### **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

January 15, 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 December 29, 2014 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.

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

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

County:	DeWitt	LPC#:	0390055	5036	Re	gion: 4	- Champaig	n
Location/Sit	e Name: Clinton/C	Clinton Landfill	#3					
Date:	12/29/2014 Time:	From 10:00	То	11:00	Previous Inspecti	on Date:	10/20/2014	
Inspector(s)	: Dustin Burger. Ki	urt Niebergall		Weather:	Mostly clear, wet,	30s		
No. of Photo	os Taken: # 11				Samples Taken:	Yes #	No	$\boxtimes$
Interviewed	: Kyle Martin, Com	pliance Mana	ger	Fa	cility Phone No.:	217/935	-8028	
Permitted C	Owner Mailing Addres	s		Permitte	ed Operator Mailin	g Address	3	
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 Operator Mailing Address				Certified Operator Mailing Address				
Ron Welk 4700 Sterling Ave. P.O. Box 9071 Peoria, IL 616-9071				Ron Welk 4700 Sterling Ave. P.O. Box 9071 Peoria, IL 616-9071				
Initial: 200	Modification Permit	OPERATION Operating Closed-Not C Closed-Date	Certified.		TYPE OF C Existing Landfill New Landfill	ls 814 814	<b>ON:</b> I-Subpart C I-Subpart D -Putres./Che	  em. ⊠

	SECTION	DESCRIPTION	VIOL			
	ILLINOIS 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.	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)				
	(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: December 29,2014

10.	21(0)	CONDUCT A SANITARY LANDFILL OPERATION WHICH RESULTS IN ANY FOLLOWING CONDITIONS:	OF THE
	(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	
1.000	(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	
	(13)	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 MODIFICATION	
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	
14.	22.17	LANDFILL POST-CLOSURE CARE	
	(a)	Failure to Monitor Gas, Water, Settling	
	(b)	Failure to Take Remedial Action	
15.	22.22(c)	ACCEPTANCE OF LANDSCAPE WASTE FOR FINAL DISPOSAL	
16.	22.23(f)(2)	CAUSE OR ALLOW THE DISPOSAL OF ANY LEAD-ACID BATTERY	
17.	22.28(b)	ACCEPTANCE OF WHITE GOODS FOR FINAL DISPOSAL	
18.	55(b)(1)	ACCEPTANCE OF ANY USED OR WASTE TIRE FOR FINAL DISPOSAL (UNLESS LANDFILL MEETS EXEMPTION OF 55(b)(1))	
19.	56.1(a)	CAUSE OR ALLOW THE DISPOSAL OF ANY POTENTIALLY INFECTIOUS MEDICAL WASTE	
	SOLID W	ASTE SITE OPERATOR CERTIFICATION LAW REQUIREMENTS	
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	
23.	809.301	REQUIREMENTS FOR DELIVERY OF SPECIAL WASTE TO HAULERS	

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\* LPC #: 0390055036

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Inspection Date: December 29,2014

