

US EPA ARCHIVE DOCUMENT

Clinton Landfill PCB application Draft Cklist Dec. 09, smj					EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of June 2010 smj-USEPA										
Technical itemization of elements-completeness					required	present	not present	Reviewer	Adequate	EPA revision
A.	Geographic Information					x				
	1	Physical Geography				x				
a.		site location			x	x				
	1	quarter, section, township and range (7 1/2' USGS Quadrangle Map)			x	x				
	2	latitude and longitude				x				
	3	legal boundaries			x	x				
	4	local zoning status				x				
b.		site/owner/contractor information			x		x	needs name of owner, relationship with operator data		
	1	mailing address			x	x				
	2	owner's address and telephone number			x		x			
	3	operator's address and telephone number			x	x				
	4	contractor's address and telephone number			x	x				
c.		topography			x	x				
d.		soil			x	x				
	1	engineering classification			x	x				
	2	agricultural classification					x	not necessary		
e.		water				x				
	1	closest open water body			x	x		as designated by EPA		
	2	direction of surface runoff			x	x		see NPDES permit		
	3	groundwater recharge areas			x	x				
	4	depth to water table			x	x				
	5	100 year (and 500 year) floodplain elevation			x	x		500 yr flood projections not Req. or present		
f.		wells				x				
	1	closest drinking water wells			x	x		requested more information		
	2	closest well water drinking population			x	x		requested more information		
	3	injection/withdrawal wells				x				
g.		prevailing wind direction (wind rose)					x	Air monitoring work not present		
h.		local land use				x				
	1	present				x				
a)		industrial				x				
	1)	pipelines				x		County/state permit to excavate suffices		
	2)	pump stations				NA				
	3)	meter stations				NA				
b)		residential				x				
	1)	within 500'				x				
	2)	recreational				x				
c)		farms				x				
d)		highways				x				
	2	future					x	not required		
a)		industrial					x	LF setback zone does not restrict new industry		
b)		residential					x	exclusionary zone should apply to new construction		
c)		farm					x			

Clinton Landfill PCB application Draft Cklist Dec. 09, smj				EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of june 2010 smj-USEPA									
Technical itemization of elements-completeness				required	present	not present	Reviewer	Adequate	EPA revision
2 <i>Environmental Geography</i>					x				
a.	location within 100 year flood plain			x	x				
b.	endangered species			x	x		State declaration on musse	x	
1	breeding grounds					x	not noted		
2	habitat				x				
c.	sensitive areas					x	not noted, apparently none		
1	wetlands			x	x				
2	waterways			x	x				
3	fishing sites					x	none on site		
4	groundwater			x	x				
a)	sole source aquifers			x	x				
b)	major aquifers			x	x				
5	food and feed areas			x		x	Farming area near PCB site		
B.	Geologic Information								
1	<i>Regional and Site-Specific Geologic History</i>				x				
2	<i>Physiographic Province</i>				x				
3	<i>Regional and Site-Specific Stratigraphy</i>				x				
4	<i>Site Bedrock Lithology</i>								
a.	geologic names				x		Pennsylvanian	x	
b.	physical description				x			x	
c.	depth to top of bedrock				x				
d.	name and depth of next rock unit down						Pennsylvanian, No sinkhole	x	x
5	<i>Material Overlying Top of Rock at Site</i>								
a.	physical description			x	x				
(sand, gravel, glacial till, soil, etc.)				x					
b.	surface soils (engineering classification)			x	x				
c.	subsurface soils (engineering classification)			x	x				

