

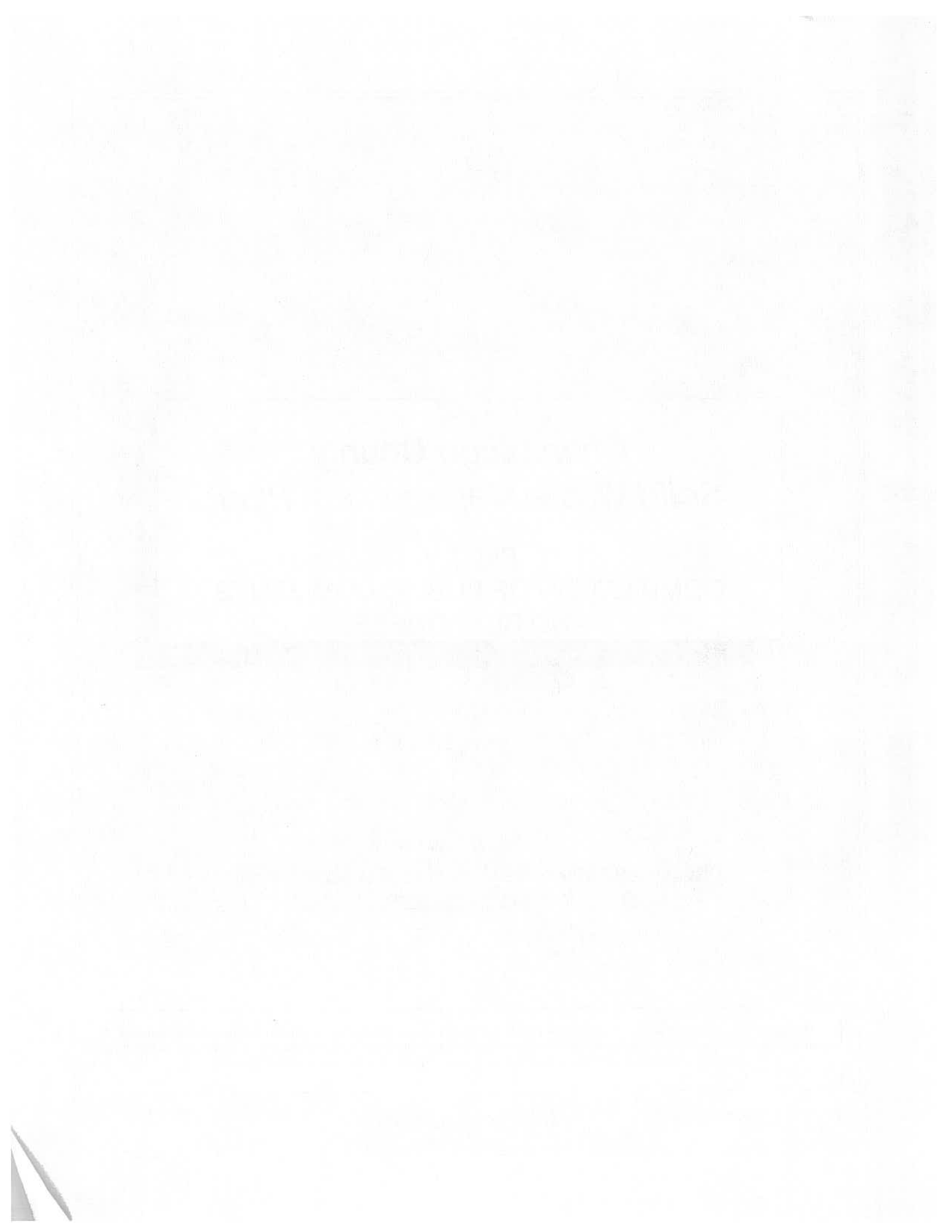
***Champaign County  
Solid Waste Management Plan***

**PART V  
COMPILATION OF PUBLIC COMMENTS  
AND RESPONSES**

**Prepared by the  
Intergovernmental Solid Waste Disposal Association  
209 W Clark St, Champaign, IL 61820**

This Document was prepared, in part, with funds from Solid Waste Planning Grant (P) 3-52 from the Illinois Environmental Protection Agency in accordance with Section 8 of the Illinois Solid Waste Management Act, PA 84-1319. It is intended, in part, to fulfill the requirements of Section 4 of the Solid Waste Planning and Recycling Act, PA 85-1198.

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## FOREWORD

This is a summary of the comments received regarding the Champaign County Solid Waste Management Plan as developed by the Intergovernmental Solid Waste Disposal Association (ISWDA). These comments were received during the public comment period established by the ISWDA Board extending from October 13, 1990 through January 14, 1991. The Illinois Solid Waste Planning and Recycling Act (PA 85-1198) requires a 90-day review and comment period before final acceptance of the county-wide solid waste plan. The Act also requires that at least one public hearing on the proposed plan be held during this period. The public hearing was held on December 5, 1990. In addition, the plan that is subsequently submitted to the county for adoption must be accompanied by a document containing written responses to the substantive comments made during the public comment period. This responsive summary is intended to represent substantial compliance with the Solid Waste Planning and Recycling Act.

The Intergovernmental Solid Waste Disposal Association was formed in July 1986. Upon its formation, one of the first actions of the ISWDA was to apply to the State of Illinois for a solid waste planning grant as provided by the Illinois Solid Waste Management Act (PA 84-1319). In March of 1987, the ISWDA was awarded a solid waste planning grant of \$154,000.00. The principal use of the grant funds was to retain consultants to assist the ISWDA in preparing a needs assessment and a solid waste management plan. Consulting firms were procured with expertise in the areas of recycling; composting; waste-to-energy; landfilling; and financing. These grant funds were provided under the authority of the Illinois Solid Waste Management Act of 1986 (PA 84-1319).

The Solid Waste Planning and Recycling Act was signed into law in August 1988 and became effective January 1, 1989. This new law required all Illinois counties with a population of over 100,000 to prepare solid waste management plans by March 1991. Pursuant to this Act, the ISWDA requested the County Board to delegate planning responsibility to the ISWDA. The Champaign County Board passed a resolution (2843)

on April 18, 1989 officially delegating its solid waste planning authority to the ISWDA and authorizing the formation of and selection of members to the Board Advisory Committee for Solid Waste Planning (as required by the Act).

By October 1990, a draft of the Champaign County Solid Waste Management Plan had been prepared and released to the public.

The Champaign County Solid Waste Management Plan complies with all Illinois state laws, in particular with the Local Solid Waste Disposal Act, the Illinois Solid Waste Management Act, and the Solid Waste Planning and Recycling Act. The Plan presented for public comment and review consisted of four parts:

- Part I - Solid Waste Characteristics
- Part II - Source Reduction
- Part III - Recycling
- Part IV - Facilities, Siting Criteria, and System Costs

Written and verbal public comment was received during the 90-day public comment period regarding these three volumes. The following activities were conducted during the 90-day period:

- The four parts of the Plan were distributed to all municipalities within the County, to the County Board, the Champaign County Health Department and to the Illinois Environmental Protection Agency;
- The four parts of the Plan were also distributed to six libraries in Champaign County.
- The Plan was distributed to all persons, institutions or companies requesting copies of the Plan at a charge to cover our copying costs.
- Notification of the 90-day review period was handled through the ISWDA's regular mailing lists, all county municipalities, and print media. The purpose of this distribution was to encourage attendance at public meetings concerning the Plan



- and to encourage the submission of comments concerning the Plan;
- On December 4, 1990, a Press Briefing was held for the area media. This session designed to specifically educate the press on the various elements of the Plan. Newspaper, radio and television representatives attended;
  - One county-wide public hearing was held at the City of Champaign Council Chambers on December 5, 1990. An Executive Summary of the Plan was distributed to all who attended and later sent to the same people who received the Plan. Notice of this hearing was widely publicized in the local media through paid advertising and news stories.
  - There has been widespread press coverage of the ISWDA and its activities throughout its three year existence, including extensive coverage during the 90-day review and comment period.

The Illinois Environmental Protection Agency has given generally favorable reviews of the Plan. There were only five comments submitted by Illinois EPA.

This document includes a summary of substantive public comments submitted during the public comment period. They are, when appropriate, grouped into categories. A written response has been prepared for these comments. Copies of all written public comments submitted during the public comment period are also attached.

The development and implementation of a solid waste management plan for Champaign County must be viewed as a dynamic rather than a static process. Flexibility is built into this Plan document in order to accommodate changing regulations, legislative uncertainties, siting considerations, and the economic impact that future decisions may have on the overall disposal system. The receipt of the public comments concerning the Plan document must also be viewed as a dynamic process. Although state law requires only a 90-day review period, the ISWDA, (the Implementing Agency recommended in the Plan), should remain open to the receipt of additional public comments and suggestions concerning the Plan and its recommendations. Therefore, any interested person who

reviews this volume, the Plan, and/or related documents at any time is encouraged to submit their comments to:

Intergovernmental Solid Waste Disposal Association  
209 West Clark Street  
Champaign, IL 61820

It is intended that this document become the fifth part of the Champaign County Solid Waste Management Plan (Part V: Compilation of Public Comments and Responses).

## Solid Waste Characteristics

"What is the amount and types of waste generated by commercial sources in Champaign County based upon national studies or state data? Will the ISWDA staff estimate this volume by different commercial sources and size of business?"

Mr. John Thompson, Citizens for Waste Solution

*The basis of the projected solid waste tonnages by sector was originally prepared by Brown, Vence and Associates. A subcontractor to this firm, Franklin and Associates, prepared the generation estimates for Champaign County. Franklin and Associates has also prepared the national generation and distribution estimates for the United States Environmental Protection Agency. The Franklin and Associates derived Champaign County wastestream estimates from both national and state sources.*

*The ISWDA has provided some estimate of distribution of business activity by employee size and business type in Part III of the draft Champaign County Solid Waste Management Plan (Pages 108-119). No additional distribution of volume and material composition will be prepared as part of the Champaign County Solid Waste Plan process. However, the Community Recycling Center may have specific information about wastestream composition since it is a provider of recycling services to small to medium size businesses in their high volume commercial program. This was the source of some of the commercial sector recycling data.*

"'Other Papers' represents the single largest material in the residential/commercial category. It is also the least recycled wastestream, but has the most potential for future recycling. Will the ISWDA staff identify the types of paper represented by 'Other Papers?' Will the ISWDA staff estimate the quantity of each paper type represented in 'Other Papers?'"

Mr. John Thompson, Citizens for Waste Solutions

*The category, "mixed paper," includes magazines, color paper and other types of paper which are not recyclable (paper with plastic coatings, glued paper, etc.) As the question suggests, it is the least recycled paper in the wastestream, due to markets. No additional distribution of volume and material composition will be prepared as part of the Champaign County Solid Waste Management Plan. However, markets may improve in the future with changing recycling and processing technology. If that occurs, it may be possible to determine recovery rates. A large portion of the mixed paper is residential in origin. In documents submitted in April of 1990 by the Community Recycling Center, they estimated that approximately 4,000 tons per year of mixed paper could be recovered. This represents approximately 20% of the 1988 base year estimate. This collection was from a combination of countywide curbside, drop-offs and other collection programs. An additional 3,000 tons could be recovered from mixed waste if overall markets existed for mixed paper.*

## Source Reduction

"Please add suggestions on ways of reducing the per capital generation of waste. There is presently virtually no suggested regulatory measures proposed to do this."

Mr. Andy Cohen

"So source reduction is something that needs to be, have a lot more attention paid to it."

Mr. Malcom Sickels

"Why can't the ISWDA investigate the source separation incentives and explain what effect their implementation in this county would have?"

Mr. Bruce Hannon

"First, given the lack of incentives, the failure to place responsibility on the waste generators, the people of this community, how will you increase source separation and waste reduction with education in our community?"

Mr. Tom Sheehan

"..emphasis definitely needs not to be on a multi-million dollar MRF, but needs to be on source separation and increasing that..."

Ms. Abbie Illinberger

"..I don't see a single meaningful proposal for source reduction in the plan."

Mr. Ethan Castleton

"..source reduction section...is weak..."

Mr. Mark Loughmiller

"The Plan should include a full discussion of possible waste reduction regulations and incentives, and should recommend adoption over the next several years of those measures that seem most workable."

Prairie Group of the Sierra Club

*Suggestions on reducing per capita generation of waste are included in Part II of the Solid Waste Management Plan. Regulatory measures are not the only means to reduce waste generation. This issue was discussed by the Board Advisory Committee and the concern was that regulatory measures to reduce waste generation are difficult to develop, implement and enforce. Unclear, poorly implemented or poorly enforced regulations are not beneficial to the advancement of source reduction. Until more research and studies can be completed that review (and quantify) these types of regulations, they appear to be inappropriate. Incentives for source reduction, such a volume-based pricing, also encourage recycling. These measures are addressed in Part III, Recycling, p. 136.*

*Source Reduction programs are the newest management technique in solid waste management. It is anticipated that the 1990's will see the maturing of this management option. As successful programs are identified, they can be incorporated into the solid waste management system in Champaign County at any time and especially at the formal review periods.*

"...we should pass ordinances now rather than waiting 5 years for the State or the Feds to do something."

Ms. Eva Kingston

*See recommendation #1, Part II, p. 22.*

### **Education**

"Seattle spends \$1 - \$2 per person every year on education activities. What level of funding will the ISWDA staff recommend for ISWDA-sponsored education efforts?"

Mr. John Thompson, Citizens for Waste Solutions

*See Part II, Appendix 3. Currently, it is estimated that member governments of the ISWDA (including payments to Community Recycling Center for education and promotion) and the ISWDA itself spend approximately \$82,000 in 1990 on education activities. This represents approximately 11% for all public funds spend on recycling. On a per capita basis this is about \$.52 per person. The City of Seattle devotes approximately 10% of its recycling funds towards education activities.*

*The draft Champaign County Solid Waste Management Plan suggests that the first priority for education programs is to better direct funds already committed. Thus, at a minimum, the current level of expenditures should be maintained. If all the proposed education and waste reduction activities are implemented, per capita spending in Champaign County will fall within the \$1 - \$2 range suggested by the commenter.*

"What steps does the ISWDA plan to take to enhance existing education efforts to reduce waste identified on page 8 and 9 of Part II?"

Mr. John Thompson, Citizens for Waste Solutions

*The draft Champaign County Solid Waste Management Plan is supportive of local, nongovernmental education programs aimed at waste reduction. The ISWDA is interested in reviewing the analysis of such programs and determining the utility and effectiveness as waste reduction techniques. If they are found to be effective, the ISWDA will consider how they might be made more broadly based.*

"To achieve a maximally effective recycling and source separation program, the plan should provide adequate funding to independent agencies that will continue and expand the community's present education programs."

Ms. Deborah Rugg, League of Women Voters of Champaign County

*It is unclear why "maximally effective recycling and source separation programs" can only be reached with independent agencies providing community education programs. Education programs are currently handled by an outside agency, the CRC, as well as the Cities and County. Although education efforts are good, they are disjointed and not comprehensive. Unifying the education positions and funding will allow for the development of a cohesive and coordinated education program. It also does not make sense to allow an outside agency to control education programs when the related source reduction, recycling and household hazardous waste programs are going to be run by a government agency.*

### **Bans, Deposits and Surcharges**

"City or County regulations - similar to the recent state law banning yardwaste ... can be phased in over several years to include newspapers, metals, glass, reusable plastics, and toxic wastes"

Mr. John Dickel

"We already have the mandatory recycling of yardwaste through our yard waste program. Why not eventually ban other potentially recyclable materials?"

Ms. Lee Alekel

"'Disposal ban on "certain common HHW" to prevent mixing in with other garbage.'  
'Deposit on certain dangerous materials that remain in mixed garbage'"

Ms. Kim Majerus

"..tax on objects with excessive packaging."

Mr. Steve Frankel

"..bans on various substances which can be hazardous should be instituted to require alternative distributions to returning for recycling.'  
'..semi-annual intervals..something like that."

Mr. John Dickel

"I...suggest implementation of a bottle bill, packaging tax, or other incentives for manufacturers and citizens to produce less waste..."

Ms. Tania Banak

"The draft plan recommends studying bans, deposits and taxes on waste in five years if the federal or state governments take no action on these items. Why

shouldn't these topics be studied now and a target date for implementation be identified?"

Mr. John Thompson, Citizens for Waste Solutions

"I believe something is missing from the Board's solid waste plan, and that is a beverage container bill..."

Mr. Donald Gillis

*See Part II, Recommendation #1, p. 25.*

*The ban on yardwaste was frequently cited as a model for banning material from landfills in Champaign County. However, as was acknowledged by some, the ban was enacted at the State level. In order to be effective, this plan recognizes that such bans should occur at the State or Federal level. For example, while there was a yardwaste recycling program in Urbana, compliance and participation increased markedly when the State yardwaste ban took effect July 1, 1990. Similarly, used tire management has improved since the State surcharge program took effect. Batteries have also been banned from landfill disposal. Bans that have been enacted at the local level, such as Minneapolis/St. Paul or Suffolk County New York, are currently facing legal challenges or potential legal challenges. Suffolk County has virtually rescinded their ban on plastics due to a court required environmental impact statement. Minneapolis/St. Paul may be facing a court challenge of their ban on polystyrene from fast food restaurants. The restaurants claim the cities are hindering their recycling efforts undertaken to comply with the legislation and therefore the ban is illegal. This type of court challenge or negotiations to avoid a court challenge, will benefit areas such as Champaign County, that are interested in enacting such bans in the future.*

*Local areas with bans are also generally the largest populated city in the State; even Suffolk County, NY has a population over 1 million. Champaign County has 172,000, or 1.5% of the Illinois population. It appears to be prudent to observe the development of bans, deposits and packaging requirements at the State and Federal level as well as the major metropolitan level prior to action at the local level.*

*The State of Wisconsin recently enacted a ban on certain materials. The objective was to move specific materials into a recycling collection and processing system as opposed to a solid waste collection and disposal system. In fact, the Wisconsin legislation specifically exempts communities from material bans if (1) effective recycling programs exist; (2) energy recovery occurs from existing incinerators; and, (3) if used as a supplemental fuel. Effective recycling programs include source separation and/or mixed waste recovery of recyclables.*



*The objective of bans is, in part, to divert recyclable material away from disposal oriented solid waste management systems. There is a significant difference between what is potentially recyclable material as opposed to actually recyclable material. The draft Champaign County Solid Waste Management Plan does expand on such a concept by enhancing collection services and materials collected. If the State of Illinois should adopt legislation similar to that of Wisconsin, the proposed solid waste management system outlined in the draft Champaign County Solid Waste Management Plan will have the flexibility to meet new state mandates.*

"How could deposits on beverage containers or toxic materials be implemented in home-rule governments? County-wide?"

Mr. John Thompson, Citizens for Waste Solutions

*Home rule units are widely empowered by state statute. The Cities of Champaign and Urbana are home rule units. Champaign County is not. The framework whereby disparate local government powers can be effectively used to implement local deposit laws for beverage containers or toxic materials is not known at this time.*

### **"Model Community" Support**

"The Plan should consider ways of stimulating the model community program through either government sponsorship or partial funding out of waste tipping fees."

Prairie Group of the Sierra Club

*The Plan does not acknowledge a potential role for the implementing agency and the Model Community Program; see Part II, recommendation 1, under Education, p. 24.*

### **Expanded Curbside**

"I was disappointed that I didn't see very many actual recommendations for expanding the recycling program."

"Need to maintain strong recycling program...I'd like to see the plan amended to include expanded provisions for recycling."

Ms. Tania Banak

"..main problem I see is that there are not enough concrete proposals and suggestions concerning increased recycling."

Ms. Abbie Illinberger

"..expand the curbside program, ... countywide and we need to pick up more materials."

Ms. Lisa Bell

"..expand our curbside program."

Ms. Susan Taylor

*See Recommendation #1, Part III, p. 139.*

"When will the ISWDA begin to approach non-ISWDA municipalities about curbside recycling programs?"

Mr. John Thompson, Citizens for Waste Solutions

*With the adoption of the Champaign County Solid Waste Management Plan, all the village presidents/mayors will receive the corrected pages of the Solid Waste Management Plan. This will include the recommendation regarding curbside recycling programs in County villages.*

*The form of additional contact will take has not been finalized. The recommendation, in part, recognizes the need for each village to make the decision regarding beginning curbside recycling. This is because it does cost more to recycle at this time. Each village must decide if expenses related to such activities is an expense it is able and willing to accept. Just as it would be unfair to expect these villages to pay higher tip fees which include support for Champaign-Urbana curbside services, it is equally unfair to expect Association members to support recycling programs for non-members.*

"Is it fair that residents in other parts of Champaign County, whose garbage bills are going to rise, are not going to get the simple services of curbside that residents of Champaign and Urbana are going to get?"

Mr. John Thompson

*See the following recommendations: Part III, recommendation #1 under Long-Term Goals, p. 139-140 and Part IV, recommendtion #4, p. 181-182.*

### **Collection of Additional Material**

"Curbside pick-up should be expanded to include paper (not just newspaper), cardboard and plastic containers."

Ms. Eva Kingston

"..why doesn't the plan propose to include PET plastic and polystyrene?"

"What about the myriad other plastics that go to the landfill each week because there is no way to recycle them?"

Ms. Christine Main

"Will the ISWDA staff modify the draft plan to include county-wide curbside and expanded materials including PET, HDPE, mixed paper, motor oil, high-grade paper and cardboard?"

Mr. John Thompson, Citizens for Waste Solutions

*Selection of materials to include in curbside programs is driven by several factors. The first is quantity. Do homeowners generate a large quantity of a particular material and if collected, will it reduce the amount of garbage landfilled? The second issue is, can the material be picked up at the curb. A companion issue is whether existing curbside programs can accommodate the material. A final set of issues revolve around the marketing of the material. Is there a market? What are the associated processing costs? Transportation costs?*

*All of these must be considered prior to adding a material to a curbside program. Just because a material, such as magazines, is being collected through curbside programs elsewhere does not automatically make it something that should be collected in Champaign County. Each community is different, especially in terms of access to markets. Since it would be more damaging to add a material to a curbside program and drop it later, a stable market must be identified before adding a material. The selection of cardboard/paperboard as the additional material for the curbside programs was based on the following: 1) Homeowners generate large quantities of this material, 2) collection can be incorporated into existing programs and 3) there are good markets. Additional materials such as plastic or magazines may be added in the future as the above issues allow.*

*In the case of plastics, the question answers itself in that where there are no markets or weak markets, it is difficult to collect, process and market these types of materials. Plastics, of all types, represents approximately 6% by weight of the residential/commercial wastestream. Currently, the municipal and county residential recycling programs collect HDPE plastics. In addition, some packaging industry activity in the Champaign/Urbana area recycles its plastic scrap. The larger, more readily marketable fraction of the residential/commercial wastestream, paper products and newspapers, is currently being targeted for expanded collection. As additional collection and processing capacity is developed, it will be possible to bring in other plastics as markets develop.*

### **Mandatory Recycling**

"Enforced user recycling is the most straightforward method to do this."

Mr. John Dickel

"..specific regulatory measures, such as mandatory recycling plans to encourage businesses, institutions, and residents to increase recycling and reduce mixed waste."

Ms. Lee Alekel

"..we need...a greatly expanded and enforced recycling program to decrease what winds up in the landfill. Recycling/composting should be mandatory for all residents..."

Ms. Eva Kingston

"The draft plan gives little consideration to mandatory recycling..."

Mr. Glen Stanko

"The Plan should consider, in detail, the various ways of implementing mandatory recycling and developing financial incentives to stimulate increased recycling. The Plan should consider ways to encourage business to recycle more, including mandatory recycling plans. The Plan should also examine specific regulatory measures and financial incentives to alter waste flow so that waste produced in the county is more readily recyclable."

"The Plan should include a full discussion of various penalties and financial incentives to induce full participation in recycling programs."

Prairie Group of the Sierra Club

"Reduced participation in recycling due to 'transfer station.'"

Champaign-Urbana Public Health District

*See Recommendation #5, Part III, p. 138.*

*Mandatory recycling programs are instituted generally to increase participation levels in recycling activities. As stated in the Plan, the national average participation rate for mandatory programs is 65-70%. Champaign's and Urbana's curbside programs had participation rates between 60-65% in the Fall of 1990. If participation rates begin to decline (for any reason), then mandatory recycling should be instituted. Through this recommendation, a new minimum participation level is set each quarter. With the high level of community awareness in Champaign County about Solid Waste issues, it seems very reasonable that a 90% plus participation level could be achieved through a voluntary program.*

### **Financial Incentives for Recycling**

"..but we don't see enough either for us, i.e., laws or gentle persuasion, e.g., economic incentives for up-front recycling and source reduction."

Mr. John Dickel

"..other places that also have a pay-as-you-throw-away plan and find out how easy it is to implement such plans, and to come back to us and explain why it can't be done here as easily as it is done elsewhere."

Dr. Matthew Kane

"..financial incentives such as volume-based disposal fees and the banning of recyclables..."

Ms. Lee Alekel

"We need volume-based pricing."

Ms. Lisa Bell

"The Plan should consider various options for volume-based pricing a waste a financial incentive to reduce waste and increase recycling."

Prairie Group of the Sierra Club

"Will the ISWDA staff revise the quantity-based pricing section of the plan with a more rigorous analysis providing recommendations to achieve this end?'  
'Some ISWDA members have asked whether economic flow control would be preferable to forced flow control. Could a pay-by-bag system accomplish this end by lowering tipping fees at the facility? How might such a program work? Would alternate funding systems conflict with requirements for issuing revenue bonds?'

Mr. John Thompson, Citizens for Waste Solutions

*See Recommendation #1, Part III, p. 136.*

*The necessary level of analysis cannot be completed within the framework of the plan. Given the particulars of solid waste collection and disposal and recyclable collection and processing Champaign County, it is unlikely that such a program can be adopted by simply copying a program from another area. Most successful volume based pricing programs in Illinois and around the country have the following features in common: few private haulers, municipal franchising (including rate and service structure requirements) or municipal collection of solid waste. None of these conditions currently exist in Champaign County.*

"Will the ISWDA consider quantity based pricing for residential, apartment and commercial establishments as a near term goal?"

Mr. John Thompson, Citizens for Waste Solutions

*To the extent that this would be part of a follow-on implementation study (see previous answer) for quantity-based pricing, it may be considered.*

"The Solid Waste Planning and Recycling Act states that plans "...shall include provisions for compliance, including incentives and penalties." What penalties are included in the draft plan for failing to recycle?"

Mr. John Thompson, Citizens for Waste Solutions

*The Solid Waste Planning and Recycling Act states that "...incentives and penalties" should be included in the plan. Originally, the Plan called for the development of financial incentives for recycling through the free market system. This was to be accomplished by directing all solid waste to the MR/TF facility designated in the Plan. The Plan recognizes that the tip fees at this facility would be higher than simply landfilling the waste elsewhere. This cost would be passed through to the generators of the solid waste. In turn, as generators' bills rose, they will look for alternative methods to manage their waste. Recycling services would be provided to residents at no charge. This then offers them an opportunity to reduce their mixed waste bills. Residents would look for lower service levels with corresponding lower fees from local haulers. Residents may well begin to demand variations of service not currently offered, such as pick-up once every-other week or even once-a-month pick-up.*

*However, there is interest in specific financial incentives, such as volume-based pricing, in the County. Such a program must be carefully developed to insure its success in Champaign County. The recommendation is worded to recognize the need for careful development of such a program. It would be reckless to recommend any particular financial incentive program without additional study.*

*Under both systems, the penalties for not recycling would be monetary. Generators of solid waste that do not recycle will have to pay more for the disposal of their mixed waste. In addition, penalties will be developed along with mandatory recycling if participation rates drop for 3 consecutive quarters.*

### **Apartment Recycling**

"I feel that it should be exclusively stated in the plan that a pilot program will be undertaken and that a reasonable timeline should be set for implementing the pilot, evaluating it, and then implementing a comprehensive recycling program in apartment buildings."

