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# Response to Criterion 1 Need Report

**Henson Recycling Campus Transfer  
Station**

November 27, 2023

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## TABLE OF CONTENTS

<b>Acronym List</b> .....	<b>iii</b>
<b>1.0 Introduction</b> .....	<b>1</b>
1.1 Background .....	2
1.2 Methodology for Determining Need for a Solid Waste Facility.....	3
<b>2.0 Projections of Waste Generation in the Service Area</b> .....	<b>4</b>
2.1 Comparison of Methodologies for Calculating Waste Generation in the Service Area .....	4
2.2 Summary of Waste Generation Projections in the Service Area .....	5
2.3 Findings.....	6
<b>3.0 Description of Permitted Solid Waste Facilities Servicing the Service Area</b> .....	<b>7</b>
3.1 Solid Waste Disposal Facilities Located Within or Near the Service Area .....	7
3.1.1 Findings .....	8
3.2 Transfer Stations Located In/Near the Service Area .....	8
3.2.1 Transfer Stations Outside McLean County.....	8
3.2.2 Transfer Stations In McLean County .....	8
3.2.3 Findings .....	9
<b>4.0 Waste Collection, Recycling Opportunities and Host County Fees</b> .....	<b>11</b>
4.1 Waste Collection and Recycling Opportunities .....	11
4.2 Host Fees.....	12
4.2.1 Host Community Fee .....	12
4.2.2 City of Bloomington Utility Agreement .....	13
4.2.3 Findings .....	13
<b>5.0 Conclusion</b> .....	<b>14</b>
<b>6.0 Limitation</b> .....	<b>15</b>
<b>7.0 References</b> .....	<b>16</b>
<b>Table in Report</b>	
Table 2           Comparison of Waste Generation Methodologies .....	6

## APPENDICES

### Appendix A Figures

Figure 1 Location of Solid Waste Facilities In/Near the Service Area

### Appendix B Tables

Table 1 McLean County Waste Generation and Disposal Projections

Table 3 Landfills Near the Service Area

Table 4 Transfer Stations In/Near the Service Area

Table 5 Incoming and Outgoing Tons at the ADS Bloomington Transfer Station

## Acronym List

<b>2017 MCLEAN COUNTY PLAN</b>	Twenty-Year Materials Recovery and Resource Management Plan for McLean County, Bloomington, and Normal, Illinois
<b>2022 ANNUAL REPORT</b>	2022 EAC Annual Solid Waste Report
<b>2022 LANDFILL REPORT</b>	IEPA 2022 Illinois Landfill Disposal Capacity Report
<b>ACT</b>	Illinois Environmental Protection Act
<b>ADS</b>	American Disposal Services
<b>ADS TS</b>	ADS Bloomington Transfer Station
<b>APPLICANT</b>	Lakeshore Recycling Systems, LLC
<b>BH&amp;S</b>	Brown Hay and Stephens
<b>C&amp;D</b>	Construction or Demolition Debris
<b>CRITERION 1 REPORT</b>	Criterion 1 Report in the Siting Application
<b>DCEO</b>	Department of Commerce and Economic Opportunity
<b>DLF</b>	Demolition landfill
<b>DPY</b>	Days per year
<b>EAC</b>	Ecology Action Center
<b>HRC</b>	Hanson Recycling Campus
<b>HRC TS</b>	Hanson Recycling Campus Transfer Station
<b>LF</b>	Landfill
<b>MPH</b>	Miles per hour
<b>MRF</b>	Materials recovery facility
<b>MW or MSW</b>	Municipal solid waste or Municipal waste
<b>OTR</b>	Over the road
<b>PCD</b>	Pounds per capita per day
<b>RDF</b>	Recycling & Disposal Facility
<b>REPUBLIC</b>	Republic Services
<b>SERVICE AREA</b>	McLean County Service Area
<b>SITING APPLICATION</b>	Application for Local Siting Approval, for the Henson Recycling Campus (HRC) Transfer Station (TS), filed August 18, 2023
<b>SSR</b>	Single Stream Recyclables
<b>TPD</b>	Tons per day

TPY	Tons per year
TS	Transfer Station

## 1.0 Introduction

The purpose of this report is to evaluate whether the proposed Criterion 1 Report in the Application for Local Siting Approval (Siting Application) for a Transfer Station to be located at what is referred to as the Henson Recycling Campus (HRC). Filed on August 18, 2023 the Siting Application requires a demonstration pursuant to Section 39.2 of the Illinois Environmental Protection Act (Act) that the proposed facility, by a manifest weight of evidence, that “the facility is necessary to accommodate the waste needs of the area it is intended to serve”.

Brown Hay and Stephens (BH&S) retained TRC Environmental Corporation (TRC) to review the Laskeshore Recycling Systems, LLC Siting Application.<sup>1</sup> TRC reviewed the following information to offer an opinion as to whether Criterion 1, Need was met:

- Application for Site Location for the (HRC TS) filed with the McLean County Clerk on August 18, 2023 (Siting Application).
- Signed Host Community Agreement between Henson Disposal, LLC and McLean County, dated November 10, 2022.
- Signed Water and Sewer Agreement between City of Bloomington, Illinois and TKnTK, LLC, dated January 27, 2023
- List of Illinois Transfer Stations, from a web search
  - <https://locator.wastebits.com/nearby/transfer-facility/IL>
- CDM Smith. Illinois Commodity / Waste Generation and Characterization Study Update, March 30, 2015. List of Illinois Transfer Stations, from a web search
- Information provided by the Illinois Environmental Protection Agency (IEPA):
  - List of permitted landfills and transfer stations, 2014
- Information from the IEPA website:
  - IEPA Agency Facility Inventory and Information Search System (AFIIS) Database search using the search word Transfer  
[.http://epadata.epa.state.il.us/TieFileData/MasterSearchEJ.asp](http://epadata.epa.state.il.us/TieFileData/MasterSearchEJ.asp)
  - Illinois Landfill Disposal Capacity Report – 2022
- McLean County Solid Waste Planning Documents
  - 2017 Twenty-Year Materials Recovery and Resource Management Plan for McLean County, Bloomington, and Normal, Illinois.
  - McLean County Waste Generation and Recycling Rates Continue to Grow – Press Release, July 2023

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<sup>1</sup> TRC is a global firm providing environmentally focused and digitally powered solutions that address local needs. For more than 50 years, TRC has provided full-service engineering and environmental management services to the leading commercial and industrial solid waste companies in the United States. Our staff have a wide range of experience on solid waste projects and have assisted clients in all phases of solid waste management. Ms. Smith has written and testified on dozens of Criterion 1 reports for pollution control facilities in Illinois during her career.

- Ecology Action Center McLean County Solid Waste Program, 2022 Annual Report.
- 2022 Champaign County Solid Waste Management Plan
- IEPA. July 1, 2021. Illinois Materials Management Advisory Committee Report to the General Assembly
- ADS Bloomington Transfer Station (ADS TS) Waste Tonnage Report for 2022 and 2023 through 11/19/2023.

## 1.1 Background

According to the Siting Application, the transfer station will be located on an approximately 3.09 acre parcel which is within a 42-acre recycling campus. The proposed HRC TS is located east of Interstate I-55, southwest of the Norfolk Southern Railroad, north of Rhodes Street, and east of Bunn Street, near the south-central part of the City of Bloomington.<sup>2</sup> The proposed facility has a design capacity of 400 tons per day (tpd). According to the Siting Application, the facility will accept Municipal Waste and single-stream recyclables (SSR).<sup>3,4</sup> The HRC currently has several recycling operations including an existing construction or demolition debris (C&D) operation, a wood waste mulching operation, concrete recycling operation and a concrete batch plant that is operated by Roanoke Concrete Products.<sup>5</sup> No hazardous wastes or special wastes will be accepted. The facility intends to receive residential and commercial waste generated in McLean County.

