



# 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

July 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 June 10, 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,

Paul M. Purselglove, 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#: 0390055036 Region: 4 - Champaign  
 Location/Site Name: Clinton/Clinton Landfill #3  
 Date: 06/10/2013 Time: From 10:15A To 11:20A Previous Inspection Date: 04/16/2013  
 Inspector(s): Dustin Burger Weather: Overcast, dry, 70s  
 No. of Photos Taken: # 11 Samples Taken: Yes # \_\_\_\_\_ No   
 Interviewed: Dave 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 39 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"/>

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		<b>CONDUCT A SANITARY LANDFILL OPERATION WHICH RESULTS IN ANY OF THE FOLLOWING CONDITIONS:</b>	
10.	21(o)		<input type="checkbox"/>
	(1)	Refuse in Standing or Flowing Water	<input type="checkbox"/>
	(2)	Leachate Flows Entering Waters of the State	<input type="checkbox"/>
	(3)	Leachate Flows Exiting the Landfill Confines	<input type="checkbox"/>
	(4)	Open Burning of Refuse in Violation of Section 9 of the Act	<input type="checkbox"/>
	(5)	Uncovered Refuse Remaining From Any Previous Operating Day or at the Conclusion of Any Operating Day	<input type="checkbox"/>
	(6)	Failure to Provide Final Cover Within Time Limits	<input type="checkbox"/>
	(7)	Acceptance of Wastes Without Necessary Permits	<input type="checkbox"/>
	(8)	Scavenging as Defined by Board Regulations	<input type="checkbox"/>
	(9)	Deposition of Refuse in Any Unpermitted Portion of the Landfill	<input type="checkbox"/>
	(10)	Acceptance of Special Waste Without a Required Manifest	<input type="checkbox"/>
	(11)	Failure to Submit Reports Required by Permits or Board Regulations	<input type="checkbox"/>
	(12)	Failure to Collect and Contain Litter by the End of each Operating Day	<input type="checkbox"/>
	(13)	Failure to Submit Any Cost Estimate, Performance Bond or Other Security	<input type="checkbox"/>
11.	21(t)	<b>CAUSE OR ALLOW A LATERAL EXPANSION OF A MUNICIPAL SOLID WASTE LANDFILL (MSWLF) UNIT WITHOUT A PERMIT MODIFICATION</b>	<input type="checkbox"/>
12.	21.6(b)	<b>ACCEPTANCE OF LIQUID USED OIL FOR FINAL DISPOSAL (EFFECTIVE JULY 1, 1996)</b>	<input type="checkbox"/>
13.	22.01	<b>FAILURE TO SUBMIT ANNUAL NONHAZARDOUS SPECIAL WASTE</b>	<input type="checkbox"/>
14.	22.17	<b>LANDFILL POST-CLOSURE CARE</b>	<input type="checkbox"/>
	(a)	Failure to Monitor Gas, Water, Settling	<input type="checkbox"/>
	(b)	Failure to Take Remedial Action	<input type="checkbox"/>
15.	22.22(c)	<b>ACCEPTANCE OF LANDSCAPE WASTE FOR FINAL DISPOSAL</b>	<input type="checkbox"/>
16.	22.23(f)(2)	<b>CAUSE OR ALLOW THE DISPOSAL OF ANY LEAD-ACID BATTERY</b>	<input type="checkbox"/>
17.	22.28(b)	<b>ACCEPTANCE OF WHITE GOODS FOR FINAL DISPOSAL</b>	<input type="checkbox"/>
18.	55(b)(1)	<b>ACCEPTANCE OF ANY USED OR WASTE TIRE FOR FINAL DISPOSAL (UNLESS LANDFILL MEETS EXEMPTION OF 55(b)(1))</b>	<input type="checkbox"/>
19.	56.1(a)	<b>CAUSE OR ALLOW THE DISPOSAL OF ANY POTENTIALLY INFECTIOUS MEDICAL WASTE</b>	<input type="checkbox"/>
<b>SOLID WASTE SITE OPERATOR CERTIFICATION LAW REQUIREMENTS</b>			
20.	225 ILCS 230/1004	<b>CAUSING OF ALLOWING OPERATION OF A LANDFILL WITHOUT PROPER COMPETENCY CERTIFICATE</b>	<input type="checkbox"/>
<b>35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G</b>			
<b>PRIOR CONDUCT CERTIFICATION REQUIREMENTS</b>			
21.	745.181	<b>CHIEF OPERATOR REQUIREMENTS</b>	<input type="checkbox"/>
22.	745.201	<b>PRIOR CONDUCT CERTIFICATION PROHIBITIONS</b>	<input type="checkbox"/>
<b>SPECIAL WASTE HAULING REQUIREMENTS</b>			
23.	809.301	<b>REQUIREMENTS FOR DELIVERY OF SPECIAL WASTE TO HAULERS</b>	<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"/>

