



# 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

December 18, 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 December 9, 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.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Paul M. Purseglove".

Paul M. Purseglove, 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: 12/09/2013 Time: From 11:00A To 11:30A Previous Inspection Date: 10/28/2013  
 Inspector(s): Dustin Burger Weather: Mostly clear, West winds at 15, 1-in snow, 20s  
 No. of Photos Taken: # 7 Samples Taken: Yes #        No   
 Interviewed: David Bryant, Site 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 43 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
<b>ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS</b>			
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"/>

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"/>
<b>NEW SOLID WASTE LANDFILL REQUIREMENTS</b>			
	<b>PART 811 SUBPART</b>	<b>GENERAL STANDARDS FOR ALL LANDFILLS</b>	
26.	811.103	<b>SURFACE WATER DRAINAGE</b>	
	(a)	Runoff from Disturbed Areas	<input type="checkbox"/>
	(b)	Diversion of Runoff from Undisturbed Areas	<input type="checkbox"/>
27.	811.104	<b>SURVEY CONTROL</b>	
	(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	<b>COMPACTION</b>	<input type="checkbox"/>
29.	811.106	<b>DAILY COVER</b>	
	(a)	Six Inches Soil	<input type="checkbox"/>
	(b)	Alternative Daily Cover	<input type="checkbox"/>
30.	811.107	<b>OPERATING STANDARDS</b>	
	(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	<b>SALVAGING</b>	
	(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	<b>BOUNDARY CONTROL</b>	
	(a)	Access Restricted	<input type="checkbox"/>
	(b)	Proper Sign Posted	<input type="checkbox"/>

40.	811.312	<b>LANDFILL GAS PROCESS AND DISPOSAL SYSTEM</b>	
	(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	<b>INTERMEDIATE COVER</b>	
	(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	<b>FINAL COVER SYSTEM (DOES NOT APPLY TO PART 814 SITES THAT HAVE CLOSED, COVERED AND VEGETATED PRIOR TO SEPTEMBER 18, 1990)</b>	
	(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	<b>PLUGGING AND SEALING OF DRILL HOLES</b>	<input type="checkbox"/>
44.	811.321	<b>WASTE PLACEMENT</b>	
	(a)	Phasing of Operations	<input type="checkbox"/>
	(b)	Initial Waste Placement	<input type="checkbox"/>
45.	811.322	<b>FINAL SLOPE AND STABILIZATION</b>	
	(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	<b>LOAD CHECKING PROGRAM</b>	
	(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"/>
	<b>PART 811 SUBPART D</b>	<b>MANAGEMENT OF SPECIAL WASTES AT LANDFILLS</b>	
47.	811.402	<b>NOTICE TO GENERATORS AND TRANSPORTERS</b>	<input type="checkbox"/>
48.	811.403	<b>SPECIAL WASTE MANIFESTS REQUIREMENTS</b>	<input type="checkbox"/>
49.	811.404	<b>IDENTIFICATION RECORD</b>	
	(a)	Special Waste Profile Identification Sheet	<input type="checkbox"/>
	(b)	Special Waste Recertification	<input type="checkbox"/>
50.	811.405	<b>RECORDKEEPING REQUIREMENTS</b>	<input type="checkbox"/>
51.	811.406	<b>PROCEDURES FOR EXCLUDING REGULATED HAZARDOUS WASTES</b>	<input type="checkbox"/>

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

LPC#0390055036—DeWitt County  
Clinton/Clinton Landfill #3  
FOS File  
December 9, 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 December 9, 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, accompanied me during the visit. Seven photos were taken of Unit #3. The weather was mostly clear with west winds at 15 and light coating of snow and temperatures in the 20s.

**Site Inspection**

When I arrived at the landfill I checked in at the landfill office and met Dave Bryant, the site Manager.

Not much had changed since my last visit on October 28, 2013. The active area was located in Cell 5A1. With the brisk wind from the west working at the lower elevation helped keep the wind from blowing litter. The areas around the active area were adequately covered. I watched several trucks unload, but did not see any banned waste, such as electronics, landscape wastes, or tires in any of the loads. The truck tipper was placed near the area, but no semi-trucks that needed its services were unloaded while I was present (photos 1-2).

East of the active area the facility was beginning to excavate for what will eventually be Cell 5B. Work has stopped on the excavation of the new cell since the weather has turned and become colder with new snowfall. The cell is slated to be complete at the end of the 2014 construction season (photo 5).

