



memo

TO: PEORIA COUNTY RESOURCE MANAGEMENT PLAN ADVISORY COMMITTEE

FROM: DAVID STEAD

CC: KAREN RAITHEL

DATE: 2/16/2015

RE: REVISION TO THE DRAFT RESOURCE MANAGEMENT PLAN DATED 6/16/2014

The following revisions were mad to the Draft Resource Management Plan dated June 16, 2014 based on public comments received on the draft and on the Advisory Committee comments and discussion of the public comments.

1. The term “Citizen Convenience Center Drop-off” was revised to Regional Citizen Convenience Center” throughout the document.
2. Changed Food Waste to Food Scrap throughout document
3. Page 5, Diversion rate goal was revised to:

A model was developed to estimate the future diversion rate given the program goals and objectives outlined in the Plan. The diversion rates were estimated for a 5-Year and a 10-Year period. [The diversion rates were developed for a 5-Year and a 10-Year period. The Plan sets a five-year residential waste diversion goal of 20% and an overall diversion goal \(including the entire commercial sector\) of 50%. Set a ten-year residential waste diversion goal of 30% and an overall diversion goal \(including the entire commercial sector\) of 60%. The Plan establishes a five-year household participation rate for curbside residential recycling of 50% of households, including single family and multifamily households. Set a ten-year household participation rate for curbside residential recycling of 90% of households, including single family and multifamily households.](#)

4. Page 6, Resource Management Plan, 7th Bullet the term “relocate” was removed and the bullet was revised to:

Develop a new comprehensive Citizen Convenience Center for Drop-Off of recyclables, refuse, bulky items, organics, and any other materials.

5. Page 10, a new section on “Education” was added following the Commercial Recycling Ordinance section.

[Education](#)

[Education and awareness of the importance of recycling for all residents is a key component of meeting recovery goals. The continued development of education/outreach initiatives for waste reduction, reuse and recycling as the primary strategy to encourage further landfill](#)

[diversion, waste reduction activities, and use of the recycling systems should be based on systems already in place, including school based curriculums. Multi-family educational opportunities, in cooperation with multi-family management companies, and outreach information in-person using print materials and online tools is a key to increasing and maintaining participation in diversion programs for this sector of residents. Education services are identified in all components of the Resource Management Plan.](#)

6. Page 11, Highlighted Initiatives for Recycling, #5 was revised to:

Identify and consider funding of appropriate property, plant, and equipment improvements to the [rural Drop-off Stations and the Regional Citizens Convenience Center](#) to allow more materials to be collected.

7. Page 12, Highlighted Initiatives for Refuse Services, #1 was revised to:

Increase emphasis on regional partnerships for continued provision of drop-off opportunities for small quantities of refuse from residential and commercial sources at the [Regional Citizens Convenience Center](#), as identified in the landfill contract with PDC, [to allow more materials to be collected-](#)

8. Page 22, Recycling-4: Citizen Convenience Center Drop-Off Recycling Collection, Key Objective #3 was revised to:

Establish service expectations with individual local units and in communities surrounding Peoria County that expect their citizens to use these facilities. Finalize the funding and cost sharing partnerships [to fully fund the rural Drop-off Stations and the Regional Citizens Convenience Center](#) by 2020. [Provide adequate enforcement of anti-dumping regulations and maintain signage and educational information at rural drop-off locations to prevent dumping of waste and non-recoverable materials at the rural unstaffed drop-off locations.](#)

9. Page 23, Recycling-5: Recyclable Materials Processing and Marketing, Key Objectives, a new statement #5 was inserted and states:

[5. Audit End Market Contracts and support local markets for end products to the greatest extent possible](#)

10. Page 32, Refuse-3: Drop-Off Refuse Collection, Key Objective #1 was revised to:

Use Regional Partnership approach to establish service expectations and funding systems with the County and/or individual local units surrounding Peoria County that expects their citizens to use these facilities [and maintain access to drop-off by providing services to all residents within 5 miles of their residence.](#)

11. Page 34, Landfill Site-1: Site Expansion Licensing and Disposal Capacity, Goal Statement, was revised to:

Goal Statement: The City and the County will manage the land resources that make up the landfill site in order to best maximize opportunities for resource recovery and reuse, required support facilities and programs, open space conservation, wildlife habitat, and

ecological development. [Peoria City/County Landfill Committee should continue to evaluate the disposal of special wastes, including Coal Combustion Residue \(coal ash\), to ensure the disposal of these materials in the most environmentally acceptable manner.](#)

12. Page 44, a new 5 year goal under Organics was added that states:

[Organics-2: Vegetative Food Scrap Waste Collection -](#)

[Selected commercial and institutional generators of large quantities of food scrap will have the opportunity to participate in a pilot program for the collection and composting of vegetative waste with long-term implementation, if feasible.](#)

- [1. Evaluate and pilot full scale food scrap composting for single family locations first, and later determine how to collect from businesses and multi-family dwellings.](#)
- [1-2. Pilot, in collaboration with the commercial/institutional vegetative food scrap-composting project.](#)

13. The Peoria County 5 year Timeline was revise by starting the timeline in Q3/Q4 2015. The Commercial Recycling Single Stream Program modification was revised for planning to begin in Q3/Q4 2016 and implementation to begin in 2017. A new Commercial Food Scrap Collection Pilot was added with Planning being initiated in Q3/Q4 2016 and implementation to begin in 2018.

