US EPA ARCHIVE DOCUMENT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

LR-8J

0 6 JAN 2009

Ron Welk, General Manager
Clinton Landfill Inc.
Post Office Box 9071
Peoria, Illinois 61612-9071

Dear Mr. Welk:

In response to discussions between you and my staff over the last month regarding your application to dispose of PCBs at the Clinton Landfill #3, Clinton, Illinois, we have put together a synopsis of unresolved issues. They are intended to supplement the Preliminary Notice of Deficiencies we issued on August 21, 2008.

The issues in our original notice to you regarding how groundwater modeling was used in the application remain. In addition, please note that stabilization of PCB waste on site for landfilling purposes, as you requested, is being considered. Included below are items that need to be addressed.

1. Groundwater Impact Assessment Report: We are concerned that the groundwater impact assessment report and the tables summarizing your data may be ignored. We request you prepare a summary of the report, suitable for general use, to add to the document you sent us. As discussed with my staff, please include contoured chemical concentrations plotted onto geological cross sections to show flow through the soil profile and indicate how the Mahomet Aquifer is being protected.

2. Methane Recovery in adjacent cells: We find that the TSCA application did not provide sufficient information to assure EPA that the proposed PCB cell, or monitoring of it, would not be affected by the RCRA Subtitle D cell. Please provide additional information to address this matter, including information on fire control and the monitoring and control of landfill gas.

3. Groundwater controls: There are minor amounts of groundwater present within the local clay pan. Please use the Groundwater Impact Assessment to explain the significance of potential pathways to Salt Creek or to the Mahomet Aquifer.

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4. Site properties: Identify and explain the importance of any designated, published or otherwise unusual natural features known to make the location of the proposed cell favorable or not favorable for landfilling?

5. Site materials: The soil making up the recompacted clay liners does not meet TSCA requirements for liquid limit and plasticity. While there are many protective measures built into the landfill that contribute to design safety, such as membrane liners, underdrains and composite liners, the clay liners are still important. Please submit evidence to show, given soil moisture and plastic clays at depth, how the recompacted clay liners would not necessarily be subject to desiccation cracking and might perform as well as if it were built of material that meets TSCA requirements.

6. Geotechnical stability models: We are concerned that the landfill sub-base geotechnical slope stability model may not have enough resolution. It appears the slope stability models did not adequately include either the Berry Clay outside the cell or the bentonite liner inside the cell. Please explain how they would affect the output of the model or how their presence was otherwise factored into the overall assessment.

7. Disposal of leachate: A disposal plan for the TSCA cell's leachate is required.

8. Waste acceptance criteria: The waste acceptance and analysis plan must include not only testing for chemical waste incompatibility but potential problems that could develop in the TSCA cell due, for example, to recirculation of leachate and acceptance of gypsum drywall.

9. Railroad Waste Handling Facilities: Ensure that the new rail head is in compliance with all Department of Transportation and Department of Homeland Security and any other regulations.

10. Financial Assurance: Provide the proposed financial assurance mechanism.

11. PCB articles and article containers: Include how you proposed to accept and dispose of PCB articles and article containers.

12. Leak Detector: What measures have been taken to block infiltration of water into the leak detector?

13. ID numbers: As described in 40 CFR 761.205, please notify United States Environmental Protection Agency, Washington D.C. Office of Solid Waste of your application to dispose of PCBs.

14. Cleanouts and Man ways: Show proposed cleanouts and man ways and how they will provide sufficient access and resist crushing, kinking, consolidation related down-drag or anything else that might limit leachate removal and leak detector operations.

If you have any questions, please feel free to contact me or Steve Johnson, of my staff, at 312-886-1330.

Sincerely,

Willie H. Harris

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division