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

November 5, 2014

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 October 20, 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,

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

Enclosure

4302 N. Main St., Rockford, IL 61103 (815)987-7760
595 S. State, Elgin, IL 60123 (847)608-3131
2125 S. First St., Champaign, IL 61820 (217)278-5800
2009 Mall St., Collinsville, IL 62234 (618)346-5120
9511 Harrison St., Des Plaines, IL 60016 (847)294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309)693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200
100 W. Randolph, Suite 11-300, Chicago, IL 60601 (312)814-6026

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: 10/20/2014 Time: From 10:00 To 11:00 Previous Inspection Date: 08/14/2014

Inspector(s): Dustin Burger. Kurt Niebergall Weather: Mostly clear, dry, 60s

No. of Photos Taken: # 13 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 47 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
		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.	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: October 20, 2014

10.	21(o)	CONDUCT A SANITARY LANDFILL OPERATION WHICH RESULTS IN ANY OF THE FOLLOWING CONDITIONS:	
	(1)	Refuse in Standing or Flowing Water	☐
	(2)	Leachate Flows Entering Waters of the State	☐
	(3)	Leachate Flows Exiting the Landfill Confines	☐
	(4)	Open Burning of Refuse in Violation of Section 9 of the Act	☐
	(5)	Uncovered Refuse Remaining From Any Previous Operating Day or at the Conclusion of Any Operating Day	☐
	(6)	Failure to Provide Final Cover Within Time Limits	☐
	(7)	Acceptance of Wastes Without Necessary Permits	☐
	(8)	Scavenging as Defined by Board Regulations	☐
	(9)	Deposition of Refuse in Any Unpermitted Portion of the Landfill	☐
	(10)	Acceptance of Special Waste Without a Required Manifest	☐
	(11)	Failure to Submit Reports Required by Permits or Board Regulations	☐
	(12)	Failure to Collect and Contain Litter by the End of each Operating Day	☐
	(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 WASTE 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	☐

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	☐
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	☐
	(l)	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	
	(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	☐
35.	811.112	RECORDKEEPING REQUIREMENTS FOR MSWLF UNITS	
	(a)	Location Restriction Demonstration	☐
	(b)	Load Checking Requirements	☐
	(c)	Gas Monitoring Records	☐
	(d)	MSWLF Liquid Restriction Records	☐
	(e)	Groundwater Monitoring Program Requirements	☐
	(f)	Closure and Post Closure Care Requirements	☐
	(g)	Cost Estimates and Financial Assurance Requirements	☐
	PART 811 SUBPART C	PUTRESCIBLE AND CHEMICAL WASTE LANDFILLS	
36.	811.302	FACILITY LOCATION	
	(c)	Site Screening (Does Not Apply To Part 814-Subpart D Sites)	☐
37.	811.309	LEACHATE TREATMENT AND DISPOSAL SYSTEM	
	(a)	General Requirements	☐
	(c)	Standards for On-Site Treatment and Pretreatment	☐
	(d)	Standards for Leachate Storage System	☐
	(e)	Standards for Discharge to Off-Site Treatment	☐
	(f)	Standards for Leachate Recycling Systems	☐
	(g)	Standards for Leachate Monitoring Systems	☐
38.	811.310	LANDFILL GAS MONITORING (FOR SITES ACCEPTING PUTRESCIBLE WASTE)	
	(b)	Location and Design of Gas Monitoring Wells	☐
	(c)	Monitoring Frequency for Landfill Gas	☐
	(d)	Monitoring Parameters	☐
39.	811.311	LANDFILL GAS MANAGEMENT SYSTEM (FOR CHEMICAL AND PUTRESCIBLE LANDFILLS)	
	(a)	Conditions for Installation of Gas Management System	☐
	(b)	Notification and Implementation Requirements	☐
	(c)	Standards for Gas Venting	☐
	(d)	Standards for Gas Collection	☐

40.	811.312	LANDFILL GAS PROCESS AND DISPOSAL SYSTEM	
	(c)	No Unpermitted Gas Discharge	☐
	(d)	Gas Flow Rate Measurements into Treatment of Combustion Device	☐
	(e)	Standards for Gas Flares	☐
	(f)	Standards for On-Site Combustion of Landfill Gas Using Devices Other Than Flares	☐
	(g)	Gas Transported Off-Site	☐
41.	811.313	INTERMEDIATE COVER	
	(a)	Requirements for the Application for Intermediate Cover	☐
	(b)	Runoff and Infiltration Control	☐
	(c)	Maintenance of Intermediate Cover	☐
42.	811.314	FINAL COVER SYSTEM (DOES NOT APPLY TO PART 814 SITES THAT HAVE CLOSED, COVERED AND VEGETATED PRIOR TO SEPTEMBER 18, 1990)	
	(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.
4. The provisions of subsection (o) of Section 21 of the [Illinois] Environmental Protection Act shall be enforceable either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.
5. This inspection was conducted in accordance with Sections 4(c) and 4(d) of the [Illinois] Environmental Protection Act: 415 ILCS 5/4(c) and (d).
6. Items marked with an "NE" were not evaluated at the time of this inspection.