Ms. Tania Schusler

"..I think that apartments that are ten units or above should be included for collection of recycling."

Ms. Kimberly Majerus

"Will the ISWDA staff recommend modifying the draft plan to require private haulers to offer recycling services to commercial and apartment buildings?"

Mr. John Thompson, Citizens for Waste Solutions

*Recycling in apartments must be approached in a different manner than traditional curbside recycling. Garbage collection at large apartment buildings is handled more like commercial collection as opposed to residential collection (dumpsters vs. cans), recycling services should also follow commercial strategies. However, since apartments are residential, there is a need for special awareness and so the recommendation to do a study of 10+ unit buildings.*

*There are a number of issues that must be addressed prior to full scale apartment recycling. These include: zoning, fire and safety codes, convenience, collection style and frequency, containers and container placement and cost.*

*Since apartment collection is similar to commercial collection, there also appears to be a significant opportunity for the private sector to offer recycling services to these larger apartment units.*

### **Used Motor Oil Recycling**

"Address used motor oil"

Ms. Kim Majerus

"..used oil recycling."

Mr. Dennis Riggs

*Collection of used motor oil as part of the expanded curbside programs was reviewed in the Plan, Part III, pp. . However, liability concerns removed it as a potential additional material. These liability issues are also being displayed in Champaign, with the Community Recycling Center discontinuing its used oil program and the Naperville Area Recycling Center (NARC) dropping used oil from their curbside collections.*

*Currently, two private firms, Safety Kleen and Amoco Oil, offer collection and recycling of used motor oil. Safety Kleen, which charges for their service, focuses on large generators. Amoco Oil allows free drop-off of used oil in containers of 5-gallons or less; this is aimed at the "do-it-yourselfer." As part of the implementing agency's education programs, it is expected these programs would be promoted.*

*The liability issue is likely to precipitate legislation at the State and/or Federal level. This legislation may well include a take-back requirement for outlets that sell motor oil. In light of the existing (and possibly future programs), creation of another program for used motor oil could be constituted as a misuse of funds. The appropriate action may be to monitor the situation and determine if there are any service gaps. Once identified, the*



implementing agency may design programs to fill those gaps.

### **Household Hazardous Waste**

"Another problem with the ISWDA plan I would like to see the Board address is household hazardous waste..."

Mr. Donald Gillis

"Should develop "yellow bag" program for curbside collection of HHW"

Ms. Kim Majerus

"..households hazardous waste is not more completely addressed in the plan."

Mr. Mark Loughmiller

See Recommendation #5, Part II, p. 24.

*Although the recommendation does call for an investigation of curbside collection of HHW, there are several concerns. Controlling liability due to solid waste is a foundation of many of the recommendations in this plan. collecting commingled, household hazardous waste curbside seems to have a large number of possible liability issues. Many such wastes should not be mixed due to possible dangerous reactions. A simple example is bleach and ammonia. With residuals being mixed in a bag and then each bag being mixed with other "yellow bags," there appears to be a significant chance of explosion of some other dangerous reaction. At the Household Hazardous Waste Collection Event held in Champaign County, technicians identified materials before accepting them. This was often done by questioning the depositor. How could this type of identification occur in a curbside program? There are also materials that would not be accepted at the collection events. How would that be enforced at the curb? These are just a few of the potential issues a curbside "yellow bag" program raise.*

### **Appliance Recycling**

"Drop-off or pick-up programs for white goods"

Ms. Kim Majerus

*The private sector operates both drop-off and pick-up programs for white goods. Local scrap yards will take old appliances. A firm, D&B Recycling from Gibson City, will pick-up white goods. They also recycle freon from old appliances. As with the used oil programs, as part of education efforts, these programs would be promoted. Similarly, the implementing agency could identify service gaps and then formulate appropriate programs.*

## Paint Recycling

"Add paint exchange"

Ms. Kim Majerus

*Development of a paint exchange is included in the Plan, Part II, p. 25. The paint exchange would be part of the construction material recycling or exchange center. Champaign County residents would be allowed to bring a large number of items such as left over wood or building materials; counter tops; sinks and bath tubs; old windows and doors; including screens/storms; bricks and other masonry materials; left over mastic grout, sealant and other building or modelling supplies to the facility for exchange or proper disposal.*

## Business Recycling

"...our county solid waste plan should address this sector regardless of the ISWDA's intended participation and collection of those materials.'

'The plan makes assumptions of the private sector with no alternative plans.'"

Mr. Mark Loughmiller

*The ISWDA Board does not believe that the intention of state statutory directives found in the Solid Waste Planning and Recycling Act (PA 85-1198) is to do business planning for the non-profit or for-profit recycling industry. For-profit and non-profit recycling activities are well established and currently for-profit recycling activities account for the majority of the recycling occurring in Champaign County. The draft Champaign County Solid Waste Management Plan has analyzed current levels of recycling activity by business and activity type and has suggested areas for further commercial recycling activities (small to medium size businesses). The State legislation does not direct local government to provide contingency plans for fluctuations in commercial sector recycling activities. All recycling collection and processing activities are market dependent. As demonstrated in the analysis of material processing capacity, the private sector seeks recycling "business" on the basis of economic return on service provision and material revenue (i.e., marketability and price).*

*Currently, publicly sponsored programs collect and process materials largely viewed as uneconomic (i.e., newspaper and glass). However, if the public policy objective is to divert material from being landfilled, then this type of economic externality must be accepted by the public sector. This mandate, however, can not be forced upon the private sector.*

"Recently, a county board member suggested withholding liquor licenses to businesses which don't recycle. Would the ISWDA staff and board endorse such a measure? Would the ISWDA support expanding these measures to other small business, especially those that offer food and liquor?"

Mr. John Thompson, Citizens for Waste Solutions

*There has been little interest expressed by the ISWDA Board for a narrow targeting of commercial activities required to recycle.*

### **Material Markets**

"..material markets have not really been given proper consideration within the plan."

Mr. Mark Loughmiller

*Markets were considered in the plan, however, no attempt was made to forecast markets. For the most part, material markets are outside the realm of this plan. To account for that uncertainty in the system costs analysis, zero revenues from material sales were projected. This allows for a more accurate picture of the system costs. If revenues are received, then they can be used to offset the system costs through advance payment on debt service or lower tip fees. The revenues could also be used for program expansions and improvements.*

*The importance of markets was also was also acknowledged in the local siting criteria for the transfer station with related processing. Placement near major transportation routes not only allows haulers easy access, but allows for ready access to markets. Access to rail is also a direct acknowledgement of how important market access will be.*

*The recommended addition of cardboard/paperboard to curbside programs is due to current market conditions in the County. Collection of materials with limited or non-existent markets, such as magazines and mixed paper, was not recommended. The Plan acknowledges the limitations posed by weak recycled material markets. It also conforms to the statutory directive in the Solid Waste Planning and Recycling Act (PA 85-1198) that local solid waste plans propose recycling program "subject to the existence of a viable market for the recycled market." Recommendation #1, Part II, p. 25 also recognized the importance of identifying markets prior to banning any particular material from landfilling.*

*The draft Champaign County Solid Waste Management Plan also proposes the development of facilities to expand processing capacity as material and market demand increases. The plan also recommends preferential procurement policies for recycled goods be enacted by local governments in Champaign County. The ISWDA is supportive of state and federal efforts encourage recycled material market development.*

## **Construction/Demolition Recycling**

"The Plan should consider options that would achieve full recycling of all construction debris that is capable of being recycled."

Prairie Group of the Sierra Club

*The Plan does include construction/demolition recycling. The creation of a salvage warehouse (Part II, p. 27) and inclusion of C/D waste at any preprocessing facility. (See discussions in Part IV and waste distribution tables, Part IV, Appendix I).*

## **University of Illinois Recycling**

"The Plan should consider ways to stimulate the University of Illinois to increase significantly its fledgling recycling programs."

Prairie Group of the Sierra Club

*The University of Illinois is a State agency and as such is exempt from many local regulations. It is unclear whether the University of Illinois must follow any aspects of the Champaign County Solid Waste Management Plan. However, as a state agency, the University of Illinois must follow state directives. This includes SB 2087, signed September 1990, that requires institutes of higher learning to complete plans to reduce their wastestream by 40%. Despite the ambiguity regarding the University's legal involvement in the Plan, the University has acted in good faith in previous solid waste areas. There is a University of Illinois observer on the ISWDA Board. There was a University of Illinois representative on the Board Advisory Committee. The University is very aware of their contribution to solid waste in this County and appear to be willing to cooperate in dealing with the issue.*

## **Yardwaste & Treatment Sludge Recycling**

"Figures regarding recycling rates should be shown without the inclusion of treatment sludge in the figures"

Mr. Malcom Sickels

"Will the ISWDA staff use non-sludge, non-yardwaste basis for explaining the amount of recycling achieved in this community when communicating to the public?"

Mr. John Thompson, Citizens for Waste Solutions

*Recycling rates, both past and projected, have clearly identify the various segments which comprise the total figure. Throughout the Plan, treatment sludge is clearly displayed as*

*a separated item in the tables and graphs. The intent has always been to allow the reader to understand what the total recycling rate is comprised of.*

*Yardwaste has been included as part of publicly recycled material. The inclusion of both sludge and yardwaste recycling tonnages is a result of Illinois Environmental Protection Agency guidance on how to calculate recycling rates.*

*Yardwaste recycling is a commonly considered a part of an overall recycling program. For example, Seattle's 60% recycling rate is inclusive of yardwaste recycling. The ISWDA staff has clearly indicated in its presentations that sludge is included in the calculation base. Yardwaste recycling and diversion will continue to remain in the discussion of the recycling totals.*

### **Private Sector Yardwaste Collection**

*"The plan should recognize the contribution of the private sector (yardwaste collection) and should discourage any governmental involvement in yardwaste collection."*

Mr. Glen Stanko

*It is true that the private haulers have been collecting yardwaste for years. However, it was not until the State of Illinois banned yardwaste from landfills did local haulers begin to offer separate yardwaste collection. The opportunity to offer this service has been since 1986. In 1986, a local yardwaste reclamation site opened which provided haulers a place to take yardwaste. The majority of yardwaste site users were, governmental departments or programs and landscape maintenance firms. Clearly government intervention was necessary to propel local haulers to use the site. Currently not all haulers appear to be interest in providing this service. It may be necessary for local government to provide this collection service.*

### **Recycling: Rates and Figures**

*"Why does this draft plan ignore measures to achieve 100 percent recycling in Champaign County?"*

Dr. David Main

*At this point in time it is unrealistic to assume that a 100% recycling rate can be achieved. There are far too many variables that will determine if 100% recycling can be achieved and most of those variables, most notably markets, are outside the control and scope of this plan. It should be unreasonable to base a management plan on such a goal. It would be similar to planning for mass transit with the thought that in 20 years no one will use private automobiles.*

"Much of the reduction in waste in the whole plan comes about from this so-called mechanical separation at the new material recovery facility.'

'Where does this number come from, 12,763 tons? The plan has no explanation of this.'"

Mr. Eric Freyfogle

"The ISWDA has characterized mechanical separation as a "backstop" to existing recycling programs. Yet the appendix for Part IV shows as much as 12,763 tons of material being mechanically separated at the MRF. This is almost 3 times the tonnage of waste collected by the expanded curbside program. Isn't this application of mechanical separation a substitute, not a backstop, to other recycling programs."

Mr. John Thompson, Citizens for Waste Solutions

*Nowhere in the draft Champaign County Solid Waste Management Plan is it stated or implied that the majority of the increased recycling or waste diversion from landfills will come from mechanical separation at the new material recovery facility. The intent of the recommended solid waste management system is to establish an expanded and consistent recycling and waste diversion system. This requires a number of approaches to be undertaken beyond waste reduction activities. The activities identified in the draft Plan include: expanded residential source separation programs, expanded yardwaste composting, new municipal solid waste composting programs, new construction/demolition waste processing and material recovery from mixed municipal waste.*

*The explanation and derivation of the number 12,763 tons is found in Appendix 1 of Part IV of the draft Champaign County Solid Waste Management Plan.*

"..you plan to increase all our recycling only by a factor of 13 percent in a 20 year period. And if you look more closely at residential and commercial waste, you are only increasing it by 3 percent.'

'..those two statistics say that the recycling in your plan is too low.'"

'..say the participation in the recycling program are too low.'"

'..I though some of the calculations for the systems cost were improper.'"

'The calculations were vague, and I also thought they were biased.'"

'..is showing you that you didn't consider possibilities that would increase the recycling rate.'"

'..bias your calculations against recycling by not including them...'"

Mr. David Onstad

*The draft Champaign County Solid Waste Management Plan indicates that if the proposed solid waste management system is implemented, the base recycling rate will increase substantially. Moreover, the prime driver of the overall growth in the recycling rate is the development of sizeable increases in the public sector collection programs and*

*processing capacities. The draft Champaign County Solid Waste Management Plan is directed towards providing a system of facilities with a reasonably estimated base level of performance. Recycling, waste reduction and other waste diversion programs may always be able to do more, but they cannot do less in relation to the facility with the most finite capacity, that is, a landfill.*

*"The 25% State...goal should be viewed as a minimum goal."*

*'The plan's proposed 43% recycling rate...remains constant through 2010. However...ISWDA's plan could increase the recycling rate to 60% by...2000.'*

Ms. Deborah Rugg, League of Women Voters of Champaign County

*The State goal of 25% has been viewed as a minimum in this planning process. The County already exceeds that 25% goal. If the State goals had been viewed as a maximum, then no additional solid waste management activities would have been proposed. The current level of recycling would have been sufficient to satisfy the State mandate.*

*The percentages displayed in the Plan are meant to show the minimum levels the proposed systems would operate at. It is always possible to recycle more. As markets expand, it is anticipated that additional materials will be successfully recycled and the total percent of waste recycled will increase.*

*Originally, in Scenarios #5a and #5b, to show the minimum recycling rates, the municipal solid waste compost was included in the waste landfilled even though Illinois EPA views it as a recyclable material. This was done because it was assumed that there would be no market for the compost and it would have to be landfilled. In the revised waste distribution tables, an additional column has been added to show the total municipal solid waste compost generated. That total has also been added to the total waste recycled. This drops the percent of total waste landfilled to 34% despite the fact that the municipal solid waste compost will probably be landfilled. The amount of waste recycled is then 53%; it is 66% when the water and gas vapor lost to the atmosphere is added. therefore, the recycling rate in 1998 will be 66% or higher.*

### **Recycling: Income Source**

*"The plan must include specific recommendations for increased recycling, waste reduction and source separation. The plan should consider recycling...as a positive source of income to offset other disposal expenses."*

Ms. Deborah Rugg, League of Women Voters of Champaign County

*The plan does not view recycling as a "positive source of income to offset other disposal expenses" because historically it has not been so. Many recycling programs were begun*



*in the early 1980's with the thought that they would be revenue sources. however, reality has shown that the income from the sale of materials from curbside programs do not even cover the cost of collecting those materials. In Champaign and Urbana, 1988 revenues cover 12% and 13%, respectively, of the total recycling programs in each city. With markets further depressed and with many material prices to stay in the near future, it is unreasonable to assume that material sales can offset other disposal expenses. As markets improve, any revenues received will be used to offset expenses or to fund other programs.*

### **Collection Cost Calculations**

"It is my clients' belief that the cost of collection, transporting, and disposal is substantially overstated."

Mr. Glen Stanko

*The costs of collection, transportation and disposal of solid waste in Champaign County were derived from several sources. Trade literature (books and periodicals) was one source. Additional information was gathered from local work on collection practices and disposal. The Board Advisory Committee, formed as part of the planning process also had three local haulers represented. Information was obtained during BAC meetings and in individual meetings (to protect proprietary nature of the information). NOT all haulers on the BAC provided input; that was their choice. As a final test, a time and motion study was conducted on one hauler's residential collection route vehicles ( no commercial stops were made). Another check was made by comparing the estimated household generation levels with the average household collection bill. There was a very good fit. (See Part III, p. 47). If the costs are overstated, then the average homeowners bill should be substantially lower. Hauler comment on the cost calculations also indicated that they maybe low. The ISWDA made every attempt to obtain accurate information on local costs.*

### **Mixed Waste Processing**

"'Who do you plan to hire to stand there and do this job? Is this a new job opportunity for the high school drop-out?'

'What kind of insurance benefits are you going to offer...'

'I urge you to reconsider developing a facility that will require individuals to hand pick through mixed waste.'"

Ms. Dixie Smith-Jackson

*Under the current system of solid waste handling, there is a good deal of "handling" meaning that people must touch it. Haulers clean up areas where spills have occurred, remove wedged material from containers and related activities. At disposal sites, other handling occurs from litter control or vehicle cleaning. In addition, recyclable material handling, whether delivered as source separated material or recovered from mixed waste, is very labor intensive.*

"If mechanical separation is used, would it not make more economic and technical sense to add it to the MRF in 1995, once the nature of the waste stream requiring backstop is determined?"

Mr. John Thompson, Citizens for Waste Solutions

*The draft Champaign County Solid Waste Management Plan suggests a sequencing for facility implementation. Building design requirements for source separated and mixed waste recovered recyclables are more similar than building requirements for the composting building with in-vessel equipment. Thus, from a facility construction point of view, there would be no real advantage in deferral.*

*Secondly, the actual equipment exclusively devoted to mixed waste/mechanical separation is estimated to be approximately 10-15% of the total cost of all equipment for the MRF. In turn, total equipment costs are estimated to be about 40% of total facility costs. Therefore, mixed waste equipment is approximately 6% of the total.*

*Finally, if the capability to screen and process solid waste can be implemented sooner rather than later, the draft Champaign County Solid Waste Management Plan suggests that this would be the preferred course of action. It reduces the potential liability burden while this county relies on out-of-county landfills and implements significant front-end management of solid waste prior to disposal in a landfill located in this County. Implementation of mechanical separation will also help clarify how the landfill will operate in terms of the nature of the material to be landfilled and the nature of the user of the landfill.*

"..mixed waste is seen as a back-up.'

'..formal plan needs to be included with the solid waste plan to assure the community that mixed waste processing will not become the major recovery method. This could be done by regulating the volume by weight of recyclables allowed in the loads of mixed garbage."

Mr. Mark Loughmiller

"Why does the draft plan even mention equipment for mixed garbage recycling when that equipment in the future will not be maximally used? Why does the draft plan not mention worker compensation claims and work related injuries that will be part of mixed waste processing. Why doesn't the draft plan point out the severe deficiencies of trying to recycle from mixed waste, if it insists on mentioning recycling from mixed waste at all?"

Dr. David Main

*The cost estimates for mixed waste equipment are a minor part of the overall facility development. The most expensive equipment is that needed to process source separated materials. If there is not 100% recycling and the mixed waste equipment is used, the issue of "maximal" use is difficult to determine. The concept is that the equipment will*

screen mixed waste to remove recyclable household hazardous waste. If that equipment is used to do that, it is being used in the fashion it was intended.

"...Source separation of recyclables needs to remain a strong component of our system. Relying on mixed waste processing...will yield fewer recyclables...and also prevents the average citizen from being aware of the need to reduce the amount of waste produced."

Ms. Tania Banak

*The solid waste management plan does not rely on mixed waste processing. It offers an integrated system with several components. Using mixed waste processing will not yield "fewer recyclables." Mixed waste processing offers an opportunity to capture recyclables that otherwise would have been landfilled. Selection of any particular technology does not create an awareness block. It is questionable if the "average citizen" is aware of where their garbage goes now. It is doubtful if that awareness will be altered by the recommendation of mixed waste processing. Education is the tool that will increase the awareness of all citizens about the need to reduce waste, not a technology choice.*

"The mixed waste processing in the draft plan has many deficiencies and for this reason should be dropped in the draft plan."

'Expensive equipment to handle mixed waste would then be sitting idle, doing nothing.'

'Recovery of material is not efficient, is not easy, and it can be dangerous.'

'Why doesn't the draft plan discuss the fact that county residents will have no incentive to recycle their own waste if they know that there is equipment that supposedly recycles it for them?'"

Dr. David Main

"My clients believe that construction of (a mixed waste facility) is a mistake. They continue to believe that the underlying reason for constructing this facility is revenue."

Mr. Glen Stanko

*The draft Champaign County Solid Waste Management Plan suggests a course which expands the amount of source separated - curbside - recyclables which are collected. The Solid Waste Plan proposes to accomplish this in a number of ways: expand the number of dwelling units eligible for curbside service and expand the number of materials that would be collected by the curbside programs. In addition, there are materials that are potentially recyclable but cannot be readily collected through curbside programs. Examples of this type of material are many types of metals, wood waste and bulky items, such as appliances. To address these materials, the plan proposes to develop a centralized processing facility which will recover these materials through mechanical and*

manual means. Since the technology of processing recyclables from mixed waste and from source separated collection is similar, these processing activities are proposed to be placed in the same facility. However, this does not mean that materials, once source separated at home or work, will be mixed back into the garbage at the processing facility.

Because of the growth of recycling in the Cities of Champaign and Urbana as well as the County, the plan suggests that it is necessary to build this new facility to process the materials collected. It is suggested by these comments that the cost of mixed waste processing is expensive with the implication that the cost of source separated processing is not. It is also implied that the cost of mixed waste processing was prohibitive to the point that it would preclude any further curbside recycling. This is not true. The choice to recycle is expensive. The major cost of processing facilities comes from land and buildings. The major portion of equipment cost is attributable to the equipment to process source separated material; not the equipment for mixed waste processing.

The current curbside programs are very successful at intercepting newspaper, glass and some metals, such as aluminum. In fact, 70% of all the tonnage collected by the publicly sponsored programs consists of newspaper and 21% consists of glass. However, centralized processing or mixed waste recovery offers a way to address other materials such as bulky items, metal scrap and wood wastes. Consequently, these two approaches can be complimentary. Moreover, if people or businesses cannot or do not choose to recycle, then mixed waste processing can act as a backstop to recover materials, albeit at a reduced value. Nonetheless, recovery can occur and it is only reasonable to take all necessary steps to divert materials that do not or need not be sent to landfills.

It has often been observed that people do not know where their garbage goes once its been placed on the curbside. The same observation could probably be made about those residents of the County who participate in the recycling programs. By the time the combined mixed waste and source separated processing facility is projected to be on-line and operating (Calendar year 1992) the urban drop-off programs will have been in-place almost 10 years and the city and county recycling programs will have been operating for five years. The mixed waste processing and source separated recycling program will not be in competition.

There is no basis, in fact, to support the contention that "...county residents will have no incentive to recycle their own waste if they know that there is equipment that supposedly recycles it for them?" As stated earlier, residents in this County do not know where either their garbage or recyclable materials go. Public and non-profit programs as measured by volumes collected have sustained consistent growth rates (approximately 30% for the last five years) with little or no incentive or economic reward for the participants. One of the factors attributable to this is the education and awareness programs to encourage recycling. For the draft solid waste plan to reverse this, it would have to construct a concerted program to encourage residents to "throw it all away." There is nothing in the draft Champaign County Solid Waste Management Plan which would support such an

assertion.

*Finally, the underlying reason to build the series of facilities proposed in the plan is to implement a different sort of solid waste management system than the one which currently operates in Champaign County. It is not to provide revenue for general purpose activity. Revenues, however, will support the financial requirements to implement a system of recycling, waste reduction and landfill diversion in an integrated fashion.*

### **Composting**

"..feel that composting has not been looked at very closely."

Mr. Dennis Riggs

"Composting is also weakly addressed."

Dr. Victor S. Wojnar

*Composting is addressed in the plan in two capacities: for yardwaste and for the organic fraction of the Municipal Solid Waste. There is currently significant composting of yardwaste occurring at the Yardwaste Reclamation Site. The plan also recommends the development of a program to encourage home composting of yardwaste.*

*Composting the organic fraction of municipal solid waste is recommended as technology. Specifics related to the particular technology were not detailed due to the rate of advancement this field of solid waste management is experiencing. There are many factors that will contribute to the type of composting technology selected. That information will be obtained after the MR/TF is operating. Attempting to specify a technology, other than in-vessel, at this time is premature and could be potentially limiting.*

"What studies does the ISWDA propose to conduct in order to assess the safety of garbage composting?"

Mr. John Thompson, Citizens for Waste Solutions

*It is unclear what "safety" issues are of particular concern; Environmental impacts? Health safety? Worker safety? Equipment safety? Municipal solid waste composting has been used in Europe for quite some time without any major health and safety impacts. As stated in Part IV, there are no major environmental impacts. Issues revolving around the specifics of individual systems, such as worker and equipment safety and the quality of the end produce, will be addressed as part of the procurement process. This will necessarily require ISWDA to do any studies.*

## Illegal Dumping

"..dumping trash in rural areas continuing to be an increased problem."

Mr. Dennis Riggs

*Illegal dumping in rural areas and urban areas, such as park districts, does appear to be an increasing problem. However, there are laws regarding such dumping that are marginally enforced. It appears to be inappropriate to recommend additional measures until existing regulations are fully enforced.*

### Facilities: Environmental Impacts and Costs

"The Plan should consider more fully the environmental harms of each facility option, and should, in some fashion, make clear to readers that cost comparisons are misleading and erroneous unless they are considered in light of the relative environmental harms. In addition, the cost comparisons should include and assessment of more aggressive waste reduction and recycling measures, and should show the relative cost of the measures are against the expensive facility options."

Prairie Group of the Sierra Club

*In addressing possible environmental impacts from various solid waste facilities, in the Solid Waste Management Plan, a conservative approach was used. If there was a possibility of an impact, than it was considered an impact. Preferred facilities were selected based on minimal environmental impacts (Part IV, pp. 161-163). Cost comparisons were considered separately from environmental impacts, therefore, the costs are not erroneous or misleading and do not have to be adjusted. A scenario with just waste reduction and recycling programs was not included because it would not be possible. Any increased recycling would overwhelm Community Recycling Center; they are near maximum capacity. Regardless of the amount of waste reduction and recycling that takes place, until no one produces any garbage, solid waste facilities including landfills will be necessary for solid waste management. Only this need combined with the lack of local processing capacity made a program scenario option unrealistic.*

### Facility: Financing

"The Plan should consider, and recommend, a financing measure that does not cost the taxpayers money should the people of the County succeed in significantly reducing their waste flow through aggressive waste reduction and recycling. Any garbage guarantee should operate as a back-up funding measure only. The ISWDA should keep control of tipping fees and should raise them sufficiently so



that all operations are funded from tipping fees, no matter how low the mixed waste flow declines."

Prairie Group of the Sierra Club

*When local governments fund a project, there are two basic ways to guarantee the pay back; pledge to collect the money from property taxes or show that there will be sufficient revenues from the project to make the payments. If a local government wants to payback a bond with revenues, the financial market will review the situation and frequently ask for a guarantee that sufficient revenues will be generated. In the case of a solid waste facility, those guarantees take the form of flow control. Flow control guarantees that sufficient refuse will be coming to the facility so that, at a set tip fee, there will be sufficient revenues. The ISWDA is going to keep control of the tip fee. As the quantity of waste coming to the facility decreases, the tip fee will likely increase. This increase will be passed on to the generators of the mixed garbage. However, if there was no flow control, and the tip fee was constantly raised, then it may reach a point where long hauls to distant landfills would be cheaper. This would decrease the cost of disposing of mixed waste and undermine one of the incentives of residents to reduce and recycle. The ISWDA cannot offer more recycling without a facility for processing and that facility cannot be built without a funding guarantee by local government. By placing the costs on property tax, there is no opportunity for a resident to reduce their garbage bill by recycling; everyone pays the same regardless of the waste they generate. With revenue bonds, residents can reduce their bills by recycling, but flow control is required. Allowing residents to reduce their hauling bills by recycling by using revenue bonds was selected as the preferred financing method.*

### **Additional Study of Solid Waste Technologies**

"..look more into modern technology."

