

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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APR 17 2006

IN THE MATTER OF:)
)
PROPOSED AMENDMENTS TO)
TIERED APPROACH TO CORRECTIVE)
ACTION OBJECTIVES)
(35 Ill. Adm. Code 742))
)

R06-10
(Rulemaking-Land)

STATE OF ILLINOIS
Pollution Control Board

PC#3

NOTICE

Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph, Suite 11-500
Chicago, Illinois 60601
(Via First Class Mail)

Bill Richardson, General Counsel
Illinois Dept. of Natural Resources
One Natural Resources Way
Springfield, Illinois 62702-1271
(Via First Class Mail)

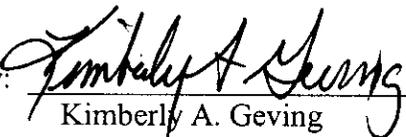
Matt Dunn
Environmental Bureau Chief
Office of the Attorney General
James R. Thompson Center
100 W. Randolph, 12th Floor
Chicago, Illinois 60601
(Via First Class Mail)

Richard R. McGill, Jr.
Ill. Pollution Control Board
James R. Thompson Center
100 W. Randolph, Suite 11-500
Chicago, Illinois 60601
(Via First Class Mail)

(Service List-Via First Class Mail)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board the Illinois Environmental Protection Agency's **FINAL COMMENTS**, a copy of each of which is herewith served upon you.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: 
Kimberly A. Geving
Assistant Counsel
Division of Legal Counsel

DATE: April 13, 2006

1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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)	

STATE OF ILLINOIS
Pollution Control Board

FINAL COMMENTS

NOW COMES the Illinois Environmental Protection Agency (“Illinois EPA” or “Agency”), by one of its attorneys, Kimberly A. Geving, and pursuant to 35 Ill. Adm. Code 102.108, respectfully submits these FINAL COMMENTS in the above-captioned matter to the Illinois Pollution Control Board (“Board”).

It is the Agency’s contention that the proposed amendments filed in this matter with the Board on September 29, 2005, and the corresponding Errata Sheets 1 through 3 filed subsequent to the initial proposal, constitute technically feasible, economically reasonable, and well-supported amendments to Part 742. The Agency believes that the Board should adopt the proposed amendments in their entirety as submitted by the Agency, including changes proposed in Errata Sheets 1 through 3.

A. Background

On September 29, 2005, the Agency filed its proposed amendments in the above-captioned matter to incorporate changes to the rules that are designed to improve or clarify particular aspects of the Tiered Approach to Corrective Action Objectives (“TACO”) methodology. Since the last amendments in 2000, further experience with using TACO in the Agency’s remediation programs and changes in scientific information on the national level have made it necessary to update various provisions of Part 742.

Over the last 5 years, the Agency compiled a list of revisions that evolved into the proposed amendments. As was the case in the last amendatory rulemaking to this Part, many of the changes arose from discussions between the Agency and members of the regulated community. Others, such as updates to many of the ASTM methods and adding background values for PNAs, stemmed from new scientific documentation or studies that were published.

As always, the Agency had several meetings with the regulated community during the development of the proposed amendments. With the exception of some issues raised at hearing concerning acceptable detection limits (“ADLs”), which were not even part of the Agency’s proposal in this matter, we believe that the regulated community’s comments and concerns were incorporated into the draft the Board received last September and were further refined through the three Errata Sheets filed with the Board.

B. Adoption of the Illinois EPA’s Proposal

The Agency believes that it has produced viable amendments that are well supported by the testimony given by the Agency witnesses. Additionally, Mr. Martin’s testimony also offers support for the Agency’s proposal.

The Agency would also like to comment that it supports the proposed amendments offered by Mr. Gobelman on behalf of the Illinois Department of Transportation (“IDOT”) and has no objection to the Board adopting the exact language proposed by IDOT.

C. Issues of Concern at Hearing

The Agency believes that there were really two main items that were unresolved at the hearings. The first item arose with a line of questions from Anand Rao to Tom

Hornshaw concerning polycyclic aromatic hydrocarbons (“PAHs”). The second item was how to address the ADL issue raised by Mr. Thomas.

1. Cancer Risks for Urban Background Levels of PAHs

At the March 1, 2006 hearing, Mr. Rao asked Dr. Hornshaw a line of questions regarding the new background values for PAHs and whether there is any concern about the cumulative effect of similar acting chemicals since some of the PAHs are listed as similar acting substances (see transcript at pp. 13-14). Dr. Hornshaw replied that the background levels are probably less conservative than the risk based values; however, he stated that the sum of the risks still fall within the acceptable range of 10^{-4} to 10^{-6} .

Mr. Rao then asked if he could look into the issue of whether we should require an evaluation in Tier 1 if multiple chemicals show up at a particular site. Dr. Hornshaw committed to analyzing the data, and his analysis has been compiled into a table that is attached to these Final Comments as Attachment 1. The Agency’s conclusion remains unchanged. Even though the total risk for carcinogenic PAHs in the Chicago and EPRI studies are greater than the Tier 1 risk levels, they still fall within the acceptable range of 10^{-4} to 10^{-6} . Therefore, the Agency believes that no changes are necessary to its proposal in this regard.

