

US EPA ARCHIVE DOCUMENT

Clinton Landfill Regulatory Checklist										11/13/08					
All issues have been resolved...smj, 2010											Meets TSCA	reasons	Meets R5	reasons	
<b>761.75 Chemical Waste Landfill</b>															
<b>(a) General Requirements</b>															
Landfills must be approved by EPA Regional Admin. According to (c.)												x			
Landfill must meet all requirements unless waived per (c.)(4)												x			
Landfill must meet all other requirements as prescribed.												x			
<b>(b) TSCA 761.75 Technical Requirements</b>															
<b>1) Soil</b>											TSCA Reg		R5 Req.		
<b>761.75 (b) (1) thick, relatively impermeable, large-area clay pan</b>											x	multipans	x	very good	
if not possible,														unusually thick	
then a high clay and silt content (>30%) soil with these parameters:														footprint located in best part of LF	
4 feet thick in-place soil liner---Berry Clay											no	thickness 2-5'	yes	EPA determin.	
permeability #10-7 cm/sec,											x		x		
liquid limit >30,											x		x		
plasticity index >15											x		x		
or 3 feet thick compacted soil liner,											x		x		
permeability #10-7 cm/sec,											x		x		
liquid limit >30,											no	out of spec	waiver	rests on	
plasticity index >15											no	out of spec	waiver	berry clay	
<b>2) Synthetic Membrane Liner</b>															
<b>761.75 (b) (2)</b>															
use when hydrologic and/or geologic conditions require such to achieve soil permeability equivalent to (b)(1)															
30 mils minimum thickness											x		x		
adequate soil underlining and soil cover											x		x		
chemically compatible with PCBs											x		? Biochem		
prevent excessive stress on liner											x	sliding calc's	probably	used pocket penetrometer +F.S.	
prevent rupture of liner											x	sliding calc's	probably	used pocket penetrometer +F.S.	
<b>761.75 (b) (3) Hydrologic Conditions</b>															
bottom of landfill liner system or natural in-place liner must be at least 50 feet from "historical high water table"											x	Mahomet	x	Mahomet	
avoid floodplains, shorelands, groundwater recharge areas											x	no GW Rech.	x	Protected Aq no sinkholes	
no hydraulic connection between site and standing or flowing surface waters											x	Protected	x	Sed. Basins	
<b>761.75 (b) (4) Flood Protection</b>															
if below 100-year flood plain,											NA	above 100 yr			
diversion dikes with a minimum height 2 feet above 100-year flood water elevation around site perimeter											NA				
if above 100-year flood plain,											x		x		
diversion structures capable of diverting all surface water runoff from a 24-hour, 25-year storm											x		x		
<b>761.75 (b) (5) Topography</b>															
low to moderate relief and											?		?	depends on FS Assump's	
to minimize erosion											x		x		
prevent landslides or slumping												[modelling]			

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												averages out weak layer]			
			seismic stability								none	not site specific	yes	clinton Pwr Plant	
			pdc								none	acceptability	none		
			shaw								none	acceptability	none		
			EPA									on site obs.	yes	USGS work	
761.75(b)(6) Monitoring Systems (Pre-operation Ground and Surface Water Sampling)															
761.75 (b) (6) (i) Water sampling															
			(A) sample prior to commencing operation								x		x		
761.75 (b) (6) (i) Surface water sampling															
			B) any surface water course designated by the EPA								NA	Salt Ck.?	NA	Silt control	
			to be sample at least monthly when landfill is used for disposal operations								NA		NA		
761.75 (b) (6) (i) Surface water sampling															
			(C) surface water course, if designated by the EPA								NA	no designation	NA		
			to be sampled at least every six months after final closure for a time period specified by the EPA												
761.75 (b) (6) (ii) Groundwater Monitoring We(Siting Requirements)															
			(A) at least three wells are required that are equally spaced along a line through center of disposal area								x	GIA	ok		
			must extend from highest to lowest water table elevation								no	Mohammet! not Radnor	no		
761.75 (b) (6) (ii) Groundwater Wells (Design Requirements)															
			(B) cased & completed								x		x		
			protected from surface water, removable cap								x		x		
			annular space between the monitor zone and the surface backfilled with Portland cement or equivalent								x		x		
			initial volume of water purged before sampling								x		x		
(Use, Purge Water Treatment/Disposal Requirements)															
			purge operations prior to sampling								?	not noted	?		
			recycle water to landfill or								probably	not specified	unk.		
			treat to applicable State or Federal discharge standards								?				
761.75 (b) (6) (iii) Water Analysis															
			analyze for								x		x		
			A) PCBs								x		x		
			B) pH,								x		x		
			C) specific conductance								x		x		
			D) chlorinated organics								x		x		
Monitoring Well Sampling Frequency															
			"As Specified" in Permit								x		x		
			operation indicator								x	quarterly	x	not specified	
			organic (TSCA Halogenated Organics, 51 RCRA Schedule etc.)								?	annual	accept	not specified	
			PCB								x	quarterly	x	not specified	
			post op continue 30 years								NA	perpetuity	x	not specified	
			monitoring reduction [ Clinton LF may apply for reduction if at closure plus...]									IEPA approved	x	low PCB GW risk	

