



Illinois Environmental Protection Agency

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JB Pritzker, Governor

James Jennings, Director

217/524-3301

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RETURN RECEIPT REQUESTED

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JUN 30 2026

PERMITTEE

Dyno Nobel, Inc.
Thamara Novak
6640 South Millrock Drive, Suite 150
Salt Lake City, Utah 84121

Re: 1818995004 -- Union County
Dyno Nobel Wolf Lake Facility
USEPA ILD982624777
Log No. B-124R2
Permits Administrative Record - 24D
Permit Draft

Dear Ms. Novak:

Enclosed is a draft renewed Resource Conservation and Recovery Act (RCRA) Hazardous Waste Management Permit (draft permit) for Dyno Nobel, Inc. The draft permit decision is based on the administrative record contained in the Illinois EPA's files. The contents of the administrative record are described in Title 35 Illinois Administrative Code (35 IAC) 705.211.

Under the provisions of 35 IAC 705.141(d), the draft permit and administrative record must be publicly noticed and made available for public review and comment. The Illinois EPA must also provide an opportunity for a public hearing. Copies of the draft permit, fact sheet, and renewal permit application are available for review at the Stinson Memorial Library, located at 409 S. Main Street, Anna, Illinois. The Illinois EPA has not scheduled a public hearing at the current time. However, any interested party may request a public hearing. The public comment period will close on August 23, 2026.

During the comment period, the applicant or any interested party may submit comments to the Illinois EPA on the draft permit. At the close of the comment period, the Illinois EPA will

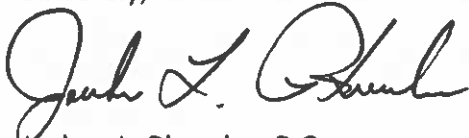
prepare a response to significant comments. Comments on the draft permit may be submitted to:

Sarah Brubaker, Office of Community Relations (#5)
Illinois Environmental Protection Agency
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

The Illinois EPA will issue a final renewed RCRA Hazardous Waste Management permit after the close of the public comment period unless the Illinois EPA decides to reverse the tentative decision. The appeal process and limitations are addressed in 35 IAC 705.212.

For questions regarding groundwater issues, please contact Jordan Simpkins at 217/782-9333 or by email at jordan.simpkins@illinois.gov. For all other questions, contact Jacob Nutt at 217/524-7048 or by email at jacob.nutt@illinois.gov.

Sincerely,



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

JLR:JDN:1818995004-RCRA-B124R2-Draft.docx

JDN TNH AMB

Enclosures: Fact Sheet
Draft Renewed RCRA Permit

cc: Thamara Novak, Dyno Nobel, Inc.
Wayne Weber, Burns McDonnell

FACT SHEET
Draft Renewed RCRA Hazardous Waste Management Permit
Dyno Nobel, Inc.
Wolf Lake, Illinois
Illinois EPA ID No. 1818995004
USEPA ID No. ILD982624777
RCRA Permit Log No. B-124R2

This fact sheet has been prepared pursuant to the requirements of Title 35 Illinois Administrative Code (35 IAC) 705.143. The fact sheet is intended to be a brief summary of the principal facts and significant factual, legal, methodological and policy questions considered in preparing a draft renewed Resource Conservation and Recovery Act (RCRA) permit (draft Permit). This renewed permit reflects the permanent discontinuation of open burning activities and closure of the open burn units at the facility. All reactive waste streams previously treated onsite are now managed at off-site permitted facilities. Pursuant to 35 IAC 705.143(a), this fact sheet is sent to the applicant and to any other person who requests it.

I. INTRODUCTION

The draft Permit for Dyno Nobel, Inc. contains all of the standard conditions required by 35 IAC Parts 702, 703, and 724 for hazardous waste treatment facilities and the applicable conditions of 35 IAC Part 724 for the former treatment of hazardous waste in miscellaneous units. The facility is an existing operating facility.

II. DESCRIPTION OF FACILITY

A. General

The Permittee operates an explosive products manufacturing plant in the town of Wolf Lake in Union County, Illinois. Explosive products are manufactured at the Wolf Lake plant for the commercial blasting industry. The company manufactures cast-boosters and nonelectric initiation systems. Cast boosters are manufactured by melting and mixing trinitrotoluene (TNT) and pentaerythritol tetranitrate (PETN) and then pouring the melted mixture into cardboard molds. Small quantities of cyclonite (ROX), cyclotetramethylene tetra nitramine (HMX) and composition B (a mixture of ROX and TNT) may also be used in the manufacturing process. In the course of manufacturing products, waste explosives are generated in the form of off-specification products, explosive-contaminated materials (e.g., packaging materials, floor sweepings), explosive contaminated wastewater treatment sludge, and explosive contaminated spent activated carbon. Explosives have been manufactured at this location since 1923.

B. Site Description

The facility is located in Union County, Illinois. The address of the facility is:

Dyno Nobel, Inc.
P.O. Box 134
5770 State Rt. 3 North
Wolf Lake, Illinois 62998

The Wolf Lake facility is comprised of approximately 472 acres. A site location map was provided as Figure B-1 of the permit application. A legal description of the property is provided in Exhibit B, Attachment B-2 of the permit application. A facility layout map is provided at the end of this fact sheet.

III. WASTE MANAGEMENT ACTIVITIES AT THE FACILITY**A. Closure of Hazardous Waste Management Units**

This draft Permit addresses the following two miscellaneous units that have ceased operations and are currently undergoing closure in accordance with the previously approved Closure Plan:

Unit Name	Formerly Permitted Capacity	Construction Details	Wastes Managed
Sludge Burn Pad	100 pounds/day	A bermed 11 feet by 21 feet concrete pad lined with refractory material on a bed of sand with a motorized, roll-away metal roof.	Explosive-contaminated sludge, activated carbon, explosive laden sludge filters
Southwestern Bulk Explosive Burn Unit	200 pounds/day /cell	A bermed 2-cell, 20 feet by 36 feet Explosive Burn Pad concrete pad lined with sand with a motorized roll-away metal roof.	D003 (reactive), K044 (listed, reactive) and K045 (listed, reactive)

All waste streams that were previously treated at the Southwestern Bulk Explosive Burn Pad and Sludge Burn Pad must be shipped for off-site disposal at permitted facilities.

Permit Conditions in Section II of the draft Permit are specific to miscellaneous units and implement the regulatory requirements of 35 IAC 724, Subpart X.

The facility is not permitted for on-site storage of hazardous waste. All

hazardous waste streams must be managed within permit exempt, less-than-90 day storage units and satellite accumulation areas in accordance with 35 IAC Part 722.

B. Non-RCRA Waste Management Units

A non-RCRA regulated unit, also located in the vicinity of the hazardous waste management units, the burn cage, is utilized for burning non-hazardous explosives-contaminated material such as packaging, personal protection equipment, rags, air filters and similar items.

There are two other hazardous waste-related operations classified as RCRA exempt wastewater treatment units. The wastewater pre-treatment processes meet the definition of wastewater treatment units as defined in 35 IAC 720.110 and the permitting exemptions under 35 IAC 703.123(e) and 724.101(g)(6).

These operations treat wastewaters from manufacturing operations that generate potentially hazardous wastewaters, and predominantly consist of water from explosive preparation processes, air emission scrubbers, and work area wash down waters.

These wastewaters are pretreated to remove reactive components before re-using and/or discharging the water to the sewer system. Some pretreated wastewater is released on a batch basis after confirmatory sampling for final treatment at the Wolf Lake publicly owned treatment works (POTW), where such discharge is subject to the permit requirements issued by the Illinois EPA Bureau of Water.

IV. HAZARDOUS WASTE CLEANUP UNDER RCRA CORRECTIVE ACTION

In accordance with Section 3004 (u) and (v) of RCRA and 35 IAC 724.201, the Permittee must institute such corrective action as necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents from any solid waste management unit (SWMU) at the facility. The original RCRA permit was issued by the Illinois EPA for this facility on April 21, 2000 (Log No. B-124) and the first renewal (Log No. B-124R) was issued on September 8, 2011. Section III of the current RCRA permit (Log No. B-124R and its modifications) contained corrective-action requirements for 35 SWMUs. The Permittee has conducted a substantial amount of investigation/remediation to date to meet these requirements and has completed corrective action efforts, with certain conditions, at 32 of these units. The Permittee must still complete corrective action at three SWMUs within the facility.

Several former interim status hazardous waste management units at this facility have been remediated in accordance with RCRA closure plans approved by Illinois EPA. Furthermore, some non-hazardous waste management units at the facility were properly remediated before the issuance of the facility's RCRA permit in 2000.

Several non-hazardous waste surface impoundments once present at the facility were closed as landfills in the early 1990s. Wastes from the remediation of several other units were placed in those impoundments before they were closed. The Permittee must provide post-closure care for these units (referred to as "Gypsum Ponds" and "Ball Powder Ponds") including implementation of a groundwater monitoring program set forth in Section II of this permit.

The Permittee must provide corrective action, as appropriate, for any future releases from SWMUs or areas of concern (AOCs) discovered at the facility.

V. STANDARD PERMIT CONDITIONS

Standard Permit Conditions 1 through 69 in Section VI of the draft Permit are regulatory requirements of 35 IAC Parts 702, 703, and 724. These conditions are of a general nature and applicable to all hazardous waste management facilities regulated pursuant to an Illinois EPA RCRA Permit. These conditions include the effectiveness of the permit, permit actions, severability, permit expiration, monitoring and retention of records, transfer of permits, and compliance schedules.

VI. CONSIDERED PERMIT ACTIONS OTHER THAN RCRA

A. Air

The air emissions from a hazardous waste management facility are regulated under the Clean Air Act (CAA), the Illinois Environmental Protection Act (Act), and State regulations at 35 IAC, Subtitle B: Air Pollution. Under these regulations, Dyno Nobel (Bureau of Air ID# 181864AAB) does not require an individual air permit; instead, the facility maintains enrollment in the Registration of Smaller Sources (ROSS) program under registration number 92020075.

B. Water

A discharge of any wastewaters from a hazardous waste management facility into the water of the State is required to have a national pollutant discharge elimination system (NPDES) permit, issued by the Illinois EPA under Section 39(b)

of the Act. Dyno Nobel has a NPDES permit, ILR001014, for storm water discharges from the facility, and an authorization to discharge the pretreated wastewater to the Wolf Lake sewer system under permit 2023-EP-68591.

VII. PROCEDURES FOR REACHING A FINAL DECISION

Pursuant to 35 IAC 705.162(a)(2), the public is given 45 days to review the application and draft permit and provide comments on the draft Permit conditions prior to the Illinois EPA taking any final permitting action on the application for this draft permit. The comment period will begin on, July 9, 2026, the date of the first publication of the public notice in the Anna Gazette Democrat. The comment period will end on August 23, 2026.

Copies of the permit application, draft Permit, and fact sheet are available for review at:

Stinson Memorial Library
409 S. Main Street
Anna, Illinois, 62906

The administrative record contains the permit application, draft Permit, fact sheet, and other supporting documents and correspondence submitted to the Illinois EPA. The administrative record can be made available for public inspection by appointment only at the Illinois EPA's Springfield headquarters from 9:00 a.m. to 5:00 p.m., Monday through Friday. Inspections of the administrative record must be scheduled in advance by contacting the Office of Community Relations at the address listed below.

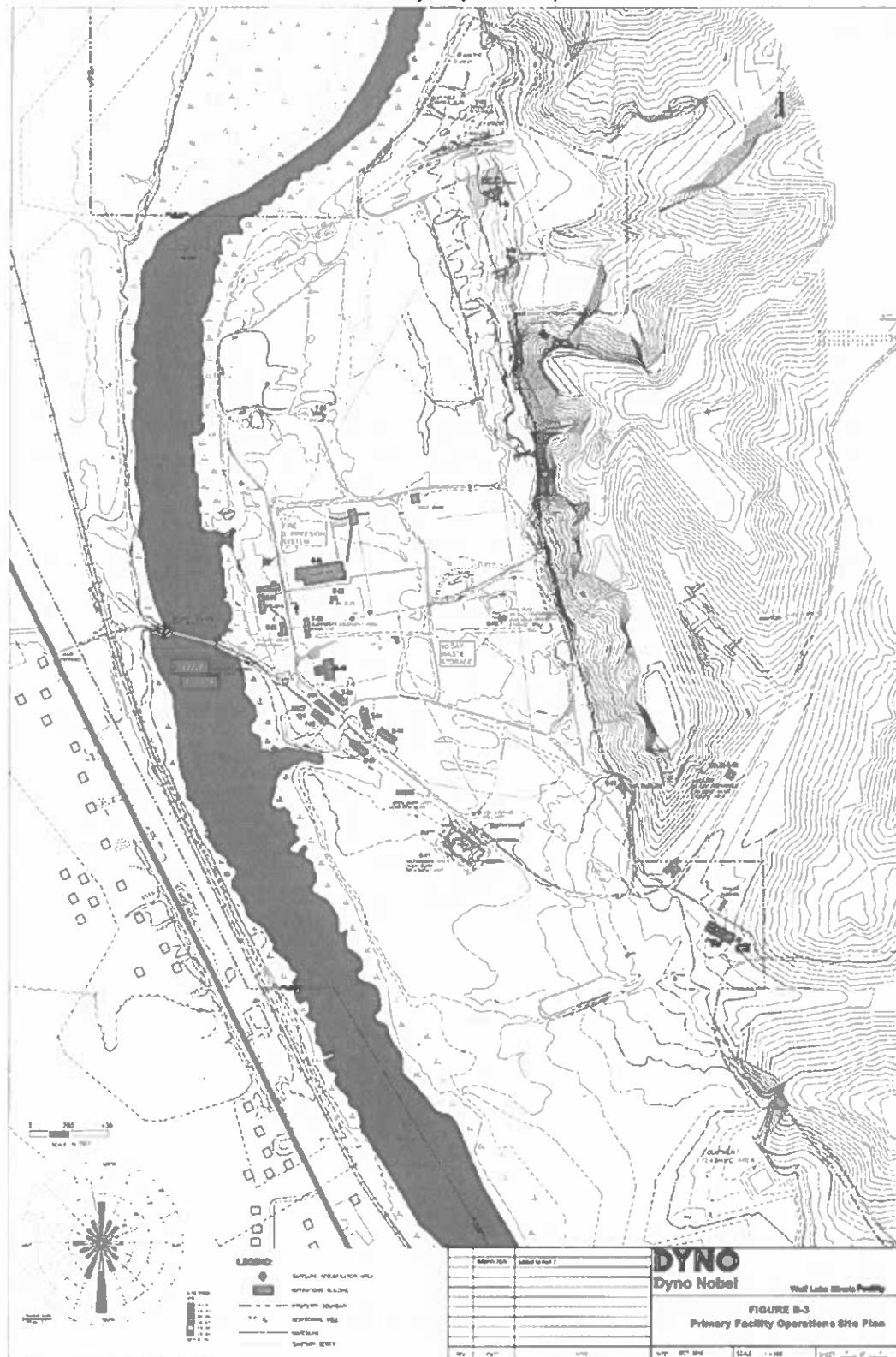
In response to requests received during the comment period or at the discretion of the Illinois EPA, a public hearing may be held to clarify one or more issues concerning the permit application. A request for a public hearing must be submitted in writing, must indicate opposition to the draft Permit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

For further information regarding the permit process, to submit written comments on the draft Permit, or to request a public hearing, please contact Sarah Brubaker at 217-786-0790 or by email at sarah.brubaker@illinois.gov:

Office of Community Relations (#5)
Illinois Environmental Protection Agency
2520 West Iles Avenue
P.O. Box 19276
Springfield, Illinois, 62794-9276

When the Illinois EPA makes its final permit 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 permit will become effective 35 days after service of notice of the decision or at a later date if stated in the permit.

