



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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BRUCE RAUNER, GOVERNOR

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March 17, 2015

Ron Welk
Vice President of Development and Operations
Clinton Landfill, Inc.
4700 North Sterling Drive
Peoria, Illinois 61615-3647

Re: LPC#0390055036—DeWitt County
Clinton/Clinton Landfill #3
Compliance File

Dear Mr. Welk:

On February 24, 2015 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.

While no violations were noted at the time of this inspection, excessive litter was noted along the northern and eastern edges of the landfill. It must be collected by the end of the operating day.

For your information, a copy of the inspection report is enclosed. Please contact Dustin Burger at (217) 278-5800 if you have any questions regarding this inspection.

Sincerely,

John P. Richardson b/ds

John P. Richardson, Acting 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: 02/24/2015 Time: From 10:50A To 11:45A Previous Inspection Date: 12/29/2014
 Inspector(s): Dustin Burger Weather: Mostly clear, 20s. 6" snow, strong SW winds
 No. of Photos Taken: # 11 Samples Taken: Yes # No
 Interviewed: Dave Byrant, 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 51 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	<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"/>

10.	21(o)	CONDUCT A SANITARY LANDFILL OPERATION WHICH RESULTS IN ANY OF THE FOLLOWING CONDITIONS:	
	(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)	CAUSE OR ALLOW A LATERAL EXPANSION OF A MUNICIPAL SOLID WASTE LANDFILL (MSWLF) UNIT WITHOUT A PERMIT MODIFICATION	<input type="checkbox"/>
12.	21.6(b)	ACCEPTANCE OF LIQUID USED OIL FOR FINAL DISPOSAL (EFFECTIVE JULY 1, 1996)	<input type="checkbox"/>
13.	22.01	FAILURE TO SUBMIT ANNUAL NONHAZARDOUS SPECIAL WASTE	<input type="checkbox"/>
14.	22.17	LANDFILL POST-CLOSURE CARE	
	(a)	Failure to Monitor Gas, Water, Settling	<input type="checkbox"/>
	(b)	Failure to Take Remedial Action	<input type="checkbox"/>
15.	22.22(c)	ACCEPTANCE OF LANDSCAPE WASTE FOR FINAL DISPOSAL	<input type="checkbox"/>
16.	22.23(f)(2)	CAUSE OR ALLOW THE DISPOSAL OF ANY LEAD-ACID BATTERY	<input type="checkbox"/>
17.	22.28(b)	ACCEPTANCE OF WHITE GOODS FOR FINAL DISPOSAL	<input type="checkbox"/>
18.	55(b)(1)	ACCEPTANCE OF ANY USED OR WASTE TIRE FOR FINAL DISPOSAL (UNLESS LANDFILL MEETS EXEMPTION OF 55(b)(1))	<input type="checkbox"/>
19.	56.1(a)	CAUSE OR ALLOW THE DISPOSAL OF ANY POTENTIALLY INFECTIOUS MEDICAL WASTE	<input type="checkbox"/>
SOLID WASTE SITE OPERATOR CERTIFICATION LAW REQUIREMENTS			
20.	225 ILCS 230/1004	CAUSING OF ALLOWING OPERATION OF A LANDFILL WITHOUT PROPER COMPETENCY CERTIFICATE	<input type="checkbox"/>
35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G			
PRIOR CONDUCT CERTIFICATION REQUIREMENTS			
21.	745.181	CHIEF OPERATOR REQUIREMENTS	<input type="checkbox"/>
22.	745.201	PRIOR CONDUCT CERTIFICATION PROHIBITIONS	<input type="checkbox"/>
SPECIAL WASTE HAULING REQUIREMENTS			
23.	809.301	REQUIREMENTS FOR DELIVERY OF SPECIAL WASTE TO HAULERS	<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"/>
NEW SOLID WASTE LANDFILL REQUIREMENTS			
	PART 811 SUBPART	GENERAL STANDARDS FOR ALL LANDFILLS	
26.	811.103	SURFACE WATER DRAINAGE	
	(a)	Runoff from Disturbed Areas	<input type="checkbox"/>
	(b)	Diversion of Runoff from Undisturbed Areas	<input type="checkbox"/>
27.	811.104	SURVEY CONTROL	
	(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	COMPACTION	<input type="checkbox"/>
29.	811.106	DAILY COVER	
	(a)	Six Inches Soil	<input type="checkbox"/>
	(b)	Alternative Daily Cover	<input type="checkbox"/>
30.	811.107	OPERATING STANDARDS	
	(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	SALVAGING	
	(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	BOUNDARY CONTROL	
	(a)	Access Restricted	<input type="checkbox"/>
	(b)	Proper Sign Posted	<input type="checkbox"/>