Clinton Landfill PCB application Draft Cklist Dec. 09, smj				EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of June 2010 smj-USEPA									
Technical itemization of elements-completeness				required	present	not present	Reviewer	Adequate	EPA revision
C.	Site-specific Hydrogeologic Information								
	1	Water Table							
a.		current			x				
b.		historical high water table			x		limited to available site data		
c.		hydraulic connection to surface water				x	Can be inferred from data		
	2	Local Gradient			x				
	3	Nearest Groundwater Recharge Areas				x	Weldon Springs?		
	4	Nearest Aquifer(s)			x				
a.		name			x		L. Radnor, EPA says Mahc Controversy		
b.		depth to top of aquifer			x				
c.		depth to top of water			x				
d.		horizontal distance (if applicable)			x				
e.		characteristics				x	mahomet water supply not evaluated		
	1	thickness			x				
	2	gravel, sand, etc.			x				
	3	confined, unconfined				x	Descriptions exist but little is made of them		
	4	quality				x	mahomet water quality not evaluated		
	5	present and future usage (drinking water)				x	subject of initial notification		
	5	Nearest Aquitard			x		Many, multi-layering		
a.		name			x				
b.		elevation of top			x				
c.		elevation of base			x				
d.		characteristics			x				
	1	thickness			x				
	2	continuity			x	x	only brief comments about small sand zones		
	6	Permeability of Geologic Units							
a.		soil			x				
b.		soil/rock interface			x				
c.		rock				x	Is underlying rock coaly or a karstic water sink, source,		
	7	Groundwater							
a.		general flow patterns - Laplace flow net				x	GIA model, graphs poor	no	adequate
b.		piezometric surface			x			adequate	

Clinton Landfill PCB application Draft Cklist Dec. 09, smj				EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of June 2010 smj-USEPA									
Technical itemization of elements-completeness				required	present	not present	Reviewer	Adequate	EPA revision
D.	Site Chemistry								
	1	<i>PCB Mobilizing Solvents</i>							
a.		type			x	x	adjacent to municipal waste, tar/waste gas byprod.		
b.		distribution			x		not in TSCA cell, but overhead MSW possible		
	2	<i>Other Contaminants</i>			x		In MSW Cell		
a.		type			x		construction waste?		
b.		distribution			x		in MSW Cell		
E.	Site Risks								
	1	<i>PCB Mobility</i>			x				
a.		solvents				x	methane, leachate, fires, coal gasification waste		
b.		floods			x				
c.		landslides			x		questions regarding LF Stability models		
	2	<i>Environmental</i>			x				
a.		endangered species			x		"No risk" statement from State re: Mussel in Salt Ck.		
	1	breeding grounds			x		offsite, Salt Ck.		
	2	habitat			x		offsite, Salt Ck.		
b.		sensitive areas			x				
	1	wetlands				x	wedron springs, breakouts from Upper Radnor, seeps		
	2	waterways			x				
	3	fishing sites			x				
	4	groundwater			x				
a)		source aquifers			x				
b)		major aquifers			x				
	5	food and feed areas			x	x	farms nearby, what kind, impact?		

Clinton Landfill PCB application Draft Cklist Dec. 09, smj			EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of June 2010 smj-USEPA								
Technical itemization of elements-completeness			required	present	not present	Reviewer	Adequate	EPA revision
G.	Landfill Technical Requirements							
	1	General Site Plan		x				
a.		Landfill location		x				
	1	soil type		x				
	2	distance from water table		x				
	3	location relative to 100-year flood plain		x				
	4	distance from shorelands		x				
	5	distance from groundwater recharge areas			x	karst, lakes, none in immediate area		
	6	topography		x				
b.		Design features		x				
	1	liners		x				
a)		large-area clay pan			x	Exists but no effort to make claim		
	1)	thickness		x				
	2)	extent			x	Looked some of it up myself		
	3)	properties		x				
	4)	liner/leachate compatibility		x		Mfg's statements only, biocompatible?		
b)		in-place soil		x				
	1)	thickness		x				
	2)	properties		x				
	3)	liner/leachate compatibility						
c)		compacted soil liner		x				
	1)	thickness		x				
	2)	properties		x				
	3)	liner/leachate compatibility			x			
	4)	installation method		x				
d)		synthetic membrane liner(s)		x				
	1)	thickness		x				
	(a)	membrane		x				
	(b)	soil underlining and soil cover		x				
	2)	integrity document		x		no plan to minimize risks	no	
	(a)	liner/leachate compatibility		x		articles, mfg. data only	no	needs bio work
	i)	HDPE liner mfg. data		x		HDPE generally	yes	suggest more
	ii)	published reference articles		x			no	HDPE State of Art?
	iii)	physical chem. Concerns		x		EPA Ad Hoc opinion OK?		?
		Oxidation minimization			x	keep water on plastic?		?
	iv)	biochem concerns			x	MSW lichte in PCB LK Det?		?
	v)	plastic eating bugs			x	possible, no research		?
		nylon, low density PE			x	known plastic eating bugs	yes	yes for now
		HDPE			x	no known biotic threats	yes	yes for now
	(b)	puncture model		x		confusing....see Groundwater model assessment		
	(c)	crack model			x			
	(d)	tensile failure model			x			
	3)	installation method		x				
	4)	installer qualifications		x				

