



Solid Waste and RCRA Permitting

Bureau of Land/Division of Land Pollution Control

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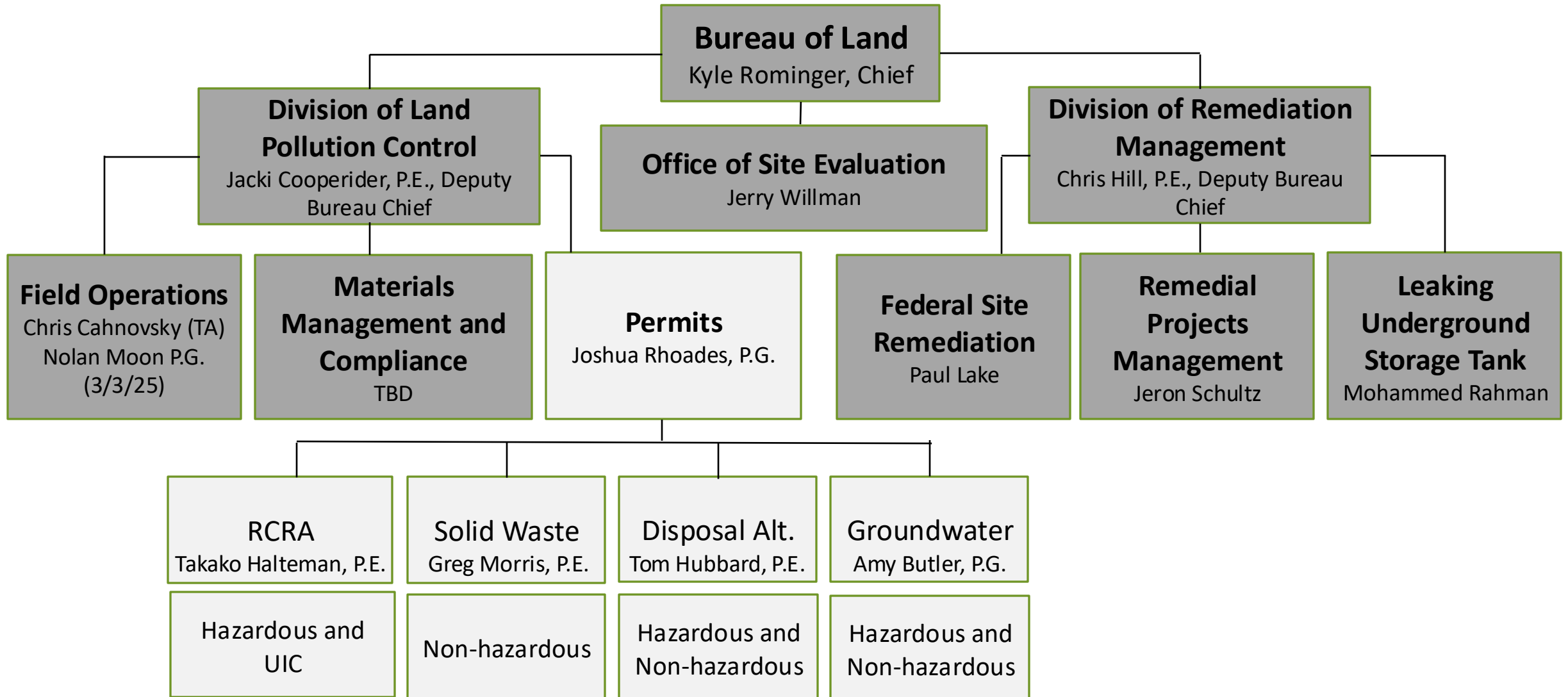
Manager, Permit Section

BOL/DLPC

FEBRUARY 27, 2025

11:00 AM – 12:00 AM

Bureau of Land - Overview



Bureau of Land - Permit Section

- Permit facilities that transfer, store, treat, and dispose of hazardous and non-hazardous waste
 - Transfer Stations
 - Landfills
 - Compost
 - Landscape Waste
 - Potentially Infection Medical Waste
 - Underground Injection Control (transfer from BOL to BOW)
 - General Construction or Demolition Debris Recovery
 - Clean Construction or Demolition Debris fill operations
 - Coal Combustion Residuals – Surface Impoundments (transfer from BOW to BOL)
- Oversee closure and corrective action activities under RCRA (hazardous waste cleanup – October 8, 2024)
- Beneficial Use Determinations (BUDs)

Learn about Hazardous Waste Cleanups

On this page:

- [What are Hazardous Waste Cleanups?](#)
- [What are Hazardous Waste Cleanup Facilities?](#)
- [The Hazardous Waste Cleanup Process](#)
- [Related Information](#)

What are Hazardous Waste Cleanups?