33.	811.110	CLOSURE AND WRITTEN CLOSURE PLAN	
	(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	POST-CLOSURE MAINTENANCE	
	(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	RECORDKEEPING REQUIREMENTS FOR MSWLF UNITS	
	(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"/>
	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)	<input type="checkbox"/>
37.	811.309	LEACHATE TREATMENT AND DISPOSAL SYSTEM	
	(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	LANDFILL GAS MONITORING (FOR SITES ACCEPTING PUTRESCIBLE WASTE)	
	(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	LANDFILL GAS MANAGEMENT SYSTEM (FOR CHEMICAL AND PUTRESCIBLE LANDFILLS)	
	(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	LANDFILL GAS PROCESS AND DISPOSAL SYSTEM	
	(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	INTERMEDIATE COVER	
	(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	FINAL COVER SYSTEM (DOES NOT APPLY TO PART 814 SITES THAT HAVE CLOSED, COVERED AND VEGETATED PRIOR TO SEPTEMBER 18, 1990)	
	(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	PLUGGING AND SEALING OF DRILL HOLES	<input type="checkbox"/>
44.	811.321	WASTE PLACEMENT	
	(a)	Phasing of Operations	<input type="checkbox"/>
	(b)	Initial Waste Placement	<input type="checkbox"/>
45.	811.322	FINAL SLOPE AND STABILIZATION	
	(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	LOAD CHECKING PROGRAM	
	(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"/>
	PART 811 SUBPART D	MANAGEMENT OF SPECIAL WASTES AT LANDFILLS	
47.	811.402	NOTICE TO GENERATORS AND TRANSPORTERS	<input type="checkbox"/>
48.	811.403	SPECIAL WASTE MANIFESTS REQUIREMENTS	<input type="checkbox"/>
49.	811.404	IDENTIFICATION RECORD	
	(a)	Special Waste Profile Identification Sheet	<input type="checkbox"/>
	(b)	Special Waste Recertification	<input type="checkbox"/>
50.	811.405	RECORDKEEPING REQUIREMENTS	<input type="checkbox"/>
51.	811.406	PROCEDURES FOR EXCLUDING REGULATED HAZARDOUS WASTES	<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

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: February 24, 2015

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
February 24, 2015 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 February 24, 2015. 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. Nine (9) photos were taken of Unit #3. The weather was mostly clear with temperatures in the low 20s. There were approximately 4-6 inches of snow on the ground, and strong winds from the south were blowing at 20-25 mph. The previous day also had strong winds, but from predominately from the west.

Site Inspection

When I arrived at the landfill I checked in at the landfill office and met Dave Bryant, the manager of the landfill. We first drove to the scalehouse to look through paperwork. While at the scalehouse, I checked the facility's inspection logs, special waste logs, and asbestos logs. No new special wastes had been accepted since my last inspection, so I did not check any waste profile documents during this visit.

Special wastes accepted included:

- Fermentation broth from Solazyme Manufacturing
- Water from an MGP site in LaSalle
- Paint sludges from Mitsubishi in Normal
- Water jet sludges from Paul's Welding in Villa Grove
- Liquefaction sludge from ADM in Decatur

Asbestos wastes were received from schools in Clinton, Mahomet, Macon, and the University of Illinois.

