

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

BRUCE RAUNER, GOVERNOR

LISA BONNETT, DIRECTOR

Voice: (217) 278-5800

FAX: (217) 278-5808

June 24, 2015

Ron Welk
Vice President of Development and Operations
Clinton Landfill, Inc.
4700 North Sterling Drive
Peoria, Illinois 61615-3647

Re: LPC#0390055036—DeWitt County
Clinton/Clinton Landfill #3
Compliance File

Dear Mr. Welk:

On June 3, 2015 an inspection of the above referenced site was conducted by Dustin Burger representing the Illinois Environmental Protection Agency. The purpose of this inspection was to determine the site's compliance with the Illinois Environmental Protection Act and 35 Illinois Administrative Code G regulations.

While no violations were noted at the time of this inspection.

For your information, a copy of the inspection report is enclosed. Please contact Dustin Burger at (217) 278-5800 if you have any questions regarding this inspection.

Sincerely,



John P. Richardson, Acting Manager
Field Operations Section
Bureau of Land

Enclosure

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
811 Solid Waste Landfill Inspection Checklist**

County: DeWitt LPC#: 0390055036 Region: 4 - Champaign
 Location/Site Name: Clinton/Clinton Landfill #3
 Date: 06/03/2015 Time: From 10:50A To 11:45A Previous Inspection Date: 02/24/2015
 Inspector(s): Dustin Burger Weather: Cloudy, dry, mild sw winds, 70s
 No. of Photos Taken: # 6 Samples Taken: Yes # No
 Interviewed: Dave Byrant, Manager Facility Phone No.: 217/935-8028

Permitted Owner Mailing Address

Clinton Landfill 3
4700 Sterling Ave. P.O. Box 9071
Peoria, IL 61612-9071

Permitted Operator Mailing Address

Clinton Landfill 3
9550 Heritage Road-C
Clinton, IL 61727

Chief Operator Mailing Address

Ron Welk
4700 Sterling Ave. P.O. Box 9071
Peoria, IL 616-9071

Certified Operator Mailing Address

Ron Welk
4700 Sterling Ave. P.O. Box 9071
Peoria, IL 616-9071

AUTHORIZATION:

Significant Modification Permit
Initial: 2005-070-LF
Latest Mod 53 Exp. 2/15/17

OPERATIONAL STATUS:

Operating
 Closed-Not Certified.
 Closed-Date Certified:

TYPE OF OPERATION:

Existing Landfills 814-Subpart C
 814-Subpart D
 New Landfills: 811-Putres./Chem.

	SECTION	DESCRIPTION	VIOL
ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS			
1.	9(a)	CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS	<input type="checkbox"/>
2.	9(c)	CAUSE OR ALLOW OPEN BURNING	<input type="checkbox"/>
3.	12(a)	CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLINOIS	<input type="checkbox"/>
4.	12(d)	CREATE A WATER POLLUTION HAZARD	<input type="checkbox"/>
5.	12(f)	CAUSE, THREATEN OR ALLOW DISCHARGE WITHOUT OR IN VIOLATION OF AN NPDES PERMIT	<input type="checkbox"/>
6.	21(a)	CAUSE OR ALLOW OPEN DUMPING	<input type="checkbox"/>
7.	21(d)	CONDUCT ANY WASTE-STORAGE, WASTE-TREATMENT, OR WASTE-DISPOSAL OPERATION:	
	(1)	Without a Permit or in Violation of Any Conditions of a Permit (See Permit Provisions)	<input type="checkbox"/>
	(2)	In Violation of Any Regulations or Standards Adopted by the Board	<input type="checkbox"/>
8.	21(e)	DISPOSE, TREAT, STORE, OR ABANDON ANY WASTE, OR TRANSPORT ANY WASTE INTO THE STATE AT/TO SITES NOT MEETING REQUIREMENTS OF ACT AND REGULATIONS	<input type="checkbox"/>
9.	21(f)(1)	CONDUCT ANY HAZARDOUS WASTE-STORAGE, TREATMENT OR DISPOSAL OPERATION WITHOUT A RCRA PERMIT.	<input type="checkbox"/>