33.	811.110	<b>CLOSURE AND WRITTEN CLOSURE PLAN</b>	
		(a)	Final Slopes and Contours <input type="checkbox"/>
		(b)	Drainage Ways and Swales <input type="checkbox"/>
		(c)	Final Configuration <input type="checkbox"/>
		(d)	Written Closure Plan <input type="checkbox"/>
		(e)	Initiation of Closure Activities at MSWLF Units <input type="checkbox"/>
		(f)	Completion of Closure Activities at MSWLF Units <input type="checkbox"/>
		(g)	Deed Notation for MSWLF Units <input type="checkbox"/>
34.	811.111	<b>POST-CLOSURE MAINTENANCE</b>	
		(a)	Procedures After Receipt of Final Volume of Waste <input type="checkbox"/>
		(b)	Remove All Equipment of Structures <input type="checkbox"/>
		(c)	Maintenance and Inspection of the Final Cover and Vegetation <input type="checkbox"/>
	(d)	Planned Uses of Property at MSWLF Units <input type="checkbox"/>	
35.	811.112	<b>RECORDKEEPING REQUIREMENTS FOR MSWLF UNITS</b>	
		(a)	Location Restriction Demonstration <input type="checkbox"/>
		(b)	Load Checking Requirements <input type="checkbox"/>
		(c)	Gas Monitoring Records <input type="checkbox"/>
		(d)	MSWLF Liquid Restriction Records <input type="checkbox"/>
		(e)	Groundwater Monitoring Program Requirements <input type="checkbox"/>
		(f)	Closure and Post Closure Care Requirements <input type="checkbox"/>
	(g)	Cost Estimates and Financial Assurance Requirements <input type="checkbox"/>	
	<b>PART 811 SUBPART C</b>	<b>PUTRESCIBLE AND CHEMICAL WASTE LANDFILLS</b>	
36.	811.302	<b>FACILITY LOCATION</b>	
		(c)	Site Screening (Does Not Apply To Part 814-Subpart D Sites) <input type="checkbox"/>
37.	811.309	<b>LEACHATE TREATMENT AND DISPOSAL SYSTEM</b>	
		(a)	General Requirements <input type="checkbox"/>
		(c)	Standards for On-Site Treatment and Pretreatment <input type="checkbox"/>
		(d)	Standards for Leachate Storage System <input type="checkbox"/>
		(e)	Standards for Discharge to Off-Site Treatment <input type="checkbox"/>
		(f)	Standards for Leachate Recycling Systems <input type="checkbox"/>
		(g)	Standards for Leachate Monitoring Systems <input type="checkbox"/>
38.	811.310	<b>LANDFILL GAS MONITORING (FOR SITES ACCEPTING PUTRESCIBLE WASTE)</b>	
		(b)	Location and Design of Gas Monitoring Wells <input type="checkbox"/>
		(c)	Monitoring Frequency for Landfill Gas <input type="checkbox"/>
		(d)	Monitoring Parameters <input type="checkbox"/>
39.	811.311	<b>LANDFILL GAS MANAGEMENT SYSTEM (FOR CHEMICAL AND PUTRESCIBLE LANDFILLS)</b>	
		(a)	Conditions for Installation of Gas Management System <input type="checkbox"/>
		(b)	Notification and Implementation Requirements <input type="checkbox"/>
		(c)	Standards for Gas Venting <input type="checkbox"/>
		(d)	Standards for Gas Collection <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"/>

PART 811 SUBPART G		FINANCIAL ASSURANCE	
52.	811.700	COMPLY WITH FINANCIAL ASSURANCE REQUIREMENTS OF PART 811, SUBPART G	<input type="checkbox"/>
53.	811.701	UPGRADING FINANCIAL ASSURANCE	<input type="checkbox"/>
54.	811.704	CLOSURE AND POST-CLOSURE CARE COST ESTIMATES	<input type="checkbox"/>
55.	811.705	REVISION OF COST ESTIMATE	<input type="checkbox"/>
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	<input type="checkbox"/>
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	<input type="checkbox"/>
OTHER REQUIREMENTS			
58.	OTHER:	APPARENT VIOLATION OF: <input type="checkbox"/> PCB; <input type="checkbox"/> CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	<input type="checkbox"/>
59.			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>

Informational Notes

- [Illinois] Environmental Protection Act: 415 ILCS 5/4.
- Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G:
- 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.
- 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).
- 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  
June 10, 2013 Inspection  
Inspector: Dustin Burger  
GIS Information from BOL Inventory: N40.11507 W-88.9589

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JUL 16 2013  
**IEPA/BOL**

**Narrative Inspection Report**

I conducted a routine inspection at the above referenced facility on June 10, 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, the Compliance Manager, accompanied me during the visit. Two IEPA interns, Haley Smetanna and Luke Omahana, were also present. Eleven photos were taken of Unit #3. The weather was cloudy and mostly dry despite the heavy spring rains, with temperatures in the 70s. .

**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 us on our visit. We hopped into a gator ATV and we drove out to Unit #3. We first drove to the scalehouse and spoke to Mike. He explained how waste is inspected and weighed as it arrives at the facility. 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 DuQuoin 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, including the toxicity characteristics for which MGP wastes are exempted. Indeed, most of the contaminants of concern were actually below the labs detection limits.

After the visit to the scalehouse, we drove to the active area located in cell 3B and watched as several trucks unloaded (photos 1-2). The winds were calm today, so blowing litter was not an issue. The interns watched as both roll-off and rear loader trucks dumped waste. Bulldozers would push the waste to the active area, and compactor would run over the waste to compact the material. No semi-trailers were present during our visit, so the truck tipper was not being used. No banned wastes, such as tires, electronic devices, used oil, or landscape wastes were observed.

We next looked at the waste solidification area. A truck had just dumped a load of leachate into the buried railcar located on the top of Cell 1C, but solidification with coal

combustion ash had not yet started. The leachate normally reacts with an exothermic reaction and bubbles and froths as the lime in the ash reacts to the moisture.

The northern edge of the landfill area has 30-foot tall telephone poles with netting installed to prevent litter from blowing into the sedimentation pond where it is harder to remove. During my last inspection I had noted that high winds had carried minor amounts of litter into the trees on the north side of the landfill. Bryant had said remove the material required a man-lift, but could not be completed until the ground had dried out. Evidently the ground had dried enough since then, because the litter had been removed.

