US ERA ARCHIVE DOCUMENT

Clinton La	ndfill PCB application D	raft Cklist Dec. 09, smj	EPA		n Informaton	Comments by EPA	Opinion	Remedy
note: all it	ems in bold/red or other	wise flagged have been resolution						
	nical itemization of elem		required	present	not present	Reviewer	Adequate	EPA revision
Α.	Geographic Informat	ion		Х				
	Physical Geography			Х				
a.	site location		X	Х				
		vnship and range	x	Х				
	(7 1/2' USGS Qu			Х				
	latitude and longitude	de		Х				
	legal boundaries		X	Х				
	local zoning status			Х				
b.	site/owner/contractor	information	X		х	needs name of owner, re	ationship with operator data	
	mailing address		Х	Х				
	owner's address an	d telephone number	X		х			
		and telephone number	X	X				
l		and telephone number	Х	Х				
C.	topography		Х	Х				
d.	soil		x	Х				
	engineering classifi		X	Х				
	agricultural classific	ation			х	not necessary		
e.	water			Х				
	closest open water	body	Х	Х		as designated by EPA		
	direction of surface		х	Х		see NPDES permit		
	groundwater rechar		Х	х				
	depth to water table		х	Х				
		/ear) floodplain elevation	х	Х		500 yr flood projections n	ot Req. or present	
f.	wells			X				
,			х	Х		requested more informati		
	closest well water d		х	Х		requested more informati	on	
	injection/withdrawal			Х				
g.	prevailing wind direct	ion (wind rose)			Х	Air monitoring work not p	resent	
h.	local land use			Х				
	present			Х				
a)	industrial			Х				
1)	pipelines			X		County/state permit to ex	cavate suffices	
2)	pump stations			NA				
3)	meter stations			NA				
b)	residential			Х				
1)	within 500'			Х				
2)	recreational			Х				
c)	farms			Х				
d)	highways			Х				
2	2 future				Х	not required		
a)	industrial				х	LF setback zone does no	t restrict new industry	
b)	residential				х	exclusionary zone should	apply to new construction	
c)	farm				x			

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Technical itemization of elements-completeness	required	present	not present	Reviewer	Adequate	EPA revision
2 Environmental Geography		x				
a. location within 100 year flood plain	х	х				
b. endangered species	х	х		State declaration on musse	x	
1 breeding grounds			х	not noted		
2 habitat		х				
c. sensitive areas			х	not noted, apparently none		
1 wetlands	х	х				
2 waterways	х	х				
3 fishing sites			х	none on site		
4 groundwater	x	х				
a) sole source aquifers	x	х				
b) major aquifers	x	х				
5 food and feed areas	x		x	Farming area near PCB site	9	
B. Geologic Information						
1 Regional and Site-Specific Geologic History		х				
2 Physiographic Province		х				
3 Regional and Site-Specific Stratigraphy		х				
4 Site Bedrock Lithology						
a. geologic names		Х		Pennsylvanian	Х	
b. physical description		х			X	
c. depth to top of bedrock		Х				
d. name and depth of next rock unit down				Pennslvanian, No sinkhole	Х	X
5 Material Overlying Top of Rock at Site						
a. physical description	Х	х				
(sand, gravel, glacial till, soil, etc.)	Х					
b. surface soils (engineering classification)	Х	х				
c. subsurface soils (engineering classification)	Х	х				

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C.		Site-specific Hydrogeologic Information						
	1	Water Table						
a.		current		Х				
b.		historical high water table		х		limited to available site dat	a	
C.		hydraulic connection to surface water			Х	Can be inferred from data		
	2	Local Gradient		х				
	3	Nearest Groundwater Recharge Areas			X	Weldon Springs?		
	4	Nearest Aquifer(s)		x				
a.		name		x		L. Radnor, EPA says Mah	Controversy	
b.		depth to top of aquifer		х				
C.		depth to top of water		X				
d.		horizontal distance (if applicable)		x				
e.		characteristics			x	mahomet water supply not	evaluated	
	1			x				
	2	gravel, sand, etc.		x				
	3	confined, unconfined			х	Descriptions exist but little		
	4	quality			x	mahomet water quality not	evaluated	
	5	present and future usage (drinking water)			х	subject of initial notification		
	5	Nearest Aquitard		х		Many, multi-layering		
a.		name		х				
b.		elevation of top		х				
C.		elevation of base		х				
d.		characteristics		х				
	1	thickness		Х				
	2	continuity		х	х	only brief comments about	small sand zones	
	6	Permeability of Geologic Units						
a.		soil		х				
b.		soil/rock interface		Х				
C.		rock			х	Is underlying rock coaly or	a karstic water sink, source	
						, , , , , , , , , , , , , , , , , , , ,		
	7	Groundwater						
a.	-	general flow patterns - Laplace flow net			х	GIA model, graphs poor	no	adequate
b.		piezometric surface		х		, g poo.	adequate	222 4222
		P		-	1			

