



Illinois Environmental Protection Agency

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JB Pritzker, Governor

James Jennings, Director

217-524-3301

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RETURN RECEIPT REQUESTED

9589 0710 5270 3788 8824 21

JUL 15 2026

Owner

Fox Metro Water Reclamation District
Attn: Karen K. Clementi
682 State Route 31
Oswego, Illinois 60543

Operator

Avaya, Inc.
Attn: Gwendolyn Faino
350 Mt. Kemble Road
Morristown, New Jersey 07960

Re: 0934690001 -- Kendall County
Avaya Inc. Montgomery Remediation Site
ILD056625858
Log No. B-175R2
RCRA Permit – 24A
Permit Draft

Dear Mses. Clementi and Faino:

Attached are a draft Resource Conservation and Recovery Act (RCRA) Remedial Action Plan Permit (RAPP) and fact sheet for the above-referenced facility. This draft RAPP decision is based on Illinois EPA's administrative record files. The contents of the administrative record are described in Title 35 Illinois Administrative Code (35 IAC) 703.303(c)(2).

In accordance with 35 IAC 703.303, the draft RAPP and administrative record must be publicly noticed and made available for review and comment. Illinois EPA must also provide an opportunity for a public hearing. Copies of the draft RAPP, fact sheet, and RAPP application are available for review by contacting Illinois EPA. A public hearing has not been scheduled, but any interested party may request a public hearing.

During the public comment period, the applicant or any interested party may submit comments to Illinois EPA on the draft RAPP. At the close of the comment period, Illinois EPA will prepare a response to significant comments. Comments on the draft RAPP may be submitted to:

2125 S. First Street, Champaign, IL 61820 • 217-278-5800
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 • 618-346-5120
595 S. State Street, Elgin, IL 60123 • 847-608-3131
412 SW Washington Street, Suite D, Peoria, IL 61602 • 309-671-3022

115 S. LaSalle Street, Suite 2203, Chicago, IL 60603 • 312-832-0028
9511 Harrison Street, Des Plaines, IL 60016 • 847-294-4000
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0934690001 – Avaya Inc.
Log No. B-175R2 (Draft)
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Illinois Environmental Protection Agency
Office of Community Relations – #5
Attn: Sarah Brubaker
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

The public comment period will close on September 3, 2026. Illinois EPA will issue a final RAPP after the close of the public comment period unless Illinois EPA decides to reverse this tentative decision. The appeal process and limitations are addressed in 35 IAC 705.212.

Any questions regarding groundwater related issues should be directed to Emma Labudde by phone at (217)-786-0749 or by email at Emma.Labudde@illinois.gov. For all other questions regarding this permit, please contact Benjamin Dobbins by email at Benjamin.Dobbins@Illinois.gov or by phone at (217)-524-5027.

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua L. Rhoades for JLR".

Joshua L. Rhoades, P.G.
Permit Section Manager
Bureau of Land

Attachments: Fact Sheet
Draft RCRA RAPP

JLR:BCD: 0934690001-RCRA-B175R2-Draft.docx

BCD TNH ENL AMB

Cc: Craig Cabrera, WSP Global
Karen K. Clementi, Fox Metro Water Reclamation District
Gwendolyn Faino, Avaya Inc.
Emily Keener, USEPA Region V

Fact Sheet
Draft RCRA Remedial Action Plan Permit
Avaya Inc. Montgomery Site
800 South River Street
Montgomery, Illinois
Illinois EPA ID No. 0934690001
U.S. EPA ID No. ILD056625858
Log No. B-175R2

I. INTRODUCTION

This fact sheet has been prepared in accordance with the requirements of Title 35 Illinois Administrative Code (35 IAC) 703.303(b). This fact sheet is intended to be a summary of the principal facts and significant factual, legal, methodological, and policy questions considered in preparing a draft Resource Conservation and Recovery Act (RCRA) Remedial Action Plan Permit (draft RAPP).

II. DESCRIPTION OF FACILITY

The facility is owned by:

Fox Metro Water Reclamation District
682 State Route 31
Oswego, Illinois 60543

The facility is operated by:

Avaya Inc.
350 Mt. Kemble Road
Morristown, New Jersey 07960

The Avaya site is an inactive lot located within the City of Montgomery, adjacent to the Fox River in Kendall County. The site address is 800 South River Street, Montgomery, Illinois, 60538. Originally a wallpaper production factory, AT&T and its subsequent spin-offs (Lucent Technologies and Avaya) acquired the property in 1955. Avaya sold the property to Avalon Development in 2007, which then sold the property to the Fox Metro Water Reclamation District in 2018. Avaya is the operator and Fox Metro Water Reclamation District is the current owner of the lot. The lot is separated into two parcels: North Parcel (33.64 acres) and South Parcel (11.87 acres).

Between 1956 and 1990, electronic components and metal piece parts for telecommunications equipment were the main products manufactured at the property. From 1990, printed circuit boards were the only products produced until October 1995, when all production ceased at the property. All onsite buildings were razed in late 1997 and early 1998 by Lucent Technologies.

Between 1963 and 1975, trichloroethylene (TCE) was used in cleaning operations and metal degreasing. In 1975 TCE was replaced with 1,1,1-trichloroethane (1,1,1-TCA). Methylene chloride was used from 1979 to 1991 for select circuit board production operations. Freon was eliminated from the assembled circuit board cleaning in 1990 and replaced with EC-7, a citrus based cleaner. As a result of its manufacturing operations, the facilities previously located here were large-quantity generators of listed hazardous wastes (F001, F005, and F006) and characteristically hazardous wastes (D006, D007, and D008).

Corrective Action Management Unit (CAMU) under RAPP

A CAMU is defined in 35 IAC as "... an area within a facility that is designated by the Agency pursuant to Subpart S of 35 Ill. Adm. Code 724 for the purpose of implementing corrective action requirements pursuant to 35 Ill. Adm. Code 724.201 and RCRA section 3008(h) (42 USC 6928(h)). A CAMU must only be used for the management of remediation wastes pursuant to implementing such corrective action requirements at the facility."

The initial RAPP to the facility for construction and operation of a CAMU for the remediation wastes from the voluntary facility-wide cleanup under Illinois EPA's Site Remediation program (SRP) was issued on October 10, 2000 (Log No. B-175; effective on November 14, 2000). Some remediation waste, excavated from various locations within the Northern and Southern Parcels, was combined with the bed ash, heated in a rotary kiln prior to placing in the on-site CAMU. See Section III below for further detail on the CAMU related activities.

A layout map of the facility is provided as an attachment to this fact sheet.

III. HAZARDOUS WASTE MANAGEMENT ACTIVITIES

This draft RAPP, if issued, is a second renewed RAPP, which authorizes Avaya Inc. to continue maintaining the CAMU with approximately 25,000 cubic yards of remediation waste and conduct groundwater monitoring. The primary constituents of the remediation waste placed within the CAMU were lead, barium, cadmium, chromium, and zinc. In addition to the previous constituents, halogenated and non-halogenated solvents listed under F001 and F005, such as dichloroethane isomers, trichloroethane isomers, vinyl chloride, and spent solvents containing ten percent or more (by volume) of halogenated or non-halogenated constituents, are found within the groundwater. These constituent concentrations found in groundwater monitoring wells within the Avaya facility are measured to be above the groundwater protection standard. Therefore, a groundwater monitoring program meeting the requirements of 35 IAC 724, Subpart F must be implemented at the Avaya facility. The groundwater monitoring program consists of two upgradient monitoring wells and eight downgradient wells.

The facility monitors groundwater in the uppermost aquifer, identified as the shallow Cahokia Alluvium and Henry Formation, extending down to the Maquoketa Group bedrock. The Cahokia Alluvium consists of poorly sorted sand, silt, and clay and the Henry Formation consists of well-sorted sand and gravel with minor interbedded silt and clay. The onsite groundwater is designated as Class I: Potable Resource Groundwater.

Due to continued exceedances in groundwater at the facility, the draft permit requires a work plan for the Facility to delineate and determine the source of groundwater contamination, evaluate the adequacy of the groundwater monitoring well network, provide an adequate map that represents current conditions of the site, and provide historical groundwater analytical data in electronic format to the Illinois EPA.

The facility is required to monitor and test groundwater semi-annually for volatile organic compounds (VOCs), other organic compounds, and inorganic constituents. With the issuance of the draft permit, the monitoring list includes additional constituents to ensure the monitoring program remains protective of human health and the environment.

Since this RCRA permit is a RAPP originated from remediation activities under a SRP cleanup project for constructing and operation of CAMU only, no RCRA corrective action activities are required for the site. Currently, the responsibilities of the owner and operator are to monitor groundwater constituent concentrations, and to inspect and maintain the integrity of the CAMU and asphalt cap. The inspection and maintenance of the CAMU and final asphalt cap includes, but is not limited to, resealing any cracks that may form for any reason, removing any vegetation that grows on the asphalt cap's surface, and checking the structure for settling. They are to perform these duties for at least 30 years after being certified closed on June 13, 2006 (Log No. B-175-M-2). Under this draft RAPP, the Permittee is also required to provide a cost estimate for 30-year of post-closure care of the CAMU for the purpose of providing and maintaining the total amount for financial assurance throughout the post-closure care period.

A map of the Parcels and CAMU are attached to this fact sheet.

IV. PERMITS CONSIDERED OTHER THAN RCRA

Illinois EPA SRP

Illinois EPA SRP does not require any permits for the activities required by the draft RAPP.

Illinois EPA Bureau of Air

The Bureau of Air does not require any permits for the activities required by the draft RAPP.

Illinois EPA Bureau of Water

The Bureau of Water does not require any permits for the activities required by the draft RAPP.

U.S. EPA

The USEPA does not require any permits for the activities required by the draft RAPP.

V. PROCEDURES FOR REACHING A FINAL DECISION

In accordance with 703.303(d)(2), the public has 45 days to review the application and draft RAPP and to provide comments on the draft RAPP conditions prior to Illinois EPA taking any final permitting action on the application. The comment period will begin on July 20, 2026, the date of the first publication of the public notice in a newspaper of general circulation in the area. The comment period will end on September 3, 2026.

