

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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MAY 10 2006

STATE OF ILLINOIS
Pollution Control Board

IN THE MATTER OF:)	
)	
PROPOSED AMENDMENTS TO)	
REGULATION OF PETROLEUM)	R 04-22 (B)
LEAKING UNDERGROUND STORAGE)	(UST Rulemaking)
TANKS (35 ILL. ADM. CODE 732))	

PC# 77

IN THE MATTER OF:)	
)	
PROPOSED AMENDMENTS TO)	
REGULATION OF PETROLEUM)	R 04-23(B)
LEAKING UNDERGROUND STORAGE)	(UST Rulemaking)
TANKS (35 ILL. ADM. CODE 734))	Consolidated

NOTICE OF FILING

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Illinois Pollution Control Board
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Chicago, Illinois 60601

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Illinois Pollution Control Board
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Chicago, Illinois 60601

SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that today I have filed with the Office of the Clerk of the Illinois Pollution Control Board the Post-Hearing Comments of the Illinois Environmental Protection Agency for the March 23, 2006, Hearing, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY

By: Kyle Rominger
Kyle Rominger
Assistant Counsel

Date: May 8, 2006
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POST-HEARING COMMENTS OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY FOR THE MARCH 23, 2006, HEARING

NOW COMES the Illinois Environmental Protection Agency ("Illinois EPA"), by and through one of its attorneys, Kyle Rominger, and submits the following post-hearing comments for the March 23, 2006, hearing. The comments are divided into three sections. The first section reviews the Illinois EPA's proposed revisions to the scope of work for the lump sum payment amounts, its personnel/time breakdown for the scope of work, and its proposed amendments to Sections 732.845 and 734.845. Included in this first section are some revisions that were not included in the Illinois EPA's previous submissions. The second section of these comments reviews the amounts allowed for professional consulting services under proposed Sections 732.845 and 734.845. The third section contains comments on specific issues raised in pre-filed testimony and the March 23, 2006, hearing.

Some of the issues continuing to be raised in this Docket B, such as requiring the Illinois EPA to develop and administer a cost database or to develop and use what amounts to unpublished rate sheets, were raised and addressed in the Docket A portion of this rulemaking. The Illinois EPA's positions on these issues has not changed. In the interest of brevity, these issues will not be re-addressed in these comments except as noted below.

I. Illinois EPA's Proposed Scope of Work Revisions, Personnel and Time Breakdown, and Amendments to Sections 732.845 and 734.845

As the Board requested, the Illinois EPA reviewed the Board's proposed scope of work for the professional consulting services lump sum payment amounts and submitted proposed revisions to the scope of work. See Exh. 116 (First column of Attachments 1 and 2). The Illinois EPA also provided the requested breakdown of the personnel and time needed to complete the scope of work. See Id. (Second and third columns of Attachments 1 and 2). In the Illinois EPA's personnel/time breakdown all hours are rounded up, and each personnel title listed is the highest paid title that would be reasonable for the work being performed.

After reviewing the testimony pre-filed for the March 23, 2006, hearing, the Illinois EPA proposed additional revisions to the scope of work and revised its personnel/time breakdown to address some of the issues and concerns raised in the testimony. These revisions were submitted at the hearing as Exhibits 117 and 118. The lump sum payment amounts derived from the personnel/time breakdown were included in the proposed amendments to Sections 732.845 and 734.845 submitted as exhibits 121

and 122.¹ The lump sum payment amounts included in proposed Sections 732.845 and 734.845 are based on the highest hourly rates allowed for each personnel title listed in the Illinois EPA's personnel/time breakdown. As noted by Doug Clay, the Illinois EPA often sees work performed by persons with lower pay rates than the titles assigned in the Illinois EPA's personnel/time breakdown; for example, a "Scientist" or "Technician" often performs work that is assigned the title of "Project Manager" under the Illinois EPA's personnel/time breakdown. Exh. 116 at 4; Tr. of March 23, 2006, hearing at 16-17, 18-19.

The proposed revisions to Section 732.845 and 734.845 also included the following changes to, inter alia, address comments and concerns raised in pre-filed testimony:

- 1) The addition of half-day unit rates for early action field work and field oversight that was previously included in the lump sum for the preparation and submission of the 20 and 45 Day reports. See Exhs. 121 (proposed Sections 732.845(a)(2)(A), (B), and (F)) and 122 (proposed Sections 734.845(a)(2)(A), (B), and (F)). Moving this work to unit rates provides consistency with other field work and field oversight.
- 2) The addition of language clarifying that costs associated with the monitoring and mitigation of fire, explosion, and vapor hazards are to be reimbursed on a time and materials basis. See Exhs. 121 (proposed Section 732.845(a)(4)) and 122 (proposed Section 734.845(a)(4)). Because these situations are rarely encountered, the Illinois EPA anticipated that these costs could be addressed under the unusual or extraordinary circumstances provisions of Sections 732.860 and 734.860. This change helps clarify that the costs will be reimbursed on a time and materials basis.
- 3) The addition of a lump sum payment amount for costs associated with obtaining access to off-site properties that exceed the applicable remediation objectives. See Exhs. 121 (proposed Section 732.845(d)(3))

¹ The base text for the Illinois EPA's proposed revisions to Sections 732.845 and 734.845 is the text of Sections 732.845 and 734.845 as revised by the amendments proposed in the Board's January 6, 2006, Opinion and Order. The Illinois EPA's proposed revisions to this base text are indicated by double underline and double strike through.

and 122 (proposed Section 734.845(b)(7)). The “best efforts” required in obtaining off-site access are set forth in 35 Ill. Adm. Code 732.411 and 734.350.