Clinton	Landfill PCB a	application E	Oraft Cklist E	Dec. 09, smj	EPA	Information	n Informaton	Comments by EPA	Opinion	Remedy
note: al	I items in bold	red or other	wise flagge	d have been reso	lved as of june 2	010 smj-USI	ΕΡΑ		·	
	chnical itemiza				required	present	not present	Reviewer	Adequate	EPA revision
D.	Site Chen	nistry								
	1 PCB Mobi	ilizing Solve	nts							
a.	type					х	х	adjacent to municipal wa	ste, tar/waste gas byprod.	
b.	distribution	distribution				х		not in TSCA cell, but ove	rhead MSW possible	
	2 Other Con	ntaminants				x		In MSW Cell		
a.	type					x		construction waste?		
b.	distribution	on				Х		in MSW Cell		
E.	Site Risks	3								
	1 PCB Mobi	lity				Х			1	
a.	solvents						Х	methane, leachate, fires,	coal gasification waste	
b. c.	floods landslide	0				X		questions regarding LF S	Stability models	
C.	lanusiide	3				^		questions regarding Li	dability models	
	2 Environme	ental				х				
a.	endange	red species				х		"No risk" statement from	State re: Mussel in Salt Ck.	
		g grounds				х		offsite, Salt Ck.		
	2 habitat					x		offsite, Salt Ck.		
b.	sensitive	areas				x				
	1 wetland	ls					x	wedron springs, breakou	ts from Upper Radnor, seeps	
	2 waterwa					Х				
	3 fishing					Х				
	4 ground					х				
a)		e aquifers				Х				
b)		aquifers				х				
	5 food an	d feed areas	S		Х		X	farms nearby, what kind,	impact?	

			raft Cklist Dec. 09, smj	EPA		n Informaton	Comments by EPA	Opinion	Remedy
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	Technical itemiza	ation of elem	ents-completeness	required	present	not present	Reviewer	Adequate	EPA revision
F.	Maps								
	1 Site Map				X				
a.	existing	plat			X				
		oundaries			x				
		ering planime			X				
			onitoring wells)		x				
b.	plat show	wing existing	features plus proposed		х				
	landfil	I cell and lan	dfill support facilities		X				
	2 7 1/2' US	GS Quadran	gle Map		x				
	3 Most Pert	inent Geolog	діс Мар			x	Scales too small, weak on	oublished geologic maps	
	4 Cross Sec	ction			x				
a.	Litho-Str	atigraphic			x		good control		
b.	Soil stre	ngth			X		use of soil lab data for mod	maybe	?
	5 Site Conta					x	Site not contaminated		
a.	PCB cor	ntamination b	oundaries and			x	no data on existing PCB lev	els around site	
	distrib	oution (PCB	concentration)			x			
	1 plan vie					x			
	2 cross section					х			
		il units affect	ted			x			
		(s) affected				x			
b.	other co	ntaminant bo	oundaries and distribution	1		x			

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Techr	nical itemization of elem-	ents-comple	eteness	required	present	not present	Reviewer	Adequate	EPA revision
G.	Landfill Technical Re	quirement	S			,			
		-							
1	General Site Plan				х				
a.	Landfill location				х				
1	soil type				Х				
2	distance from water	table			Х				
3			od plain		Х				
4					Х				
5	distance from groun	dwater rech	narge areas			x	karst, lakes, none in immed	liate area	
6					х				
b.	Design features				Х				
1					Х				
a)	large-area clay pa	an				x	Exists but no effort to make	claim	
1)	thickness				Х				
2)	extent					x	Looked some of it up myse	lf	
3)	properties				Х				
4)	liner/leachate c	ompatibility			Х		Mfg's statements only, biod	compatible?	
b)	in-place soil				Х				
1)	thickness				Х				
2)	properties				Х				
3)	liner/leachate c								
c)	compacted soil lin	er			Х				
1)	thickness				Х				
2)	properties				Х				
3)	liner/leachate c					Х			
4)	installation met				Х				
d)	synthetic membra	ne liner(s)			Х				
1)	thickness				Х				
(a)	membrane				Х				
(b)	soil underlinin		cover		Х				
2)	integrity docume				х		no plan to minimize risks	no	
(a)	liner/leachate		ty		Х		articles, mfg. data only	no	needs bio work
i)	HDPE liner				Х		HDPE generally	yes	suggest more
ii)		eference ar			х			no	HDPE State of Art?
iii)	physical ch				х		EPA Ad Hoc opinion OK?		?
		minimization	on			x	keep water on plastic?		?
iv)	biochem co					x	MSW Ichte in PCB LK Det?)	?
v)		iting bugs				x	possible, no research		?
		ow density	PE			x	known plastic eating bugs		yes for now
	HDPE					x	no known biotic threats	yes	yes for now
(b)	puncture mod	el			Х		confusingsee Groundwa	ter model assessment	
(c)	crack model					x			
(d)	tensile failure					х			
3)	installation meth				Х				
4)	installer qualifica	ations			x				

