

March 9, 2012

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STATE OF ILLINOIS  
Pollution Control Board

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John Therriault  
Clerk's Office  
Illinois Pollution Control Board  
100 W. Randolph, Suite 11-500  
Chicago, IL 60601

Re: Proposed amendments to 35 Ill. Admin. Code 1100

*PC# 25*

Dear Mr. Therriault:

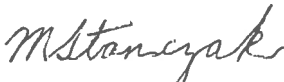
Previously I wrote a letter to the Pollution Control Board regarding Hanson Material Service's concerns with groundwater monitoring for Clean Construction and Demolition Debris (CCDD) operations. I commend you for your decision to eliminate this requirement from the developing rules.

However, I still have a few remaining concerns with the proposed CCDD rules, particularly with regards to the proposed Maximum Allowable Concentrations (MACs) for soil acceptance at CCDD sites. As it stands, these MACs will be very restrictive with regards to CCDD evaluation. According to metropolitan Chicago analytical data from CCDD projects that we have investigated since July 2010, excavated soils from this area of the State of Illinois tends to be pH neutral to slightly alkaline.

If the Board decides that MACs based on the extreme ranges of pH based soil clean up objectives should remain unaltered, I believe that a high percentage of the material from project sites our company evaluates will need to be turned away and consequently disposed of at sanitary landfills, unregulated fill sites, or out of State. In fact, it is still quite likely, despite the decision to abandon groundwater monitoring, that if nothing changes with the MAC standards Hanson Material Service will be forced to opt out of the CCDD and Uncontaminated Soil Fill operations business due to increased costs, liability, and a substantial decrease in business.

I would ask once again that you reconsider the necessity of such restrictive regulatory requirements for managing CCDD. As others have mentioned previously, the rules as they stand will most certainly have a negative impact on our State from an economic perspective, with a negligible positive effect on human health and the environment.

Sincerely,



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