10.	21(o)	CONDUCT A SANITARY LANDFILL OPERATION WHICH RESULTS IN ANY OF THE FOLLOWING CONDITIONS:	
	(1)	Refuse in Standing or Flowing Water	<input type="checkbox"/>
	(2)	Leachate Flows Entering Waters of the State	<input type="checkbox"/>
	(3)	Leachate Flows Exiting the Landfill Confines	<input type="checkbox"/>
	(4)	Open Burning of Refuse in Violation of Section 9 of the Act	<input type="checkbox"/>
	(5)	Uncovered Refuse Remaining From Any Previous Operating Day or at the Conclusion of Any Operating Day	<input type="checkbox"/>
	(6)	Failure to Provide Final Cover Within Time Limits	<input type="checkbox"/>
	(7)	Acceptance of Wastes Without Necessary Permits	<input type="checkbox"/>
	(8)	Scavenging as Defined by Board Regulations	<input type="checkbox"/>
	(9)	Deposition of Refuse in Any Unpermitted Portion of the Landfill	<input type="checkbox"/>
	(10)	Acceptance of Special Waste Without a Required Manifest	<input type="checkbox"/>
	(11)	Failure to Submit Reports Required by Permits or Board Regulations	<input type="checkbox"/>
	(12)	Failure to Collect and Contain Litter by the End of each Operating Day	<input type="checkbox"/>
	(13)	Failure to Submit Any Cost Estimate, Performance Bond or Other Security	<input type="checkbox"/>
11.	21(t)	CAUSE OR ALLOW A LATERAL EXPANSION OF A MUNICIPAL SOLID WASTE LANDFILL (MSWLF) UNIT WITHOUT A PERMIT MODIFICATION	<input type="checkbox"/>
12.	21.6(b)	ACCEPTANCE OF LIQUID USED OIL FOR FINAL DISPOSAL (EFFECTIVE JULY 1, 1996)	<input type="checkbox"/>
13.	22.01	FAILURE TO SUBMIT ANNUAL NONHAZARDOUS SPECIAL WASTE	<input type="checkbox"/>
14.	22.17	LANDFILL POST-CLOSURE CARE	
	(a)	Failure to Monitor Gas, Water, Settling	<input type="checkbox"/>
	(b)	Failure to Take Remedial Action	<input type="checkbox"/>
15.	22.22(c)	ACCEPTANCE OF LANDSCAPE WASTE FOR FINAL DISPOSAL	<input type="checkbox"/>
16.	22.23(f)(2)	CAUSE OR ALLOW THE DISPOSAL OF ANY LEAD-ACID BATTERY	<input type="checkbox"/>
17.	22.28(b)	ACCEPTANCE OF WHITE GOODS FOR FINAL DISPOSAL	<input type="checkbox"/>
18.	55(b)(1)	ACCEPTANCE OF ANY USED OR WASTE TIRE FOR FINAL DISPOSAL (UNLESS LANDFILL MEETS EXEMPTION OF 55(b)(1))	<input type="checkbox"/>
19.	56.1(a)	CAUSE OR ALLOW THE DISPOSAL OF ANY POTENTIALLY INFECTIOUS MEDICAL WASTE	<input type="checkbox"/>
SOLID WASTE SITE OPERATOR CERTIFICATION LAW REQUIREMENTS			
20.	225 ILCS 230/1004	CAUSING OF ALLOWING OPERATION OF A LANDFILL WITHOUT PROPER COMPETENCY CERTIFICATE	<input type="checkbox"/>
35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G			
PRIOR CONDUCT CERTIFICATION REQUIREMENTS			
21.	745.181	CHIEF OPERATOR REQUIREMENTS	<input type="checkbox"/>
22.	745.201	PRIOR CONDUCT CERTIFICATION PROHIBITIONS	<input type="checkbox"/>
SPECIAL WASTE HAULING REQUIREMENTS			
23.	809.301	REQUIREMENTS FOR DELIVERY OF SPECIAL WASTE TO HAULERS	<input type="checkbox"/>

24.	809.302(a)	REQUIREMENTS FOR ACCEPTANCE OF SPECIAL WASTE FROM HAULERS	<input type="checkbox"/>
25.	809.501	MANIFESTS, RECORDS, ACCESS TO RECORDS, REPORTING REQUIREMENTS AND FORMS	
	(a)	Delivery of Special Waste to Hauler	<input type="checkbox"/>
	(e)	Retention of Special Waste Manifests	<input type="checkbox"/>
NEW SOLID WASTE LANDFILL REQUIREMENTS			
	PART 811 SUBPART	GENERAL STANDARDS FOR ALL LANDFILLS	
26.	811.103	SURFACE WATER DRAINAGE	
	(a)	Runoff from Disturbed Areas	<input type="checkbox"/>
	(b)	Diversion of Runoff from Undisturbed Areas	<input type="checkbox"/>
27.	811.104	SURVEY CONTROL	
	(a)	Boundaries Surveyed and Marked	<input type="checkbox"/>
	(b)	Stakes and Monuments Marked	<input type="checkbox"/>
	(c)	Stakes and Monuments Inspected	<input type="checkbox"/>
	(d)	Control Monument Established and Maintained	<input type="checkbox"/>
28.	811.105	COMPACTION	<input type="checkbox"/>
29.	811.106	DAILY COVER	
	(a)	Six Inches Soil	<input type="checkbox"/>
	(b)	Alternative Daily Cover	<input type="checkbox"/>
30.	811.107	OPERATING STANDARDS	
	(a)	Phasing of Operations	<input type="checkbox"/>
	(b)	Work Face Size and Slope	<input type="checkbox"/>
	(c)	Equipment	<input type="checkbox"/>
	(d)	Utilities	<input type="checkbox"/>
	(e)	Maintenance	<input type="checkbox"/>
	(f)	Open Burning	<input type="checkbox"/>
	(g)	Dust Control	<input type="checkbox"/>
	(h)	Noise Control	<input type="checkbox"/>
	(i)	Vector Control	<input type="checkbox"/>
	(j)	Fire Protection	<input type="checkbox"/>
	(k)	Litter Control	<input type="checkbox"/>
	(l)	Mud Tracking	<input type="checkbox"/>
	(m)	Liquid Restrictions for MSWLF Units	<input type="checkbox"/>
31.	811.108	SALVAGING	
	(a)	Salvaging Interferes with Operation	<input type="checkbox"/>
	(b)	Safe and Sanitary Manner	<input type="checkbox"/>
	(c)	Management of Salvagable Materials	<input type="checkbox"/>
32.	811.109	BOUNDARY CONTROL	
	(a)	Access Restricted	<input type="checkbox"/>
	(b)	Proper Sign Posted	<input type="checkbox"/>

