

The County of Will
Land Use Department
Solid Waste Division



Will County, Illinois

**Solid Waste
Management Plan
Update**

March 1996

HDR Engineering, Inc.

HDR

WILL COUNTY
SOLID WASTE MANAGEMENT

PLAN UPDATE

March 1996

Charles R. Adelman
Will County Executive

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Prepared By:

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- * These names from the original 1991 Committee are dropped from this list because they are either deceased or no longer an elected official.

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WILL COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

MARCH 1996

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Executive Summary

EXECUTIVE SUMMARY WILL COUNTY SOLID WASTE MANAGEMENT PLAN UPDATE

March 1996

In January 1991, the Will County Board adopted the Solid Waste Management Plan prepared pursuant to the Illinois Solid Waste Planning and Recycling Act (415, ILCS 15/1 et seq.). Implementation of the 1991 Plan began immediately following adoption. The Act also requires that "each County Waste Management Plan shall be updated and reviewed every 5 years, and any necessary or appropriate revisions shall be submitted to the Agency for review and comment." The purpose of this document (Plan Update) is to meet the requirement for this five-year update.

The 1991 Plan consists of seven volumes. The technical report volumes generally corresponded to the State's hierarchy of solid waste management alternatives: volume reduction, recycling and landscape waste composting, combustion with energy recovery, combustion for volume reduction, and landfilling. The analysis and conclusions reached in these technical reports remain unchanged in this Plan Update.

Legislative changes have occurred since the adoption of the 1991 Plan. These included landfill bans of the following materials: whole tires, lead acid batteries, and white goods unless CFC gases are removed. Other legislation provided references and clarifications to solid waste laws in effect prior to 1989. For example, 65 ILCS 5/11-19-1 as amended allows municipalities to enter into long-term, waste-related contracts. There have also been significant changes in flow control authority. As a result, the flow control recommended in the 1991 Plan has been revised to no "flow control" for the County Solid Waste Management System in this Plan Update. These developments have influenced the changes in recommendations which appear in the Plan Update.

The Plan Update incorporates new population projections to update the solid waste generation and subsequent disposal needs during the planning period 1996 to 2020 for the expanded Will County Service Area, not only the corporate limits of Will County. The Will County Service Area includes all 24 townships and all 35 municipalities that are either fully or partly within Will County. Based upon these projections, an average of about 926,000 tons per year, without recycling, will be generated in the Will County Service Area (see Table 7 of the Plan Update). Assuming an approximate recycling rate of 25 percent, about 700,000 tons per year of total solid waste will require disposal from the Will County Service Area over the planning period. Details about waste generation rates, assumptions of population growth and recycling rates can be found in the Plan Update document.

The solid waste generated is collected and managed at several facilities located in Will County. Municipal solid waste is collected by any one of 20 private haulers currently operating in the County. The Plan Update continues to recommend that residential waste collection be franchised in the few remaining municipalities who do not franchise hauling and in the unincorporated areas. Curbside recycling services by haulers have significantly expanded since the 1991 Plan from only eight communities to 23 communities in 1995. Recycling drop off centers are operating in 14 locations. Furthermore, the County has actively supported commercial recycling, yard waste composting, and land application of yard waste and, as a result, commercial recycling is occurring at three transfer stations (soon to be four), yard waste composting at four permitted facilities and land-application at three farms. A material recycling facility in Plainfield also serves Will County plus portions of neighboring DuPage County. The County is currently ahead of its recycling goals. These recycling services and facilities and other recycling programs supported by the County in the recommendations will continue.

Municipal solid waste not recovered and recycled is presently disposed at either the Beecher Development Unit III or the new CDT Landfill. One other landfill permitted to accept MSW is temporarily closed, and another two landfills only accept ash and/or special waste. Five sanitary landfills have closed since the 1991 Plan. As a result, additional disposal capacity will be required by 1997 at the earliest.

The 1991 Plan recommended several alternatives to manage municipal solid waste in Will County, beginning at the top of the hierarchy. The following identifies the recommendations for the Solid Waste Management System from the 1991 Plan including any revisions for this Plan Update:

Source Reduction

- Continue to support the programs implemented to achieve five percent source reduction goal.
- Build waste disposal costs and recycled feed stock preference into bid considerations. However, bidders are reluctant to support such requirements and, therefore, these programs will be discontinued.
- Continue to conduct promotional and educational campaigns in grade schools.
- Conduct educational campaigns for businesses and institutions. This has not produced expected results and, therefore, will be discontinued.
- Continue to support the two-sided copying policy at all county copying facilities.
- Create and staff a source reduction information source for County residents, businesses and institutions. Staffing was not created and is not likely to be created, therefore, program will be discontinued.
- Work with the Three Rivers Manufacturers Association to provide waste stream audits. Due to low staffing levels, this program has not been accomplished and is not likely to be accomplished.

- Encourage municipalities to implement a volume or weight based solid waste collection. The municipalities have not implemented this program and, therefore, it will be left voluntary for municipalities to implement.
- Continue to support the Volume Reduction/Recycling Grant Programs, Wilmington Model Community, and Information Clearinghouse program, all of which have been implemented. The County surcharge on landfill tipping fees will continue to fund these programs. However, a separate volume reduction/recycling fund for these programs will not be established.

Recycling and Landscape Waste Composting

- Support the ongoing activities of the public education program.
- Continue to assign recycling education responsibilities to one or more trained staff people.
- Support the ongoing activities of the technical assistance program.
- Continue the activities of the Volume Reduction/Recycling Grant Program. Grant Program had required grant recipients to maintain records of volume and material recycled. Without legislative authority it is difficult for the County to enforce, therefore, the recordkeeping requirement will not be enforced.
- Continue to encourage elected officials to support recycling programs.
- Continue the office paper collection program, and expand the government implementation program to include beverage containers from lunchrooms and recycling of construction and demolition materials through highway reconstruction programs.
- Encourage municipalities to implement economic incentives and disincentives for residential waste collection and buy-back programs for difficult to handle materials. The municipalities did not implement the pay by the bag incentive or buy-back program. The buy-back program was not implemented because private industry is keeping these materials out of landfills.
- Continue the ongoing demonstration programs such as the Wilmington Model Community, the highway reconstruction and recycling of construction and demolition debris, and the expansion of the program to corrugated recycling, beverage container recycling, and office paper recycling.
- Continue to prepare general-use materials. The County has developed recycling brochures for use by municipalities, townships and individuals, and will continue to do so.
- Continue to support site approval activities for recycling and composting facilities. A siting process for unincorporated areas has been developed.
- Continue to provide technical assistance in market development.

Household Hazardous Waste

- Conduct three household hazardous waste drop-off programs annually. The Plan Update revises this to conducting at least one household hazardous waste drop-off annually through the County's landfill contract, and two more through IEPA's funding.
- Support household hazardous waste educational and awareness program. This is a part of the reduction/recycling education program to schools and public.

Incineration with Energy Recovery

- Do not include incineration with energy recovery at this time due to economic reasons. The conditions which affect the cost have changed somewhat for this Plan Update. Additional requirements for air pollution control and testing incinerator ash have added to the costs.
- Re-evaluate the economic viability of incineration with energy recovery at the next update, if the County's proposed landfill does not materialize.

Incineration for Volume Reduction

- This is not a part of the Plan Update because of economic reasons.

Landfilling

- Prepare a site selection process for siting a sanitary landfill. The site selection process had been implemented and resulted in selection of a site on the Joliet Arsenal.
- Continue to support the legislative transfer of ownership of the selected site to the County. The County has always intended to own the landfill site.
- Develop a sanitary landfill with the private sector as available disposal capacity in the County diminishes. Request for Proposals to private contractors to design, finance, permit, construct and operate a landfill facility have been issued. Contractor is expected to be selected by the end of 1995 or early 1996.
- Continue to conduct the County Groundwater Sampling Program. Although this program was not mentioned in the 1991 Plan, testing has been conducted over the last five years and will continue.
- Support the use, development and/or expansion of one or more in-County landfills to provide the County with interim waste disposal capacity as the siting and permitting process for the County landfill is ongoing.

With the development of a County landfill, one or two more transfer stations are expected to be necessary in the northern and eastern portion of the County. The transfer station(s) will be developed by the private sector.

The solid waste agreement for use between the municipalities and the County has not yet been finalized or executed by any municipalities in the County. The solid waste agreement does not commit the flow of recyclables to a specified processing facility.

Municipalities and townships will be free to join the system or not to join, or to discontinue participation with one year written notice without penalty. Regulatory flow control of waste will not be imposed on the system. This Plan Update also eliminates the creation of a policy board composed of municipal, County, and township representatives, which was mentioned in the 1991 Plan. The policy board was to be created as part of the Solid Waste Agreement to advise on the siting, financing, permitting, and designing of the proposed County landfill. Since the proposed landfill will not only be constructed and operated by a private contractor, but also designed, financed and permitted by the private contractor, the policy board will not be created. The proposed landfill will be completely privatized except for County ownership of the land. Solid waste agreements are expected to be finalized and executed sometime after the award of the landfill contract.

Interim and final facilities should be economically beneficial (i.e., the implementation of an appropriate host benefit fee) and environmentally sound for the County. The system will include interim landfill capacity which may be provided by facilities already located within Will County until the County's proposed landfill is operational. The Final Landfill will have a minimum 20-year life. The private operator will be required to have adequate insurance to indemnify the County, and the participating townships and municipalities from environmental liabilities. Also, the system is anticipated to charge participating townships and municipalities a lower tipping fee. The facility will be designed to primarily take care of the waste disposal needs of the Will County Service Area. The Landfill operator will be allowed to receive waste from outside the Will County Service Area provided that at least twenty (20) years of capacity is guaranteed to meet the waste disposal needs of the Will County Service Area and the contractor does not exceed the annual waste receipts imposed by the County.

IEPA's Plan Update Form

A completed form is attached to this executive summary on the following pages.



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

FIVE YEAR MUNICIPAL WASTE MANAGEMENT PLAN UPDATE

The Agency has prepared this form to assist local governments with the five year updates of municipal waste (MW) plans. Although local governments may prepare and submit a more extensive document, the Agency will consider submission of this completed form to be the plan update required under the Solid Waste Planning and Recycling Act (SWPRA).

Attach additional labelled pages as necessary.

GENERAL INFORMATION

Local Government: County of Will

Contact Person: Narayan Kedare, PE, Director, Waste Services Division

Address: Will County Land Use Department
501 Ella Avenue
Joliet, IL 60433

Telephone: (815)727-8834 Plan Adoption Date: 1/17/91

Re-Adoption Date: None Plan Update Due: 1/17/96

1. Recommendations and Implementation Schedule Contained in the Adopted Plan

This information should be easily accessible in the plan's Executive Summary or Recommendations chapter. Briefly describe the recommendations and implementation schedule for each alternative in the adopted plan below.

a. Source Reduction

See Executive Summary and Section IX of the Plan Update (pg 19-21) and
Section X - Household Hazardous Waste.

b. Recycling and Reuse

See Executive Summary and Section IX of the Plan Update (pg. 21-25).

c. Combustion for Energy Recovery

See Executive Summary and Section IX of the Plan Update (pg. 25-26).

d. Combustion for Volume Reduction

The County determined that combustion for volume reduction was prohibitively expensive, and thus would not be considered further.

e. Disposal in Landfills

See Executive Summary and Section IX of the Plan Update (pg. 27-28).

2. Current Plan Implementation Efforts

a. Which recommendations in the adopted plan have been implemented?

See Executive Summary

Briefly describe which recommendations were not implemented and the reasons why these were not implemented.

See Executive Summary. Recommendations have either been implemented and discontinued or not implemented due to lack of staffing, funding and interest.

b. Which recommendations in the adopted plan have been implemented according to the plan's schedule?

See Executive Summary. Almost all recommendations were implemented following adoption of the 1991 Plan.

Briefly describe which recommendations were not implemented according to the adopted plan's schedule, and attach a revised implementation schedule.

The County landfill has not been implemented according to Schedule.

See #5 for new schedule. The HHW drop-off day was not implemented until 1994.

3. **Recycling Program Status**

Because the Agency's annual landfill capacity report includes data on each adopted plan's recycling status, information on your recycling percentages is not being requested on this form. This will avoid duplication of efforts.

- a. Has the program been implemented throughout the county or planning area?
yes ☒ no ☐
- b. Has a recycling coordinator been designated to administer the program?
yes ☒ no ☐ If yes, when? 1/17/91
- c. Does the program provide for separate collection and composting of leaves?
yes ☒ no ☐
- d. Does the recycling program provide for public education and notification to foster understanding of and encourage compliance with the program?
yes ☒ no ☐
- e. Does the recycling program include provisions for compliance, including incentives and penalties?
yes ☒ no ☐ If yes, please describe.

The recycling grants are available as incentives with penalty clauses in the contract in the event that goals are not met.

- f. Does the program include provisions for recycling the collected materials, identifying potential markets for at least three materials, and promoting the use of products made from recovered or recycled materials among businesses, newspapers, and local governments?
yes ☒ no ☐ If yes, please describe.

See Section IX of the Plan Update (pg. 21-25) and Executive Summary.

g. Provide any other pertinent details on the recycling program.

The County has three land application farms, four operating compost facilities, white goods recycling at transfer stations, commercial recycling at transfer stations, C/D waste recycling for highway reconstruction, and has awarded recycling grants over \$500,000 in the last five years. (See Section IX of the Plan Update for more detail.)

4. Current Needs Assessment Information (optional) See Sections III and V of the Plan Update.

Depending upon the available resources, updated waste generation data, current municipal waste recycling and disposal information, and any other recent available data may be included; this information will not be required by the Agency.

a.	MW generated per year:	_____	tons	_____	cubic yards
b.	MW generation rate:	_____	pcd	(lbs/capita/day)	
c.	MW recycled/year:	_____	tons		
d.	MW incinerated/year:	_____	tons	_____	cubic yards
e.	MW landfilled/year:	_____	tons	_____	cubic yards
	Time period for this information:	_____			

5. New Recommendations and Implementation Schedule

Due to political, fiscal, or technological changes, a local government may choose to recommend different waste management options for the revised plan. It should be noted, however, that the recycling program requirements of the SWPRA must be followed. Discuss any new recommendations included in the revised plan, and the implementation schedule to be followed.

There are no technological changes in the Plan Update. The County landfill will be a public/private partnership. The following implementation schedule is anticipated: siting, designing and permitting - 1996 to 1998; operations - 1999 to 2018 (min. 20 years). One or two additional transfer stations (private) are anticipated with the implementation of the landfill.

The transfer station schedule is similar to the landfill schedule.

Incineration is still not economically feasible for the County and therefore not recommended. Finally, no additional compost facilities are planned, as there are adequate compost facilities in the County by the private sector.

Section I - Legislative Framework

In January 1991, the Will County Board adopted the Solid Waste Management Plan (Plan) prepared pursuant to the Illinois Solid Waste Planning and Recycling Act (415, ILCS 15/1 et seq.) which took effect on January 1, 1989 (Act). The Plan met the content, public notification and participation requirements of the Act.

The Plan consists of seven volumes as follows:

Volume I	-	Solid Waste Management Plan
Volume II	-	Generation Rates Update
Volume III	-	Volume Reduction
Volume IV	-	Recycling and Landscape Waste Management
Volume V	-	Waste to Energy Feasibility Study
Volume VI	-	Landfill/Ashfill
Volume VII	-	Public Comments and Responses (January 1991)

Implementation of the Plan began immediately following adoption.

The Act also requires that "each County waste management plan shall be updated and reviewed every 5 years, and any necessary or appropriate revisions shall be submitted to the Agency for review and comment." The purpose of this document (Plan Update) is to meet the requirement for this five-year update.

This document follows the format and organization of the 1991 Plan, Volume I. Each of the thirteen sections of the Plan have been updated and revised as necessary in this Plan Update. Where no changes are required, the language in the Plan remains unchanged in the Plan Update. Public comments and the County's responses are included in this document as an Attachment.

Legislative changes which have occurred since the passage of the Act and the adoption of the Plan include Acts which ban from landfills in Illinois: whole tires (July 1, 1994), lead acid batteries (September 1, 1990), and white goods, unless CFC gases are removed (July 1, 1994). Other legislation provided refinements and clarifications to solid waste laws in effect prior to 1989. For example, 65 ILCS 5/11-19-1 as amended allows municipalities to enter into long-term, waste-related contracts.

Section II - Chronology of Will County Planning Documents

The County's solid waste planning efforts began in September 1974 with the development of an Interim Solid Waste Disposal Plan for Will County. The document included a general discussion of disposal needs in the County and estimates of solid waste generation using national per capita data. The plan recommended a network of facilities to serve sub-county regions. The plan's goal was to minimize disposal costs by minimizing transport distances. In 1974, transport costs were seen as the controlling

force of disposal costs. The strengthening of regulatory requirements for solid waste disposal since 1974 and the resulting increase in solid waste management costs, have made the sub-county approach less desirable.

In 1982, the Will County Development Department (the predecessor to the current Land Use Department) prepared the Draft Waste Management Element. In that draft plan, areas of the County most suitable for waste disposal were mapped.

Shortly thereafter, the Development Department began work on what became a draft Will County Waste Disposal Management Plan. The draft plan generally discussed the types and quantities of solid waste generated in the County. It projected the remaining capacities of disposal facilities in the County, discussed possible disposal options, and then established eight criteria to define unsuitable areas for the land disposal of solid waste in the County. The draft plan concluded with a set of public policy and planning recommendations, many of which have been fully or partially realized. A public hearing was conducted in early 1986 to gather comments on the draft plan. Based on the public comments and other factors, the draft plan was tabled, and never presented to the Will County Board for its consideration.

