

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CONGRESS DEVELOPMENT)
COMPANY,)
)
Petitioner,)
)
v.)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondent.)

14-21
PCB 13-
(Permit Appeal - Air)

ORIGINAL

RECEIVED
CLERK'S OFFICE

OCT 16 2013

STATE OF ILLINOIS
Pollution Control Board

NOTICE OF FILING

John Therriault
Assistant Clerk
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601-3218

Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

PLEASE TAKE NOTICE that today I filed with the Illinois Pollution Control Board a PETITION FOR REVIEW OF DENIAL OF REQUEST FOR ALTERNATIVE COMPLIANCE TIMELINES and Entry of Appearance for Russell R. Eggert and Andrew L. Schulkin, copies of which are hereby served upon you.

Dated: October 16, 2013

Respectfully Submitted,

By:

Russell R. Eggert
Andrew L. Schulkin
LATHROP & GAGE LLP
155 N. Wacker Drive
Suite 3050
Chicago, Illinois 60606
312.920.3300 (Telephone)
312.920.3301 (Facsimile)

Attorneys for Petitioner Congress
Development Company

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

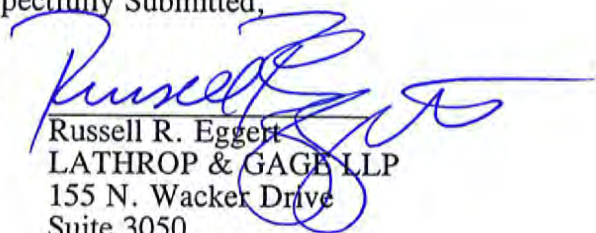
CONGRESS DEVELOPMENT)
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Respondent.)


14-27
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ENTRY OF APPEARANCE

COMES NOW Russell R. Eggert and Andrew L. Schulkin of the law firm Lathrop & Gage LLP, and hereby enter their appearance in the above-styled matter on behalf of Petitioner Congress Development Company.

Respectfully Submitted,

By: 
Russell R. Eggert
LATHROP & GAGE LLP
155 N. Wacker Drive
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Chicago, Illinois 60606
312.920.3300 (Telephone)
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Attorneys for Petitioner Congress Development Company

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CONGRESS DEVELOPMENT)
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on October 16, 2013, the foregoing Entry of Appearance was served upon the following

by hand delivery:

John Therriault
Assistant Clerk
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

by U.S. first class mail:

Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
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Springfield, Illinois 62794-9276

By:

Russell R. Eggert
Andrew L. Schulkin
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100 N. Riverside Plaza
Suite 2100
Chicago, Illinois 60606
312.920.3300 (Telephone)
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Attorneys for Petitioner Congress
Development Company

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CONGRESS DEVELOPMENT COMPANY,)
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Petitioner,)
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ILLINOIS ENVIRONMENTAL PROTECTION)
AGENCY,)
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PCB 13-_____
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STATE OF ILLINOIS
Pollution Control Board

**PETITION FOR REVIEW OF DENIAL OF
REQUEST FOR ALTERNATIVE COMPLIANCE TIMELINES**

Petitioner, CONGRESS DEVELOPMENT COMPANY (“Congress”), requests review, pursuant to 415 ILCS 5/40(a) and 35 Ill. Adm. Code 105.302(c) of the September 12, 2013 Decision (“Decision”) by Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“IEPA” or “Agency”), to deny Congress’s multiple requests for alternative compliance timelines (“ACT”) for certain active landfill gas extraction collectors pursuant to 35 Ill. Adm. Code Part 220 and 40 C.F.R. Part 63, Subpart AAAA. (The “ACT Requests”) (A copy of the Agency’s Decision letter is attached as Exhibit A). Congress asks the Board to reverse IEPA’s Decision, to remand the matter to IEPA for further consideration, and to grant such further relief as the law and the facts justify.

Background and Parties

1. This case is, at its core, the sequel to a case Congress filed with the Board earlier this year, *Congress Development Company v. Illinois Environmental Protection Agency*, PCB No. 13-57.

(a) As the Board will recall, that case had focused on the issue of Higher

Operating Values (“HOVs”) for certain active landfill gas collectors. It was settled after the Agency granted, in part, Congress’s request. *See* the Board’s Order dismissing the case, dated July 11, 2013. (Number 13-57 was, in turn, rooted in an earlier Final Consent Order in a Circuit Court enforcement action, *People v. Congress Development Company*, Cir. Ct. Cook County No. 06 CH 1438. Under that Final Consent Order, Congress was required to comply with the provisions of 35 Ill. Adm. Code Part 220 by June 30, 2013. The Agency’s decision to grant limited HOV relief on June 25, 2013 enabled the parties to settle PCB No. 13-57).

(b) Unfortunately, the limits in the HOVs that the Agency granted on June 25 were more stringent than what Congress had requested. As Congress predicted, shortly thereafter certain of the gas collectors in question exhibited operating characteristics higher than those the Agency had authorized in the HOVs. Congress therefore asked the Agency to issue alternative compliance timelines for those gas collectors, to allow the facility time to comply with the HOVs. It is the Agency’s blanket denial of the ACT Requests that is before the Board in this case.

2. Congress is an Illinois general partnership with its sole place of business in Hillside, Illinois. Congress owns a facility that was utilized as a municipal solid waste landfill from 1980 to 2008. While the facility has been closed since December 31, 2008, it continues to generate gas—a combination byproduct of an abiotic exothermic reaction and the decomposition of emplaced wastes, which is atypical in composition—which has to be collected and combusted.

3. The Agency is an administrative agency created by statute. See 415 ILCS 5/4 (a).

The Agency's ACT Decision

4. This case has its roots in (a) certain characteristics of the Congress landfill that result in the production of gas that displays temperatures, pressures and chemical composition that are not typical of a gas generated by a municipal solid waste landfill, and (b) certain provisions contained in the Final Consent Decree in *People v. Congress Development Company*, *supra*, and the documents that Congress prepared in compliance with those provisions.

5. The Congress landfill contains an area of waste, deep within one portion of the facility, that is hotter and under greater pressure than is typical in landfills (and that is even different from the characteristics of other areas of the Congress landfill itself). This characteristic of the Congress landfill has been the subject of literally dozens of meetings among Congress, the Agency, and the Illinois Attorney General's office since 2007.

6. During the pendency of *People v. Congress Development Company*, and pursuant to an interlocutory injunction that the Court entered, Congress prepared a study (the "Expanded Heat and Pressure Study") of the area of high temperatures and pressures and submitted it for review to the Agency and the Illinois Attorney General's office. Among other things, the Expanded Heat and Pressure Study concluded that the area of high temperature and pressure, while so deep within the landfill that it does not pose any risk to the integrity of the final cover on the top of the landfill, was likely to continue for the indefinite future. The Expanded Heat and Pressure Study also concluded that the area of high temperature and pressure could be managed through the use of appropriate engineering controls, but that the temperatures and pressures could not be reduced at the source, other than by the passage of time. The Agency has been aware of the Expanded Heat and Pressure Study, and has had multiple copies in its records, since the fall of 2008.

7. In recognition of this phenomenon at the Congress landfill, the Final Consent Decree gave Congress until June 30, 2013 to demonstrate compliance with certain regulations that govern the temperature, pressure, and chemical composition of landfill gas. Specifically, Paragraph I (page 28) set forth a series of deadlines by which Congress was required to meet enumerated requirements at the landfill. Subparagraph 6 required that Congress meet specified regulatory limits on the temperature, pressure, nitrogen and oxygen content of the landfill gas that it collects:

Congress was required to “achieve the following objectives by the deadlines specified below, subject to Section IX of this Consent Order (Enforcement and Modification of the Consent Order); approval of request(s) for modification of the objectives and deadlines will not be unreasonably withheld: *** 6. By June 30, 2013, the Landfill shall be in compliance with the Board Air Pollution Regulations found at 35 Ill. Adm. Code Part 220 and 40 C.F.R. 63, Subpart AAAA.”

8. Part 220 and 40 C.F.R. 63, Subpart AAAA in turn require the owner or operator of a landfill to do either of two things to be in compliance. First, the owner or operator can show that the gas collection wells meet specified limits on temperature, pressure, nitrogen and oxygen: if the gas collection wells meet those limits, or “default values,” the facility is in compliance. Alternatively, the owner or operator “may establish a higher operating temperature, nitrogen, or oxygen value at a particular well.” 35 Ill. Adm. Code 220.250 (c). Given the physical impossibility of meeting the default values, Congress chose to comply by using the latter alternative and made a formal request to the Agency (the “HOV Request”).

9. Well before Congress submitted the HOV Request, IEPA was fully aware that Congress would seek alternate operating parameters, and was aware of the actual characteristics of the gas collectors from the historic data on them. Pursuant to Paragraph V M (page 35) of the

Final Consent Decree, Congress met with the Agency and the Illinois Attorney General's office on a regular basis between August, 2010 and February, 2013. At those meetings Congress regularly apprised both the Agency and the Attorney General's office that the high temperatures, oxygen and pressures at the landfill that were explained and documented in the Expanded Heat and Pressure Study were continuing, and that it therefore would file a request for alternate parameters in February, 2013. Consistent with its statements, and consistent with both the Final Consent Order and 35 Ill. Adm. Code 220.250, Congress submitted the HOV Request (formally, a Request for Alternate Operating Parameters and Procedures for Active Landfill Gas Extraction Collectors) to the Agency on February 28, 2013. Congress also submitted regular reports to the Agency, in which it provided data on the operating characteristics of the gas collectors in question.

10. Congress also prepared a second document in compliance with the Final Consent Decree in *People v. Congress Development Company, supra*, this one a plan for how it would ensure that the facility complied with applicable requirements (the "Landfill Compliance Plan"). Among other things, the Landfill Compliance Plan includes detailed and lengthy standard operating procedures for all of the gas collectors at the facility, and specifically explains how Congress will manage gas collectors that exhibit pressures, oxygen or temperatures in excess of the Part 220 default values. The Agency (and the Attorney General) approved the Landfill Compliance Plan, including the portions addressing high pressures, oxygen and high temperature wells, on June 21, 2011. The Agency has had a copy of the approved Landfill Compliance Plan in its records since 2011.

11. On March 12, 2013, the Agency denied the HOV Request. The stated reason for the denial, in its entirety, was the following: "Circuit Court Order No. 06 CH 1438 requires

Congress [to] be in compliance with 35 Ill. Adm. Code Part 220, and 40 C.F.R. 63, Subpart AAA, by June, 2013. The Illinois EPA cannot grant alternate operating parameters and procedures outside the requirements of these regulations[,] effectively circumventing the Compliance Schedule in this Order. As such the Illinois EPA is denying your request.”

12. The Agency’s rationale for denying the HOV Request was erroneous as a matter of law (because it utterly misconstrued the requirement in the Circuit Court Consent Order), but because the Agency agreed to issue HOVs for the gas collectors—albeit with limits more stringent than those that Congress had requested—it was not necessary to litigate PCB No. 13-57 to a final, contested resolution.

13. Shortly after the Agency issued those HOVs, several of the gas collectors exhibited sporadic operating characteristics outside of the limits the Agency had granted. Congress therefore began to submit the ACT Requests, ultimately submitting 10 such requests. (Copies of the ACT Requests are attached hereto as Exhibits B-K). The Agency ultimately issued the blanket Denial on September 12, 2013, and notified Congress that it would not entertain any further requests for alternative compliance timelines, regardless of individual merit, need or technical justification.

14. The Agency’s Denial of the ACT Request is arbitrary, capricious, and otherwise unlawful for at least the following reasons:

a. Given the existing conditions at the Congress landfill, at this time it is physically impossible for the facility to comply with the HOVs the Agency issued. The only way that Congress could ensure that the gas collectors at issue could meet the Agency’s HOVs at this time would be to shut them off, and to stop collecting landfill gas in the area of the landfill that exhibits high pressures,

oxygen and temperatures.

b. But other applicable laws, including (although not limited to) the general air pollution prohibition of the Illinois Environmental Protection Act, 415 ILCS 5/9(a), require that Congress continue to collect the landfill gas.

c. The Agency's statement, in the Decision letter, that Congress had not presented any corrective actions with respect to the high temperature and high pressure gas collectors, completely and arbitrarily ignored the corrective actions contained in the Landfill Compliance Plan.

WHEREFORE, Congress Development Company asks the Board to reverse IEPA's September 12, 2013 Denial of the ACT Request, to remand the matter back to IEPA for proper consideration in light of the information already in the Agency's records, and to grant such further relief as the law and the facts justify.

Respectfully submitted,

CONGRESS DEVELOPMENT COMPANY

By: 
One of Its attorneys

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155 N. Wacker Drive
Suite 3050
Chicago, Illinois 60606
Phone: (312) 920-3300
Fax: (312) 920-3301


Firm ID: 46500

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 16th day of October, 2013, a true and correct copy PETITION FOR REVIEW OF DENIAL OF REQUEST FOR ALTERNATIVE COMPLIANCE TIMELINES was served by electronic mail and United States mail on the following:

John Therriault
Assistant Clerk
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, IL 60601

Division of Legal Counsel
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Springfield, IL 62794-9276

By: 
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217)782-2829

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

CERTIFIED MAIL #7009 3410 0002 3750 2456
RETURN RECEIPT REQUESTED

SEP 12 2013

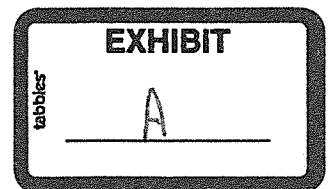
Tamara Sands
Project Manager
Cornerstone Environmental Group, LLC
400 Quadrangle Drive, Suite E
Bolingbrook, Illinois 60440

**RE: Congress Development Company – Hillside Landfill
I.D. 031123ABP
Requests for Alternative Compliance Timelines**

Dear Ms. Sands:

The Illinois Environmental Protection Agency (“Illinois EPA”) received your letters dated July 17, July 22, July 29, August 8, August 14, August 23, and September 5 2013, submitted on behalf of Congress Development Company – Hillside Landfill (“Congress”), requesting alternative compliance timelines for multiple gas extraction collectors (“collectors”) that have exhibited elevated temperatures and oxygen levels.

Congress states in its requests the cause for these exceedances is due to an abiotic exothermic process within the permitted waste boundaries of the landfill resulting in elevated oxygen concentration, production of liquids and hydrogen, and high temperatures. Further, Congress states that the nature of the abiotic exothermic process is such that methane concentrations in the collectors do not exhibit typical responses to corrective measures such as changes in vacuum or increases or decreases in temperatures, and that additionally, changes in temperature and oxygen concentrations are typically independent of any corrective measures applied and are a product of the abiotic exothermic process. Beyond continuing to tune the collectors and allowing time for the process to stabilize, your requests do not present any corrective actions to be completed within the 120 days set forth as the requested alternative compliance timelines. As such, the Illinois EPA is denying your requests.



4302 N. Main St., Rockford, IL 61103 (815) 987-7760
595 S. State, Elgin, IL 60123 (847) 608-3131
2125 S. First St., Champaign, IL 61820 (217) 278-5800
2009 Mall St., Collinsville, IL 62234 (618) 346-5120

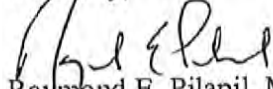
9511 Harrison St., Des Plaines, IL 60016 (847) 294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309) 693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618) 993-7200
100 W. Randolph, Suite 10-300, Chicago, IL 60601 (312) 814-6026

Congress Development Company – Hillside Landfill
I.D. 031123ABP
Requests for Alternative Compliance Timelines
Page 2

The collectors should be returned to compliance, repaired or replaced, or the well field expanded as necessary within 120 days from the initial exceedances. Alternatively, Congress may seek higher operating values for these collectors in accordance with 35 Ill. Adm. Code 220.250(c). Any request for a higher operating values must provide a demonstration that provides supporting data to show that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methagens, and shall provide a minimum of six months of collector monitoring data including pressure, temperature, oxygen, methane, and carbon monoxide.

Questions regarding this matter should be directed to Yasmine Keppner-Bauman of my staff at 217/524-0908.

Sincerely,



Raymond E. Pilapil, Manager
Compliance Section
Bureau of Air

REP: ykb



CORNERSTONE
Environmental Group, LLC

400 Quadrangle Drive, Suite E • Bolingbrook, IL 60440 • (630) 633-5520 • Fax: (630) 378-2640

UPS TRACKING #: 1Z 13Y 28X NT 9716 4660

July 17, 2013

Raymond Pilapil
Illinois Environmental Protection Agency
Bureau of Air, Compliance Section
1021 North Grand Avenue
P.O. Box 19276
Chicago, Illinois 62794-9276

Re: Congress Development Company - Hillside Landfill
Facility ID No. 031123ABP
Title V – CAAPP Permit No. 95090247
Request for Alternative Compliance Timeline (ACT):
Gas Extraction Collectors: RW19, RW56, RW66, RW09, RW50, GW01, PHR18,
and PHR19
Project Number 130028-009

Dear Mr. Pilapil:

Cornerstone Environmental Group, LLC., on behalf of Congress Development Company (Congress) – Hillside Landfill respectfully submits this request for an ACT in accordance with 40 Code of Federal Regulations (CFR) 60.755(a)(3).

35 IAC 220.240(a)(5) requires *“the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in §60.753 (c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.”*

BACKGROUND

Per the facility's Title V Clean Air Act Program Permit (CAAPP) condition 7.1.3.c, *“the affected landfill is subject to 35 IAC Part 220, Non-methane Organic Compounds, because construction or modification of the affected landfill commenced before May 30, 1991, and has accepted waste since November 8, 1987, pursuant to 35 IAC 220.200(a).”* Additionally, the facility completed certified closure approved by Illinois Environmental Protection Agency's (IEPA), Bureau of Land (BOL) on December 31, 2008.



Specifically:

35 IAC 220.250(b) requires the facility to *“operate each interior wellhead in the collection system with negative pressure at each wellhead except under the following conditions:*

- 1) A fire or increased well temperature. The owner or operator shall record instances when positive pressure occurs in efforts to avoid a fire. These records shall be submitted with the annual reports as provided in Section 220.280(e)(1) of this Subpart;*
- 2) Use of a geomembrane or synthetic cover. The owner or operator shall develop pressure limits associates with such a cover that must be approved by the Agency;*
- 3) A decommissioned well. A well may experience a static positive pressure after shut down to accommodate for declining flows. All design changes shall be approved by the Agency;”*

Per the Compliance Schedule set forth in Section V, item 6, of the previously referenced Final Consent Order 06 CH 1438, Congress is required to achieve compliance with and maintain the collectors within the facility’s GCCS in accordance with the operational standards contained in the above referenced sections of 35 IAC 220, specifically, subparts 240 and 250, by no later than June 30, 2013. 35 IAC 220.250 requires the facility to operate the wells within the facility’s GCCS in accordance with the operational standards identified in this Subpart.

The cause of these exceedances is due to an abiotic exothermic process within the permitted waste boundaries of the landfill. The by-products of this process include elevated oxygen concentrations, the production of liquids and hydrogen, with associated high positive pressures and high temperatures. Due to the nature of the abiotic exothermic process, the methane concentrations in these wells do not exhibit expected typical responses to corrective measures such as changes in applied vacuum or decreases/increases in temperature. Additionally, changes in temperatures and/or oxygen concentrations in these wells are independent of any corrective measures applied and are a byproduct solely of the abiotic exothermic process.

As a result of this process, Congress observed and recorded significant volumes of fluid, elevated temperatures and high pressures at individual wellheads on the interior LFG extraction wells installed within the permitted waste boundaries of the landfill.

During the July 2nd and 3rd, 2013, monitoring events, eight (8) wells experienced oxygen concentrations greater than regulatory thresholds for oxygen and/or approved higher operating value (HOV) alternatives. Some of these wells have pumps, which allow field personnel to control liquid levels within the well.

Due to the volume of liquid generated by the exothermic process, the wells often experience high oxygen concentrations. Wells with pumps installed experience these intermittent elevations in oxygen until the liquid levels recede, thus reducing the oxygen concentration in the collectors. The table below lists wells exhibiting the exceedances, along with approved higher operating value as indicated, and the presence of a pump in the collector.

Well ID	Location	Parameter Exceeded	HOV	Initial Date of Exceedance	Pump
RW19	East 2/3	Oxygen	No	2-Jul-13	Y
RW34	East 2/3	Oxygen	No	14-Jul-13	N
RW56	East 2/3	Oxygen	No	3-Jul-13	Y
RW66	East 2/3	Oxygen	No	2-Jul-13	N
RW09	East 2/3	Oxygen	Yes 20% O2	2-Jul-13	N
RW50	East 2/3	Oxygen	Yes 15% O2	2-Jul-13	N
GW01	East 2/3	Oxygen	Yes 10% O2	2-Jul-13	Y
PHR18	East 2/3	Oxygen	Yes 10% O2	2-Jul-13	N
PHR19	East 2/3	Oxygen	Yes 10% O2	3-Jul-13	N

Raymond Pilapil
July 17, 2013
Page 4

SUMMARY

Congress understands the intent of 35 IAC 220.250(b) is to reduce the potential for a subsurface oxidation event. However, due to the nature of the abiotic exothermic process, and the requirements of the compliance requirements in Final Consent Order 06 CH 1438, Congress must maintain active extraction on wells to mitigate the reaction generated positive pressure, oversaturation of the LFG, as well as, reduce the potential for and to control odors.

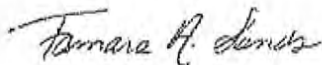
Based on the data evaluations completed as part of this submittal, in accordance with 35 IAC 220.250(c), Congress respectfully requests one-hundred and twenty (120) days from the date of the initial exceedance to allow for pumps to be enabled and the well field to balance. The table below lists the one-hundred and twenty (120) day deadline requested for each well.

Well ID	Location	Initial Date of Exceedance	120-Day Date
RW19	East 2/3	2-Jul-13	30-Oct-13
RW56	East 2/3	3-Jul-13	31-Oct-13
RW66	East 2/3	2-Jul-13	30-Oct-13
RW09	East 2/3	2-Jul-13	30-Oct-13
RW50	East 2/3	2-Jul-13	30-Oct-13
GW01	East 2/3	2-Jul-13	30-Oct-13
PHR18	East 2/3	2-Jul-13	30-Oct-13
PHR19	East 2/3	3-Jul-13	31-Oct-13

If you have any questions, please contact Mr. Josh McGarry at (708) 544-5195 or me at (630) 633-5827.