Construction of cell 5A is now complete. The cell had been excavated and the recompacted clay liner, HDPE liners, and leachate collection system installed. The facility received permission to begin using Cell 5A1 on May 10, 2013 in Permit Modification 39. The facility had just started to place the first lift of 10 feet of uncompacted waste in the cell (photos 3-4). We walked on the completed liner system to show the interns the liner design and installation. The leachate extraction was installed and pumping stormwater, now considered leachate, into the facility's holding tanks.

As part of the construction, the temporary wells on the south side of the active area were removed and replaced. The new wells were installed in time to take the required 4<sup>th</sup> quarter groundwater samples (photos 5-6, 8). The three wells in each cluster monitor a different water bearing zone.

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.

The Chemical Waste Unit (CWU) was receiving waste from a Manufactured Gas Plant (MGP) site in Rockford the day of the inspection. I took three photos of the CWU (photos 9-11). No waste had been received yet during the day of my inspection.

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.

Although not part of Unit #3, we also stopped by the flare system for Unit #2 to show the interns the design and operation of the gas collection system and gas-to-energy plant.

## **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 38 was granted on April 29, 2013. This modification approved the demonstration of compliance with the requirements of Condition IX.13 of the permit related to methane exceedences noted in perimeter probes PGP-2, PGP-3, PGP-8, and PGP-14 and the subsequent Recommended Action Plan to address the exceedences.

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.

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. First quarter testing confirmed the 4<sup>th</sup> quarter exceedences for dissolved nitrate and dissolved sulfate were noted in Well G54S. The facility submitted a June, 2013 permit application as required to demonstrate the exceedences is not causing by the landfill. The permit application notes that the well with the exceedance is actually 1,000 feet east of the CWU and was installed in January 2011. The highest dissolved sulfate concentrations in the well actually took place before waste was placed into the CWU. The closer wells in the G53 series would likely show exceedences if the exceedences were actually caused by the landfill. All evidence seems to point the exceedences as being a naturally occurring variance in groundwater quality.

Groundwater exceedences in six wells in the April 15, 2013 reporting period for dissolved sulfate (4 wells) and dissolved arsenic (2 wells) have been addressed in the facility's January 23, 2013 permit application.

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. A total of 787,500 gallons from MSW Unit 3 have been solidified on-site and placed in the landfill. Thirdly, leachate can be hauled off site for disposal. A total of 465,000 gallons from Unit 3 MSW, and 320,000 gallons from the CWU have been

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.

In addition to checked the waste profiles for the incoming DeQuoin MGP remediation site waste, I asked Mr. Bryant via e-mail for the total amounts of MGP waste for the last reporting period and the waste profiles for each. A total of 26,145.7 tons of waste from 7 different remediation projects were accepted at the CWU. The waste profiles provided indicated all the wastes were characteristically non-hazardous. When Toxicity testing was done, none of the wastes exceeded the TCLP limits for toxicity.

### **Summary of Apparent Violations**

No violations were noted during the inspection



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Illinois Environmental Protection Agency  
Bureau of Land

## ***DIGITAL PHOTOGRAPHS***

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

DATE: June 10, 2013  
TIME: 10:15AM-11:20AM  
DIRECTION: South  
PHOTO by: Dustin Burger  
PHOTO FILE NAME:  
0390055036 -06102013-001.jpg  
COMMENTS: Active area



DATE: June 10, 2013  
TIME: 10:15AM-11:20AM  
DIRECTION: South  
PHOTO by: Dustin Burger  
PHOTO FILE NAME:  
0390055036 -06102013-002.jpg  
COMMENTS: Active Area



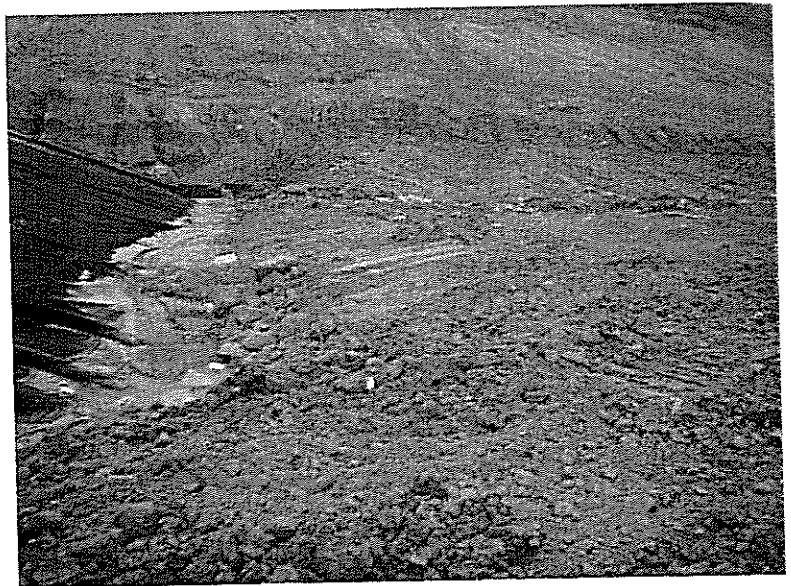


Illinois Environmental Protection Agency  
Bureau of Land

## ***DIGITAL PHOTOGRAPHS***

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

**DATE:** June 10, 2013  
**TIME:** 10:15AM-11:20AM  
**DIRECTION:** North  
**PHOTO by:** Dustin Burger  
**PHOTO FILE NAME:**  
0390055036-06102013-003.jpg  
**COMMENTS:** Protective layer over  
Cell 5A floor drainage system