2. Acceptable Detection Limits

As the Board is fully aware, the Agency did not have any proposed amendments to the ADLs in its proposal. However, extensive testimony was provided on this and related topics at both hearings due to the fact that Mr. Thomas raised the issue at the first hearing. Additionally, members of the laboratory community (Mr. Thomas, Mr. Halm, Mr. Truesdale, and Mr. Pronger) provided lengthy testimony at the second

hearing. As a result, the Hearing Officer asked the participants to specifically address how we think those issues should be addressed—whether in another hearing before first notice, not in this docket at all, or in a sub-docket. The Agency will provide its preference later in these Final Comments. However, we would first like to comment on some of the issues raised by Mr. Thomas.

a. Analytical Limitations Associated with ADLs, MDLs, and PQLs

Mr. Thomas raised issues that centered on the ability of laboratories to meet the ADLs that have been required for the last nine years in the TACO rules. He claimed that routinely used methods cannot meet remediation objectives (or ADLs), or that some ADLs are not achievable. As shown in Attachment 2 to these Final Comments, there are labs in Illinois and other states that are certified for most parameters. For the few parameters where there are no labs certified for Method 8061A and Method 8131 there are other methods available. However, the Agency has not encountered these compounds as constituents of concern.

The goal of the Illinois Environmental Protection Act (“Act”) (415 ILCS 5/1 et seq.) is to ensure that remediation objectives are protective of human health and the environment. If ADLs are set too high, then the remediation objectives are not protective and can become meaningless. For example, the remediation objective for pentachlorophenol (which was discussed in this proceeding) is 1 ppb for groundwater and 30 ppb for the migration to groundwater pathway; however, the ADL for one method (8270) is 3,300 ppb. The PQL for Method 8270 is even greater than the remediation objective for the residential soil ingestion exposure route of 3,000 ppb. The 1 in 1,000,000 cancer risk concentration (from Appendix A. Table H) for groundwater

ingestion is 0.71 ppb versus a 50 ppb PQL using Method 8270. Both the soil and groundwater PQLs using Method 8270 are two orders of magnitude greater than the corresponding risk-based values for pentachlorophenol. Unfortunately, the PQL obtained by the use of Method 8270 would technically not even achieve a risk level in the 10^{-4} to 10^{-6} range. On the other hand, Method 8151A GC/ECD can achieve a soil ADL of 0.16 ppb and a groundwater ADL of 0.076 ppb, and Suburban and 35 other labs are certified for that method. Therefore, the Agency believes there are a sufficient number of methods available to address the remediation objectives. Some labs certified for the appropriate methods may not be located in Illinois, but consultants still use them for Illinois remediation sites on a regular basis. Thus, the Agency feels no need to change the ADLs.

Another issue raised by Mr. Thomas in written testimony and at hearing was the applicability of ADLs to the Class I groundwater remediation objectives. In his pre-filed testimony, Mr. Thomas stated that the ADLs were difficult to achieve. During hearing there was testimony that such stringent ADLs were not needed since no one drinks the groundwater near remediation sites. Nothing could be further from the truth. The Agency has encountered thousands of private wells in the vicinity of remediation sites. Examples include Lisle, Downers Grove, Beardstown, Carol Stream, and Naperville. To establish ADLs that don't account for a determination of compliance with groundwater or drinking water objectives would be a grave disservice to the citizens of Illinois and arguably would not be protective of human health.

To the best of our knowledge, there are numerous certified laboratories that are achieving the ADLs without issue. There are over 300 Site Remediation Program ("SRP") projects and over 1,000 Leaking Underground Storage Tank ("LUST") sites

processed yearly. While there may be occasional site-specific complexities, those sites have not raised any over-arching issues such as those implied in these proceedings.

b. Filtered Water Samples

Mr. Thomas also said that he did not remember any time when he has received a filtered water sample for organic analysis (see transcript at pp.42-43). While most samples are not filtered, there are situations, such as those discussed at hearing, where samples should be, and are, filtered (e.g., risk assessments). Many samples do not need to be filtered; however, the Agency believes it has the discretion to allow filtered samples depending on site-specific conditions.

c. Reporting of Soil Samples on a Dry Weight Basis

Mr. Thomas commented that converting a sample result to a dry weight basis can raise its reporting limit (ADL). Section 742.225(f) requires samples to be *reported* on a dry weight basis. It does not mention any particular lab method. Compliance with the ADL requirement is met if the lab uses the proper lab procedure to meet the ADL in question. Compliance with the remediation objective is met when the dry weight meets the objective. The Agency does not believe that converting a sample result (by using a multiplier based on relative moisture content) obtained on a wet sample to a dry weight basis has any impact on the reporting limit.

d. F_{oc} Correction Factor

Mr. Thomas commented at hearing that consultants wanted his lab to provide a correction factor for converting total organic matter to total organic carbon (F_{oc}) and that this was not something the lab could provide because they didn't have necessary field data, etc. While the Agency feels that this is an issue to be resolved between the lab and

their clients, it has no objection to providing a factor of 0.58 in the rules. Section 742.215(a)(1)(B) could be modified by deleting the proposed words “appropriately adjusted” and replacing them with “multiplied by 0.58.” If someone wished to develop an alternative correction factor, they could use paragraph (b)(3), which allows for approval of other methods.