Clinton Landfill PCB application Draft Cklist Dec. 09, smj				EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of June 2010 smj-USEPA									
Technical itemization of elements-completeness				required	present	not present	Reviewer	Adequate	EPA revision
2	slope of cell walls				x				
3	capacity of cell(s)				x				
4	leachate collection system				x				
5	leachate treatment system					x	leachate disposal in POTW or other certified disposer		
6	leak detection system				x				
7	surface water diversion structures				x				
8	cutoff wall(s)				x				
a)	barrier to upper radnor silty sand				x				
9	supporting facilities				x				
a)	security				x				
1)	fence				x				
2)	guard shack				x				
3)	signs				x				
b)	vehicle wash area(s)					x	not noted	ok	
c)	roads				x				
d)	waste acceptance area				x				
c.	Construction planning				x				
1	blueprint of proposed landfill				x				
2	cross section of landfill related to site geology and water table				x				
3	construction timeline/flowchart				NA		not applicable		
a)	cell(s)						not noted		
b)	leachate treatment system						not noted		
c)	surface water diversion structures						not noted		
d)	cutoff walls						not noted		
e)	support facilities						not noted		
4	quality assurance/quality control plan				x				
a)	location/survey control				x				
b)	construction/installation monitoring				x				
c)	material conformance and compatibility						not noted see above		
d)	as-built drawing				x				
e)	PE review and certification statement				x				
							not noted		

Clinton Landfill PCB application Draft Cklist Dec. 09, smj				EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of June 2010 smj-USEPA									
Technical itemization of elements-completeness				required	present	not present	Reviewer	Adequate	EPA revision
2 <i>Operation Plans</i>				x	x				
a.	Waste handling			x	x				
1	PCB waste			x	x		IL Special Waste, reactive sulfide free		
a)	estimated volume				x		per load		
b)	estimated type (soil, transformers, etc.)				x		per load		
2	other waste-MSW				x		not in TSCA cell, adjacent and above		
a)	estimated volume				x		note MSW max. in Non-TSCA part...non-TSCA waste in cell?		
b)	estimated type				x		Coal Gasification plant waste to go in TSCA Cell?		
3	waste acceptance hours			x	x				
4	waste inspection and acceptance (QA/QC)				x				
a)	manifests			x	x				
b)	pre-acceptance screening and sampling				x				
1)	PCB compatibility			x	x		fire risk seems significant in no		to be determined
2)	construction material compatibility					x	construction waste in MSW	no	too inclusive
3)	ignitability				x		methane not expected from TSCA cell		
4)	reactivity				x		not sure of CL's understanding	no	in PCB cell?
5	waste pretreatment				x		request to solidify TSCA waste up to 500 ppm		
6	waste tracking system			x	x				
a)	receipt				x				
b)	location of PCB waste in cell			x	x				
c)	volume of PCB waste				x				
7	maximum holding time before disposal in cell				x				
b	Cell management				x		MSW part to include Methane capture		
1	excavation and backfilling				x				
2	daily cover				x				
a)	material				x			yes	
b)	thickness				x			yes	
3	inspection schedules				x				
4	maintenance plan				x				
3	<i>Traffic</i>				x				
a.	Roadway usage				x				
1	main truck entrance				x				
2	guard shack				x				
3	waste acceptance area				x				
4	truck queue					x			
5	tipping point					x			
6	tipping point turn-around area					x			
7	truck wash station					x			
8	check-out station				x				
9	traffic control signs				x				
b.	Vehicle and equipment movement				x				
1	path to tipping point and turn-around area				x				
2	path out of facility				x				
c.	Roadway maintenance and decontamination				x				