LPC #: 0390055036
Inspection Date: October 20, 2014

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

Illinois Environmental Protection Agency

Bureau of Land ♦ Field Operations Section ♦ Champaign

LPC#0390055036—DeWitt County
Clinton/Clinton Landfill #3
FOS File
October 20, 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 October 20, 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, accompanied me during the visit. Thirteen (13) photos were taken of Unit #3. The weather was mostly clear and temperatures in the 60s.

Site Inspection

When I arrived at the landfill I checked in at the landfill office. Mr. Bryant was out supervising the site, so I drove out to the landfill and located Mr. Bryant speaking with their consulting engineers as they supervised the construction of the recompacted clay liner for Section 5B.

During my last visit the facility had started construction of a new landfill cell designed 5B. The new cell is east of the current 5A, and includes a finger extending north to complete the last potion of Section 3. 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.

The workers were excavating the area to connect and tie the liner with the adjacent Cell 1C to the north. When clay is added, it is spread in six-inch lifts by a bulldozer with GPS units mounted on both ends of the blade. Water is added if needed to obtain optimum moisture content, and the clay is then compacted with sheeps foot rollers. Compaction testing is performed with a nuclear density device. Shelby tubes area also taken for testing at a geosciences lab to ensure the liner meets the hydraulic conductivity requirements (photos 1-2).

Mr. Bryant and I then drove to the liquid waste solidification area located on top of Cell 1C (photos 3-4). IEPA recently received a photo from a citizen showing a plume of white "fumes" from the landfill. The person asked what kind of gas was being released at the facility.

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 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. What is pictured in the photo is steam rising from the solidification unit. On cold days, especially if the is humidity is high, the steam from the warm water can be seen condensing in the air. During this inspection, steam can be seen in photo 3 rising from the solidification unit. When I asked Mr. Bryant how hot the liquid became, he said he thought it was 160-200 degrees.

I then looked at the active area, which was located in Cell 3B. The area was fairly small, with several trucks actively dumping while I watched. Three 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. A large pile of white fiberglass scraps from a shingle manufacturer is pictured in photos 5-6.

I then drove to the Chemical Waste Unit (CWU). The CWU had recently received a load of salt waste from 3M (photo 8). The landfill had made 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. No rain was forecast, but this is standard procedure for the facility.

Photo 9 pictures the CWU leachate load-out structure. 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.

Mr. Bryant and I then hiked back to the south sedimentation basin (photo 10). The stormwater it contained had been sampled and discharged in compliance with the facility's NPDES permit, so now the pond had 4-5 feet of freeboard. Mr. Bryant said he planned to clean out the sediment from the pond once the ground freezes.

The following is an excerpt from my previous inspection report regarding stormwater handling at the facility, but is repeated here since it still seems to be an issue.

The Clinton Landfill working group had questions about how stormwater is handled at the landfill. The south sedimentation pond receives stormwater runoff from the area around the CWU via perimeter ditches. In addition, stormwater collected in a small pond next to the CWU used to collect stormwater is also pumped into the perimeter ditch and flows into this sedimentation pond. The south sedimentation pond has an outfall which is closed by a valve, and an emergency overflow area where water can flow during excessive rain. The outfall, designated outfall 9, is sampled whenever the valve is opened to allow a discharge per the facility's National Discharge Elimination System (NPDES) stormwater permit issued by the Agency's Bureau of Water. I asked for the discharge reports for this outfall, and received them via e-mail from Mr. Welk on August 18, 2014. The sample analyses reports are also attached to the 8/14/14 report and indicate all discharges were within permitted parameters.

Waste in the CWU is covered with intermediate cover consisting of 12 inches of soil. Stormwater falling on the CWU either runs off the cover into the adjacent small stormwater pond, or soaks into the cover and waste and becomes leachate. The east half of the CWU still has not received waste and is covered with soil and a protective layer of plastic to keep stormwater from running into the leachate system. This stormwater and the stormwater collected by the small pond are pumped to the perimeter ditches and run into the south stormwater detention area.

Stormwater that penetrates the cover and becomes leachate is prevented from escaping by a flap and berm at the floor of the cell. The leachate is monitored and the results are submitted to the Agency. The annual report for the Year 2013 indicates that no organics were detected in the leachate extracted from the CWU. Mr. Bryant said the leachate actually meets Class 2 drinking water standards, although I did not compare the two.

Leachate from the CWU is collected by the leachate collection system and is pumped to a double-walled holding tank. The liquid is then trucked to PCD#1 for treatment in its wastewater system.

No MGP source material had been accepted since my last inspection, and is in fact now excluded from acceptance by a new permit issued by the Agency on July 31, 2014.

