

ORIGINAL

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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MAR 15 2001

STATE OF ILLINOIS
Pollution Control Board

IN THE MATTER OF:)
)
SITE REMEDIATION PROGRAM)
(AMENDMENTS TO 35 ILL.)
ADM. CODE 740))

R01-27
(Rulemaking - Land)

IN THE MATTER OF:)
)
SITE REMEDIATION PROGRAM)
PROPOSED 35 ILL. ADM. CODE)
740.SUBPART H (SCHOOLS, PUBLIC)
PARKS AND PLAYGROUNDS))

R01-29
(Rulemaking - Land)
(Consolidated)

P.C.#1

NOTICE OF FILING

Dorothy Gunn, Clerk
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James R. Thompson Center
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Chicago, Illinois 60601

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Robert Lawley, Chief Legal Counsel
Department of Natural Resources
524 South Second Street
Springfield, Illinois 62701-1787

Attached Service List

PLEASE TAKE NOTICE that today I have filed with the Office of the Clerk of the Pollution Control Board the Illinois Environmental Protection Agency's Agency's Motion to Amend Original Agency Proposal and Testimony of Gregory W. Dunn Supporting Agency's Proposed Revisions to Section 740.415(d)(3), a copy of each of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: Mark Wight
Mark Wight
Assistant Counsel

DATE: March 13, 2001

1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

THIS FILING IS SUBMITTED ON RECYCLED PAPER

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AGENCY'S MOTION TO AMEND ORIGINAL AGENCY PROPOSAL

THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ("Illinois EPA"), pursuant to 35 Ill. Adm. Code 102.401 and 101.Subpart E, moves that the Illinois Pollution Control Board ("Board") accept the additional proposed amendment in the above-captioned rulemaking.

In support of this motion, the Illinois EPA states as follows:

The Illinois EPA has, in this proceeding before the Board, proposed amendments to 35 Ill. Adm. Code 740: Site Remediation Program. The primary purpose of the amendments is to clarify and refine certain provisions based on the Illinois EPA's experience in administering the rules since their adoption by the Board in 1997. To accomplish this purpose, the Illinois EPA believes that further adjustments to its original proposal are necessary and desirable. The additional proposed amendment is attached hereto.

At Section 740.415(d)(3) the Illinois EPA proposes to revise its original proposed amendment. Upon further consideration, the Illinois EPA believes that its original proposed amendment does not sufficiently clarify what is expected of participants in the Site Remediation Program ("SRP") with regard to the practical quantitation limits of test methods.

The newly proposed amendment is necessary to improve the effectiveness of the SRP in ensuring that human health is protected at sites receiving comprehensive No Further Remediation Letters. The

rules are now open for amendment and may not be again for several years. The Board has not yet published the proposed amendments for first notice, so there is no procedural obstacle to accepting the additional amendments. For these reasons, the Illinois EPA respectfully requests that the Board accept the additional proposed amendments and supporting testimony as part of this Part 740 rulemaking.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY

By: Mark Wight
Mark Wight, Assistant Counsel

DATED: March 13, 2001

1021 North Grand Avenue East
P.O. Box 19276
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**ATTACHMENT ONE TO AGENCY'S MOTION TO AMEND:
AGENCY'S REVISED PROPOSED AMENDMENT TO SECTION 740.415(d)(3)**

*Single underline and strike-through indicate the original Agency proposal of January 10, 2001.
Double underline and strike-through indicate revisions proposed in the Agency's Motion to Amend.*

Section 740.415 Site Investigation -- General

A site investigation shall be performed under this Part to identify, as indicated within the RA's application for review and evaluation services, all or specified recognized environmental conditions existing at the remediation site, the related contaminants of concern, and associated factors that will aid in the identification of risks to human health, safety and the environment, the determination of remediation objectives, and the design and implementation of a Remedial Action Plan.