The administrative record contains the RAPP application, draft RAPP, fact sheet, and other supporting documents and correspondence submitted to Illinois EPA. The administrative record is available for public inspection by appointment only at Illinois EPA's Springfield headquarters from 8:30 am to 5:00 pm, Monday through Friday. Any interested person may submit written comments on the draft RAPP, request a public hearing, or review the administrative record by contacting:

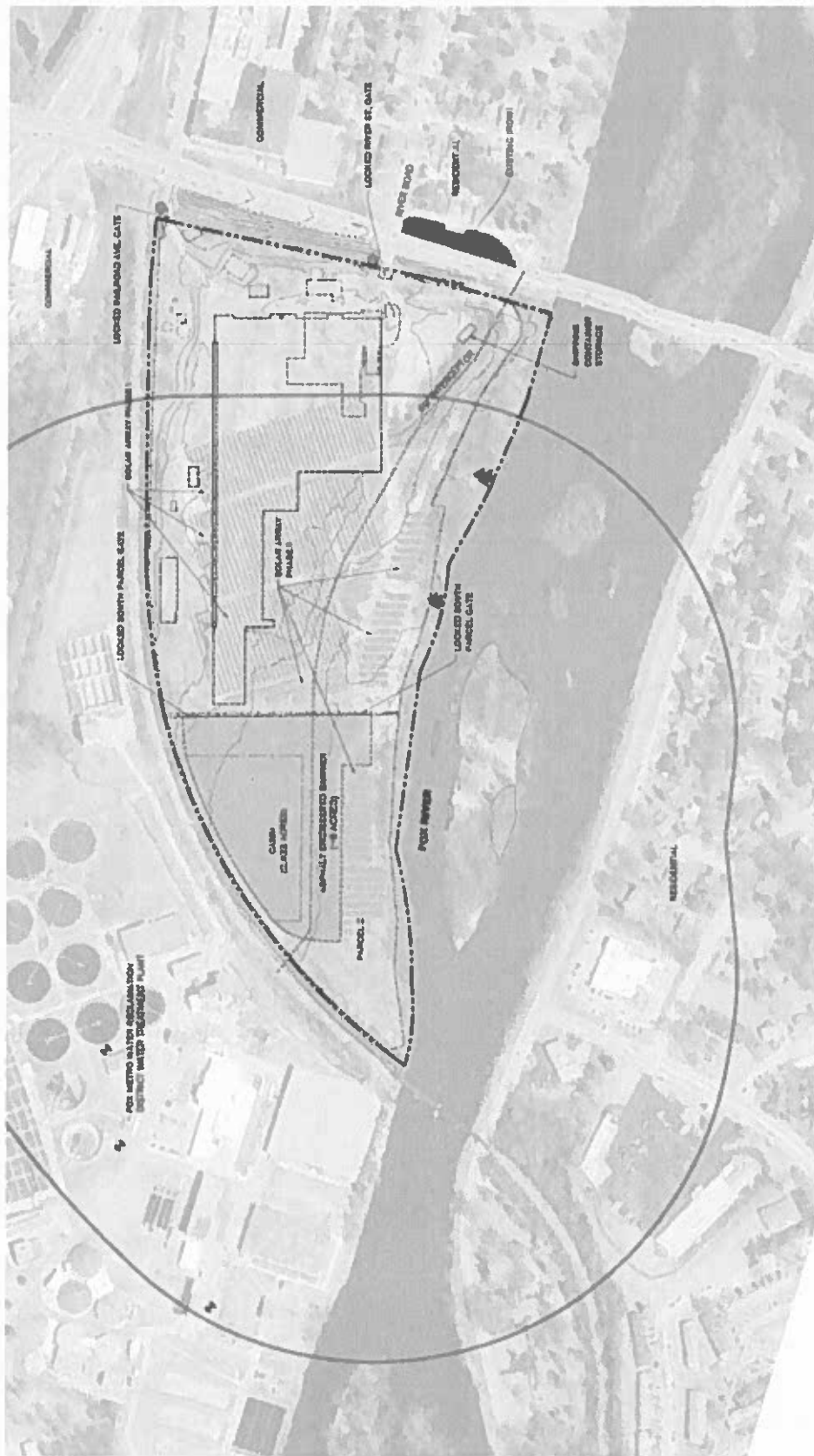
Illinois Environmental Protection Agency
Office of Community Relations – #5
Attn: Sarah Brubaker
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276
217-786-0790

In response to requests received during the comment period or at the discretion of Illinois EPA, a public hearing may be held to clarify one or more issues concerning the permit application. A request for a public hearing must be in writing and must state the nature of the issues proposed to be raised in the hearing. Public notice will be issued 45 days before any public hearing.

When Illinois EPA makes its final decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. The RCRA Permit will become effective 35 days after service of notice of the decision or later if stated in the Permit.

Attachments: A – Map of Facility
B – Map of CAMU

ATTACHMENT A
Facility





Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield, Illinois • 62794-9276 • 217-782-3397

JB Pritzker, Governor

James Jennings, Director

RCRA REMEDIAL ACTION PLAN PERMIT

0934690001 -- Kendall County
Avaya Inc. -- Montgomery Remediation Site
ILD056625858
Log No. B-175R2
RCRA Permit File -- 24A

Issue Date: Draft
Effective Date: Draft
Expiration Date: Draft

Permittees:

Owner

Fox Metro Water Reclamation District
Attn: Karen K. Clementi
682 State Route 31
Oswego, Illinois 60543

Operator

Avaya, Inc.
Attn: Gwendolyn Faino
350 Mt. Kemble Road
Morristown, New Jersey 07960

A Resource Conservation and Recovery Act (RCRA) Remedial Action Plan Permit (RAPP) is hereby granted to Fox Metro Water Reclamation District as Owner and Avaya Inc. as Operator, and the Permittees are authorized by Section 39(d) of the Illinois Environmental Protection Act (Act), and Title 35 Illinois Administrative Code (35 IAC) Subtitle G.

PERMITTED HAZARDOUS WASTE ACTIVITY

Post-Closure Care: Post closure care of Corrective Action Management Unit (CAMU) on the Southern Parcel

This Permit consists of the conditions contained herein and those in the sections and attachments. The Permittee must comply with all terms and conditions and the applicable regulations contained in 35 IAC Parts 702, 703, 705, 720 through 729 that are in effect on the effective date of this Permit.

This Permit is based on the information submitted in the approved permit application identified in Attachment A of this Permit and any subsequent amendments. Any inaccuracies found in the information provided in the approved permit application may be grounds for the termination or modification of this Permit (see 35 IAC 702.186 and 702.187) and potential enforcement action (415 ILCS 5/44(h)).

DRAFT

Joshua L. Rhoades, P.G.
Permit Section Manager
Bureau of Land

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Post-Closure RCRA Remedial Action Plan Permit

Avaya Inc. Montgomery Site

Montgomery, Illinois

Illinois EPA No. 0934690001

U.S. EPA No. ILD056625858

Log No. B-175R2

**RCRA Remedial Action Plan Permit
Avaya Inc. Montgomery Site**

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SECTION I: GENERAL FACILITY DESCRIPTION

A. OWNER AND OPERATOR

Fox Metro Water Reclamation District is the Owner

Owner Contact

Karen K. Clementi
Manager
630-301-6819

Contact Address

682 State Route 31
Oswego, Illinois 60543

Avaya Inc. is the Operator

Facility Contact

Gwendolyn Faino
908-953-2248

Contact Address

350 Mt. Kemble Road
Morristown, New Jersey 07960

The Owner and Operator are referred to as "the Permittee".

B. LOCATION

1. The site is located at 800 South River Street, Montgomery, Illinois, 60538. This site is referred to as "the site", "the facility", or "Avaya" throughout the Permit, unless otherwise specified to indicate other site(s) or facility(s).
2. The general location of the site is shown in Attachment B. It is located at 41°43'06.14" north latitude and 88°20'59.19" west longitude. The site is approximately 45.5 acres and consists mostly of vegetation, asphalt, and solar farms.

C. SUMMARY

During voluntary cleanup under Illinois EPA's Site Remediation Program (SRP) by the previous owners of the property (United Wallpaper Co, Lucent Technologies/Avaya Inc.), soil and groundwater contamination from the management of hazardous waste/hazardous constituents was found on the property during the late 1990's to early 2000's and remediation efforts were made to remove large quantities of contaminated media. Some waste was remediated onsite, and the corrective action management unit (CAMU) was implemented to bury remediation waste. The remediated waste, while stabilized, includes the listed hazardous wastes (F006) and characteristically hazardous wastes (D006, D007, and D008). Currently, groundwater constituents include listed hazardous waste (F001 and F005) and the constituents located within the CAMU.

SECTION II: POST-CLOSURE CARE OF CAMU**A. UNIT IDENTIFICATION**

1. The Permittee utilizes the following corrective management unit (CAMU) subject to the terms and conditions of this Permit:

Designation	Area (acres)	Approximate Volume of Remediation Waste Stored (cubic yards)	Wastes	Waste Codes
CAMU	2.83	25,000	Lead Barium Cadmium Chromium Zinc	F006 D006 D007 D008

2. The location of the CAMU is shown on Attachment B.
3. The CAMU is a closed hazardous waste management unit where waste is left in-place. Thus, the closed CAMU must receive post-closure care for at least 30 years after the date of closure is approved in writing by the Illinois EPA. The Post-Closure care period began on June 13, 2006, the date Illinois EPA approved closure certification for the subject unit. Procedures for the reduction or extension of the post-closure care include but are not limited to: (1) groundwater monitoring; (2) inspection and maintenance of the CAMU final asphalt cover; and (3) providing financial assurance for post-closure activities pursuant to 35 IAC Part 724.
- a. A drawing showing the location of the CAMU within Parcel 2 of the subject facility is provided in Attachment B of this Permit.
- b. Deed Notices for closure of the CAMU were submitted to the Illinois EPA under a cover letter dated May 2, 2006 by Drinker Biddle & Reath, LLP on behalf of Avaya, Inc. and approved by the Illinois EPA on June 13, 2006. The Deed Notices were filed for Record in Kane County on April 17, 2006 as Document Number 2006K040668 and Kendall County on April 24, 2006 as Document Number 200600011947 with the Kendall County Recorder.

B. DESIGN of CAMU

1. The geographical extents and location of the CAMU areas are identified on the map in attachment B of the approved permit application.
2. The base of the CAMU is the native soil material; there was no separate liner installed.
3. The final cover system on the top of the unit is composed of the following layers described from top to bottom:
 - a. 3-inch asphalt layer; and
 - b. 8 to 12 inches of limestone and gravel.
4. The final asphalt cap extends at least 10 feet from the limit of the remediation waste's boundary within the CAMU. It is noted that the current asphalt pavement extends beyond 10 feet requirement in some areas.
5. A survey plat indicating the location and dimensions of the CAMU with respect to permanently surveyed benchmarks was prepared and certified by a professional land surveyor must be submitted in accordance with Condition IV.B.2.

The plat of survey must include notes stating that the owner's and operator's obligation to maintain the integrity of the final cap and restrict disturbance of the CAMU in accordance with the applicable 35 IAC Subtitle G regulations.

C. POST-CLOSURE CARE PERIOD AND MAINTENANCE

1. The post-closure care period for the CAMU began on June 13, 2006, the date of completion of closure. Post-closure care for the CAMU must continue for at least 30 years after that date.
2. On or prior to June 13, 2035 (one year before 30-year post-closure care milestone date, June 13, 2036), the Permittee must submit a Class 2 permit modification request to Illinois EPA in accordance with 35 IAC 703.241(a)(2) and 35 IAC 703, Appendix A, E.2 to extend the post-closure care period of the CAMU for an additional 30-year period or until such time as no unacceptable risks to human health and the environment are present at the CAMU, as determined by the Illinois EPA.

