

ILLINOIS EPA'S RESPONSE TO COMMENTS
Peoria Disposal Company
Draft Hazardous Waste Management RCRA Permit
Dated July 24, 2024 (Log No. B-24R2)

The Illinois EPA issued the draft renewed RCRA permit (draft permit) to Peoria Disposal Company (PDC) for the PDC Landfill #1 site on July 24, 2024. The draft permit regulates hazardous waste management operations, maintenance and monitoring of the closed hazardous waste landfill (hazardous waste landfill) and treatment facilities. In addition to controlling the landfill during its operational life, this draft permit also requires the landfill to remain controlled through the federal RCRA program during its closure and post-closure period. The site must be monitored and maintained upon closure of the RCRA-regulated units throughout its post-closure care period and any releases must be remediated as necessary during the post-closure care period. These aspects of the renewed RCRA permit have not changed from the draft permit. The Illinois EPA's Bureau of Land Permit Section appreciates the time and effort community members devoted to providing comments on the draft permit.

All comments received during the public comment period have become part of the Illinois EPA Administrative Record and were considered in the renewed RCRA permit decision-making process. Public comments for the draft permit were received from: (1) Heart of Illinois Group Sierra Club, dated September 9, 2024, and received by the Illinois EPA on September 9, 2024; and (2) Peoria Disposal Company, dated September 9, 2024, and received by the Illinois EPA on September 13, 2024,

I. Illinois EPA's Responses to Comments Provided by Heart of Illinois Group Sierra Club, dated September 9, 2024

The following summarize comments and questions proposed by Heart of Illinois Group Sierra Club and the Illinois EPA's responses to them. All "Condition(s)" and "Section(s)" in **Illinois EPA RESPONSE** are reference to the specified condition(s) and sections(s) of this renewed RCRA permit.

Page 1, Paragraphs 1 and 2 Comments:

Heart of Illinois Group Sierra Club has over 300 members in Peoria County who support protection of our environment for our families and our future, and nearly 1000 members and friends across Central Illinois. We thank IEPA for this public comment opportunity and urge your ongoing diligence in inspecting and monitoring this hazardous waste landfill during post-closure.

We ask that IEPA consider planning requirements for a thorough mid-closure assessment before the 30 years monitoring date. This would be to fully evaluate the status of risks for contamination to aquifer sands below and adjacent to the site.

Illinois EPA RESPONSE

The Illinois appreciates the comments from the Heart of Illinois Group Sierra Club. During the operation and closure of the hazardous waste landfill, PDC Landfill #1, there were conditions in multiple sections of the previous permits that outlined requirements for inspections, monitoring, and reporting for the hazardous waste landfill to meet the Federal and State standards of operation and closure of a RCRA hazardous waste landfill in accordance with 35 Ill. Adm. Code Part 724. During the post-closure period of the hazardous waste landfill, the Illinois EPA continues to require inspections, monitoring, and reporting on the required post-closure care activities by the facility through this renewed RCRA permit for the facility to ensure that the human health and the environment are protected from any future potential releases from this closed hazardous waste landfill.

PDC Landfill #1 is currently undergoing post-closure care, closed on January 7, 2014, after final closure was approved for the last disposal area of the facility. This post-closure care began right after final closure and will continue for at least a minimum of 30 years. In accordance with Condition VI.C.1 of the renewed RCRA permit, this post-closure care period must continue to be extended for an additional 30-year period or until such time as no unacceptable risk to human health and environment are present at the landfill.

Page 1, Paragraphs 3 and 4 Comments:

Clearly, PDC was well aware of concerns for waste constituents in the lower sand. Page E-17, paragraph 6, under the heading, "Proposed Parameters to be Monitored for in the Lower Sand," states that, "PDC proposes to monitor the Lower Sand for parameters which were detected in the leachate, the 35 IAC 620.410 parameters that were detected in leachate and indicator parameters that will provide an indication of potential releases from the facility." ¹ [Footnote 1: GFL, Peoria, IEPA draft RCRA Renewal Permit, Volume 5, Groundwater, page E-17, paragraph 6].

It is understood that pollution can spread in unexpected ways and at greater rapidity through sand lenses and layers. It is clear from documentation in the draft Resource Conservation and Recovery Act (RCRA) renewal permit, Section E, in various locations, that concerns for the Sankoty Aquifer are real. We urge the IEPA to assess and be proactive in considerations for the potential need to require permit modifications for added testing, to extend the post-closure monitoring period, or to require preparations for remedial actions to protect the Sankoty Aquifer. Use of the Sankoty for the City of Peoria water supply began at least by 1982. For some time, typically half of the daily intake for the public water supply for Peoria and the other communities served by Peoria water, are taken form Sankoty Aquifer wells to the east of this RCRA site. PDC concurs that "the Lower Sand is the uppermost aquifer under the PDC facility and is continuous and probably in communication laterally, with the regional Groundwater Aquifer, Sankoty Sand." ² [Footnote 2: Ibid, page E-8, paragraph 2].

Illinois EPA RESPONSE

The Illinois appreciates the comments from the Heart of Illinois Group Sierra Club regarding long term monitoring of groundwater beneath the landfill and its proximity to the Sankoty Sands Aquifer. During post-closure care, the facility is required to meet the requirements of Sections VII and VII-A of the renewed RCRA permit which includes requirements to perform semi-annual groundwater sampling, analysis, evaluation of the results, any necessary actions based on those evaluations, and reporting to the Illinois EPA as part of the two (2) groundwater monitoring programs at the site.

In consideration for the possibility of release of contaminants to the aquifer sands below the facility, the Permittee is required to conduct the Shallow Zone Groundwater Observation Monitoring Program which monitors shallow sediments of the Upper Till (Section VII-A). This monitoring program is in place for the explicit purpose of detecting any potential landfill related releases as early as possible before reaching the uppermost aquifer of the facility (Lower Sands). The Detection Monitoring Program, additionally, is designed to evaluate the risks to the uppermost aquifer at the landfill (Lower Sands) during each semi-annual monitoring event (Section VII). At the first sign of a statistically significant increase in groundwater quality for either groundwater monitoring program the Permittee is required to notify the Illinois EPA of potential impacts within seven (7) days of their initial discovery, to initiate further investigations, and establish a Compliance Monitoring Program within ninety (90) days of the discovery of impacts if the change in quality is caused by the landfill (Conditions VII-A.I.10 and VII.I.10, respectively).

The groundwater monitoring parameters identified in List G-1 for both the Detection and Shallow Zone Observation Groundwater Monitoring Programs identified in Conditions VII.D.1 and VII-A.D.1, respectively, are parameters specifically selected as indicator parameters that will provide an indication of potential releases from the facility. Both programs include conditions for providing the Illinois EPA with comprehensive reports on monitoring data and statistical evaluations (Conditions VII.I and VII-A.I) as well as groundwater flow direction and rate to ensure the efficacy of the current monitoring system (Conditions VII.E.2 and VII-A.E.2, respectively). Should a compliance program be established, and groundwater impacts are determined to be caused by the landfill which warrant corrective action, PDC Landfill #1 will be required to establish a Corrective Action Program as required by 35 Ill. Adm. Code 724.199(h).