Facility Layout Map





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 HAZARDOUS WASTE MANAGEMENT PERMIT

1818995004 -- Union County
Dyno Nobel, Inc.
USEPA ILD982624777
Log No. B-124R2
RCRA Permits Administrative Record - 24D

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

PERMITTEE

Dyno Nobel, Inc.
Thamara Novak
6640 South Millrock Drive, Suite 150
Salt Lake City, Utah 84121

FACILITY LOCATION

5570 North State Route 3
Wolf Lake, Illinois 62998-1150

A renewed Resource Conservation and Recovery Act (RCRA) hazardous waste permit is hereby granted to Dyno Nobel, Inc. as Owner, Operator, and Permittee pursuant to Section 39(d) of the Illinois Environmental Protection Act (Act) and Title 35 Illinois Administrative Code Subtitle G (35 IAC).

PERMITTED HAZARDOUS WASTE ACTIVITY

The Permit allows Dyno Nobel, Inc. to conduct the following hazardous waste activities in accordance with the approved permit application and conditions of this Permit:

1. **RCRA Closure of Open Burning/Open Detonation (X01) Units**
2. **Groundwater Monitoring under Corrective Action Program**
3. **Corrective Action for several Solid Waste Management Units**

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

This Permit is issued based on the information submitted in the approved permit applications identified in Attachment C of this Permit and any subsequent amendments. Any inaccuracies found in the information provided in the 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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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
9511 Harrison Street, Des Plaines, IL 60016 • 847-294-4000
2309 W. Main Street, Suite 116, Marion, IL 62959 • 618-993-7200
4302 N. Main Street, Rockford, IL 61103 • 815-987-7760

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RCRA PERMIT ISSUED TO

Dyno Nobel, Inc.

**Wolf Lake, Illinois
Union County**

**STATE ID No: 1818995004
USEPA ID No: ILD982624777
Log No. B-124R2**

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SECTION I – GENERAL FACILITY DESCRIPTION

A. OWNER/OPERATOR

1. The facility is owned and operated by Dyno Nobel, Inc., and herein referred to as the "Permittee". (35 IAC 702.121, 702.123, and 703.181)

Dyno Nobel, Inc.
5570 North State Route 3
Wolf Lake, Illinois 62998-1150

2. The facility contact is:

Thamara Novak
Environmental Manager
Dyno Nobel, Inc.
6640 South Millrock Drive, Suite 150
Salt Lake City, Utah 84121

B. LOCATION

1. Location of Facility

The facility is located in Union County in Illinois. Dyno Nobel owns approximately 472 acres at this location. The facility is located at:

Dyno Nobel, Inc.
5570 North State Route 3
Wolf Lake, Illinois 62998-1150

2. Facility Layout Maps

The general location of the facility is shown in Figure B-1 of the application. The location of all RCRA and solid waste management units (SWMU) are depicted in Figure K-1 of the approved permit application. The facility layout map is provided as Attachment D to this Permit.

C. DESCRIPTION OF HAZARDOUS WASTE MANAGEMENT ACTIVITIES

The facility has been operating as an explosives manufacturer since 1923 and previously conducted open burning operations which have ceased operation since September 1, 2021. Past activities besides open burning, included on-site disposal of the wastes, open

detonation, and spray irrigation of nitrate laden wastewaters.

This permit addresses two miscellaneous units that have ceased operations and are currently undergoing RCRA closure in accordance with the approved Closure Plan.

There is a two-cell bulk explosive bermed concrete burn pad, 20 feet by 36 feet, lined with sand and equipped with a motorized, roll-away metal roof. The berm consists of a concrete curb (eight inches high), above surrounding grade, which prevents rainfall run-on. The interior of the unit is sloped to a drainage trough which directs any liquid which may accumulate in the pad to a sump for collection and removal.

There is a sludge burn unit consisting of a bermed, sloped 11 feet by 21 feet concrete pad lined with refractory material and a motorized, roll-away metal roof.

On August 18, 2021, in a RCRA Permit modification request (Log No. B-124R-M-4), the Permittee informed the Illinois EPA that open burning activities at the miscellaneous units ceased in September 2021. All waste streams that were treated in these units have been disposed at off-site permitted facilities.

A non-RCRA regulated unit, also located in the vicinity of the two miscellaneous units, the burn cage, is utilized for burning non-hazardous explosives-contaminated material such as packaging, personal protection equipment, rags, air filters, and similar items.

There are two other hazardous waste-related operations classified as exempt wastewater treatment units. The wastewater pre-treatment processes meet the definition of wastewater treatment units as defined in 35 IAC 720.110 and the permitting exemptions under 35 IAC 703.123(e) and 724.101(g)(6). These operations treat wastewaters from manufacturing operations that generate potentially hazardous wastewaters, and predominantly consist of water from explosive preparation processes, air emission scrubbers, and work area wash down waters. These wastewaters are pretreated to remove reactive components before re-using and/or discharging the water to the sewer system. Some pretreated wastewater is released on a batch basis after confirmatory sampling for final treatment at the Wolf Lake Publicly Owned Treatment Works (POTW), where such discharge is subject to the permit requirements.

The facility has no permitted storage for hazardous waste on site. All storage of hazardous waste streams conform to the less-than-90-day storage and satellite accumulation area RCRA regulations.

The facility is conducting a groundwater monitoring detection program to determine if any hazardous constituents are leaving SWMUs closed as landfill units.

The original RCRA permit was issued by the Illinois EPA for this facility on April 21, 2000;

Section II of the Permit contained corrective action requirements for 35 SWMUs. The Permittee has conducted a substantial amount of investigation/remediation to date to meet these requirements and has completed corrective action efforts, with certain conditions, at 32 of these units. The Permittee must still complete corrective action at three SWMUs within the facility.

Several former interim status hazardous waste management units at this facility have been remediated in accordance with RCRA closure plans approved by Illinois EPA. Furthermore, some non-hazardous waste management units at the facility were properly remediated before the issuance of the facility's RCRA Permit in 2000. Several non-hazardous waste surface impoundments once present at the facility were closed as landfills in the early 1990s. Waste from the remediation of several other units were placed in those impoundments before they were closed. The Permittee must provide post-closure for these units (referred to as the "Gypsum Ponds" and "Ball Powder Ponds") including implementation of a groundwater monitoring program set forth in Section III of this Permit.

SECTION II – CLOSURE OF MISCELLANEOUS UNITS**A. SUMMARY**

The regulated units at the Dyno Nobel facility consist of two Miscellaneous Units: the Sludge Burn Pad and the Southwestern Bulk Explosive Burn Unit. Operation of these units began in 1923 and remained unchanged until April 21, 2000, when the issuance of RCRA permit B-124 mandated facility modifications. These modifications required the installation of liners and the construction of motorized metal roofs for the Miscellaneous Units, as well as a concrete pad for the Southwestern Bulk Explosive Burn Unit.

In September 2021, the Permittee notified the Illinois EPA that open burning activities at the facility ceased in its permit modification request (Log No. B-124R-M-4). All waste streams previously treated in the miscellaneous units are now shipped offsite for disposal at permitted facilities. This section outlines the clean closure requirements for these former regulated units in accordance with 35 IAC 724.211. Additionally, this Permit establishes requirements for post-closure care in the event that all hazardous wastes and contaminated soils cannot be practicably removed or remediated according to the approved closure plan and this Permit.

B. DESCRIPTION OF MISCELLANEOUS UNITS SUBJECT TO CLOSURE

1. The Permittee formerly treated wastes identified by the hazardous waste codes D003 (reactive), K044 (listed, reactive) and K045 (listed, reactive), in the following hazardous waste management units:

Miscellaneous Unit	Formerly Permitted Capacity	Unit Description
Sludge Burn Pad	100 pounds/day	A bermed 11 feet by 21 feet concrete pad lined with refractory material on a bed of sand with a motorized, roll-away metal roof.
Southwestern Bulk Explosive Burn Unit	200 pounds/day/cell	A bermed 2-cell, 20 feet by 36 feet Explosive Burn Pad concrete pad lined with sand with a motorized roll-away metal roof.

2. Sludge Burn Pad – Prior to the issuance of RCRA Permit (Log No. B-124) on April 21, 2000, the Sludge Burn Pad was utilized to burn explosive-contaminated sludge, activated carbon, explosive laden sludge filters and similar wastes in order to render them non-reactive. The Sludge Burn Pad consisted of a bermed, sloped concrete pad which was then modified to be lined with refractory

material and construction of a motorized, roll-away metal roof. The operation of the Sludge Burn Pad was unchanged from that point until ceasing operation on September 1, 2021.

3. Southwestern Bulk Explosive Burn Unit - Prior to the issuance of RCRA permit B-124 on April 21, 2000, the Southwestern Bulk Explosive Burn Unit was utilized to treat major reactive waste streams and potentially dangerous non-hazardous waste streams generated at the facility by open burning of the wastes. The Southwestern Bulk Explosive Burn Unit was originally an uncovered and unlined sand pit which was modified to be lined along with construction of a concrete pad and a roll-away metal roof. After these modifications the Southwestern Bulk Explosive Burn Unit remained unchanged until ceasing operation on September 1, 2021.

C. RECORDING AND MAINTAINING DATA

1. The Permittee must record monitoring and inspection data in their records. The Permittee must maintain those records for three years and make this information available to the Illinois EPA personnel or their designees through an intergovernmental agreement upon request.
2. The Permittee must maintain records of each instance when the Contingency Plan is implemented as part of their records. The record must include the date and time of the incident and a brief description of the events that occurred, cause of the incident and corrective measures taken to correct the situation and prevent its recurrence.
3. Any records for waste generation, removal, and any closure activities must be documented, reported, as necessary, and maintained at the facility.

D. CLOSURE REQUIREMENTS

At closure, at a minimum, all waste, waste residues, and hazardous constituents must be removed from the units. Remaining wastes, liner, and underlying soil containing or contaminated with waste, waste residue, or hazardous constituents must also be removed/remediated as appropriate to meet the requirements of 35 IAC 742. Closure of the Miscellaneous Units must be carried out in accordance with the approved closure plan.

1. The closure plan for the units identified in Condition II.B.1 was approved by the Illinois EPA on July 10, 2025 (Log No. B-124R-M-4). The Permittee must remove all waste and waste residues from the miscellaneous units and complete RCRA

closure including all sampling and testing in accordance with the approved closure plan included in the approved permit application.

2. The Permittee must provide post-closure care in accordance with 35 IAC Part 724 for the miscellaneous units if all of the hazardous wastes or contaminated soils cannot be practicably removed or decontaminated in accordance with the closure requirements outlined in this Permit and in the approved closure plan. If it is determined that the clean closure requirements cannot be met and post-closure care is required, this Permit must be modified to require post-closure care of the miscellaneous units in accordance with 35 IAC 724, Subparts G and H.
3. Should post-closure care, as described in Condition II.D.2, become necessary, the Permittee must submit an application for modification to this Permit, including an amended closure and post-closure care plan for the affected units within 30 days following discovery that clean closure cannot be accomplished. If a determination is made not to pursue clean closure prior to the implementation of the closure plan for the miscellaneous units, the modification request must be made no later than 60 days after the determination is made.
4. Within 60 days after closure of the miscellaneous units is complete, the Permittee must submit a closure certification to the Illinois EPA that the unit has been closed in accordance with the approved closure plan. The closure certification form, "Certification of Completion of RCRA Closure" is provided in Attachment A to this Permit. Signatures must meet the requirements of 35 IAC 720.126. The qualified Illinois licensed professional engineer (P.E.) must be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the P.E. must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for each miscellaneous unit identified in Condition II.B.1 to meet the requirements of Condition II.E.
5. A Closure Documentation Report must be submitted with the closure certification form which includes the following items, if applicable:
 - a. Summary of pre-closure meetings, inspection reports and daily logs maintained during closure;
 - b. The volume of waste and waste residue removed, including wastes resulting from decontamination activities;
 - c. A description of the method of waste handling and transport;

- d. Hazardous waste determination results, description of waste handling and transport, and copies of waste manifests;
 - e. A description of the sampling, analytical methods used, including sample preservation methods and chain-of-custody information, and analytical results and evaluation;
 - f. Any other tests performed, methods, and results associated with management of wastes or contaminated media;
 - g. A summary of all releases of waste from the miscellaneous units including the date of the release, approximate amount of waste released, and the type of waste released;
 - h. A chronological summary of closure activities and the cost involved;
 - i. Color photographs of closure activities which document conditions before, during and after closure;
 - j. All minor modifications made to the approved closure plan and a discussion on how the determination of minor modification was made;
 - k. A scale drawing of all excavated or decontaminated areas and sample locations; and
 - l. Demonstration that the unit meets the requirements of closure by removal or decontamination. If such a demonstration cannot be made, a post-closure care plan in accordance with Condition II.D.3 must be submitted.
6. The Permittee must obtain any necessary permits for waste disposal prior to initiating excavation activities. The Permittee must not create regulated waste pile units by storing the excavated hazardous waste in piles. The 90-day accumulation time exemption (35 IAC 722.117) only applies to containers and tanks.
7. Hazardous waste operations and emergency response activities conducted under this Permit must be in accordance with the requirements of 29 Code of Federal Regulations (CFR) Part 1910.
8. If the Illinois EPA determines that implementation of the approved closure plan

fails to satisfy the requirements of 35 IAC 724.211, the Illinois EPA reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Sections 39(a) and 40(a) of the Act.

9. The Permittee during closure of the miscellaneous units must analyze all samples individually (i.e., no compositing). Sampling and analytical procedures must be conducted in accordance with Test methods for Evaluating Solid Wastes, Physical/Chemical Methods, Third Edition (SW-846) and finalized updates. Sample size per interval must be minimized to prevent dilution of any contamination. Apparent visually contaminated material within a sampling interval must be included in the sample portion of the interval to be analyzed. To demonstrate a parameter is not present in a sample, analysis must be conducted in accordance with the latest edition of SW-846 at a lab accredited by National Environmental Lab Accreditation Program (NELAP) and Lower Limit of Quantitation (LLOQ) for that parameter must be the lowest concentration that can be reliably measured with acceptable precision and accuracy in accordance with SW-846.
10. Regarding groundwater monitoring for the Miscellaneous Units and SWMU 33, the following must be met
 - a. The miscellaneous unit wells and piezometers listed in Condition III.C.1.b remains suspended, the Permittee must maintain these wells and piezometers for closure verification sampling as specified in the approved Closure Plan;
 - b. The interim status groundwater monitoring program for SWMU 33 was suspended in a permit modification approved on July 10, 2025 (Log No. B-124R-M-4), the Permittee must maintain the existing groundwater monitoring wells in functional condition for use during closure activities; and;
 - c. Upon submittal of a closure documentation report to the Illinois EPA and subsequent approval which certifies clean closure of the Miscellaneous Units, the Permittee may request to terminate the groundwater monitoring program.

