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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

(ILLINOIS EPA)

IN RE: PROPOSED EXTENSION OF POST-CLOSURE CARE FOR
HAZARDOUS WASTE LANDFILL RCH NEWCO II, LLC IN LEMONT

Public

Hearing in the above-entitled cause, commencing at
6:32 p.m. on the 19th day of April, 2023.

1 MR. GUY: Okay. We're going to go
2 ahead and get started with this public
3 hearing. The current time is 6:32 Central
4 Time. And good evening on behalf of the
5 Illinois Environmental Protection Agency
6 and its director, John Kim. Welcome to
7 tonight's hearing. My name is Jeff Guy,
8 and I am the Illinois EPA hearing officer.
9 We look forward to receiving your comments
10 after tonight's opening remarks. If you
11 have connection or audio issues, please
12 attempt to reconnect.

13 This hearing is being held
14 pursuant to regulatory procedures for
15 permit and closure plan hearings, which can
16 be found at Title 35 Illinois
17 Administrative Code Part 166, Subpart A.
18 These regulations are available on the
19 Illinois Pollution Control Board website at
20 pcb.illinois.gov. Again, that's
21 pcb.illinois.gov. My responsibility this
22 evening as the hearing officer is to ensure
23 that this hearing is conducted in a fair
24 and orderly manner according to these

1 regulations.

2 This hearing is being
3 transcribed by a court reporter, and the
4 transcript of this hearing will be posted
5 on the Illinois EPA Bureau of Land public
6 notice web page in the same place where the
7 hearing notice and other pertinent
8 documents have been posted for public
9 review.

10 The Illinois EPA has tentatively
11 determined that the post-closure care
12 period for the RCH Newco facility in
13 Lemont, Illinois needs to be extended. A
14 representative from the Illinois EPA Bureau
15 of Land will provide more information on
16 this momentarily.

17 The Illinois EPA is conducting a
18 public comment period, including this
19 public hearing, to provide an opportunity
20 for the public to comment on this matter
21 prior to making a final determination. The
22 Illinois EPA is accepting written public
23 comments during the comment period. As
24 indicated in the public hearing notice,

1 which is shared on the screen, written
2 comments must be received no later than
3 11:59 p.m. Central Time on May 19th, 2023
4 and should be submitted via e-mail to --
5 I'm going to give you an e-mail address --
6 epa.publichearingcom@illinois.gov, and that
7 is also provided in the public notice.
8 Again, that's
9 epa.publichearingcom@illinois.gov. Or they
10 can be mailed to the Illinois EPA,
11 attention myself, Jeff Guy, Hearing
12 Officer, PO Box 19276, 1021 North Grand
13 Avenue, Springfield, Illinois 62974-9276.
14 Again, this information is provided in the
15 public notice. Please reference "RCH
16 Newco" in your e-mail or letter.

17 Written comments are given the
18 same consideration as oral comments made
19 during this hearing and may be submitted to
20 the Illinois EPA at any time during the
21 comment period. Although we will continue
22 to accept written comments through May
23 19th, 2023, tonight is the only time that
24 we will accept oral comments. The Illinois

1 EPA will fully consider and respond to all
2 significant oral and written comments.

3 At this time, a representative
4 from the Illinois EPA Bureau of Land will
5 provide information we believe is relevant
6 to tonight's hearing. This will be
7 followed by additional instructions from me
8 on how we will receive public comments.

9 MR. WATSON: Good evening. My
10 name's Rob Watson. I've been the manager
11 of the Resource Conservation and Recovery
12 Act Unit, otherwise known as the "RCRA"
13 Unit, since 2018. The RCRA Unit is within
14 the Permit Section of the Bureau of Land
15 within the Illinois EPA. In that capacity,
16 I'm responsible for management of the
17 hazardous waste permitting and corrective
18 action programs in the State of Illinois.
19 I recently retired from the Illinois EPA,
20 but am currently working under contract as
21 the RCRA Unit manager.

22 I'm a professional engineer and
23 have worked for the Illinois EPA for almost
24 40 years. I spent all but one and a half

1 years of that time in the Bureau of Land
2 Permit Section, and most of that time was
3 involved in the permitting of hazardous
4 waste facilities.

5 The purpose of my statement at
6 this public hearing is to provide a brief
7 overview of the permitting history related
8 to the RCH Newco facility in Lemont,
9 Illinois, current site conditions, and the
10 regulations governing the hazardous waste
11 landfill at the site, all of which served
12 as the basis for Illinois EPA's tentative
13 determination that post-closure care needs
14 to be extended at that landfill.

15 In the early 1990s, the RCH
16 Newco facility, formerly known as CECOs,
17 constructed a hazardous waste landfill in
18 Lemont, Illinois in accordance with the
19 closure plan. The landfill is
20 approximately two acres in size and
21 contains electric arc furnace dust, also
22 know as EAF dust, which is a hazardous
23 waste due to lead and cadmium. The EAF
24 dust is mixed in with non-hazardous slag.

