



MEMORANDUM

TO: Patrick Urich
DATE: December 8, 2009

FROM: Patrick G. Sloan, P.E.
NUMBER: 9P001.00

SUBJECT: Special Waste Procedures

This memo and the attachments are provided in response to your request for assistance in answering the request from Peoria Families Against Toxic Waste, November 23, 2009. The County was answering question 1. This memo addresses questions 2 and 3:

2. *Please provide the criteria, procedures & process (including public review & comment) that the Joint Landfill Committee requires Foth consultants to use when Foth or the Landfill Contractor has a request to accept waste that is considered Special Waste, i.e. – How does Foth determine what request to landfill special waste must have Committee consideration and approval as opposed to Foth recommending administrative approval?*

The site specific requirements are attached and consist of the following:

- Procedures for General Refuse and Special Waste Received at the City of Peoria/County of Peoria Landfill, Revised October 2008;
- Waste Solidification Processing Plan and Special Waste Plan, November 2004; and
- Current Landfill No. 2 Permit, Modification 75, July 14, 2009.

The general chronology of how special waste is considered is as follows:

- a. A business or industry approaches the Contractor to seek disposal of a wastestream;
- b. The Contractor works with the Generator to prepare the required waste profile information, obtain waste characterization data, as required, and perform the required certifications, if appropriate;
- c. After the Contractor verifies their determination of completeness and acceptability, they send it to Foth;
- d. Foth conducts a review of the application and asks for additional information or clarification, as appropriate;
- e. After Foth has received all the requested information, if it is determined that the waste meets the requirements of the waste procedures and if it is a pre-approved the waste stream, the Contractor is notified that acceptance is approved. The Committee is notified at the next meeting.
- f. If all the information is received, if it is determined that the waste meets the requirements of the waste procedures and it is determined that the waste stream

is not pre-approved, the information is presented at the next Committee meeting for consideration and approval, if they so decide.

- g. On occasion, the Contractor requests an administrative approval, usually due to the generator's request to dispose of the waste between meetings. This is to be the exception rather than the rule and the generators and Contractors are reminded often to plan ahead so this does not happen. When it does, the City Public Works Director makes the administrative approval decision. If Mr. Barber is unavailable and it is an emergency, approval is sought from Chairman Bergstrom.

Foth provides a review memo, waste profiles and certifications for the Committee, which is available in the packet to the public. Many profiles contain laboratory reports, MSDS data, backup information and correspondence between Foth, the Contractor and/or the generator. For simplicity, we do not provide all the background information, due to the technical content and the magnitude of the data.

Every special waste stream that is received at the facility is identified in the monthly report provided by the Contractor. Foth reviews this list on a regular basis and maintains a list of waste streams that are approaching renewal dates or require additional data to complete their acceptability status. These reviews represent another line of correspondence between Foth and the Contractor. The committee is provided updates on these activities from time to time.

As far as deciding on what waste streams are pre-approved – that is a decision of the Committee as they have directed in Section 6.01 of the waste procedures, which are attached. Foth simply applies these criteria.

3. *Are the criteria and procedures the same as in #2 above for any request to accept special- delisted waste, eg, delisted EAF? If not, please provide the process and procedures (including public review & comment) to be used for special- delisted waste.*

Yes. The Peoria City-County Landfill is permitted to receive only non-hazardous wastes. The definition of hazardous waste is contained within the Resource Conservation and Recovery Act (RCRA). If a generator is able to obtain approval by IEPA or USEPA to remove a waste stream from a RCRA list, it could become non-hazardous. Whenever a waste stream is submitted for review, Foth verifies that it is not on any of the RCRA lists, by reviewing the name and source of the waste stream, the characteristics of the waste (analytical data) and any specific waste stream determinations, which could include an Agency delisting process.