- a) If the RA has elected under the application for review and evaluation services to obtain a No Further Remediation Letter covering all recognized environmental conditions and related contaminants of concern for the remediation site, then the procedures provided under Sections 740.420 and 740.425 of this Part shall be followed.
- b) If the RA has elected under the application for review and evaluation services to obtain a No Further Remediation Letter covering a limited number of recognized environmental conditions and related contaminants of concern as specified by the RA, then the procedures at Sections 740.430 and 740.435 of this Part shall be followed.
- c) The RA may revise an election at anytime by initiating a modification of the Review and Evaluation Services Agreement under Section 740.220 of this Part and performing the appropriate site investigation, if necessary.
- d) Site investigations shall satisfy the following data quality objectives for field and laboratory operations to ensure that all data is scientifically valid and of known precision and accuracy:
 - 1) All field sampling activities relative to sample collection, documentation, preparation, labeling, storage, shipment and security, quality assurance and quality control, acceptance criteria, corrective action, and decontamination procedures shall be conducted in accordance with "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846), Vol. One, Ch. One (Quality Control) and Vol. Two (Field Manual), incorporated by reference at Section 740.125 of this Part. If approved by the Agency, such activities also may be conducted in accordance with ASTM standards, methods identified in "A Compendium of Superfund Field Operations Methods" (EPA/540/0-87-001, OSWER Directive 9355.0-14, December 1987), "Subsurface Characterization and Monitoring Techniques: A Desk Reference Guide, Volume I: Solids and Ground Water, Appendices A and B" (EPA/625/R-93/003a, May 1993), "Subsurface Characterization and Monitoring Techniques: A Desk Reference Guide, Volume II: The Vadose Zone, Field Screening and Analytical Methods, Appendices C and D" (EPA/625/R-93/003b, May 1993), or other procedures.

- 2) All field measurement activities relative to equipment and instrument operation, calibration and maintenance, corrective action, and data handling shall be conducted in accordance with "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846), Vol. One, Ch. One (Quality Control), incorporated by reference at Section 740.125 of this Part, or with an equipment or instrument manufacturer's or vendor's published standard operating procedures.
- 3) All laboratory quantitative analysis of samples to determine concentrations of regulated substances or pesticides shall be conducted fully in accordance with "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846), incorporated by reference at Section 740.125 of this Part, relative to all facilities, equipment and instrumentation, operating procedures, sample management, test methods, equipment calibration and maintenance, quality assurance and quality control, corrective action, data reduction and validation, reporting, and records management. The practical quantitation limit (PQL) of the test methods selected must be less than or equal to the most protective Tier 1 soil remediation objectives in 35 Ill. Adm. Code 742. Appendix B, ~~for residential properties~~, applicable groundwater remediation objectives under 35 Ill. Adm Code 742. Appendix B, or, if already determined, PQL for the Target Compound List at Appendix A of this Part, or, if the site remediation objective concentrations have been determined, the PQL must be less than or equal to the remediation objective concentrations for the site. If a contaminant of concern is not identified in Part 742 or the remediation objectives for the site have not been determined, the PQL shall equal the lowest concentration that reliably can be achieved within specified limits of precision and accuracy during routine laboratory operating conditions but shall not be greater than ten (10) times the method detection limit.
- 4) All field or laboratory measurements of samples to determine physical or geophysical characteristics shall be conducted in accordance with ASTM standards or other procedures as approved by the Agency.
- 5) All laboratory quantitative analyses of samples to determine concentrations of any regulated substances or pesticides that require more exacting detection limits or cannot be analyzed by standard methods identified in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846), incorporated by reference at Section 740.125 of this Part, shall be conducted in accordance with analytical protocols developed in consultation with and approved by the Agency.
- 6) Effective July 1, 2002, all quantitative analyses of samples collected on or after that date and utilizing any of the approved test methods identified in 35 Ill. Adm. Code 186.180 shall be completed by an accredited laboratory in accordance with the requirements of 35 Ill. Adm. Code 186. Quantitative analyses not utilizing an accredited laboratory in accordance with Part 186 shall be deemed invalid.

(Source: Amended at ___ Ill. Reg. _____, effective _____.)