- 4) The addition of a lump sum payment amount for costs associated with the preparation and submission of the Stage 3 site investigation plan. See Exh. 122 (proposed Section 734.845(b)(5)). Providing a lump sum payment amount for the Stage 3 site investigation plan provides consistency with the corresponding site investigation plan under Part 732, the high priority off-site investigation plan, and with other plans and reports subject to lump sum payment amounts. Like the high priority off-site investigation plan and the other plans and reports, the preparation and submission of the Stage 3 site investigation plan is relatively standard. It is not subject to such variability that payment on a time and materials basis is necessary. Therefore, providing payment on a lump sum basis is reasonable.

In addition to the above, the Illinois EPA proposes the following new revisions to address hours related to the preparation and submission of applications for payment for site investigation costs. These revisions were inadvertently left out of the Illinois EPA’s earlier submissions.

- 1) Consistent with the time allowed for applications for payment of site investigation costs under Part 734, the Illinois EPA proposes to add eight hours of Account Technician time to the work included under “Section 732.845(d)(1)(B) Preparation and submission of investigation plans for off-site contamination for sites classified pursuant to 732.307.” This change is shown on page 19 of Attachment A to these comments under item 4 and new item 5 of “Section 732.845(d)(1)(B) Preparation and submission of investigation plans for off-site contamination for site classified pursuant to 732.307.”

This change increases the lump sum payment amount for the preparation and submission of off-site investigation plans under Section 732.845(d)(1)(B) from \$3,650 to \$4,090. This increase is reflected in Attachments C through F to these comments, which contain revised summaries of the lump sum payment amounts and revised Sections 732.845 and 734.845.

- 2) Consistent with the above change and the time allowed for applications for payment of site investigation costs under Part 734, the Illinois EPA proposes to add eight hours of Account Technician time to the tasks listed under “Section 732.845(d)(5) Preparation and submission of corrective

action plan (Conventional Tech).” This change is shown on page 21 of Attachment A to these comments under item 7 and new item 8 of “Section 732.845(d)(5) Preparation and submission of corrective action plan (Conventional Tech).” Please note that if off-site investigation is not required, and therefore no off-site investigation plan is submitted, these hours will apply to the preparation and submission of the application for payment of on-site investigation costs instead of off-site investigation costs.

This change increases the lump sum payment amount for the preparation and submission of conventional technology corrective action plans from \$5,230 to \$5,670. This increase is reflected in Attachments C through F to these comments.

- 3) In addition to the above, the Illinois EPA proposes to amend the scope of work for Part 734 to reflect the fact that the application for payment addressed in line 7 of “Section 734.845(b)(9) Preparation and submission of site investigation completion report” may not always be for costs associated with the Stage 3 site investigation. The application for payment will be for costs associated with a Stage 3 site investigation if a Stage 3 investigation is required. However, if a Stage 3 investigation is not required, the application for payment will be for costs associated with the Stage 2 investigation. Likewise, if a Stage 2 investigation is not required, the application for payment will be for costs associated with the Stage 1 investigation. This revision is included on page 13 of Attachment B to these comments. This revision does not cause a change in the lump sum payment amounts.

II. Amended Sections 732.845 and 734.845

As noted above, the lump sum payment amounts in the Illinois EPA’s proposed amendments to Sections 732.845 and 734.845 are based upon the highest pay rate for each personnel title identified in the Illinois EPA’s personnel/time breakdown. Under the proposed amendments to Section 734.845, the lump sum payment amounts alone provide up to \$27,795 for professional consulting services. In addition to the lump sum payment amounts, proposed Section 734.845 provides the following on a unit rate basis:

- 1) Up to \$1,170 for early action site visits. (proposed Sections 734.845(a)(2)(A), (B), and (F));
- 2) Up to \$3,900 to oversee tank removal. (Section 734.845(a)(2)(C));

- 3) \$390 to oversee a tank line repair. (Section 734.845(a)(2)(E));
- 4) \$390 for each 225 cubic yards of soil, or fraction thereof, removed and disposed of. (Sections 734.845(a)(2)(C) and (c)(2)(A));
- 5) \$390 for every four borings that are drilled. (Sections 734.845(a)(2)(D), (b)(2)(A), (b)(4)(A), (b)(6)(A), and (d)(1)(A));
- 6) \$390 for each half-day of free product removal oversight. (Section 734.845(a)(6));
- 7) \$925 for each free product removal report. (Section 734.845(a)(7));
- 8) \$390 for each monitoring well installed. (Sections 734.845(b)(2)(B), (b)(4)(B), (b)(6)(B), and (d)(1)(B));
- 9) \$400 for each off-site property requiring access. (proposed Section 734.845(b)(7));
- 10) \$800 for each Environmental Land Use Control and Highway Authority Agreement. (Section 734.845(c)(3)); and
- 11) Up to \$300 per day for travel. (Section 734.845(e)).

Section 734.845 also allows payment for the following on a time and materials basis:

- 1) Costs associated with monitoring and mitigating fire, explosion, and vapor hazards. (proposed Section 734.845(a)(4)).
- 2) Costs associated with the preparation and submission of free product removal plans. (Section 734.845(a)(5)).
- 3) Costs associated with the installation of free product removal systems. (Section 734.845(a)(5)).
- 4) Costs associated with the preparation and submission of alternative technology corrective action plans. (Section 734.845(c)(1)).
- 5) Costs associated with alternative technology field work and field oversight (e.g., installation, operation, maintenance, etc.). (Section 734.845(c)(2)(B)).

• There have been arguments raised that Sections 732.845 and 734.845 must provide the same amount of payment as allowed in the past in order to be considered reasonable. The Environmental Protection Act does not require payments from the Fund to equal or exceed amounts paid in the past in order to be considered reasonable. However, the payment amounts provided under Sections 732.845 and 734.845 are consistent with the amounts paid in the past. According to USI's additional testimony submitted at the March 23, 2006, hearing, "[i]t is a fact, based upon USI's analysis of the costs data related to the 69 sites that it reviewed in the summer of 2005[,] that the historical costs of professional consulting services averages approximately twenty eight percent (28%) of the total amount reimbursed per site." Exh. 129 at 9. As Doug Clay testified in Docket A, the average total amount paid per site for sites closed during the years 1997 through 2001 was the following:

<u>Year incident closed</u>	<u>Average of total amount paid per incident</u>
1997	\$86,266
1998	\$95,707
1999	\$82,819
2000	\$75,759
2001	\$92,190

Exh. 88 at 16-17. Based upon USI's analysis showing that professional consulting services account for approximately 28% of the total costs paid per site, the average amounts paid for professional consulting services during the years 1997 through 2001 ranged from \$21,213 to \$26,798. The average paid for professional consulting services over all of these years would have been approximately \$24,233.

