

MOHAN, ALEWELT, PRILLAMAN & ADAMI

LAWYERS
SUITE 325

FIRST OF AMERICA CENTER
11 NORTH OLD CAPITOL PLAZA

SPRINGFIELD, ILLINOIS 62701-1323

RECEIVED
CLERK'S OFFICE

SEP - 8 1997

STATE OF ILLINOIS
POLLUTION CONTROL BOARD

EDWARD J. ALEWELT
FRED C. PRILLAMAN
PAUL E. ADAMI
CHERRYL STICKEL NEAL
STEPHEN F. HEDINGER

BECKY S. MCCRAY
PATRICK D. SHAW
JODEL A. BENOIT

*ALSO ADMITTED IN MISSOURI

JAMES T. MOHAN, OF COUNSEL

TELEPHONE
(217) 528-2517
FAX
(217) 528-2553

September 4, 1997

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

Re: In the Matter of: Petition of Waste Professionals, Inc.,
d/b/a Pekin Landfill, for Adjusted Standard, from Ill. Adm.
Code Part 814, Subpart D, AS 97-10

Dear Dorothy:

Kindly file the enclosed Amended Petition for Adjusted Standard in the above-entitled case on behalf of our client, Waste Professionals, Inc.

Thank you.

Very truly yours,

MOHAN, ALEWELT, PRILLAMAN & ADAMI

By

Fred C. Prillaman

FCP/sow
Enclosure

cc: Michelle M. Ryan
Phillip A. Montalvo

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF: PETITION OF)
WASTE PROFESSIONALS, INC.,) AS 97-10
d/b/a PEKIN LANDFILL, for) (Adjusted Standard)
ADJUSTED STANDARD, from Ill. Adm.)
Code Part 814, Subpart D.)

RECEIVED
CLERK'S OFFICE
SEP - 8 1997
STATE OF ILLINOIS
POLLUTION CONTROL BOARD

**NOTICE OF FILING
AND PROOF OF SERVICE**

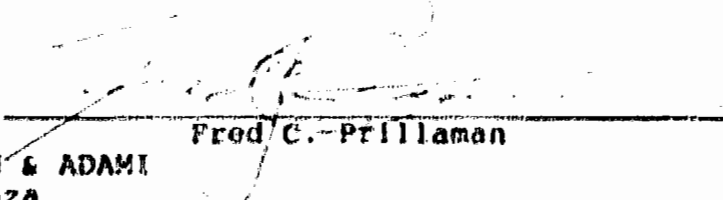
TO: Dorothy Gunn, Clerk
Pollution Control Board
James R. Thompson Center
100 West Randolph Street
Suite 11-500
Chicago, IL 60601

Michelle M. Ryan
Division of Legal Counsel
Illinois Environmental
Protection Agency
1021 North Grand Avenue East
Springfield, IL 62702

Phillip A. Montalvo
Chief Legal Counsel
Illinois Department of Natural Resources
524 S. Second Street
Springfield, IL 62701-1787

PLEASE TAKE NOTICE THAT on 4th day of September, 1997, we sent to the Clerk of the Pollution Control Board the original and nine copies of Waste Professionals' Amended Petition for Adjusted Standard for filing in the above-entitled cause.

The undersigned hereby certifies that a true and correct copy of the above-described pleading was served upon above-identified parties at the above-listed address via first class U.S. Mail, by enclosing same in an envelope, properly addressed, with postage fully prepaid, and by depositing said envelope in a U.S. Post Office mail box on the 4th day of September, 1997.

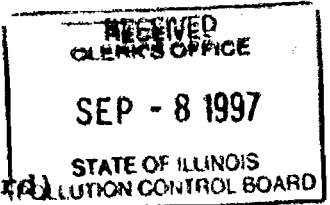

Fred C. Prillaman

MOHAN, ALEWELT, PRILLAMAN & ADAMI
One North Old Capitol Plaza
First of America Center, Suite 325
Springfield, IL 62701-1323
(217) 528-2517

THIS FILING IS SUBMITTED ON RECYCLED PAPER

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF: PETITION OF)
WASTE PROFESSIONALS, INC.,) AS 97-10
d/b/a PEKIN LANDFILL, for) (Adjusted Standard)
ADJUSTED STANDARD, from Ill. Adm.)
Code Part 814, Subpart D.)



AMENDED PETITION FOR ADJUSTED STANDARD

NOW COMES Petitioner, WASTE PROFESSIONALS, INC., d/b/a PEKIN LANDFILL (hereinafter "Waste Professionals"), by its undersigned attorneys, and pursuant to Section 28.1(a) of the Illinois Environmental Protection Act (hereinafter "the Act"), 415 ILCS 5/28.1(a), and Pollution Control Board regulations governing amendments to petitions for adjusted standards appearing at 35 Ill. Adm. Code 106.175, requests that the Board enact an adjusted standard to modify a rule of general applicability which otherwise governs Waste Professionals' landfill in Tazewell County, Illinois. Specifically, Waste Professionals requests adjustment to the standard appearing at 35 Ill. Adm. Code Part 814, Subpart D, to allow a discrete, secure portion of the Pekin Landfill to remain open for a short period of time beyond September 18, 1997 so that the facility can achieve its permitted final elevations and contours.

Since written amendments to the Petition need not repeat the entire unchanged portion of the original filing provided that a sufficient portion of said original filing is repeated so that the context of the amendment is made clear (35 Ill. Adm. Code 106.715), Waste Professionals is repeating herein only those

portions of the original filing necessary to an understanding of the amendatory language contained herein.

INTRODUCTION

The Petition for Adjusted Standard filed by Waste Professionals on June 6, 1997, was met with objection by the Illinois Environmental Protection Agency (hereinafter "the Agency"). Rather than respond to the Agency, Waste Professionals has chosen to meet with the Agency and discuss the major items of concern so that they can be addressed in an amended petition for adjusted standard. This documents attempts to meet those concerns, primarily by committing Waste Professionals to submitting to the Agency, for its review and approval, a contaminant transport model for the Southeast Trench. The results of that model should provide additional assurance that Pekin Landfill, which has already received its significant modification permit, can remain open to waste acceptance in the Southeast Trench only through November 18, 1998, without adversely impacting groundwater.

The additional information in this amended petition clarifies both the proposed adjusted standard and the supporting information previously submitted.

A. Amended Standard to be Addressed

Waste Professionals, for its adjusted standard, proposes a new section be added to Part 814, Subpart D, of this Board's waste disposal regulations, as follows:

Section 814.403 Adjusted Standard

Section 814.403. (a) Notwithstanding Sections 814.401 or 814.402, for a period of up to 14 months after September 18, 1997, Waste Professionals, Inc. d/b/a Pekin Landfill, may continue to accept waste for disposal in the Southeast Trench only of its Tazewell County, Illinois landfill, pursuant to the terms of its existing operating permit, at which time it must commence closure pursuant to the standards set forth in Part 811 of these regulations.

(b) On or before September 30, 1997, Waste Professionals, Inc., d/b/a Pekin Landfill, shall file with the Agency an application to modify its existing operating permit to demonstrate that the concentrations of all the constituents of the leachate at the edge of or outside the zone of attenuation of the Southeast Trench do not exceed the applicable groundwater quality standards of 35 Ill. Adm. Code 811.320, within 32 years of closure of the Southeast Trench, such demonstration to be made using the results of a groundwater contaminant transport (GCT) model for the Southeast Trench, meeting the standards of 35 Ill. Adm. Code 811.317(c).

(c) In the event that the Agency should deny the application for permit referenced in subparagraph (b), Waste Professionals, Inc. shall immediately commence closure pursuant to the standards set forth in Part 811 of these regulations.

(d) After Waste Professionals, Inc. d/b/a Pekin Landfill, initiates closure of its Tazewell County, Illinois landfill, it may accept waste for disposal or for use in closure and post-closure care only as authorized in its closure and post-closure care plans.

1. Explanation of Amendments to Adjusted Standard

New Sections 814.403(b) and (c) have been added to commit Waste Professionals to submitting to the Agency the results of a groundwater contaminant transport model for the Southeast Trench. The model would predict compliance for a period of 32 years after closure, to parallel the post-closure period.

2. Significance of "Sig Mod" Permit to Issue of Groundwater Protection

Attached hereto and made part hereof as Exhibit A is the "significant modification" permit issued by the Illinois EPA to Waste Professionals on October 11, 1996, which, from the standpoint of impact on the environment, is significant in several respects. Waste Professionals, as part of its approved application, identified all water supply wells located within one mile of the facility. The closest public water supply is that for South Pekin located approximately three miles to the west. The groundwater monitoring program is designed to detect changes in groundwater quality before such impacts cross the facility boundary, far in advance of possible contamination of any private or public water supplies.

The subject sig mod permit specifically approves the annual groundwater quality trend report, requires interwell and intrawell trend analyses of groundwater monitoring data, and includes numerous, detailed, special conditions relating to construction quality assurance, operations, acceptance of special waste, recordkeeping, surface water control, leachate management and monitoring, landfill gas management and monitoring and, of course, groundwater monitoring.

Several assessment monitoring programs have been conducted to investigate potential impacts to groundwater. In fact, Pekin Landfill has a corrective action plan, already designed, permitted, and guaranteed by financial assurance, that can be immediately implemented in the event of groundwater

contamination. In addition, any impacts would be identified sooner due to the stricter groundwater standards applicable to Subpart D facilities, since for Subpart D facilities the compliance boundary is the waste boundary, whereas at Subpart C facilities the compliance boundary is the edge of a zone of attenuation 100 feet beyond the waste boundary.

Finally, to further ensure that the use of the Southeast Trench will not adversely impact groundwater, Waste Professionals is required to submit a contaminant transport model for the Southeast Trench, for Agency review and approval.

B. Additional Clarifications of the Proposed Adjusted Standard

1. Clarification of Efforts Necessary to Comply With Regulation of General Applicability

The regulation of general applicability is 35 Ill. Adm. Code Part 814, Subpart D. However, assuming for purposes of discussion that Waste Professionals were a Subpart C facility, thereby making the Subpart C regulations applicable, Waste Professionals has, in its significant modification permit application for a Subpart D facility, already effectively satisfied the location standard appearing at 35 Ill. Adm. Code 811.302(c) concerning the screening of operations from view by a barrier of natural objects, fences, barricades or plants, in those areas where the subject landfill is within 500 feet of the Towerline Road right-of-way. As to the only other Subpart C standard that it could be argued that Waste Professionals has not already satisfied, the hydrogeological site investigation requirements of 35 Ill. Adm. Code 811.315 would require Waste

Professionals to expend approximately \$20,000 to collect additional information to establish background concentrations particularly with respect to downgradient locations. The major cost, thus, would be related to laboratory analyses for a large list of parameters. The remaining Subpart C standard, being the groundwater impact assessment standard at 35 Ill. Adm. Code 811.317, relates to computer modelling of the disposal unit and adjacent area to predict contaminant concentrations over time. This effort can be very complicated given the variety of liner, leachate collection, and cover systems utilized at the subject landfill over the past 25 years of operation.