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TESTIMONY OF GREGORY W. DUNN SUPPORTING AGENCY'S PROPOSED
REVISION TO SECTION 740.415(d)(3) AS ATTACHED TO AGENCY'S MOTION
TO AMEND

My name is Gregory W. Dunn. I am currently manager of one of the Site Remediation Program Units of the Bureau of Land of the Illinois Environmental Protection Agency (Agency). The Site Remediation Program (SRP), as established under 35 Ill. Adm. Code 740, provides Remediation Applicants (property owners, developers, bankers, real estate agents, businesses, etc.) the opportunity to receive review and evaluation services, technical assistance, and no further remediation determinations from the Agency.

I graduated from Eastern Illinois University in 1986 with a B.S. in Geology and a B.S. in Earth Science. I have been employed with the Agency since September 1986. I was a project manager in the Site Assessment Unit from September 1986 until October 1992. From October 1992 until July 1997, I was a project manager in the Pre-Notice

Program, which became the Site Remediation Program in June 1997. From July 1997 until December 1998, I was a project manager in the State Sites Unit, which uses State funds to remediate sites. Since December 1998, I have been manager of one of the Site Remediation Program units. I am registered as a Licensed Professional Geologist in the State of Illinois.

Today I will testify in support of a proposed rule change in 35 Ill. Adm. Code 740 concerning the reworking of language in 740.415(d)(3) and the deletion of the practical quantitation limits in Appendix A. The Agency proposed amendments to Section 740.415(d)(3) in its original proposal submitted to the Pollution Control Board (Board) on January 10, 2001, and accepted by the Board for hearing on February 5, 2001. However, the Agency subsequently concluded that the original language proposed for Section 740.415(d)(3) needed further clarification. It requested at the hearing on February 28, 2001, that oral testimony and questions on this Section be deferred until the second hearing on April 4, 2001. The Agency submitted the clarifying language to the Board in a Motion to Amend dated March 13, 2001. This testimony is in support of that clarifying language and the corresponding changes to Appendix A.

Screening for Hazardous Substances and the Target Compound List:
(Section 740.415(d)(3); Appendix A, Tables A - D)

The Site Remediation Program uses the United States Environmental Protection Agency's Target Compound List as a representation of the hazardous substances most commonly found at remediation sites. The Target Compound List is found in Appendix

A of Part 740. Under certain circumstances, the Target Compound List provides a basis for initial screening for the presence of hazardous substances. It is not intended to determine if the site has met remediation objective concentrations established in Part 742. Rather, if the presence of hazardous substances is revealed based on the screening concentrations, the substances become contaminants of concern and must be remediated to Tier 1, Tier 2 or Tier 3 remediation levels. The Target Compound List is not used for focused site investigations but may be used as a supplement for sites undergoing comprehensive site investigations.

Section 740.415(d)(3) provides that all laboratory quantitative analyses shall be conducted using SW-846 Methods as incorporated by reference at Section 740.125. The current language in Section 740.415(d)(3) states that the Practical Quantitation Limit (PQL) "of the test methods selected must be less than or equal to the PQL of the Target Compound List at Appendix A of this Part, or, if the site remediation objective concentrations have been determined, the PQL must be less than or equal to the remediation objective concentrations for the site."

Based on this provision, one could sample for the Target Compound List parameters and meet the required quantitation limits (RQL) as identified in Appendix A, but potentially have a site that is not protective of human health or the environment. This may occur if the compound is identified during the screening process at a concentration below the RQL value but above the Tier 1 or site-specific remediation objective. The screening procedure allows the RA to treat the compound as if it is not present at the site.

However, the RQLs for at least thirty-eight compounds identified in Appendix A are above the ingestion, soil migration to groundwater, or groundwater remediation objectives as established in Tier 1 of 35 Ill. Adm. Code 742 or in 35 Ill. Adm. Code 620. See Attachment 1. Twenty-eight of these thirty-eight compounds are identified as potential carcinogens in the Tier 1 tables. If these hazardous substances are eliminated as contaminants of concern based on the higher screening levels of the RQLs, an unrestricted, comprehensive NFR Letter could be obtained with these compounds remaining at the site at concentrations above those that would be allowed under Part 742.

