

Documents Distributed to the County Board at the Meeting

Committee of the Whole November 9, 2010

Contents:

1. Champaign County Regional Housing Study Preliminary Results
Justice Item VII.A
Pages 1-10
2. Application from Robert Palinkas for Nursing Home Board of Directors
Appointment
Policy Item IX.B.2 under Appointments/Reappointments
Pages 11-18
3. General Corporate Fund FY2010 Revenue/Expenditure Projection Report
Finance Item X.E.1 under County Administrator
Pages 19-21
4. Harris & Harris Monthly Collections Report
Finance Item X.E.3 under County Administrator
Pages 22-27
5. Resolution Authorizing the Issuance of Tax Anticipations Warrants of the County
of Champaign, Illinois
Finance Item X.E.13 under County Administrator
Pages 28-45
6. List of Purchases Not Following Purchasing Policy
Finance Item X.G.1 under Auditor
Page 46

Items Distributed During Public Participation

7. Draft Resolution from Alan Nudo Establishing Guidelines for the Champaign
County 2011 Apportionment Plan, Pages 47-48
8. Items Regarding the Clinton Landfill & the Mahomet Aquifer, Pages 49-67
9. Map of Illinois Legal Self-Help Centers from Barbara Kessel, Page 68



Champaign County
November 9, 2010

Champaign County Regional Housing Study

Background

- **April 2010** – RFP is issued soliciting for the Champaign County Regional Housing Study.
- Champaign County is a primary partner in this process, along with the City of Urbana, the Village of Rantoul, the Housing Authority of Champaign County and the City of Champaign.
- **July 2010** – Project commences
- **November 2010** – Project completion

Champaign County (all) For-Sale Housing Demand

- Within Champaign County, there is a current inventory of 1,879 single-family homes/buildable lots.
- We estimate a demand for 386 units per year.
- This surplus will address single-family, for-sale housing demand in all of Champaign County for several years, even if no other single-family housing is built.

Champaign County (excluding the Cities of Urbana, Champaign and the Village of Rantoul) For-Sale Housing Demand

- Within Champaign County, there is a current inventory of 415 single-family homes/buildable lots.
- We estimate a demand for 175 units per year.
- This surplus will address single-family, for-sale housing demand in Champaign County for several years, even if no other single-family housing is built.

Champaign County (all) Condominium Demand

- There is an inventory of 52 unsold condominiums in Champaign County.
- We estimate an annual demand for 104 condominium units.
- This surplus will address one-half of the projected 2010 demand.
- 228 units have been planned or proposed. If they are all built, there will once again be a surplus of units.

Champaign County (excluding the Cities of Urbana, Champaign and the Village of Rantoul) Condominium Demand

- There is no inventory of unsold condominiums.
- We estimate an annual demand for 41 condominium units.

Rental Housing Demand

- There are two reasons for increased need for rental housing.
 - Replacement of obsolete housing stock
 - New renter population
- VSI calculates
 - Projected growth by income segment based upon historic trends
 - Replacement of housing stock built before 1970

Champaign County (all areas)

Rental Housing Demand

	Income < \$20,000	Income \$20,000-\$50,000	Income > \$50,000
Units needed annually between 2010-2015	13.6	9.6	112.6
Total units needed between 2010-2015	68	48	563

Champaign County (excluding the Cities of Urbana, Champaign and the Village of Rantoul) Rental Housing Demand

	Income < \$20,000	Income \$20,000-\$50,000	Income > \$50,000
Units needed annually between 2010-2015	15.4	-56.4	-70.2
Total units needed between 2010-2015	77	-282	-351



November 8, 2010

Robert D. Palinkas, M.D.
9391 E. 2250 N Road
Danville, IL 61834
H: 217-776-2456
W: 217-244-5345
Cell: 217-213-8388
Fax: 217-244-1758
E-mail: Palinkas@illinois.edu

APPLICATION FOR APPOINTMENT TO THE BOARD OF DIRECTORS OF THE
CHAMPAIGN COUNTY NURSING HOME

Statement of Experience: Please refer to the accompanying curriculum vitae.

Here is my statement regarding a wish to serve on the Champaign County Nursing Home Board of Directors:

As a medical administrator and physician I have a long-standing interest in the delivery of health care services. This interest has expanded from my normal every day responsibilities to include nursing home activities due to the recent time my father has board would enrich my understanding of the health care system for older individuals, and broaden my experience as a medical administrator.

Additionally, I feel that I have much to offer as an experienced administrator who has worked with both unionized and non-unionized staff. I have significant experience in management of financial affairs and for large and similar sized operations, and my medical background in internal medicine and infectious disease lends itself to involvement in matters of public health.

Thank you for any consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Palinkas', written over a horizontal line.

Robert D. Palinkas, M.D.

RDP/mjc

Robert D. Palinkas, M.D.
November 8, 2010

STATEMENT OF OUTSIDE ACTIVITIES

In addition to the items listed in my curriculum vitae submitted to the Champaign County governing body, I wish to disclose certain outside activities which have little or no impact to my appointment to the Advisory Board of the Champaign County Nursing Home.

In addition to my 100%, 12-month appointment to the University of Illinois as an administrator and physician at the McKinley Health Center, and as a member of the faculty of the College of Medicine, I conduct the following outside activities:

1. I am currently chairman of the Vaccine Preventable Disease Committee of the American College Health Association.
2. I am a member of the adult working group of the Centers for Disease Control Advisory Committee on Immunization Practice.
3. I am a regular unpaid advisor to the Department of Defense, often functioning as a civilian observer or advisor to military exercises and operations.

None of these unpaid activities represent a conflict on my part since these agencies do not conduct business with or compete with services of the Champaign County Nursing Home, or render other services in competition with the Champaign County Nursing Home or any of its related entities.



Robert D. Palinkas, M.D.

RDP/mjc

CURRICULUM VITAE

ROBERT D. PALINKAS, M.D.
9391 E. 2250 North Road
Danville, IL 61834
(217) 244-5345 (work)
(217) 776-2456 (home)

EDUCATION:

1973 June	<u>Bachelor of Arts</u> William Paterson University Wayne, New Jersey Cum Laude
1977 June	<u>Doctor of Medicine</u> New Jersey Medical School Newark, New Jersey

POSTDOCTORAL TRAINING:

July 1980–June 1981	Fellow in Infectious Diseases New Jersey Medical School Affiliated Hospital
July 1979–June 1980	Chief Medical Resident College Hospital (now University Hospital) Newark, New Jersey
July 1977–June 1980	Medicine Residency New Jersey Medical School Affiliated Hospitals Newark, New Jersey
July 1977–June 1978	Medicine Internship New Jersey Medical School Affiliated Hospitals Newark, New Jersey

LINCENSURE

Illinois 036-105311

CERTIFICATION

National Board of Medical Examiners	1978
American Board of Internal Medicine	1982

UNIVERSITY APPOINTMENTS

2003-Present	<u>Clinical Assistant Professor of Medicine</u> University of Illinois College of Medicine at Urbana-Champaign
1993-2001	<u>Clinical Assistant Professor of Medicine</u> Jefferson Medical College
1991-1993	<u>Assistant Professor of Clinical Medicine</u> University of Medicine and Dentistry of New Jersey New Jersey Medical School – Univ. Hospital
1983-1990	<u>Clinical Assistant Professor of Medicine</u> University of Medicine and Dentistry of New Jersey New Jersey Medical School – Univ. Hospital
1981-1983	<u>Instructor of Medicine</u> University of Medicine and Dentistry of New Jersey New Jersey Medical School – University Hospital

EMPLOYMENT HISTORY-HOSPITAL APPOINTMENTS

Aug 2001- Present	Director and Staff Physician McKinley Health Center University of Illinois at Urban-Champaign
July 1993-Aug 2001	<u>Associate, Department of General Internal Medicine</u> <u>And Program Director, Internal Medicine</u> Geisinger Medical Center, Danville, PA
July 1981-June 1993	<u>Attending Physician</u> University of Medicine and Dentistry of New Jersey New Jersey Medical School – University Hospital

PROFESSIONAL POSITIONS (Other)

1983 – 1993	Lecturer in Sexually Transmitted Diseases Centers for disease Control (CDC) Regional Training Center Newark, New Jersey
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HONORS

Recipient, Golden Apple Award for
Excellence in Teaching
From Medical Class 1982
New Jersey Medical School

Recipient, Education Service Award
From Medical Class 1984
New Jersey Medical School

Recipient, Teaching Award from
University Hospital Housestaff
1984
New Jersey Medical School

Recipient, Teaching Award from
Medical Class 1987
New Jersey Medical School

Recipient, Junior Medicine Award
New Jersey Medical School Class
of 1986

Recipient, Golden Apple Award for
Excellence in Teaching
Medical Class of 1987
New Jersey Medical School

Recipient, UMDNJ-Foundation Award
for Excellence in Teaching
1986-87

Recipient, Golden Apple Award for
Excellence in Teaching
Medical Class of 1988
New Jersey Medical School

Recipient, Golden Apple Award for
Excellence in Teaching
Medical Class of 1989
New Jersey Medical School

Recipient, Golden Apple Award for
Excellence in Teaching
Medical Class of 1990
New Jersey Medical School

Recipient, New Jersey School Education
and Service Incentive Award
1991-92

HONORS (Continued)

Recipient, Golden Apple Award for
Excellence in Teaching
Medical Class of 1993
New Jersey Medical School

Recipient, William Paterson College
School of Science Award for
Outstanding Contribution
1992

Recipient, Osler Teaching Award
Department of medicine
Geisinger Medical Center
2001

Recipient, Chancellor's Academic Professional
Excellence Award
University of Illinois
2010

COMMITTEES

Member, Academic Policies and Procedures
Committee
New Jersey Medical School
1982-84

Member, Pharmacy and Therapeutics
Committee
University Hospital, Newark, NJ
1983-87

Member, New Jersey Statewide AIDS
Task Force
1983-86

Member, Student Affairs Committee
New Jersey Medical School
1985-87 and 1991-92

Chairman, Antibiotic Utilization
Review Committee
University Hospital
1985-86

Member, Institutional Development
Committee
New Jersey Medical School
1987-88

Member, Board of Trustees
AIDS Resource A non government organization
Annual budget \$500,000-\$1,000,000
1999-2001

ADMINISTRATIVE RESPONSIBILITIES-

- Aug 2001–Present Director, McKinley Health Center
Staff Physician
University of Illinois at
Urbana-Champaign
- July 1993-Aug 2001 Associate, Department of General Internal Medicine
And Program Director, Internal Medicine
Geisinger Medical Center, Danville, PA
- July 1993-Aug 2001 Program Director, Internal Medicine Residency
Staff Physician
Geisinger Medical Center
Danville, PA
- July 1985–June 1993 Division Director, Division of General Internal Medicine
Section Leader, Medical Informatics
Staff Physician
Department of Medicine
New Jersey Medical School
- Coordinator for Senior Student Acting
Internship in Medicine
- Coordinator, Third Year Rotation in
Medicine
- Vice Chairman for Ambulatory Services,
Department of Medicine
New Jersey Medical School
- July 1981-June 1993 Staff Physician
UMDNJ-University Hospital
Newark, NJ
- July 1981–June 1985 Course Coordinator, Introduction to
Clinical Sciences and Physical
Diagnosis
- Course Co-Director, Emergency and
Critical Care Medicine
New Jersey Medical School
- Course Coordinator, Introduction
to Clinical Sciences and Physical
Diagnosis
- Clinical Course Coordinator, Emergency
and Critical Care Medicine
New Jersey Medical School

BIBLIOGRAPHY

Palinkas, R; Smith L: Prevention of Overwhelming Sepsis in the Asplenic Patient. Journal of the Medical Society of New Jersey. 74(9):743-745, September 1977.

Holtz, H; Dobro, J; Palinkas, R; Kapila, R; Oleske, J: Psychosocial Impact of Acquired Immune Deficiency Syndrome [Letter] JAMA. 250(2): (6), 1983 Jul 8.

Profeta, S; Forrester, C; Eng, RHK; Liu, R; Johnson, E, Palinkas, R; and Smith SM: Salmonella infections in Patients with Acquired Immunodeficiency Syndrome. Archives of Internal Medicine. 145(4):670-672, April 1985.

Llinas, L; Ogilvie, P; and Palinkas, R: Improving Resident Exposure through Development of a Migrant Farm Worker Clinic, (Abstract) spring meeting of the Association of Program Directors of Medicine, March 27-28, 2001, Atlanta, GA.

FY2010 General Corporate Fund Revenue Projection Report

November 8, 2010

SIGNIFICANT REVENUE LINE ITEMS/CATEGORIES	FY2009 YTD 10/31/2009	FY2009 ACTUAL 12/31/2009	FY2010 BUDGET 12/1/2009	FY2010 YTD 10/31/2010	Projected % to be Received	Projected \$\$ to be Received	\$ Difference to Original Budget
PROPERTY TAXES (CURRENT)	\$7,535,880	\$7,861,688	\$8,089,543	\$7,744,694	100%	\$8,049,095	-\$40,448
PROPERTY TAXES (ESCROW)				\$0	0%	\$0	\$0
PROPERTY TAXES (BACK)	\$0	\$6,227	\$5,200	\$10,914	210%	\$10,914	\$5,714
MOBILE HOME TAXES	\$0	\$9,191	\$10,000	\$0	100%	\$10,000	\$0
PAYMENT IN LIEU OF TAXES	\$4,623	\$4,623	\$3,200	\$5,100	159%	\$5,100	\$1,900
COUNTY HOTEL/MOTEL TAX	\$26,584	\$31,857	\$31,000	\$21,945	86%	\$26,679	-\$4,321
COUNTY AUTO RENTAL TAX	\$12,347	\$15,137	\$17,500	\$12,783	91%	\$15,986	-\$1,514
PENALTIES ON TAXES	\$392,215	\$754,106	\$575,000	\$312,042	101%	\$578,405	\$3,405
BUSINESS LICENSES & PERMITS	\$40,903	\$40,258	\$41,980	\$30,671	73%	\$30,671	-\$11,310
NON-BUSINESS LIC. & PERMITS	\$784,671	\$865,418	\$691,216	\$753,510	118%	\$818,484	\$127,268
FEDERAL GRANTS	\$326,969	\$421,206	\$633,084	\$397,459	100%	\$633,084	\$0
STATE GRANTS	\$176,164	\$221,386	\$234,625	\$158,140	100%	\$234,625	\$0
STATE SHARED REVENUE							
CORP. PERS. PROP. REPL. TAX	\$742,181	\$782,058	\$812,347	\$671,058	97%	\$786,283	-\$26,064
1% SALES TAX (UNINCORPOR.)	\$865,734	\$1,038,170	\$1,165,705	\$872,696	91%	\$1,062,864	-\$102,841
1/4% SALES TAX (ALL COUNTY)	\$3,923,785	\$4,750,176	\$4,887,487	\$4,014,486	100%	\$4,887,153	-\$334
USE TAX	\$359,184	\$417,999	\$456,266	\$329,693	86%	\$392,828	-\$63,438
INHERITANCE TAX	\$125,991	\$143,520	\$165,709	\$325,965	197%	\$325,965	\$160,256
STATE REIMBURSEMENT	\$1,781,291	\$1,782,018	\$1,196,402	\$1,169,477	100%	\$1,196,402	\$0
SALARY REIMBURSEMENT	\$248,501	\$248,501	\$305,186	\$247,777	81%	\$247,777	-\$57,409
STATE REV./SALARY STIPENDS	\$42,000	\$43,125	\$43,196	\$38,159	88%	\$38,159	-\$5,037
INCOME TAX	\$2,094,558	\$2,243,895	\$2,650,000	\$1,927,158	86%	\$2,284,149	-\$365,851
CHARITABLE GAMES LIC/TAX	\$0	\$0		\$0	0%		
OFF-TRACK BETTING	\$69,803	\$79,841	\$87,500	\$40,951	53%	\$46,482	-\$41,018
LOCAL GOVERNMENT REVENUE							
LOCAL GOVERNMENT REVENUE	\$517,801	\$572,184	\$587,698	\$696,238	126%	\$739,073	\$151,375
LOCAL GOVERNMENT REIMBURSE.	\$561,619	\$685,313	\$534,300	\$421,859	97%	\$517,944	-\$16,356
GENERAL GOVERNMENT	\$3,578,318	\$4,226,052	\$4,624,412	\$3,486,698	90%	\$4,179,053	-\$445,359
FINES	\$788,803	\$954,634	\$997,500	\$867,707	106%	\$1,056,834	\$59,334
FORFEITURES	\$13,404	\$39,059	\$8,000	\$8,441	106%	\$8,441	\$441
INTEREST EARNINGS	\$60,243	\$80,710	\$73,000	\$43,923	92%	\$67,011	-\$5,989
RENTS & ROYALTIES	\$838,189	\$864,684	\$553,677	\$502,497	111%	\$611,858	\$58,181
GIFTS & DONATIONS	\$12,600	\$12,600	\$18,004	\$14,591	91%	\$16,298	-\$1,706
OTHR FIN. SOURCES--FIX. ASSETS	\$24,420	\$24,738	\$8,000	\$15,692	196%	\$15,692	\$7,692
OTHR. MISC. REVENUE	\$1,125,222	\$1,135,477	\$95,450	\$74,312	85%	\$81,353	-\$14,097
INTERFUND TRANSFERS	\$1,325,710	\$1,732,784	\$1,770,510	\$1,335,845	100%	\$1,770,510	\$0
INTERFUND REIMBURSEMENTS	\$91,051	\$122,374	\$423,923	\$131,460	100%	\$423,923	\$0
OTHER FINANCING SOURCES							
TOTALS	\$28,490,763	\$32,211,010	\$31,796,620	\$26,683,941	98%	\$31,169,096	-\$627,524

