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STATE OF ILLINOIS
Pollution Control Board

October 23, 2000

Dorothy Gunn, Clerk
Illinois Pollution Control Board
100 West Randolph, Suite 11-500
Chicago, Illinois 60601

R00-19(B)
P. e. #7



RE: R00-19 (B); request for separation of arsenic background level from rulemaking (Section 742. Appendix A: General, Table G. Concentration of Inorganic Chemicals in Background Soils)

Dear Ms. Gunn:

Regarding the above referenced Docket, we wish to voice our support for the separation of the Background Concentration Table from the rest of the Docket, which includes MTBE issues that require more review. In making this request we hope that you will move forward with the adoption of the new background level prior to the additional review for the rest of the Docket.

Research by our members show that the actual background level is often above the current 7.2 mg/kg but below the 13.0 mg/kg level suggested by the Illinois EPA. Our members have documented levels just above 11mg/kg in Palatine and Bensenville. These background levels are consistent through the soil profiles with no evidence that they may be due to atmospheric deposition or other anthropomorphic sources.

The current background levels have caused needless consumption of effort by individual landowners and consumption of Illinois EPA staff time in responding to Voluntary Cleanup requests for arsenic levels that are background level. The rapid passage of more accurate background levels for arsenic will allow environmental efforts to be more accurately focussed on contamination as opposed to natural levels of elements.

Sincerely,

Bruce Deason
Staff Vice President for Government Affairs