The Siting Application states that the purpose of the transfer station is to:

- Increase competition and available transfer disposal capacity.
- Expand the existing recycling services offered by HRC.
- Direct financial benefits to McLean County in the amount of \$1/ton because of the host fee payments.
- Direct host fee payments to the City of Bloomington in the amount of \$1/ton for MSW transferred to a landfill.
- Direct fees to the City of Bloomington for construction of utilities to service the HRC TS.
- Improve operational efficiencies on site by diverting construction loads with high levels of non-recyclables away from the construction recycling area to the transfer station.

The Siting Application states the development of the transfer station would divert loads that might have high cross-contamination potential to the transfer station directly.<sup>6</sup> Once directed there, the material would be reloaded into transfer trailers and transported to the landfill, potentially removing some of the concrete that could have been recycled at the concrete recycling area, as part of the current HRC. No calculations were provided justifying the claim

<sup>2</sup> Siting Application, pg. Page 16 (1-2) of the pdf.

<sup>3</sup> Municipal waste as defined by the Illinois Environmental Protection Act, Section 3.290, ("Act"), or by the Solid Waste Planning & Recycling Act, as amended by P.A. 87-650 includes: garbage, general household and commercial waste, industrial lunchroom or office waste, and construction or demolition debris (C&D). Municipal waste shall also be referred to as MSW in this report.

<sup>4</sup> Siting Application, pg. 1-2.

<sup>5</sup> Siting Application, Figure 1-2, pg. 48 of the pdf.

<sup>6</sup> Siting Application, pg. 1-28.

that having the transfer station would make the HRC operation more efficient.<sup>7</sup> There was no demonstration in the Siting Application that if siting approval was granted that the HRC TS is a more cost effective option.

The Siting Application did not correctly evaluate the existing processing capacity of the operating ADS TS, relying instead on one day of visual observations and truck and transfer trailer counts. TRC reviewed daily tonnage reports from the ADS TS for incoming tons of MSW received and tons of MSW transferred to landfills for the years 2022 and 2023.<sup>8</sup> This data showed that in 2022, the transfer station processed more than 300 tpd of MSW 78% of the working days, excluding Saturdays. In 2023, the ADS TS received more than 300 tpd, 87% of the working days, excluding Saturdays. Additionally, the Siting Application did not consider how much waste would be generated in the McLean County service area (Service Area) over the proposed 20-year operating life of the HRC TS and ignored the impact of potential transfer station capacity at the Municipal Bulk Transfer Station in Bloomington and the current McLean County-generated waste that is likely direct hauled to GFL landfills in De Witt, and Tazewell Counties when calculating a capacity shortfall for transfer station processing capacity. (Refer to Figure 1, Attachment A for their locations).

## 1.2 Methodology for Determining Need for a Solid Waste Facility

The well-established general methodology used for determining Need for a solid waste facility is to:

- Identify the geographic area or service area to be served by the facility.
- Estimate the population of the service area over the proposed operating life of the facility.
- Determine the waste generation rates and recycling goals from the county solid waste plans in the service area.
- Apply the recycling goals to the total waste generated to determine the net amount of waste requiring disposal.
- Determine the available disposal capacity and transfer station processing capacity available to the service area to receive waste from the service area.
- Determine whether other solid waste facilities could receive this waste.
- Determine if a capacity shortfall for the service area exists.
- Identify other factors that may define the need for the solid waste facility.

The next sections will discuss whether the methodology outlined above was executed by the Applicant in the Criterion 1 Report and present the findings from the evaluation.

<sup>7</sup> Siting Application. Pg. 1-28.

<sup>8</sup> Data for 2023 was available through November 19, 2023.



## 2.0 Projections of Waste Generation in the Service Area

The Criterion 1 Report in the Siting Application (Criterion 1 Report) used two different sources of data for determining the net amount of waste requiring disposal from McLean County, after recycling goals are applied, focused on 2022 data. This evaluation looks at the potential changes in recycling goals and waste generation rates over the proposed 20-year operating life of the HRC TS.

### 2.1 Comparison of Methodologies for Calculating Waste Generation in the Service Area

The Criterion 1 Report used two different sources of data for determining the net amount of waste requiring disposal from McLean County, after recycling goals are applied. The first source was the Illinois Commodity/Waste Generation and Characterization Study Update dated March 30, 2015 (Illinois DCEO Update). The Illinois DCEO Update reported that in 2014, McLean County generated 7.84 pounds per capital per day (pcd) or 276,647 tons per year (tpy), based on a population of 173, 831.<sup>9</sup> The Illinois DCEO Update also estimated that in 2014, a 37.3% statewide recycling rate was achieved. The Criterion 1 Report applied the 2015 Illinois DCEO Update recycling rate to the 2022 pcd waste generation estimates instead of the reported McLean County 2022 recycling rate of 46.5%.<sup>10</sup> By applying the 2022 McLean County recycling rate, the resulting net waste requiring disposal in 2022 based on the Illinois DCEO methodology, would have been estimated at 148,006 tons or 517 tpd not 607 tpd.<sup>11</sup> By not using the McLean County 2022 recycling rate, the Criterion 1 Report overestimated the net waste requiring disposal for the Service Area in 2022 by 91 tpd.

The Criterion 1 Report also used a second source of data to estimate waste generation and net waste requiring disposal. That data was the Ecology Action Center (EAC) MSW generation and recycling data from 2022 compiled in an EAC press release dated July 6, 2023.<sup>12</sup> The Criterion 1 Report neglected to consider potential changes in waste generation or recycling rates over the proposed 20 year operating life of the HRC TS. These projections for waste generation and recycling rates are outlined in the EAC 2017 *Twenty-Year Materials Recovery and Resource Management Plan for McLean County, Bloomington, and Normal, Illinois*. (2017 McLean County Plan).<sup>13</sup>

Presented in Table 1 (Attachment B) are the projections for the net McLean County-generated MSW requiring disposal from the Service Area from 2016 – 2043. The data for 2016 used in

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<sup>9</sup> CDM Smith. March 30, 2015. Illinois Commodity / Waste Generation and Characterization Study Update. Appendix C, pg. 276 of the report.

<sup>10</sup> [McLean County Waste Generation and Recycling Rates Continue to Grow – Ecology Action Center](#) Site visited November 19, 2023.

<sup>11</sup> This conversion is based on the solid waste landfills or transfer stations operating 286 days per year (dpy).

<sup>12</sup> [McLean County Waste Generation and Recycling Rates Continue to Grow – Ecology Action Center](#). July 6, 2023. Site visited November 19, 2023.

<sup>13</sup> [Ecology Action Center. December 27, 2017. Twenty-Year Materials Recovery and Resource Management Plan for McLean County, Bloomington, and Normal, Illinois](#). (2017 McLean County Plan) Site visited November 19, 2023.