Ms. Carol Christian

"Other alternatives and technologies are available. All they need is serious, serious investigation."

Mr. Michael Jones

"..incinerators are the safest."

"I think you should look into that a little bit further."

Ms. Marilyn Lee

"..incineration is the obvious method for reduction..."

Ms. Gail R. Fisher



*Champaign County has been reviewing various solid waste alternatives and technologies since the mid 1970's. Some of the technologies reviewed include direct combustion, wet and dry RDF preparation, RDF combustion, co-disposal, biogasification, composting and material recovery. Incineration has been studied on three different occasions. Costs and market considerations have been the primary factors for rejecting incineration. Additional concerns raised today relate to the compatibility of expanded recycling programs and incineration. Incinerators are very dependent on a steady, constant flow of solid waste to insure efficient operation. If that flow is decreased through increased recycling or source reduction activities, there could be a reduction in efficiency of the facility and a possible corresponding increase in costs.*

*Other alternatives such as curbside recycling and the Hometown drop-off program, have been reviewed and implemented. Nothing is gained by waiting for a magic option or technology to solve the issue; it won't happen. An integrated solid waste management system uses parts of all aspects of solid waste management to form a system appropriate for each area. This flexibility allows previous efforts, as well as future technologies or programs to be incorporated into future systems.*

"ISWDA has essentially excluded any type of combustion-related process."

Mr. Larry Hansen

*The ISWDA has not excluded combustion facilities from review in the planning process. Incineration with energy recovery was a scenario included in the plan. Once scenario has as disposal out-of-county and the other had as disposal in-county. The final recommendation was not for an incineration facility; this does not mean incineration was excluded from review.*

### **Government Interference in Solid Waste Collection**

"The Plan is notion more than a blueprint for complete and total governmental control."

'The problem is the gate fee which will be put on the transfer station will be prohibitive and the resulting costs will be unacceptable to the people who ultimately have to bear them, the consumer, and then we will have a problem.'

Mr. Glen Stanko

*The intention of this plan is not to usurp the local private haulers' collection business. The intent of this plan is to present a workable solid waste system. The system includes collection, processing, recycling and disposal. Educational activities, source reduction and household hazardous waste are also included. It is true that unification of some of the system components is recommended as a means of streamlining recycling service provision and making it more effective. The current work has been done with the intent of respecting the existing free market collection system, not government control.*

*The Solid Waste Management Plan recognizes that there is a need to do more with the solid waste generated in Champaign County than just bury it in a landfill. Currently, due to the economics of landfilling in Illinois, economics alone is not sufficient to encourage this change. The residents of Champaign County, as represented by local elected officials have determined that the greater good is served by dealing with the solid waste issue now. Doing more to solid waste will cost more. The plan has tried to find the most cost effective system.*

### **Creation of Solid Waste Authority**

*"..waste disposal is a widespread problem without geographical parameters...the jurisdiction of a waste disposal...authority should be at least countywide, and preferable organized under independent, special legislative authority.'  
'..each waste disposal authority should bury (waste) within its own territorial limits, and not expect to dump it elsewhere."*

Ms. Gail R. Fisher

*The ISWDA is a countywide association which was developed using the most autonomous structure available for intergovernmental associations under Illinois statute. The State of Illinois does not allow the creation of special waste disposal districts except with legislative action. There is currently one such district in the State located in the East St. Louis area. Developing legislation that would allow creation of waste disposal districts by the local residents may be advantageous to many counties or areas on Illinois.*

*See Part IV, Recommendation #4, p. 181-182.*

### **Landfill Mining**

*"I propose that we sort out the recyclable materials from the current landfill."*

Ms. Eva Kingston

*Landfill mining is a relatively new activity. Pilot projects are being conducted at a few landfills across the United States. The value of this activity is undetermined. However, even if this activity were undertaken at old Champaign County landfills, it is doubtful they would be reused. After the extensive mapping performed, the old landfills do not fit the current criteria for siting a landfill.*

### **Multi-County Cooperation**

*"...opposes plan, feels should be multi-county cooperation especially with Central Illinois Municipal Joint Action Agency (CIMJAA)."*

Ms. Peggy Craddock

"..excluded merging with any unit other than within the county.

'..they have avoided some intra-county mergers that I think may be profitable.'

Mr. Larry Hansen

"I am in agreement with regional planning and feel a moratorium should be placed on siting landfills."

Ms. Carol Christian

"Multi-county input is not mentioned as an option in this plan."

Dr. Victor S. Wojnar

"..but I think several counties ought to go together and get a system that works and will be acceptable for everybody."

Mr. Bernard Hammel

"..to look beyond our own border for an answer to this question..."

Mr. Steve Moser

*The State of Illinois has placed the responsibility for solid waste management at the county level. Champaign County has been studying solid waste management for the last 8-10 years. Pursuing a multi-county approach will not absolve or reduce the Champaign County's responsibilities under State law. In fact, a multi-county approach raises several issues.*

*The first is liability. If Champaign County entered into a multi-county arrangement with the members of CIMJAA, Champaign County would have the largest population (172,000); the five counties in CIMJAA have a total population of about 99,000. This means the largest amount of solid waste would be generated in Champaign County. Therefore, Champaign County would still have the largest liability related to any solid waste activities.*

*Funding is the second issue. Since Champaign County would be the largest user of any facility, it would incur the largest cost related to those facilities. A facility sized to accept solid waste from all six counties would be larger than a facility for Champaign County and so the costs could be higher. A related funding issue will focus on planning activities. The smaller counties have a smaller revenue base. Champaign County has spent considerable sums on solid waste management planning. This planning process has included identification of landfill sites. It may be unrealistic to expect each of the five CIMJAA Counties to spend the \$50,000 - \$100,000 per county that would be necessary to complete the geological and cultural screening to identify potential landfill sites. There are also the additional costs related to site investigation, which Champaign County has already begun.*

*Joining a multi-county association will not significantly lower the possibility of a landfill or*

any other solid waste facility being sited in Champaign County. The County has expended the funds, will generate the most solid waste and will be in the geographic center of the CIMJAA. Existing landfills in the five county region would remain in the private sector. The threat of a lock-out or reduced service still exists. Champaign County also has the largest urban area which would offer the best opportunity for an energy market for an incinerator. All of these suggest that it is likely any solid waste facility selected by the CIMJAA (with Champaign County) would be placed in Champaign County.

Local officials have attended meetings of the CIMJAA and currently the ISWDA office receives minutes of their meetings. It may be appropriate to joint a multi-county effort in the future. However, joining now will not solve any of the solid waste issues faced in Champaign County now.

### **State Solid Waste Management Plan Hierarchy**

"We believe that Champaign County Solid Waste Management Plan should follow the State of Illinois Management Act (hierarchy)."

Mr. & Mrs. Robert Carleton

*The Illinois hierarchy for solid waste management was incorporated into the goals of the draft Champaign County Solid Waste Management Plan. The hierarchy does not place any specific diversion goals for each item or does it stipulate the way a community's resources should be divided between each item. The hierarchy is a way to get Illinois counties to begin developing integrated solid waste management plans. The purpose of the Act is to reduce reliance on landfilling. When coupled with local goals, as stipulated in the ISWDA Agreement, the Solid Waste Management Plan was developed to reduce reliance on landfilling while limiting the environmental impacts from those management options.*

### **Availability of Solid Waste Management Plan**

"This report addresses solid waste disposal pertinent to everyone in Champaign County, yet it was made available on a very limited and restricted basis."

Mr. Roger Kirkwood

*The Solid Waste Management Plan was distributed to six libraries in the county and to every village president or mayor in the County (see attached list). Materials accompanying the plan requested the presidents/mayors to notify residents that copies of the Plan were available at town hall. Flyers were also provided to each president/mayor for distribution regarding the public hearing. Any library calling to request a copy of the plan was provided one at no charge. The plan was available at a number of locations. In addition several full-page ads and public hearing display ads where used to promote awareness of the plan and its contents.*

## Plan Update and Review

"The plan should be updated periodically based on current data for waste generation. There should be a well-developed mechanism to continue to monitor the county's wastestream...There should be regular reports to the public and an independent entity should make a thorough review of the plan in 1996."

Ms. Deborah Rugg, League of Women Voters of Champaign County

*The plan will be updated periodically. The Solid Waste Planning and Recycling Act (PA 85-1198) requires the plan be updated every five years at a minimum.*

*See Part III, page 139, recommendation 1 under Long-Term Goals.*

*Many items, once implemented, will be regularly reported to the public at ISWDA Board meetings. Information on curbside participation is currently available to the public since the ISWDA would be operating a MR/TF and a landfill regular reports on throughput, operations, costs, etc. could only occur at public meetings.*

*The plan is currently undergoing review by independent entities. Public comment, from groups such as League of Women Voters and individuals, is a form of review. IEPA is also reviewing and commenting on the plan; they are an independent entity. Paying an outside firm of some type to review the plan is unwarranted. No other local plans, such as the In-Town Plan or the Downtown to Campus Plan, are reviewed by an outside entity. There is no reason this plan should be subject to additional review.*

## Landfill Issues

**Many of the comments on the Solid Waste Management Plan focused on specific landfill sites. It is inappropriate to address most of these concerns within the context of the Solid Waste Management Plan. The issue that should be addressed is whether the development of an in-county landfill will be part of the solid waste management system selected for Champaign County. There were some general comments received. Responses to these are appropriate since they tend to raise issues related to whether an in-county landfill should or should not be developed.**

## Long-Term Landfill Capacity

"The Clinton Landfill was not even mentioned in the Plan scenarios even though it is said to have a lifespan of 66 years ... There is no urgent need for a county landfill at this time."

Ms. Connie Messman

*The Clinton landfill is cited in the Plan, Part I. In Table 19, p. 55, in DeWitt County, the U-Dump-It landfill is what has become known as the Clinton landfill. That landfill has recently obtained an expansion permit. There have also been several other changes in the landfills in the East Central Region. Table 19 has been up-dated, see Appendix 7, Part I. It must also be noted that the information used to prepare Table 19 is provided by IEPA. There have been occurrences where the lifespan a landfill operator/owner reports to the public is different than the permitted life of the facility. Frequently the owner/operator is aware that additional permits will be required to remain open the expressed length of time. However, permits for expansions can be denied at the local level or the State level for a number of reasons. Therefore, the table was prepared only using the existing permitted capacity and lifespan of each facility.*

*In the system cost scenarios, the landfills that were used, Vermilion and Coles County are the closest facilities. However, the cost to use the Clinton landfill would be similar to those in Coles County in that it is approximately the same distance from Champaign-Urbana and costs the same to tip at.*

## Landfill Site: Near JM Jones

"Concerned over the location of a landfill north of JM Jones due to possible contamination of food."

Champaign Urbana Public Health District

*There is no landfill site north of JM Jones identified in this plan. All landfill sites are generally clustered in the southeast part of the County. A site north of JM Jones was identified as a site for a transfer and related processing facility. Concerns, such as possible food contamination are site specific and will be addressed as such if necessary.*

## Landfill Siting Criteria Development

"So where did the criteria come from?"

Dr. Matthew Kane

"..the omission of explanation and precedents (or even a bibliography) of how criteria utilized (sic) by the ISWDA came into being is a very serious and valid

concern."

Mr. Roger Kirkwood

*The Plan clearly identifies where siting criteria was developed. In the case of transfer and processing facilities and landfill facilities, there are site identification studies detailing the criteria and the final sites and are referenced in the Plan. The landfill criteria has been developed over several years by the ISWDA Board with input from consultants and the public. The criteria appearing in the Solid Waste Management Plan was prepared at the direction of the Board Advisory Committee.*

"...JM Jones objects to the self-imposed exclusionary site criteria contained in Part IV, Table 3...The Solid Waste Planning and Recycling Act...requires waste management plans to merely contain an explanation of how sites for waste management facilities will be chosen. Rather than simply offer an explanation of how this process will be implemented...the Plan adopts burdensome site-selection criteria which greatly reduce flexibility in meeting the solid waste management needs of Champaign County.'

'JM Jones is of the opinion these criteria should be deleted from the Plan prior to its being submitted...for approval.'"

Mr. Francis J. Jahn for JM Jones

*The Solid Waste Planning and Recycling Act states in Section 1 (6), "The identity of potential sites within the county where each proposed waste processing, disposal and recycling program will be locate OR (emphasis added) an explanation of how the sites will be chosen." The Act does not require that the plan "merely contain and explanation" of the site selection process. It is unclear how the site criteria in Part IV, Table 13 can be "burdensome" while the other site criteria in the plan is not. Targeting the deletion of only one of three site criteria appears to be arbitrary.*

"For the Champaign landfill location, why was the area located between and north of Champaign and Mahomet, shown to be a desirable landfill location in the ISWDA's Landfill Site Facility Identification Report using the ISWDA's own criteria, since it is not located over a regional aquifer as defined by the ISWDA criteria 1&2 and shown in Figure 6 of that report and since it is almost directly between the two municipal areas where 75% of the county's waste is generated? (ISWDA Note: The Landfill Facility Site Identification Study is the basis document for sites identified in Figure 7, page 79 of Part IV of the draft Champaign County Solid Waste Management Plan)

Mr. Robert Lozar

*A comparison of the Well map (p. 40) and the Final Composite map (p. 58) in the Landfill Facility Site Identification Study for the area referred to, indicates several important things. First the specific polygon referred to contains no well with geologic data. Second, the polygon is immediately adjacent to areas mapped from well data as containing thick*



*Glasford and Banner Formation sands. Third, the polygon is within a region (the entire northwestern part of the county) thought to be underlain by the Mahomet Sand. These factors indicate a relatively high degree of likelihood that the area is underlain by a significant aquifer and that it was not mapped as such merely because of the absence of well data in the area. The ISWDA used a conservative site identification approach to avoiding aquifers which select area that were mapped as containing little or no sand and were surrounded by area mapped the same way.*

*"The location of a landfill is a standard example of how to use Geographic Information System (GIS) technology. There are standard procedures to accomplish this. These include; closeness to urban area, closeness to paved roads, soils with low permeability, groundwaters not close to the surface. The ISWDA uses: far-ness from urban areas, paved roads not a consideration, no usage of soils data (they substituted spot data from well borings rather than continuous coverage from the county soils report even though it was already in computer form), and no consideration of groundwater depth. With GIS it is easy to adopt the standard operating procedure and then do an even more in-depth analysis using the standard operating procedure as a point of departure. In this report, the standard operating procedure was ignored or the opposite criteria was used."*

Mr. Robert Lozar

*GIS is a computing tool for management and development of map products. It comes with no standard operating procedures for specific application. The ISWDA provided criteria to the Illinois State Geological Survey and the Illinois Department of Energy and Natural Resources for use in the landfill screening activities. The Survey and Department offered counsel and advice on the adequacy of available data for addressing the criteria, but did not specify the criteria that were used. The ISWDA provided this information. State and federal regulations do make certain specifications. The criteria above are not required as part of such regulations, nor are they part of any "common practice" standard operating procedure in Illinois.*

*It should also be noted that the County soil map was digitized for this study and was utilized directly in the delineation of shallow geologic materials for the shallow slice maps in the Landfill Facility Site Identification Study. Deeper geologic units, of necessity, were delineated solely on the basis of well information. The ISWDA brought to its analysis not only the best available soil data, but also the most complete geologic synthesis for landfill site screening available. The subsurface data were not "spot data" but were maps based on well information.*

*Two additional comments on groundwater are also necessary. Beneath the nearly flat landscape of Champaign County, groundwater (water saturated deposits) is, with few exceptions, encountered at or within a few feet of the surface. Thus, a groundwater depth criterion for this county would not distinguish areas with different potential in terms of their*



*performance as a landfill site. If depth to groundwater is equivalent to depth to the first potential aquifer, then this information was available in the slice map set.*

*The Glasford and Banner Formations were identified by the ISWDA as the stratigraphic units containing the major regional aquifers in Champaign County. This is consistent with previously published work by Kempton, Morse and Visocky, 1982. Although other potential aquifers occur in the Wedron and Henry Formations, both recent and previous ISGS studies indicate that these have limited extent in comparison to the Glasford and Banner.*

*Many of the 'soils' in Champaign County do occur in areas that recharge the groundwater system. This is true in much of Illinois. However, such recharge is not in all areas directly or indirectly into the regional aquifer units. In areas that are not underlain by the thick Glasford or Banner sand deposits, it is less likely that recharge would infiltrate these units. Obviously, the farther the area from these units, the farther the water would have to travel to intersect the thick, continuous sand bodies in the Banner and Glasford.*

*The landfill facility site identification criteria are based on minimizing the potential for siting a landfill over the regional aquifer in Champaign County. Proximity to roads, waste generation, agricultural land use and the like are secondary. In addition, both state and federal regulations proscribe additional requirements regarding setbacks from wells, schools, highways, airports, taking of wetlands and historic or archaeological sites. All these criteria were integrated into the Geographic Information System application for Champaign County. In all instances, state or federal requirements were met or exceeded.*

"The ISWDA went to a great deal of effort to generate highly unreliable maps from well borings when a more reliable data source was easily available. Why did the ISWDA Report not use the Champaign County USDA soils Series map as an input to the analysis since:

- a) It is a nationally recognized standard data type regularly used in landfill siting studies.
- b) It was available in digital form from the same source that the ISWDA received its other data types.
- c) It provides a continuous surface for basing landfill siting decisions upon rather than the highly discontinuous and extrapolated (i.e. assumed) data gathered from well borings?"

Mr. Robert Lozar

*The Champaign County Soil Survey was the first digitized mapping product prepared by the ISGS for ISWDA use. Please refer to pages 32 through 48 of the Landfill Facility Site Identification Study. In addition, soil survey mapping information reflects data for the first*

*five feet of depth. The ISWDA believes that this does not provide sufficient insight on subsurface conditions to "provide a continuous surface for basing landfill siting decisions." Consequently, the ISWDA chose to work with the ISGS to construct a mapping process which would map data from ground surface to bedrock. In some places in Champaign County, the depth to bedrock exceeds 400 feet.*

"Predictions of speed of contamination of groundwaters are usually incorrect due to the fact that the predictive models assume the subsurface materials are homogenous within a type (i.e. a clay stratum). In fact, the movement of contaminated liquids in a leaking landfill run along "fissures" or "faults" in the soil matrix, similar to the fissures and faults found in rocky materials. Well borings do not indicate how "fissured" the soils materials are. Therefore, 1) Why was the critical consideration not incorporated into the ISWDA Report? 2) Is this critical consideration incorporated in the site investigations? 3) If not, why not? 4) What criteria does the ISWDA have in dealing with this question (please explicitly list criteria)? 5) How will the ISWDA investigate the question of speed of contamination due to potential fissures in the soil materials at a particular site?"

Mr. Robert Lozar

*The presence or absence of "clay 'fissure' structures" in the glacial deposits of Champaign County is not something that can be mapped with available data. A very large drilling and sampling program would be required to make such a delineation as part of the county screening effort. Even then, if fissures were found to exist, it is questionable whether the character and distribution of these features could be mapped. This and a number of the issues of siting a landfill are more appropriately addressed with a detailed site specific investigation rather than with the regional mapping that is conducted for identification of potential site areas as identified in the draft Champaign County Solid Waste Management Plan.*

*Any site chosen for landfill development in Champaign County must comply with the groundwater investigation program as outlined in Title 35 Illinois Administrative Code 811.315, Groundwater Impact Assessment. These regulations related to Standards for New Landfills, require Groundwater Contaminant Transport (GCT) modeling. Any on-site investigation program of landfill development in Champaign County will conform with and utilized any GCT models approved by the Illinois Environmental Protection Agency.*

"If the criteria for the landfill is based on many natural patterns (e.g. location of aquifers, streams, woodlands, wetlands, etc.), why is the scope of the report limited to Champaign County? Since the ISWDA report suggests that a particular outer edge of the county is most suitable, why was the study not extended in the obvious direction beyond the arbitrary political edge to find a more suitable location? Since Champaign County currently uses a landfill just over the border of the county in adjacent Douglas County, a site evidently already adequate, why was the section of Douglas County not considered either originally or now as the

obvious potential location for the Champaign County landfill?"

Mr. Robert Lozar

*The charge from the Champaign County Board was to conduct solid waste management planning for Champaign County. The mapping effort undertaken by the Illinois State Geological Survey on behalf of the ISWDA cost approximately \$80,000. It is not known whether the ISWDA or Champaign County is empowered to do landfill site suitability mapping for other adjacent counties. Adjacent counties are aware of our work and have not expressed any interest in having the ISWDA do similar work for them. As a point of clarification, the landfill located in Douglas County closed July 1, 1990. The majority of Champaign County's waste now goes to Vermillion, DeWitt and Coles Counties.*

### **Prime Farmland**

"Landfill criteria totally disregards the productivity of prime farmland ... "

Ms. Connie Messman

"The District feels the protection of Prime Farmland is important to the future of the County. We urge you not to locate the proposed landfill on Prime Farmland."

Mr. Kenneth Kesler, Champaign County Soil & Water Conservation District

"The Farm Bureau is opposed to the siting of a landfill in the County. If a landfill is sited, it should be on land other than prime farmland."

Mr. Jerry Wallace, Champaign County Farm Bureau

*Farmland productivity was not totally disregarded in development of the landfill siting criteria. The current criteria calls for a Land Evaluation and Site Assessment (LESA) evaluation of the selected landfill sites. Part of the LESA evaluation reviews soil productivity. Prior to settling on this approach, several other approaches were considered. Attempts were made to obtain information on crop yields by section from the University of Illinois, the Farm Bureau and the US Department of Agriculture. This information was to be digitized for inclusion into the GIS work done for ISWDA by IDENR. However, no complete database exists with this type of information.*

*Soil types were digitized by the ISGS. However, in general, all the soil in Champaign County is considered productive. There is insufficient differentiation between levels of productivity to require a separate map.*

*There was also a discussion about performing a LESA evaluation on the entire county. However, this appeared to be unreasonable. Discussions with the LESA coordinator for the Champaign County Soil and Water Conservation District confirmed that a LESA evaluation on a County-wide basis would be unreasonable; site specific evaluations were the appropriate method to use.*

*Farmland productivity has not been disregarded. It has been discussed and various attempts to incorporate it into the criteria have been reviewed. The most appropriate was determined to be the LESA evaluation on a site specific basis.*

*The soils present on over 96% of the land in Champaign County are considered "prime" agricultural soils. Approximately 18,972 acres (2.9% of the county) contain "non-prime" soils and an additional 3,613 acres (0.6%) are occupied by soils "of state-wide importance." The non-prime soils are made up of small areas with steep slopes (over 15%), found along stream banks or are soils that have been disturbed for development such as gravel pits, highway and railroad embankments or developed urban land. The soils of state wide importance generally occupy very small areas and are found in or near floodplains or lie over areas with sand or loamy subsoil. Consequently, the prospects of finding a suitable landfill site in Champaign County that is not occupied by prime soil is extremely small.*

### **Drainage**

*"Drainage of potential landfill sites has not been addressed"*

Mr. Richard Schwartz

*Determining the impact of a landfill on drainage is a very site specific activity. It is recognized that excavations in agricultural areas may impact drainage in the area. However, these determinations can be studied in detail only with specific sites. The landfill site design will review and study the impact on drainage at a specific site. Any impacts will be remediated in accordance with existing regulations.*

### **Ground and Surface Water Research**

*"We do not think that adequate research has been done on the dynamics of the ground water and surface water of the Embarras River system."*

Mr. John McNussen

*It is not within the scope of the ISWDA to conduct major investigations into the dynamics of the ground and surface water systems within Champaign County. In the course of developing the landfill criteria, existing information was used to identify such features as flood plains along surface waterways. The 500 foot set-back from perennial streams is a response to that information. Groundwater investigation will be conducted as part of the site specific investigations for the top landfill sites. Preliminary tests will determine if the groundwater dynamics can be identified. More intensive hydrogeological testing will also be completed prior to a final determination on a landfill site.*

## Post-Closure Costs

"'You've got to look over a longer period of time.'  
'..landfill for taking post-closure. You do not have those provided for you in this plan before you.'"

Ms. Marilyn Lee

*Post-closure care costs for the landfill are incorporated in the annual operating and maintenance costs for any scenario with an in-county landfill. (See Part IV, Appendix 1) For an in-county landfill, beginning in 1995, approximately \$265,000 annually would be collected for post-closure care. In twenty years, there would be about \$8.7 million dollars (adjusted for inflation) available for post-closure care. In addition, the annual operation and maintenance costs include a fund for landfill closure. Beginning in 1995, \$122,700 dollars annually would be collected for closure costs. In twenty years, adjusting for inflation, the closure fund would total \$4 million dollars.*

*These cost estimates were based on the proposed Illinois Pollution Control Board revised landfill regulations. These regulations were adopted, without any major changes in August 1990. In addition, the siting body (in this case, the County Board) may place additional requirements, including higher post-closure funds on the owner of the facility. The ISWDA, as owner, would have to comply and increase the annual amount collected for post-closure care. If additional landfill requirements develop in the future, just as current landfills are doing now, the ISWDA landfill will adjust its annual collections to generate sufficient funds.*

## Shallow Aquifer Contamination

"The state geological survey reports that I read indicate that this is the most sensitive aquifer area in the county..."

Mr. Larry Hansen

"Illinois State Geological Survey Circular 532, "Potential for Contamination of Shallow Aquifers in Illinois" (1984) which was done at nearly the same scale as the ISWDA Site Report (i.e., about 1:62,500) shows that those areas which are dangerous for siting landfills are those which the ISWDA Report shows are best for siting landfills. How can the ISWDA justify the fact that they are getting results which are opposite those of the State of Illinois?"

Mr. Robert Lozar

*There are several major differences between the ISGS mapping done at the direction of the ISWDA and the ISGS mapping for Circular 532. First, the ISGS Circular by Berg, Kempton, and Cartwright (1984) contains a statewide map at a scale of 1:500,000 (about one inch on the map represents 8 miles on the ground). At such a scale, maps seldom*

distinguish features less than about 1 square mile in size. In addition, the generalization necessary on such a map greatly limits its applicability for county-level screening activities.

Second, the ISGS geologic mapping done for the Landfill Facility Site Identification Study was conducted at a scale of 1:62,500 (one inch on map represents about one mile on the ground). Such a scale can resolve in much greater detail the variability of the geology of the county and is the standard scale selected by the ISGS for county landfill screening.

Third, the geological mapping conducted for the Landfill Facility Site Identification Study included a large number of wells and other observations not included in the 1984 Circular, which was based on 1979 statewide Quaternary Deposits mapping (Lineback et al, 1979) and an evaluation of 25,000 well borings statewide (Berg et al, 1984, p. 10). This is an average of about 250 wells per county. The geologic mapping for the Landfill Facility Site Identification Study considered records from over 3,000 wells in Champaign County, and additional wells in adjacent areas.

Finally, and most critically, the 1984 map (Berg et al) mapped only to a depth of 50 feet and is truly intended only for identification of "shallow" aquifer contamination. The geologic mapping for the Landfill Facility Site Identification Study extended from the surface to bedrock (everywhere greater than 75 feet and up to 400 feet in some areas). In virtually all of Champaign County, the major aquifers in the Glasford and especially those in the Banner are deeper than 50 feet.

The ISWDA believes that the map by Berg et al (1984) is of too small a scale for a detailed county screening and does not map deep enough to identify regional aquifer units whose protection the ISWDA has identified as a primary criteria. The ISWDA has a much better basis for decisions, because it has utilized more recent, deeper, larger-scale mapping.