While at the scalehouse, a load of coal ash was on the scale. Bill, the scalehouse operator, was busy conducting field tests on the ash. Dave explained that Clinton Landfill has decided to use the Chemical Waste Unit (CWU) to dispose of coal combustion ash to separate the waste from the regular trash in the municipal cell. The facility was being extra cautious with the ash, which contains large amounts of lime.

There was concern that the heat generated when ash gets wet could cause too much heat and potentially start an underground fire. Any wastes disposed of in the CWU must be field tested for pH, ignitability, and the paint filter test.

After checking paperwork we first drove to the Chemical Waste Unit (CWU). The east half of the CWU was receiving coal ash waste. Part of the plastic used to keep stormwater from entering the leachate collection system had been pulled back and the ash was being dumped at the edge and pushed out onto the floor of the cell. Two piles of soil to be used for daily cover were staged at the area (photo 3), and drivers were instructed to dump between them so the waste could be pushed out into the cell. When waste is first placed into a cell, the initial lift of ten feet of waste is used to protect the liner from the movement of heavy equipment.

While we were at the CWU, the driver we had seen at the scalehouse dumped one load of ash between the two piles of soil.

Leachate from the CWU is stored in a double walled tank below the concrete pad located on the west side of the cell. Leachate is pumped from a sump into pipes running along the sidewall liner and into the storage tank. Any spills from the out-loading of leachate drains back into the tank.

From the CWU, we then drove to the active area, where I took one photo. Several trucks were lined up to dump. The area was busy, with several trucks actively dumping while I watched. The areas around the active area were well covered. The strong south wind was blowing considerable amounts of litter to the mobile fences erected around the active area. No banned waste, such as tires, landscape waste, or electronics were found.

Two new leachate recirculation wells had been built in the northwest portion of the landfill. The wells do not use the horizontal piping method of recirculating leachate, which tends to be prone to damage as the waste mass settles. Instead, the injection point is a simple well with a cone of gravel to drain leachate back into the waste mass. A Supplemental Permit designated Log. No. 2015-064 with construction details was received by the Agency February 9, 2015, but an operating permit is not yet granted.

The small gas flare servicing Unit 3 was operating normally. The facility plans to construct piping to connect Unit #3 with the gas system and gas-to-energy plant located northwest of Unit #2. A main gas header has been installed and permitted to collect the gas from Unit #3. The gas plant was currently not operating. During my previous inspection, Kyle Martin said a new company had purchased the plant, and had removed the gas engines. The older engines were being replaced by two newer engines, with the possibility of expanding with additional engines in the future. Bryant said the new engines were now installed, and they were expected to be back in service as early as the afternoon of the inspection. The two flares near the plant were being used to control gas in the meantime.

The new cell designated both 5B and 3C had been completed. The new cell is east of the current 5A, and includes a finger extending north to complete the last portion of Section 3. The HDPE liner, leachate collection system, and drainage layer had been installed, but thus far no waste had been placed in the cell as the operational permit has not been granted.

We then drove to the liquid waste solidification area located on top of Cell 1C (photo 5). 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 to control air pollution when it is burned. When the lime contacts water, the dissolution reaction is very exothermic and generates heat. On cold days steam can be seen rising from the tank. No wastes were being solidified at the time of the inspection.

We then drove the perimeter of the landfill. Strong winds had blown large amounts of litter onto the northern litter nets that surround the north sedimentation basin (photo 6). The nets are suspended on telephone poles and are approximately 30 feet high. They were installed primarily to keep litter out of the pond. Picking up litter on the ground is relatively easy, but fishing litter out of water is much harder and potentially dangerous to employees.

When we drove to the east side of the landfill, I saw large amounts of litter in the trees that line the edge of the landfill (photo 7). The landfill rents a man-lift for employees to use to retrieve litter from the trees (photo 8). Several dozen bags of litter were observed on the east side. The bags contained litter that had been collected (photo 9).