24.	809.302(a)	REQUIREMENTS FOR ACCEPTANCE OF SPECIAL WASTE FROM HAULERS				
25.	809.501	MANIFESTS, RECORDS, ACCESS TO RECORDS, REPORTING REQUIREMENTS AND FORMS				
	(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				
	044.405					
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				
	(1)	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	
	(f)	Completion of Closure Activities at MSWLF Units	
	(g)	Deed Notation for MSWLF Units	
34.	811.111	POST-CLOSURE MAINTENANCE	
34.	(a)	Procedures After Receipt of Final Volume of Waste	
	(b)	Remove All Equipment of Structures	
	(c)	Maintenance and Inspection of the Final Cover and Vegetation	
	(d)	Planned Uses of Property at MSWLF Units	
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35.	811.112	RECORDKEEPING REQUIREMENTS FOR MSWLF UNITS           Location Restriction Demonstration	
	(a)		
	(b)	Load Checking Requirements	<u> </u>
	(c)	Gas Monitoring Records	
	(d)	MSWLF Liquid Restriction Records	
	(e)	Groundwater Monitoring Program Requirements	
		O' Dest Olegene Care Description ente	
	(f)	Closure and Post Closure Care Requirements	
	(f) (g)	Closure and Post Closure Care Requirements Cost Estimates and Financial Assurance Requirements	
	(f)		
36.	(f) (g) PART 811 SUBPART	Cost Estimates and Financial Assurance Requirements PUTRESCIBLE AND CHEMICAL WASTE LANDFILLS FACILITY LOCATION	
36.	(f) (g) PART 811 SUBPART C	Cost Estimates and Financial Assurance Requirements PUTRESCIBLE AND CHEMICAL WASTE LANDFILLS	
<u>36.</u> 37.	(f) (g) PART 811 SUBPART C 811.302	Cost Estimates and Financial Assurance Requirements PUTRESCIBLE AND CHEMICAL WASTE LANDFILLS FACILITY LOCATION	
	(f) (g) PART 811 SUBPART C 811.302 (c)	Cost Estimates and Financial Assurance Requirements PUTRESCIBLE AND CHEMICAL WASTE LANDFILLS FACILITY LOCATION Site Screening (Does Not Apply To Part 814-Subpart D Sites)	
	(f) (g) PART 811 SUBPART C 811.302 (c) 811.309	Cost Estimates and Financial Assurance Requirements         PUTRESCIBLE AND CHEMICAL WASTE LANDFILLS         FACILITY LOCATION         Site Screening (Does Not Apply To Part 814-Subpart D Sites)         LEACHATE TREATMENT AND DISPOSAL SYSTEM	
	(f) (g) PART 811 SUBPART C 811.302 (c) 811.309 (a)	Cost Estimates and Financial Assurance Requirements         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	
	(f) (g) PART 811 SUBPART C 811.302 (c) 811.309 (a) (c) (d)	Cost Estimates and Financial Assurance Requirements         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	
	(f) (g) PART 811 SUBPART C 811.302 (c) 811.309 (a) (c) (d) (c) (d) (e)	Cost Estimates and Financial Assurance Requirements         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	
	(f) (g) PART 811 SUBPART C 811.302 (c) 811.309 (a) (c) (d)	Cost Estimates and Financial Assurance Requirements         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	
	(f) (g) PART 811 SUBPART C 811.302 (c) 811.309 (a) (c) (d) (c) (d) (e) (f)	Cost Estimates and Financial Assurance Requirements         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	
37.	(f) (g) PART 811 SUBPART C 811.302 (c) 811.309 (a) (c) (d) (c) (d) (e) (f) (g) 811.310	Cost Estimates and Financial Assurance Requirements         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	U
37.	(f) (g) PART 811 SUBPART C 811.302 (c) 811.309 (a) (c) (d) (c) (d) (e) (d) (e) (f) (g) 811.310 (b)	Cost Estimates and Financial Assurance Requirements         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         LANDFILL GAS MONITORING (FOR SITES ACCEPTING PUTRESCIBLE	U
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37.	(f) (g) PART 811 SUBPART C 811.302 (c) 811.309 (a) (c) (d) (c) (d) (e) (f) (g) 811.310 (b) (c) (d)	Cost Estimates and Financial Assurance Requirements         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 Recycling Systems         Standards for Leachate Recycling Systems         Standards for Leachate Monitoring Systems         Standards for Leachate Monitoring Systems         Monitoring Frequency for Landfill Gas         Monitoring Parameters         LANDFILL GAS MANAGEMENT SYSTEM (FOR CHEMICAL AND PUTRESCIENT)	
37.	(f) (g) PART 811 SUBPART C 811.302 (c) 811.309 (a) (c) (d) (c) (d) (e) (f) (g) 811.310 (b) (c) (d) (d) 811.310	Cost Estimates and Financial Assurance Requirements         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 Recycling Systems         Standards for Leachate Recycling Systems         Standards for Leachate Monitoring Systems         LANDFILL GAS MONITORING (FOR SITES ACCEPTING PUTRESCIBLE         Location and Design of Gas Monitoring Wells         Monitoring Frequency for Landfill Gas         Monitoring Parameters	
37.	(f)         (g)         PART 811         SUBPART         C         811.302         (c)         811.309         (a)         (c)         (d)         (e)         (f)         (g)         811.310         (b)         (c)         (d)         (a)         (b)         (c)         (d)         (a)	Cost Estimates and Financial Assurance Requirements         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 Recycling Systems         Standards for Leachate Recycling Systems         Standards for Leachate Monitoring Systems         Standards for Leachate Monitoring Systems         Monitoring Frequency for Landfill Gas         Monitoring Parameters         LANDFILL GAS MANAGEMENT SYSTEM (FOR CHEMICAL AND PUTRE LANDFILLS)	
37.	(f) (g) PART 811 SUBPART C 811.302 (c) 811.309 (a) (c) (d) (c) (d) (e) (f) (g) 811.310 (b) (c) (d) (d) 811.310	Cost Estimates and Financial Assurance Requirements         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         LANDFILL GAS MONITORING (FOR SITES ACCEPTING PUTRESCIBLE         Location and Design of Gas Monitoring Wells         Monitoring Parameters         LANDFILL GAS MANAGEMENT SYSTEM (FOR CHEMICAL AND PUTRE         LANDFILLS)         Conditions for Installation of Gas Management System	

