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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:)	
)	
YEOMAN CREEK LANDFILL FACILITY)	ADMINISTRATIVE ORDER
<u>LAKE COUNTY, WAUKEGAN, ILLINOIS</u>)	BY CONSENT RE:
)	
Respondents:)	REMEDIAL INVESTIGATION/
)	FEASIBILITY STUDY
City of Waukegan; Waukegan)	(RI/FS)
Public School District 60;)	
Browning-Ferris Industries)	U.S. EPA Docket No.
of Illinois, Inc.; Outboard)	
Marine Corp.; The Goodyear Tire)	V-W-91-C-092
& Rubber Company; The Dexter)	
Corporation;)	
)	
Proceedings under Sections 106,)	
107 and 122(a) of the Comprehensive)	
Environmental Response, Compensa-)	
tion, and Liability Act of 1980,)	
as amended)	

SECOND AMENDMENT TO ADMINISTRATIVE ORDER BY CONSENT

The above-named Respondents (referred to as Respondents), the United States Environmental Protection Agency (U.S. EPA), and the Illinois Environmental Protection Agency (IEPA), have each agreed to making and entry of this second amendment to the Administrative Order by Consent (Second Amendment) for the Yeoman Creek Landfill Facility (Facility) in the City of Waukegan, Lake County, Illinois. The initial Consent Order (Initial Consent Order) for this Facility became effective on December 22, 1989. The first amendment to the Consent Order (First Amendment) became effective on March 11, 1991. Work and other obligations remain to be completed under the Initial Consent Order as amended by the First Amendment. The Initial Consent Order as amended by all effective amendments shall be referred to as the Consent Order.

I. JURISDICTION

The Second Amendment is issued pursuant to Section XXVIII of the Initial Consent Order, and the authorities identified in the Initial Consent Order. In addition, the Second Amendment is issued pursuant to Sections 106(a) and 107 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. Sections 9606 and 9607. This authority has been delegated to the Administrator of the U.S. EPA by Executive Order No. 12580, January 23, 1987, 52 Federal Register 2923, and further delegated to the Regional Administrators by U.S. EPA delegation Numbers 14-14-A and 14-14-D, and to the Director, Waste Management Division, Region V, by the Regional Delegation Numbers 14-14-A, 14-14-C, and 14-14-D. Except as specifically amended herein, the findings of fact, conclusions of law, determinations, and terms, and all rights and obligations of the Consent Order, are applicable to the Second Amendment.

II. STATEMENT OF PURPOSE

In entering the Second Amendment, the mutual objectives of the U.S. EPA, IEPA and the Respondents are as follows, in addition to the work and obligations required pursuant to the Initial Consent Order as amended by the First Amendment:

- to add Goodyear and Dexter as Respondents to the Consent Order, liable with other Respondents for all

obligations required by the Initial Consent Order as amended;

- to require the Respondents to perform certain removal action measures to minimize exposures to landfill gases from the Facility;
- to provide for reimbursement of response costs incurred by the United States and Illinois regarding this removal action; and
- to clarify the present known extent of the Facility.

The removal action described herein is necessary to protect the public health, welfare, or the environment that may be presented by the actual or threatened release of hazardous substances at or from the Facility. This work shall be appended to the work to be performed during the Remedial Investigation.

A copy of this Consent Order will also be provided to the State of Illinois, which, through the IEPA, is a signatory to this Consent Order, and has been notified of the issuance of this Consent Order pursuant to Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a). Respondents agree to comply with and be bound by the terms of this Consent Order. Respondents further agree that they will not contest the basis or validity of this Consent Order, or its terms.

III. FINDINGS OF FACT

Without admission of any fact, conclusion of law or liability by the Respondents, the Waste Management Division Director of the U.S. EPA, Region V, and the Director of IEPA make the following findings in addition to those made in the Initial Consent Order and the First Amendment:

A. The Facility includes those areas where waste has come to be located. The waste delineation conducted by the Respondents indicates that landfilled waste extends south of Edwards Field Park and north of the property owned by the Waukegan Public School District 60, currently known as the Yeoman Creek Landfill, as shown in Figure 9 of the Source Characterization Memorandum dated March 1993.