FY2010 General Corporate Fund Expenditure Projection Report

SIGNIFICANT EXPENDITURE LINE ITEMS/CATEGORIES	FY2009 YTD 10/31/2009	FY2009 ACTUAL 12/31/2009	FY2010 BUDGET 12/1/2009	FY2010 ACTUAL 10/31/2010	PROJECTED % TO BE SPENT	PROJECTED \$ TO BE SPENT	\$ Difference to Original BUDGET (+/-)
PERSONNEL							
Regular Salaries & Wages	\$11,832,312	\$13,365,032	\$12,535,700	\$10,945,665	99.90%	\$12,522,988	-\$12,712
SLEP Salaries	\$6,074,595	\$6,912,877	\$6,854,880	\$6,064,362	101.22%	\$6,938,266	\$83,386
SLEP Overtime	\$262,285	\$335,372	\$401,676	\$228,439	73.93%	\$296,963	-\$104,713
Fringe Benefits	\$2,261,011	\$2,471,406	\$2,503,708	\$2,259,611	98.46%	\$2,465,030	-\$38,678
COMMODITIES							
Postage	\$229,551	\$231,062	\$244,920	\$161,217	67.65%	\$165,697	-\$79,223
Purchase Document Stamps	\$480,000	\$480,000	\$455,800	\$445,800	105.49%	\$480,827	\$25,027
Gasoline & Oil	\$126,440	\$155,018	\$211,505	\$142,102	79.84%	\$168,859	-\$42,646
All Other Commodities	\$522,477	\$677,248	\$583,821	\$402,722	94.74%	\$553,116	-\$30,705
SERVICES							
Gas Service	\$369,081	\$410,906	\$538,793	\$340,296	74.49%	\$401,323	-\$137,470
Electric Service	\$746,122	\$879,648	\$974,737	\$763,573	94.12%	\$917,425	-\$57,312
Medical/Professional Services	\$1,063,726	\$1,157,842	\$1,198,072	\$948,647	86.27%	\$1,033,523	-\$164,549
All Other Services	\$3,320,792	\$3,815,806	\$3,498,805	\$2,895,769	98.15%	\$3,434,196	-\$64,609
CAPITAL							
Vehicles	\$1,911	\$79,692	\$19,140	\$19,140	100.00%	\$19,140	\$0
All Other Capital	\$152,613	\$206,728	\$212,865	\$55,625	100.00%	\$212,865	\$0
TRANSFERS							
To Capital Improvement Fund	\$0	\$58,934	\$148,668	\$0	100.00%	\$148,668	\$0
To Nursing Home Fund	\$1,000,000	\$0	\$0	\$0	0.00%	\$0	\$0
To Public Health Fund	\$0	\$45,000	\$0	\$0	0.00%	\$0	\$0
To Self-Funded Insurance	\$0	\$0	\$0	\$0	0.00%	\$0	\$0
All Other Transfers	\$65,442	\$1,114,364	\$177,657	\$57,463	100.00%	\$177,657	\$0
DEBT REPAYMENT	\$349,178	\$357,928	\$363,206	\$357,366	100.00%	\$363,206	\$0
TOTAL	\$28,857,533	\$32,754,865	\$30,923,953	\$26,087,798	97.98%	\$30,299,748	-\$624,205

FY2010 General Corporate Fund Projection Summary Report

SUMMARY

	<u>Actual</u>	Unreserved Fund Balance
FUND BALANCE 11/30/09	\$1,853,899	\$1,520,772
BEGINNING FUND BALANCE % OF BUDGET -	6.00%	4.92%
	<u>Budgeted</u>	<u>Projected</u>
ADD FY2010 REVENUE	\$31,796,620	\$31,169,096
LESS FY2010 EXPENDITURE	\$30,923,953	\$30,299,748
Revenue to Expenditure Difference	\$872,667	\$869,348
FUND BALANCE PROJECTION - 11/30/10	\$2,726,566	\$2,723,247
% OF 2010 Budget	8.82%	8.99%
Outstanding Loan to Nursing Home	-\$333,127	-\$333,127
Unreserved Fund Balance Projection - 11/30/10	\$2,393,439	\$2,390,120
% of FY2010 Budget	7.74%	7.73%

General Corp Summary

Account	Account Name	County Line #	Total Payments	January	February	March	April	May
5400	Bond Fees	080-030-341.36	\$2,665.00	\$30.00	\$90.00	\$110.00	\$1,030.00	\$50.00
5940	Bond Forfeitures	080-041-351.10	\$3,947.68	\$88.00	\$8.00		\$2,894.00	\$131.84
5220	Circuit Clerk Filing Fees	080-030-341.36	\$41,873.84	\$336.00	\$5,391.34	\$11,098.13	\$5,072.54	\$3,975.55
5323	County Ordinance	080-041-351.15	\$5,008.39	\$15.00	\$829.00	\$1,140.39	\$745.72	\$443.97
5222	County Traffic (38.675%)	080-030-341.36	\$36,988.14	\$150.84	\$5,732.72	\$10,607.96	\$3,390.38	\$2,796.21
5320	Court Finance Fees	080-030-341.36	\$5,473.74	\$85.00	\$582.35	\$1,724.41	\$680.98	\$351.66
5240	Court Security	080-140-341.19	\$24,128.15	\$201.00	\$4,045.70	\$5,559.72	\$3,041.44	\$2,213.86
5530	Crime Laboratory Fees	080-030-341.36	\$269.83	\$5.00	\$38.57	\$52.06	\$51.80	\$33.65
5420	Criminal Surcharge	080-030-341.36	\$188.73	\$0.10	\$20.12	\$43.52	\$29.64	\$15.18
5654	Domestic Battery	080-030-341.36	\$13.50	\$1.00	\$0.00	\$5.50	\$1.00	\$3.00
5409	DUI Fine	080-040-351.11	\$265.00		\$100.00			
5410	Fines	080-040-351.10	\$22,851.68	\$424.00	\$1,398.06	\$5,631.25	\$3,565.11	\$1,242.39
5208	Motion to Vacate	080-030-341.36	\$359.10		\$1.25	\$80.85	\$182.00	
5215	Notices Mailed First Class	080-030-341.36	\$2,435.56	\$18.00	\$333.56	\$595.61	\$304.00	\$188.00
5325	Overage & Shortage Fees	080-030-341.36	\$200.00					
5282	Preliminary Hearing Fees	080-041-341.10	\$128.20	\$10.00	\$7.70			\$25.25
5470	Public Defender Fees	080-036-341.10	\$897.00		\$370.00			
5337	Regular Drug Fines	080-041-351.10	\$479.96				\$31.56	\$31.68
5270	Sheriff's Fees	080-040-341.10	\$3,100.91	\$121.00	\$209.47	\$988.90	\$332.61	\$202.18
5620	Spinal Cord	080-030-341.36	\$4.56		\$0.60	\$0.60	\$0.60	\$0.48
5532	State Offender DNA	080-030-341.36	\$384.10		\$50.47	\$82.48	\$25.44	\$66.80
5280	States Attorney Fees	080-041-341.10	\$10,487.65	\$150.00	\$1,626.20	\$2,569.46	\$1,282.85	\$866.89
5335	Street Value Drug Fine	080-041-351.10	\$821.01	\$4.87	\$85.26	\$184.31	\$45.97	\$120.37
5421	Traffic/Criminal Surcharge	080-030-341.36	\$572.51	\$11.07	\$117.54	\$117.91	\$66.90	\$45.99
5610	Trauma Fund	080-030-341.36	\$131.76	\$0.74	\$19.54	\$23.01	\$15.73	\$15.17
5385	Unsatisfied Judgment	080-041-351.10	\$4,780.15	\$200.00		\$210.38	\$392.51	\$223.51
5273	Work Release Fees	080-140-341.28	\$866.97		\$214.93	\$399.93	\$114.96	\$39.73
Totals:			\$169,323.12	\$1,851.62	\$21,272.38	\$41,226.38	\$23,297.74	\$13,083.36

General Corp Summary

Account	Account Name	County Line #	Total Payments	June	July	August	September	October
5400	Bond Fees	080-030-341.36	\$2,665.00	\$90.00	\$515.00	\$455.00	\$175.00	\$120.00
5940	Bond Forfeitures	080-041-351.10	\$3,947.68	\$131.84	\$154.00	\$304.00	\$236.00	
5220	Circuit Clerk Filing Fees	080-030-341.36	\$41,873.84	\$4,008.55	\$2,917.31	\$2,874.90	\$3,835.12	\$2,364.40
5323	County Ordinance	080-041-351.15	\$5,008.39	\$448.97	\$333.42	\$326.92	\$490.00	\$235.00
5222	County Traffic (38.675%)	080-030-341.36	\$36,988.14	\$2,821.35	\$3,065.52	\$3,905.42	\$2,791.52	\$1,726.22
5320	Court Finance Fees	080-030-341.36	\$5,473.74	\$401.66	\$527.90	\$401.61	\$458.05	\$260.12
5240	Court Security	080-140-341.19	\$24,128.15	\$2,233.35	\$1,743.02	\$1,527.63	\$2,327.86	\$1,234.57
5530	Crime Laboratory Fees	080-030-341.36	\$269.83	\$18.73	\$15.33	\$22.43	\$9.81	\$22.45
5420	Criminal Surcharge	080-030-341.36	\$188.73	\$18.83	\$15.54	\$16.43	\$20.83	\$8.54
5654	Domestic Battery	080-030-341.36	\$13.50			\$2.00		\$1.00
5409	DUI Fine	080-040-351.11	\$265.00			\$65.00	\$100.00	
5410	Fines	080-040-351.10	\$22,851.68	\$1,870.99	\$2,049.18	\$2,775.18	\$3,399.40	\$496.12
5208	Motion to Vacate	080-030-341.36	\$359.10			\$40.00	\$15.00	\$40.00
5215	Notices Mailed First Class	080-030-341.36	\$2,435.56	\$190.00	\$204.00	\$252.00	\$212.39	\$138.00
5325	Overage & Shortage Fees	080-030-341.36	\$200.00			\$200.00		
5282	Preliminary Hearing Fees	080-041-341.10	\$128.20	\$35.25	\$20.00	\$10.00	\$10.00	\$10.00
5470	Public Defender Fees	080-036-341.10	\$897.00	\$150.00	\$100.00	\$105.00		\$172.00
5337	Regular Drug Fines	080-041-351.10	\$479.96	\$375.70	\$14.34	\$26.68		
5270	Sheriff's Fees	080-040-341.10	\$3,100.91	\$211.72	\$412.94	\$356.63	\$209.33	\$56.13
5620	Spinal Cord	080-030-341.36	\$4.56	\$0.48	\$0.32	\$0.64	\$0.36	\$0.48
5532	State Offender DNA	080-030-341.36	\$384.10	\$67.50	\$19.56	\$23.91	\$20.96	\$26.98
5280	States Attorney Fees	080-041-341.10	\$10,487.65	\$876.89	\$875.08	\$726.37	\$949.08	\$564.83
5335	Street Value Drug Fine	080-041-351.10	\$821.01	\$107.82	\$27.22	\$43.17	\$98.44	\$103.58
5421	Traffic/Criminal Surcharge	080-030-341.36	\$572.51	\$49.29	\$36.29	\$38.15	\$49.21	\$40.16
5610	Trauma Fund	080-030-341.36	\$131.76	\$17.60	\$4.76	\$17.62	\$7.02	\$10.57
5385	Unsatisfied Judgment	080-041-351.10	\$4,780.15	\$309.19	\$223.51	\$334.89	\$2,541.91	\$344.25
5273	Work Release Fees	080-140-341.28	\$866.97	\$58.96	\$19.23	\$19.23		
Totals:			\$169,323.12	\$14,494.67	\$13,293.47	\$14,870.81	\$17,957.29	\$7,975.40

Agency Summary

Agency Name	Total Payments	December	January	February	March	April	May	June
Champaign County Sheriff	\$13,118.68		\$434.00	\$1,177.29	\$2,033.32	\$880.83	\$853.88	\$1,310.40
Champaign Township	\$40.05							
City of Champaign	\$70,110.59		\$607.27	\$11,277.88	\$11,724.75	\$9,903.72	\$9,303.79	\$5,851.12
Champaign Township	\$666.84			\$557.84	\$109.00			
Village of Fisher	\$405.07			\$245.77		\$9.30		
Village of Gifford	\$348.75			\$142.75	\$106.00			
Hensley Township	\$271.44			\$242.52				
Village of Homer	\$656.31			\$28.92	\$169.50	\$315.50		\$28.92
Illinois State Police	\$39,900.42		\$255.00	\$5,441.40	\$13,243.47	\$4,263.25	\$2,547.28	\$2,545.63
Village of Ludlow	\$638.61				\$111.92			\$193.92
Village of Mahomet	\$1,138.06			\$349.62	\$86.76		\$86.76	\$136.00
Mahomet Township	\$28.92							\$28.92
Village of Ogden	\$86.62							\$31.01
Parkland College	\$176.92						\$176.92	
Village of Philo	\$29.68						\$28.92	\$0.76
Village of Rantoul	\$14,164.94			\$3,337.32	\$3,002.33	\$1,013.54	\$1,692.40	\$889.27
St. Joseph Township	\$86.76				\$28.92	\$0.00	\$28.92	
Somer Township	\$1,573.92		\$0.00	\$501.00	\$34.79	\$0.00	\$65.21	\$294.00
Sidney Township	\$84.55		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Secretary of State Police	\$93.44							
Village of St. Joseph	\$385.00							
Village of Savoy	\$362.42			\$28.92	\$37.83	\$95.67		\$200.00
Village of Thomasboro	\$1,751.61			\$28.92	\$293.77	\$132.83	\$296.09	
Village of Tolono	\$1,930.17			\$887.00	\$154.44	\$176.08		\$107.73
Tolono Township	\$160.54						\$160.54	
University of Illinois	\$6,552.90			\$829.13	\$1,350.07	\$511.77	\$1,284.60	\$231.36
City of Urbana	\$20,069.18		\$252.01	\$4,327.79	\$4,400.38	\$1,868.26	\$1,575.89	\$1,852.06
Urbana Township	\$1,676.03			\$53.00		\$0.00	\$123.95	\$807.00
Totals:	\$176,508.42	\$0.00	\$1,548.28	\$29,457.07	\$36,887.25	\$19,170.75	\$18,225.15	\$14,508.10