E. FINANCIAL ASSURANCE REQUIREMENTS

1. The permittee shall maintain financial assurance for closure of the two Miscellaneous Units identified in Condition II.B.1 of at least \$179,445 (in 2024 dollars). The cost estimate for closure of these units is shown in Attachment B to

this permit. The financial assurance maintained by the facility shall be sufficient to meet the requirements at 35 IAC 724, Subpart H.

2. The Permittee must provide financial assurance for the cost estimate amount in Condition II.E.1 and Attachment B in accordance with 35 IAC 724, Subpart G. The approved closure cost estimate must be adjusted annually for inflation.
3. A revised closure cost estimate for the two Miscellaneous Units must be submitted with the schedule for the closure for the units when an approved closure plan is revised and as required in Condition II.D.4. Such cost estimate must include all activities necessary to initiate and complete the closure of the units. Appropriate documentation of financial assurance in at least the amount of the approved cost estimate must be submitted to Illinois EPA within 60 days after the cost estimates are approved.
4. If clean closure cannot be achieved for the two Miscellaneous Units, the units will be subject to post-closure care, including the requirements for financial assurance.
5. Financial assurance for closure and post-closure of any miscellaneous unit being closed as a landfill, when required in accordance with Conditions II.D.2 and II.D.3, must be updated within 30 days following modification of the permit under the provisions of Condition II.D.3.

SECTION III - GROUNDWATER MONITORING PROGRAM

A. SUMMARY

1. 35 IAC 724.201(a) requires owner and operators of facilities seeking a permit to treat, store or dispose of hazardous waste to institute corrective action, as necessary, to protect human health and the environment for all releases from any SWMU, regardless of the time at which waste was placed in such a unit.
2. The closed non-RCRA Gypsum and Ball Powder Ponds were certified closed by the Illinois EPA on October 7, 1992. The following groundwater monitoring system must be implemented at the facility during the post-closure care for the closed non-RCRA Gypsum and Ball Powder Ponds.

B. IMPLEMENTATION

1. The Permittee must implement the groundwater monitoring program established herein, upon the effective date of this Permit.
2. The Permittee must carry out the monitoring specified in this Permit on the groundwater present beneath the Permittee's closed non-RCRA Gypsum Ponds and Ball Powder Ponds at the facility. The uppermost aquifer beneath the ponds is defined as the "lower sand aquifer". This unit occurs from approximately 35 to 50 feet below ground surface (bgs) and consists of a fine-to-medium-grained continuous sand.
3. For the purposes of this Permit and in accordance with 35 IAC Part 620, the uppermost aquifer has been designated Class I: Potable Resource Groundwater.

C. WELL LOCATIONS AND CONSTRUCTION

The Permittee must install and maintain a groundwater monitoring system at the point of compliance as specified below:

1. The Permittee must maintain the groundwater monitoring wells and piezometers identified in the tables below to allow for the collection of groundwater samples and elevations from the uppermost aquifer. The locations of the wells and piezometers are specified on Figures B-2A and B-2B in the approved permit application:

a. Closed Non-RCRA Gypsum and Ball Powder Pond Wells

Illinois EPA Well No.	Facility Well No.	Well Depth (Ft. bgs.)	Elevation (Ft. MSL)	Well Screen Interval (Ft. MSL)
R01S	R-1s	35.65	326.94	336.94-326.94
G01D	W-1d	45.42	317.34	327.34-317.34
G03S	W-3s	34.81	321.67	326.67-321.67
G03D	W-3d	41.47	315.20	325.20-315.20
G104*	W-4*	32.99	324.83	329.83-324.83
G06S*	W-6s*	35.54	320.01	325.01-320.01
G07D*	W-7d*	51.85	305.16	315.16-305.16
G08D*	W-8d	51.83	303.96	313.96-303.96
G09S	W-9	59.77	296.21	306.21-296.21
G09D	W-9d	51.65	304.50	314.50-304.50
G10D	W-10d	51.77	304.22	314.22-304.22
G112	W-12	51.29	305.84	315.84-305.84
G113	W-13	40.00	316.77	326.71-316.77
G15S	W-15s	31.88	323.21	333.21-323.21
G15D	W-15d	61.15	293.88	303.88-293.88
G16S	W-16s	42.23	314.57	324.57-314.57
G16D	W-16d	62.46	294.16	304.16-294.16

*Denotes Upgradient Well(s)

b. Miscellaneous Units Wells & Piezometers

Illinois EPA Well No.	Facility Well No.	Well Depth (Ft. bgs.)	Elevation (Ft. MSL)	Well Screen Interval (Ft. MSL)
G130*	W-30*	37.08	319.38	329.38-319.38
G131	W-31	41.84	315.17	325.17-315.17
G132	W-32	42.51	311.24	321.24-311.24
G133	W-33	56.84	297.26	307.26-297.26
G134	W-34	46.74	307.76	317.76-307.76
G135	W-35	45.10	309.42	318.89-309.42
P101	DMP-1	41.71	314.48	324.48-314.48
P102	DMP-2	41.97	314.80	324.80-314.80
P103	DMP-3	45.19	311.07	321.07-311.07
P104	DMP-4	41.98	315.09	325.09-315.09
P105	DMP-5	44.90	319.70	329.70-319.70
P106	DMP-6	17.21	340.10	347.10-340.10
P107	DMP-7	25.63	328.13	336.13-328.13

*Denotes Upgradient Well(s)

2. Construction of each new monitoring well/piezometer must be in accordance with the diagram found on the Illinois EPA website. All new monitoring well/piezometers to be installed must be continuously sampled and logged in Illinois EPA boring logs, unless otherwise approved by the Illinois EPA. An Illinois EPA boring log s found on the Illinois EPA's website.
3. 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 must accompany this notification. The well must not be plugged until the new well is on-line 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 must obtain written approval from the Illinois EPA regarding the proposed installation procedures and construction.
4. Should any well become consistently dry or unserviceable, a replacement well must be installed within 10 feet of the existing well. This well must monitor the same zone as the existing well and be constructed in accordance with the current Illinois EPA groundwater monitoring well construction standards at the time the wells are replaced. A replacement 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 as a new well.
5. The Permittee must submit boring logs, construction diagrams and data sheets from 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 must submit certification that plugging and abandonment of a well was carried out in accordance with the approved procedures to the Illinois EPA at the address below 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
P. O. Box 19276
Springfield, Illinois 62794-9276

6. All wells/piezometers must be equipped with protective caps and locks. Monitoring wells or piezometers located in high traffic areas must be protected

with bumper guards.

7. All wells/piezometers not utilized in the approved groundwater monitoring program (see Condition III.C.1.b), but retained by the facility, must be constructed and maintained in accordance with 77 IAC Part 920.

D. MONITORING PARAMETERS

1. The Permittee must determine the groundwater quality at each well identified in Condition III.C.1.a at an upgradient or other wells annually during the active life (including the closure and post-closure care periods) of the units. Samples collected during the annual sampling event of each year must be analyzed for the field parameters and the constituents below:

LIST G-1 (Groundwater - Annually)

<u>FIELD PARAMETERS</u>	<u>STORET</u>	<u>UNIT</u>
pH	00400	Standard Units
Specific Conductance	00094	µmhos/cm
Temperature of Water Sample	00011	°F
Turbidity	45626	Ntus
Depth to Water (below land surface)	72019	Feet (Ft)
Depth to Water (below measuring point)	72109	Ft
Elevation of Measuring Point (top of casing)	72110	Ft MSL
Elevation of Groundwater Surface	71993	Ft MSL
Elevation of Bottom of Well	72020	Ft MSL

Inorganic Parameters

Nitrate-Nitrogen	00620	mg/L
Sulfate (Dissolved)	00946	mg/L
Total Dissolved Solids (TDS Dissolved)	70300	mg/L

NOTES:

- i. All parameters with the "(Dissolved)" label to the right must be determined using groundwater samples which have been filtered through a 0.45-micron filter. All other parameters must be determined from unfiltered samples.
- ii. The monitoring results should be reported in ug/L units unless otherwise

indicated.

- iii. The preceding list of parameters (List G-1), includes those from 35 IAC 620.410, designated with (#) which are required to be monitored annually and may not be deleted.
2. Background concentrations utilized for those constituents in List G-1 must be those established using the groundwater monitoring data collected during the interim status period at the closed non-RCRA Gypsum and Ball Powder Ponds (1992 through 2000).
3. 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 Environmental Protection 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.

E. DETECTION MONITORING PROGRAM

1. The Permittee must determine groundwater quality at each monitoring well identified in Condition III.C.1.a annually during the active life of the ponds (including closure and post-closure care periods). The Permittee must express the groundwater quality at each well in a form necessary for the determination of statistically significant changes (i.e., means, variances, etc.).
2. The Permittee must determine and report to the Illinois EPA the groundwater flow rate and direction in the uppermost aquifer annually from the monitoring wells listed in Condition III.C.1.a.
3. The Permittee must determine whether there is a statistically significant increase (or decrease in the case of pH) over the background values established for each parameter identified in Condition III.D.1, each time the groundwater quality is determined at each well. In determining whether such a change has occurred, the Permittee must compare the groundwater quality at each monitoring well specified in Condition III.C.1 to the background value derived in accordance with the statistical procedures specified in Section C of the approved Permit

Application.

F. GROUNDWATER ELEVATIONS

1. The Permittee must determine the groundwater surface elevation referenced to mean sea level (MSL) at each well each time a groundwater sample is collected in accordance with Condition III.I.3.
2. The Permittee must determine the surveyed elevation of the "stick-up" referenced to MSL when the well is installed (with as-built diagrams) and every five years, or at the request of the Illinois EPA; or whenever the elevation changes in accordance with Condition III.I.5. "Stick-up" refers to the height of the referenced survey datum. This point is determined within ± 0.01 foot in relation to mean sea level, which in turn is established by referenced 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 least annually. The mandatory measurement must be taken, collected and submitted to the Illinois EPA in accordance with the schedule found in Condition III.I.2.

G. SAMPLING AND ANALYSIS PROCEDURE

The Permittee must use the techniques and procedures described in Section K of the approved permit application when obtaining and analyzing samples for the groundwater monitoring wells identified in Condition III.C.1.a:

1. Samples must be collected by the techniques described in Section K of the approved permit application.
2. Samples must be preserved, shipped and handled in accordance with the procedures specified in Section K of the approved permit application.
3. Samples must be analyzed in accordance with the procedures specified in Section K 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 Waste, Physical/Chemical Methods," Third Edition (SW-846) and finalized updates.
4. Samples must be tracked and controlled using the chain-of-custody procedures specified in Section K of the approved permit application.

H. STATISTICAL PROCEDURES

The Permittee shall use the statistical procedures described in Section K of the approved permit application, except as modified herein, when evaluating results in accordance with Condition III.E.3. These are in keeping with USEPA's Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities - Unified Guidance (March 2009).

I. REPORTING AND RECORDKEEPING

1. The Permittee must enter all monitoring, testing and analytical data obtained in accordance with Conditions III.D, III.E, III.F, III.G, and III.H into the operating record. The data must include all computations, calculated means, variances, t-statistic values, and t-test results or results of statistical tests that the Illinois EPA has determined to be equivalent.
2. Samples collected to meet the requirements of the groundwater monitoring program described in Conditions III.D, III.E, III.F, III.G, and III.H shall be collected and reported as identified in the table below. All additional information required by the groundwater monitoring program (as specified in Conditions III.D, III.E, III.F, III.G, and III.H) shall also be submitted to the Illinois EPA at the address listed in Condition III.C.5 in accordance with this schedule:

<u>Sampling Event of Calendar Year:</u>	<u>Results Submitted to Illinois EPA by:</u>	<u>Constituent List:</u>
Second Quarter (April - May)	July 15	G-1

3. Groundwater surface elevation data measured pursuant to Condition III.F.1 must be collected annually and submitted to the Illinois EPA in accordance with the schedule found in Condition III.I.2.
4. The Permittee must report the groundwater flow rate and direction in the uppermost aquifer, as required by Condition III.E.2, in accordance with the schedule found in Condition III.I.2.
5. The Permittee must 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 the wells identified in Condition III.C.1, every five years (during the 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 must be made every five years (during the annual sampling event), or whenever the elevation changes.
6. Elevation of the bottom of each monitoring well identified in Condition III.C.1, referenced to MSL, is to be reported annually. This measurement must be taken during the annual sampling event in accordance with Condition III.F.3.
7. Information required by Conditions III.I.2, III.I.3, III.I.5 and III.I.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 Condition III.I.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 the 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. If the Permittee determines, pursuant to Condition III.E.3, that there is a statistically significant increase for any of the parameters specified in Condition III.D.1 at any monitoring well at the compliance point, the Permittee shall:
 - a. Notify the Illinois EPA in writing indicating what parameters and wells have shown statistical increases and provide all statistical calculations. This notification shall be submitted to the Illinois EPA within seven days

of the date that the increases are discovered.

- b. Within 90 days of the original sample date, the permittee may resample and test the determination made in Condition 10.a. If the evaluation of the resample result confirms the determination made in Condition 10.a, the permittee must conclude that a significant change in groundwater quality has occurred. If no sample is collected to test Condition 10.a determination, the observed value is confirmed and constitutes a significant change in groundwater quality.
 - c. Submit an assessment monitoring plan within 30 days of the significant change as determined in Condition 10.a or Condition 10.b in the form of a permit modification request. The assessment monitoring plan shall include appropriate methods for determining the source of the increase, the potential threat to human health and the environment and the concentration and extent of the contaminants.
 - d. Submit an assessment report based on and including the data and information generated from the completion of Condition 10.c to the Illinois EPA within 90 days of receipt of analytical results.
 - e. Propose a corrective action plan if assessment monitoring indicates that the facility has impacted groundwater. The corrective action plan shall be submitted within 30 days of approval of the assessment report required by Condition 10.d in the form of a permit modification request and include conclusions and proposed next steps.
11. If the Permittee determines, pursuant to Condition III.E.3 that there is a statistically significant increase above the background values for the parameters specified in Condition III.D.1, the Permittee may demonstrate that an alternate source caused the increase or that the increase resulted from error in sampling, analysis, or evaluation. The Permittee shall submit a permit modification request in accordance with Condition 10.c unless the demonstration successfully shows that a source other than the ponds caused the increase or that the increase resulted from errors in sampling, analysis or evaluation and the Illinois EPA concurs.

To make this demonstration, the Permittee shall:

- a. Notify the Illinois EPA in writing that they intend to make this demonstration. This notification must be submitted to the Illinois EPA within seven days of the date that the increase is discovered.

- b. Submit a report to the Illinois EPA which demonstrates that an alternate source caused the increase, or that the increase resulted from error in sampling, analysis, or evaluation. This report must be submitted within 90 days of the date that the increase is discovered.
- c. Submit to the Illinois EPA an application to make any appropriate changes to the detection monitoring program. This application must be submitted within 90 days of the date that the increase is discovered.
- d. Continue to monitor in accordance with the detection monitoring program at the facility.

J. REQUEST FOR PERMIT MODIFICATION

- 1. If the Permittee determines that the Groundwater Monitoring Program no longer satisfies the requirements of 35 IAC 724.201, the Permittee must, within 90 days, submit an application for a permit modification to the Illinois EPA to make any appropriate changes to the program which will satisfy the Bureau of Land, Permit Section.
- 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 - Corrective Action

A. INTRODUCTION

1. In accordance with Section 3004(u) and (v) of RCRA and 35 IAC 724.201, the Permittee must institute such corrective action as necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents from any solid waste management units (SWMUs) and any areas of concern (AOCs) at the facility. This section contains the conditions which must be followed to ensure these requirements are met.