1 The bottom liner consists of three feet of
2 recompacted clay, and the final cover
3 consists of two feet of compacted clay, one
4 and one half feet of fill, and one half a
5 foot of topsoil with vegetation.

6 On February 7, 1996, the
7 Illinois EPA determined that post-closure
8 care for the landfill began on January 1st,
9 1993. Thus, the regulatory required
10 30 years of post-closure care would last
11 until at least January 1 of 2023.

12 Post-closure care included requirements for
13 monitoring, maintaining, and repairing the
14 cover system as well as monitoring of the
15 groundwater.

16 On August 29, 1996, the Illinois
17 EPA issued a modification to the
18 closure/post-closure plan, which is Log No.
19 C-68-M-5. Included in that modification
20 was a condition stating that, pursuant to
21 35 Illinois Administrative Code 703.121(b),
22 the facility must also eventually obtain a
23 RCRA post-closure permit.

24 The groundwater monitoring

1 results indicate that the hazardous waste
2 constituents in the landfill have not
3 leaked out of the landfill during the past
4 30 years. Currently, there is no leachate
5 collection or monitoring system in the
6 landfill.

7 The management of hazardous
8 waste in Illinois is regulated under RCRA
9 and the federal/state regulations developed
10 under it. These regulations give the
11 Illinois EPA the authority to review and
12 approve the design, construction,
13 operation, monitoring, maintenance,
14 closure, and post-closure care of units
15 used to manage hazardous waste in the State
16 of Illinois.

17 The regulations for landfills
18 are designed to remove liquids and keep the
19 waste within the landfill as dry as
20 possible. The landfill's liner and cover
21 systems are designed to prevent liquids,
22 such as precipitation and groundwater, from
23 getting into the waste. This is because
24 minimizing the amount of liquid within a

1 landfill minimizes the potential for the
2 movement of hazardous constituents from
3 within the landfill out into the
4 environment.

5 It's also important to note that
6 the RCRA regulations are necessarily broad
7 in nature, and USEPA has issued many
8 guidance documents, technical memos, and
9 letters to address more specific
10 situations. These documents are available
11 for use by both facilities and regulators
12 for the operation and regulation of
13 hazardous waste sites.

14 In this case, the landfill's
15 currently regulated under the Interim
16 Status regulations at Title 35 Illinois
17 Administrative Code Part 725. Title 35
18 Illinois Administrative Code
19 Section 725.218 includes provisions that
20 allow Illinois EPA to extend the
21 post-closure care period of a hazardous
22 waste landfill if we determine that it is
23 necessary to protect human health and the
24 environment. The regulations require

1 Illinois EPA to public notice our tentative
2 decision to extend the post-closure period,
3 review any comments received during the
4 comment period, and, if necessary, hold a
5 public hearing, such as this one here
6 tonight, prior to making a final
7 determination regarding the post-closure
8 care of the facility.

9 Illinois EPA informed the
10 facility of its tentative decision to
11 extend post-closure care at the facility in
12 a letter dated November 15, 2022. The
13 letter identified the reasons why extending
14 post-closure care is needed to protect
15 human health and the environment. As a
16 recap of that letter: Hazardous waste
17 remains in the landfill. The landfill
18 liner and cover design does not meet the
19 minimum technology requirements for
20 landfills currently required by the
21 hazardous waste landfill regulations,
22 relev- -- and the relevant regulations are
23 cited in the letter.

24 The landfill does not have a

1 leachate monitoring or collection system,
2 so it cannot be determined if leachate is
3 present in the landfill. The presence of
4 liquids within a landfill increases the
5 risk of an unforeseeable and unknown
6 release of hazardous constituents into the
7 environment, if unmonitored.

8 And continued long-term care of
9 a landfill in the form of maintenance,
10 monitoring, and legally enforceable
11 controls is required to ensure that neglect
12 or future activities of a landfill do not
13 result in the release of hazardous waste or
14 hazardous constituents that could threaten
15 human health and the environment.

16 As noted in the letter, a viable
17 cover is one of the most important
18 mechanisms offering environmental
19 protection. It was noted in the letter
20 that the cover was not properly maintained,
21 and well-established tap roots were growing
22 on the landfill and into the landfill.

23 The November 15th, 2022, letter
24 also made the tentative determination for

1 the facility to submit an application for a
2 RCRA hazardous waste permit for the
3 landfill once a final determination is
4 made.

5 Should the Illinois EPA's final
6 determination affirm its tentative
7 decision, the extended post-closure care
8 for the facility would be conducted in
9 accordance with a RCRA hazardous waste
10 post-closure permit pursuant to Title 35
11 Ill. Adm. Code Section 703.121 as well as
12 Condition 1.b of the modified RCRA closure
13 plan Log No. C-68-M-5 that was issued on
14 August 29, 1996, rather than the closure
15 plan the facility has been regulated under
16 for the past 30 years.

