## **ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**



 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829

 Pat Quinn, Governor
 Lisa Bonnett, Director

Voice: (217) 278-5800 FAX: (217) 278-5808

September 11, 2013

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 August 29, 2013, 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.

No violations were noted at the time of this inspection. For your information, a copy of the inspection report is enclosed.

Rlease contact Dustin Burger at (217) 278-5800 if you have any questions regarding this inspection.

Sincèrely,

Paul M. Purseglove, Manager Field Operations Section Bureau of Land

Enclosure

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

County:	DeWitt		L	PC#:	0390055	5036	Re	gion: 4	- Champaigr	ı	
Location/S	Site Name:	Clinton/	Clinton	Landfill	#3						
Date:	08/29/2013	Time:	From	10:50A	. То	11:30A	Previous Inspecti	on Date:	06/10/2013		
Inspector(s): Dustin Burger						Weather:	Weather: Overcast, dry, 80s				
No. of Pho	otos Taken: #	9				,	Samples Taken:	Yes #	No [	$\triangleleft$	
Interviewe	d: Kyle Ma	irtin, Env	/ironme	ntal Con	npliance	—					
Permitted	Owner Mailin	g Addre	ss			Permitt	ed Operator Mailin	g Address	;		
Clinton Landfill 3 4700 Sterling Ave. P.O. Box 9071 Peoria, IL 61612-9071					Clinton Landfill 3 9550 Heritage Road-C Clinton, IL 61727						
Chief Ope	rator Mailing	Address				Certified Operator Mailing Address					
Ron Welk 4700 Sterling Ave. P.O. Box 9071 Peoria, IL 616-9071							elk terling Ave. P.O. B IL 616-9071	ox 9071			
AUTHORIZATION:OPERATIONAL STATSignificant Modification PermitOperatingInitial:2005-070-LFLatestMod 39 Exp. 2/15/17Closed-Date Certified:					∙ <b>∪s:</b> ⊠	TYPE OF C Existing Landfill	ls 814 814	<b>DN:</b> -Subpart C -Subpart D -Putres./Che	□ m. ⊠		
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	SECTION	DESCRIPTION	
	ILLINO	IS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS	
1.	9(a)	CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS	
2.	9(c)	CAUSE OR ALLOW OPEN BURNING	
3.	12(a)	CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLINOIS	
4.	12(d)	CREATE A WATER POLLUTION HAZARD	
5.	12(f)	CAUSE, THREATEN OR ALLOW DISCHARGE WITHOUT OR IN VIOLATION OF AN NPDES PERMIT	
6.	21(a)	CAUSE OR ALLOW OPEN DUMPING	
7.	21(d)	CONDUCT ANY WASTE-STORAGE, WASTE-TREATMENT, OR WASTE- DIS OPERATION:	SPOSAL
	(1)	Without a Permit or in Violation of Any Conditions of a Permit (See Permit Provisions)	
-	(2)	In Violation of Any Regulations or Standards Adopted by the Board	
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	
9.	21(f)(1)	CONDUCT ANY HAZARDOUS WASTE-STORAGE, TREATMENT OR DISPOSAL OPERATION WITHOUT A RCRA PERMIT.	