In regards to long term groundwater monitoring and proactive permit modification, the renewed RCRA permit includes conditions regarding the extension of the post-closure care period (Condition VI.C.1), in particular related to extending the period until such time as there is no unacceptable risk to human health and the environment (Conditions VI.C.1 and VI.C.2). See additional comments in response to "Page 1, Paragraphs 1 and 2 Comments" above. In addition, the renewed RCRA permit requires the reevaluation and

possible expansion of the facility's monitoring well network in regards to its point of compliance well system (Condition X.B.3).

See the Illinois EPA Response to "Page 2, Bullet Point 3 Comment" below for additional discussion of Condition X.B.3 and the public water supply wells.

Page 2, Bullet Points 1 through 5, are from a report done in 2006 by G. Fred Lee, PhD, PE(TX), DEE, regarding the expansion of the PDC Landfill which presents shared concerns by the Heart of Illinois Group Sierra Club for potential pollution of groundwaters. Bullet Points 1 through 5 are listed below, followed by the Illinois EPA responses.

Page 2, Bullet Point 1 Comment

The base of the existing and proposed expansion of the PDC landfill is hydraulically connected to a complex aquifer system that is an important source of domestic water supply for the Peoria area.

Illinois EPA RESPONSE

At the time of writing the 2006 report, an expansion was proposed. Please note there is no current proposal for an expansion. The groundwater monitoring programs required by 35 Ill. Adm. Code 724.198 and Sections VII and VII-A of the renewed RCRA permit are designed to protect the local aquifers.

Page 2, Bullet Point 2 Comment

The PDC landfill liner system, consisting of plastic sheeting and clay layers, will, in time, deteriorate in its ability to prevent hazardous waste leachate from penetrating through it, which can lead to the pollution of groundwaters with hazardous and deleterious chemicals. This will cause the groundwaters to be a health threat to those who use them for domestic water supply and will render the groundwaters unusable for domestic and many other purposes.

Illinois EPA RESPONSE

During the post-closure care period, the final cover system prevents the infiltration of stormwater and the leachate collection system continues to operate and remove leachate from the landfill. In accordance with Conditions VI.C.1 and VI.C.2, the facility will remain in post-closure care as long as the site poses an unacceptable risk to human health and the environment. Leachate will continue to be collected and the liner system maintained as necessary. Furthermore, under Conditions VI.F.3 and VI.F.5, an environmental covenant (EC) will be required to be established to ensure that necessary maintenance, monitoring, and inspection will be conducted in perpetuity for PDC Landfill #1 upon completion of post-closure care under this renewed RCRA permit.

Page 2, Bullet Point 3 Comment

PDC's current and proposed groundwater monitoring system, employing vertical monitoring wells spaced hundreds of feet apart, is inadequate to detect leachate-polluted groundwater when it first reached the point of compliance for groundwater monitoring. This can lead to offsite (adjacent property) pollution of groundwaters, without this pollution having been detected by the monitoring wells.

Illinois EPA RESPONSE

As noted in Illinois EPA comments above, the two (2) groundwater monitoring programs at the facility are designed to detect potential groundwater impacts before reaching the Sankoty aquifer. The renewed RCRA permit requires a minimum of semi-annual assessment of the facility's monitoring networks effectiveness, and a yearly assessment of groundwater flow direction and rate via the reports required by Conditions VII.I, VII-A.I, VII.E.2 and VII-A.E.2, respectively.

- In accordance with Section VII-A, the facility operates the Shallow Zone Groundwater Observation Monitoring Program which provides monitoring of shallow groundwater zones in the Upper Till at the site. This monitoring program is designed to provide groundwater data for any perched groundwater zones on site to forewarn of any releases from the facility to local groundwater.
- In accordance with Section VII, the groundwater monitoring wells installed in the Lower Sands aquifer as part of the facility's Detection Monitoring Program at the facility are located to monitor the uppermost aquifer (Lower Sands). The spacing of these program wells currently ranges from 150 feet east of Area B to 400 feet between monitoring wells R129 and R130 south of Area C-4. The flow of groundwater calculated in recent groundwater flow evaluations shows flow in the northern portion of the facility to be an average of 0.022 feet per day to 0.027 feet per day (8.03 to 9.83 feet per year) and in the southern portion of the facility to be an average of 0.015 feet per day to 0.016 feet per day (5.76 to 5.84 feet per year). Groundwater flow direction has consistently been from northwest to the southeast.

Specific to well spacing and the point of compliance, in accordance with Condition X.B.3, within ninety (90) days of the issuance of the renewed RCRA permit the facility must reassess its point of compliance monitoring wells in the Detection Monitoring Program to ensure adequate well spacing and designations.

The nearest public water supply groundwater wells to PDC Landfill #1 are the Pleasant Valley Public Water District wells, of which the closest well is approximately 1.3 miles south of the facility border. The consistent flow rate and direction in relation to the distance to off-site properties make the risk low to public water supply wells, and the two

(2) monitoring programs operated at the facility are designed to prevent contaminants from impacting off-site groundwater.

Page 2, Bullet Point 4 Comment

PDC's proposed approach for monitoring/maintenance of the landfill cover will not prevent, for as long as the wastes are a threat, water from penetrating through the cover and entering the wastes to generate leachate that will contain hazardous chemicals at concentrations that are a threat to pollute groundwaters.

Illinois EPA RESPONSE

A viable cover is one of the most important mechanisms in preventing leachate generation and ultimately a release of contaminants from the landfill. The final cover system at PDC's hazardous waste landfill was designed to provide long-term minimization of migration of liquids through the closed landfill, function with minimum maintenance, promote drainage, and minimize erosion or abrasion of the cover. The final cover design for PDC Landfill #1 complies with Subpart N of 35 Ill. Adm. Code Part 724.

As demonstrated by the most recent topographic survey, stormwater is well controlled, with little to no run-on. Stormwater run-off is directed off the final cover system to the landfill perimeter and surrounding drainageways to minimize migration of liquids through the closed landfill and erosion of the cover. Additionally, the Illinois EPA requires the Permittee to maintain the final cover system in accordance with Condition VI.E.2.

Page 2, Bullet Point 5 Comment

Overall, PDC's approach toward analyzing the potential threat that the hazardous waste landfill represents to pollute groundwaters is superficial and based on inadequate evaluation of the long-term characteristics of the landfill liner system and the flow paths by which leachate that penetrates through the liner system can pollute groundwaters of the area.