33.	811.110	CLOSURE AND WRITTEN CLOSURE PLAN	
	(a)	Final Slopes and Contours	<input type="checkbox"/>
	(b)	Drainage Ways and Swales	<input type="checkbox"/>
	(c)	Final Configuration	<input type="checkbox"/>
	(d)	Written Closure Plan	<input type="checkbox"/>
	(e)	Initiation of Closure Activities at MSWLF Units	<input type="checkbox"/>
	(f)	Completion of Closure Activities at MSWLF Units	<input type="checkbox"/>
	(g)	Deed Notation for MSWLF Units	<input type="checkbox"/>
34.	811.111	POST-CLOSURE MAINTENANCE	
	(a)	Procedures After Receipt of Final Volume of Waste	<input type="checkbox"/>
	(b)	Remove All Equipment of Structures	<input type="checkbox"/>
	(c)	Maintenance and Inspection of the Final Cover and Vegetation	<input type="checkbox"/>
	(d)	Planned Uses of Property at MSWLF Units	<input type="checkbox"/>
35.	811.112	RECORDKEEPING REQUIREMENTS FOR MSWLF UNITS	
	(a)	Location Restriction Demonstration	<input type="checkbox"/>
	(b)	Load Checking Requirements	<input type="checkbox"/>
	(c)	Gas Monitoring Records	<input type="checkbox"/>
	(d)	MSWLF Liquid Restriction Records	<input type="checkbox"/>
	(e)	Groundwater Monitoring Program Requirements	<input type="checkbox"/>
	(f)	Closure and Post Closure Care Requirements	<input type="checkbox"/>
	(g)	Cost Estimates and Financial Assurance Requirements	<input type="checkbox"/>
	PART 811 SUBPART C	PUTRESCIBLE AND CHEMICAL WASTE LANDFILLS	
36.	811.302	FACILITY LOCATION	
	(c)	Site Screening (Does Not Apply To Part 814-Subpart D Sites)	<input type="checkbox"/>
37.	811.309	LEACHATE TREATMENT AND DISPOSAL SYSTEM	
	(a)	General Requirements	<input type="checkbox"/>
	(c)	Standards for On-Site Treatment and Pretreatment	<input type="checkbox"/>
	(d)	Standards for Leachate Storage System	<input type="checkbox"/>
	(e)	Standards for Discharge to Off-Site Treatment	<input type="checkbox"/>
	(f)	Standards for Leachate Recycling Systems	<input type="checkbox"/>
	(g)	Standards for Leachate Monitoring Systems	<input type="checkbox"/>
38.	811.310	LANDFILL GAS MONITORING (FOR SITES ACCEPTING PUTRESCIBLE WASTE)	
	(b)	Location and Design of Gas Monitoring Wells	<input type="checkbox"/>
	(c)	Monitoring Frequency for Landfill Gas	<input type="checkbox"/>
	(d)	Monitoring Parameters	<input type="checkbox"/>
39.	811.311	LANDFILL GAS MANAGEMENT SYSTEM (FOR CHEMICAL AND PUTRESCIBLE LANDFILLS)	
	(a)	Conditions for Installation of Gas Management System	<input type="checkbox"/>
	(b)	Notification and Implementation Requirements	<input type="checkbox"/>
	(c)	Standards for Gas Venting	<input type="checkbox"/>
	(d)	Standards for Gas Collection	<input type="checkbox"/>

40.	811.312	LANDFILL GAS PROCESS AND DISPOSAL SYSTEM	
	(c)	No Unpermitted Gas Discharge	<input type="checkbox"/>
	(d)	Gas Flow Rate Measurements into Treatment of Combustion Device	<input type="checkbox"/>
	(e)	Standards for Gas Flares	<input type="checkbox"/>
	(f)	Standards for On-Site Combustion of Landfill Gas Using Devices Other Than Flares	<input type="checkbox"/>
	(g)	Gas Transported Off-Site	<input type="checkbox"/>
41.	811.313	INTERMEDIATE COVER	
	(a)	Requirements for the Application for Intermediate Cover	<input type="checkbox"/>
	(b)	Runoff and Infiltration Control	<input type="checkbox"/>
	(c)	Maintenance of Intermediate Cover	<input type="checkbox"/>
42.	811.314	FINAL COVER SYSTEM (DOES NOT APPLY TO PART 814 SITES THAT HAVE CLOSED, COVERED AND VEGETATED PRIOR TO SEPTEMBER 18, 1990)	
	(a)	General Requirements	<input type="checkbox"/>
	(b)	Standards for Low Permeability Layer	<input type="checkbox"/>
	(c)	Standards for Final Protective Layer	<input type="checkbox"/>
43.	811.316	PLUGGING AND SEALING OF DRILL HOLES	<input type="checkbox"/>
44.	811.321	WASTE PLACEMENT	
	(a)	Phasing of Operations	<input type="checkbox"/>
	(b)	Initial Waste Placement	<input type="checkbox"/>
45.	811.322	FINAL SLOPE AND STABILIZATION	
	(a)	Grade Capable of Supporting Vegetation and Minimizing Erosion	<input type="checkbox"/>
	(b)	Slopes Required to Drain	<input type="checkbox"/>
	(c)	Vegetation	<input type="checkbox"/>
	(d)	Structures Built over the Unit	<input type="checkbox"/>
46.	811.323	LOAD CHECKING PROGRAM	
	(a)	Load Checking Program Implemented	<input type="checkbox"/>
	(b)	Load Checking Program for PCB's at MSWLF Units	<input type="checkbox"/>
	(c)	Load Checking Program Components	<input type="checkbox"/>
	(d)	Handling Regulated Hazardous Wastes	<input type="checkbox"/>
	PART 811 SUBPART D	MANAGEMENT OF SPECIAL WASTES AT LANDFILLS	
47.	811.402	NOTICE TO GENERATORS AND TRANSPORTERS	<input type="checkbox"/>
48.	811.403	SPECIAL WASTE MANIFESTS REQUIREMENTS	<input type="checkbox"/>
49.	811.404	IDENTIFICATION RECORD	
	(a)	Special Waste Profile Identification Sheet	<input type="checkbox"/>
	(b)	Special Waste Recertification	<input type="checkbox"/>
50.	811.405	RECORDKEEPING REQUIREMENTS	<input type="checkbox"/>
51.	811.406	PROCEDURES FOR EXCLUDING REGULATED HAZARDOUS WASTES	<input type="checkbox"/>