The County did though, continue its solid waste management planning efforts. The County applied for and received a grant from the Illinois Environmental Protection Agency (IEPA) for the completion of a Phase I and partial Phase II plan as defined by the Agency. The County contracted with Envirodyne Engineers for the development of the Will County Interim Solid Waste Management Plan. This Interim Plan, adopted by the Will County Board in December of 1988, updated the estimates of solid waste generation in the County, presented collection practices, considered disposal alternatives, inventoried existing disposal facilities, and recommended policies and actions for a more detailed analysis of disposal options and implementation for the County. The Interim Plan also discussed requirements for new or expanded facilities proposed for the County.

The Interim Plan was prepared under the enabling provisions of the Local Solid Waste Disposal Act (415 ILCS 10/1 et seq.). The Solid Waste Planning and Recycling Act (415 ILCS 15/1 et seq.) became effective shortly after the completion of the Interim Plan. To meet the requirements of the Solid Waste Planning and Recycling Act, and to carry out the recommended actions of the Interim Plan, the County continued its planning efforts. The 1991 Plan was the result of those efforts. This Plan Update continues the planning process by updating the elements of the 1991 Plan.

A set of revised planning guidelines developed by the County for the Plan Update guided these planning activities. These guidelines, included as Attachment 1, were mailed to the members of the Municipal and the Technical Advisory Committees for their review and comments. The comments and the County's responses are included in Attachment 3. The County has contracted with HDR Engineering, Inc. to prepare this Plan Update.

This Plan does not address the management of wastes classified within the State or Federal regulatory systems as hazardous, nuclear or medical wastes.

Section III - Generation Rates

Most of the major elements of the 1991 Plan will remain unchanged. However, the Plan Update incorporates new population projections to update the solid waste generation in Will County for 1996 to 2020. The following discussion identifies the waste generation rates, population and waste generation.

Waste Generation Rates

The formation of solid waste generation rates were discussed in the 1991 Plan, Volume II. The waste generation rates developed for the 1991 Plan will continue to be utilized in forecasting the solid waste generation in Will County for the 25 year planning period 1996-2020. No analysis of the present validity of the waste generation rates will be completed in this Plan Update. Table 1 shows the generation rates which were developed for the 1991 Plan. The waste generation rates are presented in pound per capita per day (pcd) or pounds per employee per day (ped).

Table 1
Will County Waste Generation Rates¹

Sector	Waste Generation Rate
Residential	2.8 pcd
Commercial	1.2 pcd (6.5 ped)
Construction/Demolition	<u>0.72 pcd</u>
Municipal Solid Waste	4.72 pcd
Industrial	<u>1.1 pcd</u> (14.6 ped)
Total Waste	5.82 pcd

Note:

¹ Source from Volume II: Generation Rates Update, July 1990, by Patrick Engineering Inc.

The IEPA Eighth Annual Report *Available Disposal Capacity for Solid Waste in Illinois* has a municipal solid waste generation rate of 5.7 pcd based upon a 1995 survey of recycling coordinators. However, since the total generation rate developed by Patrick Engineering (5.82 pcd) provides for a more conservative landfill sizing criterion, these numbers from the 1991 Plan will be utilized in this Plan Update.

The waste generation rates are assumed to remain relatively constant during the forecast period as in the original Plan. Changes in waste generation rates are difficult to predict due to the many factors that influence waste generation. Nevertheless, some solid waste reports utilize increases in waste generation rates for their projections. The *Characterization of Municipal Solid Waste in the United States, 1960-2000: 1992 Update* by Franklin Associates estimates that national average per capita generation of municipal solid waste will increase at 0.45 percent annually. In Will County, however, landscape waste managed on-site and other source reduction activities are assumed to mitigate any increases. Assuming a constant per capita generation rate provides a reasonable compromise between the historical trends for increases in waste generation and recent reductions in waste generation due to volume reduction measures.

The above waste generation rates do not account for any changes that may have occurred during the past five years regarding the economy, household income, household size, purchasing habits, changes in packaging industry, societal values and source reduction in the residential, commercial and industrial sectors. However, net changes in per capita rates over the past five years due to these factors are likely to be small.

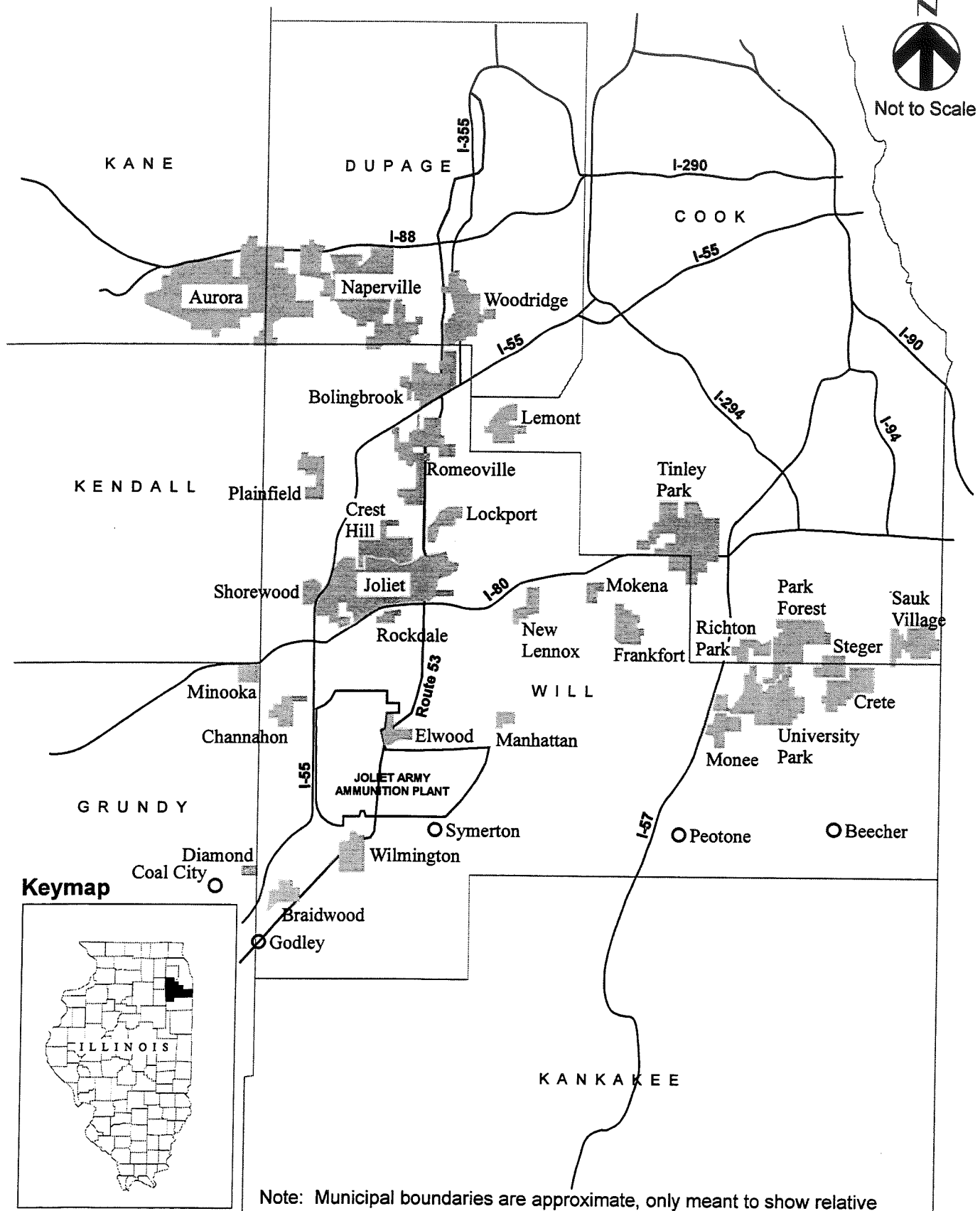
Population and Employment

The 1991 Plan was based upon demographic information from the 1988 Census Bureau and the Northeastern Illinois Planning Commission's (NIPC) Data Bulletin 88-1. In 1990, the County's population was estimated to be 356,055, increasing at an annual rate of 1.147 percent to 473,486 in 2015 (Volume II, p. 5). Industrial employment was estimated to remain constant at 25,500 employees; commercial employment was estimated to increase at an annual rate of 1.091 percent from 65,160 employees in 1990 to 85,460 employees in 2015.

An Interim 1994 Forecast Allocation Population, Household and Employment Results prepared by the NIPC Research Services Department, October 1994, identified the County population as 357,301 based on the 1990 U.S. Census data. In 2010, the County population is estimated to be 493,344. This suggests that Will County will be growing at a more rapid rate than originally projected in the 1991 Plan. Furthermore, the County wishes to include all of the population of the municipalities bordering Will County (the Will County Service Area) for the waste generation estimates in this Plan Update. Figure 1 shows the Will County Service Area. The 1990 population of the Will County Service Area, was 654,904 as shown in Table 2.



Not to Scale



Note: Municipal boundaries are approximate, only meant to show relative size and location.



HDR Engineering, Inc.

Will County Service Area



Solid Waste Management Plan Update
The County of Will
Land Use Department, Solid Waste Division

Date

Mar. 1996

Figure

1

Table 2
Will County Service Area Population¹

Municipality	1990 Census Population²	Municipality	1990 Census Population²
Aurora*	99,556	Monee	1,044
Beecher	2,032	Naperville*	85,806
Bolingbrook*	40,843	New Lenox	9,698
Braidwood	3,584	Park Forest*	24,656
Channahon	4,266	Peotone	2,947
Coal City*	3,907	Plainfield	4,557
Crest Hill	10,999	Richton Park*	10,523
Crete	6,773	Rockdale	1,717
Diamond*	1,077	Romeoville	14,101
Elwood	951	Sauk Village*	9,926
Frankfort	7,180	Shorewood	6,264
Godley*	323	Steger*	8,592
Joliet	77,217	Symerton	110
Lemont*	7,359	Tinley Park*	37,115
Lockport	9,401	University Park	6,204
Manhattan	2,059	Wilmington	4,743
Minooka*	2,563	Woodridge*	26,359
Mokena	6,128		
		Unincorporated Will County	114,324
	Total		654,904

Notes:

¹ Data from Northeastern Illinois Planning Commission publication.

² Certified 1990 Census, U.S. Census Bureau.

* Municipalities bordering Will County, with population partially in Will and other counties.

According to NIPC, the next complete revision of area population projections to the year 2020, by municipality, will be issued sometime in the spring of 1996. Consequently, the population projections and growth rates from the *Interim 1994 Forecast* will be used in conjunction with the 1990 Census municipality data to forecast population for the planning period 1996-2020. Table 3 identifies the annual population growth rates through the year 2020 calculated based upon the *Interim 1994 Forecast* data.

Table 3
Anticipated Annual Population Growth Rates

Years	Annual Increase in Population¹
1990-2000	1.044%
2001-2010	2.211%
2011-2020 ²	1.626%

Notes:

¹ Calculated from NIPC, *Interim 1994 Forecast Allocation Population, Households, and Employment Results* for Will County.

² Based on the average annual population increase in Will County projected over 1990-2010.

Using the above annual increases, the total service area population from Table 2 can be projected through the year 2020. Table 4 presents five year population projections for the Will County Service Area as compared to the population within the corporate limits of Will County only. Including the entire population of the border municipalities almost doubles the population base.

Table 4
Will County Population Projections: 1990-2020

Year	Will County Service Area	Will County Only
1990	654,904	357,301
1995	689,811	376,860
2000	726,602	396,418
2005	810,578	444,881
2010	904,260	493,344
2015	980,217	534,784
2020	1,062,554	579,706

The 1991 Plan also utilized employment data to project waste generation. Employment data for Will County can be obtained from either the NIPC, summarized into six major industry categories, or the Illinois Department of Employment Security (IDES), summarized by industry. Each provide employment projections. In the 1991 Plan, manufacturing employment was projected to decline while the other employment sectors, especially retail and services, were expected to increase substantially (Volume II, p. 9). This trend is expected to continue based on both NIPC and IDES data. On the other hand, total County employment has increased more rapidly than originally anticipated in the 1991 Plan. Total employment is estimated by NIPC to increase annually at 1.928

percent, from 99,431 employees in 1990 to 145,678 employees in 2010. Note that this employment data applies to Will County only and not the extended Will County Service Area.

Waste Generation

The 1991 Plan estimated that 420,057 tons of solid waste were generated in Will County in 1990 (Volume II, p. 7). Annual waste generation in Will County was estimated to increase by 25 percent during the period 1990-2015, projecting 524,861 tons generated in 2015. Waste generation is revised from the 1991 Plan since the population base is expanded to the population of the Will County Service Area in this Plan Update. Generally, in forecasting future waste levels, the waste generation rates on both a per employee and per capita basis are utilized. However, since the employment data does not cover the entire service area and the commercial and industrial waste generation rates on a per capita basis do not vary significantly from the 1991 Plan, population and the per capita waste generation rates will be utilized in this Plan Update.

The Solid Waste Planning and Recycling Act requires that the amount of "municipal waste" generated by Will County be quantified. The Act defines municipal waste as any garbage, refuse, industrial lunchroom or office waste, and other material resulting from the operation of residential, commercial or institutional establishments and from community activities. Municipal waste does not include industrial process waste, manufacturing waste, special waste, agricultural waste, and other waste streams which are not similar in character to general household and commercial waste. Table 5 identifies municipal solid waste (MSW) and total waste estimated to be generated by the Will County Service Area through the planning period 1995-2020 at five year intervals, utilizing the most current population data available. The extended Will County Service Area is utilized to plan sufficient management and disposal of solid wastes. Annual waste generation is estimated to increase by 54 percent during the planning period.

Section IV - Current Hauling System

The system for collection and hauling of solid waste in Will County has not changed substantially since the 1991 Plan was adopted. Collection and hauling is performed by the private sector (except in Beecher, in which collection is performed by the Public Works Department). Most municipalities in the County have exclusive franchise agreements with haulers for collection from residential buildings with 4 or less units. Larger multi-family residential buildings, commercial, industrial, and institutional users typically contract individually for the collection of their waste. Haulers are licensed in a few of the municipalities. A few remaining municipalities who do not franchise hauling in their communities require the licensing of haulers and allow residents, commercial, industrial and institutional users to select their hauler from among licensed haulers in the municipality.

Table 5
Will County Waste Projections: 1990-2020

Year	Population ¹	Residential Waste ²	Commercial/Institutional Waste ³	Construction & Demolition ⁴	Municipal Solid Waste Subtotal ⁵		Industrial Waste ⁶	Total Waste ⁷	
					Tons	tpd		Tons	tpd
1990	654,904	334,656	143,424	86,054	564,134	1,546	131,472	695,606	1,906
1995	689,822	352,499	151,071	90,643	594,213	1,628	138,482	732,695	2,007
2000	726,602	371,294	159,126	95,476	625,895	1,715	145,865	771,761	2,114
2005	810,578	414,206	177,517	106,510	698,232	1,913	162,724	860,956	2,359
2010	904,260	462,077	198,033	118,820	778,929	2,134	181,530	960,460	2,631
2015	980,217	500,891	214,667	128,800	844,359	2,313	196,779	1,041,137	2,852
2020	1,062,554	542,965	232,699	139,620	915,284	2,508	213,308	1,128,592	3,092

Notes:

¹ Population from Table 4.

² Assumes 2.8 pcd for residential waste generation (see Table 1).

³ Assumes 1.2 pcd for commercial/institutional waste generation net of recycling.

⁴ Assumes 0.72 pcd for construction and demolition waste generation.

⁵ Municipal Solid Waste equals residential, commercial/institutional, and construction and demolition waste.

Annual tonnage is divided by 365 days/year to obtain tons per day (tpd).

⁶ Assumes 1.1 pcd for industrial waste generation net of recycling.

Industrial waste is waste from manufacturing, construction, and mining operations.

⁷ Total Waste equals Municipal Solid Waste plus industrial waste.

In the unincorporated areas of the County, residential, commercial, industrial, and institutional users contract individually with haulers for collection services. The County does not currently license or register hauling companies.

There are currently 20 private haulers known to be collecting municipal solid waste in Will County. They are:

A&J Disposal (NuWay Disposal, Tinley Disposal, Star Disposal, Homewood Disposal)
Banner Western Disposal Service
Berlinski Scrap Corporation
Browning-Ferris Industries (BFI)
C&A Disposal
Citiwaste, Inc.
Crown Disposal (Groot Recycling and Waste Services)
Frankfort Mokena Disposal
Illinois Disposal Corporation
Joliet Disposal Incorporated
Circle Lions Club
Resource Management
Skyline
South Holland
John Sexton Contractors
TCD Services
Trinity Services Incorporated
USA Waste Services
Workman's
Waste Management of South Suburbs

The firms listed vary in size and range of services offered.

Four permitted transfer stations are currently in the County. One facility (IEPA #1971100003), owned and operated by TCD Services, is located on Illinois route 53, south of Wilmington. Two other operating transfer stations are the Banner Western facility in Rockdale (IEPA #1970850012) and the Citiwaste facility in Joliet (IEPA #1978093002). Another transfer station with material recycling is under construction near Joliet by CDT Services (IEPA #1970450096).

Curbside recycling services have significantly expanded since 1991 from only eight communities to 23 communities in 1995. Curbside recycling collection is offered on a weekly basis in the following locations in the Will County Service Area by the listed haulers:

<u>Municipality</u>	<u>Hauler (Curbside Recycling Collection)</u>
Beecher	City of Beecher
Braidwood	TCD Services
Bolingbrook	Crown Disposal
Channahon	Banner Western
Diamond	C&A Disposal
Elwood	C&A Disposal
Frankfort	NuWay
Joliet	Browning-Ferris Industries
Lemont	Banner Western
Lockport	Crown Disposal
Manhattan	C&A Disposal
Minooka	TCD Services
Mokena	NuWay
Naperville	Waste Management
New Lenox	NuWay
Park Forest	Star Disposal
Plainfield	Browning-Ferris Industries
Romeoville	Banner Western
Sauk Village	Skyline
Shorewood	C&A Disposal
Tinley Park	Tinley Disposal
Wilmington	TCD Services
Woodridge	Waste Management

Recycling drop off centers utilized by Will County residents are operating in: Beecher, Bolingbrook, Chicago Heights, Crest Hill, Crete, Homer, Joliet, Minooka, Monee, New Lenox, Peotone, Plainfield, Rockdale and Wilmington.