For this reason, Andrews Engineering estimates that the expense of conducting the modelling would be approximately \$35,000, but further maintains that conducting the modelling and demonstrating compliance with the Subpart C standards would have no effect on either the design or the operation of the disposal unit systems at Pekin Landfill, so that the additional cost necessary to demonstrate such compliance (namely, approximately \$20,000 for the additional testing and approximately \$35,000 for the modelling) would not result in substantially or significantly enhanced effects to the environment or human health. See the affidavit of Greg Kugler, attached hereto and made part hereof as Exhibit B.

Notwithstanding the above, Waste Professionals has committed to submitting to the Agency the results of a computer model to

further demonstrate the environmental integrity of the Southeast Trench.

2. Clarification of Financial Issues

The financial assurance requirements for Pekin Landfill increased from approximately \$540,000 in 1994, when it was acquired by Waste Professionals, to the current amount of approximately \$1,799,000. In addition to more than tripling this fund, Waste Professionals conducts ongoing closure activities on those portions of the landfill achieving final contours, plus post-closure activities on those portions of the landfill that have been certified as closed.

From and after September 18, 1997, Pekin Landfill, under new Section 814.403, will be open for business rather than in a closure/post-closure mode for that part of the fourteen months following September 18, 1997, as will be necessary to fill the Southeast Trench and achieve final contours. Consequently, Pekin Landfill will incur, during that time period, different capital and operating expenses than it would incur if it were in the closure/post-closure mode during that same time period. A table outlining the overall capital, annualized capital, and operating costs under both scenarios is attached as Exhibit B-1 to the affidavit of Greg Kugler.

3. Clarification of Remaining Capacity Issues

The information used in calculations for the Form LPC-PA15 in 1991 and for the remaining capacity reports from 1989 to 1993 was not as accurate as it is under current procedures. No actual

surveying was performed in 1991 to substantiate calculation assumptions. That procedure was first implemented to prepare the 1994 report, but even then, the remaining volume was based on a comparison to permitted final contours, which exceeded the existing ground elevations by as much as 30' at the waste boundary (beyond which no waste could be placed). Also, for its 1995 report, Pekin Landfill was instructed by the Agency to simply subtract the waste accepted during the reporting period from the 1994 reported remaining capacity (Note: this was a transition report from an April-March reporting period to a calendar year reporting period).

Surveying was conducted for the 1996 report and, combined with adjustments made for permitted volume that could not be utilized, resulted in a remaining waste capacity of 332,933 cubic yards (gate). This corresponded to 19 months remaining life, i.e., an expected closure date of August 1, 1997. September 17, 1997 was still reported as the expected closure date to allow for minor changes in waste acceptance rates.

Surveying conducted for the 1997 report resulted in a remaining waste capacity of 273,270 cubic yards (gate). This higher than anticipated volume could only be attributed to improved waste and cover compaction, extensive use of alternate daily cover materials, and settlement of previously placed waste. In addition, gate receipts had dropped from approximately 690 yd³/day in 1995 to 479 yd³/day in 1996.

**4. Clarification of the Intent of Proposed New Section
814.403(d)**

Finally, the Petition filed by Waste Professionals does not seek an adjusted standard that itself would authorize Pekin Landfill, by the very terms of the adjusted standard, to accept waste during its closure and post-closure care periods. Instead, the proposed adjusted standard labeled new Section 814.403(d) would only authorize Pekin Landfill to do so if, and only if, authorized in the permit issued by Illinois EPA. It is not believed that this additional permit amendment will be needed, but if it is, new Section 814.403(d) would give the Agency the authority to allow such waste acceptance, identical to the authority the Agency possessed relative to Subpart E facilities in 1992, pursuant to 35 Ill. Adm. Code 807.509. As such, the proposed new Section 814.403(d) is simply a backup to the main proposal at Section 814.403(a), which, if enacted, would give Waste Professionals the opportunity to demonstrate to the Agency that additional time, beyond November 18, 1998, may be necessary to properly close out the Southeast Trench.

CONCLUSION

WHEREFORE, for the reasons set forth above and in the Petition for Adjusted Standard filed on July 6, 1997, Waste Professionals respectfully requests that the Board enact the adjusted standard requested herein.

Respectfully submitted,

WASTE PROFESSIONALS, INC., d/b/a PEKIN
LANDFILL, Petitioner,

By MOHAN, ALEWELT, PRILLAMAN & ADAMI,
Its Attorneys,

By Becky S. McCray
Becky S. McCray

By Fred C. Prillaman
Fred C. Prillaman

MOHAN, ALEWELT, PRILLAMAN & ADAMI
One North Old Capitol Plaza
First of America Center, Suite 325
Springfield, IL 62701-1323
(217) 528-2517

C:\NAFA\WASTEPROF\LANTRDPET.CLN PCP/saw 09/04/97



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Permit file

Mary A. Gade, Director
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

October 11, 1996

CERTIFIED MAIL
Z 363 620 828
Z 363 620 829

OPERATOR

Waste Professionals, Inc.
Attn: Mr. Ron Boerema
11916 Towerline Road
Pekin, Illinois 61554

OWNER

Eloyd and Frances Simpson
11916 Towerline Road
Pekin, Illinois 61554

Re: 1798050001 -- Tazewell County
Pekin Landfill
Permit No. 1994-449-LFM
Modification No. 1
Log No. 1996-214
Expiration Date: April 15, 2001
Permit File

Dear Mr. Boerema and Mr. and Mrs. Simpson:

Permit is hereby granted to Eloyd and Frances Simpson, as owner, and Waste Professionals, Inc., d/b/a Pekin Landfill, as operator, approving modification of an existing municipal and non-hazardous special waste landfill all in accordance with the application and plans prepared by Bryan C. Johnrud, P.E. of Andrews Environmental Engineering, Inc. Final plans, specifications, application, and supporting documents, as submitted and approved, shall constitute part of this permit and are identified in the records of the Illinois Environmental Protection Agency (the "Agency"), Bureau of Land, Division of Land Pollution Control by the permit number and log number designated in the heading above.

The application approved by Modification No. 1 consists of the following documents:

<u>DOCUMENT</u>	<u>DATED</u>	<u>DATE RECEIVED</u>
Original Application Log No. 1996-214	July 15, 1996	July 15, 1996

Specifically, Modification No. 1:

- a. Adds new Condition 11.9.h regarding the prohibition of liquid waste oil in accordance with Section 21.6 of the Illinois Environmental Protection Act (an Agency-initiated modification).

Exhibit A

- b. Approves the annual groundwater quality trend report required by Condition VIII.18;
- c. Requires a new groundwater monitoring well (G01A) and analysis;
- d. Requires interwell and intrawell trend analyses of groundwater monitoring data;
- e. Approves the revised cost estimate for closure and post-closure care of \$1,798,590;
- f. Acknowledges receipt of the plan sheet required by Condition XI.1 of Permit No. 1994-449-LFM, issued April 15, 1996.
- g. The maximum final elevation for this facility shall be approximately 655 feet above mean sea level. This is not an increase in final fill height, but an Agency correction to the elevation.
- h. Operation (i.e., waste disposal) within the permitted boundaries of the existing landfill unit until September 18, 1997. This is not a change, but a correction of the date from the April 15, 1996 document.)

Except for the differences described below, the special conditions of the permit letter for Modification No. 1 to Permit No. 1994-449-LFM are identical to the special conditions of Permit 1994-449-LFM issued April 15, 1996.

Condition Number in Permit 1994-449-LFM	Condition Number in Modification No. 1	Description of Modification
N/A	II.9.h	Added liquid waste oil disposal ban.
II.9.h	II.9.i	Renumbered.
VIII.10	VIII.10	Added new well.
VIII.18	VIII.18	Revised wording.
N/A	VIII.19	New condition.
X.5	X.5	Revised wording.
X.6	X.6	Revised cost estimate.
XI.1	N/A	Omitted XI.1 and renumbered subsequent conditions.

Pursuant to Section 39(a) of Illinois Environmental Protection Act (Act) and 35 IAC. 813.104(b), this permit is issued subject to the development, operating and reporting requirements for non-hazardous waste landfills in 35 IAC. Parts 810, 811, 812, 813 and 814, the standard conditions attached hereto, and the following special conditions. In case of conflict between the

permit application and these conditions (both standard and special), the conditions of this permit shall govern.

I. CONSTRUCTION QUALITY ASSURANCE

1. All necessary surface drainage control facilities shall be constructed prior to other disturbance in any area.
2. No part of the unit shall be placed into service or accept waste until an acceptance report for all the activities listed below has been submitted to and approved by this Agency as a significant modification pursuant to 35 IAC, Sections 811.505(d) and 813.203.
 - a. Installation of the leachate drainage and collection systems;
 - b. Construction of ponds, ditches, lagoons and berms.
3. The permittee shall designate an independent third party contractor as the Construction Quality Assurance (CQA) Officer(s). The CQA Officer(s) shall be an Illinois Certified Professional Engineer who is independent from and not under the control or influence of the operator, any employee of the operator, or any other corporation, company or legal entity that is a subsidiary, affiliate, parent corporation or holding corporation associated with the operator.
4. The CQA Officer(s) designated pursuant to Condition I.3. shall personally be present during all construction and testing that is subject to CQA certification pursuant to 35 IAC, Section 811.503(a). If the CQA Officer(s) is unable to be present as required, then a written explanation and signed statement must be provided for each absence pursuant to 35 IAC, Section 811.503(b).
5. The clay liner and earthen low permeability layer of the final cover system shall be tested for density and moisture content a minimum of one test each per 1,000 yds³ soil placed.
6. A minimum of one laboratory permeability test shall be performed for every 10,000 cubic yards of liner soil placed.
7. If the clay portion of the liner or earthen low permeability layer of the final cover system is exposed to freezing conditions, it must be recertified. The designated CQA Officer(s) shall then certify that the clay portion of the liner and all necessary repairs to the leachate drainage layer meet the required design standards. This certification must be provided to the IEPA prior to disposal of waste on the subject portion of the liner. If operating authorization has not yet been issued for that area, the recertification shall be

included in the application for Significant Modification of Permit to obtain Operating Authorization for that area.

8. Pursuant to 35 IAC, Section 811.505(d), upon completion of construction of each major phase, the CQA Officer(s) shall submit an acceptance report to the Agency. The acceptance report shall be submitted before the structure is placed into service and shall contain the following:
 - a. A certification by the CQA Officer(s) that the construction has been prepared and constructed in accordance with the engineering design;
 - b. As-built drawings; and
 - c. All daily summary reports.
9. All stakes and monuments marking property boundaries and the permit area shall be maintained, inspected annually and surveyed no less frequently than once in five years by a professional land surveyor.
10. All standards for testing the characteristics and performance of materials, products, systems and services shall be those established by the American Society for Testing and Materials (ASTM) unless otherwise stated in the permit application.