The language proposed by the Agency in its original proposal of January 10, 2001 stated: "The practical quantitation limit (PQL) of the test methods selected must be less than or equal to the Tier 1 soil remediation objectives for residential properties, applicable groundwater remediation objectives in 35 Ill. Adm. Code 742 Appendix B, or, if already determined, the remediation objective concentrations for the site." However, this language leaves two problems because it does not address the nine compounds that have construction worker inhalation objectives lower than the residential objectives (see Attachment 2) or the forty-one compounds that are not identified in 35 Ill. Adm. Code Part 742. (See Attachment 3.)

As an example of the first problem, toluene has a construction worker inhalation objective of 42 mg/kg. If the screening level were the residential Tier 1 soil objective as in the Agency's original proposed amendment, toluene might not be identified as a contaminant of concern because the residential inhalation objective is 650 mg/kg. This

would allow toluene to remain at the site at levels posing a threat in the construction worker scenario even though the site had been issued an unrestricted, comprehensive No Further Remediation Letter. In the case of the forty-one compounds not identified in Part 742 tables, the problem created by the Agency's original proposal is that there is no alternative to Appendix A for establishing the practical quantitation limit short of calculating site-specific remediation objectives, a step that may be premature at the site investigation stage.

Therefore, the Agency proposes new language to address the original problem of PQLs that are too high for screening values as well as the problems left unaddressed by the Agency's first proposed amendments to Section 740.415(d)(3). The new language is: "The practical quantitation limit (PQL) of the test methods selected must be less than or equal to the most protective Tier 1 soil remediation objectives in 35 Ill. Adm. Code 742.Appendix B, applicable groundwater remediation objectives in 35 Ill. Adm. Code 742.Appendix B, or, if already determined, the remediation objective concentrations for the site. If a contaminant of concern is not identified in Part 742 or the remediation objectives for the site have not been determined, the PQL shall equal the lowest concentration that reliably can be achieved within specified limits of precision and accuracy during routine laboratory operating conditions, but shall not be greater than ten (10) times the method detection limit." This revision will make the screening values for hazardous substances on the Target Compound List protective of all uses by ensuring that hazardous substances in concentrations above the most protective Part 742 objectives are

identified as contaminants of concern and that no hazardous substances remain on site above the Tier 1, Tier 2 or Tier 3 levels appropriate for the site.

As noted above, the proposed amendment at Section 740.415(d)(3) also requires the amendment of Appendix A, Tables A through D. The Agency proposes to delete the water and soil RQLs and the statement concerning RQLs located below each table in Appendix A. The screening values then would be as provided in amended Section 740.415(d)(3) as discussed previously. Appendix A tables would contain only the CAS number, the compound name and the method used to analyze a particular compound.

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ATTACHMENT 1

Compounds with Objectives Below the 740.Appendix A RQLs

<u>Compound</u>	<u>Objective</u>	<u>Route</u>	<u>740 Appendix A Required Quantitation Limit (RQL)</u>
Bromomethane	9.8 ug/l	Class I Groundwater	10 ug/l
Vinyl Chloride	2.0 ug/l	Class I Groundwater	10 ug/l
Methylene Chloride	5.0 ug/l	Class I Groundwater	10 ug/l
1,1-Dichloroethylene	7.0 ug/l	Class I Groundwater	10 ug/l
Chloroform	0.2 ug/l	Class I Groundwater	10 ug/l
Chloroform	1.0 ug/l	Class II Groundwater	10 ug/l
1,2-Dichloroethane	5.0 ug/l	Class I Groundwater	10 ug/l
Carbon Tetrachloride	5.0 ug/l	Class I Groundwater	10 ug/l
Bromodichloromethane	0.2 ug/l	Class I Groundwater	10 ug/l
Bromodichloromethane	0.2 ug/l	Class II Groundwater	10 ug/l
1,2-Dichloropropane	5.0 ug/l	Class I Groundwater	10 ug/l
cis-1,3-Dichloropropane	5.0 ug/kg	Soil Migration to Groundwater - Class I	10 ug/kg
cis-1,3-Dichloropropane	1.0 ug/l	Class I Groundwater	10 ug/l
cis-1,3-Dichloropropane	5.0 ug/l	Class II Groundwater	10 ug/l
Trichloroethene	5.0 ug/l	Class I Groundwater	10 ug/l
1,1,2-Trichloroethane	5.0 ug/l	Class I Groundwater	10 ug/l
Benzene	5.0 ug/l	Class I Groundwater	10 ug/l
trans-1,3-Dichloropropane	5.0 ug/kg	Soil Migration to Groundwater - Class I	10 ug/kg
trans-1,3-Dichloropropane	1.0 ug/l	Class I Groundwater	10 ug/l
trans-1,3-Dichloropropane	5.0 ug/l	Class II Groundwater	10 ug/l
Bromoform	1.0 ug/l	Class I Groundwater	10 ug/l
Bromoform	1.0 ug/l	Class II Groundwater	10 ug/l
Tetrachloroethene	5.0 ug/l	Class I Groundwater	10 ug/l
Hexachloroethane	7.0 ug/l	Class I Groundwater	10 ug/l
Nitrobenzene	3.5 ug/l	Class I Groundwater	10 ug/l
Nitrobenzene	3.5 ug/l	Class II Groundwater	10 ug/l