The waste solidification area on top of Cell 1C was not being used during the inspection (photo 5). The trees and sedimentation pond on the north side of the facility were free from litter. The landfill had received some of the piping and leachate knock-out tank for a new gas header for the landfill gas collection system (photo 1). The facility plans to install the main gas headers and leachate condensate tank within the next few months. Several new gas wells and a larger flare will also be installed.

remaining exceedances. Most of the exceedances were common inorganic constituents. Organic constituents were found in wells G225R, R16R, G05M, G25N, G25D, and G26D. G05M is an upgradient well.

The landfill submitted resample results from the 2<sup>nd</sup> quarter sampling event to the Agency on November 1, 2013. The facility stated they will submit a significant permit modification demonstrate the confirmed increases are not a result of landfill activities. This alternate source demonstration will be due within 180 days of the initial sampling event.

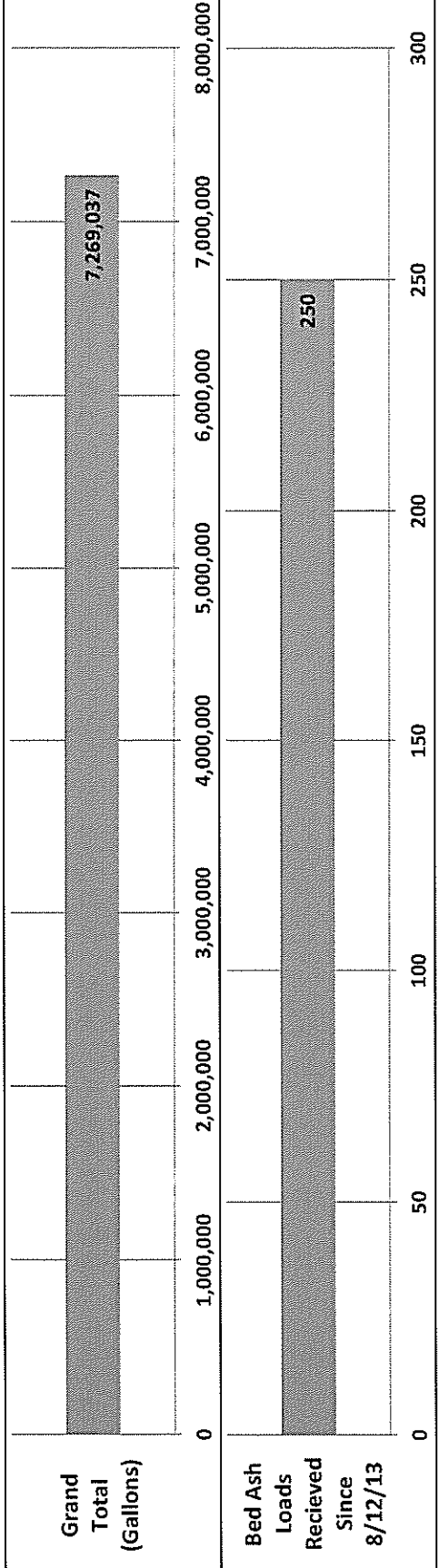
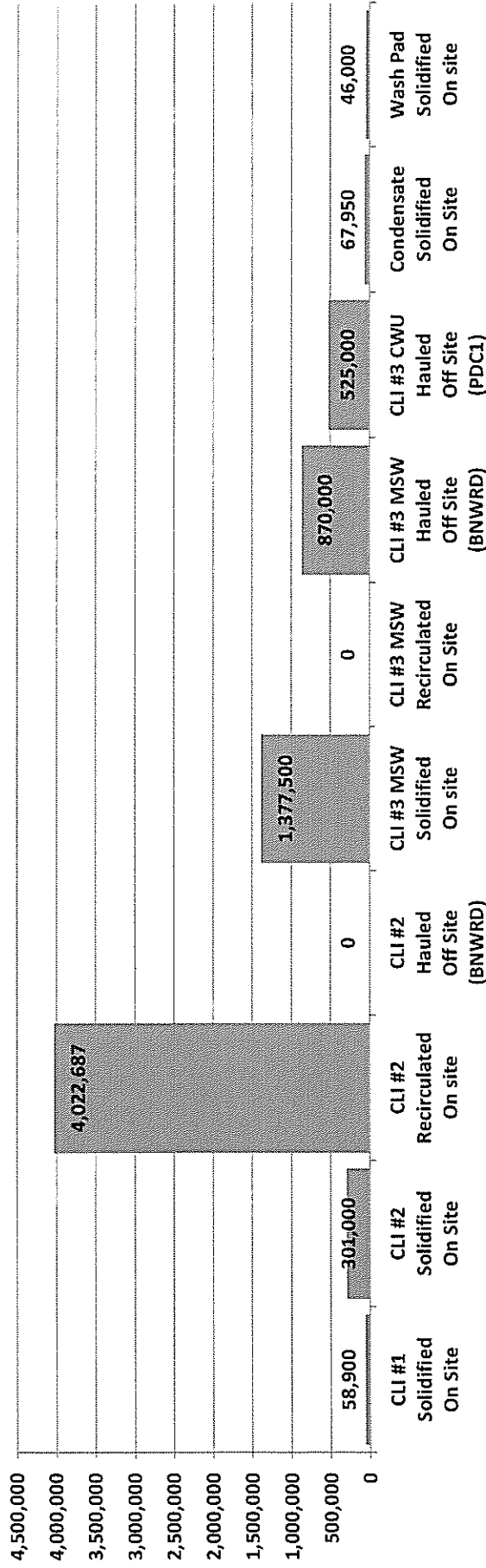
The landfill disposes of leachate in one of three ways. First, the liquids can be recirculated. Unit #3 does not yet have a recirculation systems installed. Second, leachate and landfill gas condensate can be solidified with ash and disposed as solid waste. Thirdly, leachate can be hauled off site for 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. Mr. Bryant provided me with a chart with year-to-date leachate disposal summaries which is attached to this report.