B. The Remedial Investigation/Feasibility Study (RI/FS) required pursuant to this Consent Order includes investigation for subsurface migration of landfill gases. Landfill gases are commonly generated at landfills due to anaerobic decomposition of putrescible wastes. Off-site subsurface migration of landfill gas is also a common concern at landfills. Landfill gases normally consist of large percentages of methane and carbon dioxide, as well as trace concentrations of hazardous substances. Fire and explosion hazards from landfill gases (due to the methane) are well documented (see 56 Federal Register, No. 104, May 30, 1991, p. 24474).

C. Procedures for the investigation of landfill gases were established in the RI/FS Work Plan dated July 1991. Measurements used as indicators of the presence of landfill gases included percentage of the lower explosive limit (LEL) using an explosimeter, and an indication of total organic compound content using a flame ionization detector. Gas probes were installed along the perimeters of the landfill to detect migration of landfill gases off of the site.

D. Elevated LEL readings were obtained in soil gas from a number of perimeter landfill gas probes. This indicated that landfill gases were migrating in the subsurface from the landfill. In response to this condition, basements and crawl spaces located within 300 feet of perimeter gas probes with elevated readings were surveyed for entry of combustible gases and hazardous substances in the gaseous phase using an explosimeter and flame ionization detector. These buildings were surveyed twice, once between September 28 and October 21, 1992 and again between January 18, and February 1, 1993. The procedures for these tests were finalized in correspondence between U.S. EPA and Golder Associates, the Respondents' contractor. Also in February and March 1993 temporary probes were installed along a number of transects emanating from the site in areas where the perimeter probe readings indicated that landfill gases may be migrating. The procedures for the temporary gas probe survey is presented in the Revised Addendum

to RI/FS Work Plan, Additional Landfill Gas Monitoring, dated January 1993.

E. The following explosimeter readings were obtained at the 1401-1451 Golf Road building. This building includes commercial facilities on the ground floor and apartments above:

Location	Date	% LEL
1401 Golf, basement ambient air	10/2/92	3-5
1401 Golf, SE corner where sump is located	10/2/92	60-100*
1401 Golf, basement ambient air	10/8/92	4-5
1401 Golf, inside north tile	10/8/92	>100
1401 Golf, basement ambient air	1/21/93	1-10
1415 & 1419 Golf, sump inside tile	9/30/92	6
1425 Golf, basement breathing zone	1/21/93	4
1425 Golf inside south tile	1/21/93	>100
1431 Golf, inside tile	9/30/92	47
1431 Golf, inside tiles	10/7/92	16 & 13
1431 Golf, basement breathing zone	1/20/93	2-3
1431 Golf, gas vent and inside tiles	1/20/93	90-100
1451 Golf, breathing zone basement	9/30/92	5
1451 Golf, inside south tile	9/30/92	47
1451 Golf, floor drain and tiles	10/7/92	87-100
1451 Golf, basement breathing zone	1/21/93	8-10
1451 Golf, cracks in floor	1/21/93	10-100*
1451 Golf, holes	1/21/93	14-100*

*oxygen levels were not measured in connection with this sample

F. On October 7 and 8, 1992, the Respondents collected air samples for analysis of chemical constituents from a basement sump and ambient air at 1451 Golf, and a basement sump at 1401 Golf Road. The following hazardous substances were detected in at least one of these samples: vinyl chloride, cis-1,2-dichloroethylene, benzene, toluene, ethyl benzene, xylenes, and styrene.

G. On October 7, 1992 one landfill gas probe was sampled and analyzed for chemical constituents, and on February 10, 1993 five landfill gas probes were sampled and analyzed for chemical constituents in accordance with the RI/FS Work Plan. The following hazardous substances were detected in at least one of these samples: trichlorofluoromethane, chloroethane, cis-1,2-dichloroethylene, chloroform, benzene, trichloroethylene, toluene, xylenes, styrene, 1,1,2,2-tetrachloroethane, and tetrachloroethylene.