The proposed lump sum payment amounts alone exceed the above historical averages. The lump sum payment amounts can be considered the "base" amount allowed for professional consulting services. Added to this base amount are all of the payments

provided on either a unit rate or a time and materials basis, such as the payments allowed for costs associated with tank pulls, early action site visits, free product recovery, free product removal reports, soil borings, monitoring well installations, soil excavation and disposal, alternative technologies, travel, off-site property access, and institutional controls.

Like the rest of Subpart H, proposed Sections 732.845 and 734.845 are structured in a manner that allows payment from the Fund to be tailored to site-specific circumstances. The lump sum payment amounts provide a base amount for work that is relatively standard from site to site and where it is reasonable to assign lump sums. The payments amounts provided on a unit rate or a time and materials basis provide the flexibility needed to address work that may vary more greatly from site to site and where lump sums cannot easily be assigned. The Illinois EPA believes that the payment amounts allowed under in proposed Sections 732.845 and 734.845 will provide reimbursement of reasonable costs for professional consulting services.

III. Comments on Specific Issues

The following are comments on specific issues raised in pre-filed testimony or at the March 23, 2006, hearing:

A. Sections 732.606(ddd) and (eee) and Sections 732.630(aaa) and (bbb)

The Illinois EPA does not believe that any of the testimony submitted in this Docket B requires the Board to reverse its adoption of Sections 732.606(ddd) and (eee) and 732.630(aaa) and (bbb). The following are comments on individual issues related to these Sections.

1) CW3M continues to assert that Sections 732.606(ddd) and 732.630(aaa) force less stringent remediation objectives upon property owners. This issue was raised and addressed in Docket A. See, e.g., PC #4 at 10-12. In sum, the Tiered Approach to Corrective Action Objectives regulations of 35 Ill. Adm. Code 742 (“TACO”) are designed so that remediation objectives developed under Tier 2 are as equally protective as remediation objectives developed under Tier 1 or Tier 3. Tier 2 objectives, however, are generally less expensive to achieve.

2) Also carried over from Docket A is the implication that Sections 732.606(ddd) and 732.630(aaa) will not provide adequate protection of property values. This issue was also raised and addressed in Docket A. See, e.g., PC #4 at 11. The Leaking Underground Storage Tank (“LUST”) Program does not require protection of property values. It requires remediation in accordance with TACO, which is designed to protect human health, not property values. Additional remediation that is conducted to protect property values or to make property more marketable exceeds the minimum requirements of the LUST Program, and the costs associated with such remediation are not eligible for reimbursement.

3) There have been assertions that the use of a groundwater ordinance in accordance with TACO may result in persons being exposed to contamination that TACO allows to be left in place. Scenarios given as examples include the possible ingestion of contaminated groundwater that eventually finds its way into drinking water and vapor hazards that may be caused by contaminated groundwater.

The issue of whether a groundwater ordinance used in accordance with TACO does or does not provide adequate protection of human health is an issue to debate in a TACO rulemaking, not in a LUST rulemaking. If there is a desire to see remediation of the contaminated groundwater that TACO allows to be left in place, amendments to the TACO regulations should be sought. Any changes to TACO will then apply to the remediation of LUST sites. Under the current LUST regulations, however, cleaning up contaminated groundwater that is not required to be remediated under TACO exceeds the minimum requirements of the LUST Program. Therefore the costs of such clean up are ineligible for reimbursement from the Fund. See 415 ILCS 5/57.7(c)(3) (as amended by P.A. 92-554).

At the March 23, 2006, hearing, there was some discussion about the possibility of vapor intrusion pathway requirements being added to TACO at some point in the future and the subsequent impact on the LUST Program. As Gary King noted at the hearing, the Illinois EPA has yet to develop a proposal for such changes to TACO. See, e.g., Tr. of March 23, 2006, hearing at 102, lines 5-11. At this time, any discussion of what the Board may or may not eventually adopt as TACO amendments is pure speculation. Id. If at some point in the future the Board adopts rules addressing vapor intrusion, and as a result the existing payment amounts for professional consulting services need to be amended, the Illinois EPA could address vapor intrusion costs under the unusual or extraordinary circumstances provisions of Sections 732.860 and 734.850 until the LUST rules can be properly amended to address the costs. See, e.g., Id. at 102, lines 12-22 (testimony of Doug Clay).

B. Hours Certified by Harry Chappel

At the March 23, 2006, hearing USI presented testimony regarding personnel hours certified by Harry Chappel while he was in private practice. See Exh. 129 at 10-11, Attachment E. USI's testimony is offered to show that the number of hours certified by Mr. Chappel for two incidents exceed the number of hours in the Illinois EPA's personnel/time breakdown.

Subsequent to the March 23, 2006, hearing Mr. Chappel reviewed the Illinois EPA's files for both of the incidents cited by USI. Mr. Chappel could not recreate the hours USI claims that he certified in a corrective action budget for Incident #960101, or the hours USI claims that he certified in early action billing packages for Incident #981263. Furthermore, Mr. Chappel could not find any corrective action billing packages that he had certified for Incident #981263.