17 As noted by the Hearing Officer,
18 the purpose of this public hearing is to
19 provide a forum for the public to provide
20 comments on the Illinois EPA's tentative
21 decision to extend the post-closure care
22 period of the RCH Newco facility's
23 hazardous waste landfill. Upon conclusion
24 of this public hearing and a follow-up

1 post-hearing comment period, the Illinois
2 EPA will review all comments received and
3 take said comments into consideration when
4 deliberating and finalizing our
5 determination. Thank you.

6 MR. GUY: Thank you, Mr. Watson.

7 If you have extensive comments
8 this evening, please consider giving only a
9 summary of those comments and then
10 submitting the entirety of your comments to
11 the Illinois EPA before the end of the
12 comment period on May 19th, 2023.

13 While the record is open, all
14 comments will be placed into the hearing
15 record as exhibits. If anyone does not
16 wish to make comments or if we cannot
17 accommodate everyone who wishes to make
18 comments this evening, for whatever reason,
19 please submit your comments to the Illinois
20 EPA in writing. Again, written comments
21 are given the same consideration as
22 comments made orally during this hearing.

23 As the hearing officer, I intend
24 to treat everyone in a respectful manner,

1 and I ask that Illinois EPA staff and the
2 public please do the same. Comments should
3 be relevant to issues associated with the
4 Illinois EPA's tentative decision --
5 determination rather -- to extend the
6 post-closure period.

7 If your comments fall outside of
8 the scope of this hearing, I may ask you to
9 proceed to another issue. Again, all
10 significant comments, written or oral, will
11 be addressed as part of the Illinois EPA
12 responsiveness summary. The responsiveness
13 summary will also provide a statement of
14 the Illinois EPA's final determination in
15 this matter. All who provide their e-mail
16 address, mailing address, or submit written
17 comments during the comment period will be
18 notified of the Illinois EPA's final
19 determination in this matter and the
20 availability of the responsiveness summary,
21 which will be posted on the Illinois EPA
22 Bureau of Land public notice web page.

23 The Illinois EPA public notice
24 for this hearing required registration by

1 April 17th, 2023, to provide oral comments
2 during tonight's hearing. It should be
3 noted that the Illinois EPA did not receive
4 any request to provide comments during
5 tonight's hearing. Regardless, the
6 Illinois EPA will -- at this time will
7 allow oral public comments for the record.
8 So if you want to provide a comment, please
9 use the 'Raise Hand' feature. And when I
10 call on you to speak, be sure to unmute
11 your line. Please state your name and
12 affiliation for the record. And for the
13 benefit of creating an accurate record,
14 please spell your last name. Please keep
15 your comments courteous and on-topic, and
16 keep your comments no longer than five
17 minutes in length.

18 We're going to give it a few
19 minutes to see if there's anyone that may
20 connect and wish to make comments. Again,
21 that can be done by using the 'Raise Hand'
22 feature on the WebEx.

23 (A short break was had.)

24 MR. GUY: Just to repeat, the

1 Illinois EPA public notice did require
2 registration by April 17th, 2023, to
3 provide oral public comments this evening.
4 And although the Illinois EPA did not
5 receive any requests to provide comments
6 tonight, we are allowing oral comments by
7 using the 'Raise Hand' feature, if you
8 would like to provide oral comments.

9 So at this time, we're going to
10 wait just a few more minutes. We don't
11 have anyone on the call. And we'll give it
12 just a few more minutes, and if we don't
13 have anyone wishing to make oral comments,
14 we'll go ahead and conclude our public
15 hearing this evening. So we're going to
16 wait just a few more minutes. Thank you.

17 (A short break was had.)

18 MR. GUY: Okay. Well, that's going
19 to conclude our public hearing this
20 evening. If you did not present oral
21 comments tonight but still wish to comment,
22 please submit your comments -- your written
23 comments to the Illinois EPA, as directed
24 in the public notice, which can be accessed

1 at the Illinois EPA Bureau of Land public
2 notice web page. Written comments will be
3 included in the hearing record and reviewed
4 by the Illinois EPA as the responsiveness
5 summary is prepared. The record closes at
6 11:59 p.m. Central Time on May 19, 2023.
7 Please send your written comments to the
8 attention of myself, Jeff Guy, as indicated
9 in the public notice.

10 Pertinent documents are
11 available on the Illinois EPA Bureau of
12 Land public notice web page and at the
13 Illinois EPA office located at 1021 North
14 Grand Avenue East, Springfield, Illinois
15 62794 -- I'm sorry -- 62974. You can
16 obtain copies of available documents
17 through a Freedom of Information Request to
18 the Illinois EPA. This can be done through
19 our website, or you can contact myself
20 directly if you need help with this
21 request. I think I might have to re- --
22 correct the zip code. 62974 -- 62794.
23 This must be a typo in my notes.

24 Again, you can obtain copies of

1 available documents through a Freedom of
2 Information Request to the Illinois EPA.
3 That can be done through our website, or
4 you can contact myself directly if you need
5 help.

6 Thank you for your participation
7 this evening. The current time is
8 6:56 p.m. Central Time, and this hearing is
9 adjourned.

10 (Which were all the proceedings had
11 at this time in the above-entitled
12 cause.)
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