3. The Illinois EPA may include restrictions upon the future use of the site if necessary to protect public health and the environment, including permanent prohibition of the use of the site for purposes which may create an unreasonable risk of injury to human health or the environment. After administrative and judicial challenges to such restrictions have been exhausted, the Illinois EPA must file such restrictions of record in the Office of the Recorder of the county in which the hazardous waste disposal site is located.
4. The Permittee must not allow the property, where the CAMU identified in Condition II.A is located, to be used in a way that could disturb the integrity of the final cover, any components of the containment system, or function of the facility's monitoring systems unless the Illinois EPA finds, by way of a permit modification, that such use is necessary for either of the following reasons.
 - a. It is necessary for the proposed use of the property, and will not increase the potential hazard to the public health or the environment, or
 - b. It is necessary to reduce the threat to human health or the environment.
5. The Permittee must maintain the integrity and effectiveness of the final cover system including making repairs to the asphalt cover as necessary to correct the effects of settling, subsidence, erosion, cracking, and other events.
6. The Illinois EPA may require the continuation of any of the security requirements during part or all of the post-closure care period.
7. The Permittee must prevent run-on and run-off from eroding or otherwise damaging the final cover. At a minimum, the following must be met during a 24-hour, 25-year storm: (1) the run-on control system must be capable of preventing flow onto the CAMU during peak discharge; and (2) the run-off management system must be capable of collecting and controlling the volume of water resulting from the storm. Sealing of the final asphalt cover must be implemented and included in the CAMU maintenance schedule established and approved by the Illinois EPA, as required in Special Condition IV.B.1.b.
8. The Permittee must comply with the requirements for the CAMU described in the approved permit application and the conditions of this Permit. Corrective action must be taken if ponding has been observed, if cracks or erosion channels greater than one inch wide have formed and if gas, odor, vegetative or vector problems arise, if leachate popouts or seeps are present, or if vegetation with tap roots is found to be growing in areas which are not designed to accommodate such vegetation.

9. Within 60 days after the completion of post-closure care of the CAMU the owner or operator shall submit to the Illinois EPA, by registered mail. A certification that post-closure care has been conducted in accordance with the specifications in the approved post-closure care plan. The certification must be signed by the owner or operator and by an independent registered professional engineer. Documentation supporting the independent registered professional engineer. Documentation supporting the independent registered engineer's certification must be furnished to the Illinois EPA upon request until the Illinois EPA releases the owner or operator from the financial assurance requirement for post-closure care.

D. RECORDKEEPING AND REPORTING

1. The Permittee must keep and maintain a written operating record that includes all the records, reports, notification, monitoring data, testing or analytical data, and corrective action data required by 35 IAC 724.173 and the conditions in this Permit, for the entirety of the post-closure care period. The operating record must be kept onsite at the facility and available for Illinois EPA review.
2. The Permittee must maintain and monitor the groundwater monitoring system in accordance with Section III of this Permit and the approved permit application and comply with the other applicable regulations of 35 IAC 724, Subpart F (Groundwater Protection) during the post-closure care period. The Permittee must submit information required by the groundwater monitoring program in Section III of this Permit in an electronic format. Additional guidance regarding the submittal of the information in an electronic format can be found at the Illinois EPA website.
3. The Permittee must protect and maintain surveyed benchmarks used in complying with surveying and recordkeeping requirements. The Permittee will survey the CAMU and update its elevations and examine surveyed benchmarks at a minimum of every five years.

E. INSPECTIONS

1. The Permittee must inspect the components, structures, and equipment at the site in accordance with the inspection schedule in Attachment C and the conditions in this Permit. The results of each inspection must be documented in the facility's operating record.

2. The term “major rain event” as used in the inspection schedule shall be defined as any storm event of three inches of rain or more within a 24-hour period for this facility.
3. The Permittee must inspect the CAMU identified in Condition II.A at least quarterly basis and within 24 hours of any major rain event of three inches or more in a 24-hour period for evidence of any of the following:
 - a. Deterioration, malfunctions, or improper operation of run-on and systems.
 - b. The deterioration of the cover systems.
4. Inspection and maintenance of the final asphalt cover shall be conducted as follows.
 - a. The final asphalt cover shall be patched as needed.
 - b. The inspection of the final asphalt cover (quarterly and after major rainfall events) must include the following details:
 - i. Vegetative growth and overall health;
 - ii. Stress;
 - iii. Bare spots from erosion, washout, or die-offs, etc. ;
 - iv. Ponding or standing water on the final cover; and
 - v. Plumping or sloughing of the final cover.
 - c. A survey of elevation will be conducted at least once every five years to verify that no settling or shifting occurs at the CAMU.
5. If settling occurs, work shall be done to prevent ponding on the final asphalt cover and restore its integrity.
6. If an inspection reveals the need for repair of the asphalt cover, the repairs shall begin and complete in a timely manner but no later than 60 days from the inspection, unless additional time to complete the necessary repair(s) is approved by the Illinois EPA within the 60-day period.

7. Documentation of all inspections, repairs, sealing, and other maintenance shall be maintained by the Operator.
8. The results of inspections, and a description of maintenance performed on the final asphalt cover during the previous year, shall be submitted to the Illinois EPA by March 1 of each year.
9. The Permittee's inspection logs must include, but not limited to, the following information:
 - a. When the inspection was performed (date and time);
 - b. Why was the inspection performed (wet weather event(s), etc.);
 - c. The company and individuals that performed the inspection (name, contact information, etc.);
 - d. What tools were used to perform inspection (camera, ruler, etc.); and
 - e. Photos of the facility to support details in inspection logs.
10. The Permittee's repair logs that detail the following:
 - a. Date and description of repair/maintenance was performed;
 - b. Why was the repair/maintenance performed;
 - c. The company or individuals performed the repair/maintenance;
 - d. What tools were used to perform repair/maintenance; and
 - e. Before and after photos of the repair/maintenance performed.
11. Appropriate corrective action must be taken if problems, including erosion, or other type(s) of final cover failure for the waste or leachate to migrate, are observed at any time. If corrective action is taken, the area involved must be reinspected after 30 days following completion of the work to ensure the corrective actions have adequately corrected the problem(s) noted. Additional follow-up inspection(s) shall be conducted as the facility or Illinois EPA finds necessary.

12. Results of all inspections and a description of any remedial actions taken must be documented in the facility's operating record and maintained for the entire post-closure period.

F. FINANCIAL ASSURANCE

1. The approved cost estimate for providing 30 years of post-closure care of the CAMU including a 10% contingency based on the application is \$2,636,010 in 2026 dollars.
2. Post-closure care costs are determined by multiplying annual costs by the 30-year post-closure care period and by adding any other one-time costs associated with post-closure care. The Permittee must maintain financial assurance meeting the requirements of 35 IAC 724, Subpart H at all times and in an amount equal to or greater than the approved cost estimate.
3. The approved cost estimate in Condition II.F.1 must be adjusted for inflation annually.
4. Financial assurance to meet Conditions II.F.1 and II.F.2 must be submitted within 60 days of the effective date of this Permit. In addition, a revised and updated cost-estimate for post-closure care based on the conditions of this Permit must be submitted in accordance with Condition IV.B.2.

SECTION III GROUNDWATER MONITORING PROGRAM

A. SUMMARY

Hazardous constituents have been detected in groundwater monitoring wells at the Avaya facility (facility) in the vicinity of the Corrective Action Management Unit (CAMU) above the groundwater protection standard. Therefore, a groundwater monitoring program meeting the requirements of 35 IAC 724, Subpart F must be implemented at the Avaya facility. The Groundwater Monitoring Program currently consists of two upgradient monitoring wells and eight downgradient monitoring wells.

B. IMPLEMENTATION

1. The Permittee shall implement the Groundwater Monitoring Program upon the effective date of this Permit. On that date, the groundwater monitoring requirements set forth in this Permit shall supersede those previously established.
2. The Permittee shall carry out the groundwater monitoring specified in this Permit on the groundwater beneath the facility in Montgomery, Illinois. The uppermost aquifer in the vicinity of the facility has been identified as the shallow Cahokia Alluvium and Henry Formation, extending down to the Maquoketa Group bedrock. The Cahokia Alluvium consists of poorly sorted sand, silt, and clay and the Henry Formation consists of well-sorted sand and gravel with minor interbedded silt and clay. For the purpose of this Permit and in accordance with the 35 IAC Part 620 regulations, the uppermost aquifer onsite has been designated Class I: Potable Resource Groundwater. "Uppermost Aquifer" refers to the geologic formation nearest the natural ground surface that is an aquifer, as well as lower aquifers that are hydraulically connected with this aquifer in the vicinity of the facility.
3. The Point of Compliance, defined as the vertical surface located at the hydraulically downgradient limit of the waste management area(s) that extends down into the uppermost aquifer underlying the regulated unit, is delineated by the wells identified as the point of compliance wells in Conditions III.C.1 and illustrated in Figure B3 of the approved permit application.

C. WELL LOCATION AND CONSTRUCTION

1. The Permittee shall install and maintain groundwater monitoring wells and piezometers at the locations specified in the table below to allow for the collection of groundwater samples and elevations from the uppermost aquifer. The locations of these wells and piezometers are specified in Figure B3 of the approved permit application.

<u>IEPA Well No.</u>	<u>Facility Well No.</u>	<u>Well Depth (Ft bgs)#</u>	<u>Well Depth Elevation (Ft MSL)&</u>	<u>Well Screen Interval (Ft MSL)</u>	<u>State Plane Coordinates (Latitude/Longitude)</u>
G01S	MW-1S	9.44	600.53	600.07 – 605.07	41.7160259/-088.3494576
G02S	MW-2S	8.68	604.26	602.94 – 607.94	41.7168812/-088.3501401
R03S	MW-3S-R	15.51	609.15	608.53 – 613.53	41.7191778/-088.3507363
R04S	MW-4S-R	9.86	604.88	604.56 – 609.56	41.7176672/-088.3497232
G05S	MW-5S	10.04	601.13	601.27 – 606.27	41.7176133/-088.3488942
G06S	MW-6S	10.22	601.35	601.27 – 606.67	41.7187457/-088.3482509
G07D	MW-7D	23.03	587.08	588.21 – 598.21	41.7176038/-088.3494370
G08D	MW-8D	22.91	588.28	588.79 – 593.79	41.7175985/-088.3489034
G09D	MW-9D	22.43	589.27	589.30 – 594.30	41.7187616/-088.3482454
G10D	MW-10D	34.94	589.72	587.76 – 592.76	41.7191389/-088.3507477

Note:

“Ft bgs” refers to feet below ground surface.

& “Ft MSL” refers to feet above mean sea level.

2. Construction of each monitoring well/piezometer must be in accordance with the “Monitoring Well Diagram” and “Well Completion Report” forms located on the Illinois EPA website, unless otherwise approved in writing by the Illinois EPA. All new monitoring wells/piezometers to be installed must be continuously sampled and logged on Illinois EPA boring logs contained in the “Field Boring Log” form on the Illinois EPA website, unless otherwise approved by the Illinois EPA.
3. This Permit may be modified by the Permittee or the Illinois EPA in accordance with 35 IAC 703, Subpart G and 705.128 if information becomes available that the current well spacing is not adequate to detect contamination from the hazardous waste management areas to the uppermost aquifer.