Cleanup (known in the regulations as corrective action) is a requirement [under the Resource Conservation and Recovery Act](#) that facilities that treat, store or dispose of hazardous wastes investigate and clean up hazardous releases into soil, ground water, surface water and air. In 1984, Congress passed the Hazardous and Solid Waste Amendments, which granted EPA expanded authority to require cleanup at permitted and non-permitted treatment, storage and disposal facilities.

New Name, Same Mission

In October 2024, EPA changed the name of its “Resource Conservation and Recovery Act Corrective Action Program” to the “Hazardous Waste Cleanup Program.” This rebranding is intended to increase broad understanding of the purpose of the program.

Permit Section Numbers

	Year	Applications/Submittals Received	Permits Issued
Non Hazardous	2024	372	404
35 Ill. Adm. Code 807, 813, 830-832, CCDD	2025 (to date)	33	34
Hazardous	2024	110	74
Part B, Closure, UIC, and CA	2025 (to date)	17	18

RCRA Permitting

Permit Renewal Summary	Total # of Permits	RCRA DAU	RCRA Unit	UIC-RCRA Unit
Illinois EPA RCRA Permits	45	13	30	2
Permit to be expired by End of FY26	23			
80% of 45 Permits	36			
# of Permits Must Issue to meet 80% Goal by FY26	14			

➤ Objectives:

➤ USEPA Performance Partnership Agreement:

- 80% of permit renewals completed by end of FY2026 (9/30/26)
- Of the remaining permit renewals (23) – 14 permits need issued
- FY25 Goal: 5 draft and 5 final (working on additional 9 draft and 6 final permits)

➤ Challenges:

➤ Staffing

- Loss of 5 staff in RCRA unit (position changes, retirements, leaving the Illinois EPA)
- Time of service:
 - <2 yrs: 7 staff (6 with <1 yr)
 - >2 yrs: 2 staff

RCRA Permitting

	CA725 (Human Exposure Under Control)	CA750 (Groundwater Releases Controlled)	CA550 (Remedy Construction)	CA800 (Ready for Anticipated Use)	CA900 (CA Performance Standards Attained)	CA999 (Process Terminated)
Totals:	143	137	110	64	47	29
FY24	93%	89%	71%	42%	49%	
Federal	19	18	14	12	4	2
Completed	76%	72%	56%	48%	24%	
State	124	119	96	71	43	27
Completed	96%	92%	74%	55%	54%	

➤ Objectives:

➤ Corrective Action (Hazardous Waste Cleanup) Progress Track:

- Annual (FY25) Commitment – 2 CA725 and 1 CA750

➤ Challenges:

- Same staff on Hazardous Waste Cleanup as RCRA Part B and UIC
- Remaining milestones become more difficult to achieve due to site complexity/history
- USEPA-led sites transferred to authorized states

RCRA Permitting

➤ Post-Closure Care:

- Reviewing and evaluating post-closure status and financial assurance liability for hazardous waste management units.
- Rolling 30-year post-closure care cost estimate
 - Based on:
 - Leachate generation
 - Nature of waste in the landfill
 - Unit type/design
 - Landfill gas generation
 - Long term care (Long Term Stewardship)
 - Climate Change Considerations
 - Documents include:
 - USEPA - Guidelines for Evaluating the Post-Closure Care Period for Facilities under Subtitle C of RCRA (December 15, 2016)
 - ASTSWMO Position Paper: Post-Closure Care Beyond 30 Years at RCRA Subtitle C Facilities (July 20, 2022)
 - Hazardous waste, as long as it is present on site, is subject to Long Term Stewardship requirements
- Updates to facility's RCRA Post-Closure Care Plan
 - Modified to address current and future environmental concerns
 - Documents include:
 - USEPA - Implementing Climate Resilience in Hazardous Waste Permitting Under RCRA (June 5, 2024)
- Appeals on decision to extend 30-years of post-closure and costs/financial assurance



➤ Long Term Stewardship (LTS):

➤ Hundreds of sites completed remediation under RCRA

- Clean closed
- Clean closed with some land use restrictions
- Waste-in-place with post-closure care

➤ 800 logs reviewed

- 74 RCRA closed sites with some controls in place

➤ LTS Database and GIS Mapping

➤ Tracks ICs and engineered barriers in addition to pre-TACO legacy restrictions (Deed Restrictions)

- ICs: ELUC, Highway Authority Agreement, MOU, Ordinance or deed restriction, etc.)

