

US EPA ARCHIVE DOCUMENT



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

AUG 21 2008

REPLY TO THE ATTENTION OF:

LC-8J

Mr. Ron Welk
General Manager
Clinton Landfill Inc.
P.O. Box 9071
Peoria, Illinois 61612-9071

Re: Preliminary Notice of Deficiency
TSCA Application for a Chemical Waste Unit at the Clinton Landfill No. 3

Dear Mr. Welk:

Thank you for sending us an excerpt of your application to modify a solid waste landfill disposal approval issued by the State of Illinois. The groundwater impact assessment prepared for Clinton Landfill No. 3, dated February 1, 2008, and submitted to us on March 26, 2008, and the assessments in the October 2007 Toxic Substances Control Act (TSCA) application are still in review. Meanwhile, I feel it is imperative to raise some issues with information we have reviewed at this time.

The scope of subsurface investigations included in the TSCA application and the groundwater impact assessment is limited. We request an investigation with a broader scope but including specific targets. The investigations and modeling must specifically focus on the Mahomet Aquifer and nearby municipal water well fields and explain the impact of the entire landfill on them in ways that the public can understand. Review of existing conditions and development of hydrogeological forecasts over the entire Clinton Water Resource Protection Zone or within a 10-15 mile radius of the landfill will help increase the level of effectiveness of the investigations and address our issues. For example, there is an 11-well drinking-water supply field described by the Illinois State Water Survey for the City of Clinton approximately 8,600 to 10,500 feet north and northwest of the landfill and a 12-well field for Weldon Springs located 3,900 to 6,700 feet east northeast of the landfill. They may be outside of the minimum area of influence under requirements for municipal solid waste landfills but they are still within the area of concern for many users of that water. The potential impacts of the entire landfill on those well-fields should be evaluated and clarified.

We are pleased to see the detailed geochemical groundwater models you provided, but the new material focuses on impacts to a thin sand body about 20 feet below the waste. That sand body is related to surface water issues and is far from the aquifer of concern. Although the numerical modeling for the Mahomet Aquifer included in your original application suggests protectiveness, the model needs more work to be used effectively. For example, the basis for the

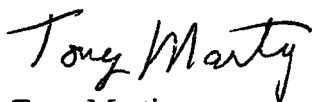
selection of various particular numbers and assumptions used in the model is very abstract and quite involved. Since the modeling is of critical importance and will likely need to be explained to many people, the modeling should be supplemented by information using language that can be easily understood by the public.

There may well be other issues and comments as we complete our review so I reserve final judgment on the completeness and adequacy of the application until the appropriate time.

Information addressing the issues raised in this letter should be submitted to Steve Johnson, of my staff, at the above address, as a supplement to the TSCA application, within 30 days of the receipt of this letter.

If you have any questions on any of the issues raised in this letter, please contact Mr. Johnson at (312) 886-1330.

Sincerely,

A handwritten signature in cursive script that reads "Tony Martig".

Tony Martig
Chief
Toxics Section
Chemicals Management Branch