II. OPERATING CONDITIONS

1. Pursuant to 35 IAC, Sections 811.107(a) and 811.107(b), throughout the operating life of this landfill, waste shall not be placed in a manner or at a rate which results in unstable internal or external slopes or interference with construction, operation or monitoring activities.
2. The operator of this solid waste facility shall not conduct the operation in a manner which results in any of the following:
 - a. refuse in standing or flowing waters;
 - b. leachate flows entering waters of the State;
 - c. leachate flows exiting the landfill confines (i.e., the facility boundaries established for the landfill in a permit or permits issued by the Agency);
 - d. open burning of refuse in violation of Section 9 of the Illinois Environmental Protection Act (Act);

- e. uncovered refuse remaining from any previous operating day or at the conclusion of any operating day, unless authorized by permit;
 - f. failure to provide final cover within time limits established by Board regulations;
 - g. acceptance of wastes without necessary permits;
 - h. scavenging as defined by Board regulations;
 - i. deposition of refuse in any unpermitted (i.e., without an Agency approved significant modification authorizing operation) portion of the landfill;
 - j. acceptance of a special waste without a required manifest and identification record;
 - k. failure to submit reports required by permits or Board regulations;
 - l. failure to collect and contain litter from the site by the end of each operating day.
3. Moveable, temporary fencing shall be used to prevent blowing litter when the refuse is above the natural ground line.
4. At the end of each day of operation all exposed waste shall be covered with:
- a. Clean soil at least six (6) inches thick (i.e., conventional daily cover); or
 - b. An alternate cover as described below.
5. Geotextile fabric, dried sewage sludge, shredded tires, clean construction demolition debris are approved as alternate material for daily cover pursuant to 35 IAC, Sections 811.106(b) and 812.111(b). Use of alternate materials as daily cover shall be subject to the following conditions:
- a. If any alternate materials other than those approved by this permit are to be used, their use must be approved by this Agency through the permit process.
 - b. At any one time, the total area, where alternate materials are used as daily cover shall be no more than 5000 square yards. Beyond this maximum, daily cover soil shall be used on all areas where waste has been disposed and to which intermediate or final cover has not been applied.
 - c. Areas upon which alternate cover has been used must be covered with either conventional cover or additional waste within six days.

- d. **Conventional daily cover in accordance with 35 IAC 811.106(a) shall be used if weather or other conditions adversely affect the ability of the alternate cover materials to prevent problems with blowing litter, fire, odors, or vectors.**
- e. **Geotextile fabric shall be anchored adequately to prevent wind damage. If the alternate daily cover is torn during or after placement they must be repaired immediately or the damaged area must be covered with six inches of daily cover soil. If tires are used as weights for the alternate daily cover, they shall be converted tires, in accordance with 35 IAC, Part 848: Management of Used and Waste Tires.**
- f. **Sludge alternate daily cover shall not be used for areas that will drain away from the landfill to surface water, but shall be used only in areas that will drain back into the fill area or to the leachate drainage system.**
- g. **Odors emanating from the use of dried sludge as alternate daily cover shall not leave the facility. If odor leaves the facility, immediately cover the dried sludge with additional waste or another approved daily cover.**
- h. **Any dried sludge received when conditions are not suitable for use as alternate daily cover shall be disposed at the active face. Dried sludge shall not be stockpiled at the facility but shall be placed in the active area for the date received.**
- i. **Only the dried sewage sludge described in the application Log 1995-449 may be used as alternate daily cover in accordance with this permit.**
- j. **Shredded tires to be used as alternate daily cover shall be altered tires, in accordance with 35 Ill. Adm. Code, Part 358. Shredded tires may be accumulated in an area approximately 50 feet from the active face during any day the landfill is operating. The shredded tires shall be used as alternate daily cover that day. No shredded tires shall be stored overnight.**
- k. **Clean construction-demolition debris, as defined in the Illinois Environmental Protection Act, may be accumulated in an area approximately 50 feet from the active face during any day the landfill is operating. The clean construction-demolition debris shall be used as alternate daily cover that day. No clean construction-demolition debris shall be stored overnight.**
- l. **When an alternate cover is applied, the operator shall keep a record including a description of the weather conditions, the type of alternate cover used and its performance. A summary of this information shall be provided with this facility's annual reports.**

- m. Any alternate daily cover which has been used for daily cover may not be reused for any purpose (including road underlayment and erosion control) outside of permitted disposal boundaries.
6. No later than 60 days after placement of the final lift of waste in any area, the area shall receive a final cover system meeting the design specifications approved in this permit application. The low permeability layer shall consist of a three-foot layer of soil with a maximum permeability of 1×10^{-7} cm/sec. For the two lateral expansion areas, 0.9 and 1.9 acres, the low permeability layer shall also include a geomembrane, HDPE or VLDPE, placed over the low permeability soil layer. The final protective layer shall consist of, at a minimum, three feet of uncompacted soil. The top six inches of the protective soil must be capable of supporting vegetation. The total thickness of the final protective layer shall not be less than three feet. The Agency acknowledges approximately 14 acres of final cover placed and certified in accordance with 35 IAC, Part 807 and 814.401(a)(4).
7. All waste not covered within sixty days of placement with additional waste or final cover shall have an intermediate cover of compacted clean soil with a minimum thickness of one foot applied to it.
8. The operator shall implement a load checking program that meets the requirements of 35 IAC, Section 811.323. If regulated hazardous waste or other unauthorized wastes are discovered, the Agency shall be notified no later than 5:00 p.m. the next business day after the day it is detected. The load checker shall prepare a report describing the results of each inspection. A summary of these reports shall be submitted to the Agency as part of this facility's annual report.
9. Management of Unauthorized Waste
 - a. Landscape waste found to be mixed with municipal waste will be removed the same day and transported to a facility that is operating in accordance with the Act, Title V, Sections 21.
 - b. Lead-acid batteries will be removed the same day and transported either to a drop-off center handling such waste, or to a lead-acid battery retailer.
 - c. Potentially infectious medical waste (PIMW) found to be mixed with municipal waste shall be managed in accordance with 35 Ill. Adm. Code, Subtitle M.
 - d. Tires found to be mixed with municipal waste shall be removed and managed in accordance with Section 55 of the Act.

- e. White good components mixed with municipal waste shall be removed and managed in accordance with Section 22.28 of the Act.
 - f. This facility is prohibited from disposing any waste containing polychlorinated bi-phenyls (PCBs) in concentration greater than 50 ppm, pursuant to the Toxic Substance Control Act (TSCA).
 - g. No liquid waste (special or non-special) as determined by the Paint Filter Test shall be disposed unless the waste is from a household or is in a small container similar in size to that normally found in household waste and the container was designed for use other than storage. The prohibition applies to on-site generated wastes except for leachate or gas condensate that is specifically approved for recirculation into the landfill by permit. However, minor amounts of liquid resulting from precipitation (rain, sleet, hail or snow) during transport and disposal operations shall not be construed as a violation of this condition.
 - h. The operator shall not accept liquid used oil for final disposal that is discernable in the course of prudent business operation. "Liquid used oil" shall not include used oil filters, rags, absorbent material used to collect spilled oil or other materials incidentally contaminated with used oil, or empty containers which previously contained virgin oil, re-refined oil, or used oil.
 - i. After the unauthorized waste has been removed, a thorough cleanup of the affected area will be made according to the type of unauthorized waste managed. Records shall be kept for three years and will be made available to the Agency.
10. Operating hours are those hours during which waste may be accepted. For this facility, the operating hours shall be limited to 6:00 a.m. to 6:00 p.m., Monday through Friday, 6:00 a.m. to noon on Saturday. Adequate lighting shall be provided for outdoor activities at the landfill occurring before sunrise or after sunset.
11. If it is required for the facility to be open beyond normal operating hours to respond to emergency situations, a written record of the date(s), times and reason the facility was open shall be made part of the operating record for the facility. The IEPA-FOS Regional Office, and when applicable, the county authority responsible for inspections of this facility per a delegation agreement with the Agency shall be notified no later than 5:00 p.m. the next business day following the acceptance of waste outside the specified operating hours.
12. Asbestos debris from construction-demolition shall be managed in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAPS) regulations.

13. **Road building materials including clean construction-demolition debris may be stockpiled on-site in the amount estimated to be needed within the next construction season provided they are managed in accordance with 35 IAC, Section 811.108(c)(1). These materials may be used for construction of roadways at the facility.**
14. **Equipment shall be maintained and available for use at the facility during all hours of operation to allow proper operation of the landfill. If breakdowns occur that would prevent proper facility operation, back-up equipment shall be brought into the site.**
15. **All utilities, including but not limited to heat, lights, power, communications equipment and sanitary facilities necessary for safe, efficient and proper operation of the landfill shall be available at the facility at all times.**
16. **Waste shall be deposited at the fill face and compacted upward into the fill face unless precluded by extreme weather conditions or for reasons of safety.**
17. **The operator shall implement methods for controlling dust so as to prevent wind dispersal of particulate matter off-site**
18. **The facility shall be constructed and operated to minimize the level of equipment noise audible outside the facility. The facility shall not cause or contribute to a violation of 35 IAC, Parts 900 through 905.**
19. **The operator shall implement measures to control the population of disease and nuisance vectors.**
20. **The operator shall institute fire protection measures in accordance with the proposed fire safety plan.**
21. **The operator shall implement methods to prevent tracking of mud by hauling vehicles onto public roadways.**
22. **Access to the active area and all other areas within the boundaries of the facility shall be controlled by use of fences, gates and natural barriers to prevent unauthorized entry at all times.**
23. **A permanent sign shall be maintained at the facility entrance containing the information required under 35 IAC, Section 811.109(b)(1) through (5).**

III. ACCEPTANCE OF SPECIAL WASTE

1. The permittee is authorized to accept non-hazardous special waste that meets the definition of industrial process waste or pollution control waste as found in Section 3.17 and 3.27, respectively, of the Illinois Environmental Protection Act, in accordance with the following requirements:
 - a. The waste is analyzed in accordance with the requirements described below and complies with the acceptance criteria in the approved waste analysis plan;
 - b. The waste is delivered by an Illinois licensed special waste hauler or an exempt hauler as defined in 35 IAC, Section 809.211; and
 - c. The waste is accompanied by a manifest, if required.
2. The permittee shall obtain the annual Generator and Certification form (enclosed), which certifies the waste has not changed since the last analysis, must be completed and included in the operating record. A complete laboratory analysis must be provided with the exceptions listed below.

Analysis shall be conducted using SW-846 test methods. The waste shall be reanalyzed at least every five years and must identify the actual concentration of each chemical constituent and state of each physical parameter. In all cases a copy of the lab analysis (on lab letterhead and signed by a responsible party such as the person conducting the analysis or his/her supervisor) must be included in the operating record with the Special Waste Preacceptance format (Profile Identification Sheet). The analysis may not be greater than one year old at the time. A new analysis is required if the composition of the waste changes (normal variations in waste composition are expected and are not included in this requirement). All waste must be analyzed as follows:

- a. The permittee shall obtain the following lab analyses to determine the concentrations of the following parameters.