Table 1 is from the *McLean County Solid Waste Program 2022 Annual* (2022 Annual Report).<sup>14</sup> Data for the years 2017 – 2022 used in Table 1 is based on the reported values from EAC’s press release on waste generation and recycling rates.<sup>15</sup> For the years 2023 – 2043, the waste generation was estimated to decrease 0.34% per year, from the 2022 values, based on the waste generation trend observed over the time period 1998 – 2016.<sup>16</sup> Additionally, Table 1 applies the recycling rate goals identified in the 2017 McLean County Plan:

- 2022 Recycling Rate Goal: 50%
- 2027 Recycling Rate Goal: 60%
- 2032 Recycling Rate Goal: 70%
- 2037 Recycling Rate Goal: 80%

As presented in Table 1, the net waste for disposal projections range from 104,241 tpy (365 tpd)<sup>17</sup> in 2023 to 39,217 tons per year in 2043 (137 tpd), assuming the aggressive recycling goals outlined in the 2017 McLean County Plan are achieved. The waste generation numbers are relatively flat per the projections in the 2017 McLean County Plan and the recycling rate goals have the biggest impact on the net waste disposal requirements for the Service Area.

TRC also reviewed a recent IEPA publication related to assessing and calculating per capita waste generation and diversion goals for counties and communities in the State of Illinois. On July 12, 2019, Governor Pritzker signed Illinois Public Act 101-0074 which established a Materials Management Advisory Committee whose purpose was to evaluate the existing state of waste, recycling and organics management in Illinois, and to evaluate the existing waste management infrastructure and end markets for the materials diverted from landfills. The Committee also made recommendations on a new format for the County solid waste plan updates. In particular the Committee recommended: “*The Waste Generation section should identify the County’s current waste generation rate and current diversion rate, using **locally compiled data** where available. If **locally-derived** rates are not available, the County should use statewide figures contained in Section 2 of this report (Annualized Waste Disposal, Diversion, and Generation Figures), or as updated by the Illinois EPA in the future.*”<sup>18</sup> The Committee has proposed a statewide landfill diversion goals of 40% by 2025, 45% by 2020 and 50% by 2035.<sup>19</sup>

## 2.2 Summary of Waste Generation Projections in the Service Area

Presented in Table 2 are the comparisons of the waste generation and net waste for disposal projections requirements for the Service Area. The Criterion 1 Report estimated the Service

<sup>14</sup> <https://ecologyactioncenter.org/wp-content/uploads/2023/11/2022-Annual-Solid-Waste-Report.pdf>.

<sup>15</sup> [McLean County Waste Generation and Recycling Rates Continue to Grow – Ecology Action Center](#). July 6, 2023. Site visited November 19, 2023.

<sup>16</sup> [Ecology Action Center. December 27, 2017. Twenty-Year Materials Recovery and Resource Management Plan for McLean County, Bloomington, and Normal, Illinois.](#) (2017 McLean County Plan) Pg. 19 in the report.

<sup>17</sup> Based on 286 operating dpy.

<sup>18</sup> IEPA. July 1, 2021. Illinois Materials Management Advisory Committee Report to the General Assembly. pg. 118 of the pdf.

<sup>19</sup> Ibid. pgs 7-8 of the pdf..

Area net waste disposal requirements as 500 tpd by averaging the Illinois DCEO Update data and a 37.3% recycling goal (607 tpd) with the EAC projections including actual waste generation and diversion data for the year 2022 (393 tpd). The results from Table 1 based on the 2017 McLean Plan are shown for comparison in Table 2 below. If the recycling goals outlined in the 2017 McLean Plan are reached, the net waste requiring disposal from the Service Area could drop to 137 tpd by 2042.

**Table 2 Comparison of Waste Generation Methodologies**

Source of Data	Total Waste Generation	Recycling Rate Goals 2022	Estimated Net Waste for Disposal (Tons per Year)	Estimated Net Waste for Disposal (Tons per Day)
Illinois DCEO Update	276,647	37.3% (2015 Data)	173,457	607
Illinois DCEO Update	276,647	46.85% (2022 McLean County Data)	147,038	514
EAC	209,907	46.85% (2022 McLean County Data)	112,264	393
2017 McLean County Plan 2023	209,193	50% (2017 McLean County Plan)	104,241	365
2017 McLean County Plan 2042	196,085	80% (2017 McLean County Plan)	39,217	137

### 2.3 Findings

The Criterion 1 Report **significantly overestimated** the amount of waste requiring disposal from the Service Area by not accounting for the changes in waste generation and recycling goals as projected in the 2017 McLean Plan, over the intended 20 year operating life of the HRC TS. (Table 1, Appendix B)

### 3.0 Description of Permitted Solid Waste Facilities Servicing the Service Area

Figure 1 (Appendix A) identifies the locations of the permitted landfills and transfer stations within the Service Area and nearby counties. These facilities were identified based on data searches on IEPA's Agency Facility Inventory and Information Search System (AFIIS) database, the IEPA 2022 Illinois Landfill Disposal Capacity Report (2022 Landfill Report) and other internet articles related to the status of the Peoria City/County Landfill 3 capacity and operating life. The Criterion 1 Report did not include the processing capacity of the Bloomington Bulk Transfer Station or the Peoria City/County Landfill 3 in the analysis. Peoria City/County Landfill 3 is projected to add an additional 36 years of life expectancy. Table 3 presents information on the licensed landfills operating in or near the Service Area. Table 4 identifies the transfer stations operating in or near the Service Area. (Refer to Appendix B)

#### 3.1 Solid Waste Disposal Facilities Located Within or Near the Service Area

Presented in Table 3 are the permitted MSW landfills in or near the Service Area with significant disposal capacity to meet the disposal needs of the Service Area. (Figure 1, Appendix A.) These landfills are Clinton Landfill 3, the Livingston Landfill, and the Indian Creek Landfill #2, with an estimated 37 years, 21 years and 27 years of life expectancy, respectively, based on each landfill's 2022 waste receipts. The Applicant's Criterion 1 Report, however, did not use the 2022 Landfill Report data in their analysis, so their data was based on 2021 landfill receipts.

The Peoria City County Landfill #2 currently operated by Waste Management has one year of life expectancy estimated to be through 2024. GFL was awarded the new contract to operate the Peoria City County Landfill #2 estimated to begin operation in 2025.<sup>20</sup> The Applicant's Criterion 1 Report did not identify the Peoria County Landfill #3 landfill, its 36 years of disposal capacity or that GFL will be the new operator when Peoria City County Landfill #2 reaches capacity.

Presented in Table 3 are the one way travel distances from the proposed HRC TS location to each of the landfills discussed above. Clinton Landfill 3 is approximately 26 miles one way from the proposed HRC TS location and is available to receive waste from the Service Area.<sup>21,22</sup> Indian Creek Landfill #2 and Livingston Landfill are located approximately 40 to 44 miles one way, respectively, from the proposed HRC TS location and are available to receive waste from the Service Area.<sup>23</sup> McLean County generated MSW is delivered to the Livingston Landfill from

<sup>20</sup> [Peoria City/County Landfill - County Landfill Landing Page. https://www.peoriacounty.gov/203/City-County-Landfill. Viewed 11 19 2023.](https://www.peoriacounty.gov/203/City-County-Landfill)

<sup>21</sup> Bing Mileage calculator.