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	n of elements-comp		required	present	not present	Reviewer	Adequate	EPA revision
2 slope of c	ll walls			X				
3 capacity of	cell(s)			х				
4 leachate	ollection system			х				
5 leachate	eatment system				х	leachate disposal in POTV	V or other certified disposer	
6 leak dete	tion system			х				
7 surface w	ter diversion structu	ıres		х				
8 cutoff wal	s)			х				
a) barrier t	upper radnor silty	sand		х				
9 supporting	facilities			х				
a) security				х				
1) fence				х				
2) guard	shack			х				
3) signs				х				
b) vehicle	ash area(s)				х	not noted	ok	
c) roads				х				
d) waste a	ceptance area			х				
c. Construction				х				
1 blueprint	f proposed landfill			x				
	on of landfill related	I to site geology		х				
and w	iter table			х				
3 constructi	n timeline/flowchart	t		NA		not applicable		
a) cell(s)						not noted		
b) leachate	treatment system					not noted		
	vater diversion struc	ctures				not noted		
d) cutoff w						not noted		
e) support						not noted		
4 quality as	urance/quality conti	rol plan		х				
	survey control			х				
b) constru	construction/installation monitoring							
c) materia	conformance and c	ompatibility				not noted see above		
d) as-built				х				
e) PE revi	w and certification s	statement		x				
						not noted		

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Techn	cal itemization of elements	s-completeness	required	present	not present	Reviewer	Adequate	EPA revision
2	Operation Plans		х	х				
a.	Waste handling		х	х				
1	PCB waste		х	х		IL Special Waste, reactive	e sulfide free	
a)	estimated volume			х		per load		
b)	estimated type (soil, tr	ransformers, etc.)		х		per load		
2				х		not in TSCA cell, adjacent	and above	
a)	estimated volume			х		note MSW max. in Non-T	SCA partnon-TSCA waste in	cell?
b)	estimated type			х		Coal Gasification plant wa	iste to go in TSCA Cell?	
3		rs .	х	х				
4	waste inspection and a	cceptance (QA/QC)		х				
a)	manifests		х	х				
b)	pre-acceptance scree	ning and sampling		х				
1)	PCB compatibility		х	Х		fire risk seems significant	inno	to be determined
2)	construction material	I compatibility			х	construction waste in MS\		too inclusive
3)	ignitability			х		methane not expected fro		
4)	reactivity			Х		not sure of CLI's understa		in PCB cell?
5	waste pretreatment			х		request to solidify TSCA v	vaste up to 500 ppm	
6			х	х				
a)	receipt			х				
b)	location of PCB waste	e in cell	x	х				
c)	volume of PCB waste)		х				
	maximum holding time	before disposal in cel	I	х				
b	Cell management	'		х		MSW part to include Meth	ane capture	
1		ing		х		•	·	
2				х				
a)	material			х			ves	
b)	thickness			х			ves	
3	l l			х				
4				х				
	·							
3	Traffic			х				
	Roadway usage			X				
	main truck entrance			X				
	guard shack			X	1			
	waste acceptance area			X				
	truck queue				х			
	tipping point				x			
	tipping point turn-around	larea			X			
7	truck wash station				x			
	check-out station			х	1			
	traffic control signs			X				
	Vehicle and equipment m	ovement		X	+			
	path to tipping point and			X				
2	path out of facility	ta diodila diod		X				
	Roadway maintenance ar	nd decontamination		X				
v .	Tiodaway mamicinanoc ai	ia accontamination		^				

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Ted	chnical itemization of eleme	ents-completeness		required	present	not present	Reviewer	Adequate	EPA revision
	4 Spill Prevention Fire Co		asures	•		x	proposal only, existing MSV		
a.	Prevention				х		x	, , , , , , , , , , , , , , , , , , , ,	
b.	Spill response				x				
	1 emergency				X				
	2 non-emergency				^	х	generic		
C.	Clean-up				х	^	generic		
С.	1 sampling procedures				X		generic "assessment"	no	25ppm/10ppm/1ppm
۵)	pre-clean-up				^	x	not noted	110	23ррий торрий тррии
a) b)	clean-up verification					x	not noted		
D)	2 analytical procedures					X	not noted		
	3 QA/QC procedures								
						х	not noted		
.	4 clean-up levels					х	not noted		
d.	Fire Response				х				
	1 extinguishers				Х				
	2 communications acces	S			х				
	3 hydrant access				х		1.7 miles from celldeeme	d adequate by local Fire Dept.	
e.	Notification				Х		within 24 hrs	ok	
f.	Reporting				x		to Landfill Director, et al.	ok	
	5 Worker Protection				х		generic, contingent on		
a.	Health monitoring					х	not noted		
	1 exposure monitoring				х			ok	
b.	Protective clothing				х			ok	
c.	Emergency equipment				х		spill/fire plan as above		
d.	Emergency and evacua				х		spill/fire plan as above		
e.	Training				х				
	PCB waste managem	nent			X				
	2 environmental monito	ring procedures			X				
	3 equipment	ing procedures			X		generic		
a)	use/inspection				^		not noted		
b)	repair/replacement						not noted		
c)	decontamination				1		not noted		
·)	4 spills				х	+	generic		
3)	prevention				X	+	generic		
a) b)		2			X				
,	emergency response	5							
c)					X				
d)	notification				X				
_ \	5 emergency	-4(-)			X				
a)	emergency co-ordina	ator(s)			Х	1			
b)	fire/explosion proced	dures			Х				
c)	evacuation route				1	Х	not noted		
d)		emergency equipment			1	Х	not noted		
e)	location police/fire/ho	ospital information			х			ok	
	6 frequency of training				х				
a)	initial				x				
b)	refresher				х				

