EXECUTIVE SUMMARY

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Introduction

Veolia E.S. Zion Landfill, Inc. has prepared the following Application to expand the currently operating Veolia E.S. Zion Landfill vertically and horizontally in accordance with Section 39.2 of the Illinois Environmental Protection Act and the City of Zion Pollution Control Facility Siting Ordinance.

The expansion, termed the Site 2 East Expansion, will provide approximately 10 years of solid waste disposal capacity to the City of Zion and neighboring communities. Safely managing the service area's waste is a necessary public service that Veolia has provided for many years. The proposed Expansion will allow Veolia to continue providing this important public function in a safe and cost-effective manner.

Collectively, Old Site 2 and the Site 2 Expansion are referred to as the Veolia E.S. Zion Landfill. Old Site 2 is a non-hazardous solid waste unit that was regulated under 35 IAC, Part 807. Old Site 2 commenced landfilling operations on December 23, 1981. In 1993, a final cover system was constructed over the site. The Site 2 Expansion was granted by the Zion City Council on April 17, 1995, which approved a new landfill unit east of Old Site 2 including a "piggyback" onto the eastern portion of Old Site 2. The proposed Site 2 East Expansion will expand vertically over portions the 1995 Site 2 Expansion area and also horizontally to the east.

Veolia E.S. Zion Landfill, Inc. and the surrounding communities have enjoyed a mutually beneficial partnership for many years. The approval of this Application will allow this partnership to continue and provide an affordable, safe disposal option for residents and businesses in the service area.

Summary of the Regulatory Approval Process

The Application for siting approval represents the first of several regulatory and permitting steps which must be completed before a new or expanded pollution control facility can be constructed. During this first step, an Application is presented to the local siting authority, which is the City of Zion. The applicant must demonstrate that the landfill expansion will comply with Section 39.2 of the Illinois Environmental Protection Act (Act) and the City of Zion Pollution Control Facility Siting Ordinance. Both establish nine criteria with which an applicant must demonstrate compliance. These nine criteria are as follows:

1. The facility is necessary to accommodate the waste needs of the area that it is intended to serve;

2. The facility is so designed, located and proposed to be operated that the public health, safety and welfare will be protected;

3. The facility is located so as to minimize incompatibility with the character of the surrounding area and to minimize the effect on the value of the surrounding property;

4. The facility (sanitary landfill) is located outside the boundary of the 100-year floodplain;

5. The plan of operations for the facility is designed to minimize the danger to the surrounding area from fire, spills, or other operational accidents;

6. The traffic patterns to or from the facility are so designed as to minimize the impact on existing traffic flows;

7. If the facility will be treating, storing or disposing of hazardous waste, an emergency response plan exists for the facility which includes notification, containment and evacuation procedures to be used in case of an accidental release;

8. If the facility is to be located in a county where the county board has adopted a solid waste management plan consistent with the planning requirements of the Local Solid Waste Disposal Act or the Solid Waste Planning and Recycling Act, the facility is consistent with the plan; and

9. If the facility will be located within a regulated recharge area, any applicable requirements specified by the Board for such areas have been met.

When considering Criterion 2 and Criterion 5 of the preceding nine criteria the local siting authority may also consider as evidence the previous operating experience and past record of convictions or admissions of violations of the applicant (and any subsidiary or parent corporation) in the field of solid waste management.

Local siting approval may be granted by the local siting authority after its review of the Application. Conditions to the siting Application may be added ("siting conditions") to the Application based on its review as a condition of approval.

If siting approval is received from the local siting authority, the facility must then apply for a permit from the Illinois Environmental Protection Agency (IEPA). This permit Application will focus on the engineering issues in even greater detail, shifting the focus away from local land use issues. The design presented during the siting process may be modified or revised to incorporate additional technical detail as approved by the IEPA.

Once an IEPA development permit is received, facility construction may be initiated. Construction activities will be completed under the supervision of a licensed Professional Engineer within the State of Illinois. Upon completion of construction, the Professional Engineer will submit documentation to the IEPA that demonstrates that construction was completed in accordance with the minimum standards and requirements established within the Construction Quality Assurance (CQA) Program and the conditions of the permit. The IEPA will review the CQA report to determine whether the Facility has been properly constructed and may grant an operating permit to begin accepting waste if the IEPA determines that the Facility construction meets the rigorous permitting and regulatory standards.