[https://www.bing.com/search?q=directions+driving&cvid=e2f7cda3bd1345b284b696a41d5565bd&gs\\_lcrp=EgZjaHJvbWUqBggBEAAYQDIGCAAQRRg5MgYIARAAGEAyBggCEAAYQDIGCAMQABhAMgYIBBAAGEAyBggFEAAYQDIGCAYQRRg8MgYIBxBFGDwyBggIEEUYPDIHCAkQRRj8VdIBCDAQ2MzZqMGo0qAIAAsAIA&FORM=ANAB01&PC=U531](https://www.bing.com/search?q=directions+driving&cvid=e2f7cda3bd1345b284b696a41d5565bd&gs_lcrp=EgZjaHJvbWUqBggBEAAYQDIGCAAQRRg5MgYIARAAGEAyBggCEAAYQDIGCAMQABhAMgYIBBAAGEAyBggFEAAYQDIGCAYQRRg8MgYIBxBFGDwyBggIEEUYPDIHCAkQRRj8VdIBCDAQ2MzZqMGo0qAIAAsAIA&FORM=ANAB01&PC=U531)

<sup>22</sup> Clinton Landfill identified a regional service area as part of its Siting Application which included McLean County. Criterion 1 Report, Clinton Landfill Inc. Siting Application filed April 11, 2002.

<sup>23</sup> Indian Creek #2 and Livingston Landfill are both regional landfills and have no restrictions on receipt of MSW from the Service Area.

the ADS TS. Republic also direct hauls McLean County-generated non-hazardous special waste to the Livingston Landfill.<sup>24</sup> The Criterion 1 Report noted that GFL is collecting MSW from rural communities south of Bloomington and likely direct hauling it to Clinton Landfill 3 or Indian Creek Landfill #2. That decision is likely based on the route locations and the economics for hauling and disposal. The Criterion 1 Report did not reduce the capacity shortfall for the Service area to account for waste GFL collects in McLean County that is disposed out of the county.

### **3.1.1 Findings**

The HRC TS **is not needed** because haulers servicing McLean County currently have access to sufficient, long term disposal capacity in landfills near to the Service Area, either by transfer through the ADS TS or by direct haul. As presented in Table 3, these landfills have 21 to 37 years of life expectancy, based on 2022 in-place Disposal Volumes reported by each landfill to IEPA. Additionally, the Criterion 1 Report did not account for the waste that GFL is currently collecting in McLean County and likely direct hauling to the GFL landfills in De Witt and Tazewell Counties.

## **3.2 Transfer Stations Located In/Near the Service Area**

The Applicant identified five transfer stations in the Siting Application that may be available to receive waste from the service area, including the Central Waste Transfer & Recycling in Champaign County, ADS TS in McLean County, Tazewell Transfer Station in Tazewell County, the Chillicothe Recycling & Transfer/Wigand Facility in Peoria County and the Municipal Bulk Waste Transfer Station in McLean County, which the Criterion 1 Report did not evaluate or include.<sup>25</sup>

### **3.2.1 Transfer Stations Outside McLean County**

As presented in Table 4, the Central Waste, Tazewell and Wigand Transfer Stations are located 45 – 53 miles away, respectively, from the proposed HRC TS location, however they may be able to receive waste by direct haul from the western or eastern regions of the Service Area. Presently, the Central Waste Transfer & Recycling Facility does not receive waste from Mclean County.<sup>26</sup> Waste Management is a vendor offering collection services in the Service Area which could be directed to the Tazewell Transfer Station. Other landfill and transfer station options exist such as Indian Creek Landfill #2 or the Tazewell Transfer Station that would be closer than the Wigand Transfer Station, for receipt of McLean County waste by direct haul.

### **3.2.2 Transfer Stations In McLean County**

The Municipal Bulk Waste Transfer Station only processes materials that are collected by the City of Bloomington through its own collection vehicles. That facility is currently handling bulky waste from the Service Area. The ADS TS is conveniently located approximately five miles

<sup>24</sup> Personal communication with D. Winters, Republic Services Area Manager, November 2023.

<sup>25</sup> This facility accepts furniture, basement, interior and exterior remodeling debris and items of waste generated by cleaning out a house, excluding food waste.

<https://www.bloomingtonil.gov/departments/public-works/resident-community/solid-waste/bulk>.

<sup>26</sup> Personal communication with D. Winters, Republic Services Area Manager, November 2023.

from the HRC and is currently receiving MSW from HRC.

The Criterion 1 Report stated that a one day observation and traffic count was accomplished by counting collection vehicles and transfer trailers exiting the ADS TS. Based on their analysis, the ADS TS was only capable of processing 300 tpd of MSW. That analysis is flawed because the observation only evaluated one day of operations which does not account for seasonal or day of the week variations in waste generation. The observation and traffic count did report that Henson Disposal delivered 5 rearloader loads to the ADS TS on that day which is potentially double the 25 tons that the Criterion 1 Report indicated that Hensdon Disposal has typically delivered to ADS TS.<sup>27</sup>

TRC evaluated daily waste receipts in tons at the ADS TS for 2022 and 2023 (through November 19, 2023) for both the inbound collection vehicles and outbound transfer trailer loads.<sup>28</sup> This data is presented in Table 5, Appendix A. Some of the key findings from this data are:

- The ADS TS is not restricted on the daily amount of MSW it can receive and in 2022, the facility exceeded 300 tpd, 66% of the time which increased to 80% of the time, excluding Saturday operations.<sup>29</sup>
- As of November 19, 2023, the ADS TS handled more than 300 tpd, 72% of the time which increased to 87% of the time, excluding Saturday operations.
- In 2022, the average tons of incoming waste was 330 tons and this number increased to 348 tons in 2023.<sup>30</sup>
- In 2022, the highest incoming one day tonnage was 511 tons, which increased to 564 tons in 2023.

### 3.2.3 Findings

There is **sufficient** transfer station processing capacity at the ADS TS to meet the needs of the Service Area and is **no additional transfer station** processing capacity in McLean County is required. Other haulers, such as GFL, are direct hauling waste to their landfills near the Service Area. The Tazewell TS could service customers in the western part of the Service Area. Other customers at the ADS TS including Henson Disposal, the City of Bloomington, the Town of Normal and other local haulers are currently using the ADS TS. The ADS TS has received more than 500 tpd of MSW on several days during 2022 and 2023. The Municipal Bulk Transfer Station is currently handling bulky waste collected by the City of Bloomington. The Applicant conducted a one day observation and traffic study and calculated that 300 tons per day was the maximum processing capacity of the ADS TS. In 2022, the ADS TS received more than 300 tpd 78% of the working days (excluding Saturdays). In 2023, this percent increased to 87%,

<sup>27</sup> Siting Application. Pg.23 of the pdf. Typical rear load collection vehicle carry 10 – 12 tons of payload. Heil compaction rates of 1,000 pounds per cubic yard are possible. <https://routereadytrucks.com/blogs/rear-loader-truck-specifications/> 5 rear load vehicles may have delivered 60 tons on the observation day to the ADS, instead of the 25 tons mentioned in the Criterion 1 Report.

<sup>28</sup> Data was provided by D. Winters, Republic Services Area Manager, November 2023.

<sup>29</sup> The ADS TS operates half a day on Saturdays.

<sup>30</sup> This excludes Saturday working days.



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excluding Saturdays. In 2022, the ADS TS transported more than 300 tpd to the landfill, 78% of the working days (excluding Saturdays). In 2023 this percent increased to 79%, excluding Saturdays.