H. Vinyl chloride, and benzene are classified by U.S. EPA as group A known human carcinogens; chloroform and trichloroethylene as group B2 probable human carcinogens; and styrene as a group C possible human carcinogen, based on U.S. EPA's weight-of-evidence classification system for carcinogenicity.

I. Non-cancer human health effects are also associated with exposures to the hazardous substances detected in the landfill gas from this Facility.

J. Elevated explosimeter readings were obtained in soil gas from the temporary probes in various locations between the northern boundary of the landfill and Golf Road, including in a location 14 feet east of the Terrace Nursing Home. Elevated explosimeter readings were not obtained in the Terrace Nursing Home. However, one of the sumps in the Terrace Nursing Home was not monitored because it was below an elevator shaft.

K. In an effort to prevent combustible gases and hazardous substances in the gaseous phase from entering the basements in the 1401-1451 Golf Road building, the Respondents installed traps on the footing drains at the sumps in February 1993, and later in March and April 1993 the Respondents installed vents on these traps. Following these actions, the following monitoring results were obtained: up to 10% LEL was detected in the breathing zone in the basement at 1451 Golf Road; up to 100% LEL was detected in some cracks in the basement at 1451 Golf Road; up to 6% LEL was detected in the breathing zone in the basement at 1401 Golf Road; and up to 100% LEL was detected in cracks in the basement at 1401 Golf Road.

IV. CONCLUSIONS OF LAW AND DETERMINATIONS

Based on the Findings of Fact set forth above, and the Administrative Record supporting these actions, the Waste Management Division Director of U.S. EPA, Region V, and the Director of IEPA have made the following conclusions of law and determinations in addition to the determinations in Section VII

of the Initial Consent Order and Section IV of the First Amendment:

A. The Yeoman Creek Landfill site is a "Facility" as defined by Section 101(9) of CERCLA, 42 U.S.C. Section 9601(9).

B. Vinyl chloride, cis-1,2-dichloroethylene, benzene, toluene, ethyl benzene, xylenes, styrene, trichlorofluoromethane, chloroethane, chloroform, trichloroethylene, 1,1,2,2-tetrachloroethane, and tetrachloroethylene, are "hazardous substances" as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14).

C. Each Respondent is a "person" as defined by Section 101(21) of CERCLA, 42 U.S.C. Section 9601(21).

D. Respondents are persons who arranged for disposal or transport for disposal of hazardous substances at the Yeoman Creek site, or are a present owner or operator of the site, or an owner or operator at the time of disposal. Each Respondent, therefore, may be liable under Section 107(a) of CERCLA, 42 U.S.C. Section 9607, and are potentially responsible parties for the purposes of Sections 106 and 122 of CERCLA, 42 U.S.C. Sections 9606 and 9622.

E. The conditions described in the Findings of Fact above constitute an actual or threatened "release" of a hazardous

substance from the Facility into the "environment" as defined by Sections 101(8) and (22) of CERCLA, 42, U.S.C. Section 9601(8) and (22).

F. The conditions present at the site constitute a threat to public health, welfare, or the environment based upon the factors set forth in Section 300.415(b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan, as amended (NCP), 40 CFR 300.415(b)(2). These factors include, but are not limited to, the following:

1. Actual or potential exposure to nearby human populations, animals or the food chain to hazardous substances, pollutants or contaminants (this factor is documented to be present at the site due to the monitored existence of gases containing vinyl chloride, cis-1,2-dichloroethylene, benzene, toluene, ethylbenzene, xylenes, and styrene entering the basements of a structure adjacent to the site with commercial facilities on the ground floor and apartments above);
2. threat of fire or explosion (this factor is documented to be present at the site due to obtaining explosimeter readings as high as 100% LEL from gases entering a residential and commercial structure adjacent to the site).