**e. Allowing Hundreds of Sites to be Closed on Theoretical Data
In Lieu of Analytical Testing to Verify a Site Is Clean**

The Agency does not understand this comment. Since the effective date of TACO, over 1,500 SRP sites and 7,400 LUST sites have been closed in accordance with TACO. The level of contamination at these sites has been determined to be protective of human health and the environment.

f. Performance Based Measurement System

Mr. Thomas stated in his pre-filed testimony that the Agency should be taking a Performance Based Measurement System (“PBMS”) approach to analytical requirements in TACO. This comment apparently refers to a very procedurally rich RCRA program under USEPA. However, the Agency is unclear as to what specifically is being requested of us. On page 6 of his pre-filed testimony, Mr. Thomas identified certain elements (questions that need to be answered, decisions that must be supported by the data, what level of uncertainty is acceptable, and documentation that must be generated) as part of the problem. The Agency feels that all of these elements are fundamental to its remediation programs and are already addressed by TACO and program procedural rules. For example, the first element, “questions to be answered by monitoring,” is a very basic and integral part of the SRP, RCRA, and LUST. Monitoring in those programs is not

only geared toward determining the nature and extent of contamination, but provides an estimation of how far contaminants will travel in the future. TACO can also answer questions about existing risk. The “decisions to be supported by the data” are the determination of remediation objectives and development of remedial action plans. TACO has attempted to minimize the “level of uncertainty” by providing ADLs. The “documentation to be generated to support this approach,” at least with respect to monitoring, is part of and inherent to the Agency’s laboratory certification program. Any additional effort would be redundant.

The testimony and comments offered during hearing indicate the reason for the PBMS would be to allow remediation objectives to be based on what is analytically achievable as opposed to being risk based. In some cases, this occurs when the lowest ADL available is still greater than the risk based objective. As the Agency witnesses testified, there are limited situations when this occurs. To change the structure of TACO for convenience or for economic reasons would not be consistent with the Act. And as Mr. Turpin stated at hearing, “...it was never the intention that the program be able to be operated only using what some laboratories call routine or common methods. It’s understood that there are times in order to be protective of health and the environment that more specialized methods would be needed.” (see page 73 of the transcript) And as shown in Attachment 2, there are labs certified to perform nearly every method; sometimes they are located in another state.

D. Conclusion

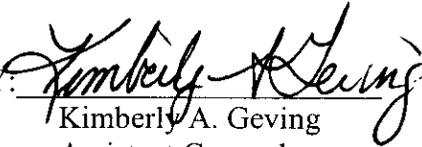
In conclusion, the Agency believes that its position on matters raised in this proceeding is well established by the testimony of its witnesses. Additionally, the

Agency has attempted in these Final Comments to further clarify and support its position on those issues that were raised by Mr. Thomas at hearing, even though most of his testimony addressed issues that were not part of the Agency's original proposal.

It is the Agency's position that no further hearings should be scheduled in this docket to address those matters raised by Mr. Thomas, nor should a sub-docket be opened for that purpose. Instead, the Agency believes that the laboratories should work together as collective unit to reach a consensus on what they, as a whole, believe should be changed. If and when the laboratories can agree on a concrete approach that is technically justified, we would invite them to come to the Agency with that unified approach, and we would be amenable to giving them our input at that time. However, at this time, we do not believe that their testimony supports further changes to the rules.

WHEREFORE, the Agency submits its Final Comments, including the Attachments, for the Board's consideration and respectfully requests that the Board adopt the Agency's proposal in its entirety, including all three Errata Sheets.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

BY: 
Kimberly A. Geving
Assistant Counsel
Division of Legal Counsel

Dated: April 13, 2006

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P.O. Box 19276
Springfield, Illinois 62794-9276
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THIS FILING IS SUBMITTED ON RECYCLED PAPER

CANCER RISKS FOR URBAN BACKGROUND LEVELS OF POLYCYCLIC AROMATIC HYDROCARBONS (PAHs)

PAH ⁽¹⁾	Chicago Background Level ⁽²⁾ (mg/kg)	Chicago Background Risk	EPRI-Metro Background Level ⁽³⁾ (mg/kg)	EPRI/Metro Background Risk	EPRI/Non-Metro Background Level ⁽⁴⁾ (mg/kg)	EPRI/Non-Metro Background Risk
BaA	1.1	1.2E-06	1.8	2.0E-06	0.72	8.0E-07
BbF	1.5	1.7E-06	2.1	2.3E-06	0.70	7.8E-07
BkF	0.99	1.1E-07	1.7	1.9E-07	0.63	7.0E-08
BaP	1.3	1.4E-05	2.1	2.3E-05	0.98	1.1E-05
CHR	1.2	1.0E-08	2.7	3.0E-08	1.1	1.0E-08
DahA	0.20	2.2E-06	0.42	4.7E-06	0.15	1.7E-06
IP	0.86	9.6E-07	1.6	1.8E-06	0.51	5.7E-07
Total Risk		2.1E-05		3.4E-05		1.5E-05

NOTE: Total risk for carcinogenic PAHs at TACO Appendix B, Tables 1 and 2 Remediation Objectives is 7.0E-06; Total risks for Chicago, EPRI/Metro, and EPRI/Non-Metro levels are 3.0, 4.9, and 2.1 times greater, respectively, than TACO Tier 1 Risk.