4. The Permittee must notify the Illinois EPA within 30 days in writing if any of the wells identified in Condition III.C.1 are damaged or the structural integrity has been compromised. A proposal for the replacement of the subject well shall accompany this notification. The well shall not be plugged until the new well is online and monitoring data has been obtained and verified, unless the well is extremely damaged and would create a potential route for groundwater contamination. Prior to replacing the subject well, the Permittee shall obtain written approval from the Illinois EPA regarding the proposed installation procedures and construction.
5. Should any well become consistently dry or unserviceable; a replacement well shall be provided within 10 feet of the existing well. This well shall monitor the same geologic zone as the existing well and be constructed in accordance with the current Illinois EPA groundwater monitoring well construction standards at the time that the well is replaced. A well which is more than 10 feet from the existing well or does not monitor the same geologic zone must be approved by the Illinois EPA and designated a new well.
6. Monitoring well and piezometer construction shall comply with the minimum standards set forth in 77 IAC Part 920 regulations. The Permittee shall submit boring logs, construction diagrams, and data sheets from the installation and development of a new or replacement well to the Illinois EPA at the address below within 30 days of the date that installation of the well is completed. In addition, the Permittee shall submit certification that plugging and abandonment of a well was carried out in accordance with the approved procedures to the Illinois EPA at the included address within 30 days of the date that the well is plugged and abandoned. All information should be submitted to the appropriate State Agencies.

Illinois Environmental Protection Agency
Bureau of Land - #33
Permit Section
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

7. All wells/piezometers shall be clearly identified and shall be equipped with protective caps and locks. Monitoring wells or piezometers located in high traffic areas must be protected with bumper guards.
8. All groundwater monitoring wells and piezometers not utilized in the approved groundwater monitoring system, but retained by the facility, must be

constructed and maintained in accordance with 77 IAC Part 920 regulations. Monitoring wells and piezometers that are improperly constructed must be abandoned in accordance with Condition III.C.4.

D. GROUNDWATER PROTECTION STANDARD

1. The following hazardous constituents and their concentration limits comprise the groundwater protection standard for the groundwater monitoring wells found in Condition III.C.1. Total values shall be used for comparison with groundwater quality standards. Samples collected during each semi-annual sampling event of each year shall be analyzed for the field parameters and the hazardous waste constituents below. The facility is not performing statistical analysis on analytical results of sampling; therefore, dissolved values are not required.

<u>Field Parameters</u>	<u>STORET Number</u>	<u>Reporting Units</u>
pH	00400	Standard Units
Specific Conductance	00094	µmhos/cm
Temperature of Water Sample	00011	°F
Turbidity	45626	Ntus
Total Dissolved Solids (TDS) #	70300	mg/L
Total Suspended Solids (TSS) #	70298	mg/L
Depth to Water (below land surface)	72019	Ft
Depth to Water (below measuring point)	72109	Ft
Elevation of Bottom of Well #	72020	Ft MSL
Elevation of Groundwater Surface #	71993	Ft MSL
Elevation of Measuring Point (top of casing) ##	72110	Ft MSL

Note:

- # Shall be determined during the semi-annual sampling events of each year.
- ## Shall be surveyed once every two years, or at the request of the Illinois EPA, or whenever the elevation changes as required by Condition III.H.5.

<u>Hazardous Constituents</u>	<u>STORET Number</u>	<u>Concentration Limits^{&}</u>
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Volatile Organic Compounds

Acetone	81552	3.5
Benzene*	34030	0.005
2-Butanone (MEK)	81595	2.3
Chloroethane	34311	NE
Chloroform*	32106	0.07
1,1-Dichloroethane	34496	0.77
1,1-Dichloroethylene (1,1-DCE)	34501	0.007
cis-1,2-Dichloroethylene	77093	0.07
trans-1,2-Dichloroethylene	34546	0.1
Ethylbenzene	34371	0.7
1,1,2,2-Tetrachloroethane +	34516	0.002
Toluene	34010	1.0
1,1,1-Trichloroethane	34506	0.2
Trichloroethylene (TCE)**	39180	0.005
Vinyl chloride **	39175	0.002
Xylenes	34020	10.0

Other Organic Compounds

Anthracene	34220	1.2
Benzo(a)anthracene**	34526	0.00025
Benzo(a)pyrene**	34247	0.0002
Benzo(b)fluoranthene**	34230	0.00025
Benzo(g,h,i)perylene #	34521	0.12
Benzo(k)fluoranthene**	34242	0.0025
Benzoic Acid	77247	15.0
4-Bromophenyl phenyl ether +	34636	NE
Butyl benzyl phthalate ^	34292	1.4
Carbazole +	77571	NE
4-Chloroaniline ^	73529	0.028
Chrysene**	34320	0.025
Dibenz(a,h)anthracene**	34556	0.0001
Di(2-ethylhexyl)phthalate*	39100	0.006
1,4-Dichlorobenzene ^	34571	0.075
Diethyl phthalate	34336	3.1
Di-n-butyl phthalate	39110	0.38
Di-n-octyl phthalate ^	34596	0.14

<u>Hazardous Constituents</u>	<u>STORET Number</u>	<u>Concentration Limits^{&}</u>
Fluoranthene	34376	0.15
Fluorene	34381	0.15
HFPO-DA (Hexafluoropropylene Oxide Dimer Acid)	52612	0.000010
Indeno(1,2,3-cd)pyrene**	34403	0.00025
Naphthalene	34696	0.077
PFBS (perfluorobutanesulfonic acid)	52602	0.002
PFHxS (perfluorohexanesulfonic acid)	52605	0.000010
PFNA (perfluorononanoic acid)	51626	0.000010
PFOA (perfluorooctanoic acid)*	51521	0.000004
PFOS (perfluorooctanesulfonic acid)*	52606	0.000004
Phenanthrene #	34461	0.12
Pyrene	34469	0.12
1-Methylnaphthalene	77418	0.27

Inorganic Constituents

Arsenic	01002	0.01
Aluminum	01105	1.9
Barium	01007	2.0
Cadmium	01027	0.005
Chromium (total)	01034	0.1
Chromium (hexavalent) +	01032	0.05
Chromium (trivalent) +	01033	0.1
Copper	01042	0.5
Cyanide	00720	0.2
Lead	01051	0.0075
Lithium	01132	0.04
Manganese	01055	0.15
Molybdenum	01062	0.308
Mercury	71900	0.002
Nickel	01067	0.077
Tin #	01102	2.3
Zinc	01092	1.2
Radium (combined 226+228) ^{&}	11503	5.0

NOTE:

NE = Concentration limit not established

& = Concentration limits are reported in mg/L, except radium which is reported in units of pCi/L

*** = Carcinogen**

**** = Carcinogen with a mutagenic mode of action**

+ = Health-Based Guidance Level calculated in accordance with 35 IAC Part 620, Subpart F and Appendix A and provided by the Illinois EPA Office of Toxicity Assessment.

= Class I groundwater objective provided by the Illinois EPA Office of Toxicity Assessment (Chemicals not in TACO, Tier 1 Tables)

^ = Class I groundwater objective obtained from Appendix B, Table E of 35 IAC Part 742

- a. In addition to meeting the individual Class I groundwater protection standards indicated in the table above, an evaluation for mixtures of similar-acting substances must be conducted for non-carcinogenic substances, to meet the requirements of 35 IAC 620.615.
 - b. In addition to meeting the individual Class I groundwater protection standards indicated in the table above, the requirements of 35 IAC 620.615 must be met for carcinogenic substances.
 - c. Calculations to meet Conditions III.D.1.a and b must be based on the most current information to remain protective of human health and the environment.
2. Alternate concentration limits may be established where the Permittee can determine a constituent will not pose a substantial hazard to human health and the environment.
- a. Where a hazardous constituent has a standard in 35 IAC Part 620, the facility must apply for an adjusted standard as outlined in Section 28.1 of the Act.

- b. For those hazardous constituents without a 35 IAC Part 620 standard, the alternative concentration limit(s) proposed by the facility must be approved by the Illinois EPA.
3. The compliance period (post-closure period) during which the groundwater protection standard applies shall be extended until the Permittee demonstrates that the groundwater protection standard has not been exceeded at the point of compliance for three consecutive years.

E. GROUNDWATER MONITORING PROGRAM

The Permittee shall conduct the groundwater monitoring program and perform groundwater monitoring detailed in this section, in accordance with the following:

1. The Permittee shall determine groundwater quality at each of the CAMU monitoring wells identified in Condition III.C.1 semi-annually during the active life of the regulated units (including post-closure care period). The Permittee may resample a well within 30 days for constituents whose concentration exceed the lower limit of quantitation (LLOQ) listed for the approved analytical method(s) specified in USEPA's Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods, Third Edition (SW-846) and finalized updates USEPA's SW-846 (latest version). The results of the second round of analyses will be used to make the determinations required by Condition III.E.3, unless resampling is not conducted. If resampling is not conducted, the first round analytical data will be used for the determinations required by Condition III.E.3.
2. The Permittee shall determine the groundwater flow rate and direction in the uppermost aquifer at least annually, and report this data to the Illinois EPA at least annually, from the monitoring wells and piezometers identified in Condition III.C.1.
3. The Permittee shall evaluate the results of the analyses required by Conditions III.E.1 above and identify:
 - a. The concentration of any organic or total (unfiltered) inorganic constituent listed in Condition III.D.1 detected which is above the LLOQ listed in the approved analytical method(s) specified in USEPA's Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods, Third Edition (SW-846) and finalized updates.

NOTE: The term detected as used in this condition and elsewhere in the Permit is the latest promulgated version of USEPA's Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods, Third Edition (SW-846) and finalized updates for the applicable analytical methods.

F. GROUNDWATER ELEVATION

1. The Permittee shall determine the groundwater surface elevation referenced to mean sea level (MSL) at each well each time groundwater is sampled in accordance with Condition III.H.3.
2. The Permittee shall determine the surveyed elevation of the top of casing ("stick-up") when the well is installed (with as-built diagrams) and every two years, or at the request of the Illinois EPA, or whenever the elevation changes in accordance with Condition III.H.5. "Stick-up" refers to the height of the referenced survey datum. This point is determined within ± 0.01 foot in relation to mean seal level, which in turn is established by reference to an established National Geodetic Vertical Datum.
3. Elevation, as referenced to MSL, of the bottom of each monitoring well (STORET 72020), is to be reported at each semi-annual sampling event. The mandatory measurement shall be taken during each sampling event of each year.

G. SAMPLING AND ANALYSIS PROCEDURES

The Permittee shall use the techniques and procedures described in Section C.7.5 of the approved permit application, except as modified, when obtaining and analyzing samples from the groundwater monitoring wells described in Condition III.C.1:

1. Samples shall be collected using the techniques described in Section C.7.5 of the approved Permit Application.
2. Samples shall be preserved, shipped, and handled in accordance with the procedures specified in Section C.7.5 of the approved permit application.
3. Samples shall be analyzed in accordance with the procedures specified in Section C.7.5 of the approved permit application. Groundwater analysis must be in accordance with the most current version of the applicable methods found in USEPA's Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods, Third Edition (SW-846) and finalized updates.
4. Samples shall be tracked and controlled using the chain-of-custody procedures specified in Section C.7.5 of the approved permit application.

H. REPORTING AND RECORDKEEPING

1. The Permittee shall enter all monitoring, testing, and analytical data obtained in accordance with Conditions III.D, III.E, III.F, and III.G in the operating record.
2. Samples collected to meet the requirements of the groundwater monitoring program described in Conditions III.D, III.E, III.F, and III.G shall be collected and reported as identified in the included table. All additional information required by the groundwater monitoring program (as specified in Conditions III.D, III.E, III.F, and III.G) shall also be submitted to the Illinois EPA at the address listed in III.C.6 in accordance with this schedule.