## 4.0 Waste Collection, Recycling Opportunities and Host County Fees

This section of the evaluation will address the Criterion 1 Report which states that the proposed HRC TS is needed to increase recycling and operational efficiencies, especially for concrete recycling. According to the Criterion 1 Report the facility is also needed because it will provide payment of host fees to McLean County and the City of Bloomington

### 4.1 Waste Collection and Recycling Opportunities

The Criterion 1 Report noted that the HRC TS is needed to increase recycling through the acceptance of single stream recyclables (SSR) and additional C&D recycling, yet the existing HRC has a sorting facility that allows them to separate recyclables from non-recyclable materials including concrete.<sup>31</sup> In addition, the source separated concrete is currently crushed and recycled in to saleable projects. The existing infrastructure and operations that provide these services are part of the **existing HRC facility** and do not require the addition of a MSW transfer station.

The Criterion 2 report<sup>32</sup> states that the facility is to receive MSW from collection vehicles that will be directed to the transfer station, will deposit their loads on the tipping floor and after screening, the waste will be loaded into open-top transfer trailers for disposal at an out-of-county landfill. There will not be any mechanized equipment to process the recyclables, or separate concrete from the loads. Manual sorting will be used, to remove or separate prohibited waste materials.<sup>33</sup>

The lack of intent to recycle C&D material at the HRC TS is further supported by the breakdown of the anticipated maximum daily average waste receipts by material outlined in Table 1 in the Criterion 2 Report.<sup>34</sup> The breakdown is:

- Residential 84% or 336 tpd
- Commercial 12% or 48 tpd
- Single Stream Recyclables 4% or 16 tpd
- Industrial Waste 0%
- C&D 0%
- Landscape Waste 0%

The Criterion 1 Report also stated that The HRC Transfer Station will also provide efficiencies and synergies at the HRC that will increase the capacity and/or efficiency of C&D recycling. With the operation of the HRC Transfer Station, loads of C&D waste that contain a large percentage of non-recyclable material can be diverted to the HRC Transfer Station to prevent potential cross contamination and free up valuable resources at the C&D recycling facility.

<sup>31</sup> Siting Application.pg. 131 of the pdf.

<sup>32</sup> The Proposed Facility is so Designed, Located and Proposed to be Operated that the Public Health, Safety and Welfare are Protected. Siting Application.

<sup>33</sup> Siting Application. pg. 138 of the pdf.

<sup>34</sup> Siting Application. Pg. 139 of the pdf.



Increase the capacity and/or efficiency of C&D recycling.<sup>35</sup>

If the loads of C&D that potentially have cross contamination are no longer sorted at the C&D recycling area at HRC but head directly to the transfer station, and there is no C&D processing anticipated at the transfer station, then the quantity of C&D recycled at the HRC can potentially decrease over time. There is no documentation in the Criterion 1 Report that the development of the HRC TS will increase the capacity or the efficiency for C&D recycling at either the HRC or the HRC TS.

## 4.2 Host Fees

This section discusses the Host Community and the Utility Agreement fees that are tied to the approval of the HRS TS Siting Application. Many Illinois county solid waste plans and plan updates require payment of a host fee to the affected community(ies) and/or host county. Payment of these fees although a benefit to a host community or county, is not a primary consideration for showing the necessity for a pollution control facility.

### 4.2.1 Host Community Fee

The Criterion 1 Report identifies that McLean County will benefit from the payment of \$1/ton for each ton of waste received by the Transfer Facility except that the fee on C&D will be \$.50/ton.<sup>36</sup> The host fee will not apply to landscape waste or recyclables transferred through the HRC TS.<sup>37</sup> Additionally, the host fee can be reduced by \$.50/ton on each ton of waste when the Subject property is annexed into the City of Bloomington.<sup>38</sup> According to the terms of the Host Community Agreement, the host fee may increase for the first three years of the HRC TS operation, up to 3% based on a specific Consumer Price Index noted in the Agreement. The host fee adjustment is then held constant through the 10<sup>th</sup> anniversary year and then capped at 5%. Fifty percent of the fee shall be used by McLean County to support organizations that are involved with recycling or recycling education, including but not limited to the EAC.<sup>39</sup>

McLean County declined another opportunity for a host fee. As presented in the Criterion 1 Report, Republic had offered an alternative bid to the contract specifications for disposal services (Bid #2021-2—Solid Waste Disposal Services) for waste collected by the City of Bloomington and the Town of Normal. The alternative bid was for a 10-year contract with an estimated 3% annual increase in pricing, with the payment of a \$2/ton host fee for each ton of waste that Bloomington and Normal delivered to the ADS TS. This fee would be paid to the Bloomington Normal Solid Waste Fund which would go to the McLean County fund to help pay for the EAC to manage solid waste and recycling education for McLean County. This is twice the host fee offered to McLean County in the Host Community Agreement yet the alternate bid was not accepted at the Town of Normal meeting on February 15, 2021.<sup>40</sup>

<sup>35</sup> Siting Application. Pg. 42 of the pdf.

<sup>36</sup> Siting Application. Host Community Agreement between Henson Disposal, LLC and McHenry County, effective November 10, 2022. Pgs. 93-94.

<sup>37</sup> Ibid. pg. 94 of the pdf.

<sup>38</sup> The Subject property is defined in the Host Community Agreement as Exhibit A and B. Siting Application. Pgs. 92 and 94 of the pdf..

<sup>39</sup> Ibid. pg. 94 of the pdf.

<sup>40</sup> Criterion 1 Report, pg. 28 of the pdf.

Republic was successful in **w**inning the two year contract through February 28, 2023 and there are five one-year extensions **t**hrough 2/28/2028.<sup>41</sup>

#### 4.2.2 City of Bloomington Utility Agreement

According to the Criterion 1 **R**eport, the City of Bloomington and TKNTK, LLC, the property owner of the HRC Transfer **s**tation, negotiated a Utility Agreement which allows for utilities to be constructed to serve the HRC TC, and includes a host benefit fee of \$1/ton to be paid to the City of Bloomington for each ton **o**f waste transferred to the landfill. The Utility Agreement also reimburses the City of **B**loomington \$50,000 for professional services related to review or inspection of the utilities **i**nstalled at TKNTK, LLC's expense or for legal fees related to the negotiation of the Utility **A**greement.

#### 4.2.3 Findings

- The proposed HRC TS **i**s **n**ot **n**eeded to provide additional recycling of C&D materials because according to **t**he Siting Application, the infrastructure and operations at the existing HRC are **p**rocessing those materials now:
  - The Criterion 1 **R**eport notes that potentially contaminated C&D loads will be directed to the transfer **s**tation without any processing at HRC to pull out concrete for recycling, which may reduce **t**he amount of C&D recycling occurring at the HRC.
  - The Criterion 2 **R**eport states that no processing equipment for C&D will be available at the HRC TS, just **m**anual segregation of materials that can't be sent to the landfill.
  - The Criterion 2 **R**eport also states that the proposed daily maximum waste receipts by waste type at the **p**roposed HRC TS does not include C&D and only 4% of the incoming waste **s**tream will be SSR.
- The payment of Host **C**ommunity fees to McLean County can be reduced by 50% if the Subject Property **i**dentified in Exhibits A and B of the Host Community Agreement is annexed in the City of **B**loomington.
- Payment of the Host **C**ommunity and Utility Agreement fees does not demonstrate the processing capacity **o**f **t**he HRC TS is necessary to handle the waste diversion and disposal of McLean **C**ounty-generated waste.

<sup>41</sup> Bid Tabulation, Bid #2021-20 **S**olid Waste Disposal Services.