While at the site I also observed personnel collecting groundwater from a well on the west side of Unit 3. Each well has a designated bladder pump installed. The technicians use compressed nitrogen to power the bladder pump to collect a sample. An in-line instrument takes field reading for parameters such as pH, temperature, and specific conductance. Sample bottles are then filled for transport to the lab for analysis.

We then visited the scalehouse, where I checked the facility's special waste logs. The biggest quantity of liquid waste accepted by Clinton Landfill is still stormwater from a

MGP remediation site in LaSalle, Illinois.. The waste does not include actual MGP impacted soils or source material, but stormwater and/or groundwater that is pumped from the excavation allowing the workers to work in a dry hole. I reviewed the waste profiles of the waste and found it meets the permitted special waste classification in the facility's permit. The analysis of the waste indicated non-detects on most organic constituents, with 0.013 mg/l of Methyl-ethyl ketone (MEK) as the highest concentration of any organic. MEK is also a common laboratory contaminant. The water was mixed with three times the volume of ash to solidify the material.

Other special wastes included waste filter cake from DePue, pit sludge from the remediation at Bridgestone/Firestone in Decatur, alcohol catalyst from Equistar in Tuscola, and wastewater treatment sludges from Peoria Tube. One interesting waste received was rock crusher sludge from FL Smith. The waste is composed of mostly rock dust and water, but could contain minor amounts of oil from the machinery, so the company decided to dispose of the material at Clinton Landfill.

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 issued on July 31, 2014 is still the latest approved permit for the site.. 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 with the local siting for the CWU. As a field inspector, I did not have a part in the permitting process as it relates to local siting, and thus cannot discuss the revocation beyond what was mentioned in the July 31, 2014 letter. While I can give technical opinions on design, construction, and operation of the landfill, the Agency's Permit Section is responsible for the review of permits to make sure the local siting issues are resolved.

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.

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. In fact, the facility may finish the construction the new cell, but only ask for permission to operate part of the cell so it does not have to provide financial assurance for the whole area until it is needed.

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 July 3, 2014 report indicating exceedances from the 1st quarter sampling were confirmed. Alternate source demonstrations in the form of permit applications are currently under review for the exceedances that were confirmed, so no new permit applications are required unless exceedences are found that were not already addressed.

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

Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

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

DATE: October 20, 201414
TIME: 10:00-11:00 A.M.
DIRECTION: West
PHOTO by: Dustin Burger
PHOTO FILENAME:
0390055036~10202014-001.jpg
COMMENTS: New cell under construction

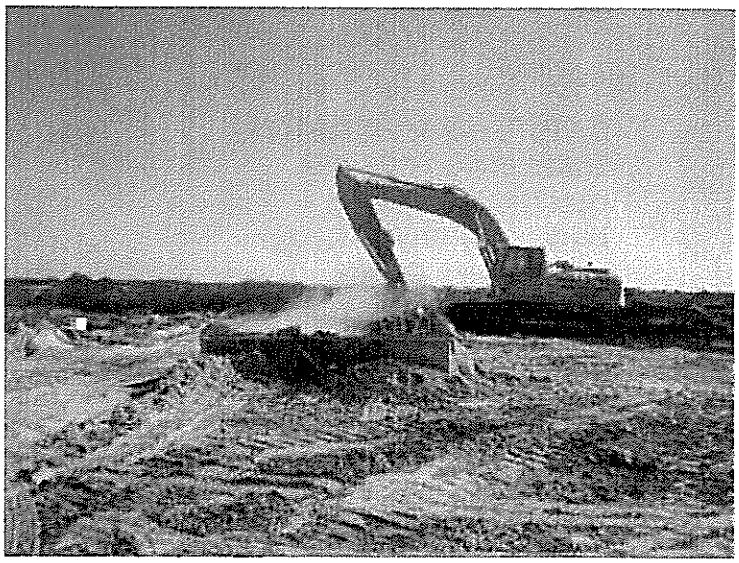
DATE: October 20, 2014
TIME: 10:00-11:00 A.M.
DIRECTION: Southwest
PHOTO by: Dustin Burger
PHOTO FILENAME:
0390055036~10202014-002.jpg
COMMENTS: Recompacted clay liner

