

May 5, 2009

Mr. Richard McGill
Illinois Pollution Control Board
100 West Randolph Board
Suite 11-500
Chicago, Illinois 60601

RE: **Case No:** R2009-009
Case Type: Rulemaking
Media Type: Land
County: Statewide
Case Name: In the Matter of: Proposed Amendments to Tiered
Approach to Corrective Action Objectives (35 Ill Adm. Code 742)
Board Member: Johnson, T.E.
Hearing Officer: McGill, R.
Status: Board Order

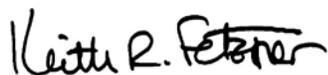
Dear Mr. McGill:

Environmental Resources Management, Inc. (ERM) prepared this letter to comment on the subject case.

It appears that the TACO equations J&E 1 and J&E 2 are not consistent with the USEPA's equations because they do not include exposure time (ET) (*8 hr/24 hr for industrial-commercial worker or 24 hr/24 hr for residential*) in the denominator. Omission of this value in the industrial-commercial worker calculation will result in TACO Tier 2 indoor air remediation objectives that are lower than the USEPA worker ambient air screening values. In essence it allows the calculation of only residential remediation objectives.

It is not clear if this is an oversight or intentional. If you have any questions, please feel free to contact me directly at 847-258-8983.

Sincerely,



Keith R. Fetzner, P.G.
Senior Project Manager