Both the Environmental Protection Act and facility's permit require that all litter be collected at the end of the operating day. There is circumstantial evidence that the litter on the east side was present from the previous day since the winds were from the south during my visit, but were from the west the previous day. Legally, however, it would be difficult to prove that a gust from the west on the day of the inspection did not cause the litter on the east side.

This was the first time I had seen excessive litter at this landfill in the many years I have inspected the site. Two days of strong winds were the main issue. Clinton Landfill does not have a condition in its permit or local siting agreement to close down when certain wind speeds are exceeded. Ideally, the manager would like to work in the new cell, which is below grade and sheltered from strong winds.

Currently, the landfill hires extra temporary help to manually pick up the material. Bryant said he has two full-time employees and two temporary helpers from a temp agency working on the litter issue. Bryant added that when it is both cold and windy as it has been this February, the workers need frequent breaks to warm up.

Permitting

The facility is operating under permit 2005-070-LF, which expires on February 15, 2017. The permit renewal was granted in Modification 29 on July 7, 2012. The permit includes a 157.451 acre waste disposal area with a gross airspace of 32,014,225 cubic yards. At current waste disposal rates, the space is estimated to last 45 years.

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

During its life, the CWU has received 27,661 tons of MGP source material. Of that amount, 19,137 tons were from one site in Mattoon. In addition to the MGP waste, 2,264 tons of salt waste and 125 tons of ash were disposed in the unit through 2014.

In addition to the exclusion of MGP source material from the CWU, Modification 47 also revokes the Agency's permission to accept PCB contaminated materials that exceed the 50 parts per million limit in the Toxic Substance Control Act (TSCA). The landfill has never accepted TSCA regulated materials, since it needed approval by USEPA to receive the material. The Federal permit was never issued.

Modification 51 of the Permit was issued on February 27, 2015. This modification approved use of auto shredder fluff used as alternate daily cover.

The cost estimate for closure of the current landfill's 32.8 acres of municipal solid waste disposal and 6.14 acres comprising the CWU is \$10,742,793. This value includes \$4,762,084 for premature closure, and \$5,980,709 for post-closure care. The landfill currently has \$10,932,021 in posted financial assurance. This amount will be increased when the new cell begins operating.

Record Review

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

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

The landfill disposes of leachate in one of three ways. First, the liquids can be recirculated. Unit #3 just installed its first recirculation wells, but is waiting for a permit to operate them. 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. An accompanying graph provided by the landfill shows the amounts of leachate generated and how it was handled.

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: February 24, 2015
TIME: 10:50-11:45 A.M.
DIRECTION: South
PHOTO by: Dustin Burger
PHOTO FILE NAME:
0390055036~02242015-001.jpg
COMMENTS: Chemical Waste Unit



DATE: February 24, 2015
TIME: 10:50-11:45 A.M.
DIRECTION: South
PHOTO by: Dustin Burger
PHOTO FILE NAME:
0390055036~02242015-002.jpg
COMMENTS: duplicate photo





