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Fire Department & Prevention
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Senior Community Center
(708) 444-5150

www.tinleypark.org



March 2, 2012

Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, suite 11-500
Chicago, Illinois 60601
Attention: Clerk's Office

RECEIVED
CLERK'S OFFICE
MAR 14 2012
STATE OF ILLINOIS
Pollution Control Board

PCT# 21

RE: Clean Construction Demolition Debris Disposal Rules

(R12-9)

Dear Members of the Board:

The Village of Tinley Park is in full support of the primary intent of CCDD rules, which is to protect the State's groundwater. It is therefore understandable that reasonable and accurate methods for testing fill material are used to determine what is clean. Current rules require representative sampling, professional certification and industry standard investigative measures to make this determination. Each year, Tinley Park budgets approximately \$30,000 extra for the CCDD testing and certification related to spoil generated by excavations required primarily for the maintenance of underground utilities and related infrastructure. Other capital improvements projects will drive this number higher depending on the scope of the project (reconstruction of streets, parking lots, etc.).

The difficulty for Tinley Park and other communities is the use of a photoionization detector (PID) at the CCDD fill site to make the final determination of clean fill. The PID can determine the presence of petroleum products; however, false positive readings occur in up to 10 percent of the readings (based on our experience and feedback received from several other communities). This requires the load to be returned to the municipality and/or disposed of in a landfill. The cost for additional hauling and disposing of these rejected loads can be up to 10 times the cost of disposal in the CCDD fill site. Applying this cost to 10 percent of the average annual volume of clean fill produces a cost escalation of approximately \$6,000, which is a 20% increase.

Again, Tinley Park recognizes the need for monitoring and testing fill material and is willing to incur the reasonable costs for these requirements; however, the additional cost brought about by unreliable testing equipment / methods is not reasonable. I ask that the responsibility that is currently placed upon licensed professionals to certify compliance with applicable standards be allowed to govern the process.

Respectfully submitted,

Edward J. Zabrocki, Mayor

Village of Tinley Park