**DATE:** June 10, 2013  
**TIME:** 10:15AM-11:20AM  
**DIRECTION:** Southwest  
**PHOTO by:** Dustin Burger  
**PHOTO FILE NAME:**  
0390055036-06102013-004.jpg  
**COMMENTS:** Cell 5A looking east  
from toe of sidewall



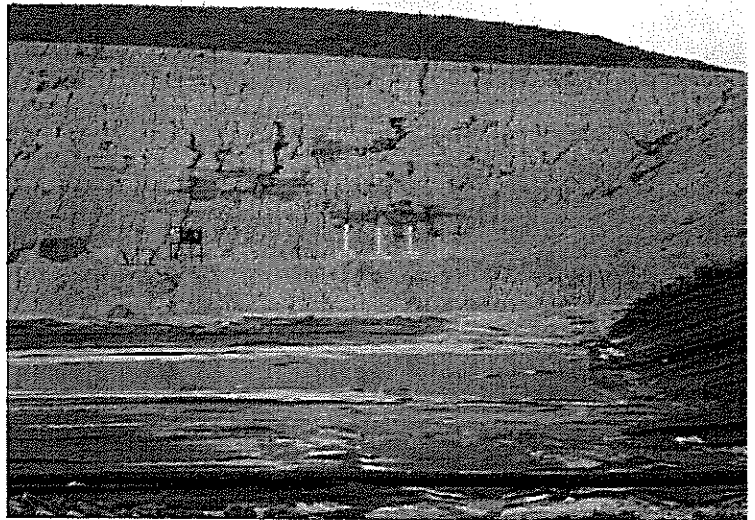


Illinois Environmental Protection Agency  
Bureau of Land

## ***DIGITAL PHOTOGRAPHS***

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

DATE: June 10, 2013  
TIME: 10:15AM-11:20AM  
DIRECTION: South  
PHOTO by: Dustin Burger  
PHOTO FILENAME:  
0390055036~06102013-005.jpg  
COMMENTS: Temporary monitoring  
wells south of 5A



DATE: June 10, 2013  
TIME: 10:15AM-11:20AM  
DIRECTION: South  
PHOTO by: Dustin Burger  
PHOTO FILENAME:  
0390055036~06102013-006.jpg  
COMMENTS: Temporary monitoring  
wells south of 5A





Illinois Environmental Protection Agency  
Bureau of Land

## DIGITAL PHOTOGRAPHS

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

DATE: June 10, 2013  
TIME: 10:15AM-11:20AM  
DIRECTION: west  
PHOTO by: Dustin Burger  
PHOTO FILENAME  
0390055036~06102013-007.jpg  
COMMENTS: Leachate extraction  
lines on sidewall of cell 5A



DATE: June 10, 2013  
TIME: 10:15AM-11:20AM  
DIRECTION: South  
PHOTO by: Dustin Burger  
PHOTO FILENAME  
0390055036~06102013-008.jpg  
COMMENTS: Close-up of monitoring  
well cluster





Illinois Environmental Protection Agency  
Bureau of Land

## ***DIGITAL PHOTOGRAPHS***

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

DATE: June 10, 2013  
TIME: 10:15AM-11:20AM  
DIRECTION: South  
PHOTO by: Dustin Burger  
PHOTO FILENAME  
0390055036~06102013-009.jpg  
COMMENTS: Chemical Waste Unit  
(CWU) overview shot



DATE: June 10, 2013  
TIME: 10:15AM-11:20AM  
DIRECTION: South  
PHOTO by: Dustin Burger  
PHOTO FILENAME  
0390055036~06102013-010.jpg  
COMMENTS: CWU





Illinois Environmental Protection Agency  
Bureau of Land

## ***DIGITAL PHOTOGRAPHS***

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

DATE: June 10, 2013  
TIME: 10:15AM-11:20AM  
DIRECTION: South  
PHOTO by: Dustin Burger  
PHOTO FILENAME  
0390055036~06102013-011.jpg  
COMMENTS: CWU. Note protective  
plastic layer to divert stormwater from  
entering leachate system on unused  
portion of CWU.



# 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

Clinton Landfill No. 3 MSW Leachate Storage Tank 35,000 Gallon		Clinton Landfill No. 3 MSW Leachate Recirculated Storage Tank Not Applicable		Clinton Landfill No. 3 MSW Leachate Storage Tank 35,000 Gallon		Clinton Landfill No. 3 CWU Leachate Storage Tank 35,000 Gallon	
<i>Date</i>	<i>CLI #3 MSW Solidified On site</i>	<i>Date</i>	<i>CLI #3 MSW Recirculated On Site</i>	<i>Date</i>	<i>CLI #3 MSW Hauled Off Site (BNWRD)</i>	<i>Date</i>	<i>CLI #3 CWU Hauled Off Site (PDC1)</i>
<b>Total</b>	<b>787,500</b>	<b>Total</b>	<b>0</b>	<b>Total</b>	<b>465,000</b>	<b>Total</b>	<b>320,000</b>
<b>Grand Total</b>							
<b>1,572,500</b>							





SOURCE MATERIAL TO CWU

Account	Approval Date	Waste	Tons	Landfill	Status
66-2	3/31/2011	Ameren Quincy Source	2,042.00	CWU	Completed
66-3	6/15/2011	Ameren Mattoon Source Material	16,092.71	CWU	Completed
66-6	9/8/2011	ComEd Dixon Source Material	109.80	CWU	Completed
66-8	10/17/2011	Ameren Clinton Source Material	2,295.95	CWU	Completed
66-7	10/17/2011	Ameren Clinton Demo Debris Source	92.60	CWU	Completed
66-9	11/28/2011	ComEd Lockport Source Material	2,586.28	CWU	Completed
66-12	1/14/2013	ComEd Rockford Source Material	1,497.48	CWU	On-going
66-16	3/26/2013	ComEd DuQuoin Source Material	1,428.88	CWU	On-going