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5 years (test)																			
when "all potential sources of discharge" cease threat to GW &											NA	dry cell	x	IEPA approved					
monitor wells within attenuation area return to concentration																			
of less or equal to 10% of MAPC for all mon. constituents											NA	[MAPC=Maximum	x	PCB Ndetects					
monitor wells within attenuation area less or equal to											NA	allowable predicted	x	at 0.5 ug/l (ppb)					
MAPC for 8 consecutive quarters												concentration]	x	unrestricted dischg.					
15 year (test)																			
[even if there are potential sources of discharge]											NA	wet cell	x	IEPA approved					
monitor wells within attenuation area return to concentration																			
of less or equal to 10% of MAPC for all mon. constituents											NA	[MAPC=	x	PCB Non detects					
monitor wells within attenuation area less or equal to												TSCA 761.79 rule]		at 0.5 ug/l (ppb)					
MAPC for 8 consecutive quarters														unrestrict. Dischg.					
predicated on											NA		x	no leak scenario					
and GIA																			
<b>Leachate Collection</b>																			
761.75 (b) (7)																			
install above landfill unit liner and secondary liner											x		x						
monitor monthly for											x		x						
quantity											x	report volumes?	not notec	monthly volumes needed					
physicochemical characteristics											x		x						
treat for discharge or dispose in accordance with State or Federal permits or regulations											x	methane	OK,						
(Landfill owner/operator notifies POTW that will be accepting PCB material)											no	no pre-tmt approval	no	need approval					
Analyze water as provided in (b)(6)(iii)											x		not notec	what sumps connect?					
<b>Leachate collection Systems</b>																			
761.75 (b) (7) (i-iii)																			
i) simple leachate collection system or a											NA	porous unsat.	NA						
ii) suction lysimeter											NA		NA						
iii) compound for wet waste placed in "relatively permeable" soil											x	impermeable soil	x	exceeds expect.					
<b>Chemical Waste Landfill Operations</b>																			
761.75 (b) (8) (i)																			
placement to prevent damage											x		x	CQA approved					
placement to prevent incompatibility											?	C&D, gas plant waste?		C&D?					
segregate organic solvent bearing wastes											x	H2S, Methane		C&D?					
761.75 (b) (8) (ii)																			
operational plan to be developed																			
approved											x	IEPA MSW							
recordkeeping details											x		x						
surface water handling procedures											x		x						
excavation & backfilling											x		x						
waste segregation burial coordinates											x		x						
vehicle & equipment movement											x		x						