Paint Filter Test
Flash point
Sulfide (reactive)
Cyanide (reactive)
Phenol (total)
pH
Toxicity Characteristic Constituents

b. The permittee shall obtain analysis for reactive sulfides and cyanides. For waste containing 250 ppm or greater reactive cyanide or 500 ppm or greater reactive sulfide it is presumed hazardous pursuant to 35 IAC, Section 721.123(a)(5) unless specific information to show it does not present danger to human health or the environment is provided. Analysis for total sulfide and/or cyanide may be substituted for reactive concentrations if they are equal to or less than 10 ppm. For wastes containing greater than 10 ppm reactive cyanide or reactive sulfide, the permittee shall not accept the waste unless the generator provides a signed and dated statement indicating that none of the following have occurred:

- i. The waste has never caused injury to a worker because of H₂S and/or HCN generation;
- ii. That the OSHA work place air concentration limits for H₂S and/or HCN have not been exceeded in areas where the waste is generated, stored or otherwise handled; or
- iii. That air concentrations of H₂S and/or HCN, above 10 ppm, have not been encountered in areas where the waste is generated, stored or otherwise handled.

c. The permittee shall obtain analysis for phenols. If the total phenol concentration is greater than 1000 ppm, the waste will be required to be drummed and labeled, unless justification that this precaution is not necessary is provided. The justification must demonstrate skin contact is unlikely during transport or disposal.

d. The permittee shall obtain metals and organics analysis. Either procedure may be utilized (i.e., total or TCLP), but any constituent whose total concentration exceeds the TCLP limit specified in 35 IAC, Section 721.124 must be analyzed using the TCLP test and the results reported, unless an alternative test has been approved by the Agency. TCLP test methods must be in accordance with SW 846-1311.

e. EXCEPTIONS:

- i. The generator may certify that the eight pesticides (D012, D013, D014, D015, D016, D017, D020 and D031) would not reasonably be expected to be present in their waste based on the nature of the generator's business.
- ii. Petroleum contaminated media and debris from LUST sites subject to corrective action regulation under 35 IAC, Part 731 are temporarily exempt from complete TCLP analysis and the generator may limit analysis to flashpoint, paint filter test and TCLP lead.

- iii. **For off-specification, unused or discarded commercial or chemical products, an MSDS to determine the hazardous constituents present may be provided in lieu of analytical results.**

- f. **Pursuant to 35 Ill. Adm. Code 722.111 the generator of a solid waste is required to determine if the waste is hazardous and comply with all applicable hazardous waste regulations. For any waste that has been determined to be hazardous, the results of quality assurance testing for the treatment program, taken at an appropriate frequency to demonstrate the waste is no longer hazardous, must be obtained. Verification that the waste meets the land disposal restrictions must also be documented. These requirements are in addition to the other standard special waste test requirements.**

- 3. **An individual waste stream permit is no longer required by this Agency for this facility. Therefore, a waste stream permit number will no longer be required on the manifest when shipping waste to this facility as authorized by this permit.**

- 4. **The permittee shall conduct the following analysis for waste received in labeled containers in lab packs including commingled wastes are subject to the following requirements:**
 - i. **Compatibility review in accordance with the procedures identified in USEPA document EPA-600/2-80-076**

 - ii. **MSDS review to determine the hazardous constituents present and appropriate USEPA hazardous waste class.**

- 5. **RCRA empty containers received as a special waste are subject to conditions which state:**
 - a. **Containers have a rated capacity of less than 110 gallons only.**

 - b. **Containers which formerly held P listed hazardous waste or TSCA regulated quantities of PCBs or empty compressed gas cylinders are not included under this permit.**

 - c. **All containers must meet the definition of empty as described in 35 Ill. Adm. Code, Section 721.107(b).**

 - d. **Additionally, where possible, a copy of the material safety data sheets for products last contained will be obtained and kept on file.**

- e. For drums, at least one end must be removed and the drums must be crushed flat.
6. The Annual Generator Recertification for Disposal Special Waste format shall be utilized for the special waste recertification requirements of 35 IAC, Section 811.404(b).
7. The operator shall retain all special waste records until the end of the post-closure care period in accordance with 35 IAC 811.405.

IV. RECORDKEEPING

1. Information developed by the operator but not yet forwarded to the Agency in a quarterly or annual report shall be kept at or near the facility for inspection by the Agency upon request during normal working hours.
2. Information and observations derived from load checking inspections shall be recorded in writing and retained at the facility for at least three years.
3. Every person who delivers special waste to a special waste hauler, every person who accepts special waste from a special waste hauler and every special waste hauler shall retain a copy of the special waste transportation record as a record of each special waste transaction. These copies shall be retained for three years and shall be made available at reasonable times for inspection and photocopying by the Agency pursuant to Section 4(d) of the Act.
4. The operator shall retain copies of any special waste profile identification sheets, special waste recertifications, certifications of representative samples, special waste laboratory analyses, special waste analysis plans, and any waivers of requirements, at the facility until the end of the closure period and thereafter at the site office until the end of the post-closure care period.
5. Inspections of the closed landfill shall be conducted in accordance with the approved post-closure care plan. Records of field investigations, inspections, sampling and corrective action taken are to be maintained at the site and made available to IEPA personnel. During the post-closure care period, those records are to be maintained at the office of the site operator.
6. The owner or operator shall record and retain near the facility in an operating record or in some alternative location specified by the Agency, the information submitted to the Agency pursuant to 35 IAC, Parts 812 and 813, as it becomes available. At a minimum, the operating record shall contain the following information, even if such information is not required by 35 IAC, Part 812 or 813:

- a. Any location restriction demonstration required by 35 IAC, Sections 811.302, 812.109, and 812.303 and 812.305;
- b. Inspection records, training procedures, and notification procedures required by 35 IAC, Section 811.323;
- c. Gas monitoring results and any remediation plans required by 35 IAC, Sections 811.310 and 811.311;
- d. Any MSWLF unit design documentation for placement of leachate or gas condensate in a MSWLF unit required by 35 IAC, Section 811.107(m);
- e. Any demonstration, certification, monitoring results, testing, or analytical data relating to the groundwater monitoring program required by 35 IAC, Sections 811.319, 811.324, 811.325, 811.326, 812.317, 813.501 and 813.502;
- f. Closure and post-closure care plans and any monitoring, testing, or analytical data required by 35 IAC, Sections 811.110, 811.111, 812.114(h), 812.115 and 812.313; and
- g. Any cost estimates and financial assurance documentation required by 35 IAC Part 811, Subpart G.

V. GENERAL CONDITIONS

- 1. This permit is issued with the expressed understanding that no process discharge to Waters of the State or to a sanitary sewer will occur from these facilities except as authorized by a permit issued by the Bureau of Water Pollution Control.
- 2. Site surface drainage, during development, during operation and after the site is closed, shall be managed in accordance with the approved drainage control plan.
- 3. If changes occur which modify any of the information the permittee has used in obtaining a permit for this facility, the permittee shall notify the Agency. Such changes would include but not be limited to any changes in the names or addresses of both beneficial and legal titleholders to the herein-permitted site. The notification shall be submitted to the Agency within fifteen days of the change and shall include the name or names of any parties in interest and the address of their place of abode; or, if a corporation, the name and address of its registered agent.
- 4. Pursuant to 35 IAC, Section 813.201(n), any modifications to this permit shall be proposed in the form of a permit application and submitted to the Agency.

5. Pursuant to 35 IAC, Section 813.301, an application for permit renewal shall be filed with the Agency at least ninety days prior to the expiration date of this permit.

VI. SURFACE WATER CONTROL

1. Runoff from disturbed areas to Waters of the State shall be permitted by the Agency in accordance with 35 IAC, Part 309, and meet the requirements of 35 IAC 304 unless permitted otherwise.
2. All surface water control structures other than temporary diversions for intermediate phases shall be operated until the final cover is placed and erosional stability is provided by the final protective layer of the final cover system.
3. Runoff from undisturbed areas resulting from precipitation events less than or equal to the 25-year, 24-hour precipitation event shall be diverted around disturbed areas where possible and not commingled with runoff from disturbed areas.
4. Site surface drainage, during development, during operation and after the site is closed, shall be managed in accordance with the approved drainage control plan detailed in Application Log No. 1994-449. Stormwater management structures consisting of perimeter ditches and sediment basins shall be constructed within 12 months of the date of this permit or prior to disturbing any portion of a drainage area identified in Application Log No. 1994-449.

VII. LEACHATE MANAGEMENT/MONITORING

1. Pursuant to 35 IAC, Section 811.309(h)(1), leachate from this landfill shall be collected and disposed beginning as soon as it is first produced and continuing for at least 30 years after closure of the disposal unit. Collection and disposal of leachate generated from any sub-system may cease only when the conditions described in 35 IAC, Section 811.309(h)(2) have been achieved. Leachate removed from this landfill shall be treated at an IEPA permitted facility in accordance with the leachate management plan proposed in Application Log No. 1994-449.
2. Pursuant to 35 IAC, Sections 811.307(a) and (b), 811.308(a) and (h), and 811.309(a), for the two lateral expansion areas leachate shall be pumped from the side slope riser sump(s) before the level of leachate rises above the invert of the collection pipe(s) at its lowest point(s). Leachate removal as such shall be performed throughout the period that the leachate collection/management system must be operated in accordance with Permit Application Log No. 1994-449.

3. In the event that the leachate monitoring program detects a constituent in the leachate that is not already in the parameter lists for the groundwater monitoring program, the operator shall, within 90 days of such detection, submit to the Agency a permit application which either:
 - a. Proposes to add the constituent to the groundwater monitoring program; or
 - b. Demonstrates why adding the constituent to the groundwater monitoring program is not necessary or appropriate.
4. The following monitoring points are to be used in the Leachate Monitoring Program for this facility:

Leachate Monitoring Points

<u>Applicant Designation</u>	<u>Agency Designation</u>
N/L310	L310
SE/L311	L311
SW/L312	L312

5. Pursuant to 35 IAC, Sections 811.309(g), 811.319(a)(1)(C)(ii), 810.103, 722.111 and 721. Subpart C, leachate monitoring (i.e., sampling, measurements and analysis) must be implemented at each leachate monitoring point when that device accumulates a measurable quantity of leachate for the first time. The concentrations or values for the parameters contained in List L1 (below) shall be determined on a quarterly basis for each "producing" monitoring point and submitted with the quarterly groundwater reports.

The concentrations for the parameters contained in List L2 (also below) shall be determined annually. Condition VII.6. presents the sampling, testing and reporting schedules in tabular form. Leachate monitoring at each monitoring point shall continue as long as groundwater monitoring at this landfill is necessary pursuant to 35 IAC, Section 811.319(a)(1)(C).

LIST L1

<u>Routine Leachate Monitoring Parameters</u>	<u>STORET</u>
Temp. of Leachate Sample (°F)	00011
Specific Conductance	00094
pH	00400

LIST L1 (cont.)