Sincerely,

Cornerstone Environmental Group, LLC



Tamara Sands
Project Manager

Raymond Pilapil
July 17, 2013
Page 5

Attachment A

cc: Yasmine Keppner-Bauman – IEPA-BOA – Compliance Section
IEPA-BOA – Collinsville Regional Office

Josh McGarry, Congress
Steve Smith, Republic – electronic copy only
Niki Wuestenberg, Republic – electronic copy only
Cornerstone Project Binder

ATTACHMENT A

Congress Development Company
Hillsdale, IL

Exceedance Report for Oxygen ≤ 5%, Pressure ≥ 0, & Temperature ≥ 111°F
JULY 2013 - DECEMBER 2013
EASTERN Z/A WELLS

Well ID	Date	Time	CH ₄ (%)	CO ₂ (%)	O ₂ (%)	Moisture (%)	Initial Static Press. (H ₂ O)	Adjusted Static Press. (H ₂ O)	Initial Temp. (°F)	Adjusted Temp. (°F)	Adjusted Flow (ccfm)	Diff. Press. (in. H ₂ O)	Baro. Press. (in. H ₂ O)	System Pressure (in. H ₂ O)	Static Press. At Flame	System Press. % of Face Vacuum	Comments
CD06RW19	02-10-13	11:28:00	38.2	34.3	5.7	21.5	-6.6	-6.6	3.8	70	0	0.004	29.31	-31.04	-43.25	70.69%	Initial Reading: --- Second Reading: Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06RW19	02-10-13	11:51:00	35.3	31.7	6.8	26.2	-6.6	-6.6	3.9	70	0	0	29.51	-31.21	-43.25	71.84%	Initial Reading: --- Second Reading: Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06RW56	03-10-13	0:53:00	0.8	31.7	12.9	54.6	-5.8	-5.8	4.2	80	10	0.004	29.27	-31.21	-43.575	71.62%	Initial Reading: --- Second Reading: No Flow Device, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06RW56	03-10-13	0:55:00	0.7	21.1	15.5	62.7	-5.8	-5.8	4.0	80	6	0.012	29.33	-30.71	-43.513	70.48%	Initial Reading: --- Second Reading: No Flow Device, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06RW56	16-10-13	12:33:00	0	25.5	12.2	63.3	-5.4	-5.4	5.1	100	7	0.017	29.48	-32.31	-43.35	74.53%	Initial Reading: --- Second Reading: No Flow Device, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06RW56	16-10-13	12:35:00	0	20.8	15.4	73.8	-3.3	-3.3	4.8	100	5	0.008	29.48	-32.5	-43.35	74.97%	Initial Reading: --- Second Reading: No Flow Device, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06RW66	02-10-13	10:15:00	32.3	32.7	6.2	26.5	-9.8	-9.8	4.6	115	39	0.415	29.29	-34.31	-43.25	78.42%	Initial Reading: --- Second Reading: Leaking Wellhead, Valve Barely Open, No Change.
CD06RW66	02-10-13	10:18:00	32	32.5	6.2	27.5	-9.8	-9.8	4.8	115	37	0.365	29.29	-34.16	-43.25	78.96%	Initial Reading: --- Second Reading: Leaking Wellhead, Valve Barely Open, No Change.
CD06RW09	02-10-13	10:23:00	0	0.6	21.2	78.2	-6.8	-6.8	3.7	70	10	0.027	29.33	-31.83	-43.25	72.71%	Initial Reading: --- Second Reading: Leaking Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06RW09	02-10-13	10:15:00	0	0.2	21.4	78.4	-6.7	-6.7	3.7	70	13	0.047	29.33	-31.2	-43.25	71.31%	Initial Reading: --- Second Reading: Leaking Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06RW50	02-10-13	14:02:00	8.7	12.1	16.4	62.8	-32.2	-32.2	3.8	70	11	0.034	29.27	-31.98	-43.25	73.10%	Initial Reading: --- Second Reading: Leaking Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06RW50	02-10-13	14:05:00	0.1	13.1	1.6	61.8	-31.6	-31.6	3.9	70	11	0.034	29.27	-31.65	-43.25	72.34%	Initial Reading: --- Second Reading: Leaking Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06RW01	02-10-13	6:36:00	5	3.3	19.6	72.1	-6.4	-6.4	3.7	70	<<>>	-0.024	29.33	39.66	-43.15	67.29%	Initial Reading: --- Second Reading: Leaking Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06RW01	02-10-13	6:38:00	5.7	3.5	19.6	71.3	-6.2	-6.2	3.6	70	<<>>	-0.028	29.33	39.86	-43.15	68.18%	Initial Reading: --- Second Reading: Leaking Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06RW01	14-10-13	8:51:00	4.8	2.2	18.5	74.5	-3.8	-3.8	4.0	88	0	0.002	29.45	-29.05	-43.05	68.10%	Initial Reading: --- Second Reading: Leaking Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06RW01	14-10-13	8:53:00	4.1	2.1	18.7	75.1	-3.8	-3.8	4.0	88	1	0.008	29.45	-29.16	-43.25	68.35%	Initial Reading: --- Second Reading: Leaking Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06FH16	02-10-13	8:57:00	3.1	2.3	20.6	76.1	-8.6	-8.6	3.7	66	2	0.006	29.3	-32.08	-43.25	73.34%	Initial Reading: --- Second Reading: Office Floor, Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06FH16	02-10-13	8:59:00	0	0.1	21.6	78	-8.6	-8.6	3.6	66	0	0	29.3	-32.03	-43.25	73.21%	Initial Reading: --- Second Reading: Office Floor, Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06FH18	14-10-13	10:16:00	2	2.7	18.4	76.9	-7.2	-7.2	4.2	90	5	0.04	29.41	-31.5	-43.25	71.07%	Initial Reading: --- Second Reading: Office Floor, Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06FH18	14-10-13	10:18:00	0.2	0.4	19.5	79.6	-7.2	-7.2	4.0	90	5	0.036	29.41	-31.37	-43.25	71.83%	Initial Reading: --- Second Reading: Office Floor, Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates.
CD06FH19	05-10-13	10:21:00	0.1	2.8	18.9	78.2	-7.3	-7.3	4.1	45	2	0.005	29.26	-32.36	-43.575	74.29%	Initial Reading: --- Second Reading: Office Floor, Wellhead, Valve Barely Open, No Change.
CD06FH19	05-10-13	10:24:00	0	0.4	19.7	79.9	-7.3	-7.3	4.1	45	2	0.007	29.26	-32.31	-43.575	74.19%	Initial Reading: --- Second Reading: Office Floor, Wellhead, Valve Barely Open, No Change.
CD06FH19	16-10-13	11:37:00	0.2	0.4	19.3	80.1	-7	-7	4.2	58	2	0.031	29.59	-32.17	-43.35	74.21%	Initial Reading: --- Second Reading: Office Floor, Wellhead, Valve Barely Open, No Change.
CD06FH19	16-10-13	11:40:00	0.2	0.3	19.3	80.3	-7	-7	4.2	58	8	0.078	29.49	-32.21	-43.35	74.30%	Initial Reading: --- Second Reading: Office Floor, Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates.

UPS Internet Shipping: View/Print Label

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. Fold the printed sheet containing the label at the line so that the entire shipping label is visible. Place the label on a single side of the package and cover it completely with clear plastic shipping tape. Do not cover any seams or closures on the package with the label. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. **GETTING YOUR SHIPMENT TO UPS**
 UPS locations include the UPS Store®, UPS drop boxes, UPS customer centers, authorized retail outlets and UPS drivers.
 Schedule a same day or future day Pickup to have a UPS driver pickup all of your Internet Shipping packages.
 Hand the package to any UPS driver in your area.
 Take your package to any location of The UPS Store®, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the 'Find Locations' Quick link at ups.com.

Customers with a Daily Pickup
 Your driver will pickup your shipment(s) as usual.

FOLD HERE

<p>SARAH BROWN 630-410-7926 CORNERSTONE ENVIRONMENTAL GROU 10012 INTERNATIONAL BOULEVARD CINCINNATI OH 45246</p> <p>SHIP TO: MR. RAYMOND PILAPIL 217-782-2113 IL ENVIRONMENTAL PROTECTION AGENCY 1021 NORTH GRAND AVENUE EAST COMPLIANCE SECTION BUREAU OF AIR SPRINGFIELD IL 62702-4059</p>	<p>0.0 LBS LTR 1 OF 1</p> <p>IL 627 0-01</p> 	<p>UPS NEXT DAY AIR</p> <p>TRACKING #: 1Z 13Y 28X NT 9716 4660</p> <p>1</p> 	<p>BILLING: P/P ATTENTION UPS DRIVER: SHIPPER RELEASE</p> <p>Reference#1: 130028-017</p> <p>UPS 15.5.24. WNT090 36.0A 07/2013</p> 
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UPS Internet Shipping: View/Print Label

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
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UPS locations include the UPS Store®, UPS drop boxes, UPS customer centers, authorized retail outlets and UPS drivers.

Schedule a same day or future day Pickup to have a UPS driver pickup all of your Internet Shipping packages.




Hand the package to any UPS driver in your area.

Take your package to any location of The UPS Store®, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the 'Find Locations' Quick link at ups.com.

Customers with a Daily Pickup

Your driver will pickup your shipment(s) as usual.

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<p>SARAH BROWN 630-410-7226 CORNERSTONE ENVIRONMENTAL GROU 10012 INTERNATIONAL BOULEVARD CINCINNATI OH 45246</p> <p>SHIP TO: MS. YASMINE KEPPNER 217-782-2113 IL ENVIRONMENTAL PROTECTION AGENCY 1021 NORTH GRAND AVENUE EAST COMPLIANCE SECTION (MC 40) BUREAU OF AIR SPRINGFIELD IL 62702-4059</p>	<p>0.0 LBS LTR 1 OF 1</p> <p>IL 627 0-01</p> 	<p>UPS NEXT DAY AIR</p> <p>TRACKING #: 1Z 13Y 28X NT 9791 5278</p> <p>1</p> 	<p>BILLING: P/P ATTENTION UPS DRIVER: SHIPPER RELEASE</p> <p>Reference#1: 130028-017</p> <p>UPS 15.5.24. W00TE00 36.0A 01/2013</p> 
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UPS Internet Shipping: View/Print Label

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. Fold the printed sheet containing the label at the line so that the entire shipping label is visible. Place the label on a single side of the package and cover it completely with clear plastic shipping tape. Do not cover any seams or closures on the package with the label. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
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 Take your package to any location of The UPS Store®, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the 'Find Locations' Quick link at ups.com.

Customers with a Daily Pickup
 Your driver will pickup your shipment(s) as usual.

FOLD HERE

<p>SARAH BROWN 630-410-7226 CORNERSTONE ENVIRONMENTAL GROU 10612 INTERNATIONAL BOULEVARD CINCINNATI OH 45246</p> <p>SHIP TO: DIVISION OF AIR POLLUTION CTRL. 217-782-2113 IEPA 2009 MALL STREET COLLINSVILLE IL 62234-1832</p>	<p>0.0 LBS LTR 1 OF 1</p> <p>IL 620 0-11</p> 	<p>UPS NEXT DAY AIR</p> <p>TRACKING #: 1Z 13Y 28X NT 9894 6484</p> <p>1</p> 	<p>BILLING: P/P ATTENTION UPS DRIVER: SHIPPER RELEASE</p> <p>Reference#1: 130028-017</p> <p>US 15.5.24 WYR299 26.0A 01/2013</p> 
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CORNERSTONE

Environmental Group, LLC

400 Quadrangle Drive, Suite E • Bolingbrook, IL 60440 • (630) 633-5520 • Fax: (630) 378-2640

UPS TRACKING #: 1Z 26X A15 01 7496 5307

July 22, 2013

Raymond Pilapil
Illinois Environmental Protection Agency
Bureau of Air, Compliance Section
1021 North Grand Avenue
P.O. Box 19276
Chicago, Illinois 62794-9276

Re: Congress Development Company - Hillside Landfill
Facility ID No. 031123ABP
Title V – CAAPP Permit No. 95090247
Request for Alternative Compliance Timeline (ACT):
Gas Extraction Collectors: WN106, WN107, WW204, WS203, WW104, WW105,
WS105, WS108, GW74, GW107, GW122, RW92, RW93, RW94, WE103, RW77,
RW76, RW89, RW104, RW84, and GW99
Project Number 130028-009

Dear Mr. Pilapil:

Cornerstone Environmental Group, LLC., on behalf of Congress Development Company (Congress) – Hillside Landfill respectfully submits this request for an ACT in accordance with 40 Code of Federal Regulations (CFR) 60.755(a)(3).

35 IAC 220.240(a)(5) requires *“the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in §60.753 (c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.”*

BACKGROUND

Per the facility’s Title V Clean Air Act Program Permit (CAAPP) condition 7.1.3.c, *“the affected landfill is subject to 35 IAC Part 220, Non-methane Organic Compounds, because construction or modification of the affected landfill commenced before May 30, 1991, and has accepted waste since November 8, 1987, pursuant to 35 IAC 220.200(a).”* Additionally, the facility completed certified closure approved by Illinois Environmental Protection Agency’s (IEPA), Bureau of Land (BOL) on December 31, 2008.



Specifically:

35 IAC 220.250(b) requires the facility to *“operate each interior wellhead in the collection system with negative pressure at each wellhead except under the following conditions:*

- 1) A fire or increased well temperature. The owner or operator shall record instances when positive pressure occurs in efforts to avoid a fire. These records shall be submitted with the annual reports as provided in Section 220.280(e)(1) of this Subpart;*
- 2) Use of a geomembrane or synthetic cover. The owner or operator shall develop pressure limits associates with such a cover that must be approved by the Agency;*
- 3) A decommissioned well. A well may experience a static positive pressure after shut down to accommodate for declining flows. All design changes shall be approved by the Agency;”*

Per the Compliance Schedule set forth in Section V, item 6, of the previously referenced Final Consent Order 06 CH 1438, Congress is required to achieve compliance with and maintain the collectors within the facility's GCCS in accordance with the operational standards contained in the above referenced sections of 35 IAC 220, specifically, subparts 240 and 250, by no later than June 30, 2013. 35 IAC 220.250 requires the facility to operate the wells within the facility's GCCS in accordance with the operational standards identified in this Subpart.

The cause of exceedances is due to an abiotic exothermic process within the permitted waste boundaries of the landfill. The by-products of this process include elevated oxygen concentrations, the production of liquids and hydrogen, with associated high positive pressures and high temperatures. Due to the nature of the abiotic exothermic process, the methane concentrations in these wells do not exhibit expected typical responses to corrective measures such as changes in applied vacuum or decreases/increases in temperature. Additionally, changes in temperatures and/or oxygen concentrations in these wells are independent of any corrective measures applied and are a byproduct solely of the abiotic exothermic process.

As a result of this process, Congress observed and recorded significant volumes of fluid, elevated temperatures and high pressures at individual wellheads on the interior LFG extraction wells installed within the permitted waste boundaries of the landfill.

During the July 7th, 8th, 9th, 10th, and 11th, 2013, monitoring events, fourteen (14) wells experienced oxygen concentrations and seven (7) wells experienced elevated temperature readings greater than regulatory thresholds for oxygen and temperature and/or approved higher operating value (HOV) alternatives. Some of these wells have pumps, which allow field personnel to control liquid levels within the well.

Due to the volume of liquid generated by the exothermic process, the wells often experience high oxygen and temperature concentrations. Wells with pumps installed experience these intermittent exceedances until the liquid levels recede, thus reducing the oxygen concentration and temperature in the collectors. The table below lists wells exhibiting the exceedances, along with those that have approved higher operating value as indicated, and if there is a pump in the collector.

Well ID	Location	Parameter Exceeded	HOV	Initial Date of Exceedance	15-Day Deadline	Pump
WN106	West	Oxygen	20%	7-Jul-13	22-Jul-13	N
WN107	West	Oxygen	10%	7-Jul-13	22-Jul-13	N
WW204	West	Oxygen	21%	8-Jul-13	23-Jul-13	N
WS203	West	Oxygen	20%	8-Jul-13	23-Jul-13	N
WW104	West	Oxygen	20%	8-Jul-13	23-Jul-13	N
WW105	West	Oxygen	20%	8-Jul-13	23-Jul-13	N
WS105	West	Oxygen	10%	8-Jul-13	23-Jul-13	N
WS108	West	Oxygen	10%	8-Jul-13	23-Jul-13	N
GW74	West	Temperature	180°F	9-Jul-13	24-Jul-13	Y
GW107	West	Temperature	184°F	9-Jul-13	24-Jul-13	Y
GW122	West	Temperature	170°F	9-Jul-13	24-Jul-13	Y
RW92	West	Oxygen	15%	9-Jul-13	24-Jul-13	N
RW93	West	Temperature	184°F/100"	9-Jul-13	24-Jul-13	N
RW94	West	Temperature	15%	9-Jul-13	24-Jul-13	Y
WE103	West	Oxygen	NONE	9-Jul-13	24-Jul-13	N
RW104	West	Oxygen	170°F	9-Jul-13	24-Jul-13	N
RW77	West	Oxygen	15%	10-Jul-13	25-Jul-13	Y
RW76	West	Temperature	NONE	10-Jul-13	25-Jul-13	Y
RW89	West	Temperature	O ₂ AT 15%	10-Jul-13	25-Jul-13	Y
RW84	West	Oxygen	10%	11-Jul-13	26-Jul-13	N
GW99	West	Oxygen	20%	11-Jul-13	26-Jul-13	N

SUMMARY

Congress understands the intent of 35 IAC 220.250(b) is to reduce the potential for a subsurface oxidation event. However, due to the nature of the abiotic exothermic process, and the requirements of the compliance requirements in Final Consent Order 06 CH 1438, Congress must maintain active extraction on wells to mitigate the reaction generated positive pressure, oversaturation of the LFG, as well as, reduce the potential for and to control odors.

Based on the data evaluations completed as part of this submittal, in accordance with 35 IAC 220.250(c), Congress respectfully requests one-hundred and twenty (120) days from the date of the initial exceedance to allow for the installation of pumps in collectors that do not have pumps installed and allow sufficient time for pumps already installed to be effective and the well field to balance. The table below lists the one-hundred and twenty (120) day deadline requested for each well.

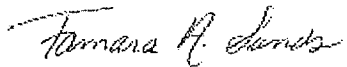
Well ID	Location	Initial Date of Exceedance	120-Day Date
WN106	West	7-Jul-13	4-Nov-13
WN107	West	7-Jul-13	4-Nov-13
WW204	West	8-Jul-13	5-Nov-13
WS203	West	8-Jul-13	5-Nov-13
WW104	West	8-Jul-13	5-Nov-13
WW105	West	8-Jul-13	5-Nov-13
WS105	West	8-Jul-13	5-Nov-13
WS108	West	8-Jul-13	5-Nov-13
GW74	West	9-Jul-13	6-Nov-13
GW107	West	9-Jul-13	6-Nov-13
GW122	West	9-Jul-13	6-Nov-13
RW92	West	9-Jul-13	6-Nov-13
RW93	West	9-Jul-13	6-Nov-13
RW94	West	9-Jul-13	6-Nov-13
WE103	West	9-Jul-13	6-Nov-13
RW104	West	9-Jul-13	6-Nov-13
RW77	West	10-Jul-13	7-Nov-13
RW76	West	10-Jul-13	7-Nov-13
RW89	West	10-Jul-13	7-Nov-13
RW84	West	11-Jul-13	8-Nov-13
GW99	West	11-Jul-13	8-Nov-13

Raymond Pilapil
July 22, 2013
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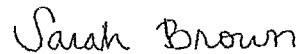
If you have any questions, please contact Mr. Josh McGarry at (708) 544-5195 or me at (630) 633-5827.

Sincerely,

Cornerstone Environmental Group, LLC



Tamara Sands
Project Manager



Sarah Brown
Project Scientist

Attachment A

cc: Yasmine Keppner-Bauman – IEPA-BOA – Compliance Section
IEPA-BOA – Collinsville Regional Office

Josh McGarry, Congress
Steve Smith, Republic – electronic copy only
Niki Wuestenberg, Republic – electronic copy only
Cornerstone Project Binder

Raymond Pilapil
July 22, 2013
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ATTACHMENT A

JULY 2013
WESTERN 1/3 WELLS

Well ID	Date	Time	CH ₄ (%)	CO ₂ (%)	O ₂ (%)	Balance (%)	Initial Static Press. (H ₂ O)	Adjusted Static Press. (in. H ₂ O)	Initial Temp. (°F)	Adjusted Temp. (°F)	Comments
CD00RW76	10-Jul-13	14:23:00	20.9	38.4	8.6	32.1	-31.1	-31.1	120	120	Initial Reading...
CD00RW76	10-Jul-13	14:25:00	24.3	40.2	8.1	27.4	-31.3	-31.3	120	120	Second Reading, Landtec Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates...
CD0WE103	09-Jul-13	8:46:00	0.1	0.2	19.5	80.2	-4.4	-4.7	90	90	Initial Reading...
CD0WE103	09-Jul-13	8:48:00	0	0.1	19.6	80.3	-6	-6	90	90	Second Reading, Landtec Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates...
CD0GW122	09-Jul-13	7:20:00			NM		-27.8		180		
CD0RW104	09-Jul-13				NM		-26.8		180		
CD00RW92	09-Jul-13	13:56:00	0.1	9	16.9	74	-31.3	-31.3	90	90	Initial Reading, Valve 100% Open...
CD00RW92	09-Jul-13	13:59:00	0.2	11.8	16	72	-31.2	-31.1	90	90	Second Reading, Orifice Plate Wellhead, Valve 78% Open, No Change, Available Vacuum Fluctuates...
CD00GW74	09-Jul-13				NM		-27.9		190		
CD00RW84	11-Jul-13	8:42:00	0	35	11.8	53.2	-32.8	-32.9	90	90	Initial Reading...
CD00RW84	11-Jul-13	8:45:00	0	39.8	10.6	49.6	-32.2	-32.4	90	90	Second Reading, Orifice Plate Wellhead, Valve 100% Open, No Change, Available Vacuum Fluctuates...
CD0GW107	09-Jul-13	15:06:00			NM		-30.2		200		
CD00RW93	09-Jul-13	11:52			NM		-28.1		190		
CD00W204	08-Jul-13	13:22:00	0.2	0.4	21	78.4	-4.1	-4	80	80	Initial Reading
CD00W204	08-Jul-13	13:26:00	0.1	0.2	21.1	78.6	-1.4	-1.4	80	80	Second Reading, Landtec Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates
CD00GW99	11-Jul-13	9:01:00	1.5	5.7	20	73	-24.4	-22.4	94	94	Initial Reading...
CD00GW99	11-Jul-13	9:05:00	1.3	2.6	20.9	75.2	-24.9	-25.2	94	94	Second Reading, Orifice Plate Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates...
CD00VN106	07-Jul-13	10:58:00	0.2	0	20.7	79.1	-7.6	-7.6	98	98	Initial Reading...
CD00VN106	07-Jul-13	11:01:00	0.1	0	20.7	79.2	-7.6	-7.6	98	98	Second Reading, Orifice Plate Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates...