It should be noted that as each new area is developed, additional certification must be obtained from the IEPA. This process ensures that the Facility is subjected to continuing technical review from the IEPA, thereby assuring the public that the Facility will continue to be developed and operated in a safe and environmentally sound manner.

Need (Section 1)

Section 1 of this Application demonstrates that the proposed Facility is necessary to accommodate the waste disposal needs of Lake County and other counties within the service area. Factors supporting this conclusion include:

- ❑ Lake County communities have historically relied on local landfills, including the Veolia ES Zion Landfill, for disposal capacity. Unlike other counties in the Chicago metropolitan area, there are no transfer stations in Lake County and the County disposes of most of its waste by direct haul to local landfills.

- ❑ Historically, most of the County's waste has been disposed at 3 facilities: the Veolia ES Zion Landfill, the Countryside Landfill (located near Grayslake) and the Pheasant Run Landfill (located in Kenosha County, Wisconsin). These landfills reported a combined remaining capacity of 9,572,000 tons as of January 1, 2009. In December, 2009, the Pheasant Run Landfill received approval for an expansion of 5,710,000 tons. Based on their combined intake of 1,985,000 tons of waste in 2008, the three landfills have approximately 6 ½ years of combined remaining capacity (as of the date of this report).

- ❑ The Veolia ES Zion Landfill had a remaining capacity of 3,345,000 tons of waste as of January 1, 2009 and took in 657,000 tons of waste in 2008. The Facility therefore has approximately 4 years of remaining life based on 2008 disposal volumes (as of the date of this report). Based on projected average disposal quantities of 3,100 tons of waste per day (886,600 tons per year), the Facility has approximately 3 years of remaining life (as of the date of this report).

- ❑ The Solid Waste Agency of Lake County (SWALCO), the designated solid waste planning authority for Lake County, entered into a solid waste disposal agreement with the Veolia ES Zion Landfill in 1994. Under this agreement, the landfill accepted set-aside capacity for Lake County waste. Because waste volumes from Lake County have exceeded the annual set-aside amount, the Landfill's capacity commitment is estimated to have been fulfilled in 2007 instead of 2018 as anticipated when the disposal agreement was signed. Likewise, the set-aside capacity at the Countryside Landfill is estimated to have been fulfilled in 2008 versus 2016 as originally anticipated. This demonstrates that Lake County relies on local disposal capacity.

- ❑ The County's Solid Waste Management Plan (as updated) recommends that the County rely on privately owned and operated landfills for disposal capacity.

- ❑ In particular, the County's 2004 Plan Update recommends that existing disposal agreements (including the agreement with the Veolia ES Zion Landfill) be maintained to provide disposal capacity.

- ❑ Moreover, the 2004 Plan Update recommends that the County secure additional landfill capacity to meet the County's needs for a 20-year period. The proposed expansion of the Veolia ES Zion Landfill will help the County to address a portion of that need.

- ❑ The service area is projected to grow in population, which will lead to greater quantities of waste that must be managed.

- ❑ The capacity deficit within the service area over the analysis period 2009-2022 is approximately 104,282,000 tons, significantly greater than the estimated 12,298,000 tons of capacity the expanded Facility will provide.

- ❑ Even if more distant landfills are considered, the Chicago metropolitan region has only approximately 12 years of permitted capacity as of the date of this report. This is far less than the 20 years recommended for Lake County by the 2004 Plan Update. Moreover, most of this regional capacity is not available to Lake County because of the extended distance to the landfills and because there are no transfer stations in Lake County.

These findings demonstrate that the Facility is necessary to accommodate the waste needs of the area that it is intended to serve.

Protection of the Public Health, Welfare, and Safety (Section 2)

Section 2 of the Application provides significant details regarding the numerous safeguards that are incorporated into the design of the Site 2 East Expansion. The proposed Facility uses the latest landfill design concepts that have been implemented at other facilities and shown to be protective of the environment. In many cases, the stringent design and performance standards contained in the state and federal landfill regulations have been exceeded in the design of the Site 2 East Expansion. The Facility design works in conjunction with a suitable location and favorable site geology to assure that the public health, safety and welfare will be protected.

Location (Section 2.1)

The proposed location of the Facility has been evaluated to determine whether it is appropriate for development. This review has included archeological investigations, wetland investigations, a review of endangered species and threatened species, FEMA floodplain maps, and other location considerations. The Facility location has been determined to meet or exceed all location criteria for its development based on this rigorous review.