<u>Routine Leachate Monitoring Parameters</u>	<u>STORET</u>
Elevation Leachate Surface	71993
BTM of Well Elevation	72020
Leachate Level from Measuring Point ft.	72109
Arsenic (total)	01002
Barium (total)	01007
Cadmium (total)	01027
Chromium (hexavalent)	01032
Chromium (total)	01034
Copper (total)	01042
Cyanide	00720
Fluoride	00951
Iron (total)	01045
Lead (total)	01051
Manganese (total)	01055
Nickel (total)	01067
Oils (hexane soluble or equivalent)	00550
Phenols	32730
Silver (total)	01077
Zinc (total)	01092
Total Dissolved Solids	70300
Total Suspended Solids	00530
Ammonia Nitrogen - N	00610
Bacteria (Fecal Coliform)	31616
Biochemical Oxygen Demand(BOD ₅)	00310
Mercury (total)	71900
Phosphorous	00665
Chemical Oxygen Demand (COD)	00335

LIST L2

<u>Annual Leachate Monitoring Parameters</u>	<u>STORET</u>
Temp. of Leachate Sample (°F)	00011
Specific Conductance	00094
pH	00400
Elevation Leachate Surface	71993
BTM of Well Elevation	72020

LIST L2 (cont.)

<u>Annual Leachate Monitoring Parameters</u>	<u>STORET</u>
Leachate Level from Measuring Point ft.	72109
1,1,1,2-Tetrachloroethane	77562
1,1,1-Trichloroethane	34506
1,1,2,2-Tetrachloroethane	34516
1,1,2-Trichloroethane	34511
1,1-Dichloroethane	34496
1,1-Dichloroethylene	34501
1,1-Dichloropropene	77168
1,2,3-Trichlorobenzene	77613
1,2,3-Trichloropropane	77443
1,2,4-Trichlorobenzene	34551
1,2,4-Trimethylbenzene	77222
1,2-Dibromo-3-Chloropropane	38760
1,2-Dichloroethane	34531
1,2-Dichloropropane	34541
1,3,5-Trimethylbenzene	77226
1,3-Dichloropropane	77173
1,3-Dichloropropene	34561
1,4-Dichloro-2-Butene	73547
1-Propanol	77018
2,2-Dichloropropane	77170
2,4,5-tp (Silvex)	39760
2,4,6-Trichlorophenol	34621
2,4-Dichlorophenol	34601
2,4-Dichlorophenoxyacetic Acid (2,4-D)	39730
2,4-Dimethylphenol	34606
2,4-Dinitrotoluene	34611
2,4-Dinitrophenol	34616
2,6-Dinitrotoluene	34626
2-Chloroethyl Vinyl Ether	34576
2-Chloronaphthalene	34581
2-Chlorophenol	34586
2-Hexanone	77103
2-Propanol (Isopropyl Alcohol)	81310
3,3-Dichlorobenzidine	34631
4,4-DDD	39310
4,4-DDE	39320
4,4-DDT	39300

LIST L2 (cont.)

<u>Annual Leachate Monitoring Parameters</u>	<u>STORET</u>
4,6-Dinitro-O-Cresol	34657
4-Bromophenyl Phenyl Ether	34636
4-Chlorophenyl Phenyl Ether	34641
4-Methyl-2-Pentanone	78133
4-Nitrophenol	34646
Acenaphthene	34205
Acetone	81552
Alachlor	77825
Aldicarb	39053
Aldrin	39330
Alpha - BHC	39337
Aluminum	01105
Ammonia Nitrogen - N	00610
Anthracene	34220
Antimony	01097
Aroclor-1016	34671
Aroclor-1221	39488
Aroclor-1232	39492
Aroclor-1242	39496
Aroclor-1248	39500
Aroclor-1254	39504
Aroclor-1260	39508
Arsenic (total)	01002
Atrazine	39033
Bacteria (Fecal Coliform)	31616
Barium	01007
Benzene	34030
Benzo (a) Anthracene	34526
Benzo (a) Pyrene	34247
Benzo (b) Fluoranthene	34230
Benzo (ghi) Perylene	34521
Benzo (k) Fluoranthene	34242
Beryllium (total)	01012
Beta - BHC	39338
Bicarbonate	
Biochemical Oxygen Demand (BOD ₅)	00310
Bis (2-Chloro-1-Methylethyl) Ether	73522
Bis (2-Chloroethoxy) Methane	34278

LIST L2 (cont.)

<u>Annual Leachate Monitoring Parameters</u>	<u>STORET</u>
Bis (2-Chloroethyl) Ether	34273
Bis (2-Ethylhexyl) Phthalate	39100
Bis(Chloromethyl)Ether	34268
Boron	01022
Bromobenzene	81555
Bromochloromethane	77297
Bromodichloromethane	32101
Bromoform	32104
Bromomethane	34413
Butanol	45265
Butyl Benzyl Phthalate	34292
Cadmium (total)	01027
Calcium	00916
Carbofuran	81405
Carbon Disulfide	77041
Carbon Tetrachloride	32101
Chemical Oxygen Demand (COD)	00335
Chlordane	39350
Chloride	00940
Chlorobenzene	34301
Chloroethane	34311
Chloroform	32106
Chloromethane	34418
Chromium	01034
Chrysene	34320
Cis-1,2-Dichloroethylene	77093
Cobalt	01037
Copper (total)	01042
Cyanide	00720
DDT	39370
Delta - BHC	46323
Di-N-Butyl Phthalate	39110
Di-N-Octyl Phthalate	34596
Dibenzo (a,h) Anthracene	34556
Dibromochloromethane	32105
Dibromomethane	77596
Dichlorodifluormethane	34668
Dieldrin	39380

LIST L2 (cont.)

<u>Annual Leachate Monitoring Parameters</u>	<u>STORET</u>
Diethyl Phthalate	34336
Dimethyl Phthalate	34341
Endosulfan I	34361
Endosulfan II	34356
Endosulfan Sulfate	34351
Endrin	39390
Endrin Aldehyde	34366
Ethyl Acetate	81585
Ethylbenzene	78113
Ethylene Dibromide (EDB)	77651
Fluoranthene	34376
Fluorene	34381
Fluoride	00951
Heptachlor Epoxide	39420
Heptachlor	39410
Hexachlorobenzene	39700
Hexachlorobutadiene	39702
Hexachlorocyclopentadiene	34386
Hexachloroethane	34396
Ideno (1,2,3-cd) Pyrene	34403
Iodomethane	77424
Iron	01045
Isopropylbenzene	77223
Lead	01051
Lindane	39782
Magnesium	00927
Manganese	01055
Mercury	71900
Methoxychlor	39480
Methyl Chloride	34418
Methyl Ethyl Ketone	81595
Methylene Bromide	77596
Methylene Chloride	34423
Naphthalene	34696
Nickel	01067
Nitrate-Nitrogen	00620
Nitrobenzene	34447
Oil, Hexane Soluble (or Equivalent)	00550

LIST L2 (cont.)

<u>Annual Leachate Monitoring Parameters</u>	<u>STORET</u>
Parathion	39540
Pentachlorophenol	39032
Phenanthrene	34461
Phenols	32730
Phosphorous	00665
Polychlorinated Biphenyls	39516
Potassium	00937
Pyrene	34469
Selenium	01147
Silver	01077
Sodium	00929
Styrene	77128
Sulfate	00945
Tert-Butylbenzene	77353
Tetrachlorodibenzo-p-Dioxins	34675
Tetrachloroethylene	34475
Tetrahydrofuran	81607
Thallium	01059
Tin	01102
Toluene	34010
Total Dissolved Solids (TDS)	70300
Total Organic Carbon (TOC)	00680
Total Suspended Solids	00530
Toxaphene	39400
Trans-1,2-Dichloroethylene	34546
Trans-1,3-Dichloropropene	34699
Trichloroethylene	39180
Trichlorofluoromethane	34488
Tritium	82126
Vanadium	01087
Vinyl Acetate	77057
Vinyl Chloride	39175
Xylene	81551
Zinc	01092
m-Dichlorobenzene	34566
m-Xylene	77134
n-Butylbenzene	77342
n-Nitrosodimethylamine	34438

LIST L2 (cont.)

<u>Annual Leachate Monitoring Parameters</u>	<u>STORET</u>
n-Nitrosodiphenylamine	34433
n-Nitrosodipropylamine	34428
n-Propylbenzene	77224
o-Chlorotoluene	77275
o-Dichlorobenzene	34536
o-Nitrophenol	34591
o-Xylene	77135
p-Chlorotoluene	77277
p-Cresol	77146
p-Dichlorobenzene	34571
p-Isopropyltoluene	77356
p-Nitrophenol	34646
p-Xylene	77133
sec-Butylbenzene	77350

LIST L3

RCRA Parameters for Leachate and Condensate

<u>Ignitability</u>	<u>STORET</u>
Flashpoint, Pensky-Martens Closed Cup (°F)	00497
<u>Corrosivity</u>	
pH	00400
<u>Reactivity</u>	
Reactive Cyanide	99040
Reactive Sulfide	99042
<u>Toxicity (TCCLP)</u>	
Arsenic	99012
Barium	99014
Cadmium	99016
Chromium	99018
Chromium, Hexavalent	99019

LIST L3 (cont.)

RCRA Parameters for Leachate and Condensate

Lead	99020
Mercury	99022
Selenium	99024
Silver	99026
Endrin	99028
Lindane	99030
Methoxychlor	99032
Toxaphene	99034
2,4-D	99036
2,4,5-TP Silvex	99038
Benzene	99128
Carbon tetrachloride	99050
Chlordane	99148
Chlorobenzene	99096
Chloroform	99149
o-Cresol	99150
m-Cresol	99151
p-Cresol	99152
Cresol	99153
1,4-Dichlorobenzene	99154
1,2-Dichloroethane	99155
1,1-Dichloroethylene	99156
2,4-Dinitrotoluene	99157
Heptachlor (and its epoxide)	99158
Hexachlorobenzene	99159
Hexachloro-1, 3-Butadiene	99160
Hexachloroethane	99161
Methyl Ethyl Ketone	99060
Nitrobenzene	99062
Pentachlorophenol	99064
Pyridine	99066
Tetrachloroethylene	99068
Trichloroethylene	99076
2,4,5-Trichlorophenol	99078
2,4,6-Trichlorophenol	99080
Vinyl Chloride	99162

VIII. GROUNDWATER MONITORING

1. **The groundwater monitoring program must be capable of determining background groundwater quality hydraulically upgradient of and unaffected by the units and to detect, from all potential sources of discharge, any releases to groundwater within the facility. This Agency reserves the right to require installation of additional monitoring wells as may be necessary to satisfy the requirements of this permit.**
2. **All groundwater monitoring wells shall be constructed and maintained in accordance with the requirements of 35 Ill. Adm. Code, 811.318(d) and designs approved by the Agency. All wells added to the groundwater monitoring program pursuant to this permit shall be constructed of stainless steel within the saturated zone or similar inert material pre-approved by the Agency.**
3. **Within 60 days of installation, of any groundwater monitoring well, boring logs compiled by a qualified geologist, well development data and as-built diagrams shall be submitted to the Agency utilizing the enclosed "Well Completion Report" form. For each well installed pursuant to this permit, one form must be completed.**
4. **Groundwater monitoring wells shall be easily visible, labeled with their Agency monitoring point designations and fitted with padlocked protective covers.**
5. **In the event that any well becomes consistently dry or unserviceable and therefore requires replacement, a replacement well shall be installed within ten (10) feet of the existing well. The Agency shall be notified in writing at least 15 days prior to the installation of all replacement wells. A replacement well that is more than ten feet from the existing well or which does not monitor the same geologic zone is considered to be a new well and must be approved via a significant modification permit.**
6. **All drill holes, including exploration borings that are not converted into monitoring wells and monitoring wells that are no longer necessary to the operation of the site, shall be abandoned in accordance with the standards in 35 Ill. Adm. Code, 811.316 and the decommissioning and reporting procedures contained in the Illinois Department of Public Health's Water Well Construction Code, 77 IAC, Part 920 (effective 1/1/92). In the event that specific guidance is not provided by IDPH procedures, the enclosed IEPA monitoring well plugging procedures shall be followed. This information shall be entered into the facility operating record.**
7. **Elevation of stick-up is to be surveyed and reported to the Agency:**
 - a. **When the well is installed (with the as-built diagrams),**

- b. Every two years thereafter, or
 - c. Whenever there is reason to believe that the elevation has changed.
8. Groundwater sampling and analysis shall be performed in accordance with the requirements of 35 Ill. Adm. Code 811.318(e) and the specific procedures and methods approved by the Agency.
 9. Background groundwater quality shall be determined using upgradient well G124. Background shall be established for pH and all parameters in Lists G1 and G2.