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LPC #: 0390055036

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Inspection Date: December 29,2014

40.	811.312	LANDFILL GAS PROCESS AND DISPOSAL SYSTEM	
40.		No Unpermitted Gas Discharge	
	(c)	Gas Flow Rate Measurements into Treatment of Combustion Device	
	(d)	Standards for Gas Flares	
	(e)	Standards for On-Site Combustion of Landfill Gas Using Devices Other Than	
	(f)	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 HAV CLOSED, COVERED AND VEGETATED PRIOR TO SEPTEMBER 18, 1990)	E
	(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	
	(a)	Special Waste Profile Identification Sheet	
	(b)	Special Waste Recertification	
50.	811.405	RECORDKEEPING REQUIREMENTS	
51.	811.406	PROCEDURES FOR EXCLUDING REGULATED HAZARDOUS WASTES	

	PART 811 SUBPART G	FINANCIAL ASSURANCE	
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	
		OTHER REQUIREMENTS	
58.	OTHER:	APPARENT VIOLATION OF: ( ) PCB; ( ) CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	
59.			

#### 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.
- 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.

### Illinois Environmental Protection Agency

Bureau of Land + Field Operations Section + Champaign

LPC#0390055036—DeWitt County Clinton/Clinton Landfill #3 FOS File December 29, 2014 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 December 29, 2014. 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 on vacation, so Kyle Martin, Compliance Manager, accompanied me during the visit. Eleven (11) photos were taken of Unit #3. The weather was mostly clear and temperatures in the high 30s. The ground had been frozen, but thawed enough to make the less-used roads slippery with a glaze of mud.

#### **Site Inspection**

When I arrived at the landfill I checked in at the landfill office. Mr. Bryant was out of the office on vacation for the holidays, and the landfill part of the main office was empty. I drove to the scalehouse, where the administrative employee that normally works in the office was running the scales. Bill, the normal scale operator, was busy running a road grader. While at the scalehouse, I checked the facility's inspection logs, special waste logs, and asbestos logs. No new special wastes had been accepted since my last inspection, so I did not check any waste profile documents during this visit.

Special wastes accepted included empty containers from Dynachem, sludge from Depue Group, Fermentation broth from Solazyme Manufacturing, foundry sand and refractory from Mueller, and water from an MGP site in LaSalle.

I after checking paperwork, I drove to the landfill and found Kyle Martin at the Unit #3 flare. One of Kyle's main duties is managing the gas extraction system on all the site's landfill units. The gas wells are monitored to determine the optimum vacuum to use to extract the most gas from the landfill, without drawing oxygen into the fill which could cause and underground fire.