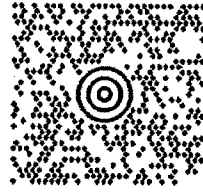
JULY 2013

WESTERN 1/3 WELLS

Well ID	Date	Time	CH ₄ (%)	CO ₂ (%)	O ₂ (%)	Balance (%)	Initial Static Press. (H ₂ O)	Adjusted Static Press. (in. H ₂ O)	Initial Temp. (°F)	Adjusted Temp. (°F)	Comments
CD00WS203	08-Jul-13	15:04:00	0.2	4.6	19.4	75.8	-21.6	-21.5	90	90	Initial Reading
CD00WS203	08-Jul-13	15:05:00	0	0.7	20.6	78.7	-21.4	-21.4	90	90	Second Reading; Landtec Wellhead; Valve Barely Open; No Change; Available Vacuum Fluctuates
CD00WW104	08-Jul-13	13:17:00	0.1	0.2	21	78.7	-31.7	-31.6	80	80	Initial Reading
CD00WW104	08-Jul-13	13:19:00	0.2	0.4	20.8	78.6	-31.7	-31.7	80	80	Second Reading; Landtec Wellhead; Valve Barely Open; No Change; Available Vacuum Fluctuates
CD00WW105	08-Jul-13	13:35:00	0.4	1.1	20.4	78.1	-34.5	-34.6	80	80	Initial Reading
CD00WW105	08-Jul-13	13:37:00	0.4	0.5	20.7	78.4	-34.7	-34.5	80	80	Second Reading; Landtec Wellhead; No Change; Available Vacuum Fluctuates
CD00RW77	10-Jul-13	13:11:00	0.4	13.5	15.5	70.6	-31.2	-31.4	115	115	Initial Reading; ...
CD00RW77	10-Jul-13	13:14:00	0.3	14.1	15.2	70.4	-31.4	-31.4	115	115	Second Reading; Onface Plate Wellhead; Valve Barely Open; No Change ...
CD00RW89	10-Jul-13	14:07:00	1.9	78.2	0.2	19.7	-31.2	-31.2	162	162	Initial Reading; ...
CD00RW89	10-Jul-13	14:10:00	2.1	79.3	0	18.6	-30.8	-30.7	162	162	Second Reading; Onface Plate Wellhead; Valve Barely Open; No Change ...
CD00RW94	09-Jul-13				NM		-28.6		200		
CD00WN107	07-Jul-13	10:51:00	0.1	0	20.8	79.1	-7.6	-7.6	98	98	Initial Reading; ...
CD00WN107	07-Jul-13	10:53:00	0.1	0	20.7	79.2	-7.6	-7.6	98	98	Second Reading; Landtec Wellhead; Valve Barely Open; No Change; Available Vacuum Fluctuates; ...
CD00WS105	08-Jul-13	15:25:00	3.8	6.7	17.1	72.4	-7.5	-7.5	98	98	Initial Reading
CD00WS105	08-Jul-13	15:27:00	0	0.4	20.7	78.9	-7.5	-7.5	98	98	Second Reading; Landtec Wellhead; Valve Barely Open; No Change; Available Vacuum Fluctuates
CD00WS108	08-Jul-13	15:42:00	1.9	1.9	19.6	76.6	-7.4	-7.4	90	90	Initial Reading
CD00WS108	08-Jul-13	15:46:00	1.6	1.2	19.8	77.4	-7.4	-7.4	90	90	Second Reading; Onface Plate Wellhead; Valve Barely Open; No Change; Available Vacuum Fluctuates

FROM:
PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 627 0-01



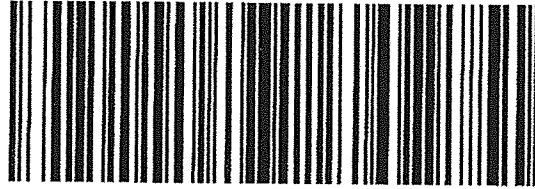
SHIP TO:

RAYMOND PILAPIL, MANAGER
(630) 633-5501
IEPA - BUREAU OF AIR
COMPLIANCE SECTION
1021 NORTH GRAND AVENEU EAST
SPRINGFIELD IL 62794-9276

UPS NEXT DAY AIR

TRACKING #: 1Z 26X A15 01 7496 5307

1



REF 1:130028-017

BILLING: P/P

WS 16.031

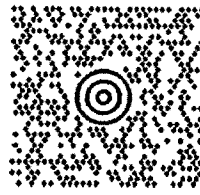
42.0A 07/2013

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FROM:

PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 627 0-01



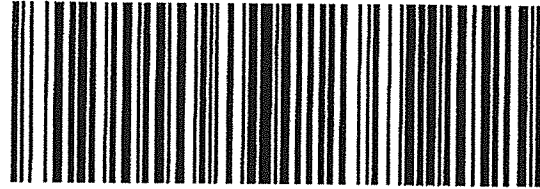
SHIP TO:

YASMINE KEPPNER-BAUMAN
(630) 633-5501
IEPA-BOA - Y. KEPPNER-BAUMAN
COMPLIANCE SECTION
1021 NORTH GRAND AVENUE EAST
SPRINGFIELD IL 62703

UPS NEXT DAY AIR

TRACKING #: 1Z 26X A15 01 7541 2312

1



REF 1:130028.017

BILLING: P/P

WS 16.0.31

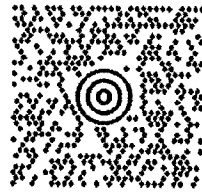
42.0A 07/2013

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FROM:

PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 620 0-11



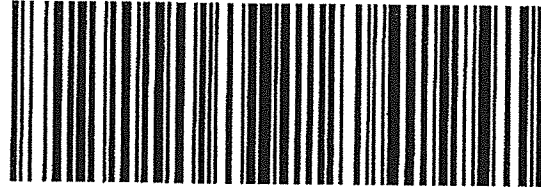
SHIP TO:

REGIONAL OFFICE
(630) 633-5501
IEPA-BOA - COLLINSVILLE, IL
DIVISION OF AIR POLLUTION CONTROL
2009 MALL STREET
COLLINSVILLE IL 62234

UPS NEXT DAY AIR

TRACKING #: 1Z 26X A15 01 7481 2927

1



REF 1:130028.017

BILLING: P/P

WS 16.0.31

42.0A 07/2013

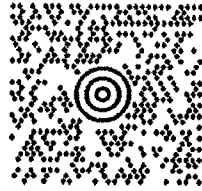
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FROM:

1 LBS

1 OF 1

PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440



IL 601 9-02

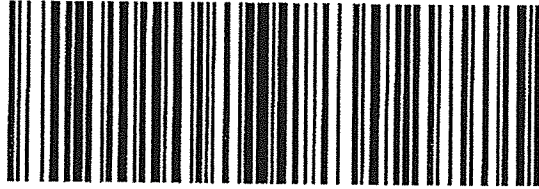


SHIP TO:

JOSHUA MCGARRY
CONGRESS DEVELOP. CO.- HILLSIDE LF
4100 WEST FRONTAGE ROAD
HILLSIDE IL 60162

UPS GROUND

TRACKING #: 1Z 26X A15 03 7326 3135



REF 1:130028.017

BILLING: P/P

WS 16.0.31

42.0A 07/2013

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CORNERSTONE
Environmental Group, LLC

400 Quadrangle Drive, Suite E • Bolingbrook, IL 60440 • (630) 633-5520 • Fax: (630) 378-2640

UPS TRACKING #: 1Z 26X A15 01 7360 6858

July 29, 2013

Raymond Pilapil
Illinois Environmental Protection Agency
Bureau of Air, Compliance Section
1021 North Grand Avenue
P.O. Box 19276
Chicago, Illinois 62794-9276

Re: Congress Development Company - Hillside Landfill
Facility ID No. 031123ABP
Title V – CAAPP Permit No. 95090247
Request for Alternative Compliance Timeline (ACT):
Gas Extraction Collectors: RW34
Project Number 130028-009

Dear Mr. Pilapil:

Cornerstone Environmental Group, LLC., on behalf of Congress Development Company (CDC) – Hillside Landfill respectfully submits this request for an ACT in accordance with 35 Illinois Administrative Code (IAC) Subpart 220.

Specifically, 35 IAC 220.240(a)(5) requires: *“the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in §60.753 (c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.”*

BACKGROUND

Per the facility’s Title V Clean Air Act Program Permit (CAAPP) condition 7.1.3.c, *“the affected landfill is subject to 35 IAC Part 220, Non-methane Organic Compounds, because construction or modification of the affected landfill commenced before May 30, 1991, and has accepted waste since November 8, 1987, pursuant to 35 IAC 220.200(a).”* Additionally, the facility completed certified closure approved by Illinois Environmental Protection Agency’s (IEPA), Bureau of Land (BOL) on December 31, 2008.



Per the Compliance Schedule set forth in Section V, item 6, of the Final Consent Order 06 CH 1438, CDC is required to achieve compliance with and maintain the collectors within the facility's GCCS in accordance with the operational standards contained in the above referenced sections of 35 IAC 220, specifically, subparts 240 and 250, by no later than June 30, 2013.

Specifically, 35 IAC 220.250 requires the facility to "operate each interior wellhead in the collection system with negative pressure at each wellhead except under the following conditions:

- 1) *A fire or increased well temperature. The owner or operator shall record instances when positive pressure occurs in efforts to avoid a fire. These records shall be submitted with the annual reports as provided in Section 220.280(e)(1) of this Subpart;*
- 2) *Use of a geomembrane or synthetic cover. The owner or operator shall develop pressure limits associates with such a cover that must be approved by the Agency;*
- 3) *A decommissioned well. A well may experience a static positive pressure after shut down to accommodate for declining flows. All design changes shall be approved by the Agency;"*

During the July 14th, 2013, monitoring events, one (1) collector, CD00RW34 (RW34), experienced an elevated oxygen concentration greater than 5%. CDC initiated corrective actions, re-monitored the well, but the oxygen concentration remains elevated. Based on historical data, CDC proposes the cause of exceedance is due to an ongoing abiotic exothermic process present within the permitted waste boundaries of the landfill. The by-products of this process include elevated oxygen concentrations, the production of liquids and hydrogen, with associated high positive pressures and high temperatures. Due to the nature of the abiotic exothermic process, the expected typical responses to corrective measures initiated such as changes in applied vacuum or decreases/increases in temperature do not typically occur.

Additionally, changes in temperatures and/or oxygen concentrations in these wells are independent of any corrective measures applied and are a byproduct solely of the abiotic exothermic process. As a result of this process, CDC observed and recorded significant volumes of fluid, elevated temperatures and high pressures at individual wellheads on the interior LFG extraction collectors installed within the permitted waste boundaries of the landfill.

Some of these wells at the facility have pumps, which allow field personnel to control liquid levels within the well. However, well RW34 does not have a pump and therefore field personnel are unable to alleviate the exceedance via manipulating liquid levels. Please see the table below providing an overview of the exceedance at well RW34.

Well ID	Location	Parameter Exceeded	HOV	Initial Date of Exceedance	15-Day Deadline	Pump
RW34	East	Oxygen	NONE	14-Jul-13	29-Jul-13	N

Raymond Pilapil
July 29, 2013
Page 3

SUMMARY

CDC understands the intent of 35 IAC 220.250(b) is to reduce the potential for a subsurface oxidation event. However, due to the nature of the abiotic exothermic process, and the requirements of the compliance requirements in Final Consent Order 06 CH 1438, CDC must maintain active extraction on wells to mitigate the reaction generated positive pressure, oversaturation of the LFG, as well as, reduce the potential for and to control odors.

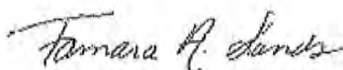
Based on the data evaluations completed as part of this submittal, in accordance with 35 IAC 220.250(c), Congress respectfully requests one-hundred and twenty (120) days from the date of the initial exceedance to allow for the determination if installation of a pump in well RW34 can be completed is effective. The table below lists the one-hundred and twenty (120) day deadline requested for well RW34.

Well ID	Location	Initial Date of Exceedance	120-Day Date
RW34	East	14-Jul-13	11-Nov-13

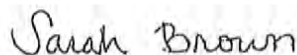
If you have any questions, please contact Mr. Josh McGarry at (708) 544-5195 or me at (630) 633-5827.

Sincerely,

Cornerstone Environmental Group, LLC



Tamara Sands
Project Manager



Sarah Brown
Project Scientist

Attachment A

cc: Yasmine Keppner-Bauman – IEPA-BOA – Compliance Section
IEPA-BOA – Collinsville Regional Office

Josh McGarry, Congress
Steve Smith, Republic – electronic copy only
Niki Wuestenberg, Republic – electronic copy only
Cornerstone Project Binder

Raymond Pilapil
July 29, 2013
Page 4

ATTACHMENT A

Congress Development Company
Hillside, IL

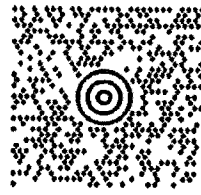
Exceedance Report for Oxygen \geq 5%, Pressure \geq 0, & Temperature \geq 131°F

JULY 2013
EASTERN 2/3 WELLS

Well ID	Date	Time	CH ₄ (%)	CO ₂ (%)	O ₂ (%)	Balance (%)	Initial Static Press. (H ₂ O)	Adjusted Static Press. (in. H ₂ O)	Initial Temp. (°F)	Adjusted Temp. (°F)	Adjusted Flow (scfm)	Comments
CD00RW34	14-Jul-13	10:09:00	39.4	31.8	6.1	22.7	-26.7	-27.1	92	92	<<<>>	Initial Reading ₂₀₁₃
CD00RW34	14-Jul-13	10:11:00	34.3	27	7.5	31.2	-31.4	-31.4	92	92	<<<>>	Second Reading, Landtec Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates ₂₀₁₃
CD00RW34	14-Jul-13	10:09:00	39.4	31.8	6.1	22.7	-26.7	-27.1	92	92	<<<>>	Initial Reading ₂₀₁₃
CD00RW34	14-Jul-13	10:11:00	34.3	27	7.5	31.2	-31.4	-31.4	92	92	<<<>>	Second Reading, Landtec Wellhead, Valve Barely Open, No Change, Available Vacuum Fluctuates ₂₀₁₃

FROM:
PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 627 0-01



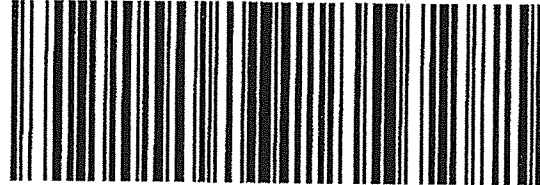
SHIP TO:

MR. RAYMOND PILAPIL, MANAGER
(630) 633-5501
IEPA - BOA - SPRINGFIELD, IL
BUREAU OF AIR COMPLIANCE
1021 NORTH GRAND AVENUE
SPRINGFIELD IL 62794-9276

UPS NEXT DAY AIR

TRACKING #: 1Z 26X A15 01 7360 6858

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REF 1:130028.017

BILLING: P/P

WS 16.0.31

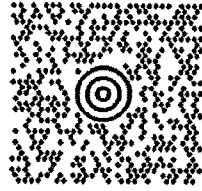
42.0A 07/2013

Fold here and place in label pouch

FROM:

PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 627 0-01



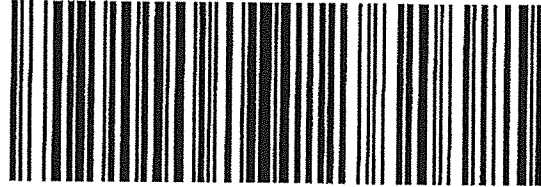
SHIP TO:

YASMINE KEPPNER-BAUMAN
(630) 633-5501
IEPA-BOA - Y. KEPPNER
COMPLIANCE SECTION
1021 NORTH GRAND AVENUE EAST
SPRINGFIELD IL 62703

UPS NEXT DAY AIR

TRACKING #: 1Z 26X A15 01 7566 1866

1



REF 1:130028-017

BILLING: P/P

WS 16.0.31

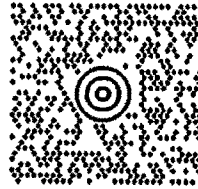
42.0A 07/2013

Fold here and place in label pouch

FROM:

PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 620 0-11



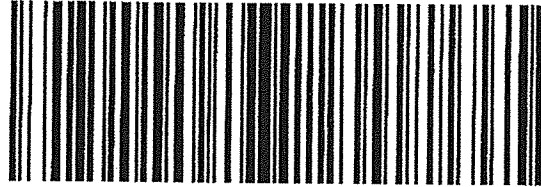
SHIP TO:

REGIONAL OFFICE
(630) 633-5501
IEPA-BOA - COLLINSVILLE, IL
DIVISION OF AIR POLLUTION CONTROL
2009 MALL STREET
COLLINSVILLE IL 62234

UPS NEXT DAY AIR

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REF 1:130028-017

BILLING: P/P

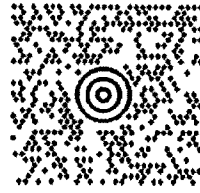
WS 16.0.31

42.0A 07/2013

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FROM:
PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 601 9-02



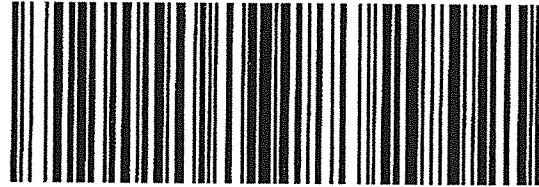
SHIP TO:

JOSHUA MCGARRY
CONGRESS DEVELOP. CO.- HILLSIDE LF
4100 WEST FRONTAGE ROAD
HILLSIDE IL 60162

UPS 2ND DAY AIR A.M.

TRACKING #: 1Z 26X A15 07 7516 8684

2A



REF 1:130028.017
REF 2:130028-017

BILLING: P/P

WS 16.0.31

42.0A 07/2013

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CORNERSTONE
Environmental Group, LLC

400 Quadrangle Drive, Suite E • Bolingbrook, IL 60440 • (630) 633-5520 • Fax: (630) 378-2640

UPS TRACKING #: 1Z 26X A15 01 7595 0795

August 8, 2013

Raymond Pilapil
Illinois Environmental Protection Agency
Bureau of Air, Compliance Section
1021 North Grand Avenue
P.O. Box 19276
Chicago, Illinois 62794-9276

Re: Congress Development Company - Hillside Landfill
Facility ID No. 031123ABP
Title V – CAAPP Permit No. 95090247
Request for Alternative Compliance Timeline (ACT):
Gas Extraction LFG Collectors: RW96, PHR08, GW123, GW54, GW100, GW111,
RW105, RW116, GW113, and RW92
Project Number 130028-009

Dear Mr. Pilapil:

Cornerstone Environmental Group, LLC., on behalf of Congress Development Company (Congress) – Hillside Landfill respectfully submits this request for an ACT in accordance with 40 Code of Federal Regulations (CFR) 60.755(a)(3).

35 IAC 220.240(a)(5) requires “the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in §60.753 (c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.”

BACKGROUND

Per the facility’s Title V Clean Air Act Program Permit (CAAPP) condition 7.1.3.c, “the affected landfill is subject to 35 IAC Part 220, Non-methane Organic Compounds, because construction or modification of the affected landfill commenced before May 30, 1991, and has accepted waste since November 8, 1987, pursuant to 35 IAC 220.200(a).” Additionally, the facility completed certified closure approved by Illinois Environmental Protection Agency’s (IEPA), Bureau of Land (BOL) on December 31, 2008.



Per the Compliance Schedule set forth in Section V, item 6, of the Final Consent Order 06 CH 1438, Congress was required to achieve compliance with 35 IAC 220 by no later than June 30, 2013. On May 10, 2013, Congress submitted higher operating value (HOV) requests for oxygen, pressure and temperature at individual wellheads to IEPA. IEPA approved the submitted requests on June 25, 2013, and Congress began implementing the approved limits beginning July 1, 2013. The following request details specific deviations from the approved HOV limits and/or exceedances of 35 IAC 220.

Specifically, 35 IAC 220.250(c) requires the facility to *“Operate each interior wellhead in the collection system with a landfill gas temperature less than 55°C (131°F) and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. A higher operating value demonstration that provides supporting data to show that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methagens must be approved by the Agency before such higher operating value may be used.”*

During the July 23, 24, and 25, 2013, monitoring events, two (2) LFG extraction collectors experienced oxygen concentrations and eight (8) LFG extraction collectors experienced elevated temperature readings greater than regulatory thresholds for oxygen and temperature and/or approved higher operating value (HOV) alternatives. Some of these collectors have pumps, which provide a mechanism to assist field personnel in reducing liquid levels within the collector.

CDC initiated corrective actions within five (5) days, re-monitored the collectors, but the oxygen concentrations and temperatures remained elevated for greater than fifteen (15) days. Based on historical data, CDC proposes the cause of exceedances is due to an ongoing abiotic exothermic process present within the permitted waste boundaries of the landfill. The by-products of this process include elevated oxygen concentration, the production of liquids, with associated positive pressure and high temperature. Due to the nature of the abiotic exothermic process, the expected typical responses to corrective measures initiated such as changes in applied vacuum or decreases/increases in temperature do not typically occur.

Changes in temperature and/or oxygen concentration in these collectors are independent of any corrective measures applied and are byproducts of the abiotic exothermic process. CDC observed and recorded significant volumes of fluid, elevated temperatures and high pressures at individual wellheads on the interior LFG extraction collectors installed within the permitted waste boundaries of the landfill.

Additionally, Congress previously submitted an ACT request for oxygen at RW92 on July 22, 2013. RW92 experienced an elevated oxygen concentration during for the reading taken on July 9, 2013. On July 25, 2013, CDC obtained a manual reading to obtain temperature and pressure data and recorded a temperature above the HOV approved limit of 175 degrees Fahrenheit (°F). CDC monitors collectors manually due to the presence of high moisture content of the gas, and/or high pressures beyond the capabilities of the portable meter, which would have resulted in potential damage to the LandTEC GEM 2000 meter. Due to these conditions, CDC was unable to obtain the oxygen reading to determine if the oxygen

concentration returned to below the HOV approved limit of 15%. Therefore, CDC assumes the original oxygen exceedance remains and the temperature exceedance that occurred on July 25, 2013, is a new exceedance.