### LPC #: 0390055036 Inspection Date: Agusut 29, 2013

0.	21(0)	CONDUCT A SANITARY LANDFILL OPERATION WHICH RESULTS IN ANY FOLLOWING CONDITIONS:	
	(1)	Refuse in Standing or Flowing Water	
	(2)	Leachate Flows Entering Waters of the State	
	(3)	Leachate Flows Exiting the Landfill Confines	
	(4)	Open Burning of Refuse in Violation of Section 9 of the Act	
	(5)	Uncovered Refuse Remaining From Any Previous Operating Day or at the Conclusion of Any Operating Day	
	(6)	Failure to Provide Final Cover Within Time Limits	
	(7)	Acceptance of Wastes Without Necessary Permits	
	(8)	Scavenging as Defined by Board Regulations	
	(9)	Deposition of Refuse in Any Unpermitted Portion of the Landfill	
	(10)	Acceptance of Special Waste Without a Required Manifest	
	(11)	Failure to Submit Reports Required by Permits or Board Regulations	
	(12)	Failure to Collect and Contain Litter by the End of each Operating Day	
	(12)	Failure to Submit Any Cost Estimate, Performance Bond or Other Security	
11.	21(t)	CAUSE OR ALLOW A LATERAL EXPANSION OF A MUNICIPAL SOLID WASTE LANDFILL (MSWLF) UNIT WITHOUT A PERMIT	
12.	21.6(b)	ACCEPTANCE OF LIQUID USED OIL FOR FINAL DISPOSAL (EFFECTIVE JULY 1, 1996)	
13.	22.01	FAILURE TO SUBMIT ANNUAL NONHAZARDOUS SPECIAL WASTE	
	00.47	LANDFILL POST-CLOSURE CARE	
14.	22.17	Failure to Monitor Gas, Water, Settling	
	(a) (b)	Failure to Take Remedial Action	
		ACCEPTANCE OF LANDSCAPE WASTE FOR FINAL DISPOSAL	
15.	22.22(c)	CAUSE OR ALLOW THE DISPOSAL OF ANY LEAD-ACID BATTERY	
<u>16.</u> 17.	22.23(f)(2) 22.28(b)	ACCEPTANCE OF WHITE GOODS FOR FINAL DISPOSAL	
		ACCEPTANCE OF ANY USED OR WASTE TIRE FOR FINAL DISPOSAL (UNLESS LANDFILL MEETS EXEMPTION OF 55(b)(1))	
18.	55(b)(1)	CAUSE OR ALLOW THE DISPOSAL OF ANY POTENTIALLY	
19.	56.1(a)		
	SOLID	WASTE SITE OPERATOR CERTIFICATION LAW REQUIREMENTS	<u></u>
20.	225 ILCS 230/1004	CAUSING OF ALLOWING OPERATION OF A LANDFILL WITHOUT PROPER COMPETENCY CERTIFICATE	
		35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G	
		PRIOR CONDUCT CERTIFICATION REQUIREMENTS	
21.	745.181	CHIEF OPERATOR REQUIREMENTS	
22.	745.201	PRIOR CONDUCT CERTIFICATION PROHIBITIONS	
		SPECIAL WASTE HAULING REQUIREMENTS	
	809.301	REQUIREMENTS FOR DELIVERY OF SPECIAL WASTE TO HAULERS	

LPC #: 0390055036 Inspection Date: Agusut 29, 2013

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

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

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40.	811.312	LANDFILL GAS PROCESS AND DISPOSAL SYSTEM	
	(c)	No Unpermitted Gas Discharge Gas Flow Rate Measurements into Treatment of Combustion Device	
	(d)		
	(e)	Standards for Gas Flares	
	(f)	Standards for On-Site Combustion of Landfill Gas Using Devices Other Than Flares	
	(g)	Gas Transported Off-Site	
41.	811.313	INTERMEDIATE COVER	
	(a)	Requirements for the Application for Intermediate Cover	
	(b)	Runoff and Infiltration Control	
	(C)	Maintenance of Intermediate Cover	
42.	811.314	FINAL COVER SYSTEM (DOES NOT APPLY TO PART 814 SITES THAT HAY CLOSED, COVERED AND VEGETATED PRIOR TO SEPTEMBER 18, 1990)	VE
	(a)	General Requirements	
	(b)	Standards for Low Permeability Layer	
	(c)	Standards for Final Protective Layer	
43.	811.316	PLUGGING AND SEALING OF DRILL HOLES	
44.	811.321	WASTE PLACEMENT	
	(a)	Phasing of Operations	
	(b)	Initial Waste Placement	
45.	811.322	FINAL SLOPE AND STABILIZATION	
	(a)	Grade Capable of Supporting Vegetation and Minimizing Erosion	
	(b)	Slopes Required to Drain	
	(c)	Vegetation	
	(d)	Structures Built over the Unit	
46.	811.323	LOAD CHECKING PROGRAM	
	(a)	Load Checking Program Implemented	
	(b)	Load Checking Program for PCB's at MSWLF Units	
	(c)	Load Checking Program Components	
	(d)	Handling Regulated Hazardous Wastes	
	PART 811 SUBPART D	MANAGEMENT OF SPECIAL WASTES AT LANDFILLS	
47.	811.402	NOTICE TO GENERATORS AND TRANSPORTERS	
48.	811.403	SPECIAL WASTE MANIFESTS REQUIREMENTS	
49.	811.404	IDENTIFICATION RECORD	<b></b>
	(a)	Special Waste Profile Identification Sheet	
	(b)	Special Waste Recertification	
50.	811.405	RECORDKEEPING REQUIREMENTS	
51.	811.406	PROCEDURES FOR EXCLUDING REGULATED HAZARDOUS WASTES	
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	PART 811 SUBPART G		
52.	811.700	COMPLY WITH FINANCIAL ASSURANCE REQUIREMENTS OF PART 811, SUBPART G	
53.	811.701	UPGRADING FINANCIAL ASSURANCE	
54.	811.704	CLOSURE AND POST-CLOSURE CARE COST ESTIMATES	
55.	811.705	REVISION OF COST ESTIMATE	
		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	
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	
<u> </u>		OTHER REQUIREMENTS	
58.	OTHER:	APPARENT VIOLATION OF: ( ) PCB; ( ) CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	
59.			
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#### Informational Notes