Regardless of the number of hours certified by Mr. Chappel, a review of the work associated with the hours he certified shows that USI's comparison is improper. The corrective action budget hours that Mr. Chappel certified for Incident #960101 were for alternative technologies. Under proposed Sections 732.845 and 734.845, professional consulting services associated with alternative technologies are subject to payment on a time and materials basis, not a lump sum basis. See proposed Sections 732.845(d)(5) and 734.845(c)(1). Therefore, the hours certified by Mr. Chappel are not hours that would be included in the "Subdocket A" or "Subdocket B" hours cited by USI in Attachment E of Exhibit 129 (i.e., hours used to develop lump sum payment amounts).

The hours certified by Mr. Chappel for Incident #981263 were associated with free product removal. Like alternative technologies, professional consulting services

associated with free product removal are not subject to lump sum payment amounts. They are instead subject to payment on either a time and materials or a unit rate basis. Costs associated with free product removal plans and the installation of free product removal systems are subject to payment on a time and materials basis. See Sections 732.845(a)(5) and 734.845(a)(5). Costs associated with free product removal field work and field oversight, and costs associated with the preparation and submission of free product removal plans, are subject to payment on a unit rate basis. See Sections 732.845(a)(6) and (7) and 734.845(a)(6) and (7). Again, the hours certified by Mr. Chappel are not hours that would be included in the “Subdocket A” or “Subdocket B” hours cited by USI in Attachment E of Exhibit 129. USI is comparing apples to oranges. Its comparison is therefore inappropriate.

C. Use of Hourly Rates Alone

At the March 23, 2006, hearing, there was an implication that the rates adopted by the Board in Docket A at Sections 732.Appendix E and 734.Appendix E are all that the Illinois EPA needs to determine whether professional consulting services costs are reasonable. See Tr. of March 23, 2006, hearing at 89-90, 181 (questions by Jay Koch). The hourly rates charged for professional consulting services are only a part of the equation. The amount of time that can reasonably be billed for a particular activity is also a factor. Both the hourly rates and the amount of time billed must to be taken into account when determining whether the resulting costs are reasonable.

Gary King noted at hearing that the Illinois EPA’s lack of legal tools for controlling costs being paid from the Fund have resulted in overpayments from the Fund. Tr. of March 23, 2006, hearing at 181. While the regulations adopted in Docket A

provide the Illinois EPA with tools to help control the payments for many costs, they do not provide adequate tools to help control the payments for professional consulting services. Proposed Sections 732.845 and 734.845 are needed to help ensure that payments from the Fund for professional consulting services are for reasonable costs.

D. Variability of Plans and Reports Between Sites

There have been assertions that the proposed scope of work does not adequately take into account the variability that may exist between sites, such as the number of tanks removed, the number of samples collected, the number of borings drilled, and the number of wells installed. The proposed scope of work is used to develop lump sum payment amounts. Therefore, it includes work that is sufficiently standard that a lump sum payment amount is a reasonable method of providing payment. It does not include work that is subject to such variability that payment on a unit rate or a time and materials basis is necessary.

Most of the scope of work deals with the preparation and submission of plans and reports. Taking into consideration the lump sum payment amounts for the preparation and submission of plan and reports, and all of the costs included in the lump sum payment amounts, the time it takes to address variables such as the number of tanks, samples, borings, or wells is negligible. For example, once a 45- Day Report is prepared, it takes little time to add tank-specific information for additional tanks. Likewise, once a site map is created, it takes little time to add the location of additional borings or wells. The work required to prepare and submit a plan or report is sufficiently standard that a lump sum payment amount is a reasonable method of providing payment. Furthermore, by rounding up the hours in its personnel/time breakdown and basing lump sum payment

amounts on the highest pay rate for each personnel title, the Illinois EPA has proposed lump sum payment amounts sufficient to cover the variables that exist in the preparation and submission of plans and reports.² The Illinois EPA believes that, as a whole, the payment amounts set forth in proposed Sections 732.845 and 734.845 are sufficient to account for the variability that exists between sites.

E. Work Not Included in the Proposed Scope of Work

In Attachment C to its pre-filed testimony USI identifies regulations that are not explicitly covered by the proposed scope of work. See Exh. 128 at 25. USI is correct that the proposed scope of work does not address some of the regulations. This is because the scope of work only includes items that are subject to lump sum payment amounts. It does not include work that is reimbursed on a unit rate or a time and materials basis. For example, items related to free product removal requirements are not included in the scope of work because costs associated with free product removal are subject to payment on a unit rate or a time and materials basis, depending on the work being performed. See, e.g., proposed Sections 734.845(a)(5) and (7). Likewise, items related to alternative technologies are not included in the proposed scope of work because costs associated with alternative technologies are subject to payment on a time and materials basis. See, e.g., proposed Section 734.845(c)(1). USI's comments fail to recognize that much of the work required to comply with the LUST regulations is subject to payment on a unit rate or a time and materials basis, and therefore is not included in the proposed scope of work used to develop the lump sum payment amounts.

² Please note that the preparation and submission of plans and reports for free product removal and for alternative technologies are not included in the proposed scope of work because of the greater variability involved with these plans and reports.

In Attachment D to its pre-filed testimony USI provides four examples of work required by the regulations but not explicitly referenced in the scope of work proposed in the Board's January 5, 2006, Opinion and Order. See Exh. 128 at Attachment D.

Payment for this work is addressed in the revisions proposed by the Illinois EPA:

- 1) Payment for activities required under Section 734.210(a), other than the mitigation of fire, explosion, or vapor hazards pursuant to Section 734.210(a)(3), is addressed in proposed Section 734.845(a)(2)(A). Payment for activities associated with the mitigation of fire, explosion, or vapor hazards pursuant to Section 734.210(a)(3) is addressed in proposed Section 734.210(a)(4).
- 2) Payment for activities required under Section 734.210(b), other than continued monitoring and mitigation of fire, explosion, or vapor hazards pursuant to Section 734.210(b)(3), is addressed in proposed Section 734.845(a)(2)(B). Payment for activities associated with continued monitoring and mitigation of fire, explosion, or vapor hazards pursuant to Section 734.210(b)(3) is addressed in proposed Section 734.845(a)(4).
- 3) Work associated with the preparation and submission of applications for payment is included in the Illinois EPA's proposed revisions to the scope of work and in its personnel/time breakdown. Payment for this work is included in the corresponding lump sum payment amounts.
- 4) Payment for conducting "best efforts" to obtain off-site access is addressed in proposed 734.845(b)(7).