Illinois Environmental Protection Agency
Bureau of Land

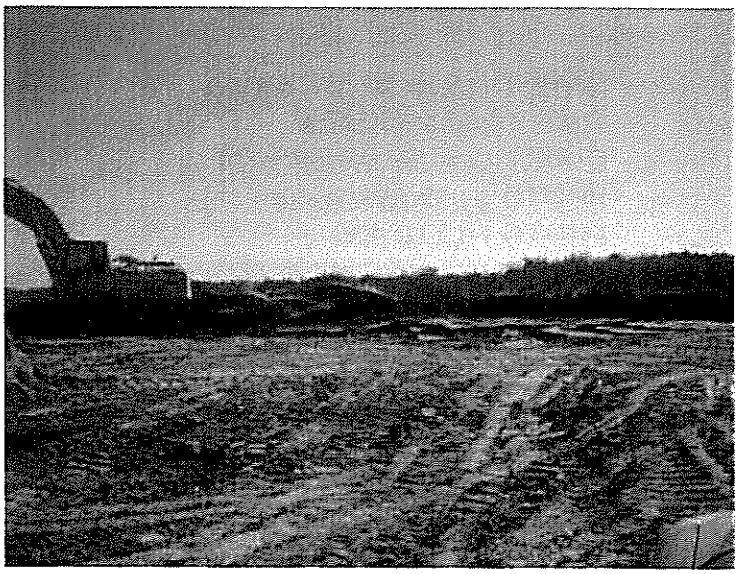
DIGITAL PHOTOGRAPHS

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

DATE: October 20, 2014
TIME: 10:00-11:00 A.M.
DIRECTION: East
PHOTO by: Dustin Burger
PHOTO FILENAME:
0390055036~10202014-003.jpg
COMMENTS: Solidification unit



DATE: October 20, 2014
TIME: 10:00-11:00 A.M.
DIRECTION: East
PHOTO by: Dustin Burger
PHOTO FILENAME:
0390055036~10202014-004.jpg
COMMENTS:



Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

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

DATE: October 20, 2014
TIME: 10:00-11:00 A.M.
DIRECTION: South
PHOTO by: Dustin Burger
PHOTO FILENAME:
0390055036~10202014-009.jpg
COMMENTS: CWU leachate load out

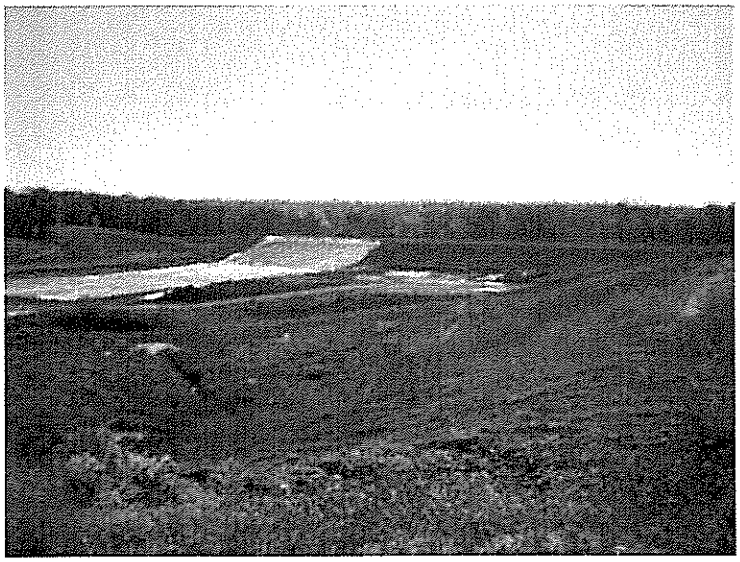
DATE: October 20, 2014
TIME: 10:00-11:00 A.M.
DIRECTION: East
PHOTO by: Dustin Burger
PHOTO FILENAME:
0390055036~10202014-010.jpg
COMMENTS: South detention basin

Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

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

DATE: October 20, 2014
TIME: 10:00-11:00 A.M.
DIRECTION: Southeast
PHOTO by: Dustin Burger
PHOTO FILE NAME:
0390055036~10202014-011.jpg
COMMENTS: CWU



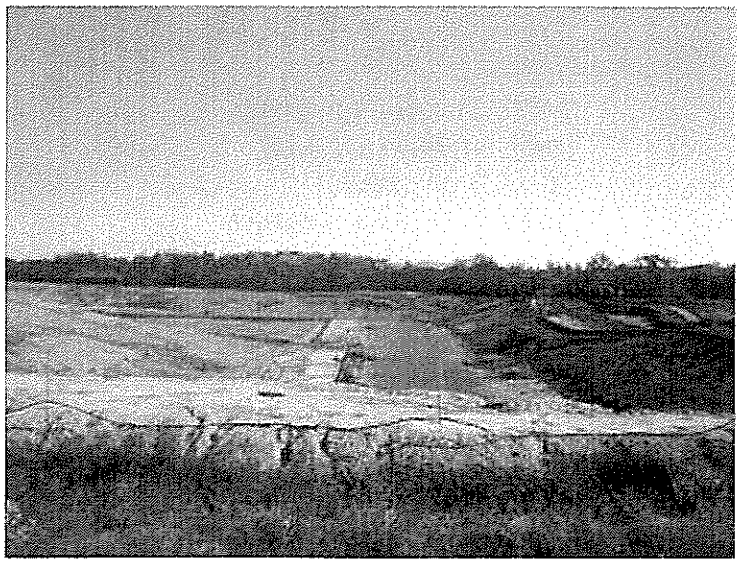
DATE: October 20, 2014
TIME: 10:00-11:00 A.M.
DIRECTION: North
PHOTO by: Dustin Burger
PHOTO FILE NAME:
0390055036~10202014-012.jpg
COMMENTS: Well being sampled