PEORIA DISPOSAL COMPANY  
RECEIVED ON: 4-1-11  
BY: [Signature]  
PERMIT SPECIALIST  
DISPOSAL FACILITY: CWU only  
FORMER PERMIT #: n/a

\*\*\*\*CWU\*\*\*\*

FOR OFFICE USE
Permit# <u>66-002</u>
Poll. Control: <input checked="" type="radio"/> N
Sales I.D.# _____
New or Existing Cust. _____
Cert Permit # _____

### Non-Special Waste Certification

Generator AMEREN SERVICES  
Address 800 JERSEY STREET  
City, St, Zip QUINCY, IL 62301  
Waste Name MGP REMEDIATION WASTE  
Invoicing Contact DON RICHARDSON Company AMEREN SERVICES  
Address PO BOX 66149 City, St, Zip ST. LOUIS, MO Phone# 314-554-4867

22.48 a. This is to certify that the industrial process waste or pollution control waste described herein is outside the scope of categories listed in subdivision (1) of subsection (c) of Section 3.475 (renumbered 6-26-2002) of the Illinois Environmental Protection Act. Specifically, the subject waste:

- Is not hazardous
- Is not a liquid
- Is not a regulated asbestos-containing material
- Does not contain PCBs regulated in accordance with 40 Code of Federal Regulations, Part 761
- Is not formerly hazardous waste rendered non-hazardous and is not subject to the waste analysis and recordkeeping requirements of Section 728.107 of Title 35 of the Illinois Administrative Code under the land disposal restrictions of Part 728
- Does not result from shredding recyclable metals and is not required to be managed as a special waste under Section 22.29 of the Act

Section 22.48 further provides that each of the following items is required for determination that the waste is not a special waste and must be responded to:

22.48 b. 1. The means by which the generator has determined that the waste is not a hazardous waste. (Check where appropriate)

- A review of Illinois Title 35, Section 721, Identification and Listing of Hazardous Waste.
- Analysis of the waste. (Attached)
- Knowledge of the waste.
- MSDS (Attached)
- Other: \_\_\_\_\_

22.48 b. 2. The means by which the generator has determined that the waste is not a liquid. (Check where appropriate).

- Is not a liquid, as determined using the paint filter test set forth in subdivision (3) (A) of subsection (m) of Section 811.107 of Title 35 of the Illinois Administrative Code.
- Is a liquid, as determined using the paint filter test set forth in subdivision (3) (A) of subsection (m) of Section 811.107 of Title 35 of the Illinois Administrative Code.

22.48 b. 3. If the waste undergoes testing, the analytical results obtained from testing, signed and dated by the person responsible for completing the analysis.

- The waste has undergone testing and the analysis is attached.
- The waste has not undergone testing.

22.48 b. 4. If the waste does not undergo full characterization testing, an explanation as to why no testing, or only partial characterization testing, is needed.

- Knowledge of the waste.
- Material Safety Data Sheets.
- Other (provide explanation): \_\_\_\_\_

22.48 b. 5. A description of the process generating the waste. (Please respond in detail) \_\_\_\_\_

Manufactured gas plant site remediation of process residuals and contaminated soil and debris.

22.48 b. 6. Relevant Material Safety Data Sheets (Must attach, if available):

Other: \_\_\_\_\_

Will this waste be commingled with any other waste?  Yes  No

If yes, specify with what waste it will be commingled: \_\_\_\_\_ Container ID # \_\_\_\_\_

Annual Volume: 10,000 cu. yds. Type (i.e. roll-offs, drums) dump trailers

Disposal Frequency:  One-time project  On-going

The signatures transmitted by facsimile machine shall be treated in all manner and respects as an ORIGINAL document and shall be considered to have the same binding legal effect as an ORIGINAL document. I hereby agree that I shall not raise as a defense to the formation of this Non-special Waste Certification Form the fact that the signature was transmitted through the use of a facsimile machine.

I certify under penalty of law that I personally have examined this certification and am familiar with the waste through analysis and testing or through knowledge of the process to support this certification. I believe that the information submitted is true, accurate, and complete. I understand that a person who knowingly and falsely certifies that a waste is not special waste is subject to the penalties in subdivision (6) of subsection (b) of Section 44 of the Illinois Environmental Protection Act.

Signature David Pluhar  
Name David Pluhar  
Title Principal  
Date 3/31/2011



**PDC Laboratories, Inc.**  
 P.O. Box 9071 • Peoria, IL 61612-9071  
 (309) 692-9693 • (800) 752-6851 • FAX (309) 692-3789



Clinton Landfill  
 4349 Southport Rd  
 Peoria, IL 61615  
 Attn: Jenny Hinton

Date Received: 03/29/11 8:55  
 Report Date: 04/01/11  
 Customer #: 280105

Sample No: 1032785-01  
 Sample Description: AMEREN MGP SAMPLE

Collect Date: 03/28/11 16:30  
 Matrix: Solid Grab

Parameters	Result	Qual	Analysis Date	Analyst	Method
<u>General Chemistry - PIA</u>					
Cyanide - reactive	< 1.6 mg/kg	R	03/30/11 15:25	TTH	SW 9010B - 9012A - 7.3.3.2
Flashpoint closed	>200 °F		03/31/11 09:55	WRW	SW 1010 - ASTM D83-80
Paint Filter	Pass		03/29/11 15:17	WRW	SW 9085A
pH	8.62 pH Units		04/01/11 08:21	WRW	SW 9045C
Solids - total solids (TS)	76 %		03/30/11 11:19	BRS	SM 2540G 18Ed
Reactive Sulfide	< 20 mg/kg		04/01/11 11:30	JRL2	SW 9034 B 7.3.4.1