F. Need for Scope of Work to Track the Regulations

There has been a call for the scope of work to track the requirements of the regulations. The scope of work proposed by the Board does track the requirements of the regulations. The items in the scope of work are organized according to the regulatory provisions they help satisfy. Furthermore, many items are based upon LUST Program forms. These forms describe the work an owner or operator must complete in order to comply with the regulations. By completing the work required in the forms, an owner or

operator complies with the LUST regulations. Therefore, a scope of work keyed to the LUST forms tracks the requirements of the regulations.

The Illinois EPA believes the scope of work proposed by the Board is organized in a reasonable and appropriate manner that allows payment from the Fund to track the LUST regulations. It also allows payment to track the logical progression of LUST site cleanups.

Conclusion

The Illinois EPA believes the payment amounts allowed under proposed Sections 732.845 and 734.845 will provide reimbursement of reasonable costs for professional consulting services. The Illinois EPA respectfully requests that the Board proceed with the adoption of Sections 732.845 and 734.845 as proposed by the Illinois EPA, copies of which are included in Attachments E and F of these comments.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY



Kyle Rominger
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ATTACHMENT A TO IEPA'S POST-HEARING COMMENTS
SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
Section 732.845(a)(1) Preparation for the abandonment or removal of USTs			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Office of the Illinois State Fire Marshal (OSFM) 1. Prepare and submit initial Notification Form for Underground Storage Tanks 2. Prepare Application for Permit for Removal/Abandonment of Underground Storage Tanks and submit to owner/operator for signature 3. Submit Application for Permit for Removal/Abandonment to OSFM 4. Prepare and submit LUST Fund Eligibility and Deductibility Application 5. Prepare and submit amended Notification Form	Tech	1	2.a.1, 2, 3 & 5 are performed by tank removal contractor and costs are included in tank removal lump sum.
b. Illinois Environmental Protection Agency (IEPA) 1. Prepare and submit early action extension 2. Follow up	PM	1	Not required in all cases.
c. Correspond with and update client			Not corrective action.
3. Waste Disposal a. Determine early action excavation limits	PM	1	
b. Prepare waste profile and arrange for landfill approval	Tech	2	See Section 732.845(a)(2) for field work.
c. Prepare waste manifests or tracking forms	PM	1	
4. Plan and Report Preparation a. Prepare site health and safety plan	PM	2	
5. Resource Coordination a. Arrange for subcontractors (e.g., excavator, tank removal contractor, backfill, landfill) b. Schedule project	PM	4	

Scope of Work

Scope of Work	Personnel	Hours	Comments
c. Call J.U.L.I.E. and/or municipality to locate utilities			Task performed by tank removal contractor. Cost included in tank removal lump sum.
Section 732.845(a)(3) Preparation and submission of 20-day and 45-day reports			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with Agency b. Correspond with and update client			2.a. already included in other line items and 2.b. is not corrective action.
3. Records Gathering a. Obtain and review IEPA and/or OSFM records b. Obtain and review well records from ISGS and ISWS c. Obtain and review local information (e.g. Sanborn maps, aerial overlays)			3.a. and c included in hours for preparation of 45-day Report. 3.b. not required for preparation of 20 or 45-day Reports.
4. Waste Disposal a. Review disposal documentation	PM	1	
5. Technical Evaluation a. Prepare well location map (<25 records within 2500 feet) b. Determine expected local site geology (subsurface soil conditions)			a. not required for preparation of 20 or 45-day Reports. b. included in hours for preparation of 45-day Report.
6. Plan and Report Preparation a. Prepare 20-day Certification	PM	1	
b. Prepare or revise site health and safety plan			Previously prepared under 732.845(a)(1) task 4.a. No revision necessary for preparation and submission of 20 and 45-day reports.

Scope of Work	Personnel	Hours	Comments
<p>c. Prepare 45-day Report</p> <ol style="list-style-type: none"> 1. Provide information pertaining to: <ol style="list-style-type: none"> A. Site Identification B. Release Information C. Early Action D. Site Information <ol style="list-style-type: none"> 1. Nature and estimated quantity of release 2. Data concerning: <ol style="list-style-type: none"> a. Surrounding populations b. Water quality c. Use and approximate locations of wells potentially affected by the release d. Subsurface soil conditions e. Location of subsurface sewers f. Climatological conditions g. Land use 3. A discussion of what was done to measure for the presence of a release 4. Action taken to prevent further release of the regulated substance into the environment 5. A discussion of the action taken to monitor and mitigate fire and safety hazards posed by vapors of free product that has migrated from the UST excavation zone and entered subsurface structures 	PM	8	
<p>E. Supporting Documentation</p> <ol style="list-style-type: none"> 1. Site map to scale and oriented north showing: <ol style="list-style-type: none"> a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc.) e. Nearby structures (buildings, roads, etc.) f. Soil boring(s) (if present) g. Monitoring well(s) and/or sumps (if present) h. Property boundaries i. Sample location points 2. Area map showing the site in relation to surrounding properties. This map should identify the facilities on the surrounding properties 3. Cross-section, to scale, showing the USTs and the excavation 	CAD Operator	8	
<p>4. Analytical/screening results in tabular format, including the results of soil samples required pursuant to 35 Ill. Adm. Code 732.202(h) or 45 ILCS 5/57-57.17.</p>	PM	2	