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use of roadways											X		X	
leachate collection systems											X		X	
sampling and monitoring procedures											X		X	
monitoring wells											X		X	
environmental emergency contingency plans											X		X	
security measures											X		X	
access											X		X	
vandalism											X		X	
unauthorized placement											X		X	
Thermal processing and Land Disposal of Solid Waste 39 FR 293737 Aug. 14, 1974											NA		NA	
liquid waste disposal plans for material 50-500 ppm											X		X	
liquids must not exceed 500 ppm											X		X	
migration prevention											X		X	
bulk liquids not exceeding 500 ppm											X		X	
pretreatment/stabilized											X		X	
chemically fixed											X		X	
evaporated											NA		NA	
mixed with dry inert absorbant											X		X	
non-flowing consistency											X		X	
no free liquids											X		X	
drummed liquid PCBs											NA		NA	
50-500 ppm											NA		NA	
overpacked with sufficient absorbant for contents											NA		NA	
761.75 (b) (8) (iii)														
Ignitable Waste can not be disposed of in chemical waste landfills											?	H2S, CH4	?	
liquid waste is ignitable and prohibited...if:														
flash point less than 60Centigrade (140F.)														
pensky-martens tester														
ASTM D 93-90														
761.75 (b) (8) (iv)														
Recordkeeping & maintenance as in 761.180											X		X	
Supporting Facilities														
761.75 (b) (9)														
i) 6 foot woven mesh fence, wall or other device to prevent entry by unauthorized persons or animals											X		X	
ii) adequate roads to support operations											X		X	
prevention of safety problems or hazardous conditions											X		X	
iii) site operations to prevent safety problems											X		X	
hazardous conditions											X		X	
spilled liquids											X		X	
windblown material											X		X	
(c.) Approval of Chemical Waste Landfills														
761.75(c.)														
(1) Initial Report											X		X	
location											X		X	

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All issues have been resolved...smj, 2010											x		x			
description of landfill											x		x			
site design drawings											x		x			
engineering report											x		x			
demonstrate compliance											yes	IEPA Title 35				
with items in 761.75(b)											no		no	Mohammet,	stability, waivers	
sampling and monitoring equipment											x		x			
facilities for sampling and monitoring											x		x			
expected waste volumes of PCBs											x		x			
description of other co-mingled waste												C & D waste?		gas plant waste		
landfill operations plan											x		x			
local state or federal permits												POTW pmt, IEPA				
schedule & plans for "compliance with approval requirements											yes	coord. With IEPA	x	coord. w/IEPA		
of these regulations"																
(2) other information deemed needed by Regional Administrator											no	to be delivered				
(3) contents of approval																
i) meets all requirements of section (b)											no	mohammet, stab., waivers				
ii) meets all other requirements specified by EPA or through other regulations											x	TBD		TBD		
Other Chemical Waste Landfill Requirements											x	meth/Oxy/	check			
fixed period of time for approval												not specified				
report any PCB detects to RA												30 day on air	x	slow		
(Air Monitoring) 0.3 micrograms/cubic meter 30 day reporting level TO-4 methodology 4 stations											x	exceeds TSCA	no	1.0 microgram/cu meter	shutdown	
background											x	TBD	x			
initial, during operations 1st year											x	TBC	x			
periodic, if initial shows protectiveness											x	TBD	x			
(Daily/Interim Cover)											x	not specified	x	see application terms		
(PCB waste cannot be used as daily cover)											x		x			
(Final Cover)											x	IEPA approved	no	MSW Waste?		
(material must be dry enough to support cap (10 psi)											NA		x	Slope, perm. HELP		
(Post-Closure Care)																
Perpetuity											x		x	Funding, risk		
Financial Assurance												promised for 30 yr	no	not completed		
Required B Letter of Credit, Insurance Policy, Corporate Guarantee												not in App.		TBC 90 days after		
(4) Waivers																
submit evidence that landfill op's present no unreasonable risk in spite of not meeting all requirements											x	GIA	x	EPA model		
RA finds that one or more requirements are not necessary to protect against such risk											maybe	Monitor Mohammet		Aq. Of Concern		
											x	liners	x	exceeds		
												C&D				
												MSW				
findings to that effect must be stated in writing and included in approval																
Requires U.S. EPA review and approval											no?	waiver not requested		Ignore?		
Health and Safety Plan											x		x	present		
(5) persons approved																
approval will designate persons who own and												Clinton Landfill Inc.				
operate chemical waste landfill,												Clinton Landfill Inc.				
exclusively												to be mentioned				
(6) Final approval																