Due to the volume of liquid generated by the exothermic process, the collectors often experience high oxygen concentration and elevated temperature readings. Collectors with pumps installed experience intermittent exceedances until the liquid levels recede, thus reducing the oxygen concentration. Reducing liquid levels in the collectors also restores flow of LFG, as well as, the actual LFG temperature present in the collectors. The table below identifies collectors exhibiting exceedances for greater than fifteen (15) days.

ID	Location	Parameter Exceeded	Approved HOVs			Initial Date of Exceedance	ACT Deadline	Pump
			Temp.	O ₂	Pressure			
RW96	West	OXYGEN				25-Jul-13	9-Aug-13	N
PHR08	West	OXYGEN				25-Jul-13	9-Aug-13	N
GW123	West	TEMPERATURE		15%		25-Jul-13	9-Aug-13	Y
GW54	West	TEMPERATURE	175°F			24-Jul-13	8-Aug-13	N
GW100	West	TEMPERATURE	175°F			25-Jul-13	9-Aug-13	Y
GW111	West	TEMPERATURE	170°F			25-Jul-13	9-Aug-13	Y
RW105	West	TEMPERATURE	175°F			25-Jul-13	9-Aug-13	N
RW116	West	TEMPERATURE	180°F			25-Jul-13	9-Aug-13	N
GW113	West	TEMPERATURE	175°F	20%		25-Jul-13	9-Aug-13	Y
RW92	West	TEMPERATURE	175°F	15%		25-Jul-13	9-Aug-13	N

SUMMARY

Congress understands the intent of 35 IAC 220.250(b) is to reduce the potential for a subsurface oxidation event. However, due to the nature of the abiotic exothermic process, and the requirements of the compliance requirements in Final Consent Order 06 CH 1438, Congress must maintain active extraction on collectors to mitigate the reaction generated positive pressure, oversaturation of the LFG, as well as, reduce the potential for and to control odors.

Based on the data evaluations completed as part of this submittal, in accordance with 35 IAC 220.250(c), Congress respectfully requests one-hundred and twenty (120) days from the date of the initial exceedance for each collector. During this time, Congress intends to complete additional investigation, allow sufficient time for pumps to reduce liquid levels and allow sufficient time for the wellfield to balance as liquid levels recede.

Additionally, Congress, as field conditions allow, will complete the following for each collector:

- Inspect and replace existing pumps as needed;
- Order and install pumps in collectors currently without pumps; and

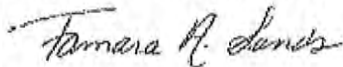
The table below lists the one-hundred and twenty (120) day deadline requested for each collector.

ID	Location	Initial Date of Exceedance	120-Day Date
RW96	West	25-Jul-13	22-Nov-13
PHR08	West	25-Jul-13	22-Nov-13
GW123	West	25-Jul-13	22-Nov-13
WE101	West	23-Jul-13	20-Nov-13
GW54	West	24-Jul-13	21-Nov-13
GW100	West	25-Jul-13	22-Nov-13
GW111	West	25-Jul-13	22-Nov-13
RW105	West	25-Jul-13	22-Nov-13
RW116	West	25-Jul-13	22-Nov-13
GW113	West	25-Jul-13	22-Nov-13
RW92	West	25-Jul-13	22-Nov-13

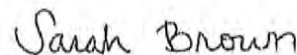
If you have any questions, please contact Mr. Josh McGarry at (708) 544-5195 or Ms. Tami Sands at (630) 633-5827.

Sincerely,

Cornerstone Environmental Group, LLC



Tamara Sands
Project Manager



Sarah Brown
Project Scientist

Attachment A

cc: Yasmine Keppner-Bauman – IEPA-BOA – Compliance Section
IEPA-BOA – Collinsville Regional Office

Josh McGarry, Congress
Steve Smith, Republic – electronic copy only
Niki Wuestenberg, Republic – electronic copy only
Cornerstone Project Binder

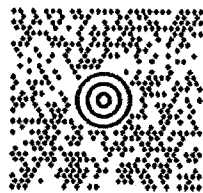
ATTACHMENT A

Cogress Development Company
 Attachment A
 Western 1/3 Well Exceedances

Well ID	Date	Time	CH ₄ (%)	CO ₂ (%)	O ₂ (%)	Balance (%)	Initial Static Press. (PSIG)	Adjusted Static Press. (in. H ₂ O)	Adjusted Static Ratio	Initial Temp. (°F)	Adjusted Temp. (°F)	Adjusted Flow (scfm)	Diff. Press. (in. H ₂ O)	Brn. Press. (in. H ₂ O)	System Pressure (in. H ₂ O)	Static Press. At Flow	System Press. % of Plane Vacuum	Comments
CD00RW96	25-Jul-13	10:30:00	1.5	48.7	7	42.7	29.3	29.2	6.1	90	90	0	0.079	29.28	-43.95	67.35%	Initial Reading	
CD00RW96	25-Jul-13	10:35:00	1.8	48.8	6.5	41.9	29.3	29.2	5.4	90	90	0	-0.005	29.28	-43.95	66.99%	Second Reading: No Flow Device Valve 100% Open No Change Available Vacuum Fluorometer.	
CD00RW96	08-Aug-13	8:50:00	2.6	31.5	4.9	37	30.1	30.2	7.8	78	78	0	-0.118	29.23	-30.24	66.99%	Initial Reading	
CD00RW96	08-Aug-13	8:52:00	2.7	34.4	4.8	36.1	30.1	30.2	7.8	78	78	0	0.258	29.23	-30.08	66.99%	Second Reading: No Flow Device Valve 100% Open No Change Available Vacuum Fluorometer.	
CD00RH08	25-Jul-13	10:31:00	9.5	16.7	14.4	69.4	29.4	29.4	4.1	102	102	0	-0.188	29.29	-43.95	66.97%	Initial Reading	
CD00RH08	25-Jul-13	10:33:00	13.7	12.8	5.3	29.6	29.6	29.6	10.2	102	102	0	-0.023	29.28	-43.95	67.28%	Second Reading: No Flow Device Valve 100% Open No Change Available Vacuum Fluorometer.	
CD00RH08	06-Aug-13	14:50:00	1.7	35.4	9.1	42.5	29.8	29.7	5.2	85	85	0	-0.003	29.02	-29.52	68.62%	Initial Reading	
CD00RH08	06-Aug-13	14:51:00	3.6	5.5	17.5	71.4	31.4	31.4	4.2	85	85	0	0.027	29.02	-29.87	68.51%	Second Reading: No Flow Device Valve 50% Open Closed Valve 1/2 To 1 Turn	
CD00GW11	25-Jul-13	9:33:00	NM	NM	NM	30.2	30.2	30.2	185	185	185	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 185 degrees Pressure: 28.3	
CD00GW11	08-Aug-13	7:16:00	NM	NM	NM	30.2	30.2	30.2	185	185	185	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 180 degrees Pressure: 30.2	
CD00GW11	08-Aug-13	7:16:00	NM	NM	NM	30.2	30.2	30.2	185	185	185	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 180 degrees Pressure: 30.2	
CD00GW12	25-Jul-13	11:41:00	11.6	78.8	0	8.6	29.9	30	150	150	150	6	0.073	29.37	-30.45	69.29%	Initial Reading	
CD00GW12	25-Jul-13	11:43:00	12.9	80.2	0	6.9	30.6	30.3	146	146	146	5	0.051	29.37	-30.4	69.17%	Second Reading: Off-Flow Device Valve 100% Open No Change	
CD00GW12	08-Aug-13	7:52:00	NM	NM	NM	30.3	30.3	30.3	172	172	172	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 175 degrees Pressure: 30.5	
CD00WE101	23-Jul-13	11:00:00	33.2	19.9	8.7	38.2	2.1	2.1	4.4	60	60	6	0.01	29.12	-43.95	67.78%	Initial Reading	
CD00WE101	23-Jul-13	11:08:00	10.3	5.6	16.2	68	2	2	4.2	60	60	6	0.025	29.13	-43.95	68.53%	Second Reading: Line Valve Wellhead Valve 100% Open No Change	
CD00WE101	07-Aug-13	0:58:11:11	42.5	25.2	5.6	26.7	-0.3	-0.3	100	100	100	9	-0.003	29.06	-29.49	67.78%	Initial Reading	
CD00WE101	07-Aug-13	0:59:53:33	43.2	25.4	5.3	26.1	-0.3	-0.3	100	100	100	5	0.008	29.06	-29.2	67.78%	Second Reading: Line Valve Wellhead Valve 100% Open No Change	
CD00GW54	24-Jul-13	11:37:00	NM	NM	NM	30.2	30.2	30.2	180	180	180	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 180 degrees Pressure: 28.9	
CD00GW54	08-Aug-13	7:08:00	NM	NM	NM	30.2	30.2	30.2	175	175	175	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 175 degrees Pressure: 30.2	
CD00GW100	25-Jul-13	7:25:00	NM	NM	NM	27.6	27.6	27.6	180	180	180	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 180 degrees Pressure: 27.6	
CD00GW100	08-Aug-13	7:13:00	NM	NM	NM	29.2	29.2	29.2	175	175	175	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 175 degrees Pressure: 29.2	
CD00RW105	25-Jul-13	12:19:00	NM	NM	NM	29.3	29.3	29.3	200	200	200	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 175 degrees Pressure: 27.6	
CD00RW105	08-Aug-13	7:27:00	NM	NM	NM	29.6	29.6	29.6	180	180	180	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 180 degrees Pressure: 29.3	
CD00RW116	25-Jul-13	12:14:00	NM	NM	NM	29.1	29.1	29.1	200	200	200	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 180 degrees Pressure: 29.1	
CD00RW116	08-Aug-13	7:24:00	NM	NM	NM	27.3	27.3	27.3	180	180	180	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 180 degrees Pressure: 29.1	
CD00GW113	25-Jul-13	6:59:00	NM	NM	NM	30.3	30.3	30.3	180	180	180	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 180 degrees Pressure: 29.3	
CD00RW92	02-Jul-15	13:56:00	0.1	9	16.9	74	31.3	31.3	4.1	90	90	6	0.055	29.17	-43.125	72.49%	Initial Reading Valve 100% Open	
CD00RW92	02-Jul-15	13:59:00	0.2	11.8	16	72	31.2	31.2	4.5	90	90	4	0.033	29.17	-43.125	71.87%	Second Reading: Off-Flow Device Valve 50% Open No Change Available Vacuum Fluorometer.	
CD00RW92	25-Jul-13	12:36:00	NM	NM	NM	28.1	28.1	28.1	183	183	183	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 185 degrees Pressure: 28.1	
CD00RW92	08-Aug-13	7:52:00	NM	NM	NM	28.3	28.3	28.3	180	180	180	0	0	29.28	-43.95	67.35%	Manually entered: Unable to get stem reading due to highly saturated gas Temp: 180 degrees Pressure: 28.3	

FROM:
PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 627 0-01



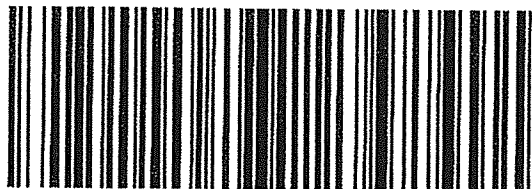
SHIP TO:

MR. RAYMOND PILAPIL
(630) 633-5501
IEPA - BOA - SPRINGFIELD, IL
BUREAU OF AIR COMPLIANCE SECTION
1021 NORTH GRAND AVENUE
SPRINGFIELD IL 62794-9276

UPS NEXT DAY AIR

TRACKING #: 1Z 26X A15 01 7595 0795

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REF 1:130028-017

BILLING: P/P

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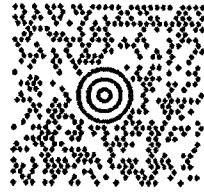
42.0A 07/2013

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FROM:

PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 627 0-01



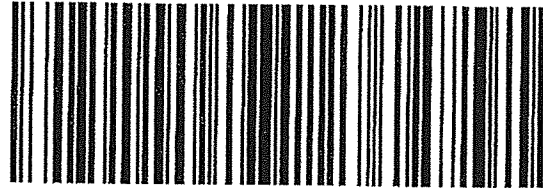
SHIP TO:

YASMINE KEPPNER-BAUMAN
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IEPA-BOA - Y. KEPPNER-BAUMAN
BUREAU OF AIR COMPLIANCE SECTION
1021 NORTH GRAND AVENUE EAST
SPRINGFIELD IL 62794-9276

UPS NEXT DAY AIR

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REF 1:130028-017

BILLING: P/P

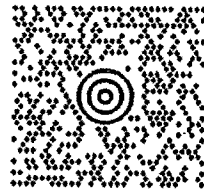
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400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 620 0-11



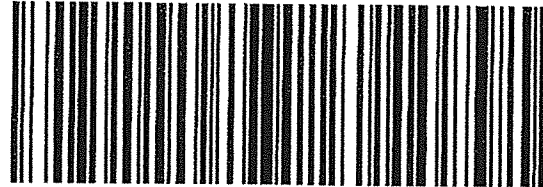
SHIP TO:

REGIONAL OFFICE
(630) 633-5501
IEPA-BOA - COLLINSVILLE, IL
DIVISION OF AIR POLLUTION CONTROL
2009 MALL STREET
COLLINSVILLE IL 62234

UPS NEXT DAY AIR

TRACKING #: 1Z 26X A15 01 7419 5210

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REF 1:130028.017

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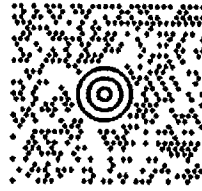
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FROM:

1 LBS

1 OF 1

PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440



IL 601 9-02

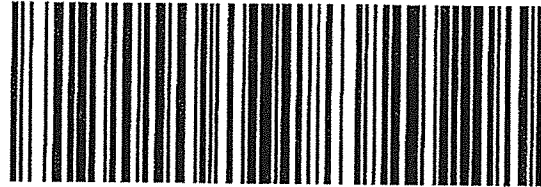


SHIP TO:

JOSHUA MCGARRY
CONGRESS DEVELOP. CO.- HILLSIDE LF
4100 WEST FRONTAGE ROAD
HILLSIDE IL 60162

UPS GROUND

TRACKING #: 1Z 26X A15 03 7313 9823



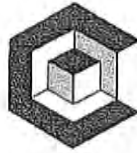
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CORNERSTONE
Environmental Group, LLC

400 Quadrangle Drive, Suite E • Bolingbrook, IL 60440 • (630) 633-5520 • Fax: (630) 378-2640

UPS TRACKING #: 1Z 26X A15 01 7551 4239

August 14, 2013

Raymond Pilapil
Illinois Environmental Protection Agency
Bureau of Air, Compliance Section
1021 North Grand Avenue
P.O. Box 19276
Chicago, Illinois 62794-9276

Re: Congress Development Company - Hillside Landfill
Facility ID No. 031123ABP
Title V – CAAPP Permit No. 95090247
Request for Alternative Compliance Timeline (ACT):
Gas Extraction Collectors: RW60
Project Number 130028-009

Dear Mr. Pilapil:

Cornerstone Environmental Group, LLC., on behalf of Congress Development Company (CDC) – Hillside Landfill respectfully submits this request for an ACT in accordance with 35 Illinois Administrative Code (IAC) Subpart 220.

Specifically, 35 IAC 220.240(a)(5) requires: *“the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in §60.753 (c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.”*

BACKGROUND

Per the facility’s Title V Clean Air Act Program Permit (CAAPP) condition 7.1.3.c, *“the affected landfill is subject to 35 IAC Part 220, Non-methane Organic Compounds, because construction or modification of the affected landfill commenced before May 30, 1991, and has accepted waste since November 8, 1987, pursuant to 35 IAC 220.200(a).”* Additionally, the facility completed certified closure approved by Illinois Environmental Protection Agency’s (IEPA), Bureau of Land (BOL) on December 31, 2008.



Raymond Pilapil
August 14, 2013
Page 2

Per the Compliance Schedule set forth in Section V, item 6, of the Final Consent Order 06 CH 1438, Congress was required to achieve compliance with 35 IAC 220 by no later than June 30, 2013. On May 10, 2013, Congress submitted higher operating value (HOV) requests for oxygen, pressure and temperature at individual wellheads to IEPA. IEPA approved the submitted requests on June 25, 2013, and Congress began implementing the approved limits beginning July 1, 2013. The following request details specific deviations from the approved HOV limits and/or exceedances of 35 IAC 220.

Specifically, 35 IAC 220.250(c) requires the facility to *“Operate each interior wellhead in the collection system with a landfill gas temperature less than 55°C (131°F) and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. A higher operating value demonstration that provides supporting data to show that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methagens must be approved by the Agency before such higher operating value may be used.”*

During the July 30th, 2013, monitoring events, one (1) collector, CD00RW60 (RW60), experienced elevated temperature greater than or equal to 131 degrees Fahrenheit (°F). CDC initiated corrective actions within five (5) days, re-monitored the collector, but the temperature remained elevated.

Based on historical data, CDC proposes the cause of exceedance is due to an ongoing abiotic exothermic process present within the permitted waste boundaries of the landfill. The by-products of this process include elevated oxygen concentrations, the production of liquids and hydrogen, with associated high positive pressures and high temperatures. Due to the nature of the abiotic exothermic process, the expected typical responses to corrective measures initiated such as changes in applied vacuum to reduce oxygen concentration and temperature typically do not occur.

Changes in oxygen concentration and temperatures in these collectors are independent of any corrective measures applied and are byproducts of the abiotic exothermic process. CDC observed and recorded significant volumes of fluid, elevated temperatures and high pressures at individual wellheads on the interior LFG extraction collectors installed within the permitted waste boundaries of the landfill because of this process.

As stated previously, temperatures in individual collectors appear to decrease or increase based solely on the abiotic exothermic process' residual effects.

The table below provides an overview of the exceedances, along with the status of approved higher operating values (HOV) for RW60. Additionally, Attachment A, included with this submittal, contains the monitoring data for this collector.

Well ID	Location	Parameter Exceeded	Approved HOVs			Initial Date of Exceedance	ACT Deadline	Pump
			Temp.	O ₂	Pressure			
RW60	East	Temperature	NONE	NONE	NONE	30-Jul-13	14-Aug-13	N

SUMMARY

CDC understands the intent of 35 IAC 220.250(b) is to reduce the potential for a subsurface oxidation event. However, due to the nature of the abiotic exothermic process, and the requirements of the compliance requirements in Final Consent Order 06 CH 1438, CDC must maintain active extraction on wells to mitigate the reaction generated positive pressure, oversaturation of the LFG, as well as, reduce the potential for and to control odors.

Based on the data evaluations completed as part of this submittal, in accordance with 35 IAC 220.250(c), Congress respectfully requests one-hundred and twenty (120) days from the date of the initial exceedance. This will allow CDC sufficient time to complete the following:

- Continue tuning the collector based on the field conditions present caused by the abiotic exothermic process;
- As field conditions allow, evaluate the benefit of installing a pump in RW60; and
- Allow sufficient time for the abiotic exothermic process to stabilize in the area.

The table below lists the one-hundred and twenty (120) day deadline requested for RW60.

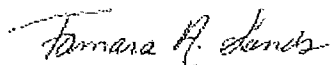
Well ID	Location	Initial Date of Exceedance	120-Day Date
RW60	East	30-July-13	27-Nov-13

Raymond Pilapil
August 14, 2013
Page 4

If you have any questions, please contact Mr. Josh McGarry at (708) 544-5195 or me at (630) 633-5827.