Note: The term "corrective action" and "hazardous waste cleanup program" or "hazardous waste cleanups" are used interchangeably throughout the Permit, Illinois EPA letters, associated forms, reference, guidance, and any other materials associated with the requirements under this section.

2. The Permittee must conduct, as appropriate: (1) a RCRA Facility Investigation (RFI) to characterize each AOC or SWMU of concern at the facility; (2) determine whether releases of hazardous wastes and hazardous constituents have occurred from each AOC or SWMU of concern, and if so, the nature and extent of the release(s); and (3) gather other data, as necessary, to be used in determining the need, scope and design of a Corrective Measures Program (CMP).
3. Based upon the results of the RFI, the Permittee must develop and implement a CMP to protect human health and the environment from any of the SWMUs or AOCs at the facility.
4. The Permittee must provide hazardous waste cleanups, as appropriate, for: (1) any newly discovered SWMUs and AOCs; and/or (2) future releases for existing SWMUs at the facility.
5. The Permittee must carry out interim measures in accordance with the terms, conditions and requirements of this permit, as appropriate, to address existing contamination at the facility until such time as a final corrective measure can be developed and implemented.
6. The requirements of 35 IAC Parts 620 and 742 must be met, when applicable, in establishing remediation objectives for hazardous waste cleanups. In addition, all hazardous waste cleanup efforts must meet the requirements of 35 IAC 724.201.

7. The Permittee must incorporate, as necessary, climate change resilience and adaptation considerations into the hazardous waste cleanups required at this facility.
8. All Illinois EPA final decisions regarding RCRA corrective action at this facility are subject to the appeal provisions of the Act.
9. The original RCRA permit was issued by the Illinois EPA for this facility on April 21, 2000 (Log No. B-124), and the first renewal (Log No. B-124R) was issued on September 8, 2011. Section II of the last permit (B-124R) contained corrective action requirements for 35 SWMUs. The Permittee has conducted a substantial amount of investigation/remediation to date to meet these requirements and has completed corrective action efforts, with certain conditions, at 32 of these SWMUs.
10. The Permittee must still complete corrective action at three SWMUs within the facility. Condition IV.D describes the corrective action efforts which must still be completed in these areas.
11. Several former interim status hazardous waste management units at this facility have been remediated in accordance with RCRA closure plans approved by Illinois EPA. Furthermore, some non-hazardous waste management units at the facility were properly remediated before the issuance of the facility's RCRA permit in 2000.
12. Several non-hazardous waste surface impoundments were once present at the facility which were closed as landfills in the early 1990s. Waste from the remediation of several other units were placed in those impoundments before they were closed. The Permittee must provide post-closure for these units (referred to as the "Gypsum Ponds" and "Ball Powder Ponds") including implementation of a groundwater monitoring program set forth in Section III of this Permit.

B. CORRECTIVE ACTION REQUIREMENTS

1. The Permittee must conduct and complete corrective action, as necessary, to determine the nature and extent of releases of hazardous wastes and hazardous constituents from various SWMUs/AOCs, identified below at the facility:

SWMU Number	SWMU Name
5	Acid Ponds I & J
6	Primer Test Ponds K & L

11	Waste Pile
12	High Explosives Production Bldg. # 1
13	High Explosives Production Bldg. # 2
14	Slurry Production Bldg. # 3
15	Pack House # 4
16	Dynamite Production Bldg. # 5
17	Dynamite Production Bldg. #6
18	Dynamite Production Bldg. #7
19	High Explosives Production Bldg. # 8
20	Production Bldg. # 9
21	Wet Mix House / Dry Mix House # 10
22	High Explosives Production Bldg. # 11
23	Wet Mix House # 12
24	Blasting Agent Bldg. # 13
25	Blasting Agent Bldg. # 14
26	Blasting Agent Bldg. # 15
27	Dryer Building # 18
28	Dryer Building # 19
29	Dryer Building # 20
30	Dryer Building # 21
31	Dryer Building # 22
32	Slurry Building # 23
34*	Old Open Burn Area
38*	Two Small On-site Landfills (combined size 0.75 acres)
39*	Four Black Powder Buildings
40	Metal Bunkers 1-6
46	Production Ponds
47	Non-RCRA Open Burn Area
50	Southern Boneyard
62	Sumps Northeast of DXW1
63	Hole in Central Portion of Property
64	Filled Hole in Central Portion of the Property
65	Sump at South Primer Building

SWMUs in the above table denoted with an asterisk () require additional corrective actions which are further detailed in Condition IV.D.*

2. To allow for an efficient and flexible corrective action program, Dyno Nobel was divided into 35 SWMUs based on location, as shown in Attachment D to this Permit. These areas are to be investigated and remediated under the corrective action requirements of this Permit in a phased approach (implemented in series

or in parallel) until such time as the entire facility has been investigated and remediated.

3. Conduct additional investigation and remediation, as necessary, to address any on-site contamination and off-site contamination, which has migrated beyond the property boundaries from the current operation of the operation of the facility in addition to former releases.
4. The Permittee must gather other necessary data to determine the need, scope, and design of a Corrective Measure program and implement such Corrective Measures as necessary to complete Corrective Action (CA). Any Corrective Measure Plan must be submitted to the Illinois EPA for review and approval prior to implementation
5. Obtain "No Further Action" (NFA) determinations from the Illinois EPA for the SWMUs/AOCs/facility and any other impacted areas identified during the hazardous waste cleanup, where the contamination has migrated off-site from the former operation of the facility, when sufficient information has been provided by the Permittee that the media of interest has been adequately remediated for the SWMUs and other identified AOCs.
6. Dyno Nobel has conducted a substantial amount of investigation at the SWMUs of concern at this facility. Condition IV.C includes the facility's corrective action efforts that have been completed to date. Condition IV.D includes the required corrective actions that still must be completed at the facility and provides a summary of any institutional controls (i.e. Environmental Land Use Controls (ELUCs)) that have been established during corrective action process.

C. CORRECTIVE ACTION/REMEDIAL EFFORTS COMPLETED TO DATE

1. Dyno Nobel has also been required to complete corrective actions at each of the SWMUs identified in Condition IV.B.1 at the facility. The following is a summary of corrective action completed and NFA issued for each SWMU. Additional discussion regarding corrective action at each SWMU is provided in Conditions IV.C.1.a through IV.C.1.h below.

SWMU No.	SWMU Name	CA Status/NFA Date (Log No)
5	Acid Ponds I & J	7/1/2003 NFA (B-124-CA-3)
6	Primer Test Ponds K & L	7/1/2003 NFA (B-124-CA-3)
11	Waste Pile	7/1/2003 NFA (B-124-CA-3)
12	High Explosives Production Bldg. # 1	2/10/2011 NFA (B-124-CA-5)

13	High Explosives Production Bldg. # 2	2/10/2011 NFA (B-124-CA-5)
14	Slurry Production Bldg. # 3	2/10/2011 NFA (B-124-CA-5)
15	Pack House # 4	2/10/2011 NFA (B-124-CA-5)
16	Dynamite Production Bldg. # 5	2/10/2011 NFA (B-124-CA-5)
17	Dynamite Production Bldg. #6	1/26/2005 NFA (B-124-CA-4)
18	Dynamite Production Bldg. #7	2/10/2011 NFA (B-124-CA-5)
19	High Explosives Production Bldg. # 8	3/10/2017 NFA (B-124R-CA-2)
20	Production Bldg. # 9	3/10/2017 NFA (B-124R-CA-2)
21	Wet Mix House / Dry Mix House # 10	2/10/2011 NFA (B-124-CA-5)
22	High Explosives Production Bldg. # 11	7/1/2003 NFA (B-124-CA-3)
23	Wet Mix House # 12	3/10/2017 NFA (B-124R-CA-2)
24	Blasting Agent Bldg. # 13	9/13/2001 - NFA (B-124-CA-1)
25	Blasting Agent Bldg. # 14	9/13/2001 - NFA (B-124-CA-1)
26	Blasting Agent Bldg. # 15	9/13/2001 - NFA (B-124-CA-1)
27	Dryer Building # 18	2/10/2011 NFA (B-124-CA-5)
28	Dryer Building # 19	2/10/2011 NFA (B-124-CA-5)
29	Dryer Building # 20	2/10/2011 NFA (B-124-CA-5)
30	Dryer Building # 21	2/10/2011 NFA (B-124-CA-5)
31	Dryer Building # 22	2/10/2011 NFA (B-124-CA-5)
32	Slurry Building # 23	7/1/2003 NFA (B-124-CA-3)
40	Metal Bunkers 1-6	2/10/2011 NFA (B-124-CA-5)
46	Production Ponds	7/1/2003 NFA (B-124-CA-3)
47	Non-RCRA Open Burn Area	3/10/2017 NFA (B-124R-CA-2)
50	Southern Boneyard	7/1/2003 NFA (B-124-CA-3)
62	Sumps Northeast of DXW1	7/1/2003 NFA (B-124-CA-3)
63	Hole in Central Portion of Property	2/10/2011 NFA (B-124-CA-5)
64	Filled Hole in Central Portion of the Property	2/10/2011 NFA (B-124-CA-5)
65	Sump at South Primer Building	2/10/2011 NFA (B-124-CA-5)

- a. A modification request to the approved Phase I RFI Workplan was approved by the Illinois EPA in which no corrective actions were necessary for SWMUs 24, 25, and 26.
- b. As a result of the Illinois EPA review of the Phase I soil investigation results, concentrations of Constituents of Concern (COC) were found to be below detection limits for SWMUs 17 and no further investigation was required.
- c. The Phase I RFI groundwater investigation determined that groundwater in the vicinity of SWMU 38 has not been impacted at or above 35 IAC

742, Tier 1, Class I, groundwater ROs. No further action for groundwater is required in accordance with Condition 5 of the Illinois EPA letter (Log No. B-124-CA-3) dated July 1, 2003.

- d. As a result of the Illinois EPA review of the Phase II Facility Investigation Work Plan no further action was required at SWMUs 63 and 64.
- e. The Illinois EPA's review of the results of the approved Phase II investigation indicated that the parking lot covers the landfills (SWMU 38). On February 11, 2011, the Illinois EPA approved a report indicating that a new concrete engineered barrier had been constructed in the area where the parking lot was located and that this area is to continue being used as a parking lot.
- f. Prior to the implementation of the Phase II RFI the Illinois EPA determined that NFA was required for SWMUs 5, 11, 22, 32, 46, 50, and 62 based on a comparison of soil test results for Tier 1 and Tier 2 remediation objectives which was provided as additional information to the Phase II report.
- g. Based on the Illinois EPA review of the Phase II report which provided a comparison of soil test results for Tier 1 and Tier 2 remediation objectives no further action is required for SWMUs 12, 13, 14, 15, 16, 18, 21, 27, 28, 29, 30, 31, 40, and 65.
- h. Based on the Illinois EPA review of the soil removal efforts included in the October 20, 2015 submittal by Dyno Nobel, no further action was determined necessary at SWMUs 19, 20, and 23.
- i. Based on the Illinois EPA review of the October 20, 2015 submittal by Dyno Nobel, the 35 IAC Part 742 Tier 2 evaluation for lead found at SWMU 47 was approved and NFA of groundwater was required.
- j. In a letter sent to Dyno Nobel by the Illinois EPA (Log No. B-124R-CA-2) on March 10, 2017, a requirement to submit an ELUC for SWMUs 38 and 47 was included. Dyno Nobel subsequently submitted a draft ELUC for SWMUs 38 and 47 on December 11, 2017 and revised and resubmitted the draft ELUC on April 9, 2018.

2. OTHER REMEDIAL ACTIVITIES COMPLETED AT THE FACILITY

Several former interim status hazardous waste management units at the facility have been remediated in accordance with closure plans approved by the Illinois EPA. In addition, some non-hazardous waste management units at this facility were remediated prior to the issuance of the original RCRA permit for this facility. A summary of these efforts is as follows:

- a. On October 7, 1992, the Illinois EPA determined that the following non-hazardous waste management units at the facility had been properly closed:
 - i. Acid Tank Area in Nitration Complex;
 - ii. Drum Storage Area for Slurry Sludge and Washdown Sludge;
 - iii. Farm Ponds (M, N);
 - iv. Quonset hut for storage of non-hazardous waste drums;
 - v. 91 acres of farmland that received ammonia wastewater from the farm ponds;
 - vi. Waste piles; and
 - vii. Three buildings burned in accordance with a closure plan approved by the Illinois EPA on March 5, 1985.
- b. On May 28, 1993, the Illinois EPA approved a plan to close the following former interim status hazardous waste management units at this facility:
 - i. Inadvertent Container Storage Area Located in Trailer Magazine #6;
 - ii. Remote Staging and Sampling Area;
 - iii. Inadvertent Container Storage Area Located in the Materials Warehouse (Building E-05); and
 - iv. A waste pile unit referred to as the "Boneyard Area."

These units were closed in accordance with the approved plan and the

Illinois EPA accepted certification of closure of the units on February 10, 1995.

- c. On August 14, 1995, the Illinois EPA approved a RCRA interim status closure plan for a former hazardous waste management unit referred to as the "Old Open Burn Area." Remediation of this unit was initially carried out under RCRA interim status; however, a decision was eventually made to complete remediation of this unit as part of the RCRA corrective action program being carried out at the facility. This unit is also referred to as SWMU 34 in the corrective action program.
- d. An interim status open burn area was once present at the location where the new Open Burn Areas were to be constructed in accordance with the RCRA permit issued by the Illinois EPA on April 21, 2000. Before the new units could be constructed, the Permittee conducted an investigation of the soil and groundwater in this area as required by the RCRA permit.
- e. On May 24, 2001, the Illinois EPA determined that the groundwater at this location had not been adversely impacted by the operations of the interim status open burn unit. On May 30, 2001, the Illinois EPA approved a report indicating that the soils remaining at this location met the requirements of 35 IAC Part 742. As a result of these determinations, the Permittee was able to begin construction of the new open burn areas. As noted in Condition I.C, these units ceased operation in 2021 and are currently undergoing closure in accordance with the approved Closure Plan.

D. CORRECTIVE ACTION EFFORTS STILL TO BE COMPLETED

1. Based upon the Illinois EPA's review of the RFI Phase II report approved on February 10, 2011, included in Log No. B-124-CA-8, additional corrective action efforts are necessary at the following SWMUs:

SWMU No.	SWMU Name
34	Old Open Burn Area
38	Two Small On-Site Landfills (which cover a total of 0.75 acres)
39	Four Black Powder Buildings

2. The Permittee must complete corrective action for the three active units identified in Condition IV.D.1. As of the issuance date of this Permit, the following submittals are under the Illinois EPA review:

- a. Work Plan for SWMUs 34 and 39;
- b. Draft Environmental Land Use Control (ELUC) for SWMU 38.

Conditions IV.D.3 through IV.D.5 describe the additional corrective action efforts which must be carried out at these SWMUs.