PART 811 SUBPART G		FINANCIAL ASSURANCE	
52.	811.700	COMPLY WITH FINANCIAL ASSURANCE REQUIREMENTS OF PART 811, SUBPART G	<input type="checkbox"/>
53.	811.701	UPGRADING FINANCIAL ASSURANCE	<input type="checkbox"/>
54.	811.704	CLOSURE AND POST-CLOSURE CARE COST ESTIMATES	<input type="checkbox"/>
55.	811.705	REVISION OF COST ESTIMATE	<input type="checkbox"/>
SOLID WASTE FEE SYSTEM REQUIREMENTS			
56.	Part 858 Subpart B	MAINTAINED, RETAINED & SUBMITTED DAILY & MONTHLY SOLID WASTE RECORDS AND QUARTERLY SOLID WASTE SUMMARIES WHERE INCOMING WASTE IS WEIGHED (LIST SPECIFIC SECTION	<input type="checkbox"/>
57.	Part 858 Subpart C	MAINTAINED, RETAINED & SUBMITTED DAILY & MONTHLY SOLID WASTE RECORDS AND QUARTERLY SOLID WASTE SUMMARIES WHERE INCOMING WASTE IS NOT WEIGHED (LIST SPECIFIC	<input type="checkbox"/>
OTHER REQUIREMENTS			
58.	OTHER:	APPARENT VIOLATION OF: <input type="checkbox"/> PCB; <input type="checkbox"/> CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	<input type="checkbox"/>
59.			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>

Informational Notes

- [Illinois] Environmental Protection Act: 415 ILCS 5/4.
- Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
- Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers. Requirements of some statutes and regulations cited are in summary format. Full text of requirements can be found in references listed in 1. and 2. above.
- The provisions of subsection (o) of Section 21 of the [Illinois] Environmental Protection Act shall be enforceable either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.
- This inspection was conducted in accordance with Sections 4(c) and 4(d) of the [Illinois] Environmental Protection Act: 415 ILCS 5/4(c) and (d).
- Items marked with an "NE" were not evaluated at the time of this inspection.

Illinois Environmental Protection Agency
Bureau of Land ♦ Field Operations Section ♦ Champaign

LPC#0390055036—DeWitt County
Clinton/Clinton Landfill #3
FOS File
June 3, 2015 Inspection
Inspector: Dustin Burger
GIS Information from BOL Inventory: N40.11507 W-88.9589

Narrative Inspection Report

I conducted a routine inspection at the above referenced facility on June 3, 2015. This inspection was conducted to determine the regulatory status and evaluate compliance with the Environmental Protection Act (Act) and Title 35 Illinois Administrative Code, Subtitle G: Land Pollution (Regulations). Dave Bryant, the Site Manager accompanied me during the visit. Six (6) photos were taken of Unit #3. The weather was mostly cloudy and dry, with temperatures in the 70s.

Site Inspection

When I arrived at the landfill I checked in at the landfill office. Mr. Bryant was in a phone conference, but excused himself to accompany me on the inspection. We first looked at the now closed Units #1 and #2 before starting at the Chemical Waste Unit (CWU) at Unit #3.

The CWU was open but no trucks were present dumping waste at the time of the inspection. The CWU is currently taking two types of waste, a salt waste from 3M mentioned in previous inspections and coal combustion ash from Archer, Daniels, Midland in Decatur. The floor of the eastern portion of the CWU was now fully covered with ash (see photos 1-2).

We also looked at the south sedimentation pond. The pond was partially full, and had plenty of freeboard. Bryant said that water had been sampled and discharged approximately two weeks before.

We then drove to the municipal solid waste unit (MSW) which was very active. The active area was located in the newly permitted Sections 3C and 5B. Approximately half of the floor of the new cells, primarily in Section 3C, had been covered with the first lift of waste. The first lift of waste across the floor of the cell consists of ten feet of uncompacted waste. Trucks drive on the deposited waste and dump their loads near the edge. Heavy equipment then pushes the waste over the edge and onto the floor of the cell to create the first lift. With this method the heavy equipment never drives on the engineered liner and eliminates the possibility of damaging the liner with the bulldozers or compactors.

We also looked at the waste solidification unit located on top of Cell 1C (photo 3). Section V.B of Clinton Landfill's permit authorizes the facility to solidify liquid waste. The waste includes industrial wastes and sludges, as well as leachate generated from the landfill's Municipal Solid Waste (MSW) unit. The liquid waste is discharged into a steel railcar buried in the cover on top of the landfill over previously deposited waste. Bottom ash is stored in a large temporary tent and is added to the liquid waste and mixed with a trackhoe to solidify the material until the resultant mixture passes the paint filter test. The liquid/ash mixture is then placed in the active fill. The unit was not active during the inspection, but was in use earlier to solidify leachate.

We then drove the perimeter of the landfill, looking for any errant litter. During my previous inspection I had noted litter along the eastern treeline. The plastic bags previously noted had been removed and the area was clean.

We then visited the scalehouse to look at waste shipment documentation. No new special wastes had been accepted since my last inspection, so I did not check any waste profile documents during this visit. The largest generator of special wastes is still a manufactured gas plant project from Dixon, Illinois. The waste is not actually MGP waste, but consists of stormwater from the excavation. Waste profile analysis did not detect any organic constituents of concern, but the water would fail discharge limits because of suspended solids.

The gas system was operating normally. The landfill has placed gas lines from Unit #3 to the gas-to-energy plant located northwest of Unit #2. The gas-to-energy plant was running and was handling all the gas generated at the site. The facility has flares installed that handle any gas generated should the energy plant shut down.

Leachate from Unit #3 is collected from the leachate collection system and is pumped into a 20,000 gallon, double-walled underground tank north of Unit #3. Leachate from the MSW unit is either hauled to the Bloomington-Normal Water Reclamation District or solidified on-site. The facility has recently submitted a permit to recirculate leachate through two vertical wells/sumps.

Bryant said they had been hauling large amounts of leachate lately. The increase is related to the opening of the new cells. The new cells have an area of seven acres. Once waste is placed into the cell, all precipitation that falls into the cell is considered leachate. A wet spring means that thousands of gallons of leachate are generated from each rain event. The leachate is pumped out quickly, leaving the floor of the cell dry.