Scope of Work

Scope of Work	Personnel	Hours	Comments
5. UST information in a tabular format, including: <ul style="list-style-type: none"> a. Total number of UST(s) on site b. Volume of the UST(s) (in gallons) c. The material stored in the UST(s) d. Identification of UST system(s) that had a release e. Identification of UST system(s) that were repaired, removed, or abandoned in-place 			UST information table included on Agency forms under 6.c.1.B. above (Release Information)
6. Copy of OSFM Permits or notifications	Admin Asst	1	6, 8 & 9 combined for total of 1 hour.
7. Narrative of tank removal and cleaning operations; describe how wastes generated during the tank removal were managed, treated, and disposed of	PM	1	
8. Photographs of UST removal activities and the excavation 9. Copies of waste manifests for soil and groundwater transported off-site			6, 8 & 9 combined for total of 1 hour.
d. Review and certification of 20-Day and 45-Day Reports and application for payment.	LPE or LPG	1	Certification added to IPCB's proposal. PM/Senior staff reference deleted. Added reference to application for payment.
7. Resource Coordination <ul style="list-style-type: none"> a. Call J.U.L.I.E. and/or municipality to locate utilities 			Already done prior to tank removal. Not required for preparation and submission of 20 and 45-day reports.
8. Distribution <ul style="list-style-type: none"> a. Deliver draft 20-day Certification and 45-Day Report and application for payment to owner/operator for review and signature b. Make copies of 20-Day Certification and 45-Day Report and application for payment for distribution c. Deliver completed 20-Day Certification and 45-Day Report and application for payment to IEPA and owner/operator 	Admin Asst	2	Covers all copying and delivering costs. Added references to application for payment.
9. Prepare applications for payment	Account Tech	8	This is added to IPCB's proposal.
Section 732.845(a)(6) Preparation and submission of free product removal reports			
1. Project Management			All Project Management work is identified under Personnel Column as PM.

Scope of Work	Personnel	Hours	Comments
2. Correspondence a. Correspond with and update Illinois Environmental Protection Agency (IEPA) b. Correspond with and update client			2.a. already included in other line items and 2.b. is not corrective action.
3. Waste Disposal a. Review disposal documentation	PM	1	
4. Free Product Report Preparation a. Prepare Free Product Removal Report 1. Provide information pertaining to: A. Site Identification B. Free Product Information 1. Name(s) of person(s) responsible for implementing the free product removal measures 2. Estimated quantity, type, and thickness of free product observed or measured in boreholes, wells, excavation, etc. 3. The type of free product recovery system used and technical justification for the method of recovery chosen 4. Whether any discharge will take place on- or off-site during the recovery operation and where this discharge (point) will be located 5. Type of treatment applied to (the free product), and the effluent quality expected from any discharge 6. Steps that have been taken or that are being taken to obtain necessary permits for any discharge 7. The disposition of the recovered free product	PM	4	
C. Supporting Documentation 1. Site map to scale and oriented north showing: a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc.) e. Nearby structures (buildings, roads, etc.) f. Soil boring(s) (if present) g. Monitoring well(s) and/or sumps (if present) h. Locations where free product was encountered including its estimated thickness i. Location of recovery points j. Location of the treatment unit k. Location of discharge points l. Property boundaries	CAD Operator	1	Site map already prepared under Early Action. Only modifications required at this point.
2. Table showing the dates that free product recovery was conducted and the amount of free product recovered on each date	PM	1	

Scope of Work	Personnel	Hours	Comments
3. Copies of waste manifests	Admin Asst	1	
5. Review and certification of free product removal report.	LPE or LPG	1	Added to IPCB's proposal.
6. Distribution a. Deliver draft free product removal report to owner/operator for review and signature b. Make copies of free product removal report for distribution c. Deliver completed report to IEPA and owner/operator	Admin Asst	2	Covers all copying and delivering costs.
Section 732.845(a)(7) Preparation and submission of reports submitted pursuant to Section 732.202(h)(3)			
1. Site characterization/narrative 2. Characterization/narrative of water encountered in UST excavation 3. Completion of Property Owner Summary Form 4. Recording NFR Letter	PM Admin Asst	2 2	This report submitted as part of 45-Day Report. All other costs related to this report are included in costs for 45 Day Report (e.g., LPG/LPE certification, distribution). Reference in title to "734.210(h)(3)" changed to "732.202(h)(3)"
Section 732.845(b)(1) Preparation and submission of site classification plans, site classification preparation, fieldwork, field oversight, and the preparation and submission of the site classification completion report			
SITE CLASSIFICATION WORK PLAN			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with Agency b. Correspond with and update client			2.a. already included in other line items and 2.b. is not corrective action.
3. Technical Evaluation a. Conduct fieldwork b. Provide field oversight	PM Geologist Tech	10 10 20	These hours include field work that is not covered under the half-day rates. There are no half-day rates for Site Classification field work.