- (1) BaA= Benzo(a) Anthracene; BbF=Benzo(b) Fluoranthene; BkF=Benzo(k) Fluoranthene; BaP=Benzo(a) Pyrene; CHR=Chrysene; DahA=Dibenzo(a,h,) Anthracene; IP=Indeno(1,2,3-c,d)Pyrene
- (2) Background concentration proposed for sites within Chicago city limits.
- (3) Background concentration proposed for sites within metropolitan statistical areas other than Chicago.
- (4) Background concentration proposed for sites outside of metropolitan statistical areas.

TACO APPENDIX B

Attachment 2

3/16/2006

Laboratories Accredited For 8021B

Page 1 of 2

LABORATORY NAME	METHNAME	CITY	STATE
Accutest Laboratories of New England	8021B	Marlborough	MA
Accutest Laboratories of New Jersey	8021B	Dayton	NJ
Columbia Analytical Services	8021B	Rochester	NY
e-Lab Analytical, Inc. - TX Division	8021B	Houston	TX
Environmental Monitoring and Technologies, Inc.	8021B	Morton Grove	IL
Environmental Science Corp.	8021B	Mt. Juliet	TN
Environmental Testing & Consulting, Inc	8021B	Memphis	TN
Environmetrics	8021B	St. Louis	MO
Gulf Coast Analytical Laboratories, Inc.	8021B	Baton Rouge	LA
Kemron Environmental Services	8021B	Marietta	OH
Lancaster Laboratories, Inc.	8021B	Lancaster	PA
Marathon Petroleum Company LLC Environmental Laboratories	8021B	Catlettsburg	KY
Pace Analytical Services - IN	8021B	Indianapolis	IN
PACE Analytical Services - KS	8021B	Lenexa	KS
Pace Analytical Services - MN	8021B	Minneapolis	MN
PACE Analytical Services, Inc. (Industrial Dr.)	8021B	Green Bay	WI
PDC Laboratories, Inc.	8021B	Peoria	IL
SGS Environmental Services Inc.	8021B	Anchorage	AK
Southern Petroleum Laboratory Inc. MI	8021B	Traverse City	MI
Southern Petroleum Laboratory, Inc - TX	8021B	Houston	TX
STL Buffalo	8021B	Amherst	NY
STL Chicago	8021B	University Park	IL
STL Denver	8021B	Arvada	CO

LABORATORY NAME	METH NAME	CITY	STATE
STL North Canton	8021B	North Canton	OH
STL Pensacola	8021B	Pensacola	FL
STL Savannah	8021B	Savannah	GA
STL St. Louis	8021B	Earth City	MO
TestAmerica Analytical Testing Corp. - IA	8021B	Cedar Falls	IA
TestAmerica Analytical Testing Corp. - IL	8021B	Buffalo Grove	IL
TestAmerica Analytical Testing Corp. - TN	8021B	Nashville	TN
TestAmerica Analytical Testing Corp. - WI	8021B	Watertown	WI
TMI Analytical Services, LLC	8021B	Springfield	IL
TriMatrix Laboratories, Inc.	8021B	Grand Rapids	MI
US Biosystems, Inc.	8021B	Boca Raton	FL
USFilter Enviroscan Services	8021B	Rothschild	WI

LABORATORY NAME	METHNAME	CITY	STATE
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8061A

LABORATORY NAME	METHNAME	CITY	STATE
STL Denver	8070A	Arvada	CO

LABORATORY NAME	METHNAME	CITY	STATE
Accutest Laboratories of New England	8081A	Marlborough	MA
Accutest Laboratories of New Jersey	8081A	Dayton	NJ
ARDL, Inc.	8081A	Mt. Vernon	IL
Clayton Group Services, Inc.	8081A	Novi	MI
Columbia Analytical Services	8081A	Rochester	NY
CompuChem a division of Liberty Analytical Corp.	8081A	Cary	NC
CT Laboratories	8081A	Baraboo	WI
e-Lab Analytical, Inc. - MI Division	8081A	Holland	MI
e-Lab Analytical, Inc. - TX Division	8081A	Houston	TX
Empirical Laboratories, LLC	8081A	Nashville	TN
Environmental Monitoring and Technologies, Inc.	8081A	Morton Grove	IL
Environmental Science Corp.	8081A	Mt. Juliet	TN
Environmental Testing & Consulting, Inc.	8081A	Memphis	TN
Fibertec, Incorporated	8081A	Holt	MI
First Environmental Laboratories, Inc.	8081A	Naperville	IL
General Engineering Laboratories, LLC	8081A	Charleston	SC
Grace Analytical Lab, Inc.	8081A	Berkeley	IL
Gulf Coast Analytical Laboratories, Inc.	8081A	Baton Rouge	LA
Heritage Environmental Services, LLC	8081A	Indianapolis	IN
Kemron Environmental Services	8081A	Marietta	OH
Lancaster Laboratories, Inc.	8081A	Lancaster	PA
McCoy & McCoy Laboratories, Inc.	8081A	Madisonville	KY
Metropolitan Water Reclamation District-Greater Chicago Organics	8081A	Schaumburg	IL