Permitting

The facility is operating under permit 2005-070-LF, which expires on February 15, 2017. The permit renewal application was granted in Modification 29 on July 7, 2012. The permit includes a 157.451 acre waste disposal area with a gross airspace of 32,014,225 cubic yards. At current waste disposal rates, the space is estimated to last 45 years.

Permit Modification 51 was issued on February 27, 2015. This modification allows the use of auto shredder waste for daily cover.

Modification 52 was issued on April 10, 2015. This modification approved 1) the use of Unit #3 gas at the gas-to-energy plant, 2) revisions to the gas well field and gas headers, and 3) approves the operation of newly constructed cells 3C and 5B consisting of 7 acres, 4) revised the closure-post closure cost estimates to reflect the opening of the new cells.

Modification 53; issued on April 16, 2015 approved the alternate source demonstration for 2nd quarter groundwater monitoring exceedences and new AGQS values to reflect additional parameters required by 35 IAC 620 and Condition VIII.25 of the permit.

The estimate for closure of the current landfill's 39.8 acres of municipal solid waste disposal and 6.14 acres comprising the CWU is \$11,746,868. This value includes \$5,462,480 for premature closure, and \$6,284,388 for post-closure care.

Summary of Apparent Violations

No violations were noted during the inspection



Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC #0390055036—DeWitt County
Clinton/Clinton Landfill
FOS File

DATE: June 3, 2015
TIME: 10:30-11:30
DIRECTION: Southwest
PHOTO by: Dustin Burger
PHOTO FILENAME:
0390055036~06032015-001.jpg
COMMENTS: CWU



DATE: June 3, 2015
TIME: 10:30-11:30
DIRECTION: Southwest
PHOTO by: Dustin Burger
PHOTO FILENAME:
0390055036~06032015-002.jpg
COMMENTS: CWU





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC #0390055036—DeWitt County
Clinton/Clinton Landfill
FOS File

DATE: June 3, 2015
TIME: 10:30-11:30
DIRECTION: Southwest
PHOTO by: Dustin Burger
PHOTO FILENAME:
0390055036~06032015-003.jpg
COMMENTS: Solidification unit



DATE: June 3, 2015
TIME: 10:30-11:30
DIRECTION: Southwest
PHOTO by: Dustin Burger
PHOTO FILENAME:
0390055036~06032015-004.jpg
COMMENTS: Active area



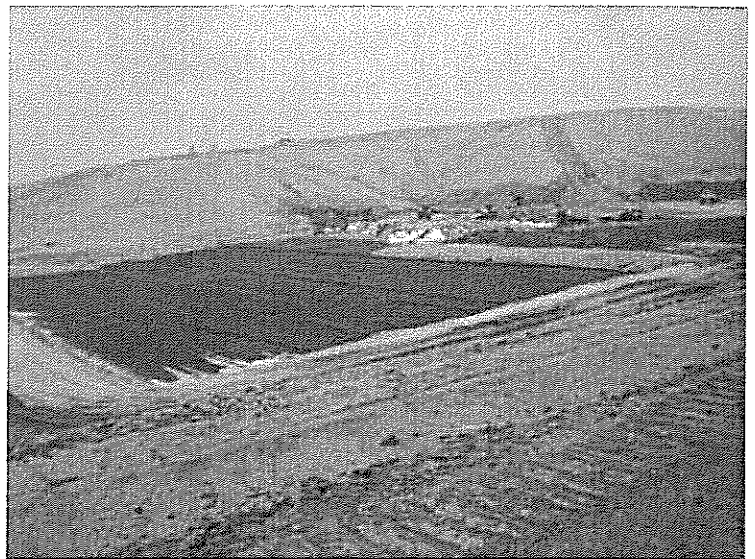


Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC #0390055036—DeWitt County
Clinton/Clinton Landfill
FOS File

DATE: June 3, 2015
TIME: 10:30-11:30
DIRECTION: Southwest
PHOTO by: Dustin Burger
PHOTO FILENAME:
0390055036~06032015-005.jpg
COMMENTS: Active area advancing
across the floor of new cell



DATE: June 3, 2015
TIME: 10:30-11:30
DIRECTION: Southwest
PHOTO by: Dustin Burger
PHOTO FILENAME:
0390055036~06032015-005.jpg
COMMENTS: South sedimentation pond



Clinton Landfill, Inc.
Leachate Management Summary
Annual 2014
(Gallons)