### **Summary of Apparent Violations**

No violations were noted during the inspection

# Clinton Landfill, Inc. Leachate Management Summary Annual 2013 (Gallons)

BNWRD = Bloomington Normal Water Reclamation Department, Heyworth IL  
PDC1 = Peoria Disposal Companies, PDC1 Facility, Peoria IL









Illinois Environmental Protection Agency  
Bureau of Land

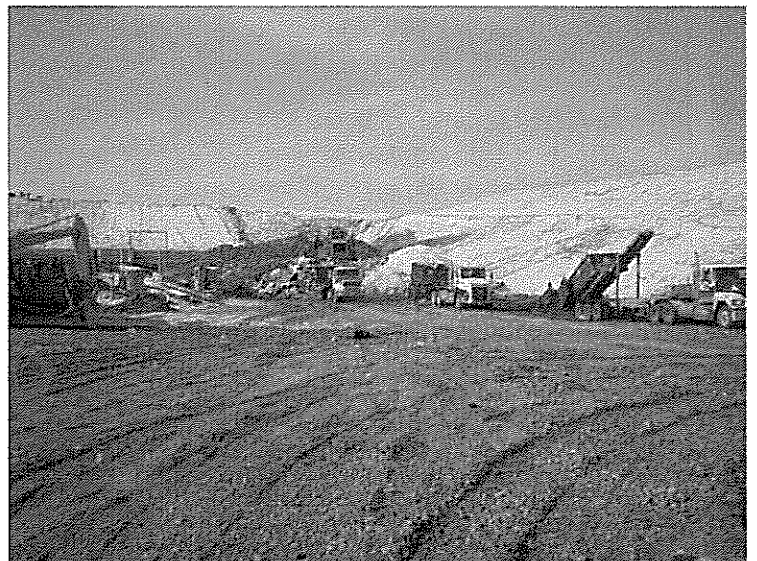
## ***DIGITAL PHOTOGRAPHS***

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

DATE: December 9, 2013  
TIME: 11:00-11:30AM  
DIRECTION: North  
PHOTO by: Dustin Burger  
PHOTO FILENAME:  
0390055036~12092013-001.jpg  
COMMENTS:



DATE: December 9, 2013  
TIME: 11:00-11:30AM  
DIRECTION: West  
PHOTO by: Dustin Burger  
PHOTO FILENAME:  
0390055036~12092013-002.jpg  
COMMENTS:





Illinois Environmental Protection Agency  
Bureau of Land

## ***DIGITAL PHOTOGRAPHS***

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

DATE: December 9, 2013  
TIME: 11:00-11:30AM  
DIRECTION: East  
PHOTO by: Dustin Burger  
PHOTO FILENAME:  
0390055036~12092013-005.jpg  
COMMENTS:



DATE: December 9, 2013  
TIME: 11:00-11:30AM  
DIRECTION: SSE  
PHOTO by: Dustin Burger  
PHOTO FILENAME:  
0390055036~12092013-006.jpg  
COMMENTS:





**PDC Technical Services, Inc.**

4349 Southport Road, P.O. Box 9071  
Peoria, Illinois 61615  
309.676.4893  
www.pdcarea.com

PDC Project No. 91-0118.13

November 1, 2013

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

**RE: 0390055036--DeWitt County  
Clinton Landfill No. 3  
Permit No. 2005-070-LF  
Modification No. 40  
Section VIII. Groundwater Monitoring  
Special Condition 14**

**RECEIVED**  
NOV 04 2013  
IEPA-BOL  
PERMIT SECTION

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 July 15, 2013 reporting period at the Clinton Landfill No. 3 (Facility), in accordance with the above-referenced permit condition. CLI notified the Agency of the initial 2<sup>nd</sup> quarter 2013 exceedances and intent to conduct confirmation sampling for selected parameters in a letter dated August 23, 2013. Table 1 is attached to show the wells, parameters, initial and resample results, and the associated standards.

Resample results confirmed a number of the apparent exceedances, as summarized in Table 1. Pursuant to Special Condition VIII.15 of the Facility permit, CLI will submit a significant permit modification application within 180 days of the initial sampling event in order to demonstrate that the confirmed exceedances from the 2<sup>nd</sup> quarter 2013 are attributable to a source other than the Facility. CLI will continue routine detection monitoring for those parameters which did not confirm.

As discussed in the August 23, 2013 correspondence, several of the apparent parameter exceedances which were identified in the 2<sup>nd</sup> quarter 2013 were observed at concentrations that were similar to or lower than concentrations which were previously identified and confirmed as exceedances. The 2<sup>nd</sup> quarter 2013 exceeding parameters listed in Table 2 were addressed in significant permit modification applications submitted on January 23, 2013 (Log No. 2013-030) and August 5, 2013 (Log No. 2013-379) to demonstrate that exceedances from the 3<sup>rd</sup> and 4<sup>th</sup> quarters of 2012 and the 1<sup>st</sup> quarter of 2013 were not attributable to a release from the Facility. Therefore, no additional sampling was conducted for the parameters listed in Table 2, and those parameters will not be further addressed in the significant permit modification application that

**Our Work: Here to serve.**

**Our Promise: Here to protect.**

**Our Future: Here to preserve.**

**TABLE 1**  
**Clinton Landfill No. 3**  
**Summary of Confirmation Sample Results – 2<sup>nd</sup> Quarter 2013**

Well	Parameter	Units	Initial Result	Interwell AGQS/MAPC	Resample Results
<b>ROXANA SILT/ROBEIN MEMBER WELLS</b>					
G02R <sup>#</sup>	Specific Conductance, Field Measured	µmhos/cm	1350	1281	1280
G04R <sup>#</sup>	Specific Conductance, Field Measured	µmhos/cm	1480	1281	1210
G04R <sup>#</sup>	Sulfate, Dissolved	mg/L	160	156.6	130
G04R <sup>#</sup>	Zinc, Dissolved	µg/L	17	11	<6
G08R	Nitrate-N, Dissolved	mg/L	0.29	0.06	1.5
G09R	Nitrate-N, Dissolved	mg/L	0.58	0.06	2
G20R	Magnesium, Dissolved	mg/L	140	101.4	140
G20R	Total Dissolved Solids	mg/L	2600	946.5	2300
G20R	Specific Conductance, Field Measured	µmhos/cm	3450	1281	1586
G20R	Sulfate, Dissolved	mg/L	1500	156.6	1700
G25R	cis-1,2-Dichloroethene	µg/L	1.6	1	<1
G25R	Nitrate-N, Dissolved	mg/L	1.4	0.06	1.4
G25R	Sulfate, Dissolved	mg/L	220	156.6	360
G26R	Nitrate-N, Dissolved	mg/L	0.09	0.06	0.25
G26R	Total Dissolved Solids	mg/L	950	946.5	960
G26R	Sulfate, Dissolved	mg/L	410	156.6	410
G39R	Specific Conductance, Field Measured	µmhos/cm	1330	1281	1294
G47R	Boron, Dissolved	µg/L	630	565.5	510
G47R	Specific Conductance, Field Measured	µmhos/cm	1690	1281	1420
G48R	Nitrate-N, Dissolved	mg/L	0.3	0.06	0.22
G48R	Sulfate, Dissolved	mg/L	210	156.6	200
G49R	Arsenic, Dissolved	µg/L	24	11	6.7
G49R	Total Dissolved Solids	mg/L	980	946.5	1100
G49R	Specific Conductance, Field Measured	µmhos/cm	1430	1281	1245
G49R	Sulfate, Dissolved	mg/L	270	156.6	270
G58R <sup>#</sup>	Nitrate-N, Dissolved	mg/L	0.12	0.06	<0.02
G58R <sup>#</sup>	Sulfate, Dissolved	mg/L	170	156.6	180
G59R	Magnesium, Dissolved	mg/L	120	101.4	100
G59R	Nitrate-N, Dissolved	mg/L	0.57	0.06	0.9
G59R	Total Dissolved Solids	mg/L	1200	946.5	1100
G59R	Specific Conductance, Field Measured	µmhos/cm	1610	1281	1158
G59R	Sulfate, Dissolved	mg/L	550	156.6	510
R16R	Nitrate-N, Dissolved	mg/L	0.38	0.06	0.04
R16R	Total Dissolved Solids	mg/L	2100	946.5	820
R16R	Specific Conductance, Field Measured	µmhos/cm	1290	1281	1430
R16R	Tetrahydrofuran	µg/L	21	10	<10