The existing Facility has conducted landfill operations since 1976. An expansion of the existing landfill is consistent with historic uses. Veolia will use setbacks, berms, and landscaping to isolate disposal operations from the surrounding area. The proposed Facility will meets setback requirements and all federal, states, and local location criteria specified by applicable regulations.

Hydrogeology (Section 2.2)

The Facility hydrogeology has been extensively studied and has been found to be highly suitable for landfill development. Multiple hydrogeologic investigations have been conducted at the site prior to the most recent investigation. Data collected during the previous hydrogeologic investigation activities was obtained through the advancement of over 250 borings (over 100 of which were continuously sampled) and the installation of over 200 monitoring wells. The most recent site investigation included a review of previous site investigations and the advancement of an additional ten borings within the expansion area.

The Site 2 East Expansion will be located on a site that has natural geologic features that are favorable to landfill development. The proposed Site 2 East Expansion area is classified by Potential for Contamination of Shallow Aquifers in Illinois, (Berg and Kempton, 1984) as an area with low aquifer sensitivity with respect to land burial of municipal solid waste and uniform,

relatively impermeable silty or clayey till. The site is also located in an area that has been classified by Larson (1973) as being geologically optimal for development of a landfill within Lake County.

A low-permeability cohesive soil (Wadsworth Formation) is present across the site, which will separate the footprint of the proposed Site 2 East Expansion from the uppermost aquifer. The cohesive soil will act as a permanent barrier and supplemental protective feature of the Site 2 East Expansion by restricting contaminant movement from the Expansion in both vertical and horizontal directions.

Engineered Design (Section 2.3)

A number of engineered design features have been incorporated into the Site 2 East Expansion to safely contain the waste materials placed in it. These containment systems are briefly summarized below:

Composite Liner. The Site 2 East Expansion has been designed with a composite liner system consisting of a minimum 5-foot thick compacted cohesive soil liner with a maximum permeability 1 x 10^{-7} cm/sec and a 60-mil high density polyethylene (HDPE) geomembrane (or equivalent). The composite liner system will prevent the release of potential contaminants from the landfill and perform at a level which exceeds state, and federal standards. The liner system has been computer modeled, and the computer analysis demonstrates that the proposed landfill will not impact existing or future groundwater quality.

Leachate Collection. Liquids that come in contact with waste are known as leachate. These liquids are managed such that they will not impact the environment. The proposed Site 2 East Expansion has been designed with a leachate collection system consisting of a one-foot thick permeable granular drainage layer placed above the composite liner on the landfill floor and sideslopes. The leachate collection layer drains to collection points located along the perimeter of the waste boundary. Leachate will be removed from these collection points and managed at a properly licensed treatment Facility, if not recirculated.

Final Cover. After sections of the landfill are filled to their intended height, a final cover system will be constructed to cap the waste. The final cover system of the landfill consists of a low-permeability layer to prevent precipitation from entering the landfill and landfill gas from leaving, and is overlain by a protective soil layer used to prevent erosion and maintain the long-term integrity of the cap.

The low-permeability layer will include a double-sided 40-mil liner linear low density polyethylene (LLDPE) geomembrane and a two-foot thick compacted cohesive soil layer with a maximum permeability of 1 x 10^{-6} cm/sec. A double-sided geocomposite drainage net will overlay the geomembrane to drain infiltrated water away from the low-permeability layer.

Additional soils will be placed over the geocomposite in a two layer fashion, and will include, from the bottom up: a minimum of 2.5 feet of protective cover soil and six inches of vegetative cover soil. The overall slope of the final cover will be a maximum of 3H:1V. In order to minimize the potential for erosion, the final slopes of the landfill will be vegetated.

Landfill Gas Collection. Typically, generation of significant quantities of landfill gas occurs for a period of thirty to forty years after placement. The Site 2 East Expansion will expand the active landfill gas collection system in the proposed waste expansion area to remove and control methane and other air emissions. The current Facility can generate up to

approximately 6.7 megawatts of electricity from landfill gas, which can power approximately 6,000 homes.

The proposed landfill gas system consists of pipes placed at intervals in the waste material consistent with the existing collection system. A vacuum will be applied through the pipes to withdraw the landfill gas within the waste. The extracted gas will be flared, or will be used as a renewable energy resource that can be recovered to generate electricity or provide heat. Landfill gas emissions from the proposed Expansion will be controlled in accordance with applicable regulations, including the Clean Air Act New Source Performance Standards (NSPS) and 35 Ill. Admin. Code requirements.

