



*Electronic Filing - Received, Clerk's Office, 10/07/2011*  
*Association of Environmental and Engineering Geologists, North Central Section*

*c/o Kevin S. Richards, 2011 AEG-NC Chair*  
*1530 Willow St.*  
*Lake Forest, IL 60045*

October 7, 2011

Illinois Pollution Control Board  
1021 North Grand Avenue East  
PO Box 19274  
Springfield, Illinois 62794-9274

*PC#2*

Re: Proposed Amendments to Clean Construction or Demolition Fill Operations (35 ILL. ADM. Code 1100) R2012-09 (Rulemaking-Land)

Dear Board Members,

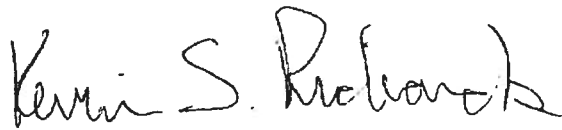
I represent the Association of Environmental and Engineering Geologists, North Central Section as current Chair of the Section. The Section has about 200 current members and represents the northern half of Illinois, all of Wisconsin, Michigan, Minnesota and portions of Iowa, Indiana and Ohio. I am both a licensed Professional Engineer and Professional Geologist in the State of Illinois and have been practicing here since 1990. My background with the U.S. Army Corps of Engineers provided me a unique frame of reference for the proposed regulations to use CCDD in quarries and mines. I worked for the U.S. Army Corps of Engineers from 1990 through 1998 and was hired to develop a geologic/hydrogeologic site characterization plan for the proposed Cup McCook Reservoir, a combined sewer overflow reservoir to be constructed in the McCook Quarry. In this capacity, I developed an overall site characterization plan, prepared the scopes of work for the geologic/geotechnical investigations, evaluated the subsequent data obtained from these studies to develop the geologic and hydrogeologic framework for the area, performed groundwater modeling studies, and developed preliminary plans for the protection of groundwater resources around this large quarry.

I am concerned with Subpart G of the proposed rules. In particular, if a monitoring plan is to be developed for clean fill operations in mined rock excavations, a Licensed Professional Geologist should be involved with certifying that the monitoring plan is suitable. Only a Licensed Professional Geologist has the proper State certification to be making these types of determinations, as bedrock hydrogeology requires knowledge in a number of specialized fields that only someone with a degree in geology would acquire.

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I concur with the IEPA opinion that short term monitoring be done at CCDD facilities, even though "certified" clean fill will be used in these facilities. A short, post-closure monitoring program will both protect the public and the operators of these facilities. Because the fill material has been certified as clean, the cost of these monitoring programs should be kept low. A Licensed Professional Geologist is best equipped to aid in the development of a low cost, but effective, monitoring plan at these types of facilities.

Sincerely,

A handwritten signature in black ink that reads "Kevin S. Richards". The signature is written in a cursive, flowing style.

Kevin S. Richards, Ph.D., P.E., L.P.G.  
2011 Chair - AEG North Central Section