G. The actual or threatened release of hazardous substances from the site may present an imminent and substantial endangerment to the public health, welfare, or the environment within the meaning of Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a).

H. The abatement actions required by this Consent Order are necessary to protect the public health, welfare, or the environment, and are not inconsistent with the NCP and CERCLA. The activities approved by EPA and conducted in compliance with this work shall be considered to be consistent with the NCP, as provided at 40 CFR 300.700(c)(3)(ii). Further, it is EPA's intention that Respondents have protection from contribution claims pursuant to 42 USC 9613(f)(2) for activities conducted in compliance with the requirements of this Consent Order.

I. The abatement actions required by this Consent Order are not inconsistent with the anticipated long-term remedial actions for this site.

J. Respondents are qualified to implement the actions required under this Second Amendment.

K. EPA reserves its right to seek additional actions outside the scope of this amendment in the event it determines the work to be performed pursuant to this Second Amendment to the Order is inadequate.

V. PARTIES ADDED

A. Goodyear and Dexter have agreed to be added as Respondents to the Consent Order regarding the Yeoman Creek Landfill Facility, Lake County, Waukegan, Illinois; have agreed to the making and entry of the Consent Order; have agreed to be bound by the terms and conditions of the Consent Order, as amended; have agreed to be liable for all obligations of the Initial Consent Order, the First Amendment, and this Second Amendment; and have evidenced their agreement to the Consent Order as amended, by signing this Second Amendment to Administrative Order by Consent.

B. Goodyear and Dexter shall be bound by the terms and conditions of the Consent Order, as amended, as if a signatory thereto, and shall thereafter be a Respondent to the Consent Order, as amended, responsible for all obligations of the Initial Consent Order and its amendments.

VI. WORK TO BE PERFORMED

Based upon the foregoing Findings of Fact, Conclusions of Law and Determinations, it is hereby ordered and agreed that the Respondents shall comply with the following provisions, including but not limited to all documents attached to or incorporated into this Consent Order, and perform the following actions:

A. Removal Action

1. Ventilation System in the 1401-1451 Building.

a. Ventilation System

The Respondents shall install a ventilation system in each basement of the 1401 to 1451 Golf Road building. This system shall be designed to maintain a positive pressure differential between the interiors and exteriors of the basements, by continuously blowing fresh outside air into the structures at a higher rate than air is extracted. Thus, each basement unit shall be equipped with an air inlet, through which fresh air will be pumped, and an exhaust outlet, through which basement air will be extracted. In the engineering judgment of the Respondents, maintenance of this positive pressure differential will prevent combustible gas and hazardous substances in the gaseous phase from migrating into the basement spaces. Further, if such gases do enter the basement of the building, exhaust outlet should promote continuous purging of such gases from inside the building to the outside air. An air flow paddle switch shall be installed in each positive pressure delivery duct in each unit and in each negative pressure exhaust duct. Each paddle switch will operate in a manner such that loss in system flow (either in the pressurization or exhaust systems) will activate a remote enunciator which will automatically inform a designated representative of the Respondents of the existence of a system fault. Details such as a identity of the Respondents representative, contact information and required response time, will be provided prior to system startup in an approved Operation and Maintenance (O&M) Plan, but will include response to inspect the system by the next business day. If a system breakdown is found, the system will be diligently restored.

b. Performance Monitoring

The Respondents shall verify the performance of the ventilation system by periodic monitoring of air in each basement with a combustible gas indicator (CGI) and a flame ionization detector (FID). Monitoring will be conducted on a weekly basis during the first month of operation of the ventilation system and monthly thereafter for a period of five months. If the monitoring results demonstrate that the air exchange system is satisfying the design performance standards, the Respondents may petition the U.S. EPA to discontinue periodic monitoring. If periodic monitoring results show combustible gas concentration in excess of 100 parts per million by volume in the breathing zone (four feet above the basement floor level), the Respondents shall conduct confirmatory testing and, if the original results are confirmed, shall re-evaluate the system design and performance in consultation with the U.S. EPA and IEPA. Confirmatory testing shall include testing the air in the basement of concern with a FID analyses using an organic vapor analyzer with a practical quantitation limit of 100 ppm (e.g. a Foxboro OVA), supported by CGI analyses using a catalytic bead sensor (e.g. a MSA 62S).