<https://www.bloomingtonil.gov/home/showpublisheddocument/25834/637478754186070000>

## 5.0 Conclusion

Information gathered from private and public sources demonstrates that the **proposed HRC TS is not necessary to accommodate the waste needs of the area that it is intended to serve.**

This conclusion is based on the following factors:

- The Criterion 1 Report did not evaluate the waste generation needs and diversion goals for the Service Area, over the proposed 20 year operating life of the HRC TS, ignoring the waste generation and recycling rate goals in the 2017 McLean County Plan. This resulted in an overestimate of the amount of MSW requiring disposal. The Criterion 1 Report estimated the net waste disposal need of 500 tpd, which is significantly greater than the 137 to 365 tpd projected from the 2017 McLean County Plan.
- One day of observation and truck and trailer counts at the ADS TS was used to estimate the ADS TS processing capacity, which underestimated the actual processing capacity of this facility. The Criterion 1 Report did not factor in to the capacity shortfall evaluation the waste collected by GFL that is likely disposed of by direct haul at the Clinton Landfill or Indian Creek #2 Landfill, or the bulky materials collected at the Municipal Bulk Transfer Station. Additionally, the Tazewell TS could service western communities in the Service Area. The Criterion 1 Report stated the transfer station could only process 300 tpd of MSW, ignoring other transfer stations and landfills that are servicing the Service Area.
- In 2022, the ADS TS received more than 300 tpd of MSW, 78% of the working days, excluding Saturdays. Its peak day was 543 tons. In 2023, the ADS TS received more than 300 tpd, 87% of the working days, excluding Saturdays. Its peak day was 563 tons. On average, the ADS TS has handled 350 tpd during 2023 and has additional processing capacity available to meet the needs of the Service Area demonstrated by daily load records that have reached more than 500 tpd.
- The Criterion 1 Report identified a capacity shortfall of 200 tpd which does not exist. The method used in the Criterion 1 Report to determine waste disposal requirements for the Service Area averaged numbers from two different sources and did not consider the recycling rates achieved by McLean County in 2022. There is sufficient transfer station processing capacity at the ADS TS to handle McLean County's net waste disposal needs, as well as available disposal capacity at landfills near the Service Area.
- The Criterion 1 Report stated that the HRC TS was needed to provide additional capacity for C&D recycling, yet no C&D waste materials are projected to be received at the transfer station as reported in Table 1 in the Criterion 2 Report. The Criterion 2 report also noted there will not be any mechanized equipment to process the recyclables, or separate concrete from the loads at the HRC TS. Manual sorting will be used to remove or separate prohibited waste materials.
- HRC currently has the infrastructure in place at the HRC to recycle, including a sorting facility that allows them to separate recyclables and concrete from non-recyclable materials. The Criterion 1 Report stated he source separated concrete can be crushed and recycled in to saleable projects. The proposed HRC TS will not provide additional capacity to recycle concrete or recyclables, just to load into trailers and transport to nearby landfills.
- The Criterion 1 Report stated that any C&D loads with potentially cross-contaminated materials would be directed to the transfer station, tipped on the transfer station floor and loaded into trailers for disposal, potentially resulting in less recycling of C&D than what is currently happening at the HRC.

- The payment of host fees to McLean County through the Host Community Agreement and host fees to the City of Bloomington through the Utility Agreement will provide fees for the County's use and for funding of Recycling Organizations including the EAC but is not a primary element of defining the waste generation and disposal needs of the Service Area.

## 6.0 Limitation

During the development of this report, TRC relied upon numerous published sources of information, industry research, IEPA databases and a waste tonnage report for the ADS TS. Our report is subject to the following assumptions:

- TRC has relied upon Illinois county solid waste plans, state agency reports, news articles, private company data to prepare this report. TRC does not warrant the accuracy of the data.
- TRC has relied upon the information in the HRC TS Siting Application and has not independently verified the nature of the facility's operation or data provided in the application.
- Information on landfills and transfer stations is from IEPA databases searches and the 2023. Annual Landfill Disposal Capacity Report and TRC does not warrant the accuracy of the data.
- TRC has also relied upon information provided by Republic Services in its analysis of the ADS TS but has not independently verified the data.

## 7.0 References

1. CDM Smith. March 30, 2015. Illinois Commodity / Waste Generation and Characterization Study Update.
2. Ecology Action Center. December 27, 2017. Twenty-Year Materials Recovery and Resource Management Plan for McLean County, Bloomington, and Normal, Illinois.  
<https://ecologyactioncenter.org/wp-content/uploads/2018/04/2017%20McLean%20County%20ISWMP%20FINAL.pdf>
3. Ecology Action Center. 2022. McLean County Solid Waste Program, 2022 Annual Report.
4. GFL Environmental Announces the Acquisition of Peoria Disposal Company and Provides Update on Year to Date M&A Activity. 10/1/2021.  
<https://investors.gflenv.com/English/news/news-details/2021/GFL-Environmental-Announces-the-Acquisition-of-Peoria-Disposal-Company-and-Provides-Update-on-Year-to-Date-MA-Activity/default.aspx> Site visited November 19, 2023.
5. Heil Compaction Truck Compaction Rates.<https://routereadytrucks.com/blogs/rear-loader-truck-specifications/>.
6. Illinois Counties Solid Waste Management Association Website. 2023. Illinois Solid Waste News. Volume 30, Issue 1.
7. IEPA Bureau of Water. August 21, 2015. Public Notice/Fact Sheet Section 401 Water Quality Certification to Discharge into Waters of the State, IEPA Log No.: C-0593-14 CoE appl. #: 2014-1499. Peoria Landfill #3.  
<https://epa.illinois.gov/content/dam/soi/en/web/epa/documents/public-notice/2015/peoria-city-county-landfill/public-notice.pdf>. Viewed 11/21/2023
8. IEPA. July 1, 2021. Illinois Materials Management Advisory Committee Report to the General Assembly. Pg. 118 of the pdf.
9. EPA. 2022. Illinois Landfill Disposal Capacity Report, June 2023.
10. IEPA Agency Facility Inventory and Information Search System (AFIIS) Database search using the search word Transfer  
[.http://epadata.epa.state.il.us/TieFileData/MasterSearchEJ.asp](http://epadata.epa.state.il.us/TieFileData/MasterSearchEJ.asp)
11. IEPA. July 1, 2021. Illinois Materials Management Advisory Committee Report to the General Assembly.
12. [McLean County Waste Generation and Recycling Rates Continue to Grow – Ecology Action Center](#)
13. Peoria City/County Landfill – County Landfill Landing Page.  
<https://www.peoriacounty.gov/203/City-County-Landfill>.
14. Mapquest. Distances of Transfer Stations and Landfills from the proposed HRC TS: [Get Driving Directions, Live Traffic & Road Conditions – MapQuest](#).

