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PCB 03-43
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STATE OF ILLINOIS
Pollution Control Board

Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph St., Suite 11-500
Chicago, IL 60601

RE: PCB 03-43- Public Comment

Dear Board Members

Please consider all the evidence presented as it relates to the nine criterion for transfer station siting in your review of our appeal for the above mentioned case. It appeared that some of our County Board members put a lot of weight on recycling and a fear of restricting free trade when it came time to vote on the local siting hearing.

The fact of the matter is Sutter Sanitation was not participating in Effingham County's recycling effort until they petitioned for a transfer station, and then threatened to stop recycling if they were not granted siting for the transfer station. Sutter's current recycling efforts account for LESS THAN TWO TENTHS OF ONE PERCENT. (.00195) of Effingham County's current recycling rate of 28%. That of which Landfill 33's recycling effort has consistently contributed approximately 5.5% annually and has been doing it for 15 years. Additionally, Effingham County has existing buy back centers and drop off sites in town for most of the items Sutter's are collecting at their remote rural location.

While we in no way hold this against the board members, we realize they were voting based on their limited exposure to the economics of solid waste management. The reason for our appeal was to have the evidence reviewed by the panel of experts on the Pollution Control Board who posses an understanding of the economy of scales of Subtitle D landfills.

Please know that Sutter Sanitation is allowed to dump at Landfill 33. Mr. Sutter's apparent lack of knowledge of the Solid Waste Industry beyond collection routes has caused problems that we have attempted to rationally explain to Mr. Sutter with little success. One of which included Mr. Sutter detaining our landfill customers, on our property, for the sake of trying to rally them to boycott our price increases that we implemented to compensate for our transition to Subtitle D pits. (Even though Landfill 33's tipping fees remain below the state average.) This was one of the most comprehensive changes in our industry's recent history and he appeared to have no knowledge of the changes taking place.

The consulting firm that drafted the Effingham County Solid Waste plan testified at this transfer station hearing in opposition to the transfer stations compatibility with the county Solid

Waste Plan. The plan clearly stated "direct shipment of waste to in County or out of County Landfills." The feasibility or need of a transfer station was never seriously considered based on the population and waste volume of Effingham County. Primarily because there is a Subtitle D landfill in Effingham County with long term disposal capacity. Landfill 33 is a small volume landfill in a county with a low volume of waste produced.

Beyond that, please seriously consider the following DESIGN flaws that do not protect public health and safety. This facility was designed as a grain farm, not a solid waste transfer station.

POORLY DESIGNED TRANSFER STATIONS REQUIRE MORE LONG TERM "FIX UP" SOLUTIONS THAN TRANSFER STATIONS THAT WERE PROPERLY DESIGNED FROM THE BEGINNING. If we really need a transfer station in Effingham County (which we do not) it should be designed to be as such.

Sutter's proposed transfer facility has critical design flaws in the following areas:

- Ceiling Height – 16' when it should be 25' minimum. A transfer station would never be designed with a 16' ceiling.

- Staging Area – with one truck on the scales there is no room for another truck to stage and must wait on the road

- Absence of push walls – this is a pole barn which will allow for the accumulation of debris along the walls

- Turning radius – The turning radiuses from the scale and between the building is extremely tight.

- Leachate Control – The flow of leachate has not seriously been tested and the floor was not DESIGNED to control leachate. In Sutter's presentation to the County Board, they claimed leachate would not be present because the operation is indoors. This is purposely misleading because anyone in the hauling business knows that when you open the back of a garbage truck after dumping containers full of rain water there can be up to 200 gallons of water that will pour out on the ground.

- Lack of responsible on site manager.

- There are two (2) residential homes within 1000' of the proposed site, one of which has a built in swimming pool.

Thank you for your attention to this matter. A transfer station is not in the best interest of Effingham County or is it designed to meet the demands of an Environmentally sound facility.

Sincerely,

Landfill 33, Ltd.