Illinois Environmental Protection Agency
Bureau of Land

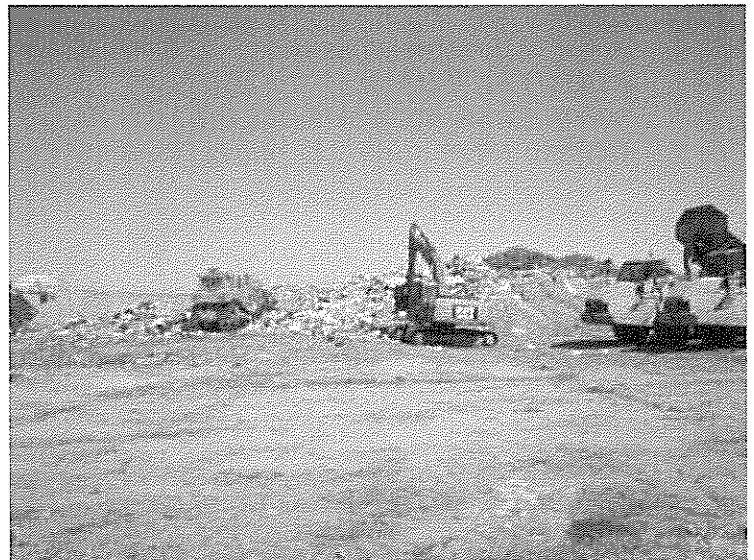
DIGITAL PHOTOGRAPHS

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

DATE: February 24, 2015
TIME: 10:50-11:45 A.M.
DIRECTION: South
PHOTO by: Dustin Burger
PHOTO FILE NAME:
0390055036~02242015-003.jpg
COMMENTS: CWU Cover soil
stockpiled



DATE: February 24, 2015
TIME: 10:50-11:45 A.M.
DIRECTION: East
PHOTO by: Dustin Burger
PHOTO FILE NAME:
0390055036~02242015-004.jpg
COMMENTS: active area





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DIGITAL PHOTOGRAPHS

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

DATE: February 24, 2015
TIME: 10:50-11:45 A.M.
DIRECTION: South
PHOTO by: Dustin Burger
PHOTO FILE NAME:
0390055036~02242015-007.jpg
COMMENTS: east side of landfill



DATE: February 24, 2015
TIME: 10:50-11:45 A.M.
DIRECTION: East
PHOTO by: Dustin Burger
PHOTO FILE NAME:
0390055036~02242015-008.jpg
COMMENTS: man lift for picking litter
from trees





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DIGITAL PHOTOGRAPHS

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

DATE: February 24, 2015
TIME: 10:50-11:45 A.M.
DIRECTION: East
PHOTO by: Dustin Burger
PHOTO FILE NAME:
0390055036~02242015-005.jpg
COMMENTS: solidification unit



DATE: February 24, 2015
TIME: 10:50-11:45 A.M.
DIRECTION: Northeast
PHOTO by: Dustin Burger
PHOTO FILE NAME:
0390055036~02242015-006.jpg
COMMENTS: north litter fences





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DIGITAL PHOTOGRAPHS

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

DATE: February 24, 2015
TIME: 10:50-11:45 A.M.
DIRECTION: South
PHOTO by: Dustin Burger
PHOTO FILE NAME:
0390055036~02242015-009.jpg
COMMENTS: bags of litter from
picking up litter from east side of
landfill





