

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: 08/24/2016 Time: From 10:00A To 10:20A Previous Inspection Date: 08/17/2016
 Inspector(s): Dustin Burger Weather: Mostly clear, dry, 80s
 No. of Photos Taken: # 0 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 61 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 checked="" type="checkbox"/> |
| 2. | 9(c) | CAUSE OR ALLOW OPEN BURNING | <input checked="" 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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| 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 checked="" 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"/> |

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| 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 checked="" 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"/> |

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| 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"/> |

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| 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 | |
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| 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
August 24, 2016 Inspection
Inspector: Dustin Burger
GIS Information from BOL Inventory: N40.11507 W-88.9589

Narrative Inspection Report

I conducted a complaint inspection at the above referenced facility on August 24, 2016. 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. No photos were taken. The weather was mostly sunny and dry, with temperatures in the 80s.

Site Inspection

Champaign FOS received a complaint on August 23, 2016 regarding a fire that occurred at the landfill on August 22, 2016. The fire was observed coming from the area around the landfill's waste solidification unit at the top of Unit 3, and was said to have sent smoke eastward onto Illinois Route 51.

I investigated the complaint the next day, August 24, 2016 at 10:00 A.M. When I arrived at the landfill I checked in at the landfill office. Mr. Bryant escorted me during our inspection.

Mr. Bryant explained that the waste that being solidified in the solidification unit had caught on fire during the morning on August 22, 2016. He said the fire occurred right next to the south solidification tank in a small pile of waste. He said the fire burned for approximately ten minutes, and was extinguished by the facility's water truck.

From the waste acceptance log, it appears as if waste involved was from a seal ring lapping process at Caterpillar's Mapleton facility. The waste profile for the waste indicates it is 60% petroleum distillates and aluminum oxide, 30% iron and other trace metals, and 10% water. The waste does not pass the paint filter test, which means it is regulated as a liquid waste. The material has a flash point of greater than 200 degrees Fahrenheit, which means the waste is not regulated as an ignitable waste. The profile also notes that the material can generate hydrogen gas, which can build up in a closed container.

In speaking with Caterpillar, I learned the waste is generated from the making of gaskets for heavy machinery. It is mixture of metal filings, a light lubricating oil, and 10% water. The waste profile notes the waste can give off hydrogen gas which can build up in closed containers. I asked CAT representatives what kind of reaction is involved to give off hydrogen. The answer I got is that it was a catalytic reaction, but it was not otherwise specific. The instructions on the waste profile indicate to not let the waste sit in an enclosed container. The hydrogen evolution is slow, but could build up over time in a closed container and cause a fire.

Wastes are bench tested for compatibility before solidification according to Section III.11 of the facility permit. The bench test is designed to determine if there are any adverse reactions when the waste is solidified with bottom ash.

Next comes into question of whether this material would be considered a hazardous waste. Since it is a liquid, the RCRA method of determining whether is waste is hazardous is whether the material has a flash point of <140 degrees F. The flash point was >200 degrees, it is therefore not ignitable by definition.

I spoke with Ted Dragovich regarding whether something that spontaneously combusts is considered an ignitable or reactive waste. He sent me the following information:

The test method for spontaneous combustion is described at: <https://www.epa.gov/hw-sw846/sw-846-test-method-1050-test-methods-determine-substances-likely-spontaneously-combust>

USEPA states, “To clarify, the test results of this method cannot be used to directly classify a waste as a D001 hazardous waste, nor can the results be used by themselves to definitively classify a waste as non-hazardous. No specific test for ignitable solids is required by the RCRA regulations, and only a waste meeting the regulatory definition at 40 CFR 261.21(a)(2) is an ignitable hazardous waste because it is an ignitable solid.”

Note that the above quote speaks to ignitable solids, while the CAT waste is classified as a liquid since it does not pass the paint filter test. It would seem the same standard would apply regarding spontaneous combustion. The summary of the issue is that items is that materials that spontaneously combust are not necessarily RCRA hazardous unless they fall into the specific regulatory definition.

In this case, the specific cause of the fire is a mystery.

This is the second fire involving special wastes at Clinton Landfill since June 18, 2016. While the landfill cannot necessarily stop all fires from hot loads that might have hidden smoldering wastes from a burn barrel, the facility can institute procedures to eliminate fires from wastes that are known to spontaneously combust like the spent filter clay on June 18, and the Caterpillar waste on August 22, 2016. The landfill has a duty to prevent open burning of wastes in the Act and the Regulations.

Summary of Apparent Violations

1. Pursuant to Section 9(a) of the Act, no person shall cause or threaten or allow the discharge or emission of any contaminant into the environment in any State so as to cause or tend to cause air pollution in Illinois, either alone or in combination with contaminants from other sources, or so as to violate regulations or standards adopted by the Board under this Act.

A violation of Section 9(a) of the [Illinois] Environmental Protection Act (415 ILCS 5/9(a)) is alleged for the following reason: **Clinton Landfill has caused or allowed the burning of industrial wastes which causes or tends to cause air pollution in Illinois.**

2. Pursuant to Section 9(c) of the Act, in relevant part, no person shall cause or allow the open burning of refuse, conduct any salvage operation by open burning, or cause or allow the burning of any refuse in any chamber not specifically designed for the purpose and approved by the Agency pursuant to regulations adopted by the Board under this Act.

A violation of Section 9(c) of the [Illinois] Environmental Protection Act (415 ILCS 5/9(c)) is alleged for the following reason: **Clinton Landfill has caused or allowed the open burning of industrial waste.**

3. Pursuant to Section 21(o)(4) of the Act, no person shall conduct a sanitary landfill operation which is required to have a permit under subsection (d) of this Section, in a manner which results in open burning of refuse in violation of Section 9 of this Act.

A violation of Section 21(o)(4) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(o)(4)) is alleged for the following reason: **Clinton Landfill has conducted a sanitary landfill operation which resulted in the open burning of refuse.**

4. Pursuant to 35 Ill. Adm. Code 811.107(f), open burning is prohibited except in accordance with 35 Ill. Adm. Code 200 through 245.

A violation of 35 Ill. Adm. Code 811.107(f) is alleged for the following reason: **Clinton Landfill has conducted a sanitary landfill operation which resulted in the open burning of refuse.**