

Tazewell County Board



David Zimmerman, Chairman of the Board
Wendy K. Ferrill, County Administrator

November 15, 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 Fellow Members of the Mahomet Aquifer Protection Task Force:

As a member of the Mahomet Aquifer Protection Task Force, and as the Tazewell County Board Chairman for the past 10 years, I wish to take this opportunity to express my views on two issues that are under consideration for inclusion in the upcoming report to the General Assembly and Governor.

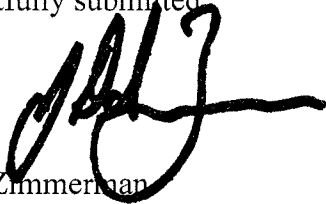
The first issue is whether active, permitted, and compliant landfills should be the focus of additional site characterization efforts. I wish to point out that Tazewell County (and its environmental consulting firm Patrick Engineering based out of Springfield, Illinois) have reviewed the site characterization data for the Mahomet Aquifer beneath the Indian Creek Landfill #2 Facility during the local siting and permitting review processes. There has also been a costly and extensive groundwater split-sampling investigation of the site focusing on the Mahomet Aquifer conducted over the last three years. In addition, the Tazewell County Health Department conducts frequent, unannounced inspections of the facility to ensure that the groundwater monitoring network is maintained and operated according to permit requirements. In light of these intensive efforts, our view is that further characterization focused on the Mahomet Aquifer in the vicinity of Indian Creek Landfill #2 would be an unwarranted waste of resources that would duplicate efforts that are being satisfactorily handled at the local level.

Another recent suggestion is the possibility of revising the current Illinois landfill siting statute to include restrictions or prohibitions for the disposal of PCB and MGP wastes, which would affect the landfill siting authority given Tazewell County by the existing statute. Generally, we should not support such revisions that affect existing local government authority or ordinances. Specifically, with respect to PCB and MGP wastes, Tazewell County already has the necessary safeguards in place. For MGP wastes, this authority is provided in Article 5 of the Host Agreement between Tazewell County and Indian Creek Landfill, which specifically prohibits the acceptance of hazardous waste. MGP source wastes must be managed at a hazardous waste landfill under Illinois law. Therefore, Indian Creek Landfill is already prohibited from accepting MGP source wastes. Article 32 of that same Host Agreement establishes a Review Committee, representing Tazewell County and three nearby municipalities (i.e., Hopedale, Tremont

and Delevan), which reviews any special waste that Indian Creek Landfill desires to accept. PCB wastes must be managed as a special waste in Illinois, and therefore, are subject to review by the Review Committee. The Review Committee may approve or disapprove of the landfill's request to accept a special waste, solely at its discretion. This procedure was utilized in 2012 for a PCB waste stream generated by Caterpillar's East Peoria Facility that was ultimately approved by the Review Committee and the Tazewell restrictions and prohibitions, there is no need to change the siting law. Issues such as these are best handled at the local level.

Tazewell County has long appreciated the importance of the Mahomet Aquifer as it relates to the health and economic well-being of our citizens and neighbors. Again, I thank each of you for your efforts on this Task Force, and look forward to our discussions of these issues as we move forward to achieving consensus and approving the Final Report.

Respectfully submitted:

A handwritten signature in black ink, appearing to read 'D. Zimmerman', written over a horizontal line.

David Zimmerman
Tazewell County Board Chairman