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October 16, 2004

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STATE OF ILLINOIS
Pollution Control Board

PC #2

Ms. Dorothy M. Gunn
Clerk of the Board
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

RE: PCB 2004-187
Sutter Sanitation Services, Inc. vs. IEPA
Transfer Station Development
Mason/Effingham County

Ladies and Gentlemen:

I am writing to support the denial of the transfer station permit by the Illinois EPA, which I understand is the subject of the permit appeal the Illinois PCB is reviewing. Specifically, I am writing to support two of the technical denial points of the Illinois EPA.

I have reviewed the Development Permit Application for Proposed Solid Waste Transfer Station, Effingham County Illinois, dated September 29, 2003 and Revised December 12, 2003. The permit application does not include design information for the facilities and structures which would permit State of Illinois to evaluate whether the proposed development will be protective of the environment. The absence of this information is properly the basis for the denial of the permit requested by Sutter Sanitation services by the Illinois EPA. The following information should have been included in the permit application:

- Design details for the concrete slabs in the buildings, including the type and spacing of reinforcing steel;
- Structural design calculations for the concrete slabs to demonstrate the capability to support the anticipated structural loads;
- Design for containment of liquids that penetrate the concrete slab, such as an impermeable liner. The moisture barrier, that is reported to exist, would have been designed for a much different purpose than containment of leachate;
- Design calculations for the collection sump, including: capacity, structure, and foundations;


- Design details and specifications for liquid stops (water stops); these liquid stops are required to prevent the seepage and leakage of liquids at construction joints. Liquid stops should be installed at all joints in the slabs and sump.
- Design for the containment and treatment of stormwater impacted by contact with transport vehicles and tire drag out from the facility buildings; and
- Design details to demonstrate that liquids will be contained on the slab floors and will not run off to the exterior of the building.
- Design to prevent leachate and chemical migration through the concrete; a treatment should be applied to the concrete floor slab to prevent damage to the concrete and migration through the concrete. The adequacy of the treatment product should be evaluated as part of permit application review.
- The permit application did not include details on the management of materials prohibited from landfill disposal, or which require special handling, such as batteries, used tires, landscape waste, PCBs, medical waste, and asbestos containing materials.

Based on the review of the application, it appears that the applicant intends to use existing structures for the development and operation of the transfer station without performing the required design. The concrete slabs may be inadequate for the planned use and could result in releases to the environment. The application acknowledges the presence of shrinkage cracks and that the cracks will be sealed. In the absence of adequate reinforcement, the cracks will continue to expand due to the heavy loads associated with waste transfer. These cracks are significant for the proposed activities at the facility due to potential environmental impacts. Design requirements for the former use as a grain storage facility are much different than for the proposed use for waste transfers and storage.

It is my professional opinion that the permit application submitted by Sutter Sanitation Services was properly denied by the Illinois EPA, based on the inadequacy of the design and the lack of required supporting calculations and management details. For these reasons, I urge you to uphold the decision of the Illinois EPA which denied Sutter's permit.

If you have any questions, please contact the undersigned at 309-693-5777.

Sincerely,



Michael J. Hoffman, P.E.

cc: Joyce L. Munie, P.E., IEPA Bureau of Land, Manager, Permit Section