Residential collection in all areas of the County is based on a flat rate pay system. Residential (over four units), commercial, industrial, and institutional collection is, for the most part, offered on a volume based pay system.

Section V - Current Disposal Capacity

Existing facilities located in Will County include transfer stations, recycling processing and composting facilities, small on-site incinerators and landfills. Figure 2 shows the general location of the transfer station, material recycling facility and landfills. Transfer stations, recycling processing facilities and composting facilities are intermediate disposal facilities while landfills are considered final disposal. Transfer stations were discussed in the previous section. Recycling processing and composting facilities, small on-site incinerators and landfills are discussed below.

Recycling Processing and Composting Facilities

The 1991 Plan indicated that four recycling processing facilities serve the County. They were in unincorporated Crete, Joliet, and Wilmington Townships and the City of Joliet. Currently, one material recycling facility (MRF) in Plainfield operated by Resource Management serves Will County and portions of DuPage County. This MRF began operations after the 1991 Plan was adopted. Recycling also occurs at the three operating transfer stations located near or in the cities of Wilmington, Rockdale and Joliet. The new CDT transfer station will also conduct recycling activities.

Yard waste composting is currently occurring at four permitted facilities. Two composting facilities are operated by Land & Lakes/Willow Ranch (IEPA #1978030003 and #1970100001) and the other two are operated by CDT (IEPA #1978170005 and #1978170006) at their landfill sites. In addition, three on-farm land application operations are permitted near Peotone (IEPA #1970000000), Manhattan (IEPA #1978080001) and Crete (IEPA #1978010004). This information represents an update of the information contained in Table 2.4 of Volume IV of the 1991 Plan.

Will County's rate of recycling in 1990 was 7.5 percent as estimated by Becker Associates for the 1991 Plan. In 1994, approximately 116,600 tons of material was recycled and 53,500 tons composted from Will County as reported in IEPA's Eighth *Annual Available Disposal Capacity for Solid Waste in Illinois*. County recycling rates in 1993 and 1994 were approximately 30 percent which exceeded the recycling goals in the 1991 Plan.

Incinerators

Small amounts of hospital, commercial and industrial waste is incinerated at on-site locations within the County. An addendum to the County's Interim Solid Waste Management Plan estimated that in 1987, 14,997 tons (49,490 cubic gateyards) of waste was incinerated annually in the County. No new incineration permits have been issued in

the County and no significant changes have occurred since the 1991 Plan. The estimated rate of 14,997 tons of such waste incinerated annually will continue to be used. This incinerated waste was not included in the generation rates because it never enters the wastestream.

Landfills

Since the 1991 Plan, five landfills located in Will County have permanently closed. Currently, four sanitary landfills are permitted in the County to accept MSW. However, only two of these four facilities are actually accepting MSW. Out of the other two landfills, one (Laraway ESL) accepts municipal ash and special waste and the other (Wheatland Prairie) is temporarily closed. One additional facility (American Fly Ash) is permitted to accept only fly ash and other coal combustion by-products. All of the disposal facilities in Will County are privately owned and operated. The landfills and their operational and permit status are as follows:

- Beecher Development Unit III (IEPA #1978010001) - This facility is permitted for, and accepting municipal and special waste.
- Beecher Development Units I & II (IEPA #197801001) - This facility has closed since the 1991 Plan.
- CDT Landfill, New (IEPA #1978170006) - This facility is permitted for, and accepting, municipal, special and demolition waste. In January 1990 a development permit application for this expansion was submitted to the IEPA (Permit Log No. 1990-030). The IEPA denied the permit request on July 13, 1990 for 12 stated deficiencies in the application. The deficiencies were resolved and the permit application was resubmitted to the IEPA for subsequent approval.
- CDT Landfill, Old (IEPA #1978170005) - This facility has been closed since the 1991 Plan.
- Land and Lakes/Willow Ranch (IEPA #1978030003) - This facility has been closed since September 1992. The operator applied to the Village of Romeoville for local siting approval in 1990 for a 98 acre expansion to accept MSW and special waste. A local siting hearing was held. The expansion request was denied. The operator continues to seek siting on appeal.
- Laraway (ESL) Landfill (IEPA #1970450002) - This facility is permitted for municipal and special waste. The facility is currently accepting municipal incinerator ash and special waste.

- Wheatland Prairie (IEPA #1978200004) - This facility was permitted in 1981. Until February 1990, the facility was accepting municipal solid waste. The facility was issued a supplemental permit by the IEPA, on April 3, 1990, to temporarily suspend landfill operations at the site (Supplemental Permit No. 1990-067-SP). At the time of this Plan Update, the facility remains temporarily closed for business reasons. The operator will reportedly reopen this facility as market conditions change.
- Wilmington Municipal (IEPA #1971100001) - This facility has been closed since September 1992.
- American Fly Ash (IEPA #1970500011) - This facility is permitted for, and accepting, fly ash and other coal combustion by-products.
- Joliet Army Ammunition Plant (IEPA #1970450027) - This on-site facility has been closed since September 1992.

The County currently collects groundwater samples at eight of these landfill sites (excludes Wilmington Municipal and Joliet Army Ammunition Plant). Three wells at each site (one upgradient and two downgradient) and two underdrain effluent locations at one site are sampled. At each well location, approximately 10 samples are collected for testing. Samples are collected by representatives of the Waste Services Division, Will County Land Use Department, in accordance with IEPA Sampling Protocol. The samples are then analyzed by a contracted IEPA Certified Laboratory for Priority Pollutants consisting of 127 organic and inorganic compounds. Results are reviewed to determine compliance with groundwater quality standards and site specific groundwater permit conditions. Samples are taken twice a year at each site, totaling (52 wells) 520 samples analyzed each year.

The Eighth Annual IEPA report, *Available Disposal Capacity for Solid Waste in Illinois*, September 1995, reports the following remaining capacities for sanitary landfills in Will County. The capacities in Table 6 are presented in cubic yards as of the end of 1994. Remaining capacity data for 1995 will be available when IEPA issues the Ninth Annual Report next year. The 1991 Plan had estimated 17.4 million cubic gateyards remaining in 1990.

Table 6
Remaining Capacity In Will County

Facility	Remaining Capacity ¹
Beecher Development	2,838,443 cubic yards
CDT Landfill	2,592,000
Laraway (ESL) Landfill	1,178,425
Wheatland Prairie ²	4,611,173
Total	11,220,041 cubic yards

Notes:

¹ December 31, 1994 remaining capacity as reported by IEPA.

² Wheatland Prairie remains temporarily closed.

The IEPA report indicated that in 1994, 2,790,954 cubic gateyards of waste was disposed in Will County. Of that amount, 140,153 cubic gateyards was out-of-State waste. Other out-of-county waste was not identified. Based on waste generation and recycling estimates for the Will County Service Area, and using a conversion factor of 600 lbs per cubic yard, approximately 1,676,966 cubic gateyards was generated for disposal within the Will County Service Area in 1994. This indicates that approximately 1,113,988 cubic gateyards or 40 percent of the waste disposed in the County was imported from areas outside the Will County Service Area.

The overall waste disposed in the County has decreased from about 3.1 million cubic yards in 1990 to about 2.8 million cubic yards in 1994. With the closing of landfills due to Subtitle D regulations and the temporary closing of Wheatland Prairie Landfill, available disposal capacity within Will County has been reduced. Some out-of-county waste most likely obtained disposal capacity elsewhere in the Chicago metropolitan area.

On the other hand, some of the waste generated in Will County is exported for disposal. The 1991 Plan indicated that approximately 10 percent of the waste generated for disposal in Will County was exported primarily to Green Valley Landfill in DuPage County, Morris Landfill in Grundy County, and various other disposal areas. For this Plan Update, the exportation of waste is assumed to continue at this rate.

Section VI - Need

The 1991 Plan projected that existing disposal capacity in Will County would be filled by 1998. The following is an update of these projections.

The need for additional waste disposal facilities and capacity in the County is determined by comparing the expected waste generation to the remaining capacity reported by the IEPA. The imported waste amounts are assumed to continue at a constant level to the existing privately owned and operated facilities. Imported waste amounts have been revised from approximately 1.8 million cubic gateyards annually as stated in the 1991 Plan to approximately 1.1 million cubic gateyards per year estimated in the previous section. This imported volume is used in the updated projections until the existing facilities reach capacity.

Once the County's landfill is operational, the County anticipates that all waste primarily disposed of in the County's proposed landfill will be equal to the amount generated within the Will County Service Area. However, nothing shall prevent the siting of an expansion of an existing facility or a new facility in Will County if it can be demonstrated that the nine criteria defined under Illinois Environmental Protection Act, 415 ILCS 5/39.2 have been met. In its Interim Solid Waste Management Plan, the County established a policy that any expansion of a facility must be intended for a service area defined as Will County. In this Plan Update, that policy has been slightly altered to reflect the current solid waste market and the legal and political changes which have occurred since the adoption of the Interim Plan. When the Solid Waste Management Plan Landfill component is implemented, the County, by siting, permitting and operating its own landfill, intends to provide for a minimum 20 year capacity for the Will County Service

Service Area. The County's planning objective is to limit the total amount disposed in the proposed County Landfill, and to offer capacity first to the Will County Service Area.

The waste generation in Table 7 reflects the updated population projections. Total waste generated in tons is multiplied by 3.3 to convert to cubic gateyards (600 lbs/cy is a generally accepted average waste density). It is assumed all waste generated in the Will County Service Area is disposed of within the County. The remaining capacity reported by IEPA at the end of 1994 is adjusted to 1995 based on estimated waste generation and recycling rates. Table 7 shows the worst case scenario with no recycling occurring during the planning period 1996-2020.

Table 8 shows remaining capacity projections for high, medium and low recycling rates during the planning period 1996-2020. The high recycling rate corresponds to the recycling goals presented in the 1991 Plan. The County has been recycling approximately 30 percent which matches the Plan goal for the year 1995. The medium recycling rate assumes that the County maintains the 30 percent recycling rate throughout the planning period. The low recycling rate assumes that the County will at least obtain the average recycling rate for the State of Illinois which is about 19 percent, as reported in the Eighth Annual IEPA report, *Available Disposal Capacity for Solid Waste in Illinois*.

According to Table 7, the existing disposal facilities could reach capacity by as early as mid-1998. This assumes Wheatland Prairie is reopened with a permitted capacity of 4,611,173 cubic yards. If the recycling goals are met, the existing facilities may be able to accept waste until early 1999. If, however, the Wheatland Prairie facility does not reopen, remaining capacity in other Will County disposal facilities will be filled in 1997, even with the highest recycling rate assumption.

To meet the projected disposal capacity need, the County has selected a 455-acre site on a portion of the Joliet Arsenal for the proposed County Landfill. The proposed landfill is anticipated to be operational in 1999. During the period of time prior to the opening of the County's Landfill, interim disposal capacity will be needed, and may be provided by either the selected private contractor and/or other solid waste disposal facilities already located within Will County. Section IX describes the proposed landfill in greater detail. Interim and final facilities should be economically beneficial (i.e., the implementation of an appropriate host benefit fee) and environmentally sound for the County.

Table 7
Capacity Projections - Worst Case, No Recycling

Year	Population ²	Total Waste Generated (tons) ³	Recycling Rate ⁴	Will Co. Waste Generated For Disposal (cu.yd.) ⁵	Waste Imported For Disposal (cu.yd.) ⁶	Total Waste Disposed ⁷	Remaining Capacity ⁸
1990 ¹	654,904		7.5%				
1994	682,693	725,122	30.6%	1,676,966	1,113,988	2,790,954	11,220,041
1995	689,822	732,695	30.6%	1,694,479	1,113,988	2,808,467	8,411,574
1996	697,026	740,346	0.0%	2,467,821	1,113,988	3,581,809	4,829,765
1997	704,305	748,078	0.0%	2,493,593	1,113,988	3,607,581	1,222,184
1998	711,661	755,890	0.0%	2,519,635	-	2,519,635	(1,297,451)
1999	719,093	763,784	0.0%	2,545,948	-	2,545,948	(3,843,399)
2000	726,602	771,761	0.0%	2,572,535	-	2,572,535	(6,415,934)
2001	742,671	788,828	0.0%	2,629,426	-	2,629,426	(9,045,360)
2002	759,095	806,273	0.0%	2,687,575	-	2,687,575	(11,732,936)
2003	775,882	824,103	0.0%	2,747,011	-	2,747,011	(14,479,946)
2004	793,041	842,328	0.0%	2,807,760	-	2,807,760	(17,287,706)
2005	810,578	860,956	0.0%	2,869,853	-	2,869,853	(20,157,559)
2006	828,504	879,996	0.0%	2,933,319	-	2,933,319	(23,090,878)
2007	846,826	899,457	0.0%	2,998,188	-	2,998,188	(26,089,066)
2008	865,554	919,348	0.0%	3,064,493	-	3,064,493	(29,153,559)
2009	884,695	939,679	0.0%	3,132,263	-	3,132,263	(32,285,822)
2010	904,260	960,460	0.0%	3,201,532	-	3,201,532	(35,487,354)
2011	918,965	976,079	0.0%	3,253,596	-	3,253,596	(38,740,950)
2012	933,910	991,952	0.0%	3,306,507	-	3,306,507	(42,047,457)
2013	949,097	1,008,083	0.0%	3,360,278	-	3,360,278	(45,407,735)
2014	964,531	1,024,477	0.0%	3,414,924	-	3,414,924	(48,822,658)
2015	980,217	1,041,137	0.0%	3,470,458	-	3,470,458	(52,293,116)
2016	996,157	1,058,069	0.0%	3,526,895	-	3,526,895	(55,820,011)
2017	1,012,357	1,075,275	0.0%	3,584,250	-	3,584,250	(59,404,262)
2018	1,028,820	1,092,761	0.0%	3,642,538	-	3,642,538	(63,046,800)
2019	1,045,551	1,110,532	0.0%	3,701,774	-	3,701,774	(66,748,574)
2020	1,062,554	1,128,592	0.0%	3,761,973	-	3,761,973	(70,510,547)

Notes:

- ¹ 1990 Census Population from Table 2.
- ² Annual increases based on population projections by township from NIPC data, October 1994 (see Table 3).
- ³ Assumes 5.82 pcd for residential, commercial, industrial, and construction/demolition waste.
- ⁴ Actual recycling used through 1995. Assumes no recycling thereafter.
- ⁵ Equals total waste generated minus recycling, converted to cubic yards by multiple of 3.3.
- ⁶ Waste importation calculated from IEPA reported waste disposed in 1994 minus estimated waste generation for Will County planning area. Assumes importation remains constant.
- ⁷ Will County waste plus imported waste. Waste disposed in 1994 as reported by IEPA.
- ⁸ Remaining Capacity in cubic yards at the end of the year. 1994 capacity as reported by IEPA.
- ⁹ The twenty-year (1999-2018) average annual waste to be disposed is approximately 3.1 million cubic yards (926,000 tons), with no recycling.

Table 8
Will County Capacity Projection Net of Recycling

Year	Waste Imported (cu.yd.) ¹	Will County Waste Generated (cu.yd.) ²	High ³			Medium ⁴			Low ⁵		
			Recycling Rate	Total Waste Disposed	Remaining Capacity	Recycling Rate	Total Waste Disposed	Remaining Capacity	Recycling Rate	Total Waste Disposed	Remaining Capacity
1990			7.5%			7.5%			7.5%		
1994	1,113,988	2,417,074	30.6%	2,790,954	11,220,041	30.6%	2,790,954	11,220,041	30.6%	2,790,954	11,220,041
1995	1,113,988	2,442,316	30.6%	2,808,467	8,411,574	30.6%	2,808,467	8,411,574	30.6%	2,808,467	8,411,574
1996	1,113,988	2,467,821	32.0%	2,792,107	5,619,468	30.0%	2,841,463	5,570,111	19.0%	3,112,923	5,298,651
1997	1,113,988	2,493,593	34.0%	2,759,760	2,859,708	30.0%	2,859,503	2,710,608	19.0%	3,133,799	2,164,852
1998	1,113,988	2,519,635	36.0%	2,726,554	133,154	30.0%	2,877,732	(167,124)	19.0%	3,154,892	(990,040)
1999	-	2,545,948	38.0%	1,578,488	(1,445,333)	30.0%	1,782,163	(1,949,287)	19.0%	2,062,218	(3,052,257)
2000	-	2,572,535	40.0%	1,543,521	(2,988,855)	30.0%	1,800,775	(3,750,062)	19.0%	2,083,754	(5,136,011)
2001	-	2,629,426	42.0%	1,525,067	(4,513,922)	30.0%	1,840,599	(5,590,661)	19.0%	2,129,835	(7,265,846)
2002	-	2,687,575	44.0%	1,505,042	(6,018,964)	30.0%	1,881,303	(7,471,964)	19.0%	2,176,936	(9,442,782)
2003	-	2,747,011	46.0%	1,483,386	(7,502,350)	30.0%	1,922,907	(9,394,871)	19.0%	2,225,079	(11,667,861)
2004	-	2,807,760	48.0%	1,460,035	(8,962,385)	30.0%	1,965,432	(11,360,303)	19.0%	2,274,286	(13,942,147)
2005	-	2,869,853	50.0%	1,434,926	(10,397,312)	30.0%	2,008,897	(13,369,200)	19.0%	2,324,581	(16,266,727)
2006	-	2,933,319	50.0%	1,466,659	(11,863,971)	30.0%	2,053,323	(15,422,523)	19.0%	2,375,988	(18,642,715)
2007	-	2,998,188	50.0%	1,499,094	(13,363,065)	30.0%	2,098,732	(17,521,255)	19.0%	2,428,533	(21,071,248)
2008	-	3,064,493	50.0%	1,532,246	(14,895,311)	30.0%	2,145,145	(19,666,400)	19.0%	2,482,239	(23,553,487)
2009	-	3,132,263	50.0%	1,566,131	(16,461,443)	30.0%	2,192,584	(21,858,984)	19.0%	2,537,133	(26,090,620)
2010	-	3,201,532	50.0%	1,600,766	(18,062,209)	30.0%	2,241,072	(24,100,056)	19.0%	2,593,241	(28,683,861)
2011	-	3,253,596	50.0%	1,626,798	(19,689,007)	30.0%	2,277,517	(26,377,574)	19.0%	2,635,413	(31,319,274)
2012	-	3,306,507	50.0%	1,653,253	(21,342,260)	30.0%	2,314,555	(28,692,128)	19.0%	2,678,271	(33,997,544)
2013	-	3,360,278	50.0%	1,680,139	(23,022,399)	30.0%	2,352,195	(31,044,323)	19.0%	2,721,825	(36,719,370)
2014	-	3,414,924	50.0%	1,707,462	(24,729,861)	30.0%	2,390,446	(33,434,769)	19.0%	2,766,088	(39,485,458)
2015	-	3,470,458	50.0%	1,735,229	(26,465,090)	30.0%	2,429,320	(35,864,090)	19.0%	2,811,071	(42,296,528)
2016	-	3,526,895	50.0%	1,763,448	(28,228,538)	30.0%	2,468,827	(38,332,916)	19.0%	2,856,785	(45,153,313)
2017	-	3,584,250	50.0%	1,792,125	(30,020,663)	30.0%	2,508,975	(40,841,892)	19.0%	2,903,243	(48,056,556)
2018	-	3,642,538	50.0%	1,821,269	(31,841,932)	30.0%	2,549,777	(43,391,668)	19.0%	2,950,456	(51,007,012)
2019	-	3,701,774	50.0%	1,850,887	(33,692,819)	30.0%	2,591,242	(45,982,910)	19.0%	2,998,437	(54,005,449)
2020	-	3,761,973	50.0%	1,880,986	(35,573,805)	30.0%	2,633,381	(48,616,291)	19.0%	3,047,198	(57,052,647)

Notes 1 Waste importation calculated from IIRPA reported waste disposed in 1993 minus estimated waste generated for Will County planning area. Assumes importation remains constant.