<u>Sampling Event Of Calendar Year</u>	<u>Samples To Be Collected During The Months Of</u>	<u>Results Submitted To The Agency By The Following</u>
First Semi-annual	April – June	July 15
Second Semi-annual	October – December	January 15

3. Groundwater surface elevation data measured pursuant to Condition III.F.1, shall be collected at least semi-annually and submitted to the Illinois EPA as identified in the table in Condition III.H.2.
4. The Permittee shall report groundwater flow rate and direction in the uppermost aquifer, as required by Condition III.E.2 during the second semi-annual sampling event of each year.
5. The Permittee shall report the surveyed elevation, as required by Condition III.F.2 of the top of the well casing ("stick-up"), referenced to MSL in accordance with the following schedule:
 - a. For wells identified in Condition III.C.1, every two years (during the second semi-annual sampling event) or at the request of the Illinois EPA, or whenever the elevation changes.
 - b. For any new wells at the time of installation and reported in the as-built diagrams, subsequent measurements shall be made every two years (during the second semi-annual sampling event), or at the request of the Illinois EPA or whenever the elevation changes.

6. Elevation of the bottom of each monitoring well identified in Condition III.C.1 as referenced to MSL, is to be reported at least annually. This measurement shall be taken during each sampling event in accordance with Condition III.H.2.
7. Information required by Conditions III.H.2, III.H.3, III.H.5, and III.H.6 must be submitted in an electronic format. The information is to be submitted, as fixed-width text files formatted as found in the form, "Formatting Requirements for the 01 (and 02) Record of the Electronically Submitted Groundwater and Leachate Data" (LPC 160) located on the Illinois EPA webpage titled, "Electronic Reporting of Groundwater Data," and in accordance with the schedule found in III.H.2. Additional guidance regarding the submittal of the information in an electronic format can be found on the Illinois EPA website.
8. The Permittee shall submit a completed "RCRA Facility Groundwater, Leachate, and Gas Reporting Form" (LPC 592) as a cover sheet for any notices or reports required by the Permit for identification purposes. Only one copy of the LPC 592 with wet signatures must accompany your submittal. However, the Permittee must submit one original copy of each notice or report submitted to Illinois EPA in paper format and (excluding the groundwater and leachate monitoring results submitted in an electronic format) a minimum of two electronic copies (one addressed to the Bureau of Land Permit Section, and one addressed to the regional Field Operation Section). Additional paper and electronic copies must be provided upon Illinois EPA request. The form is not to be used for permit modification requests.
9. The Permittee shall report all information to the Illinois EPA in a form which can be easily reviewed. All submittals must contain tables of data drawings and text (as necessary) to accurately describe the information contained in the submittal.
10. The Permittee shall submit a written report annually, in accordance with the schedule found in III.H.2 which discusses the effectiveness of the Groundwater Monitoring Program. At a minimum, the report must include, but is not limited to, the following:
 - a. Address the information requirements in Conditions III.D, III.E, III.F, and III.G.
 - b. Provide a discussion of any improvement in the quality of groundwater beneath the facility.
11. If the Permittee determines that groundwater monitoring program is not effective, the Permittee shall:

- a. Notify the Illinois EPA in writing within seven days of the date that this determination is made.
- b. Submit a request for permit modification to the Illinois EPA within 90 days describing any changes which must be made to the Groundwater Monitoring Program to ensure that the groundwater flow is being adequately controlled.

I. REQUEST FOR PERMIT MODIFICATION

1. If the Permittee determines that the Groundwater Monitoring Program no longer satisfies the requirements of 35 IAC 724, Subpart F, the Permittee must, within 90 days, submit an application for a permit modification to the Illinois EPA, Bureau of Land, Permit Section to make any appropriate changes to the program which will satisfy the regulations.
2. Conditions in this section of the Permit may be modified in accordance with 35 IAC 705.128 if there is cause for such modification, as defined in 35 IAC 703.271. Causes for modification identified in the section include, but are not limited to, alterations to the permitted facility, additional information which would have justified the application of different permit conditions at the time of issuance, and new regulations.

SECTION IV: SPECIAL CONDITIONS

A. 39(i) CERTIFICATION

1. The Permittee must provide a completed Illinois EPA permit application form LPC-PA23 with all permit modification requests, additional information, and permit applications that are submitted to Illinois EPA.
2. The Permittee must submit a current 39(i) certification and supporting documentation with all permit applications.

B. COMPLIANCE SCHEDULE

The Permittee must submit to Illinois EPA for review and approval the following information as a Class 1* permit modification request(s).

1. Within 30 days of the effective date of this Permit, the Permittee must submit:
 - a. Information on how Conditions II.C.7 to prevent any run-on and run-off water from coming in contact with the waste and leaving the CAMU. The Permittee must also include a maintenance schedule at a set frequency to seal the final asphalt cover; such proposed schedule must be based on the site-specific conditions and recommended industry standards for asphalt maintenance.
 - b. Templates used for a formal repair log and formal inspection log that include the details outlined in Conditions II.E.9 and II.E.10. These templates are to be used to log all future repair and inspection events. Example templates will be attached and can be used by the Permittee for future repairs and inspections.
2. Within 60 days of the effective date of this Permit, the Permittee must submit:
 - a. A revised cost-estimate for post-closure care which includes an itemized list of required post-closure activities based on third-party costs as well as a total estimated cost of post-closure for 30 years.
 - b. Financial assurance document as required in Condition II.F.4.
3. Within 90 days of the effective date of this Permit, the Permittee must revise and submit a survey plat than meets the requirements of 35 IAC 724.410(b). The survey plat must accurately describe the previously established boundaries of the

CAMU, the required extent of the asphalt cover, legal boundary of the facility, a detailed legend, and accurately describe the current facility layout.

4. Within 90 days of the effective date of this permit, the Permittee must submit the following:
 - a. The Illinois EPA can no longer approve the use of groundwater remediation objectives for routine comparison at individual wells in the monitoring network. The Permittee must propose a work plan within 90 days for Illinois EPA review and approval that includes, at a minimum, the following:
 - i. Proposal to investigate the source of contamination for groundwater constituents listed in Condition III.D.1 of the permit which exceed the 35 IAC Part 620, Class I Groundwater Quality Standard. Results of this investigation will determine whether a Groundwater Corrective Action Program under 35 IAC 724.200 for the CAMU is required, or corrective action for a separate source may need to be required.
 - ii. Proposal for necessary well locations to delineate the horizontal and vertical extent of the groundwater contamination plume.
 - iii. Proposal for the next steps, including corrective action to reduce contaminants in groundwater to the appropriate levels.
 - iv. Proposal for well integrity evaluation for the monitoring wells to include the following (see Attachment D for guidance):
 1. Well casing inspection with downhole camera;
 2. Well depth elevations and top of casing must be evaluated for each well to determine potential silting issues within the screened interval and/or frost heaving issues;
 3. Inspection of all well pads, outer casings, labels, locks, and locking mechanisms; and
 4. Determination of free product.
 - v. A demonstration that constituents are not related to the CAMU must be provided for Illinois EPA review and approval to request

removal of any newly added constituents in Condition III.D.1 of the permit.

5. Within 180 days of the effective date of this permit, the Permittee must submit the following addendum to the approved permit application:
 - a. Revised Attachment C1 of the approved permit application to ensure the information is accurately and consistently represented. It appears that the screen interval values may have been interchanged with either the total well depth or the top of casing elevation. This information, upon Illinois EPA approval, will be incorporated into the permit.
 - b. Revise Figure B2 to include the following:
 - i. Correct well locations; and
 - ii. Legible contour designations.
 - c. Revise Figure B3 to include the following:
 - i. Correct well name designations.
 - d. An adequate cross-section in accordance with 35 IAC 703.185(b). The cross-section must include:
 - i. Legible text;
 - ii. The aquifer in which the wells are screened;
 - iii. Any hydraulically connected aquifers;
 - iv. CAMU waste boundary;
 - v. Clear identification of individual geologic units (including bedrock); and
 - vi. Correct identification of monitoring wells within the cross-section area and their respective screened interval and measured water level.

- e. A proposed Sampling and Analysis Plan to include procedures in accordance with 35 IAC 703.185(g)(6), 724.197(d) and (e), and 724.199(c), including the following:
 - i. Proposed the Lower Limit of Quantitation (LLOQ) instead of the Practical Quantitation Limit (PQL);
 - ii. Revised pages to the permit application to update standards and add any additional chemical constituents. A proposal for background value establishment may also be provided;
 - iii. A routine frequency for inspecting wells and conducting well maintenance must be proposed;
 - iv. Measurement of static water level;
 - v. Detection of immiscible layers;
 - vi. Well evacuation;
 - vii. Sample withdrawal;
 - viii. In-situ or field analysis;
 - ix. Where purgewater from groundwater sampling will be containerized, stored, and upon receipt of groundwater analysis, disposed of properly; and
 - x. Additional information regarding standard chain-of-custody procedure for all samples including the following:
 - 1) Sample labels;
 - 2) Sample seals;
 - 3) Field logbook;
 - 4) Chain-of-custody;
 - 5) Sample analysis request sheets;
 - 6) Laboratory logbook;

- 7) Description of the Analytical and Quality Assurance Procedures for all samples;
 - 8) Description of the decontamination of sampling equipment; and
 - 9) An alternative sampling method must be proposed. The use of peristaltic pumps and/or bailers for groundwater sampling is not recommended.
- f. An updated water well survey.
6. Within 180 days, the Permittee must submit the following pursuant to Conditions in the previous RAPP (Log No. B-175R):
- a. Electronic groundwater data from May 19, 2020 to present;
 - b. Electronic groundwater data from the 2012 second semi-annual sampling event;
 - c. Electronic groundwater data for Trichloroethene, Total Suspended Solid (TSS), and Total Dissolved Solids (TDS), from 2012 to present;
 - d. Electronic groundwater data for lead from 2012;
 - e. Electronic well-related data including at minimum, top of well casing ("stick up") and elevation of groundwater (Ft MSL) prior to collection of groundwater samples, from 2012 to present; and
 - f. Notification to the Illinois EPA upon submission of the electronic data required in Condition IV.B.6.a through e above.

C. OTHER SPECIAL REQUIREMENTS

1. If the owner or operator or any subsequent owner of the land which the CAMU is located wishes to remove the stabilized hazardous wastes or cover, or otherwise alter the CAMU, such person shall request a modification to the post-closure plan in accordance with the applicable requirements in 35 IAC Parts 703 and 705.
2. **PERMIT CONDITION CONFLICT:** In case of conflict between a special permit condition and the RAPP application, the special condition will prevail in accordance with 35 IAC 702.160.