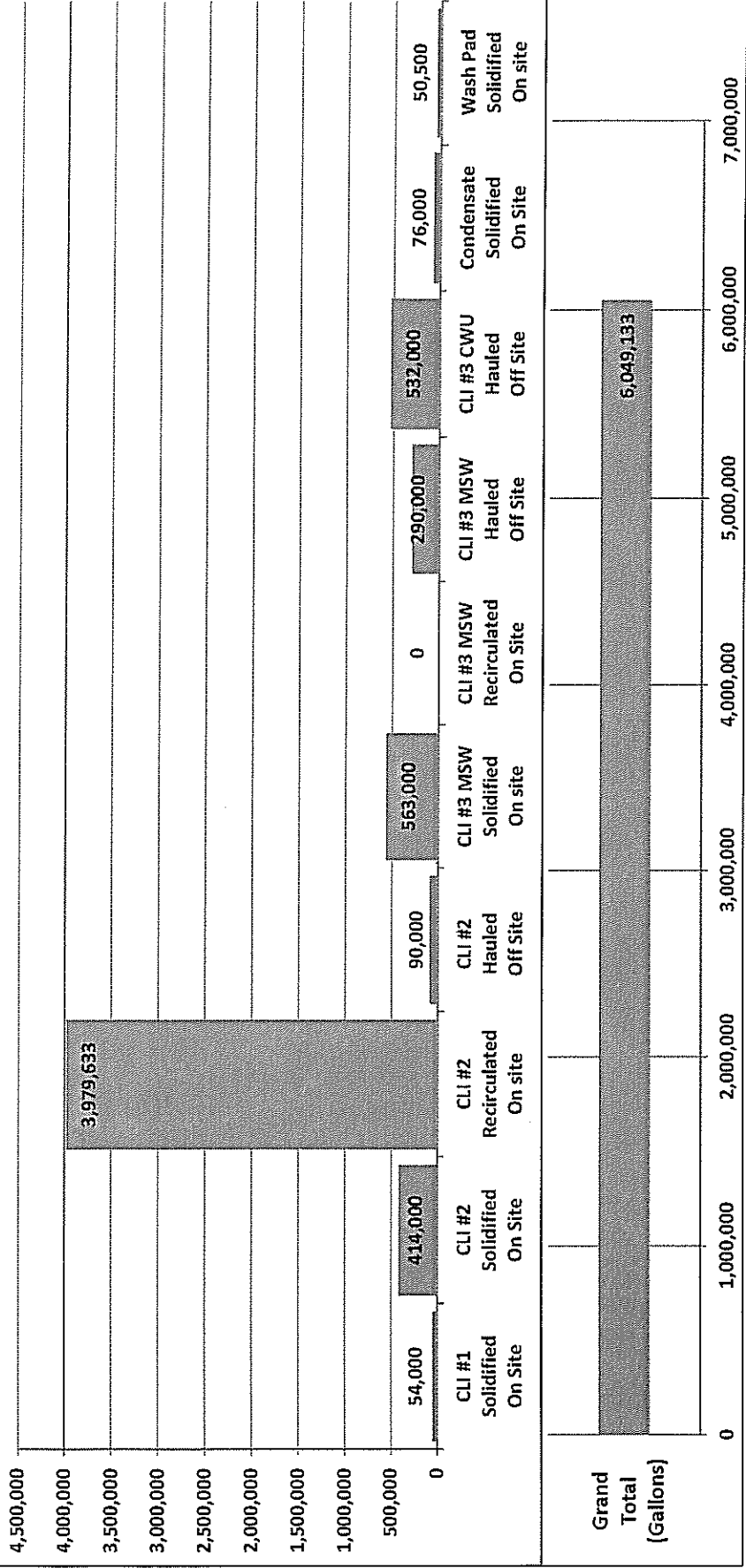


TABLE 2
Clinton Landfill No. 3
Summary of Exceeding Parameters from 4th Quarter 2014 That Were Addressed in
Previous Applications

Well	Parameter	Units	Initial Result	Interwell AGQS/MAPC	Intrawell AGQS	Addressed in Application Log No.
ROXANA SILT/ROBEIN MEMBER WELLS						
G27R	Solids - total dissolved solids (TDS)	mg/L	1500	1064	NE	2015-025
G27R	Sulfate, Dissolved	mg/L	800	286	NE	2015-025
G49R	Arsenic, Dissolved	µg/L	18	11	NE	2015-025
G49R	Solids - total dissolved solids (TDS)	mg/L	1200	1064	1328 ⁺	2015-025
R16R	Arsenic, Dissolved	µg/L	16	11	54 ^{**}	2014-491
UPPER RADNOR TILL SAND WELLS						
G49S	Chloride, Dissolved	mg/L	16	8.5	23.96 ⁺	2015-025
G49S	Solids - total dissolved solids (TDS)	mg/L	900	692.7	1576 ⁺	2015-025
G49S	Sulfate, Dissolved	mg/L	390	8.4	523 ⁺	2015-025
LOWER RADNOR TILL SAND WELLS						
G01M [#]	Sulfate, Dissolved	mg/L	160	65 ⁺	268.2 ⁺	2015-025
G49M	Magnesium, Dissolved	mg/L	96	82.2	114.2 ⁺	2015-025
G49M	Solids - total dissolved solids (TDS)	mg/L	1100	870	1100 ^{**}	2014-491
G49M	Sulfate, Dissolved	mg/L	380	65	456.5 ⁺	2015-025
ORGANIC SOILS WELLS						
G09D	Sulfate, Dissolved	mg/L	120	76	351.5 ⁺	2015-025
G48D	Sulfate, Dissolved	mg/L	130	76	291.8 ⁺	2015-025

Notes:

1. [#]Upgradient Well
2. AGQS: Applicable Groundwater Quality Standard/MAPC: Maximum Allowable Predicted Concentration
3. dissolved = filtered sample, total = unfiltered sample
4. mg/L = Milligrams per liter = parts per million (ppm), µg/L = Micrograms per liter = parts per billion (ppb), µmhos/cm = micromhos/centimeter, s.u. = standard units.
5. NE = Not Established
6. <= Not detected above the method detection limit
7. *Indicates the IEPA Log Number for the significant permit modification application in which the exceeding parameter has been addressed.
8. **Intrawell AGQS values proposed in pending Application Log No. 2014-491
9. ⁺ Intrawell AGQS values proposed in an addendum to Application Log No. 2015-025.