Sincerely,

Cornerstone Environmental Group, LLC



Tamara Sands
Project Manager

Attachment A

cc: Yasmine Keppner-Bauman – IEPA-BOA – Compliance Section
IEPA-BOA – Collinsville Regional Office

Josh McGarry, Congress
Steve Smith, Republic – electronic copy only
Niki Wuestenberg, Republic – electronic copy only
Cornerstone Project Binder

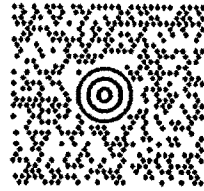
ATTACHMENT A

Congress Development Company
Attachment A
Eastern 2/3 Collector Exceedances

Well ID	Date	Time	CH ₄ (%)	CO ₂ (%)	O ₂ (%)	Initial Static Press. (H ₂ O)	Adjusted Static Press. (in. H ₂ O)	Initial Temp. (°F)	Adjusted Temp. (°F)	Adjusted Flow (scfm)	Diff. Press. (in. H ₂ O)	Comments
CD00RW60	30-Jul-13	13:51:00	42.3	40.8	0	-9.5	-9.5	135	135	22	3.238	Initial Reading _{min}
CD00RW60	30-Jul-13	13:56:00	42.6	41.1	0	-9.5	-10.2	135	135	24	3.984	Second Reading, Orifice Plate Wellhead, Valve Barely Open, No Charge _{min}
CD00RW60	02-Aug-13	15:35:00	43.3	42	0.3	-9.4	-9.4	140	140	22	3.231	Initial Reading _{min}
CD00RW60	02-Aug-13	15:28:00	43.3	42.3	0.2	-8.2	-8.2	140	140	13	1.133	Second Reading, Orifice Plate Wellhead, Valve Barely Open, Closed Valve 1/2 Turn or Less, Available Vacuum Fluctuates _{min}
CD00RW60	13-Aug-13	9:50:00	45	45	0	-7.4	-7.5	135	135	13	1.26	Initial Reading _{min}
CD00RW60	13-Aug-13	9:54:00	44.3	43.3	0	-7.3	-7.3	135	135	12	1.106	Second Reading, Orifice Plate Wellhead, Valve Barely Open, Closed Valve 1/2 Turn or Less _{min}

FROM:
PATTY SCHULTZ
(630) 633-5520
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400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 627 0-01



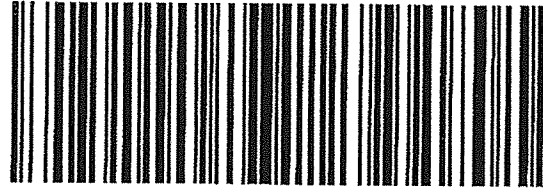
SHIP TO:

MR. RAYMOND PILAPIL
(630) 633-5501
IEPA - BOA - SPRINGFIELD, IL
BUREAU OF AIR COMPLIANCE UNIT
1021 NORTH GRAND AVENUE
SPRINGFIELD IL 62703

UPS NEXT DAY AIR

TRACKING #: 1Z 26X A15 01 7551 4239

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REF 1:130028-017

BILLING: P/P

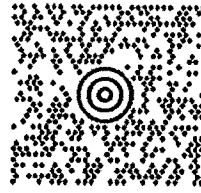
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FROM:
PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 627 0-01



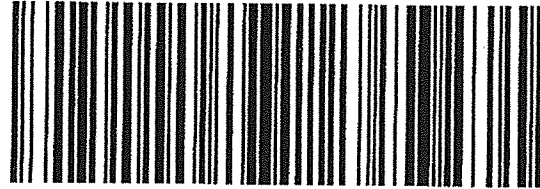
SHIP TO:

YASMINE KEPPNER-BAUMAN
(630) 633-5501
IEPA-BOA - Y. KEPPNER-BAUMAN
BUREAU OF AIR COMPLIANCE SECTION
1021 NORTH GRAND AVENUE EAST
SPRINGFIELD IL 62794-9276

UPS NEXT DAY AIR

TRACKING #: 1Z 26X A15 01 7536 6042

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REF 1:130028-017

BILLING: P/P

WS 16.0.31

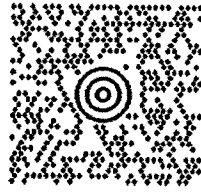
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FROM:

PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 620 0-11



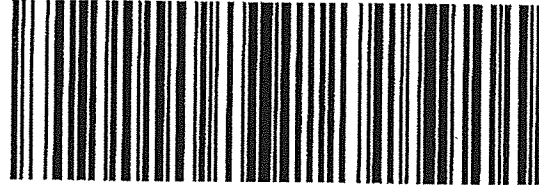
SHIP TO:

REGIONAL OFFICE
(630) 633-5501
IEPA-BOA - COLLINSVILLE, IL
DIVISION OF AIR POLLUTION CONTROL
2009 MALL STREET
COLLINSVILLE IL 62234

UPS NEXT DAY AIR

TRACKING #: 1Z 26X A15 01 7529 9455

1



REF 1:130028-017

BILLING: P/P

WS 18.0.31

42.0A 07/2013

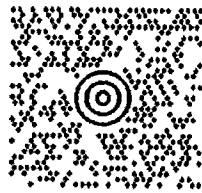
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FROM:

1 LBS

1 OF 1

PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440



IL 601 9-02

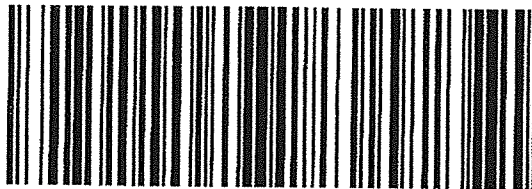


SHIP TO:

JOSHUA MCGARRY
CONGRESS DEVELOP. CO.- HILLSIDE LF
4100 WEST FRONTAGE ROAD
HILLSIDE IL 60162

UPS GROUND

TRACKING #: 1Z 26X A15 03 7349 0461



REF 1:130028-017

BILLING: P/P

WS 16.D.31

42.0A 07/2013

Fold here and place in label pouch



CORNERSTONE
Environmental Group, LLC

400 Quadrangle Drive, Suite E • Bolingbrook, IL 60440 • (630) 633-5520 • Fax: (630) 378-2640

UPS TRACKING #: 1Z 13Y 28X NT 9494 9096

August 23, 2013

Raymond Pilapil
Illinois Environmental Protection Agency
Bureau of Air, Compliance Section
1021 North Grand Avenue
P.O. Box 19276
Chicago, Illinois 62794-9276

Re: Congress Development Company - Hillside Landfill
Facility ID No. 031123ABP
Title V – CAAPP Permit No. 95090247
Request for Alternative Compliance Timeline (ACT):
Gas Extraction Collectors: RW87 and RW95
Project Number 130028-009

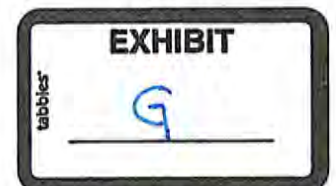
Dear Mr. Pilapil:

Cornerstone Environmental Group, LLC., on behalf of Congress Development Company (CDC) – Hillside Landfill respectfully submits this request for an ACT in accordance with 35 Illinois Administrative Code (IAC) Subpart 220.

Specifically, 35 IAC 220.240(a)(5) requires: *“the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in §60.753 (c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.”*

BACKGROUND

Per the facility’s Title V Clean Air Act Program Permit (CAAPP) condition 7.1.3.c, *“the affected landfill is subject to 35 IAC Part 220, Non-methane Organic Compounds, because construction or modification of the affected landfill commenced before May 30, 1991, and has accepted waste since November 8, 1987, pursuant to 35 IAC 220.200(a).”* Additionally, the facility completed certified closure approved by Illinois Environmental Protection Agency’s (IEPA), Bureau of Land (BOL) on December 31, 2008.



Raymond Pilapil
August 23, 2013
Page 2

Per the Compliance Schedule set forth in Section V, item 6, of the Final Consent Order 06 CH 1438, Congress was required to achieve compliance with 35 IAC 220 by no later than June 30, 2013. On May 10, 2013, Congress submitted higher operating value (HOV) requests for oxygen, pressure and temperature at individual wellheads to IEPA. IEPA approved the submitted requests on June 25, 2013, and Congress began implementing the approved limits beginning July 1, 2013. The following request details specific deviations from the approved HOV limits and/or exceedances of 35 IAC 220.

Specifically, 35 IAC 220.250(c) requires the facility to *“Operate each interior wellhead in the collection system with a landfill gas temperature less than 55°C (131°F) and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. A higher operating value demonstration that provides supporting data to show that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methagens must be approved by the Agency before such higher operating value may be used.”*

During the August 8, 2013, monitoring events, collector CD00RW95 (RW95) experienced elevated temperature greater than or equal to 131 degrees Fahrenheit (°F) and collector CD00RW87 (RW87) experienced an elevated oxygen concentration greater than 5 percent (%). CDC initiated corrective actions within five (5) days, re-monitored the collectors, but the collectors continued to deviate from regulatory parameters.

Based on historical data, CDC proposes the cause of exceedance is due to an ongoing abiotic exothermic process present within the permitted waste boundaries of the landfill. The by-products of this process include elevated oxygen concentrations, the production of liquids and hydrogen, with associated high positive pressures and high temperatures. Due to the nature of the abiotic exothermic process, the expected typical responses to corrective measures initiated such as changes in applied vacuum to reduce oxygen concentration and temperature typically do not occur.

Changes in oxygen concentration and temperatures in these collectors are independent of any corrective measures applied and are byproducts of the abiotic exothermic process. CDC observed and recorded significant volumes of fluid, elevated temperatures and high pressures at individual wellheads on the interior LFG extraction collectors installed within the permitted waste boundaries of the landfill because of this process.

As stated previously, temperatures in individual collectors appear to decrease or increase based solely on the abiotic exothermic process' residual effects.

The table below provides an overview of the exceedances, along with the status of all approved higher operating values (HOV). Additionally, Attachment A, included with this submittal, contains the monitoring data for this collector.

Well ID	Location	Parameter Exceeded	Approved HOVs			Initial Date of Exceedance	ACT Deadline	Pump
			Temp.	O ₂	Pressure			
RW87	West	Oxygen	175°F	NONE	NONE	8-Aug-13	23-Aug-13	Y
RW95	West	Temperature	180°F	NONE	NONE	8-Aug-13	23-Aug-13	Y

SUMMARY

CDC understands the intent of 35 IAC 220.250(b) is to reduce the potential for a subsurface oxidation event. However, due to the nature of the abiotic exothermic process, and the requirements of the compliance requirements in Final Consent Order 06 CH 1438, CDC must maintain active extraction on wells to mitigate the reaction generated positive pressure, oversaturation of the LFG, as well as, reduce the potential for and to control odors.

Based on the data evaluations completed as part of this submittal, in accordance with 35 IAC 220.250(c), Congress respectfully requests one-hundred and twenty (120) days from the date of the initial exceedance. This will allow CDC sufficient time to complete the following:

- Continue tuning the collector based on the field conditions present caused by the abiotic exothermic process and
- Allow sufficient time for the abiotic exothermic process to stabilize in the area.

The table below lists the one-hundred and twenty (120) day deadline requested for RW87 and RW95.

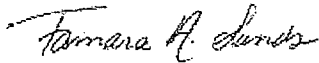
Well ID	Location	Initial Date of Exceedance	120-Day Date
RW87	West	8-Aug-13	6-Dec-13
RW95	West	8-Aug-13	6-Dec-13

Raymond Pilapil
August 23, 2013
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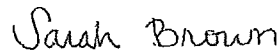
If you have any questions, please contact Mr. Josh McGarry at (708) 544-5195 or me at (630) 633-5827.

Sincerely,

Cornerstone Environmental Group, LLC



Tamara Sands
Project Manager



Sarah Brown
Project Scientist

Attachment A





cc: Yasmine Keppner-Bauman – IEPA-BOA – Compliance Section
IEPA-BOA – Collinsville Regional Office

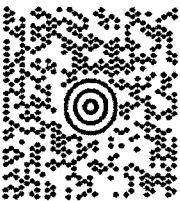

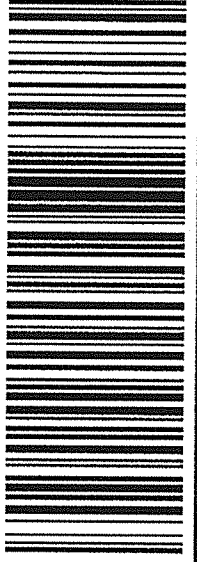

Josh McGarry, Congress
Steve Smith, Republic – electronic copy only
Niki Wuestenberg, Republic – electronic copy only
Cornerstone Project Binder


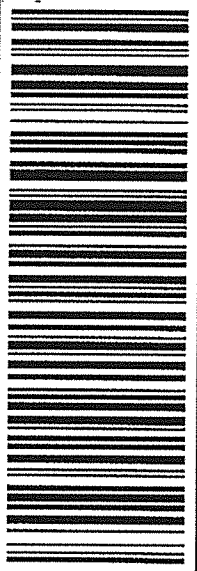

ATTACHMENT A

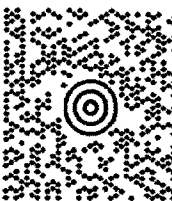

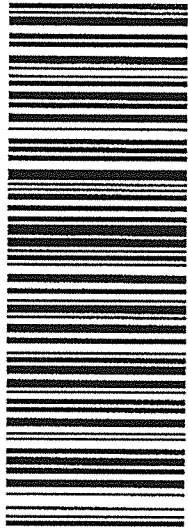

Congress Development Company
Attachment A
Western 1/3 Collector Exceedances

Well ID	Date	Time	CH ₄ (%)	CO ₂ (%)	O ₂ (%)	Initial Static Press. (H ₂ O)	Adjusted Static Press. (in. H ₂ O)	Initial Temp. (°F)	Adjusted Temp. (°F)	Adjusted Flow (scfm)	Diff. Press. (in. H ₂ O)	Comments
CD06RW97	09-Jul-13	13:27:00	31.4	61.5	0	-30.9	-30.9	150	150	0	0.173	Initial Reading.....
CD06RW97	09-Jul-13	13:29:00	30.9	63.4	0	-30.9	-30.8	150	150	0	0.063	Second Reading;No Flow Device, Valve 100% Open ;No Change; Available Vacuum Fluctuates,...
CD06RW97	26-Jul-13	9:51:40	31.7	65.7	0	-30.5	-30.6	150	150	0	0.158	Initial Reading.....
CD06RW97	26-Jul-13	9:53:00	31.5	66.3	0	-30.8	-30.6	150	150	0	0.141	Second Reading;No Flow Device, Valve 100% Open ;No Change ...
CD06RW97	08-Aug-13	10:55:00	1.1	51.9	6.5	-30.6	-30.4	122	122	0	0.148	Initial Reading.....
CD06RW97	08-Aug-13	10:57:00	1	52.1	6.7	-30.2	-30.3	122	122	0	0.019	Second Reading;No Flow Device, Valve 50% Open ;No Change ...
CD06RW97	23-Aug-13	14:29:00			NM	-29		180				Unable to get gem reading due to highly saturated gas
CD06RW95	09-Jul-13	8:20:00			NM	-30.6		180				Manually entered; Unable to get gem reading due to highly saturated gas Temp: 180 degrees Pressure -30.6
CD06RW95	25-Jul-13	6:59:00			NM	-29.2		175				Manually entered; Unable to get gem reading due to highly saturated gas Temp: 175 degrees Pressure -29.2
CD06RW95	08-Aug-13	11:20:00			NM	-31.1		200				Manually entered; Unable to get gem reading due to highly saturated gas Temp: 200 degrees Pressure -31.1
CD06RW95	23-Aug-13	13:46:00			NM	-28.9		185				Unable to get gem reading due to highly saturated gas

<p>RACHELLE MAXHEIMER 217-502-6442 CORNERSTONE ENVIRONMENTAL GROU 2705 EASTWOOD DRIVE TAYLORVILLE IL 62566</p> <p>SHIP TO: MR. RAYMOND PILAPIL 217-782-2113 IL ENVIRONMENTAL PROTECTION AGENCY 1021 NORTH GRAND AVENUE EAST COMPLIANCE SECTION BUREAU OF AIR SPRINGFIELD IL 62702-4059</p>	<p>0.0 LBS LTR 1 OF 1</p>
 <p>IL 627 0-01</p> 	<p>UPS NEXT DAY AIR</p> <p>TRACKING #: 1Z 13Y 28X NT 9494 9096</p> <p>1</p> 
<p>BILLING: P/P ATTENTION UPS DRIVER: SHIPPER RELEASE</p> <p>Reference# 1: 130028-017</p> <p>UIS 15.6.09. WHITE90 36.0A 01/2013</p> 	

<p>RACHELLE MAXHEIMER 217-502-6442 CORNERSTONE ENVIRONMENTAL GROU 2705 EASTWOOD DRIVE TAYLORVILLE IL 62568</p> <p>0.0 LBS LTR 1 OF 1</p> <p>SHIP TO: MS. YASMINE KEPPNER 217-782-2113 IL ENVIRONMENTAL PROTECTION AGENCY 1021 NORTH GRAND AVENUE EAST COMPLIANCE SECTION (MC 40) BUREAU OF AIR SPRINGFIELD IL 62702-4059</p>	 <p>IL 627 0-01</p> 	<p>UPS NEXT DAY AIR</p> <p>TRACKING #: 1Z 13Y 28X NT 9139 1907 1</p>		<p>BILLING: P/P ATTENTION UPS DRIVER: SHIPPER RELEASE</p> <p>Reference#1: 130028-017</p> <p>US 156.09, WNTB9D 36.0A 01/2013</p> 
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<p>RACHELLE MAXHEIMER 217-502-6442 CORNERSTONE ENVIRONMENTAL GROU 2705 EASTWOOD DRIVE TAYLORVILLE IL 62566</p> <p>SHIP TO: DIVISION OF AIR POLLTION CTRL. 217-782-2113 IEPA 2009 MALL STREET COLLINSVILLE IL 62234-1832</p>	<p>0.0 LBS LTR 1 OF 1</p>	<p>IL 620 0-11</p> 	<p>UPS NEXT DAY AIR SAVER 1P</p> <p>TRACKING #: 1Z 13Y 28X NW 9332 4113</p> 	<p>BILLING: P/P ATTENTION UPS DRIVER: SHIPPER RELEASE</p> <p>Reference#1: 130028-017</p> <p>US 15.6.09. WNTPE90 36.0A 01/2013</p> 
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<p>RACHELLE MAXHEIMER 217-502-6442 CORNERSTONE ENVIRONMENTAL GROU 2705 EASTWOOD DRIVE TAYLORVILLE IL 62568</p> <p>SHIP TO: JOSHUA MCGARRY CONGRESS DEVELOP. CO. - HILLSIDE LF 4100 WEST FRONTAGE ROAD HILLSIDE IL 60162-1764</p>	<p>0.0 LBS LTR 1 OF 1</p>
 <p>IL 601 9-02</p> 	<p>UPS 2ND DAY AIR</p> <p>TRACKING #: 1Z 13Y 28X 02 9230 1728</p> <p>2</p> 
<p>BILLING: P/P</p> <p>Reference# 1: 130028-017</p> <p>US 15-6.09. PNFTE90 36.0A 01/2013</p> 	



CORNERSTONE
Environmental Group, LLC

400 Quadrangle Drive, Suite E • Bolingbrook, IL 60440 • (630) 633-5520 • Fax: (630) 378-2640

UPS TRACKING #: 1Z4R16580290386300

September 5, 2013

Raymond Pilapil
Illinois Environmental Protection Agency
Bureau of Air, Compliance Section
1021 North Grand Avenue
P.O. Box 19276
Chicago, Illinois 62794-9276

Re: Congress Development Company - Hillside Landfill
Facility ID No. 031123ABP
Title V – CAAPP Permit No. 95090247
Request for Alternative Compliance Timeline (ACT):
Gas Extraction Collectors: RW75, RW87, WE104
Project Number 130028-009

Dear Mr. Pilapil:

Cornerstone Environmental Group, LLC., on behalf of Congress Development Company (CDC) – Hillside Landfill respectfully submits this request for an ACT in accordance with 35 Illinois Administrative Code (IAC) Subpart 220.

Specifically, 35 IAC 220.240(a)(5) requires: *“the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in §60.753 (c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.”*

BACKGROUND

Per the facility’s Title V Clean Air Act Program Permit (CAAPP) condition 7.1.3.c, *“the affected landfill is subject to 35 IAC Part 220, Non-methane Organic Compounds, because construction or modification of the affected landfill commenced before May 30, 1991, and has accepted waste since November 8, 1987, pursuant to 35 IAC 220.200(a).”* Additionally, the facility completed certified closure approved by Illinois Environmental Protection Agency’s (IEPA), Bureau of Land (BOL) on December 31, 2008.



Per the Compliance Schedule set forth in Section V, item 6, of the Final Consent Order 06 CH 1438, Congress was required to achieve compliance with 35 IAC 220 by no later than June 30, 2013. On May 10, 2013, Congress submitted higher operating value (HOV) requests for oxygen, pressure and temperature at individual wellheads to IEPA. IEPA approved the submitted requests on June 25, 2013, and Congress began implementing the approved limits beginning July 1, 2013. The following request details specific deviations from the approved HOV limits and/or exceedances of 35 IAC 220.

Specifically, 35 IAC 220.250(c) requires the facility to *“Operate each interior wellhead in the collection system with a landfill gas temperature less than 55°C (131°F) and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. A higher operating value demonstration that provides supporting data to show that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methagens must be approved by the Agency before such higher operating value may be used.”*

During the August 21, 2013, monitoring events, collector CD00RW87 (RW87) experienced elevated temperature greater than or equal to 131 degrees Fahrenheit (°F) and collectors CD00RW75 (RW87) and CD0WE104 (WE104) experienced an elevated oxygen concentration greater than 5 percent (%). CDC initiated corrective actions within five (5) days, re-monitored the collectors, but the collectors continued to deviate from regulatory parameters.

Based on historical data, CDC proposes the cause of exceedance is due to an ongoing abiotic exothermic process present within the permitted waste boundaries of the landfill. The by-products of this process include elevated oxygen concentrations, the production of liquids and hydrogen, with associated high positive pressures and high temperatures. Due to the nature of the abiotic exothermic process, the expected typical responses to corrective measures initiated such as changes in applied vacuum to reduce oxygen concentration and temperature typically do not occur.

Changes in oxygen concentration and temperatures in these collectors are independent of any corrective measures applied and are byproducts of the abiotic exothermic process. CDC observed and recorded significant volumes of fluid, elevated temperatures and high pressures at individual wellheads on the interior LFG extraction collectors installed within the permitted waste boundaries of the landfill because of this process.

As stated previously, temperatures and/or oxygen concentrations in individual collectors appear to decrease or increase based solely on the abiotic exothermic process' residual effects. Specifically, when liquid levels rise in the collectors the temperatures typically diminish with an associated increase in oxygen concentrations. Conversely, when liquid levels recede, temperatures increase and oxygen concentrations diminish.

The table below provides an overview of the exceedances, along with the status of all approved higher operating values (HOV). Additionally, Attachment A, included with this submittal, contains the monitoring data for this collector.

Well ID	Location	Parameter Exceeded	Approved HOVs			Initial Date of Exceedance	ACT Deadline	Pump
			Temp.	O ₂	Pressure			
RW75	West	Oxygen	NONE	NONE	NONE	21-Aug-13	5-Sep-13	Y
RW87	West	Temperature	180°F	NONE	NONE	21-Aug-13	5-Sep-13	Y
WE104	West	Oxygen	NONE	20%	NONE	21-Aug-13	5-Sep-13	N

SUMMARY

CDC understands the intent of 35 IAC 220.250(b) is to reduce the potential for a subsurface oxidation event. However, due to the nature of the abiotic exothermic process, and the requirements of the compliance requirements in Final Consent Order 06 CH 1438, CDC must maintain active extraction on wells to mitigate the reaction generated positive pressure, oversaturation of the LFG, as well as, reduce the potential for and to control odors.

Based on the data evaluations completed as part of this submittal, in accordance with 35 IAC 220.250(c), Congress respectfully requests one-hundred and twenty (120) days from the date of the initial exceedance. This will allow CDC sufficient time to complete the following:

- Continue tuning the collector based on the field conditions present caused by the abiotic exothermic process;
- Allow additional time for pumps installed to reduce liquid levels in the collectors; and
- Allow sufficient time for the abiotic exothermic process to stabilize in the area.

The table below lists the one-hundred and twenty (120) day deadline requested for RW75, RW87, and WE104.

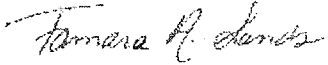
Well ID	Location	Initial Date of Exceedance	120-Day Date
RW75	West	21-Aug-13	19-Dec-13
RW87	West	21-Aug-13	19-Dec-13
WE104	West	21-Aug-13	19-Dec-13

Raymond Pilapil
September 5, 2013
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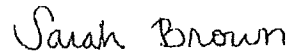
If you have any questions, please contact Mr. Josh McGarry at (708) 544-5195 or me at (630) 633-5827.