- Provides type of engineered barrier

➤ GIS will assist in future compliance inspections

➤ Future Work:

- Include future RCRA closures, hazardous waste clean up sites, hazardous waste landfills in post-closure care (may be released but required to continue maintenance under UECA

- LTS is one of the primary goals of the USEPA RCRA program and this information at closure/NFA aligns with RCRAInfo.

RCRA Permitting

Long-Term Stewardship Data

BOL RCRA - Long-Term Stewardship Data

LTS FOS Inspections (Cs Engineered Barriers & Other Restrictions)

Long Term Stewardship Sites - FOS Inspections Institutional Controls, Engineered Barriers, and Other Restrictions

Open Data Sheet

Tuesday, December 31, 2024

Champaign	1150150025	Bridgestone Firestone Inc	2500 N 22nd St	PO Box 1320 Decatur	62525-14
C-530-M-15	RCRA Closure	Date of NFA: 11/15/2002	Groundwater Class: Class I	IC Acres: 0	
Institutional Controls					
<input type="checkbox"/> Ordinance	<input type="checkbox"/> Deed Restriction	<input type="checkbox"/> EB Building/Structure	<input checked="" type="checkbox"/> Concrete	<input checked="" type="checkbox"/> Industrial/Comm LandUse	<input type="checkbox"/> Buildings Require Vapor
<input checked="" type="checkbox"/> ELUC	<input type="checkbox"/> LUCMOA	<input type="checkbox"/> EB Concrete Base	<input type="checkbox"/> Gravel	<input type="checkbox"/> Worker Caution	<input type="checkbox"/> Concrete Base, Sumps Prohibited
<input type="checkbox"/> HAA	<input type="checkbox"/> MOU/MOA	<input type="checkbox"/> Sumps Prohibited	<input type="checkbox"/> Soil Cov 3ft	<input checked="" type="checkbox"/> Groundwater Use Restriction	<input type="checkbox"/> EB Buildings Require Vapor Mitigation
<input type="checkbox"/> HAAMOU		<input type="checkbox"/> EB Buildings Require Vapor Mitigation	<input type="checkbox"/> Soil Cov 10ft Inhalation	<input type="checkbox"/> Soil_Management_Restrict	<input type="checkbox"/> No Contaminated Soil or GW w/in 5ft of Bldg
Other_IC:		<input type="checkbox"/> Asphalt	<input type="checkbox"/> Soil Cov 10ft for Inhalation Ingestion	<input type="checkbox"/> New Buildings Prohibited	

Champaign	0390050004	Corning Consumer Products Co	1000 S Sherman St	PO Box 250 Clinton	61727
C-644-CFRT	RCRA Closure	Date of NFA: 9/17/2012	C-441 C-577 C-301 C-126	Groundwater Class: Class I	IC Acres: 52.54

General Reports

- Sites w/ Instit Controls
- NFAs Prior to TACO (1996)
- NFAs Pre-TACO Vapor Intrusion Rules 7-2013
- All Facilities in LTS Database
- FOS LTS Sites w/ICs, EBs, Other