Scope of Work	Personnel	Hours	Comments
<p>4. Plan Preparation</p> <p>a. Prepare Site Classification Work Plan</p> <p>1. Provide information concerning:</p> <p>A. Site Identification</p> <p>B. Site Information</p> <p>C. Site Classification</p> <p>1. Method of Physical Soil Classification</p> <p>2. Number of soil borings to be advanced on-site</p> <p>3. Whether soil borings are proposed to be advanced for reasons other than Physical Soil Classification or investigation of migration pathways</p> <p>4. Whether monitoring wells are proposed on-site</p> <p>5. Physical Soil Classification</p> <p>a. Scientific publications/geologic maps that will be reviewed to determine consistency with Plate 1 of the Illinois State Geological Survey Circular 532</p> <p>b. Drilling methods, auger types, sampling procedures and sampling devices that will be used</p> <p>c. Basis for determining the location (include number and spacing) of soil borings</p> <p>d. How the proposed final soil boring configuration and boring depths will provide the greatest likelihood of determining the geologic characteristics of the site</p> <p>e. What will be done if auger refusal occurs or bedrock is encountered during drilling</p> <p>f. What will be done if anomalies are encountered during drilling</p> <p>g. What will be done to prevent cross-contamination between water-bearing units that may be encountered during drilling</p> <p>6. Groundwater Investigation</p> <p>a. Drilling methods that will be used</p> <p>b. Basis for determining the location and number of monitoring wells placed at the site</p> <p>c. Monitoring well installation procedures</p> <p>d. Activities that will be taken to prevent cross-contamination during well installation</p> <p>e. Basis for determining well construction material</p> <p>f. Basis for determining the monitoring well-screen depth and screened interval</p> <p>g. Monitoring well development procedures</p> <p>h. Monitoring well sampling procedures</p> <p>i. Activities that will be taken to prevent cross-contamination between groundwater samples</p> <p>j. How the proposed final monitoring well configuration will provide the greatest likelihood of detecting the migrations of groundwater contamination</p> <p>k. Steps that will be taken to determine groundwater elevation and flow direction.</p> <p>7. How the LPE/LPG will verify whether Class III Special Resource Groundwater exists within 200 feet of the UST system</p> <p>8. How the LPE/LPG will identify and locate all community water supply wells within 2,500 feet of the UST system and all potable water supply wells within 200 feet of the UST system, and determine if the UST system is within the regulated recharge area of any community water supply well or potable water supply well</p> <p>9. How the LPE/LPG will locate all surface water bodies within 100 feet of the UST system and determine whether they have been adversely affected by the a sheen or free product</p>	PM	8	<p>Under 4.a.1.c.7 and 8, reference to LPG added.</p> <p>Under 4.a.1.c.7, reference to "Class II" groundwater changed to "Class III".</p> <p>Section 4.a.1.c.9 (Classification by Exposure Pathway Exclusions) of the Board's proposed scope of work is deleted because classification by exposure pathway is no longer an option under Part 732.</p> <p>IEPA added new Sections 4.a.1.c.9 and 9.5.</p>

Scope of Work

Scope of Work	Personnel	Hours	Comments
9.5. How the LPE/LPG will determine whether there is evidence of petroleum or vapor migration that threatens human health or safety or that may cause explosions in confined spaces			
10. Site map to scale and oriented north showing: <ul style="list-style-type: none"> a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc) e. Nearby structures (buildings, roads, etc.) f. Location of the proposed soil boring(s) g. Location of the proposed monitoring wells (if required) h. Property boundaries i. 200-foot radius from the UST system 	CAD Operator	2	Site map already prepared under Early Action. Only modifications required at this point.
11. Chart indicating the following: <ul style="list-style-type: none"> a. Boring identification b. Depth of boring (in feet) c. Number of samples from each boring that will be submitted for geotechnical analysis d. Identification of geotechnical tests that will be performed on samples 	PM	1	
b. Prepare budget for site classification work plan	Account Tech	4	
c. Review and certification of site classification work plan and budget.	LPE or LPG	2	PM/Senior staff reference deleted.
5. Distribution <ul style="list-style-type: none"> a. Deliver draft site classification work plan and budget to owner/operator for review and signature b. Make copies of site classification work plan and budget for distribution c. Deliver site classification work plan and budget to IEPA and owner/operator 	Admin Asst	2	Covers all copying and delivering costs. Changed c to reference "site classification work plan and budget" instead of "completed report".
SITE CLASSIFICATION COMPLETION REPORT			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence <ul style="list-style-type: none"> a. Correspond with Agency b. Correspond with and update client 			2.a. already included in other line items and 2.b. is not corrective action.
3. Technical Evaluation <ul style="list-style-type: none"> a. Conduct fieldwork b. Provide field oversight 			Not required as part of preparing and submitting Site Classification Completion Report.

Scope of Work	Personnel	Hours	Comments
<p>4. Report Preparation</p> <p>a. Prepare Site Classification Completion Report</p> <p>1. Provide information concerning:</p> <p>A. Site Identification</p> <p>B. Site Information</p> <p>C. Site Classification Summary</p> <p>D. Site Classification by Methods One or Two</p> <p>E. Site Evaluation</p> <p>1. Physical Soil Classification</p> <p>a. Soil borings</p> <p>1. A list of publications reviewed and preliminary conclusions concerning the site geology</p> <p>2. Soil borings logs</p> <p>3. Site map to scale and oriented north showing:</p> <p>i. Soil boring locations</p> <p>ii. UST system(s)</p> <p>iii. 200-foot radius from UST system</p> <p>iv. Property boundaries</p> <p>b. Method One soil properties test results (include calculations, methodologies, and complete laboratory reports)</p> <p>1. Soil particle analysis</p> <p>2. Soil moisture content</p> <p>3. Soil classification</p> <p>4. Unconfined compression test</p> <p>5. In-situ hydraulic conductivity</p> <p>6. Ex-situ hydraulic conductivity</p> <p>c. Method Two soil properties test results (include calculations, methodologies, and complete laboratory reports)</p> <p>1. Soil particle analysis</p> <p>2. Ex-situ hydraulic conductivity; and calculated yield of geological material</p> <p>3. In-situ hydraulic conductivity and yield of geologic material</p>	<p>PM</p> <p>CAD Operator</p>	<p>8</p> <p>4</p>	<p>Site map already prepared under earlier plans/reports. Only modifications required at this point.</p>