Clinton Landfill PCB application Draft Cklist Dec. 09, smj				EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of June 2010 smj-USEPA									
Technical itemization of elements-completeness				required	present	not present	Reviewer	Adequate	EPA revision
4 <i>Spill Prevention Fire Control and Countermeasures</i>						x	proposal only, existing MSW Pmt. May suffice		
a.	Prevention				x		x		
b.	Spill response				x				
1	emergency				x				
2	non-emergency					x	generic		
c.	Clean-up				x				
1	sampling procedures				x		generic "assessment"	no	25ppm/10ppm/1ppm
a)	pre-clean-up					x	not noted		
b)	clean-up verification					x	not noted		
2	analytical procedures					x	not noted		
3	QA/QC procedures					x	not noted		
4	clean-up levels					x	not noted		
d.	Fire Response				x				
1	extinguishers				x				
2	communications access				x				
3	hydrant access				x		1.7 miles from cell...deemed adequate by local Fire Dept.		
e.	Notification				x		within 24 hrs	ok	
f.	Reporting				x		to Landfill Director, et al.	ok	
5 <i>Worker Protection</i>					x		generic, contingent on		
a.	Health monitoring					x	not noted		
1	exposure monitoring				x			ok	
b.	Protective clothing				x			ok	
c.	Emergency equipment				x		spill/fire plan as above		
d.	Emergency and evacuation plan				x		spill/fire plan as above		
e.	Training				x				
1	PCB waste management				x				
2	environmental monitoring procedures				x				
3	equipment				x		generic		
a)	use/inspection						not noted		
b)	repair/replacement						not noted		
c)	decontamination						not noted		
4	spills				x		generic		
a)	prevention				x				
b)	emergency response				x				
c)	clean-up				x				
d)	notification				x				
5	emergency				x				
a)	emergency co-ordinator(s)				x				
b)	fire/explosion procedures				x				
c)	evacuation route					x	not noted		
d)	location and use of emergency equipment					x	not noted		
e)	location police/fire/hospital information				x			ok	
6	frequency of training				x				
a)	initial				x				
b)	refresher				x				

Clinton Landfill PCB application Draft Cklist Dec. 09, smj			EPA	Information	Informaton	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of june 2010 smj-USEPA								
Technical itemization of elements-completeness			required	present	not present	Reviewer	Adequate	EPA revision
6	Security		x	x				
a.	Vandalism			x				
b.	Unauthorized waste			x				
7	Monitoring and Sampling		x	x		Previously approved by IEPA for site under RCRA D		
a.	Surface water		x	x				
1	pre-operation (background) sampling sites and monitoring schedule		x	x				
2	active operation sampling sites and monitoring schedule		x	x		proposed, TSCA cell not active, other cells mon. for PCBs		
3	sample method		x	x		Annually Shaw, I 7-5		
a)	type		x	x				
b)	sampling equipment		x	x				
1)	description		x	x				
2)	decontamination procedure		x	x				
c)	chain of custody		x	x				
d)	Quality Assurance/Quality Control (QA/QC)		x	x				
4	analysis			x				
a)	lab QA/QC			x				
b)	analysis method			x				
c)	analysis parameters			x				
d)	detection limit			x				
5	detection response			x				
6	remediation standard			x				
7	remediation plan			x		general conditions laid out		
8	reporting and notification schedule		x	x				