Stormwater Management (Section 2.4)

The Stormwater Management Plan for the Site 2 East Expansion has been designed to collect, route, and detain stormwater runoff from the Facility in an environmentally sound manner. The Stormwater Management Plan for the landfill expansion contains design features that meet or exceed the state regulations applicable to stormwater management and the Lake County Watershed Development Ordinance (LCWDO).

The proposed system is designed to manage stormwater in the area of the landfill and reduce the flooding potential of downstream areas. Stormwater will be directed away from the landfill waste boundary. Stormwater which contacts waste will be contained and treated as leachate and will not discharge to off-site waterways.

In general, stormwater will be directed along either terrace berms or benches to downslope flume pipes along the side slopes of the final landform. The downslope flumes will discharge into energy dissipator structures and then into perimeter ditches located at the toe of the sideslopes. Stormwater runoff will then be conveyed to stormwater basins designed to detain the 100-year, 24-hour storm event. The Plan incorporates two existing basins located along the south side of the landfill and one proposed basin to the east of the proposed expansion. The detention basins will allow the controlled and gradual release of stormwater to offsite drainage areas. Water from the proposed Detention Basin 5R will discharge into a vegetated bioswale prior to draining offsite.

Construction Quality Assurance Program (Section 2.5)

The purpose of the Construction Quality Assurance (CQA) Program is to assure that landfill design features (such as the composite liner) are constructed as specified. The CQA Program includes oversight during construction, testing of construction materials, and documentation of inspection and testing activities. A third-party licensed professional engineer must certify that the constructed features at the landfill meet or exceed design standards.

Operating Plan (Section 2.6)

An Operating Plan has been prepared to guide the daily and long-term operations at the Site 2 East Expansion. The purpose of the Operating Plan is to assure that landfill activities are conducted in a safe, efficient manner. The Operating Plan includes procedures to prevent odors, dust, litter and noise from becoming a nuisance to neighbors. A waste acceptance program will be implemented to assure that prohibited materials (such as regulated hazardous waste) are not disposed at the landfill. Training and safety procedures will be employed to make the landfill a safe workplace for employees and the community. Contingency plans have also been prepared to halt or modify landfill operations in the event of natural disasters or other emergencies.

Groundwater Impact Evaluation (Section 2.7)

In order to verify the performance of the proposed landfill design within the existing hydrogeologic setting, a Groundwater Impact Evaluation (GIE) was performed. As part of this evaluation, a computer model was used to predict the impact on groundwater quality assuming multiple and simultaneous failures of the engineered design features. The computer model employed for this purpose has been accepted by state and federal regulatory agencies as well as landfill design professionals. The results of the groundwater modeling demonstrate that the Site 2 East Expansion is protective of the public health, safety, and welfare.

Groundwater Monitoring (Section 2.8)

A network of groundwater monitoring wells will surround the landfill footprint (waste disposal area) of the Site 2 East Expansion. These monitoring wells will be located no further than 50 feet from the edge of the landfill footprint and therefore well within the 100-foot compliance boundary. The calculated monitoring efficiency (ability to detect contaminant mitigation from the landfill) was determined to be over 99.5%, exceeding state requirements.

The monitoring wells will be routinely sampled and tested during the operating life of the landfill and for at least 30 years after the landfill stops accepting waste. Wells will be tested for numerous chemicals to verify that the landfill is performing as designed and that groundwater quality is not being impacted.

Closure and Post-Closure Care Plan (Section 2.9)

A Closure and Post-Closure Care Plan has been developed for the Site 2 East Expansion. The Plan has been developed to provide the necessary steps to ensure proper closure of the Facility, as well as continued maintenance of the Facility during the post-closure care period. As part of the plan, a detailed cost estimate has been developed that conservatively assumes that a third party will complete these closure and maintenance tasks.

Veolia will be required to post financial assurance in the amount of this cost estimate with the IEPA. The Closure and Post-Closure Care Plan and cost estimate will be required to be updated on an annual basis and be reviewed and accepted by the IEPA. This financial assurance mechanism assures that the necessary funds to responsibly close and manage the landfill will be in-place in the unlikely event that Veolia becomes insolvent.