Sincerely,

Cornerstone Environmental Group, LLC



Tamara Sands
Project Manager



Sarah Brown
Project Scientist

Attachment A


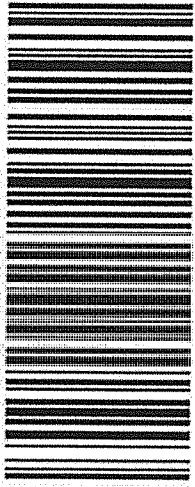

cc: Yasmine Keppner-Bauman – IEPA-BOA – Compliance Section
IEPA-BOA – Collinsville Regional Office

Josh McGarry, Congress
Steve Smith, Republic – electronic copy only
Niki Wuestenberg, Republic – electronic copy only
Cornerstone Project Binder

ATTACHMENT A

Congress Development Company
 Attachment A
 Western 1/3 Collector Exceedances

Well ID	Date	Time	CH ₄ (%)	CO ₂ (%)	O ₂ (%)	Balance (%)	Initial Static Press. (H ₂ O)	Adjusted Static Press. (in. H ₂ O)	Initial Temp. (°F)	Adjusted Temp. (°F)	Comments
CD00RW75	10-Jul-13	13:53:00	1.5	56.3	6.8	35.4	-31.3	-31.2	100	100	Initial Reading ^{6,0000}
CD00RW75	10-Jul-13	13:56:00	2.7	71.2	2.9	23.2	-31.5	-31.4	100	100	Second Reading,Orifice Plate Wellhead,Valve 100% Open ,No Change ,Available Vacuum Fluctuates...
CD00RW75	25-Jul-13	11:32:00	0.5	63.5	4.7	31.3	-28.6	-28.5	70	70	Initial Reading ^{6,0000}
CD00RW75	25-Jul-13	11:34:00	1	77.9	1.5	19.6	-28.5	-28.8	70	70	Second Reading,Orifice Plate Wellhead,Valve 100% Open ,No Change ³⁰⁰
CD00RW75	06-Aug-13	13:45:00	1.1	68.1	3.4	27.4	-30.1	-29.8	95	95	Initial Reading ^{6,0000}
CD00RW75	06-Aug-13	13:48:00	1.8	76.1	1.5	20.6	-29.5	-29.7	95	95	Second Reading,Orifice Plate Wellhead,Valve 100% Open ,No Change ³⁰⁰
CD00RW75	21-Aug-13	14:05:00	0.8	51.1	7.5	40.6	-29.7	-29.8	102	102	Initial Reading ^{6,0000}
CD00RW75	21-Aug-13	14:07:00	1.1	56.5	6.2	36.2	-29.8	-29.8	102	102	Second Reading,Orifice Plate Wellhead,Valve 100% Open ,No Change ,Available Vacuum Fluctuates...
CD00RW87	09-Jul-13	13:27:00	31.4	61.5	0	7.1	-30.9	-30.9	150	150	Initial Reading ^{6,0000}
CD00RW87	09-Jul-13	13:29:00	30.9	63.4	0	5.7	-30.9	-30.8	150	150	Second Reading,No Flow Device ,Valve 100% Open ,No Change ,Available Vacuum Fluctuates...
CD00RW87	26-Jul-13	9:51:00	31.7	65.7	0	2.6	-30.5	-30.6	150	150	Initial Reading ^{6,0000}
CD00RW87	26-Jul-13	9:53:00	31.5	66.3	0	2.2	-30.8	-30.6	150	150	Second Reading,No Flow Device ,Valve 100% Open ,No Change ³⁰⁰
CD00RW87	08-Aug-13	10:55:00	1.1	51.9	6.5	40.5	-30.6	-30.4	122	122	Initial Reading ^{6,0000}
CD00RW87	08-Aug-13	10:57:00	1	52.1	6.7	40.2	-30.2	-30.3	122	122	Second Reading,No Flow Device ,Valve 50% Open ,No Change ³⁰⁰
CD00RW87	21-Aug-13	14:29:00			NM		-29		180		Unable to get gem reading due to highly saturated gas Temp: 180 degrees Pressure -29.0
CD0WE104	09-Jul-13	8:51:00	0	0.4	19.4	80.2	-25.4	-25.4	98	98	Initial Reading ^{6,0000}
CD0WE104	09-Jul-13	8:52:00	0	0.6	19.5	79.9	-25.4	-25.4	98	98	Second Reading,Orifice Plate Wellhead,Valve Barely Open,No Change ,Available Vacuum Fluctuates...
CD0WE104	23-Jul-13	10:33:00	0	0.1	19.2	80.7	-19.8	-20.4	65	65	Initial Reading ^{6,0000}
CD0WE104	23-Jul-13	10:37:00	0	0.1	19.2	80.7	-25.6	-25.6	65	65	Second Reading,Landtec Wellhead,No Change ³⁰⁰
CD0WE104	07-Aug-13	13:38:00	0	0.9	18.7	80.4	-4.7	-4.7	98	98	Initial Reading ^{6,0000}
CD0WE104	07-Aug-13	13:40:00	0	0.3	18.9	80.8	-1.5	-1.5	98	98	Second Reading,Landtec Wellhead,Valve Barely Open,No Change ,Available Vacuum Fluctuates...
CD0WE104	21-Aug-13	7:03:00	0	0.4	20.2	79.4	-1.1	-1.1	70	70	Initial Reading ^{6,0000}
CD0WE104	21-Aug-13	7:05:00	0	0.2	20.2	79.6	-1	-1	70	70	Second Reading,Landtec Wellhead,Valve Barely Open,No Change ,Available Vacuum Fluctuates...
CD0WE104	03-Sep-13	14:09:00	0.1	0.3	20.2	79.4	-13.5	-13.8	90	90	Initial Reading ^{6,0000}
CD0WE104	03-Sep-13	14:12:00	0.1	0.2	20.2	79.5	-13.6	-14.1	90	90	Second Reading,Landtec Wellhead,Valve Barely Open,No Change ,Available Vacuum Fluctuates...

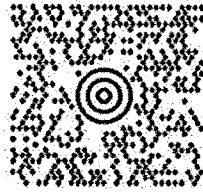
<p>TAMARA SANDS 6306335827 CORNERSTONE ENVIRONMENTAL GROU 802 HONEYWOOD AVENUE ZANESVILLE OH 43701</p> <p>SHIP TO: COMPLIANCE UNIT ILLINOIS EPA, BUREAU OF AIR 1021 NORTH GRAND AVENUE SPRINGFIELD IL 62702-4059</p>	<p>IL 627 0-01</p> 	<p>UPS 2ND DAY AIR</p> <p>TRACKING #: 1Z 4R1 658 02 9038 6300</p> <p>2</p>		<p>BILLING: P/P</p> <p>Reference No. 1: 130028-017</p> <p>UPS 15.6.12. WNTNNSC 42-DA 07/2013</p> 
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FROM:

PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

1 LBS

1 OF 1



IL 601 9-02

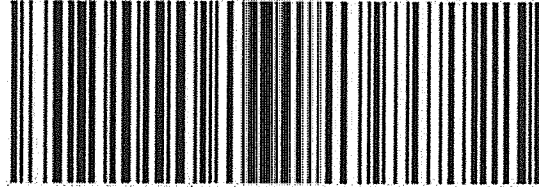


SHIP TO:

AIR REGIONAL FIELD OFFICE
(630) 633-5501
IEPA - DES PLAINES
DIVISION OF AIR POLLUTION CONTROL
9511 WEST HARRISON
DES PLAINES IL 60016

UPS GROUND

TRACKING #: 1Z 26X A15 03 7539 3607



REF 1:130028-017

BILLING: P/P

WS 16.0.31

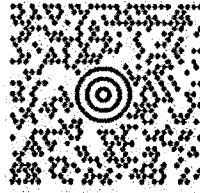
42.0A07/2013

Fold here and place in label pouch

FROM:
PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

1 LBS

1 OF 1



IL 601 9-02

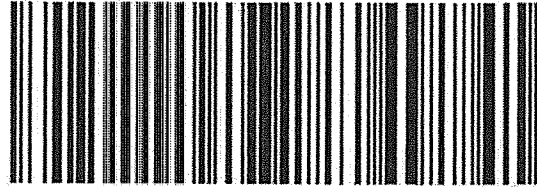


SHIP TO:

JOSHUA MCGARRY
CONGRESS DEVELOP. CO.- HILLSIDE LF
4100 WEST FRONTAGE ROAD
HILLSIDE IL 60162

UPS GROUND

TRACKING #: 1Z 26X A15 03 7492 8611



REF 1:130028-017

BILLING: P/P

WS 18.0.31

42.0A 07/2013

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CORNERSTONE
Environmental Group, LLC

400 Quadrangle Drive, Suite E • Bolingbrook, IL 60440 • (630) 633-5520 • Fax: (630) 378-2640

UPS TRACKING #: 1Z4R16580296738106

September 18, 2013

Raymond Pilapil
Illinois Environmental Protection Agency
Bureau of Air, Compliance Section
1021 North Grand Avenue
P.O. Box 19276
Chicago, Illinois 62794-9276

Re: Congress Development Company - Hillside Landfill
Facility ID No. 031123ABP
Title V – CAAPP Permit No. 95090247
Request for Alternative Compliance Timeline (ACT):
Gas Extraction Collectors: GW72, GW73, RW89, RW92, RW115, PHR05, PHR06,
WS202 and WS203
Project Number 130028-009

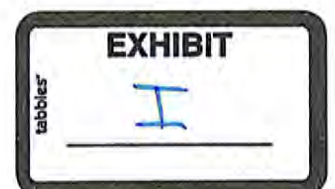
Dear Mr. Pilapil:

Cornerstone Environmental Group, LLC., on behalf of Congress Development Company (CDC) – Hillside Landfill respectfully submits this request for an ACT in accordance with 35 Illinois Administrative Code (IAC) Subpart 220.

Specifically, 35 IAC 220.240(a)(5) requires: *“the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in §60.753 (c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.”*

BACKGROUND

Per the facility’s Title V Clean Air Act Program Permit (CAAPP) condition 7.1.3.c, *“the affected landfill is subject to 35 IAC Part 220, Non-methane Organic Compounds, because construction or modification of the affected landfill commenced before May 30, 1991, and has accepted waste since November 8, 1987, pursuant to 35 IAC 220.200(a).”* Additionally, the facility completed certified closure approved by Illinois Environmental Protection Agency’s (IEPA), Bureau of Land (BOL) on December 31, 2008.



Per the Compliance Schedule set forth in Section V, item 6, of the Final Consent Order 06 CH 1438, Congress was required to achieve compliance with 35 IAC 220 by no later than June 30, 2013. On May 10, 2013, Congress submitted higher operating value (HOV) requests for oxygen, pressure and temperature at individual wellheads to IEPA. IEPA approved the submitted requests on June 25, 2013, and Congress began implementing the approved limits beginning July 1, 2013. The following request details specific deviations from the approved HOV limits and/or exceedances of 35 IAC 220.

Specifically, 35 IAC 220.250(c) requires the facility to *“Operate each interior wellhead in the collection system with a landfill gas temperature less than 55°C (131°F) and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. A higher operating value demonstration that provides supporting data to show that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methagens must be approved by the Agency before such higher operating value may be used.”*

During the September 3rd, 4th, 5th and 6th, 2013, monitoring events, LFG collector CD00RW92 (RW92) experienced elevated temperature greater than or equal to 131 degrees Fahrenheit (°F) and collectors CD00GW072 (GW72), CD00GW0073 (GW73), CD00RW89 (RW89), CD0RW115, (RW115), CD0PHR05 (PHR05), CD0PHR06 (PHR06), CD0WS202 (WS202), and CD0WS203 (WS203) experienced elevated oxygen concentrations greater than 5 percent (%). CDC initiated corrective actions within five (5) days, re-monitored the collectors, but the collectors continued to deviate from regulatory parameters.

Based on historical data, CDC proposes the cause of exceedance is due to an ongoing abiotic exothermic process present within the permitted waste boundaries of the landfill. The by-products of this process include elevated oxygen concentrations, the production of liquids and hydrogen, with associated high positive pressures and high temperatures. Due to the nature of the abiotic exothermic process, the expected typical responses to corrective measures initiated such as changes in applied vacuum to reduce oxygen concentration and temperature typically do not occur.

Changes in oxygen concentration and temperatures in these collectors are independent of any corrective measures applied and are byproducts of the abiotic exothermic process. CDC observed and recorded significant volumes of fluid, elevated temperatures and high pressures at individual wellheads on the interior LFG extraction collectors installed within the permitted waste boundaries of the landfill because of this process.

As stated previously, temperatures and/or oxygen concentrations in individual collectors appear to decrease or increase based solely on the abiotic exothermic process' residual effects. Specifically, when liquid levels rise in the collectors the temperatures typically diminish with an associated increase in oxygen concentrations. Conversely, when liquid levels recede, temperatures increase and oxygen concentrations diminish.

The table below provides an overview of the exceedances, along with the status of all approved higher operating values (HOV). Additionally, Attachment A, included with this submittal, contains the monitoring data for this collector.

Well ID	Location	Parameter Exceeded	Approved HOVs			Initial Date of Exceedance	ACT Deadline	Pump
			Temp.	O ₂	Pressure			
GW72	West	Oxygen	NONE	NONE	NONE	04-Sep-13	19-Sep-13	N
GW73	West	Oxygen	NONE	20%	NONE	06-Sep-13	21-Sep-13	N
RW89	West	Oxygen	NONE	15%	NONE	05-Sep-13	20-Sep-13	N
RW92	West	Temperature	175°F	NONE	NONE	05-Sep-13	20-Sep-13	Y
RW115	West	Oxygen	NONE	NONE	NONE	05-Sep-13	20-Sep-13	N
PHR05	West	Oxygen	NONE	20%	NONE	03-Sep-13	18-Sep-13	N
PHR06	West	Oxygen	NONE	20%	NONE	06-Sep-13	21-Sep-13	N
WS202	West	Oxygen	180°F	NONE	NONE	06-Sep-13	21-Sep-13	N
WS203	West	Oxygen	NONE	20%	NONE	06-Sep-13	21-Sep-13	N

SUMMARY

CDC understands the intent of 35 IAC 220.250(b) is to reduce the potential for a subsurface oxidation event. However, due to the nature of the abiotic exothermic process, and the requirements of the compliance requirements in Final Consent Order 06 CH 1438, CDC must maintain active extraction on wells to mitigate the reaction generated positive pressure, oversaturation of the LFG, as well as, reduce the potential for and to control odors.

Based on the data evaluations completed as part of this submittal, in accordance with 35 IAC 220.250(c), Congress respectfully requests one-hundred and twenty (120) days from the date of the initial exceedance. This will allow CDC sufficient time to complete the following:

- Evaluate collector components (i.e. – valves, boots, casings, Kanaflex hoses, etc.) to determine potential external sources as causes for exceedances
- Replace and install replacement components as identified by additional investigations
- Allow additional time for pumps installed to reduce liquid levels in the collectors; and
- Allow sufficient time for the abiotic exothermic process to stabilize in the area.

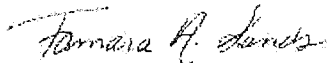
The table below lists the one-hundred and twenty (120) day deadline requested for the each collector identified.

Well ID	Location	Initial Date of Exceedance	120-Day Date
GW72	West	04-Sep-13	02-Jan-14
GW73	West	06-Sep-13	04-Jan-14
RW89	West	05-Sep-13	03-Jan-14
RW92	West	05-Sep-13	03-Jan-14
RW115	West	05-Sep-13	03-Jan-14
PHR05	West	03-Sep-13	01-Jan-14
PHR06	West	06-Sep-13	04-Jan-14
WS202	West	06-Sep-13	04-Jan-14
WS203	West	06-Sep-13	04-Jan-14

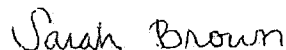
If you have any questions, please contact Mr. Josh McGarry at (708) 544-5195 or me at (630) 633-5827.

Sincerely,

Cornerstone Environmental Group, LLC



Tamara Sands
Project Manager



Sarah Brown
Project Scientist

Attachment A

cc: Yasmine Keppner-Bauman – IEPA-BOA – Compliance Section
IEPA-BOA – Collinsville Regional Office

Josh McGarry, Congress
Steve Smith, Republic – electronic copy only
Niki Wuestenberg, Republic – electronic copy only
Cornerstone Project Binder


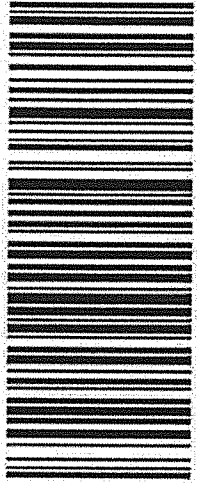

ATTACHMENT A

Congress Development Company - Hillside Landfill
 August - September 2013
 Monitoring Data

Well ID	Date	Time	CH ₄ (%)	CO ₂ (%)	O ₂ (%)	Balance (%)	Initial Static Press. (H ₂ O)	Adjusted Static Press. (in. H ₂ O)	Initial Diff. Press. (in. H ₂ O)	Adjusted Diff. Press. (in. H ₂ O)	Initial Temp. (F)	Adjusted Temp. (F)	Initial Flow (scfm)	Adjusted Flow (scfm)	System Pressure (in. H ₂ O)	Comments
CD00GW72	06-Aug-13	14:50:00	1.9	73.5	1	25.6	-22.6	-22.4	0.039	-0.094	95	95	4	<<->>	-22.85	Initial Reading.....
CD00GW72	06-Aug-13	14:33:00	2.2	76.4	0.4	21	-23.3	-22.3	0.006	-0.096	95	95	1	<<->>	-22.37	Second Reading.No Flow Device, Valve Barely Open.No Change ...
CD00GW72	23-Aug-13	10:56:00	1.6	76	1.2	21.2	-30.5	-30.5	0.197	0.588	98	98	10	17	-29.41	Initial Reading.....
CD00GW72	23-Aug-13	10:57:00	1.7	77.9	0.7	19.7	-30.5	-30.7	0.179	0.483	98	98	9	16	-30.23	Second Reading.No Flow Device, Valve Barely Open.No Change, Available Vacuum Fluctuates....
CD00GW72	04-Sep-13	15:29:00	0.1	18.1	1.5	66.6	-22.3	-22	4.275	4.204	88	88	55	55	-23.39	Initial Reading.....
CD00GW72	04-Sep-13	15:32:00	0.1	13.1	16.4	70.4	-25.5	-24.8	4.507	5.239	88	88	57	62	-24.25	Second Reading.No Flow Device, Valve 25% Open.No Change, Available Vacuum Fluctuates....
CD00GW73	05-Aug-13	15:00:00	2.8	8.7	17.1	71.4	-29.4	-29.6	0.122	0.086	80	80	9	8	-29.68	Initial Reading.....
CD00GW73	23-Aug-13	14:13:00	1.2	3.7	18	75.1	-26.1	-26.1	0.017	0.05	84	84	3	6	-26.2	Second Reading.No Flow Device, Valve Barely Open.No Change, Available Vacuum Fluctuates....
CD00GW73	23-Aug-13	14:14:00	1.2	4.5	18.3	76	-26	-26	0.002	0.009	84	84	1	2	-26.01	Initial Reading.....
CD00GW73	06-Sep-13	13:31:00	0.6	1.5	20.9	77	-25.5	-25.5	-0.001	0.014	90	90	3	3	-25.42	Second Reading.No Flow Device, Valve Barely Open.No Change, Available Vacuum Fluctuates....
CD00GW73	06-Sep-13	13:34:00	1.2	2.7	20.4	75.7	-25.6	-25.6	0.007	0.007	90	90	2	2	-25.59	Initial Reading.....
CD00RW89	05-Sep-13	13:53:00	0.3	16.6	17	66.1	-29.2	-29.3	0.024	0.035	140	140	3	4	-29.35	Second Reading.No Flow Device, Valve 30% Open.No Change, Available Vacuum Fluctuates....
CD00RW92	05-Sep-13	13:07:00			NM		-28.7		0.03	-0.007	140	140	4	<<->>	-29.37	MANUAL READING
CD00PH02	08-Aug-13	11:09:00	0.3	1.1	19.6	79	-31.3	-31.3	-0.078	0.008	80	80	<<->>	5	-31.2	Initial Reading.....
CD00PH02	08-Aug-13	11:13:00	0.2	0.7	19.6	79.5	-31.4	-31.3	0.036	0.007	80	80	11	3	-31.4	Second Reading.No Change, Available Vacuum Fluctuates....
CD00PH02	21-Aug-13	14:47:00	4.9	3.3	17.9	75.9	-29.4	-29.5	0.029	0.055	98	98	10	14	-29.33	Initial Reading.....
CD00PH02	21-Aug-13	14:49:00	6.8	0.7	17.9	74.6	-29.5	-29.6	0.002	0.042	98	98	2	12	-29.69	Second Reading.No Change, Available Vacuum Fluctuates....
CD00PH02	03-Sep-13	14:51:00	1.1	4.3	18.8	75.8	-28.5	-28.6	-0.306	-0.439	84	84	<<->>	<<->>	-28.47	Initial Reading.....
CD00PH02	03-Sep-13	14:53:00	0.2	1	19.9	75.9	-28.5	-28.5	-0.45	0.358	84	84	<<->>	<<->>	-28.61	Second Reading.No Change, Available Vacuum Fluctuates....
CD00PH02	17-Sep-13	11:04:00	4.1	13.1	16.2	66.6	-21.2	-20.5	-0.041	0.38	50	50	<<->>	48	-21.52	Initial Reading.....
CD00PH02	17-Sep-13	11:07:00	2.4	9.9	17.7	70	-21	-21.3	0.708	0.161	50	50	34	25	-21.47	Second Reading.No Change, Available Vacuum Fluctuates....
CD00PH03	08-Aug-13	13:24:00	6.4	2.3	17.8	73.5	-29.4	-31.3	0.066	-0.02	84	84	3	<<->>	-31.3	Initial Reading.....
CD00PH03	08-Aug-13	13:26:00	5.2	2.4	18	74.4	-31.2	-31.2	0.026	-0.006	84	84	2	<<->>	-31.2	Second Reading.No Flow Device, No Change, Available Vacuum Fluctuates....
CD00PH03	21-Aug-13	13:47:00	9.4	4.2	16.1	70.3	-29.7	-29.9	0.021	0.005	98	98	1	0	-29.89	Initial Reading.....
CD00PH03	21-Aug-13	15:49:00	8.8	4	16.2	71	-29.8	-29.8	0.021	0.006	98	98	1	1	-29.93	Second Reading.No Change, Available Vacuum Fluctuates....
CD00PH03	04-Sep-13	11:53:00	4.6	2.1	17.4	75.9	-28.1	-28.1	0.437	0.368	84	84	7	7	-28.19	Initial Reading.....
CD00PH03	17-Sep-13	11:53:00	4.1	5.9	18.4	71.6	-25.3	-25.1	0.001	-0.003	52	52	<<->>	<<->>	-25.42	Second Reading.No Flow Device, No Change, Available Vacuum Fluctuates....
CD00PH03	17-Sep-13	11:18:00	4.6	3.2	18.9	73.3	-25.9	-25.5	-0.027	-0.041	32	32	0	0	-25.56	Onflow Plate Wellhead, Second Reading, Valve Barely Open.No Change ...
CD00RW115	08-Aug-13	14:12:00	0.9	60	3.8	35.3	-30.7	-30.9	0.018	0.058	100	100	0	0	-30.89	Initial Reading.....
CD00RW115	08-Aug-13	14:15:00	1.1	74.8	0.7	23.4	-30.7	-30.7	0.088	-0.025	100	100	0	<<->>	-30.73	Second Reading.No Flow Device, Valve 50% Open, No Change ...
CD00RW115	21-Aug-13	13:55:00	1.3	71.8	2	33	-29.3	-29.1	0.007	0	98	98	0	0	-29.41	Initial Reading.....
CD00RW115	21-Aug-13	13:56:00	0.3	67.8	2.7	28.2	-29.3	-29.3	-0.044	-0.07	98	98	<<->>	<<->>	-29.42	Second Reading.No Flow Device, Valve 25% Open, No Change, Available Vacuum Fluctuates....
CD00RW115	04-Sep-13	11:49:00	1.7	40.6	8.9	49.8	-27.3	-27.3	0.363	0.404	84	84	0	1	-26.28	Initial Reading.....
CD00RW115	04-Sep-13	11:49:00	0.7	38	9.5	31.8	-27.3	-27.2	0.338	0.423	84	84	1	1	-26.16	Second Reading.No Flow Device, Valve 25% Open, No Change, Available Vacuum Fluctuates....
CD00WS202	07-Aug-13	11:05:00	23.4	68.3	2.6	5.7	-31.6	-31.8	0.26	-0.981	100	100	37	<<->>	-34.5	Initial Reading.....
CD00WS202	07-Aug-13	11:05:00	23.2	66.1	2.5	9.2	-31.5	-31.9	2.269	1.613	100	100	84	70	-35.59	Second Reading.No Flow Device, No Change, Available Vacuum Fluctuates....
CD00WS202	20-Aug-13	9:31:00	30.2	66.8	1.2	1.8	-37.9	-37.9	0.03	0.051	88	88	9	12	-37.39	Initial Reading.....
CD00WS202	20-Aug-13	9:33:00	26.9	67.6	1.2	4.3	-37.9	-37.7	0.073	0.02	88	88	14	16	-37.93	Second Reading.No Flow Device, No Change, Available Vacuum Fluctuates....
CD00WS202	03-Sep-13	10:52:00	16.1	41.9	8.9	33.1	-31.6	-31.6	1.172	0.338	82	82	63	34	-35.19	Initial Reading.....