Other Reports

- Log Number

Underground Injection Control

➤ Five Classes

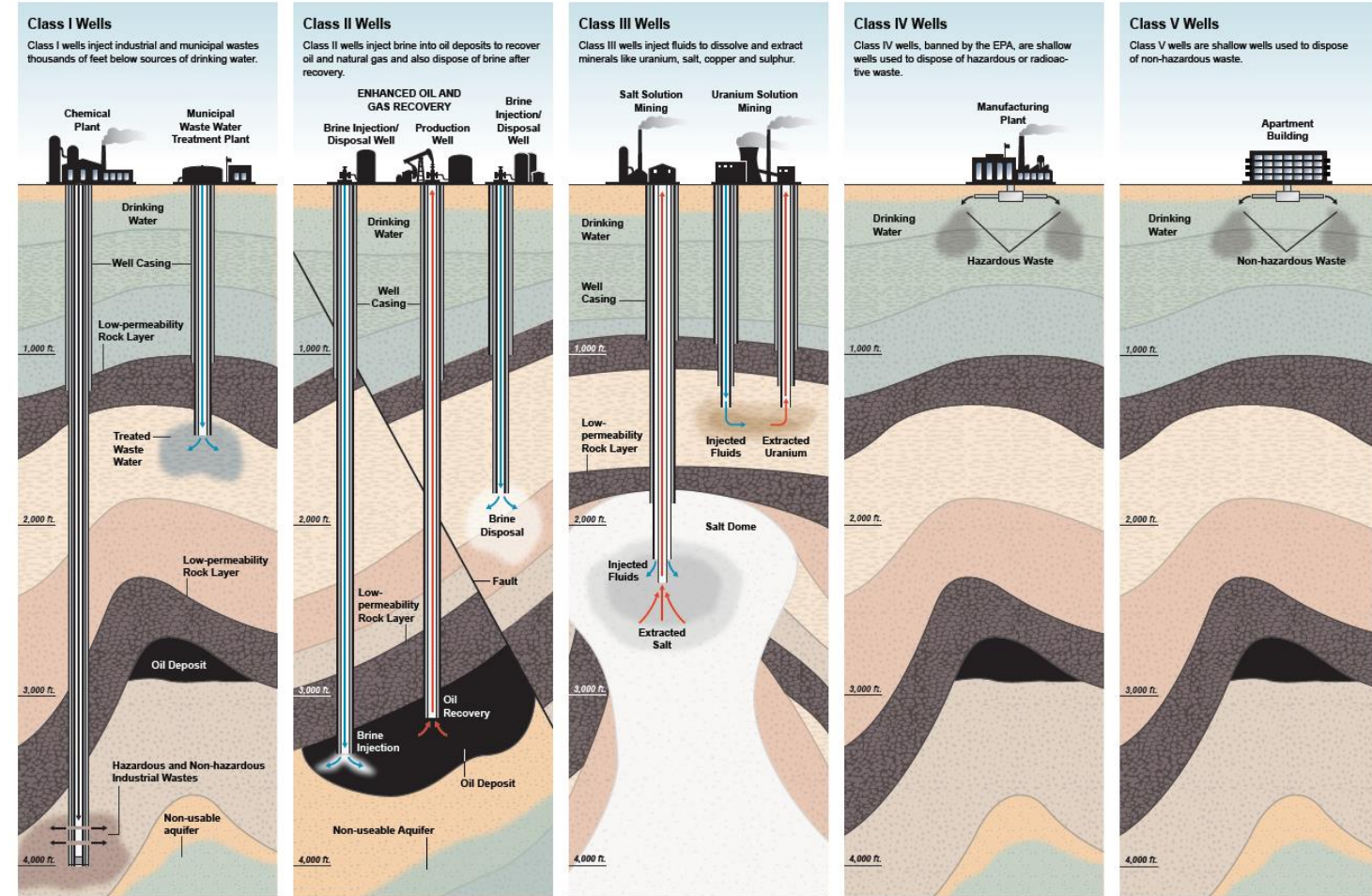
➤ Illinois permits Class I and V

➤ Transition from Bureau of Water to Bureau of Land

➤ Consistent with BOW programs in other states

Class I	Wells injecting hazardous or non-hazardous waste below the lowest Underground Source of Drinking Water (USDW). Class I wells are commonly referred to as the deep wells. Presently there are four Class I wells operating in Illinois.
Class II	Wells injecting fluids associated with production, storage and recovery of oil and natural gas. In Illinois the Class II Program is administered by the Illinois Department of Natural Resources, Office of Mines and Minerals.
Class III	Wells used to extract minerals following the injection of fluids into an ore bed such as uranium. No Class III wells exist in Illinois.
Class IV	Wells used to inject hazardous waste into or above a USDW. Class IV wells are banned by regulation.
Class V	Wells used to inject non-hazardous waste into or above a USDW. Class V wells are commonly referred to as the shallow wells. This is the largest class of injection wells with over 6000 Class V wells in Illinois alone.

Classes of Injection Wells





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Coal Combustion Residuals – 35 Ill. Adm. Code Part 845

- National Universe
 - 25% in Region 5
 - Illinois has the highest number in Region 5
 - Currently 23
- Federal Rules
 - USEPA adopted rules expanding the CCR program to include additional CCR units other than surface impoundments
 - Illinois expected to follow suit
- Transition from Bureau of Water to Bureau of Land
 - Provide alignment with organization of the CCR program at the Federal level.