LABORATORY NAME	METH NAME	CITY	STATE
Microbac Laboratories Inc.	8081A	Merrillville	IN
Pace Analytical Services - IN	8081A	Indianapolis	IN
PACE Analytical Services - KS	8081A	Lenexa	KS
Pace Analytical Services - MN	8081A	Minneapolis	MN
PACE Analytical Services - WI	8081A	Kimberly	WI
PDC Laboratories, Inc.	8081A	Peoria	IL
Prairie Analytical Systems, Incorporated	8081A	Springfield	IL
RTI Laboratories, Inc.	8081A	Livonia	MI
SGS Environmental Services Inc.	8081A	Anchorage	AK
Southern Petroleum Laboratory, Inc - TX	8081A	Houston	TX
STAT Analysis Corporation	8081A	Chicago	IL
STL Buffalo	8081A	Amherst	NY
STL Chicago	8081A	University Park	IL
STL Denver	8081A	Arvada	CO
STL North Canton	8081A	North Canton	OH
STL Pensacola	8081A	Pensacola	FL
STL Pittsburgh	8081A	Pittsburgh	PA
STL Savannah	8081A	Savannah	GA
STL St. Louis	8081A	Earth City	MO
Suburban Laboratories, Inc.	8081A	Hillside	IL
Teklab, Incorporated	8081A	Collinsville	IL
TestAmerica Analytical Testing Corp. - IL	8081A	Buffalo Grove	IL
TestAmerica Analytical Testing Corp. - OH	8081A	Dayton	OH

LABORATORY NAME	METHNAME	CITY	STATE
TestAmerica Analytical Testing Corp. - TN	8081A	Nashville	TN
TMI Analytical Services, LLC	8081A	Springfield	IL
Trace Analytical Laboratories, Inc.	8081A	Muskegon	MI
TriMatrix Laboratories, Inc.	8081A	Grand Rapids	MI
US Biosystems, Inc.	8081A	Boca Raton	FL
XENCO Laboratories, Houston TX	8081A	Houston	TX

LABORATORY NAME	METHNAME	CITY	STATE
Environment al Testing & Consulting, Inc	8121	Memphis	TN
Gulf Coast Analytical Laboratories, Inc.	8121	Baton Rouge	LA
TestAmerica Analytical Testing Corp. - OH	8121	Dayton	OH

LABORATORY NAME	METHNAME	CITY	STATE
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8131

LABORATORY NAME	METHNAME	CITY	STATE
Accutest Laboratories of New England	8151A	Marlborough	MA
Accutest Laboratories of New Jersey	8151A	Dayton	NJ
Columbia Analytical Services	8151A	Rochester	NY
CompuChem a division of Liberty Analytical Corp.	8151A	Cary	NC
e-Lab Analytical, Inc. - TX Division	8151A	Houston	TX
Empirical Laboratories, LLC	8151A	Nashville	TN
Environmental Science Corp.	8151A	Mt. Juliet	TN
Environmental Testing & Consulting, Inc	8151A	Memphis	TN
Fibertec, Incorporated	8151A	Holt	MI
General Engineering Laboratories, LLC	8151A	Charleston	SC
Gulf Coast Analytical Laboratories, Inc.	8151A	Baton Rouge	LA
Heritage Environmental Services, LLC	8151A	Indianapolis	IN
Kemron Environmental Services	8151A	Marietta	OH
Lancaster Laboratories, Inc.	8151A	Lancaster	PA
McCoy & McCoy Laboratories, Inc.	8151A	Madisonville	KY
Microbac Laboratories Inc.	8151A	Memilville	IN
Pace Analytical Services - IN	8151A	Indianapolis	IN
PDC Laboratories, Inc.	8151A	Peoria	IL
RTI Laboratories, Inc.	8151A	Livonia	MI
Southern Petroleum Laboratory, Inc - TX	8151A	Houston	TX
STL Buffalo	8151A	Amherst	NY
STL Chicago	8151A	University Park	IL
STL Denver	8151A	Arvada	CO

LABORATORY NAME	METHNAME	CITY	STATE
STL North Canton	8151A	North Canton	OH
STL Pensacola	8151A	Pensacola	FL
STL Pittsburgh	8151A	Pittsburgh	PA
STL Savannah	8151A	Savannah	GA
STL St. Louis	8151A	Earth City	MO
Suburban Laboratories, Inc.	8151A	Hillside	IL
Teklab, Incorporated	8151A	Collinsville	IL
TestAmerica Analytical Testing Corp. - OH	8151A	Dayton	OH
TestAmerica Analytical Testing Corp. - TN	8151A	Nashville	TN
Trace Analytical Laboratories, Inc.	8151A	Muskegon	MI
TriMatrix Laboratories, Inc.	8151A	Grand Rapids	MI
US Biosystems, Inc.	8151A	Boca Raton	FL
XENCO Laboratories, Houston TX	8151A	Houston	TX