3. Regarding SWMU 34 – Old Open Burn Area:

- a. A review of historical soil investigation data determined that the extent of impact at this SWMU has been defined with the exception of the southern portion where DNT isomers and lead are present. To better delineate the horizontal extent of contamination in the southern portions of this area, a minimum of six additional soil borings must be made in this area and samples collected for analysis 0-1 feet below ground surface (bgs), 3-4 feet bgs and 5-6 feet bgs; all samples must be analyzed for lead and DNT isomers. A report documenting the results of this investigation must be submitted to the Illinois EPA for review and approval; this report must also present and evaluate all data collected to date at this unit and contain a proposal for the next steps which must be carried out in the corrective action program for this unit.
- b. A minimum of three groundwater monitoring wells must be installed south and hydraulically downgradient of this unit, as proposed in Section 9.2 of the Phase II Report; a plan for installation and monitoring the water quality at these wells must be submitted to the Illinois EPA for review and approval. The groundwater monitoring wells must be installed according to Illinois EPA Groundwater Monitoring Well Diagram found at the Illinois EPA website and constructed in accordance with 77 IAC Part 920. Construction details for each installed groundwater monitoring well must be submitted within 30 days of installation on a Monitoring Well Completion Form. One Field Boring Log Form must accompany each well completion form. Maps of the SWMU 34 area with groundwater elevations must accompany the well construction details.

4. Regarding SWMU 38 – Two Small On-Site Landfills:

An ELUC meeting the requirements of 35 IAC Part 742 must be established which will ensure this barrier is properly maintained in the future and will restrict exposure to the soils and waste which underlie the barrier in accordance with Conditions IV.D.9 through IV.D.12 and Illinois EPA's letters.

5. Regarding SWMU 39 – Four Black Powder Buildings:
 - a. Additional RFI efforts must be conducted at each of the four buildings which comprise this unit as required corrective action letters associated with this unit to complete corrective action effort.
 - i. The most recent Illinois EPA approval letter at the time of the issuance of this permit is letter associated with SWMU 39 was dated July 10, 2025 (Log No. B-124R-M-4).
 - ii. RFI report documenting the results of the additional investigation must be submitted to the Illinois EPA for review and approval in accordance of the Illinois EPA letter; this report must also present and evaluate all data collected to date at this unit and contain a proposal for the next steps which must be carried out in the corrective action program for this unit.
 - b. Any additional investigation and/or corrective measures, as necessary, must be conducted in accordance with Illinois Lettes associated with this SWMU to obtain a NFA.
6. In the event that it is determined during a soil investigation that contaminants of concern have reached or extended above a saturated zone, the facility will be required to submit a work plan to address the possible migration of contaminants to groundwater in the vicinity of the SWMUs in question. In addition, it may be necessary for the facility to install additional groundwater monitoring wells and implement a groundwater monitoring program in accordance with 35 IAC 724, Subpart F, to assess the quality of groundwater monitoring beneath the affected area and to determine the extent of any contamination above the applicable 35 IAC Part 742, Tier I, Class I Groundwater Remediation Objectives.
7. If a groundwater investigation is required by Condition IV.D.6, the groundwater sampling/investigation workplan must be in accordance with the approved groundwater sampling/investigation plan and in accordance with "Test methods for Evaluating Solid Wastes, Physical/Chemical Methods, Third Edition (SW-846) and finalized updates". This document must be submitted to Illinois EPA within 45 days of the date of such findings.
8. For exceedances of the Tier I soil component of groundwater ingestion exposure route and ingestion exposure routes under 35 IAC Part 742, each area of contamination must be analyzed/evaluated individually. In addition, the

horizontal and vertical extent of contamination must be identified prior to further evaluation.

9. Remediation objectives for this project have been based on one of the following: (1) industrial/commercial property use; (2) engineered barriers; (3) point of human exposure at a location other than the source; and/or (4) exclusion of exposure routes. In accordance with 35 IAC 742.1000, an institutional control meeting the requirements of 35 IAC 742, Subpart J must be established to ensure that these facts do not change in the future, as they were fundamental to the establishment of the approved remediation objectives. The only institutional control which can be used for this project is an ELUC.
 - a. A proposed ELUC meeting the requirements of 35 IAC 742, Subpart J must be submitted to the Illinois EPA within 90 days of the effective date of this Permit. This ELUC must:
 - i. Prohibit the use of on-site groundwater for potable purposes;
 - ii. Restrict future use of the site to commercial/industrial activities;
 - iii. Indicate that waste remains in place at the Gypsum Ponds/Ball Powder Ponds and SWMU 38;
 - iv. Require that an engineered barrier over SWMU 38 remain in place and be properly maintained in the future; this engineered barrier is currently comprised of 100 feet by 150 feet concrete parking lot and the warehouse adjacent to it;
 - v. Require that the final cover over the Gypsum Ponds/Ball Powder Ponds remain in place and be properly maintained in the future; and
 - vi. Restrict exposure to the waste present beneath the engineered barrier at SWMU 38 and the final cover at the Gypsum Ponds/Ball Powder Ponds.
10. The portion of the ELUC for the Gypsum Ponds/Ball Powder Ponds and SWMU 38 must be developed in accordance with 35 IAC 742, Subpart J and must also clearly include the following information and restrictions:
 - a. A statement that waste remains at the Gypsum Ponds/Ball Powder Ponds and SWMU 38 which must be covered;

- b. A scaled drawing, relative to the property boundaries at the site, showing the boundaries of the: (1) final cover over the Gypsum Ponds/Ball Powder Ponds; and (2) engineered barrier placed over SWMU 38;
 - c. A description of the construction details of the covers mentioned in Condition IV.D.9.a;
 - d. A requirement that the covers mentioned in Condition IV.D.9.a be properly maintained in the future;
 - e. A requirement that a site safety plan meeting the requirements of 29 CFR 1910.120 be developed and implemented any time construction/excavation work takes place in the materials beneath the covers mentioned in Condition IV.D.9.a. Among other things, this plan must properly restrict worker exposure and any other person's exposure to the material; and
 - f. A requirement that any material removed from beneath these covers is managed in accordance with 35 IAC, Subtitle G: Waste Disposal.
11. 35 IAC 742.1010(d)(8) requires that an ELUC contain scaled maps which show information about the facility, any remaining contamination at the facility and any physical features at the facility to which the ELUC applies.
- a. The required scaled site maps must specifically show:
 - i. The legal boundary of the property to which the ELUC applies;
 - ii. The horizontal and vertical extent of contaminants of concern are above applicable remediation objectives for soil and groundwater to which the ELUC applies;
 - iii. Any physical features to which an ELUC applies (e.g., engineered barriers, monitoring wells, caps); and
 - iv. The nature, location of the source, and direction of movement of the contaminants of concern.
 - b. Exhibit B of the model ELUC developed by the Illinois EPA is comprised of the maps necessary to meet the requirements of 35 IAC 742.1010(d)(8).

In developing such an exhibit for an ELUC associated with an engineered barrier or industrial/commercial land use restrictions:

- i. If only one drawing is used to present all the required information, then it must be clearly labeled as Exhibit B to the ELUC in question. Many times, however, it will be necessary to include more than one drawing in Exhibit B to meet the requirements of 35 IAC 742.1010(d)(8). In such cases, each map must be given a unique Exhibit number (i.e., Exhibit B-1, B-2, B-3, etc.) and labeled as such.
- ii. A cover sheet must be provided for the exhibit which: (a) lists the types of scaled maps that must be provided in the ELUC as required in 35 IAC 742.1010(d)(8); (b) identifies the map within the exhibit which addresses the individual requirements of 35 IAC 742.1010(d)(8)(A), (B), (C) and (D); and (c) lists the maps which comprise the exhibit by name and number.
- iii. The Real Estate Tax Index/Parcel Index Number (PIN) of the property in question must be contained on each map in Exhibit B.

12. The following table summarizes the next steps which must be taken in completing corrective action at this facility. Specific requirements for next step of corrective action for SWMUs listed below are included as special conditions in Section V of this Permit.

SWMU No.	Next Step in Corrective Action Program	Next Document Submitted to the Illinois EPA
34	Additional soil investigation	Soil investigation report and comprehensive evaluation of soils. Develop and implement approved CM as necessary.
	Development of groundwater monitoring plan	Groundwater monitoring plan
38	Develop draft ELUC which places certain restrictions on facility; this ELUC must also address the Gypsum Ponds/ Ball Powder Ponds and some site-wide restrictions.	Draft ELUC. Implementation of approved ELUC prior to NFA.
39	Additional soil investigation	Soil investigation report and comprehensive evaluation of soils. Develop and implement approved CM as necessary.

13. Corrective Action Requirements for the Gypsum Ponds (SWMU 2)

- a. Waste and contaminated soil were consolidated and placed in eight adjacent surface impoundments which covered approximately nine acres. These impoundments, referred to as the Gypsum Ponds, and Ball Powder Ponds were then closed in accordance with a plan approved by the Illinois EPA.
- b. The Illinois EPA approved certification of closure of these units on October 7, 1992. As such, the 30-year post-closure care period began for these units on that date.
- c. The Permittee must comply with the requirements of Section III of this Permit relative to groundwater in the vicinity of the Gypsum Ponds (SWMU 2).
- d. Inspections of the closed landfill must be conducted quarterly. Records of field investigations, inspections, sampling and corrective actions that have been taken are to be maintained at the site and made available to Illinois EPA personnel or their designees through an intergovernmental agreement. During the post-closure care period, these records are to be maintained at the office of the site operator.
- e. During the post-closure care period, corrective action must be taken if problems, including but not limited to the following are observed:
 - i. Ponding;
 - ii. Cracks in final cover greater than one inch wide;
 - iii. Erosion problems;
 - iv. Gas problems;
 - v. Odor problems;
 - vi. Dead or stressed vegetation;
 - vii. Vegetation with taproots growing in areas not so designed;
 - viii. Vector problems; and

- ix. Leachate popouts or seeps.
- f. During the post-closure care period, all areas with failed or eroded vegetation in excess of 100 square feet must be revegetated.
- g. The vegetative cover of the landfill must be mowed at least one time each calendar year.
- h. The Permittee must not perform (or allow to be performed) within the boundary of the SWMUs that are closed as landfills, any activities which would disturb the soil and fill at a depth greater than 12 inches below the surface of the landfill, until:
 - i. Sufficient sampling has been done to determine whether the soils and fill material to be affected by the activities:
 - 1) Contain any of the hazardous constituents identified in 35 IAC 721, Appendix G for wastes with hazardous waste numbers F001, F002 and K061 (including degradation products); or
 - 2) Exhibit any hazardous characteristics identified in 35 IAC 721, Subpart C; and
 - ii. A determination is made about whether these activities would have the potential of causing additional releases of hazardous constituents so as to affect human health or the environment.
- i. The Permittee must, at a minimum, post signs along the perimeter of the SWMUs that are closed as landfills warning that any activities which could disturb the soil in the landfill are prohibited without prior approval. If at any time, access to the facility by nonauthorized persons cannot be assured, then the Permittee must also construct and maintain a fence around the SWMUs that are closed as landfills of adequate design to prevent access by nonauthorized persons.
- j. The Permittee must manage all solid and hazardous wastes generated as a result of activities involving the soil and fill in the SWMUs that are closed as landfills in conformance with all applicable State and Federal requirements.

- k. No later than 60 days prior to the anticipated starting date of any activities involving the soils and fill at the SWMUs that are closed as landfill, the Permittee must submit to the Illinois EPA a report detailing (at a minimum): the proposed activity, the details of the sampling effort, the results of the sampling analysis, an assessment of the impact of the proposed activity on the potential for releasing hazardous constituents to the environment in such amounts as to impact human health and the environment, and the facility's plan to manage any solid and hazardous wastes generated in conformance with all applicable State and Federal requirements. The Illinois EPA must review the report, and may as a result of the review, either approve the proposed activity, or require additions and/or modification of the sampling activity to incorporate measures necessary to ensure protection of human health and the environment.

E. REQUIREMENTS FOR ADDRESSING NEWLY IDENTIFIED SWMUs and AOCs

1. The Permittee must notify the Illinois EPA in writing of any newly identified SWMU or AOC discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than 30 calendar days after discovery. The notification must provide the following information, as available:
 - a. The location of the newly identified SWMU in relation to other SWMUs on a scaled map or drawing;
 - b. The type and past and present function of the unit;
 - c. The general dimensions, capacities, and structural description of the unit (available drawings and specifications provided);
 - d. The period during which the unit was operated;
 - e. The specifics on all materials, including but not limited to, wastes and hazardous constituents, that have been or are being managed at the SWMU or AOC, to the extent available;
 - f. The results of any relevant available sampling and analysis which may aid in determining whether releases of hazardous wastes or hazardous constituents have occurred or are occurring from the unit.
2. If the submitted information demonstrates a potential for a release of hazardous

waste or hazardous constituents from the newly identified SWMU/AOC, the Illinois EPA may request, in writing, that the Permittee prepare a SWMU Assessment Plan (Plan) and a proposed schedule of implementation and completion of the Plan for any additional SWMU(s)/AOC(s). The Plan must propose investigations, including field investigations, if necessary, to determine the release potential to specific environmental media for the newly identified SWMU/AOC. The Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify migration of hazardous waste and hazardous constituents from the newly identified SWMU(s)/AOC(s) to the environment.

3. Within 90 days after receipt of the Illinois EPA's request for a Plan, the Permittee must submit a Plan to the Illinois EPA for review and approval.
4. After the Permittee submits the Plan, the Illinois EPA must either approve, conditionally approve, or disapprove the Plan in writing. If the Plan is approved, the Permittee must begin to implement the Plan within 45 days of receiving such written notification or according to the terms and schedule established within the Plan and any conditions placed on it. If the Plan is disapproved, the Illinois EPA must notify the Permittee in writing of the Plan's deficiencies and specify a due date for submittal of a revised Plan.
5. The Permittee must submit a report documenting the results of the approved Plan to Illinois EPA Bureau of Land in accordance with the schedule in the approved Plan. The SWMU Assessment Report must describe all results obtained from the implementation of the approved Plan.
6. Additional investigation plans and reports must be submitted to and approved by the Illinois EPA, as necessary, to ensure the nature and extent of contamination at the SWMU/AOC is adequately characterized. Once the contamination is characterized, the Permittee must develop remedial objectives for the SMWU/AOC in accordance with 35 IAC Parts 742 and 620; such objectives are subject to the Illinois EPA review and approval.
7. The Permittee must implement a CMP, as necessary, to properly address any contamination encountered during the assessment. Guidance regarding the implementation of this program will be provided at the time the Illinois EPA notifies the Permittee of the need for such a program.
8. All efforts carried out at newly identified SWMUs/AOCs must meet the requirements of 35 IAC 724.201.

F. FUTURE RELEASES FROM SWMUs

There exists a potential that a release may occur in the future from SWMUs identified in the RCRA Facility Assessment (RFA) or RFI which did not require any corrective action at the time that the RFA or RFI was completed. If the Permittee discovers that a release has occurred from such a SWMU in the future, then the Illinois EPA must be notified of this release within 30 days after its discovery following the procedures set forth in Condition IV.E.1. Upon the Illinois EPA's written request, the Permittee must determine the nature and extent of the contamination by following the procedures set forth in Condition IV.E. The results of all corrective action efforts required by this condition must meet the requirements of 35 IAC 724.201.

G. INTERIM MEASURES/STABILIZATION

The Permittee must carry out interim measures/stabilization activities to prevent or mitigate the migration of a release of hazardous substances into the environment, and to provide adequate protection to human health and the environment.