### **Mitigation and Compensation Issues**

"Are we to assume that the county will perpetuate the expensive and ludicrous option of hauling water ad infinitum?"

'..water replacement should be in place before the operation of a landfill in any rural area with shallow aquifers.'

'..I have never seen any adequate source of funds being identified for the water replacement necessity.'

'..does not seem to have a plan to treat the leachate collected for the landfill site.'"

Mr. Larry Hansen

"I would like to know what ISWDA, Champaign County, City of Urbana, or the City of Champaign are going to do about our water.'

'Are you going to reimburse us for the devalued property and our homes?'



'Are you going to reimburse the Heritage School District Number 8 for loss of tax money from the devalued homes and property?'  
'What about the truck traffic by our homes?'  
'How are we to deal with that and our farm machinery on the roads?'  
'Who will see to it that there is no blowing litter?'  
'What about the stink and rodents around a landfill?'  
'And what about the mud on the roads coming out of the landfill?'  
'What are we to do about the traffic?'  
'What are we to do about rodents, and what kind of health problems will that bring?'"

Mr. Robert Mitsdarfer

"..can you guarantee that any country site won't end up being the site of, say, a recycling center?'  
'..spillage by my church in areas of health care, money and labor?'  
'Where is the safeguard against that certain risk?'"

Mr. Tony Trosley

"..you aren't too concerned about the water supply of the rural areas."

Mr. Michael Jones

"..additional protection from economic devaluation and water contamination must be provided to residents and property owners who are within one mile of the perimeter of the landfill site and any others who will be affected by landfill operations."

Mr. & Mrs. Robert Carleton

*The issue of mitigation and compensation for the neighbors of any solid waste facility is site specific. It would be premature to create a detailed program without input from the affected neighbors. Each site has a different set of affected neighbors and each group of neighbors may have different concerns. Since the mitigation and compensation program will be intended to address the affected neighbors' concerns, it is logical to wait until the affected parties are identified. Only then can their concerns be incorporated into the program.*

*Many of the issues raised, such as truck traffic, litter, traffic and potential property value declines are generally include din mitigation and compensation programs. Also included could be water testing and replacement aesthetics.*

*Liability for post-closure care and mitigation of solid waste facilities have been incorporated in the cost calculations in the Solid Waste Management Plan.*



## **Future Landfill Expansion and Government Control**

"..the owners will sell out cheaply and permit them to expand the buffer zone so that the original landfill space can be lucratively expanded?"

Mr. Larry Hansen

"For instance, what can you offer us beyond a 20 year period, when it comes to making sure that a landfill won't have to get bigger?"

Mr. Tony Trosley

"What guarantees do we have that future ISWDA Board members and managers will be committed to retaining control to ensure its proper operation?"

Mr. Michael Mooney

*The ISWDA Board is committed to maintaining ownership of solid waste facilities. If there was any question of retaining ownership, the ISWDA would not be prepared to invest the necessary, substantial capital in the development of solid waste facilities; the private sector would be allowed to do it.*

*Local government will also reduce their liability if they retain ownership and control of any solid waste facility. Liability as a potential responsible party in landfill remediation cases could cost a municipality a significant amount of money. And finally, the local representatives are elected by the citizens of Champaign County. As long as the residents feel it is appropriate to maintain ownership of these facilities, it is their responsibility to ensure that the elected officials are aware of their opinion. Expansion of the landfill will then be in the hands of those elected officials.*

## **Future Liability**

"..do we truly want to burden our children, future taxpayers of Champaign County, with a leaky landfill?"

Mr. Michael Jones

*The future residents may well be burdened with a leaky landfill if solid waste continues to be shipped out-of-county; the landfill just won't be in Champaign County. However, if Champaign County garbage is in an out-of-county landfill, future residents may well become financially responsible for cleaning up that landfill. By having a landfill in the County under local government control, this liability will also be under local government control. By insuring the best designed landfill is built in the appropriate geological location with extensive front-end management (i.e., recycling, composting and waste processing) prior to disposal, the future liability will be significantly reduced.*

## Admission of Out-of-County Garbage to Landfill

"There are two loopholes that would allow out-of-county out-of-state garbage into the landfill: (1) a new entity could be added to the ISWDA Board, (2) certain authorized garbage trucks could haul to the landfill with out going to the transfer station"

Ms. Connie Messman

*See rewording in Part IV, Recommendation #8, p. 176.*

consum.ljm



MEMORANDUM

DATE: October 22, 1990  
TO: Kurt Bressner, Village Manager  
FROM: Ellen K. Apple, Recycling Coordinator *ELK*  
RE: September Report from Rot's Disposal

I recently received the September report on the Village's solid waste management program from Rot's Disposal. The following is a summary of that report.

The sample count of 302 addresses in the Village has offered consistently excellent results. Refuse and yard waste volumes in September were 57% and 94% lower, respectively, than in April. Households in the sample area set out an average of 1.5 bags/cans/bundles per week. This weekly generation rate translates into an average monthly service cost of \$8.06, compared to \$12.75 under the previous flat-rate system.

Below is a comparison of refuse and yard waste volumes for the past five months:

	<u>Refuse</u> <u>(bags/cans)</u>	<u>Yard Waste</u> <u>(bags/cans)</u>	<u>Bundles</u>	<u>Miscell. Trash</u> <u>(cu. yds.)</u>	<u>Large</u> <u>Items</u>
April	861	341	263	59.25	12
May	410	55	28	0.00	2
June	418	62	15	0.50	3
July	371	68	7	1.00	10
August	368	29	3	0.00	3
September	374	35	0	0.00	8

Sticker sales volume remained low and was closely matched to actual usage during September. Retailers purchased 65,000 stickers (53,500 refuse, 11,500 yard waste). Village Hall purchased 6,000 stickers (5,000 refuse, 1,000 yard waste). The total amount of stickers allows for 1.3 stickers/household/week, a number which closely matches the estimate of 1.5 which was derived from the sample of 302 addresses.

The ratio of refuse stickers to yard waste stickers has fluctuated between 4.1:1 and 5.1:1 since the start of the pay-per-bag program. September's ratio remained well within that range, at 4.7:1.

Weekly recycling set-out rates have been consistently high since April. In September, the average set-out rate on the north side of the Village was 75.3% and on the south side, 81.5%.

September was a month of extreme volatility in the old newspaper markets. The major paper recycling company in Illinois, FSC, decreased the amount it was willing to purchase from many haulers. Rot's, which had previously sold 560 tons/month to FSC was limited to 400 tons/month in September. Rot's was able to sell approximately 150 tons/month to Chicago Paperboard, and had to store the rest in Browning-Ferris Industries' facility in Melrose Park. Market prices for newspaper were \$0.00 to \$5.00/ton. Many haulers are already paying up to \$10.00/ton to deposit old newspaper for recycling, a situation which is a very real possibility for Rot's in the near future.

Other commodities fared better than newspaper. Aluminum, still enjoying a strong market situation, was sold for \$.53 to \$.55/pound. Plastic milk and water jugs were sold by Rot's for \$.08/pound to the Plastics Recycling Alliance, a joint venture between DuPont and Waste Management. Glass, however, dropped in price to \$.015/pound from \$.02/pound. Glass recyclers are continuing to be very selective about the loads they purchase. Loads must be color-sorted and contaminant-free in order to receive \$.015/pound.

Listed below are the poundages of recyclables collected to date, and the poundages collected in September:

	<u>September</u>	<u>May-September (inclusive)</u>
Newspaper	475,380	2,012,788
Glass	157,060	707,208
Plastic	6,680	41,322
Aluminum	15,420	75,415

I hope that this information is helpful to you. Should you have any questions or wish further information, please let me know.

MONTHLY REFUSE, YARD WASTE, AND RECYCLABLES REPORT

VILLAGE OF DOWNERS GROVE

September 1990  
(month)

Report completed by: ARUCE GREENWOOD, ROT'S DISPOSAL SERVICE  
(name)

1. (a) Count of 300 addresses - to be completed once monthly.  
Completed 9/18 & 21, 1990.

# of bags/cans of refuse 374

# of bags/cans of yard waste 35

# of bundles of yard waste 0

# of "other" items 12 TOTES - R - 5 TOTES YW - 2 CHAIRS  
2 MATTRESSES - 1 STORAGE CHEST - 3 ROLLS C

(b) Recycling bin set out rate in Village - to be calculated each pickup.

Date	# of recycling bins set out
9/5 4131	9/14 5591
9/8 6116	9/18 3971
9/11 3957	9/21 5783
	9/25 3894
	9/28 6154

2. A total of 5550 (compacted)/(loose) cubic yards of residential refuse was collected and landfilled.

3. A total of 506 (compacted)/(loose) cubic yards of residential yard waste was collected and agronomically applied.

4. Net Profit (Loss) from Sale of Recyclables:

Proceeds from Sale of Recyclables \$ 12,128<sup>15</sup>

Cost to process Recyclables

transportation	\$ _____
labor	\$ _____
interest on machinery and equipment	\$ _____
other	\$ _____

Net Profit (Loss) \$ \_\_\_\_\_

5. Copies of Complaints and Action Taken (Attached) NONE

6. Detail of Material and Volumes Recycled (Attached)

WEEKLY TABULATION OF MATERIALS COLLECTED

AREA VILLAGE OF DOWNERS GROVE

DATE:	<u>9-18-90</u>	PARTICIPATION	<u>3971</u>
Paper	<u>52,820</u> lbs. @ <u>.0025</u> /lb = \$		<u>132.05</u>
Aluminum	<u>1,380</u> lbs. @ <u>.55</u> /lb = \$		<u>759.00</u>
Glass	<u>15,540</u> lbs. @ <u>.015</u> /lb = \$		<u>233.10</u>
Plastic	<u>680</u> lbs. @ <u>.08</u> /lb = \$		<u>54.40</u>
TOTAL			<u>\$ 1,178.55</u>
DATE:	<u>9-21-90</u>	PARTICIPATION	<u>5783</u>
Paper	<u>86,680</u> lbs. @ <u>.0025</u> /lb = \$		<u>216.70</u>
Aluminum	<u>2,420</u> lbs. @ <u>.55</u> /lb = \$		<u>1331.00</u>
Glass	<u>24,820</u> lbs. @ <u>.015</u> /lb = \$		<u>372.30</u>
Plastic	<u>1,220</u> lbs. @ <u>.08</u> /lb = \$		<u>97.60</u>
TOTAL			<u>2,017.60</u>
DATE:	<u>9-25-90</u>	PARTICIPATION	<u>3894</u>
Paper	<u>49,820</u> lbs. @ <u>- 0 -</u> /lb = \$		<u>- 0 -</u>
Aluminum	<u>1,360</u> lbs. @ <u>.55</u> /lb = \$		<u>748.00</u>
Glass	<u>14,800</u> lbs. @ <u>.015</u> /lb = \$		<u>222.00</u>
Plastic	<u>680</u> lbs. @ <u>.08</u> /lb = \$		<u>54.40</u>
TOTAL			<u>1,024.40</u>
DATE:	<u>9-28-90</u>	PARTICIPATION	<u>6154</u>
Paper	<u>69,540</u> lbs. @ <u>- 0 -</u> /lb = \$		<u>- 0 -</u>
Aluminum	<u>1,840</u> lbs. @ <u>.55</u> /lb = \$		<u>1,012.00</u>
Glass	<u>20,400</u> lbs. @ <u>.015</u> /lb = \$		<u>306.00</u>
Plastic	<u>1,020</u> lbs. @ <u>.08</u> /lb = \$		<u>81.60</u>
TOTAL			<u>1,399.60</u>
			<u>12,128.15</u>



**CURRENT MONTH RECYCLING RECAP**

	<u>Volume (lbs)</u>	<u># Days</u>	<u>Lbs. per Day</u>	<u>% of Total</u>
Newspaper	475,350	5	59,420	73.7%
Glass	157,060	5	19,630	24.9%
Plastic Jugs	6,680	5	835	1.7%
Aluminum Cans	15,420	5	1,925	2.7%
	<u>654,510</u>			<u>100 %</u>

**RECYCLING HISTORY - POUNDS PER DAY**

	<u>Newspaper</u>	<u>Glass</u>	<u>Plastic Jugs</u>	<u>Alum. Cans</u>
May, 1990	60,795	19,050	1765	1710
June	55,575	20,275	1265	2585
July	43,390	19,590	730	3175
Aug.	57,655	19,550	765	2205
Sept.	59,420	19,630	835	1925
Oct.				
Nov.				
Dec.				
Jan., 1991				
Feb.				
March				
April				

**STICKER SALES**

Number of stickers sold to retailers	<u>65,000</u>	(53,500 R x 11,500)
Number of stickers sold to Village Hall	<u>6,000</u>	(5,000 R x 1,000)
Number of stickers sold at Rot's	<u>—</u>	
x \$1.21 = amount received for costs of collection and disposal	<u>\$ 85,910.00</u>	

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A CONSERVATIVE REGARD ON LANDFILL & RECYCLING

1. Freeloading cities should pay 100% of township, and county road upkeep leading to landfills. Farmer residents should not have to pay any equal taxes toward establishment nor maintenance of the landfills.
2. Local inspectors are necessary to prevent local businesses, and householders from dumping toxic chemicals. Exported garbage be barred at the entrance. I would suggest a parking lot style of ticket gate for every vehicle to prevent after hours dumping without inspection.
3. Illinois prohibits householders yard, and garden from inclusion with their garbage, then let Illinois bar householders from inclusion of their non-biodegradable spastic plastic trash. This would impel householders to purchase durable goods made of metal. I realize that durable products fail, but they can be disassembled into 100% recycleable metals. In this regard, I noticed clear spastic plastic refrigerator dishes lasted about a month. Thirty years ago I bought my wife Vollrath stainless steel refrigerator dishes with lids. The two sets of four dishes each are just as nice as they were when new, hence no need to landfill them.
4. Require hand sorting at the source. We already have recycling of newspapers, cans, glass, and plastic milk jugs. Old clothing was once sold to scrap dealers, consequently this avenue should be pursued aggressively. What about rag content paper made of recycle paper with recycle rag contents. I would question inclusion of man made fabrics. Cotton fabrics are cooler in Summer, and warmer in winter. Boosting cotton as a primary clothing need should increase acreages planted to cotton thus serving to reduce surplus grains. One additional benefit is that man made fabrics made from imported petroleum derivatives would not be increasing the trade imbalances. It was my understanding in the 1930's that some Western Story magazines used recycled paper in which old inks were not completely removed, hence a grayish cast. I can see no reason why perfectly white paper be necessary today.
5. We must incinerate non toxic waste wood, paper, and fabrics which might bar man made fabrics. If a city's output of approved waste cannot provide a continuous supply for economic stability, then we suggest a larger area be included.
6. A disabled Viet Nam Veteran sought assistance 9 April, 1990 from Congressman Terry Bruce to set up his own small business to reclaim durable goods appliances using disabled workers. What they could not repair for resale, they would disassemble, and sort into the various scrap metal bins for sale to scrap dealers. The young man had worthwhile ideas, but no capital. I offered him a suggestion about porcelain clad appliances which scrap dealers will not accept. That they cut the cabinet parts into flat sheets, and run them through a sheet metal roller to chip off all the porcelain leaving acceptable sheet metal scrap. This idea could be used for community service offenders, or else done in prisons which are quite near.

- Scrap dealers will not accept old water heaters. This is an easy matter, remove the jacket, take out the insulation, and the metals are immediately acceptable scrap. I have sold such an appliance.
7. Volume, and stench of restaurant garbage is the most frequently cited objection to landfills, as well as rodent attraction. Let us resort to an old 1930's technology with several changes. Pick up restaurant garbage daily, and feed it to hogs on a concrete floor that can be washed. Always have more hogs than the garbage will support so that additional hog feed will be required to assure that the garbage will be consumed. Illinois dictated that garbage be cooked before feeding to hogs blaming swine trichnosis on the swill, but I strongly doubt prevalence of such a condition. My aunts raise dachshunds in California. I was there the day a pet food dealer restocked their dogs meat freezer with frozen meats for the dogs. Therefore, we could avoid cooking the swill, feed it to the hogs, then slaughter the hogs, freeze the meat, and then supply breeders, and pet owners. The slaughtering would not be done where human food was processed. Another outlet would be selling live hogs to canned pet food manufacturers.
  8. Too much direct mail solicitation goes directly to landfills without even being opened. Congress must mandate first class postage on all mail, and eliminate business expense deductions of direct mailers. Congress must tax all sales of mailing lists. All Church, and fraternal mailings should pay first class postage. Why, the answer is that they never cease bothering disinterested addressees consequently that mail is placed in the trash. Following a three month European vacation, we had three large grocery bags of mail. The first day, I dumped one bag of unopened mail, the next day, I opened the mail, I trashed all but a stack about six inches high. This is an example of flooding homes with useless mail.
  9. Jawbone businesses that mail or newspaper insert clay coated color advertising that recycle stations do not accept. Those who ignore jawboning would simply face a demonstration. Demonstration would only require saving each store's ads for a month or so, maybe one hundred people would be enough to assemble, enter such stores, and strew the unwanted ads all over the store with media invited.
  10. There is an urban cat litter box landfill problem that farmers never encountered.
  11. Bar all plastic meat, and grocery packaging.
  12. Bar all appliances, and lawnmowers as well as bicycles from landfill. Ban all furniture discards from landfills. All can be disassembled with metal parts for recycling, the screws, and bolts can be used again. I do it myself, I sold \$38.35 of scrap brass, aluminum, and copper recently with the check made out to The Salvation Army. I have used up nearly all old discard furniture wood for crat work. That wood is excellent quality. These disassembly operations could be accomplished by community offenders under supervision of handicapped. This is in effect recycling the human element too.

13. Require all automobile owners continue licensing, and insuring all unused vehicles. This would decrease old vehicles appearing in slum areas as well as rural slum residents. The cost alone would convince owners to patronize junk dealers.
14. Organizations, Churches, and fraternal bodies refreshments, coffee breaks, and snack times generate single use non-biodegradable plastic cups, dishes, and tableware waste. This practice must be stopped by barring it from landfill inclusion. Formerly, chinaware, and silverware were washed which required elbow grease. Besides, it would give the overeager an opportunity to do something useful. Better restaurants provide cloth napkins, one cafeteria provides cloth napkins at a small charge or free paper napkins so let us ban paper napkins. I have old linen napkins hand hemmed by my mother's aged crippled aunts 80 years ago for a wedding present. Let us consider every acre every acre planted to flax does not compete with grain farmers.
15. Let us consider air freshener spray cans, they end up in landfills because of danger. An offensive house smell never bothered my mother, she would drop a few thin apple slices upon the hot cast iron lids of her kitchen range which promptly eliminated the odor, and the burned slices were eaten by chickens or hogs.
16. Every chemical should be rerefined same as used oils. In the 1930's creameries gave farmers their waste cream test residues. They were cream samples with pure sulphuric acid. We applied the test wastes to Canada thistles.
17. Dumping toxic chemicals in a landfill in any sort of container is OUT. No matter what paid experts claim about impervious clay under a landfill, their theories leak too, any liquid will seek it's own level. An example of no satisfactory dam around was news reports of a flood scattering PCB far beyond the landfill. A dam does not stop precipitation over a landfill, as per news pictures of a toxic flow from the troublesome closed Danville, Ill. dump to the dismay of alarmed neighbors. What can be done? Spain cut off the Gibraltar water supply to oust the British. I saw the light weight roof like precipitation collector engineered by the British. It was on one side of the rock with rainspouts leading to the municipal water supply from which I drank. The most logical first installment would be over the oozing Danville, Ill. closed dump.
18. The bulldozer wrecker is another problem. The wood should be salvaged, and the rest incinerated. The metals recycled, and the good bricks recycled. I saw new homes built in 1928 by affluent citizens of Detroit, Michigan from used bricks which soon gave them a stately old looking mansion. Concrete should be crushed for use in building projects.
19. Big volume waste has become a way of life, hence the need to think big for some speedy results. We are fighting attitudes that should have been corrected long ago.

1/3/91

Emmett Kirby  
710 South Prairie St.  
Champaign, Illinois  
61820

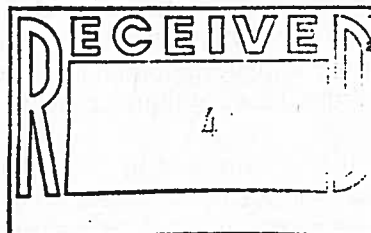
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January 14, 1991



Intergovernmental Solid Waste Disposal Association  
209 West Clark Street  
Champaign, Illinois 61820

Re: Champaign County Draft Solid Waste Management Plan

Gentlemen/Ladies:

As you know, I represent a group comprised of a number of smaller sanitary hauling businesses in Champaign County, Illinois. On December 5, 1990, I gave an oral presentation regarding the draft plan at the public hearing. This letter is my written submission on behalf of these sanitary hauling businesses.

Given the length of the draft plan, the voluminous number of statistics incorporated in the plan, and the complex nature of many of the calculations, it is impossible to address more than a few areas of specific concern. It should be noted, however, that the omission of any comment about any aspect of the plan does not necessarily signal agreement. In fact, I think it would be safe to say that my clients are in general disagreement with the plan in its entirety, particularly its recommendations.

**COST OF COLLECTION, TRANSPORTATION,  
AND DISPOSAL**

The figures and calculations regarding the cost of residential solid waste collection, transportation, and disposal are of initial concern. They are found primarily in Section Two of Part III (recycling) and include those calculations contained in Appendix Two.

It is my clients' belief that the cost of collection, transportation, and disposal is substantially overstated. For example, it was assumed that the average distance between stops was 995 feet and that only one customer was serviced per stop. As was acknowledged on page 2-3 of Appendix Two, these assumptions were based on observations of one local hauler's route.

Unfortunately, the hauler which was observed primarily services commercial customers. As a result, the residential stops would be much further apart than those of a hauler whose business was primarily residential. While it is understandable that the observed hauler would service only one customer per stop, that type of service is also not necessarily the rule. It is absurd that the data gathered from this route would be the sole basis for the calculations regarding collection costs.

Density capacity is seriously understated in the calculations, which leads to a much higher cost per ton. Those figures do not reflect the climate subsequent to the closure of the Urbana landfill in November of 1988. After the landfill closed, many haulers moved to high compaction equipment capable of generating 1,000 to 1,200 pounds per cubic yard. The use of the small density capacity figures not only infects the collection calculation, but skews the transportation and disposal costs as well. It is one of the many examples in the plan of the use of antiquated data.

Other figures which serve to inflate the cost of collection, transportation, and disposal include the assumed labor costs and the assumed cost of the units. The figure which is generally used throughout the plan for the cost of collection, transportation, and disposal (\$74 per ton), in reality, may be more than 1 1/2 times the actual cost as of the end of 1990.

Ultimately, it appears that the cost of collection was not utilized in comparing the various alternatives presented in the draft plan. However, adoption of a solid waste plan for Champaign County will, whether rightly or wrongly, give some indicia of reliability to the figures contained in that plan. As a result, future governmental action may be predicated on statistics which have no actual basis in fact.

On the other hand, it appears that the calculated cost of transportation and disposal is factored into the various cost comparisons made of the possible alternatives. Cost justification of the recommended course of action is therefore rendered worthless.

#### TRANSFER STATION WITH MATERIAL RECOVERY

The draft plan ultimately recommends that a transfer station with material recovery be constructed in Champaign County (Part IV, Section Six, pages 173-177). This recommendation is not surprising in light of ISWDA's current commitment to such a mixed waste facility. My clients believe that construction of such a facility is a mistake. They continue to believe that the underlying reason for constructing this facility is revenue. In other words, the governmental authorities are looking for a source of funds to satisfy the significant debt which ISWDA has already accumulated.

The major problem with a transfer station is cost. Tip fees will, of course, reflect costs. My clients believe that the projected tip fees for the transfer station are already significantly understated and will continue to increase between now and the time the facility would be completed.

The consumer will ultimately be the one to bear the costs. However, there comes a point when the consumer will say that enough is enough. The ultimate result will be a negative impact upon the private hauler.

With respect to the materials recovery component of the transfer station, some of my clients involved in recycling are in total agreement with the viewpoint of the environmentalists and the public. There is no room for mixed waste recyclables in the already glutted recycling markets. The only realistic markets available are for source-separated materials. Recycling will have to be done through source separation for that reason alone.

The law requires a 15% recycling recovery rate within three years and a 25% recycling recovery rate within five years. According to the draft plan (Part III, Table Six, page 37; page 54) and the executive summary (page 8), Champaign County's calculated rate for 1988 was 30%, which exceeds the five year target. As I understand it, with the materials recovery component of the transfer station, a 43% rate of recycling is projected. (Executive Summary, page 32) At best, then, the transfer station with material recovery would garner an additional 13% in recycled materials with virtually no markets available for this additional material. The expense of this mixed waste processing plant simply cannot be justified for this small percentage, particularly when the more cost effective alternative of mandatory recycling would yield a higher recycling rate. Mandatory recycling would also produce quality materials having much greater market potential.

The draft plan gives little consideration to mandatory recycling, apparently on the assumption that it cannot be enforced through the present collection system. As a result, no serious study has been given to incorporating mandatory recycling within the current collection structure. The plan completely ignores the existing wealth of collection experience and expertise in the private sector, which has the capability to collect recyclables on an economically-viable basis, and therefore eliminate government participation and expense in that area. Instead, the plan blindly commits Champaign County to a much more expensive course of action, which is unsatisfactory in terms of cost, quality of recyclables, and, eventually, even in quantity of recyclables.

At most, government should concentrate its efforts on providing facilities to process the source-separated recyclables. The collection efforts, including the manner and method of pickup and the pricing, should be left to those businesses who have historically been involved and who have the capability to be economically efficient. Government should withdraw from the collection function and should stay out.

#### FLOW CONTROL

Part IV of the draft plan discusses flow control (pages 118-126) and ultimately recommends it (pages 183-184). Flow control is required in order to make the transfer station viable. On one hand, the plan recommends the transfer station with material recovery in order to meet a perceived, yet nonexistent, problem. On the other hand, the plan recommends that the municipalities implement flow control in order to bring Champaign County's solid waste back into the county, 80% of which is currently going into landfills in other counties. The irony of the situation is obvious. The effect is to immediately raise residents' costs for disposing of garbage which will continue to go to the same out-of-county landfill for the foreseeable future.



It appears that the enactment of a flow control ordinance in Champaign County or the cities of Champaign and Urbana would be unique in the State of Illinois. The counties and the cities can expect, then, that any flow control ordinance will serve as a lightning rod, attracting various interested groups, businesses, and persons throughout the state of Illinois to any legal challenge. Ultimately, this county will serve as the battleground for the legitimacy of flow control ordinances in the State of Illinois.

#### YARD WASTE

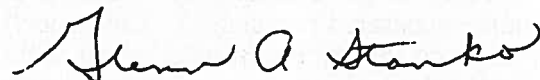
The plan reflects a general aversion to allowing the private sector to handle yard waste, and therefore recommends expansion of governmental yard waste collection programs. However, yard waste has been collected by private haulers for years. The only difference now is that the yard waste must be separate from the solid waste. The plan should recognize the contribution of the private sector in this area and should discourage any governmental involvement in yard waste collection.

#### CONCLUSION

As is apparent from the above comments, the Champaign County Draft Solid Waste Management Plan is fundamentally unsound. Not only is there cause for concern on the part of the many small sanitary hauling businesses, but the consuming public is negatively impacted as well. This plan is a voluminous collection of antiquated data and misleading calculations and ultimately foreshadows governmental control of private businesses. The plan reflects no concern for what is best for the consumers of Champaign County who, in the end, will have to pay the costs of its recommendations. This plan should not be adopted in its present form.

Very truly yours,

RENO, O'BYRNE & KEPLEY, P.C.