# 66-2



**PDC Laboratories, Inc.**  
 P.O. Box 937 • Peoria, IL 61612-9671  
 (309) 692-9533 • (800) 732-6651 • FAX (309) 692-9680



Clinton Landfill  
 4349 Southport Rd  
 Peoria, IL 61615  
 Attn: Jenny Hinton

Date Received: 03/29/11 8:55  
 Report Date: 04/01/11  
 Customer #: 280105

**Notes**

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 NELAC Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100230  
 Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 17553  
 Drinking Water Certifications: Kansas (E-10338); Missouri (870); Wisconsin (998284430); Indiana (C-IL-040); Iowa (240)  
 Wastewater Certifications: Arkansas (88-0677); Wisconsin (998284430); Iowa (240); Kansas (E-10335)  
 Hazardous/Solid Waste Certifications; Arkansas (88-0677); Wisconsin (998284430); Iowa (240); Kansas (E-10335)  
 UST Certification; Iowa (240)
- SPM PDC Laboratories - Springfield, MO  
 EPA DMR-QA Program
- STL PDC Laboratories - St. Louis, MO  
 NELAC Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing

R MSMSD Failed RPD

Certified by: Lisa Y. Grant, Project Manager







PEORIA DISPOSAL COMPANY  
RECEIVED ON: 6-15-11  
BY: [Signature]  
PERMIT SPECIALIST  
DISPOSAL FACILITY: Cell only  
FORMER PERMIT #: 1/1

\*\*\*\*CWU\*\*\*\*

**Non-Special Waste Certification**

FOR OFFICE USE
Permit# 66-003
Poll. Control: <input checked="" type="checkbox"/> N
Sales ID.# 9123
New or Existing Cust.
Cert Permit #

Generator Ameren CIPS

Address 212 North 14<sup>th</sup> Street, Mattoon, IL 61938

City,St,Zip Mattoon, IL 61938

Waste Name MGP Remediation Waste

Invoicing Contact Don Richardson Company Ameren Services

Address One Ameren Plaza, 1901 Chouteau Ave. PO Box 66149  
City,St,Zip St. Louis, MO 63166-66149 Phone# (314) 554-4867

22.48 a. This is to certify that the industrial process waste or pollution control waste described herein is outside the scope of categories listed in subdivision (1) of subsection (c) of Section 3.475 (renumbered 6-26-2002) of the Illinois Environmental Protection Act. Specifically, the subject waste:

- Is not hazardous
- Is not a liquid
- Is not a regulated asbestos-containing material
- Does not contain PCBs regulated in accordance with 40 Code of Federal Regulations, Part 761
- Is not formerly hazardous waste rendered non-hazardous and is not subject to the waste analysis and recordkeeping requirements of Section 728.107 of Title 35 of the Illinois Administrative Code under the land disposal restrictions of Part 728
- Does not result from shredding recyclable metals and is not required to be managed as a special waste under Section 22.29 of the Act

Section 22.48 further provides that each of the following items is required for determination that the waste is not a special waste and must be responded to:

22.48 b. 1. The means by which the generator has determined that the waste is not a hazardous waste. (Check where appropriate)

- A review of Illinois Title 35, Section 721, Identification and Listing of Hazardous Waste.
- Analysis of the waste. (Attached)
- Knowledge of the waste.
- MSDS (Attached)
- Other: \_\_\_\_\_

22.48 b. 2. The means by which the generator has determined that the waste is not a liquid. (Check where appropriate).

- Is not a liquid, as determined using the paint filter test set forth in subdivision (3) (A) of subsection (m) of Section 811.107 of Title 35 of the Illinois Administrative Code.
- Is a liquid, as determined using the paint filter test set forth in subdivision (3) (A) of subsection (m) of Section 811.107 of Title 35 of the Illinois Administrative Code.

22.48 b. 3. If the waste undergoes testing, the analytical results obtained from testing, signed and dated by the person responsible for completing the analysis.

- The waste has undergone testing and the analysis is attached.
- The waste has not undergone testing.

22.48 b. 4. If the waste does not undergo full characterization testing, an explanation as to why no testing, or only partial characterization testing, is needed.

- Knowledge of the waste.
- Material Safety Data Sheets.
- Other (provide explanation): \_\_\_\_\_

22.48 b. 5. A description of the process generating the waste. (Please respond in detail) \_\_\_\_\_

Remediation of Former Manufactured Gas Plant

22.48 b. 6. Relevant Material Safety Data Sheets (Must attach, if available):

Other: \_\_\_\_\_

Will this waste be commingled with any other waste?  Yes  No

If yes, specify with what waste it will be commingled: \_\_\_\_\_ Container ID # \_\_\_\_\_

Annual Volume: 5,000 Type (i.e. roll-offs, drums) trailers

Disposal Frequency:  One-time project  On-going

The signatures transmitted by facsimile machine shall be treated in all manner and respects as an ORIGINAL document and shall be considered to have the same binding legal effect as an ORIGINAL document. I hereby agree that I shall not raise as a defense to the formation of this Non-special Waste Certification Form the fact that the signature was transmitted through the use of a facsimile machine.

I certify under penalty of law that I personally have examined this certification and am familiar with the waste through analysis and testing or through knowledge of the process to support this certification. I believe that the information submitted is true, accurate, and complete. I understand that a person who knowingly and falsely certifies that a waste is not special waste is subject to the penalties in subdivision (6) of subsection (h) of Section 44 of the Illinois Environmental Protection Act.