## Appendix A Figures

- LEGEND**
- TRANSFER STATION
  - T1 CENTRAL WASTE TRANSFER & RECYCLING
  - T2 AMERICAN DISPOSAL SERVICES OF BLOOMINGTON
  - T3 MUNICIPAL BULK WASTE TRANSFER STATION
  - T4 TAZEWELL TRANSFER STATION
  - T5 CHILLICOTHE RECYCLING & TRANSFER FAC (WIGAND)
  - LANDFILL
  - L1 CLINTON LANDFILL 3
  - L2 LIVINGSTON LANDFILL
  - L3 PEORIA CITY/COUNTY LANDFILL 2
  - L4 PEORIA CITY/COUNTY LANDFILL 3
  - L5 INDIAN CREEK LANDFILL 2

- ★ PROPOSED HRC TRANSFER STATION (HRC)
- SURROUNDING MUNICIPALITY
- HENSON RECYCLING CAMPUS
- TRANSFER STATION SERVICE AREA
- MCLEAN COUNTY
- SURROUNDING COUNTY BOUNDARY
- ▬ MAJOR HIGHWAYS
- ▬ HIGHWAYS

NOTES:  
 BASE MAP: ESRI BASEMAP  
 DATA SOURCE: TRC, IEPA, AFIS DATABASE

PROJECT: REVIEW OF CRITERION 1 REPORT FOR THE PROPOSED HRC TRANSFER STATION

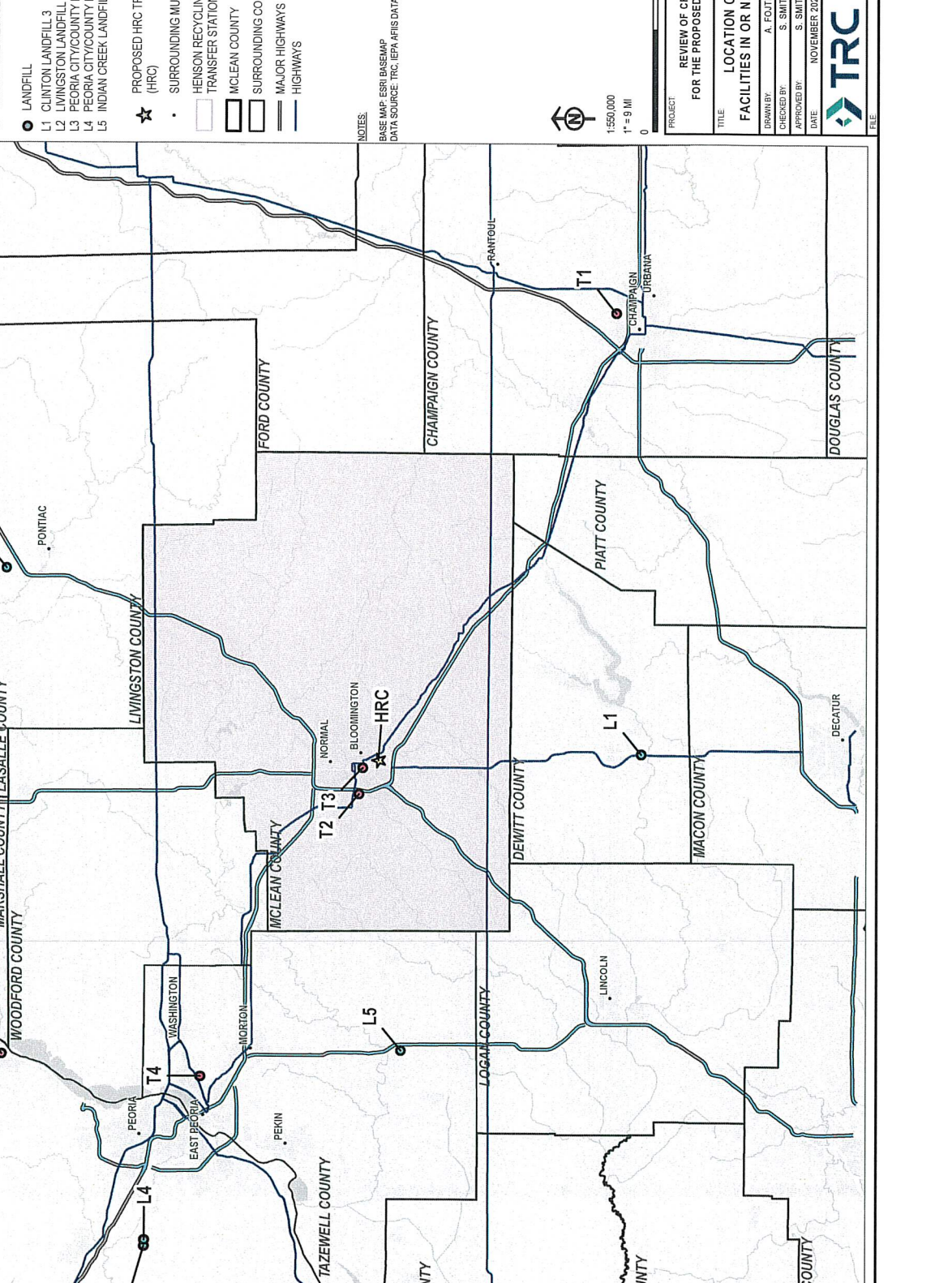
TITLE: LOCATION OF SOLID WASTE FACILITIES IN OR NEAR THE SERVICE AREA

DRAWN BY: A. FOLTJK PROJ. NO. 575242  
 CHECKED BY: S. SMITH  
 APPROVED BY: S. SMITH  
 DATE: NOVEMBER 2023

995 FOURTH DRIVE  
 MADISON, WI 53717  
 PHONE 608.828.3663  
 Broomfield.com

FIGURE 1

1:550,000  
 1" = 9 MI  
 0 18 MILES



# Appendix B

## Tables



Table 1  
McLean County Waste Generation and Net Disposal Projections, 2016 - 2042

2016		2017		2018	
Waste Generation Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year	41.9% Recycling Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year
204,150	120,815	94,804	88,159	124,364	204,271
2019		2020		2021	
Waste Generation Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year	42.16% Recycling Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year
193,102	104,772	181,406	76,487	104,919	187,647
2022		2023		2024	
Waste Generation Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year	50% Recycling Goal Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year
209,907	112,264	209,193	104,597	104,597	208,482
2025		2026		2027	
Waste Generation Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year	50% Recycling Goal Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year
207,773	103,887	207,067	103,533	103,533	206,363
2028		2029		2030	
Waste Generation Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year	60% Recycling Goal Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year
205,661	102,831	204,962	122,977	81,985	204,265
2031		2032		2033	
Waste Generation Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year	60% Recycling Goal Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year
203,571	81,428	202,878	121,727	81,151	202,189
2034		2035		2036	
Waste Generation Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year	70% Recycling Goal Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year
201,501	60,450	200,816	140,571	364 - of 080-p 60,245	200,133

Notes:

1. Data for 2016 from McLean County Solid Waste Program 2022 Annual Report, <https://ecologyactioncenter.org/wp-content/uploads/2023/11/2022-Annual-Solid-Waste-Report.pdf>.
2. Data for 2017 - 2022 from Ecology Action Center Press Release, July 6, 2023, <https://ecologyactioncenter.org/mclean-county-waste-generation-and-recycling-rates-continue-to-grow/>
3. Waste Generation rate expected to decrease .34% per year from Ecology Action Center, December 27, 2017, Twenty-Year Materials Recovery and Resource Management Plan for McLean County, Bloomington, and Normal, Illinois (McLean County 2017 Plan)

Table 1  
McLean County Waste Generation and Net Disposal Projections, 2016 - 2042

2037			2038			2039		
Waste Generation Tons Per Year	80% Recycling Goal Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year	80% Recycling Goal Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year	80% Recycling Goal Tons Per Year	Net Waste for Disposal Tons Per Year
199,453	159,562	39,891	196,775	159,020	39,755	198,099	158,479	39,620
2040			2041			2042		
Waste Generation Tons Per Year	80% Recycling Goal Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year	80% Recycling Goal Tons Per Year	Net Waste for Disposal Tons Per Year	Waste Generation Tons Per Year	80% Recycling Goal Tons Per Year	Net Waste for Disposal Tons Per Year
197,425	157,940	39,485	196,754	157,403	39,351	196,085	156,868	39,217

Notes:

1. Data for 2016 from McLean County Solid Waste Program 2022 Annual Report, <https://ecologyactioncenter.org/wp-content/uploads/2023/11/2022-Annual-Solid-Waste-Report.pdf>.
2. Data for 2017 - 2022 from Ecology Action Center Press Release, July 6, 2023, <https://ecologyactioncenter.org/mclean-county-waste-generation-and-recycling-rates-continue-to-grow/>
3. Waste Generation rate expected to decrease .34% per year from Ecology Action Center, December 27, 2017, Twenty-Year Materials Recovery and Resource Management Plan for McLean County, Bloomington, and Normal, Illinois (McLean County 2017 Plan)

Table 3  
Landfills in or Near the Service Area, November 2023

Label	Organization Name	Owner	Operator	Site Name	Street	City	County	Estimated One Way Travel Distances from Proposed TS	2022 Disposal Volume (Post-Compaction, In-place Cubic Yards (CY))	Remaining Capacity Reported (In-place CY) 11/1/2023	Life Expectancy in Years
L1	Clinton Landfill Inc	GFL	GFL	Clinton Landfill 3	9550 Heritage Rd	Clinton	De Witt	26 miles	621,905	21,987,441	37
L2	Livingston Landfill	Republic Services	Republic Services	Livingston Landfill	14206 E 2100 N Rd	Pontiac	Livingston	44 miles	1,236,084	22,374,106	21
L3	Peoria City/County Landfill #2	Peoria City/County	Waste Management	Peoria City/County Landfill #2	11501 Cottonwood Rd	Brimfield	Peoria	60 miles	194,280	265,448	1
L4	Peoria City/County Landfill 3	Peoria City/County	GFL	Peoria City/County Landfill 3	11501 Cottonwood Rd	Brimfield	Peoria	60 miles	0	7,000,000	36
L5	Indian Creek Landfill #2	GFL	GFL	Indian Creek Landfill #2	24501 W McMullen Rd	Hopedale	Tazewell	40 miles	336,539	10,504,777	27

**NOTES:**

1. Data downloaded from the IEPA AFIS Database search using the search work Transfer <http://epadata.epa.state.il.us/TieFileData/MasterSearchEJ.asp>
2. Data for the counties was added from the database List of Municipalities in Illinois. Source: [https://en.wikipedia.org/wiki/List\\_of\\_municipalities\\_in\\_Illinois](https://en.wikipedia.org/wiki/List_of_municipalities_in_Illinois)
3. The Landfills were identified in the 2022 Illinois Landfill Disposal Capacity Report.
4. Information on Peoria City/County Landfill 3 taken from <https://www.peoriacounty.org/203/City-County-Landfill>.
5. GFL announces the acquisition of Peoria Disposal including Peoria City/County Landfill 3. <https://investors.sflenv.com/English/news/news-details/2021/GFL-Environmental-Announces-the-Acquisition-of-Peoria-Disposal-Company-and-Provides-Updates-on-Year-to-Date-MIA-Activity/default.aspx>
6. The capacity of Peoria City/County Landfill 3 is 10 million tons, estimated as 7 million in place CY using an in-place density of 1,400 pound per cubic yard. IEPA Permit Log C-0593-14 Fact Sheet, August 21, 2015. [https://iepa.illinois.gov/content/dam/iepa/web/iepa/documents/public\\_notices/2015/peoria-city-landfill-3-fact-sheet.pdf](https://iepa.illinois.gov/content/dam/iepa/web/iepa/documents/public_notices/2015/peoria-city-landfill-3-fact-sheet.pdf)
7. The remaining capacity for Peoria City/County Landfill 3 is estimated as 36 years calculated as 7 million in-place CY Volume divided by 194,280 in-place CY volume received in 2022.
8. Travel distances determined using MapQuest <https://www.mapquest.com/directions>. Viewed November 21, 2023.

Table 4  
Transfer Stations in or Near the Service Area, November 2023

Label	Organization Name	Site Name	Owner/Operator	Estimated One Way Travel Distances from Proposed HRC TS	Street	City	County
T1	Central Waste Transfer & Recycling	Central Waste Transfer & Recycling	Republic Services	48 miles	921 W. Saline Court	Urbana	Champaign
T2	American Disposal Services of Bloomington	American Disposal Services of Bloomington	Republic Services	5 miles	2112 W. Washington Street	Bloomington	McLean
T3	Municipal Bulk Waste Transfer Station	Municipal Bulk Waste Transfer Station	City of Bloomington	2 miles	402 S East St	Bloomington	McLean
T4	Tazewell Transfer Station	Tazewell Transfer Station	Waste Management	45 miles	3550 E. Washington Avenue	East Peoria	Tazewell
T5	Chillicothe Recycling & Transfer Fac (Wigand)	Chillicothe Recycling & Transfer Fac	GFL	53 miles	19908 N Rte 29	Chillicothe	Peoria

NOTES:

1. Data downloaded from the IEPA AFIS Database search using the search work Transfer <http://easdata.epa.state.il.us/Files/Data/MasterSearchEJ.asp>
2. Data for the counties was added from the database List of Municipalities in Illinois. Source: [https://en.wikipedia.org/wiki/List\\_of\\_municipalities\\_in\\_illinois](https://en.wikipedia.org/wiki/List_of_municipalities_in_illinois)
3. Mileage distances were calculated from MapQuest: <https://www.mapquest.com/directions>

Table 5  
Summary of Incoming and Outgoing MSW Tons at the ADS/Bloomington Transfer Station

Year	Total Working Days/Working days less Saturdays	Number of Days Incoming Waste > 500 Tons	Number of Days Incoming Waste > 400 Tons	Number of Days Incoming Waste > 300 Tons	Average Tons of Incoming Waste in Tons, All Working Days	Average Tons of Incoming Waste in Tons, No Saturdays	Number of Days the Daily Trailer Loads >18	Number of Days the Daily Trailer Loads are 16-18	Number of Days the Trailer Loads < 16 per day	Average Trailer Loads per day	Number of Days Total Outbound Tons >500	Number of Days Total Outbound Tons >400	Number of Days Total Outbound Tons > 300	Average Daily Outbound Tons Excluding Saturdays
2022	311 / 259	1	26	203	278	330	11	68	205	13	1	30	200	328
2023 (1/1 - 11/19/2023)	276 / 230	5	35	199	300	348	35	67	125	15	5	44	180	344

- Notes:
1. Data for 2022 and 2023 through November 19, 2023 was provided by D. Winters, Republic Services Area Manager, November 2023.
  2. In 2022, the incoming waste tons exceeded 300 tons per day 65% of the time. If Saturdays are excluded from the database, the transfer station handled more than 300 tons per day, 78% of the time.
  3. In 2022, the incoming waste tons exceeded 400 tons per day, 72% of the time. If Saturdays are excluded from the database, the transfer station handled more than 400 tons per day, 87% of the time.
  4. In 2022, the incoming waste tons exceeded 500 tons per day, 7% of the time. If Saturdays are excluded from the database, the transfer station handled more than 500 tons per day, 20% of the time.
  5. In 2022, ADS transported more than 500 tpd one day and more than 400 tpd 30 days, including Saturdays.
  6. In 2022, ADS TS transported more than 300 tpd to the landfill, 78% of the time, excluding Saturdays.
  7. In 2023, ADS transported more than 500 tpd on five separate days, with the highest transported tonnage of 582 tons.
  8. In 2023, ADS TS transported more than 300 tpd to the landfill, 79% of the time, excluding Saturdays.