LABORATORY NAME	METH NAME	CITY	STATE
Abbott Global Environmental, Health and Safety Laboratories	8260 B	North Chicago	IL
Accutest Laboratories of New England	8260B	Marlborough	MA
Accutest Laboratories of New Jersey	8260B	Dayton	NJ
American Bottoms Regional Wastewater Treatment Facility	8260B	Sauget	IL
ARDL, Inc.	8260B	Mt. Vernon	IL
Clayton Group Services, Inc.	8260B	Novi	MI
Columbia Analytical Services	8260B	Rochester	NY
CompuChem a division of Liberty Analytical Corp.	8260B	Cary	NC
CT Laboratories	8260 B	Baraboo	WI
e-Lab Analytical, Inc. - MI Division	8260B	Holland	MI
e-Lab Analytical, Inc. - TX Division	8260B	Houston	TX
Empirical Laboratories, LLC	8260B	Nashville	TN
Environmental Monitoring and Technologies, Inc.	8260B	Morton Grove	IL
Environmental Science Corp.	8260B	Mt. Juliet	TN
Environmental Testing & Consulting, Inc	8260B	Memphis	TN
Environmetrics	8260B	St. Louis	MO
Fibertec, Incorporated	8260 B	Holt	MI
First Environmental Laboratories, Inc.	8260B	Naperville	IL
Gabriel Laboratories, Ltd.	8260B	Chicago	IL
General Engineering Laboratories, LLC	8260B	Charleston	SC
Grace Analytical Lab, Inc.	8260B	Berkeley	IL
Gulf Coast Analytical Laboratories, Inc.	8260B	Baton Rouge	LA
Heritage Environmental Services, LLC	8260B	Indianapolis	IN

LABORATORY NAME	METHNAME	CITY	STATE
Kemron Environmental Services	8260B	Marietta	OH
Lancaster Laboratories, Inc.	8260B	Lancaster	PA
Marathon Petroleum Company LLC Environmental Laboratories	8260B	Catlettsburg	KY
McCoy & McCoy Laboratories, Inc.	8260B	Madisonville	KY
Microbac Laboratories Inc.	8260B	Memilville	IN
New Age / Landmark Inc. #1	8260B	Benton Harbor	MI
Pace Analytical Services - IN	8260B	Indianapolis	IN
PACE Analytical Services - KS	8260B	Lenexa	KS
Pace Analytical Services - MN	8260B	Minneapolis	MN
PACE Analytical Services, Inc. (Industrial Dr.)	8260B	Green Bay	WI
PDC Laboratories, Inc.	8260B	Peoria	IL
Prairie Analytical Systems, Incorporated	8260 B	Springfield	IL
RTI Laboratories, Inc.	8260B	Livonia	MI
SGS Environmental Services Inc.	8260B	Anchorage	AK
Southern Petroleum Laboratory Inc. MI	8260B	Traverse City	MI
Southern Petroleum Laboratory, Inc - TX	8260B	Houston	TX
STAT Analysis Corporation	8260B	Chicago	IL
STL Buffalo	8260B	Amherst	NY
STL Chicago	8260B	University Park	IL
STL Denver	8260B	Arvada	CO
STL North Canton	8260B	North Canton	OH
STL Pensacola	8260B	Pensacola	FL
STL Pittsburgh	8260B	Pittsburgh	PA

LABORATORY NAME	METH NAME	CITY	STATE
STL Savannah	8260B	Savannah	GA
STL St. Louis	8260B	Earth City	MO
STL Valparaiso	8260B	Valparaiso	IN
Suburban Laboratories, Inc.	8260B	Hixside	IL
Teklab, Incorporated	8260 B	Collinsville	IL
TestAmerica Analytical Testing Corp. - IA	8260B	Cedar Falls	IA
TestAmerica Analytical Testing Corp. - IL	8260B	Buffalo Grove	IL
TestAmerica Analytical Testing Corp. - OH	8260B	Dayton	OH
TestAmerica Analytical Testing Corp. - TN	8260B	Nashville	TN
TestAmerica Analytical Testing Corp. - WI	8260B	Watertown	WI
TMI Analytical Services, LLC	8260B	Springfield	IL
Trace Analytical Laboratories, Inc.	8260B	Muskegon	MI
TriMatrix Laboratories, Inc.	8260B	Grand Rapids	MI
US Biosystems, Inc.	8260B	Boca Raton	FL
USFilter Enviroscan Services	8260B	Rothschild	WI
White Water Associates, Inc.	8260B	Amasa	MI
XENCO Laboratories, Houston TX	8260B	Houston	TX

LABORATORY NAME	METHNAME	CITY	STATE
Accutest Laboratories of New England	8270C	Marlborough	MA
Accutest Laboratories of New Jersey	8270C	Dayton	NJ
American Bottoms Regional Wastewater Treatment Facility	8270C	Sauget	IL
ARDL, Inc.	8270C	Mt. Vernon	IL
Clayton Group Services, Inc.	8270C	Novi	MI
Columbia Analytical Services	8270C	Rochester	NY
CompuChem a division of Liberty Analytical Corp.	8270C	Cary	NC
CT Laboratories	8270 C	Baraboo	WI
e-Lab Analytical, Inc. - MI Division	8270C	Holland	MI
e-Lab Analytical, Inc. - TX Division	8270C	Houston	TX
Empirical Laboratories, LLC	8270C	Nashville	TN
Environmental Monitoring and Technologies, Inc.	8270C	Morton Grove	IL
Environmental Science Corp.	8270C	Mt. Juliet	TN
Environmental Testing & Consulting, Inc	8270C	Memphis	TN
Environmetrics	8270C	St. Louis	MO
Fibertec, Incorporated	8270 C	Holt	MI
First Environmental Laboratories, Inc.	8270C	Naperville	IL
Gabriel Laboratories, Ltd.	8270C	Chicago	IL
General Engineering Laboratories, LLC	8270C	Charleston	SC
Grace Analytical Lab, Inc.	8270C	Berkeley	IL
Gulf Coast Analytical Laboratories, Inc.	8270C	Baton Rouge	LA
Heritage Environmental Services, LLC	8270C	Indianapolis	IN
Kamron Environmental Services	8270C	Marietta	OH