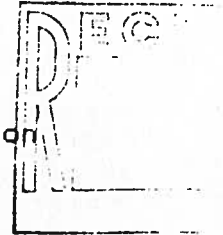


Glenn A. Stanko

GAS/slp

cc: Champaign County Board members  
City of Champaign Council members  
City of Urbana Council members  
Dan McCollum  
Jeffrey Markland  
Steve Carter  
James Grassman  
Peter J. Herlofsky, Jr.  
Tom Schuh  
James S. Darling

Mr. James Pendowski  
Intergovernmental Solid Waste Disposal Association  
209 W. Clark St.  
Champaign, Illinois 61849



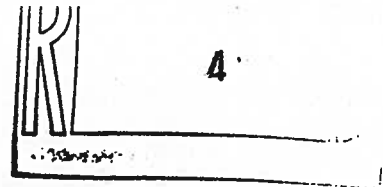
Mr. Pendowski:

As you are aware, I have stated most of my concerns with the solid waste plan at past ISWDA and County Board meetings. However, I would like to stress one more time how strongly I feel that the ISWDA proceed in a manner that will benefit the citizens of Champaign County as well as set a standard for the rest of the State to follow. During the last six months, it has become very apparent to me when listening to various groups of people from different parts of our county talk about what they would like to see Champaign County do about the waste problem that they do not want to settle for a token recycling effort and dumping the remainder of the garbage in a hole in good, productive earth. It must be obvious to you that people feel the need to stop destroying land and polluting streams and wells. You have the power and the ability to turn this waste plan into something really beneficial and progressive for the community if you so desire. The ISWDA looks to you for their leadership and guidance, and the rest of the County looks to you for compassionate concern about the welfare of its citizens and the preservation of its environment.

It seems to me that the first goal in the solid waste plan should be to recycle out of the waste stream as many reusable resources as possible. This could be accomplished by some mandatory recycling efforts enforced by the County and also by an efficient, well-run transfer station. Until these two goals are set in motion, this county really doesn't have much of a chance to be successful in waste management. People aren't going to go much farther than they are now in voluntary recycling efforts. They must be pushed to do what is in their own best interest. I realize that puts some pressure on County and City officials when they tell people that they must do something, but in this particular situation I think the citizens of Champaign County want to the right thing. It's like telling people where they can and can't smoke cigarettes. The smokers feel their rights are being abused, but they have to do it anyway, and most of them really do understand that it's a positive step taken to protect human health. Mandatory recycling is a positive step toward preserving our environment for those who follow us. We don't have the time to wait for our State or the nation to set down these laws. Cities and counties have the right to pass ordinances and are doing so everyday. Champaign County doesn't have to sit around on its hands. Now is the perfect time for these kind of mandatory measures to be put into practice. You are developing a waste plan. Fifteen thousand plus people in

your county are saying they are ready to help eliminate needless amounts of trash going into the waste stream. Positive goals need to come out of your plan. Garbage bills are already rising because of fuel prices, and we know that they will continue to rise because of the transfer station. When people realize that by having to recycle they are saving themselves some money while at the same time doing the right thing for the environment, then you've got them on your side. Less garbage to be picked up means less of a garbage bill. The mandatory requirement "pill" isn't so hard to swallow if it can benefit your pocketbook as well as saving natural resources.

In talking to you on the subject of solid waste management, and knowing that you attend and speak at solid waste meetings and conventions, I realize that you are not living in the dark ages when it comes to garbage. You are well aware of the State's position on regional waste control plans as being in favor of multi-county facilities. With every county running out of landfill space, not to mention what this type of garbage disposal is doing to clean water supplies, the State and the national EPA feels that the progressive method of waste control can be best achieved through multi-county ventures. If there is a nearby county or counties who can work with Champaign County and find a place or places to utilize the energy which a regional incinerator would generate, this would seem to be the best, most economical, and safest option for the people of this county. Champaign County could still retain its transfer station as a means of revenue and find a more appropriate place for a landfill in an area where there is more marginal ground available. You would have time to get your transfer station operating while working with the other counties as they get their waste plans coordinated with yours. If the decision was made to place an incinerator in Champaign County, remember that could mean extra money for the county, and IP would have to buy the energy. As I understand it, IP will need power by 1995, so even if they would protest an incinerator, they could really use it. Besides, why should they object to buying it at the reduced rate they are required to pay? As for the environmentalists who complain about the emissions, it is a fact that emissions from cars and trucks create more of a problem than the emissions from these kinds of smokestacks. You know that your landfill will leak and that it will pollute drinking water and streams. Because of the Clean Air Act, the EPA will monitor air emissions and make sure any problems are corrected before they can do serious damage to human health. Which method of dealing with garbage seems cleaner, safer, and more environmentally sound to you? Is Champaign County and the ISWDA going to move progressively ahead and spend its money with an eye to the future, or waste its money living in the past as far as dealing with garbage is concerned? We all know that anyone can offer large amounts of money and



January 14, 1991

N. Millar  
R. R. 2  
Urbana, Il. 61801

ISWDA  
209 W. Clark  
Champaign, Il. 61820

In response to the proposed plan for recycling, I would like to say the following:

1. I do not know why there is so much concern about YARD WASTE filling up the landfills. I'm sure that if people were given a choice of having a yard waste landfill next to them or a general dump of smelly diapers, unused pesticides, and everything else, they would choose the yard waste. Granted it takes up a lot of space, but it is the least innocuous of all the wastes. It is organic and will deteriorate at a good rate, unlike much of our other wastes. Moreover, gardeners would use the composted mulch. The wood could also be used by people with woodburning stoves. My proposal is to let people dump good clean yard waste free of charge and also let citizens reclaim it free of charge. This would enable recycling to take place, and thus reduce the amount piling up in the landfills. Yes, there would be a cost to maning the landfill, but it is worth it. We are already planning to spend millions on a materials recovery station, and it is necessary. It simply costs money to recycle, but it is necessary to save our earth and our people.
2. If you were to charge for dumping something, I would think it would be for undegradeable types of materials such as plastics, and poisonous chemicals. Charging for dumping such noxious materials might discourage consumers from purchasing so much of them.
3. Consumers must have a part in recycling. They have to be taught what materials are environmentally friendly.
4. A material recovery facility should not be one that simply allows consumers to discard all their waste into one bag and expect the people at the recovery facility to sort it all out. I would not like to sort out such a "mixed bag" and I would not expect anyone else to do it either. Much cleaner products can be recovered if consumers were required to presort their garbage and mark their bags accordingly, and include their names and addresses. These bags could be

get someone to sell their land for a dump, and that the land can be made to appear suitable for such a landfill. However, it takes a person with knowledge, compassion, environmental integrity, and good judgment to seek the right way to approach this dilemma, not a person just willing to settle for the easiest way out. Because when all is said and done, a manager in your position will likely move on when this job is completed, leaving the results of your actions for these county citizens to deal with the rest of their lives and their childrens' lives. Time should be taken to thoroughly explore every option now available as to what should be done with the garbage once it has left the transfer station. I have seen no evidence that anyone in Champaign County is anxious to start a new landfill at this time. They seem to be satisfied with the garbage disposal as it is now. We have time to do the best for ourselves, not just settle for mediocre at the expense of those that will follow us. You are the leader of this expedition. Please don't lead the citizens of Champaign County down the road to disaster.

Finally, it seems to me if the ISWDA and yourself are truly committed to the best solid waste plan for Champaign County then two of your three proposed steps in that plan are in reverse order. According to the plan, we have a transfer station, then a landfill, and finally composting. Shouldn't composting come ahead of a landfill if we are dedicated to keeping out as much trash as we can? It is the logical next step after a transfer station. You would recycle at the station, and then compost what garbage you could at the station site. Therefore, you would have less garbage to haul and less to put in a landfill. If you did this, along with some mandatory recycling efforts, perhaps you really could reduce the volume to an acceptable level.

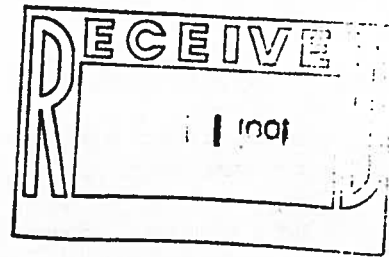
Please take time to consider all your options. You are aware that the people in Champaign County aren't pushing you into an instant solution. We want a good solution. We want a safer solution. You have a very difficult job, but you also have many learned people in this community who could provide you with valuable information. Please take the time to look at progressive means of handling waste. There are more and more viable options springing up around the country everyday out of the necessity to dispose of garbage. Please don't settle for the old, destructive ways. Thanks for listening to me once again. I know I say alot on the subject, but my life and my children's lives depend on the outcome.

Sincerely,

*Connie Messman*

January 8, 1991

ISWDA  
209 W. Clark  
Champaign, IL 61820



Dear Members of the ISWDA,

I would like to comment on the Draft Champaign County Solid Waste Plan you have generated. Judging from the draft plan's length, a lot of work went into it. I'm glad we're getting a plan, and I'm also pleased that you are allowing for public input.

In your draft plan, the value of source reduction of waste over other aspects of the state's waste disposal hierarchy was recognized. I was pleased to see that, but was disappointed that there were few actual recommendations as to how to attain higher levels of source reduction and recycling. We need some solid goals and deadlines to work towards if we are going to call this draft a "plan." I would suggest implementation of a bottle bill, packaging tax, or other incentives for manufacturers and citizens to produce less waste period.

In addition to implementing a system that encourages waste reduction at the source, we need to maintain the strong recycling program we currently have in place. I'd like to see the plan amended to include expanded provisions for recycling. We should be offering curbside collection of recyclables to the C-U city fringes and to selected communities in the county.

From my experiences with colleagues at work, the interest in recycling is alive and strong. Once people see how easy it is to recycle, they eagerly and willingly participate. That's why curbside programs are so important: they make participation easy and they also keep the issue in people's attention.

In addition, source separation of recyclables needs to remain a strong component of our system. Relying on mixed waste processing (where recyclables have to be pulled directly from the garbage stream) will yield fewer recyclables (due to contamination) and also prevents the average citizen from being aware of the need to reduce the amount of waste produced.

Though I'm not a scientist, I feel that you've been very thorough in your criteria for selecting a landfill. I feel strongly that we need a landfill in the county so that we'll be responsible for our own waste.

Incineration, on the other hand, is not a viable alternative to landfilling. The concentrated toxins produced by incineration must be dealt with in an acceptable manner, and that means expensive state-of-the-art scrubbers and other safety precautions. Besides, incinerators require volume in order to function efficiently. Our goal is to reduce the amount of garbage we produce, not to keep shoveling trash at an incinerator just so that we can keep it burning.

-over-

spot checked, and consumers them instructed as to incorrect procedures.

5. Unused chemicals, herbicides, pesticides, should be returned to a certain station. Purchase of these items should be controlled by the government by limiting the amount a customer could buy. These should be sold in small amounts only to discourage over-purchase by the consumer.

6. Manufacturers need to be more environment-conscious. Only items which are deemed "necessary" should be allowed to be manufactured from environmentally hazardous materials. Our government needs to put tighter controls on what is manufactured and sold in our country.

7. Landfills should not be located in prime agricultural areas. Only yard waste landfills are acceptable in these areas.

In summary, what we can do on the local level:

- ALLOW CLEAN YARD WASTE TO BE DUMPED AND RECLAIMED FREE
- CHARE MORE FOR DUMPING OF HAZARDOUS AND NON-DEGRADEABLE MATERIALS
- EDUCATE CONSUMERS ABOUT PURCHASING ENVIRONMENT-FRIENDLY PRODUCTS, AND GARBAGE REDUCTION PLANS
- MAKE CONSUMERS PRESORT THEIR GARBAGE
- GET RID OF XL CORP. AS A MATERIAL RECOVERY FACILITY. AS I UNDERSTAND IT, THEY ARE WAY OVER THEIR ORIGINAL BID, AND EVEN IF THEY WERE THE LOWER BIDDER, I WOULD NOT HAVE CHOSEN THEM AS THEIR METHODS ARE UNACCEPTABLE. THE SUPPOSED INITIAL BENEFIT OF A LOWER COSTING FACILITY HAS BEEN ELIMINATED, AND THEIR 'MIXED BAG' PHILOSOPHY IS NOT ACCEPTABLE.

*Sincerely,*

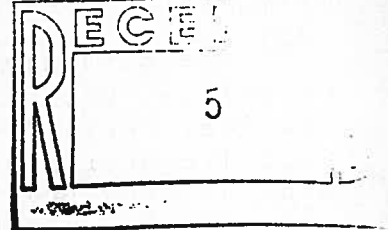
*M. J. Miller*



CHAMPAIGN COUNTY SOIL & WATER CONSERVATION DISTRICT  
1808D Round Barn Road  
Champaign, IL 61821  
Phone: (217) 398-5212

January 10, 1991

Intergovernmental Solid Waste Disposal Association  
209 West Clark Street  
Champaign, IL 61820



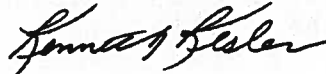
Dear Sirs:

The Champaign County Soil and Water Conservation District is charged with safe-guarding the soil and water of the county. Part of our responsibility is to assure that these resources are used in ways that are beneficial now -- as well as in the future. Soil and water are renewable resources but it takes a very long to time to accomplish that. Once damaged, the repairs may take so long that our great-great-grandchildren will not live to see them completed.

We are concerned that the proposed landfill sites may be on soils that are designated as Prime Farmland by the United States Department of Agriculture. Prime farmland is of major importance in providing the Nation's short- and long-range needs for food and fiber. It produces the highest yields with minimum inputs of energy and economic resources. Farming it results in the least damage to the environment. We feel the wisest and best use of Prime Farmland is agriculture. A recent trend in land use in some parts of the county has been the loss of prime farmland to industrial and urban uses. The loss of Prime Farmland to other uses puts pressure on marginal lands, which generally are more erodible, droughty and less productive and farmable.

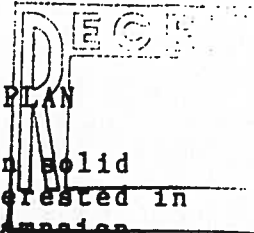
The District feels the protection of Prime Farmland is important to the future of the county. We urge you not to locate the proposed landfill on Prime Farmland.

Thank you for your consideration.

  
Kenneth Kesler  
Board Chairman

League of Women Voters of Champaign County

COMMENTS ON THE CHAMPAIGN COUNTY DRAFT SOLID WASTE PLAN



The League of Women Voters has been actively involved in solid waste management issues for many years. We are vitally interested in seeing a progressive solid waste plan be implemented in Champaign County. There are some excellent recommendations in the ISWDA's draft solid waste plan. However, there are several aspects in the plan which need to be addressed.

The plan must include specific recommendations for increased recycling, waste reduction and source separation. The plan should consider recycling not only as a means of waste disposal, but as a positive source of income to offset other disposal expenses. This depends upon providing an increasing source of high quality recyclables, which means that waste must be separated at the source.

The plan should define specific percentage goals for reducing waste, for recycling and for composting, based on the type and the source, and it should project dates for achieving these levels. The 24% state-required recycling goals should be viewed as a minimum goal. The plan's proposed 43% recycling rate for 1992 remains constant through 2010. However, with expanded source separation and improvements in processing technology, as well as with expanding markets, ISWDA's plan could increase the recycling rate to 60% by the year 2000. Several major U.S. cities, such as Seattle, are setting recycling goals considerably higher than the present ISWDA plan.

The plan must contain explicit language describing incentives and disincentives to haulers and waste producers for collection of glass, aluminum, cans and high grade paper from household units, apartment dwellers and commercial establishments. These incentives could include user fees, taxes, tax credits or exemptions. Encouraging EVERYONE to take part in recycling efforts will save vital landfill space and promote increased environmental awareness.

To achieve a maximally effective recycling and source separation program, the plan should provide adequate funding to independent agencies that will continue and expand the community's present educational programs. The focus of the educational efforts should be 3-fold: (1) to inform the public of the need to reduce the waste stream; (2) show how the plan proposes to reduce the waste stream; and (3) to explain how citizens can contribute to this effort.

The plan should be updated periodically based on current data for waste generation. There should be a well-developed mechanism to continue to monitor the county's waste stream, including components as well as volume. There should be regular reports to the public and an independent entity should make a thorough review of the plan in 1996.

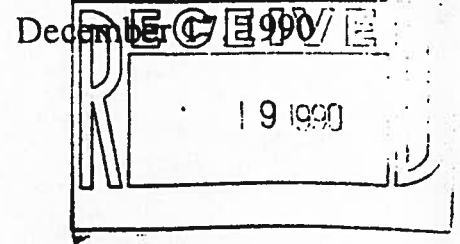
Champaign-Urbana was recognized nation-wide in August by the National Recycling Coalition for its outstanding recycling programs. There is tremendous momentum and support in the community for recycling. With a good solid waste plan, we have an opportunity now to build on this excellent foundation.

Respectfully submitted,

*Deborah C. Rugg*  
Deborah C. Rugg, President  
League of Women Voters of Champaign County

Charles V. Welsh  
717 South Elm Street  
Champaign, IL 61820

Intergovernmental Solid Waste Disposal Association  
209 West Clark Street  
Champaign, Illinois 61820



Dear Sir or Ma'am,

I've read the notice you published in the News Gazette on 04 DEC 90 describing the highlights of the Champaign County Solid Waste Management Plan. I'm writing to express my concern that this long range plan does not yet go far enough. I believe that 20 years from now, our concept of "waste" will not be the same as now, and that our waste management plan must reflect this.

In the last 10 years, Champaign-Urbana has come from recycling next to nothing to recycling about 25% of its waste stream. By the end of the next 20 years, our goal should be to eliminate the concept of "waste stream". Rather I would encourage you to put forth a plan which sets goals to specify a time frame by which all waste stream components will be recycled or eliminated. For example one such time frame might be:

1. 50% waste stream recycled by 1997
2. 75% waste stream recycled by 2005
3. 100% waste stream recycled by 2010

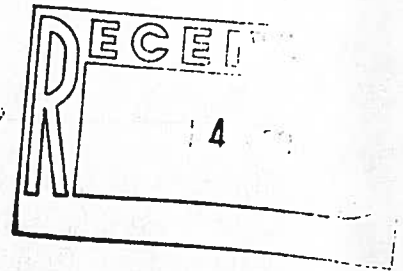
I understand that there will be monumental problems to solve to achieve these goals. Let us look at these as opportunities, not limitations! Our current method of storing waste in landfills is neither economically nor ecologically sustainable. The loss of resources which are buried in landfills, the inevitable pollution resulting from burying waste, the cost of operating landfills, and the overwhelming public opposition to new landfills all tell us that the day of the landfill is nearly at end. Will our twenty year plan be blind to this?

We must not put a plan in place which indefinitely relies on landfills, regardless of how sanitary or state-of-the-art they may be. Twenty years is enough time to do figure out how to put our trash to work for us rather than burying it under ground.

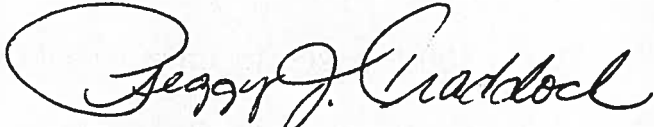
Sincerely,

Charles V. Welsh

Dec. 12, 1990  
Rt. 1, Box 38  
Homer, Il. 61849



I am opposed to the solid waste management plan for Champaign County that was presented by the ISWDA. I have spoken with Edward Bondowski and to Mr. Jerry Lyke in separate conversations suggesting that Champaign County should make a genuine effort with other central Illinois counties to form a regional solid waste plan. A multi-county plan would be more economical for the taxpayers, and could mean a more technologically safe way to dispose of trash. At this suggestion the reply given from both conversations was that no other counties in the area were interested in a regional plan. I question the sincerity of the ISWDA's research of this option, as the Dec. 3, 1990 edition of the Champaign-Urbana News-Gazette stated that five counties, three of which border Champaign County, announced the formation of the Central Illinois Municipal Joint Action Agency. A multi-county agency recently formed to study and formulate a regional solid waste plan. I feel the people, and most of all the taxpayers of Champaign County, deserve a concerted effort from the ISWDA to cooperate with other counties to develop a multi-county solid waste plan.

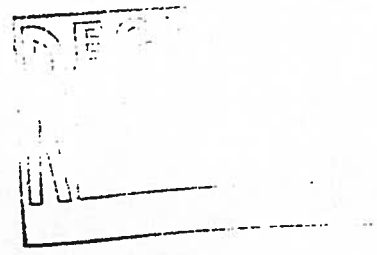
  
Peggy J. Craddock

# CITIZENS FOR WASTE SOLUTIONS

1208 West Union Street  
Champaign, Illinois 61821 217 352-5331

January 10, 1991

Mr. Jerry Lyke  
Intergovernmental Solid Waste  
Disposal Association  
209 W. Clark  
Champaign, IL 61820



Dear Mr. Lyke:

At the ISWDA public hearing on December 5, various members of Citizens for Waste Solutions presented to you and the other ISWDA members a plan to address Champaign County's solid waste problem. The CWS Plan, formulated over several months, culminated a great deal of volunteer effort by dozens of county residents, many of whom have extensive professional experience in the solid waste, environmental, and natural resources fields.

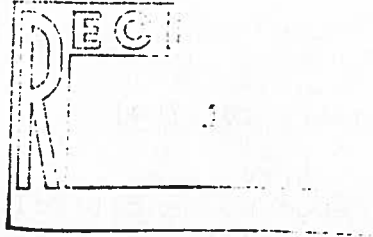
In sending this letter we would like to ask the Association to respond to the CWS Plan. We are hopeful that you will find the Plan a sound one that you can incorporate in full into your long-range plans for the County. If there are parts of the CWS Plan with which you disagree, we would like you to identify the parts and explain the grounds of your disagreement. We would ask, in particular, that you provide your views in some detail on quantity-based pricing schemes ("pay-as-you-throw") and phased-in bans on throwing away recyclables. These two ideas, the core of the CWS Plan, have worked well in other communities.

You and your staff, of course, face a very heavy work schedule these days. Yet we hope that you perceive the CWS Plan as a rather special type of public comment, something more than just ideas tossed out at a hearing by a few local residents. The CWS Plan has gained considerable visibility in the County, and we believe it would advance our community's efforts to deal with the solid waste issue if you would take the time to set forth your areas of agreement and disagreement with this Plan. We ask for this information in part because the Plan is backed by a large quantity of information supporting its various components. In the case of parts of the Plan with which you might not now agree, we would like the chance to provide to you the underlying data and other evidence that, we believe, fully supports the wisdom of the Plan for Champaign County.

Sincerely yours,

The CWS Steering Committee

*Eric T. Freyfose*  
*Lee Clebel*  
*David Main*  
*Bruce Hannon*  
*Kim Majews*



Mr. Jerry Lyke, Chairman  
209 W. Clark Street  
Champaign, 61820

Dear Jerry,

The Champaign County Solid Waste Management Plan is obviously a comprehensive and exhaustive study. The Intergovernmental Solid Waste Disposal Association Board, Mr. Pendowski and his staff are deserving of praise for their persistence and thoroughness in this undertaking.

However, the omission of explanations and precedents (or even a bibliography) of how criteria utilized by the ISWDA came into being is a very serious and valid concern. This report addresses solid waste disposal pertinent to everyone in Champaign County, yet it was made available on a very limited and restricted basis. It should have gone to every library and information service in county including the Lincoln Trail System, not just eight libraries, only four of which were not in Champaign-Urbana. You see most people would not have been able to afford the \$200 over-the-counter price for taxpayers! In that we have already paid for the report once, this astronomical price only served to taint the document.

The permanent destruction of prime farming ground and eventual contamination of ground water resources seem to have received cavalier consideration. Is that really what we want to do? Your planners suffer from myopia if they really feel Champaign-Urbana needs can be divorced from those of the surrounding county, state and nation.

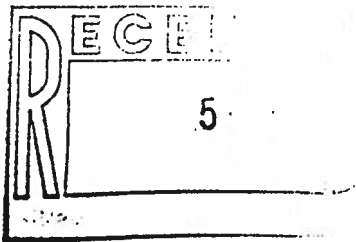
IF the Disposal Site is to be located in southeast Champaign County, the impact to that area MUST be addressed. The affected villages, schools, drainage districts and townships should receive ongoing compensation proportional to the site usage.

Thank you for your consideration, yours truly,

Roger Kirkwood

R R 3 Box 3

Mahomet, 61853



Victor S. Wojnar, M.D.  
301 E. University Ave.  
Champaign, IL 61820  
January 14, 1991

Intergovernmental Solid Waste Disposal  
Association  
209 W. Clark St.  
Champaign, IL 61820

After more than 100 years of productive farming, since the Pioneer settlers cleared, drained and began cultivating America's finest topsoil, the farmland of S.E. Champaign County still as productive as ever, has been chosen for garbage dumping (landfilling) by local (predominantly urban) government. Farmland will no longer be used for farming, but for garbage dumping, if the government which is charged with protecting it, in return for taxing it over the years, fulfills its published intentions and threats under the guise of preferred landfill siting.

A garbage dump (landfill) starting with 200 to 300 acres will destroy the selected farm as well as taking it out of production forever. The surrounding 3000 acres will have its operations disrupted, interfered with, depreciated and otherwise harassed to a none or poorly productive state. If every county in the U.S.A. (3049 counties listed in the World Book) took out of production even 100 acres (hoping that the surrounding "buffer zone" will remain productive), then 10,000 acres of Illinois farm land and 300,000 acres of prime USA land would be destroyed for farming, and probably far more in reality. Therefore, it would seem more realistic to seek out marginal, already destroyed, unproductive or unattractive land in a multi-county venture, and site this area for "landfilling."

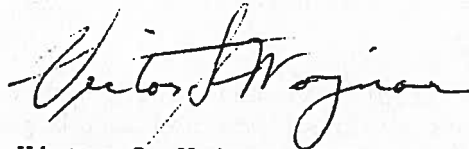
Waste reduction, separation, recycling, incineration (combustion for energy cogeneration where possible), composting, and finally burying the residual ash (after final treatment if necessary) in a landfill - this sequence would seem more reasonable, sensible, sanitary, healthful and politically acceptable than the ISWDA present plan of burying essentially "raw garbage." For this we don't need prime farmland.

We will need, over time, all the arable land we have to prevent starvation and malnutrition in an exponentially growing human population.

I and many other citizens and families of this County plead for reconsideration and revision of the ISWDA plan. We can and must support local waste reduction, multi-county specialization and joint venturing



(to spread costs, manpower, risks and space) in separation, recycling, incineration, landfilling and other necessary factorization or facility construction; and, for Hi-Technology application to control the prompt decomposition of garbage and avoid "highway robbery" of our farmland resources and thus endangering our future.

A handwritten signature in cursive script, appearing to read "Victor S. Wojnar". The signature is written in dark ink and is positioned above the printed name.

Victor S. Wojnar, M.D.

I see nothing wrong in mandatory recycling. We do that now, one <sup>can</sup> for glass, one for cardboard and one for metal & aluminum cans.

~~How~~ Who is going to repair the torn up roads from the heavy trucks on the road? And what about the ~~paper~~ that gets blown about etc. I think Incineration would seem to be a far more desirable thing to do. It will soon pay for itself

Sincerely

Joseph Mitderfer


404 Wilson

Villa Grove, Ill 6/19/56

Property owner

1-3-91

ISWDA Board -

I am a ~~landowner~~  next to the proposed landfill site 22-B.

I think this is awful to propose a landfill on good productive land. If you must have one why not go to poorer ground or a multi-county landfill near Champaign where most of the garbage is produced.

Who is going to pay the landowners around this site for the devaluation of this prime farm land?