**SECTION V: STANDARD CONDITIONS
FOR REMEDIAL ACTION PLAN PERMITS (RAPPs)**

1. **EFFECT OF PERMIT.** The existence of a RAPP will not constitute a defense to a violation of the Environmental Protection Act or applicable regulations. Issuance of this permit does not convey property rights or any exclusive privilege. Issuance of this permit does not authorize any injury to property or invasion of other private rights, or infringement of state or local law or regulations. (35 IAC 702.181 and 35 IAC 702.147)
2. **PERMIT ACTIONS.** This Permit may be modified, reissued, or terminated for cause as specified in 35 IAC 703.270 through 703.273, 703.304, and 702.186. The filing of a request by the Permittee for a permit modification or termination, or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. (35 IAC 702.146 and 35 IAC 703.304)
3. **DUTY TO COMPLY.** The Permittee must comply with all conditions of this Permit except for the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of the Illinois Environmental Protection Act and is grounds for enforcement action, permit termination or modification, or denial of a permit renewal application. (35 IAC 702.141 and 35 IAC 703.242)
4. **PERMIT LIMITATIONS.** This RAPP is approved pursuant to 35 IAC Parts 703 and 724. The issuance of this RAPP does not constitute approval of any remediation plan or cleanup objective under 35 IAC Parts 740 or 742.
5. **NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE.** It will not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. (35 IAC 702.143)
6. **DUTY TO MITIGATE.** In the event of noncompliance with the Permit, the Permittee must take all reasonable steps to minimize releases to the environment and must carry out such measures as reasonable to prevent significant adverse impacts on human health or the environment. (35 IAC 702.144)
7. **PROPER OPERATION AND MAINTENANCE.** The Permittee must properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory,

and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the Permit. (35 IAC 702.145)

8. **DUTY TO PROVIDE INFORMATION.** The Permittee must furnish to Illinois EPA, within a reasonable time, any relevant information which Illinois EPA may request to determine whether cause exists for modifying, revoking, and reissuing or terminating this Permit, or to determine compliance with this Permit. The Permittee must also furnish to the Illinois EPA, upon request, copies of records required to be kept by this Permit. (35 IAC 702.148)
9. **INSPECTION AND ENTRY.** The Permittee must allow an authorized representative of Illinois EPA, upon the presentation of credentials and other documents as may be required by law, to:
 - a. Enter, at reasonable times, upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Permit;
 - b. Have access to a copy, at reasonable times, of any records that must be kept under the conditions of this Permit;
 - c. Inspect, at reasonable times, any facilities, equipment, practices, or operations regulated or required by this Permit;
 - d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location. (35 IAC 703.149)
10. **MONITORING AND RECORDS.** The Permittee must comply with the following requirements for monitoring and maintaining records:
 - a. Samples and measurements taken for the purpose of monitoring must be representative of the monitored activity. The method used to obtain a representative sample of the waste must be the appropriate method from Appendix A of 35 IAC Part 721. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, latest versions; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, latest versions; or an equivalent method as specified in the approved Waste Analysis Plan.
 - b. The Permittee must retain records of all monitoring information, including all

calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this Permit, and records of all data used to complete the application for this Permit for a period of at least three years from the date of the sample, measurement, report or application. These periods may be extended by Illinois EPA at any time. The Permittee must maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well.

- c. Records of monitoring information must include:
 - i. The date(s), exact place, and time of sampling or measurements;
 - ii. The individual(s) who performed the sampling or measurements;
 - iii. The date(s) analyses were performed;
 - iv. The individual(s) who performed the analyses;
 - v. The analytical technique(s) or method(s) used; and
 - vi. The result(s) of such analyses. (35 IAC 702.150)
- 11. **REPORTING PLANNED CHANGES.** The Permittee must give written notice to Illinois EPA as soon as possible of any planned physical alterations or additions to the permitted facility. In general, proposed changes to the facility will need to be submitted to Illinois EPA as permit modification request that complies with the requirements of 35 IAC 703.304. (35 IAC 702.152(a))
- 12. **CONSTRUCTION CERTIFICATION.** For a new hazardous waste management facility, the Permittee may not commence treatment, storage, or disposal of hazardous waste; and for a facility being modified the permittee may not treat, store, or dispose of hazardous waste in the modified portion of the facility, until:
 - a. The Permittee has submitted to Illinois EPA by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the Permit; and
 - b. Illinois EPA has inspected the modified or newly constructed facility and finds it complies with the condition of the Permit; or

- c. If, within 15 days of the date of submission of the letter in paragraph (a), the Permittee has not received notice from Illinois EPA of its intent to inspect, prior inspection is waived, and the Permittee may commence treatment, storage, or disposal of hazardous waste (35 IAC 703.247).
- 13. **ANTICIPATED NONCOMPLIANCE.** The Permittee must give advanced written notice to Illinois EPA of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements, regulations, or the Act. (35 IAC 702.152(b))
- 14. **TRANSFER OF PERMITS.** This Permit is not transferable to any person or corporation unless the transfer is approved in writing by Illinois EPA. All permit transfers must be conducted in accordance with 35 IAC 703.305(c). (35 IAC 702.152(c))
- 15. **MONITORING REPORTS.** Monitoring results must be reported at the intervals specified in the Permit. (35 IAC 702.152(d))
- 16. **COMPLIANCE SCHEDULES.** Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this Permit must be submitted no later than specified in 35 IAC 702.162. (35 IAC 702.152(e))
- 17. **TWENTY-FOUR HOUR REPORTING.** The Permittee must comply with the following requirements for 24-hour reporting:
 - a. The Permittee must report to Illinois EPA and the National Response Center any noncompliance with the Permit which may endanger health or the environment. Any such information must be reported orally within 24 hours from the time the Permittee becomes aware of the following circumstances:
 - i. information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
 - ii. information concerning the release or discharge of any hazardous waste or of a fire or explosion at the hazardous waste management facility, which could threaten the environment or human health outside the facility.
 - b. The description of the occurrence and its cause must include:
 - i. the name, address, and phone number of the owner or operator;
 - ii. the name, address, and phone number of the facility;

- iii. the date, time, and type of incident;
 - iv. the name and quantity of material(s) involved;
 - v. the extent of injuries, if any;
 - vi. an assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
 - vii. the estimated quantity and disposition of recovered material that resulted from the incident.
- c. A written submission must also be provided within five days of the time the Permittee becomes aware of the circumstances. The written submission must contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times and if the noncompliance has not been corrected; the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. Illinois EPA may waive the five-day written notice requirement in favor of a written report within 15 days. (35 IAC 702.152(f) and 35 IAC 703.245(b))
18. **OTHER NONCOMPLIANCE.** The Permittee must report all instances of noncompliance not otherwise required to be reported under Standard Conditions 15, 16, and 17, at the time monitoring reports, as required by this Permit, are submitted. The reports must contain the information listed in Standard Condition 17. (35 IAC 702.152(g))
19. **OTHER INFORMATION.** If the Permittee becomes aware that they failed to submit relevant facts in the permit application or submitted incorrect information in a permit application or in any report to Illinois EPA, the Permittee must promptly submit such facts or information to Illinois EPA. (35 IAC 702.152(h))
20. **REPORTING REQUIREMENTS.** The following reports required by 35 IAC Part 724 must be submitted in addition to those required by 35 IAC 702.152 (reporting requirements):
- a. **Manifest discrepancy report:** if a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy with the waste generator or transporter. If the discrepancy is not resolved within 15 days after receiving the waste, the Permittee must immediately submit to Illinois EPA a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. (35 IAC 724.172(b))

- b. Unmanifested waste report: The Permittee must submit to Illinois EPA within 15 days of receipt of unmanifested waste an unmanifested waste report on EPA form 8700-13B. (35 IAC 724.176)
- c. Annual report: an annual report must be submitted covering facility activities during the previous calendar year. (35 IAC 724.175)

21. SUBMITTAL OF REPORTS OR OTHER INFORMATION. All written reports or other written information required to be submitted by the terms of this Permit should be sent to:

Illinois Environmental Protection Agency
Materials Management and Compliance Section
Bureau of Land – #24
2520 West Iles Avenue
P.O. Box 19276
Springfield, Illinois 62794-9276

22. PERMIT APPEAL. This RAPP may be appealed in accordance with the provisions contained in 35 IAC 703.303(f) or 35 IAC 703.304(e).

23. PERMIT MODIFICATION. If the Permittee wishes to modify this RAPP, the Permittee must send an application for permit modification to:

Illinois Environmental Protection Agency
Bureau of Land Permit Section – #33
2520 West Iles Avenue
P.O. Box 19276
Springfield, Illinois 62794-9276

The Permittee must submit the RCRA RAPP Application form and a detailed description of the requested modification. If Illinois EPA believes the requested change(s) would significantly change the management of remediation waste, Illinois EPA will comply with the requirements of 35 IAC 703.303(a)–703.303(e). The certification of closure, if approved, will not be considered a significant change requiring public notice in accordance with 35 IAC 703.303(d).

24. PERMIT RENEWAL. If the Permittee wishes to renew this Permit, the Permittee must follow the process for application and issuance of RAPPs found in 35 IAC 703, Subpart H. If the Permittee wishes to continue an activity allowed by this Permit after the expiration date of this Permit, the Permittee must apply for a new permit at least 180 days before this Permit expires, unless permission for a later date has been granted by Illinois EPA. This Permit and all conditions herein will remain in effect beyond this Permit's expiration

date if the Permittee has submitted a renewal application at least 180 days before this Permit expires, and through no fault of the Permittee, Illinois EPA has not issued a new permit. (35 IAC 703.303(a), 35 IAC 703.304(g), and 35 IAC 703.304(h))

25. **TERMINATION OF PERMIT.** If Illinois EPA determines the RAPP should be terminated, Illinois EPA must comply with the procedures under 35 IAC 703.303(a)–703.303(e). If the Permittee wishes to terminate the RAPP, the Permittee must submit a permit modification.
26. **CONFIDENTIALITY.** Any claim of confidentiality must be asserted in accordance with 35 IAC 703.302(e) and 35 IAC 703.120.
27. **SIGNATORY REQUIREMENT.** All permit application, reports, or information submitted to the Illinois EPA regarding the RAPP must be signed and certified in accordance with 35 IAC 702.126. (35 IAC 703.151)
28. **SECURITY REQUIREMENTS.** The Permittee must comply with the security provisions of 35 IAC 724.101(j)(3), and the emergency coordinator requirements of 35 IAC 724.101(j)(11).
29. **INSPECTION REQUIREMENTS.** The Permittee must inspect the remediation waste management site for malfunctions, deterioration, operator error, and discharges that may be causing or may lead to a release of hazardous waste constituents to the environment or may be a threat to human health. Inspections must be conducted often enough (at least once each operating day) to identify problems in time to correct them before they harm human health or the environment. If a hazard has already occurred, the Permittee must immediately take remedial action to minimize impacts on human health and the environment. Within 30 days of any releases, the Permittee must submit to Illinois EPA a description of the release and a description of any corrective measures taken. (35 IAC 724.101(j)(4))
30. **LAND DISPOSAL RESTRICTIONS.** If waste is taken off-site for treatment or disposal, the Permittee must comply with the land disposal restriction contained in 35 IAC Part 728.
31. **MANIFESTS.** If hazardous waste is shipped off-site, the Permittee must comply with the manifest, pre-transport, and reporting and record keeping requirements of 35 IAC 722, Subparts B, C, and D. If non-hazardous special waste is shipped off-site, the Permittee must comply with the manifest requirements of 35 IAC 808.121 and 35 IAC 808.122. In either case, a transporter licensed in accordance with 35 IAC Part 809 must be used when transporting hazardous or non-hazardous special waste.