TABLE 1 (cont'd)
Clinton Landfill No. 3
Summary of Confirmation Sample Results – 4th Quarter 2014 (cont'd)

Well	Parameter	Units	Initial Result	Interwell AGQS/MAPC	Resample Result
ORGANIC SOILS WELLS					
G01D [#]	Specific Conductance, Field Measured	µmhos/cm	2900	1383	990
G02D [#]	Nitrate-N, Dissolved	mg/L	12	1.5	1.2
G03D [#]	Nitrate-N, Dissolved	mg/L	16	1.5	15
G06D [#]	Nitrate-N, Dissolved	mg/L	11	1.5	14
G07D [#]	Nitrate-N, Dissolved	mg/L	3	1.5	3.6
G08D [#]	Nitrate-N, Dissolved	mg/L	12	1.5	4.3
G09D	Nitrate-N, Dissolved	mg/L	11	1.5	8.2
G09D	Specific Conductance, Field Measured	µmhos/cm	1560	1383	1030
G09D	Zinc, Dissolved	mg/L	25	16	9.7
G16D	Magnesium, Dissolved	mg/L	76	73	61
G24D	Nitrate-N, Dissolved	mg/L	5.1	1.5	9.2
G39D	Nitrate-N, Dissolved	mg/L	2.4	1.5	<0.02
G40D	Nitrate-N, Dissolved	mg/L	2.3	1.5	3.2
G59D	Magnesium, Dissolved	mg/L	88	73	43
G59D	Sulfate, Dissolved	mg/L	430	76	40
R17D	Nitrate-N, Dissolved	mg/L	6.5	1.5	12

Notes:

1. [#]Upgradient Well
2. AGQS: Applicable Groundwater Quality Standard/MAPC: Maximum Allowable Predicted Concentration
3. dissolved = filtered sample, total = unfiltered sample
4. mg/L = Milligrams per liter = parts per million (ppm), µg/L = Micrograms per liter = parts per billion (ppb), µmhos/cm = micromhos/centimeter, s.u. = standard units.
5. NE = Not Established; NS = Not Sampled (well abandoned)
6. <= Not detected above the laboratory reporting limit
7. Sample results displayed in **BOLD** exceeded the established interwell AGQS/MAPC value.

TABLE 1 (cont'd)
Clinton Landfill No. 3
Summary of Confirmation Sample Results – 4th Quarter 2014 (cont'd)

Well	Parameter	Units	Initial Result	Interwell AGOS/MARC	Resample Result
LOWER RADNOR TILL SAND WELLS					
G01M [#]	Nitrate-N, Dissolved	mg/L	12	0.14	13
G04M [#]	Nitrate-N, Dissolved	mg/L	7.1	0.14	4.9
G04M [#]	Phenolics	µg/L	38	5	<5
G05M [#]	Nitrate-N, Dissolved	mg/L	5.7	0.14	3.6
G08M [#]	Nitrate-N, Dissolved	mg/L	13	0.14	9.2
G16M	Arsenic, Dissolved	mg/L	490	346	370
G16M	Nitrate-N, Dissolved	mg/L	18	0.14	21
G24M	Nitrate-N, Dissolved	mg/L	16	0.14	29
G31M	Nitrate-N, Dissolved	mg/L	22	0.14	22
G39M	Nitrate-N, Dissolved	mg/L	2.9	0.14	0.21
G40M	Nitrate-N, Dissolved	mg/L	10	0.14	11
G47M	Boron, Dissolved	µg/L	690	622	660
G47M	Nitrate-N, Dissolved	mg/L	23	0.14	23
G48M	Nitrate-N, Dissolved	mg/L	0.59	0.14	5.4
G48M	Sulfate, Dissolved	mg/L	130	65	36
G49M	Nitrate-N, Dissolved	mg/L	1	0.14	0.99
G58M	Nitrate-N, Dissolved	mg/L	3.1	0.14	<0.02

TABLE 1
Clinton Landfill No. 3
Summary of Confirmation Sample Results – 4th Quarter 2014

Well	Parameter	Units	Initial Result	Interwell AGOS/MAPC	Resample Result
ROXANA SILT/ROBEIN MEMBER WELLS					
G02R [#]	Nitrate-N, Dissolved	mg/L	18	0.06	<0.02
G04R [#]	Nitrate-N, Dissolved	mg/L	0.18	0.06	17
G08R	Nitrate-N, Dissolved	mg/L	4.9	0.06	6.3
G09R	Nitrate-N, Dissolved	mg/L	0.35	0.06	5.5
G25R	Nitrate-N, Dissolved	mg/L	0.08	0.06	<0.02
G27R	Nitrate-N, Dissolved	mg/L	1.4	0.06	0.18
G31R	Nitrate-N, Dissolved	mg/L	7.2	0.06	8
G39R	Nitrate-N, Dissolved	mg/L	3.7	0.06	5.9
G40R	Zinc, Dissolved ¹	mg/L	30	20	9.1
G47R	Nitrate-N, Dissolved	mg/L	0.27	0.06	18
G49R	Nitrate-N, Dissolved	mg/L	0.19	0.06	0.08
G49R	Specific Conductance	µmhos/cm	1610	1281	1040
G49R	Sulfate, Dissolved	mg/L	350	286	380
G58R [#]	Nitrate-N, Dissolved	mg/L	0.33	0.06	<0.02
R17R	Nitrate-N, Dissolved	mg/L	18	0.06	27
UPPER RADNOR TILL SAND WELLS					
G07S [#]	Nitrate-N, Dissolved	mg/L	2	0.29	0.88
G49S	Magnesium, Dissolved	mg/L	83	66.4	67
G49S	Nitrate-N, Dissolved	mg/L	0.7	0.29	1.8
G50S	Specific Conductance, Field Measured	mg/L	1150	1108.7	1013
G54S	Nitrate-N, Dissolved	mg/L	0.69	0.29	0.2

¹ A typographical error in the February 19, 2015 initial notification letter mislabeled this parameter as dissolved nitrate.

As discussed in the initial notification letter, three apparent parameter exceedances which were identified in the 4th quarter 2014 were observed at concentrations that were generally consistent with or lower than concentrations which were previously identified and confirmed as exceedances. The 4th quarter 2014 exceeding parameters listed in Table 2 were previously addressed in significant permit modification applications (Log Nos. 2014-491 and 2015-025) which demonstrated that parameter exceedances observed during the 2nd quarter 2014 and 3rd quarter 2014 sampling events, respectively, were not attributable to a release from the Facility. These applications are currently under review. As these parameters had been previously confirmed as exceedances and addressed in applications that were pending at the time the initial notification letter was submitted, no additional sampling was conducted for the parameters listed in Table 2 (as indicated in Table 1 of the initial notification letter).