ATTACHMENT 1 (cont.)

Compounds with Objectives Below the 740.Appendix A RQLs

<u>Compound</u>	<u>Objective</u>	<u>Route</u>	<u>740 Appendix A Required Quantitation Limit (RQL)</u>
2,6-Dinitrotoluene	260 ug/kg	Soil Migration to Groundwater - Class I	660 ug/kg
2,6-Dinitrotoluene	260 ug/kg	Soil Migration to Groundwater - Class II	660 ug/kg
2,6-Dinitrotoluene	0.31 ug/l	Class I Groundwater	10 ug/l
2,6-Dinitrotoluene	0.31 ug/l	Class II Groundwater	10 ug/l
2,4-Dinitrophenol	14 ug/l	Class I Groundwater	25 ug/l
2,4-Dinitrophenol	14 ug/l	Class II Groundwater	25 ug/l
2,4-Dinitrotoluene	250 ug/kg	Soil Migration to Groundwater - Class I	660 ug/kg
2,4-Dinitrotoluene	250 ug/kg	Soil Migration to Groundwater - Class II	660 ug/kg
2,4-Dinitrotoluene	0.02 ug/l	Class I Groundwater	10 ug/l
2,4-Dinitrotoluene	0.02 ug/l	Class II Groundwater	10 ug/l
Hexachlorobenzene	0.06 ug/l	Class I Groundwater	10 ug/l
Hexachlorobenzene	0.3 ug/l	Class II Groundwater	10 ug/l
Pentachlorophenol	30 ug/kg	Soil Migration to Groundwater - Class I	1600 ug/kg
Pentachlorophenol	140 ug/kg	Soil Migration to Groundwater - Class II	1600 ug/kg
Pentachlorophenol	1.0 ug/l	Class I Groundwater	25 ug/l
Pentachlorophenol	5.0 ug/l	Class II Groundwater	25 ug/l
Carbazole	600 ug/kg	Soil Migration to Groundwater - Class I	660 ug/l
Benzo(a)anthracene	0.13 ug/l	Class I Groundwater	10 ug/l
Benzo(a)anthracene	0.65 ug/l	Class II Groundwater	10 ug/l
Chrysene	1.5 ug/l	Class I Groundwater	10 ug/l
Chrysene	7.5 ug/l	Class II Groundwater	10 ug/l
bis(2-ethylhexyl)phthalate	6.0 ug/l	Class I Groundwater	10 ug/l
Benzo(b)fluoranthene	0.18 ug/l	Class I Groundwater	10 ug/l
Benzo(b)fluoranthene	0.9 ug/l	Class II Groundwater	10 ug/l
Benzo(k)fluoranthene	0.17 ug/l	Class I Groundwater	10 ug/l
Benzo(k)fluoranthene	0.85 ug/l	Class II Groundwater	10 ug/l

ATTACHMENT 1 (cont.)