Clinton Landfill PCB application Draft Cklist Dec. 09, smj				EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of June 2010 smj-USEPA									
Technical itemization of elements-completeness				required	present	not present	Reviewer	Adequate	EPA revision
b.	Groundwater				x		Existing IEPA permit June 22, 2007 to construct		
1	chemical monitoring: water quality				x				
a)	current and proposed wells				x				
1)	design				x				
(a)	include diagram				x				
(b)	differentiate between current and proposed wells				x		old and new text, see Sec 7 & Sec. M		
2)	location				x				
(a)	include map				x				
(b)	differentiate between current and proposed wells				x		Confusing,		
3)	screened interval (per well)				x				
(a)	depth				x				
(b)	formation				x				
b)	pre-operation (background) sampling sites and			x	x				
	monitoring schedule			x	x				
c)	active operation sampling sites and monitoring schedule				x				
1)	indicator parameters,				x				
2)	51 organic chemicals				x				
3)	PCB				x		background data 4 Q. 2003		
4)	Sample sites				x				
d)	sample method				x				
1)	type				x		bailer		
2)	sampling equipment				x				
(a)	description				x				
(b)	decontamination procedure				x				
3)	chain of custody				x				
4)	Quality Assurance/Quality Control (QA/QC)			x	x				
e)	analysis				x				
1)	lab QA/QC				x				
2)	analysis method				x				
3)	analysis parameters				x				
4)	detection limit				x				
f)	detection				x				
1)	Statistical Test, "Monitor TM", 95% UTL				x				
(a)	Maximum Allowable Pollutant concentration				x				
(b)	Allowable Groundwater Quality Standard				x				
2)	Response action				x				
g)	remediation standard				x				
h)	remediation plan				x				
i)	purge water treatment and disposal			x					
j)	reporting and notification schedule				x				
2	physical monitoring: water quantity..piezometric wells				x				
a)	current and proposed wells				x				
1)	design			x	x				
(a)	include diagram				x				
(b)	differentiate between current and proposed wells				x		contradictory, recycling of MSW app, and GW Anal.see Sec. M		
2)	location				x				
(a)	include map				x				

Clinton Landfill PCB application Draft Cklist Dec. 09, smj			EPA	Information	Informaton	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of june 2010 smj-USEPA								
Technical itemization of elements-completeness			required	present	not present	Reviewer	Adequate	EPA revision
(b)	differentiate between current and proposed wells			x		contradictory, plans and results given		
3)	screened interval (per well)			x				
(a)	depth			x				
(b)	formation			x				
b)	pre-operation (background) sampling sites and		x	x				
	monitoring schedule			x		contradictory, plans and results given (Sec. M,		
c)	active operation sampling sites and monitoring schedule			x				
d)	sample method		x	x		following procedures as published		
1)	sampling equipment			x				

Clinton Landfill PCB application Draft Cklist Dec. 09, smj				EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of june 2010 smj-USEPA									
Technical itemization of elements-completeness				required	present	not present	Reviewer	Adequate	EPA revision
(a)	description				x				
(b)	decontamination procedure				x				
2)	Quality Assurance/Quality Control (QA/QC)			x	x		5-yr survey control		
e)	purge water treatment and disposal					x	not noted		
f)	reporting schedule				x				
c.	Leachate			x	x				
1	monitoring schedule			x	x				
2	reporting and notification schedule			x	x				
3	analysis			x	x				
a)	lab QA/QC			x	x				
b)	analysis method			x	x				
c)	analysis parameters			x	x				
d)	detection limit			x	x				
4	detection response			x	x				
5	remediation standard						recycling leachate		
6	remediation plan			x			recycling leachate		
7	leachate treatment and disposal			x	x		recycling into LF		
d.	Leak detection system				x				
1	monitoring schedule			x	x				
2	detection response			x	x				
3	reporting and notification schedule			x	x				
e.	Truck wash water					x	seperation of roadways, no trackout		
1	treatment					x			
2	disposal					x			
f.	Soil				x		Soil monitoring not noted, see spill response		
1	pre-operation sampling sites and monitoring schedule					x			
2	active operation sampling sites and monitoring schedule					x			
3	analysis					x			
a)	lab QA/QC					x			
b)	analysis method					x			
c)	analysis parameters					x			
d)	detection limit					x			
4	detection response				x				
5	remediation standard					x		no	needs number 25/10/1 ppm
6	remediation plan				x	x			
7	reporting and notification schedule				x				
g.	Air				x		part of existing IEPA approved site Mon. Plan		
1	dust monitoring schedule				x				
a)	pre-operation					x	planned, no data yet		
b)	active operation				x				
2	PCB monitoring schedule				x		only during PCB operations		
a)	pre-operation					x	not planned		
b)	active operation				x		using T0-4 methods, goal...to mon. worst case		
3	detection response				x		0.02		
4	tolerance limit				x				
5	reporting and notification schedule				x				
6	Methane control				x				