Illinois EPA RESPONSE

In accordance with Condition VI.E.2.b, the leachate collection system will continue to operate until the landfill is no longer producing a volume of leachate that the system is able to collect. By continuously collecting leachate until it is no longer being produced at a collectable volume, the possibility of leachate causing contamination to groundwater is reduced. The landfill liner system is made up of multiple layers providing redundancy and safeguards to protect human health and the environment.

Page 2, Bullet Points 6 through 8, are also from the 2006 report by G. Fred Lee, PhD, PE(TX), DEE, regarding the expansion of the PDC Landfill. These comments are specific to shared

concerns by the Heart of Illinois Group Sierra Club specific to the funding for post-closure monitoring, maintenance and groundwater remediation. Bullet Points 6 through 8 are listed below, followed by the Illinois EPA responses.

Page 2, Bullet Points 6, 7 and 8 Comments

PDC only proposes to provide post-closure care (monitoring and maintenance) of the landfill for the minimum 30-year period. This approach does not conform to Peoria County's requirement of "perpetual care."

PDC has established a post-closure funding approach in the form of a Trust Fund, which will provide for minimal post-closure monitoring and maintenance during a 30-year post-closure care period.

Apparently, PDC's approach to post-closure funding will require that Peoria County provide post-closure funding beyond this minimum 30-year post-closure care period, for the effectively infinite period of time that the wastes in the landfill will be a threat. The required post-closure funding will represent a significant financial burden and liability to the County.

Illinois EPA RESPONSE

In accordance with Condition VI.C.2, post-closure care must continue for at least a 30-year period since final closure and will continue until such time as no unacceptable risks to human health and the environment are present at the landfill, as determined by the Illinois EPA. Post-closure care under this renewed RCRA permit may be terminated by meeting the requirements of 35 IAC Part 724 and Conditions VI.F.3 and VI.F.4 (please also see the Illinois EPA responses to "Page 2, Bullet Point 2 Comment" above). Also, as for financial assurance responsibility for post-closure care, please see the Illinois EPA's response to PDC's "Comment 56: Item 2, Page E-1 in Section II" below.

Page 2, Paragraph 2 Comment

A variety of local news sources reported on Sankoty Aquifer concerns and the PDC/now GFL hazardous waste landfill location. An example is at the link below:

<https://peoriachronicle.com/a-little-remedial-geology/>

Illinois EPA RESPONSE

The Illinois EPA has reviewed the article and acknowledges local concerns for the location of the landfill and the formerly proposed 2006 expansion. The 2006 expansion of the landfill was not approved.

Page 3, Paragraph 1 Comment

Not included in this RCRA draft permit renewal, is any consideration of the pre-regulations barrel and other wastes disposal area PDC used in the early years of their waste operation. Much of that area is related to the Kickapoo Creek flood plain and we continue to have great concerns for potential impacts of unknown wastes with unknown depth and if any liner conditions on the west side of Reservoir Blvd., below the hill where the PDC/GFL RCRA site is located. While we respect that this current permit does not cover the bottomlands area, we raise this issue as an added concern and impetus for the need for close scrutiny and advanced planning regarding the RCRA post-closure permit coverage.

Illinois EPA RESPONSE

This renewed RCRA permit is only applicable to PDC Landfill #1. The concerned area proposed above is not governed by this renewed RCRA permit and therefore cannot be incorporated into the permit.

Page 3, Paragraph 2 Comment

Rapid Climate Change means that ever greater protections of water resources must be done to ensure future generations have sustainable resources for extended droughts, high heat conditions, increased water demands and whatever lies ahead. Because of the proximity to the Kickapoo Creek valley and the known "partially continuous sand seams and perched groundwater zones" identified in parts of the silt layers, we urge your additional planning for proactive next steps regarding the GFL Environmental, Inc. hazardous waste landfill post-closure permit conditions.

Illinois EPA RESPONSE

The Illinois EPA recognizes climate change and its potential impacts to groundwater resources. Specific to groundwater, the 35 Ill. Adm. Code 620 regulations are established to protect current and future groundwater resources. Additionally, Condition XI.A.7 addresses climate considerations for the facility directly, stating:

"The Permittee shall incorporate, as necessary, climate adaptation considerations into the corrective action required at this facility in accordance with the applicable USEPA guidance(s) regarding climate change under RCRA corrective action."

Furthermore, any adverse impact associated with future climate change will be taken into consideration in evaluating post-closure care of the PDC Landfill #1 for unacceptable risks to human health and the environment under the newly established Conditions VI.C.1, VI.C.2, VI.F. 2 and VI.F.3.

II. Illinois EPA's Responses to Comments Provided by Peoria Disposal Company (PDC), dated September 9, 2024

The following lists comments provided by Peoria Disposal Company (PDC), dated September 9, 2024, and the Illinois EPA's responses to them.

Section I - General Facility Description

Comment 1: I .B. Location, Condition I.B.1

Please revise the facility contact number from "(399) 273 3563" to "(309) 637-6243." The number listed is an individual contact number. We request the use of the general contact number for the Regional Environmental Compliance Manager.

Illinois EPA RESPONSE

The facility contact number was revised from "309/273-3563" to "309/637-6243".

Comment 2: I .C. Description of Hazardous and Non-Hazardous Waste Management Activities, Condition I.C.4

Please remove the statement "A WSF is present to solidify non-hazardous wastes" and replace with the following statement: "A WSF is present to 1: store hazardous waste and 2: treat and store non-hazardous hazardous waste. Conditions provided in Section IV.A of this permit must be followed prior to treating hazardous waste." This more accurately describes the use of the WSF at the facility and the requirements to resume treating hazardous waste.

Illinois EPA RESPONSE

Condition I.C.4 has been revised to reflect the proposed language. The statement "A WSF is present to solidify non-hazardous wastes" was replaced with the following statement: "A WSF is present to: (1) store hazardous waste; and (2) treat and store non-hazardous/hazardous waste. The requirements in Condition IV.A must be followed prior to treating hazardous waste."

Section II - Containers

Comment 3: II.A. Summary, Condition II.A

Please revise the first sentence in Section II.A to replace "bulk transport trailers" with "containers" to more accurately describe the containers in use at the facility.

Illinois EPA RESPONSE

The first sentence in Condition II.A was revised to replace “bulk transport trailers” with “containers”.

Comment 4: II.C. Description/Condition of Containers, Condition II.C.3

The citation 40 CFR 172 is not correct and should be revised to reference DOT 49 CFR 172.400 for labeling.

Illinois EPA RESPONSE

The Illinois EPA concurs that 40 CFR should be 49 CFR for hazardous waste transportation. As other parts of 49 CFR 172 also may be applicable under this permit condition, the citation 40 CFR 172 was revised to DOT 49 Code of Federal Regulations (49 CFR) 172.