1. At any time during the corrective action process, the Permittee may initiate interim measures for the purpose of preventing continuing releases and/or mitigating the results of releases and/or mitigating the migration of hazardous wastes or hazardous constituents. It must not be necessary to conduct all phases of a RFI or a corrective measures study (CMS) prior to implementing an interim measure if the Illinois EPA and the Permittee agree that a problem can be corrected, or a release cleaned up, without additional study and/or without a formal CMS.
2. Prior to implementing any interim measures, the Permittee must submit detailed information regarding the proposed interim measure to the Illinois EPA for approval. This information must include, at a minimum:
 - a. Objectives of the interim measures: how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long-term solution at the facility;
 - b. Design, construction, and maintenance requirements;
 - c. Schedules for design and construction; and
 - d. Schedules for progress reports.

3. If the Illinois EPA determines that a release cannot be addressed without additional study and/or a formal CMS, then the Illinois EPA will notify the Permittee that these must be performed. Any proposal made under this provision or any other activity resulting from such proposal, including the invocation of dispute resolution, must not affect the schedule for implementation of the other corrective action efforts being carried out at the facility or of any other portion of the Permit.
4. If the Illinois EPA determines that interim measures are necessary to protect human health or the environment, the Permittee will be notified by way of a permit modification.
5. Consistent with the annual reporting requirements of this Permit, the Permittee must submit a report assessing the effectiveness of any interim measures being carried out in accordance with this Permit. Based on a review of this report, the Illinois EPA reserves the right to require additional interim measures be carried out if it is determined that the interim measure is unable to protect human health and the environment. This annual report should at a minimum contain the following information regarding each system which comprises the interim measure:
 - a. A discussion of each system's operation during the year. This discussion should address: (1) actual daily, weekly and monthly flow rates through each system; (2) any periods when the systems were not operating; and (3) deviations from the design operating procedures for the system (such as problems with drawing an adequate vacuum, downtime due to equipment failure, etc.);
 - b. Results of all monitoring efforts carried out during the year;
 - c. A discussion of the effectiveness of the system supported as appropriate with data and calculations; and
 - d. Recommended changes, if any, which should be made to the system to improve its effectiveness.
6. The Illinois EPA reserves the right to require the Permittee to remove or treat soil if the Illinois EPA determines that contaminants are present in the soils at levels such that the remediation system is unable to protect human health and the environment. Remediation objectives for corrective measures will be established by the Illinois EPA at a later date.

7. The interim measure approved for a SWMU may not be sufficient to meet the final requirements for corrective action for remediation for the unit. The adequacy of the interim measure will be addressed upon the Illinois EPA review and approval of the RFI reports and the CMP, as required by this Permit. As such, the Permittee may be required to expand this interim measure as necessary to address existing or additional contamination detected through RFI investigations.
8. The Illinois EPA reserves the right to require revision and modification of the interim measures implemented by the facility should it be determined by the Illinois EPA through information obtained through facility monitoring that the interim measures approved by this portion of the Permit are ineffective in protecting human health and the environment.

H. FINANCIAL ASSURANCE FOR HAZARDOUS WASTE CLEANUP

1. The current cost-estimate for completing corrective action at the facility is \$680,000.00 in 2020 dollars. The Permittee must prepare an updated cost estimate in 2026 dollars for the completion of any corrective action required under this Permit in order to provide financial assurance for corrective action in accordance with Conditions IV.H.2 through 6. The cost-estimate for completing corrective action required in this Permit must include 10% contingency.
2. Such a cost estimate required in Condition IV.H.1 must be based upon the cost of contamination investigations and assessments for the SWMU(s), and design, construction, operation, inspection, monitoring, and maintenance of the corrective measure(s) to meet the requirements of 35 IAC 724.201 and this Permit. These estimates must be based upon third party costs.
3. The Permittee must demonstrate continuous compliance with 35 IAC 724.201 by providing documentation of financial assurance using a mechanism specified in 35 IAC 724.243, in at least the amount of the cost estimate required under Condition IV.H.1. The words "completion of corrective action" must be substituted for "closure and/or post-closure", as appropriate in the financial instrument specified in 35 IAC 724.251. The documentation must be submitted to the Illinois EPA within 60 days after the approval of the initial or revised cost estimates required under Condition IV.H.1. The Illinois EPA may accept financial assurance for completion of corrective action in combination with another financial mechanism that is acceptable under 35 IAC 724.246 at its discretion.
4. It must be noted that cost estimates and financial assurance must be provided for the operation of the groundwater remediation system required by Section III

of this Permit as such a system is necessary to meet the requirements of 35 IAC 724.201.

5. All cost estimates prepared under the requirements of Conditions IV.H.1 through IV.H.4 must be submitted as a Class 1* permit modification request in accordance with 35 IAC 703.281.
6. Financial assurance for corrective action must be updated, as necessary, to reflect the current status of the hazardous waste cleanup program at this facility. In addition, this financial assurance must be adjusted annually for inflation.

Section V - Special Conditions

A. GENERAL REQUIREMENTS

1. The Permittee is prohibited from conducting any waste management activities outside the permitted boundaries of this facility without a permit modification and proof of compliance with Section 3.32, 39.2, and 39(c) of the Act. Waste management includes storage, staging, treatment, sampling or all other activities not associated with transportation of waste.
2. The facility is not authorized to accept waste from offsite.

B. CONTINGENCY PLAN

1. The Permittee must implement the Contingency Plan whenever there is a fire, explosion, or spill which involves hazardous waste.
2. The Permittee must contact the local emergency response entities as soon as possible after implementation of the Contingency Plan for a fire or explosion:
 - a. The entities which must be notified include:
 - i. Local Fire Department (e.g., Wolf Lake, Jonesboro, Anna)
 - ii. Illinois State Police Department
 - iii. Local Emergency Services Disaster Agency (ESDA) Coordinator
 - iv. Local Emergency Planning Committee (LEPC)
 - v. Local Hospitals (as appropriate e.g., St. Francis Medical Center, Union County Hospital and Internal Medicine Group)
 - vi. Union County Sheriff
 - b. The information which must be initially relayed to each entity includes:
 - i. The type of emergency (fire or explosion);
 - ii. The type of wastes involved in the emergency and the approximate quantity involved; and

- iii. An initial assessment of the conditions at the site and whether outside help is needed to properly respond to the situation.
 - c. If the Permittee is able to properly respond to the emergency without any aid from the entities identified in Condition V.B.1, the Permittee must notify each of these entities when the emergency situation no longer exists.
3. The Permittee must review all components of the Contingency Plan with the local emergency response entities within 12 months of the effective date of the Permit and each year afterwards. Copies of the meeting notes and list of attendees must be included in the facility's operating record and be available to the Illinois EPA for review upon oral or written request.
4. Any incident which requires implementation of the Contingency Plan must be recorded in the facility's operating record in an incident log which is maintained separate from the facility's other operating records. In addition to the information identified in the approved permit application, the incident log must include, at a minimum, the waste management units involved in the incident, the cause of the release, measures taken to correct the situation and prevent a reoccurrence.

C. CLOSURE

Any changes to the approved closure plan must be submitted in the form of a permit modification in accordance with the procedures in 35 IAC 703.280.

D. REPORTING REQUIREMENTS

1. The Permittee must notify the Illinois EPA's Marion Regional Office orally within 24 hours whenever the Contingency Plan is implemented.
2. The Permittee must notify the Illinois EPA's Bureau of Land Permit Section, Materials Management Section, Compliance Section, and Illinois EPA's Marion Regional Office that cleanup operations have been completed, and that the emergency equipment has been cleaned and is fit for its intended use before operations are resumed in the affected area whenever the Contingency Plan is implemented.

E. SPECIAL CONDITIONS FOR CORRECTIVE ACTION

1. As the next step in completing corrective action at the facility, within 90 days of the effective date of this Permit, the Permittee must submit the following to the Illinois EPA for review and approval:
 - a. The soil investigation reports and comprehensive evaluation of soils for SWMUs 34 and 39;
 - b. The proposed groundwater monitoring program for SWMU 34;
 - c. The proposed draft ELUC required by Condition IV.D.9; and
 - d. An updated detailed cost estimate for corrective action required by this Permit.

Section VI - Standard Conditions

GENERAL REQUIREMENTS

1. **EFFECT OF PERMIT.** The existence of a RCRA permit must not constitute a defense to a violation of the Environmental Protection Act (Act) or Subtitle G, except for prohibitions against development, modification or operation without a Permit. Issuance of this Permit does not convey property rights or any exclusive privilege. Issuance of this Permit does not authorize any injury to persons or property or invasion of other private rights, or infringement of State or local law or regulations. (35 IAC 702.181)
2. **PERMIT ACTIONS.** This Permit may be modified, reissued, or revoked for cause as specified in 35 IAC 703.270 through 703.273 and Section 702.186. The filing of a request by the Permittee for a permit modification or reissuance, 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)
3. **SEVERABILITY.** The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Permit must not be affected thereby. (35 IAC 705.202)
4. **PERMIT CONDITION CONFLICT.** In case of conflict between a special permit condition and a standard condition, the special condition will prevail. (35 IAC 702.160)
5. **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 Act and is grounds for enforcement action; permit revocation or modification; or for denial of a permit renewal application. (35 IAC 702.141 and 35 IAC 703.242)
6. **DUTY TO REAPPLY.** 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 the Illinois EPA. (35 IAC 702.142 and 35 IAC 703.125)
7. **PERMIT EXPIRATION.** This Permit and all conditions herein will remain in effect beyond the Permit's expiration date if the Permittee has submitted a timely, complete application (see 35 IAC 703.181-703.209) and through no fault of the Permittee, the Illinois EPA has not issued a new Permit as set forth in 35 IAC 702.125.

8. **NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE.** It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit. (35 IAC 702.143)
9. **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 are reasonable to prevent significant adverse impacts on human health or the environment. (35 IAC 702.144)
10. **PROPER OPERATION AND MAINTENANCE.** The Permittee must at all times 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)
11. **DUTY TO PROVIDE INFORMATION.** The Permittee must furnish to the Illinois EPA, within a reasonable time, any relevant information which the 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)
12. **INSPECTION AND ENTRY.** The Permittee must allow an authorized representative of the 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 and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and

- 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 702.149)

13. MONITORING AND RECORDS. (35 IAC 702.150)

- 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 35 IAC 721, Appendix A. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Third Edition (SW-846), and finalized updates; 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 request of the 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 shall 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)

14. REPORTING PLANNED CHANGES. The Permittee must give written notice to the 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 the Illinois EPA as permit modification request that complies with the requirements of 35 IAC 703.280. (35 IAC 702.152(a))

15. **CONSTRUCTION CERTIFICATION.** For a new hazardous waste management facility (HWM), the Permittee must 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 the Illinois EPA by certified mail or hand delivery a letter signed by the Permittee and a qualified Illinois licensed professional engineer stating that the facility has been constructed or modified in compliance with the Permit; and
 - b. The Illinois EPA has inspected the modified or newly constructed facility and finds it is in compliance with the condition of the Permit; orIf, within 15 days of the date of submission of the letter in paragraph (a), the Permittee has not received notice from the 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)
16. **ANTICIPATED NONCOMPLIANCE.** The Permittee must give advanced notice to the 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))
17. **TRANSFER OF PERMITS.** This Permit may not be transferred by the Permittee to a new owner or operator unless the Permit has been modified or reissued pursuant to 35 IAC 703.260(b) or 35 IAC 703.272. Changes in the ownership or operational control of a facility must be made as a Class 1 modification with the prior written approval of the Illinois EPA. The new owner or operator must submit a revised permit application no later than 90 days prior to the scheduled change. (35 IAC 703.260)
18. **MONITORING REPORTS.** Monitoring results must be reported at the intervals specified in the Permit. (35 IAC 702.152(d))
19. **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))

20. TWENTY-FOUR HOUR REPORTING (35 IAC 702.152(f) and 35 IAC 703.245).

- a. The Permittee must report to the Illinois EPA and the U.S. EPA's National Release Center of 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. This report must include the following:
 - 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 HWM facility, which could threaten the environment or human health outside the facility.
- b. The description of the occurrence and its cause must include:
 - i. Name, address, and telephone number of the owner or operator;
 - ii. Name, address, and telephone number of the facility;
 - iii. Date, time, and type of incident;
 - iv. 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. 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. The Illinois EPA may waive the five day written notice requirement in favor of a written report within 15 days.

21. **OTHER NONCOMPLIANCE.** The Permittee must report all instances of noncompliance not otherwise required to be reported under Standard Conditions 18, 19 and 20, at the time monitoring reports, as required by this Permit, are submitted. The reports must contain the information listed in Standard Condition 20. (35 IAC 702.152(g))
22. **OTHER INFORMATION.** Where the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Illinois EPA, the Permittee must promptly submit such facts or information. (35 IAC 702.152(h))
23. **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 the 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 the 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)
24. **SUBMITTAL OF REPORTS OR OTHER INFORMATION.** All written reports or other written information required to be submitted by the terms of this Permit must be sent to:

Illinois Environmental Protection Agency
Bureau of Land #33
Permit Section
2520 West Iles Avenue
P.O. Box 19276
Springfield, Illinois 62794-9276
25. **SIGNATORY REQUIREMENT.** All permit applications, reports or information submitted to the Illinois EPA must be signed and certified as required by 35 IAC 702.126. (35 IAC 702.151)

26. **CONFIDENTIAL INFORMATION.** Any claim of confidentiality must be asserted in accordance with 35 IAC 702.103 and 35 IAC Part 161.
27. **DOCUMENTS TO BE MAINTAINED AT FACILITY SITE.** The Permittee must maintain at the facility, until closure is complete, the following documents and amendments, revisions, and modifications to these documents:
- a. Waste analysis plan as required by 35 IAC 724.113(b) and this Permit.
 - b. Personnel training documents and records as required by 35 IAC 724.116(d) and this Permit.
 - c. Contingency plan as required by 35 IAC 724.153(a) and this Permit.
 - d. Closure plan as required by 35 IAC 724.212(a) and this Permit.
 - e. Cost estimate for facility closure as required by 35 IAC 724.242(d) and this Permit.
 - f. Operating record as required by 35 IAC 724.173 and this Permit.
 - g. Inspection schedules as required by 35 IAC 724.115(b) and this Permit.
28. **WASTE MINIMIZATION.** The Permittee must certify at least annually that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable, and the proposed method of treatment, storage, or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment, in accordance with 35 IAC 724.173(b)(9).

GENERAL FACILITY STANDARDS

29. **NOTICE OF WASTE FROM A FOREIGN SOURCE.** The Permittee who has arranged to receive hazardous waste from a foreign source must notify the Illinois EPA in writing at least four weeks in advance of the date the waste is expected at the facility. (35 IAC 724.112(a))
30. **NOTICE OF WASTE FROM OFF-SITE.** The Permittee who receives hazardous waste from an off-site source (except where the Permittee is also the generator), must inform the generator in writing that the Permittee has the appropriate Permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the facility operating record. (35 IAC 724.112(b))

31. GENERAL WASTE ANALYSIS. The Permittee must comply with the procedures described in the approved waste analysis plan. (35 IAC 724.113)
32. SECURITY. The Permittee must comply with the security provisions of 35 IAC 724.114(b) and 35 IAC 724.114(c).
33. GENERAL INSPECTION REQUIREMENTS. The Permittee must follow the approved inspection schedule. The Permittee must remedy any deterioration or malfunction discovered by an inspection as required by 35 IAC 724.115(c). Records of inspections must be kept as required by 35 IAC 724.115(d).
34. PERSONNEL TRAINING. The Permittee must conduct personnel training as required by 35 IAC 724.116 and must maintain training documents and records as required by 35 IAC 724.116(d) and 35 IAC 724.116(e).
35. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE. The Permittee must comply with the requirements of 35 IAC 724.117.
36. 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).