Clinton Landfill PCB application Draft Cklist Dec. 09, smj				EPA	Information	Informaton	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of june 2010 smj-USEPA									
Technical itemization of elements-completeness				required	present	not present	Reviewer	Adequate	EPA revision
a)	prohibited activities				x				

Clinton Landfill PCB application Draft Cklist Dec. 09, smj				EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of June 2010 smj-USEPA									
Technical itemization of elements-completeness				required	present	not present	Reviewer	Adequate	EPA revision
b)	gas collection in MSW waste				x		adjacent and above PCB		
1)	gas wells in adjacent subcell				x				
2)	gas wells in overlying subcell				x				
c)	gas monitoring				x				
1)	methane testing				x				
2)	oxygen testing				x				
3)	nitrogen testing				x				
4)	H2S testing?					x	if construction waste...and leachate recycling then H2S likely		
H.	Records Maintenance and Reporting Procedures				x				
	1 <i>Annual Records</i>				x	x			
a.	Waste manifests				x	x			
b.	Certificates of disposal				x	x			
	2 <i>Annual Document Log</i>				x	x			
	3 <i>PCB Concentration in Liquid Waste</i>				x	x			
	4 <i>Three Dimension Burial Coordinates for PCB Waste</i>				x	x			
	5 <i>Record Retention Period</i>				x	x			
	6 <i>Annual Report</i>				x	x			
	7 <i>Notification of PCB Waste Activity (Form #7710-53)</i>					x	not included, to be submitted upon approval		
	8 <i>Exception Reports</i>				x	x			
I.	Closure/Post-Closure Procedures								
	1 <i>Description and Schedule of Closure Activities</i>				x	x			
a.	Construction of final cover					x			
1	description					x			
a)	vegetated layer					x			
1)	top soil source and specifications					NA			
2)	vegetation type					NA			
b)	drainage layer					x			
c)	flexible membrane liner (fml)					x			
1)	thickness					x			
2)	integrity document						planned for closure		
3)	installation method						planned for closure		
4)	installer qualifications						planned for closure		
d)	low permeability layer					x	planned for closure		
e)	gas vent layer					x	planned for closure		
f)	biotic barrier layer					x			
g)	finished grade					x			

Clinton Landfill PCB application Draft Cklist Dec. 09, smj			EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of June 2010 smj-USEPA								
Technical itemization of elements-completeness			required	present	not present	Reviewer	Adequate	EPA revision
2	blueprint of proposed cover			x				
3	construction timeline/flowchart					no time table for closure		
4	quality assurance/quality control plan			x				
a)	location/survey control					under engineering guidance		
b)	construction/installation monitoring			x				
c)	material conformance and compatibility			x				
d)	as-built drawing			x				
e)	PE review and certification statement			x				
b.	Construction of runoff/runon control structures		x	x				
1	description		x	x				
2	construction schedule			NA		completed, approved		
c.	Sampling and decontamination			x				
1	roadways			x		to be maintained clean	yes	
a)	sample locations			x				
b)	analysis			x		in general		
1)	lab QA/QC			x				
2)	analysis method			x				
3)	analysis parameters			x				
4)	detection limit			x				
c)	remediation standard			x		visible mud on road	yes	
2	soil					general spill remediation, industrial site		
a)	sample locations			NA				
b)	analysis			x		in general		
1)	lab QA/QC			x				
2)	analysis method			x				
3)	analysis parameters			x				
4)	detection limit			x				
c)	remediation standard				x	see spill cleanup criteria		
3	truck wash				x	not specific, separation of waste & road		
a)	sample locations				x			
b)	analysis			x		in general		
1)	lab QA/QC			x				
2)	analysis method			x				
3)	analysis parameters			x				
4)	detection limit			x				
c)	remediation standard				x	no	ok	
d.	Removal				x			
1	waste				x	assume maintenance		
2	equipment			x				
3	structures			x				
e.	Financial assurance		x	x			unknown	
1	cost of closure		x	x				
2	funding mechanism		x	x				
3	closure must be funded			x				
	before landfill can accept waste				x	no		
	after receipt of operating authorization			x		yes	IEPA?	not sure