Congress Development Company - Hillside Landfill
 August - September 2013
 Monitoring Data

Well ID	Date	Time	CH ₄ (%)	CO ₂ (%)	O ₂ (%)	Balance (%)	Initial Static Press. (H ₂ O)	Adjusted Static Press. (in. H ₂ O)	Initial Diff. Press. (in. H ₂ O)	Adjusted Diff. Press. (in. H ₂ O)	Initial Temp. (°F)	Adjusted Temp. (°F)	Initial Flow (scfm)	Adjusted Flow (scfm)	System Pressure (in. H ₂ O)	Comments
CDOWS202	05-Sep-13	10:55:00	18	42.4	82	31.4	-35.8	-34.5	0.123	0.217	82	92	20	26	-33.91	Second Reading, No Flow Device, No Change, Available Vacuum Fluctuates...
CDOWS203	07-Aug-13	11:12:00	0	4.2	17.3	78.5	-10.6	-10.4	-0.044	-0.033	100	100	<<<>>	<<<>>	-40.8	Initial Reading...
CDOWS203	07-Aug-13	11:14:00	0	0.8	18.1	81.1	-9.1	-8.8	-0.04	-0.039	100	100	<<<>>	<<<>>	-40.77	Second Reading, Landtec Wellhead Valve Barely Open, No Change, Available Vacuum Fluctuates...
CDOWS203	20-Aug-13	9:44:00	0	1.5	17.3	81.2	-13.8	-14.7	-0.046	-0.013	98	98	<<<>>	<<<>>	-39.97	Initial Reading...
CDOWS203	20-Aug-13	9:47:00	0	0.5	17.4	82.1	-12.9	-12.6	-0.034	-0.032	98	98	<<<>>	<<<>>	-40.19	Second Reading, Landtec Wellhead Valve Barely Open, No Change, Available Vacuum Fluctuates...
CDOWS203	03-Sep-13	11:04:00	0.1	1.3	19.8	78.8	-14.1	-14.5	0.345	0.361	82	82	37	38	-39.36	Initial Reading...
CDOWS203	03-Sep-13	11:06:00	0.1	0.5	20.1	79.3	-13.4	-13.1	0.417	0.372	82	82	41	38	-39.07	Second Reading, Landtec Wellhead Valve Barely Open, No Change, Available Vacuum Fluctuates...

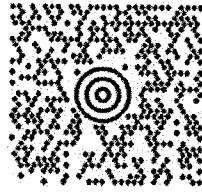
<p>TAMARA SANDS 630-633-5827 CORNERSTONE ENVIRONMENTAL GROU 802 HOMEWOOD AVENUE ZANESVILLE OH 43701</p> <p>SHIP TO: COMPLIANCE UNIT ILLINOIS EPA, BUREAU OF AIR 1021 NORTH GRAND AVENUE SPRINGFIELD IL 62702-4059</p>	<p>IL 627 0-01</p> 	<p>UPS 2ND DAY AIR</p> <p>TRACKING #: 1Z 4R1 658 02 9673 8106</p> <p>2</p>		<p>BILLING: P/P</p> <p>Reference# 1: 130028.017</p> <p>US 15.6.12. WNTW50 42.0A 07/2013</p> 
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FROM:

1 LBS

1 OF 1

PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440



IL 620 0-11

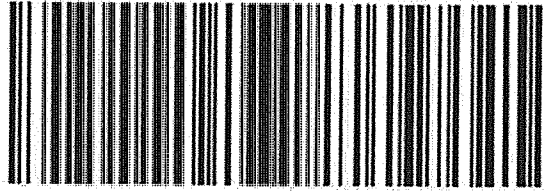


SHIP TO:

REGIONAL OFFICE
(630) 633-5501
IEPA-BOA - COLLINSVILLE, IL
DIVISION OF AIR POLLUTION CONTROL
2009 MALL STREET
COLLINSVILLE IL 62234

UPS GROUND

TRACKING #: 1Z 26X A15 03 7474 5765



REF 1:130028-017

BILLING: P/P

WS 16.0.31

42.0A 07/2013

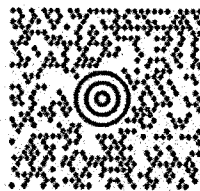
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FROM:

1 LBS

1 OF 1

PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440



IL 601 9-02

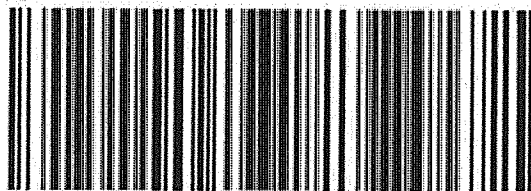


SHIP TO:

JOSHUA MCGARRY
CONGRESS DEVELOP. CO.- HILLSIDE LF
4100 WEST FRONTAGE ROAD
HILLSIDE IL 60162

UPS GROUND

TRACKING #: 1Z 26X A15 03 7553 8371



REF 1:130028-017

BILLING: P/P

WS 16.0.31

42.0A07/2013

Fold here and place in label pouch



CORNERSTONE
Environmental Group, LLC

400 Quadrangle Drive, Suite E • Bolingbrook, IL 60440 • (630) 633-5520 • Fax: (630) 378-2640

VIA UPS TRACKING NUMBER 1Z 13Y 28X NT 9311 7156

September 24, 2013

Raymond Pilapil
Illinois Environmental Protection Agency
Bureau of Air, Compliance Section
1021 North Grand Avenue
P.O. Box 19276
Chicago, Illinois 62794-9276

Re: Congress Development Company - Hillside Landfill
Facility ID No. 031123ABP
Title V – CAAPP Permit No. 95090247
Request for Alternative Compliance Timeline (ACT):
Gas Extraction Collectors: GW17, RW68, PHR17, PHR21, and PHR26
Project Number 130028-009

Dear Mr. Pilapil:

Cornerstone Environmental Group, LLC., on behalf of Congress Development Company (CDC) – Hillside Landfill respectfully submits this request for an ACT in accordance with 35 Illinois Administrative Code (IAC) Subpart 220.

Specifically, 35 IAC 220.240(a)(5) requires: *“the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in §60.753 (c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.”*

BACKGROUND

Per the facility’s Title V Clean Air Act Program Permit (CAAPP) condition 7.1.3.c, *“the affected landfill is subject to 35 IAC Part 220, Non-methane Organic Compounds, because construction or modification of the affected landfill commenced before May 30, 1991, and has accepted waste since November 8, 1987, pursuant to 35 IAC 220.200(a).”* Additionally, the facility completed certified closure approved by Illinois Environmental Protection Agency’s (IEPA), Bureau of Land (BOL) on December 31, 2008.



Per the Compliance Schedule set forth in Section V, item 6, of the Final Consent Order 06 CH 1438, Congress was required to achieve compliance with 35 IAC 220 by no later than June 30, 2013. On May 10, 2013, Congress submitted higher operating value (HOV) requests for oxygen, pressure and temperature at individual wellheads to IEPA. IEPA approved the submitted requests on June 25, 2013, and Congress began implementing the approved limits beginning July 1, 2013. The following request details specific deviations from the approved HOV limits and/or exceedances of 35 IAC 220.

Specifically, 35 IAC 220.250(c) requires the facility to *“Operate each interior wellhead in the collection system with a landfill gas temperature less than 55°C (131°F) and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. A higher operating value demonstration that provides supporting data to show that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methagens must be approved by the Agency before such higher operating value may be used.”*

During the September 9th, 10th, 11th, 12th, and 13th, 2013, monitoring events, LFG collector CD00RW68 (RW68) experienced elevated temperature greater than or equal to 131 degrees Fahrenheit (°F) and collectors CD00GW017 (GW17), CD0PHR17 (PHR17), CD0PHR21 (PHR21), and CD0PHR26 (PHR26), experienced elevated oxygen concentrations greater than 5 percent (%). CDC initiated corrective actions within five (5) days, re-monitored the collectors, but the collectors continued to deviate from limits of regulatory parameters and/or approved higher operating value (HOV) limits.

Based on historical data, CDC proposes the cause of exceedance is due to an ongoing abiotic exothermic process present within the permitted waste boundaries of the landfill. The by-products of this process include elevated oxygen concentrations, the production of liquids and hydrogen, with associated high positive pressures and high temperatures. Due to the nature of the abiotic exothermic process, the expected typical responses to corrective measures initiated such as changes in applied vacuum to reduce oxygen concentration and temperature typically do not occur.

Changes in oxygen concentration and temperatures in these collectors are independent of any corrective measures applied and are byproducts of the abiotic exothermic process. CDC observed and recorded significant volumes of fluid, elevated temperatures and high pressures at individual wellheads on the interior LFG extraction collectors installed within the permitted waste boundaries of the landfill because of this process.

As stated previously, temperatures and/or oxygen concentrations in individual collectors appear to decrease or increase based solely on the abiotic exothermic process' residual effects. Specifically, when liquid levels rise in the collectors the temperatures typically diminish with an associated increase in oxygen concentrations. Conversely, when liquid levels recede, temperatures increase and oxygen concentrations diminish.

The table below provides an overview of the exceedances, along with the status of all approved higher operating values (HOV). Additionally, Attachment A, included with this submittal, contains the monitoring data for this collector.

Well ID	Location	Parameter Exceeded	Approved HOVs			Initial Date of Exceedance	ACT Deadline	Pump
			Temp.	O ₂	Pressure			
GW17	East	Oxygen	NONE	NONE	NONE	13-Sep-13	28-Sep-13	Y
RW68	East	Temp	156°F	NONE	NONE	9-Sep-13	24-Sep-13	N
PHR17	East	Oxygen	NONE	NONE	NONE	12-Sep-13	27-Sep-13	N
PHR21	East	Oxygen	NONE	10%	NONE	10-Sep-13	25-Sep-13	N
PHR26	East	Oxygen	NONE	NONE	NONE	11-Sep-13	26-Sep-13	N

SUMMARY

CDC understands the intent of 35 IAC 220.250(b) is to reduce the potential for a subsurface oxidation event. However, due to the nature of the abiotic exothermic process, and the requirements of the compliance requirements in Final Consent Order 06 CH 1438, CDC must maintain active extraction on wells to mitigate the reaction generated positive pressure, oversaturation of the LFG, as well as, reduce the potential for and to control odors.

Based on the data evaluations completed as part of this submittal, in accordance with 35 IAC 220.250(c), Congress respectfully requests one-hundred and twenty (120) days from the date of the initial exceedance. This will allow CDC sufficient time to complete the following:

- Evaluate collector components (i.e. – valves, boots, casings, Kanaflex hoses, etc.) to determine potential external sources as causes for exceedances
- Replace and install replacement components as identified by additional investigations
- Allow additional time for pumps installed to reduce liquid levels in the collectors; and
- Allow sufficient time for the abiotic exothermic process to stabilize in the area.

Raymond Pilapil
September 24, 2013
Page 4

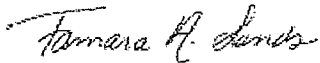
The table below lists the one-hundred and twenty (120) day deadline requested for the each collector identified.

Well ID	Location	Initial Date of Exceedance	120-Day Date
GW17	East	13-Sep-13	11-Jan-14
RW68	East	9-Sep-13	7-Jan-14
PHR17	East	12-Sep-13	10-Jan-14
PHR21	East	10-Sep-13	8-Jan-14
PHR26	East	11-Sep-13	9-Jan-14

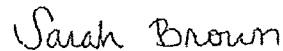
If you have any questions, please contact Mr. Josh McGarry at (708) 544-5195 or me at (630) 633-5827.

Sincerely,

Cornerstone Environmental Group, LLC



Tamara Sands
Project Manager



Sarah Brown
Project Scientist

Attachment A



cc: Yasmine Keppner-Bauman – IEPA-BOA – Compliance Section
IEPA-BOA – Collinsville Regional Office

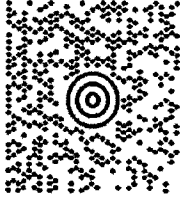

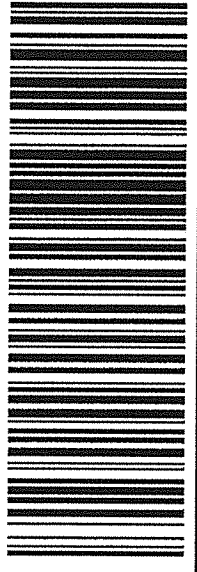

Josh McGarry, Congress
Steve Smith, Republic – electronic copy only
Niki Wuestenberg, Republic – electronic copy only
Cornerstone Project Binder

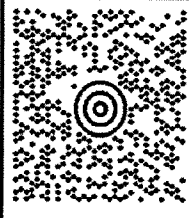

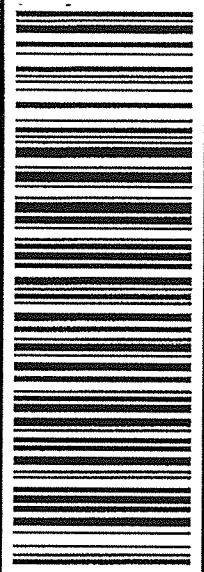

ATTACHMENT A

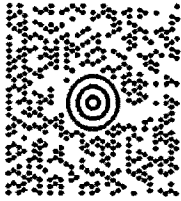

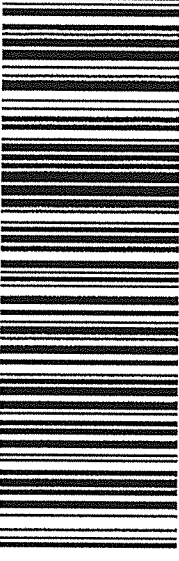

Congress Development Company - Hillside Landfill
 August - September 2013
 Monitoring Data

Well ID	Date	Time	CH ₄ (%)	CO ₂ (%)	O ₂ (%)	Balance (%)	Initial Static Press. (H ₂ O)	Adjusted Static Press. (m. H ₂ O)	Initial Diff. Press. (m. H ₂ O)	Adjusted Diff. Press. (m. H ₂ O)	Initial Temp. (°F)	Adjusted Temp. (°F)	Initial Flow (scfm)	Adjusted Flow (scfm)	System Pressure (m. H ₂ O)	Comments
CD000GW17	03-Aug-13	14:25:00	35.9	43.9	0	0.2	-30.7	-30.6	0.02	0.026	122	122	0	0	-310.75	Initial Reading.....
CD000GW17	02-Aug-13	14:28:00	35.5	43.9	0	0.6	-30.7	-30.7	0.029	0.029	122	122	0	0	-310.66	No Flow Device, Second Reading, Valve 100% Open, No Change....
CD000GW17	15-Aug-13	11:15:00	36.0	42.8	0.1	0.2	-30.1	-30.1	0.045	0.123	115	115	0	0	-310.12	Initial Reading.....
CD000GW17	11-Aug-13	11:18:00	36.4	43.2	0.3	0.1	-30.7	-31.4	-0.182	0.334	115	115	0	0	-310.76	Second Reading, No Flow Device, Valve 100% Open, No Change....
CD000GW17	13-Aug-13	13:46:00	36	43.9	0	0.1	-28.1	-28	0.224	0.191	120	120	0	0	-27.98	Initial Reading.....
CD000GW17	30-Aug-13	13:48:00	35.7	44.2	0	0.1	-27.4	-27.4	0.103	0.047	100	100	0	0	-27.45	Second Reading, No Flow Device, Valve 100% Open, No Change....
CD000GW17	13-Sep-13	11:34:00	31.4	24.9	9	34.7	-24.9	-0.184	-0.302	112	112	0	0	-25.97	Initial Reading.....	
CD000GW17	13-Sep-13	11:37:00	31.5	25	9	34.5	-24.7	-0.294	-0.315	112	112	0	0	-24.6	Second Reading, No Flow Device, Valve 75% Open, Closed Valve 1/2 To 1 Turn, Available Vacuum Fluctuates.....	
CD000WV68	19-Aug-13	15:54:00	16.9	75.4	0	7.7	-4.7	-4.7	0.003	0.013	145	145	2	5	-27.88	Initial Reading.....
CD000WV68	19-Aug-13	15:57:00	16.8	75.7	0	7.5	-4.7	-4.7	0.201	0.2	145	145	23	23	-29.8	Second Reading, Landline, Wellhead, Valve Barely Open, No Change....
CD000WV66	28-Aug-13	13:33:00	26.1	68.7	0	5.2	-4.1	-4.8	0.127	0.113	150	150	19	18	-27.6	Initial Reading.....
CD000WV66	29-Aug-13	13:35:00	25.7	69.6	0	4.7	-4.8	-4.8	0.087	0.08	150	150	15	11	-29.64	Second Reading, Landline, Wellhead, Valve Barely Open, No Change....
CD000WV68	09-Sep-13	10:24:00	11.5	82.3	0.2	6	-3.9	-3.8	0.112	0.104	160	160	17	16	-28.43	Initial Reading.....
CD000WV68	09-Sep-13	10:27:00	11.2	82.3	0	5.5	-3.9	-3.8	0.31	0.091	160	160	28	15	-28.27	Second Reading, Landline, Wellhead, Valve Barely Open, No Change....
CD000WV68	02-Aug-13	14:27:00	17.4	23.1	3.9	35.3	-6.3	-6.3	0.157	0.209	80	80	11	13	-33.84	Initial Reading.....
CD000WV68	02-Aug-13	15:02:00	17.3	22.7	3.9	36.1	-6.2	-6.2	0.177	0.155	80	80	12	11	-33.49	Second Reading, Orifice Plate, Wellhead, Valve Barely Open, No Change....
CD000WV68	13-Aug-13	8:42:00	14.2	20.8	5.3	39.7	-5.4	-5.4	0.185	0.279	80	80	12	15	-32.89	Initial Reading.....
CD000WV68	13-Aug-13	9:45:00	14.3	21	5.2	39.5	-5.4	-4.6	0.152	0.098	80	80	11	9	-33.1	Second Reading, Orifice Plate, Wellhead, Valve Barely Open, Closed Valve 1/2 Turn (or Less)....
CD000WV68	20-Aug-13	11:30:00	14.6	22.8	2.2	61.9	-4.6	-4.6	0.157	0.151	90	90	11	11	-32.47	Initial Reading.....
CD000WV68	20-Aug-13	11:52:00	13.5	22.7	2.2	61.5	-4.6	-4.6	0.137	0.133	90	90	10	10	-32.62	Second Reading, Orifice Plate, Wellhead, Valve Barely Open, No Change....
CD000WV68	12-Sep-13	11:22:00	12.8	19.7	6.7	68.8	-2.5	-2.5	0.029	0.007	69	69	5	7	-30.19	Initial Reading.....
CD000WV68	14-Aug-13	15:21:00	23.7	25.7	4.2	46.4	-4.7	-4.7	0.031	0.043	60	60	5	6	-30.15	Second Reading, Orifice Plate, Wellhead, Valve Barely Open, No Change....
CD000WV68	14-Aug-13	15:24:00	23.7	25.3	4.2	46.8	-4.7	-4.7	0.184	0.156	80	80	27	25	-30.34	Initial Reading.....
CD000WV68	26-Aug-13	14:27:00	28	27.2	2.8	42	-3.3	-3.4	0.001	-0.002	100	100	2	2	-28.52	Second Reading, Landline, Wellhead, Valve Barely Open, No Change....
CD000WV68	26-Aug-13	14:27:00	28	27.1	2.8	42.1	-3.3	-3.3	-0.004	-0.01	100	100	<<<>>	<<<>>	-28.45	Initial Reading.....
CD000WV68	10-Sep-13	14:58:00	3.3	3.7	17.9	75.1	-2.5	-2.5	0.017	0.015	89	89	8	7	-26.77	Second Reading, Landline, Wellhead, Valve Barely Open, No Change....
CD000WV68	10-Sep-13	15:02:00	0.6	0.8	19.8	78.8	-2.5	-2.5	0.015	0.016	89	89	7	7	-27.03	Initial Reading.....
CD000WV68	02-Aug-13	15:57:00	31	24.2	4	49.6	-3.2	-3.2	-0.014	-0.012	90	90	<<<>>	<<<>>	-29.42	Second Reading, Orifice Plate, Wellhead, Valve Barely Open, No Change....
CD000WV68	02-Aug-13	16:01:00	31.2	24.7	4.3	49.8	-3.7	-3.2	-0.021	-0.017	90	90	<<<>>	<<<>>	-29.47	Initial Reading.....
CD000WV68	14-Aug-13	14:42:00	40.2	32.5	0.8	26.5	-2.7	-2.7	-0.018	-0.025	78	78	<<<>>	<<<>>	-30.16	Second Reading, Orifice Plate, Wellhead, Valve Barely Open, No Change....
CD000WV68	14-Aug-13	15:11:00	38.7	29.5	2.3	29.5	-2.6	-2.6	-0.037	-0.044	78	78	<<<>>	<<<>>	-29.36	Initial Reading.....
CD000WV68	15-Aug-13	15:15:00	39.3	30.8	2	27.9	-2.4	-2.4	0.034	0.035	70	70	<<<>>	<<<>>	-29.51	Second Reading, Orifice Plate, Wellhead, Valve Barely Open, No Change....
CD000WV68	26-Aug-13	13:28:00	27.6	21.5	6.8	44.1	-1.9	-1.9	-0.021	-0.024	105	105	<<<>>	<<<>>	-27.58	Initial Reading.....
CD000WV68	26-Aug-13	13:33:00	30.0	24.5	4.9	39.7	-1.9	-1.9	-0.031	-0.03	105	105	<<<>>	<<<>>	-27.82	Second Reading, Orifice Plate, Wellhead, Valve Barely Open, No Change....
CD000WV68	11-Sep-13	11:53:00	28.4	23.2	6.8	42.6	-2.7	-2.7	-0.036	-0.034	100	100	<<<>>	<<<>>	-24.06	Initial Reading.....
CD000WV68	11-Sep-13	11:58:00	7.7	5.6	16.6	70.1	-2.6	-2.6	-0.029	-0.018	100	100	<<<>>	<<<>>	-24.39	Second Reading, Orifice Plate, Wellhead, Valve Barely Open, No Change....