Comment 5: II.H. Closure Requirements, Condition II.H.2

Please review the second sentence: “Following this, the concrete surfaces shall be steam cleaned or pressure washed, and triple rinsed.” This revision reflects current industry practice.

Illinois EPA RESPONSE

The Illinois EPA concurs with the proposed language. The second sentence of Condition II.H.2 was revised to “Following this, the concrete surfaces shall be steam cleaned or pressure washed, and triple rinsed.”

Comment 6: II.H. Closure Requirements, Condition II.H.7

Please remove the first sentence: “The permittee shall obtain any necessary permits for waste disposal prior to initiating excavation activities.” Please add language, “The Permittee shall obtain disposal permits after soil is excavated and placed in containers.” It is common industry practice to obtain disposal permits after soil is excavated and placed in containers.

Illinois EPA RESPONSE

The purpose of this condition to obtain any “necessary” permits prior to excavation is to avoid creating another hazardous waste management unit or non-compliance with any other local or state permit requirements during a closure. For instance, as proposed by PDC, if the Permittee stores contaminated materials with hazardous waste in a container(s), meeting the requirements of 35 IAC Parts 720 and 724 for such container storage activities for off-site disposal, then a permit is not necessary. However, if

excavation of more than 1-acre in size occurs, then an appropriate construction permit may be necessary from the Illinois EPA Bureau of Water. Furthermore, the Illinois EPA believes that this condition, as currently written, also allows the Permittee more flexibility in the waste management during the closure activities without a need to revise the permit condition should the Permittee decide to seek an alternative way to temporarily store waste during a closure. Condition II.H.7 was not changed.

Section III - Tank Systems

Comment 7: III.A. Summary, Condition III.A.4

Remove "non-hazardous" from the first paragraph of Section III. A and Condition III.A.4. PDC believes that the only required permitting is related to treatment of hazardous waste as described in Section IV.A.

Please revise as follows:

4. One (1) tank, referred to as the Stabilized Base Mixer, is present at the facility which is used to stabilize waste. PDC is permitted to receive non-hazardous waste from off-site generators for treatment. To continue treatment of hazardous waste, PDC is required to submit a new Waste Analysis and Treatment Plan to the Illinois EPA for approval pursuant to Section IV.A of this permit. All landfill areas are now closed and are under post-closure care.

Illinois EPA RESPONSE

The Stabilized Base Mixer Tank is included in this renewed RCRA permit application and is listed in this renewed RCRA permit as it may be allowed to treat hazardous waste should the Permittee meet the requirements to treat hazardous waste in this tank in the future. Thus, the word "non-hazardous" must remain in this condition to clearly state that it is only allowed to treat non-hazardous waste at this time. For that same reason, the statement to indicate that hazardous waste treatment is not allowed in this tank will remain with the word "currently" added to the first sentence. The remaining condition was revised as requested.

Condition III.A.4 was revised to read:

One (1) tank, referred to as the Stabilized Base Mixer, is present at the facility which is used to stabilize non-hazardous waste. The Permittee is permitted to receive non-hazardous waste from off-site generators for treatment. The Permittee is currently not allowed to treat hazardous waste in this unit. To conduct treatment of hazardous waste, the Permittee is required to submit a new Waste Analysis and Treatment Plan to the Illinois EPA for approval pursuant to Condition IV.A of this permit. All landfill areas are now closed and are under post-closure care.

Comment 8: III.B. Waste Identification, Condition III.B.1

For clarification, please revise as follows:

1. PDC is permitted to receive non-hazardous waste from off-site generators for treatment. To continue treatment of hazardous waste, PDC is required to submit a new Waste Analysis and Treatment Plan to the Illinois EPA for approval pursuant to Section IV.A of this permit. All landfill areas are now closed and are under post-closure care.

Illinois EPA RESPONSE

Condition III.B.1 was revised as follows (also see the Illinois EPA response to “Comment 7: III.A. Summary, Condition III.A.4 ”):

The Permittee may treat a total volume of 8,060 gallons/hour of non-hazardous waste in a Stabilized Base Mixer tank subject to the terms of this permit. To continue treatment of hazardous waste, the Permittee is required to submit a new Waste Analysis and Treatment Plan to the Illinois EPA for approval pursuant to Condition IV.A of this permit. The Permittee is currently not allowed to treat hazardous waste.

Comment 9: III.F. Inspections, Condition III.F.3.b

Please revise Condition III.F.3.b. to indicate "steel storage tanks" in lieu of "steel tanks." This condition does not apply to the treatment tank.

Illinois EPA RESPONSE

There is one treatment tank, Stabilized Base Mixer, which is a steel tank. Annual inspection is required for Stabilized Base Mixer. Condition III. F.3.b was not changed.

Comment 10: III.H. Closure Requirements, Condition III.H.2

Please revise as follows to reflect current industry practice:

2. “The surfaces shall be visually inspected, photographed and any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the surfaces must be steam cleaned or pressure washed, and triple rinsed.”

Illinois EPA RESPONSE

The Illinois EPA concurs with the proposed change. Condition III.H.2 was revised to insert “or pressure washed,” after the phrase “steam cleaned”.

Comment 11: III.H. Closure Requirements, Condition III.H.7

Please remove the first sentence: "The Permittee shall obtain any necessary permits for waste disposal prior to initiating excavation activities." Please add language, "The Permittee shall obtain disposal permits after soil is excavated and placed in containers." It is common industry practice to obtain disposal permits after soil is excavated and placed in containers.

Illinois EPA RESPONSE

Please refer to response to Comment 6. Condition III.H.7 was not changed.

Section IV - Containment Building

Comment 12: IV. Summary, Condition IV.A

Please revise the fourth sentence as follows:

"After treatment in a mixer, the waste is moved to the curing area, located south of the WSF, which can contain a maximum of 658 cubic yards of treated waste."

Illinois EPA RESPONSE

The fourth sentence was revised to insert the phrase, "located south of the WSF," as proposed.

Comment 13: IV.B. Waste identification, Condition IV.B.2

Please remove "non-hazardous only" from this condition.

Illinois EPA RESPONSE

As indicated in the previous comments, the Permittee is currently only allowed to treat non-hazardous waste, although this renewed RCRA permit allows for a future treatment of hazardous waste if the requirements in this renewed RCRA permit are met and approved by the Illinois EPA. For this reason, it is essential to state that it is only permitted to treat non-hazardous waste at this time. Condition IV.B.2 was not changed.

Comment 14: IV.C. Design and Operating Requirements, Condition IV.C.10

Please revise as follows:

10. "The Permittee shall require all workers to wear respirators anytime they are within the structure (i.e., at or near the receiving bays, the treatment area or the inside curing area) while the facility is processing bulk/non containerized hazardous waste, except workers inside the sealed cab and office are not required to wear a respirator."