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Technical itemization	of elements-complet	teness	required	present	not present	Reviewer	Adequate	EPA revision		

Clintor	n I ar	ndfill PCB application D)raft Cklist Γ	Dec 09 smi	EPA	Information	n Informaton	Comments by EPA	Opinion	Remedy
note: a	all ite	ms in bold/red or other	wise flagge	d have been resolved				Comments by Er 70	Ориноп	rtemedy
		ical itemization of elem			required	present	not present	Reviewer	Adequate	EPA revision
		Security			X	x				
a.		Vandalism				X				
b.		Unauthorized waste				х				
	7	Monitoring and Sampl	ling		х	х		Previously approved by IEF	PA for site under RCRA D	
a.	Surface water				х	х				
	1	pre-operation (backg	round) sam	pling sites	х	х				
		and monito	oring schedu	ule	х	х				
	2	active operation sam	pling sites a	and	x	x		proposed, TSCA cell not ac	ctive, other cells mon. for PCBs	
		monitoring	schedule		x	x		Annually Shaw, I 7-5		
	3	sample method			x	x				
a)		type			X	х				
b)		sampling equipmen	t		X	х				
1)		description			х	х				
2)		decontamination p	rocedure		х	Х				
c)		chain of custody			X	х				
d)		Quality Assurance/0	Quality Con	trol (QA/QC)	х	х				
	4	analysis				х				
a)		lab QA/QC				х				
b)		analysis method				х				
c)		analysis parameters	S			х				
d)		detection limit				х				
	5					Х				
	6	remediation standard	j			Х				
	7	remediation plan				Х		general conditions laid out		
	8	reporting and notifica	tion schedu	ıle	Х	Х				

Clinton Lan	dfill PCB application D	raft Cklist D	ec 09 sm	i	EPA	Information	Informaton	Comments by EPA	Opinion	Remedy
	ms in bold/red or other							Comments by El 71	Ориноп	remedy
Techni	cal itemization of elem-	ents-comple	eteness	II ICSOIVCU	required	present	not present	Reviewer	Adequate	EPA revision
	Groundwater	Citto compi	51011033		required	Х	not present	Existing IEPA permit June 2		El // Tevision
1	chemical monitoring:	water quali	tv			X		Existing IEI A permit suite 2	22, 2007 to construct	
a)	current and propose		ιy			X				
		eu wells				X				
1)	design									
(a)	include diagram					X		ald and navy taxt and Con-	7 9 Can M	
(b)	differentiate bet	ween currer	it and prop	osea wells		X		old and new text, see Sec 7	& Sec. IVI	
2)	location					X				
(a)	include map					Х		0 ()		
(b)	differentiate bety		nt and prop	osea wells		X		Confusing,		
3)	screened interval (per well)				Х				
(a)	depth					Х				
(b)	formation					Х				
b)	pre-operation (back			and	X	Х				
		monitoring			X	Х				
c)	active operation san		and monito	oring sched	ule	х				
1)	indicator paramete					X				
2)	51 organic chemic	cals				X				
3)	PCB					X		background data 4 Q. 2003		
4)	Sample sites					X				
d)	sample method					х				
1)	type					х		bailer		
2)	sampling equipme	ent				х				
(a)	description					х				
(b)	decontamination	procedure				х				
3)	chain of custody					х				
4)	Quality Assurance	/Quality Cor	ntrol (QA/Q	C)	x	х				
e)	analysis	,	((х				
1)	lab QA/QC					x				
2)	analysis method					x				
3)	analysis paramete	rs				x				
4)	detection limit					x				
f)	detection					x				
1)	Statistical Test, "M	lonitor TM"	95% LITI			X				
(a)	Maximum Allowa			ation		X				
(a) (b)	Allowable Groun					X				
2)	Response action	uwalti Qua	iiity Stariua	u		X				
	remediation standard	4				X				
g)	remediation plan	u				X				
h)		nt and diam	neal .		v	X				
1)	purge water treatme				Х					
J)	reporting and notifica			ataiaII-		X				
2		water quant	ııypıezom	etric wells		X				
a)	current and propose	eu weils				Х				
1)	design				X	Х				
(a)	include diagram			L		Х				
(b)	differentiate betw	veen curren	t and propo	sed wells		Х		contradictory, recycling of N	ISW app, and GW Anal.see Sec. N	/1
2)	location					Х	1			
(a)	include map					X				