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Signed by Regional Administrator												To be Determined			
states all requirements applicable to approved landfill											no	TBD	no	TBD	
(7) Transfer of property															
ownership transfer notice at least 30 days beforehand												TBD			
transferor submit to EPA 30 days before transfer an agreement to abide by CWM approval												TBD			
EPA issues amended approval												TBD			
amended approval with new name											NA				
new application											NA				
<b>761.79 Decontamination Standards and procedures</b>															
761.79	(a)	applicability									x		x		
761.79	(b)(1)	water									x		x		
761.79	(b)(1)(i)	for closed systems									Not App.		NA		
761.79	(b)(1)(ii) and (iii)	for all water discharged to open systems									NA	POTW or recycle	?	no discharge	
Decontamination standard for water containing PCBs:													NA	no contact	
If less than 3 ppb or a PCB discharge limit included in a permit issued under section 307(b) or 402 of the															
Clean Water Act, discharge to a treatment works or to											no	POTW	no	No pre tmt approval	
navigable waters											NA		NA		
If less than 0.5 ppb, discharge without restrictions											x	GIA	x	EPA model	
(pre-treatment program permit process)															
Pre-operation Leachate testing											x	POTW PMT			
Test prior to PCB disposal to ensure no PCB in leachate											x	Needs POTW			
761.79	(b)(2)	for organic non-aqueous liquids									NA				
761.79	(b)(3)	non porous surfaces									NA				
761.79	(b)(4)	concrete									NA				
761.79	(c.)	self implementing decontamination											TBD...		
761.79	(d)	decontamination solvents									NA				
761.79	(e)	limitation of exposure and control of releases											TBD...		
761.79	(f)	sampling and recordkeeping for decontamination											TBD...		
761.79	(g)	decontamination waste and residues											TBD...		
dispose at existing PCB concentration													TBD...		
761.79	(h)	Alternative decontamination or sampling approval											TBD...		
"761.80" Manufacturing, processing and distribution in commerce exemptions											NA				
<b>Subpart F Transboundary Shipments of PCBs for Disposal</b>											NA				
<b>Subpart G PCB Spill Cleanup Policy</b>											x	PCB limit?			
761.120*	Scope														
761.123*	Definitions														
761.125*	Requirements for PCB spill cleanup										x		x		
761.130*	Sampling requirements										x		x		
761.135*	Effect of compliance with this policy and enforcement										NA		Na		
<b>Subparts H-I Reserved</b>											NA				

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<b>Subpart J General Records and Reports (Disposers and commercial storers of PCB waste)</b>												
<b>"761.180 Records and monitoring</b>												
761.180" (a) PCBs and PCB Items in service or projected for disposal							NA					
761.180" (b) Disposers and Commercial storers of PCB waste							x		x			
"761.180 (b)(1) Annual Records							x		x			
761.180" (c.) Incineration facilities							NA		NA			
761.180" (d) Chemical Waste Landfill Facilities							x		x			
data retention required for 20 year(s) after landfill is no longer used for disposal of PCB material							x		x			
including:												
all water analysis							x		x			
operations records and burial coordinates							x		x			
761.180" (e) High efficiency boiler facilities							NA		NA			
761.180" (f) Retention of special records by storage and disposal facilities							NA		NA			
761.180" (g) Reclassification records							NA		NA			
<b>761.19 Certification program and retention of records by importers and persons generating PCBs</b>							NA		NA			
<b>761.19 Maintenance of monitoring records...from distribution of inadvertently generated PCBs</b>							NA		NA			
<b>Subpart K PCB Waste Disposal Records and Reports</b>												
(Waste Generators and Disposers)												
<b>761.2 EPA identification numbers</b>									no			
a) General							no	number missing	no			
b) Prohibitions												
1) may not								x				
i) "operate" an EPA identification number or designation								x				
ii) transfer or release waste to anyone without such number or design.								x				
2) transporters may not								x				
i) transport without an EPA ID								x				
ii) Deliver PCB waste to anyone without an EPA ID								x				
3) storers may not accept PCB waste without								x				
4) disposers may not accept PCB waste without...								x				
c) For early handlers of PCB waste (pre Feb. 5, 1990)							NA					
d) For late handlers of PCB waste (Feb. 5, 1990 and after)								subject to prohibition				
<b>761.21 Notification of PCB waste activity (EPA form 7710-53)</b>												
a) 1) early waste handlers file form by certain date							NA					
2) late prospective users, post Feb. 5, 1990 must notify via form before handling								x				