Illinois EPA RESPONSE

The Illinois EPA disagrees with removing the phrase “(receiving/treating)” and inserting the phrase “bulk/non containerized hazardous”. All workers must wear respirators anytime they are within the structure while the facility is processing waste. Condition IV.C.10 was revised as follows:

The Permittee shall require all workers to wear respirators anytime they are within the structure (i.e., at or near the receiving bays, the treatment area or the inside curing area) while the facility is processing (receiving/treating) waste, except workers inside the sealed cab and office are not required to wear a respirator.

Comment 15: IV.C. Design and Operating Requirements, Condition IV.C.11.e

Please replace “Stabilization Clerk” with “Permittee.” There is no Stabilization Clerk on staff.

Illinois EPA RESPONSE

The words, “Stabilization Clerk” were replaced with “Permittee”.

Comment 16: IV.C. Design and Operating Requirements, Condition IV.C.11.f

Please add “or dump trailers” after “treated waste shall be loaded into a roll off box(es)” to reflect current practice. Please replace “Stabilization Clerk” with “Permittee.”

Illinois EPA RESPONSE

The words, “or dump trailers” were added after “treated waste shall be loaded into a roll off box(es)” as proposed. The words, “Stabilization Clerk”, were replaced with “Permittee”.

Comment 17: IV.D. Inspections, Condition IV.D.1

Please add “when the WSF is in operation” after “The Permittee shall inspect the WSF (including the liner and any appurtenance for control of run-on and run-off) on a weekly basis.”

Illinois EPA RESPONSE

The WSF has not been closed and inspection of the WST should continue on a weekly basis. Condition IV. D.1 was not changed.

Comment 18: IV.D. Inspections, Condition IV.D.2

Please indicate a timeframe of “within one business day” instead of “immediately” for the inspection of the WSF required following 3 inches or more of rain in a 24-hour period.

Illinois EPA RESPONSE

The Illinois EPA modified this condition to clarify “immediately”. The timeframe of “within one day”, instead of “within one business day” as requested, replaced “immediately” to avoid the situation that hazardous waste release may last the whole weekend. Condition IV. D.2 was revised as follows:

The Permittee shall inspect the WSF within one day after storms (3 inches or more of rain in a 24-hour period).

Comment 19: IV.F. Closure Requirements, Condition IV.F.2

Please revise as follows to reflect current industry practice:

2. *“The concrete surfaces comprising the WSF shall be visually inspected, photographed and any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete surfaces must be steam cleaned or pressure washed, and triple rinsed.”*

Illinois EPA RESPONSE

The Illinois EPA concurs with the comment. Condition IV.F.2 was revised to add “or pressure washed” after “steam cleaned”.

Comment 20: IV.F. Closure Requirements, Condition IV.F.7

Please remove the first sentence: “The Permittee shall obtain any necessary permits for waste disposal prior to initiating excavation activities.” Please add language, “The Permittee shall obtain disposal permits after soil is excavated and placed in containers.” It is common industry practice to obtain disposal permits after soil is excavated and placed in containers.

Illinois EPA RESPONSE

Please see the Illinois EPA’s response to “Comment 6: II.H. Closure Requirements, Condition II.H.7”. Condition IV.F.7 was not changed.

Section V – Surface Impoundment

Comment 21: V.H. Closure Requirements, Condition V.H.7.c

Please add “as applicable” following “c. Copies of waste manifests.”.

Illinois EPA RESPONSE

The sentence of the third paragraph of Condition V.H.7, “A Closure Documentation Report must be submitted with the closure certification which includes the following

items, if applicable:" includes the information "if applicable". Condition V.H.7.c was not changed.

Comment 22. V.H. Closure Requirements, Condition V.H.8

Please remove the first sentence: "The Permittee shall obtain any necessary permits for waste disposal prior to initiating excavation activities." Please add language, "The Permittee shall obtain disposal permits after soil is excavated and placed in containers." It is common industry practice to obtain disposal permits after soil is excavated and placed in containers.

Illinois EPA RESPONSE

Please see the Illinois EPA's response to " Comment 6: II.H. Closure Requirements, Condition II.H.7". Condition V.H.8 was not changed.

Section VI – Post-Closure

Comment 23: VI.A Summary, Condition VI.A

Please revise the first sentence of the third paragraph as indicated below to be consistent with the language in 35 IAC 724.217. which states post-closure care is required for 30 years. "The post-closure care period for the landfill shall continue for 30 years."

Illinois EPA RESPONSE

The first sentence of the third paragraph of Condition VI.A was revised as follows:

The post closure care period for the landfill shall continue until such time as no unacceptable risks to human health and the environment are present at the landfill, as determined by the Illinois EPA.

Comment 24: VI.A Summary, Condition VI.A

Please replace the last sentence of the third paragraph "A detailed written record of these activities must be kept at the facility" with the following: "Written records of inspections and repairs to monitoring wells and the soil and membrane landfill cover shall be maintained at the facility."

Illinois EPA RESPONSE

The maintained items include not only monitoring wells but also the soil and membrane landfill cover. The Permittee must record any inspections and repairs to other maintained items as well, for example, leachate system. Condition VI.A was not changed.

Comment 25: VI.B. Unit Identification, Condition VI.B.1

Please remove and replace the [entire table below] tabulation of units and their capacities and areas with the following excerpted from Section L.1.1 from the 2017 permit application.

<i>Area</i>	<i>Approximate Volume of Waste In-Place (Cubic Yards)</i>	<i>Approximate Surface Area (Acres)</i>
<i>Area 1</i>	<i>35,000</i>	<i>14</i>
<i>Section A</i>	<i>6,500</i>	<i>8</i>
<i>Section B</i>	<i>190,000</i>	<i>7</i>
<i>Area C</i>	<i>2,638,579</i>	<i>32</i>
<i>Total</i>	<i>2,870,079</i>	<i>61</i>

Illinois EPA RESPONSE

The table in Condition VI.B.1 was revised as below.

Area	Approximate Volume of Waste In-Place (Cubic Yards)	Approximate Surface Area (Acres)
Area 1: Barrel Trench Area	35,000	14
Section A	6,500	8
Section B	190,000	7
Area C: Trenches C1 through C4	2,638,579	32
Total	2,870,079	61

Comment 26: VI.B. Unit Identification, Condition VI.B.2

Please remove the sentence "The slopes of the final cover system are no steeper than 5% grade." Variable landfill slopes are present at the facility.

Illinois EPA RESPONSE

The sentence, "The slopes of the final cover system are no steeper than 5% grade.", was removed.

Comment 27: VI.B. Unit Identification, Condition VI.B.3

Please add the following "and/or a minimum of 10 feet of soil with a maximum permeability of 1×10^{-8} cm/sec" to the first bullet: "Two areas (the Barrel Trench Area and Section A) have compacted soil liners."