LABORATORY NAME	METH NAME	CITY	STATE
Lancaster Laboratories, Inc.	8270C	Lancaster	PA
Marathon Petroleum Company LLC Environmental Laboratories	8270C	Castlettsburg	KY
McCoy & McCoy Laboratories, Inc.	8270C	Madisonville	KY
Microbac Laboratories Inc.	8270C	Merrillville	IN
Pace Analytical Services - IN	8270C	Indianapolis	IN
PACE Analytical Services - KS	8270C	Lenexa	KS
Pace Analytical Services - MN	8270C	Minneapolis	MN
PACE Analytical Services - WI	8270C	Kimberly	WI
Pace Analytical Services, Inc. (Belleuve St.)	8270C	Green Bay	WI
PDC Laboratories, Inc.	8270C	Peoria	IL
Prairie Analytical Systems, Incorporated	8270 C	Springfield	IL
RTI Laboratories, Inc.	8270C	Livonia	MI
SGS Environmental Services Inc.	8270C	Anchorage	AK
Southern Petroleum Laboratory Inc. MI	8270C	Traverse City	MI
Southern Petroleum Laboratory, Inc - TX	8270C	Houston	TX
STAT Analysis Corporation	8270C	Chicago	IL
STL Buffalo	8270C	Amherst	NY
STL Chicago	8270C	University Park	IL
STL Denver	8270C	Arvada	CO
STL North Canton	8270C	North Canton	OH
STL Pensacola	8270C	Pensacola	FL
STL Pittsburgh	8270C	Pittsburgh	PA
STL Savannah	8270C	Savannah	GA

LABORATORY NAME	METHNAME	CITY	STATE
STL St. Louis	8270C	Earth City	MO
STL Valparaiso	8270C	Valparaiso	IN
Suburban Laboratories, Inc.	8270C	Hillside	IL
Teklab, Incorporated	8270 C	Collinsville	IL
TestAmerica Analytical Testing Corp. - IA	8270C	Cedar Falls	IA
TestAmerica Analytical Testing Corp. - IL	8270C	Buffalo Grove	IL
TestAmerica Analytical Testing Corp. - OH	8270C	Dayton	OH
TestAmerica Analytical Testing Corp. - TN	8270C	Nashville	TN
TMI Analytical Services, LLC	8270C	Springfield	IL
Trace Analytical Laboratories, Inc.	8270C	Muskegon	MI
TriMatrix Laboratories, Inc.	8270C	Grand Rapids	MI
US Biosystems, Inc.	8270C	Boca Raton	FL
USFilter Enviroscan Services	8270C	Rothschild	WI
XENCO Laboratories, Houston TX	8270C	Houston	TX

LABORATORY NAME	METHNAME	CITY	STATE
Accutest Laboratories of New England	8330	Marlborough	MA
ARDL, Inc.	8330	Mt. Vernon	IL
CompuChem a division of Liberty Analytical Corp.	8330	Cary	NC
CT Laboratories	8330	Baraboo	WI
e-Lab Analytical, Inc. - TX Division	8330	Houston	TX
Empirical Laboratories, LLC	8330	Nashville	TN
Environmental Monitoring and Technologies, Inc.	8330	Morton Grove	IL
Environmental Science Corp.	8330	Mt. Juliet	TN
Environmental Testing & Consulting, Inc	8330	Memphis	TN
General Engineering Laboratories, LLC	8330	Charleston	SC
Gulf Coast Analytical Laboratories, Inc.	8330	Baton Rouge	LA
Kemron Environmental Services	8330	Marietta	OH
Lancaster Laboratories, Inc.	8330	Lancaster	PA
PDC Laboratories, Inc.	8330	Peoria	IL
STL Chicago	8330	University Park	IL
STL Denver	8330	Arvada	CO
STL St. Louis	8330	Earth City	MO
TestAmerica Analytical Testing Corp. - TN	8330	Nashville	TN
TriMatrix Laboratories, Inc.	8330	Grand Rapids	MI

STATE OF ILLINOIS)
)
COUNTY OF SANGAMON)

PROOF OF SERVICE

I, the undersigned, on oath state that I have served the attached **FINAL COMMENTS** of the Illinois EPA upon the persons to whom they are directed, by placing a copy of each in an envelope addressed to:

Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph, Suite 11-500
Chicago, Illinois 60601

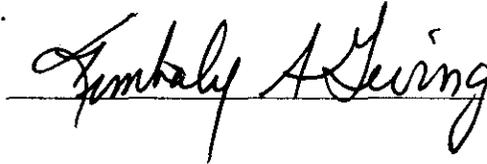
Bill Richardson, General Counsel
Illinois Dept. of Natural Resources
One Natural Resources Way
Springfield, Illinois 62702-1271

Matt Dunn
Environmental Bureau Chief
Office of the Attorney General
James R. Thompson Center
100 W. Randolph, 12th Floor
Chicago, Illinois 60601

Richard McGill, Jr.
Illinois Pollution Control Board
100 W. Randolph St.
Suite 11-500
Chicago, Illinois 60601

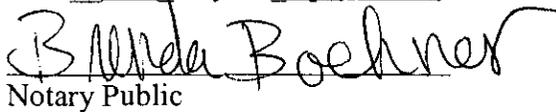
(Service List)

and mailing them (First Class Mail) from Springfield, Illinois on April 13, 2006, with sufficient postage affixed as indicated above.