Respondents shall construct the combustible gas ventilation system in accordance with the procedures and schedule included in this Second Amendment and the U.S. EPA approved Ventilation system Design Document for the building. The Respondents shall monitor and continuously operate and maintain the ventilation system in accordance with this Second Amendment, U.S. EPA

approved Ventilation System Operation and Maintenance Plan and Design Document for this building.

2. Monitoring and response in other buildings

At least once per month the basements and crawl spaces of all other buildings located south of Sunset Ave./Golf Road, north of the Landfill, east of Yeoman Creek, and west of Butrick Road shall be monitored for combustible gases using an explosimeter and a flame ionization detector in accordance with the procedures previously approved for the RI/FS. This monitoring shall continue until termination of this Consent Order, unless otherwise agreed to in writing by the parties to this Consent Order. If this monitoring indicates that combustible gases are entering the basement or crawl space of any of these buildings, then the Respondents shall design, construct, operate and maintain a ventilation system for that crawl space or basement to meet the criteria identified above, and in accordance with a U.S. EPA approved Design Document and O&M Plan for that building. Respondent shall submit the design document for the building of concern within 30 days of detection of combustible gases entering the building in excess of the performance standard specified in paragraph (b) above.

B. Design Document and Operation and Maintenance Plan

1. Ventilation system.

The Respondents shall prepare a Design Document and Operation and Maintenance Plan for construction, operation, maintenance, and

monitoring of a ventilation system in each basement of the 1401-1451 Golf Road building, in addition to the basements and crawl spaces in which the future monitoring indicates that combustible gases may be entering, if any. The Design document shall provide an overview of design including the sizes, flow rates and general specification for the equipment and construction. The design document shall also provide a schedule for the installation.

The Design Document shall demonstrate that the Removal Action shall meet all objectives for the ventilation system defined in the Second Amendment. The Respondents shall consult as necessary with U.S. EPA to discuss design issues.

The Design Document and Operation and Maintenance Plan shall be subject to review, modification, approval or disapproval of U.S. EPA, in consultation with IEPA.

In the event of disapproval of all or part of the Design Document or Operation and Maintenance Plan, U.S. EPA shall specify, in writing any deficiencies and required modifications. Respondents shall submit a revised Design Document or Operation and Maintenance Plan, as appropriate, within 21 calendar days of receipt of U.S. EPA's disapproval. Once approved or approved with modifications, the Design Document, the Operation and Maintenance Plan, the schedule, and any subsequent modifications shall be fully enforceable under this Consent Order.

C. Inspections, Meetings, and Reports

Except as noted, the following inspections, meetings and reports shall be conducted for construction of the ventilation system:

1. Prefinal inspection.

The Respondents shall notify the U.S. EPA and IEPA for the purposes of conducting a prefinal inspection. The prefinal inspection shall consist of a walk-through inspection of the entire Facility with U.S. EPA. The inspection is to determine whether the project is complete and consistent with the contract documents and the Removal Action. Any outstanding construction items discovered during the inspection shall be identified and noted. The Respondents shall certify that the equipment has performed to meet the purpose and intent of the specifications. Retesting shall be completed where deficiencies are revealed. U.S. EPA, in consultation with IEPA, shall prepare a prefinal inspection report and shall outline the outstanding construction items, actions required to resolve items, completion date for these items, and a proposed date for final inspection.

2. Final inspection.

U.S. EPA, in consultation with IEPA, shall conduct a final inspection of the construction to verify that all outstanding construction items identified in the prefinal inspection have been addressed. The final inspection shall consist of a walk-through inspection of the Facility by U.S. EPA and the Respondents. The prefinal inspection report shall be used as a

checklist with the final inspection focusing on the outstanding construction items identified in the prefinal inspection. The Respondents shall have resolved outstanding items from the Prefinal Inspection to U.S. EPA's satisfaction. IEPA shall be notified of the result of the final inspection, if they do not participate.