Clinton Landfill PCB application Draft Cklist Dec. 09, smj				EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of June 2010 smj-USEPA									
Technical itemization of elements-completeness				required	present	not present	Reviewer	Adequate	EPA revision
f.	Closure certification				x		not required, but planned		
2	<i>Description and Schedule of Post-Closure Activities</i>			x	x		formal plan exists		
a.	Cover inspection and maintenance				x				
1	inspection schedule				x				
2	maintenance plan and schedule				x				
3	runoff/runon erosion control plan				x				
4	notification and reporting				x				
b.	Sampling and remediation				x				
1	surface water plan				x		runoff, siltation, not Salt Creek		
a)	sampling sites and monitoring schedule					x	runoff designs OK'd, no sampling		
b)	sample method					x			
1)	type					x			
2)	sampling equipment					x			
(a)	description					x			
(b)	decontamination procedure					x			
3)	chain of custody					x			
4)	quality assurance/quality control (QA/QC)					x			
c)	analysis					x			
1)	lab QA/QC					x			
2)	analysis method					x			
3)	analysis parameters					x			
4)	detection limit					x			
d)	detection response					x			
e)	remediation standard					x			
f)	remediation plan					x			
g)	reporting and notification schedule					x			
2	groundwater plan				x		for MSW part Cell #3	IEPA approved	
a)	well inspection and maintenance schedule				x				
b)	well location and monitoring schedule				x				
1)	screened interval (per well)				x				
(a)	depth				x				
(b)	formation				x				
c)	sample method				x		existing GW mon plan.	IEPA Approved	
1)	type				x				
2)	sampling equipment				x				
(a)	description				x				
(b)	decontamination procedure				x				
3)	chain of custody				x				
4)	quality assurance/quality control (QA/QC)				x				
d)	analysis				x				
1)	lab QA/QC				x				
2)	analysis method				x				
3)	analysis parameters				x				
4)	detection limit				x				

Clinton Landfill PCB application Draft Cklist Dec. 09, smj				EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of June 2010 smj-USEPA									
Technical itemization of elements-completeness				required	present	not present	Reviewer	Adequate	EPA revision
e)	detection response				x				
f)	remediation standard				x				
g)	remediation plan				x		contingency plans		
h)	purge water treatment and disposal					no			
i)	reporting and notification schedule				x				
3	leachate collection system				x				
a)	inspection and maintenance				x				
b)	monitoring schedule				x				
c)	reporting and notification schedule				x				
d)	analysis				x				
1)	lab QA/QC				x				
2)	analysis method				x				
3)	analysis parameters				x				
4)	detection limit				x				
e)	detection response				x				
f)	remediation standard				x				
g)	remediation plan				x		contingency plans		
h)	leachate treatment and disposal				x				
4	leak detection system				x				
a)	inspection and maintenance schedule				x				
b)	monitoring schedule				x				
c)	detection response				x				
d)	reporting and notification schedule				x				
c.	Financial assurance			x	x				
1	cost of closure			x	x				
2	funding mechanism				x				
3	post-closure must be funded before landfill can accept waste				x		upon approval to operate		
d.	Post-closure period			x	x				
e.	Notice of completion of post-closure				x				
J.	Application for TSCA Landfill Requirement Waiver					x	no waiver needed...		
K.	Application for Approval Modification				x		IEPA modif. In process, US EPA mod's not planned		
1	60 days prior to proposed changed			NA			not applicable at present time		
2	60 days after unexpected event			NA					