Agency Summary

Agency Name	Total Payments	July	August	September	October	November
Champaign County Sheriff	\$13,118.68	\$1,600.87	\$2,056.03	\$2,647.08	\$124.98	\$0.00
Champaign Township	\$40.05		\$40.05	\$0.00	\$0.00	\$0.00
City of Champaign	\$70,110.59	\$5,161.63	\$4,826.44	\$7,350.42	\$4,103.57	\$0.00
Champaign Township	\$666.84			\$0.00	\$0.00	\$0.00
Village of Fisher	\$405.07			\$150.00	\$0.00	\$0.00
Village of Gifford	\$348.75		\$100.00	\$0.00	\$0.00	\$0.00
Hensley Township	\$271.44		\$28.92	\$0.00	\$0.00	\$0.00
Village of Homer	\$656.31			\$113.47	\$0.00	\$0.00
Illinois State Police	\$39,900.42	\$1,870.08	\$3,320.90	\$2,501.47	\$3,911.94	\$0.00
Village of Ludlow	\$638.61		\$28.92	\$303.85	\$0.00	\$0.00
Village of Mahomet	\$1,138.06		\$450.00	\$28.92	\$0.00	\$0.00
Mahomet Township	\$28.92			\$0.00	\$0.00	\$0.00
Village of Ogden	\$86.62		\$26.69	\$28.92	\$0.00	\$0.00
Parkland College	\$176.92			\$0.00	\$0.00	\$0.00
Village of Philo	\$29.68			\$0.00	\$0.00	\$0.00
Village of Rantoul	\$14,164.94	-\$65.56	\$1,705.51	\$1,515.35	\$1,074.78	\$0.00
St. Joseph Township	\$86.76		\$28.92	\$0.00	\$0.00	\$0.00
Somer Township	\$1,573.92	\$28.92	\$356.00	\$294.00	\$0.00	\$0.00
Sidney Township	\$84.55	\$0.00	\$0.00	\$84.55	\$0.00	\$0.00
Secretary of State Police	\$93.44	\$35.60		\$28.92	\$28.92	\$0.00
Village of St. Joseph	\$385.00	\$180.00	\$205.00	\$0.00	\$0.00	\$0.00
Village of Savoy	\$362.42			\$0.00	\$0.00	\$0.00
Village of Thomasboro	\$1,751.61			\$1,000.00	\$0.00	\$0.00
Village of Tolono	\$1,930.17		\$400.00	\$36.00	\$168.92	\$0.00
Tolono Township	\$160.54			\$0.00	\$0.00	\$0.00
University of Illinois	\$6,552.90	\$1,233.30	\$431.82	\$367.59	\$313.26	\$0.00
City of Urbana	\$20,069.18	\$2,016.05	\$880.03	\$1,712.44	\$1,184.27	\$0.00
Urbana Township	\$1,676.03	\$601.00	\$91.08	\$0.00	\$0.00	\$0.00
Totals:	\$176,508.42	\$12,661.89	\$14,976.31	\$18,162.98	\$10,910.64	\$0.00

YTD Account Summary

Account Description	<i>Total: YTD</i>	<i>County: YTD</i>	<i>State: YTD</i>	<i>Agency: YTD</i>	<i>Other: YTD</i>	<i>Float</i>
% Breakdown-County	\$36,988.14	\$36,988.14	\$0.00	\$0.00	\$0.00	\$0.00
% Breakdown-State	\$16,143.36	\$0.00	\$16,143.36	\$0.00	\$0.00	\$0.00
Arrestee's Medical	\$4,376.44	\$4,376.44	\$0.00	\$0.00	\$0.00	\$0.00
Automation	\$12,750.20	\$12,750.20	\$0.00	\$0.00	\$0.00	\$0.00
Bond Fees	\$2,665.00	\$2,665.00	\$0.00	\$0.00	\$0.00	\$0.00
Bond Forfeitures	\$5,559.84	\$5,559.84	\$0.00	\$0.00	\$0.00	\$0.00
Circuit Clerk Filing Fees	\$45,882.39	\$41,873.84	\$0.00	\$0.00	\$0.00	\$4,008.55
City Attorney Fees	\$310.00	\$0.00	\$0.00	\$310.00	\$0.00	\$0.00
Clerk Operation/Administration	\$130.00	\$130.00	\$0.00	\$0.00	\$0.00	\$0.00
Collection Fees	\$158,400.30	\$0.00	\$0.00	\$0.00	\$158,400.30	\$0.00
Construction Safety	\$1,109.00	\$0.00	\$1,109.00	\$0.00	\$0.00	\$0.00
County Ordinance	\$5,011.00	\$5,011.00	\$0.00	\$0.00	\$0.00	\$0.00
Court Finance Fees	\$5,730.89	\$5,730.89	\$0.00	\$0.00	\$0.00	\$0.00
Court Security	\$24,069.06	\$24,069.06	\$0.00	\$0.00	\$0.00	\$0.00
Crime Laboratory Fees	\$2,948.52	\$269.83	\$2,429.33	\$0.00	\$0.00	\$249.36
Crime Stoppers	\$1,021.65	\$0.00	\$0.00	\$1,021.65	\$0.00	\$0.00
Criminal Surcharge	\$9,443.89	\$188.73	\$9,254.91	\$0.00	\$0.00	\$0.25
Document Storage	\$12,294.28	\$12,294.28	\$0.00	\$0.00	\$0.00	\$0.00
Domestic Battery	\$135.00	\$13.50	\$121.50	\$0.00	\$0.00	\$0.00
Domestic Violence	\$1,912.39	\$0.00	\$1,912.39	\$0.00	\$0.00	\$0.00
Driver's Education	\$14,661.25	\$0.00	\$14,661.25	\$0.00	\$0.00	\$0.00
Drug Court Program	\$1,450.99	\$1,450.99	\$0.00	\$0.00	\$0.00	\$0.00
Drug Fund - Local	\$523.00	\$0.00	\$0.00	\$523.00	\$0.00	\$0.00
Drug Fund Assessment	\$13,312.59	\$0.00	\$13,312.59	\$0.00	\$0.00	\$0.00
DUI - 80% Illinois	\$2,689.29	\$0.00	\$2,689.29	\$0.00	\$0.00	\$0.00
DUI Fine	\$1,337.32	\$0.00	\$1,069.85	\$267.45	\$0.00	\$0.02
Fines	\$189,280.92	\$10,946.32	\$0.00	\$178,334.60	\$0.00	\$0.00
Fire Prevention Fund	\$158.04	\$0.00	\$158.04	\$0.00	\$0.00	\$0.00
Fire Truck Revolving Fund	\$165.00	\$0.00	\$165.00	\$0.00	\$0.00	\$0.00

YTD Account Summary

Account Description	<i>Total: YTD</i>	<i>County: YTD</i>	<i>State: YTD</i>	<i>Agency: YTD</i>	<i>Other: YTD</i>	<i>Float</i>
Foreign Service Fees	\$57.00	\$0.00	\$0.00	\$57.00	\$0.00	\$0.00
Late Fees	\$64,951.62	\$64,951.62	\$0.00	\$0.00	\$0.00	\$0.00
LEADS Maintenance Fund	\$1,880.50	\$0.00	\$1,880.50	\$0.00	\$0.00	\$0.00
Mandatory Assessment	\$723.08	\$0.00	\$723.08	\$0.00	\$0.00	\$0.00
Motion to Vacate	\$359.10	\$359.10	\$0.00	\$0.00	\$0.00	\$0.00
Notices Mailed First Class	\$2,480.48	\$2,480.48	\$0.00	\$0.00	\$0.00	\$0.00
Overage & Shortage Fees	\$200.00	\$200.00	\$0.00	\$0.00	\$0.00	\$0.00
Preliminary Hearing Fees	\$128.20	\$128.20	\$0.00	\$0.00	\$0.00	\$0.00
Prison Review Board	\$0.50	\$0.00	\$0.50	\$0.00	\$0.00	\$0.00
Probation Monitoring Fees	\$26,471.38	\$26,471.38	\$0.00	\$0.00	\$0.00	\$0.00
Public Defender Fees	\$1,021.12	\$1,021.12	\$0.00	\$0.00	\$0.00	\$0.00
Regular Drug Fines	\$1,647.35	\$481.96	\$192.22	\$206.56	\$0.00	\$766.61
Restitution	\$49,735.43	\$0.00	\$0.00	\$0.00	\$49,735.43	\$0.00
School District Fine	\$150.00	\$0.00	\$0.00	\$150.00	\$0.00	\$0.00
Serious Traffic Violations	\$360.00	\$70.00	\$210.00	\$0.00	\$0.00	\$80.00
Sex Offender Registration	\$80.78	\$0.00	\$80.78	\$0.00	\$0.00	\$0.00
Sheriff's Fees	\$3,125.70	\$3,125.70	\$0.00	\$0.00	\$0.00	\$0.00
Spinal Cord	\$190.00	\$4.56	\$185.05	\$0.00	\$0.00	\$0.39
State Offender DNA	\$7,671.22	\$383.40	\$7,287.44	\$0.00	\$0.00	\$0.38
States Attorney Fees	\$10,623.29	\$10,623.29	\$0.00	\$0.00	\$0.00	\$0.00
Street Value Drug Fine	\$3,155.91	\$821.01	\$503.91	\$546.94	\$0.00	\$1,284.05
TR/CR Conviction Pen	\$516.00	\$0.00	\$516.00	\$0.00	\$0.00	\$0.00
Traffic School Tuition	\$149.90	\$0.00	\$0.00	\$0.00	\$0.00	\$149.90
Traffic/Criminal Surcharge	\$28,807.74	\$575.67	\$28,231.16	\$0.00	\$0.00	\$0.91
Trauma Fund	\$5,338.23	\$135.54	\$5,198.88	\$0.00	\$0.00	\$3.81
Unsatisfied Judgment	\$4,780.15	\$4,780.15	\$0.00	\$0.00	\$0.00	\$0.00
Vehicle Fund	\$40.00	\$0.00	\$0.00	\$40.00	\$0.00	\$0.00
Victim's Fund	\$612.24	\$0.00	\$612.24	\$0.00	\$0.00	\$0.00
Victims Fund Fine	\$11,579.04	\$0.00	\$11,579.04	\$0.00	\$0.00	\$0.00
Work Release Fees	\$1,443.24	\$1,443.24	\$0.00	\$0.00	\$0.00	\$0.00
Totals:	\$798,738.95	\$282,374.48	\$120,227.31	\$181,457.20	\$208,135.73	\$6,544.23

RESOLUTION NO. _____

**A RESOLUTION AUTHORIZING THE ISSUANCE OF TAX
ANTICIPATION WARRANTS OF THE COUNTY OF CHAMPAIGN,
ILLINOIS, AND PROVIDING THE DETAILS OF SUCH WARRANTS,
AND RELATED MATTERS**

WHEREAS, the County Board (the **“Corporate Authorities”**) of The County of Champaign, Illinois (the **“Issuer”**), is a non-home rule unit under the provisions of Section 7 (Counties and Municipalities Other Than Home Rule Units) of Article VII (Local Government) of the Constitution of the State of Illinois, as supplemented and amended, including by the Counties Code, the Warrants and Jurors Certificates Act, the Registered Bond Act, the Bond Replacement Act, the Bond Authorization Act and the Local Government Debt Reform Act (collectively, the **“Act”**); and

WHEREAS, pursuant to a tax levy proceedings adopted November 18, 2010 (as supplemented, the **“Tax Levy Proceedings”**), to be filed in the Champaign County tax extension records, the Issuer levied taxes for the tax year 2010, to be extended, collected, billed and received in 2011 (to the extent not yet received by the Issuer, the **“Taxes”**); and

WHEREAS, it is imminent that there will be insufficient funds from time to time in the Issuer's general fund to pay general county operating expenses and liabilities; and

WHEREAS, pursuant to and in accordance with the Act and this resolution, the Issuer is authorized to issue its Tax Anticipation Warrants, and further designated Series 2010a, Series 2010b, etc., as the case may be, at one time or from time to time, up to the aggregate principal amount of \$856,415 (the **“Warrants”**) for the purpose of anticipating the receipt of one or more of the installments of Taxes, in order that the Issuer have operating funds and to pay costs of issuance of the Warrants; and

WHEREAS, pursuant to arrangements to be made from time to time on behalf of the Issuer, one or more banks or other financial institutions (including assigns and otherwise as specified in an Authenticating Order, as applicable, the **“Purchaser”**), are to purchase the Warrants; and

WHEREAS, for convenience of reference only this resolution is divided into numbered sections with headings, which shall not define or limit the provisions hereof, as follows:

	<u>Page</u>
Preambles	1
Section 1. Authority and Purpose	2
Section 2. Authorization and Terms of Warrants	2

Section 3.	Sale and Delivery	3
Section 4.	Execution and Authentication.....	4
Section 5.	Transfer, Exchange and Registration.....	4
Section 6.	Registrar and Paying Agent	5
Section 7.	Direct Obligations	6
Section 8.	Form of Warrants.....	6
Section 9.	Tax Covenant	11
Section 10.	Debt Service Fund.....	11
Section 11.	Proceeds Fund.....	11
Section 12.	Arbitrage Rebate	11
Section 13.	Investment Regulations.....	11
Section 14.	Non-Arbitrage and Tax-Exemption	12
Section 15.	Bank Qualified	16
Section 16.	Contract and Severability.....	16
Section 17.	Conflict and Repeal.....	16
Section 18.	Effective Date	16

**NOW, THEREFORE, BE IT RESOLVED BY THE COUNTY BOARD OF
THE COUNTY OF CHAMPAIGN, ILLINOIS, as follows:**

Section 1. Authority and Purpose. This resolution is adopted pursuant to the Act for the purpose of anticipating receipts of the Taxes for the payment of general operating expenses and liabilities and costs of issuance of the Warrants. Proceeds of the Warrants are hereby confirmed as appropriated for the same purposes to which the Taxes were to be applied.

Section 2. Authorization and Terms of Warrants. For the purposes described above in Section 1, there is hereby provided the sum of up to \$856,415, to be derived from proceeds of the Warrants. For the purpose of financing such appropriation, Warrants of the Issuer shall be issued and sold, at one time or from time to time, as funds in respect thereof are needed, in an aggregate principal amount of up to \$856,415, shall each be designated “**Tax Anticipation Warrant**”, and further designated “**Series 2010a**”, “**Series 2010b**”, etc., as the case may be, and shall be issuable in the denominations of \$500 each or any authorized integral multiple thereof. The Warrants shall be numbered consecutively from 1 upwards in order of their issuance and may bear such identifying numbers or letters as shall be useful to facilitate the registration, transfer and exchange of the Warrants. Unless otherwise determined in an order to authenticate the Warrants, not inconsistent herewith, each Warrant shall be dated as of the date of issuance thereof. The Warrants shall mature on a date within 60 days of the anticipated date of receipt of the applicable installment of nursing home Taxes, and in the aggregate principal amount of not to exceed \$856,415 and shall bear interest at the rate or rates percent per annum not to exceed 4.0%, as shall be specified in an applicable Authenticating Order.

Each Warrant shall bear interest from its dated date, computed on the basis of a 360-day year consisting of twelve 30-day months, and payable in lawful money of the United States of America at maturity, or earlier redemption, as the case may be, at the rate or rates per annum above set forth. The principal of and premium, if any, on the Warrants shall be payable

in lawful money of the United States of America upon presentation and surrender thereof at the designated financial institution (or officer of the Issuer, as the case may be) as Paying Agent for the Warrants (including its successors, the **"Paying Agent"**). Interest on the Warrants shall be payable on each interest payment date to the registered owners of record appearing on the registration books maintained by the designated financial institution (or officer of the Issuer, as the case may be) as Registrar on behalf of the Issuer for such purpose (including its successors, the **"Registrar"**), at the designated office of the Registrar as of the close of business on the fifth (5th) business day next preceding the payment date. Interest on the Warrants shall be paid by check or draft mailed to such registered owners at their addresses appearing on the registration books therefor. The Registrar shall not be required to transfer or exchange any Warrant during a period commencing the fifth (5th) day next preceding the payment date and ending on such payment date. With notice to the Registrar 15 days before the designated redemption date (or lesser notice acceptable to the Registrar), the Warrants shall be subject to redemption prior to maturity, from Taxes if, as and when received, at the times, in the manner, with the notice and with the effect set forth in the form of the Warrants in Section 8 below.