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Techni	Technical itemization of elements-completeness required						Reviewer	Adequate	EPA revision
(b)	differentiate betw	een curren	t and proposed wells		Х		contradictory, plans and re	<mark>s</mark> ults given	
3)	screened interval (per well)				х				
(a)	depth				x				
(b)	formation				х				
b)	pre-operation (backg	ground) san	npling sites and	х	x				
	monitoring :				Х		contradictory, plans and results given (Sec. M,		
c)	active operation sam	npling sites	and monitoring sched	ule	х				
d)	sample method x				х		following procedures as pu	ıblished	
1)	sampling equipmer	nt			Х			_	

note all terms in boldried or otherwise flagged have been resolved as of june 2010 smj USEFA (a) description v	Clinton	Landfill PCB application Draft Cklist Dec. 09, sn	ni .	EPA	Informatio	n Informaton	Comments by EPA	Opinion	Remedy
Technical itemization of elements completeness (a) description (b) description	Cilliton	itama in hald/rad or otherwise flagged have be	lj op rooolvod				Confinents by EPA	Opinion	Remedy
(a) description (b) deconfamination procedure X	note: all	thems in bold/red or otherwise hagged have be	en resolved				Poviouer	Adaguata	EDA rovicion
(b) decontamination procedure x x 5-yr survey control 2) Quilly Assurance/Collably Control (CAVC) x x x 6) purge water treatment and disposal x x 6. Leachate x x 7. reporting schedule x x 7. reporting schedule x x 7. reporting and notification schedule x x 8. recycling leachate x x 9. recycling				required	•	not present	Reviewei	Adequate	EPA TEVISION
2		description							
Durge water treatment and disposel		Ovelity Assurance (Ovelity Control (OA)	201				E va cumunu control		
		Quality Assurance/Quality Control (QA/C	(JC)	X	X		, ,		
Leachate						X	not noted		
1 monitoring schedule									
2 reporting and notification schedule	C.			X					
3 analysis				Х	_				
a) lab QA/CC				Х					
Dianglysis parameters X				Х					
c) danalysis parameters				Х					
detection limit				Х					
4 detection response x x x recycling leachate r	-			Х	_				
Formediation standard Form	d)			Х					
6 remediation plan	ļ			X	Х				
Teleschate treatment and disposal X									
Leak detection system				^					
1 monitoring schedule				х			recycling into LF		
2 detection response	d.								
e. Truck wash water				Х	~				
e. Truck wash water				Х	Х				
Treatment				Х	X				
f. Soil pre-operation sampling sites and monitoring schedule	e.					x	seperation of roadways, no	trackout	
f. Soil x Soil x Soil x Soil x Soil monitoring not noted, see spill response x Soil monitoring not noted, see spill response x Soil monitoring schedule x Soil monitoring not noted, see spill response x Soil monitoring not noted, see spill noted x Soil monitoring noted, see spill noted x Soil m						Х			
pre-operation sampling sites and monitoring schedule X		2 disposal				x			
2 active operation sampling sites and monitoring schedule X X X X X X X X X	f.				x		Soil monitoring not noted, s	see spill response	
3 analysis						x			
a) lab QA/QC			ring schedu	le		x			
b) analysis method c) analysis parameters		3 analysis				х			
c) analysis parameters	a)	lab QA/QC				x			
d) detection limit	b)	analysis method				х			
4 detection response	c)	analysis parameters				х			
S remediation standard S X S NO Needs number 25/10/1 ppm	d)	detection limit				х			
S remediation standard S X S NO Needs number 25/10/1 ppm		4 detection response			Х				
6 remediation plan						х		no	needs number 25/10/1 ppm
7 reporting and notification schedule					Х	х			
g. Air x part of existing IEPA approved site Mon. Plan 1 dust monitoring schedule x part of existing IEPA approved site Mon. Plan a) pre-operation x planned, no data yet b) active operation x only during PCB operations a) pre-operation x not planned b) active operation x using T0-4 methods, goalto mon. worst case 3 detection response x 0.02 4 tolerance limit x 0.02 5 reporting and notification schedule x W					Х				
1 dust monitoring schedule x planned, no data yet a) pre-operation x planned, no data yet b) active operation x only during PCB operations a) pre-operation x not planned b) active operation x using T0-4 methods, goalto mon. worst case 3 detection response x 0.02 4 tolerance limit x 0.02 5 reporting and notification schedule x w	g.	Air			Х		part of existing IEPA appro	ved site Mon. Plan	
a) pre-operation									
b) active operation x only during PCB operations 2) PCB monitoring schedule x only during PCB operations a) pre-operation x not planned b) active operation x using T0-4 methods, goalto mon. worst case 3 detection response x 0.02 4 tolerance limit x x 5 reporting and notification schedule x x	a)					х	planned, no data yet		
2 PCB monitoring schedule x only during PCB operations a) pre-operation x not planned b) active operation x using T0-4 methods, goalto mon. worst case 3 detection response x 0.02 4 tolerance limit x x 0.02 5 reporting and notification schedule x x 0.02	b)				Х				
a) pre-operation x not planned b) active operation x using T0-4 methods, goalto mon. worst case 3 detection response x 0.02 4 tolerance limit x x 5 reporting and notification schedule x x					х		only during PCB operations	s	
b) active operation x using T0-4 methods, goalto mon. worst case 3 detection response x 0.02 4 tolerance limit x x 5 reporting and notification schedule x x s s s s s s s s s s s s s s s s s	a)					х			
3 detection response	b)				х			to mon. worst case	
4 tolerance limit x x 5 reporting and notification schedule x x	F'								
5 reporting and notification schedule x							0.02		
		6 Methane control							

