



# Forest Preserve District OF WILL COUNTY

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*ReconnectWithNature.org*

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*Bringing People and Nature Together*

VIA FACSIMILE

November 30, 2012

Mr. Thomas Holbrook  
Chairman, Pollution Control Board  
James R. Thompson Center  
100 West Randolph  
Suite 11-500  
Chicago, Illinois 60601

*PC# 51*

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CLERK'S OFFICE

NOV 30 2012

STATE OF ILLINOIS  
Pollution Control Board

RE: Illinois Pollution Control Board (IPCB) Rulemaking Case R12-9 (Land) for Clean Construction Debris (CCDD) and Uncontaminated Soil Fill Operations

Dear Chairman Holbrook:

I am writing in response to the IPCB's comment period for Rulemaking Case R12-9. The Forest Preserve Board of Commissioners (Board) previously adopted a resolution in April 2010, which you should have on file, outlining the basis for continuing to comment on the CCDD rule making process.

The Board believes that sufficient safeguards are needed to protect ground water resources. The lack of a groundwater monitoring requirement in the rulemaking for CCDD and Uncontaminated Soil Fill Operations is of great concern; most Will County communities rely on groundwater as a potable water source and many abandoned quarries or other potentially suitable fill sites are near forest preserves that protect environmentally sensitive wildlife and habitats. Without adequate testing requirements in place, there is no way to insure facility operators are following the new regulations in accepting suitable materials for disposal at CCDD and Uncontaminated Soil Fill sites. This creates a serious risk for groundwater contamination, a health risk to Will County residents, and potential risks for protected ecologically sensitive areas near CCDD and Uncontaminated Soil Fill sites.

The Forest Preserve District has worked closely in coordinating reviews on this issue with the County of Will -Waste Services Division. On November 27, 2012, Will County provided you with comments regarding the estimated cost to implement a groundwater

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monitoring program. Their analysis shows how feasible and reasonable the costs would be to implement the ground water monitoring program - in the range of .06 to .16 cents per cubic yard that can be recovered by facility operators. In cost-benefit terms, this is a small cost relative to the public benefit of insuring a clean and safe drinking water supply for Will County residents.

The Forest Preserve District urges the IPCB members to seriously consider the information provided by Will County and agree to add a groundwater monitoring requirement at CCDD and Uncontaminated Soil Operations.

Thank you for considering the District's concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Marcella M. DeMauro". The signature is fluid and cursive, with the first name being the most prominent.

Marcella M. DeMauro  
Executive Director  
Forest Preserve District of Will County

cc: Forest Preserve Board of Commissioners  
Mr. Brent Hassert