32. **APPLICATION DATA.** The Permittee must maintain all data used to complete the RAPP application, and any supplemental information the Permittee submits to Illinois EPA, for a period of at least three years from the date the original RAPP application is signed. This information must be made available to representatives of Illinois EPA upon request. (35 IAC 703.305(a))
33. **RECORDKEEPING.** The Permittee must maintain records documenting compliance with 35 IAC 724.101(j)(1) through 724.101(j)(12) at the facility. (35 IAC 724.101(j)(13))
34. **CLOSURE REQUIREMENTS FOR ACCUMULATION AREAS.** The Permittee must close container storage areas, tanks, drip pads, or containment buildings used for the accumulation of on-site generated hazardous waste in accordance with the requirements identified at 35 IAC 722.117(a)(8).
35. **CARE AND USE OF PROPERTY.** The Permittee must provide post-closure care for the facility as required by 35 IAC 724.217 and in accordance with the approved post-closure plan.
36. **AMENDMENT TO POST-CLOSURE PLAN.** The Permittee must amend the post-closure plan whenever a change in the facility operation plans or facility design affects the post-closure plan or when an unexpected event has occurred which has affected the post-closure plan pursuant to 35 IAC 724.218(d).
37. **COST ESTIMATE FOR POST-CLOSURE.** The Permittee's original post-closure cost estimate, prepared in accordance with 35 IAC 724.244, must be:
 - a. Adjusted for inflation either 60 days prior to each anniversary of the date on which the first post-closure cost estimate was prepared or if using the financial test or corporate guarantee, within 30 days after close of the firm's fiscal year. This Permit condition is applicable throughout the entirety of the post-closure care period.
 - b. Revised whenever there is a change in the facility's post-closure plan increasing the cost of closure.
 - c. Kept on record at the facility and updated. (35 IAC 724.244)
 - d. Maintained at the value approved by the Illinois EPA with annual adjustment for inflation during the post-closure care period and cannot be decreased unless approved by the Illinois EPA in a permit modification.
38. **FINANCIAL ASSURANCE FOR POST-CLOSURE CARE.** The Permittee must demonstrate compliance with 35 IAC 724.245 and 703.241(a)(2) by providing documentation of

financial assurance, as required by 35 IAC 724.251, in at least the amount of the cost estimates required by Standard Condition V.37. This financial assurance must be maintained at such value throughout the post-closure care period and must be adjusted accordingly pursuant to Standard Condition V.37. Changes in financial assurance mechanisms must be approved by the Illinois EPA pursuant to 35 IAC 724.245.

Financial assurance documents submitted to the Illinois EPA should be directed to the following address:

Illinois Environmental Protection Agency
Bureau of Land #24
Financial Assurance Program
2520 West Iles Avenue
P.O. Box 19276
Springfield, IL 62794-9276

39. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS.
The Permittee must comply with 35 IAC 724.248 whenever necessary.

SECTION VI: REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA Permit are summarized below. It is provided for the convenience of the Permittee, but it is not meant to supersede the requirements of the various sections of this Permit.

SECTION II: POST-CLOSURE CARE OF CAMU

Condition	Action	When
II.C.2	Submit a Class 2 modification request to extend post-closure care	By June 26, 2035
II.C.9	Submit certification of completion of post-closure care	Within 60 days of completing post-closure care
II.D.1	Maintain repair and inspection logs and furnish it to Illinois EPA	Upon request
II.D.3 and II.E.4.c	Survey of CAMU and benchmarks	At least every five years and as needed.
II.E.3	Inspect CAMU	Quarterly basis <u>and</u> Within 24 hours of 3-inch of rain within 24 hours
II.E.6	Repair of final cover	Complete within 60 days from inspection unless preapproved for alternative scheduled by Illinois EPA
II.E.8	Submit annual post-closure care summary	Annually, By March 1
II.E.11	Inspection after corrective action is completed for the final cover	Within 30 day of completion and any additional follow-up as determined by the Permittee or Illinois EPA
II.F.2	Submit cost-estimate and financial assurance for 30 years	Within 60 days of the effective date of this permit

SECTION III: Groundwater Monitoring

Condition	Action	When
III.E.1	Submit groundwater monitoring data	Semi-annually, by July 15, and by January 15
III.F.1	Submit groundwater surface elevation	Semi-annually, by July 15, and by January 15
III.E.2	Submit determination of the groundwater flow rate and direction of uppermost aquifer	Annually, by January 15
III.F.2	Submit survey elevation of the top of the casing	Every two years, or at the request of the Illinois EPA, or whenever the elevation changes. For new wells, at the time of installation.
III.H.6	Elevation of the bottom of each well	Annually, by January 15
III.H.10	Submit written report which discusses the effectiveness of the Groundwater Monitoring Program	Annually, by January 15
III.H.11	If Permittee determines the Groundwater Monitoring Program is not effective: Notify the Illinois EPA	Within seven days of the determination
	If Permittee determines the Groundwater Monitoring Program is not effective: Submit a request for permit modification to the Illinois EPA describing any changes to Groundwater Monitoring Program	Within 90 days of the determination
III.I.1	If the Permittee determines that the Groundwater Monitoring Program no longer satisfies the requirements of 35 IAC 724, Subpart F	Within 90 days

SECTION IV: SPECIAL CONDITIONS

Condition	Action	When
IV.A.1	Submit LPC-PA23	With all submittals to Illinois EPA
IV.A.2	Submit 39(i)	If authorized signatory changes
IV.B.1.a	Submit addendum for Condition II.C.7	Within 30 days of the effective date of this Permit
IV.B.1.b	Submit a formal repair and inspection log templates	Within 30 days of the effective date of this permit
IV.B.2.a	Submit a revised cost estimate for post-closure care	Within 60 days of the effective date of this Permit
IV.B.2.b	Submit financial assurance for 30 years of post-closure care amount in Condition II.F.1	Within 60 days of the effective date of this Permit
IV.B.3	Submit a revised survey plat	Within 90 days of the effective date of this Permit
IV.B.4.a	Submit groundwater work plan proposal	Within 90 days of the effective date of this Permit
IV.B.5.a	Submit revised Attachment C-1	Within 180 days of the effective date of this Permit
IV.B.5.b	Submit revised Figure B2	Within 180 days of the effective date of this Permit
IV.B.5.c	Submit revised Figure B3	Within 180 days of the effective date of this Permit
IV.B.5.d	Submit an updated cross-section	Within 180 days of the effective date of this Permit
IV.B.5.e	Submit a Sampling and Analysis plan proposal	Within 180 days of the effective date of this Permit
IV.B.5.f	Submit updated water well survey	Within 180 days of the effective date of this Permit
IV.B.6.a through e	Submit electronic groundwater data between May 19, 2020 to present as specified	Within 180 days of the effective date of this Permit

IV.B.6.f	Notify the Illinois EPA upon submission of specified electronic data (Condition IV.B.6 a through e)	Within 180 days of the effective date of this Permit
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SECTION V: STANDARD CONDITIONS

Condition	Action	When
V.8	Provide information	Upon request
V.11	Report changes to operation	At least 7 days prior to implementation
V.17	Provide oral notice of noncompliance	Within 24 hours of detection of noncompliance or anticipated noncompliance to IEPA and NRC
V.13	Provide written notice of noncompliance	Within 5 days of detection of non-compliance or anticipated noncompliance to IEPA
V.18	Provide written notice of noncompliance that isn't applicable to Conditions 15,16, or 17	Within the next scheduled report to IEPA
V.19	Provide corrections to information	Within 24 hours of detection of inaccurate or incorrect information in the application
V.20.C	Annual Hazardous Waste Report for previous calendar year	Annually, by March 1
V.24	Submit Permit Renewal Application	180 days before this permit expires
V.29	Submit a description of release and any corrective measures taken	Within 30 days of any releases
V.37	Adjust for inflation for post-closure care cost estimate	Annually, either 60 days before anniversary of approval or 30 days before end of fiscal year
V.38	Submit financial assurance for 30 years of post-closure	Within 60 days of the effective date of this Permit
V.39	Notify IEPA of bankruptcy	Within 10 days of filing
	Provide other financial assurance	Within 60 days of filing for bankruptcy

ATTACHMENT A

IDENTIFICATION OF THE APPROVED PERMIT APPLICATION

ILLINOIS EPA No. 0934690001

U.S. EPA No. ILD056625858

REMEDIAL ACTION PLAN PERMIT NO. B-175R2

ATTACHMENT A
IDENTIFICATION OF THE APPROVED PERMIT APPLICATION

This Permit is based on the information in the approved permit application. The approved permit application consists of the following documents:

Document	Dated	Received
RAPP Application	September 29, 2021	September 30 , 2021
--Response to NOD	June 8, 2026	June 9, 2026
--Additional Information	June 15, 2026	June 16, 2026