Illinois EPA RESPONSE

Condition VI.B.3 was revised to add the following “and/or a minimum of 10 feet of soil with a maximum permeability of 1×10^{-8} cm/sec” to the end of the first bullet.

Comment 28: VI.B. Unit Identification, Condition VI.B.4

The final cover section varies between the different units. Please remove, “4. The components of the final cover system consist of the following from top to bottom.

- *12” blended topsoil layer;*
- *24” minimum protective random fill;*
- *Geotextile (prevents migration of fines & clogging of HDPE drainage net);*
- *HDPE drainage net;*
- *HDPE smooth 40-mil minimum synthetic cover liner (geomembrane);*
- *18” thick impervious fill layer; and*
- *12” thick impervious fill subgrade – random fill (thickness varies).” Please replace with “Landfill final cover construction is documented in the 2017 permit application in Section L Post-Closure, Appendix L-7 As-Built Final Cover Drawings – Area 1, Section A, Section B, and Area C.”*

Illinois EPA RESPONSE

Condition VI.B.4 was updated to reflect the proposed language. The revised condition reads:

Landfill final cover construction is documented in the 2017 permit application in Section L Post-Closure, Appendix L-7 As-Built Final Cover Drawings – Area 1, Section A, Section B, and Area C.

Comment 29: VI.C. Post-Closure Care Period, Condition VI.C.1

Please revise Condition VI.C.1 as indicated below to be consistent with the requirements of 35 IAC 724.217(al. Note. per 35 IAC 724.217(al)(2), the Board, rather than the Illinois EPA. has the authority to shorten or extend the post-closure care period as necessary to adequately protect human health and the environment.

1. “The post-closure care period for the landfill (seven landfill areas) began on January 7, 2014, the date of completion of closure of the final portion of the landfill areas listed in Condition VI.B.1. Post-closure care for the landfill will continue for thirty (30) years after that date.”

Illinois EPA RESPONSE

The first paragraph of Condition VI.C.1 was not changed as “at least” is necessary to be included to reflect the future post-closure care required at PDC Landfill #1. The second

paragraph provides necessary conditions regarding the post-closure care period in accordance with 35 Ill. Adm. Code 703.241 and Section 39(g) of the Environmental Protection Act. Condition VI.C.1 was not changed.

Comment 30: VI.C. Post-Closure Care Period, Condition VI.C.2

Please remove Condition VI.C.2 to be consistent with the requirements of 35 IAC 724.217(a). Note, per 35 IAC 724.217(a)(2), the Board, rather than the Illinois EPA, has the authority to shorten or extend the post-closure care period as necessary to adequately protect human health and the environment.

Illinois EPA RESPONSE

In accordance with 35 Ill. Adm. Code 724.218 (d)(1), the Permittee may submit a written request to amend a post-closure care plan to extend the post-closure care period. In accordance with 35 Ill. Adm. Code 703.241, each RCRA permit issued pursuant to Section 39(d) of the Environmental Protection Act must contain terms and conditions that the Illinois EPA determines are necessary to adequately protect human health and the environment. The landfill was closed with hazardous waste left onsite. The potential risk to human health is not being eliminated. Therefore, the post-closure period of the landfill shall continue for an additional 30-year period or until such time as no unacceptable risks to human health and the environment are present at the landfill, as determined by the Illinois EPA. Condition VI.C.2 was not changed.

Comment 31: VI.D. Inspections, Condition VI.D.1

Please revise “inspection” to “inspect” to correct a typographical error.

Illinois EPA RESPONSE

Condition VI.D.1 was updated to revise “inspection” to “inspect”.

Comment 32: VI.D. Inspections, Condition VI.D.2, Page VI-4 (Pg. 54 of 172)

Please revise to require “inspections within 72 hours of a rainfall event of 3 inches or more in a calendar day” rather than “a 24-hour period”. Hourly rainfall data are not readily available for the facility, and therefore, determining whether 3 inches or more have fallen in a 24-hour period is not practical.

Illinois EPA RESPONSE

This is a standard condition that is required for RCRA post-closure units in Illinois. Three (3) inches of rainfall within a calendar day would not represent the accurate rainfall event that may adversely impact the integrity of the cover system if a storm occurs in a span of two (2) calendar days. 24-hour rainfall data should be readily available through existing

sources, such as National Weather Service or other websites, or a rain gauge(s) may be installed at the facility. Condition VI.D.2 was not changed.

Comment 33: VI.E. Monitoring, Maintenance & Recordkeeping, Condition VI.E.2.a

Please revise the requirement to implement corrective action if cracks or erosion channels greater than 1-inch wide have formed to be consistent with the requirements of 35 IAC 724.410(b)(l). Cracks greater than 1-inch wide can easily form during brief dry periods and will not be identifiable with typical vegetation density and height. Suggested revised language is below:

“Corrective action shall be taken if ponding has been observed, if cracks or erosion channels that compromise the integrity of the final cover have formed, if gas, odor or vector problems arise, if leachate popouts or seeps are present, or if vegetation with tap roots is found to be growing in areas which are not designed to accommodate such.”

Illinois EPA RESPONSE

Condition VI.E.2.a was updated to replace “if cracks or erosion channels greater than one (1) inch wide” with “if cracks or erosion channels greater than six (6) inches deep”.

Comment 34: VI.F. Notices and Certification, Condition VI.F.3

Please delete all language in parentheses from the first sentence, “(e.g., all leachate removed, all waste has been removed, and leachate and groundwater monitoring results do not indicate a potential for migration of waste at levels which may be harmful to human health and the environment)”. Waste will not be removed from the closed landfill. The Permittee proposes to conclude post-closure care in accordance with 35 IAC 724.217.

Illinois EPA RESPONSE

Condition VI.F.3 was updated to delete all language in parentheses from the first sentence and add “when no unacceptable risks to human health and the environment are present in the landfill”.

Comment 35: VI.F. Notices and Certification, Condition VI.F.4.b.v

Please revise "Colored photos" to "Color photos" to correct typographical error.

Illinois EPA RESPONSE

Condition VI.F.4.b.v was updated to revise "Colored photos" to "Color photos".

Section VII - Groundwater Detection Monitoring Program

Comment 36: VII-A.C. Well Location and Construction, Condition VII-A.C.3

Please include, "A proposal for the replacement of the subject well shall accompany this notification. Well repairs will be allowed in addition to well replacement, particularly if only the surface casing is damaged."

Illinois EPA RESPONSE

The Illinois EPA has reviewed the current language found in Condition VII-A.C.3 and elsewhere within Section VII-A. Condition VII-A.C.1 denotes the ability and requirement to maintain wells utilized by the facility for the Groundwater Observation Monitoring Program. Routine repairs upon damaged wells are expected to be included within the purview of Condition VII-A.C.1. Therefore, the current language is sufficient to allow proposal of repairs rather than replacement. Condition VII-A.C.3 was not changed.

