

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
PROPOSED AMENDMENTS TO CLEAN) R12-009
CONSTRUCTION OR DEMOLITION) (Rulemaking – Land)
DEBRIS (CCDD) FILL OPERATIONS:)
PROPOSED AMENDMENTS TO 35 Ill.)
Adm. Code 1100)

NOTICE OF FILING

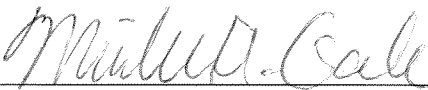
TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board the Pre-Filed Questions of John E. Hock, James E. Huff and Gregory Wilcox Submitted by Waste Management of Illinois, Inc., copies of which are herewith served upon you.

Dated: October 17, 2011

Respectfully submitted,

**WASTE MANAGEMENT OF
ILLINOIS, INC.**

By: 
Michelle A. Gale
Waste Management
720 East Butterfield Road
Lombard, Illinois 60148
(630) 572-8800

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**PRE-FILED QUESTIONS OF JOHN E. HOCK, JAMES E. HUFF AND GREGORY WILCOX
SUBMITTED BY WASTE MANAGEMENT OF ILLINOIS, INC.**

WASTE MANAGEMENT OF ILLINOIS, INC. hereby files, in accordance with the Hearing Officer Order issued on August 15, 2011, its questions for John E. Hock, P.E., of Civil & Environmental Consultants, Inc. (CEC) representing the Illinois Association of Aggregate Producers, James E. Huff, P.E., of Huff & Huff, Inc., representing a number of governmental authorities responsible for transportation infrastructure, and Gregory Wilcox, representing Land Reclamation & Recycling Association.

Questions for John E. Hock

1. How many CCDD fill sites are currently operating?
2. How many of these sites did CEC do borings at and collect samples from?
3. How many soil fill sites are currently operating?
4. How many soil fill sites did CEC do borings at and collection samples from?
5. Is it true that Public Act 96-1416 will likely result in more soil from remediation projects being disposed of at CCDD and fill sites than at landfills?
6. How many CCDD sites have installed groundwater monitoring systems?
7. How many soil fill sites have installed groundwater monitoring systems?
8. Without an active monitoring system at these sites, isn't it impossible to know whether these sites have impacted the groundwater in the past?

Questions for James E. Huff

1. Other than the one CCDD facility where monitoring wells were installed, as indicated on pages 4-6 of your testimony, are you aware of any other CCDD or soil fill site where groundwater monitoring has taken place?
2. Isn't your testimony that TACO can be applied to the management of contamination at CCDD sites (page 4 of your testimony) inconsistent with the Board's December 4, 1997 Opinion and Order in the TACO rulemaking (R97-12B)?
3. Are you aware of any CCDD or soil fill sites that have accepted waste in violation of the Environmental Protection Act?

Questions for Gregory Wilcox

1. Doesn't the Lynwood site's acceptance of waste substantiate the Agency's recommendation that CCDD and soil fill operations have groundwater monitoring programs?
2. Isn't it true that CCDD sites other than the Lynwood site have accepted waste in violation of the Environmental Protection Act?

Dated: October 17, 2011

Respectfully submitted,

**WASTE MANAGEMENT OF
ILLINOIS, INC.**

By: 

Dennis M. Wilt
Waste Management
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Lombard, Illinois 60148
(630) 218-1690

PROOF OF SERVICE

I, Michelle A. Gale, certify that I have served the attached Notice of Filing and Pre-Filed Questions of John E. Hock, James E. Huff and Gregory Wilcox Submitted by Waste Management of Illinois, Inc., on October 17, 2011 to the following by the methods indicated:

By electronic mail:	
John Therriault, Clerk Illinois Pollution Control Board James R. Thompson Center 100 West Randolph Street, Suite 11-500 Chicago, IL 60601 therriaj@ipcb.state.il.us	Marie Tipsord, Hearing Officer Illinois Pollution Control Board James R. Thompson Center 100 W. Randolph St., Suite 11-500 Chicago, IL 60601 tipsorm@ipcb.state.il.us
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Michelle A. Gale