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

Clinton La	ndfill PCB application Draft Cklist Dec.	. 09, smj EPA	Informatio	n Informaton	Comments by EPA	Opinion	Remedy
noto: all ite	ems in bold/red or otherwise flagged ha				Comments by EFA	Opinion	Remedy
Techr	ical itemization of elements-completer	ness required	present	not present	Reviewer	Adequate	EPA revision
b)	gas collection in MSW waste	Х	not present	adjacent and above PCB	Nacquate	El /(Tevision	
1)	gas wells in adjacent subcell	X		adjacent and above 1 OB			
2)	gas wells in overlying subcell		X				
c)	gas monitoring		X				
1)	methane testing		X				
2)	oxygen testing		X				
3)	nitrogen testing		х				
4)	H2S testing?			x	if construction wasteand	leachate recycling then H2S likely	
,							
H.	Records Maintenance and Reporting	ng Procedures	Х				
1	Annual Records	x	х				
a.	Waste manifests	x	Х				
b.	Certificates of disposal	x	Х				
2	Annual Document Log	x	Х				
3	PCB Concentration in Liquid Waste	x	Х				
	T 5: : 5 : : 6 : : :	6 808 147 7					
4	Three Dimension Burial Coordinates	for PCB Waste x	Х				
_							
5	Record Retention Period	X	Х				
	Annual Danari						
Ь	Annual Report	X	Х				
ļ	Notification of PCB Waste Activity (Fo	orm #7710 52)		x	not included, to be submitted	ad upon approval	
	Notification of FCB waste Activity (FC	5/11/ #77 10-33)		^	not included, to be submitted	за проп арргочаг 	
8	Exception Reports	x	х				
	Exception Reports						
I.	Closure/Post-Closure Procedures						
1	Description and Schedule of Closure	Activities x	х				
a.	Construction of final cover		X				
	description		X				
a)	vegetated layer		х				
1)	top soil source and specifications	3	NA				
2)	vegetation type		NA				
b)	drainage layer		х				
c)	flexible membrane liner (fml)		Х				
1)	thickness		Х				
2)	integrity document				planned for closure		
3)	installation method				planned for closure		
4)	installer qualifications				planned for closure		
d)	low permeability layer		Х		planned for closure		
e)	gas vent layer		Х		planned for closure		
f)	biotic barrier layer		Х				
g)	finished grade		X				

Clinton La	indfill PCB application Draft Cklist D	Dec. 09, smj EPA	Information	Informaton	Comments by EPA	Opinion	Remedy
note: all it	ems in bold/red or otherwise flagge	d have been resolved as of june 2			Commonto by El 71	ope.	. toeu,
Techr	nical itemization of elements-comple	eteness required	present	not present	Reviewer	Adequate	EPA revision
	blueprint of proposed cover		X	ot procent		, radiants	
	3 construction timeline/flowchart				no time table for closure		
		nlan	x		THE LABIC TO CLOSULE		
a)	location/survey control	pian	^		under engineering guidance	9	
b)	construction/installation monito	ring	х		under engineering guidanc	le T	
c)	material conformance and com		X				
d)	as-built drawing	patibility	X				
e)	PE review and certification stat	oment	X				
b .	Construction of runoff/runon contr		X				
D.			X				
		X	NA		completed approved		
	construction schedule				completed, approved		
C.	Sampling and decontamination		X		to be registed I -l	1	
	roadways		X		to be maintained clean	yes	
a)	sample locations		Х				
b)	analysis		x		in general		
1)	lab QA/QC		х				
2)	analysis method		х				
3)	analysis parameters		Х				
4)	detection limit		х				
c)	remediation standard		х		visible mud on road	yes	
2	2 soil				general spill remediation, in	ndustrial site	
a)	sample locations		NA				
b)	analysis		x		in general		
1)	lab QA/QC		x				
2)	analysis method		х				
3)	analysis parameters		х				
4)	detection limit		х				
c)	remediation standard			х	see spill cleanup criteria		
3	3 truck wash			х	not specific, seperation of	waste & road	
a)	sample locations			х			
b)	analysis		х		in general		
1)	lab QA/QC		х				
2)	analysis method		х				
3)	analysis parameters		x				
4)	detection limit		x				
c)	remediation standard			х	no	ok	
d.	Removal			X			
-	l waste			x	assume maintenance		
	2 equipment		x				
	3 structures		x				
e.	Financial assurance	x	x			unknown	
1		x x	x			on the second	
	2 funding mechanism	x	X				
	B closure must be funded	^	X				1
	before landfill can acc	ent waste	^	х	no		
		•	х	^		IEPA?	not ouro
ļ	after receipt of operati	ny authorization	X	1	yes	IEFA!	not sure