Background values for the following constituents from List G2 shall be calculated using a minimum of four (4) consecutive quarters of groundwater monitoring data and employing the statistical method described in "Statistical Analysis Method" on p. 33 and steps 1 through 3 on pp. 34 and 35 of Attachment 9 to the application, Log No. 1994-449. All constituents shall be evaluated using an analytical method with a PQL/MDL that is less than the appropriate 35 IAC 620.410 and 35 IAC 302.304 standards. All background values shall be submitted to the Agency in a significant permit modification no later than August 15, 1997.

<u>CONSTITUENT</u>	<u>STOREI</u>	<u>REFERENCE STANDARD</u>
Antimony	01097	35 IAC 620.410
Benzo(a)Pyrene	34247	35 IAC 620.410
Dalapon	38432	35 IAC 620.410
(Di(2-Ethylhexyl)Phthalate	39100	35 IAC 620.410
Dinoseb (DNBP)	81287	35 IAC 620.410
Endosulfan	38926	35 IAC 620.410
Ethylene Dithionide (EDB)	77651	35 IAC 620.410
Pentachlorophenol	39032	35 IAC 620.410
Picloram	39720	35 IAC 620.410
Polychlorinated Biphenyls	39516	35 IAC 620.410
Simazine	39055	35 IAC 620.410
Thallium	01039	35 IAC 620.410
Vinyl Chloride	39175	35 IAC 620.410
1,2-Dibromo-3-Chloropropane	38760	35 IAC 620.410
Heptachlor Epoxide	39420	35 IAC 302.304
Phenols	32730	35 IAC 302.304
Selenium	01147	35 IAC 302.304
Bromochloropropane	77297	NA

LIST G1 (Quarterly Groundwater Monitoring List)

<u>FIELD PARAMETERS</u>	<u>STORE NUMBER</u>	<u>BACKGROUND</u>
*Bottom of Well Elevation (ft. ref MSL)	72020	---
Depth to Water (ft. below land Surface)	72019	---
Depth to Water (ft. from measuring point)	72109	---
Elevation of Groundwater Surface (ft. ref MSL)	71993	---
pH (units, unfiltered)	00400 (range)	6.99--7.66
Specific Conductance (umhos/cm, unfiltered)	00094	---
Temperature of Water Sample (deg. F)	00011	---

(* = Reported Annually)

<u>INDICATOR PARAMETERS (ug/L.)</u>	<u>STORE NUMBER</u>	<u>BACKGROUND</u>
-------------------------------------	---------------------	-------------------

Filtered

Ammonia as (N) (mg/L.)	00008	3.456
Arsenic	01000	77
Boron	01020	155
Cadmium	01025	5
Chloride (mg/L.)	00941	10
Iron	01046	2333
Lead	01049	5
Manganese	01056	256
Mercury	71890	2
Sulfate (mg/L.)	00946	9.7
Total Dissolved Solids (TDS, mg/L.)	70300	607.94
Zinc	01090	328

Unfiltered

Cyanide (Total)	00720	40
Phenols (Total Recoverable)	12730	5
Total Organic Carbon (TOC) (mg/L.)	00680	7.31
Total Organic Halogen (TOX)	78115	5

LIST G2 (Annual Groundwater Monitoring List)

<u>PARAMETERS (ug/L)</u>	<u>STORET NUMBER</u>	<u>BACKGROUND</u>
Unfiltered		
Acetone	81552	100
# Alachlor	77825	0.2
# Aldicarb	39053	0.5
@ Aldrin	39330	0.05
Aluminum	01105	8716
Ammonia (as N) (mg/L)	00610	3.456
# Antimony	01097	
# Arsenic	01002	95
# Atrazine	39033	1
# Barium	01007	355
# Benzene	34030	5
# Benzo(a)Pyrene	34247	
# Beryllium	01012	3
BOD (mg/L)	00310	2
# Boron	01022	237
* Bromobenzene	81555	5
* Bromochloromethane (chlorobromomethane)	77297	
* Bromodichloromethane	32101	5
* Bromoform	32104	5
* Bromomethane	34413	10
* n-Butylbenzene	77342	5
* sec-Butylbenzene	77350	5
* tert-Butylbenzene	77353	5
# Cadmium	01027	5
Calcium (mg/L)	00916	674.922
# Carbofuran	81405	0.9
# Carbon Tetrachloride	32102	5
Chemical Oxygen Demand (COD) mg/L	00335	113.1
# Chlordane	39350	0.1
# Chloride (mg/L)	00940	1
#* Chlorobenzene	34301	5
* Chloroethane	34311	10
* Chloroform	32106	5
* Chloromethane	34418	10
* o-Chlorotoluene	77275	5
* p-Chlorotoluene	77277	5
# Chromium	01034	63
* Chlorodibromomethane (Dibromochloromethane)	32105	5

LIST G2 (Annual Groundwater Monitoring List)

<u>PARAMETERS (ug/L)</u>	<u>STORET NUMBER</u>	<u>BACKGROUND</u>
<u>Unfiltered</u>		
# Cobalt	01037	70
# Copper	01042	107
p-Cresol	77146	10
# Cyanide (mg/L)	00720	40
# Dalapon	38432	
@ DDT	39370	0.1
*Dibromomethane	77596	5
*m-Dichlorobenzene	34566	5
#*o-Dichlorobenzene	34536	5
# p-Dichlorobenzene	34571	5
*Dichlorodifluoromethane	34668	5
#*Dichloromethane (Methylene Chloride)	34423	5
@ Dieldrin	39380	0.05
# Di(2-Ethylhexyl)Phthalate	39100	
Diethyl Phthalate	34336	10
Dimethyl Phthalate	34341	10
Di-N-Butyl Phthalate	39110	10
# Dinoseb (DNBP)	81287	
# Endothall	38926	
# Endrin	39390	0.1
#*Ethylbenzene	78113	5
#*Ethylene Dibromide (EDB) (1,2-Dibromo ethane)	77651	
# Fluoride	00951	610
# Heptachlor	39410	0.05
# Heptachlor Epoxide	39420	
*Hexachlorobutadiene	39702	10
# Hexachlorocyclopentadiene	34386	10
Iodomethane	77424	5
# Iron	01045	34,819
*Isopropylbenzene	77223	5
*p-Isopropyltoluene	77356	5
# Lead	01051	49.7
# Lindane	39782	0.05
Magnesium (mg/L)	00927	238,579
# Manganese	01055	1,456
# Mercury	71900	2
# Methoxychlor	39480	2

LIST G2 (Annual Groundwater Monitoring List) (cont.)

<u>PARAMETERS (ug/L)</u>	<u>STORET NUMBER</u>	<u>BACKGROUND</u>
<u>Unfiltered</u>		
*Naphthalene	34696	10
# Nickel	01067	98
# Nitrate-Nitrogen (mg/L)	00620	0.128
@ Oil(Hexane-Soluble or Equivalent) mg/L	00550	2.6
@ Parathion	39540	10
# Pentachlorophenol	39032	
pH	00400	6.99--7.66
# Phenols	32730	
# Picloram	39720	
# Polychlorinated Biphenyls	39516	
Potassium (mg/L)	00937	4.88
*n-Propylbenzene	77224	5
# Selenium	01147	
# Silver	01077	10
# Simazine	39055	
Sodium (mg/L)	00929	33.227
#* Styrene	77128	5
# Sulfate (mg/L)	00945	6
# TDS (Dried at 180°, mg/L)	70300	607.94
TOC mg/L	00680	7.31
TOX	78115	5
#* Tetrachloroethylene	34475	5
Tetrahydrofuran	81607	225.8
# Thallium	01059	
#* Toluene	34010	5
# Toxaphene	39400	2
# Trichloroethylene (or ethene)	39180	5
*Trichlorofluoromethane	34488	5
Vanadium	01087	43
# Vinyl Chloride	39175	
# Xylenes	81551	5
*m-Xylene	77134	5
*o-Xylene	77135	5
*p-Xylene	77133	5
# Zinc	01092	1201
*1,1,1,2-Tetrachloroethane	77562	5
# 1,1,1-Trichloroethane (methylchloroform)	34506	5
*1,1,2,2-Tetrachloroethane	34516	5

LIST G2 (Annual Groundwater Monitoring List) (cont.)

<u>PARAMETERS</u> (ug/L)	<u>STORET NUMBER</u>	<u>BACKGROUND</u>
<u>Unfiltered</u>		
#*1,1,2-Trichloroethane	34511	5
*1,1-Dichloroethane	34496	5
# 1,1-Dichloroethylene	34501	5
*1,1-Dichloropropene	77168	5
*1,2,3-Trichlorobenzene	77613	10
*1,2,3-Trichloropropane	77443	5
#*1,2,4-Trichlorobenzene	34551	10
*1,2,4-Trimethylbenzene	77222	5
#*1,2-Dibromo-3-Chloropropane (DBCP)	38760	
#*cis-1,2-Dichloroethylene	77093	5
#*trans-1,2-Dichloroethylene	34546	5
# 1,2-Dichloroethane	34531	5
#*1,2-Dichloropropane	34541	5
*1,3,5-Trimethylbenzene	77226	5
*1,3-Dichloropropane	77173	5
*1,3-Dichloropropene	34561	5
trans-1,4-Dichloro-2-Butene	73547	5
*2,2-Dichloropropane	77170	5
# 2,4,5-TP (Silvex)	39760	2
# 2,4-Dichlorophenoxyacetic Acid (2,4-D)	39730	10
2-Butanone(Methyl Ethyl Ketone)	81595	100
4-Methyl-2-Pentanone	78133	50

- Note:
- All filtered parameters shall be determined using groundwater samples which have been filtered through a 0.45 micron filter. All other parameters shall be determined from unfiltered samples.
 - The monitoring results should be reported in ug/l units unless otherwise indicated.
 - Some of the preceding parameters may be deleted from the list depending on the results of the leachate analysis. However, the 51 organics from 40 CFR 141.40 and the parameters from 35 Ill. Adm. Code 620.410 and the parameters from 35 Ill. Adm. Code 302 may not be deleted.
 - (* Denotes 40 CFR 141.40 parameters

- ii. (#) Denotes 35 Ill. Adm. Code 620 parameters
- iii. (@) Denotes 35 Ill. Adm. Code 302 parameters

10. The following monitoring points are to be used in the groundwater monitoring program for this facility and located as referenced by Figure 2 in Attachment 9 of the application, Log No. 1994-449. All wells added to the monitoring program shall be ready for sampling during the July-August, 1996, sampling event.

