

To: Clerk of the Board.
Copy to: Ill. Pollution Control Board PCB 08-42

Illinois Environmental Protection Agency
Steven Nightingale/Mark Crites
Douglas Scott

Tom Edwards/River Rescue
902 W. Moss Ave.
Peoria, IL. 61606
Jan. 31, 2008

ORIGINAL

Re: PDC landfill permit:
(3 pages)

RECEIVED
CLERK'S OFFICE

FEB 07 2008

Dear People,

PC# 2

STATE OF ILLINOIS
Pollution Control Board

(Forgive me, but although it was the IEPA's Jan. 1 deadline I was attempting to meet last minute effort after jam packed holidays, I mistakenly directed my request only to the IPCB rather than also to the IEPA. However, its original points are herein repeated.)

* * *

This request is for 1) additional considerations and 2) extension of time for amendments to the IEPA permit for Peoria Disposal Co.'s toxic waste landfill at Peoria.

We note the IEPA deadline did provide for an additional one-month grace period if needed. *Regardless*, the IEPA itself can make administrative additions and corrections.

Enclosed are further considerations for revisions in IEPA's permit to PDC.

Just as global warming has finally reached center stage, disposal of waste, toxic or otherwise, will eventually also be likewise recognized as a vital, crucial problem for the well being of life on our planet.

Given the greater understanding we now have of this matter, how many in the IEPA would now buy a house in the vicinity of a toxic waste landfill? And this landfill?

Toxic wastes from up to 15 states so far are being brought to Peoria for "disposal." *Not outside Peoria, but basically in Peoria!* And over the aquifer from which most of the Peoria area's water supply is drawn. And immediately upwind of the city.

According to the Army Corps of Engineers' map of 16 still operating toxic waste landfills in 13 states of the nation, the one in Peoria is evidently in the most hazardous location to people by far -- a vital matter to the well being of the Peoria area!

This is a situation that can be *virtually eliminated* by the IEPA and USEPA working in harmony with the owner-operator of this landfill, Peoria Disposal Co., and lobbying for the legal tools and financial support to do the job of closing and relocating PDC's landfill as soon as possible. And by means that will be a model for other states.

Moreover, there are 100,000 acres of former stripmine land, now mostly grassland, in the vicinity of Peoria County which could be vastly safer locations for a toxic waste landfill, both geologically and by being well away from population centers.

We have that responsibility to health and welfare -- and in this regard this is one of the most vital issues *ever* for Peorians!



Additional Considerations for IEPA's Permit for Peoria Disposal Co.:

-- Preserve limitations in the original permit:

1 -- From its 1987 beginning PDC's permit was for 2.63 million cubic yards of toxic waste to be put on its hilltop disposal site. That limitation evidently still stands. But both PDC and IEPA are saying that limit has not yet been reached after 20 years of dumping via what was originally a 10-year permit.

That must be impossible. In tonnage, 2.63 million cubic yards of toxic waste, according to an expert, is equivalent to about 900,000 tons, given the loose, even fluffy nature of much or most toxic waste. The waste comes in trucks from up to 15 states.

2 -- The much extended, and also modified permit, was last to expire in 2006. EPA summarily extended it to 2009. We need to focus on closure.

3 -- The disposal area was original permitted for 64 acres. That has been expanded by the EPA to near 75 acres.

4 -- A height limitation is evidently still in effect. But PDC has requested permission to go up another 45 feet (5 stories) higher than the 4 to 5 stories high it already is. That would make it by far the highest hill in that vicinity.

-- Overall, virtually all required data collection and reporting is left by the EPA for PDC to do itself, then send reports to EPA. EPA needs to take more responsibility.

-- Until now collection of test samples from the present 21 monitoring wells has been, nominally, done jointly by PDC with an EPA representative present on a quarterly basis. (There are 25 such well sites listed, but 4 are reported as never installed.)

However, it is PDC that tells EPA on what day to be there for drawing samples. EPA needs to better assure the representiveness of the sample contents.

-- Collection of samples from test wells, formerly done quarterly, are now to be collected semi-annually, and a number only annually. (EPA staffers protested this change.) Leaks could go on for half a year and more without being detected under this arrangement.

-- EPA says an inspector regularly visits the landfill site. But we are told those visits are once, maybe twice, a month, and are only visual. This procedure is not spelled out in the permit. [During city highway-sidewalk construction, inspectors are constantly present.]

-- The EPA had been firm in saying there is no air pollution from the site. **HOWEVER**, EPA was totally unaware that PDC has vents on the site to release gaseous fumes to the air. In an unauthorized visit, I found and smelled acrid emissions from such vents, and reported their location to the EPA. (To his credit, when I told the EPA inspection manager he acknowledged he was unaware of the vents, and asked me where they were.)

EPA has said there is some dust around where the waste hauling trucks unload, that it is largely captured, and that elsewhere on the site any dust pollution is

inconsequential.

BUT new research elsewhere shows gaseous toxic air pollutants from such landfills are very consequential to unborn babies and older people.

-- The EPA has the bulk of the test well samples analyzed by PDC's own laboratory, I have been advised. This seems a rather incestuous arrangement.

-- The federal EPA authorizes 843 toxic chemicals to be put in this landfill (*plus* some PCBs). But checking for only 24 is required just semi-annually, under the revised permit. Yet other hazardous chemicals may well be present as contaminants in these 24!

-- The 843 allowable hazardous chemicals are preponderantly volatile, i.e., will evaporate into the air, we are informed. We need better surveillance and controls.

-- Testing for highly toxic and very volatile mercury has not been included though it is permitted in the landfill. Is this because it quickly volatilizes into the air?

-- The "barrel trench," i.e., toxic waste buried in 1,000s of metal barrels: It is highly unlikely that not one barrel isn't disintegrating from rust, which has or will leave 50,000 tons of toxic waste free in the soil just above the aquifer (as is the rest of the landfill) from which the Peoria area pumps most of its water.

-- All of the 5 barrel trench monitoring wells are listed in EPA's original permit as "upgradient." Doesn't this mean the groundwater is monitored going into the barrel trench rather than *after* it goes through? EPA says it now will require a "downgradient" well also be installed. To test groundwater traveling through the barrel trench into the city's water aquifer? When, and is one enough? Who will do the sampling and testing?

-- EPA says the flow rate of groundwater through the aquifer's porous sand and gravelly soil is only 6 feet per year! It doesn't give the source of that statistic. New and better data seems to be direly needed from independent sources.

The Illinois State Water Survey has pointed out that the "cone of depression" of the water table reaches far from the municipal wells from which it is drawn, and that the fine silt in the water blocks earth pores and prevents recharge of groundwater from the river itself. So great has been the drawdown and lowering of the groundwater table here that the former Hiram Walker distillery in Peoria had to extensively artificially recharge the aquifer by pumping river water into "recharge basins" for its own plant needs. And even very deep excavations, as for the Civic Center, ^{still} find only dry sand.

Under pumpage the underground flow of water is greatly accelerated!

Thank you for your vital attention to this matter,

Tom Edwards/River Rescue

Tom Edwards