Illinois Environmental Protection Agency
Bureau of Land

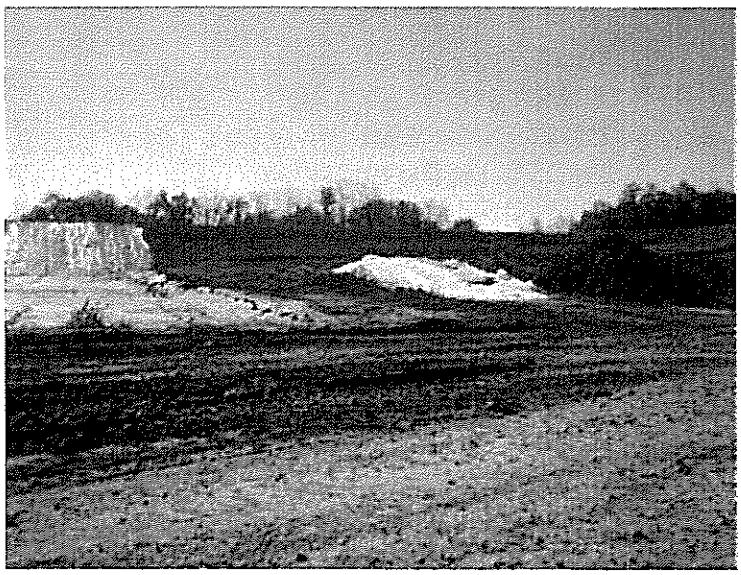
DIGITAL PHOTOGRAPHS

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

DATE: October 20, 2014
TIME: 10:00-11:00 A.M.
DIRECTION: East
PHOTO by: Dustin Burger
PHOTO FILE NAME:
0390055036~10202014-007.jpg
COMMENTS: new cell to left. Stormwater to right



DATE: October 20, 2014
TIME: 10:00-11:00 A.M.
DIRECTION: South
PHOTO by: Dustin Burger
PHOTO FILE NAME:
0390055036~10202014-008.jpg
COMMENTS: Chemical waste unit

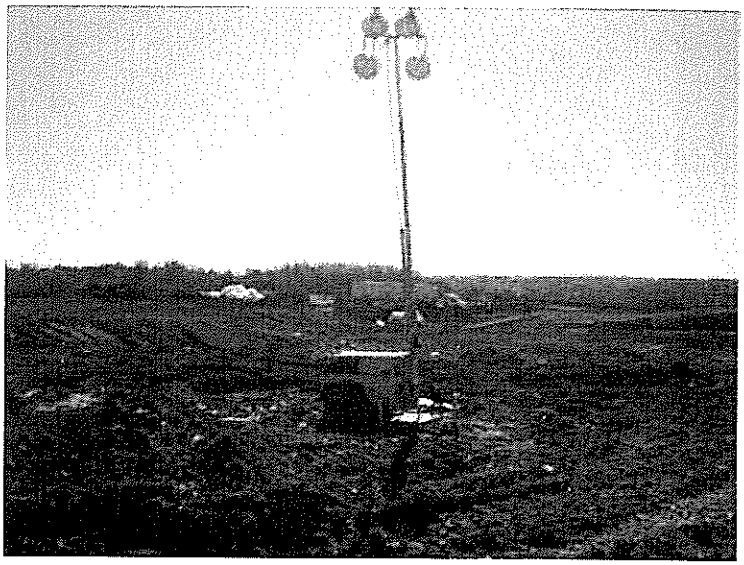


Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

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

DATE: October 20, 2014
TIME: 10:00-11:00 A.M.
DIRECTION: East
PHOTO by: Dustin Burger
PHOTO FILENAME:
0390055036~10202014-005.jpg
COMMENTS: active area



