



**HOME BUILDERS ASSOCIATION OF ILLINOIS**

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**RECEIVED**  
CLERK'S OFFICE

OCT 25 2000

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**STATE OF ILLINOIS**  
**Pollution Control Board**

R00-19(B)  
P.C.#5



**LOUIS G. STEPHENS**  
*President*

October 23, 2000

**RAY BUDDÉ**  
*Sr. Vice President*

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

**JACKIE STREET**  
*First Vice President*

**CATHY KIRIN**  
*Second Vice President*

Dear Ms. Gunn;

**ED BRADY**  
*Treasurer*  
*National Director*

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)

**SHAWN LUESSE**  
*Secretary*  
*Alt. National Director*

For the same reasons stated in the letter from the Green Environmental Group, Ltd.; dated October 23, 2000 (see attached), The Home Builders Association of Illinois supports the request for separation of the Background Concentration Table from the rest of the Docket.

**JOHN R. HALL, SR.**  
*Past President*

**MARSHA B. ELLIOTT**  
*NAHB National Rep*

**GORDON EHORN**  
*National Director*

We feel that the new proposed standards dealing with arsenic levels in the soil more accurately reflect the background levels for this area.

**DEBRA LENIUS**  
*Alt. National Director*

**J. MARK HARRISON**  
*Exec. Vice President*

Respectfully,

J. Mark Harrison  
Executive Vice President

Affiliated with



**NAHB**  
NATIONAL ASSOCIATION  
OF HOME BUILDERS



The Green Environmental Group, Ltd.  
Environmental Assessments & Consulting

October 23, 2000

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

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, I wish to voice my support for the separation of the Background Concentration Table from the rest of the Docket, which includes MTBE issues that require more review. I am requesting this separation in hopes of moving forward with the adoption of the new background level prior to the additional review necessary for the rest of the Docket.

We have found through sampling at several sites in Northeastern Illinois, 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. We have established average levels just above 11 mg/kg in both the Palatine area and Bensenville. I am also aware of other similar values that other consultants have obtained. These background levels are consistent through the soil profiles with no evidence that they may be due to atmospheric deposition or other anthropomorphic sources. To my knowledge, there have not been any comments dealing with the background levels of arsenic to date.

The current background levels, because they do not reflect the actual background levels of the Illinois soils, have caused a needless consumption of effort by individual landowners and a consumption of Illinois EPA staff time in responding to Voluntary Cleanup requests for arsenic levels that are background levels. The rapid passage of the more accurate background levels for arsenic will allow environmental efforts to be more accurately focused on contamination as opposed to natural levels of elements.

Sincerely,

William W. Frerichs, Principal  
The Green Environmental Group, Ltd.

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