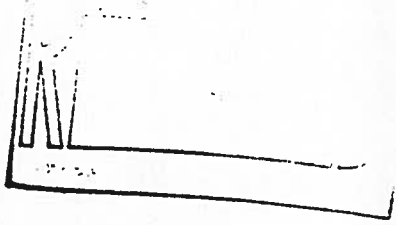
Are you going to pay for piping water to drink on the family farm?

All landfills will leak and what does that do to our ~~wells~~ <sup>water</sup> that we drink?

There is no such thing as a safe landfill.

To

Intergovernmental Solid Waste Disposal  
Association of Champaign County.



In light of the past weekend between Christmas and New Year's, the flood waters at Villa Grove should give rise to great concern of you siting a landfill near Bongard. That area was flooded with many inches of water covering many acres. That water drains into the Embarrass River which goes thru Villa Grove, flooding over one third of the town this time. Are you going to be responsible for the contaminated water that backs into many of the basements and surrounds their homes and yards? Also this same water flows down the river to the lake at Charleston, which gets all its drinking water and other water needs from it, It also supplies the Eastern Ill. school Campuses. The contaminated water flows on to some more towns like Newton which gets all its water from the Embarrass River. Are you going to make our County or even you personally be responsible for diseases and sickness that surround this surface drainage, let alone contaminate all the surrounding wells of families that have homes surrounding this ~~site~~ # 22 and

(2)

or near Bongard area. Are you providing them with water piped from the northern Ill. Water Corporation for their needs free of charge?

I think the cities of Champaign and Urbana have a first priority of taking care of dumping their runoff water into the Embury River at the South-east edge of their boundaries. You will have to build large retention ponds to hold that water. These could be used for recreation purposes and other water uses. You may say this is contaminated water; but you say you can clean it up. Then clean it up and use this water for Champaign and Urbana thereby reducing the flooding at Villa Grove and the back up water which will spread clear over to the Bongard landfill site. This ground is very flat in this area. Our very fertile prime farm does not need to be turned into a swamp again. What will that do to the tax base of the county?

If that landfill near Bongard is sited can you envision what that nearby acreage will look like when it is flooded, garbage of all sorts floating around. Who will be ~~any~~ responsible for cleaning up the garbage?

(3)

in the fields? It sure isn't the farmer's garbage. How will garbage trucks be able to get to the landfill site with the roads flooded, and what about the hole? Will it fill up with water too. What are you going to do about the drainage tiles that will be broken?

What about the devaluation of our prime farm land? This is our life's investment and future life earnings and income. Who is going to make up the difference from the going rate of land prices and what my ground will bring if and when we have to sell it.

Is Champaign County going to reimburse Heritage school district for lost taxes, which will be for a long time or even forever. Can you afford that?

Why do we need so much acreage? Champaign County does not need to supply others on the Chicago area with a dumping ground. Or do you think this is a way to get tipping fees to repay your loans.

We need to recycle all the recyclable garbage before it is smashed together in garbage trucks. We don't need the XL Sorting building.

No one will buy any garbage to recycle that come out of that building. It will all be contaminated. Why unload & reload the same garbage. That

Doesn't make any sense. Garbage haulers won't go for this either.

We need to have mandatory recycling laws for everyone in our County especially for Champaign, Urbana & U. of Ill. Campus area as that is where most of the garbage comes from. We need to spend money on collection of recycling garbage and then have incinerators to burn the burnable garbage thereby reducing the greater part of the garbage. Then there is no need for the large acreage to be just sitting there for years.

I am also concerned with the large amount of truck traffic and farm machinery that moves down these roads. You know, that farmers have a right to move their machinery down the road from one field to another!

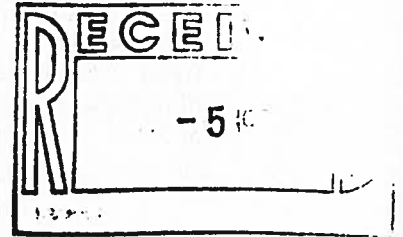
These are some of my concerns as a resident in the south east section of the county and also as a land owner near the Bongard site.

Yours truly

Bernadine Spangol



## Questions Regarding the Champaign County, Illinois Solid Waste Management Plan & Landfill Siting Study



1. For the Champaign landfill location, why was the area located between and north of Champaign and Mahomet, shown to be a desirable landfill location in the ISWDA's Landfill Site Identification Report (hereafter referred to as The Report) using the ISWDA's own criteria, since it is not located over a regional aquifer as defined by the ISWDA criteria 1 & 2 and shown in Figure 6 of The Report and since it is almost directly between the two municipal areas where 75% of the county's waste is generated?

2. Why did the ISWDA adopt non-standard criteria for the site selection?

<u>STANDARD CRITERIA</u>	<u>ISWDA CRITERIA</u>
Closeness to Urban Areas	Exclude Areas near Incorporated Municipalities
Closeness to Paved Roads	Paved Roads Not a Consideration
Soils of Low Permeability	No Usage of County Soils Map
Ground water Not Close to Surface	No Consideration of Ground water Depth
Low Slope	No Consideration of Slope

3. On what professional planning source is the criteria based? Please explicitly state text name as a bibliographic citation and supply copies of the specific pages referenced. (Public input is not considered to be professionally generated criteria. In addition, similar studies done at other locations across the State are likely to have the same political influences, and thus are not to be considered professionally generated criteria.) Thus, please do explicitly state text name as a bibliographic citation and supply copies of the specific pages referenced.

4. The **INCLUSIONARY** criteria appear to be developed based on input of urban representatives after the last controversial siting study was rejected. These criteria appear to be developed without public input from those rural areas that would be affected by the siting. Therefore, when developing the criteria, what public input from members of the rural population was incorporated? Please state criteria and the names of the rural individuals whose input was accepted so that your "public input" can be proved to be truly representative of the county rather than just "urban input" as the criteria now seem to be.

5. On what basis does the ISWDA support the criteria chosen when essentially the opposite criteria were adopted in the last site location study which resulted in the choice of Site B done about three years ago? Please list each of the criteria in each study (26 exist in the current Report) next to the comparable criteria from the previous study and explain the rationale for the change using the following format:

CONCERN	SITE B CRITERIA	CURRENT REPORT CRITERIA	EXPLANATION
1. Nearness to Waste Generating Populations	Closer is desirable	At least 1 1/2 mile away is required	[Please cite any State of Federal Laws or Regulations which required this change]
2. ...			
3. ...			
26. ...			

6. The ISWDA went to a great deal of effort to generate highly unreliable maps from well borings when a more reliable data source was easily available. Why did the ISWDA Report not use the Champaign County USDA Soils Series map as an input to the analysis since:

- a. It is a nationally recognized standard data type regularly used in landfill siting studies.
- b. It was available in digital form from the same source that the ISWDA received its other data types.
- c. It provides a continuous surface for basing landfill siting decisions upon rather than the highly discontinuous and extrapolated (i.e. assumed) data gathered from well borings?

7. Illinois State Geological Survey Circular 532 "Potential for Contamination of Shallow Aquifers in Illinois" (1984) which was done at nearly the same scale as the ISWDA Site Report (i.e. about 1:62500) shows that those areas which are dangerous for siting landfills are those which the ISWDA Report shows are best for siting landfills. (Please refer to the accompanying maps from each publication on the following page.) How can the ISWDA justify the fact that they are getting results which are opposite those of the State of Illinois?

8. It appears the ISWDA is willing to locate the landfill in an area which is **EXTREMELY LIKELY** to **CONTAMINATE SHALLOW WATER WELLS** in order to avoid the **LOW POSSIBILITY** of contaminating a **DEEP WATER** resource. What is the relative percentage likelihood of contaminating the shallow water wells in South East Champaign County compared with contaminating the deep aquifers of the area near Champaign/Urbana/Mahomet?

9. If the proposed landfill in Southeast Champaign County is safe and will not contaminate the shallow ground water aquifer located there, (reference the preceding question) then that same landfill would be safe in the areas near Champaign/Urbana/Mahomet also. Therefore, why not locate it near Champaign/Urbana/Mahomet and save the tax payers the expense of additional hauling to a more distant location?

10. If the criteria for the landfill is based on many natural patterns (e.g. location of aquifers, streams, woodlands, wetlands, etc.), why is the scope of the report limited to Champaign County? Since the ISWDA report suggests that a particular outer edge of the county is most suitable, why was the study not extended in the obvious direction beyond the arbitrary political edge to find a more suitable location? Since Champaign County currently uses a landfill just over the border of the county in adjacent Douglas County, a site evidently already adequate, why was that section of Douglas County not considered either originally or now as the obvious potential location for the Champaign County landfill?

11. Since an EPA Report to Congress (Solid Waste Disposal in the U.S., Volume 1, 1988) makes it clear that more recently established landfills (since 1980) are implemented and operated no differently than those established in the period 1930 to 1980, what assurances are there that this landfill will be different? What new technologies will be used to set this landfill apart from those which use the technologies of the 1930's (i.e. clay liners) or those of the 1980's (i.e. synthetic liners), all of which leak?

12. Predictions of speed of contamination of ground waters are usually incorrect due to the fact that the predictive models assume the subsurface materials are homogeneous within a type (i.e. a clay stratum). In fact, the movement of contaminated liquids in a leaking landfill run along "fissures" or "faults" in the soil matrix, similar to the fissures and faults found in rocky materials. Well borings do not indicate how "fissured" the soils materials are. Therefore, 1) Why was this critical consideration not incorporated into the ISWDA Report? 2) Is this critical consideration incorporated in the site investigations? 3) If not, why not? 4) What criteria does the ISWDA have in dealing with this question (please explicitly list criteria)? 5) How will the ISWDA investigate the question of speed of contamination due to potential fissures in the soil materials at a particular site?

13. Since the landfill will decrease the property values of that real estate in the surrounding several miles (as this is effective condemnation of private property by eminent domain), will the County monetarily reimburse these affected property owners? If not, why not?

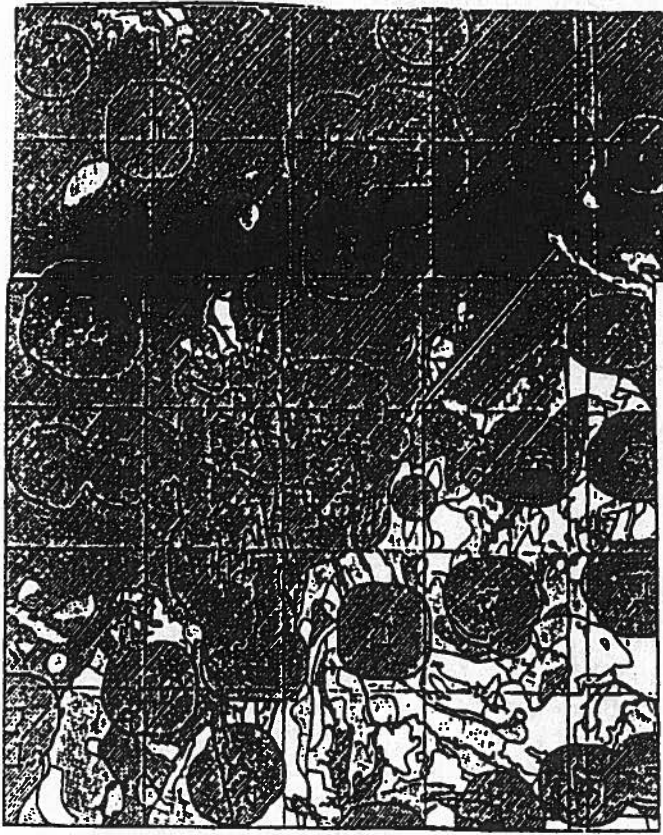
14. If Champaign/Urbana is willing to locate development, particularly industrial development which uses highly toxic and polluting chemicals (e.g. Humko Kraft, A. Edwards, etc. using such chemicals as oils, kerosene, PCBs in generators, etc.) where chemical spills can occur over the Mahomet Taeyes Aquifer, why not also locate the landfill there? Will the ISWDA recommend a prohibition to future industrial development over the Mahomet Taeyes Aquifer to ensure its protection against toxic chemicals? If not, does this not open the way to contamination of the regional aquifer by more dangerous pollution than just landfill generated household waste? If so, then what is the point of locating the landfill away from the regional aquifer when it is in danger of pollution from an even more toxic source? Does this not mean that the ISWDA criteria relating to the Mahomet Taeyes Aquifer is immaterial to the landfill siting question and ineffective in terms of the Aquifer's protection?

15. Upon what legal or regulatory basis did the ISWDA adopt the "Exclude all areas within 1 1/2 miles of municipal corporate limits...."? Since both the current Urbana landfill and the formerly proposed Site B landfill site are within this distance, is this criteria not arbitrary? Why not? Since it is these excluded areas which produce the vast majority of the solid waste, is this not also unfair? In your answer to this question, please explicitly state the amount by volume and percent of solid waste generated within the 1 1/2 mile limit and compare that with the amount generated outside of this limit. [Note: Using your Geographical Information System, GIS, the values of the amounts requested will be simple to generate, as this is the kind of question GISs are designed to analyze.]

16. Why are 200 acres or more preferred when the county proposes only 65 acres are needed. Is there a possibility that the landfill will be expanded into the additional acreage? If not, what are the specific guarantees and agreements which will preclude the expansion of the landfill beyond 65 acres?

17. Regarding the criteria, "Ownership; Three or fewer owners are preferred", what percentage of land holdings of size 200 acres or more and have three or fewer owners are not in agricultural usage? Considering that percentage, does this criteria really simply say, "Keep the landfill out of municipal areas, make sure it is in a rural area." If not why not (please use the percentage in question in your response)? If it does simply say, "Keep the landfill out of municipal areas, make sure it is in a rural area", then did not the ISWDA double weight rural areas to the exclusion of urban areas where the waste problem is generated?

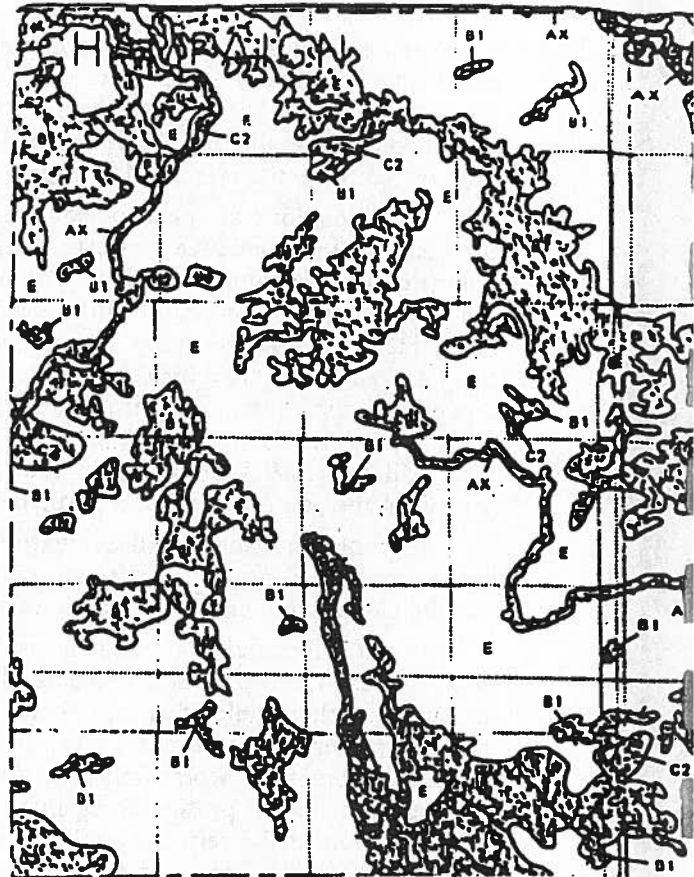
18. Regarding the criteria, "Parcel shape: A regular shape is preferred," what percentage of land holdings of size 200 acres or more and are a regular shape are not in agricultural



FINAL COMPOSITE MAP:  
ALL EXCLUSIONS

ISWDA

ISWDA: "DARK AREAS  
BAD FOR LANDFILL"



POTENTIAL FOR CONTAMINATION  
OF SHALLOW AQUIFERS  
IN ILLINOIS

Illinois Department of Energy and Natural Resources  
STATE GEOLOGICAL SURVEY DIVISION

CIRCULAR 532  
1984

STATE OF ILLINOIS: "DARK  
AREAS BAD FOR LANDFILL"

HOW CAN WE BELIEVE THE ISWDA  
REPORT WHEN THEY COME UP WITH THE  
OPPOSITE RESULTS AS THE STATE GEOLOGISTS?

The ISWDA (left) says the dark areas are no good for a landfill. The State of Illinois (right) says the dark areas are no good for a landfill due to ground water contamination. How did the ISWDA come up with nearly the opposite conclusion as the State Geologists? They did it by using arbitrary criteria. Their Land Fill Site Identification Report should be thrown away and they should be ordered to start over!

# Comments Regarding the Landfill Siting Study Champaign County, Illinois

1. Even if you accept all of the Intergovernmental Solid Waste Disposal Association's (ISWDA) criteria, their own study indicates an acceptable site exists near Champaign (see Final Composite Map: All Exclusions Page 58). This site is between Champaign and Mahomet, that is at the shortest distance from the source of 75% of the county's waste! (from Page number 22, First sentence, 2nd Paragraph). This site is NOT OVER THE MAHOMET VALLEY aquifer, because the exclusion of regional aquifers was one of the criteria used in generating the Final Composite Map (Figure 6). If the ISWDA does not want to locate the landfill as far away from the source of the garbage as possible (that is, out of sight, out of mind) why are they ignoring this absolutely perfect location, found by their own criteria and study?????

2. The location of a landfill is a standard example of how to use GIS technology. There are standard procedures to accomplish this. These include: closeness to urban areas, closeness to paved roads, soils with low permeability, groundwaters not close to the surface. The ISWDA report uses: far-ness from urban areas, paved roads not a consideration, no usage of soils data (they substituted spot data from well borings rather than continuous coverage from the county soils report even though it was already available in computer form), and no consideration of groundwater depth. With a GIS it is easy to adopt the Standard Operating Procedure and then do an even more in-depth analysis using the Standard Operating Procedure as a point of departure. In this report, the Standard Operating Procedure was ignored or the opposite criteria was used.

3. The county site location study results in almost exactly the opposite findings of the State of Illinois. In the Illinois State Geological Survey Circular 532 "Potential for Contamination of Shallow Aquifers in Illinois" (1984), in which the analysis was done at about the same scale (i.e. about 1:62500 scale) as the county wide Landfill Identification Study report (so it is fair to compare the two), almost exactly the opposite findings result. Specifically, Plate 1 shows a similar pattern of areas in Champaign County except that the State study shows those areas considered bad because of high likelihood for contamination are those areas the County finds the best for landfills. Clearly, the County is nearly 180 degrees out of step with the rest of the State of Illinois.

4. The useful life of this Landfill is projected to be in the area of twenty years. No attempt is made to evaluate the useful life of the resource traded away: the agricultural productivity and resulting economic income to the county. After the landfill is closed, it can no longer be used as productive agricultural land. What is the life of agricultural land? It is certainly more than twenty years. The land in the area under consideration has been returning an economic income to the county for about 140 years, and is still considered some of the most fertile land in the world! For the sake of discussion, let us say that this land has an agricultural economic viability of 1000 years (as experience in Europe suggests, this is still much to short). What is the relative value to the county of sterilizing land that could bring in money in order to use the land for only 20 years? That is a trade-off of 50 to 1, where the 50 is income and the 1 represents a cost.

5. An EPA Report to Congress (Solid Waste Disposal in the U.S., Vol. 1, 1988) makes clear that the means of implementation of a landfill since the 1930's has not changed, that they all eventually leak. Considering the lack of standardization associated with the ISWDA's report, isn't it a good idea to call a moratorium on landfills until National Standards can be adopted by congress. That at least would be fair.



usage? Considering that percentage, does this criteria really simply say, "Keep the landfill out of municipal areas, make sure it is in a rural area." If not why not (please use the percentage in question in your response)? If it does simply say, "Keep the landfill out of municipal areas, make sure it is in a rural area", then did not the ISWDA double weight rural areas to the exclusion of urban areas where the waste problem is generated?

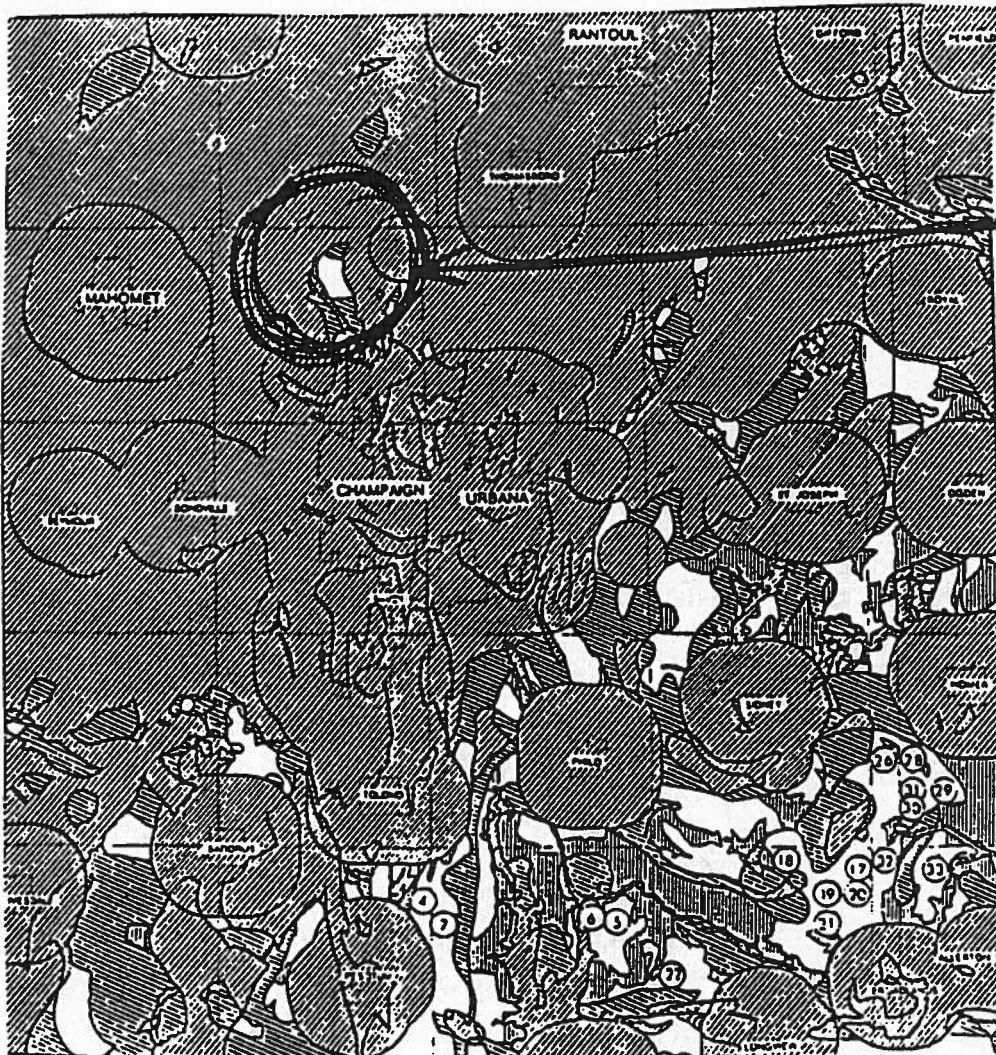
19. Regarding the criteria, "Zoning: Industrial or agricultural zoning is preferred," what percentage of land holdings of size 200 acres or more and are outside of the 1 1/2 mile exclusion are not in agricultural usage? Considering that percentage, does this criteria really simply say, "Keep the landfill out of municipal areas, make sure it is in a rural area." If not why not (please use the percentage in question in your response)? If it does simply say, "Keep the landfill out of municipal areas, make sure it is in a rural area", then did not the ISWDA double weight rural areas to the exclusion of urban areas where the waste problem is generated?

20. Regarding the criteria, "University of Illinois; Include all properties and make determination on a case by case basis to exclude research areas," what acreage and percent of University of Illinois land holdings outside of the 1 1/2 mile exclusion were exclude due to their research value? By the documentation in the ISWDA Report, that percentage was zero percent? Considering that percentage, does this criteria really simply say, "Keep the landfill out of municipal areas, make sure it is in a rural area.?" If not why not (please use the percentage in question in your response)? If it does simply say, "Keep the landfill out of municipal areas, make sure it is in a rural area", then did not the ISWDA double weight rural areas to the exclusion of urban areas where the waste problem is generated?

21. Since the last six questions revolve around the fact that the ISWDA really in effect stated only one criteria among these six, that is, "Keep the landfill out of municipal areas, make sure it is in a rural area", that means that a quarter of the ISWDA criteria had only one purpose. Weighting one concern six times more than any other is clearly unprofessional and unfair. Is this not unfair to rural and agricultural areas of the county? Is it also not unfair to the rural areas because they are responsible for such a small percent of the county's solid waste? In your answer to this question, please state the percentage of solid waste generated within the 1 1/2 municipal exclusion zone compared to that outside of it. (It is very clearly much less than 15%.) Does the ISWDA believe that the generators of the solid waste problem have no responsibility in participating in its solution in terms of the site of the landfill? Once again, in your answer to this question, please state the percentage of solid waste generated within the 1 1/2 municipal exclusion zone compared to that outside of it.

22. Considering these questions, is it not a good idea to call a moratorium on the landfill siting until Congress has the opportunity to develop national standards which would be fair to all and established on an objective and professionally recognized basis? If not, does this mean that the ISWDA is unwilling to adopt standards which would be fair to all and established in an objective and professionally recognized manner?

In summary, the ISWDA's report lacks professional viability, arbitrarily generates criteria which really means, "Get the trash out of our (the waste generator's) back yards, put it in a place where the people can be fooled into believing there is no alternative". It trades off a long term county economic advantage for a long term deficit. It uses criteria which are either not standard or are opposite standard procedures. It finds results which are opposite those that the State has published. Finally, the ISWDA's recommendation does not solve the problem of solid waste generation. This is a poor report, an unfair study. A landfill is the problem, not the solution.



WHAT ABOUT THIS LOCATION FROM THEIR OWN REPORT  
- NEAR THE SOURCE OF SOLID WASTE  
- NOT OVER A REGIONAL AQUIFER!

FROM:

MICROGOVERNMENTAL SOLID WASTE DISPOSAL ASSOCIATION  
OF CHAMPAIGN COUNTY, ILL.  
LANDFILL FACILITY  
  
SITE IDENTIFICATION STUDY

FIGURE 14  
LOCATION OF SITES:  
Preferred Sites

THEY SAY ONLY DOWN IN SOUTH EAST CHAMPAIGN  
OBVIOUSLY NOT!

Review by: Robert Lozar for the  
Help End Landfill Pollution (H.E.L.P.) Organization  
Point of Contact: Dean Rothermel Phone: 217-384-3093



*Land Fill Site Study  
Criteria Evaluation  
Review Statement*

**SUMMARY OF SITING CRITERIA**

Of the 26 criteria the ISWDA list as having been the basis of the Land Fill Site Study, a review of these criteria suggests that problems relating to poor or questionable land planning techniques have been found concerning the majority of them. Thus, what appears to be an objective study, is not at all. The problems found with the criteria group themselves into seven major areas of concern. They are:

- \*Lack of Depth in Report Preparation/Unprofessional Analysis techniques
- \*Arbitrary Criteria Used
- \*Criteria Unfairly Excludes Urban Areas
- \*Over 1/3 of the criteria say, "Make sure it is Rural Land!"
- \*Criteria Suggest Unstated Objectives
- \*Criteria/Report Inconsistent
- \*Criteria/Report Ignore Agricultural Base of County Economy
- \*Criteria Illegal

The following is complete documentation on this evaluation of the "Exclusionary" and "Inclusionary" criteria.