Compounds with Objectives Below the 740 Appendix A RQLs

<u>Compound</u>	<u>Objective</u>	<u>Route</u>	<u>740 Appendix A Required Quantitation Limit (RQL)</u>
Benzo(a)pyrene	90 ug/kg	Ingestion (Residential)	660 ug/kg
Benzo(a)pyrene	0.2 ug/l	Class I Groundwater	10 ug/l
Benzo(a)pyrene	2.0 ug/l	Class II Groundwater	10 ug/l
Indeno(1,2,3-c,d)pyrene	0.43 ug/l	Class I Groundwater	10 ug/l
Indeno(1,2,3-c,d)pyrene	2.15 ug/l	Class II Groundwater	10 ug/l
Dibenzo(a,h)anthracene	90 ug/kg	Ingestion (Residential)	660 ug/kg
Dibenzo(a,h)anthracene	0.3 ug/l	Class I Groundwater	10 ug/l
Dibenzo(a,h)anthracene	1.5 ug/l	Class II Groundwater	10 ug/l
alpha-BHC	7.4 ug/kg	Soil Migration to Groundwater - Class I	8 ug/kg
Antimony	6.0 ug/l	Class I Groundwater	60 ug/l
Antimony	24.0 ug/l	Class II Groundwater	60 ug/l
Beryllium	4.0 ug/l	Class I Groundwater	5 ug/l
Thallium	2.0 ug/l	Class I Groundwater	10 ug/l
Vanadium	49.0 ug/l	Class I Groundwater	50 ug/l

ATTACHMENT 2

Compounds with Construction Worker Inhalation Objectives Below Residential Inhalation Objectives

<u>Compound</u>	<u>Construction Worker Inhalation Objective</u>	<u>Residential Inhalation Objective</u>
Bromomethane (Methyl Bromide)	3.9 mg/kg	10.0 mg/kg
Carbon Disulfide	9.0 mg/kg	720 mg/kg
1,1-Dichloroethane	130 mg/kg	1300 mg/kg
1,2-Dichloropropane	0.50 mg/kg	15.0 mg/kg
Toluene	42 mg/kg	650 mg/kg
Chlorobenzene	1.3 mg/kg	130 mg/kg
Ethylbenzene	58 mg/kg	400 mg/kg
Styrene	430 mg/kg	1500 mg/kg
1,2-Dichlorobenzene	310 mg/kg	560 mg/kg

ATTACHMENT 3

Compounds in Part 740. Appendix A With No Objective in Part 742

Chloromethane	Chloroethane
2-Butanone	Dibromochloromethane
4-Methyl-2-pentanone	2-Hexanone
1,1,2,2-Tetrachloroethene	1,3-Dichlorobenzene
2,2'Oxybis(1-chloropropane)	4-Methylphenol
2-Nitrophenol	bis(2-Chloroethoxy)methane
Hexachlorobutadiene	4-Chloro-3-methylphenol
2-Methylnaphthalene	2-Chloronaphthalene
2-Nitroaniline	Dimethylphthalate
Acenaphthalene	3-Nitroaniline
4-Nitrophenol	Dibenzofuran
4-Chlorophenyl-phenyl ether	4-Nitroaniline
4,6-Dinitro-2-methylphenol	4-Bromophenyl-phenyl ether
Phenanthrene	Di-n-butylphthalate
Benzo(g,h,i)perylene	beta-BHC
delta-BHC	Endosulfan I
Endosulfan II	Endosulfan Sulfate
Endrin Ketone	Endrin Aldehyde
Aluminum	Calcium
Magnesium	Potassium
Sodium	

STATE OF ILLINOIS)
)
COUNTY OF SANGAMON)

PROOF OF SERVICE

I, the undersigned, on oath state that I have served the attached Agency's Motion to Amend Original Agency Proposal and Testimony of Gregory W. Dunn Supporting Agency's Proposed Revisions to Section 740.415(d)(3) upon the persons to whom they are directed by placing copies in envelopes addressed to:

Dorothy Gunn, Clerk
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Attached Service List
(FIRST CLASS MAIL)

and mailing them from Springfield, Illinois on 3-13-01, with sufficient postage affixed as indicated above.

Melinda A Brandt

SUBSCRIBED AND SWORN TO BEFORE ME
this 13th day of March, 2001.

Brenda Boehner
Notary Public



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R01-27
February 21, 2001

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