



# DRYCLEANER

ENVIRONMENTAL RESPONSE  
TRUST FUND OF ILLINOIS

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APR 26 2004

STATE OF ILLINOIS  
Pollution Control Board

April 23, 2004

Michael J. McCambridge  
Staff Attorney  
Illinois Pollution Control Board  
100 W. Randolph 11-500  
Chicago, IL 60601

RE: Recommended Addition to the following:  
Docket R04-16: Illinois Register - April 23, 2004  
Proposed Rules: Pollution Control Board - ILRti35\pt739  
Used Oil Management Standards

PC #1

Dear Mr. McCambridge:

Professional geologists deal with the handling, transport, and disposal of the hazardous waste generated at leaking underground storage tank sites, drycleaner facilities, industrial sites, commercial facilities, etc. on a daily basis. Geologists are well known to provide many of the same services that a professional engineer performs within the environmental industry and some services that professional engineers do not provide. As a note, a significant part of the education and training that a geologist receives includes chemistry, environmental engineering, and OSHA hazardous material health and safety issues.

It is recommended that the below portion of Docket R04-16 Proposed Rules be modified as indicated in **bold** to include "professional geologist" as having the type of professional skills necessary for compliance.

12) Initial regulatory flexibility analysis:

C) Types of professional skills necessary for compliance: Compliance with the existing rules and proposed amendments may require the services of an attorney, certified public accountant, chemist, **professional geologist**, and registered professional engineer.

I would be happy to discuss this issue with you in greater detail and if you have any questions, please call 630-741-0022.

Sincerely,

C. Michael Perkins, LPG, CPG, CHMM  
Environmental Project Manager