Although the Warrants are authorized to mature and to bear interest at the rate or rates per annum, as set forth above, and have such other terms as herein provided, and Warrants are nevertheless hereby authorized: to have a series designation, to have specified Purchasers, to mature in the specified principal amounts (not exceeding the aggregate the principal amount set forth above) and to bear interest at such other rate or rates, and have maturity or due dates, have paying agents and registrars or other fiscal agents, be subject to redemption and have such other terms and provisions as either (i) the County Board Chairman shall certify in an Authenticating Order at the time of delivery of the Warrants and payment therefor (with respect to which the term **"Authenticating Order"** shall mean, if at all and as executed and delivered, at one time or from time to time, one or more certificates as applicable to each series or to a particular draw or draws on the Warrants authorized under this resolution, signed by the County Board Chairman, and attested by the County Clerk and countersigned by the County Treasurer, under the Issuer's seal, setting forth and specifying details of the Warrants, including but not limited to series designation, payment dates, other than as set forth above, interest rate or rates (but not to exceed 5.0%), interest and principal payment dates, aggregate principal amount (but not to exceed the aggregate principal amount or the rate set forth above), the principal and interest coming due in any applicable payment period, the issuance of a Warrant instrument in installment form in lieu of serial form or in serial form in lieu of installment form, as the case may be, optional and mandatory prepayment and redemption provisions, designation of a Paying Agent and/or Registrar, designation of a Warrant Purchaser or Purchasers or credit facility, sale price, and investment restrictions, not otherwise inconsistent with this resolution, and full authority is hereby given to the County Board Chairman to certify and specify such terms, without any further action by the Corporate Authorities than this resolution), or (ii) the Corporate Authorities in supplemental proceedings shall approve, in either case other than as specifically set forth in this resolution. All signatures of the officers on Warrants may be manual or facsimile signatures.

Section 3. Sale and Delivery. All acts and things done by officers of the Issuer in connection with the sale of the Warrants shall be and they are hereby in all respects ratified, confirmed and approved. Sales of the Warrants to Purchasers, at one time or from time to time, shall be and are hereby authorized and approved.

The County Board Chairman, County Clerk, County Treasurer, Co-Administrators and other officials of the Issuer are hereby authorized and directed to do and perform, or cause to be done or performed, for or on behalf of the Issuer each and every thing necessary for the issuance of the Warrants, including the due and proper execution, delivery and performance of this resolution and all related and incidental agreements, certificates, receipts and opinions, upon payment of the full purchase price of the Warrants, an amount equal to not less than 98% of par, plus accrued interest, if any.

Section 4. Execution and Authentication. Each Warrant shall be executed in the name of the Issuer by the manual or authorized facsimile signature of its County Board Chairman and the corporate seal of the Issuer, or a facsimile thereof, shall be thereunto affixed or otherwise reproduced thereon, attested by the manual or authorized facsimile signature of its County Clerk, and countersigned by the County Treasurer.

In case any officer whose signature, or a facsimile of whose signature, shall appear on any Warrant shall cease to hold such office before the issuance of such Warrant, such Warrant shall nevertheless be valid and sufficient for all purposes, the same as if the person whose signature, or a facsimile thereof, appears on such Warrant had not ceased to hold such office. Any Warrant may be signed, sealed or attested on behalf of the Issuer by any person who, on the date of such act, shall hold the proper office, notwithstanding that at the date of such Warrant such person may not hold such office. No recourse shall be had for the payment of any Warrants against the County Board Chairman, the County Clerk, the County Treasurer or any member of the County Board or any officer or employee of the Issuer (past, present or future) who executes the Warrants, or on any other basis.

Each Warrant shall bear thereon a certificate of authentication executed manually by the Registrar. No Warrant shall be entitled to any right or benefit under this resolution or shall be valid or obligatory of any purpose until such certificate of authentication shall have been duly executed by the Registrar. Such certificate of authentication shall have been duly executed by the Registrar by manual signature, and such certificate of authentication upon any such Warrant shall be conclusive evidence that such Warrant has been authenticated and delivered under this resolution. The certificate of authentication on any Warrant shall be deemed to have been executed by the Registrar if signed by an authorized officer of the Registrar, but it shall not be necessary that the same officer sign the certificate of authentication on all of the Warrants issued hereunder.

Section 5. Transfer, Exchange and Registration. The Warrants shall be negotiable, subject to the provisions for registration of transfer contained herein. Each Warrant shall be transferable only upon the registration books maintained by the Registrar on behalf of the Issuer for that purpose at the designated office of the Registrar by the registered owner thereof in person or by such registered owner's attorney duly authorized in writing, upon surrender thereof together with a written instrument of transfer satisfactory to the Registrar and duly executed by the registered owner or such registered owner's duly authorized attorney. Upon the surrender for transfer of any such Warrant, the Issuer shall execute and the Registrar shall authenticate and deliver a new Warrant or Warrants registered in the name of the transferee, of

the same aggregate principal amount, maturity and interest rate as the surrendered Warrant. Warrants, upon surrender thereof at the principal office of the Registrar, with a written instrument satisfactory to the Registrar, duly executed by the registered owner or such registered owner's attorney duly authorized in writing, may be exchanged for an equal aggregate principal amount of Warrants of the same maturity and interest rate and of the denominations of \$500 each or any authorized integral multiple thereof, less previous retirements.

For every such exchange or registration of transfer of Warrants, the Issuer or the Registrar may make a charge sufficient to reimburse it for any tax, fee or other governmental charge required to be paid with respect to such exchange or transfer, which sum or sums shall be paid by the person requesting such exchange or transfer as a condition precedent to the exercise of the privilege of making such exchange or transfer. No other charge shall be made for the privilege of making such transfer or exchange. The provisions of the Bond Replacement Act shall govern the replacement of lost, destroyed or defaced Warrants.

The Issuer, the Registrar and the Paying Agent may deem and treat the person in whose name any Warrant shall be registered upon the registration books as the absolute owner of such Warrant, whether such Warrant shall be overdue or not, for the purpose of receiving payment of, or on account of, the principal of, premium, if any, or interest thereon and for all other purposes whatsoever, and all such payments so made to any such registered owner or upon such registered owner's order shall be valid and effectual to satisfy and discharge the liability upon such Warrant to the extent of the sum or sums so paid, and neither the Issuer nor the Registrar or the Paying Agent shall be affected by any notice to the contrary.

Section 6. Registrar and Paying Agent. The Issuer covenants that it shall at all times retain a Registrar and Paying Agent with respect to the Warrants and shall cause to be maintained at the office of the Registrar a place where Warrants may be presented for registration of transfer or exchange, that it will maintain at the designated office of the Paying Agent a place where Warrants may be presented for payment, that it shall require that the Registrar maintain proper registration books and that it shall require the Registrar and Paying Agent to perform the other duties and obligations imposed upon them by this resolution in a manner consistent with the standards, customs and practices concerning local government securities. The Issuer may enter into appropriate agreements with the Registrar and Paying Agent in connection with the foregoing, including as follows:

- (a) to act as Registrar, authenticating agent, Paying Agent and transfer agent as provided herein;
- (b) to maintain a list of registered owners of the Warrants as set forth herein and to furnish such list to the Issuer upon request, but otherwise to keep such list confidential;
- (c) to cancel and/or destroy Warrants which have been paid at maturity or submitted for exchange or transfer;
- (d) to furnish the Issuer a certificate with respect to Warrants cancelled and/or destroyed;

(e) to give notices of call for redemption; and

(f) to furnish the Issuer a confirmation statement of Warrants paid, Warrants outstanding and payments made with respect to interest on the Warrants.

In any event, (a) - (f) above shall apply to the Registrar and Paying Agent.

The Registrar and Paying Agent shall signify their acceptances of the duties and obligations imposed upon them by this resolution. The Registrar by executing the certificate of authentication on any Warrant shall be deemed to have certified to the Issuer that it has all requisite power to accept, and has accepted, including as Paying Agent in the case of Midland States Bank, as the case may be, such duties and obligations not only with respect to the Warrant so authenticated but with respect to all of the Warrants. The Registrar and Paying Agent are the agents of the Issuer for such purposes and shall not be liable in connection with the performance of their respective duties, except for their own negligence or default. The Registrar shall, however, be responsible for any representation in its certificate of authentication on the Warrants.

The Issuer may remove the Registrar or Paying Agent at any time. In case at any time the Registrar or Paying Agent shall resign or shall be removed or shall become incapable of acting, or shall be adjudged a bankrupt or insolvent, or if a receiver, liquidator or conservator of the Registrar, or of its property, shall be appointed, or if any public officer shall take charge or control of the Registrar or Paying Agent or of their respective properties or affairs, the Issuer covenants and agrees that it will thereupon appoint a successor Registrar or Paying Agent, as the case may be. The Issuer shall mail or cause to be mailed notice of any such appointment made by it to each registered owner of Warrants within ten (10) days after such appointment. Any Registrar or Paying Agent appointed under the provisions of this Section 6 shall be a bank, trust company, national banking association or other qualified professional with respect to such matters, maintaining a principal office in the State of Illinois.

Section 7. Direct Obligations. The Taxes and the full faith and credit of the Issuer are hereby irrevocably pledged to the punctual payment when due of the principal of and interest on the Warrants. The Warrants shall be direct obligations of the Issuer, provided that the Issuer shall not be obligated to separately levy ad valorem taxes (other than the Taxes) for the payment of the Warrants and the interest thereon.

Section 8. Form of Warrants. Subject to a Purchaser accepting typewritten Warrants, the Warrants shall be issued in fully registered form conforming to the industry customs and practices of printing, including part on the front and part on the reverse of the certificates, as appropriate, the blanks to be appropriately completed when the Warrants are delivered; and the Warrants shall be prepared in compliance with the National Standard Specifications for Fully Registered Municipal Securities prepared by the American National Standards Institute and, with appropriate insertions and modifications, shall be in substantially the form, as follows (The Warrants of each series shall be conformed to an applicable Authenticating Order.):

**UNITED STATES OF AMERICA
STATE OF ILLINOIS
THE COUNTY OF CHAMPAIGN
TAX ANTICIPATION WARRANT
SERIES 2010__**

REGISTERED NO. _____

REGISTERED \$ _____

INTEREST RATE:

MATURITY DATE:

DATED DATE:

Registered Owner:

Principal Amount:

KNOW ALL BY THESE PRESENTS that The County of Champaign, a unit of local government of the State of Illinois (the **"Issuer"**), acknowledges itself indebted and for value received hereby promises to pay to the Registered Owner identified above, or registered assigns, the Principal Amount set forth above on the Maturity Date specified above, and to pay interest on such Principal Amount from the Dated Date hereof, at the Interest Rate per annum set forth above, computed on the basis of a 360-day year consisting of twelve 30-day months and payable in lawful money of the United States of America at maturity or earlier redemption, as the case may be, and until the Principal Amount hereof shall have been paid, by check or draft mailed to the Registered Owner of record hereof as of the fifth (5th) business day next preceding such payment date, at the address of such Registered Owner appearing on the registration books maintained for such purpose by Midland States Bank, through its [principal corporate trust] office in Champaign, Illinois, as Registrar (including its successors, the **"Registrar"**). This Warrant, as to principal and premium, if any, when due, will be payable in lawful money of the United States of America upon presentation and surrender of this Warrant at Midland States Bank, through its [principal corporate trust] office in Champaign, Illinois, as Paying Agent (including its successors, the **"Paying Agent"**).

Pursuant to a duly enacted proceedings adopted November 18, 2010, the Issuer levied taxes for the nursing home for the tax levy year 2010, to be billed, extended, collected and received in 2010 (to the extent not yet received by the Issuer, the **"Taxes"**), the _____ installment of which Taxes are hereby pledged to the payment when due of the principal of and interest on the Warrants. In addition, pursuant to Section 14 of the Local Government Debt Reform Act, the full faith and credit of the Issuer, but excluding any separate and specific levy of general taxes therefor, are irrevocably pledged for the punctual payment when due of the principal of and interest on this Warrant according to its terms.

This Warrant is one of a series of Warrants (Series 2010__) issued in the aggregate principal amount of \$_____, which are all of like tenor, and which are authorized and issued under and pursuant to the Constitution and laws of the State of Illinois and pursuant to and in accordance with an authorizing resolution adopted by the County Board of the Issuer on _____, 2010, and entitled: "A Resolution Authorizing the Issuance of Tax Anticipation Warrants of The County of Champaign, Illinois, and Providing the Details of Such Warrants, and

Related Matters.” The Warrants are issued under the Constitution and laws of the State of Illinois, including the Warrants and Jurors Certificates Act and Section 14 of the Local Government Debt Reform Act, to anticipate the Taxes not yet received by the Issuer to assure that the Issuer will have funds to pay operating expenses and liabilities.

The Warrants are subject to redemption prior to maturity at the option of the Issuer as a whole or in part at any time (with notice as herein provided) in integral multiples of \$500 (to be selected by the Registrar in such manner as it shall deem fair and appropriate in the case of partial redemption of the Warrants) at a redemption price equal to the principal amount to be so redeemed plus accrued interest to the redemption date.

In the event of the redemption of less than all the Warrants, the aggregate principal amount thereof to be redeemed shall be \$500 each or an integral multiple thereof, and the Registrar shall assign to each Warrant of such maturity a distinctive number for each \$500 principal amount of the Warrants and shall select by lot from the numbers so assigned as many numbers as, at \$500 for each number, shall equal the principal amount of such Warrants to be redeemed. The Warrants or parts thereof to be redeemed shall be those to which were assigned numbers so selected; provided that only so much of the principal amount of each Warrant shall be redeemed as shall equal \$500 for each number assigned to it and so selected.

Notice of the redemption of Warrants will be mailed not less than five (5) business days prior to the date fixed for such redemption to the registered owners of Warrants to be redeemed at their last addresses appearing on the registration books therefor. The Registered Owner of this Warrant may waive such notice, presentment for payment and payment thereof being conclusive of such a waiver. The Warrants or portions thereof specified in such notice shall become due and payable at the applicable redemption price on the redemption date therein designated, and if, on the redemption date, moneys for payment of the redemption price of all the Warrants or portions thereof to be redeemed, together with interest to the redemption date, shall be available for such payment on such redemption date, and if notice of redemption shall have been mailed as herein set forth (and notwithstanding any defect therein or the lack of actual receipt thereof by any registered owner), then from and after the redemption date interest on such Warrants or portions thereof shall cease to accrue and become payable. All notices of redemption shall state the redemption date, the redemption price, if less than all outstanding Warrants are to be redeemed, the identification (and, in the case of partial redemption, the respective principal amounts in integral multiples of \$500) of the Warrants to be redeemed, that on the redemption date the redemption price will become due and payable upon each such Warrant or portion thereof called for redemption and, upon the deposit of funds therefor with the Paying Agent, that interest thereon shall cease to accrue from and after such redemption date, and the place where such Warrants are to be surrendered for payment of the redemption price, which place of payment shall be the principal [corporate trust] office of the Paying Agent in Champaign, Illinois.

This Warrant is transferable only upon the registration books therefor by the Registered Owner hereof in person, or by such Registered Owner's attorney duly authorized in writing, upon surrender hereof at the office of the Registrar in Champaign, Illinois, together with a written instrument of transfer satisfactory to the Registrar duly executed by the Registered

Owner or by such Registered Owner's duly authorized attorney, and thereupon a new registered Warrant or Warrants, in the authorized denominations of \$500 or any authorized integral multiple thereof and of the same aggregate principal amount as this Warrant, shall be issued to the transferee in exchange therefor. In like manner, this Warrant may be exchanged for an equal aggregate principal amount of Warrants of any authorized denomination. The Registrar shall not be required to exchange or transfer any Warrant during the period from the fifth (5th) business day preceding the payment date to such payment date. The Issuer or the Registrar may make a charge sufficient to reimburse it for any tax, fee or other governmental charge required to be paid with respect to the transfer or exchange of this Warrant. No other charge shall be made for the privilege of making such transfer or exchange. The Issuer, the Registrar and the Paying Agent may treat and consider the person in whose name this Warrant is registered as the absolute owner hereof for the purpose of receiving payment of, or on account of, the principal, premium, if any, and interest due hereon and for all other purposes whatsoever, and all such payments so made to such Registered Owner or upon such Registered Owner's order shall be valid and effectual to satisfy and discharge the liability upon this Warrant to the extent of the sum or sums so paid, and neither the Issuer nor the Registrar or the Paying Agent shall be affected by any notice to the contrary.

No recourse shall be had for the payment of any Warrants against the County Board Chairman, the County Clerk, the County Treasurer, any member of the County Board or any other officer or employee of the Issuer (past, present or future) who executes any Warrants, or on any other basis.

The Issuer may remove the Registrar or Paying Agent at any time and for any reason and appoint a successor.

This Warrant shall not be valid or become obligatory for any purpose until the certificate of authentication hereon shall have been duly executed by the Registrar.

[The Issuer has designated the Warrants as **“qualified tax-exempt obligations”** under Section 265(b)(3) of the Internal Revenue Code of 1986, as amended.]

