

November 16, 2018

Mahomet Aquifer Protection Task Force, c/o
Ms. Barb Lieberoff
Office of Community Relations
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, IL 62702

Dear Mahomet Aquifer Protection Task Force Members:

DeWitt County firmly supports the work of the Mahomet Aquifer Protection Task Force (MAPTF). We have been following the reports of DeWitt County's representative, Ms. Teresa Barnett (Director of Government Affairs, DeWitt County Emergency Management Agency, retired) with particular interest, and have been pleased with the Task Force's commitment to producing a robust set of recommendations to guard against threats to the Mahomet Aquifer water supply. Ms. Barnett has reported on two issues that are under consideration by the MAPTF that DeWitt County wishes to address.

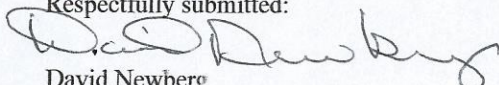
The first issue is whether active landfills with compliant groundwater monitoring programs need additional site characterization. Ms. Barnett is particularly concerned about the addition of new recommendations (this particular recommendation arose shortly following the October meeting) at this stage in the process. In her view, with which we concur, active landfills have not been identified as known threats to the Mahomet Aquifer, and that focusing additional attention on sites that are currently regulated and monitored by the Illinois Environmental Protection Agency is a misallocation of resources. Further, we point out that DeWitt County, with the assistance of its environmental consultant Envirogen, has fully reviewed the site characterization data for the Mahomet Aquifer beneath the Clinton Landfill during the local siting and permitting review processes; that there has been a comprehensive three-year long groundwater split-sampling investigation of the site; and that the United States Geological Survey has concluded that the Mahomet Aquifer is not hydraulically connected to the surface water system in DeWitt County.

Our view is that characterization efforts should be focused on potential recharge areas or areas with known groundwater contamination.

I understand that another new recommendation has been made to change the Illinois laws governing the local siting of landfills with respect to MGP and PCB wastes. We should not support any such recommendation as DeWitt County has an existing landfill siting ordinance and has already ensured that no such wastes may be managed at Clinton Landfill. First, Article 39 (PCB Remediation Waste) and Article 40 (MGP Source Material) under the Third Amendment to the Host Agreement between DeWitt County and Clinton Landfill prohibit Clinton Landfill from accepting these waste streams for disposal at its facility. In addition, Clinton Landfill has committed under the Consent Order with the Illinois Attorney General and a number of central Illinois municipalities to "not accept for disposal, apply for permits or authority to dispose, or file or seek to obtain local siting approval pursuant to Section 39.2 of the Act from the DeWitt County Board (or from the governing body of a municipality if in an incorporated area in the future) for the disposal of TSCA-PCBs or MGP Source Material on any real estate that is located over the Sole Source Aquifer in DeWitt County, Illinois, at any time." As a result, a change to the siting statute when it comes to the acceptance of PCB and MGP waste at the Clinton Landfill is not necessary.

You have all worked hard on this effort this year and DeWitt County appreciates your service.

Respectfully submitted:



David Newberg
Chairman, DeWitt County Board