- 1. [Illinois] Environmental Protection Act: 415 ILCS 5/4.
- 2. Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
- 3. 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.
- 4. 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.
- 5. 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).
- 6. Items marked with an "NE" were not evaluated at the time of this inspection.

### LPC #: 0390055036 Inspection Date: Agusut 29, 2013

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	PERMIT PROVISIONS
PERMIT NUMBER	<b>DESCRIPTION OF VIOLATION</b> (condition # of permit, page # of permit, and/or page # of approved application)
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#### **REQUEST MEMORANDUM**

- **DATE:** August 19, 2013
- TO: Dustin Burger, Champaign Regional Office
- FROM: Imran Syed
- SUBJECT: 0390055036 DeWitt County Clinton Landfill 3 Permit File

#### PURPOSE: To Request a Site Inspection to Verify Claims made in application Log No. 2013-384

1. APPLICATION TYPE: Construction Acceptance Report for liner and leachate collection system in Phase 5A and 5A3.

#### 2. SPECIFIC STRUCTURES/SYSTEMS INVOLVED:

- Removal of rain flap
- Placement of drainage layer and filter geotextile in 5A3
- Placement of protective soil layer in 5A2
- Connecting the leachate collection pipe.
- APPLICATION(S) CONTAINING SUBJECT DESIGNS/PLANS & ASSOCIATED PERMIT(S): Permit No. 2005-070-LF and application Log Nos. 2013-009 (approved in Modification No. 39) and Log No. 2013-384.
- 4. DATES:

Application Received by Illinois EPA:August 9, 2013Current Due Date for Final Action:November 7, 2013Requested Date for Response Memo:September 20, 2013

- 5. ADDITIONAL COMMENTS BY PERMIT REVIEWER: If you have any questions please let me know.
- cc:

#### **RESPONSE MEMORANDUM**

- DATE: September 9, 2013
- TO: Imran Syed
- FROM: Dustin Burger
- PURPOSE: To Respond to Permit Section's Request for a Site Inspection
- 1. DATE OF INSPECTION: 8/30/2013
- 2. DO THE CLAIMS MADE IN APPLICATION APPEAR TO BE ACCURATE? Yes
- ADDITIONAL COMMENTS BY INSPECTOR: See attached Inspection report
  - cc: Dustin Burger

## Illinois Environmental Protection Agency

Bureau of Land + Field Operations Section + Champaign

LPC#0390055036—DeWitt County Clinton/Clinton Landfill #3 FOS File August 29, 2013 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 August 29, 2013. 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, was in a meeting in Peoria for the day so Kyle Martin, the Compliance Manager, accompanied me during the visit. Nine photos were taken of Unit #3. The weather was cloudy and very dry, with temperatures in the 80s. The weather for the last month had been extremely dry, with little or no rainfall.

