



From: [Commenter 2's Representative]
Sent: Monday, February 18, 2019 4:41 PM
To: Illinois-RFP <Illinois-RFP@nera.com>
Subject: Add that any landfill ever permitted by the Illinois EPA is eligible

Hi,

Public Comments:

1. Yes, this definition is too restrictive. According to the Illinois Environmental Protection Agency, there are 3,430 legacy landfills in Illinois. Many of these landfills were operated and closed before the State had landfill regulations, or were closed so long ago that they no longer have any active permit through the programs listed. That is to say, they are post post-closure. Additionally, it is generally not feasible to enter these properties into the Site Remediation Program or other remediation programs. It seems reasonable that any site that ever had a waste disposal permit from Illinois EPA meets the general understanding of a brownfield and should be eligible for a Brownfield incentive. Additionally, there may be closed legacy landfills that pre-date any government permitting that nonetheless meet the general understanding of a brownfield.
2. Landfills have been operated and subsequently closed for at least one hundred years. These sites clearly meet the general understanding of a brownfield. [Commenter 2] closed a landfill in 1988, 30 years ago. This landfill received a Certification of Completion of Post-Closure Care in 1996, 22 years ago. Most of this property is still managed as a closed landfill with vegetation management and leachate collection. The various landfill cells in [Commenter 2] had separate Illinois EPA permits at one time or another. It seems reasonable that any site that ever had a waste disposal permit from Illinois EPA meets the general understanding of a brownfield and should be eligible for a Brownfield incentive.
3. Sections i., ii., and iii. are too onerous for closed legacy landfills. Consider adding that any landfill ever permitted by the Illinois EPA is eligible.
4. No comment.
5. No comment.
6. No comment.
7. 
8. 

Thanks!

[Commenter 2's representative contact information]