

Preliminary Farmland Drain Tile Investigation

Omission of Drain Tile Investigation

Based on the site conditions and project scope, a formal investigation for agricultural subsurface tile drains is not required for this project. The subject property is established and operated as a capped landfill, and the entire parcel is covered with waste placement and engineered cap systems. In place of the typical agricultural field conditions where tile drainage may otherwise have been installed, this site features infrastructure more consistent with landfill operations—such as gas ventilation systems, storm-water conveyance channels, and surface drainage features designed to manage runoff rather than promote subsurface agricultural drainage. Because no tile drains were installed (or are expected) under these landfill conditions, the investigation into traditional farmland drain tiles is not applicable to this project. Furthermore, under Superfund Law, it is prohibited to conduct a tile drainage survey on this project site.

History of the Project Site:

The Tri-County/Elgin Landfill sites located in Kane County operated between 1968 and 1976. The sites were used to dispose of municipal, commercial, and industrial wastes during those years and some of these materials were disposed of improperly. This led to investigations of the landfill from 1988 to 1992, to which investigators identified contamination in soil, sediment, and groundwater. These contaminants could migrate off-site through rain and snowmelt. The landfill was closed under court order in 1981 (EPA - United States Environmental Protection Agency, 2025).

What Has Been Done to Clean Up the Site?

The cleanup occurred from 1999 to 2001. Activities included excavation and capping of contaminated soil, construction of a landfill cover to prevent infiltration, collection and treatment of landfill gas, monitoring of groundwater, and restrictions on land and groundwater use. After clean-up, investigators concluded that there was no contamination at locations away from the site.

The current property was issued an Environmental Covenant as a form of long-term protectiveness. Within this covenant, land-use and activities restrictions were issued that prohibits any form of interference with the cap. As such, the US EPA has prohibited for this site to have any form of soil penetration, to which a tile drainage survey would qualify. Tile drainage surveys are invasive to the ground and would hinder the integrity of the cap. As such, we are federally prohibited to conduct such surveys at this location. Additionally, it restricts any land use that would allow the continued presence of human exposure, and limit groundwater use. Compliance with state-required institutional controls known as “continuing obligations” will be accomplished by monitoring and enforcing them. This has been in place since 2013 (EPA - United States Environmental Protection Agency, 2025).

What Is the Current Site Status?

The Superfund law requires regular checkups of sites that have been cleaned up – with waste managed on-site – to make sure the cleanup continues to protect people and the environment.

The fifth review conducted in 2024 included an evaluation of background information, cleanup requirements, effectiveness of the cleanup, and maintenance and monitoring efforts. It also looked at

ways to operate more efficiently. The review concluded the cleanup is protecting people and the environment (EPA - United States Environmental Protection Agency, 2025).

Prohibited uses of this site would include commercial, agriculture, recreational, and residential uses are strictly prohibited for this site. The only compatible uses would be industrial land use if there is no soil penetration on the site. Solar energy has deemed as a compatible use for this property (EPA - United States Environmental Protection Agency, 2025).

References

EPA - United States Environmental Protection Agency. (2025, 11 13). Retrieved from Superfund Site: TRI-COUNTY LANDFILL CO./WASTE MANAGEMENT OF ILLINOIS, INC., ELGIN, IL:
<https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0500340>

EPA - United States Environmental Protection Agency. (2025, 11 13). Retrieved from Cleanup Activities:
<https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.cleanup&id=0500340>