### Site Inspection

When I arrived at the landfill I asked for Dave Bryant, the landfill manager, at the office. Mr. Bryant was out of the office at a meeting at the corporate headquarters, so Kyle, the Compliance Manager, escorted me on our visit. We met at the scalehouse and spoke to Mike. Waste profile sheets and manifests are kept in the scalehouse office, so I asked to see the waste analyses for the Manufactured Gas Plant (MGP) from the Rockford CommEd project that the landfill was currently accepting. Mike found the file and I looked through the data. Sample analysis results indicated the wastes were not hazardous for any characteristic of hazardous waste, but the material was not tested for the toxicity characteristic since the waste is exempted from being hazardous for toxicity by Ill. Adm. Code Section 721.124(a).

While at the scalehouse, I also asked for disposal records for the Landers site. Mr. Landers has been allocated some space at Clinton Landfill to clean up his junkyard site north of Clinton. The disposal costs were the responsibility of Clinton Landfill due to a settlement in a previous enforcement case. Landers brought in a load amounting to 2.13 tons on March 13, 2013. This is the only load on record.

After the visit to the scalehouse, we drove to the active area located in cell 5A. A watering truck was busy watering the road to keep down dust from the near-drought-like conditions that have been the norm for the past month. I watched as several trucks unloaded (photos 1-2). The winds were calm today, so blowing litter was not an issue. Bulldozers would push the waste to the active area, and compactor would run over the

waste to compact the material. The landfill was using a very small active area footprint. A smaller active face means waste is tracked over a smaller area and less cover material is needed to cover the waste each night. No semi-trailers were present during our visit, so the truck tipper located in separate active area in cell 3A was not being used. No banned wastes, such as tires, electronic devices, used oil, or landscape wastes were observed.

Construction of cell 5A is now complete. The facility received permission to begin using Cell 5A1 on May 10, 2013 in Permit Modification 39. The facility has now filled the floor of Cell 5A1, and had sent in a request to begin operating in Cell 5A3 as Permit Log 2013-384. The cell had been excavated and the recompacted clay liner, HDPE liners, and leachate collection system installed when the western portion and sidewall liners were installed. The facility did not want to begin operating in 5A1 when the rest of the cell was constructed, although the liner system had been installed. The rain flap was removed separating the portions of Cell 5A3 from the rest of the cell, the leachate lines connected, and the drainage layer and felt-like geotextile cover installed. Pending review of the Construction Quality Assurance (CQA) report by BOL/Permits Section, the Cell5A3 is ready to accept waste (photos 3-4)

The Chemical Waste Unit (CWU) was receiving waste from a Manufactured Gas Plant (MGP) site in Rockford intermittently. I took three photos of the CWU (photos 5-7). Disposal records indicated only 10 loads had been received in the last month.

Thus far no waste has been placed in the eastern half of the CWU, but a soil and cover has been placed to protect the liner from freezing and UV damage. The landfill has received a permit allowing, and is now using a plastic covering over the areas not used to keep stormwater from contacting the waste or entering the leachate collection system. The stormwater would then not have to be handled as leachate. Currently the landfill is not solidifying the leachate from the CWU, finding it was taking up too much airspace. The leachate is instead hauled to Peoria Disposal Company (PDC) #1 for treatment in their wastewater treatment facility.

We next looked at the waste solidification area. The area was not active at the time of the inspection. While the landfill still produces leachate, the dry weather has slowed down leachate production.

We also looked at the citizen's disposal box used for small vehicles to unload to keep them away from the heavy machinery and the gas flare for Unit #3.

He only other activity of note is that the landfill was selling some of the excess soil removed during cell construction to be used as backfill in a construction project in Decatur. This soil was virgin soil and had not contacted any waste.