2 Total Waste Generated in tons from Table 7 multiplied by 3.3 to convert to cubic yards.

3 High recycling rate assumes 50% recycling goal in 1991 Plan is met.

4 Medium recycling rate assumes existing recycling of 30% continues.

5 Low recycling rate assumes the average recycling for the State of Illinois is obtained.

6 The annual waste disposed will vary from year to year depending upon population growth and the recycling rate actually achieved. For planning purposes, an average annual disposal requirement of 700,000 tons is realistic.¹⁶

Section VII - Institutional Structure

Background

In 1991, all solid waste disposal facilities in the County were privately owned and operated. The private sector facilities did not operate under one coordinating plan. Until the County began planning activities in the solid waste area, there had been no one lead planning agency in the area.

As the County's involvement increased in the solid waste planning arena, other entities were considered as possible lead agencies for solid waste planning in the County. Unfortunately, no one organization, (except The County of Will), seems to represent all of Will County. For example, the Council of Mayors are active only in the urban areas of the County; the Municipal League acts on behalf of the municipalities on legislative affairs in Springfield and acts as a forum locally, but is not a direct provider of local services; the Joliet/Will County Center for Economic Development is not consistently active throughout Will County; no formal, incorporated countywide association of Mayors and Managers exist; and finally, no current intergovernmental agencies serve all of Will County (the 911 committee may be an exception to this). In short, the County did not see an already existing entity capable of preparing a County wide solid waste management plan.

A similar discussion of appropriate agencies was applied to the implementation of the recommendations of a countywide plan. Municipalities and others will be responsible for specific parts of the implementation of the plan, but the County is the only existing entity capable of countywide implementation. Discussion was held at the County's Municipal Solid Waste Advisory Committee about the creation of a separate intergovernmental agency to lead the implementation of the solid waste disposal system advised by this plan. Unfortunately, again, previous experiences highlight the difficulty of intergovernmental agencies in Will County. The primary point of contention in creating an intergovernmental agency in Will County is representation for municipalities. This issue was seen as a primary obstacle in the creation of an intergovernmental agency. Also, given the relative urgency of the need for a countywide system, and the time necessary to establish an intergovernmental agency, it was determined that time would be best spent in moving towards implementation of a solid waste disposal system with the County in the lead rather than the development of a new intergovernmental agency.

At that point, consensus was reached by the Municipal Advisory Committee that the County should assume the lead role in the implementation of a solid waste disposal plan. Negotiation began on a solid waste agreement for use between the municipalities and the County. The document was intended from the start to be the subject of extended negotiation. The 1991 Plan called for the County to develop a new landfill for the use of municipalities who enter into the solid waste agreement. The 1991 Plan provided that the County would acquire a site; prepare permit applications and acquire a development permit; finance the site development and construction; and contract with a private operator.

Updated Institutional Structure

In the updated institutional structure for the solid waste agreement, the participating municipalities and townships, at their option, may commit their wastestreams in need of disposal, excluding unacceptable special waste, hazardous wastes and nuclear wastes, to a County sponsored disposal facility. The County agrees to provide at least 20 years of disposal capacity to the participating municipalities and townships for the wastestream in need of disposal via the privatized development of a new landfill. This solid waste management system is to be environmentally sound and economically beneficial for the County of Will. The County sponsored facility is discussed at length in Section IX of this Plan Update. The County will negotiate with a private vendor to site, design, develop, permit, finance, construct and operate this facility. The solid waste agreement does not commit the flow of recyclables to a specified processing facility. Rather, it requires that specific volume reduction and recycling goals be met. How the municipalities meet the goals is left to their discretion.

The County's agreement with participating municipalities and townships has not yet been finalized. It will be finalized after signing the contract with the private contractor for the County's landfill. Generally, the agreement is anticipated to have the following advantages for the participating municipalities and townships:

- five percent lower tipping fee than the average tipping fee at 10 area landfills or a stated unit price (whichever is less);
- option to join or not to join or to discontinue participation with one-year written notice, without penalty;
- no put-or-pay requirement;
- indemnification from future environmental liabilities, to the extent legally possible, through an insurance coverage by the County's landfill contractor; and
- guaranteed disposal capacity for a minimum of 20 years.

In conclusion, the County of Will is designated by this Plan Update as the governmental entity which will continue to be responsible for the implementation of this plan. The principle change from the 1991 Plan is the privatized approach to designing, siting, permitting, financing, developing, and operating the landfill. Also, the functions of the Policy Board, mentioned in the 1991 Plan, will be performed by the Will County Board.

Section VIII - Method/Technology Options Considered

The technologies and methods of solid waste management considered as a part of this planning process include: volume reduction, recycling and landscape waste composting, incineration with energy recovery and landfilling. Each of these alternatives is discussed in detail in the technical reports included with the 1991 Plan, Volumes III, IV, V, and VI.

The Illinois Solid Waste Management Act (415 ILCS 20/2) established a hierarchy of solid waste management alternatives, with the most preferable method of solid waste management at the top of the hierarchy. The hierarchy of solid waste management alternatives is:

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

The technical reports of the Plan correspond to this hierarchy. The one method included in the hierarchy but not dealt within a technical report is combustion for volume reduction. The County found in its Interim Solid Waste Management Plan that combustion for volume reduction was prohibitively expensive, and thus would not be considered further. In addition, unproven technologies will not be considered for the recommended Solid Waste Management System. The analysis and conclusions reached in these technical reports remain unchanged in this Plan Update.

Section IX - Recommended Solid Waste Management System

As previously stated, the solid waste management system recommended for the county was derived using the established hierarchy. The County began at the top of the hierarchy and working with each solid waste management alternative, determined what percent of the wastestream could reasonably be managed at each level of the hierarchy. Again, the exception to this is that the County will not consider combustion for volume reduction after finding it cost prohibitive in the Interim Plan.

Volume Reduction

Beginning with volume reduction at the source, the County expects a five percent reduction in the volume of solid waste generated for disposal. The updated programs necessary to meet this goal are as follows:

1. The Plan required building waste disposal cost into bid considerations. However, bidders are reluctant to support such requirements and, therefore, this program will be discontinued.

2. The Plan required bid preference for items produced with recycled feedstock and the consideration of disposal costs in awarding bids. However, bidders are reluctant to support such requirements and, therefore, this program will be discontinued. On the other hand, the County will promote (through the educational program below) the use of products containing recycled materials.
3. Promotional campaigns in grade schools to increase awareness that products containing excessive packaging would result in the necessity to dispose of more material. This program has been working and will be continued.
4. An educational campaign through grade schools has been encouraging students to consider the following questions at the time of a purchase decision:

Is this a necessary purchase?

Is there a used alternative for this purchase?

If this is a one-time need is there a rental alternative?

Is there a product of lesser size or mass that will satisfy the need?

May this product be reused?

Does this product contain recycled material?

What are the disposal ramifications and costs of this purchase?

This educational program has been working and will be continued.

Educational campaigns for businesses and institutions have not produced expected results and, therefore, will be discontinued.

5. The Plan required the County to establish a policy applicable to all county copying facilities requiring that all copying be two-sided. All county offices now have two-sided copy machines. This program has been working and will be continued.
6. The Plan called for the creation and staffing of an information source for County residents, businesses and institutions, devoted to providing information on practices to reduce solid waste generation and to fulfill an advocacy role in the community for solid waste volume reduction. Staffing was not created and is not likely to be created. Therefore, this program will be discontinued.
7. The Plan required the County to work with the Three Rivers Manufacturers Association to provide waste stream audits. This has not been accomplished due to low staffing levels. The staffing level is not likely to increase. This program will be discontinued.
8. The Plan required the County to work with municipalities to implement a volume or weight based solid waste collection system in conjunction with recycling programs. To date, volume and weight based collections have not been implemented by the municipalities. This program will be left voluntary

for the municipalities to implement. Weight based recycling is done and will be continued. Haulers keep records of the weight of recyclables.

9. Volume Reduction/Recycling Grant Programs, Wilmington Model Community, and Information Clearinghouse programs have been implemented and will be continued. The financing of these programs came from the County's surcharge on solid waste tipping fees and will be continued as such. A separate fund was proposed to be established through the solid waste agreements between municipalities, townships and the County. However, the County plans to privatize the waste disposal in order to avoid "flow control" problems and as such the separate volume reduction/recycling fund would not be established. Instead, the County would fund these programs through the County's surcharge on solid waste tipping fees.

Recycling and Landscape Waste Composting

The Recycling and Landscape Waste Management technical report of the Plan (Volume IV) sets out an implementation schedule in Section 9.2. With the adoption of this first five-year update of the original Solid Waste Management Plan, the County establishes for itself the same recycling target of 30 percent of the municipal waste stream within five years of the adoption of the 1991 Plan and 40 percent of the municipal waste stream as discussed in Volume IV, within a ten year period. The County further commits itself to a recycling goal of 50 percent of the waste stream within 15 years of the adoption of the 1991 Plan. The means to reach this 50 percent goal are not set out in this Plan Update but will be addressed at the next five-year update. To coordinate efforts, the County's Solid Waste Director or his/her designee is hereby designated as the County's Recycling Coordinator.

Will County has an aggressive waste reduction and recycling program. During the last five years of the Plan the County has distributed over a half-million dollars of grants to promote recycling and volume reduction. In addition, the County conducted annual educational programs, participated in recycling expos and earth days, and accepted speaking engagements, whenever requested by grade schools and others. As a result, the County is currently ahead of its recycling goals and has curbside recycling in most of its cities and villages and drop-off centers for most of its unincorporated areas (See Section IV). Furthermore, the County has actively supported commercial recycling, yard waste composting, and land application of yard waste and, as a result, commercial recycling is occurring at three transfer stations, yard waste composting at four permitted facilities and yard waste land-application at three farms (See Section V). The County does not anticipate development of additional recycling processing facilities unless adequate markets for products are available or can be created consistent with facility development in a timely manner. Also, for recycling of construction/demolition waste in road and highway reconstruction projects, the County supports the use of recycling of asphalt and concrete in the bidding process of all Illinois Department of Transportation related projects located in Will County. These recycling and waste reduction methods will continue.

The following table shows a comparison of accomplishments in recycling versus annual Plan goals:

Table 9
Recycling Accomplishments During Last Five Years

Year	1991 Plan Goal	Planning and Recycling Act Goal	Actual Recycling Rate	Remarks
1991	10%	5%	7%*	* Commercial & construction demolition waste recycling not included.
1992	15%	10%	27.83%	
1993	20%	15%	30.02%	
1994	25%	20%	30.62%	
1995	30%	25%	NA	Will be available in March 1996

Also, in June of 1993, environmental and agricultural organizations held a tire collection event in Will County. The Will County Farm Bureau, Will-DuPage Farm Service Company, Illinois Environmental Protection Agency, University of Illinois Cooperative Extension Service, and Lookin' Good Commission (the Will County chapter of the environmental group Keep America Beautiful) each co-sponsored the event. Over 18,000 tires were collected and transported to a minimum-security prison in Lincoln. The tires were to be burned as fuel for heat and electricity. According to the Illinois Environmental Protection Agency, tires used as a fuel source cannot be computed into recycling rates; therefore, this event did not contribute towards Will County's recycling goal. However, the event was a success as a total of 566.4 tons of tires were collected and diverted from area landfills. About one percent of municipal solid waste by weight in Will County is estimated to be tires.

Volume VII of the 1991 Plan, page 8, mentions a public comment regarding large-scale in-vessel composting if private compost facilities did not develop. Since adequate private compost facilities have already developed in Will County, there is no need for large-scale in-vessel composting.

For recycling and landscape waste composting the County will observe the following programs:

1. Recycling Education - The Plan required development of a public education program for the residents, business owners, office managers, plant managers, presidents of institutions, and all people who live and/or work in Will County. The County has implemented this program and will continue the program.

Will County has assigned and will continue to assign recycling education responsibilities to one or more trained staff people. Staff will be responsible

for implementing or working with others to implement the suggested educational activities listed in Section 9.3 of Volume IV of the 1991 Plan. Education in the non-residential sector may be more effective if the education efforts are conducted by business leaders rather than County staff.

2. Technical Assistance - The Plan required development of a technical assistance program. The County has such a program and will continue this program. County staff assigned to such a program will assist municipal officials in the development and expansion of residential recycling programs. They will also assist business owners and managers in the development and expansion of non-residential waste recycling programs. Lack of information is a frequently stated reason for non-involvement in recycling programs. Such technical assistance programs currently provide and will continue to provide available information and assistance at no charge.

The types of activities included in a technical assistance program are discussed in Section 9.1.1 of Volume IV of the 1991 Plan.

3. Grants and Loans - The Plan required continuation of the County's Volume Reduction/Recycling grant program. The County has such a program and will continue to have this program. The County will continue to require grant recipients to implement recycled material procurement programs, or, alternatively, the County would require grant recipients to implement a public education program associated with the grant funded activity.

Grant recipients would also be required to maintain records of the volume of material recycled. The Solid Waste Planning and Recycling Act requires commercial and institutional establishments that implement their own recycling programs to annually provide written documentation to the County of the total number of tons of material recycled. Most haulers, transfer stations, and compost facilities have been providing the county with total tons recycled during a calendar year, but are reluctant to give material-by-material breakdowns.

The Plan required three groups of individuals to be involved in recordkeeping: municipal officials, firms responsible for the collection of recyclables, and operators of processing and waste sorting facilities. There is a reluctance on the part of these three groups to keep detailed records, and without legislative authority, it is difficult for the County to enforce this recordkeeping requirement. Therefore, the recordkeeping requirement will not be enforced.

4. The Plan required elected officials to support recycling programs. This is being done upon requests of the public and would be continued on the same basis.

5. The Plan required a government implementation program. Will County has implemented an office paper collection program. The County has expanded it to beverage containers from lunchroom areas and to construction and demolition materials recycling through highway reconstruction programs. These programs are very effective and will be continued.
6. The Plan required economic incentives and disincentives through “pay by the bag” approach to residential waste collection, to encourage residents to mulch their grass clippings and to practice backyard composting, and through buy-back programs for tires, household batteries, used oil, and other difficult to handle materials. These incentives were not implemented by municipalities for a variety of reasons and the buy-back program was not implemented because the private industry is currently keeping these items out of landfills.
7. The Plan required demonstration programs. Wilmington has implemented a model program in Will County. This serves as a model for other municipalities. The County is considering expanding this approach in order to increase corrugated recycling, beverage container recycling, and office paper recycling within the County. Demonstration programs will also be continued for the highway reconstruction and recycling of construction and demolition debris.
8. The Plan required preparation of general-use materials. There is the potential for duplicative effort on the part of individual municipalities, businesses, and not-for-profit corporations, as they develop and implement their own recycling and landscape waste programs. Will County will develop general-use materials that can be individually adapted to local conditions. In order to develop general-use materials, the County will either develop original general-use materials or collect samples from other communities and businesses.