© 2015 Google

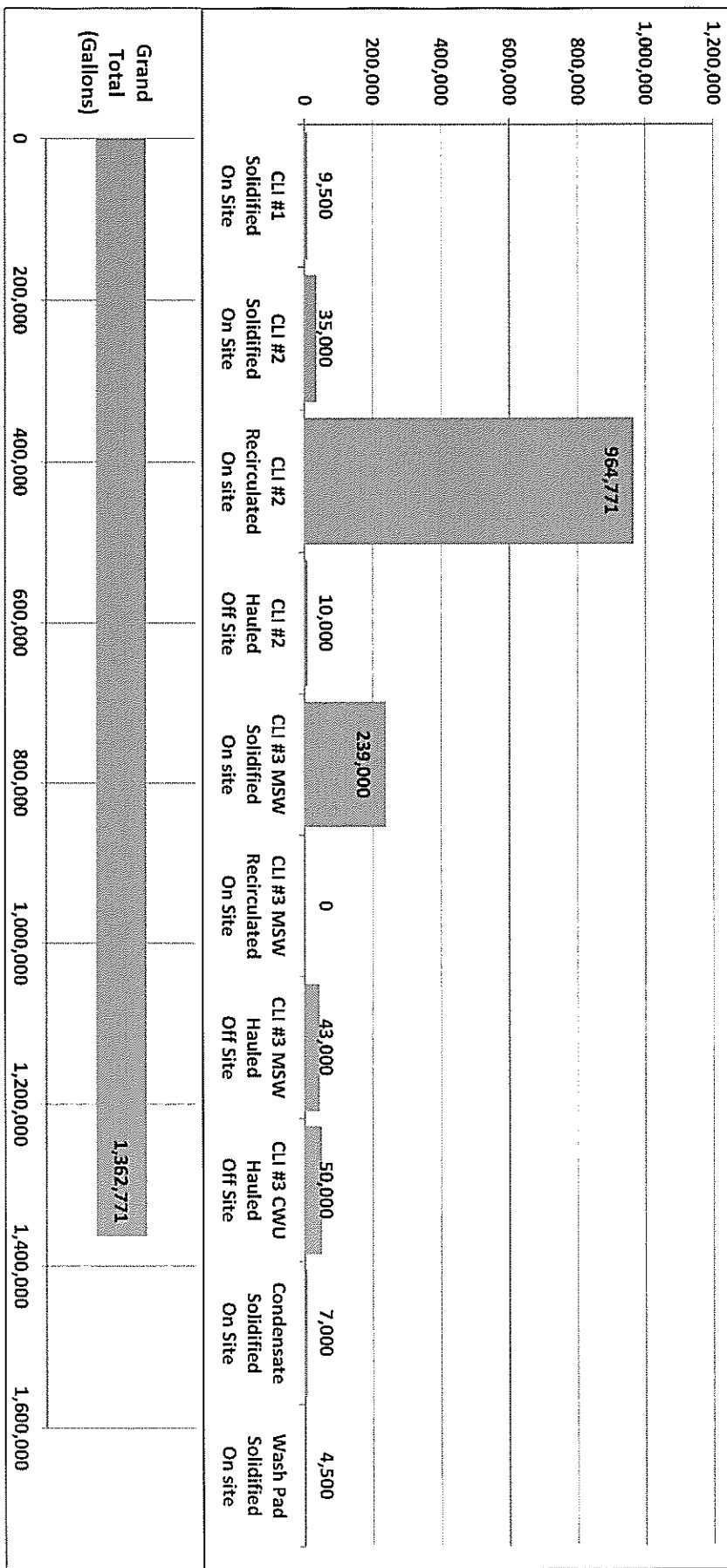
© 2010 Google

Imagery Date: 4/10/2012

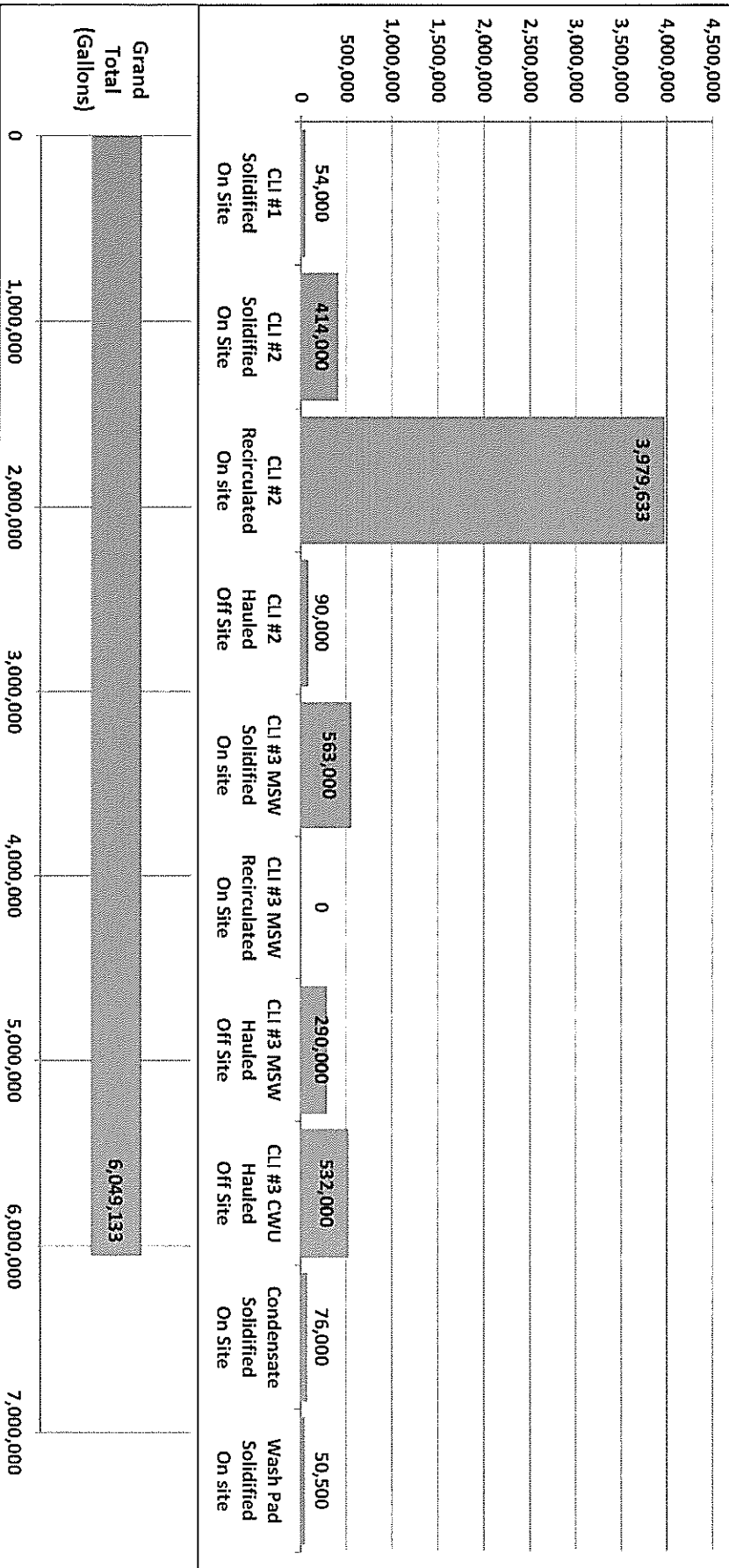
40°06'50.40" N 88°57'04.30" W elev 723 ft