### 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

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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 39 issued on May 10, 2013 approved the Construction Quality Acceptance (CQA) report for Phase 5A1. Cell 5A1 consists of approximately 4.56 acres. The permit also modifies the closure/post closure care costs to reflect the opening of a new landfill cell. This is the last granted permit on file.

Total closure costs are estimated at the end of its operating life is \$11,931,943. The estimate for closure of the current landfill's 29 acres of municipal solid waste disposal and 6.14 acres comprising the CWU is \$9,892,394. This value includes \$4,201,519 for premature closure, and \$5,687,875 for post-closure care.

### **Records Review**

The facility has 60 groundwater monitoring wells installed. Fifteen upgradient and 45 downgradient wells monitor the four groundwater zones beneath the landfill. No new groundwater information was available on the Agency's digitally imaged file system since my last inspection.

The landfill disposes of leachate in one of three ways. First, the liquids can be recirculated. Unit #3 does not yet have a recirculation systems installed. Second, leachate and landfill gas condensate can be solidified with ash and disposed as solid waste. Thirdly, leachate can be hauled off site for disposal. MSW leachate is hauled to Bloomington-Normal Water Reclamation District, while the CWU leachate is manifested to Peoria Disposal Company's PDC #1 wastewater plant where it is pre-treated and discharged to the Peoria Sanitary District.

#### **Summary of Apparent Violations**

No violations were noted during the inspection





# DIGITAL PHOTOGRAPHS

LPC #0390055036–DeWitt County Clinton/Clinton Landfill #3 FOS File

DATE August 29, 2013 TIME 10:50AM-11:30AM DIRECTION: South PHOTO by: Dustin Burger PHOTO FILE NAME: 0390055036~08292013-001.jpg COMMENTS: Active area



DATE: August 29, 2013 TIME: 10:50AM-11:30AM DIRECTION: South PHOTO by: Dustin Burger PHOTO FILENAME: 0390055036~08292013-002.jpg COMMENTS: Active area





## DIGITAL PHOTOGRAPHS

LPC #0390055036–DeWitt County Clinton/Clinton Landfill #3 FOS File

DATE: August 29, 2013 TIME 10:50AM-11:30AM DIRECTION: South PHOTO by: Dustin Burger PHOTO FILE NAME: 0390055036~08292013-003.jpg COMMENTS: New cell 5A2 and 5A3



DATE August 29, 2013 TIME 10:50AM-11:30AM DIRECTION: Northwest PHOTO by: Dustin Burger PHOTO FILENAME 0390055036~08292013-004.jpg COMMENTS: New cell





# DIGITAL PHOTOGRAPHS

LPC #0390055036–DeWitt County Clinton/Clinton Landfill #3 FOS File

DATE: August 29, 2013 TIME: 10:50AM-11:30AM DIRECTION: South PHOTO by: Dustin Burger PHOTO FILENAME 0390055036~08292013-005.jpg COMMENTS: CWU overview shot



DATE: August 29, 2013 TIME: 10:50AM-11:30AM DIRECTION: Southwest PHOTO by: Dustin Burger PHOTO FILENAME: 0390055036~08292013-006.jpg COMMENTS: CWU Active area





## DIGITAL PHOTOGRAPHS

LPC #0390055036-DeWitt County Clinton/Clinton Landfill #3 FOS File

DATE August 29, 2013 TIME: 10:50AM-11:30AM DIRECTION: South PHOTO by: Dustin Burger PHOTO FILENAME 0390055036~08292013-007.jpg COMMENTS: Unused CWU cell



DATE August 29, 2013 TIME 10:50AM-11:30AM DIRECTION: Northeast PHOTO by: Dustin Burger PHOTO FILENAME 0390055036~08292013-008.jpg COMMENTS: Truck tipper active area





# DIGITAL PHOTOGRAPHS

LPC #0390055036–DeWitt County Clinton/Clinton Landfill #3 FOS File

DATE: August 29, 2013 TIME: 10:50AM-11:30AM DIRECTION: East PHOTO by: Dustin Burger PHOTO FILE NAME 0390055036~08292013-009.jpg COMMENTS: Solidification area



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