R2	R 000234
	RCRA Review Folder Cover	R 000235

Date	Description	Record Number
	K. Huser Review Notes RCRA Post Closure Permit Application Zion Site 1 Phase A Landfill	R 000236-000256
	EJ Review Folder Cover	R 000257
6/27/2025	IEPA Letter Zion Site 1 Phase A Landfill RCRA Permit Renewal Environmental Justice Review	R 000258-000261
6/27/2025	Email re EJ Review of Zion Site 1 Phase A Landfill Outreach	R 000262
6/18/2025	Email re EJ Review of Zion Site 1 Phase A Landfill Outreach	R 000263
6/17/2025	Email EJ Review of Zion Site 1 Phase A Landfill Outreach	R 000264-000265
	K. Lesko Technical Review Folder	R 000266-000267
	RCRA Post Closure Application Checklist for Zion Site 1 Phase A	R 000268-000274
	K. Lesko Review Notes RCRA Post-Closure Permit Application Review Zion Site 1 Phase A	R 000275-000315
	Attachment to K. Lesko's Review Notes, Excerpts from September 30, 2011, RCRA Permit Renewal (Log No. B-23R)	R 000316-000329
4/24/2025	Attachment to K. Lesko's Review Notes, Email: T. Halteman to K. Lesko re Zion Renewal Part 620 Groundwater and Leachate Monitoring Programs - Attachment to Review Notes	R 000330-000334
	Completeness Review Cover Sheet	R 000335
6/2021	K. Lesko Review Notes for Completeness RCRA Post Closure Permit Zion Site 1 Landfill	R 000336-000344

Volume II of VII

Date	Description	Record Number
	Volume 2 of 7 Cover Page	R 000345
	Correspondence File Folder Cover	R 000346
6/20/2025	Republic Services Letter to IEPA enclosing Addendum 2 to RCRA Post-Closure Permit Renewal	R 000347-000513
	BOL Permit Section RCRA Tracking Sheet Zion Site 1 Phase A Landfill	R 000514

Date	Description	Record Number
7/2/2021	IEPA Letter to BFI Waste Systems and Advanced Disposal Services re Complete RCRA Part B Post-Closure Permit Renewal for Zion Site 1 Landfill	R 000515
	BOL Permit Section RCRA Tracking Sheet – Application Complete Zion Site 1 Phase B Landfill	R 000516
5/11/2021	Public Notice of Submittal RCRA Part B Post-Closure Permit Renewal Application Zion Site 1 Landfill	R 000517
5/6/2021	Republic Letter to IEPA re Permit Application	R 000518-000539
	Groundwater Review File Folder	R 000540
6/26/2025	Memo: S. Dial to K. Huser re Technical Review of RCRA Part B Permit Renewal Response to Notice of Deficiency	R 000541-000548
7/2/2025	Right to Know Evaluation Zion Site 1 Phase A Landfill reviewed by S. Dial	R 000549
4/23/2025	Memo: S. Dial to K. Lesko re Technical Review of RCRA Part B Permit Renewal Application	R 000550
12/18/23, modified 2/28/2024	Memo: S. Dial to K. Lesko re Technical Review RCRA Part B Permit Renewal Application Modified from December 18, 2023	R 000551-000567
10/31/23- 11/2/2023	Email chain between S. Dial and A. Guido re Zion Permit Renewal	R 000568-000569
2023	Right to Know Evaluation Zion Site 1 Phase A Landfill	R 000570
6/29/2021	Memo: S. Dial to K. Lesko re Completeness Review of RCRA Part B Permit Renewal Application	R 000571-000574
	Corrective Action Review File Folder	R 000575
6/28/2021	Memo: C. Samson to K. Lesko re Completeness Evaluation of Corrective Action Section RCRA Part B Renewal Permit Application Zion Site Phase A	R 000576-000588

Volume III of VII

Date	Description	Record Number
	Volume 3 of 7 Cover Page	R 000589
	Administrative Record Zion Site 1 Phase A Landfill, Volume 2 of 4 Table of Contents	R 000590

Date	Description	Record Number
5/6/2021	Republic Services Letter to IEPA enclosing Zion Site 1 Landfill Permit Renewal Application	R 000591-000592
5/6/2021, Revised 6/2025	RCRA Part B Post Closure Permit Renewal Application for Zion Site 1 Phase A Landfill, Volume I Revised	R 000593-000924

Volume IV of VII

Date	Description	Record Number
	Volume 4 of 7 Cover Page	R 000925
	Administrative Record Zion Site 1 Phase A Landfill, Volume 3 of 4 Table of Contents: Appendix E-3 to E-8	R 000926
5/6/2021	Zion Site 1 Landfill Phase A RCRA Permit Renewal Application, Appendix E-3A to E-3G	R 000927-001526

Volume V of VII

Date	Description	Record Number
	Volume 5 of 7 Cover Page	R 001527
	Administrative Record Zion Site 1 Phase A Landfill, Volume 3 of 4 Table of Contents: Appendix E-3 to E-8 (continued)	R 001528
5/6/2021	Zion Site 1 Landfill Phase A RCRA Permit Renewal Application, Appendix E-4 to E-8	R 001529-002081

Volume VI of VII

Date	Description	Record Number
	Volume 6 of 7 Cover Page	R 002082
	Administrative Record Zion Site 1 Phase A Landfill, Volume 4 of 4 Table of Contents: Appendix E-9 thru E-25	R 002083
5/6/2021	RCRA Part B Post Closure Permit Renewal Application for Zion Site 1 Phase A Landfill, Volume II Cover Page	R 002084
	RCRA Part B Post Closure Permit Renewal Application for Zion Site 1 Phase A Landfill, Appendix E-9 to E-21	R 002085-002762

Volume VII of VII

Date	Description	Record Number
	Volume 7 of 7 Cover Page	R 002763
	Administrative Record Zion Site 1 Phase A Landfill, Volume 4 of 4 Table of Contents: Appendix E-9 to E-25 (continued)	R 002764
5/6/2021	RCRA Part B Post Closure Permit Renewal Application for Zion Site 1 Phase A Landfill, Appendix E-22 to E-25	R 002765-002903
	Outtakes of June 20, 2025 Revisions	R 002904-002913
	Outtakes of June 5, 2025 Revisions	R 002914-003033
	RCRA Part B Post Closure Permit Renewal Application for Zion Site 1 Phase A Landfill, Appendix E-19 Blower Building	R 003034-003036
	RCRA Part B Post Closure Permit Renewal Application for Zion Site 1 Phase A Landfill, Appendix E-15 Contingency Plan	R 003037-003059

Respectfully Submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

By KWAME RAOUL, Attorney General of
the State of Illinois

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OF NORTH AMERICA, LLC,)	
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Petitioner,)	
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v.)	PCB No. 2026-30
)	(Permit Appeal - RCRA)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

CERTIFICATE OF THE RECORD ON APPEAL

I, Kelly Huser, of the Illinois Environmental Protection Agency, hereby certify that the Record on Appeal filed in the above referenced matter and summarized in the attached Index of the Record on Appeal Pursuant to 35 Ill. Admin. Code 105.116 and 105.212 (the "Index"), is true and complete to the best of my knowledge, information, and belief.



Kelly Huser
Environmental Protection Engineer III
Illinois Environmental Protection Agency