PREPAREDNESS AND PREVENTION

37. DESIGN AND OPERATION OF FACILITY. The Permittee must maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. (35 IAC 724.131)
38. REQUIRED EQUIPMENT. The Permittee must equip the facility with the equipment set forth in the approved contingency plan, as required by 35 IAC 724.132.
39. TESTING AND MAINTENANCE OF EQUIPMENT. The Permittee must test and maintain the equipment specified in the contingency plan and this Permit as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities are set forth in the approved inspection schedule. (35 IAC 724.133)
40. ACCESS TO COMMUNICATIONS OR ALARM SYSTEM. The Permittee must maintain access to the communications or alarm system as required by 35 IAC 724.134.

41. **REQUIRED AISLE SPACE.** The Permittee must maintain aisle space as required by 35 IAC 724.135 and National Fire Protection Association (NFPA) requirements.
42. **ARRANGEMENTS WITH STATE AND LOCAL AUTHORITIES AND EMERGENCY RESPONSE CONTRACTORS.** The Permittee must attempt to make emergency response arrangements with State and local authorities and agreements with State emergency response teams and emergency response contractors and equipment suppliers as required by 35 IAC 724.137. If State or local officials refuse to enter in preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

CONTINGENCY PLAN

43. **IMPLEMENTATION OF PLAN.** The provisions of the contingency plan must be carried out by the Permittee immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment (35 IAC 724.151(b)). At a minimum, this includes any fire or explosion which occurs in an area where hazardous waste is being managed (treated, stored, or disposed) (35 IAC 703.241). Within 15 days of any incident that requires implementation of the contingency plan, the owner or operator must submit a written report to the Illinois EPA as required by 35 IAC 724.156(j).
44. **COPIES OF PLAN.** A copy of the contingency plan, including any revisions, must be maintained at the facility and submitted to all local police and fire departments, hospitals and State and local emergency response teams as required by 35 IAC 724.153.
45. **AMENDMENTS TO PLAN.** The Permittee must review and immediately amend, if necessary, the contingency plan, as required by 35 IAC 724.154.
46. **EMERGENCY COORDINATOR.** A trained emergency coordinator must be available at all times in case of an emergency as required by 35 IAC 724.155 and 35 IAC 724.156.

MANIFEST SYSTEM RECORD KEEPING AND REPORTING

47. **MANIFEST SYSTEM.** The Permittee must comply with the manifest requirements of 35 IAC 724.171, 35 IAC 724.172, and 35 IAC 724.176.
48. **OPERATING RECORD.** The Permittee must maintain a written operating record at the facility in accordance with 35 IAC 724.173.

49. ANNUAL REPORT. The Permittee must prepare and submit an annual report to the Illinois EPA prior to March 1st of each year in accordance with the requirements of 35 IAC 724.175.

CLOSURE

50. PERFORMANCE STANDARD. The Permittee must close the facility as required by 35 IAC 724.211 and in accordance with the approved closure plan.
51. AMENDMENT TO CLOSURE PLAN. The Permittee must amend the closure plan whenever there is a change in the expected year of closure or whenever a change in the facility operation plans or facility design affects the closure plan pursuant to 35 IAC 724.212(c).
52. NOTIFICATION OF CLOSURE. The Permittee must notify the Illinois EPA at least 60 days prior to the date it expects to begin closure. (35 IAC 724.212(d))
53. TIME ALLOWED FOR CLOSURE. After receiving the final volume of hazardous waste, the Permittee must treat or remove from the site all hazardous waste and complete closure activities in accordance with the schedule(s) specified in the closure plan. (35 IAC 724.213)
54. DISPOSAL AND/OR DECONTAMINATION OF EQUIPMENT. When closure is completed, the Permittee must decontaminate and/or dispose of all facility equipment and structures as required by the approved closure plan. (35 IAC 724.214)
55. CERTIFICATION OF CLOSURE. When closure is completed, the Permittee must submit certification to the Illinois EPA in accordance with 35 IAC 724.215 that the facility has been closed as specified by the approved closure plan.
56. COST ESTIMATE FOR FACILITY CLOSURE. The Permittee's original closure cost estimate, prepared in accordance with 35 IAC 724.242, must be:
- a. Adjusted for inflation 60 days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with 35 IAC 724.243. However, if the Permittee is using the financial test or corporate guarantee, it must be updated for inflation within 30 days after close of the firm's fiscal year, and before the submission of updated information to the Illinois EPA as specified in 35 IAC 724.243(f).

- b. Revised no later than 30 days after the Illinois EPA has approved a request to modify the closure plan, if the change in the closure plan increases the cost of closure.
 - c. Kept on record at the facility and updated. (35 IAC 724.242)
 - d. Made immediately available to Illinois EPA personnel upon Illinois EPA request.
 - e. Maintained at the value approved by Illinois EPA with annual adjustment for inflation and cannot be decreased unless approved by the Illinois EPA in a permit modification.
57. **FINANCIAL ASSURANCE FOR FACILITY CLOSURE.** The Permittee must demonstrate compliance with 35 IAC 724.243 by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the cost estimates required by the previous Permit Condition. Changes in financial assurance mechanisms must be approved by the Illinois EPA pursuant to 35 IAC 724.243.

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

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

58. **LIABILITY REQUIREMENTS.** The Permittee must demonstrate continuous compliance with the requirements of 35 IAC 724.247 and the documentation requirements of 35 IAC 724.251.
59. **INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS.** The Permittee must comply with 35 IAC 724.248 whenever necessary.

LAND DISPOSAL RESTRICTIONS

60. **DISPOSAL PROHIBITION.** Any waste identified in 35 IAC 728, Subpart C, or any mixture of such a waste with nonrestricted wastes, is prohibited from land disposal unless it meets the standards of 35 IAC 728, Subpart D, or unless it meets the requirements for exemptions under Subpart C. "Land disposal" means placement in or on the land and

includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, or vault intended for disposal.

61. **DILUTION PROHIBITION.** The Permittee must not in any way dilute a restricted waste or residual from treatment of a restricted waste as a substitute for adequate treatment in order to achieve compliance with 35 IAC 728, Subpart D (35 IAC 728.103).
62. **WASTE ANALYSIS.**
 - a. The Permittee must test his waste or extract developed, using the test method identified in Appendix I of 35 IAC Part 728, or use knowledge of the waste, to determine if the waste is restricted from land disposal.
 - b. For any waste with treatment standards expressed as concentrations in the waste extract, the Permittee must test the treatment residues, or an extract of such residues developed using the test method described in Appendix I of 35 IAC Part 728, to assure that the treatment residues or extract meet the applicable treatment standard.
 - c. If the treatment residues do not meet the treatment standards, or if the Permittee ships any restricted wastes to a different facility, the Permittee must comply with the requirements applicable to generators in 35 IAC 728.107 and 35 IAC 728.150(a)(1).
63. **STORAGE RESTRICTIONS.**
 - a. The Permittee must not store hazardous wastes restricted from land disposal under 35 IAC 728, Subpart C unless such wastes are stored only in containers or tanks, and are stored solely for the purpose of the accumulation of such quantities as is necessary to facilitate proper recovery, treatment, or disposal, and: (1) each container is clearly marked to identify its contents and the date each period of accumulation begins; (2) each tank is clearly marked to identify its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, as required by 35 IAC 728.150.
 - b. The Permittee must comply with the operating record requirements of IAC 724.173.
64. **NEW DETERMINATIONS OF PROHIBITED WASTES.** Wastes which are prohibited from land disposal under 35 IAC 728, Subpart C, or for which treatment standards have been established under 35 IAC 728, Subpart D, subsequent to the date of issuance of this Permit, must be subject to Standard Conditions 60 through 63.

POST-CLOSURE

65. **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.
66. **AMENDMENT TO POST-CLOSURE PLAN.** The Permittee must amend the approved post-closure plan whenever a change in the facility operation plans, or facility design affects the approved post-closure plan, or when an unexpected event has occurred which has affected the approved post-closure plan pursuant to 35 IAC 724.218(d).
67. **COST ESTIMATE FOR POST-CLOSURE.** The Permittee's original approved 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 approved post-closure plan increasing the cost of the approved post-closure plan.
 - 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.
68. **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 67. This financial assurance must be maintained at such value throughout the post-closure care period and must be adjusted accordingly pursuant to Standard Condition 67. 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
Materials Management and Compliance Section
2520 West Iles Avenue
P.O. Box 19276
Springfield, IL 62794-9276

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

Section VII: Reporting and Notification Requirements

The reporting and notification requirements of each section of the RCRA permit are summarized below. This summary is provided to highlight the various reporting and notification requirements of this permit.

Condition	Submittal	Due Date
SECTION II: CLOSURE OF MISCELLANEOUS UNITS		
II.D.3	Submit a permit application to modify the closure and post-closure care plan <u>after</u> closure activities started and determine that clean closure cannot be achieved.	Within 30 Days
II.D.3	If a determination is made not to clean close before a closure plan has been implemented, the facility must submit a revised closure plan modification that includes a post-closure plan.	Within 60 Days
II.D.4	Submit Closure certification for the miscellaneous units after the closure of the miscellaneous units has been completed.	Within 60 Days
II.E.2	Adjust cost estimate for inflation.	Annually
II.E.3	Provide financial assurance after a revised cost estimate is approved,	Within 60 Days
SECTION III: GROUNDWATER MONITORING PROGRAM		
III.C.3	Submit notification of damage or compromised structural integrity of groundwater monitoring wells.	Within 30 Days
III.C.5	Submit boring logs, construction diagrams and data sheets for new or replacement groundwater monitoring wells	30 Days
III.C.5	Submit certification that plugging and abandonment of groundwater monitoring well was carried out in accordance with approved procedures.	30 Days
III.I.2	Submit monitoring data for groundwater monitoring wells.	July 15
III.I.5	Report surveyed elevations of groundwater monitoring wells.	Every 5 years or at Illinois EPA request or when elevation changes.
III.I.6	Submit elevations of the bottom of each groundwater monitoring well.	July 15 th

Condition	Submittal	Due Date
SECTION IV: CORRECTIVE ACTION		
IV.D.2.b	Submit ELUC for SWMU 38	Within 90 days of effective date for permit.
IV.D.13.k	Report detailing proposed activities at SWMUs that will be closed as landfills	No later than 60 days prior to the anticipated starting date
IV.E.1	Notification of newly identified SWMUs	No later than 30 days
IV.E.3	Submit SWMU Assessment Plan	Within 90 days of receipt of Illinois EPA's request
IV.F	Notification of release from SWMU	30 days after discovery of release
SECTION V: SPECIAL CONDITIONS		
V.B.2	Contact local emergency response entities <u>after</u> implementation of the contingency plan.	Immediately
V.B.3	Review all components of the contingency plan with local emergency response entities.	Annually
V.D.1	Notify Illinois EPA's Marion Regional Office <u>after</u> implementation of the contingency plan.	Within 24 Hours
V.D.2	Notify Illinois EPA's Marion Regional Office and Materials Management and Compliance Section <u>after</u> cleanup operations have been completed and <u>before</u> resumption of operations whenever the contingency plan is implemented.	15 Days
V.E.1.a	Submit soil investigation reports and evaluation for SWMUs 34 and 39	Within 90 days of effective date for permit.
V.E.1.b	Groundwater monitoring program for SWMU 34.	Within 90 days of effective date for permit.

Condition	Submittal	Due Date
SECTION VI: STANDARD CONDITIONS		
VI.6	Submit a complete application for a new RCRA permit to the Illinois EPA <u>before</u> the current RCRA permit's expiration date.	180 Days
VI.15.b.ii	Operations may commence <u>after</u> not receiving notice from the Illinois EPA of the intent to conduct an inspection.	Within 15 Days
VI.17	Submit a permit modification requesting the revision of ownership and operating rights <u>before</u> the scheduled transfer date.	90 Days
VI.20.a	Notify the Illinois EPA Marion Field Operation Section (618-993-7200) and the National Release Center (1-800-424-8802) orally of any non-compliance <u>after</u> discovering the occurrence.	Within 24 Hours
VI.20.c	Notify the Illinois EPA in writing of any non-compliance <u>after</u> discovering the occurrence.	Within 5 Days
VI.23.a	Notify the Illinois EPA in writing <u>after</u> not being able to reconcile a waste manifest discrepancy.	Within 15 Days
VI.23.b	Notify the Illinois EPA in writing <u>after</u> receiving a shipment of unmanifested waste.	Within 15 Days
VI.23.c	Submit the Annual Report to the Illinois EPA for the previous Callander year <u>before</u> the last day of February.	Prior to March 1 st
VI.29	Notify the Illinois EPA in writing <u>before</u> receiving a shipment of hazardous waste of foreign origin	At least 30 Days
VI.43	Notify the Illinois EPA in writing <u>after</u> an incident causes the Contingency Plan to be implemented at the facility.	Within 15 Days
VI.49	Submit to the Illinois EPA the Annual Report <u>before</u> March 1 each year as required by 35 IAC 724.175.	Prior to March 1 st
VI.52	Notify the Illinois EPA in writing <u>before</u> the commencement of any closure operations	60 Days
VI.56.a	Adjust the financial assurance mechanism for inflation <u>before</u> the anniversary date of the establishment of the mechanism	60 Days

VI.56.b	Revise the financial assurance mechanism <u>after</u> revising the Closure Plan cost estimate.	Within 30 Days
VI.67.a	Adjust the financial assurance mechanism for inflation <u>before</u> the anniversary date of the establishment of the mechanism.	60 Days

ATTACHMENT - A

**Closure Certification Form
(Certification of Completion of RCRA Closure)**

**Dyno Nobel, Inc.
Wolf Lake, Illinois**

**State ID No. 1818995004
Federal ID No. ILD982624777**

RCRA Permit Log No. B-124R2

CERTIFICATION OF COMPLETION OF RCRA CLOSURE

Dyno Nobel, Inc. (1818995004) – Union County

USEPA ID: ILD982624777

RCRA Closure Log No. B-124R2

To meet the requirements of 35 Ill. Adm. Code 724.215, this statement is to be completed by both a responsible officer of the owner/operator (as defined in 35 Ill. Adm. Code 702.126) and by a qualified Illinois licensed professional engineer upon completion of closure of the Sludge Burn Pad and the Southwestern Bulk Explosive Burn Unit. Submit one copy of the certification with original signatures and two additional copies.