The following general-use materials will be created by the County:

- “Generic” pamphlets and brochures concerning recycling and landscape waste management for use and adaptation by municipal groups. The County has already developed recycling brochures for use by municipalities, township and individuals, and will continue to do so;
- Procurement ordinances for use by municipalities and private organizations. The model will establish guidelines on how to determine recycled content and how to set reasonable targets for recycled content;
- A “buy recycled” resolution or policy for use by the public and private sector;

- Waste audit forms for use by commercial and institutional establishments;
 - Hauling contracts that provide for franchising, collection of recyclables, and collection of landscape waste materials.
9. The Plan required site approval support. Facilities are needed to process the materials collected by recycling and landscape waste management programs. New processing and composting facilities require the selection and approval of sites. Will County has already developed a siting process for unincorporated areas and will assist municipalities in developing similar processes.
 10. The Plan required market development. Market development is critical to the long term success of recycling in the County. The issue of markets is described in detail in Chapter 7.0 of Volume IV. It is reiterated here because of its importance. Table 9.1 of the same document, however, indicates that market development is not as important to landscape waste programs as it is to material recycling because, if no markets are available, compost may be used as final cover at landfills. Experience shows that if the material is properly prepared and available at no charge, markets for finished compost is not a problem. Volume VII, page 12, mentioned revisitation of market development if there is no private sector recycling. Since ample private sector recycling exist in the County, there is no need for market development. However, the County will continue providing technical assistance in market development.

The financing of these programs has been through the County's surcharge on solid waste tipping fees. The same funds will continue to be used in the future to finance these programs.

Incineration with Energy Recovery

The 1991 Plan and its public comments required that the issue of incineration with energy recovery be revisited during the first five-year update of the plan. The Waste to Energy Feasibility Study (Volume V of the 1991 Plan) estimates that the per ton disposal cost, excluding hauling, for an incinerator would likely be in the range of \$57.50 to \$79.13 per ton in 1995. The high end of the range was derived using a fairly conservative fiscal approach. Different financing methods expose the County to varying levels of financial liability. The costing method used to derive the \$79.13 per ton figure would not expose the County to significant financial liabilities to the Illinois Department of Revenue (IDOR) during the course of operation of the facility. The cost of less liability is paid by higher fees to use the system. The low end of the range assumes exposure to repayment of liabilities to IDOR in the event of an early termination of the facility operations due to a change in law or force majeure event. These costs assume private ownership of the facility. Though the estimated cost of incineration with energy recovery is less than or comparable (when transportation costs are added) to that of volume reduction or recycling it is not as desirable, for environmental reasons, as these other two methods of solid waste

management. This is reflected by the higher (preferable) position of both volume reduction at the source and recycling in the state established hierarchy than incineration with energy recovery. Conditions which affect the cost of the waste-to-energy technology have changed somewhat since 1991. The additional regulatory requirements for pollution control technology and ash testing have added to the cost of waste-to-energy.

Landfilling is estimated in the 1991 Plan to be significantly less expensive than incineration. In 1995, this conclusion is still valid for Will County. For example, the Robbins Resource Recovery Facility under construction in Southern Cook County is reportedly offering a tipping fee of \$56.74 at startup in 1997 for mixed waste processing for recyclables removal, incineration with energy recovery, and landfill disposal of process residue and ash. On the other hand, tipping fees are at \$8.60 per cubic yard in 1995 at the CDT Landfill (\$28.38 per ton), and average \$26.02 per ton statewide (Solid Waste Digest, Midwest Edition, May 1995). Additionally, the lower capital costs and the timing of capital costs involved with landfilling allow for the consideration of additional processing and volume reduction facilities at different periods in the life of the facility. The construction of an incinerator requires a large capital investment prior to construction. Because of this, an incinerator will suffer adverse economic consequences if solid waste is not processed at expected levels. This may run counter to successful volume reduction programs.

For these reasons, incineration with energy recovery will not be a part of this Plan Update. It is recommended that the costs of incineration with energy recovery should not be revisited at the next update of this plan because of the County's proposed landfill. If, however, the County's landfill does not materialize at the time of the next five-year plan update, then issues of incineration with energy recovery and/or incineration for volume reduction should be revisited.

Incineration for Volume Reduction

Incineration for volume reduction was found to be prohibitively expensive in the County's Interim Solid Waste Management Plan. The economic reasons continue to exist, therefore, incineration for volume reduction is not part of this Plan Update.

Landfilling

As the solid waste management alternative at the bottom of the established hierarchy, landfilling is considered the management alternative of last resort. The material to be landfilled is that material which may not be reasonably removed from the wastestream. Volume reduction and recycling goals established in previous discussions in this Plan Update will significantly reduce the amount of material to be disposed of in a landfill. Based on the worst case (no recycling) evaluation in Section VI of this Plan Update, capacity for approximately 70.5 million cubic gateyards of solid waste will be necessary for the 25 year planning period. If volume reduction (including recycling) programs are more successful than anticipated, required disposal capacity will be less.

To assure that adequate landfill disposal capacity will exist at a reasonable cost for solid waste generated in Will County, the County will develop, with the private sector, a sanitary landfill. At this time, because incineration will not be a part of this Plan, an ashfill will not be necessary. If at a later date, incineration is made a part of the County Solid Waste Management Plan, an ashfill will be considered. This Will County facility will be adequate to serve the disposal needs of all of Will County and those portions of municipalities in Will County which are in other counties. This geographical area will be known as the Will County Service Area. The landfill will be generally sized for 20 years (minimum) of disposal capacity based on the worst case scenario for the Will County Service Area. Interim disposal capacity for solid waste generated prior to the proposed County Landfill being opened will be required and may be provided by either the selected private contractor and/or by the operators of other waste disposal facilities already located within Will County.

The sanitary landfill will be intended primarily for the disposal of waste generated in Will County. The sole exception to this is that municipalities that are partly in Will County may elect, in accordance with the terms of the solid waste agreement, to dispose all of their solid waste in the Will County facility. The proposed landfill will accept such municipal waste from the Will County Service Area that is not managed or disposed of by other components of the system.

The Landfill/Ashfill report of the Plan (Volume VI) includes a site selection process developed by the County, its advisory committees, and consultants. The site selection process has been implemented and resulted in the selection of the most appropriate site for a sanitary landfill in the County based on the criteria. The County conducted four public presentations in the spring of 1990, to discuss the siting process. Notice of the meetings was published in local newspapers.

The County has selected a site (455 acres) located on a portion of the Joliet Arsenal south of the City of Joliet in Florence Township. The site is currently owned by the U.S. Army. Legislation to transfer the site to the County has been enacted by both the U.S. House of Representatives and by the U.S. Senate. The legislation has passed and was signed by President Clinton on February 10, 1996.

The County has issued a Request for Proposals to private contractors to design, finance, permit, construct and operate a landfill facility at the Joliet Arsenal site, or at another site. However, the County will own the Joliet Arsenal site, or, if selected, the alternative site. The selected contractor will be responsible for acquiring all state and local permits for the development and operation of the facility and must meet the environmental standards imposed by the regulatory agencies. The private operator will be required to provide an adequate insurance policy to indemnify participating municipalities and townships from environmental damage liability. Interim and final facilities should be economically beneficial (i.e., the implementation of an appropriate host benefit fee) and environmentally sound for the County.

Proposers must also provide an interim disposal facility to provide capacity for disposal beginning January 1996 until the new final disposal facility is operational (expected in 1999). Proposers are also to identify a back-up site for disposal just in case the need arises.

The County's interim disposal capacity needs may be accommodated in a variety of ways. These range from the provision of interim disposal capacity provided by the successful bidder to the provision of interim disposal capacity from an existing and/or expanded Will County landfill or a combination of both. The County is aware that interim capacity in Will County should be encouraged in order to retain revenues generated to the County from the State of Illinois tipping fee surcharge and to provide the disposal capacity necessary to serve the County's needs while awaiting siting and permitting of the proposed County Landfill.

The County will not impose "flow control" in the system. The intergovernmental solid waste agreement will permit municipalities and townships to join if desired or to discontinue participation with one year written notice, without penalty. The landfill operator will be allowed to receive waste from outside the Will County Service Area provided that at least twenty (20) years of capacity are guaranteed to meet the waste disposal needs of the Will County Service Area, and the contractor does not exceed the annual waste receipts imposed by the County. Tipping fees will be based upon the "market rate" calculated as the average tipping fee from ten other landfills in the region. Participating municipalities and townships will receive a discount off of the market rate.

The County expects to receive proposals and make a selection of a contractor by the end of 1995 or early 1996.

Section X - Household Hazardous Waste

Household hazardous wastes (HHW) are increasingly being handled separately in solid waste management systems. Removal of HHW from the waste stream reduces the potential for future contamination problems in sanitary landfills and other non-hazardous waste disposal facilities. HHW collection programs can also increase the likelihood of recycling and reusing discarded HHW products.

The 1991 Plan indicated that the County would conduct at least three household hazardous waste (HHW) drop-off programs annually and implement an educational and awareness program. On November 19, 1994, the County conducted its first HHW drop off day at two locations in the City of Joliet. Almost one-half of the materials collected were paints. Other acceptable HHW included: insecticides, old gasoline, pool chemicals, cleaning products, used motor oil, lawn chemicals, solvents, antifreeze, hobby chemicals, aerosol products, and other common household hazards. Non-acceptable waste included lead-acid batteries, agricultural chemicals, and farm machinery motor oil. Table 10 summarizes the results from each location.

Table 10
HHW Drop Off Day Results¹
November 1994

	Locations		Total
	Joliet Junior College	Will County Health Dept. Complex	
No. 55 gal Drums:			
Paints	65.27	22.50	87.77
Oils	16.60	7.75	24.35
HazWaste Liquids & Solids	26.56	12.09	38.65
Organic Poisons & Pesticides	12.09	2.09	14.18
Miscellaneous ²	<u>25.46</u>	<u>10.09</u>	<u>35.55</u>
Totals	145.98	54.52	200.50
Households Participating	832	175	1,007
Total Cost	\$103,679.29	\$48,879.29	\$152,558.58
Cost Per Household	\$124.61	\$279.31	\$151.50

Notes:

¹ Source: Illinois Environmental Protection Agency.

² Includes flammable solvents, inorganic poison solids, corrosives, oxidizers, aerosols, and other.

Will County had 116,933 households eligible to participate in the HHW drop off day. Based on attendance, less than one percent of the households participated. This is typical for first-time HHW collection programs. From the participant survey results, advertising through the newspapers and with flyers reached the most people. To increase participation, methods to expand the impact of these two advertising mediums should be explored.

The County plans to conduct at least one HHW drop-off day annually through the County's landfill contractor at the contractor's cost. Two additional HHW drop-off events may be held with funding from the IEPA. The past HHW drop-off day was sponsored and funded by the IEPA in the form of a grant. The educational and awareness aspect of the HHW program may be included with the educational activities described in Section IX.

Section XI - Transfer Stations

To maximize the efficiency of solid waste collection and recycling, the development of a single facility to serve the disposal needs of the County will require transfer stations. The location of necessary transfer stations are totally dependent upon the location of the disposal facility.

Once either the Joliet Arsenal or an alternative site is selected, the need for transfer stations will be determined based on the following criteria: location of the disposal facility relative to areas of significant solid waste generation and the related travel distances, travel times and tipping fee differences between the transfer stations and the proposed landfill. This assessment is essentially an economic decision. For example, industry standards typically call for a haul distance of no more than 20 to 25 miles to a disposal facility for a standard packer collection truck. It is expected that new transfer stations will be required in the northern and eastern portions of the County.

Financing of the assessment, the site selection process, permitting, development and operation of a transfer station(s) will be borne by the selected private contractor. Recycling at these transfer station(s) will be encouraged. Locations for any required transfer stations will be subject to the local siting approval process and to review and approval by the IEPA.

Section XII - Collection in the Unincorporated Areas

As discussed in Section IV of this Plan, solid waste collection in the unincorporated areas of the County is not franchised. This has not changed from the 1991 Plan. To date, no township has conducted the necessary referendum to franchise collection within a township. It is recommended that solid waste collection for residential properties with less than four units in the unincorporated areas be franchised by the County. The process would include competitive bidding and result in collection services similar to those offered in most municipalities in the County.

In the 1991 Plan, an informal survey of collection rates in unincorporated areas showed that franchising solid waste collection would not likely increase disposal cost. Rather, franchising would likely result in decreased collection costs for residents in unincorporated areas. Additionally, by franchising collection in unincorporated areas, curbside recycling collection may be offered where population densities can support the service. Options of curbside recycling collection or drop-off recycling facilities may be

more readily provided with franchising. General drop-off recycling centers located in municipalities currently serve various unincorporated areas.

Section XIII - Plan Revision and Update

This first five-year Plan Update has revised and updated population projections, waste generation, current recycling and disposal practices, and disposal needs from the 1991 Plan. The technologies for recycling, composting, and waste-to-energy were not reevaluated in detail in this Plan Update.

This Plan Update will be revised and updated at a minimum of five-year intervals. If drastic changes occur in legislation, population/employment projections, waste generation rates or disposal needs, the County will revise this Plan Update, if necessary. Future updates will involve an analysis of progress towards attainment of volume reduction goals and a review of technologies intended to reduce the volume of material permanently disposed of. In addition, future updates of the Plan may also include the final configuration of the new landfill facility following its development.

WILL COUNTY SOLID WASTE PLANNING PROGRAM UPDATE

General Planning Guidelines

Update of SWMP passed in January 1991

- Systems to process solid waste generated in Will County Service Area (WCSA).
- WCSA to include all townships within Will County and all municipalities that are either fully or partly within Will County.
- Municipalities in Will and another County may include their total municipality in Will County System.
- System to process all solid wastes except medical waste, nuclear waste, hazardous wastes, and waste legally disposed on-site by generators (exceptions may exist, for example, fly ash, and sludge which may be disposed of by land application).
- Planning horizon by 1996 to 2020.
- System to include Interim Landfill until Final Landfill is in operation.
- The processing methods of preference are, in descending order: volume reduction, recycling, incineration with energy recovery, incineration for volume reduction, and landfilling.
- Unproven technologies will not be considered.
- Recycling and waste reduction methods to remain the same.
- Landscape waste to be composted or applied to land.
- Processing facilities (recycling) will not be developed by the County unless or until markets for products are available or can be created consistent with facility development in a timely manner.
- County to promote (through education) the use of products containing recycled material as much as possible.
- Landfill to accept such waste in the System that is not disposed of by other components of the System.
- Landfill will be sized for worst case scenario (landfill as only method of disposal).
- System to be controlled by County but developed, financed and operated by private sector.

- System to be economically beneficial and environmentally sound for the County.
- Will County to meet the planning requirements of the Solid Waste Planning and Recycling Act.
- Environmental standards to be those imposed by regulatory agencies.
- System to have a minimum 20 years life.
- System to have a back-up site (of the private operator) just in case needed.
- Private operator to have adequate insurance to indemnify participating municipalities and townships from environmental liabilities.
- System to have no flow control of waste. Municipalities and townships to have the freedom to join or not to join, or to discontinue participation with one year written notice, without penalty.
- Household Hazardous Waste collection to be at least once a year with potential for two additional collections with available funding.
- System to charge participating municipalities and townships a lower tipping fee than average going rate.

Supporting Documents

The following documents from the 1991 Plan have remained unchanged. All revisions that effect these supporting documents are contained within this Plan Update.

Volume II	-	Generation Rates Update
Volume III	-	Volume Reduction
Volume IV	-	Recycling & Landscape Waste Management
Volume V	-	Waste To Energy Feasibility Study
Volume VI	-	Landfill / Ashfill
Volume VII	-	Public Comments and Responses (from 1991 Plan)

The public comments and responses to this Plan Update are contained in Attachment 3.

Public Comments and Responses

Public comments were received on the general planning guidelines (Attachment 1) during September 1995. A public information and comment meeting was held on October 2, 1995 for the Plan Update. Will County States Attorney Cynthia Campbell, Will County staff and consultant HDR Engineering, Inc., attended the meeting. Additional public comments were received orally at this meeting on the Draft Will County Solid Waste Management Plan Update. The draft Plan Update was issued in November 1995. A 60-day public comment period commenced from November 1995 to January 1996.

The written comments below are on both the guidelines and draft Plan Update. The comments are written in bold type. The written comments and responses are divided by the individual or organization responsible for the comment. In some cases an individual or organization commented on the guidelines in September 1995 and the draft Plan Update in January 1996. Responses to the oral comments follow the written comments and responses on the guidelines.

Thomas Augustine, CAPE Chairman (September 1995)

The Will County Ground Water Monitoring that provides for the sampling and testing of water from landfill test wells for priority pollutants twice yearly should be included in the Will County Solid Waste Management Plan.

The Plan Update includes a paragraph on the groundwater monitoring program in Section V (page 12).

The original plan provided for three household hazardous waste collections annually. The county now proposes to reduce the number of household hazardous waste collections to one per year. We oppose this change...We are informed that the State funds to support household hazardous waste collection in Will County are restricted. This puts Will County at a particular disadvantage when you are about to try to convince people near the arsenal that all measures are being taken to insure the safety of the installation. Our advice is this: Don't cut the goal to fit the funds; the goal should fit the problem.

The County will conduct at least one household hazardous waste drop-off day annually through the County's landfill contractor at the contractor's cost. Section X of the Plan Update, as revised, also indicates two additional collection days may be held with funding from the IEPA.

Mary Margaret Cowhey, Land & Lakes Company (September 1995)

1. The Update materially changes the original Solid Waste Management Plan without Authority.

The Solid Waste Planning and Recycling Act (Act) provides very little guidance on plan updates. The Act requires that: "Each county waste management plan shall be updated and reviewed every five years, and any necessary or appropriate revisions shall be submitted to the Agency for review and comment." The attached IEPA letter dated September 27, 1995 has indicated that "counties may prepare their updates in whatever format best suits their resources." The County believes it has adequate authority to develop the Plan Update. Also, the attached IEPA letter dated December 14, 1995 has indicated that the County's draft five-year update has been completed in accordance with the provisions required in the Solid Waste Planning and Recycling Act (SWPRA).

The 1991 Plan has been updated and revised as necessary. Where no changes are required, the language in the 1991 Plan remains unchanged in the Plan Update.

2. The Update violates the rights of Land and Lakes and others, including the municipalities within Will County, regarding the selection and operation of waste management facilities.