Additionally, Table 2 lists some parameters for which confirmed exceedances were addressed in previously approved applications, but for which new intrawell AGQS values are yet to be approved. The new intrawell AGQS values were submitted as an addendum to Application Log No. 2015-025. Pending approval of these values, these parameters will not be addressed in any additional applications.

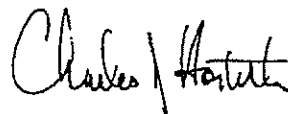
Resample results did not confirm the remaining apparent exceedances, as summarized in the attached Table 1. Therefore, CLI will continue routine detection monitoring for those parameters.

Please contact the undersigned if you have any questions or need additional information.

Sincerely,
PDC Technical Services, Inc.



Rachel L. Carlson, E.I.T.
Staff Engineer
(309) 495-1571
rcarlson@pdcare.com



Charles J. Hostetler, Ph.D.
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cc: Ron Welk/Jenny Hinton
David Bryant
File

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PDC Technical Services, Inc.

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PDC Project No. 91-0118.13

April 10, 2015

Illinois Environmental Protection Agency
Permit Section
Bureau of Land -- #33
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794 - 9276

**RE: 0390055036--DeWitt County
Clinton Landfill No. 3
Permit No. 2005-070-LF
Modification No. 50
Section VIII. Groundwater Monitoring
Special Condition 14**

Dear Sir or Madam:

On behalf of Clinton Landfill, Inc. (CLI), PDC Technical Services, Inc. (PDC) is submitting the results of the confirmation procedures (resamples) for the January 15, 2015 reporting period at the Clinton Landfill No. 3 (Facility), in accordance with the above-referenced permit condition. CLI notified the Agency of the initial 4th quarter 2014 exceedances and intent to conduct confirmation sampling for selected parameters in a correspondence dated February 19, 2015 (initial notification letter). Table 1 is attached to summarize the confirmation sampling results.

As summarized in Table 1, resample results confirmed a number of apparent exceedances. Pursuant to Special Condition VIII.15 of the Facility permit, CLI will submit a significant permit modification application in order to demonstrate that these confirmed exceedances from the 4th quarter 2014 are attributable to a source other than the Facility.

As also discussed in the initial notification letter, PDC Laboratories, Inc. (PDC Labs) is currently investigating potential alternate sources of dissolved nitrate in the groundwater samples, which may include sampling and/or laboratory artifacts. Therefore, CLI followed the confirmation procedures of 35 IAC 811.319(a)(4)(B) for all 4th quarter 2014 apparent exceedances of dissolved nitrate, although we note that the initial dissolved nitrate results for many wells were consistent with dissolved nitrate levels that had previously been demonstrated to not be attributed to the Facility in recently approved applications and/or pending applications Log No. 2014-491 and Log No. 2015-025. CLI will also further address any confirmed dissolved nitrate exceedances (as listed in Table 1) in the significant modification that will be submitted to address 4th quarter 2014 exceedances.

RECEIVED

APR 13 2015

Our Work: Here to serve.

Our Promise: Here to protect.

Our Future: Here to provide.

PERMIT SECTION



Illinois Environmental Protection Agency

Bureau of Land • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

SOLID WASTE LANDFILL GROUNDWATER, LEACHATE, FACILITY AND GAS REPORTING FORM

This form must be used as a cover for the following list of notices and reports required to be submitted to the Illinois EPA's Bureau of Land, Permit Section. This form must be used for Solid Waste facilities only. Reporting for Hazardous Waste facilities should be submitted on a separate form. All reports submitted to the Illinois EPA's Bureau of Land Permit Section must contain an original, plus a minimum of two copies.

Note: This form is not to be used with permit applications. The facility's approved permit will state whether the document you are submitting is required as a report or an application.

Facility Name: Clinton Landfill No. 3 Site ID #: 0390055036
Facility Address: 9550 Heritage Rd, Clinton, IL 61727

Check the appropriate heading. Only one heading may be checked for each corresponding submittal. Check the appropriate sub-heading, where applicable. Attach the original and all copies behind this form.

LPC-160 Forms

Groundwater

Leachate

Quarterly - Enter 1, 2, 3, or 4

Quarterly - Enter 1, 2, 3, or 4

Semi-Annual

Semi-Annual

Annual

Annual

Biennial

Biennial

Well Construction Information

Well Construction Forms, Boring Logs and/or Abandonment Forms

Well Survey Data (e.g., Stick-up Elevation Data)

Annual Groundwater Flow Evaluation

Notice of Observed Increase in Groundwater

Notice of Intent to Perform Confirmation Procedures (Re-sampling) in Groundwater

Notice of Confirmed Increase of Groundwater Exceedence from Re-sample

Notice of Methane Exceedences

Annual Facility Report (per 35 Ill. Adm. Code 813.504) and Gas Monitoring Report

Annual Certifications per 35 Ill. Adm. Code 813.501

Other (identify)

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APR 13 2015

IEPA-BOL
PERMIT SECTION

MEMORANDUM

Date 4/13/2015
To: BOL File Room
From: Pamela Ketchum
Re: LPC# 0390055036 - DeWitt County
Clinton Landfill No. 3
Groundwater

IGRA-DIVISION OF RECORDS MANAGEMENT
RELEASABLE

APR 30 2015

REVIEWER: JKS

The Notice of Confirmed Increase of GW Exceedence from Re-sample for the above referenced facility was dated 4/10/2015 and was received by the Agency on 4/13/2015. A copy is attached.

cc: Champaign Regional Office -



Imagery Date: 3/31/2015

40°06'43.35" N 88°56'59.04" W elev: 707 ft

Google

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Eyeball 5774 ft