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STATE OF ILLINOIS
Pollution Control Board

November 23, 2011

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Clerk of the Board
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

ORIGINAL

Re: Proposed Amendments to Clean Construction or Demolition
Debris (CCDD) Fill
Operations: Proposed Amendments to 35 Ill. Adm. Code 1100, R12-9
(Rule making – Land)

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Dear Board Members,

My name is Michael Stanczak and I am the Vice President of the North Region – Materials Midwest for Lehigh Hanson. We currently operate two permitted CCDD operations along with two more Clean Soil Facilities (CSF). Over the years our company has been instrumental helping to guide the CCDD legislation; however these proposed rules are going in the wrong direction.

The perfect home for CCDD is in a mined out quarry, this eases the stress on landfill space and serves a practical use in bringing the mined out quarries back to useable lands. There is also another benefit; generally trucks that haul CCDD to a quarry also back haul stone to the construction site, therefore there are fewer trucks on the roads and less air pollution emitted.

One problem we have is with the ground water monitoring requirements, several of our sites are located in urban industrial areas with background concentrations of contaminates in excess of the current proposed limits.

Also Section 1100.735 requires that monitoring be performed for all parameters which have a Class I groundwater standard in 35 IAC 620.410. The Class I list includes metals, radionuclides, other inorganic parameters, VOCs, SVOCs, pesticides/herbicides, and PCBs. Based on a laboratory quote, the estimated cost for analyzing for the entire Class I list is \$2,996 per sample. The cost for the four radionuclides (radium-226, radium-228, tritium and strontium-90) alone is \$820 per sample. These costs will be overly burdensome.

If the current proposed rules do not change and are put into effect, we will more than likely cease to operate our CCDD and CSF locations. The increased costs to operate as well as the risk to the Company will guide our decision to no longer be in the CCDD business.

Please heavily consider this request to change the CCDD rules, so that companies like ours can stay in the business and properly manage CCDD.

Sincerely,



Michael Stanczak
Vice President
North Region – Materials Midwest

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