The 1991 Plan indicated the desire to establish a County landfill to provide disposal capacity to Will County. As written on page 28 of the Plan Update, requests for proposal to design, finance, permit, construct and operate a landfill facility have been issued by the County for competitive bid. The Plan Update also states that the system will have no flow control of waste. The municipalities and townships will have the freedom to dispose of waste at the proposed County landfill pursuant to an intergovernmental agreement or to elect to dispose of waste elsewhere. The contractor will be able to balance the waste deficiencies with waste imports. None of the above violates the rights of contractors or municipalities.

3. The Update unlawfully eliminates the desired goals of source reduction and recycling.

The Plan Update does not eliminate the desired goals of source reduction and recycling. The top processing methods of preference are still volume reduction and recycling. Both the 1991 Plan and Plan Update states a recycling target of 30 percent of MSW within five years of adoption of the 1991 Plan and 40 percent within 10 years. The County further commits to a recycling goal of 50 percent of MSW within 15 years of the adoption of the 1991 Plan (see page 21 of Plan Update). The County has already met the 30 percent goal.

4. **The Update improperly attempts to codify Will County's historic deviation from the provisions of the Plan.**

It is unclear what "historic deviation" refers to, but the Plan Update contains the necessary and appropriate revisions based on the data and experience of the past five years. The Act allows counties to adopt such necessary and appropriate revisions.

5. **The Update fails to conform to the constitutional prescriptions of the United States Supreme Court.**

Again, the Plan Update specifically states no flow control by the County. This does conform to the constitutional prescriptions of the U.S. Supreme Court.

6. **The Update does not allow for public participation and comment in the planning process as is required by the Solid Waste Planning and Recycling Act.**

The Act does not require public participation or comment on plan updates. However, a public information and comment meeting was held on October 2, 1995 on the draft Plan Update for the purpose of receiving comments on the "General Planning Guidelines" in addition to written comments received. At this meeting, a summary of the Plan Update was presented. In addition, the County has made available for public comment a draft of the Plan Update.

Also, please see IEPA's two letters mentioned above under the response to Land and Lake's comment no. 1, which state that the requirements of SWPRA have been met.

7. **The Update was issued without adequate time for Land and Lakes, or any other entity, to respond in a meaningful way. The Solid Waste Planning and Recycling Act requires that the five-year update/revision process should mirror the initial plan drafting process. At a minimum, this would require continuing participation by advisory committee members during the update/revision process, provision of written notice of the proposed Update to appropriate persons and municipalities, and a ninety-day written public comment period. This process was not followed in the preparation of the Update. Consequently, the Update is inherently inconsistent with the terms of the Plan and fails to address the needs of the communities within Will County.**

The County chose to issue the revised guidelines (Attachment 1) to municipal and technical advisory committee members for review and comment. These comments are based upon the guidelines, not the Update.

The Act does not designate the process a county should follow in completing revisions, or the required content of plan updates. The plan update is not required to mirror the initial process. Therefore, IEPA has recognized that counties may prepare their updates in whatever format best suits their resources (see the attached letter from IEPA).

8. **The Update contains little substantive information, thereby it precludes meaningful comment. The Solid Waste Planning and Recycling Act requires that the update/revision process include updates of all aspects of the Plan, including; solid waste generation information and forecasts; disposal information and forecasts; identification and status of existing and anticipated solid waste disposal facilities to be located within the County; the advisability of the chosen planning strategy; the anticipated time schedule for implementation of the proposed plan; and other information specifically required by that Act. Moreover, the Plan itself states that, at a minimum, this update/revision must include "an analysis of progress towards attainment of volume reduction goals and a review of technologies intended to reduce the volume of material permanently disposed." The Update contains none of the requisite information.**

This comment actually refers to the revised General Planning Guidelines, not the Plan Update. The planning guidelines are just that, stated guidelines. The Plan Update does contain updates of solid waste generation information and forecasts (Section III); disposal information and forecasts (Sections V and VI); and identification and status of existing and anticipated solid waste facilities to be located within the County (Sections IV, V, IX, and XI). Any revisions to implementation schedules of plan items are contained in Section IX-Recommended Solid Waste Management System. Table 9 of Section IX also presents the progress towards the recycling goals.

9. **The planning horizon is a revision of the Plan. Thus, the assumptions and premises underlying the entire Plan (e.g., waste generation rates and totals, alternative disposal capacity, etc.), require reevaluation, including an opportunity for public participation and comment.**

The Plan Update does include revisions to waste generation and disposal capacity to correspond to the updated planning horizon. It is natural to extend the planning horizon by five years at this five-year update to always plan for a 25 year period.

Opportunity for public comment was provided through a public information and comment meeting held on October 2, 1995, and through written comments on the draft Plan Update.

10. **The concept of an “Interim Landfill” is undefined in your letter and is not mentioned in the Plan. Therefore, additional information is required to allow for meaningful public review and comment.**

The interim disposal facility is discussed on page 28 of the Plan Update. From Tables 7 and 8 in the Plan Update, the County will most likely require interim disposal capacity prior to the anticipated start of operation of the proposed County landfill.

11. **The Plan provided that “failure by the County to provide disposal capacity for parties to the solid waste agreement will result in the revision of this plan.” The site selection process set forth in the Plan failed. Also, Will County municipalities failed to agree to the County’s proposed solid waste agreement. Thus, at a minimum, the Update should include information concerning the status of the solid waste agreement, identification of any municipalities or townships which have signed the agreement, and a current version of the proposed agreement.**

On the contrary, the site selection process has been implemented and resulted in the selection of a site located on a portion of the Joliet Arsenal. The County is now in the process of reviewing proposals and selecting a contractor to provide interim disposal capacity and design, finance, permit, construct and operate a final disposal facility within the County. See pages 27 to 28 of the Plan Update for the discussion on landfills.

No municipalities or townships have signed the solid waste agreement at this time. The current draft of the solid waste agreement is described in Section VII of the Plan Update. The intergovernmental agreement will be completed after selection of a contractor for the landfill and negotiation of a construction and operation agreement.

12. **The guidelines state “Processing facilities (recycling) will not be developed unless markets for products are available or can be created consistent with facility development in a timely manner.” It is irresponsible for the County to impose this type of institutional obstacle to the development of recycling facilities, especially in light of the unambiguous legislative mandate that counties create no recycling impediments and actively encourage and promote the development of recycling systems.**

The guideline will be clarified to read “Processing facilities (recycling) will not be developed by the County unless or until markets for products are available....” The County does not intend to preclude private companies from implementing recycling facilities. The County has actively encouraged and supported recycling. Currently, recycling occurs at three transfer stations and a material recycling facility in the County and will occur at the new transfer station under construction.

In addition, yard waste composting occurs at four permitted facilities and land-application at three farms.

13. **The guidelines state “System to be economically beneficial and environmentally sound for the County.” We [Land & Lakes] understand that it is the County’s hope that its planning efforts will provide an economically beneficial system, but this point suggests that the economic benefit aspect is to become a requirement of the Plan. This clearly contradicts legislative mandates.**

The above statement is a guideline and is identified as a guideline, not a requirement.

14. **Guidelines state “System to be controlled by County but developed, financed and operated by private sector.” This is a sharp departure from the Plan, which contemplated County development and financing of the system. In fact, pursuant to the Plan, the County itself was to undertake all obligations for site selection, site purchase, local siting approval pursuant to SB 172, and development permitting. Further information is required to explain this departure.**

The County has undertaken site selection and started the process for transfer of legal ownership of the Site to the County (page 27 of Plan Update). The 1991 Plan did identify that a private contractor would design, construct and operate the proposed County landfill, while the County owned the site. The only departure from the 1991 Plan is that the County has transferred the facility financing and permitting onto the private contractor.

15. **The following guideline is unclear: “Will County to meet the planning requirements of PA 85-1198.” PA 85-1198 is the Solid Waste Planning and Recycling Act itself, pursuant to which, presumably, this Update is being disseminated. What additional compliance is anticipated? It should be stated, however, that the proposed Update and the County’s failure to implement the Plan suggest non-compliance with PA 85-1198.**

This guideline has not changed from the 1991 Plan. Linda Hinsman from the IEPA has suggested using the Solid Waste Planning and Recycling Act instead of PA85-1198 (see IEPA comment below). This change will be made.

No additional compliance is anticipated. The Plan Update complies with the guidance of the Act. Numerous plan components have been implemented.

16. **The following guideline is unclear: “Environmental standards to be those imposed by regulatory agencies.” Is it the County’s position that compliance with state and national environmental regulations for the protection of public health, safety and welfare will satisfy all obligations of facility siting, design, development, operation and closure?**

This guideline does not preclude compliance with local regulations. Solid waste management facilities must meet local, state and federal regulations. For example, landfill sitings must meet the minimum requirements established in the site selection process in the 1991 Plan.

17. **The guidelines state: “System to have a back-up site (of the private operator) just in case needed.” The “back-up site” concept is neither defined nor mentioned in the Plan. Therefore, additional information is required to allow for meaningful public review and comment.**

The County intends to include in a contract with the landfill operator the requirement that the contractor provide for disposal of waste from users at a back-up facility if the final landfill site is not operating within the contract term for any reason. This is the meaning of “back-up site”.

18. **Among other things, your twenty-second point provides for “municipalities and townships to have the freedom to join or not to join, or to discontinue participation with one year written notice, without penalty.” However, Attachment 2 to Volume I of the Plan provides that signatories to the solid waste agreement may only withdraw with the prior approval of the “policy Board” and upon payment of the greater of \$100,000 or five times the amount of fees paid by the participant during the preceding twelve months. Further information is required to evaluate this significant departure from the Plan.**

The 1991 Plan indicated that the Attachment 2 was a draft agreement only. The draft of the solid waste agreement has been revised many times since the 1991 Plan. Section VII of the Plan Update describes the current draft of the solid waste agreement. Also see response to comment #11 above.

19. **The guidelines state: “Household hazardous waste collection to be once a year.” The Plan provided for three household hazardous waste collections each year. Please comment upon the reasons for, and the effect of, this substantial modification of the Plan. Also, please explain whether any other modifications are anticipated. For example, is it still contemplated that the household hazardous waste collection will be conducted by the County?**

See response to comment from Thomas Augustine, CAPE Chairman. No other modifications are anticipated. The County is one of the many sponsors for the HHW collection day.

20. **Subsequent to adoption of the Plan, the United States rendered its decisions in Ft. Gratiot (prohibiting counties from restricting importation of garbage) and C.A. Carbone (outlawing local attempts to control where waste is disposed). The Update appears to be unconstitutional because it contains impermissible flow control restrictions. Moreover, the middle paragraph of page 12 of Volume I of the Plan suggests flow control.**

The Update process should be used to evaluate the Plan in light of the constitutional prescriptions set forth in Ft. Gratiot and C.A. Carbone. The Update fails to do so.

Both the guidelines and Plan Update state “no flow control” of the system. Refer to pages 13, 14, 18, 27 and 28 of the Plan Update. The paragraph referenced above has been revised in the Plan Update.

Jim Shapard, City of Joliet (September 1995)

The Guidelines state “System to process all solid wastes except medical...and waste legally disposed on-site by generators...” Does this include yard waste?

Yes. Mulching and backyard composting by residents would not be considered part of the waste stream. Within the system, yard waste is currently composted (processed) at four permitted facilities and land-applied at three farms.

Processing facilities (recycling) will not be developed unless or until markets are available...

This is a good suggestion. The words “or until” will be inserted into this guideline.

How is the County to promote (through education) the use of products containing recycled material as much as possible?

The discussion of updated programs can be found in Section IX of the Plan Update (pages 20 to 21).

Is the landfill to be sized for the worst case scenario the 425 acres?

The selected site at Joliet Arsenal is actually 455 acres. This site is anticipated to be able to provide capacity for the worst case scenario for at least 20 years. Actual disposal capacity will depend on final design of the landfill.

The guidelines state “System to have no flow control of waste. Municipalities and townships to have the freedom to join or not to join, or to discontinue participation with one year written notice, without penalty.” Suggest adding that the operator can take waste from outside the County if it’s necessary to make it work.

Page 28 of the Plan Update does mention that the landfill operator can receive waste from outside the Will County Service Area “to make it work.”

Why not include the formula for the lower tipping fee for participating municipalities and townships? This seems to me to be the key in getting communities to sign on.

The agreement has not yet been finalized or executed. The tipping fee is generally described as part of the solid waste agreement features on page 18 of the Plan Update.

Jim Ford, Northeastern Illinois Planning Commission (September 1995)

It would be helpful to have a summary of the elements of the plan which will be subject to updating.

See response to Land & Lakes comment no. 8. An executive summary will be included with the Plan Update.

It would be helpful to have the analysis of current performance and conditions on which decisions to continue or not to continue programs were based.

The current system and updates are described in Sections IV, V, VI, IX, X and XI of the Plan Update.

Recycling and household hazardous waste collection would seem particularly appropriate areas for an updated review of alternatives, given changes in technology and market condition since 1991. The 1991 plan did call for a review of the incineration option at the time of the five-year update.

The analysis and conclusions reached in the technical reports (Volume III to VI) remain unchanged in this Plan Update. Recycling technologies to be utilized are the choice of the private collection companies who bid for the service to municipalities. Household Hazardous Waste collection technologies are also the choice of private service providers retained for the collection days.

Incineration with energy recovery was reviewed. This option is still more expensive than landfilling at the time of the Plan Update.

Will the County continue to seek intergovernmental service agreements with the municipalities? What if any role will municipalities play in defining the terms of the private operator agreement?

The County will continue to seek intergovernmental solid waste agreements with the municipalities. The current draft, described in Section VII of the Plan Update, shows advantages to the participating municipalities and townships. The municipalities, through their County Board representatives will participate in defining the final terms of the private operator agreement. While this is a change from the original draft of the inter-governmental agreement in the 1991 Plan, this change was made at the request of the municipalities during a public meeting between the County and municipalities.

Linda Hinsman, Illinois Environmental Protection Agency (September 1995)

Because the Solid Waste Planning and Recycling Act (SWPRA) requires the development of a plan for the management of municipal waste, the guidelines should reference only municipal waste, not solid and special waste.

The guideline will be revised to reference municipal waste.

Use SWPRA instead of P.A. 85-1198; most people probably don't know what PA 85-1198 is.

This is a good suggestion. The guideline will be revised to read "Will County to meet the planning requirements of the Solid Waste Planning and Recycling Act."

Jim Zelko, Will County Health Department (September 1995)

Does the back-up site requirement limit the operators who will bid to operate the site?

The four contractors deemed most qualified to provide the service all have the ability to provide back-up disposal sites.

Thought that flow control was a part of the original document whereas the revised guidelines state "System to have no flow control of waste." What if the high volume users opt out?

Due to the recent decision by the U.S. Supreme Court in C.A. Carbone and other cases, the County has revised the text from the 1991 Plan to remove flow control in the Plan Update. The future landfill operator will be permitted to receive waste from outside the Will County Service Area to the extent that municipalities and townships within the Will County Service Area elect not to direct waste to the facility.

Is charging the participating municipalities and townships a lower tipping fee than the average going rate legal?

The County believes that reasonable fee arrangements, including a discount for participants to the intergovernmental agreement, a permissible contract element.

Catherine Blair, Sauk Calumet Group of the Sierra Club (September 1995)

Perhaps some standards can be up graded. In the four years just past we have seen recycling bins all over the south suburbs for door to door pickup every week. Can we get more items to be picked up such as junk mail paper products?

Currently, materials such as newspapers, aluminum cans, ferrous cans, glass and plastics are recovered and delivered to markets. Sustainable markets for materials such as junk mail do not exist at this time. Without a market, those separated materials may end up in a landfill. More materials may be added to the collection list as markets for those materials develop.

Dale Patterson, Trustee, Village of Monee (September 1995)

Strongly object to the planning guideline “Unproven technologies will not be considered.” Research and development should be considered.

This guideline means that unproven technologies will not be considered for full-scale implementation. Developmental technologies will be monitored and must demonstrate applicability in pilot programs and full-scale programs prior to serious consideration. The guideline will be clarified to read “Unproven technologies will not be considered by the County.” The County does not intend to preclude private companies from research and development at their own expense.

The following comments were received verbally in the October 2, 1995 public information and comment meeting.

- **How will the County guarantee that space will be available for participating municipalities over a 20-year period in the proposed county landfill? Will users outside the Will County Service Area be able to force the County to allow them to use the facility?**

The agreement with the private operator will require the operator to reserve capacity (up to the annual maximum) for participating municipalities and townships. Only capacity not used by these participants will be made available to non-participants. The County does not believe that others can force the County to change its agreement with participants and a private operator.

- **Should the county have a provision in the contract with the operator to get out of the agreement if technology changes over 20 years to make a more cost effective disposal method?**

The Agreement will contain a provision in which the user fees will reflect the prevailing market value. If, in the future waste disposal technology changes such that lower cost alternatives are on the market, presumably such lower costs will be reflected in the market price in the region.

- **If private financing is to be used, the borrowing rate may be greater than if government-backed bonds are used for financing.**

While the borrowing rate for private financing may be greater than public financing, the advantages to the County and municipalities include: less financial risk to the public users of the facility; and the ability to use the public borrowing capacity for other public purposes.

- **How will the County know if waste tipped at a transfer station all originates from the participating municipalities?**

The County agrees that the operation agreement should provide a mechanism for reporting the source of the waste to the County.

- **What will happen if the annual waste quantity from the Will County Service Area exceeds the annual maximum capacity of the landfill?**

The County has sized the landfill conservatively large, in order to reduce the risk of underestimating waste generation. The Plan Update states that the landfill is sized for the worst case scenario in which no recycling occurs in the County. The existing recycling rate is over 30 percent.

- **When will the new landfill be available for use?**

The County projects that sometime in the year 1999, the facility will be available for use. Financing, design, permitting, and construction may take more or less time than expected, and may influence this schedule.