SUBSCRIBED AND SWORN TO BEFORE ME

This 13th day of April, 2006.



Notary Public



THIS FILING SUBMITTED ON RECYCLED PAPER

Party Name	Role	City & State	Phone/Fax
<u>IEPA</u> Petitioner Kimberly A. Geving, Assistant Counsel Annet Godiksen, Legal Counsel	1021 North Grand Avenue East P.O. Box 19276	Springfield IL 62794-9276	217/782-5544 217/782-9807
<u>Hodge Dwyer Zeman</u> Interested Party Christine G. Zeman Karen L. Bernoteit Katherine D. Hodge Thomas G. Safley	3150 Roland Avenue Post Office Box 5776	Springfield IL 62705-5776	217/523-4900 217/523-4948
<u>Sidley Austin LLP</u> Interested Party William G. Dickett	One South Dearborn Suite 2800	Chicago IL 60603	312/853-7000 312/853-7036
<u>EPI</u> Interested Party Bob Mankowski	16650 South Canal	South Holland IL 60473	
<u>Illinois Environmental Regulatory Group</u> Interested Party Katherine D. Hodge, Executive Director Thomas G. Safley	3150 Roland Avenue	Springfield IL 62703	217/523-4942 217/523-4948
<u>Chemical Industry Council of Illinois</u> Interested Party Lisa Frede	2250 E. Devon Avenue Suite 239	DesPlaines IL 60018-4509	
<u>Bellande & Sargis Law Group, LLP</u> Interested Party Mark Robert Sargis	19 South LaSalle Street Suite 1203	Chicago IL 60603	312/853-8188 312/782-0040
<u>Hanson Engineers, Inc.</u> Interested Party Tracy Lundein	1525 South Sixth Street	Springfield IL 62703-2886	217/788-2450 217/788-2503
<u>Conestoga-Rovers & Associates</u> Interested Party Douglas G. Soutter	8615 West Bryn Mawr Avenue	Chicago IL 60631	773/380-9933 773/380-6421
<u>Office of the Attorney General</u> Interested Party Matthew J. Dunn, Division Chief	Environmental Bureau 188 West Randolph, 20th Floor	Chicago IL 60601	312/814-2550 312/814-2347
<u>Naval Training Center</u> Interested Party Georgia Vlahos	2601A Paul Jones Street	Great Lakes IL 60088-2845	847/688-4422 847/688-6917
<u>Illinois Pollution Control Board</u> Interested Party Dorothy M. Gunn, Clerk of the Board Richard McGill, Hearing Officer	100 W. Randolph St. Suite 11-500	Chicago IL 60601	312/814-3620 312/814-3669
<u>Commonwealth Edison</u> Interested Party Diane H. Richardson	10 South Dearborn Street 35FNW	Chicago IL 60603	
<u>Clayton Group Services</u> Interested Party Monte Nienkerk	3140 Finley Road	Downers Grove IL 60515	
<u>Weaver Boos & Gordon</u> Interested Party	2021 Timberbrook Lane	Springfield IL 62702	

Elizabeth Steinhour Andrews Environmental Engineering Interested Party	3535 Mayflower Boulevard	Springfield IL 62711	
Mark Marszalek <u>Graef Anhalt Schloemer & Associates, Inc.</u> Interested Party	8501 West Higgins Road Suite 280	Chicago IL 60631-2801	
Dr. Douglas C. Hambley, P.E., P.G. Midwest Engineering Services Interested Party	4243 West 166th Street	Oak Forest IL 60452	
Erin Curley, Environmental Dept. Manager <u>Missman Stanley & Associates</u> Interested Party	333 East State Street	Rockford IL 61110-0827	
John W. Hochwarter Jeffrey Larson <u>Trivedi Associates, Inc.</u> Interested Party	2055 Steeplebrook Court	Naperville IL 60565	
Chetan Trivedi <u>Illinois Department of Natural Resources</u> Interested Party	One Natural Resources Way	Springfield IL 62702-1271	217/782-1809 217/524-9640
Stan Yonkauski William Richardson, Chief Legal Counsel <u>Suburban Laboratories, Inc.</u> Interested Party	4140 Litt Drive	Hillside IL 60162	708-544-3260
Jarrett Thomas, V.P. <u>Illinois Department of Transportation</u> Interested Party	2300 S. Dirksen Parkway Room 330	Springfield IL 62764	
Steven Gobelman Thomas Benson <u>McGuire Woods LLP</u> Interested Party	77 W. Wacker Suite 4100	Chicago IL 60601	312/849-8100
David Rieser <u>Reott Law Offices, LLC</u> Interested Party	35 East Wacker Drive Suite 650	Chicago IL 60601	312/332-7544
Raymond T. Reott Jorge T. Mihalopoulos <u>Chicago Department of Law</u> Interested Party	30 N. LaSalle Street Suite 900	Chicago IL 60602	
Charles A. King, Assistant Corporation Counsel SRAC Interested Party	2510 Brooks Drive	Decatur IL 62521	
Harry Walton			

Total number of participants: 37