It is hereby certified, recited and declared that all acts, conditions and things required to be done, exist and be performed precedent to and in the issuance of this Warrant in order to make it a legal, valid and binding obligation of the Issuer have been done, exist and have been performed in regular and due time, form and manner as required by law, and that the series of Warrants of which this Warrant is one, together with all other indebtedness of the Issuer, is within every debt or other limit prescribed by law.

IN WITNESS WHEREOF, The County of Champaign, Illinois, by its County Board has caused this Warrant to be executed in its name and on its behalf by the manual or facsimile signature of its County Board Chairman, and its corporate seal, or a facsimile thereof, to be hereunto affixed or otherwise reproduced hereon, attested by the manual or facsimile signature of its County Clerk, and countersigned by the manual or facsimile signature of its County Treasurer, all as of the Dated Date set forth above.

**THE COUNTY OF CHAMPAIGN,
ILLINOIS**

(SEAL)

Attest:

County Board Chairman

County Clerk

Counter Signed:

County Treasurer

CERTIFICATE OF AUTHENTICATION

Dated: _____

This is one of the Tax Anticipation Warrants, Series 2010_, described in the within mentioned resolution.

MIDLAND STATES BANK,
Champaign, Illinois, as Registrar

By _____
Authorized Signer

**Registrar and
Paying Agent:** Midland States Bank
Champaign, Illinois

ASSIGNMENT

For value received the undersigned sells, assigns and transfers unto _____ [Name,

Address and Social Security Number or FEIN of Assignee]
the within Warrant and hereby irrevocably constitutes and appoints _____

attorney to transfer the within Warrant on the books kept
for registration thereof, with full power of substitution in the premises.

Dated _____

Signature

Signature Guarantee:

Notice: The signature on this assignment must correspond with the name of the Registered Owner as it appears upon the face of the within Warrant in every particular, without alteration or enlargement or any change whatever.

Section 9. Tax Covenant. The Issuer covenants and agrees with the registered owners of the Warrants that so long as any of the Warrants remain outstanding, and unless and to the extent funds are then on deposit in the Debt Service Fund, established or continued in Section 10 below, the Issuer will take no action or fail to take any action which in any way would adversely affect the ability of the Issuer to levy, collect, receive and apply the Taxes as contemplated by this resolution, and the Issuer and its officers will comply with all present and future applicable laws in order to assure that the Taxes have been, will be and are levied, extended, billed, collected and received as provided herein and credited to or deposited in the Debt Service Fund, established or continued in Section 10 below, to pay the principal of and interest on the Warrants.

Section 10. Debt Service Fund. Moneys derived from the Taxes, and any other available sources, are appropriated and set aside for the sole purpose of paying principal of and interest on the Warrants when and as the same come due. All of such moneys, and all other moneys to be used for the payment of the principal of and interest on the Warrants, shall be deposited in the “**Debt Service Fund of 2010**” (the “**Debt Service Fund**”), with a separate account for each series, which shall be administered as a bona fide debt service fund under the Internal Revenue Code of 1986, as amended.

Section 11. Proceeds Fund. All of the proceeds of the sale of the Warrants shall be deposited in the “**Proceeds Fund of 2010**” (the “**Proceeds Fund**”), with a separate account for each series, as a special fund of the Issuer. Moneys in the Proceeds Fund shall be used for the purposes specified in Section 1 of this resolution, including for the payment of costs of issuance of the Warrants, but may thereafter be reappropriated and used for other lawful purposes of the Issuer. Before any such reappropriation shall be made, there shall be filed with the County Clerk an opinion of nationally recognized bond counsel (“**Bond Counsel**”) to the effect that such reappropriation will not adversely affect the tax-exempt status of the Warrants under Section 103 of the Internal Revenue Code of 1986, as amended.

Section 12. Arbitrage Rebate. The Issuer does not reasonably expect to issue more than \$5,000,000 of tax-exempt obligations in the calendar year of the issuance of the Warrants within the meaning of the small issuer exception under Section 148(f)(4)(D) of the Internal Revenue Code of 1986, as amended. However, if exceeded, the Issuer will comply with such Section 148(f). The Issuer shall comply with the provisions of Section 148(f) of the Internal Revenue Code of 1986, as amended, relating to the rebate of certain investment earnings at periodic intervals to the United States of America to the extent that such compliance is necessary to preserve the exclusion from gross income for federal income tax purposes of interest on the Warrants under Section 103 of the Internal Revenue Code of 1986, as amended.

Section 13. Investment Regulations. No investment shall be made of any moneys in the Debt Service Fund or the Proceeds Fund except in accordance with the tax covenants and other covenants set forth in Section 14 of this resolution. All income derived from such investments in respect of moneys or securities in any fund or account shall be credited in each case to the fund or account in which such moneys or securities are held.

Any moneys in any fund or account that are subject to investment yield restrictions may be invested in United States Treasury Securities, State and Local Government Series, pursuant to the regulations of the United States Treasury Department, Bureau of Public Debt. The Issuer's County Treasurer and agents designated by such officer are hereby authorized to submit, on behalf of the Issuer, subscriptions for such United States Treasury Securities and to request redemption of such United States Treasury Securities.

Section 14. Non-Arbitrage and Tax-Exemption. One purpose of this Section 14 is to set forth various facts regarding the Warrants and to establish the expectations of the Corporate Authorities and the Issuer as to future events regarding the Warrants and the use of proceeds of the Warrants. The certifications and representations made herein and at the time of the issuance of the Warrants are intended, and may be relied upon, as certifications and expectations described in the Income Tax Regulations dealing with arbitrage and rebate (the "**Regulations**"). The covenants and agreements contained herein, and at the time of the issuance of the Warrants, are made for the benefit of the registered owners from time to time of the Warrants. The Corporate Authorities and the Issuer agree, certify, covenant and represent as follows:

(1) The Warrants to be issued in anticipation of receipt of the specified installment of Taxes to pay municipal operational costs and liabilities and issuance costs as described in Section 1 above, and all of the amounts received upon the sale of the Warrants, plus all investment earnings thereon (the "**Proceeds**") are needed for the purpose for which the Warrants are being issued.

(2) The Issuer expects to apply proceeds of the Warrants to the costs in (1) above within three (3) months of the issuance of the Warrants.

(3) The Issuer has on hand no funds which could legally and practically be used for the purposes hereof which are not pledged, budgeted, earmarked or otherwise necessary to be used for other purposes. Accordingly, no portion of the Proceeds will be used (i) directly or indirectly to replace funds of the Issuer or any agency, department or division thereof that could be used for such purposes, or (ii) to replace any proceeds of any prior issuance of obligations by the Issuer. No portion of the Warrants is being issued solely for the purpose of investing the Proceeds at a Yield higher than the Yield on the Warrants. For purposes of this Section 14, "**Yield**" means that yield (that is, the discount rate) which when used in computing the present worth of all payments of principal and interest to be paid on an obligation (using semi-annual compounding on the basis of a 360-day year) produces an amount equal to its issue price, including accrued interest, and the purchase price of the Warrants is equal to the first offering price at which more than 10% of the principal amount of the Warrants is sold to the public (excluding bond houses, brokers or similar persons or organizations acting in the capacity of underwriters or wholesalers).

(4) All principal proceeds of the Warrants will be deposited in the Proceeds Fund for the purposes described in Section 1 above, and any accrued interest and premium received on the delivery of the Warrants, if any, will be deposited in the Debt Service

Fund and used to pay the first interest due on the Warrants. Earnings on investment of moneys in any fund or account will be credited to that fund or account. Costs for the purposes described in Section 1 above, including issuance costs of the Warrants, will be paid from the Proceeds Fund, and no other moneys are expected to be deposited therein. Interest on and principal of the Warrants will be paid from the Debt Service Fund. No Proceeds will be used more than 30 days after the date of issue of the Warrants for the purpose of paying any principal or interest on any issue of bonds, notes, certificates or warrants or on any installment contract or other obligation of the Issuer or for the purpose of replacing any funds of the Issuer used for such purpose.

(5) The Debt Service Fund is established to achieve a proper matching of revenues and earnings with debt service requirements. Other than any amounts held to pay principal of matured Warrants that have not been presented for payment, it is expected that any moneys deposited in the Debt Service Fund will be spent within the 12-month period beginning on the date of deposit therein. Any earnings from the investment of amounts in the Debt Service Fund will be spent within a one-year period beginning on the date of receipt of such investment earnings. Other than any amounts held to pay principal of matured Warrants that have not been presented for payment, it is expected that the Debt Service Fund will be depleted on or before the maturity date of the Warrants.

(6) Other than deposits of Taxes into the Debt Service Fund, no funds or accounts have been or are expected to be established, and no moneys or property have been or are expected to be pledged (no matter where held or the source thereof) which will be available to pay, directly or indirectly, the Warrants or restricted so as to give reasonable assurance of their availability for such purposes. No property of any kind is pledged to secure, or is available to pay, obligations of the Issuer to any credit enhancer or liquidity provider.

(7) (a) All amounts on deposit in the Proceeds Fund or the Debt Service Fund and all Proceeds, no matter in what funds or accounts deposited ("**Gross Proceeds**"), to the extent not exempted in (b) below, and all amounts in any fund or account pledged directly or indirectly to the payment of the Warrants which will be available to pay, directly or indirectly, the Warrants or restricted so as to give reasonable assurance of their availability for such purpose contrary to the expectations set forth in (6) above, shall be invested at market prices and at a Yield not in excess of the Yield on the Warrants.

(b) The following may be invested without Yield restriction:

(i) amounts invested in obligations described in Section 103(a) of the Internal Revenue Code of 1986, as amended (but not specified private activity bonds as defined in Section 57(a)(5)(C) of the Code), the interest on which is not includable in the gross income of any registered owner thereof for federal income tax purposes ("**Tax-Exempt Obligations**");

(ii) amounts deposited in the Debt Service Fund that are reasonably expected to be expended within 6 months from the deposit date and are to have not been on deposit therein for more than 6 months; and

(iii) all amounts for the first 30 days after they become Gross Proceeds (in general the date of deposit in any fund or account securing the Warrants); and

(8) Subject to (17) below, once moneys are subject to the Yield limits of (7)(a) above, such moneys remain Yield restricted until they cease to be Gross Proceeds.

(9) As set forth in Section 148(f)(4)(D) of the Internal Revenue Code of 1986, as amended, the Issuer is excepted from the required rebate of arbitrage profits on the Warrants because the Issuer is a governmental unit with general taxing powers, none of the Warrants is a “**private activity bond**” as defined in Section 141(a) of the Internal Revenue Code of 1986, as amended, all the net proceeds of the Warrants are to be used for the local government activities of the Issuer, and the aggregate face amount of all Tax-Exempt Obligations (other than “**private activity bonds**” as defined in Internal Revenue Code of 1986, as amended) issued by the Issuer and all subordinate entities thereof during the calendar year of issuance of Warrants, including the Warrants, is not reasonably expected to exceed \$5,000,000 under such Section 148(f)(4)(D). If such amount is exceeded, the Issuer will consult Bond Counsel concerning rebate obligations under Section 148 of the Code.

(10) None of the Proceeds will be used, directly or indirectly, to replace funds which were used in any business carried on by any person other than a state or local governmental unit.

(11) The payment of the principal of or the interest on the Warrants will not be, directly or indirectly (A) secured by any interest in (i) property used or to be used for a private business activity by any person other than a state or local governmental unit, or (ii) payments in respect of such property, or (B) derived from payments (whether or not by or to the Issuer), in respect of property, or borrowed money, used or to be used for a private business activity by any person other than a state or local governmental unit.

(12) The Issuer reasonably expects to achieve a cumulative tax flow deficit equal to not less than 90% of the Proceeds of the Warrants before the maturity date of the Warrants drawn upon. The Issuer is now experiencing, or imminently expects to experience, a cumulative tax flow deficit equal to not less than 90% of the Proceeds of the Warrants. None of the Proceeds will be used, directly or indirectly, to make or finance loans to persons other than a state or local governmental unit.

(13) No user of facilities in respect of the Warrants other than a state or local government unit will use such facilities on any basis other than the same basis as the general public, and no person other than a state or local governmental unit will be a user of such facilities as a result of (i) ownership, or (ii) actual or beneficial use pursuant to a

lease or a management or incentive payment contract, or (iii) any other similar arrangement.

(14) Beginning on the 15th day prior to the sale of the Warrants, the Issuer will not have sold or delivered, and will not sell or deliver (nor will it deliver within 15 days after the date of issue of the Warrants), any other obligations pursuant to a common plan of financing, which will be paid out of substantially the same source of funds (or which will have substantially the same claim to be paid out of substantially the same source of funds) as the Warrants or will be paid directly or indirectly from Proceeds.

(15) No portion of facilities in respect of the Warrants is expected to be sold or otherwise disposed of prior to the last maturity of the Warrants.

(16) The Issuer has not been notified of any disqualification or proposed disqualification of it by the Internal Revenue Service as a bond issuer which may certify bond issues under the Regulations.

(17) The Yield restrictions contained in (7) above or any other restriction or covenant contained herein may be violated or changed if the Issuer receives an opinion of Bond Counsel to the effect that such violation or change will not adversely affect the tax-exempt status of interest on the Warrants to which it is otherwise entitled.

(18) The Issuer acknowledges that any changes in facts or expectations from those set forth herein may result in different Yield restrictions or rebate requirements from those set forth herein and that Bond Counsel should be contacted if such changes do occur.

(19) The Corporate Authorities have no reason to believe the facts, estimates, circumstances and expectations set forth herein are untrue or incomplete in any material respect. On the basis of such facts, estimates, circumstances and expectations, it is not expected that the Proceeds or any other moneys or property will be used in a manner that will cause the Warrants to be arbitrage bonds within the meaning of Section 148 of the Internal Revenue Code of 1986, as amended, and of the Regulations. To the best of the knowledge and belief of the Corporate Authorities, such expectations are reasonable, and there are no other facts, estimates and circumstances that would materially change such expectations.

The Issuer also agrees and covenants with the registered owners of the Warrants from time to time outstanding that, to the extent possible under Illinois law, it will comply with whatever federal tax law is adopted in the future which applies to the Warrants and affects the tax-exempt status of the Warrants.

The Corporate Authorities hereby authorize the officials of the Issuer responsible for issuing the Warrants, the same being the County Board Chairman, County Clerk, the County Treasurer and the Co-Administrators of the Issuer, to make such further covenants and certifications as may be necessary to assure that the use thereof will not cause the Warrants to be

arbitrage bonds and to assure that the interest in the Warrants will be excluded from gross income for federal income tax purposes. In connection therewith, the Issuer and the Corporate Authorities further agree: (a) through the officers of the Issuer, to make such further specific covenants, representations as shall be truthful, and assurances as may be necessary or advisable; (b) to consult with Bond Counsel approving the Warrants and to comply with such advice as may be given; (c) to pay to the United States, as necessary, such sums of money representing required rebates of excess arbitrage profits relating to the Warrants; (d) to file such forms, statements, and supporting documents as may be required and in a timely manner; and (e) if deemed necessary or advisable, to employ and pay fiscal agents, financial advisors, attorneys, and other persons to assist the Issuer in such compliance.

Section 15. Bank Qualified. Pursuant to Section 265(b)(3) of the Internal Revenue Code of 1986, as amended, the Issuer hereby designates the Warrants as “**qualified tax-exempt obligations**” as defined in such Section 265(b)(3). The Issuer represents that the reasonably anticipated amount of tax-exempt obligations that will be issued by the Issuer and all subordinate entities of the Issuer during the calendar year in which the Warrants are issued will not exceed \$10,000,000 (\$30,000,000 in 2010) within the meaning of Section 265(b)(3) of the Internal Revenue Code of 1986, as amended. The Issuer covenants that it will not so designate and issue more than \$10,000,000 (\$30,000,000 in 2010) aggregate principal amount of tax-exempt obligations in such calendar year. For purposes of this Section 15, the term “**tax-exempt obligations**” includes “**qualified 501(c)(3) Bonds**” (as defined in the Section 145 of the Internal Revenue Code of 1986, as amended) but does not include other “**private activity bonds**” (as defined in Section 141 of the Internal Revenue Code of 1986, as amended).