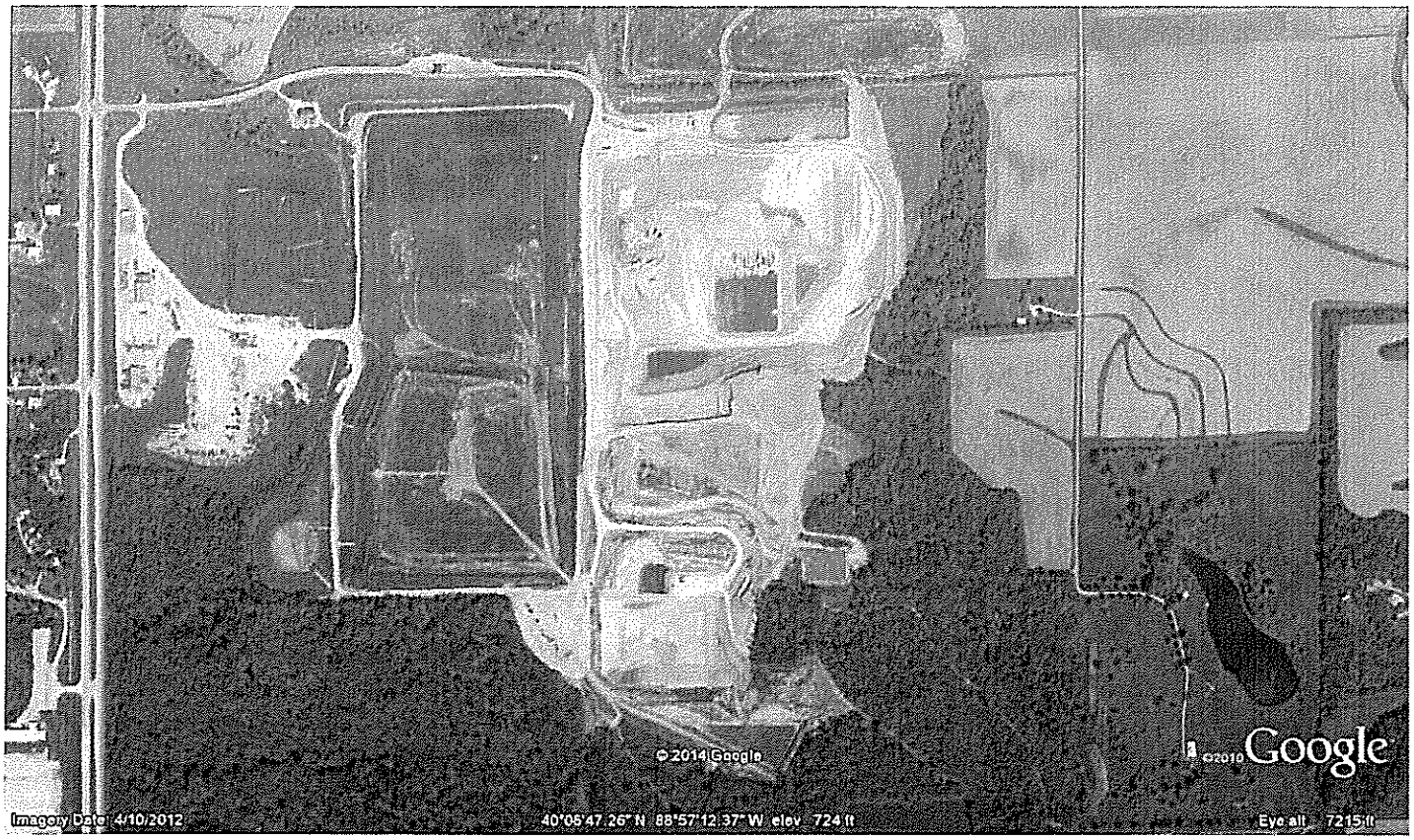
DATE: October 20, 2014
TIME: 10:00-11:00 A.M.
DIRECTION: SEast
PHOTO by: Dustin Burger
PHOTO FILENAME:
0390055036~10202014-006.jpg
COMMENTS: active area. White material is fiberglass strips.

Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

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

DATE: October 20, 2014
TIME: 10:00-11:00 A.M.
DIRECTION: North
PHOTO by: Dustin Burger
PHOTO FILE NAME:
0390055036~10202014-013.jpg
COMMENTS: Sampling monitoring wells


© 2014 Google
©2010 Google
Imagery Date: 4/10/2012 40°05'47.26" N 88°57'12.37" W elev 724 ft Eye alt 7215 ft

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

July 3, 2014

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. 45
Section VIII. Groundwater Monitoring
Special Condition 14

Dear Sir or Madam:

On behalf of Clinton Landfill, Inc. (CLI), PDC Technical Services, Inc. (PDC) is providing notification of apparent exceedances in groundwater quality at the Clinton Landfill No. 3 (Facility) for the April 15, 2014 reporting period, in accordance with the above-referenced permit condition. Table 1 is attached to show the wells, parameters, sample results, and the associated standards.

A number of apparent exceedances were generally consistent with results that have been identified and confirmed during one or more previous quarters. CLI submitted significant permit modification applications on November 2, 2013 (Log No. 2013-524) and on April 22, 2014 (Log No. 2014-152) to demonstrate that the parameter exceedances observed during the 2nd quarter 2013 and the 4th quarter 2014 sampling events, respectively, are attributable to a source other than the Facility. Application Log Nos. 2013-524 and 2014-152 are currently under review. The 1st quarter 2014 sample results for the parameters were observed to be consistent with or declining from previous results; therefore, CLI does not intend to follow the confirmation procedures of 35 IAC 811.319(a)(4)(B) in order to confirm the initial results for these parameters, as outlined in Table 1.

CLI will follow the confirmation procedures of 35 IAC 811.319(a)(4)(B) in order to confirm the remaining apparent exceedances, as outlined in Table 1.