Signature 

Name Brad Rucker

Title Project Manager

Date 03-08-2011



PLM Inc. 2011-11-15

2011

net c

Clinton Landfill  
4349 Southport Rd  
Peoria, IL 61615  
Attn: Jenny Hinton

Date Received: 06/11/11 10:00  
Report Date: 06/14/11  
Customer #: 280105

Sample No: 1061250-01  
Sample Description: MGP-WC2

Collect Date: 06/10/11 10:30  
Matrix: Solid Composite

Ameren - Mattoon -

Parameters	Result	Qual	Analysis Date	Analyst	Method
<b>General Chemistry - PIA</b>					
Flashpoint closed	>200 °F		06/14/11 12:06	WRW	SW 1010 - ASTM D93-80

#106-3



PDC Laboratories, Inc.  
 2100 S. W. 10th St., Suite 100  
 Ft. Lauderdale, FL 33304



Clinton Landfill  
 4349 Southport Rd  
 Peoria, IL 61615  
 Attn: Jenny Hinton

Date Received: 06/11/11 10:00  
 Report Date: 06/14/11  
 Customer #: 280105

**Notes**

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 Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 17553  
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 Wastewater Certifications: Arkansas (88-0677); Wisconsin (898284430); Iowa (240); Kansas (E-10335)  
 Hazardous/Solid Waste Certifications: Arkansas (88-0677); Wisconsin (898284430); Iowa (240); Kansas (E-10335)  
 UST Certification; Iowa (240)
- SPM PDC Laboratories - Springfield, MO  
 EPA DMR-QA Program
- STL PDC Laboratories - St. Louis, MO  
 NELAC Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing

Certified by: Lisa Y. Grant, Project Manager





**PDC Laboratories, Inc.**  
 1000 E. 9th St. • Peoria, IL 61611-9971  
 (309) 691-9999 • (309) 782-5551 • FAX (309) 692-0688



Clinton Landfill  
 4349 Southport Rd  
 Peoria, IL 61615  
 Attn: Jenny Hinton

Date Received: 05/20/11 9:50  
 Report Date: 06/02/11  
 Customer #: 280105

Sample No: 1052206-01  
 Sample Description: MGP-WC

Collected Date: 05/16/11 14:00  
 Matrix: Solid Composite

Ameren - Mattoon -

Parameters	Result	Qual	Analysis Date	Analyst	Method
<b>General Chemistry - PIA</b>					
Cyanide - reactive	< 1.9 mg/kg		05/24/11 16:21	TTH	SW 9010B - 9012A - 7.3.3.2
Flashpoint closed	78 °F		05/26/11 13:08	WRW	SW 1010 - ASTM D93-60
Paint Filter	Pass		05/24/11 11:27	WRW	SW 9095A
pH	12.0 pH Units	H	05/28/11 13:58	WRW	SW 9045C
Reactive Sulfide	< 20 mg/kg		05/23/11 08:58	PLI	SW 9034 & 7.3.4.1
Solids - total solids (TS)	78 %		05/23/11 16:20	BRS	SM 2540G 16Ed







PEORIA DISPOSAL COMPANY  
RECEIVED ON: 9-8-11  
BY: Jenny Gordon  
PERMIT SPECIALIST  
DISPOSAL FACILITY: Chil  
FORMER PERMIT #: n/a

Billing # 08-36696  
FOR OFFICE USE  
Permit# 166-06 66-07  
Poll. Control:  Y  N  
Sales I.D.# 9416  
New or Existing Cust.  
Cert Permit # \_\_\_\_\_

\*\*\*\*CWU\*\*\*\*

### Non-Special Waste Certification

Generator Commonwealth Edison Co. Dixon 2nd St. Former MGP  
Address 321 W. 2nd St.  
City,St,Zip Dixon, Lee County, Illinois 61021  
Waste Name Dixon 2nd St. non-special waste (soil, source material + debris) *9/17/11*  
Invoicing Contact Ann H. Collins Company RW Collins  
Address 7225 W. 66th Street City,St,Zip Chicago, IL 60638 Phone# 708.458.6868

22.48 a. This is to certify that the industrial process waste or pollution control waste described herein is outside the scope of categories listed in subdivision (1) of subsection (c) of Section 3.475 (renumbered 6-26-2002) of the Illinois Environmental Protection Act. Specifically, the subject waste:

- Is not hazardous
- Is not a liquid
- Is not a regulated asbestos-containing material
- Does not contain PCBs regulated in accordance with 40 Code of Federal Regulations, Part 761
- Is not formerly hazardous waste rendered non-hazardous and is not subject to the waste analysis and recordkeeping requirements of Section 728.107 of Title 35 of the Illinois Administrative Code under the land disposal restrictions of Part 728
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- Analysis of the waste. (Attached)
- Knowledge of the waste.
- MSDS (Attached)
- Other: \_\_\_\_\_

22.48 b. 2. The means by which the generator has determined that the waste is not a liquid. (Check where appropriate).

- Is not a liquid, as determined using the paint filter test set forth in subdivision (3) (A) of subsection (m) of Section 811.107 of Title 35 of the Illinois Administrative Code.
- Is a liquid, as determined using the paint filter test set forth in subdivision (3) (A) of subsection (m) of Section 811.107 of Title 35 of the Illinois Administrative Code.

22.48 b. 3. If the waste undergoes testing, the analytical results obtained from testing, signed and dated by the person responsible for completing the analysis.

- The waste has undergone testing and the analysis is attached.
- The waste has not undergone testing.

