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AUG 31 2015

STATE OF ILLINOIS
Pollution Control Board

ILLINOIS POLLUTION CONTROL BOARD
August 31, 2015

IN THE MATTER OF:)
)
PETITION OF THE CITY OF)
COLLINSVILLE FOR AN ADJUSTED) AS 15-3
STANDARD FROM 35 Ill. ADM. CODE) (Adjusted Standard - Water)
620.410 FOR CERTAIN CONSTITUENTS)



ORIGINAL

HEARING OFFICER ORDER

On August 31, 2015, the parties participated in a telephone status conference with the hearing officer. Attached to this order are additional questions for the Illinois Environmental Protection Agency. The Agency's responses to all outstanding questions are due by October 19, 2015. Upon receipt of the Agency's responses, petitioner is directed to contact the hearing officer within seven days to reserve the right to file a reply.

The parties are directed to participate in a telephone status conference with the hearing officer at 10:00 a.m. on October 19, 2015. The status conference shall be initiated by petitioner.

IT IS SO ORDERED.

Carol Webb

Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
P.O. Box 19274
Springfield, Illinois 62794-9274
217/524-8509
carol.webb@illinois.gov

AS 15-3**BOARD QUESTION FOR
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

1. Collinsville revised the proposed adjusted standard to request there be “no comparison to background” for the constituents listed below. Resp. to HOO, Att. 1.

p-Dioxane
TDS
Chloride
Iron
Arsenic
Manganese
Sulfate
pH
Perchlorate
Ammonia
Boron
TOC
TOX
Zinc

Collinsville states that the reason for including this in the adjusted standard is to “eliminate the comparison to background values” that would trigger assessment provisions to identify a “significant change in groundwater quality” under the permit. Resp. to HOO at 25. Exh. 7-1 states, “According to Supplemental Permit No. 2014-234-SP, if concentrations exceed Class I Groundwater Quality Standards, background values, or two times the PQL, a significant change in groundwater quality is said to have occurred.” Exh. 7-1 at 17. Collinsville states, “If the adjusted standards are approved, the definition of a significant change would require modification for parameters with the new standards.” Resp. to HOO at 34.

Pursuant to 35 Ill. Adm. Code 620.310(a)(3)(A)(ii) where a preventive assessment is used to determine if a “statistically significant increase occurs above background”, the only parameter listed above in the adjusted standard request that is required to be addressed is arsenic. Additionally, 35 Ill. Adm. Code 620 does not contain groundwater quality standards for ammonia, TOC (Total Organic Carbon), or TOX (Total Organic Halogen).

- a. Please explain if Collinsville’s permit subjects Collinsville to preventive response activities based on other constituents, besides those listed in 35 Ill. Adm. Code 620.310(a)(3)(A)(ii). If so, is there a Board standard from which the Board can grant an adjusted standard to allow Collinsville not to compare background concentrations for the constituents listed above other than arsenic?

- b. Please comment on the proposed adjusted standard language attached as to the end of this order (page 4).
- 2. Will Collinsville be required to monitor for other constituents not listed above on a quarterly basis for the first year and annually thereafter for two years under its permit with the adjusted standard?
- 3. Please comment on whether IEPA will issue a certification of closure only upon completion of the groundwater monitoring required by the proposed adjusted standard.

Draft language for a possible Board Order

ORDER

Pursuant to Section 28.1 of the Act (415 ILCS 5/28.1) (2012)), the Board grants the City of Collinsville an adjusted standard from the Class I Groundwater Quality Standards of 35 Ill. Adm. Code 620.410(a), (b), and (e) for the following constituents and parameter. The adjusted groundwater quality standards and conditions, as set forth below, are applicable to the City of Collinsville Landfill (permit number 1972-71) located along Lebanon Road in the northwest quarter of Section 36, Township 3 North, Range 8 West, Madison County.

1. **Areal and Vertical Extent of Adjusted Groundwater Quality Standards**

The adjusted groundwater quality standards set forth below are applicable to the groundwater located within the City of Collinsville property boundaries for the landfill depicted in the Attachment 1 to this order, consisting of Figure A-4 "Horizontal Extent of Pre and Post Landfill Contamination" (August 2015) from Attachment 4 of the City of Collinsville's August 10, 2015 Written Responses to Board Questions for City of Collinsville.

2. **Adjusted Groundwater Quality Standards**

In lieu of the Class I Groundwater Quality Standards found at 35 Ill. Adm. Code 620.410(a), (b), and (e) for the following constituents and parameter, the adjusted standards are set forth below.

a. **Inorganic Chemical Constituents:**

The standards for the following chemical constituents are the existing concentrations:

Arsenic
Chloride
Iron
Manganese
Perchlorate
Sulfate
Total Dissolved Solids (TDS)

b. **Organic Chemical Constituents:**

Except due to natural causes, concentrations of the following organic constituent shall not be exceeded in the groundwater:

<u>Constituent</u>	<u>Units</u>	<u>Adjusted Standard</u>
P-Dioxane	ug/L	51

c. **pH:**

The standard for the pH range is the existing pH.

3. **Preventive Assessment**

The preventive assessment to determine if a statistically significant increase occurs as provided in 35 Ill. Adm. Code 620.310(a)(3)(A)(ii) shall be compared to historic concentrations and not background for the following constituent:

Arsenic

4. **Groundwater Monitoring**

For the constituents and parameter listed in items 2 and 3 above, the City of Collinsville shall provide quarterly monitoring for one year and then annually for two years. Results of the monitoring shall be submitted to the Illinois Environmental Protection Agency (IEPA) with other post-closure monitoring results in accordance with the currently applicable permit for the City of Collinsville Landfill.

5. **Prohibition on Installation of New Potable Water Wells**

Within 12 months of the date of this Order, the City of Collinsville shall secure and record with the county recorder's office one or more of the following instruments that prohibit the installation of potable water wells along Lebanon Road near the landfill: a Memorandum of Understanding with IEPA, Environmental Land Use Control, and/or Environmental Covenant (in accordance with the Uniform Environmental Covenants Act [765 ILCS 122]). The instrument(s) secured must contain IEPA approval and remain in effect until modified or removed by IEPA.

CERTIFICATE OF SERVICE

It is hereby certified that true copies of the foregoing order were mailed, first class, on August 31, 2015, to each of the persons on the service list below.

It is hereby certified that a true copy of the foregoing order was hand delivered to the following on August 31, 2015:

John T. Therriault
 Illinois Pollution Control Board
 James R. Thompson Center
 100 W. Randolph St., Ste. 11-500
 Chicago, Illinois 60601

Carol Webb

Carol Webb
 Hearing Officer
 Illinois Pollution Control Board
 1021 North Grand Avenue East
 P.O. Box 19274
 Springfield, Illinois 62794-9274
 217/524-8509
 Carol.Webb@illinois.gov

SERVICE LIST

AS 2015-003
 James Kropid
 IEPA
 1021 North Grand Avenue East
 P.O. Box 19276
 Springfield, IL 62794-9276

AS 2015-003
 Frank H. Hackmann
 Dentons US LLP
 One Metropolitan Square
 Suite 3000
 St. Louis, MO 63102