The small gas flare servicing Unit 3 was operating normally. The facility plans to construct piping to connect Unit #3 with the gas system and gas-to-energy plant located northwest of Unit #2. A main gas header has been recently installed and permitted to collect the gas from Unit #3. The gas plant was currently not operating. Martin said a

new company had purchased the plant, and had removed the gas engines. The older engines were being replaced by two newer engines, with the possibility of expanding with additional engines in the future. The two flares near the plant were being used to control gas in the meantime.

I then drove to the Chemical Waste Unit (CWU). The CWU was not in use. Since Modification 47 to the facility's permit banned the disposal of Manufactured Gas Plant (MGP) waste exceeding the regulatory levels for characteristically hazardous waste, the only waste accepted by the CWU is a salt waste from 3M. When waste arrives, the landfill has a small berm for the truck to drive over to dump the load. The berm keeps any stormwater from exiting the area where the waste was placed before it was covered.

Leachate is stored in a double walled tank below the concrete pad. Leachate is pumped from a sump running along the sidewall liner and into the storage tank. Any spills from the loading of leachate drains back into the tank.

We then looked at the south sedimentation basin (photo 3). Kyle said he had recently sampled the pond, and planned to discharge stormwater from the basin later in the day. The stormwater flows into a creek south of the facility.

I then looked at the active area, which was located in Cell 3B a short distance from the sidewall (photo 4). The area was busy, with several trucks actively dumping while I watched. Four trucks were lined up waiting their turn to dump. The areas around the active area were well covered and no litter was observed. No banned waste, such as tires, landscape waste, or electronics were found.

The new cell designated 5B and 3C had been completed. The new cell is east of the current 5A, and includes a finger extending north to complete the last potion of Section 3 (photos 5-10). The HDPE liner, lecahate collection system, and drainage layer had been installed.

I have observed the construction of the new cell for the past several inspections. During my last visit, the engineer said a sand layer was encountered over the native clay leading from the northeast section of the cell to the southwest corner. The facility's permit requires that the base of the recompacted layer rest on native clay and all sand be removed. Clay is then added back over the native clay and recompacted in 6 inch lifts until the elevation of the floor base is reached. In the area where the sand seam was found, a total of 10-12 feet of recompacted clay liner was added to reach the final elevation, while other areas had 6-8 feet of compacted clay installed. The minimum requirements are for 3 feet of recompacted clay.

Mr. Martin and I then drove to the liquid waste solidification area located on top of Cell 1C (photo 11) 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

LPC#0380055036—Dewitt County Clinton/Clinton Landfill #3

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 ash contains a large amount of lime added to the coal when it is burned to control air pollution. When the lime contacts water, the dissolution reaction is very exothermic and generates heat. The reaction can cause the liquid to bubble and froth. On cold days steam can be seen rising from the tank.

#### 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 47 was issued on July 31, 2014. This modification basically revokes the landfill's permission to accept MGP waste that exceeds the toxicity characteristic in 35 Ill. Adm. Code 721.124(b). Although Section 721.124(a) of the Regulations enacted by The Pollution Control Board specifically excludes MGP waste that exceeds the toxicity characteristic from being a RCRA regulated hazardous waste, the Agency has excluded these wastes from being disposed in a regular municipal solid waste landfill via permit restrictions. Clinton Landfill was allowed to dispose of these wastes in its CWU, which is engineered to the more restrictive Subtitle C standards. The Agency's basis for the revoking the permit is an issue of whether proper local siting was obtained for the CWU..

In addition to the exclusion of MGP source material from the CWU, the new permit also revokes the Agency's permission to accept PCB contaminated materials that exceed the 50 parts per million limits in the Toxic Substance Control Act (TSCA). The landfill has never accepted TSCA regulated materials, since it needed approval by USEPA to receive the material. The Federal permit was never issued.

Modification 48 was issued on September 17, 2014. This modification approved revisions to conditions governing the use of waste water treatment plant sludges used as alternate daily cover.