Development and Review of Design

The Site 2 East Expansion has been designed by experienced landfill engineers and scientists based on thorough and comprehensive investigations and analyses of regional and site-specific conditions. These engineers and scientists have designed numerous landfills that are operating safely, and have reviewed many other landfill facilities on behalf of local governments. The design of the Site 2 East Expansion draws on this collective experience of dozens of landfills.

The regulatory process in Illinois requires that landfills must first be approved by the local siting authority and subsequently by the Illinois Environmental Protection Agency (IEPA). In many cases, the level of design work and site investigations is significantly higher in the IEPA permit Application than in the Application initially submitted to the siting authority. The information contained in this Application for the Site 2 East Expansion represents the higher level of design and investigation typically associated with an IEPA permit Application. Moreover, the landfill

design and hydrogeologic investigation have been peer reviewed by recognized experts in the solid waste engineering field as an added element of the design process.

Section 2 Summary

Protection of groundwater is often the principal concern expressed by citizens with respect to a proposed new landfill. The following points indicate how the design elements noted above work in concert to assure that the Site 2 East Expansion will safeguard groundwater resources.

- ❏ The design includes a leachate collection system to remove liquids from the landfill. The uncontrolled movement of leachate is a principal mechanism by which potential contaminants in the landfill might ultimately find their way to groundwater. The leachate collection system, however, prevents these liquids from building up within the landfill.

- ❏ The composite liner system (consisting of 5 feet of recompacted clay and a poyethylene liner) acts as a very effective barrier underneath the landfill to prevent leachate from potentially migrating from the landfill.

- ❏ A minimum of 75 feet of low-permeability soil material will remain in-place below the existing cohesive soil below the landfill invert and the top of the underlying aquifer.

- ❏ The landfill cover system represents a “liner” on top of completed portions of the landfill that prevents rain or other precipitation from even entering the landfill and becoming leachate.

- ❏ The design features noted above act as multiple, independent safeguards against contaminants leaving the landfill.

- ❏ The network of groundwater monitoring wells, is designed to detect contaminants at a point 50 feet from the landfill footprint, well before the property boundary.

Landfill gas will be collected for beneficial use at the proposed Expansion by expanding the existing collection system. As previously noted, the current Facility can generate up to approximately 6.7 megawatts of electricity from landfill gas, which can power approximately 6,000 homes.

In short, a sound location, favorable site geology, a modern design that incorporates the latest landfill technologies and design practices, best operating practices and long-term landfill maintenance and monitoring will assure that the proposed Site 2 East Expansion protects the public health, safety and welfare.

Land Use / Real Estate (Section 3)

Section 3 demonstrates that the proposed Facility is located so as to minimize incompatibility with the character of the surrounding area and to minimize the effect on the value of the surrounding property. A land use analysis has been prepared by The Lannert Group, Inc. and a real estate study has been performed by Integra Realty Resources, Inc. The conclusions of these studies are summarized below:

- ❑ The dominant land use surrounding the Facility is open space and agriculture representing approximately 59%. The proposed end use plan of "open space" is consistent with these existing uses.

- ❑ Residential land uses near the Facility have developed after the construction and operation of the existing landfill began.

- ❑ Existing buffers and setbacks help to screen the daily operations from the residential uses. The proposed setbacks and buffers continue these minimization techniques.

- ❑ Industrial uses to the west of Green Bay Road contribute to the character of the surrounding area.

- ❑ The proposed Landscape Plan buffers the Facility's frontage along N. Kenosha Road with significant setbacks, berms, and plantings. Existing berms and plantings along the south side screen established subdivisions from daily operations. The proposed setbacks and buffers continue these minimization techniques.

- ❑ The End Use Plan is proposed as passive open space and complements the proposed light industrial and business park complex along Green Bay Road.

- ❑ The City of Zion developed a Master Comprehensive Plan adopted in 1997 stating that the City annexed nearly 1,000 acres along Illinois State Highway 131/Green Bay Road, the area of the Facility, for the purpose of developing a light industrial and business park complex.

- ❑ The real estate study demonstrates that there is minimal impact on the value of surrounding properties located in close proximity to the existing landfill.

Floodplains (Section 4)

Section 4 of this Application documents that the proposed area of expansion is not located within a regulatory 100-year floodplain, based on Flood Insurance Rate maps for Lake County, Illinois, prepared by the Federal Emergency Management Agency (FEMA). The proposed Facility will not restrict the flow of a 100-year flood from off-site areas, reduce the temporary water storage capacity, or result in the washout of solid waste. Additionally, the Facility Stormwater Management Plan will help reduce the likelihood of flooding by providing stormwater detention for stormwater runoff from the landfill.