The hazardous waste management units, known as the Sludge Burn Pad and the Southwestern Bulk Explosive Burn Unit, at Dyno Nobel have been closed in accordance with the specifications in the approved closure plan. A report documenting that closure has been carried out in accordance with the approved closure 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 gathering 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 ILCS 5/44(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:

ATTACHMENT - B

Approved Cost Estimates for Financial Assurance

**Dyno Nobel, Inc.
Wolf Lake, Illinois**

**State ID No. 1818995004
Federal ID No. ILD982624777**

RCRA Permit Log No. B-124R2

1. Miscellaneous Units Closure Cost Estimate (Based on 2024 Dollars)

Activities	Unit of Measure	Number of Units	Cost per Unit (\$)	Total Cost (\$)
Removal/Disposal of Residual Hazardous Waste				

Bulk Explosive Burn Pad				
Sample Collection	Day	3	\$2,000.00	\$6,000.00
Sand Sample Analysis	Sample	2	\$645.00	\$1,290.00
Decontamination Water Analysis	Sample	2	\$647.00	\$1,294.00
Rinsate Sample Analysis	Sample	1	\$361.00	\$361.00
Contingency Soil Samples Beneath Pad	Sample	16	\$371.00	\$5,936.00
QA/QC Sample Analysis	Sample	7	\$371.00	\$2,597.00
Subtotal for Bulk Explosive Burn Pad				\$17,478.00

Sludge Burn Pad				
Sample Collection	Day	3	\$2,000.00	\$6,000.00
Sand Sample Analysis	Sample	1	\$645.00	\$645.00
Decontamination Water Analysis	Sample	2	\$647.00	\$1,294.00
Refractory Brick Sample Analysis	Sample	1	\$645.00	\$645.00
Rinsate Sample Analysis	Sample	1	\$361.00	\$361.00
Contingency Soil Samples Beneath Pad	Sample	8	\$371.00	\$2,968.00
QA/QC Sample Analysis	Sample	7	\$371.00	\$2,597.00
Subtotal for Sludge Burn Pad				\$14,510.00

Bulk Explosive Burn Pad Removal/Disposal				
Removal of Pad	Lump Sum	1	\$13,650.00	\$13,650.00
Disposal of Sand	Cubic Yard	25	\$146.25	\$3,656.25
Disposal of Concrete	Cubic Yard	50	\$195.00	\$9,750.00
Subtotal of Bulk Explosive Burn Pad Removal/Disposal				\$27,056.25

Activities	Unit of Measure	Number of Units	Cost per Unit (\$)	Total Cost (\$)
Removal/Disposal of Residual Hazardous Waste				

Bulk Explosive Burn Pad				
Triple Rinse Pad and Containerize Fluids for Disposal	Hour	16	\$448.50	\$7,176.00
Transport Pad Rinse Water for Non-Hazardous Off-Site Disposal	Drum	2	\$97.50	\$195.00
Disposal of Rinse Water	Gallon	100	\$3.90	\$390.00
Subtotal for Bulk Explosive Burn Pad				\$7,761.00

Sludge Burn Pad				
Triple Rinse Pad and Containerize Fluids for Disposal	Hour	8	\$448.50	\$3,588.00
Transport Pad Rinse Water for Non-Hazardous Off-Site Disposal	Drum	2	\$97.50	\$195.00
Disposal of Rinse Water	Gallon	100	\$3.90	\$390.00
Subtotal for Sludge Burn Pad				\$4,173.00

Sludge Burn Pad Removal/Disposal				
Removal of Pad	lump sum	1	\$11,050.00	\$11,050.00
Disposal of Refractory Materials	Cubic Yard	3	\$146.25	\$438.75
Disposal of Sand	Cubic Yard	2	\$146.25	\$292.50
Disposal of Concrete	Cubic Yard	10	\$225.00	\$2,250.00
Subtotal of Sludge Burn Pad Removal/Disposal				\$14,031.25

Surrounding Soil Sampling				
Soil Samples	Sample	50	\$371.00	\$18,550.00
QA/QC Sample Analysis	Sample	4	\$371.00	\$1,484.00
Subtotal of Surrounding Soil Sampling				\$20,034.00

Activities	Unit of Measure	Number of Units	Cost per Unit (\$)	Total Cost (\$)
Removal/Disposal of Residual Hazardous Waste				

Background Soil Sampling				
Sample Collection	Day	1	\$2,000.00	\$2,000.00
Soil Samples	Sample	10	\$371.00	\$3,710.00
QA/QC Sample Analysis	Sample	4	\$371.00	\$1,484.00
Subtotal Background Soil Sampling				\$7,194.00

Additional Closure Costs				
Administration of Closure	Lump Sum	1	\$6,000.00	\$6,000.00
Site Health & Safety Plan	Lump Sum	1	\$4,800.00	\$4,800.00
Construction Oversight	Days	4	\$2,875.00	\$11,500.00
Data Evaluation and Reporting	Lump Sum	1	\$12,000.00	\$12,000.00
IL LPE Inspection, Documentation & Certification	Day	1	\$3,000.00	\$3,000.00
Subtotal of Additional Closure Costs				\$37,300.00

Subtotal of Closure+ -Costs	\$149,537.50
Contingency Requirement (20%)	\$29,907.50
Grand Total	\$179,445.00

2. Corrective Action Cost Estimate (Based on 2020 Dollars)

Estimated Cost for Corrective Action	10% Contingency	Grand Total (in 2020 dollars)
\$680,000.00	\$68,000.00	\$748,000.00

ATTACHMENT - C

Approved Permit Application

**Dyno Nobel, Inc.
Wolf Lake, Illinois**

**State ID No. 1818995004
Federal ID No. ILD982624777**

RCRA Permit Log No. B-124R2

ATTACHMENT C - APPROVED PERMIT APPLICATION

I.	Part A Application	March 12, 2021
	Hazardous Waste Permit Information Form	March 12, 2021
	Exhibit A	March 12, 2021
	Item 11 & 12, Topographic Map of 1 mile radius	March 12, 2021
	Item 13 Permitted Unit Photographs	March 12, 2021
	Detail Sketch	March 12, 2021
	Figure 2 Site Plan	March 12, 2021
II.	Part B Facility Description	March 12, 2021
	B.2.1 General Map Requirements	March 12, 2021
	B.4 Traffic Information	March 12, 2021
	B.5.1 Contents of Operating Record	March 26, 2026
	Table B-2 Solid Waste Management Units	March 26, 2026
	Figure B-1 Site Location Map	March 26, 2026
	Figure B-2A Facility Site Plan plus 1000 feet	March 26, 2026
	Figure B-2B Facility Site Plan plus 1000 feet	March 26, 2026
	Figure B-2C Facility Site Plan plus 1000 feet	March 26, 2026
	Figure B-3 Primary Facility Operations Site Plan	March 26, 2026
	Figure B-4 Flood Insurance Rate Map	March 26, 2026
	Figure B-5 Typical Detonator Cross Section	March 26, 2026
III.	Part C Waste Characteristics	July 1, 2021
	Exhibit C (page 39)	July 1, 2021
	Attachment C-1 Supporting Documentation	July 1, 2021
	Attachment C-2 Waste Determination	July 1, 2021
IV.	Part D Process Information	March 12, 2021
	Exhibit D	March 12, 2021
	Attachment D-1 Construction Certification	March 12, 2021
	Attachment D-2 Lifetime Operating Permit	March 12, 2021
	Adjusted Standard AS 00-5	March 12, 2021
	Figure D-1 Open Burn Treatment Unit Site Plan	March 12, 2021
V.	Part E Groundwater Monitoring	March 26, 2026
	Figure E-1	March 26, 2026
VI.	Part F Procedures to Prevent Hazards	March 12, 2021
	Exhibit F	March 12, 2021
	Attachment F-2 SOP PS-WI-38	March 12, 2021

VII.	Evaluation/Assessment of Potential Hazards & Contingency Plans	March 12, 2021
	G.1.1 Executive Summary (page 97)	March 12, 2021
	G.1.2.2 Facility Environs (page 99)	March 12, 2021
	G.1.5 Evaluation-Assessment Report (page 104)	March 12, 2021
	Exhibit G	March 12, 2021
	6.1 Fires and Explosion Control	March 12, 2021
	Exhibit CP	March 12, 2021
	Att. CP-3 Fire/Explosion Plan	March 12, 2021
	Att. CP-4 Hazardous Material Release/Spills Action Plan	March 12, 2021
	Att. CP-5 Facility Emergency Contact List	March 12, 2021
	Att. CP-8 Plant Emergency Evacuation Procedures	March 12, 2021
	Figure CP-1 Facility Site Plan	March 12, 2021
	Attachment G-1	March 12, 2021
VIII.	Part H Personnel Training	March 12, 2021
	Attachment H-1	March 12, 2021
IX.	Part I Closure & Post Closure	August 30, 2024
	I.7 Closure Cost Estimate	August 30, 2024
	Exhibit I Financial Assurance Documentation Letters	March 12, 2021
	From Dyno/Amendment to Irrevocable Standby Letter of Credit	March 12, 2021
	From Wells Fargo	March 12, 2021
	Attachments I-1 Financial Assurance Documentation	
	Irrevocable Standby Letter of Credit	March 12, 2021
	Hazardous Waste Facility Cert. of Liability Insurance	March 12, 2021
	Table 1-1 Closure Cost Estimate	August 30, 2024
X.	Part J Other Federal Laws	March 12, 2021
	Attachment J-1 NPDES Permit ILR001014 for Industrial Storm Water	March 12, 2021
	Attachment J-2 Revised Lifetime Operating Permit	March 12, 2021
XI.	Part K Corrective Action	March 26, 2026
	Attachment K-1 Correspondence re: Corrective Action	March 26, 2026
	Figure K-1 SWMU Location Plan	March 26, 2026
	Attachment 2	
	Certificate of Publication	March 12, 2021
	Mailing List	March 12, 2021
	Part AA Air Standards for Process Vents	March 12, 2021
	Exhibit AA Air Emissions for Equipment Leaks	March 12, 2021
	Part CC Air Emissions for Tanks, Surface Impoundments and Containers	March 12, 2021

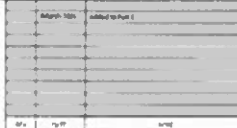
ATTACHMENT - D

Site Layout Map

**Dyno Nobel, Inc.
Wolf Lake, Illinois**

**State ID No. 1818995004
Federal ID No. ILD982624777**

RCRA Permit Log No. B-124R2



ATTACHMENT - E

Chronological Summary of Corrective Action Submittals

**Dyno Nobel, Inc.
Wolf Lake, Illinois**

**State ID No. 1818995004
Federal ID No. ILD982624777**

RCRA Permit Log No. B-124R2

CHRONOLOGICAL SUMMARY OF ILLINOIS EPA ACTIONS

Table H-1 summarizes the corrective action activities completed to date at Dyno Nobel under its RCRA permit (Log No. B-124, B-124R, and associated modifications). This summary is based on a chronological presentation of the various letters sent by the Illinois EPA.

Table H-1		
Log No.	Topic of Submittal	Date of Illinois EPA Letter
B-124-CA-1	Proposed Phase I RFI Workplan for 35 SWMUs at the facility.	September 13, 2001
B-124-CA-1	Extension for Phase II of RFI workplan to January 16, 2004.	November 1, 2003
B-124-CA-2	Modify approved Phase I RFI workplan to supersede B-124-CA-1	December 11, 2001
B-124-CA-3	Cost estimates for closure of Gypsum Ponds (SWMU 2), closure for regulated units, and Corrective Action for the Non-RCRA Open Burn unit (SWMU 47)	July 1, 2003
B-124-CA-3	Illinois EPA response to comments related to issuance of B-124-CA-3	September 2, 2003
B-124-CA-4	Approved Modification to Phase II RCRA facility investigation plan addressing 23 SWMUs.	January 26, 2005
B-124-CA-5 B-124-CA-7 B-124-CA-8	Completion of Phase I RCRA facility investigation. 12 SWMUs received no further action. 23 SWMUs require additional corrective action.	February 10, 2011
B-124-CA-6	Addition of an engineered barrier for SWMU 38. Establishment of institutional controls at SWMU 38. Asphalt parking lot covering portions of SWMUs approved.	March 31, 2010
B-124-CA-9	Additional information in response to an August 22, 2013 letter submitted to the Illinois EPA on behalf of Dyno Nobel.	July 15, 2014
B-124-CA-9	Further investigation efforts at SWMUs 23, 34, 39, and 47. Further soil removal efforts at SWMUs 19 and 20.	July 15, 2014
B-124R-CA-2	Phase II RCRA Investigation and Corrective Action Report. 29 of the 35 SWMUs at the facility completed corrective actions. SWMUs 19, 20, 23, and 47 require no further action. SWMUS 34 and 39 require additional work.	March 10, 2017

ATTACHMENT – F

Details of Issued Corrective Actions

**Dyno Nobel, Inc.
Wolf Lake, Illinois**

**State ID No. 1818995004
Federal ID No. ILD982624777**

RCRA Permit Log No. B-124R2

Issued Corrective Actions

1. On September 13, 2001 (Log No. B-124-CA-1), the Illinois EPA approved the RFI Workplan, dated September 26, 2000. No corrective action was required for SWMUs 24, 25 and 26.
2. On December 11, 2001 (Log No. B-124-CA-2), the Illinois EPA approved two letters submitted October 3, 2001, and October 31, 2001, which were reviewed as modification requests to the approved Phase I RFI Workplan. The modification requests were approved. This December 11, 2001, letter superseded the September 13, 2001, letter (Log No. B-124-CA-1) and, similar to the September 13, 2001, letter, did not contain any corrective action requirements for SWMUs 24, 25 and 26.
3. On July 1, 2003 (Log No. B-124-CA-3), the Illinois EPA approved two submittals: (1) the RCRA Facility Investigation Report dated June 7, 2002; and (2) a July 30, 2002, letter with cost estimates required by the December 11, 2001, Illinois EPA letter. A No Further Remediation/investigation determination was made for eight SWMUs (SWMU 5, 6, 11, 22, 32, 46, 50 and 62).
4. On January 26, 2005 (Log No. B-124-CA-4), the Illinois EPA approved the Phase II RCRA Facility Investigation Workplan. A total of 21 SWMUs were to be addressed during this investigation. Conditions 2.u and 2.v of the B-124-CA-4 letter indicated no samples needed to be collected at SWMUs 63 and 64. In addition, during the course of re-reviewing the results of the Phase I RFI, the Illinois EPA determined that no further action was necessary at SWMU 17.
5. On March 31, 2010 (Log No. B-124-CA-6), the Illinois EPA approved a plan to modify/upgrade the engineered barrier at SWMU 38.
6. On February 10, 2011 (Log Nos. B-124-CA-5, B-124-CA-7, and B-124-CA-8), the Illinois EPA approved no further action determinations for 29 of the SWMUs at the facility. Based on review by the Illinois EPA's review of the Phase II report, additional corrective action efforts are necessary at the remaining six of the SWMUs at the facility.
7. A Phase II RCRA Facility Investigation Report was approved by the Illinois EPA on February 10, 2011 (B-124-CA-8). This letter indicated that corrective action had been completed at 32 of the 35 SWMUs of concern at the facility. The SWMUs requiring additional corrective action are SWMUs 34, 38, and 39. This letter also approved a report documenting construction of an engineered barrier over SWMU 38.
8. On July 15, 2014 (Log No. B-124-CA-9), the Illinois EPA approved further investigation efforts at SWMUs 23, 24, 39, 47 and two soil removals at SWMUs 19 and 20.
9. On March 10, 2017 (Log No. B-124R-CA-2), the Illinois EPA approved further efforts at SWMUs 34 and 39. The Illinois EPA additionally approved no further action for SWMUs 19, 20, 23, and 47.