Clinton Landfill PCB application Draft Cklist Dec. 09, smj				EPA	Information	Information	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of june 2010 smj-USEPA									
Technical itemization of elements-completeness				required	present	not present	Reviewer	Adequate	EPA revision
L.	Other Information								
	1 Applicable or Relevant and Appropriate Requirements								
a.	air					x			
b.	water			x					
	1 NPDES stormwater			x	x				
	2 NPDES local sewer discharge					POTW?	Leachate to local POTW...	x	
	3 groundwater discharge				x		Groundwater Impact Anal.	yes	adequate (see below)
c.	state				x				
	1 airport				x				
	2 floodplain				x		100 flood, 100 yr 24 hr storm		
	3 wetlands				x				
	4 fault				x				
	5 instability				x		slope stability work ignores	?	?
	6 resources				x			no	adequate
	7 shallow well water				x		groundwater impact assess	x	adequate
1)	"Migrate" model				x		accepted model generally	yes	adequate
2)	data				x			yes	adequate
3)	criteria			x	x		EPA Interim Final Guidance	yes	adequate
4)	assumptions					x		no	adequate
5)	extrapolations					x		no	adequate
6)	graphs				x			no	adequate
7)	conclusions				x			yes	adequate
8)	sensitivity				x			yes	adequate
9)	setback				x				
	8 coal				x		coal determined to be below	no	Coal not owned by PDC
									"deep" probably subeconomic.
	9 mahomet				x		level of protectiveness of M	no	adequate
1)	migrate					x		no	adequate
2)	data				x			no	adequate
3)	criteria					x		no	adequate
4)	assumptions					x		no	adequate
5)	extrapolations					x		no	adequate
6)	graphs					x		no	adequate
7)	conclusions				x			yes	adequate
8)	sensitivity					x		no	adequate
	10 wild & scenic rivers				x			yes	
	11 archeology				x			yes	
	12 endangered species				x			yes	
	13 water supply wells				x			no	
	14 sole source aquifer				x			yes	
	15 visual impairments				x			yes	
	16 occupied dwellings				x			yes	
	17 natural areas				x			yes	
	18 state parks				x			no	

Clinton Landfill PCB application Draft Cklist Dec. 09, smj					EPA	Information	Informaton	Comments by EPA	Opinion	Remedy
note: all items in bold/red or otherwise flagged have been resolved as of june 2010 smj-USEPA										
Technical itemization of elements-completeness					required	present	not present	Reviewer	Adequate	EPA revision
d.	Clinton LF policy					x				
1	noise control					x			y	
2	spill cleanup					x			y	
3	leachate disposal					x		to POTW from TSCA Cell	y	
4	gas management					x		not clear, too brief,	no	
5	inspections					x				
6	personal protection					x				
7	recordkeeping					x		to abide by TSCA		
8	perpetual care					x				
e.	local					x		see siting permit as modified		
2	Other Permit Applications									
a.	federal						x	none needed		
b.	state					x		Application for Modif. To existing MSW to allow PCB in subcell		
c.	local					x				
3	Issued Permits									
a.	federal									
1						X		NPDES approval		
b.	state					x		MSW licence for Cell 3		
1	Pre Tmt Authoriz/POTW approval						x	POTW for leachate disposal		
2	groundwater					x		MSW cell GW Mon. approved by IEPA		
1)	modification for cell #3					x		pending		
3	deep GW					x		status, pending	no	yes
4	stormwater runoff					x		issued for LF #3		
c.	local					x		Siting permit, DeWitt Co.		
4	Existing and Pending Consent Decrees						x	none for CLI		
a.	CLI						x	unknown		
b.	PDC						x	unknown		
c.	Area Disposal						x	unknown		
5	Compliance History							To be determined		
a.	CLI									
b.	Area Disposal									