22.48 b. 4. If the waste does not undergo full characterization testing, an explanation as to why no testing, or only partial characterization testing, is needed.

- (X) Knowledge of the waste.  
( ) Material Safety Data Sheets.  
(X) Other (provide explanation): Further analysis of waste conducted by PDC.

22.48 b. 5. A description of the process generating the waste. (Please respond in detail) \_\_\_\_\_

Environmental remediation of a former manufactured gas plant located  
in Dixon, Illinois.

22.48 b. 6. Relevant Material Safety Data Sheets (Must attach, if available):

Other: \_\_\_\_\_

Will this waste be commingled with any other waste?  Yes  No

If yes, specify with what waste it will be commingled: \_\_\_\_\_ Container ID # \_\_\_\_\_

Annual Volume: 200 Tons Type (i.e. roll-offs, drums) Dumptrucks

Disposal Frequency:  One-time project  On-going

The signatures transmitted by facsimile machine shall be treated in all manner and respects as an ORIGINAL document and shall be considered to have the same binding legal effect as an ORIGINAL document. I hereby agree that I shall not raise as a defense to the formation of this Non-special Waste Certification Form the fact that the signature was transmitted through the use of a facsimile machine.

I certify under penalty of law that I personally have examined this certification and am familiar with the waste through analysis and testing or through knowledge of the process to support this certification. I believe that the information submitted is true, accurate, and complete. I understand that a person who knowingly and falsely certifies that a waste is not special waste is subject to the penalties in subdivision (6) of subsection (h) of Section 44 of the Illinois Environmental Protection Act.

Signature Gail E MacMillan

Name Ms. Gail MacMillan

Title Sr. Remediation Project Manager

Date September 1, 2011



**PDC Laboratories, Inc.**  
 P.O. Box 8071 • Peoria, IL 61619-8071  
 (309) 692-9552 • (309) 752-6451 • FAX (309) 692-9669



Stantec  
 446 Eisenhower Lane North  
 Lombard, IL 60148  
 Attn: Jonathan Pugh

Date Received: 08/27/11 9:45  
 Report Date: 09/02/11  
 Customer #: 263776

Sample No: 1088300-01  
 Sample Description: TX-AC11-645-800-0  
 DIXON 2ND ST. MGP -

Collect Date: 08/26/11 13:00  
 Matrix: Solid Grab

Parameters	Result	Qual	Analysis Date	Analyst	Method
<b>General Chemistry - PIA</b>					
Cyanide - reactive	< 2.6 mg/kg dry		09/02/11 11:50	lgth	SW 8010B - 9012A - 7.3.3.2
Flashpoint closed	>200 °F		09/01/11 12:55	WRW	SW 1010 - ASTM D83-80
Paint Filter	Pass		08/30/11 07:39	WRW	SW 9085A
pH	8.39 pH Units	H	08/30/11 08:08	WRW	SW 9045C
Reactive Sulfide	< 26 mg/kg dry		08/30/11 10:30	TAS	SW 9034 & 7.3.4.1
Solids - total solids (TS)	78 %		08/30/11 07:56	BNS	SM 2540G 18Ed

#Lele-6  
 66-09



**PDC Laboratories, Inc.**  
 P.O. Box 9377 • Peoria, IL 61612-9071  
 (309) 682-9698 • (800) 752-6651 • FAX (309) 692-9389



Stantec  
 446 Eisenhower Lane North  
 Lombard, IL 60148  
 Attn: Jonathan Pugh

Date Received: 08/27/11 9:45  
 Report Date: 09/02/11  
 Customer #: 263776

**Notes**

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 Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 17553  
 Drinking Water Certifications: Kansas (E-10338); Missouri (870); Wisconsin (998284430); Indiana (C-IL-040); Iowa (240)  
 Wastewater Certifications: Arkansas (88-0677); Wisconsin (998284430); Iowa (240); Kansas (E-10335)  
 Hazardous/Solid Waste Certifications: Arkansas (88-0877); Wisconsin (998284430); Iowa (240); Kansas (E-10335)  
 UST Certification; Iowa (240)
- SPM PDC Laboratories - Springfield, MO  
 EPA DMR-QA Program
- STL PDC Laboratories - St. Louis, MO  
 NELAC Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through KS EPA Lab No. E-10389

H Test performed after the expiration of the appropriate regulatory/advisory maximum allowable hold time.

Certified by: Erin M. Lane For Kurt C. Stapping, Senior Project Manager





PDC Laboratories, Inc.



Union Electric Co. D/B/A Ameren Missouri  
1901 Chouteau Ave  
St. Louis, MO 63103  
Attn: Charles Klumb

Date Received: 10/05/11 14:44  
Report Date: 10/12/11  
Customer #: 276174  
PO#: 556444

Sample No: 1100651-01  
Sample Description: S-1 (8-8.5')

Collect Date: 10/04/11 10:45  
Matrix: Solid

Parameters	Result	Qual	Analysis Date	Analyst	Method
<b>General Chemistry - PIA</b>					
Cyanide - reactive	< 2.0 mg/kg		10/11/11 11:38	lgth	SW 9010B - 9012A - 7.3.3.2
Flashpoint closed	>200 °F		10/10/11 11:42	WRW	SW 1010 - ASTM D93-80
Paint Filter	Pass		10/10/11 08:12	WRW	SW 8085A
pH	8.54 pH Units	H	10/10/11 08:40	WRW	SW 9045C
Reactive Sulfide	37 mg/kg		10/10/11 11:00	TAS	SW 9034 & 7.3.4.1
Solids - total solids (TS)	65 %		10/10/11 08:20	BNS	SM 2540G 18Ed

#66-7