Eye alt 7898 ft

Clinton Landfill, Inc. Leachate Management Summary Annual 2015 (Gallons)



Clinton Landfill, Inc. Leachate Management Summary Annual 2014 (Gallons)



Waste Disposed at CWU
2011-2014

Account	Last Load	Generator	Waste	Landfill	Tons	Drums
66-6	9/20/2011	ComEd Dixon	MGP Source Material	CWU	109.80	
66-2	10/28/2011	Ameren Quincy	MGP Source Material	CWU	2,041.82	
66-3	12/14/2011	Ameren Mattoon	MGP Source Material	CWU	19,137.89	
66-8	12/22/2011	Ameren Clinton	MGP Source Material	CWU	2,295.95	
66-7	12/22/2011	Ameren Clinton	Demo Debris Source Material	CWU	92.60	
66-10	12/22/2011	DTE Stoneman	Fly Ash and Bottom Ash	CWU	125.72	
66-9	12/30/2011	ComEd Lockport	MGP Source Material	CWU	680.21	
			2011 Total		24,483.99	
66-9	8/20/2012	ComEd Lockport	MGP Source Material	CWU	1,935.07	
			2012 Total		1,935.07	
66-15	2/5/2013	Air Liquide Pevely	Drum Sludge w/ Free Liquid	CWU		2
66-14	2/5/2013	Air Liquide Pevely	Cooling Tower Water	CWU		1
66-13	2/5/2013	Air Liquide Pevely	Scale From Pipe	CWU		1
66-16	6/24/2013	ComEd DuQuoin	MGP Source Material	CWU	1,428.88	
66-12	9/19/2013	ComEd Rockford	MGP Source Material	CWU	1,723.88	
66-17	10/14/2013	Ameren East St. Louis	MGP Source Material	CWU	313.50	
08-41781	Ongoing	3M Company	HFE Salt Waste	CWU	245.46	
			2013 Total		3,711.72	4
08-41781	Ongoing	3M Company	HFE Salt Waste	CWU	2,019.16	
			2014 Total		2,019.16	
			Grand Total		32,149.94	4