<p>RACHELLE MAXHEIMER 217-502-6442 CORNERSTONE ENVIRONMENTAL GROU 2705 EASTWOOD DRIVE TAYLORVILLE IL 62568</p> <p>SHIP TO: MR. RAYMOND PILAPIL 217-782-2113 IL ENVIRONMENTAL PROTECTION AGENCY 1021 NORTH GRAND AVENUE EAST COMPLIANCE SECTION BUREAU OF AIR SPRINGFIELD IL 62702-4059</p>	<p>0.0 LBS LTR 1 OF 1</p> <p>IL 627 0-01</p> 	<p>UPS NEXT DAY AIR</p> <p>TRACKING #: 1Z 13Y 28X NT 9311 7156</p> <p>1</p>		<p>BILLING: P/P ATTENTION UPS DRIVER: SHIPPER RELEASE</p> <p>Reference#1: 130028-009</p> <p>US 15.6.12. WWTZ59 42.0A 07/2013</p> 
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<p>RACHELLE MAXHEIMER 217-502-6442 CORNERSTONE ENVIRONMENTAL GROU 2705 EASTWOOD DRIVE TAYLORVILLE IL 62568</p> <p>0.0 LBS LTR 1 OF 1</p> <p>SHIP TO: MS. YASMINE KEPPNER IL ENVIRONMENTAL PROTECTION AGENCY 1021 NORTH GRAND AVENUE EAST COMPLIANCE SECTION (MC 40) BUREAU OF AIR SPRINGFIELD IL 62702-4059</p>	 <p>IL 627 0-01</p> 	<p>UPS NEXT DAY AIR SAVER 1P</p> <p>TRACKING #: 1Z 13Y 28X NW 9198 4360</p>		<p>BILLING: P/P ATTENTION UPS DRIVER: SHIPPER RELEASE</p> <p>Reference#1: 130028</p> <p>US 156.12. WYTHE90 42-DA 07/2013</p> 
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<p>RACHELLE MAXHEIMER 217-502-6442 CORNERSTONE ENVIRONMENTAL GROU 2705 EASTWOOD DRIVE TAYLORVILLE IL 62568</p>	<p>0.0 LBS LTR 1 OF 1</p>
<p>SHIP TO: DIVISION OF AIR POLLTION CTRL. 217-782-2113 IEPA 2009 MALL STREET COLLINSVILLE IL 62234-1832</p>	
	<p>IL 620 0-11</p> 
<p>UPS 2ND DAY AIR TRACKING #: 1Z 13Y 28X NY 9479 6975 2</p>	
	
<p>BILLING: P/P ATTENTION UPS DRIVER: SHIPPER RELEASE</p> <p>Reference#: 130028-017</p> <p>US 15.6.12. WNT1E90-42.DA 07/2013</p> 	

<p>RACHELLE MAXHEIMER 217-502-6442 CORNERSTONE ENVIRONMENTAL GROU 2705 EASTWOOD DRIVE TAYLORVILLE IL 62568</p> <p>SHIP TO: JOSHUA MCGARRY CONGRESS DEVELOP. CO. - HILLSIDE LF 4100 WEST FRONTAGE ROAD HILLSIDE IL 60162-1764</p>	<p>0.0 LBS LTR 1 OF 1</p>
 <p>IL 601 9-02</p> 	<p>UPS 2ND DAY AIR</p> <p>TRACKING #: 1Z 13Y 28X NY 9155 0986</p> <p>2</p> 
<p>BILLING: P/P ATTENTION UPS DRIVER: SHIPPER RELEASE</p> <p>Reference#1: 130028-017</p> <p>US 15.6.12. WNTPE90 42.0A 07/2013</p> 	



CORNERSTONE

Environmental Group, LLC

400 Quadrangle Drive, Suite E • Bolingbrook, IL 60440 • (630) 633-5520 • Fax: (630) 378-2640

VIA UPS TRACKING NUMBER 1Z 26X A15 01 7513 0402

October 3, 2013

Raymond Pilapil
Illinois Environmental Protection Agency
Bureau of Air, Compliance Section
1021 North Grand Avenue
P.O. Box 19276
Chicago, Illinois 62794-9276

Re: Congress Development Company - Hillside Landfill
Facility ID No. 031123ABP
Title V – CAAPP Permit No. 95090247
Request for Alternative Compliance Timeline (ACT):
Gas Extraction Collectors: GW54, RW75, RW87, GW100, RW102, and RW116
Project Number 130028-009

Dear Mr. Pilapil:

Cornerstone Environmental Group, LLC., on behalf of Congress Development Company (CDC) – Hillside Landfill respectfully submits this request for an ACT in accordance with 35 Illinois Administrative Code (IAC) Subpart 220.

Specifically, 35 IAC 220.240(a)(5) requires: *“the owner or operator shall monitor each well monthly for temperature and nitrogen or oxygen as provided in §60.753 (c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Administrator for approval.”*

BACKGROUND

Per the facility’s Title V Clean Air Act Program Permit (CAAPP) condition 7.1.3.c, *“the affected landfill is subject to 35 IAC Part 220, Non-methane Organic Compounds, because construction or modification of the affected landfill commenced before May 30, 1991, and has accepted waste since November 8, 1987, pursuant to 35 IAC 220.200(a).”* Additionally, the facility completed certified closure approved by Illinois Environmental Protection Agency’s (IEPA), Bureau of Land (BOL) on December 31, 2008.



On May 10, 2013, Congress submitted higher operating value (HOV) requests for oxygen, pressure and temperature at individual wellheads to IEPA. IEPA approved the submitted requests on June 25, 2013, and Congress began implementing the approved limits beginning July 1, 2013. The facility also submitted an amended GCCS Design Plan to address well exceedances that were not included in the June 25, 2013 approval letter and the site is awaiting final approval of such. In the interim, CDC has experienced exceedances above the operational requirements and is requesting an alternative timeline. The following request details specific exceedances from the approved HOV limits and/or operational requirements of 35 IAC 220.

Temperature and Oxygen

During the September 18th, 19th, and 20th, 2013, monitoring events, LFG collectors CD00GW54 (GW54), CD00RW87 (RW87), CD0RW102 (RW102), and CD0RW116 (RW116) experienced elevated temperature greater than or equal to 131 degrees Fahrenheit (°F) or greater than the approved higher operative value (HOV) limit established for the collector, collectors CD00RW75 (RW75) experienced elevated oxygen concentrations greater than 5 percent (%), and CD0GW100 (GW100) exhibited an elevated oxygen concentrations. CDC initiated corrective actions within five (5) days that included the following:

CDC initiated corrective actions within five (5) days that included the following:

- Tuning the collector and surrounding collectors;
- Inspecting each collector for the presence of integrity issues with the collector components;
- Adjusting pumping rates for installed pumps as field conditions allowed;

CDC continues to make corrective actions and has re-monitored the collectors, but the collectors continue to exhibit elevated readings above the regulatory limits and/or approved higher operating value (HOV) limits for oxygen and temperature.

Additionally, CDC installed a geomembrane synthetic liner over the entire 55-acre permitted waste footprint and placed additional cover soils beyond the normal three (3) feet of compacted clay and one (1) foot of vegetative layer. As presented in the May 10, 2013, HOV request, CDC placed additional soil cover depths ranging from twenty-five (25) to fifty-five (55) feet on the western one-third of the facility, and additional soil cover placed over the eastern two-thirds of the facility range from five (5) to twenty (20) feet. Therefore, with the type of cover and the depth of soil cover at the facility, CDC presents the elevated temperature and oxygen concentrations are not related to air intrusion into the gas collection system.

The table below provides an overview of the exceedances, along with the status of all approved higher operating values (HOV). Additionally, Attachment A, included with this submittal, contains the monitoring data for these collectors.

Well ID	Location	Parameter Exceeded	Reading Recorded	Approved HOVs			Initial Date of Exceedance	ACT Deadline	Pump
				Temp.	O ₂	Pressure			
GW54	West	Temp	180°F	175°F	NONE	NONE	19-Sep-13	4-Oct-13	N
RW75	West	Oxygen	6.6	NONE	NONE	NONE	19-Sep-13	4-Oct-13	Y
RW87	West	Temp	182°F	175°F	NONE	NONE	20-Sep-13	5-Oct-13	Y
GW100	West	Oxygen	7.7	175°F	NONE	NONE	19-Sep-13	4-Oct-13	Y
RW102	West	Temp	140°F	NONE	NONE	NONE	19-Sep-13	4-Oct-13	Y
RW116	West	Temp	180°F	180°F	NONE	NONE	18-Sep-13	3-Oct-13	Y

SUMMARY

CDC has initiated the required five (5) day corrective actions in accordance with 220.240(a)(3) and (a)(5), and continues to perform corrective actions. Therefore, CDC has satisfied the requirements per 35 IAC 220.250(g), *“If monitoring demonstrates that the operational requirements in subsection (b), (c), or (d) of this Section are not met, take corrective action as specified in Section 220.240(a)(3), (a)(5), or (c)(4) of this Subpart. If such corrective actions are taken as specified in Section 220.240(a)(3), (a)(5), or (c)(4) of this Subpart, the monitored exceedance is not a violation of the operational requirements in this Section.”*

Based on the data evaluations completed as part of this submittal, in accordance with 35 IAC 220.250(c), Congress respectfully requests one-hundred and twenty (120) days from the date of the initial exceedance. This will allow CDC sufficient time to continue completing the following corrective action efforts:

- Evaluate collector components (i.e. – valves, boots, casings, Kanaflex hoses, etc.) to determine potential external sources as causes for exceedances
- Replace and install replacement components as identified by additional investigations
- Allow additional time to obtain additional or replacement pumps;
- Allow sufficient time for currently installed pumps to reduce liquid levels in the collectors; and
- Allow sufficient time for the abiotic exothermic process to stabilize in the area.

The table below lists the one-hundred and twenty (120) day deadline requested for the each collector identified.

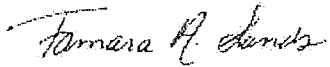
Well ID	Location	Initial Date of Exceedance	120-Day Date
GW54	West	19-Sep-13	17-Jan-14
GW100	West	19-Sep-13	17-Jan-14
RW75	West	19-Sep-13	17-Jan-14
RW87	West	20-Sep-13	18-Jan-14
RW102	West	19-Sep-13	17-Jan-14
RW116	West	18-Sep-13	16-Jan-14

Raymond Pilapil
October 3, 2013
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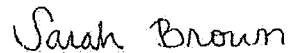
If you have any questions, please contact Mr. Josh McGarry at (708) 544-5195 or me at (630) 633-5827.

Sincerely,

Cornerstone Environmental Group, LLC



Tamara Sands
Project Manager



Sarah Brown
Project Scientist

Attachment A

cc: Yasmine Keppner-Bauman – IEPA-BOA – Compliance Section
IEPA-BOA – Collinsville Regional Office

Josh McGarry, Congress
Steve Smith, Republic – electronic copy only
Niki Wuestenberg, Republic – electronic copy only
Cornerstone Project Binder

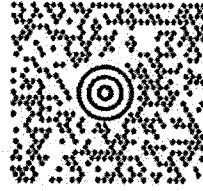
ATTACHMENT A

Congress Development Company - Hillside Landfill
 September - October 2013
 Monitoring Data

Well ID	Date	Time	CH ₄ (%)	CO ₂ (%)	O ₂ (%)	Balance (%)	Initial Static Press. (H ₂ O)	Adjusted Static Press. (in. H ₂ O)	Initial Diff. Press. (in. H ₂ O)	Adjusted Diff. Press. (in. H ₂ O)	Initial Temp. (°F)	Adjusted Temp. (°F)	Initial Flow (scfm)	Adjusted Flow (scfm)	System Pressure (in. H ₂ O)	Comments
CD06CW34	19-Sep-13				NNM		-21.9	-29.2	0.093	0.102	92	92	7	7	-29.24	MANUAL READING; Gas is not annotated for GEM to be used
CD06RW75	05-Sep-13	14:03:00	1.2	63.9	4.8	30.1	-29.2	-29.2	0.112	-0.089	92	92	8	<<>>	-29.37	Initial Reading;..... Second Reading;Orifice Plate Wellhead Valve 100% Open, No Change, Available Vacuum Fluorometer,.....
CD06RW75	05-Sep-13	14:06:00	1.3	62.5	4.9	31.3	-29.2	-29.3	0.112	-0.089	92	92	8	<<>>	-29.37	Initial Reading;..... Second Reading;Orifice Plate Wellhead Valve 100% Open, No Change, Available Vacuum Fluorometer,.....
CD06RW75	19-Sep-13	14:35:00	0.7	56.2	6.4	36.7	-27.4	-27.4	0.226	0.066	98	98	11	5	-27.64	Initial Reading;..... Second Reading;Orifice Plate Wellhead Valve 75% Open, Closed Valve > 1 Turn, Available Vacuum Fluorometer,.....
CD06RW75	19-Sep-13	14:39:00	0.9	55.3	6.6	37.2	-27.3	-27.4	0.212	0.109	98	98	11	8	-27.42	Initial Reading;..... Second Reading;Orifice Plate Wellhead Valve 80% Open, No Change, Available Vacuum Fluorometer,.....
CD06RW75	02-Oct-13	14:05:00	0.6	52.6	6.9	39.9	-25.2	-25.3	0.395	0.463	98	98	15	16	-25.3	Initial Reading;..... Second Reading;Orifice Plate Wellhead Valve 80% Open, No Change, Available Vacuum Fluorometer,.....
CD06RW75	02-Oct-13	14:08:00	0.5	52.9	6.9	39.7	-25.2	-25.1	0.347	0.525	98	98	14	17	-25.23	Initial Reading;..... Second Reading;Orifice Plate Wellhead Valve 80% Open, No Change, Available Vacuum Fluorometer,.....
CD06RW87	05-Sep-13	14:28:00	30.7	65.4	0	5.9	-28.8	-28.6	-0.233	0.195	150	150	0	0	-28.9	Initial Reading;..... Second Reading;No Flow Device Valve 100% Open, No Change, Available Vacuum Fluorometer,.....
CD06RW87	05-Sep-13	14:30:00	30.9	63.5	0	5.6	-28.7	-28.4	0.109	-0.26	150	150	0	0	-28.97	Initial Reading;..... MANUAL READING; Gas is not annotated for GEM to be used
CD06RW87	20-Sep-13				NNM		-28.5				182					Initial Reading;.....
CD06GW100	05-Sep-13	10:33:00	4.7	77.2	0	18.1	-25	-24.9	0.032	-0.016	162	162	4	<<>>	-24.63	Initial Reading;..... Second Reading;No Flow Device Valve 75% Open, No Change, Available Vacuum Fluorometer,.....
CD06GW100	05-Sep-13	10:35:00	4.8	76	0	17.2	-24.8	-24.7	0.16	-0.109	162	162	8	<<>>	-24.9	Initial Reading;..... MANUAL READING; Gas is not annotated for GEM to be used
CD06GW100	19-Sep-13				NNM		-27.2				180					Initial Reading;.....
CD06GW100	01-Oct-13	10:43:00	2.4	48.3	7.8	41.5	-24.9	-24.7	0.169	0.237	138	138	10	12	-24.98	Initial Reading;..... Second Reading;No Flow Device Valve 75% Open, No Change, Available Vacuum Fluorometer,.....
CD06GW100	01-Oct-13	10:45:00	2.4	49.1	7.7	46.8	-24.9	-24.7	0.199	0.255	138	138	10	12	-25.3	Initial Reading;..... Second Reading;No Flow Device Valve 75% Open, No Change, Available Vacuum Fluorometer,.....
CD06RW102	05-Sep-13	11:23:00	1.1	73.9	0.2	24.8	-21.2	-22.2	-0.166	0.066	120	120	<<>>	1	-26.57	Initial Reading;..... Second Reading;Orifice Plate Wellhead Valve Barely Open, No Change, Available Vacuum Fluorometer,.....
CD06RW102	05-Sep-13	11:25:00	1.1	74.6	0.1	24.2	-23.5	-22.9	0.013	-0.258	120	120	2	<<>>	-27.77	Initial Reading;..... Second Reading;Orifice Plate Wellhead Valve Barely Open, No Change, Available Vacuum Fluorometer,.....
CD06RW102	19-Sep-13	11:43:00	2.4	74.6	0.5	25.5	-20	-20.5	0.015	0.033	158	158	2	4	-27.44	Initial Reading;..... Second Reading;Orifice Plate Wellhead Valve Barely Open, No Change, Available Vacuum Fluorometer,.....
CD06RW102	19-Sep-13	11:46:00	2.9	74.3	0.4	24.4	-21	-20.7	0.12	-0.083	158	158	7	<<>>	-27.15	Initial Reading;..... Second Reading;Orifice Plate Wellhead Valve Barely Open, No Change, Available Vacuum Fluorometer,.....
CD06RW102	01-Oct-13	11:15:00	1	71.2	1.5	26.3	-21.7	-21.5	0.094	0.013	140	140	7	2	-28.07	Initial Reading;..... Second Reading;Orifice Plate Wellhead Valve Barely Open, No Change, Available Vacuum Fluorometer,.....
CD06RW102	01-Oct-13	11:20:00	1.1	72	1.5	25.4	-21.5	-21.5	0.251	0.323	140	140	11	13	-26.68	Initial Reading;..... MANUAL READING; Gas is not annotated for GEM to be used
CD06RW116	05-Sep-13				NNM		-28				180					Initial Reading;.....
CD06RW116	18-Sep-13				NNM		-23.9				190					Initial Reading;..... MANUAL READING; Gas is not annotated for GEM to be used

FROM:
PATTY SCHULTZ
(630) 633-5520
CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 627 0-01



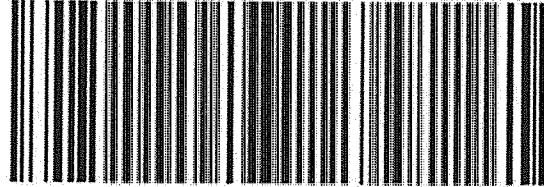
SHIP TO:

MR. RAYMOND PILAPIL
(630) 633-5501
IEPA - BOA - SPRINGFIELD, IL
BUREAU OF AIR COMPLIANCE SECTION
1021 NORTH GRAND AVENUE
SPRINGFIELD IL 62702-4059

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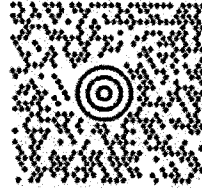
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WS 16.0.31 42.0A 07/2013

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PATTY SCHULTZ
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CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 627 0-01



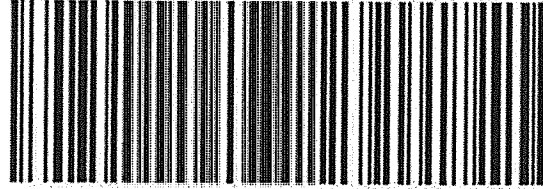
SHIP TO:

YASMINE KEPPNER-BAUMAN
(630) 633-5501
IEPA-BOA - Y. KEPPNER-BAUMAN
AIR COMPLIANCE SECTION
1021 NORTH GRAND AVENUE EAST
SPRINGFIELD IL 62702-4059

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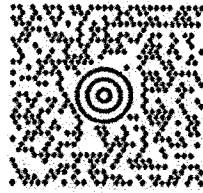
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CORNERSTONE ENVIRONMENTAL GROU
400 QUADRANGLE DRIVE, STE E
BOLINGBROOK IL 60440

LTR 1 OF 1



IL 620 0-11



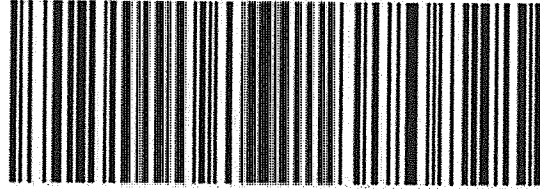
SHIP TO:

REGIONAL OFFICE
(630) 633-5501
IEPA-BOA - COLLINSVILLE, IL
DIVISION OF AIR POLLUTION CONTROL
2009 MALL STREET
COLLINSVILLE IL 62234

UPS NEXT DAY AIR

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REF 1:130028.017

BILLING: P/P

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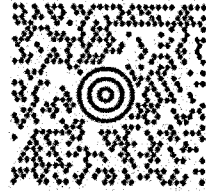
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FROM:

1 LBS

1 OF 1

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BOLINGBROOK IL 60440



IL 601 9-02

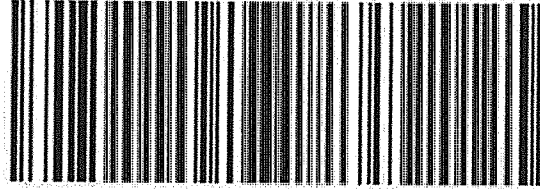


SHIP TO:

JOSHUA MCGARRY
CONGRESS DEVELOP. CO.- HILLSIDE LF
4100 WEST FRONTAGE ROAD
HILLSIDE IL 60162

UPS GROUND

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