Illinois Environmental Protection Agency

Bureau of Land • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

SOLID WASTE LANDFILL GROUNDWATER, LEACHATE, FACILITY AND GAS REPORTING FORM

This form must be used as a cover for the following list of notices and reports required to be submitted to the Illinois EPA's Bureau of Land, Permit Section. This form must be used for Solid Waste facilities only. Reporting for Hazardous Waste facilities should be submitted on a separate form. All reports submitted to the Illinois EPA's Bureau of Land Permit Section must contain an original, plus a minimum of two copies.

Note: This form is not to be used with permit applications. The facility's approved permit will state whether the document you are submitting is required as a report or an application.

Facility Name: Clinton Landfill No. 3 Site ID #: 0390055036

Facility Address: 9550 Heritage Rd, Clinton, IL 61727

Check the appropriate heading. Only one heading may be checked for each corresponding submittal. Check the appropriate sub-heading, where applicable. Attach the original and all copies behind this form.

☐ LPC-160 Forms

Groundwater	Leachate
___ Quarterly - Enter 1, 2, 3, or 4	___ Quarterly - Enter 1, 2, 3, or 4
☐ Semi-Annual	☐ Semi-Annual
☐ Annual	☐ Annual
☐ Biennial	☐ Biennial

☐ Well Construction Information

- ☐ Well Construction Forms, Boring Logs and/or Abandonment Forms
- ☐ Well Survey Data (e.g., Stick-up Elevation Data)

☐ Annual Groundwater Flow Evaluation

☐ Notice of Observed Increase in Groundwater

☑ Notice of Intent to Perform Confirmation Procedures (Re-sampling) in Groundwater

☐ Notice of Confirmed Increase of Groundwater Exceedence from Re-sample

☐ Notice of Methane Exceedences

☐ Annual Facility Report (per 35 Ill. Adm. Code 813.504) and Gas Monitoring Report

☐ Annual Certifications per 35 Ill. Adm. Code 813.501

☐ Other (identify)

Please contact the undersigned if you have any questions or need additional information.

Sincerely,
PDC Technical Services, Inc.

Joyce A. Day, P.G.
Senior Hydrogeologist
(309) 495-1562

Andrew Whelpley
Program Manager
(309) 495-1580

cc: Ron Welk/Jenny Hinton
David Bryant
File

TABLE 1
Clinton Landfill No. 3
Apparent Exceedances for 1st Quarter 2014

Well	Parameter	Units	Initial Result	Interwell AGQS/MAPC	Resample?*
ROXANA SILT/ROBEIN MEMBER WELLS					
G02R#	Nitrate-N, Dissolved	mg/L	17	0.06	No
G04R#	Nitrate-N, Dissolved	mg/L	9.9	0.06	No
G08R	Nitrate-N, Dissolved	mg/L	3.3	0.06	No
G09R	Arsenic, Dissolved	ug/L	15	11	No
G09R	Nitrate-N, Dissolved	mg/L	2.7	0.06	No
G20R	Magnesium, Dissolved	mg/L	150	101.4	No
G20R	Nitrate-N, Dissolved	mg/L	6.7	0.06	No
G20R	Solids - total dissolved solids (TDS)	mg/L	2800	946.5	No
G20R	Sulfate, Dissolved	mg/L	1300	156.6	No
G24R	Nitrate-N, Dissolved	mg/L	0.13	0.06	No
G25R	Solids - total dissolved solids (TDS)	mg/L	1200	946.5	Yes
G25R	Sulfate, Dissolved	mg/L	390	156.6	No
G26R	Solids - total dissolved solids (TDS)	mg/L	1000	946.5	No
G26R	Sulfate, Dissolved	mg/L	370	156.6	No
G31R	Nitrate-N, Dissolved	mg/L	7.6	0.06	No
G47R	Boron, Dissolved	ug/L	570	565.5	Yes
G47R	Nitrate-N, Dissolved	mg/L	6.9	0.06	No
G48R	Nitrate-N, Dissolved	mg/L	0.41	0.06	No
G48R	Sulfate, Dissolved	mg/L	220	156.6	No
G49R	Solids - total dissolved solids (TDS)	mg/L	1000	946.5	No
G49R	Sulfate, Dissolved	mg/L	380	156.6	No
G58R#	Sulfate, Dissolved	mg/L	190	156.6	No
G59R	Nitrate-N, Dissolved	mg/L	0.62	0.06	No
G59R	Solids - total dissolved solids (TDS)	mg/L	990	946.5	No
G59R	Sulfate, Dissolved	mg/L	420	156.6	No
R16R	Nitrate-N, Dissolved	mg/L	19	0.06	No
R17R#	Nitrate-N, Dissolved	mg/L	5.7	0.06	No
UPPER RADNOR TILL SAND WELLS					
G07S#	Arsenic, Dissolved	ug/L	170	125.4	Yes
G49S	Chloride, Dissolved	mg/L	15	8.5	No
G49S	Nitrate-N, Dissolved	mg/L	0.83	0.29	No
G49S	Solids - total dissolved solids (TDS)	mg/L	920	692.7	No
G49S	Specific Conductance, Field Measured	umhos/cm	1180	1108.7	No
G49S	Sulfate, Dissolved	mg/L	350	8.4	No
G50S	Sulfate, Dissolved	mg/L	31	8.4	Yes
G54S	Nitrate-N, Dissolved	mg/L	0.62	0.29	Yes
G54S	Sulfate, Dissolved	mg/L	74	8.4	Yes