ATTACHMENT B

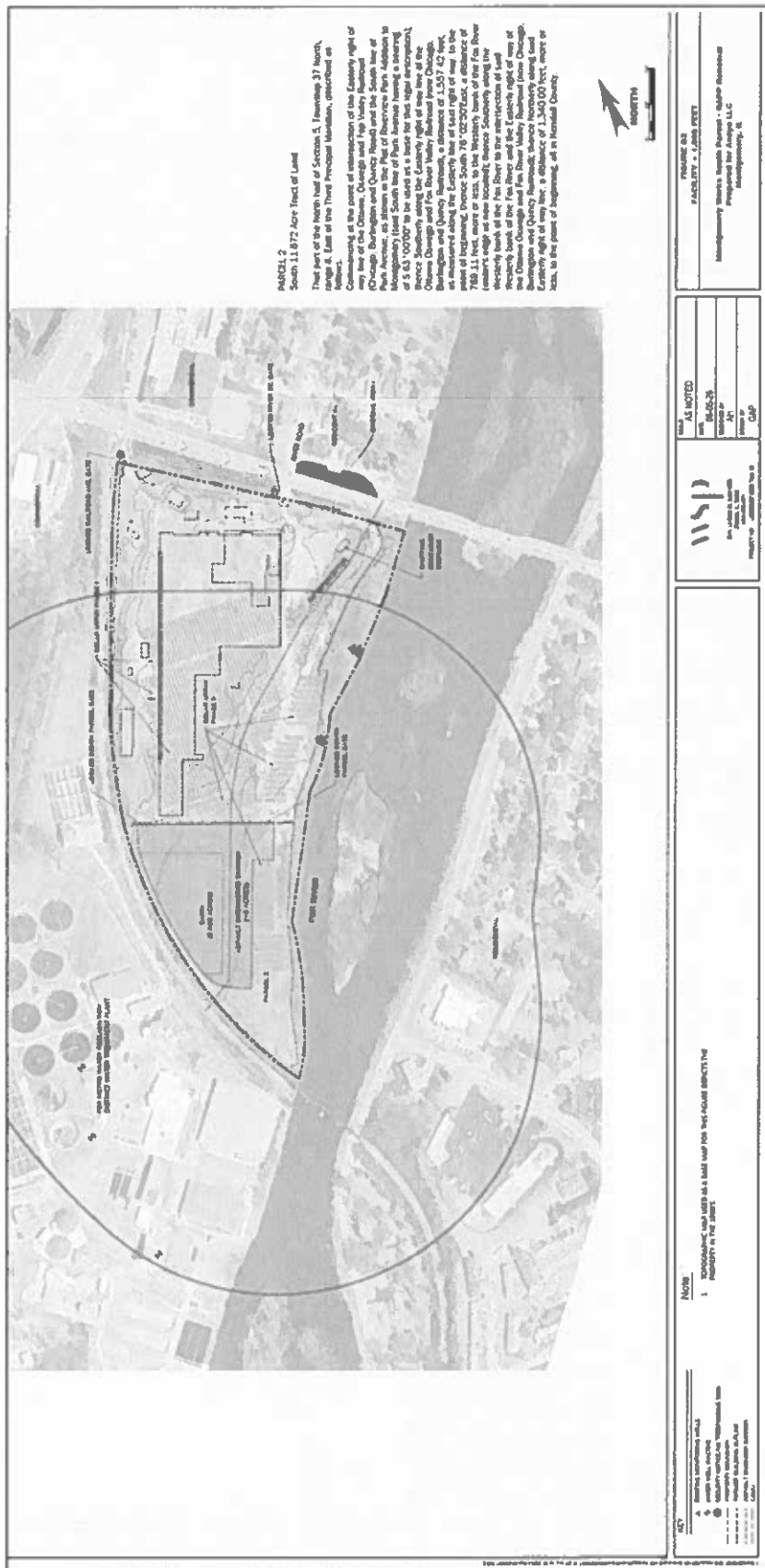
MAPS OF FACILITY

ILLINOIS EPA No. 0934690001

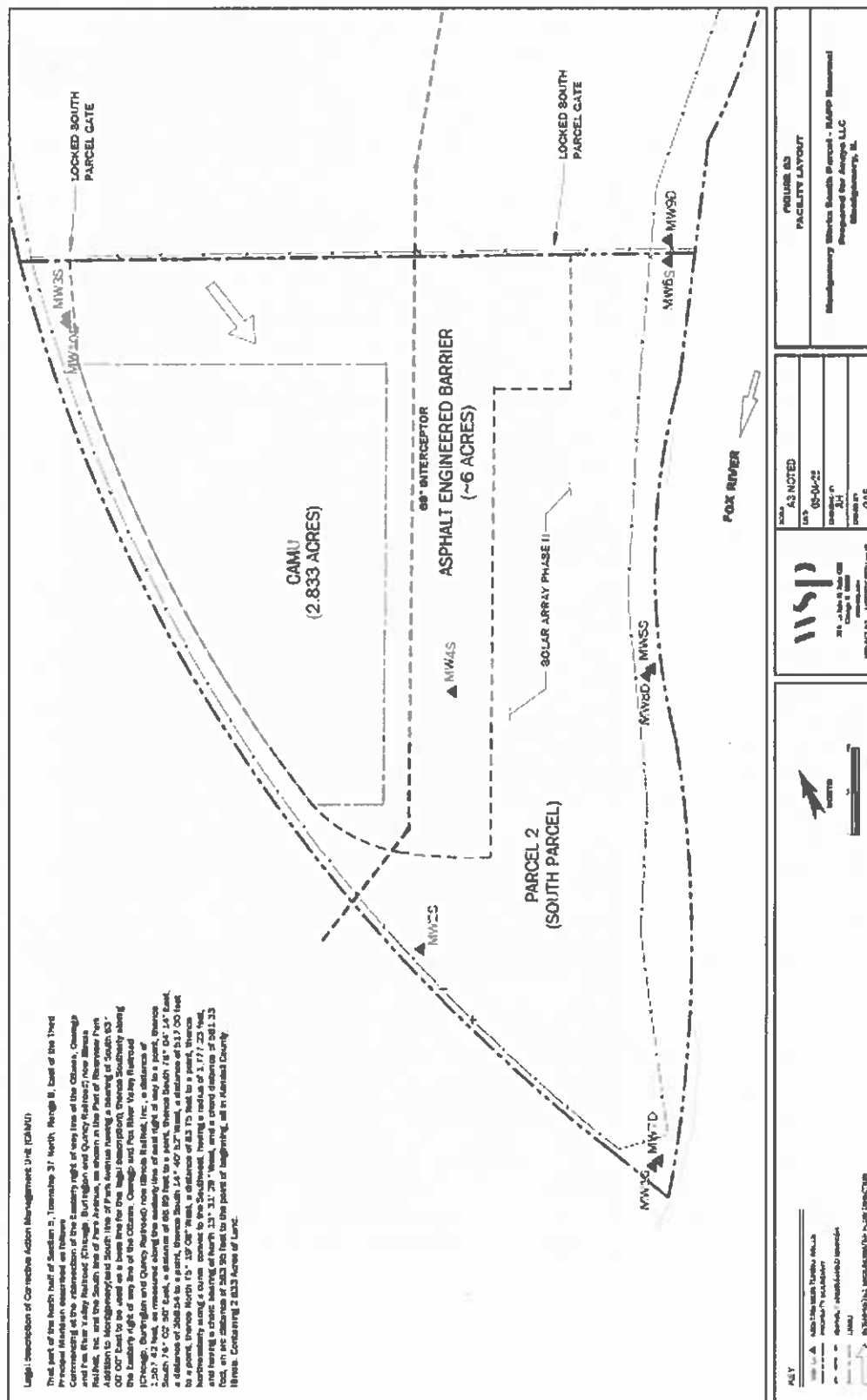
U.S. EPA No. ILD056625858

REMEDIAL ACTION PLAN PERMIT NO. B-175R2

FACILITY



CAMU



ATTACHMENT C

Summary of Inspection Requirements

ILLINOIS EPA No. 0934690001

U.S. EPA No. ILD056625858

REMEDIAL ACTION PLAN PERMIT NO. B-175R2

ATTACHMENT C

SUMMARY OF INSPECTION REQUIREMENTS

Equipment or Area	Action	When
Final Cover Surface	Inspect for growth and overall health	Quarterly and after each major rainfall event
	Inspect for evidence of stress	Quarterly and after each major rainfall event
	Inspect for bare spots from erosion, washout or die-offs, etc.	Quarterly and after each major rainfall event
	Remove vegetation	Annually during periods of dry weather
Final Cover System Integrity	Inspect for erosion resulting in rills, gullies, or bare soil	Quarterly and after each major rainfall event
	Conduct a survey of elevation points checking for settlement and shifting	Every five years
	Inspect for ponding on the final cover	Quarterly and after each major rainfall event
	Inspect for slumping or sloughing of final cover	Quarterly and after each major rainfall event
Corrective Action	Perform inspection of work completed	One month after completing corrective action items

ATTACHMENT D

Groundwater Monitoring Program Attachments

ILLINOIS EPA No. 0934690001

U.S. EPA No. ILD056625858

REMEDIAL ACTION PLAN PERMIT NO. B-175R2

WELL INTEGRITY GUIDANCE

1.1 PURPOSE AND SCOPE

This guidance provides information for determining well integrity during a sampling event.

1.2 WELL INSPECTION

Monitoring wells will be inspected each time the well is used to collect a water level or groundwater sample. Well inspection information will be periodically recorded in the field logbook. Information includes the condition of the well casing, surface completion, protective barriers, as well as water level and total depth. The well inspection information should be periodically evaluated to determine if there are ongoing or potential problems. The first indications of well problems may be a decrease in total depth, the inability to place equipment to the bottom of the well, and the collection of turbid samples. The following information should be collected:

- PID reading at wellhead
- All bolts present?
- Bollard condition (good, damaged, leaning, missing and required, not required)
- Working lock present?
- Working well cap present?
- Well accurately and clearly labeled?
- Well pad condition (good, broken/cracked, floating, not visible [but is present])
- Well Casing Condition (physical integrity, physical stability, downhole camera results)
- Well seal condition (good, moved, incomplete)

1.3.1 Surface Completion Condition

The surface completion condition at each well will be inspected and recorded in the field logbook. The concrete pad, well cover or outer protective casing, well cap and lock, and guard posts should be inspected for proper operation and condition. Recommendations should be made for any repairs or replacement parts needed.

If the well has a dedicated pump or other dedicated equipment, it should also be inspected and deficiencies such as degraded tubing or missing connections should be noted in the field logbook. The annular seal should be intact, and deficiencies should be immediately addressed since the annular seal is critical to ensure the well screen is isolated from intrusion of surface water and other contaminants. Any spiderwebs, ants, fungus, grass, etc. should be removed from within the surface completion.

1.3.2 Water Level and Total Depth

Before any sampling or purging activities are performed, the water level and total depth of every well will be measured and recorded on the appropriate field form (sample collection log, purging and sampling log, water level log, etc). Water levels and total depths should be reviewed periodically to determine if aquifer levels are rising or falling, and as a first indicator of potential well problems, such as silting or a broken casing. Water levels are measured to the nearest 0.01-foot from the top of the well casing (TOC). Total depths, while sometimes difficult to measure, should be measured to the nearest 0.1-foot from the TOC.

The as-built total depth of each well should be available to the field crew so that immediate determination can be made as to possible well problems before sampling or other activities begin. The as-built total depth is also useful for identifying the well if it is not properly marked or there is a chance it could be confused with other wells in a cluster.

If water levels are being collected for the presentation of potentiometric surface, the measurements should be collected in as short a time period as possible (within days). In all cases, a water level and total depth should be measured immediately prior to placing a pump for sampling. The current water level is important so that drawdown during sampling can be accurately determined and monitored. The total depth is important so that proper pump placement can be determined.

Relying on previously collected data increases the possibility of repeating transcription or measurement errors or missing significant changes in the well condition. Significant changes in total depth from either the as-built or the previous measurement should be noted in the field logbook and on the sample collection sheet. Problems installing the sampling pump or other equipment should also be noted on the appropriate form.

1.3.3 Recommendations

Based on the periodic well inspections, water level trends, total depth measurements, and other noted issues like silting or minimal water in the well, maintenance recommendations should be made, if necessary, following each sampling event. Recommendations may include parts replacement or refurbishment, and well rehabilitation, abandonment, or replacement. Well abandonment or replacement recommendations would be appropriate if the well is no longer used or needed, has gone dry due to decreasing aquifer water levels, has well casing damage causing silting or preventing the placement of sampling equipment, or has any issues that may affect the representativeness of the samples collected.

ATTACHMENT E

CERTIFICATION COMPLETION OF POST-CLOSURE CARE

ILLINOIS EPA No. 0934690001

U.S. EPA No. ILD056625858

REMEDIAL ACTION PLAN PERMIT NO. B-175R2

CERTIFICATION OF COMPLETION OF POST-CLOSURE CARE

Avaya Inc. (0934690001) – Kendall County

USEPA ID: ILD056625858

RCRA Permit Log No. B-175R2

To meet the requirements of 35 Illinois Administrative Code (IAC) 724.220, this statement is to be completed by both a responsible officer of the owner/operator (as defined in 35 IAC 702.126) and by a qualified Illinois licensed professional engineer upon completion of post-closure care of the UNIT NAME. Submit one copy of the certification with original signatures and two additional copies.

The hazardous waste management unit closed as a landfill, known as the Corrective Action Management Unit (CAMU), has been closed in accordance with the specifications in the approved closure plan. Post-Closure care required for the CAMU has been provided and completed in accordance with the RCRA Permit. A report documenting that required post-closure care have been carried out and completed in accordance with the approved post-closure care plan is attached.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gather the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS5/44(h))

Facility Name

Printed Name of Responsible Officer

Signature of Owner/Operator
Responsible Officer

Date

Printed Title of Responsible Officer

Signature of Licensed P.E.

Date

Printed Name of Licensed P.E. and
Illinois License Number

Mailing Address of P.E.:

Licensed P.E.'s Seal