Background Groundwater Quality Well

<u>Applicant Designation</u>	<u>Agency Designation</u>
G124	+G124
Detection Monitoring Wells	
G112	G112
G113	*G113
G121	*G121
G122	*G122
G123	*G123
G125	*G125
G126	G126
G127	G127
Piezometers[®]	
P94-1	P194
G114	P114
G115	P115
G116	P116
Assessment Monitoring Well	
G01A	*G01A

+Represents upgradient monitoring point(s)

#Represents monitor point(s) added to the monitoring program

*Represents monitor point(s) deleted from the monitoring program

^ Represents monitor point(s) being sampled to evaluate impacts to the groundwater

® The Piezometers shall be maintained for measuring groundwater elevations and for assessment groundwater quality sampling, only, as such measurements and sampling are required

*Well G01A shall be sampled in accordance with Condition VIII.19, only.

11. The approved monitoring program, shall begin during the July-August, 1996, sampling event and continue for at least thirty (30) years after closure and shall not cease until the conditions described in 35 Ill. Adm. Code, 811.319(a)(1)(C) have been achieved. The operator shall collect samples from all of the monitoring points listed in Condition VIII.10 (excluding the piezometers) and report the analytical results to the Agency in accordance with the following schedule:

<u>Sampling Period</u>	<u>Parameter List</u>	<u>Report Due Date</u>
January or February	List G1	April 15
April or May	Lists G1 and G2	July 15
July or August	List G1	October 15
October or November	List G1	January 15

12. Pursuant to 35 Ill. Adm. Code, 811.319(a)(4)(A), any of the following events shall constitute an observed increase only if the concentration of the constituents monitored can be measured at or above the practical quantitation limit (PQL):
- The concentration of any quarterly indicator parameter given in List G1 shows a progressive increase over four (4) consecutive quarters.
 - The concentration of any constituent given in List G1 or G2 exceeds a 35 Ill. Adm. Code 620 Subpart D Groundwater Quality Standard or the Groundwater Standards as provided in 35 Ill. Adm. Code 814.402(b)(3) at an established monitoring point.
 - The concentration of any organic constituent in List G2 monitored in accordance with Condition 11 of this Section exceeds the preceding measured concentration at any established point.
 - The concentration of any constituent in List G1 or G2 exceeds its background concentration.
13. For each round of sampling described in Condition 11 of this Section, the operator must determine if an observed increase has occurred within 45 days of the date the samples were collected. If an observed increase is identified, the operator must also notify the Agency in writing within 10 days and follow the confirmation procedures of 35 IAC. 811.319(a)(4)(B). Furthermore, the operator must complete the confirmation procedures within 90 days of the initial sampling event.
14. Within 90 days of confirmation of any monitored increase, the operator shall submit a permit application for a significant modification to begin an assessment monitoring program pursuant to 35 Ill. Adm. Code 811.319(b) in order to confirm whether the solid waste disposal facility is the source of the contamination.

15. This issuance of this permit does not constitute agreement or approval of the input parameters and assumptions utilized in the monitoring well-spacing model provided in the application, Log No. 1994-449.
16. The operator shall submit a significant modification application to the Agency by December 15, 1996, to establish a groundwater management zone (GMZ) in accordance with 35 IAC 620.250. The GMZ shall be the three dimensional area that encompasses all groundwater surrounding well G113 in which the concentration of any chemical constituent exceeds its background concentration due to a release from the facility. The application shall include sampling data from wells G113, G121, G122, G123, G125 and any additional wells necessary to establish the spatial extent of impacts. The application shall also identify all parameters in Condition VIII.9, Lists G1 and G2, that are found in the groundwater within the proposed GMZ at levels that exceed their natural background concentrations.
17. Each quarter the operator shall calculate the mean concentration of the following parameters using the most recent four (4) quarters of data from well G113. In the event that the calculated mean concentration of a parameter sampled in well G113 in accordance with this condition increases for two (2) consecutive quarters, the operator shall notify the Agency in writing within 10 days of the determination. Within 90 days of the determination the operator shall begin implementation of the contingency groundwater remediation plan.

<u>PARAMETERS (ug/L.)</u>	<u>STORET NUMBER</u>
<u>Unfiltered</u>	
Chloride (mg/L)	00941
Iron	01046
Total Dissolved Solids (TDS, mg/L)	70300
<u>Unfiltered</u>	
Total Organic Carbon (TOC) (mg/L)	00680
Total Organic Halogen (TOX)	78115

18. Annually the operator shall submit to the Agency a report on the trends in groundwater quality in well G113, and the wells within or immediately surrounding the impacted area, in a significant modification application by July 15. The report shall include both interwell and intrawell trend analyses including, at a minimum, a comparison of the groundwater quality in wells G113, G121, G122, G123, and G125 during the four consecutive quarters ending with the most recent second quarter to the background

concentrations in Condition 9 of this Section; the 35 IAC Part 302 Subpart C: Public and Food Processing Water Supply Standards; and the 35 IAC 620.410 Groundwater Quality Standards for Class I: Potable Resource Groundwater. The report may include the application of any appropriate statistical analysis method(s) described in 35 IAC 811.320(e). The report shall include, at a minimum, all chemical analysis data collected during the previous four (4) quarters for each well, the results and conclusions of the trend analyses, and any recommendation(s) for further action.

If the report concludes that groundwater quality in the impacted area has not achieved the appropriate cleanup objectives and the groundwater quality is no longer improving, the report shall include a proposal to implement the groundwater extraction trench contingency plan within ninety (90) days of permit approval.

19. In order to determine if the facility is the source of the tetrahydrofuran, butyl benzyl phthalate, and di-n-octyl phthalate detected in well G124, the operator shall install an assessment monitoring well, well G01A, approximately 200 feet southwest of well G124 and within 50 feet of, or as close as possible to, the waste boundary. This well shall be screened in the same hydrogeologic unit as well G124. At a minimum, the well shall be sampled for the following parameters detected in leachate monitoring point L310 in June, 1996, or well G124 in August, 1995, and all Special Condition VIII.9 List G1 Field Parameters. The results shall be reported to the Agency in a significant modification application by April 15, 1997. The report should include all sampling data (including field trip, trip and lab blanks), a comparison of the sampling results to the background concentrations of Special Condition VIII.9, and all conclusions and recommendations for further action [e.g., an assessment program in accordance with 35 IAC 811.319(b) or a return to detection monitoring].

PARAMETERS

STORETS

Unfiltered

phenols (mg/l)	32730
TDS (dried at 180°) (mg/l)	70300
ammonia (as N) (mg/l)	00610
barium (mg/l)	01007
nickel (ug/l)	01067
alkalinity (CaCO ₃) (mg/l)	00410
chloride (mg/l)	00940
TOC (mg/l)	00680
boron (ug/l)	01022
potassium (mg/l)	00937
sodium (mg/l)	00929
vanadium (ug/l)	01087

PARAMETERS

STORETS

Unfiltered

2-butanone (ug/l)	81595
tetrahydrofuran (ug/l)	81607
butyl benzyl phthalate (ug/l)	34292
di-n-octyl phthalate (ug/l)	34596

IX. LANDFILL GAS MANAGEMENT/MONITORING

1. The landfill gas monitoring plan described in Permit Application Log No. 1994-449 is approved. The gas monitoring probes within the waste boundary described in Application Log No. 1994-449 shall be installed and put into service within 90 days after final cover has been applied to the various areas where they are located.
2. The gas monitoring probes both inside and outside the waste boundary shall be monitored for the following parameters:
 - a. Methane;
 - b. Pressure;
 - c. Nitrogen*;
 - d. Oxygen; and
 - e. Carbon Dioxide

*NOTE: For routine monitoring, Nitrogen may be reported as the net remaining volume fraction after the other measured constituents have been accounted for.

3. The ambient air monitoring devices described in the Application Log No. 1994-449 shall be used to test the air downwind of the landfill for methane.
4. All buildings within the facility boundaries shall be monitored continuously for methane.
5. Gas monitoring shall begin immediately, shall continue for at least 30 years after closure and may be discontinued only after the conditions described in 35 IAC, Section 811.31(c)(4) have been achieved.
6. Sampling and testing of the gas monitoring probes and ambient air monitoring shall be performed at least monthly throughout the remaining operating life and during the first five years after its closure of the unit. Then during the remainder of the post-closure care period, this monitoring frequency may be reduced to quarterly.

7. In the event of any of the occurrences listed below, the operator shall, within 180 days of the occurrence, submit to the Agency an application for a significant modification either proposing a gas collection/management system or demonstrating that the facility is not the cause of the occurrence.
 - a. A methane concentration greater than 50 percent of the explosive limit in air is detected in any of the below ground monitoring devices outside the waste boundary;
 - b. A methane concentration greater than 50 percent of the explosive limit in air is detected during ambient air monitoring;
 - c. A methane concentration greater than 25 percent of the explosive limit in air is detected in any building on or near the facility; or
 - d. Malodors attributed to the unit are detected beyond the property boundary.
8. The gas probes shall be inspected at least monthly for structural integrity and proper operation.
9. The results from gas monitoring for each calendar year shall be submitted to the Agency in the annual report required by 35 IAC, Section 813.501.
10. At the end of the post-closure care period, the gas monitoring probes shall be decommissioned. The probes outside the waste boundary shall be decommissioned using the method described in the enclosed Agency monitoring well plugging procedure guidance. In decommissioning the probes within the waste boundaries, the pipes shall be cut off at least two (2) feet below the low permeability layer and plugged. Then the low permeability layer, the protective layer and the vegetation shall be restored in the excavated areas.

X. CLOSURE/POST CLOSURE CARE AND FINANCIAL ASSURANCE

1. The facility shall be closed in accordance with the closure plan in Application Log No. 1994-449. The closure plan includes a plan for temporary suspension of waste acceptance. Upon completion of closure activities, the operator shall notify the Agency that the site has been closed in accordance with the approved closure plan utilizing the Agency's "Affidavit for Certification of Completion of Closure of Non-Hazardous Waste Facilities."
2. Inspections of the closed landfill shall be conducted in accordance with the approved post-closure care plan in Permit Application Log No. 1994-449. Records of field

investigations, inspections, sampling and corrective action taken are to be maintained at the site and made available to IEPA personnel. During the post-closure care period, these records are to be maintained at the office of the site operator.