**Land Fill Site Study  
Statement Concerning the  
EXCLUSIONARY CRITERIA**

Criteria: Exclude all areas which overlay regional aquifers. (footnote 2 Defined as mapped sand and gravel thicknesses in the Glasford and Banner Formations in the 25 to 100 feet category.)

Page number/Source: Table 2, Criteria; Exclusionary: page 27

Evaluation: The exclusion of the regional aquifer is the criteria that caused the last land fill location (called Site B) to be dropped from consideration. Figure 12, "FINAL COMPOSITE MAP..." shows that a perfectly adequate site is located almost directly between

Champaign and Mahomet from which 75% of the County's solid waste is generated (from page 22 of the ISWDA report). The ISWDA claims that this site is in the aquifer. Yet their own very first criteria excludes such areas. Thus, two possibilities exist: 1. The report considers the site is not over the aquifer (it is not, Figure 6) and thus the ISWDA is ignoring its own report. 2. The ISWDA did not use their own first and most important criteria and thus the report is poorly done. Thus, their own study shows that a desirable site exists in an extremely desirable and convenient location, but that the ISWDS choose to ignore the most obvious possible site, probably to avoid controversy.

**Criteria:** Exclude all other areas overlaying sands and gravels as mapped with thickness greater than 5 feet and at a depth of 75 feet or greater. **Footnote:** Due to the nature of the way in which sand thickness data was mapped in the GIS system, this criteria actually applies to areas mapped as have 5-25 feet of sand at a depth of 75 to 100 feet. Applied by ISWDA staff on a site specific basis. See Section Five for discussion.

**Page number/Source:**Table 2, Criteria; **Exclusionary:** page 27

**Evaluation:** The thickness of the sand and gravel is not as important a point as the presence of clay "fissure" structures which will allow liquids to percolate through clays as quickly as through sands. The presence of these soil structures is one of the reasons that landfills regularly leak and regularly pollute the local water supply much sooner than predicted. Thus, the report ignores one of the most critical issues in siting a landfill.

In addition, the criteria stated and that used do not match. The limits of a GIS data set are not an excuse for incorrectly carrying out the analysis. In addition, the criteria states the depth is 75 feet OR GREATER while what was used was only 75-100 feet. Thus, by the location analysis, we do not know if some sites which should be eliminated were not (those where the depth was GREATER THAN 100 feet).

**Criteria:** Exclude all areas within 1000 feet from any public or industrial water supply etc. Exclude all areas within 200 feet of all other water wellheads, etc.

**Page number/Source:**Table 2, Criteria; **Exclusionary:** page 27

**Evaluation:** There is no legal requirement for this. It clearly does exclude urban areas since this is more likely to occur in more urban locations. Thus this is a double weighing of the urban criteria and unfairly makes the rural areas more vulnerable.

**Criteria:** Exclude all areas within 500 feet of a perennial stream.

**Page number/Source:**Table 2, Criteria; **Exclusionary:** page 27

**Evaluation:** There are no existing or proposed setbacks for perennial streams. The choice of the setback in this criteria is arbitrary.

**Criteria:** Exclude all areas within 1 1/2 miles of municipal corporate limits....

**Page number/Source:**Table 2, Criteria; **Exclusionary:** page 27

**Evaluation:** There is no regulation which makes this criteria necessary. It is completely arbitrary, particularly since it is these excluded areas which generate the majority of the solid waste. This is discriminatory to rural areas and their way of life. It is not appropriate that the rural areas be held hostage to the wasteful way of life of the urban areas.

Criteria: Exclude mine and pit areas.

Page number/Source: Table 2, Criteria; Exclusionary: page 27

Evaluation: Not all pits are located in rock, loose gravel or sand situations. Pit areas should be considered since they already are disturbed, thus would not change the nature of the current land use, since the nature of the subsurface is likely to already be known, since a pit area can be more thickly lined with impermeable materials, since the cost of acquisition is likely to be less, since the infrastructure is likely to already exist, since there is less likelihood of it becoming controversial.

Criteria: Exclude all areas within 1 1/2 mile of schools.

Page number/Source: Table 2, Criteria; Exclusionary: page 27

Evaluation: There is no regulation regarding a school set back. Though it sounds like a good idea, why should schools be excluded while farms with children living in them be included? This tends to exclude urban areas where population requires more schools, thus it is double weighing the analysis to exclude urban areas at the expense of the rural areas.

Criteria: Exclude all public lands.....

Page number/Source: Table 2, Criteria; Exclusionary: page 27

Evaluation: Why should public lands be excluded? They are already owned by the government so obtaining them for this usage is much less of a problem in terms of cost and controversy; no eminent domain action would be required. Remember, not all public lands are parks. Many are set-asides, easements and utilities (such as the current land fills). Thus, by this criteria, the current operating landfill sites are excluded. Thus, an expansion of them has been precluded.

Criteria: Exclude from the permitted area 2 or more acres of woodland.

Page number/Source: Table 2, Criteria; Exclusionary: page 27

Evaluation: Why exclude woodland? Woodland in this area of the state are those areas which are unproductive for farming. Thus, you have excluded that land which is poor for any economic use and focused in on those lands which are the most valuable economically in the entire world! If the criteria is intended to imply a soils type, then use the soils map, not something else which makes no sense.

Criteria: Exclude wetlands.

Page number/Source: Table 2, Criteria; Exclusionary: page 27

Evaluation: Without the agricultural drainage tiles, most of the current farm land would be either wetlands, or marginally wetlands. Thus, for the purpose of deciding on a landfill, one must exclude not those areas which are currently wetlands, but those areas which if not maintained by tiling would return to a swamp/marsh grassland state). This means that in Champaign county, the high areas are those which in general qualify.

## Land Fill Site Study Statement Concerning the INCLUSIONARY CRITERIA

**Criteria: AREA: 200 acres or more of suitable land is preferred.**

**Page number/Source: Table 2, Criteria; Inclusionary: page 28**

**Evaluation: This is an unwarranted amount of area. If the actual area to be used for the landfill site need be only 65 acres, and the rest is proposed to be buffer, than the 200 acres criteria must favor only rural areas. Once again, this criteria is an unfair and unprofessional double weighing of the "must be rural location" bent of the entire report. Smaller acreage minimums would show the presence of suitable land in locations where the required transportation costs could be significantly lowered.**

**This criteria also implies that it is the the intention of the ISWDA to ultimately use the entire site, not just that currently being proposed. Once in place, of course, the controversy associated with a landfill expansion is not nearly as great as that of the landfill establishment. Thus, this criteria implies an insidious, currently unstated intent of the ISWDA.**

**Criteria: Ownership; Three or fewer owners are preferred.**

**Page number/Source: Table 2, Criteria; Inclusionary: page 28**

**Evaluation: This criteria is a matter of convenience and is another means of double weighing rural land versus urban land since almost all parcels of large land owned by few individuals are agricultural in this county. The concept is to avoid as many legal actions as possible, rather than find an adequate site for a landfill.**

**Criteria: Parcel shape: A regular shape is preferred.**

**Page number/Source: Table 2, Criteria; Inclusionary: page 28**

**Evaluation: Why? If you are truly basing the criteria on objective considerations such as the distributions of natural soils, it is unreasonable that a regular shape will be the resultant shape if a fair analysis is carried out. Therefore, it becomes clear that this is no more than another unfair and unprofessional double weighing of the "must be rural location" bent of the entire report. In large urban areas where rural land is not available, adequate sites are found without the requirement or the luxury of a "regular shape". This is an entirely arbitrary criteria.**

**Criteria: Zoning: Industrial or agricultural zoning is preferred.**

**Page number/Source: Table 2, Criteria; Inclusionary: page 28**

**Evaluation: In a previous exclusionary criteria, the ISWDA has excluded areas near incorporated locations, where the vast majority of Industrial zoning exists. Thus, in essence, this statement really simplifies to: "Zoning: AGRICULTURAL zoning is preferred." Once again, this criteria is an unfair and an unprofessional double weighing of the "must be rural location" bent of the entire report.**

Criteria: Productivity Evaluation; A lower productivity rating is preferred (to be used in conjunction with on-site investigations).

Page number/Source: Table 2, Criteria; Inclusionary: page 28

Evaluation: Though this is a stated criteria for the "Preliminary Landfill Site Identification Criteria", in fact it was not used at all. Since the soils map was available (page 38), was used extensively in this report, and the soils map implies agricultural productivity as published in the US Department of Agriculture County Soils maps (including Champaign County), there is no reason that this information could not be employed by using the GIS technology. This criteria could EASILY be incorporated at the preliminary stage analysis. The result is that the analysis did not consider the ISWDA's own criteria. It also shows a lack of sensitivity to the consideration of the County's economic base. There exist current Federal Laws (the Prime Agricultural Lands Preservation Act) which attempt to encourage incorporation of this type of consideration. As neither the simplicity of carrying out this analysis nor the existence of Federal Laws concerning this criteria made any influence on the report, it can only mean that the report has once again ignored the agricultural values of the local community as well as the ISWDA's own criteria.

Criteria: University of Illinois; Include all properties and make determination on a case by case basis to exclude research areas.

Page number/Source: Table 2, Criteria; Inclusionary: page 28

Evaluation: In fact, what the actual analysis shows (Figure 9, page 52) all U. of I. areas which were urban in nature were excluded and ALL areas which were rural, evidently entirely independent of their research value, were included. Thus, this criteria once again really was no more than "Do not consider urban areas, make sure the result is rural."

Criteria: Threatened or Endangered Species: Include all areas of sightings; make determination on habitat impact on a case-by-case basis.

Page number/Source: Table 2, Criteria; Inclusionary: page 28

Evaluation: The possible presence of Threatened or Endangered Species is clearly a legally binding EXCLUSIONARY criteria, not an INclusionary criteria where it is found in this report. It is also one major criteria which would tend to favor rural areas over urban locations, yet the bent of the report is so strongly to the disadvantage of the rural areas, that even this legally binding criteria is located in the wrong place. Further, this criteria was not even addressed anywhere else in the report, through it clearly has significant legal impact.

Criteria: Historic Places; Include all sites; make determination on appropriate remediation, if necessary, on a case-by-case basis.

Page number/Source: Table 2, Criteria; Inclusionary: page 28

Evaluation: The presence of historic sites is clearly an EXCLUSIONARY criteria, not an INclusionary criteria where it is found in this report. However, when addressed in the report, the historic sites are actually used as exclusionary criteria. It is clear the report was sloppily prepared.

## Vita

**NAME:** Robert C. Lozar. MLA

**POSITION/TITLE:** Principal Investigator for Geographical Analysis/Community Planner

**EDUCATION:** Bachelor of Landscape Architecture, University of Illinois, 1970 Master of Landscape Architecture & Regional Planning, Harvard University, 1973.

**EXPERIENCE:** Seventeen years experience in preparation of Environmental Impact Analyses with emphasis on Geographical Information Systems (GIS) technology applications, impact forecasting and tradeoff evaluation techniques, supporting guidance and documentation, management of military installation resources.

**EMPLOYMENT:** Environmental Division, U.S. Army Corps of Engineers, Construction Engineering Research Laboratory.





January 9, 1991

To the ISWDA,

We are residents of South Champaign County, rural Homer, directly to be affected by the proposed landfill for this area.

We want to go on record of the Landfill Hearing as opposing the proposed landfill.

The reasons are numerous, and we feel, valid. Our water supply is certain to be affected with all the discarded contaminants, polluted, for both people and animal. Why would you consider that this area with small aquifers is not important? There are people relying on this source. Aren't you discriminating against a few people to gain landfill that could very well be a hazard to the area residents. And if it is true, as you say, that this landfill will not leak, put it closest to the source of the trash, Champaign.

It is also an issue to us that all our farm land is tiled, with drainage to help many acres remain in a good farmable condition. What will the proposed garbage dump, when it starts leaking, do to the sub tiled water? The water in these drainage tiles goes directly to one of the cleaner streams of the county, to be used by a village downstream as the water supply. Think on ISWDA's responsibility for creating a contaminated water supply for another village, besides Homer.

Surface water drainage is so that the water from the area designated will be going North to Homer and their water supply, South East to the above mentioned stream, and believe us, ISWDA will be held responsible.

It is interesting also to note, that site 29 was specified with one point being that highway access was good—Christmas week that highway was closed because of water across the fields and the highway. That highway could not have tolerated garbage trucks for a number of days then and that is certainly not an unusual occurrence many times in a year of good rainfall.

Small issues perhaps, with easy answers to "fix" it all, but certainly long term

serious and expensive effects for more than it would seem at first.

We URGE the ISWDA to consider other methods of disposal, incineration, thermal disposal, source reduction, recycling, but definitely not another leaking, poisonous, landfill that will certainly not be a long term, safe answer to the county's garbage problems.

Shirley L Taylor  
L. Max Taylor  
P.R. #1 Box 48A  
Homer, AL 36184

ARMINTA ELLIS, DONALD MORGAN, MARK BAIRD, KENNETH MacINNES  
Township Trustees

GALE S. HENRY  
Supervisor

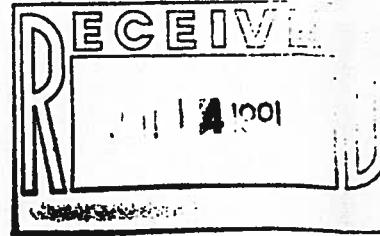
HOWARD F. MOHR  
Highway Commissioner

## SOUTH HOMER TOWNSHIP

KATIE WOODMANSEE  
Clerk

OFFICES IN CIVIC CENTER      PHONE 896-2011  
HOMER, ILLINOIS 61849

SUSIE MOHR  
Assessor



I.S.W.D.A. BOARD:

We, the Trustees of South Homer Township have never been contacted officially by the I.S.W.D.A. Board. We are elected officials whose duty it is to protect the citizens of South Homer Township in regard to this areas roads, welfare, tax base and safety.

The siting of a Garbage Dump in our Township will have a very negative impact on property values. Several Real Estate Agents estimate it will lower the assessed valuation by at least 10% for the whole township including the Village of Homer. This will have a severe impact on the budget of the Township, the Fire Protection District, the Village of Homer, Heritage School District and Drainage Districts in the area.

The site that has been selected for drillings is on a glacial ridge.

The water drains off of this site in all directions, both on the surface and in tile drainage. A 3 inch rain last week had the run off running through the Homer City Limits in a drainage ditch within 4 hours. This is a concern to all of us. No provisions have been made to retain the Toxic waste from flowing onto adjoining property. There has been no provisions to supply water to neighbors who have their water supply destroyed. A farm can need several thousand gallons of water a day. You cannot use polluted water for any use.

We feel that we should be given the results of the test borings as soon as you receive them.

ARMINTA ELLIS, DONALD MORGAN, MARK BAIRD, KENNETH MACINNES  
Township Trustees

GALE S. HENRY  
Supervisor

HOWARD F. MOHR  
Highway Commissioner

## SOUTH HOMER TOWNSHIP

KATIE WOODMANSEE  
Clerk

OFFICES IN CIVIC CENTER      PHONE 896-2011  
HOMER, ILLINOIS 61849

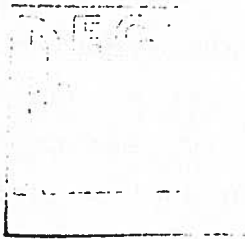
SUSIE MOHR  
Assessor

If a site is chosen in our area, over our objections, the I.S.W.D.A. should make payments to all of the Taxing bodies that are affected for as long as this land is not taxable. You should also agree to provide an adequate safe water supply to all residents at no cost to them.

We have attended several of your Board meetings and you give the citizens very little information of what you are planning. We would expect to be informed of what you are doing.

We hope that you will take this letter under serious consideration.

*Gale S. Henry, Supervisor*  
*Donald Morgan, Trustee*  
*Mark A. Baird, Trustee*  
*Arminia M. Ellis*  
*Kenneth H. Mac Jones, Trustee*  
*Ellen R. (Susie) Mohr, Assessor*  
*Howard F. Mohr, Highway Comm*  
*Katie Woodmansee, Clerk*



12-28-90

ISWDA Board,

I am writing this letter to express some of my ideas and concerns. I'm not sure it will do any good but I feel I have to try.

Most of the garbage in Champaign County is produced in the cities of Champaign and Urbana. I think there should be some laws made and enforced to make recycling mandatory in the cities and county. I see nothing wrong in having four garbage cans - one for glass - one for aluminum cans - one for metals and the other for table waste. Newspapers and cardboard can be tied up in bundles.

This board should be trying to reduce the waste that goes into the landfill. You should be listening to some of the suggestions that have been made and pointed out in the public input part of these meetings of the ISWDA.

I also feel a multi-county landfill might be the way to go instead of every county having a landfill.

If you do pick a site for a landfill in the south-east part of the county - how are you going to compensate the land-owners around the landfill for the devaluation of their property.

Another "BIG WORRY" is the pollution of the water for the people who live close by the site. No one

"invisible enemy"- toxic waste from indiscriminate landfill dumping. Undoubtedly the controls would be no better exercised than the ones on the currently leaking Villa Grove landfill. God only knows what has been dumped there in the wee hours!

I can't believe you are proposing to destroy some of the best and most productive farm land in the country for a garbage dump. Incineration would seem to be a far more desirable alternative along with aggressive recycling. The power generated by the incinerator will more than pay for itself; especially with the decline in fossil fuels in the future.

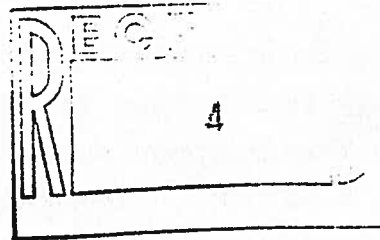
Sincerely,

A handwritten signature in black ink, appearing to read "Donald R. Mitsdarfer". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Donald R. Mitsdarfer  
LTC U.S. ARMY retired  
2606 Valhalla Place  
Leavenworth, KS 66048

R.F.D. #1 Box 29  
Longview, Il. 61852

Jim Pendowski  
209 W. Clark Street  
Champaign, Illinois



RE: Concerning the Solid Waste Plan

Dear Mr. Pendowski,

We have many concerns on your present plan. We feel you ought to get your recycling part of the plan, source reduction and transfer station all working before siting the landfill. Especially, since you can still haul another ten years to Danville. This will give you time to find other alternatives to siting a landfill. We know all landfills leak. The largest concern of the plan is the landfill.

The number one concern is the polluting of our water. You will pollute the water. The wells are only 15 to 80 feet deep in the south-east corner of the county where both proposed are located. How far will you reach out to take care of the people's water after it's polluted from the landfill? We think the water will have to be piped from Sidney or Philo at no expense to the persons surrounding both sites, because their water is free now.

How are you going to take care of the run off from these proposed sites since the water gets away through surface or drainage tile? We have shallow wells and it will get into our drinking water and also pollute streams and rivers which will pollute others drinking water.

Our next concern is the devaluation of our property. Our homes and land are going to have less value because of the nearness of the landfill. How are you going to compensate us for the loss of our value after the closure of the landfill? After 65 acres have been filled what guarantee do we have that more property won't be purchased to make another landfill in that immediate area?

Is there going to be money put in escrow to take care of problems which will arise after the closure of the landfill?

How do they plan to take care of the odors and vermin and the trash blowing around our area? The stagnant water will bring unwanted



mosquitoes which could cause illness to our children and other family members. How will you take care of this mosquito problem?

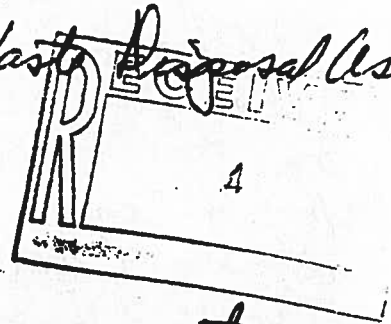
Another concern is the traffic which will be produced by all the garbage trucks. They will hinder the farmers safety moving of their heavy farm equipment up and down the roads.

We do want the loopholes in the Solid Waste Plan closed that would allow any garbage to come outside the county and absolutely NO nuclear waste put in this dump.

I hope you will read and inform your ISWDA Members of this letter... and really think over and discuss our many concern to do with the Solid Waste Plan. Thank you for your time and consideration.

Sincerely,  
*Larry R. Frick*  
*Judy Frick*  
Larry R. Frick  
Judy Frick

Intergovernmental Solid Waste Disposal Association  
299 W. Clark Street  
Champaign, Ill 61820



Dear Sirs:

I am writing to you as a property owner who owes land next to the Proposed Landfill Site 22B.

I am wondering about the devaluation of my property and also the loss of the taxes to the Heritage School District #8. Is Champaign County or Champaign-Urbana going to provide the extra tax for these School Districts?

Another problem we are going to have is the drinking water for all the persons living within 2 or 3 miles of the landfill. I would think that we should have our water piped in from Phila or Sidney, so that we have the same drinking water as you people have in Champaign-Urbana because we have to take our old garbage ruin our Prime Farm Land, which they are not making anymore of, just to satisfy the needs of Champaign-Urbana.

I think that these matters need to be cleared up before you site a Landfill in our neighborhood.

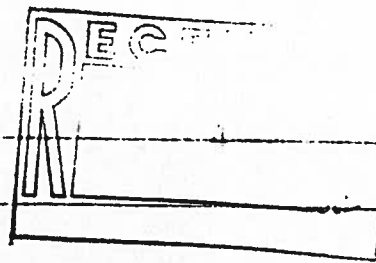
Is the Champaign County going to pay for these matters, for the life of the Landfill? Also what about the rodents, etc.

Who is responsible for these?

Another problem I see is the traffic, on the Bongaul Road. A Person has a hard time now, getting your Machinery down that Road. If we have all the Truck Traffic it will be dead Row especial around the Curve from Route 130, you can't see around it now. Is the County going to carry the necessary Liability Insurance to protect the people driving this Bongaul Road, with all this extra Traffic. Also the mud on the Road. These are important points that need to be considered before you site a Landfill in this area.

I think you need to consider or take a more look at Incinerator for the County of Campaign. I should be located in Campaign - Albana where the source of Harbor is, less Transportation Costs. It would benefit the U of I, to use as steam or the electricity, one good point. Another point I want to make is that all the Drainage water from this area goes right into the Embarrass River, people from Charleston, Newton, Cattle, Livestock all get their drinking water from that River. You should think of all the people, it would effect, not only people from Campaign - Albana, but all the people down state on the River,

Jan. 10, 1991



ISWDA Board,

We are Robert and Ramona Mitedarfer. We and our three children live next to the new Site 22 B proposed landfill site. We own our home and our land within  $\frac{1}{4}$  of a mile from Site 22 B. We have several questions that we would like to have answers to.

#1 Are you going to pipe in city water from Philo or Sidney, which will be Northern Illinois Water Co., for all the residents within a 2 mile radius of the landfill free of charge? We don't pay a water bill now and have very good water from a 62 ft. new well we had dug April 1990. We don't want Villa Grove city water because the Multi County Landfill by Villa Grove is leaking now! It is under investigating for polluting now.

#2 Are the ISWDA board, Champaign County board, City of Champaign and City of Urbana going to reimburse us for our devalued homes and farm land?

#3 What are you going to do about flooding on site 22 B? Wouldn't this be a problem if a landfill goes in?

December 29 and 30, 1990 we had 2 inches plus of rain, which is not uncommon in this area. The

So now is the Time for Action, to  
reconsider this landfall site 27B,  
before you make a Big Mistake you  
will have to live with, the rest of  
your life and your Children, Children  
in-laws, etc.

Victor / Matuszko  
Rt 1 / Box 48  
Colon, Ill 61880

road was flooded and a large portion of the land on Site 22 was under water and this was just from 2 inches plus of rain. A lot of times we have 4 inches of rain and it is much worse!

#4 What is to be done about the added volume of traffic by our home?

#5 What will be done about the mud and debris coming out of the landfill and along the roadsides making for dangerous driving and flat tires?

#6 How will we be able to drive our farm machinery on the road with added traffic?

#7 What will be done about stink and rodents around a landfill?

#8 What would you do if your children had to live in such an unhealthy situation?

#9 How much money will be put into escrow to cover all damage and clean up caused by a landfill?

In closing, we want you to know how our whole family has been affected by the possibilities of a landfill near our home. Look at your own life and family. What would you do and how would you feel if something threatened the land you lived on, the very job and livelihood you have, your home and your children's very life and future life?

Yes, farmers and farming are a very different way of life, but we try and preserve this good land that feeds you and the nation. Don't you think that we deserve some respect and attention to our needs? Please listen to what we are saying and what you would be doing to so many resources we all need, if you ruin them with another landfill. Seek up to date information about alternatives to landfills and do not jump into a decision that would take away from this earth rather than helping it.

Sincerely,

Rabat Mitdayer  
Ramona Mitdayer

R.R. #1 Box 14

Longview, Ill. 61852





# CITIZENS FOR A SAFE ENVIRONMENT

P.O. BOX 151  
VILLA GROVE, IL 61956  
(217) 832-9292

January 14, 1991

TO: ISWDA Board Members and James J. Pendowski - ISWDA  
Staff Manager

FROM: Residents of Champaign, Douglas and Coles Counties

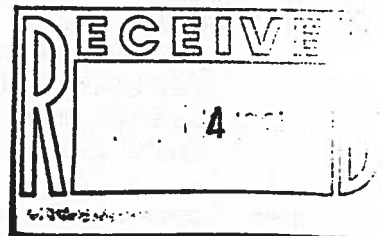
This letter is written regarding the Champaign County Draft Solid Waste Management Plan. Citizens are becoming increasingly aware that we can no longer afford to rely on unsound and outdated waste disposal practices that simply perpetuate an out-of-sight, out-of-mind mentality toward garbage. Everyone--homeowners, schools, business and industries, state and local governments--must play a role in solving our garbage problems by treating our waste as a resource, not just a burden to unload.

Moral, ethical, economic and environmental issues are some of the sincere and legitimate concerns about the long-term implications of what might be short-term decisions or solutions.

We certainly hope you will take into consideration the various recommendations for changes and improvements to the Draft Solid Waste Plan that are being submitted to you.

Respectfully,

Citizens for A Safe Environment



"Never doubt that a small group of thoughtful, committed citizens can change the world: indeed, it's the only thing that ever has."  
Margaret Mead

RECYCLED PAPER



WASTE REDUCTION AND RECYCLING

In order to reduce the amount of waste the following should be considered:

- . Expansion of waste reduction education programs to homes, schools, and businesses
- . Create financial incentives
- . Mandatory recycling programs
- . Establishment of positive incentives to encourage the use of recyclable products
- . Establishment of disincentives to discourage the use of non-recyclable and toxic products
- . "Pay-by-can" programs
- . Expanded recycling services to small communities and rural residents
- . Prioritize waste reduction and source separation

LANDFILL SITING

The following are comments, questions and recommendations:

- . There is a lack of data on the dynamics of the ground and surface water resources, i.e. aquifers, drainage, flooding
- . A detailed environmental impact statement should be submitted for each of the preferred sites. Specifically:
  - . potential hazards to the safety and health of residents living near the site
  - . plants and animals - both domestic and wildlife
  - . threatened and endangered species
- . Replacement Water - Will residents living near the site and others that will be affected by water contamination be guaranteed a safe, reliable supply of water at no cost infinitely?

# INTERGOVERNMENTAL SOLID WASTE DISPOSAL ASSOCIATION

CHAMPAIGN COUNTY  
CITY OF CHAMPAIGN  
CITY OF URBANA

December 14, 1990

Mr. Jon McNussen  
Citizens for a Safe Environment  
P.O. Box 151  
Villa Grove, IL 61956

Dear Mr. McNussen:

This letter is in response to your inquiry dated December 7, 1990 (received December 10, 1990) concerning the preliminary boring program described in the Landfill Facility Site Identification Study. In particular, you requested clarification of the phrase "extensive sand lenses" within forty feet of the surface.