Fire/Spill/Accident Prevention (Section 5)

Section 5 of this Application demonstrates that the proposed Facility is designed to minimize the danger to the surrounding area from fire, spills, or other operational accidents. In addition to the operating plan, the Applicant has developed an Emergency Preparedness Program and numerous Health and Safety policies that emphasize site safety training and proper safety procedures during day-to-day operations and during emergency situations.

Traffic (Section 6)

Kenig, Lindgren, O'Hare, Aboona, Inc. (KLOA) prepared Section 6 of this Application which demonstrates that traffic patterns to or from the Facility are so designed as to minimize the impact on the existing traffic flows. Conclusions from the traffic impact analysis are summarized below:

- ❏ The proposed traffic routes to and from the Facility are consistent with the current routes.
- ❏ The traffic generated by the proposed Facility will account for less than three percent of the peak hour traffic at any of the intersections within the study area.
- ❏ The anticipated demands of the expanded landfill can be safely and efficiently accommodated on the existing roadway system.

Hazardous Waste Ban (Section 7)

Section 7 of this Application documents that the proposed Expansion will not be treating, storing or disposing of hazardous waste. The Site 2 East Expansion of the Veolia E.S. Zion Landfill will not knowingly accept, treat, store, or dispose of hazardous waste. Veolia E.S. Zion Landfill, Inc. will comply with all federal and state regulations pertaining to the handling and disposal methods of waste at the Facility. Veolia E.S. Zion Landfill, Inc. has implemented a comprehensive load checking plan as described in the Operating Plan (Section 2.6) to reduce the potential for hazardous waste to be accepted. Veolia maintains an Emergency Preparedness Plan to be followed in the event of an accidental release.

Solid Waste Management Plan Consistency (Section 8)

Section 8 of the Application documents that the Site 2 East is consistent with and will continue to meet the goals and recommendations of the Lake County Solid Waste Management Plan (Plan). This conclusion is supported by the following considerations:

- ❏ The solid waste system identified in the 2004 Plan Update calls for all waste which is not reduced by recycling or other waste diversion activities to be landfilled. Thus, landfilling is the preferred disposal alternative in the County's updated Plan.
- ❏ The 2004 Plan Update recommends that existing disposal agreements with privately-owned landfills, including the Veolia ES Zion Landfill, be maintained. The proposed expansion is consistent with this recommendation and the County's historical reliance on privately-owned landfills for disposal capacity.
- ❏ The 2004 Plan Update recommends that the County acquire additional landfill capacity to meet its disposal needs for a twenty year period. The proposed

expansion of the Veolia ES Zion Landfill will provide additional disposal capacity to the City of Zion and Lake County and will help the County to fulfill this goal.

- ❑ In accordance with the 2004 Plan Update, amended May, 2009, Veolia ES Zion Landfill, Inc. has entered into a Host City Agreement with the City of Zion. Other agreements have been negotiated with SWALCO and Lake County, the Zion Park District and the Village of Winthrop Harbor. The Agreement with Lake County and SWALCO provides that the proposed expansion is consistent with the County's Solid Waste Plan.

Regulated Recharge Areas (Section 9)

Section 9 of this Application demonstrates that the proposed Facility is not located within a regulated recharge area and that, in fact, there are currently no regulated recharge areas established in Lake County.

Operating Experience of Applicant (Section 10)

Section 10 of this Application describes the operating experience of Veolia E.S. Zion Landfill, Inc. and its parent corporation, Veolia ES Solid Waste, Inc. Veolia ES Solid Waste, Inc. is one of the largest solid waste management organizations in North America, providing a full range of services to commercial, industrial, and residential customers in 12 states, the Bahamas and Canada. They operate 74 collection facilities and 31 solid waste sanitary landfill facilities in the United States and Canada.

Conclusion

This Application for local siting approval provides the required documentation to satisfy all requirements contained within Section 39.2 of the Illinois Environmental Protection Act and the City of Zion Pollution Control Facility Siting Ordinance. The Site 2 East Expansion has been designed to provide environmentally sound and cost effective long-term disposal capacity to the service area. Veolia E.S. Zion Landfill, Inc. has enjoyed a mutually beneficial partnership with City of Zion and surrounding communities over the past several years. Approval of this Application will continue this partnership for many more years.