Clinton Lar	ndfill PCB application Draft Cklis	t Dec 09 smi	EPA	Informatio	n Informaton	Comments by EPA	Opinion	Remedy
note: all ite	ms in bold/red or otherwise flag	ned have been resolved				Comments by Er A		Tomody
Techn	ical itemization of elements-con	nleteness	required	present	not present	Reviewer	Adequate	EPA revision
f.	Closure certification	.p.o.o	. oqu ou	Х	ct procent	not required, but planned	, tacquate	
						not required, but planned		
2	Description and Schedule of Po	ost-Closure Activities	x	х		formal plan exists		
a.	Cover inspection and maintena		^	X		Torritar plair exists		
	inspection schedule	illoc		X				
	maintenance plan and schedu	ıle		X				
3	runoff/runon erosion control p	lan		X				
	notification and reporting	lait		X				
b.	Sampling and remediation			X				
	surface water plan			x		runoff, siltation, not Salt C	rook	
a)	sampling sites and monitoring	a schedule		<u> </u> ^	x	runoff designs OK'd, no sa		
b)	sample method	g soricadic			X	ranon acoigns circu, no sa		
1)	type			+	X			
2)	sampling equipment				X			
(a)	description				x			
(b)	decontamination procedu	ıre			X			
3)	chain of custody				x			
4)	quality assurance/quality of	ontrol (OA/OC)			x			
c)	analysis	ontrol (QA/QO)			×			
1)	lab QA/QC				×			
2)	analysis method				×			
3)	analysis parameters				X			
4)	detection limit				X			
d)	detection response				X			
e)	remediation standard				x			
f)	remediation plan				X			
g)	reporting and notification sch	nedule			x			
	groundwater plan	icalic		х	^	for MSW part Cell #3	IEPA approved	
a)	well inspection and maintena	ance schedule		X		To Move part och #0	ILI 7 approved	
b)	well location and monitoring	schedule		X				
1)	screened interval (per well)		X				
(a)	depth	/		X		1		
(b)	formation			X				
c)	sample method			X		existing GW mon plan.	IEPA Approved	
1)	type			X		CAISING OVV MON Plant.	in it it is a second	
2)	sampling equipment			x				
(a)	description			X				
(b)	decontamination procedu	ıre		X		1		
3)	chain of custody	A1 0		x		1		
4)	quality assurance/quality of	ontrol (QA/QC)		X				
d)	analysis			X		1		
1)	lab QA/QC			X				
2)	analysis method			X		1		
3)	analysis parameters			X		1		
4)	detection limit			X				
_ - //	actedion min			^				

note: all item	dfill PCB application Dr ns in bold/red or other cal itemization of eleme			EPA	Information			Opinion	
Technic	-1 :t:ti		nave been resolved a	as of june 20			Comments by EPA	- P	Remedy
	al itemization of eleme	ents-complet	eness	required	present	not present	Reviewer	Adequate	EPA revision
	detection response		0.1000	. oqu ou	X	not procent	1101101101	radquate	
f)	remediation standard	d			x				
g)	remediation plan	-			X		contingency plans		
h)	purge water treatme	nt and dispo	sal			no	commigency plane		
i)	reporting and notifica				x				
3	leachate collection sy				x				
a)	inspection and main				x				
b)	monitoring schedule				x				
c)	reporting and notifica		le		x				
d)	analysis		-		x				
1)	lab QA/QC				X				
2)	analysis method				X				
3)	analysis parameter	s			х				
4)	detection limit				х				
e)	detection response				х				
f)	remediation standard	d			х				
g)	remediation plan				х		contingency plans		
h)	leachate treatment a	nd disposal			х		<u> </u>		
4	leak detection system				х				
a)	inspection and main		edule		х				
b)	monitoring schedule				х				
c)	detection response				х				
d)	reporting and notifica	ation schedu	le		х				
c. F	inancial assurance			х	х				
1	cost of closure			х	х				
2	funding mechanism				х				
	post-closure must be	funded before	re landfill can accept	waste	x		upon approval to operate		
d. P	Post-closure period			Х	x				
	Notice of completion of	post-closure	Э		х				
J. A	Application for TSCA	Landfill Re	quirement Waiver			х	no waiver needed		
K. A	Application for Appro	val Modific	ation		х		IEPA modif. In process, US	S EPA mod's not planned	
								·	
1 6	60 days prior to propos	ed changed		NA			not applicable at present ti	me	
2 6	60 days after unexpect	ed event		NA					

Clinto	n Landfill PCB application D	raft Cklist Dec. 09, smj	EPA		n Informaton	Comments by EPA	Opinion	Remedy
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	echnical itemization of elem	ents-completeness	require	d present	not present	Reviewer	Adequate	EPA revision
L.	Other Information							
	1 1 1 5 1		. ,					
	1 Applicable or Relevant	t and Appropriate Requ	irements					
a.	air				X			
b.	water 1 NPDES stormwater		X X					
	2 NPDES local sewer of	diacharga	X	X	POTW?	Leachate to local POTW	v	
	3 groundwater discharg			x	POTVY	Groundwater Impact Anal.	X VOC	adaguata (aga balaw)
•	state	ge		X		Groundwater Impact Ariai.	yes	adequate (see below)
c.	1 airport			X				
	2 floodplain			X		100 flood, 100 yr 24 hr stor	 m	
	3 wetlands			X		100 1100d, 100 yr 24 fir 3tor		
	4 fault			X	- 			
	5 instability			X		slope stability work ignores	?	?
	6 resources			x		c.cpc clabinly work ignores	no	adequate
	7 shallow well water			x		groundwater impact assess		adequate
1)	"Migrate" model			x		accepted model generally	yes	adequate
2)	data			x		accepted model generally	ves	adequate
3)	criteria		х	X		EPA Interim Final Guidance	7	adequate
4)	assumptions				х		no	adequate
5)	extrapolations				x		no	adequate
6)	graphs			х			no	adequate
7)	conclusions			х			ves	adequate
8)	sensitivity			х			yes	adequate
9)	setback			х				•
	8 coal			х		coal determined to be below	no	Coal not owned by PDC
								"deep" probably subeconomic
	9 mahomet			Х		level of protectiveness of M	no	adequate
1)	migrate				х		no	adequate
2)	data			х			no	adequate
3)	criteria				х		no	adequate
4)	assumptions				x		no	adequate
5)	extrapolations				х		no	adequate
6)	graphs				х		no	adequate
7)	conclusions			х			yes	adequate
8)	sensitivity				х		no	adequate
	10 wild & scenic rivers			х			yes	
	11 archeology			х			yes	
	12 endangered species			х			yes	
	13 water supply wells			х			no	
	14 sole source aquifer			х			yes	
	15 visual impairments			Х			yes	
	16 occupied dwellings			х			yes	
	17 natural areas			х			yes	
	18 state parks			X			no	