TABLE 1 (cont'd)
Clinton Landfill No. 3
Apparent Exceedances for 1st Quarter 2014

Well	Parameter	Units	Initial Result	Interwell AGQS/MAPC	Resample?*
LOWER RADNOR TILL SAND WELLS					
G01M#	Nitrate-N, Dissolved	mg/L	14	0.14	Yes
G01M#	Solids - total dissolved solids (TDS)	mg/L	880	870	Yes
G01M#	Sulfate, Dissolved	mg/L	170	65	No
G05M#	Nitrate-N, Dissolved	mg/L	0.99	0.14	No
G08M#	Nitrate-N, Dissolved	mg/L	9.7	0.14	No
G16M	Boron, Dissolved	ug/L	630	622	Yes
G16M	Nitrate-N, Dissolved	mg/L	26	0.14	No
G20M	Lead, Dissolved	ug/L	3.4	1	Yes
G20M	Specific Conductance, Field Measured	umhos/cm	1510	1457	No
G24M	Nitrate-N, Dissolved	mg/L	12	0.14	No
G31M	Nitrate-N, Dissolved	mg/L	20	0.14	Yes
G39M	Nitrate-N, Dissolved	mg/L	4.5	0.14	No
G40M	Nitrate-N, Dissolved	mg/L	6.5	0.14	No
G47M	Boron, Dissolved	ug/L	700	622	No
G47M	Magnesium, Dissolved	mg/L	83	82.2	No
G47M	Nitrate-N, Dissolved	mg/L	3.1	0.14	No
G48M	Nitrate-N, Dissolved	mg/L	7	0.14	No
G49M	Magnesium, Dissolved	mg/L	87	82.2	No
G49M	Nitrate-N, Dissolved	mg/L	1.9	0.14	No
G49M	Sulfate, Dissolved	mg/L	360	65	No
G58M	Nitrate-N, Dissolved	mg/L	2.4	0.14	Yes
G58M	Sulfate, Dissolved	mg/L	120	65	Yes
R17M	Chromium, Dissolved	ug/L	7.1	4.6	Yes
R17M	Nitrate-N, Dissolved	mg/L	22	0.14	Yes
R17M	Solids - total dissolved solids (TDS)	mg/L	960	870	Yes
ORGANIC SOILS WELLS					
G01D#	Nitrate-N, Dissolved	mg/L	14	1.5	Yes
G02D#	Nitrate-N, Dissolved	mg/L	21	1.5	No
G03D#	Nitrate-N, Dissolved	mg/L	5.6	1.5	Yes
G06D#	Nitrate-N, Dissolved	mg/L	4.2	1.5	Yes
G08D#	Nitrate-N, Dissolved	mg/L	12	1.5	Yes
G09D	Sulfate, Dissolved	mg/L	150	76	No
G16D	Nitrate-N, Dissolved	mg/L	9.7	1.5	Yes
G31D	Nitrate-N, Dissolved	mg/L	5.7	1.5	No
G39D	Nitrate-N, Dissolved	mg/L	5.9	1.5	Yes
G48D	Nitrate-N, Dissolved	mg/L	7	1.5	No

TABLE 1 (cont'd)
Clinton Landfill No. 3
Apparent Exceedances for 3rd Quarter 2013

Well	Parameter	Units	Initial Result	Interwell AGQS/MAPC	Resample?*
G48D	Sulfate, Dissolved	mg/L	110	76	Yes
G49D	Nitrate-N, Dissolved	mg/L	2.2	1.5	Yes
G58D	Nitrate-N, Dissolved	mg/L	5.6	1.5	No
R17D	Magnesium, Dissolved	mg/L	75	72.1	Yes
R17D	Nitrate-N, Dissolved	mg/L	40	1.5	No

Notes:
1. #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. * No = CLI has previously confirmed an apparent exceedance for this parameter in accordance with 35 IAC 811.319(a)(4)(B), and current results are consistent with or declining from the previously confirmed concentration. Therefore, CLI does not intend to conduct additional confirmation sampling.
6. * Yes = CLI will follow the confirmation procedures of 35 IAC 811.319(a)(4)(B) to confirm the apparent exceedance.

s:\projects\91-118 cli\documents\gw docs\2014\cli3\2014_1q_cli3_confirmation.docx