3. Construction Completion Report:

Within 30 calendar days of a successful final inspection, Respondents shall submit a Construction Completion Report to U.S. EPA and IEPA. In the report, a registered professional engineer and the Respondents' Project Coordinator shall state that the Removal Action has been constructed in accordance with the design and specifications. The written report shall include as built drawings signed and stamped by a professional engineer. The report shall also include a chronology and description of the actions performed, a listing of quantities and types of wastes removed from the site or stored on the site, all relevant paperwork accrued during the action for off-site disposal or collection and analysis of samples (manifests, permits, laboratory data packages). The report shall contain the following statement, signed by a responsible corporate official of a Respondent or the Respondents' Project Coordinator, on behalf of all Respondents:

"To the best of my knowledge, after thorough investigation, I certify that the information contained in or accompanying

this submission is true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

D. Schedule

The schedule for implementation of this project for the 1401-1451 Golf Road Building is shown on the following table. The Schedule for installation at other building (if necessary) are as indicated in this Second Amendment and as established in the USEPA Approved Design Document for that building.

Task	Deadline (date or calendar days)
Submit Design Document to U.S. EPA and IEPA for the detection and ventilation system at 1401-1451 Golf Road	Complete
Submit Design Document to U.S. EPA and IEPA for ventilation system in crawl spaces or basements, in which future monitoring indicates that combustible gases may be entering	Complete.
Submit Revised Design Document for any of the above to U.S. EPA and IEPA addressing deficiencies and required modifications identified in writing by U.S. EPA	December 15, 1993
Complete construction, submission of the final Operation and Maintenance Plan, and prefinal inspection of the system for ventilation at 1401-1451 Golf Road or, if necessary, at other locations	90 days from receipt of letter from U.S. EPA approving the Design Document
Complete any outstanding construction items identified during the prefinal inspection and complete final inspection for any ventilation system	30 days from the prefinal inspection
Start-up of the ventilation system	24 hours after prefinal inspection
Submit Construction Completion Report to U.S. EPA and IEPA	30 days from final inspection
Operation and maintenance of the ventilation system	From the initial start up until construction and initial operation by any party or parties, of a final remedy for the site

VII. REIMBURSEMENT OF COSTS

Respondents shall reimburse costs not inconsistent with the National Contingency Plan incurred by the U.S. EPA and IEPA as provided in the Initial Consent Order, Section XXIV. Respondents do not, by agreeing to reimburse such costs in this instance,

admit that such costs are costs of "response" as defined by CERCLA. Respondents retain the right to contest the recoverability of any other costs USEPA and IEPA may incur to oversee the performance of any future response actions other than those required under the Consent Order, as amended.

VIII. STIPULATED PENALTIES

The Respondents shall be liable for stipulated penalties as provided in Section XVIII of the Initial Consent Order for each day that Respondents fail to commence work, submit a document or comply with a schedule in accordance with the requirements contained in the Consent Order, as amended.

IX. EFFECTIVE DATE

Pursuant to Section XXVII of the Initial Consent Order, this Second Amendment shall be effective, after signature by the parties thereto with U.S. EPA as final signatory, on the date that U.S. EPA sends notification that this amendment is effective, in writing, to the parties hereto.

X. TERMINATION

The provisions of the Second Amendment shall terminate when the Initial Consent Order terminates pursuant to Section XXIX, unless otherwise agreed to by the Parties hereto, except that the Respondents agree to continue operation and maintenance of the ventilation system beyond termination of this Consent Order until

construction and initial operation by any party or parties, of a final remedy for the site.

IT IS SO AGREED:

Respondents:

By: Dale T. Vitale 1/17/94
Date

Name of Signatory: DALE T. VITALE

Title: COUNSEL ENVIRONMENTAL LAW

Respondent: OUTBOARD MARINE CORP.