3. If necessary, the soil over the entire planting area shall be amended with lime, fertilizer and/or organic matter. On sideslopes, mulch or some other form of stabilizing material is to be provided to hold seed in place and conserve moisture.
4. When the post-closure care period has been completed, the operator shall notify the Agency utilizing the Agency's "Affidavit for Certification of Completion of Post-Closure Care for Non-Hazardous Waste Facilities."
5. The operator shall maintain financial assurance for closure and post-closure care pursuant to 35 IAC, Section 811.700(b).
6. The total cost estimate for closure and post closure care for this facility approved by this permit is \$1,798,590. Financial assurance shall be maintained in this amount.
7. The operator shall increase the total amount of financial assurance so as to equal the current cost estimate within 90 days of an increase in the current cost estimate in accordance with 35 IAC, 811.701(b).

XI. REPORTING REQUIREMENTS

1. The annual report for each calendar year shall be submitted to the Agency by May 1 of the following year pursuant to 35 IAC, Section 813.501. The first annual report shall be for the period from the date of issuance of this permit through the end of this calendar year. The annual report shall include:
 - a. A waste volume summary which includes:
 - i. Total volume of solid waste accepted at the facility during the past year in cubic yards as measured at the gate;
 - ii. The remaining solid waste capacity in the unit in cubic yards as measured at the gate; and
 - iii. A copy of all identification reports required under 35 IAC, Section 811.404.
 - b. Monitoring data from the leachate collection system, groundwater monitoring network, and gas monitoring system including:

- i. Graphical results of monitoring efforts;
 - ii. Statistical summaries and analysis of trends;
 - iii. Changes to the monitoring program; and
 - iv. Discussion of error analysis, detection limits and observed trends.
 - c. Proposed activities for the upcoming year including:
 - i. Amount of waste expected, in cubic yards;
 - ii. Structures to be built; and
 - iii. New monitoring stations to be installed.
 - d. The signature of the operator or duly authorized agent as specified in 35 IAC, Section 812.104.
2. The annual report shall also include the following regarding the leachate removal system for the existing fill area:
 - a. A summary of the quantity of leachate removed (each time) from the existing area leachate removal system during the year and;
 - b. An evaluation of the effectiveness of the system.

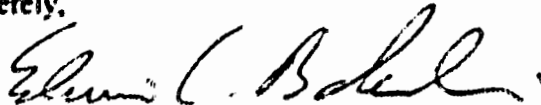
Any change to the removal system for the existing area or its operating plan shall be submitted as an application for significant modification for this facility.

3. In addition to the annual report, the quarterly reports on groundwater and leachate monitoring shall be submitted to the Agency in accordance with the schedules described in Conditions VII.3. and VIII.12, pursuant to 35 IAC, Section 813.501.
4. The original and two (2) copies of all certifications, logs, reports and plan sheets and three (3) copies of groundwater monitoring chemical analysis forms which are required to be submitted to the Agency by the permittee should be mailed to the following address:

Illinois Environmental Protection Agency
Planning and Reporting Section
Division of Land Pollution Control -- #24
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

Within 35 days after the date of mailing of the Agency's final permit decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Agency, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Agency within the 35-day initial appeal period.

Sincerely,



Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

ECB:SA^Ams 9681 IS.WPD
Sas

cc: Bryan C. Johnsrud, P.E., AEEI
Patricia K. Welch, Tazewell County Health Department

**STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

July 1, 1979

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

These standard conditions shall apply to all permits which the Agency issues for construction or development projects which require permits under the Divisions of Water Pollution Control, Air Pollution Control, Public Water Supplies, and Land and Noise Pollution Control. Special conditions may also be imposed by the separate divisions in addition to these standard conditions.

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire two years after date of issuance unless construction or development on this project has started on or prior to that date.
2. The construction or development of facilities covered by this permit shall be done in compliance with applicable provisions of Federal laws and regulations, the Illinois Environmental Protection Act, and Rules and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification of the project, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The permittee shall allow any agent duly authorized by the Agency upon the presentation of credentials:
 - a. to enter at reasonable times the permittee's premises where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit.
 - b. to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit.
 - c. to inspect at reasonable times, including during any hours of operation of equipment constructed or operated under this permit, such equipment or monitoring methodology or equipment required to be kept, used, operated, calibrated and maintained under this permit.

- d. to obtain and remove at reasonable times samples of any discharge or emission of pollutants.
 - e. to enter at reasonable times and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
- a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located;
 - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities;
 - c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations;
 - d. does not take into consideration or attest to the structural stability of any units or parts of the project;
 - e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
6. Unless a joint construction/operation permit has been issued, a permit for operating shall be obtained from the Agency before the facility or equipment covered by this permit is placed into operation.
7. These standard conditions shall prevail unless modified by special conditions.
8. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
- a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed; or
 - b. upon finding that any standard or special conditions have been violated; or
 - c. upon any violation of the Environmental Protection Act or any Rule or Regulation effective thereunder as a result of the construction or development authorized by this permit.

STATE OF ILLINOIS)
) SS:
COUNTY OF SANGAMON)

AFFIDAVIT OF GREGORY D. KUGLER

Gregory D. Kugler, being first duly sworn, on oath deposes and states as follows:

1. That he is an adult residing in Sangamon County, Illinois, and is fully competent to testify to the facts contained herein, and would so testify if called upon to testify under oath at a hearing on this matter.

2. That he is Vice-President of Andrews Environmental Engineering, Inc., Springfield, Illinois, and is familiar with the landfill operated by Waste Professionals, Inc. under the name and description of Pekin Landfill, located in rural Tazewell County, Illinois, as a client of his office.

3. That this affidavit is being submitted in support of an Amended Petition for Adjusted Standard filed by Waste Professionals, Inc., d/b/a Pekin Landfill, which petition was prepared, in part, by your affiant.

4. That he is familiar with the regulatory requirement for Subpart C landfills to prepare a groundwater contaminant transport (GCT) model, and with the costs attendant to such preparation.


5. That he is personally familiar with the estimate made by his office (Andrews Environmental Engineering, Inc.) of the cost of preparing such a GCT model for the Southeast Trench at Pekin

collect additional information to establish background concentrations and approximately \$35,000 in addition to conduct the modelling, for a total of approximately \$55,000.

6. That he knows that the subject Pekin Landfill has received a significant modification permit containing an approved groundwater monitoring program and other information and conditions pertaining to the protection of groundwater, and believes that the results of a GCT model for the Southeast Trench would not result in either design or operational changes of the disposal unit systems at Pekin Landfill, nor would it result in substantially or significantly enhanced effects to the environment or human health.

7. That he is familiar with the fact that the operational expenses of Waste Professionals, Inc., from and after September 18, 1997, will be greater if Pekin Landfill is open for business under the proposed adjusted standard, as compared to its expenses if it were to cease accepting waste from and after said date, as shown on Exhibit B-1 hereto.

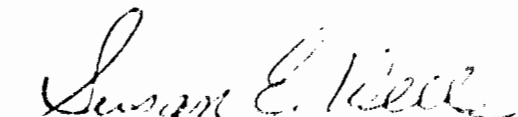
Further Affiant sayeth not.



Gregory D. Kudler

Subscribed and sworn to before me this 4th day of September, 1997.





Notary Public

EXHIBIT B-1

PEKIN LANDFILL TABLE LEGEND

- Series 1 Operating costs for extension
- Series 2 Operating costs for closure
- Series 3 Capital costs for extension
- Series 4 Capital costs for closure
- Series 5 Total costs for extension
- Series 6 Total costs for closure

Note: Costs were estimated for a 14-month period.

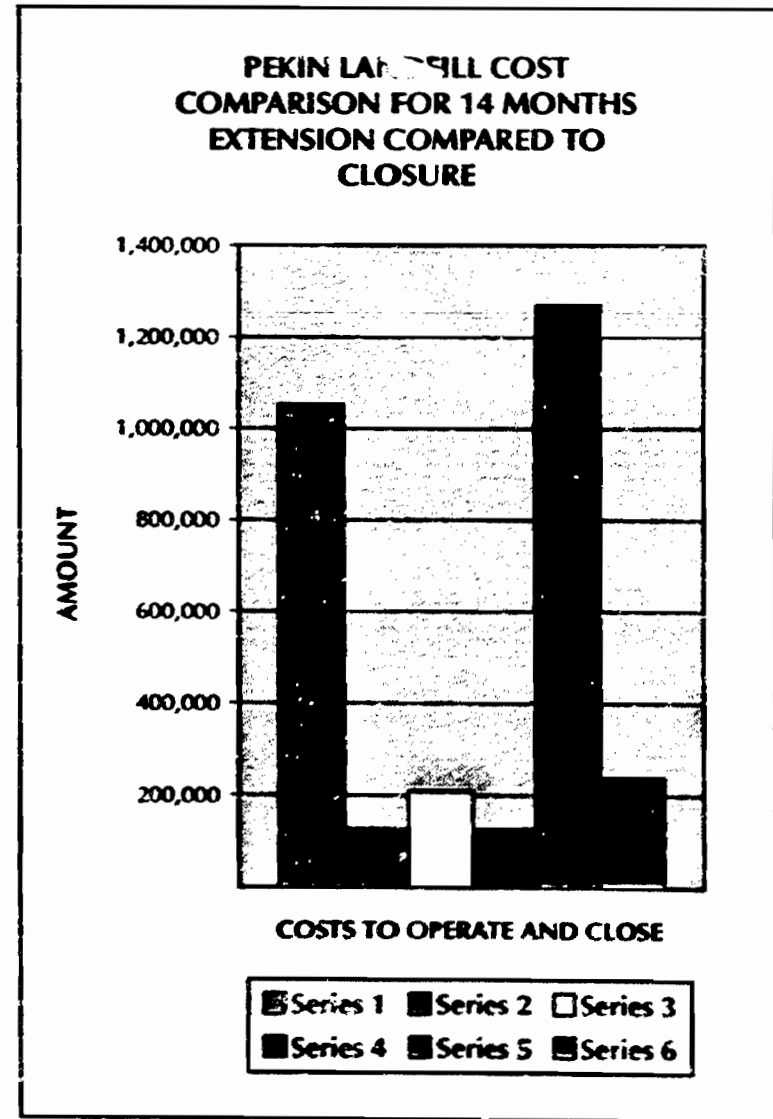


EXHIBIT B-1

PEKIN LANDFILL TABLE LEGEND

- Series 1 Operating costs for extension
- Series 2 Operating costs for closure
- Series 3 Capital costs for extension
- Series 4 Capital costs for closure
- Series 5 Total costs for extension
- Series 6 Total costs for closure

Note: Costs were estimated for a 14-month period.