Generally speaking, the ISWDA staff and its consultants will work with the definition that an extensive sand lens is: (1) thick (greater than 10 feet); (2) continuous across the site and can be identified beyond the footprint boundary; and, (3) of predominantly sand or sand and gravel (coarse materials) as opposed to fine material with a coarse component. Expressed as a permeability value, this would be materials exhibiting permeabilities on the order of  $1 \times 10^{-3}$  cm/sec.

In previous landfill design work done at Site B, three design alternatives were reviewed with regard to the depth to the base of the landfill: (1) Above grade (suggested by Central States Education Center); (2) Shallow (30 feet below grade) and; (3) Deep (50 feet below grade). The preferred design was the shallow design. This design is assumed to be the template for the new facility and the depth below grade. Thus, the 40 foot depth is a measure related to the constructability of the landfill. Consequently, the phrase "continuous across the site" in particular would relate to that portion of the site on which the footprint of the landfill is placed.

I hope this will provide some clarification. Should you have any further questions, please advise.

Sincerely,



James J. Pendowski  
Manager

cc: RMT, Inc.  
ISWDA Board

mcnussen.ltr

209 W. Clark St.  
Champaign, IL 61820  
217-352-6466

. The draft plan does not clearly specify the cost of leachate management as well as methods of its collection, transportation and treatment. Does the ISWDA plan to use the Champaign-Urbana sewage treatment plant to process the leachate? If so, is this facility equipped to process the leachate? In the event of a plant shutdown what would be the financial ramifications?

. Unfortunately, there was never a formal public hearing to describe and discuss the landfill siting procedures. The ISWDA eliminated site 22 as one of the preferred sites and located another site nearby - Site "22B." Site "22B" was not originally included among the 33 potential landfill sites. This raises grave questions as to the consistency, equitability, and objectivity of the site identification study, as well as the entire Draft Solid Waste Plan.

. Is the ISWDA staff going to do a complete study and cost analysis to evaluate this new site (22B)? (i.e. professional services, "engineering," construction, leachate control, etc.)

. Are any kind of site acceptability standards and procedures going to be established for the two current preferred landfill sites? If so, what are they?

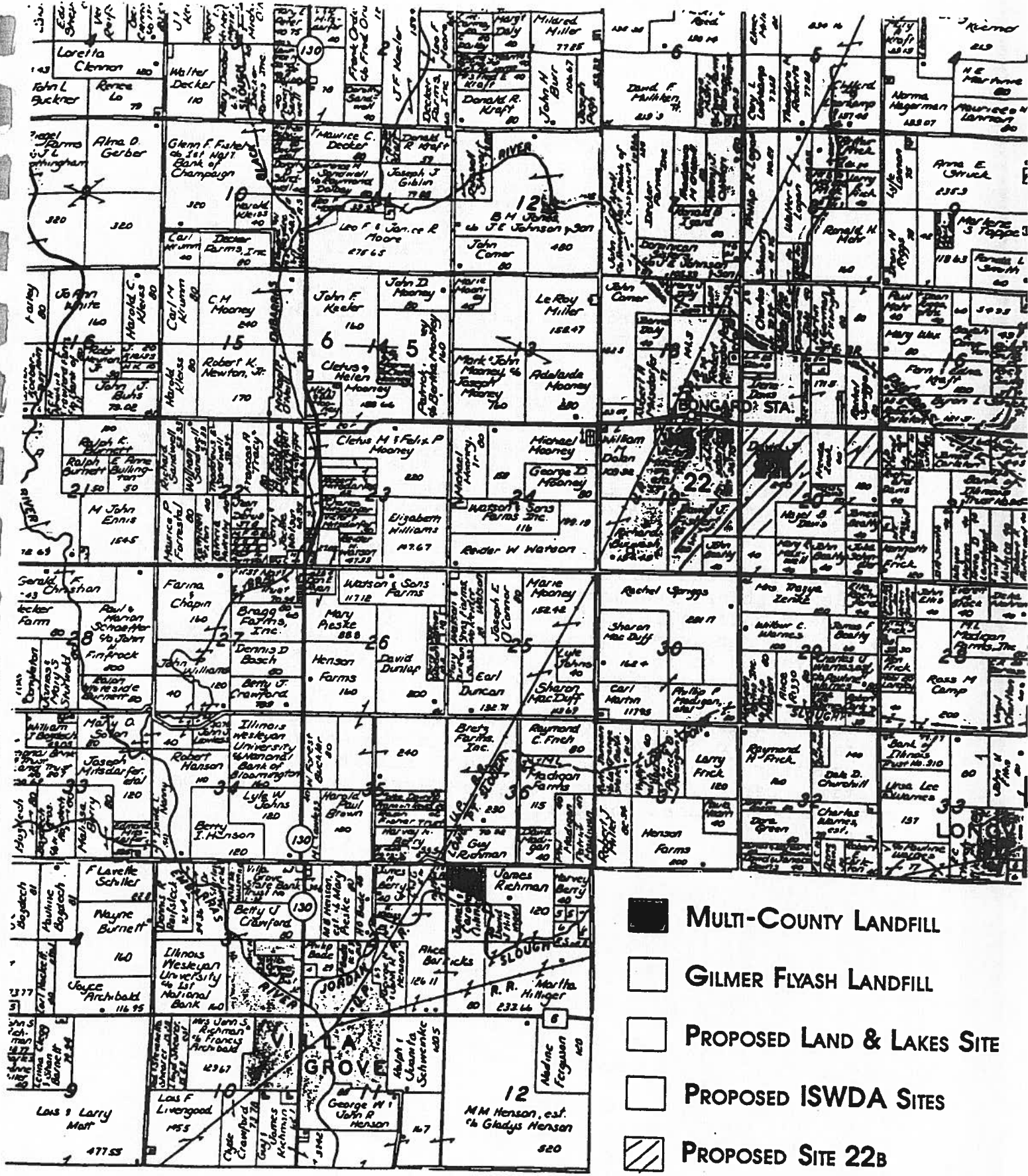
. Is the ISWDA going to establish trust funds to insure financial security for things such as:  
- possible future superfund clean-up costs at the new landfill?

- compensation to residents living near the landfill site including members of Immaculate Conception Catholic Church (i.e. accidents, contamination or threat to the church community)?

This question is in reference to the letter on the following page:

Will the ISWDA staff please give further definition to the highlighted phrase (2) in paragraph two:

"(2) continuous across the site and can be identified beyond the footprint boundary;"



# LANDFILL SITE IDENTIFICATION

SCALE: 1 - 1/4 = 1 MILE

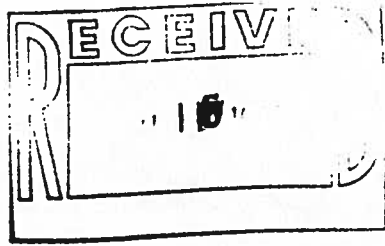
Of particular interest to us is the potential siting of a landfill in the Embarrass River system. On the following page is a map which shows the numerous proposed sites as well as existing sites. The Multi-County Landfill and Gilmer Flyash Landfill are currently being investigated. It has been determined the Multi-County Landfill has been leaking hazardous materials into the waters of the State of Illinois. Based upon location and history, there is serious concern that these landfills will continue feeding into the Embarrass River system.

The ISWDA has narrowed down site "22B" as one of the two possible locations for the Champaign County Landfill. The decision to choose this as a possible landfill site clearly poses a threat to this environmentally sensitive area. The cumulative effect of multiple sites potentially feeding contaminants into the Embarrass River system and presenting hazard to drinking water is not pleasant to contemplate.

This ecosystem provides resources to many people as well as various plant and animal life. Among the most vital and complex of these resources is water. Scientists and engineers once believed "dilution was the solution to pollution," at least for surface waters. This naive axiom has proven to be ineffective for surface waters and even less appropriate for groundwater.

Given the difficulties associated with cleaning up contaminated groundwater and the interconnectedness of groundwater with surface water, soil and atmospheric systems, can the ISWDA actually recommend this to be one of the two best places to locate a landfill in Champaign County?





Morris Daves  
Springfield, Ill.  
12 January 1991

James Bendowski... manager  
Intergovernmental Solid Waste Disposal Association  
209 West Clark Street  
Champaign, Ill 61820

Dear Sir:

I have several concerns in the "Champaign County  
Solid Waste Management Plan".

The Plan hasn't made provisions for the community  
around a landfill. A landfill will pollute under-  
ground water, it will pollute all the neighboring wells.  
Make provisions supply good water without cost to those  
in the polluted area around the landfill.

The landfill will effect the community near it  
by devaluating the property. These persons or property owners  
should have reimbursement similar to the purchase price



of the land purchased (three times the devaluation etc).

Should the landfill pollutants leave the landfill property, there should be reimbursement paid equal to the loss of crops or living expenses should it effect a home, without litigation.

There should be a fund in escrow for any damages or later clean up, should the landfill leak in a manner that persons could be harmed by the landfill pollutants. (a portion of the tipping fee etc).

If this is to be a county landfill, make a statement in the plan that "no other dumping than Champaign county garbage.

Make provisions to control methane gas, a poison, from getting into the community air.

There is talk of I. S. W. D. A. stating the polluted water coming out of + off of the landfill will be hauled away to be processed (Each one inch of rain will be 27,154.28 gal. on each acre, on 65 acres it is 1,765,028.2 gal.) a new impossable task + it would be much expense

Farm land in this county needs drainage, make provision to maintain + not pollute this drainage system.

I have a new scenario not mentioned in part II, page 134, in columns "Expanded processing without county disposal" for a time + changing to "in county disposal" in this plan. It could be a regional plan. Recycle always as much as possible at site + transfer station + curbside (preferred). Place a waste

- to energy plant near, between or on, the Champaign  
or Urbana landfills (now closed). As the nonrecyclable  
waste going through the waste-to-energy plant, one  
of the old landfills can be also put through the  
waste-to-energy plant and in time reducing the old  
landfill of Champaign + Urbana. Placing a new and better  
liner. Reducing old landfills in volume + placing  
the ash into the now reworked old landfill. The  
reduced volume should make space in the old land-  
fill that would last the county many years (50 years).

question

Look into thermal processors new technology.

K.O.F.C. (Keep our environment clean)

Jerry Peroutka

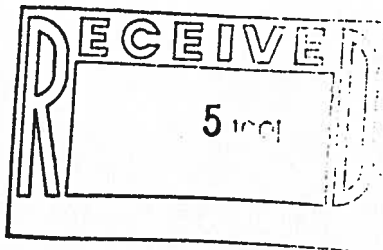
618 S. Monroe, Clinton, Ill. 61727

217-934-6303

Sincerely

Morris C. Dewis

RR #1 Box 12 Long View, Ill 61852



332 County Road  
1600 East  
Philo, Illinois 61864  
December 12, 1991

James Pendowski, Manager  
Intergovernmental Solid Waste Disposal Association  
209 West Clark Street  
Champaign, Illinois 61820

Dear Mr. Pendowski;

The following are requests and questions that need to be addressed and answered prior to your implementation of the final Champaign County Solid Waste Plan:

1. What will be our source of drinking water supplied to our home by the I.S.W.D.A.?
2. Will there be any changes in the present travel highway route from the Urbana, Illinois city limits to the landfill site?
3. What will be the delivery truck route from the Transfer Station to the landfill site?
4. How much money will the Champaign County Board put in escrow to cover the inevitable expense of maintenance and clean-up after the landfill is closed?
5. How much money will the Champaign County Board put in escrow to cover the potential health hazard to any and/or all of my horses caused by water contamination?
6. How much will the Champaign County Board pay us for the loss in value to our real property?
7. What guarantee do we have that the garbage delivered to the new landfill will be exclusively from the Champaign County residence?

Thank you for your consideration. I will be waiting to receive your response to my requests and questions.

Sincerely yours,

*David P. Block*  
David P. Block

Richard Schwartz  
R. R. 1 Box 16  
Longview, IL 61852

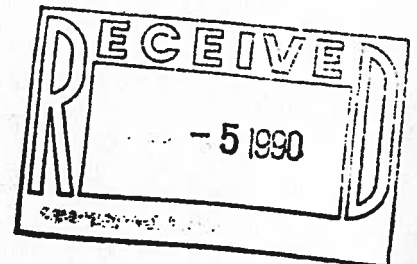
DRAINAGE TILE

I want to address the issue of drainage. Every farmer knows the importance of farm tile drainage. If the landfill were to be located on either of the two potential sites tile would be destroyed and drainage disrupted. A large acreage can depend on a single tile crossing over land owned by several landowners.

Will the drainage tile that would be destroyed be replaced at the proper depth and grade so that they can drain ground water away?

There are several thousand acres involved in the drainage district in each of the two sites. I do not feel there has been enough research done in the area of drainage tile. It is my contention that the drainage tiles will become sewers for the landfill instead.

It is also know that any changes in the natural flow of water must be in accordance with State and Federal laws.



RECEIVED  
- 5 1990

I am Robert Mitsdarfer. I live at R.R.#1 Longview, Illinois, next to the new proposed Site 22 Landfill. I have several concerns I would like to state.

I would like to know what ISWDA, Champaign County, the city of Urbana or the city of Champaign are going to do about our water. Who is going to pipe city water in to all the people around the site that you pick? Are you going to furnish us water forever, at no cost to us? We do not pay any water bills now.

I don't know if you know it or not, but, most all of the water wells in our area are from 30-80 feet deep. If you put a landfill by us you will contaminate the water wells, because you can't make a landfill that will not leak! Don't you think our aquifers are just as important to us as the aquifers around Champaign and Urbana? You say in your criteria that you do not want to harm endangered species, don't you think human lives are more important?

Are you going to reimburse us for the devalued property and our homes? You know that our home and property will be devalued by a landfill!

Are you going to reimburse the Heritage School District #8 for loss of tax money from the devalued homes and property?

What about the truck traffic by our homes? How are we to deal with that and our farm machinery on the road?

Who will see to it that there is no blowing litter? Don't tell me there will not be any, because I live within 5 miles of Multi-County landfill at Villa Grove. There has been all kinds of blowing litter and debris along Route 130 when it was in operation, prior to it closing in July of 1990.

What about the stink and rodents around a landfill?

What about mud on the road coming out of the landfill?

*Mitsdarfer*

You are trying to put a landfill on the best prime farmland in the world! You know they are not making any more land. Once you put a landfill on farmland it will be ruined forever! If you would look at the Soil Survey Book of Champaign County on sheet #134 and page 151 Sanitary Facilities, it says Site 22 is poorly <sup>x</sup>sited for a landfill. Look at it yourself.

We have 3 young children. They love to play outside. What are we to do about the traffic? What are we to do about rodents? What kind health problems would this bring about? Would you like to live out here with your children?

What are we to say when our children ask us---Why do we have everyones garbage here? Do we say---because the Champaign County Board and especially ISWDA will not listen to modern technology and spend money for other means of disposal? Are we to shoulder everyone elses garbage problems when farmers have been recycling their garbage for years! Now, our future generations(our children) will not have farmland to farm---just a landfill to look at!

What about the cost? Thirty-three million plus, as stated in the News Gazette. What about the liability to clean up a landfill? You can't make a landfill that will not leak! If you think you can build a safe landfill that will not leak, why not build it close to Champaign and Urbana over your aquifers! This would cut down tremendously on the cost of transporting garbage and save our rich farmland, too. It would cost millions and millions of dollars to clean up a leaking landfill. Guess who gets to pay for it? You guessed it---the taxpayers of Champaign County. These are the same people who get to pay for the landfill.

I hope you board members think again about the seriousness of this before you go ahead and approve any landfill.

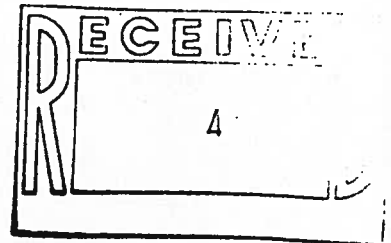
*public hearing*



January 1, 1991

To: ISWDA Board and Staff

From: Robert E. & Grace G. Carleton  
322 County Road 2000 East  
Longview, IL 61852



The State of Illinois Solid Waste Management Act, established in 1986 reads as follows:

It is the purpose of this Act to reduce reliance on land disposal of solid waste, to encourage and promote alternative means of managing solid waste, and to assist local governments with solid waste planning and management. In furtherance of those aims, while recognizing that landfills will continue to be necessary, this Act establishes the following waste management hierarchy, in descending order of preference, as State policy:

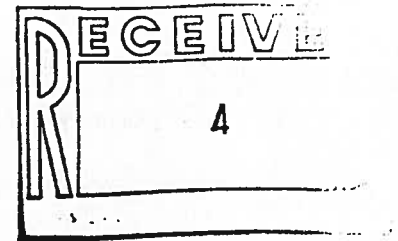
- (1) volume reduction at the source;
- (2) recycling and reuse;
- (3) combustion with energy recovery;
- (4) combustion for volume reduction;
- (5) disposal in landfill facilities.

We believe that Champaign County Solid Waste Management plan should follow the State of Illinois Management Act. In addition to the above State of Illinois Solid Waste Management Act, additional protection from economic devaluation and water contamination must be provided to residents and property owners who are within one mile of the perimeter of the landfill site and any others who will be affected by landfill operations.

1. In as much as the ISWDA has offered an amount of three times actual value for a landfill site, at least three times the actual appraised devaluation of those affected must be paid.
2. Knowing the depth and condition of the wells surrounding site 22B, a safe and adequate water supply must be provided to all of those within one mile of the perimeter of the proposed site. Deeper wells are not acceptable because of the known quality of water at the deeper depths. Piping water from Villa Grove is also not acceptable, since their water in previous tests have shown to contain landfill leakage. This water must be provided to the present and future inhabitants of these homes at no cost whatever, for any amount of water, forever. This is to be understood that there be no limits or restrictions placed upon the amount required for the residents of this area or their farming operations. This water supply must be in place, tested, and proved to be safe before any landfill operations begin.

The above letter is to be placed on file for the Solid Waste Management Plan review.

January 1, 1991



To ISWDA

As a landowner I am very concerned about the proposed landfill site which has been chosen South of Homer; because this landfill will ruin our water. The water that flows off this proposed site goes South into the big ditch which flows to Georgetown, Il. and that is where this town gets its drinking water, let's not endanger their lives.

We also have good wells and good drinking water which we want to keep and I'm not for trucking water to us. Good water is very precious.

Next thing I'm concerned about is the good farming ground. Our forefathers worked hard to acquire this land for their children, it is our duty to preserve our land. With population growing by 8 babies per minute our population growth is growing; therefore we need to keep our good land for food. My husband and son are farmers for they are just as concerned because good farming ground is in short supply, there is not anymore land being made so why ruin prime farming ground. After 20 yrs. there will be no valuation left. Please listen to the farmers they know their land.

Something else "Is this keeping America Beautiful" with this filth along the highway?

I realize there is a lot of garbage being produced everyday, but let us find a different way of disposing it. Recycling is a good start.

Mary Ann Rohl  
RR#1  
Homer, Il. 61849

# VILLAGE OF HOMER

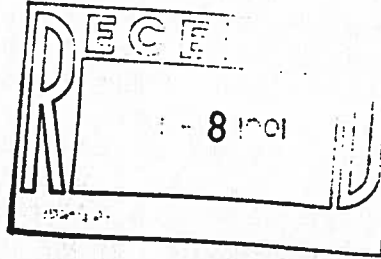
Homer, Illinois 61849

**MAYOR**  
Ernest Wienke, Jr.  
896-2167

**Village Clerk**  
Water Collector  
JoAnn Wallace  
896-2193

**Village Treasurer**  
Kristie Wright  
896-2985

January 3, 1991



**TRUSTEES**  
James Kirby, 896-2338  
Finance, Chairman

Morris Miller, 896-2120  
Streets and Alleys,  
Chairman

Dennis Roberts, 896-2277  
Water and Sidewalks,  
Chairman

Kelly Vetter, 896-2224  
Police, Health, Civil  
Defense, Chairman

Bruce Vetter, 896-2437  
Ordinances, Trees,  
St. Lights, Chairman

W.L. Smith, 896-2714  
Buildings and Grounds,  
Drainage, Chairman

To: ISWDA Board Members

Re: Champaign County Solid Waste Plan and Its Negative  
Effects Regarding the Village of Homer

Mr. James Pendowski

Mr. Lyke wrote me a letter and sent me a copy of the Executive Summary of the proposed Champaign County Solid Waste Plan asking for any comments or concerns I might have as Mayor of Homer. I'd like to begin with my comments concerning the Public Hearing. The Homer Village Board had two representatives at the Hearing on December 5, 1990, who were there to address concerns about the plan at that time. However, they did not get a chance to voice these concerns because the Hearing Officer made it very clear at the beginning of the meeting that he didn't want any "site specific" testimony given at this hearing. Therefore, these Board members did not have an opportunity to publicly state the negative impacts they felt a landfill developed in the Homer area would create. Nevertheless, as I learned later, other "site specific" testimony was allowed to be given orally by people concerned about the Bongard site, and specifics related to the choice of XL as a transfer station operator were also allowed. Everyone should have been given equal opportunity to publicly address the Board without stipulations being placed on what part of the plan could not be addressed. Also, if there were to be such stipulations they should have been upheld by the Hearing Officer who set down the rules. Instead, some people got to openly state their case to the Board, public, press, and television while the ones who obeyed the rules are resigned to writing letters which they hope will be read.

As the Mayor of Homer, I am responsible for the welfare of approximately 1500 residents. That probably doesn't seem like very many people compared to the number you represent, but these lives are very important to me. I know most of these residents by name, and where they live in town.

Because this community had enough trust in me to elect me as their mayor, I take my obligation to them very seriously. As you may recall, I sent a letter to all of the ISWDA Board members on November 22, 1990, which was hand-delivered by Mrs. Connie Messman since I wasn't able to attend the meeting that particular night. The letter stated my sincere concerns that there be sufficient water for the citizens of Homer and that drinking water be safe. The town's only source of water is local wells. As I previously wrote you, Homer has been actively involved in finding water sources even before I was elected Mayor. Homer has applied for grants in the past to help in this matter. Northern Illinois Water was a consideration until it proved to be cost prohibitive. In the past, local wells were sought in some areas around the outskirts of the town, but none were found. The Village Fire Chief wrote the Town Board a letter a year-and-a-half ago with his concern that if a major fire broke out in the downtown area or at the Homer School, there would not be enough water to put it out. These are some of the reasons why the Town Board and myself have actively been pursuing the development of additional wells. We are cautiously optimistic that we can find the water that we need to the south of town. That's why I intend to be very protective of the local water supply. Landfills leak, and the village wells are of the same status as the wells of the rural residents adjacent to the proposed landfill site. They are shallow wells dug in sand and gravel. If this particular Homer site was chosen, not only would a few rural residents be affected, but a whole town's water supply. That's what makes this site different from the others. No other site is so close to a town or its water supply. No where in your plan did I see where any provisions were made for replacement of water for the town when its well water becomes contaminated by leaking garbage. This is one major concern I have with your plan. Not only will individual homes be affected, but the drinking water at the local school, as well. It's hard to imagine that the ISWDA is willing to put a whole town's water supply in jeopardy. Your Board wasn't willing to jeopardize its own water supply, and I'm not willing to have my town's drinking water put in danger, either. Our wells are going to be thoroughly tested before any bit of garbage would go into any proposed landfill. Our water is clean and safe now, but once it shows any change, our Village Attorney would seek to make the County accountable to the approximate 1500 residents of Homer. We are aware that Urbana's landfill has shown changes already, and it has only been closed a few years. I hope the County doesn't count on contamination being some problem they might encounter in the distant future. It could come sooner than they think. As well logs will show, most of the wells in our area are in sand and gravel, so the possibility of infiltration of toxins when uncontrollable water conditions occur could

greatly decrease the time span of such pollution.

There are other valid reasons why I am concerned about the placement of a landfill near the Village of Homer. This proposed site is only two miles from town. As I have stated previously, no other site is located so close to a town. This proposed site is on a hill where the prevailing winds blow from the southwest. This would blow the stench of garbage into town anyday the wind blows. This is quite a frequent occurrence in the country. The blowing winds would produce another problem, that being blowing litter into town on the streets and on yards. I know that this would likely occur because people who lived five miles away from the Villa Grove landfill had trash blown in their fields and yards. Homer is only two miles away. As you know, blowing dust cannot be adequately controlled at a landfill when a strong wind is blowing even if operators try to sprinkle the ground. As you are aware, Rt.49 runs right next to the proposed site and with the dust blowing off that hill, visibility would be a real hazard to highway traffic. People who live in urban areas don't realize the difference between a 35-40 mile an hour wind in town where there are windbreaks, homes, and buildings compared to such a wind on a barren hill. Nothing slows it down. I'm sure the County would constantly be getting calls from the DOT, the adjacent neighbors, and myself with complaints related to blowing hazards.

Speaking of Rt.49, the garbage truck traffic will be entering and exiting right off of this heavily-trafficed highway. This is of real concern to me because our school children ride buses and drive cars back and forth to Heritage High School in Broadlands, Illinois, every school day. The piece of property selected as the proposed dumpsite sits at the base of an incline on the highway. As soon as you come over the hill, you are at the property. This could present a real threat for an increase in accidents along this stretch of roadway. During the spring and fall when slower moving agricultural vehicles are traveling down this same highway, this kind of increased traffic coming and going onto the highway definitely creates a bigger problem. Another problem pertaining to Rt.49 is the winter driving that will be encountered by garbage trucks. Along that stretch of highway where the hill is, blowing snow can drift across Rt.49 in no time at all. It is not unusual for that section to be closed at least three days or longer if the snow plows don't think it is worth trying to clear the road as long as the wind is still blowing. What is the transfer station going to do with three or more days of garbage in Champaign? The Homer site is the only

site out of the five whose transportation route is right through the Main Street of a town. First, the trucks have to move right past the Ogden Grade School where children are coming and going to school, and when they travel down the Main Street of Homer where children cross to walk or ride their bikes to school everyday. This was not the case in any of the other proposed sites. Do you think this particular site is worth increasing the risk of an accident involving any child being hit by a garbage truck?

Landfills can cause fires and explosions. I have serious concerns about whether our small local volunteer fire department could handle such an emergency. If such an accident occurred during the daytime hours, the number of available firemen is very low because most of them work out of town. Besides, as I said before, we might not even have enough water to fight a large fire unless we come up with some additional sources of water.

Finally, I would like to address a couple of economic problems which Homer would have if this landfill was sited here. First of all, if 240 acres were purchased by the County, our schools, township, and town would all lose tax money. We can't afford to lose what money we have to work with now. Also, the Town Board and myself are very concerned about keeping Homer a clean, attractive place for young families to come to raise their children, and for elderly people to enjoy retiring here. We have a doctor and a dentist in our town. This may not seem like a big deal to you, but not many small towns have either, much less both in their towns. We have an excellent IGA grocery store, hardware store, clothing store, florist, drugstore, bank, nice restaurant, bowling alley, auto parts store, two gas stations, antique shops and a barber shop in our downtown area. We have four denominations of churches in town, and the only cemetery in the U.S. which is owned by the American Legion and maintained by volunteer local veterans. We are proud of our town and have a lot to offer people who want to live in a small community. However, if a garbage dump is located only two miles outside of town, how many people will want to move into our town then? The threat of polluted water, the smell, the blowing litter, and the increased risks that go along with a landfill will not be selling points for moving to Homer. We on the Town Board are trying to help this town to grow. If, indeed, we are at the start of a recession and small town businesses have to struggle to survive, Homer merchants won't need a garbage dump trying to drown their sinking ships. They will need families moving here and staying here to keep them afloat.