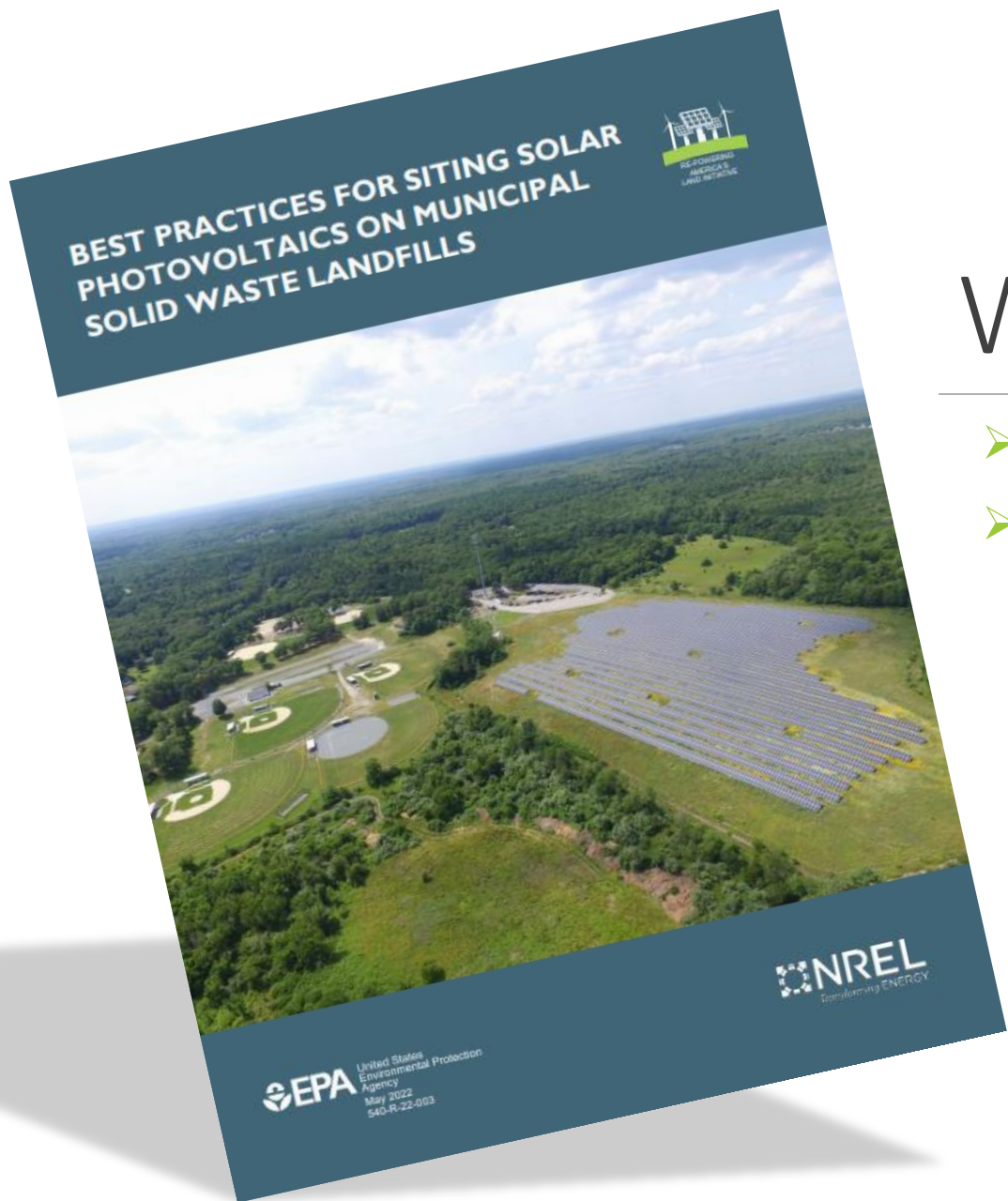
Database Updates and Electronic Submittals

Environmental Information Management System

Replace antiquated databases

- Lack ability to communicate with federal databases
- Redundancy in data management/inputting
- RCRA Translator

Groundwater Database



Wrapping Up

- Non-hazardous solid waste landfills exiting post-closure care
- Post post-closure care land use
 - Solar arrays
 - Generally Requires:
 - Description of foundations or anchorage
 - Demonstration the installation, operation, and maintenance of the system will not compromise environmental and control systems (e.g. final cover system)
 - Updated plan for inspections of final cover system
 - Settlement and stability analysis to not adversely affect final cover and overall landfill mass
 - Take into account dead load and wind and snow loadings
 - Updated post-closure care plan
 - Updated surface water control system
 - Private use (livestock grazing, structure development, etc.)

Thank You!

“The mission of the Illinois EPA is to safeguard environmental quality, consistent with the social and economic needs of the State of Illinois, so as to protect health, welfare, property, and the quality of life.”



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217-524-0080