Section 16. Contract and Severability. The provisions of this resolution shall constitute a contract between the Issuer and the owners of the Warrants. Any pledge made in this resolution and the provisions, covenants and agreements herein set forth to be performed by or on behalf of the Issuer shall be for the equal benefit, protection and security of the owners of any and all of the Warrants. All of the Warrants, regardless of the time or times of their issuance, shall be of equal rank without preference, priority or distinction of any of the Warrants over any other thereof except as expressly provided in or pursuant to this resolution. This resolution and the Act shall constitute full authority for the issuance of the Warrants, and to the extent that the provisions of this resolution conflict with the provisions of any other ordinance or resolution of the Issuer, the provisions of this resolution shall control. If any section, paragraph or provision of this resolution shall be held to be invalid or unenforceable for any reason, the invalidity or unenforceability of such section, paragraph or provision shall not affect any of the remaining provisions of this resolution.

Section 17. Conflict and Repeal. All ordinances, resolutions or parts thereof in conflict herewith be and the same are hereby repealed to the extent of such conflict, and this resolution shall be in full force and effect forthwith upon its adoption.

Section 18. Effective Date. This resolution shall become effective after its adoption as required by applicable law.

Upon motion by County Board Member _____,
seconded by County Board Member _____, adopted this 18th day of
November, 2010, by roll call vote, as follows:

Ayes (names): _____

Nays (names): _____

Absent (names): _____

APPROVED: November 18, 2010

(SEAL)

Attest:

County Clerk, as *ex officio* Clerk to
the County Board

County Board Chairman

STATE OF ILLINOIS)
) SS.
THE COUNTY OF CHAMPAIGN)

CERTIFICATION OF RESOLUTION

I, the undersigned, do hereby certify that I am the duly qualified and acting County Clerk of The County of Champaign, Illinois (the “**Municipality**”), and that as such official I am the keeper of the records and files of the County and the County Board (the “**Corporate Authorities**”).

I do further certify that the foregoing is a full, true and complete excerpt from the proceedings of the meeting of the Corporate Authorities held on the 18th day of November, 2010, insofar as the same relates to the adoption of a resolution numbered and entitled:

RESOLUTION NO. _____

**A RESOLUTION AUTHORIZING THE ISSUANCE OF TAX
ANTICIPATION WARRANTS OF THE COUNTY OF
CHAMPAIGN, ILLINOIS, AND PROVIDING THE
DETAILS OF SUCH WARRANTS, AND RELATED
MATTERS,**

a true, correct and complete copy of which resolution as adopted at such meeting appears in the foregoing transcript of the minutes of such meeting.

I do further certify that the deliberations of the Corporate Authorities on the adoption of such resolution were conducted openly, that the vote on the adoption of such resolution was taken openly and was preceded by a public recital of the matter being considered and such other information as would inform the public of the business being conducted, that such meeting was held at a specified time and place convenient to the public, that the meeting agenda was duly posted at the County Courthouse and the Brookens Administrative Center at least 48 hours before the meeting, that notice of such meeting was duly given to all of the news media requesting such notice, that such meeting was called and held in strict compliance with the provisions of the open meetings laws of the State of Illinois, as amended, and with the provisions of the Counties Code of the State of Illinois, as amended, and that the Corporate Authorities have complied with all of the procedural rules of the Corporate Authorities.

IN WITNESS WHEREOF, I hereunto affix my official signature, this _____ day of December, 2010.

(SEAL)

County Clerk

FOR COUNTY BOARD APPROVAL

11/18/10

PURCHASES NOT FOLLOWING THE PURCHASING POLICY, AND EMERGENCY PURCHASES

DEPARTMENT	APPROPRIATION #	VR#/PO#	VR/PO DATE	DESCRIPTION	VENDOR	AMOUNT
CREDIT CARD CHARGES PAID WITHOUT RECEIPT						
** Correctional Center	080-140-522.02	VR#140-539	10/28/10	Scnucks purchase 9/23	Visa Cardmember Service	\$ 18.95

*****According to Illinois Attorney General and Champaign County State's Attorney,
the Purchasing Policy does not apply to the office of elected officials.*****

** Paid- For Information Only

RESOLUTION No. _____

**RESOLUTION ESTABLISHING GUIDELINES FOR THE CHAMPAIGN COUNTY
2011 APPORTIONMENT PLAN**

WHEREAS, the Champaign County Board recognizes that Champaign County has a population of less than 3,000,000 inhabitants and operates under the township form of government, and is thereby required pursuant to 55 ILCS 5/2-3002 to determine, at the time of reapportionment every ten years, the size of the county board to be elected, and to determine whether board members shall be elected from single-member districts, multi-member districts, or at-large by ordinance of the county board; and

WHEREAS, the Champaign County Board has determined, pursuant to 55 ILCS 5/2-3002(a) that the apportionment plan for Champaign County to be adopted in 2011 designates the size of the county board to be elected shall be 22 members; and

WHEREAS, the Champaign County Board has determined pursuant to 55 ILCS 5/2-3002(a) that the apportionment plan for Champaign County to be adopted in 2011 designates that county board members shall be elected by 11 county board districts with 2 members elected from each district; and

WHEREAS, the Champaign County Board has determined pursuant to 55 ILCS 5/2-3002(a) that the chairman of the county board shall continue to be elected by the members of the county board from its membership; and

WHEREAS, the Champaign County Board has placed an Advisory referenda before the voters of Champaign County pursuant to 55 ICLS 5/23002(b) on questions concerning (i) the number of members of the county board to be elected in 2012 to be 22 members; and (ii) the board members to be elected from eleven multi-member districts, and said advisory referenda was approved by the voters of Champaign County on November 2, 2010 with a vote of 74% in support and 26% in opposition; and

WHEREAS, the Champaign County Board recognizes its responsibility to develop an apportionment plan to specify the number of districts and the number of county board members to be elected from each district as defined under 55 ILCS 5/2-3003, and pursuant to Resolution No. 7307 has established a Champaign County Redistricting Commission for Election Redistricting based on the 2010 United States Census; and

WHEREAS, pursuant to Resolution No. 7307, the Champaign County Board has directed that the Champaign County Redistricting commission for Election Redistricting based on the 2010 United States Census present its First Reapportionment Plan Map on or before April 1, 2011;

NOW, THEREFORE, BE IT RESOLVED by the County Board of Champaign County that the following guidelines are established in development of an apportionment plan to be adopted by the County Board in 2011:

Section 1: That the County Board to be elected under this apportionment plan consist of 22 members which number does not exceed the size of the County Board on October 2, 1969;

Section 2: That Champaign County be divided into 11 county board districts to be numbered from 1 through 11, and that there be 2 county board members elected from each district;

Section 3: That in the development of the apportionment plan, it is documented that the county board chair shall continue to be elected by the members of the county board from its membership; and

Section 4: That the Champaign County Redistricting Commission shall adhere to 55 ILCS 5/2-3003 and to the guidelines established in Resolution No. 7307 in the designation of the 11 districts identified in the apportionment plan; and

Section 5: That the Champaign County Redistricting Commission is further directed by the County Board to utilize the services of a professional GIS mapping consultant or agency to prepare any and all maps it will submit to the County Board for ultimate consideration.

PRESENTED, PASSED, APPROVED and RECORDED this 21st day of December, A.D. 2010.

ATTEST:

C. Pius Weibel, Chair
Champaign County Board

Mark Shelden, County Clerk and
Ex-officio Clerk of the County Board

RESOLUTION NO. 6336

**RESOLUTION REGARDING A PROPOSED CHEMICAL WASTE LANDFILL OVER
THE MAHOMET AQUIFER IN DEWITT COUNTY ILLINOIS**

WHEREAS, the Mahomet Aquifer is the source of water for most Champaign County residents and businesses; and

WHEREAS, the availability of adequate groundwater for the use of Champaign County residents and businesses including that provided by the Mahomet Aquifer is critical to the continued prosperity and growth of Champaign County; and

WHEREAS, alternative water sources to the Mahomet Aquifer for most Champaign County residents and businesses are not readily available without significant investment and possible adverse environmental considerations; and

WHEREAS, Clinton Landfill, Inc. of Clinton, Illinois, through its parent company Peoria Disposal Company of Peoria, Illinois, as well as its affiliated companies have applied to the United States Environmental Protection Agency for a permit to establish a Chemical Waste Landfill as a portion of the site known as the Clinton Landfill 3, located just south of Clinton, Illinois; and

WHEREAS, said site of the proposed Chemical Waste Landfill at the Clinton Landfill 3 is located immediately over a portion of the Mahomet Aquifer; and

WHEREAS, if permitted by the United States Environmental Protection Agency, the proposed Chemical Waste Landfill at the Clinton Landfill 3 would accept and bury Polychlorinated Biphenyl (PCB) solid waste; and

WHEREAS, such PCB materials are considered toxic chemical waste under the laws of the United States and are suspected to be carcinogenic and are linked to numerous health issues including cancer and non-cancer effects on the endocrine, reproductive and immune systems; and

WHEREAS, the proposed design of the Chemical Waste Landfill at the Clinton Landfill 3 cannot guarantee containment of the toxic materials forever or for a length of time consistent with Champaign County being a viable location for its present and future residents and businesses; and

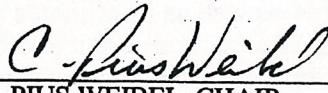
WHEREAS, any contamination of the Mahomet Aquifer by PCBs from the proposed Chemical Waste Landfill at the Clinton Landfill 3 can be expected to have deleterious effects on the quantity of water available from the Mahomet Aquifer for use by most Champaign County residents and businesses; and

WHEREAS, if the landfill owners become insolvent, they will no longer be financially responsible for the maintenance and oversight of the hazardous landfill, and instead that responsibility will fall upon the federal or state government to fulfill, creating a larger tax burden for many citizens, including the taxpayers of Champaign County.

NOW, THEREFORE, BE IT RESOLVED by the Champaign County Board, Champaign County, Illinois, as follows:


1. The County Board of Champaign County, Illinois opposes the permitting by the United States Environmental Protection Agency of the proposed Chemical Waste Landfill as a portion of the site known as the Clinton Landfill 3 to be located just south of Clinton, Illinois; and
2. The Champaign County Clerk is hereby authorized to provide a copy of this Resolution to the USEPA Region 5 Administrator Mary Gade, 77 West Jackson Boulevard, Chicago IL 60604, and refer to the application submitted by Clinton Landfill Inc. and directed to Margaret Guerriero, Director of Land and Chemicals Division.

PRESENTED, ADOPTED, APPROVED, AND RECORDED this 24th day of January, 2008.



C. PIUS WEIBEL, CHAIR
CHAMPAIGN COUNTY BOARD

ATTEST:



MARK SHELDEN, COUNTY
CLERK and *ex officio* CLERK
OF THE CHAMPAIGN COUNTY BOARD



ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

July 22, 2010

Mr. Rafael P. Gonzalez
EPA Community Involvement Coordinator
EPA Region 5
Land and Chemical Division
Mail Code L-8J
77 W. Jackson Blvd
Chicago, Illinois 60604-3590

Mr. Steve Johnson
EPA Geologist
EPA Region 5
Land and Chemical Division
Mail Code L-8J
77 W. Jackson Blvd
Chicago, Illinois 60604-3590

Re: Clinton Landfill #3
TSCA Permit Application

KPRG Project No: 10110

Dear Mssrs. Gonzalez and Johnson

KPRG and Associates, Inc., has reviewed the permit application submitted by Clinton Landfill, Inc. of Peoria, Illinois. KPRG was retained by the Mahomet Valley Water Authority ("MVWA") a public water authority created by Illinois Law. We are concerned that the proposed hazardous waste landfill may pose a threat to the Mahomet Aquifer – the main source of drinkable water for the Mahomet Valley. Our hope and intention is to assist you in your evaluation of this permit application.

Executive Summary

The application for Clinton Landfill Number 3 gained IEPA approval based on simulations created by a program that is very limited in its capabilities. The simulations, and data and analysis provided to the USEPA, largely ignored these limitations except to the extent the limitations were exploited for the benefit of the applicant. Most notable of these failures is the lack of calibration, absence of fundamental hydrogeologic data, and lack of evaluation of lateral migration.

Additionally, site specific, reasonable and meaningful hydrogeologic data is lacking. The perceived hydrogeology is just that – perceived. The evaluation assumes much but is based on little more than inapplicable speculation. What is necessary is a more detailed review in light of known geologic and

hydrogeologic systems at the site. This accurate understanding must then be applied to a three-dimensional groundwater model. The evaluation of the model must be expanded both in terms of time and distance. Failure to perform this most basic evaluation will result in a failure to identify potential threats to human health and the environment.

Introduction

KPRG's project team performed a technical review of the geologic and hydrogeologic portions of applications filed for the Clinton Landfill No. 3 expansion in DeWitt County, Illinois. This review focused on the application for a chemical waste disposal facility within the footprint and airspace of the proposed expansion of the Landfill No. 3 facility. Our review has identified several issues that should be of concern to, and be considered by, the United States Environmental Protection Agency (USEPA) in reviewing the pending application. The following sections describe the proposed site and landfill characteristics, and detail concerns identified in our review.

Site Geology

The important geologic units beneath Clinton Landfill No. 3 are the layers of glacial (ice age) sediments that lie between the land surface and the bedrock beneath those sediments. These sediments were deposited by multiple advances of glaciers. These sediments are of different ages, different origins, different soil types, different thicknesses, different properties, and different levels of modification and weathering.

The glacial sediments are important to the pending permit application for multiple reasons. First they are the foundation upon which the landfill is built. They form the sediments against which the buried portions of the side-walls of the landfill presently lie. The glacial sediments also provide the pathways for migration of landfill contaminants away from the landfill in gaseous and/or liquid form. They contain the water resources that are used by individual households and by public water supplies to meet personal, agricultural and industrial needs (Shaw 2005, Appendix E.3 and Shaw 2009, Attachment 1). They provide the storage capacity and migration pathways that allow precipitation to renew water resources. The glacial sediments provide a limited capacity to mitigate and absorb damage induced by human activities at or near the surface.

At this site, the glacial sediments at the ground surface are young sediments associated with the Wisconsinan glacial that ended about 12,000 years ago. The landfill location is near the southern terminus of this glacial advance and the sediments are relatively thin, a few tens of feet. Sediments of the Illinoian glacial advances underlie the Wisconsinan-aged sediments. The last of the Illinoian advances occurred around 125,000 years ago. These glaciers advanced substantially further south than the Wisconsinan glaciers and their preserved sediments are thicker than the younger units. Illinoian sediments were weathered, altered and eroded during the many millennia between the Illinoian and Wisconsinan glacial epochs. Weathering, cracking and the presence of significant sands within the Wisconsinan and Illinoian sediments facilitate significant movement of groundwater. This is verified in

the vicinity of the site by the presence of many domestic water supply wells that produce water from these units (Shaw 2005, Appendix E.3).

Directly beneath the Illinoian glacial sediments is the Mahomet Aquifer, the oldest of the major unconsolidated sediments beneath this site. The gravel and sand of the Mahomet Aquifer is deposited in valleys carved in the underlying Pennsylvanian-aged bedrock, which consists primarily of shale and sandstone with some thin but significant beds of limestone and coal (Shaw 2005, Section 812.314.1). It is the lower part of the Banner Formation that was deposited about 500,000 years ago. The Mahomet Aquifer has been repeatedly penetrated by domestic water supply wells and in the Clinton well field at a depth of around 240 feet and it is typically 100 feet thick. The presence of domestic and municipal water supply wells that produce water from both the glacial sediments and Mahomet Aquifer establish that human are potential receptors of contaminants released from the Clinton Landfill.

Site Hydrogeology

Domestic water wells in the area are often completed in gravels and sands of the Wisconsinan and Illinoian glacial sediments. These local aquifers are sometimes fed directly by precipitation but are also usually recharged with precipitation that infiltrates from the surface through fractures and weathered zones within the fine-grained glacial sediments and through interbedded organic and peat layers. Occasionally private wells will penetrate to gravel and sand units within the glacial sediments below the Illinoian-aged sediments and into the Mahomet Aquifer.

The natural water table surface in the glacial sediments is unconfined and expected to form a subdued replica of the land surface. It will lie below the land surface in topographically high areas and decrease away from those areas to the elevation of Salt Creek. The water table provides the driving force, or potential, for groundwater flow. Under that potential, groundwater flow within the glacial sediments will come from areas of higher topography to areas of lower topography, primarily through pathways of higher conductivity. Groundwater typically recharges in areas of higher topography and discharges to streams or surface water bodies in areas of lower topography. At this site, the shallow flow direction is generally north to south, consistent with the surface topography toward Salt Creek to the south.