Address: 100 SEA HORSE DR.; WAUKEGAN, IL 60085

By: _____
Date

Name of Signatory: _____

Title: _____

Respondent: _____

Address: _____

By: _____
Date

Name of Signatory: _____

Title: _____

Respondent: _____

Address: _____

construction and initial operation by any party or parties, of a final remedy for the site.

IT IS SO AGREED:

Respondents:

By: Alan S. Brown 1/18/04
Date

Name of Signatory: ALAN S. BROWN

Title: SUPT.

Respondent: WAKEGAN DIST CO

Address: 1701 N. SHERIDAN RD. WAKEGAN IL 60085

By: _____ Date

Name of Signatory: _____

Title: _____

Respondent: _____

Address: _____

By: _____ Date

Name of Signatory: _____

Title: _____

Respondent: _____

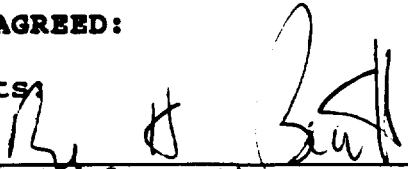
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construction and initial operation by any party or parties, of a final remedy for the site.

IT IS SO AGREED:

Respondents

By:

 December 9 1993
The Dexter Corporation Date

Name of Signatory: Bruce H. Beatt

Title: Vice President, General Counsel and Secretary

Respondent: The Dexter Corporation

Address: One Elm Street, Windsor Locks, CT 06096

By:

_____ Date

Name of Signatory: _____

Title: _____

Respondent: _____

Address: _____

By:

_____ Date

Name of Signatory: _____

Title: _____


Respondent: _____

Address: _____

construction and initial operation by any party or parties, of a final remedy for the site.

IT IS SO AGREED:

Respondents:

By:  12-29-93
Date
Name of Signatory: WILLIAM F. DURKIN
Title: MAYOR
Respondent: CITY OF WAUKEGAN, ILLINOIS
Address: WAUKEGAN, ILLINOIS

By: _____
Date
Name of Signatory: _____
Title: _____
Respondent: _____
Address: _____

By: _____
Date
Name of Signatory: _____
Title: _____
Respondent: _____
Address: _____

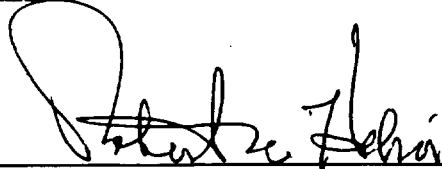
Signature Page, In Re Yeoman Creek Landfill Facility, Second Amendment, AOC, RI/FS
The Goodyear Tire & Rubber Company

construction and initial operation by any party or parties, of a
final remedy for the site.

IT IS SO AGREED:

Respondents;

By:

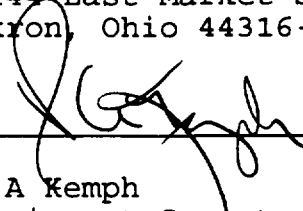


November 29, 1993

R M Hehir
Vice President

The Goodyear Tire & Rubber Company
1144 East Market Street
Akron, Ohio 44316-0001

Attest:



P A Kempf
Assistant Secretary

SEND ALL NOTICES TO:

Neal T. Rountree, Attorney
The Goodyear Tire & Rubber Company
1144 East Market Street
Akron, Ohio 44316-0001

Telephone (216) 796-3737
Telecopier (216) 796-8836

IT IS SO ORDERED AND AGREED:

Illinois Environmental Protection Agency:

By: Mary A. Gade 10/5/94

Mary Gade, Director
Illinois Environmental Protection Agency
2200 Churchill Road, P.O. Box 19276
Springfield, Illinois 62794-9276

Date

United States Environmental Protection Agency

By: Wm. E. Muno 10/17/94

William E. Muno, Director
Waste Management Division
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Effective Date: _____, 1993

Re: Yeoman Creek Landfill Facility
Second Amendment to Consent Order
Lake County, Waukegan, Illinois