**TABLE 1 (cont'd)**  
**Clinton Landfill No. 3**  
**Summary of Confirmation Sample Results – 2<sup>nd</sup> Quarter 2013**

Well	Parameter	Units	Initial Result	Interwell AGQS/MAPC	Resample?
R17R <sup>#</sup>	Nitrate-N, Dissolved	mg/L	13	0.06	0.04
R17R <sup>#</sup>	Specific Conductance, Field Measured	µmhos/cm	1640	1281	<b>1550</b>
<b>UPPER RADNOR TILL SAND WELLS</b>					
G49S	Nitrate-N, Dissolved	mg/L	0.68	0.29	0.15
G50S	Arsenic, Dissolved	µg/L	18	125.4	53
<b>LOWER RADNOR TILL SAND WELLS</b>					
G01M <sup>#</sup>	Sulfate, Dissolved	mg/L	100	65	<b>160</b>
G05M <sup>#</sup>	Bromomethane	µg/L	5.4	2	<1
G05M <sup>#</sup>	Chloromethane	µg/L	2.2	2	<1
G08M <sup>#</sup>	Nitrate-N, Dissolved	mg/L	0.42	0.14	<0.02
G16M	Nitrate-N, Dissolved	mg/L	12	0.14	<b>3.8</b>
G25M	cis-1,2-Dichloroethene	µg/L	2.2	1	<1
G25M	Trichloroethene	µg/L	1.2	1	<1
G26M	pH, Field Measured	s.u.	8.06	5.79 - 7.97	7.39
G39M	Nitrate-N, Dissolved	mg/L	14	0.14	0.07
G47M	Boron, Dissolved	µg/L	630	622	<b>720</b>
G47M	Magnesium, Dissolved	mg/L	89	82.2	<b>85</b>
G48M	Chromium, Dissolved	µg/L	5.2	4.6	<4
G48M	Lead, Dissolved	µg/L	2.1	1	<1
G49M	Specific Conductance, Field Measured	µmhos/cm	1470	1457	1410
R17M	Specific Conductance, Field Measured	µmhos/cm	1620	1457	<b>1470</b>
<b>ORGANIC SOILS WELLS</b>					
G03D <sup>#</sup>	Specific Conductance, Field Measured	µmhos/cm	1994	1383	1030
G06D <sup>#</sup>	Magnesium, Dissolved	mg/L	73	72.1	64
G09D	Nitrate-N, Dissolved	mg/L	2.8	1.5	<0.02
G09D	Sulfate, Dissolved	mg/L	150	76	<b>160</b>
G16D	Nitrate-N, Dissolved	mg/L	6.3	1.5	<0.02
G25D	cis-1,2-Dichloroethene	µg/L	3.7	1	<1
G25D	Trichloroethene	µg/L	2	1	<1
G26D	cis-1,2-Dichloroethene	µg/L	1.3	1	<1

Notes:

1. <sup>#</sup>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 laboratory reporting limit
7. Resample results displayed in **BOLD** exceeded the established interwell AGQS/MAPC value.