Comment 37: VII.D. Monitoring Parameters, Condition VII.D.1

Please add a note to lists G1 and G2 to indicate that groundwater monitoring results for total and dissolved iron will not be subject to statistical comparison. Iron is not a hazardous waste constituent as defined in 35 IAC 721 Appendix H.

Illinois EPA RESPONSE

The Illinois EPA has reviewed Condition VII.D.1 and other conditions in Section VII regarding this comment. While 35 Ill. Adm. Code 721, Appendix H does not list total or dissolved iron as a hazardous constituent, 35 Ill. Adm. Code 620.410 Groundwater Quality Standards for Class I: Potable Resources for Groundwater does include a groundwater standard for iron. The note at the end of List G2 that pertains to both List G1 and List G2 states:

“Should a parameter be detected in groundwater and found to be statistically above background the subsequent monitoring event must include total (unfiltered) analysis and comparison to the appropriate 35 Ill. Adm Code Part 620, Class I, Groundwater Quality Standard must then take place.”

As iron is listed in the Class I Groundwater Quality Standards, and the Permittee is required to compare statistically significant increases above background to Class I Groundwater Quality Standards, it has been determined at this time that dissolved and total iron must continue to be statistically compared to background. Condition VII.D.1 was not changed.

Section VII-A: Shallow Zone Groundwater Observation Monitoring Program

Comment 38: VII-A.D. Monitoring Parameters, Condition VII-A.D.1

Please also add a note to Condition VII-A.D.1 indicating specific conductance and total organic carbon will not be subject to statistical comparisons. Specific conductance and total organic carbon are not hazardous waste constituents as defined in 35 IAC 721 Appendix H.

Illinois EPA RESPONSE

The Illinois EPA has reviewed Condition VII-A.D.1 and other conditions in Section VII-A regarding this comment. The Illinois EPA agrees that conductance and total organic carbon are not listed as hazardous waste constituents as defined by 35 Ill. Adm. Code 721, Appendix H. However, in accordance with 35 Ill. Adm. Code 724.198(f), the Permittee must determine whether there is statistically significant evidence of contamination for any chemical parameter or hazardous constituent specified in the renewed RCRA permit pursuant to 35 Ill. Adm. Code 724.198(a) which states the following:

“The owner or operator must monitor for indicator parameters (e.g., specific conductance, total organic carbon, or total organic halogen), waste constituents or reaction products that provide a reliable indication of the presence of hazardous constituents in groundwater. The Agency must specify the parameters or constituents to be monitored in the facility permit, after considering the following factors:

- 1) The types, quantities, and concentrations of constituents in wastes managed at the regulated unit;
- 2) The mobility, stability, and persistence of waste constituents or their reaction products in the unsaturated zone beneath the waste management area;
- 3) The detectability of indicator parameters, waste constituents, and reaction products in groundwater; and
- 4) The concentrations or values and coefficients of variation of proposed monitoring parameters or constituents in the groundwater background.”

The fact that conductance and total organic carbon are not hazardous waste constituents does not affect the requirement for statistical analysis. Condition VII-A.D.1 was not changed.

Section VIII -General Requirements

Comment 39: VIII Closure Requirements for Accumulation Areas, Condition 36

Please modify Section to read. "The Permittee shall close container storage area, tank, drip pads, or containment building, including the Curing Area located South of the WSF used for the accumulation of on-site generated hazardous waste in accordance with the requirements identified in 35 Ill. Adm. Code 722. 117(a)(8). This requirement is applicable to storage areas used on or after this section was amended at 44 Ill. Reg. 15263. effective September 3, 2020."

Illinois EPA RESPONSE

The Illinois EPA concurs with the proposed language. Condition VIII.36 was updated to add the following ", including the Curing Area located south of the WSF" after the words "containment building".

Section IX - Reporting and Notification Requirements

Comment 40: Section VII, Condition VII.I.10.b

Please revise due date for condition VII.I.10.b to "Within 24 hours after a statistically significant increase is discovered."

Illinois EPA RESPONSE

The Illinois EPA concurs with adding the term "statistically significant increase" as it provides clarification and considers the proposal to add "within 24 hours" reasonable and adequate to meet the requirements of 35 Ill. Adm. Code 724.198(g)(2). Reporting and Notification Requirements in Section IX for Condition VII.I.10.b was revised as indicated below:

I.10.b	Sample groundwater in all wells for Appendix I constituents	Within 24 hours after a statistically significant increase is discovered
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Comment 41: Section VII-A, Condition VII-A.I.10.b

Please revise due date for condition VII-A.I.10.b to "Within 24 hours after a statistically significant increase is discovered."

Illinois EPA RESPONSE

The Illinois EPA concurs adding the term "statistically significant increase" as it provides clarification and considers the proposal to add "within 24 hours" reasonable and adequate to meet the requirements of 35 Ill. Adm. Code 724.198(g)(2). Reporting and Notification

Requirements in Section IX for Condition VII-A.I.10.b was revised as indicated below:

I.10.b	Sample groundwater in all wells for Appendix I constituents	Within 24 hours after a statistically significant increase is discovered
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Comment 42: Section XI, Condition XI.D.1

Please revise the due date for notification of newly identified SWMU(s) or AOC(s) from “within 30 days of discovery” to “within 60 days of discovery.”

Illinois EPA RESPONSE

In general, newly identified SWMU(s) or AOC(s) is related to hazardous contamination release. The permittee is required to notify the Illinois EPA as soon as possible. Condition XI.D.1 was not changed.

Section X - Special Conditions

Comment 43: B. Compliance Schedule, Condition X.B.2

*Requesting modification to this Section, “Detailed Closure Plan for the Waste Stabilization Facility (WSF): Within sixty (60) days of the effective date of this Permit, the Permittee must submit a detailed closure plan for the WSF, including all units listed in Condition IV.8.2, including the Curing Area south of the WSF as a Class 1 * permit modification. The Permittee shall use the Illinois EPA’s Guidance for Preparing RCRA Closure Plans, which can be found on the Illinois EPA’s website.”*

Illinois EPA RESPONSE

The Illinois EPA concurs with including the Curing Area located south of the WSF. Condition X.B.2 was updated to read as follows:

Within sixty (60) days of the effective date of this Permit, the Permittee must submit a detailed closure plan for the WSF, including all units listed in Condition IV.B.2 and the Curing Area located south of the WSF, as a Class 1* permit modification. The Permittee shall use the Illinois EPA’s Guidance for Preparing RCRA Closure Plans, which can be found on the Illinois EPA’s website.

Comment 44: B. Compliance Schedule, Condition X.B.3

The permittee has previously demonstrated the sufficiency of the groundwater monitoring network as documented in the 2017 permit application. Please remove Condition X.B.3.