- **Will the intergovernmental agreement be signed before awarding the contract for design, construction and operation of the landfill?**

No. In earlier drafts of the intergovernmental agreement, it was provided that the agreement would be executed and the municipalities would participate in the selection of an operator. However, the majority of municipalities attending a public meeting with the County stated that they preferred the County performing this task alone.

An Intergovernmental Agreement will be presented to the municipalities and townships after a contract is signed with the Operator.

Thomas Augustine, CAPE Chairman (January 8, 1996)

1. **The Will County Board should revise the Will County Solid Waste Management Plan by banning the siting of waste incinerators in Will County.**

This Plan Update does not include waste incineration with energy recovery or waste incineration for volume reduction. However, it is not recommended to exclude one of the solid waste management options for future consideration by a ban. Waste incineration should be reconsidered at following updates of the plan.

If waste incineration appears economically feasible in the future, then the environmental, social, and institutional impacts will be extensively reviewed at that time.

2. **CAPE gives tentative support to the proposal that the landfill owner-operator of the Will County Landfill be allowed to receive waste from outside the Will County area to the extent that Will County service area waste is exported outside for disposal, thereby balancing imports and exports. We would oppose any deviation from this practice. Our support is tentative depending on evidence that the procedure is being followed. This procedure would restrict both the total waste and the imported waste going into the landfill.**

Point noted.

3. **The Will County Solid Waste Management Plan should provide that no landfills will be cited in the county, and that there will be no expansion of existing landfill in the county after the Will County Landfill is cited.**

While the County believes that the Will County Landfill will address the needs of the Will County Service Area, it would be inappropriate for the County to incorporate a blanket prohibition against siting or expansion of other facilities.

4. **The Will County Solid Waste Management Plan should provide for at least three household hazardous waste collections each year. The plan should also provide that a permanent collection center for the collection of hazardous waste from households and from small quantity generators of hazardous waste be established.**

See response to the comment from CAPE (September 1995), and pages 28 and 29 of the Plan Update.

5. **The Will County Solid Waste Plan should clearly state that income from landfill tipping fees is to be used exclusively by Will County to accomplish the goals of the Will County Solid Waste Management Plan.**

The funds collected by the County as a surcharge, pursuant to state law (415 ILCS 5/22.15(j)), may only be used as defined by the law for solid waste management purposes. It is not necessary to include this in the Plan Update as the County is already limited by state law.

6. **The Will County Solid Waste Management Plan should continue to provide twice annual testing for priority pollutants at county landfills. This is a valuable service that provides an independent analysis that is much more detailed than the analysis that the landfill operators are required to supply to the Illinois Environmental Protection Agency.**

The Plan Update includes a paragraph on the groundwater monitoring program in Section V (page 12).

Ad Hoc Committee, Will County Governmental League (January 16, 1996)

1. **The Committee recommends that alternative landfill space be explored for the interim period. This may include extending the life of one or more existing landfills.**

The County has required that any operator which is ultimately awarded a contract to operate the County's landfill must provide an interim facility which may include the use of existing landfills.

2. **The Committee objects to the discontinuance of any source reduction measures on pages E-2 and E-3 of the Plan Update. These source reduction measures, such as educational campaigns for businesses and institutions, are important to the overall Plan and should not be discontinued based upon preliminary results or inadequate County staffing. All measures should be pursued with the necessary level of County support.**

Educational campaigns for businesses and institutions will be continued based on staffing levels.

3. **The Committee recommends that the lists on pages ii and iii of the Plan Update be revised to reflect current membership of both the Will County Solid Waste Municipal Advisory Committee and Will County Solid Waste Technical Advisory Committee. A list of current municipal officials is provided in the 1995-1996 Directory and Reference Book, Will County, Illinois compiled by Jan Gould, County Clerk of Will County. The League's representation on the Technical Advisory Committee should be changed from Richard Curran to Alan Anderson.**

Changes to the Municipal Advisory Committee have been made. Also, the League's representation on the Technical Advisory Committee has been changed to Alan Anderson.

4. **The Committee recommends that Table 2 (Will County Service Area Population) on page 5 of the Plan Update be revised to show current municipal populations. Will County municipalities with population increases since 1990 are identified in the attached NIPC chart entitled “Populations of Municipalities in Northeastern Illinois”.**

The 1990 Census data is the only data with the complete population for all of the municipalities listed in Table 2 and the Unincorporated Will County. The 1994 municipal populations from the NIPC data are forecasts. NIPC continues to indicate that the forecast revision process is underway and therefore, the County believes that the 1990 Census data should be used as a basis. The population and subsequent waste generation calculations will be revised in the next plan update when more accurate census data for the year 2000 can be used.

5. **The Committee expressed traffic and environmental concerns about the siting of any future incineration facilities. There was also agreement that incineration was not economically feasible (see Plan Update, page 26).**

See response to comment by Thomas Augustine, Chairman of Citizens Against a Polluted Environment (CAPE).

6. **The Committee expressed concerns that the proposed Will County Landfill may receive waste from outside the Will County Service Area. Committee members indicated that providing for Will County waste was the primary reason for the proposed County Landfill. The Committee had questions concerning the current statutory or caselaw authority for Will County to limit waste to the Will County Service Area. The possible importation of waste outside the Will County Service Area raises serious transportation and other concerns.**

See responses to comment from Jim Zelko of the Will County Health Department and comment no. 20 from Mary Cowhey of Land and Lakes.

7. **The Committee questioned the need for “flow control” intergovernmental agreements if the proposed County Landfill must accept waste from outside the Will County Service Area.**

Any intergovernmental agreement is not designed or intended as “flow control”. Rather, it is intended to implement the goals of the SWPRA in that it will guarantee space for a 20 year period for any participant to the agreement. As previously stated, the Plan Update neither requires that participation of local governmental units within the Will County Service Area, nor does it exclude waste from outside the service area to the extent space is available after the County meets its contractual obligations under the intergovernmental agreement.

Michael Pasteris, Forest Preserve District of Will County (January 10, 1996)

In the section on volume reduction (p. 20), it is unclear how educational programs are advertised, requested by the public or by municipal, commercial, or institutional groups, and evaluated to determine whether or not that program has been a success. More information here would be helpful.

Schools, organizations, businesses and the general public can call the County to request information on solid waste volume reduction. Information in the form of brochures and pamphlets will be kept on file for public use. The County promotes volume reduction through informational materials and/or appearances at the schools, organizational functions, fairs, and other community functions.

Item # 6 calls for eliminating an informational program because it is not or likely to be staffed. If this position was staffed, would the success in other educational programs improve (e.g. commercial and institutional groups? increase awareness of household waste disposal? etc.)? Can the existing coordinator (i.e., his/her designee function in this capacity?

Item #6 refers to the creation and staffing of an information source for County residents, businesses and institutions (Plan Update, p. 20). The current staff will continue the educational programs.

Is there some advantage to burning tires (p. 22)? Could the tires be recycled instead?

The tire collection event in 1993 was a one-time event. Tires as a fuel source is one method to handle scrap tires instead of landfilling. Current recycling options and markets cannot handle or provide markets for all of the scrap tires stockpiled and generated annually. Even burning tires for fuel only utilizes a portion of the scrap tires generated. The County will investigate other recycling options for tires collected in any future tire collection event.

Rolf C. Campbell & Associates, Inc. for CDT Landfill (January 10, 1996)

The Plan Update does not really anticipate how to accommodate the interim Will County waste disposal needs if siting the County Landfill at the Joliet Arsenal takes considerably longer or if additional time is needed to locate another County Landfill site.

The private contractor proposing on the County Landfill must provide an interim disposal facility to provide capacity for disposal until the new final disposal facility is operational. This may include existing facilities already located within Will County. See text revisions on pages 14, 27 and 28 of the Plan Update.

The Plan Update does not address the loss of County revenues if interim capacity is provided outside of the County and tipping fee surcharge revenues are lost by the County.

While the County has an interest in insuring that implementation of the Plan Update is economically beneficial to the County, the County's first priority is to provide available disposal space in the interim period for the Will County Service Area, whether it results in lost revenues or not. See page 28 for paragraph addition.

There is no rationale provided for why interim disposal capacity cannot be provided by a range of facilities including existing landfills, which may need to be expanded, and by the interim facility to be provided by the successful bidder.

The County has not foreclosed any alternative for interim facilities which may be proposed by contractors seeking to operate the County's landfill. Revisions to this affect have been incorporated into pages 14, 27 and 28 of the Plan Update.

Proposed text revisions (six items total) regarding landfill expansions are provided for consideration.

All landfill expansions will be considered in accordance with this Solid Waste Management Plan Update. Similar text revisions from Hinshaw & Culbertson have been incorporated.

John Mezera, City Manager, City of Joliet (January 2, 1996)

The last sentence in the second paragraph on page 27 of the Plan Update should be amended or stricken. An expanded CDT Landfill could continue to be an important and necessary facility until it reaches capacity. It is suggested that the County consider including an expanded CDT Landfill as an option consistent with the Plan Update.

Please see the responses to comments by Rolf Campbell and by the Ad Hoc Committee, Will County Governmental League.

Bruce Malec (December 1995)

The most significant change in the 1995 Update is the establishment of a “Will County Service Area” that includes all the municipalities that border Will County...The reason for doing this is not clear.

See response to comment by Stephen Hedinger on page 22.

The County must clearly evaluate each company’s ability to haul the minimum amount in the RFP (500,000 tons per year) to the new landfill. Of the four companies currently bidding the landfill project, the three losing companies will not utilize the new landfill and haul the waste they collect from the Will County Service Area to their own landfills. The tonnage generation from the Will County Service Area identified in the Plan Update will not all come to the new landfill.

Point well taken. It will be considered by the Landfill Proposals Review Committee.

Jim Ambroso, BFI (January 1996)

Suggested text changes on pages E-5 and 28 of the Plan Update. The change is as follows:

The landfill operator will be allowed to receive waste from outside the Will County Service Area provided that at least twenty (20) years of capacity is guaranteed to meet the waste disposal needs of the Will County Service Area and the contractor does not exceed the annual waste receipts imposed by the County.

The County desires to create a landfill primarily for Will County Service Area.

Edit to page 14: The current objective will be to limit the total amount disposed in the proposed County landfill, and to offer capacity first to the Will County Service Area.

Same response as above.

Susan Lynn Johnson, Environmental Counsel, City Management Corporation (January 16, 1996)

While the proposed Plan Update purports to recognize legal precedent and the “significant changes in flow control authority,” it nonetheless restricts the flow of waste generated from outside the Will County Service Area to the JAAP site “to the extent that Will County Service Area’s waste is exported outside for disposal.” This,

on its face and in effect, creates an unconstitutional preference for Will County Service Area waste, discriminating against wastes generated outside the service area, including interstate waste. This is clearly a violation of the commerce clause of the United States Constitution. Such discrimination was struck down in Michigan by the U.S. Supreme Court in Fort Gratiot Landfill v. Michigan Department of Natural Resources, 112 S. Ct. 2019 (1992). At the very least, Will County cannot restrict waste from out-of-state and therefore, and daily or annual volume restriction placed upon the JAAP landfill would not necessarily accomplish Will County's legitimate objective to ensure long term capacity for Will County. Moreover, restricting the size or receipt of waste by volume or origin at the JAAP landfill is not in the best interests of Will County, its residents or businesses...

The County has reviewed the caselaw and its effect (if any) on the SWPRA enacted by the Illinois General Assembly and the implementation of that law by the County's Plan. The County believes that its Plan Update comports with the requirements and limitations of each.

CESI's alternative proposal which allows the site to be developed to its full engineered design capacity without annual volume restrictions other than a guarantee to provide 20 years of capacity to Will County. The Plan Update should provide for the full development of the JAAP landfill site consistent with law and sound engineering practices.

The County believes its Plan provides the most beneficial method of complying with SWPRA without these significant modifications.

Proposed modifications to the Plan Update consistent with our comments and observations are attached.

The County desires to create a landfill primarily for the Will County Service Area.

Stephen F. Hedinger of Mohan, Alewelt, Prillaman & Adami for Land & Lakes Company (January 17, 1996)

- 1. The November 1995 document is not merely an "update" of the 1991 Will County Solid Waste Management Plan (hereinafter "1991 Plan"), but instead is a wholly new plan, and as such the entirety of the procedural activities mandated by Section 5 of the Solid Waste Planning and Recycling Act (hereinafter sometimes "the Act"), 415 ILCS 15/5, must be complied with. These requirements include, among other things, at least one public hearing and at least ninety (90) days for public review and comment.**

The November 1995 document is an update of the 1991 Plan. Refer to the response to comment #1 by Mary Cowhey of Land & Lakes. The attached IEPA

letter dated December 14, 1995 states that the IEPA “consider[s] submittal of [the] completed plan update form to be the plan update required by the law.”

- A. The “service area” purportedly covered by the new Plan is greatly expanded beyond that considered in the 1991 Plan. (This expanded “service area” also renders the new Plan illegal, as is discussed below; further, the concept of “service area” is not part of the Solid Waste Planning and Recycling Act, and so should not be included in this document).**

The SWPRA requires that the County address the “management of waste generated within its boundaries.” In expanding the service area, the County has included municipalities which are partly within the County’s boundaries, in an effort to include these municipalities in the Plan Update. These municipalities are free to chose to participate in either Will County’s Plan Update or the plan of another county. To suggest that municipalities which straddle county boundaries may not participate in a single county’s plan thwarts the purpose of the SWPRA.

- B. The new Plan has radically changed the basic approach to the landfilling option from a site to be entirely controlled and operated by Will County itself with direct oversight (via the “Policy Board”) by the involved communities and townships, to a landfill run by a private, for-profit corporation under a mere contractual arrangement with Will County and without any input from the involved communities and townships.**

See response to the last comment by Jim Ford, NIPC on page 10 and the response to the last verbal comment on page 13.

- C. The new Plan totally usurps the individual community input over the proposed facility that was a cornerstone of the 1991 Plan by abolishing the Policy Board (which was to have been made up of representatives of Will County’s communities and townships), placing sole authority over all Will County solid waste matters (including those relating to the proposed landfill) with the Will County Board. See new Plan, at 18 (last sentence).**

The municipalities requested the change from the original draft of the intergovernmental agreement during a public meeting with the County. The municipalities, through their County Board representatives will participate in defining the final terms of the private operator agreement. See response to the last comment by Jim Ford, NIPC on page 10 and the response to the last verbal comment on page 13.

D. The 1991 Plan called for the Will County landfill to rely upon waste streams from Will County alone (along with municipalities straddling the Will County border), and units of local government within Will County were expected to voluntarily commit to the use of the County's facility, subject to substantial penalties for withdrawing from that commitment. The new Plan, however, allows the units of local government to enter into and terminate the commitment to use the privately-run facility with no penalty and subject only to a one year notice provision. Apparently the private owner/operator of the facility will be permitted to accept out-of-county waste to offset any Will County waste sent to landfills outside of Will County.

Refer to page 28 of the Plan Update. See also the responses to comments by Mary Cowhey of Land & Lakes (no. 2), by Jim Shapard of City of Joliet (page 9), and by Jim Zelko of the Will County Health Department (page 11).

- 2. In addition to the above radical departures from the 1991 Plan, the procedural steps required by the Solid Waste Planning and Recycling Act must also be complied with as a result of the internal obligations set forth in the 1991 Plan. The 1991 Plan provided that in the event Will County failed to comply with its facility siting, development and operation obligations set forth therein, the County would revise the solid waste management plan, and not merely "update" that plan as was required by the Act in any event. (See 1991 Plan, Vol. I, at 30). Since Will County has completely failed to comply with its 1991 Plan obligations, the County must now pursue a new plan consistent with the Act.**

The Solid Waste Planning and Recycling Act requires that "Each county waste management plan shall be updated and reviewed every five years, and any necessary or appropriate revisions shall be submitted to the Agency for review and comment." The Plan Update contains the appropriate revisions. See response to comment no. 11 by Mary Cowhey of Land & Lakes.

- 3. The "service area" purportedly governed by the new Plan is unlawful. The Solid Waste Planning and Recycling Act expressly and explicitly limits the County's planning authority to the geographical boundaries of the County. However, the new Plan purports to impose Will County's planning process upon those persons who are citizens of municipalities straddling Will County's border, but who are not citizens of Will County itself. The new Plan must accordingly be corrected to limit its scope to within Will County's statutory authority. In fact, as a matter of fact (see IEPA's Eighth Annual Report, Available Disposal Capacity for Solid Waste in Illinois, at 18-19, Table 7) and of law (see 415 ILCS 15/4(a)), each of these communities not within Will County is already subject to a solid waste management plan, with which the new Plan likely will conflict.**

See IEPA's letters attached at the end. See also response to comment 1.A.

4. In addition to being an unlawful expansion of Will County's planning authority under the Act, the "service area" concept does not even exist in the Solid Waste Planning and Recycling Act, but to the contrary that Act expresses the policy "that counties should have the primary responsibility to plan for the management of municipal waste within their boundaries to insure the timely development of needed waste management facilities and programs." 415 ILCS 15/2(2) (emphasis added). The "service area" considerations in the new Plan are therefore improper and should be deleted.

Same response as above.

5. The expanded "service area" included in the new Plan has also resulted in numerous inconsistencies and logical errors, so that even if the expanded "service area" can remain a part of the new Plan, the Plan must be corrected in any event.

- A. The new Plan itself notes that "[i]ncluding the entire population of the border municipalities almost doubles the population base," and in fact this expanded service area increases the population base from the Will County Only total of 357,301 to the "Will County Service Area" total of 654,904 for the 1990 base year. See new Plan, at 6 and Table 4. Incredibly this near doubling of population somehow has been further magnified to justify an enormous increase in the size of the County's proposed landfill, without any explanation. The 1991 Plan, based upon Will County-only population, stated that to satisfy the planning horizon requirements, a landfill with 14.76 million cubic gateway capacity was required (1991 Plan, Vol. I, at 25). Now, in the new Plan, the County claims that 70.5 million cubic gateways capacity will be required (New Plan, at 27). No rationale can be discerned within the new Plan for the 5-fold increase in contemplated facility size, but instead the less than doubling of projected population suggest that at most some 28 million cubic gateways should be needed.