The Mahomet Aquifer serves as the major municipal and public water supply source across central Illinois between the Indiana border and the Illinois River (www.isws.illinois.edu/gws/mahomet.asp). Flow in the aquifer is generally from east to west, consistent with greater regional topography. Recharge to the Mahomet Aquifer originates from infiltration through the overlying glacial sediments, recharge from rivers locally where connections exist, subsurface flow from portions of the aquifer east of the Illinois River and some upward flow from bedrock near its regional discharge. The aquifer discharges into the Illinois River as base flow where the river is sufficiently incised. Head levels in the aquifer near Clinton are around 600 to 605 feet above mean sea level (ft-msl). Since the head levels in the Mahomet Aquifer are lower than the elevation of Salt Creek (approximately 635 ft-msl) and the heads measured in the glacial sediments under the facilities, some portion of the groundwater under the facilities migrates to, and recharges, the Mahomet Aquifer.

The base of Clinton Landfill No. 3 will be excavated into the glacial sediments to elevations as low as 665 ft-msl. The base of the excavation approximately coincides with the bottom of the Wisconsin sediments and the top of the Illinoian sediments. The excavation at this level puts the basal liner(s) and the lower portions of the sidewalls of the landfills below the uppermost encountered water during the drilling of boring EX-14 which was recorded at approximately 672 ft-msl. and also below the heads recorded after well completion at location EX-14 (approximately 678 ft-msl) which screens the major water bearing strata at and near the base of the excavation over most of the footprint of the landfill.

If the landfill is constructed and operated in accordance with the pending application, the landfill would maintain an inward gradient (i.e. groundwater will flow from the outside of the landfill toward the artificially maintained low fluid level inside the landfill) as long as the leachate extraction system is properly operated and appropriately maintained. This configuration is a transient condition resulting from the operation of the leachate collection system. During the operating and post-closure periods, moisture brought in with the refuse, precipitation, and groundwater that penetrates the liner will sink to the bottom of the landfill and subsequently be removed via the leachate collection system.

Diffusion of contaminants through the liner will inevitably occur. The permit application contains no evaluation of the magnitude of contaminant diffusion through the liner system during the operating and post-closure period. The groundwater impact assessment considers diffusion only post-closure (i.e., the time at which the leachate collection system is turned off), assuming a “clean” system at the start of post-closure.

It is not until after the post-closure, leachate extraction and monitoring periods that the full potential for release of contaminants from the landfill into groundwater will develop. The Operating Plan takes great care to show that leachate head on the Chemical Waste Unit will be maintained at less than 12-inches during the operating life of the landfill. Leachate collected in the sumps will be removed for offsite disposal. Although the Closure and Post-Closure Care Plan suggests the landfill will be cared for “perpetually”, there is no requirement for continued collection and removal of contaminated leachate after closure. Groundwater inflow through the liner and infiltration through the cap will begin to saturate the waste once the leachate collection system ceases to be operated. Leachate formed from the contact and interaction of this water and waste will saturate the waste to an equilibrium level, the level at which the amount of water flowing into the landfill equals the amount of leachate leaking from the landfill. The application includes no evaluation of the timing, magnitude or impact of these equilibrium releases. Consideration of the final equilibrium condition was not part of the permitting process and was not considered by the Illinois Environmental Protection Agency (IEPA). Therefore, evaluation of equilibrium releases will only be done if required by USEPA.

Evaluation

Adequacy of the Site Characterization

In theory, site characterization provides data from which an understanding of the site can be developed. From that understanding, the facility can be designed, constructed, operated, and monitored reliably.

The facility's performance can also be reasonably projected using computer simulations to assess likely impacts of the facility on proximal and local groundwater conditions into the near-term future.

This sequence is critical because the ultimate criterion for evaluation of a landfill application is the acceptance by IEPA of the facility's computer simulation assessments of the groundwater impacts (GIA). This is the computer projection of landfill impacts 100 feet laterally from the waste boundary 100 years after closure. It is the summary demonstration by the applicant that the landfill will not damage its surroundings beyond a level that is acceptable under the statutes and regulations. Construction of a calibrated, three-dimensional, numeric groundwater model is required in order to adequately investigate and interpret performance of the facility over the long term.

Without a proper sequence of characterization, the subsequent steps of site interpretation, facility design construction, operations and monitoring are not based upon site conditions. Similarly, the computer projections of the GIA are not defensibly based on either site conditions or an appropriately designed, constructed, operated, and monitored facility (i.e., unreliable or indefensible data input results in unreliable and indefensible data output).

The pending application lacks a proper characterization. The sequence for this application began with a presumed understanding of the site upon which the facilities were designed, are being or will be constructed, operated and monitored. Unfortunately it appears that data was forced into a pre-conceived site understanding or ignored when the data did not match this pre-conceived view. The facilities will be monitored by systems that are potentially inadequate to measure impacts. Additionally the applicant used "assumed" input data that varies from being unreliable to being known to represent improbable conditions. Specific examples of insufficiencies, inadequacies, or errors in the application are provided below:

Interpretive Errors and Inadequacies

- **Inattention to Wisconsin Sediments** – The application ignores the significance of Wisconsinian Age glacial sediments with respect to the facility to be constructed. These sediments include obviously weathered till and sand and peat layers as much as 10 feet in thickness, not insignificant amounts. Although these sediments will be removed within the footprint of the excavation, they are also the sediments that will lie adjacent to the sidewalls of the landfill(s). They contain the water table that will rise and fall seasonally and provide the migration paths for contaminants that diffuse or flow from the landfill(s) laterally into undisturbed strata. These may provide unmonitored preferential pathways for contaminants to migrate.
- **Failure to Characterize Water Table** – Review of the boring logs included with the permit application shows that water-bearing sediments are present well above the screened intervals in the Lower Radnor Sand that is depicted as the uppermost water-bearing unit at the site. Likewise

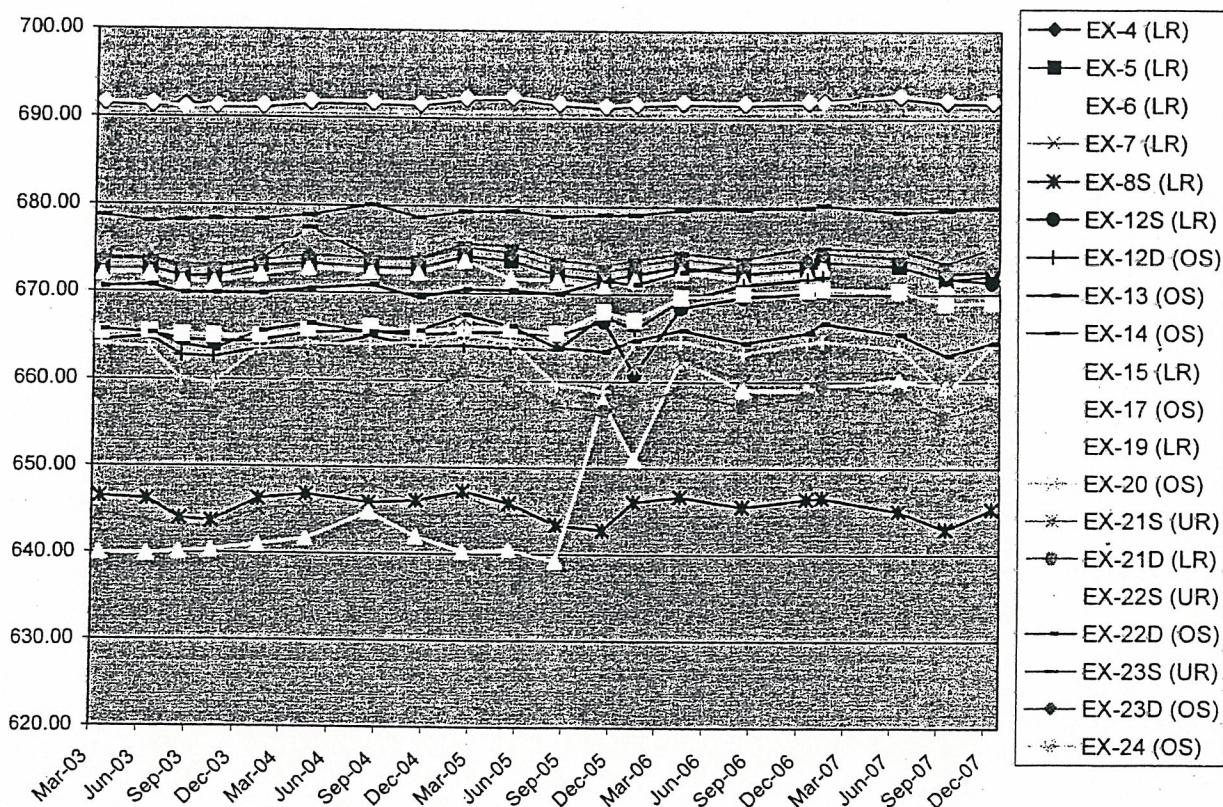
no water table elevation data or water table maps are provided with the application. We have confirmed that your office, the USEPA, was never provided the water table data or water table maps. The groundwater flow direction and velocity at the water table have not been characterized. This is a significant deficiency of the permit application. The water table provides the fundamental driving force for groundwater flow and ultimately determines the potential impacts from this facility.

- **Improper Interpretation of Fine-sediment Properties** – The Landfill’s pending application assumes that the laboratory data collected from boring samples of the fine-grained sediments represents the functional hydraulic conductivity of those layers within the glacial sediments under actual field conditions. This assumption is appropriate only to the degree that it a) is realistically likely and b) is supported by all data at the site. Based on knowledge of regional geologic/hydrogeologic conditions and application data review, neither condition is met. Hydraulically significant fracturing of glacial tills is the rule, not the exception in the midwest, and water moves faster and at higher volumes than laboratory data would suggests; contrary to the Landfill’s assumption hydrogeologic data at the site (gradients, heads and head changes, saturations, field permeability testing, etc.) collectively establish that the fine-grained glacial sediments do not act as impermeable layers significantly inhibiting downward or lateral flow beneath or adjacent to the facility. The large increase in head level recorded in some wells (discussed below) which were not addressed or discussed in the application illustrates the applicant’s lack of understanding of fine-grained sediments.
- **Poor Use of Constraints due to Data Depth** – A review of the mapped extent of the sands deemed important by the application shows an improper or inaccurate integration of the boring data. In particular, there are instances (e.g., wells EX-10, EX-26, EX-27, and EX-29) where wells that may have been too shallow to penetrate the Lower Radnor sand are interpreted as the sand having zero thickness at that location. An absence of data at a location is not evidence of an absence of the sand. This failure is yet another example of the Landfill’s failure to submit an accurate representation of the proposed facility.
- **Inconsistent Interpretations of Flow Systems** – The flow of groundwater in the application is represented as isolated flow within separate, discrete aquifer layers. Contrary, the flow is interpreted as two-dimensional (i.e., strictly within the isolated layers). This ignores the significance of the vertical gradients documented in the data (both upward and downward), seasonal variations, systematic head changes related to site operations, thickness variations, areas where aquifers are absent, and correspondence between head levels in deeper aquifers and the shallowest saturation (first water) at a boring location. One extreme example of the Landfill’s interpretation that is inconsistent with the site data is the mapping of potentiometric surfaces within aquifers as moving water directly across boundaries where the aquifers pinch out. If flow is restricted to occurring within the aquifer, there can be no flow across the zero line (Shaw 2005,

Figures 812.314-19 and 812.314-27). Either the flow direction is wrong, or the map of the limits of the aquifer is wrong. Either way, the Landfill's failure to properly identify groundwater conditions will result in multiple subsequent errors in the application including but not limited to the not being able to properly detect or secure contaminants from migrating from the landfill.

- **Inappropriate Interpretations of Permeability Testing** – The interpretation of the slug test data acquired at the site is inconsistent with the recovery character observed for the tests. Spot-checking the solution shown on the graphs does not reproduce the value reported. The recovery curves for the slug tests are characteristic of curves from a multi-porosity, multi-permeability system, like a combined system of permeable sand and fractured fine-grained tills. The curves are not consistent with a sand aquifer contained within non-permeable bounding beds. Therefore, any results from the evaluation of slug test data must be disregarded or at the very least discounted.
- **Insufficient Evaluation of Head Data** - Review of the groundwater head data supplied with permit application (see graph of heads below) shows that all monitoring wells located along the west and northwest boundaries of the Clinton Landfill (e.g., wells EX-7, EX-12S, EX12-D, EX-13, EX-17, and EX-19) for which head data was reported experienced rapidly rising heads commencing in late 2005 and 2006 while the remaining monitoring wells remained nearly static. This is an unusual occurrence that is completely unaddressed in the permit application.

To identify the cause of the increase in heads, readily available aerial photographs of the site were reviewed. It was observed that what appear to be storm water retention ponds, associated with construction on adjacent portions of the Clinton Landfill, had been constructed near the west and north perimeters of the permit area. If these ponds are the source of water causing the localized rise in heads, the glacial sediments when the proposed Chemical Waste Unit are capable of readily transmitting groundwater in a flow system that is significantly different than that described in the permit application. This casts doubt on the entire site characterization and resulting GIA in the Landfill application.



Monitoring Inadequacies

- **Directions and Rates of Flow** – The hydrogeologic data provided with the application includes a 4-year snapshot of monitoring wells. It is noteworthy that several of the wells showed noticeable -- and in some cases dramatic -- changes in groundwater head which are reflected in changes in the direction and velocity of groundwater flow. Without detailed evaluation and explanation of this, the applicant cannot reasonably infer the range of hydrologic conditions associated with existing or future conditions at the site. From this lack of examination and understanding the USEPA cannot, reasonably assess varying levels of risk to the public health, safety and welfare.

The groundwater monitoring system proposed for the facility is laid out under the premise that flow rates and directions inferred from the original groundwater head levels are representative of the flow rates and directions that will exist after the Chemical Waste Unit is constructed. That assumption is flawed and does not even apply to the existing heads and resulting contemporary flow system. The flow system will change further as a result of the construction of the landfill – it inherently must and has shown that it will change – and the groundwater monitoring system(s)

must be laid out in a manner that is consistent with the anticipated new flow regime to successfully document landfill performance.

Quantifying the extent, location and magnitude of flow regime changes that will result from the expansion to the degree necessary to design a groundwater monitoring network capable of demonstrating protection of the public health safety and welfare, requires a full 3-D numerical groundwater flow model calibrated to existing conditions and verified to transient seasonal variation or, if available, earlier historic data. The application suggests two material changes to the existing flow system (from construction) that would be expected at this site. The first is change to the lateral flow patterns in response to the insertion of the landfill mass into the horizontal flow system in the unconsolidated sediments. The second are the changes to the vertical component of the flow system that will occur as a result of depriving additional (landfill and Chemical Waste Unit footprints) acres of their existing recharge. These were not considered in the application and are discussed below.

In comparison to the existing unconsolidated sediments, the volume of the landfill mass encased in the basal liner would function as a barrier to horizontal groundwater flow. A low-permeability barrier inserted into a horizontal groundwater flow system has an impact directly analogous to dropping a boulder into a flowing stream. Water that previously could flow through the aquifer volume now occupied by the landfill either cannot flow or must find a new path around the obstacle. Like the boulder, the landfill will create a bow wave with divergent flow upgradient (upstream) and there will be convergent shadow downgradient (downstream) of the landfill.

Vertical flow at this site is demonstrably important to understanding conditions and monitoring post-construction conditions. With the exception of the well cluster located nearest Salt Creek, the hydrogeologic data with the application provide evidence of predominantly downward vertical gradients across most of the existing facility and the expansion areas. The hydrogeologic characterization in the application completely fails to assess the significance of this downward driving force, the magnitude of the downward flow in response to it, its significance to the overall flow of groundwater under the proposed landfill, and its implications upon monitoring the post-construction hydrogeologic system that will control contaminant migration.

The full, properly designed and calibrated, three-dimensional numerical groundwater model suggested above, including a GIA evaluating the final equilibrium condition after post-closure, would appropriately evaluate this potential deficiency and the ability of the proposed monitoring system to adequately detect releases into the groundwater flow system that has been modified by construction of such an extensive barrier to existing groundwater flow. Insisting upon such modeling and evaluation would allow USEPA to make an informed determination that is based upon demonstrated performance and sound scientific principles – rather than simple acceptance of hopeful projections and assumptions by the applicant.