14. Page 51, the Hanna City drop-off was removed from the list.

15. Page 56, following the section on Wastewater Treatment Facilities a new section was added for Coal Combustion Residuals (Coal Ash) and states:

[Coal Combustion Residuals Generated by Electric Utilities](#)

[The composition of coal ash may vary depending on the source of the coal, the processing of the coal, the burning of the coal and the method of the collection of the ash. The coal ash collected as bottom ash \(clinker, boiler slag, etc.\) is different from the coal ash collected as fly ash from the smoke stack and the air pollution controls. Groundwater contaminants found in the monitoring wells installed adjacent to surface impoundments in Illinois show non-hazardous contaminants such as boron, total dissolved solids, and sulfates. Cadmium, a hazardous contaminant, has been detected in only one surface impoundment.](#)

[The U.S. Environmental Protection Agency proposed coal ash regulations in 2010. On December 19, 2014, the EPA Administrator signed a final rule that establishes a comprehensive set of requirements for the disposal of coal combustion residuals \(CCRs or coal ash\) in landfills and surface impoundments. These requirements have been finalized under the solid waste provisions, subtitle D, of the Resource Conservation and Recovery Act. These regulations protect our water, our air, and our communities and contain provisions to help ensure that actions taken by power plants to comply with this rule are transparent and that the communities impacted by the disposal of CCRs have the information they need. The rule establishes requirements for both existing and new CCR landfills and surface impoundments, including lateral expansions of any existing unit. These include:](#)

- [1. Structural Integrity Requirements \(requirements starting 6 months to 2 years after rule publication\)](#)
- [2. Groundwater Monitoring and Corrective Action \(requirements starting 30 months after rule publication\)](#)

3. [Location Restrictions \(requirements starting 18 months after rule publication\)](#)
4. [Liner Design Criteria \(documentation required 18 months after rule publication\)](#)
5. [Operating Criteria \(requirements starting 6 months after rule publication\)](#)
6. [Record Keeping, Notification, and Internet Posting \(requirements 6 months after rule publication\)](#)
7. [Inactive Units that have ceased receiving waste by the effective date of the rule.](#)
8. [Closure and Post Closure \(requirements 18 months after rule publication\)](#)

State Programs

[The regulations being finalized today are minimum federal criteria with which facilities must comply without the engagement of another state or federal regulatory authority. States are not required to adopt these regulations, to develop a permitting program, or to submit a program to EPA for approval. There is no mechanism for a state program to operate “in lieu of” the federal regulations. EPA is strongly encouraging states to adopt at least the federal minimum criteria into their regulations. EPA recognizes that some states have already adopted requirements that go beyond the minimum federal requirements \(e.g., financial assurance\). This rule will not affect these state requirements; moreover, the final rule does not preclude a state from adopting more stringent requirements where they deem that appropriate.](#)

[Each Illinois EPA Bureau has a set of regulations covering coal ash:](#)

[**Bureau of Air:** Some coal ash is captured through air emissions equipment. As technology improves, air pollution laws continue to become stricter in limiting what can be released into the air.](#)

[**Bureau of Water:** State construction and operating permits issued in conjunction with National Pollution Discharge Elimination System permits require surface impoundments to be in compliance with the Illinois groundwater and surface water quality standards including non-degradation requirements. Permit conditions require low permeable liners and groundwater monitoring. Older impoundments over important aquifers were required to install a groundwater monitoring system and to submit compliance reports to the Illinois EPA.](#)

[**Bureau of Land:** Coal combustion residue can be disposed in special waste landfills with a proper permit. Again, permit conditions require low permeable liners and groundwater monitoring. Older impoundments over important aquifers were required to install a groundwater monitoring system and to submit compliance reports to the Illinois EPA.](#)

Beneficial Use

[The final rule does not regulate CCRs that are beneficially used, and provides a definition of beneficial use to distinguish between beneficial use and disposal. This rule does not affect beneficial use applications started before the effective date of the rule. Only applications to be started after the effective date of the rule need to determine if they comply with the criteria contained in the final rule distinguishing between beneficial use and disposal. Additionally, the rule establishes a comprehensive definition of beneficial use of CCRs to remove confusion about what constitutes beneficial use. The rule also clarifies that a use of a CCR that is not beneficial use is disposal.](#)