



April 18, 2012

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

Re: Case # R21012-009
Proposed Amendments to Clean Construction or Demolition Debris (CCDD) Rules

Dear Mr. Therriault:

These comments are being submitted by Vulcan Materials Company regarding the first notice of the proposed amendments for Clean Construction or Demolition Debris (CCDD) Fill Operations. Vulcan is the nation's largest producer of construction aggregates and is a major producer of other construction materials including asphalt, ready-mixed concrete, and cement. Vulcan operates two permitted CCDD fill operations and has three registered uncontaminated soil fill operations. Vulcan appreciates the Board's willingness to consider comments on the proposed amendments.

Vulcan applauds and supports the Board's decision to remove Subpart G: Groundwater Monitoring from the proposed amendments to the rule. The rules govern the receipt of uncontaminated materials that pose minimal risk of groundwater contamination. In addition, the various controls used by the industry and formalized through the rulemaking including source evaluations, analytical testing, certification and screening procedures reduce the risk of a CCDD fill operation receiving contaminated material. Therefore, the requirement for CCDD fill operations to conduct groundwater monitoring is unnecessary and also would be excessively burdensome to the industry.

Vulcan supports IEPA re-evaluating the use of the lowest pH-dependent value when determining the Maximum Allowable Concentration (MAC) for pH dependent chemical constituents. Based on the testimony provided and data presented, establishing MAC criteria on the lowest pH specific soil remediation objectives from pH 6.25 and above is preferred as the proposed approach would result in overly conservative and restrictive concentration values.

Again, Vulcan appreciates this opportunity to provide comments on this rulemaking and welcomes any questions the Board may have concerning our comments.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "David Clement", written over a horizontal line.

David Clement
Vice President and General Manager – Midwest Area, Central Region
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