Modification 49, issued on November 26, 2014 approved the Construction Quality Assurance (CQA) report for the construction of Phase 1 of the Main Landfill Gas Header.

Modification 50, issued on December 14, 2014, approved the alternate source demonstrations for 2<sup>nd</sup> quarter 2013, 4<sup>th</sup> quarter 2013, and 1<sup>st</sup> quarter 2014 confirmed groundwater exceedances and revised groundwater AGQS/MAPC values.

The estimate for closure of the current landfill's 29 acres of municipal solid waste disposal and 6.14 acres comprising the CWU is \$10,475,467. This value includes

\$4,591,217 for premature closure, and \$5,844,250 for post-closure care. The landfill currently has \$10,932,021 in posted financial assurance. This amount will be increased when the new cell begins operating.

#### **Record Review**

The facility has 60 groundwater monitoring wells installed. Fifteen upgradient and 45 downgradient wells monitor the four groundwater zones beneath the landfill.

The latest groundwater sampling information imaged by the Agency was a September 10, 2014 report documenting exceedances from the 3rd quarter sampling event. Most of the exceedances were addressed in permit Modification 50. Additional exceedances, especially with dissolved nitrogen found in many wells across the site, will be the subject of a future alternate source demonstration in the form of a permit modification.

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



03966556636 Dewitte Chatal Clinton LF #3



### DIGITAL PHOTOGRAPHS

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





DATE: December 29, 2014 TIME: 10:00-11:00 A.M. DIRECTION: South PHOTO by: Dustin Burger PHOTO FILENAME: 0390055036~12292014-002.jpg COMMENTS: Chemical Waste unit





# DIGITAL PHOTOGRAPHS

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

DATE: December 29, 2014 TIME: 10:00-11:00 A.M. DIRECTION: East PHOTO by: Dustin Burger PHOTO FILENAME 0390055036~12292014-003.jpg COMMENTS: South stormwater detention basin



DATE December 29, 2014 TIME: 10:00-11:00 A.M. DIRECTION: East PHOTO by: Dustin Burger PHOTO FILENAME: 0390055036~12292014-004.jpg COMMENTS: Active Area





# DIGITAL PHOTOGRAPHS

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

DATE: December 29, 2014 TIME: 10:00-11:00 A.M. DIRECTION: WNW PHOTO by: Dustin Burger PHOTO FILENAME: 0390055036~12292014-005.jpg COMMENTS: New Cell



DATE: December 29, 2014 TIME: 10:00-11:00 A.M. DIRECTION: Northwest PHOTO by: Dustin Burger PHOTO FILE NAME: 0390055036~12292014-006.jpg COMMENTS: New cell





## DIGITAL PHOTOGRAPHS

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

DATE: December 29, 2014 TIME: 10:00-11:00 A.M. DIRECTION: West PHOTO by: Dustin Burger PHOTO FILENAME: 0390055036~12292014-007.jpg COMMENTS: New Cell

DATE: December 29, 2014 TIME: 10:00-11:00 A.M. DIRECTION: West PHOTO by: Dustin Burger PHOTO FILE NAME: 0390055036~12292014-008.jpg COMMENTS: New cell







## DIGITAL PHOTOGRAPHS

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

DATE: December 29, 2014 TIME: 10:00-11:00 A.M. DIRECTION: Southwest PHOTO by: Dustin Burger PHOTO FILE NAME: 0390055036~12292014-009.jpg COMMENTS:

DATE: December 29, 2014 TIME: 10:00-11:00 A.M. DIRECTION: Southwest PHOTO by: Dustin Burger PHOTO FILE NAME: 0390055036~12292014-010.jpg COMMENTS: New cell





### DIGITAL PHOTOGRAPHS

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

DATE: December 29, 2014 TIME: 10:00-11:00 A.M. DIRECTION: Southwest PHOTO by: Dustin Burger PHOTO FILE NAME: 0390055036~12292014-011.jpg COMMENTS: Solidification area