note: all terms in bold/red or otherwise flagged have been resolved as of june 2010 smj-USEPA Technical termization of elements-completeness required present not present	Clinton	Landfill PCB a	pplication D	raft Cklist Dec. 09, smj	EPA	Informatio	n Informaton	Comments by EPA	Opinion	Remedy
Technical ternization of elements-completeness required present not present Reviewer Adequate EPA revision	note: a	II items in bold/	red or other	wise flagged have bee					- P	
1 noise control								Reviewer	Adequate	EPA revision
1 noise control	d.	Clinton LF	policy		· ·	x	·			
3 leachate disposal						х			V	
3 leachate disposal		2 spill clear	nup			х			V	
S inspections						х		to POTW from TSCA Cell	V	
S inspections		4 gas mana	agement			х		not clear, too brief,	no	
A						х		,		
Tecordkeeping		6 personal	protection			х				
S perpetual care						х		to abide by TSCA		
2 Other Permit Applications						x		,		
2 Other Permit Applications	e.					х		see siting permit as modifie	ed	
a. federal Image: contraction of the contraction o								<u> </u>		
a. federal Image: contraction of the contraction o		2 Other Pen	nit Applicati	ons						
b. state	a.						х	none needed		
c. local </td <td>b.</td> <td>state</td> <td></td> <td></td> <td></td> <td>x</td> <td></td> <td>Application for Modif. To ex</td> <td>sisting MSW to allow PCB in subcell</td> <td></td>	b.	state				x		Application for Modif. To ex	sisting MSW to allow PCB in subcell	
a. federal I	c.	local				x				
a. federal I										
1		3 Issued Per	rmits							
1	a.	federal								
b. state </td <td></td> <td>1</td> <td></td> <td></td> <td></td> <td>Х</td> <td></td> <td>NPDES approval</td> <td></td> <td></td>		1				Х		NPDES approval		
2 groundwater x MSW cell GW Mon. approved by IEPA 1) modification for cell #3 x pending 3 deep GW x x 4 stornwater 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 x Area Disposal x x unknown 5 Compliance History x To be determined a. CLI To be determined	b.	state				x				
2 groundwater x MSW cell GW Mon. approved by IEPA 1) modification for cell #3 x pending 3 deep GW x x 4 stornwater 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 x Area Disposal x x unknown 5 Compliance History x To be determined a. CLI To be determined		1 Pre Tmt /	Authoriz/PO	TW approval			х	POTW for leachate disposa		
1) modification for cell #3 x pending no yes 3 deep GW x x status, pending no yes 4 stormwater runoff x issued for LF #3 x status, pending no yes c. local x Siting permit, DeWitt Co. x yes yes 4 Existing and Pending Consent Decrees x none for CLI yes yes a. CLI x unknown yes yes b. PDC x yes yes yes c. Area Disposal x unknown yes 5 Compliance History yes yes yes yes a. CLI yes yes yes yes y yes yes yes yes y						x				
4	1)			#3		х		pending		
4 stormwater runoff x issued for LF #3 c. local	,	3 deep GW	1			x		status, pending	no	yes
A Existing and Pending Consent Decrees		4 stormwat	er runoff			х		issued for LF #3		
A Existing and Pending Consent Decrees	c.	local				х		Siting permit, DeWitt Co.		
a. CLI S S Unknown S b. PDC S S Unknown S c. Area Disposal S S Unknown S a. CLI S S S Compliance History S S S To be determined a. CLI S S S S S S S S										
a. CLI Image: CLI of the control of the		4 Existing ar	nd Pending	Consent Decrees			х	none for CLI		
b. PDC Image: Control of the contr	a.						х	unknown		
c. Area Disposal x unknown 5 Compliance History 3 4 5 To be determined a. CLI 5 5 1	b.						х	unknown		
a. CLI	C.	Area Dispo	sal				х	unknown		
a. CLI										
a. CLI		5 Compliano	e History					To be determined		
	a.		,							
	b.	Area Dispo	osal							