Illinois EPA RESPONSE

The facility statement is inadequate to demonstrate removal of Condition X.B.3 is necessary; therefore, no change has been made. An adequate number of wells must be designated as point of compliance wells and/or additional wells must be proposed in the modification request to meet the requirements of 35 Ill. Adm. Code 724.195.

Section XI - Corrective Action for Solid Waste Management Units

Comment 45: XI.B. Continued Corrective Action Requirements, Condition XI.B.2

Please correct the numbering of conditions in this section. "Condition XI.B.4" should be renumbered "Condition XI.B.2" and "Condition XI.B.4" should be renumbered "Condition XI.B.3".

Illinois EPA RESPONSE

The last two conditions in Section XI.B were renumbered as "Condition XI.B.2" and "Condition XI.B.3" respectively.

Comment 46: XI.D. Requirements for Addressing Newly Identified SWMU(s) and AOC(s), Condition XI.D.1

Please revise the due date for notification of newly identified SWMU(s) or AOC(s) from "no later than thirty (30) days of discovery" to "no later than 60 days of discovery." [Condition C.1 in Section XI of the 2014 RCRA permit.]

Illinois EPA RESPONSE

In general, newly identified SWMU(s) or AOC(s) is related to hazardous contamination release. The permittee is required to notify the Illinois EPA as soon as possible. Condition XI.D.1 was not changed.

Comment 47: XI.D. Requirements for Addressing Newly Identified SWMU(s) and AOC(s), Condition XI.D.4

Please revise the due date to implement a SWMU Assessment Plan after approval or approval with conditions by Illinois EPA from "45 days" to "60 days" of receiving such written notification.

Illinois EPA RESPONSE

Illinois EPA can agree with the facility's request to allow for additional 15 days to implement a SWMU Assessment Plan. Condition XI.D.4 was updated to revise the due

date to implement a SWMU Assessment Plan after approval or approval with conditions by Illinois EPA from “45 days” to “60 days” of receiving such written notification.

Comment 48: XI.D. Requirements for Addressing Newly Identified SWMU(s) and AOC(s), Condition XI.D.5

Please correct typographical error in the first sentence of Condition XI.D.5. “Approved SWMU Assessment Alan” should be revised to “Approved SWMU Assessment Plan.”

Illinois EPA RESPONSE

The typographical error was corrected. “Approved SWMU Assessment Alan” was revised to “Approved SWMU Assessment Plan.”.

Comment 49: XI.E. Future Releases from SWMUs, Condition XI.E

Please revise the due date of notification to Illinois EPA for a release discovered from a SWMU in the future from “within thirty (30) days after its discovery” to “within 60 days after its discovery.” [Condition C.1 in Section XI of the 2014 RCRA permit]

Illinois EPA RESPONSE

In general, newly identified SWMU(s) or AOC(s) is related to hazardous contamination release. The permittee is required to notify the Illinois EPA as soon as possible. Condition XI.E was not changed.

Attachment A- General Inspection Schedule

Comment 50: Safety/Emergency Equipment

Please revise line item “540 gpm centrifugal pumps” to “200-350 gpm pumps.”

Please remove the following line items, as they are not present on site on a permanent basis. If needed, earthmoving equipment and water truck(s) are contracted by the site and only retained on site when in use.

- 25-lb dry chemical fire extinguishers
- 25-lb CO₂ fire extinguishers
- Earthmoving equipment
- 2,000 gal. water truck with pressure pump, hose, nozzles

Illinois EPA RESPONSE

The Illinois EPA concurs with the proposed change. The following four (4) items were deleted: 25-lb dry chemical fire extinguishers, 25-lb CO2 fire extinguishers, Earthmoving equipment, and 2,000 gal. water truck with pressure pump, hose, nozzles. The item “540 gpm centrifugal pumps” was revised to “200-350 gpm pumps.”

Comment 51: Emergency Communications/Alarms

Please remove “Private Band Radio” and replace with “cell phones.” A private band radio is not currently in use.

Illinois EPA RESPONSE

The item, “Private Band Radio”, was replaced with “cell phones”.

Comment 52: Security Devices

Please remove “Detex clocks and key stations”. These are no longer in use.

Illinois EPA RESPONSE

The item, “Detex clocks and key stations”, was deleted.

Comment 53: Operation and Structural Equipment - Surface Impoundments

Please revise inspection frequencies for run-on and runoff control systems, wind dispersal control system, and leachate collection from “weekly and after storms” to “weekly and after a 3-inch precipitation event in a calendar day”.

Illinois EPA RESPONSE

Inspection frequencies for run-on and runoff control systems, wind dispersal control system, and leachate collection were updated from “weekly and after storms” to “weekly and after a 3-inch precipitation event in 24 hours”.

Comment 54: Solids Storage Building (tanks)

Please revise the inspection frequency for all items that indicate a daily inspection frequency to “Daily when equipment and area is in operation; otherwise, weekly”.

Illinois EPA RESPONSE

The Illinois EPA concurs with the proposed inspection frequency. The inspection frequency for all items that indicates a daily inspection frequency was updated to “Daily when equipment and area is in operation; otherwise, weekly”.

Comment 55: Operating and Structural Equipment, Page A-4

Please remove the following line items which are no longer in use or present on site:

- “Drum crusher
- Conveyers
- Mixer”

Illinois EPA RESPONSE

The requested items, Drum crusher, Conveyers, and Mixer, were removed.

Attachment E - Closure and Post-Closure Cost Estimates

Comment 56: Item 2, Page E-1

Please revise the third sentence of Item 2 as indicated below. There is no regulatory requirement to maintain financial assurance for thirty years of post-closure care until certification of post-closure care is accepted by Illinois EPA.

“The approved post-closure cost estimate at the time of issuance of this renewed RCRA permit is \$3,342,258 (in 2019 dollars) as provided in Appendix I-8 of the approved permit application which has been adjusted for inflation. These estimates must be used when establishing financial assurance in accordance with 35 Ill. Adm. Code 724, Subpart G. However, the post-closure cost estimate must be updated in accordance with Condition X.B.1 to maintain post-closure care until a certification of post-closure care is accepted by the Illinois EPA.”

Illinois EPA RESPONSE

Historically, during the post-closure care period, the facility’s financial assurance liability has been allowed to be reduced based on the number of years of post-closure care that had been completed by the Illinois EPA. However, this reduction did not take into consideration the financial risk to the Illinois EPA and citizens of Illinois, if the Illinois EPA would have to unexpectedly assume operation of the post-closure care at the facility. The Illinois EPA has evaluated the requirements for post-closure care, cost estimates, and financial assurance for the hazardous waste management unit(s) under 35 IAC Parts 703 and 724. To address such financial risk, the Illinois EPA has determined that financial assurance for a 30-year post-closure care cost estimate, at a minimum, must be maintained by the facility, as required in 35 Ill. Adm. Code 703.241(a). Condition E.2 in Attachment E was not changed.