- **Verification of HELP Simulations** – The Site Location Application presents considerable detail about expected leachate generation rates derived from use of the Hydrologic Evaluation of Landfill Performance (“HELP”) model. The HELP results are presented by the permit applicant without any calibration and without a monitoring program that provides verification of the assumptions and simulated results. Careful monitoring and reporting of the volume and chemistry of leachate produced in the Chemical Waste Unit, would provide near real-time verification whether the landfill is or is not performing to the planned specifications. Departure from the HELP performance projections would allow design modification and/or remedial actions to be taken proactively, before a more significant contamination problem develops.

In order to take advantage of the opportunity to monitor actual landfill performance, model simulations of monthly leachate generation in the Chemical Waste Unit should be submitted for both the operating and closed conditions. The USEPA should also require monthly reporting of the volume of leachate pumped. Comparison of HELP-predicted rates to the actual leachate generation rates would indicate whether individual cell liner and cover systems are functioning as assumed in the HELP simulations.

- **Leachate Production and Internal Head Monitoring-** The Environmental Monitoring Plan calls for leachate samples from the Chemical Waste Unit to be collected and analyzed on a monthly basis during site operation. This monitoring should be expanded to include the post-closure period as well. Tracking the chemistry of leachate, in parallel with fluid production described above would allow regulators to identify unexpected changes that signal breeches or construction flaws in the landfill liner or cover systems and allow for timely implementation of remedial measures.

The Landfill applicant should also install piezometers within the Chemical Waste Unit in order to assure accurate measurement of leachate elevation. Piezometers would also allow ready detection of leachate buildup in the landfill if the geotextile fabric and/or filter material in the leachate collection systems became bio-fouled or plugged with sediment during or after the leachate extraction system is operational.

- **Perimeter Monitoring-** Effective perimeter monitoring can only occur if the monitoring occurs at locations and times where contamination will occur. As discussed above, the monitoring locations currently planned at depths below the landfill invert are located not based on the flow system that will exist after the facility is in place. Perimeter monitoring must also be installed laterally along the sides of the landfill to verify no unacceptable leakage from the sidewalls. This monitoring must include groundwater pathways in saturated sediments and soil gas pathways in unsaturated sediments.
- **Sub-Landfill Monitoring-** The post-construction site will virtually eliminate recharge over the footprint of the landfill(s). However, recharge will continue as it does currently outside that

footprint. That change in the distribution and quantity of recharge, coupled with the downward vertical gradients across most of the site, will result in lateral convergence of flow from the flanks toward the facility and downward under it. Perimeter monitoring will simply observe the water moving toward the landfill, not water flowing away from the landfill. As proposed the only contamination that might be observed would be diffusive transport outward that exceeds flow transport toward the landfill. For meaningful monitoring in the significant paths of flow, the operator must also monitor under the landfill, not just around its flanks.

- **Duration of Monitoring-** Throughout the period of landfill operation and during the nominal 30-year post-closure care period, the landfill owner is required to maintain and operate the leachate collection system and monitor groundwater to detect releases. Barring catastrophic liner or cover failure or improper construction, continuing operation of the leachate collection system will maintain the inward groundwater gradient discussed in the application.

When the post-closure care period expires, infiltration of groundwater through the liner and precipitation through the cap will continue but leachate will no longer be removed. Leachate will then, 30-years after site closure, begin to accumulate in the closed cells, initially at the sumps and then flooding progressively higher in the waste and progressively further up the slope of the individual cells away from the sumps. Leachate will saturate the waste to an equilibrium level at which the amount of water flowing into the landfill equals the amount of leachate leaking from the landfill. The process of saturating the waste to the equilibrium point may take additional years depending upon the failure rates of the liner and cover, but saturation of the waste is inevitable. At that equilibrium point in the future, when the potential for significant releases from the landfill is highest, regular sampling of the monitoring wells is no longer required by IEPA. Without additional USEPA-imposed monitoring requirements, the first notice that leachate levels have risen, that outward flow has begun, or that groundwater is being contaminated, will be contamination of an area water supply well or surface water body. Thus, the USEPA should require:

- 1) A review of the groundwater flow and monitoring systems at the landfill be conducted upon closure of the landfill and at 5-year intervals thereafter until equilibrium conditions, both inside and outside of the landfill, are established to verify the monitoring system continues to be capable of detecting a release; and
- 2) Monitoring of the functioning groundwater monitoring system continues for a minimum of 30-years after equilibrium conditions are verified. Extension of the post-closure care monitoring period in this manner will provide the public a level of assurance that its health, safety and welfare are being protected.

Evaluation of Impacts to Groundwater

Impacts to groundwater were assessed by the permit applicant using the MIGRATE program. The validity of the results of the MIGRATE simulations are not defensible for each of the problems in hydrogeologic characterization that are described above. However, beyond the problems with inputs to the program (identified above), there are other weaknesses to this GIA related to the choice of the program, the design of the simulations, and the conditions being simulated. Even if the above noted characterization problems were eliminated, the simulations run by the permit application would not produce meaningful results due to the following deficiencies:

Limitations of MIGRATE

- **Model Cannot Be Calibrated** – The model is deterministic. The projections of future concentrations assume the input flow systems are correct; there are no provisions within the model to either verify that or to use the model results to improve the input. The model does not compute flow paths, head values, head gradients, discharge rates, or changes of any of these against which to check observational data. The inability to calibrate MIGRATE robs the user from the opportunity to perform a critical check of validity of model inputs. Without calibration, there can be no check of modeled conditions against actual field conditions. If there are unidentified erroneous inputs, the model will generate a meaningless calculation that does not reflect known conditions and does not predict future impacts.
- **Simulation Does Not Use Fundamental Hydrogeologic Data** – The input to the model does not include head data, permeability data, or spatial variations in such data. The user provides a single specific flux value for vertical flow and a single specific flux value for horizontal flow. Developing these flux values for input must be done outside the model from the appropriate data. Proper reduction of the fundamental hydrologic data is imperative for MIGRATE to render a model that reflects the hydrogeological conditions at this site and to project future impacts. As developed the model used to support this application is not capable of simulating or even remotely resembling actual site conditions.
- **Mass Balance is not a Constraint** – The model does not confirm the flux values that are input for consistency or mass balance. For example, twice as much water can be designated as entering a layer as is leaving the layer and there is no resulting impact, such as head increases, because heads are not part of model input or model computation. Similarly, twice as much water can be defined as leaving a layer as entering the layer, and the layer does not go dry. Further, the model does not consider changes within a layer as water is added or removed along a flow path. These failures result in erroneous model values.
- **Model Simulates only 2-D Slice** – The equations that are solved assume infinite homogeneous and isotropic conditions exist at right angles to the slice that is simulated.

- **Model Layers are Infinite and Invariable** – There can be no changes to the parameterization of a layer in the model. If a vertical flux of 6 inches per year enters Layer 2 at one point, it enters at that rate everywhere in the model. If the water flowing out of the layer horizontally is 12 inches per year, the horizontal flow is 12 inches per year everywhere along it, regardless of water that is specified to be flowing into or out of it vertically. One implication of this is that the specified conditions of liner properties and liner fluxes appropriate for flow through the liners are also assigned outside the landfill where conditions are known to be dramatically different. Again, this is an inaccurate characterization, results in an incorrect representation of conditions renders the erroneous model predictions, and fails properly to assess potential impacts.
- **Baseline/Background Concentrations Cannot Be Set** – The model assumes that there is zero concentration of a contaminant outside the landfill at the start of the simulation and that only the landfill is a source of the contaminant. While this assumption is perhaps appropriate for strictly anthropogenic compounds, it is not a valid constraint for any compound that is also naturally occurring or that exists in background due to a pre-existing source, such as is common in agricultural communities.
- **Only Vertical Migration from Landfill is Simulated** – The model can only simulate contamination migrating downward from the base of a landfill. Lateral migration from the flanks cannot be simulated, nor can such lateral contamination be simulated as migrating downward with groundwater flow - as is observed and documented at this site.

Design of the GIA Simulations

- **Simulations Only Evaluate Landfill Half-Space** – The simulation is structured to look only at the results of contamination from the center of the landfill to the downgradient edge of the landfill. With respect to early migration and migration through the clay liners, contamination migration is dominated by diffusion which knows no upgradient and downgradient limitations. Further, this spatial perspective does not allow simulation of the Municipal solid waste landfill that will be upgradient of the chemical waste facility. Contamination from the chemical waste facility will add to that from the municipal facility. This failure again results in inaccurate results from the model.
- **Simulations Only Evaluate Zone of Attenuation** – The simulation is structured only to look at the first 100 feet from the waste boundary. The model should be structured to allow simulation of the system at greater distances. Simulations that look at the solution at greater distances often reveal problems in the inputs to the numeric parameters at distances greater than 100 feet. That check is not possible as the model is structured for this GIA.
- **Simulations only Evaluate 100 years Post-Closure** – The simulations for this GIA are limited to 100 years post-closure. If the landfill is built successfully to its design, that period of time will largely be a period of refilling to bring the system back to equilibrium. To establish risks from the facility, simulations need to be run to determine the approximate time when the landfill reaches

equilibrium conditions. Additional simulations would then be necessary to consider the eventual and permanent condition of outward flow for at least 100 years after equilibrium conditions are reached.

- **Simulations Ignore Vertical Flow in Soils** – The Landfill Applicants' simulations do not include the observed vertical flow in the glacial sediments at the site.
- **Simulations Preclude Vertical Flow below Uppermost Aquifer** – The Landfill's simulations do not allow any penetration of contamination below the upper-most sand.
- **Simulations Ignore Overlying and Adjacent Municipal Landfill** – The simulations assume the chemical waste facility is a facility with nothing around it. The concentrations used as source terms do not recognize the potential of municipal leachate impacting the leachate in the chemical waste unit. The simulations do not consider the impacts of contaminant migration from the municipal landfill to groundwater that is upgradient of the chemical waste landfill, contamination to which the latter facility would add.
- **Sensitivity Simulations Test Single Parameters** – The sensitivity runs that were made are not meaningful from the standpoint of hydrogeology. Accepting for the sake of argument that inputs to the base case did represent parameters appropriate to a well-characterized and calibrated understanding of the site hydrogeology, the purpose of the sensitivity runs is to determine whether the results vary significantly if there are errors in that original interpretation. That cannot be done by taking a single parameter and changing its value. Doubling the hydraulic conductivity for example is unrealistic and unreliable unless a corresponding change is made to other parameter(s), such as recharge, such that the input set still describes a calibrated system. Sensitivity runs of single parameters require a demonstration that the variation maintains a modeled domain with parameterization that is at least possible. Without such demonstration, as was done with this implementation of MIGRATE, runs potentially simulate systems that cannot exist. Such modeling does not provide indications of meaningful uncertainties in fate and transport.

Hydrogeologic Conditions for the Simulations

- **Flow Directions Simulated Are Not Possible** – The orientation of the model slice needs to be parallel to the direction of horizontal flow. As discussed in earlier comments, flow directions are mapped in a manner inconsistent and physically impossible with respect to the mapped distribution of the sands.
- **Vertical Fluxes Simulated Are Unsupported by Data** – The vertical fluxes that are used in the simulations are not representative of the vertical fluxes observed in site data. First, the vertical fluxes used by the applicant ignore vertical flow through the glacial sediments and are simply assigned at all layers as the hypothetical flow leaking through the landfill liner - a rate far less than the flow through the glacial sediments. Second, the model assigns a no-flow, no-diffusion

boundary at the base of the sand being simulated. This precludes evaluation of further downward migration in a system dominated by vertical from the surface to the Mahomet Aquifer.

- **Pre-Construction Flow Is Simulated** - As discussed above, the evaluation of the flow directions and hydraulic gradients is based upon pre-construction head readings at the various wells. Even at this point, significant differences have developed as a result of construction activities. Further changes will occur from additional construction as more area is put under the footprint of liners and as surface water is re-routed. Meaningful fate and transport modeling can only be done using the best understanding of the post-construction hydrogeology that will control post-construction migration. No attempt has been made to develop an understanding of that controlling system.

Additional Review Notes

As part of the general/overall review of the provided, KPRG has identified several additional deficiencies, errors, and points of concern. These issues are summarized below:

- The copy of the CQA Report and Certification by SKS Engineers, Inc. dated March 2007 provided was incomplete and out of order.
- In Attachment 5, Section 6 - the calculated field permeability average was incorrect. SKS incorrectly calculated an average Boutwell field permeability result of 3.28×10^{-9} cm/sec versus the actual value of 9.82×10^{-9} cm/sec. This error results in a false conclusion that the horizontal field permeability could be calculated by multiplying the laboratory permeability by a multiplier of 2 when the actual multiplier was 0.334. Due to this error, SKS' calculation underestimates the horizontal field permeability.
- The January 2009 Slope Stability Analysis by the Shaw Group using the SLIDE modeling program analyzed only one mode of failure: foundation stability. However, given the proximity of the proposed Clinton Landfill No. 3 to the existing municipal solid waste landfill (plans ultimately call for one to "toe out" above the other), a complex failure mode should also be simulated. Such a complex failure could occur if one failure mode induces another. For example, a rotational or translational slide could induce a flow of or a fall failure of the foundation. Such two-part failure scenarios were not contemplated and the potential affects of the existing manmade landfill structure were not considered.
- Due to the stable chemical nature of PCBs, their potential to threaten groundwater resources extends past the stated monitoring period (34 years of active landfill use and 30 years of post closure). According to the US Department of Health and Human Services Agency for Toxic Substances and Disease Registry, there are up to 209 individual chlorinated compounds that are known as PCBs. Despite a wealth of research concerning these chemicals, their exact half lives

remain unknown. However, studies by the USEPA and others of sediments in New York's Hudson River indicate PCBs have the potential to persist in soils and sediments for more than 60 years. Therefore, the proposed monitoring period is inadequate to protect area potable water supplies.

- A possible conflict of interest was noted in that Peoria Disposal Company (PDC), the proposed landfill's owner, appears to be planning to use its subsidiary, PDC Laboratories, Inc., to analyze quarterly, semi-annual, and annual groundwater samples. In KPRG's opinion, the analysis should be conducted by an independent laboratory with no affiliation or shared interests with PDC.
- The Appendix D drawing from the January 2009 Additional Information on the LFG Management System was missing from the attachment produced by USEPA.

Summary and Conclusion

The applications for Clinton Landfill No. 3, including the chemical waste cells, gained IEPA approval based upon computer simulations that estimated acceptable levels of contamination at the lateral compliance boundary 100 years after landfill closure. Those simulations were performed using a program that is extremely limited in its capabilities. The simulations performed largely ignored limitations of the software. The limitations of the software were seemingly exploited instead to generate acceptable results that do not reflect probable reality.

The partially biased implementation of the modeling software limitations is not the greatest problem with the GIA. The greatest problem is the failure of the applicant to produce a reasonable, meaningful, and representative interpretation of the site hydrogeology based upon the extensive degree of exploration and applicable data. Based upon the expressed understanding of the site, it is apparent that the expressed "understanding" is not unbiased interpretation – but rather is a statement of a preconceived notion or anticipation of the geology and hydrogeology. The results are simulations of possible fate and transport of contaminants from the chemical waste units, but without support from site data.

To meaningfully simulate the potential of the site to impact the surrounding areas, the characterization data must be reviewed in detail and interpreted into a geologic and hydrogeologic system that honors known geologic and hydrogeologic principles and actual site data. That new understanding of the site must then be conveyed into a three-dimensional numerical groundwater model capable of assessing impacts to groundwater in the vicinity of the landfill both laterally and vertically. That assessment needs be done at the 100-ft and 100-yr thresholds. But the assessment also must be performed at times and places that represent the maximum and/or most damaging to human health and the environment (i.e. after equilibrium conditions are established which will occur at some yet undefined time after leachate

collection system shut-down). That new assessment should include an integrated assessment of the time(s) and place(s) of impact to the Mahomet Aquifer regardless of arbitrary regulatory timeframes.

On behalf of our project team, we invite you to contact us at any time should you have questions about this evaluation.

Very truly yours,

KPRG and Associates, Inc.

A handwritten signature in black ink, appearing to read "D. G. Pyles", with a stylized flourish at the end.

David G. Pyles, P.G.
Principal

ILLINOIS LEGAL SELF-HELP CENTERS