Nearly doubling the 1990 population base does not directly correlate to doubling the capacity requirement from the 1991 Plan. The following factors impact the calculations:

- The 1990 population is an estimate in the 1991 Plan; the Plan Update utilized the 1990 Census data which is greater than the estimate.
- The projected annual population growth rate in the Plan Update (based on NIPC data) is greater than the annual population growth rate utilized in the 1991 Plan.

- The updated population base and updated annual population growth rate both contribute to higher population projections and subsequently greater waste generation.
- The Plan Update extends the remaining capacity calculation to the year 2020 compared to 2015 in the 1991 Plan (5 years difference).
- The 1991 Plan calculated the 14.76 million cubic gateway capacity based on 50% recycling achieved by the year 2005. The 70.5 million cubic gateways is from Table 7 in the Plan Update which is the worst case scenario, no recycling. The 1991 Plan capacity should be compared to Table 8 which shows an estimate of remaining capacity in year 2020 of 35.6 million cubic gateways with 50% recycling (or more appropriately, 26.5 million cubic gateways in year 2015).

B. Although the waste generation rate for the population was increased by expanding the “service area,” no commensurate expansion was attempted for commercial/institutional wastes, construction and demolition debris, or industrial waste. See, e.g., new Plan at 7 (“Note this employment data applies to Will County only and not the extended Will County Service Area”). It is misleading and inconsistent to apply the expansion to only one portion of the calculations. Although the new Plan itself recognizes this discrepancy (see the last two sentences of the first paragraph under the heading “Waste Generation,” at p. 7), the new Plan does not attempt to justify or correct the discrepancy.

Commercial/institutional wastes, construction and demolition debris and industrial waste were all included in the waste generation rate with residential waste. (See Table 1 of the Plan Update). The last sentence of the first paragraph on page 7 states that the per capita waste generation rates from Table 1 will be used in conjunction with population projections. The above waste types are not excluded from the calculations.

C. The waste generation projections included in Table 5 are erroneous as a result of the expansion of the “service area.” Close to one-half of the “population” column of that Table is made up of non-residents, and yet the Residential Waste,” “Commercial/Institutional Waste,” “Construction & Demolition,” and “Industrial Waste” categories include only the assumed waste generation amounts for Will County, and do not take into account the varying waste generation estimates for counties other than Will. The correct waste generation rate based upon these overlooked factors is likely significantly different than that asserted by this new Plan.

From Appendix E in IEPA's Eighth Annual Report, Available Disposal Capacity for Solid Waste in Illinois, the surrounding counties report the following MSW generation rates:

Cook	7.20 pcd
DuPage	8.00 pcd
Kane	6.89 pcd
Kendall	6.03 pcd
Grundy	6.50 pcd

It is not known whether the MSW generation rates for the bordering municipalities outside Will County are the same as these county-wide estimates for the counties which include these municipalities. No data exist for the MSW generation rates for individual municipalities. It is not unreasonable to assume that the MSW generation rate for these bordering municipalities is the same as the rate calculated for Will County, because these bordering municipalities contain a similar mix of large and small municipalities with a roughly similar mix of residential and commercial/industrial land uses. Therefore, to provide a reasonable basis for calculation which is not unreasonably complex, the MSW generation rate for Will County was applied to the total population of the expanded service area.

- D. The new Plan discusses Will County's remaining disposal capacity, and compares that figure to the waste generation rates derived from the expanded "service area" included in the new Plan. (See new Plan, at 11-13). However, despite the expansion of the "service area" to beyond Will County's borders, the available capacity discussion is still limited to those sites located within Will County's borders. This is an egregious error; clearly this nearly doubling of the population by adding the full population of border communities must also consider the alternative capacity available to the new population included in the expanded "service area." This is especially critical since the private, for-profit landfill operator will apparently be given a credit for the entire waste generation assumptions from the expanded "service area."**

The County believes that the expanded service area closely approximates the current service area for Will County landfills, and therefore should be used for the calculation of remaining disposal capacity. Approximately 60% of the waste disposed in Will County landfills in 1994 came from sources within Will County (see page 13 of Plan Update). Table 4 (page 6 of the Plan Update) shows that population in Will County represents about 54% of the total expanded service area population, indicating a close match between Will County's portion of total population and waste disposed in Will County landfills.

It is reasonable to assume that a significant amount of waste from outside Will County will continue to be disposed in Will County landfills. The proportion of out-of-county waste may actually increase over the next five years due to the scheduled closing of both DuPage County landfills, and the Hillside Landfill in Cook County within the next two to three years. The alternative capacity available to bordering municipalities is expected to become even more limited than today, indicating that remaining capacity in Will County may be depleted even more rapidly than calculated in the Plan Update.

- E. The new Plan claims that the waste generation and recycling estimates for the “Will County Service Area” will result in approximately 1,676,966 cubic gate yards of waste being generated for disposal within the expanded “service area” in 1994. See new Plan, at 13. However, the “recycling estimates” apply to Will County alone, and do not appear to apply to the new populations included in the expanded “service area.” There is no basis for the assumption that this new population used to calculate generation amounts has attained the same recycling rates as those claimed by Will County. (Notably, Will County’s claimed 30.62% recycling rate is the third highest reported within the entire State of Illinois, and is well above those claimed for Cook, DuPage, Grundy, and other counties bordering Will County. See IEPA’s Eighth Annual Report, Available Disposal Capacity for Solid Waste in Illinois, at 27-29, Table 12).**

The County believes that the Plan Update appropriately applies the stated recycling rates to the total population of the expanded service area. Tables 7 and 8 of the Plan Update calculate waste disposed over the planning period based on a range of recycling rates from no recycling to a high recycling rate. The range is provided to analyze how available capacity will change with variations in recycling rates. The border population is mostly in the counties of Kane, DuPage and Cook which have reported recycling rates of 29.80%, 25.00% and a range of 11.00% to 26.32%, respectively. These rates comparable to Will County’s recycling rate of 30.62% and are above the state average of 19%.

- 6. The new Plan has justified retaining the 5.82 pcd Will County waste generation rate included in the 1991 Plan, on the basis that the IEPA’s Eighth Annual Report, Available Disposal Capacity for Solid Waste in Illinois, indicated a municipal solid waste generation rate of 5.7 pcd, allegedly based upon a 1995 survey of recycling coordinators. However, no further information about, or justification of, the number identified to Will County in that Report is included, either in this new Plan or in the Report. Absent such information or justification, it is impossible to tell whether the 5.7 pcd rate, the 5.82 pcd rate, or some other generation rate, is appropriate for Will County or the expanded “service area”.**

The basis for the 5.7 pcd given in the IEPA document is not clear. In updating the 1991 Plan, the County decided to begin with the source document. The 1991 Plan has a total solid waste generation rate of 5.82 pcd and a municipal solid waste generation rate around 4.72 pcd (see Table 1 of Plan Update). These waste generation rates are the best estimates available without doing an extensive survey of all municipalities, employers, haulers, recyclers, solid waste facilities, etc. These rates are reasonably comparable to rates calculated for other areas of the state.

7. **At page 13 of the new Plan, mention is made of the 1991 Plan's assumption that 10% of Will County's waste is being exported to other counties for disposal; thereafter, without explanation the new Plan indicates that for purposes of the new Plan, "the exportation of waste is assumed to continue at this rate." It appears that the importation-versus-exportation of waste to and from Will county is a cornerstone of this new Plan (as it was of the 1991 Plan), and as such it would appear essential that the basis for this assumption be explained. In fact, based upon common experience, it is our expectation that this assumption is dramatically incorrect, due to the increased activity at the DuPage County landfills known as Greene Valley and Mallard Lake, which have been accepting for disposal amounts of waste significantly greater than that estimated in the 1991 Plan. It is our belief that Will County does and will export to other counties much more than 10% of its generated waste.**

The County believes that the assumption of 10% export of Will County waste continues to be a reasonable assumption. While it may be true that the two DuPage County landfills may have accepted more waste over the past few years than anticipated by the 1991 Plan, one of these landfills is scheduled to close in 1996, and the other in 1998. These closures leave few out-of-county disposal alternatives for haulers in Will County within a reasonable haul distance.

8. **The 1991 Plan purported to prohibit any new facilities within Will County from establishing a service area that would extend beyond Will County's borders. The new Plan seems to recognize that this meddling in interstate commerce is unconstitutional. However, at the same time the new Plan also suggests that Will County does not approve of any new Will County facilities, whether or not the new facility establishes a service area limited to Will County (except, of course, the private, for-profit landfill with whom the County intends to contract). Please explain the meaning of the paragraph beginning at the bottom of page 13 of the new Plan, and the section entitled "Landfilling" at pages 27 and 28 of the new Plan. In particular, please explain the County's position with respect to new facilities which may become sited with Will County.**

See the response to comment no. 3 by Thomas Augustine, CAPE Chairman on page 14.

9. **The figures in the Table on page 16, entitled “Will County Capacity Projection Net of Recycling,” apparently must be recalculated. The “Waste Generated” column consists of the generation figures included in Table 5 of the new Plan, but the Table 5 figures for commercial/institutional and industrial wastes already calculated the effect of recycling (i.e., these were already “net after recycling”). No accommodation was made in the page 16 Table for this fact, and so the recycling calculations in effect established double credit for these recycling figures.**

The County does not believe that the Will County capacity projections (page 16 of the Plan Update) require revision due to “double credit” for commercial/industrial waste recycling. While it is true that the 1991 Plan utilized commercial/industrial waste generation rates which are “net of recycling”, the data upon which these generation rates were developed came from the Interim Plan in 1988. The County believes that the recycling rates should be applied to these “net” generation numbers for commercial/industrial waste to account for the significant advances in commercial/industrial waste reduction and recycling which has occurred since 1988, and will likely continue. Therefore, the calculations in the Plan Update do not give “double credit” for commercial/industrial recycling, but rather establish the amount of additional waste reduction and diversion which has occurred over the past eight years from these sources.

10. **Note number 6 to the Table on page 16 states: “The annual waste disposed will vary from year to year depending upon population growth and the recycling rate actually achieved. For planning purposes, an average annual disposal requirement of 700,000 tons is realistic.” The meaning of this Note is unclear. The concept of “an average annual disposal requirement” is not set forth at any other point in the new Plan, nor is any basis given for the assumption made in the Note.**

In Table 8 of the Plan Update, the average annual waste disposed ranges from about 573,000 tons to 821,000 tons, depending upon the level of recycling. The average is approximately 697,000 tons per year; therefore, an average annual disposal requirement of 700,000 tons is realistic.

11. **Section IX of the new Plan includes a subsection concerned with “Volume Reduction,” which states that the 5% reduction in waste generation volume originally estimated in the 1991 Plan will be retained. An explanation must be provided for retaining this estimate, particularly in light of the fact that of the “updated programs necessary to meet this goal” (emphasis added) discussed in the new Plan, over one-half of all programs have not been implemented and/or are being discontinued or not actively pursued.**

Presumably if fewer than half of the necessary programs are successful, a commensurate reduction in the volume reduction expectations should be assumed.

The 5% volume reduction was in the original 1991 Plan, and is continued in this Plan Update.

- 12. The 1991 Plan called for three household hazardous waste pickup events to occur each year, and provided that Will County itself would coordinate and fund those efforts. The new Plan acknowledges that the goal has not been met, but states that from henceforth one household hazardous waste drive per year will be pursued, which will be organized by and be at the expense of the private, for-profit owner/operator of the landfill proposed by the new Plan.**

One HHW drop-off day has already been held in 1994. See response to comment by Thomas Augustine, CAPE Chairman, on page 1.

An explanation should be given for the County's failure to meet the 1991 Plan's household hazardous waste expectations, and an explanation should be given for revising the household hazardous waste considerations to one per year.

Same response as above.

Will one such drive per year be adequate to meet the goals of the household hazardous waste reduction policy? How will the County enforce and coordinate the private operator's running of the household hazardous waste drive?

HHW collection events are coordinated and supervised by the IEPA.

Marta M. Tailoumes, City of Naperville (January 18, 1996)

The County should not rely on its efforts to site a landfill as the center piece of its Solid Waste Plan. As landfills throughout the region close, the County must embrace the mission to educate the public with regard to recycling and waste reduction. Although many intentions in the original plan have not been fulfilled, it is irresponsible to toss them aside. If staff limitations must continue, grants for targeted temporary personnel should be sought.

Point noted.

More education program for schools, businesses and apartment complexes are needed. It is important that all the people in Naperville, whether living, working or visiting, are provided the opportunity to recycle.

Point noted.

The County is to be commended for their efforts to provide local disposal options, such as the effort to site a landfill, however they should not assume any landfill will accept only in-County waste. Legislation regarding flow control has been unpredictable at the least.

See response to comment by the Ad Hoc Committee, Will County Governmental League on page 15.

The County should note that it has assisted Naperville and other municipalities by allowing us to find our own methods of recycling and waste disposal. We trust that the County will continue to give us the freedom to do the best for our residents. Any information regarding various waste technologies, their rates, locations and capacity are welcome.

The County plans to continue the recycling assistance and educational programs.

The Plan Update addresses Household Hazardous Waste but falls short if the landfill is not sited or if the IEPA fails to provide a grant. Many communities have exposed themselves to superfund liability by allowing residents to discard HHW in the municipal waste stream. Since paint is the most significant waste in this category, the County should consider funding some type of regular paint collection program. Some counties encourage paint stores to recycle latex paint from residents. Such a program is very low cost and convenient to citizens.

See Section X - Household Hazardous Waste of the Plan Update.

Charles F. Helsten for Hinshaw & Culbertson (March 12, 1996)

Suggested Final Revisions to Proposed Solid Waste Management Plan Update.

These revisions have been incorporated into the Plan Update and Executive Summary.



State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director
(217) 785-8604
FAX (217) 524-1991

2200 Churchill Road, Springfield, IL 62794-9276

September 27, 1995

Mr. Narayan Kedare, P. E.
Solid Waste Director
Will County Land Use Department
501 Ella Avenue
Joliet, IL 60433

Re: SWM Grant/Planning/Will County/Correspondence

Dear Narayan:

Thank you for the opportunity to comment on the guidelines for the development of Will County's five year plan update.

I have the following comments:

1. Because the Solid Waste Planning and Recycling Act (SWPRA) requires the development of a plan for the management of municipal waste, the guidelines should reference only municipal waste, not solid and special waste.
2. Use SWPRA instead of P.A. 85-1198; most people probably don't know what PA 85-1198 is.

As you know, the SWPRA gives very little guidance on plan updates. It states: "Each county waste management plan shall be updated and reviewed every five years, and any necessary or appropriate revisions shall be submitted to the Agency for review and comment."

Because the SWPRA does not designate the required content of plan updates, or the process a county should follow in completing these revisions, counties may prepare their updates in whatever format best suits their resources. Updates may be as brief or extensive as a county chooses. In an effort to provide assistance in the development of plan updates, we are finalizing a brief form local governments may use to complete their updates. Our form is designed to be straightforward and relatively simple to complete. We do not anticipate that it will require the services of a consultant. Although you may prepare a more extensive document for your plan update, we will consider submission of our completed form to be

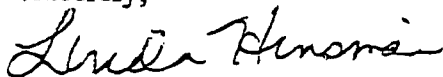
your plan update. We expect to mail our forms to our current grantees during the first week of October.

After we receive a plan update, it will be reviewed and comments will be transmitted to a local government within 90 days. After the Agency's comments are transmitted, whatever revisions a county believes are appropriate should be made to the plan. It is suggested that the updated plan then be readopted, with the appropriate revisions included, by ordinance or resolution. To simplify this process, an ordinance or resolution may be passed that incorporates the completed update form into the plan, thus eliminating the need to actually reprint the plan with the revisions. The update may also be included as an appendix in the revised plan. If Will County determines that public hearings should be held on the plan updates, the Agency's public hearing information should be followed. If the updated plan is reprinted to include the revisions, five copies should be submitted to us for our files.

As you know, the Agency is not authorized to approve plans or plan updates under the SWPRA. We will however, provide written confirmation that your plan update has been completed and reviewed by the Agency.

If you have further questions about the required content of the plan update, you may wish to consult your State's Attorney.

Sincerely,



Linda Hinsman, Manager
Planning and Grants Unit
Solid Waste Management Section
Bureau of Land



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director
(217) 785-8604

2200 Churchill Road, Springfield, IL 62794-9276

December 14, 1995

Mr. Narayan Kedare, P.E.
Waste Services Director
Will County Land Use Department
501 Ella Avenue
Joliet, IL 60433

Re: SWM Grant/Planning/Will County/Correspondence

Dear Narayan:

This letter responds to your November 17, 1995 correspondence on Will County's solid waste management plan update.

As you know, the Solid Waste Planning and Recycling Act (SWPRA) requires each county to update and review adopted plans every five years, and submit necessary or appropriate revisions to the Agency for review and comment. The SWPRA does not designate the required content of plan updates, or the process a local government should follow in completing their revisions. The law does not specify the public notification or public involvement process a local government should follow when completing their plan update.

I have reviewed the draft plan update, which includes a completed plan update form we recently transmitted to local governments with plan updates due in 1996 and 1997. We consider submittal of our completed plan update form to be the plan update required by the law.

Will County's draft five-year plan update has been completed in accordance with the provisions required in the SWPRA; submit five copies of the final plan update to me when they are available.

Please contact me if you need anything further.

Sincerely,

Linda Hinsman, Manager
Planning and Grants Unit
Solid Waste Management Section
Bureau of Land