Scope of Work

Scope of Work	Personnel	Hours	Comments
<p>2. Groundwater Investigation</p> <p>a. If groundwater investigation was required, provide the following:</p> <ol style="list-style-type: none"> 1. Discussion of how the monitoring well configuration provides the greatest likelihood of detecting migration of groundwater contamination 2. Monitoring well construction diagrams 3. Table showing static water elevations 4. Sample collection shipment and preservation information 5. Completed chain-of-custody form(s) 6. Copies of laboratory reports (include field and lab blanks) 7. Analytical results in tabular format 8. Site map to scale and oriented north showing: <ol style="list-style-type: none"> i. Monitoring well locations ii. Potentiometric surface map iii. Groundwater flow direction iv. 200-foot radius from UST system and v. Property boundaries <p>b. If no groundwater investigation was performed, provide the following:</p> <ol style="list-style-type: none"> 1. Demonstrate whether groundwater is present within the depth of boring used to perform physical soil classification under the selected method (Method One under subsection (c) or Method Two under subsection (d)) 2. Demonstrate whether groundwater is withdrawn for potable use within 1000 feet of the UST system and at what depths 3. Demonstration whether seasonal fluctuation in groundwater could result in groundwater contacting contaminated soil (e.g., historical records) 	<p>PM CAD Operator</p>	<p>4 2</p>	<p>Site map already prepared under earlier plans/reports. Only modifications required at this point.</p>
<p>F. Water Well Survey</p> <ol style="list-style-type: none"> 1. Results of the survey conducted to identify all community water supply wells within 2,500 feet of the UST system and all potable water supply wells within 200 feet of the UST system (include copies of well logs and all correspondence to and from the Illinois State Water Survey and the Illinois State Geological Survey). 2. Local units of government contacted to determine if there is a local ordinance or policy regulating the usage of potable water supply wells 3. Site map to scale showing all of the community water supply wells within 2,500 feet of the UST system and all potable water supply wells within 200 feet of the UST system (radii of 200, 400, 1,000 and 2,500 feet from the UST system should be marked on the map) 4. Table indicating the setback zone for each community or potable water supply well and the distance from the UST system to the well (the location of each well must be identified on the map by numbers corresponding to information provided in the table) 5. The sources consulted in determining whether the UST system is within the regulated recharge area of any community or potable water supply well 	<p>PM</p>	<p>4</p>	<p>Site map already prepared under earlier plans/reports. Only modifications required at this point.</p>

Scope of Work	Personnel	Hours	Comments
<p>G. Migration Pathways</p> <ol style="list-style-type: none"> 1. Discussion of the investigation conducted to identify all potential natural and man-made migration pathway that are on the site, rights-of-way attached to the site, or in any area surrounding the site that may be adversely affected as a result of a release of petroleum from the UST system 2. Discussion of further investigations conducted to determine if there is evidence that migration of petroleum or vapors along such pathways threatens human health or the environment or may cause explosions in basements, crawl spaces, utility conduits, storm or sanitary sewers, Vaults or other confined spaces 3. Discussion of the findings based on the investigations performed. 4. Site map to scale and oriented north showing: <ol style="list-style-type: none"> a. The UST system(s) and excavation b. Product and dispenser lines c. Potential natural and man-made pathways on-site, in rights-of-way attached to the site or in areas that may be adversely affected by the release d. Soil boring locations e. Property boundaries 	PM CAD Operator	3 1	Site map already prepared under earlier plans/reports. Only modifications required at this point.
<p>H. Class III Special Resource Groundwater</p> <ol style="list-style-type: none"> 1. Discussion of the steps taken to determine if Class III groundwater exists within 200 feet of the site 2. Site map to scale and oriented north showing: <ol style="list-style-type: none"> a. Location of Class II groundwater b. Radius of 200 feet from the UST system(s) <p>I. Surface Bodies of Water</p> <ol style="list-style-type: none"> 1. Discussion of the steps taken to locate all surface bodies of water on site and within 100 feet of the site, and one located, the steps taken to determine if they have been adversely affected by the presence of a sheen or free product layer resulting from a release of petroleum from the UST system 2. Site map to scale and oriented north showing the locations of the surface bodies of water on site and within 100 feet of the site 	PM	2	Site map already prepared under earlier plans/reports. Only modifications required at this point.
<p>J. Classification by Exposure Pathway Exclusion</p> <p>No longer an option</p>			Section J of the Board's proposed scope of work is deleted because classification by exposure pathway is no longer an option under Part 732.
<p>K. Supporting Documentation</p> <ol style="list-style-type: none"> 1. Site map to scale oriented north showing: <ol style="list-style-type: none"> a. UST system(s) (former and existing) b. Excavation limits (former and existing) c. Product and dispenser lines d. Pumps and islands e. Underground utilities (sewer, gas, water, etc) 	CAD Operator	4	Site map already prepared under earlier plans/reports. Only modifications required at this point and drawing of geologic cross section.

Scope of Work	Personnel	Hours	Comments
<ul style="list-style-type: none"> f. Nearby structures (buildings, roads, etc) g. Location of the soil boring(s) h. Location of the monitoring wells i. Property boundaries j. 200-foot radius from the UST system(s) 2. Horizontal cross section showing the various geologic units and the depth to groundwater			
3. Laboratory certification(s)			This is provided by laboratory along with laboratory results.
b. Review and certification of site classification completion report and application for payment.	LPE or LPG	2	PM/Senior staff reference deleted. Reference to application for payment added.
5. Distribution <ul style="list-style-type: none"> a. Deliver draft site classification completion report and application for payment to owner/operator for review and signature b. Make copies of site classification completion report and application for payment for distribution c. Deliver completed report and application for payment to IEPA and owner/operator 	Admin Asst	2	Covers all copying and delivering costs. Reference to application for payment added.
6. Prepare applications for payment	Account Tech	8	This is added to the IPCB's proposal.
Section 732.845 (c)(1) Preparation and submission of low priority groundwater monitoring plan			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence <ul style="list-style-type: none"> a. Correspond with Agency b. Correspond with and update client 			2.a. already included in other line items and 2.b. is not corrective action.
3. Waste Disposal <ul style="list-style-type: none"> a. Determine treatment type to be applied to any discharge and effluent quality expected b. Obtain necessary permits for discharge c. Determine final disposition of recovered free product 			Not required for preparation and submission of low priority groundwater monitoring plan. 3.c not applicable at low priority sites.
4. Technical Evaluation			Included in 5 below.

Scope of Work	Personnel	Hours	Comments
5. Plan Preparation a. Prepare groundwater monitoring plan 1. Provide information concerning: A. Site Identification B. Site Information C. Site Documentation 1. Proposed time table for well installation, all sampling events and report submittal 2. Discussion of: a. Monitoring well development procedures b. Monitoring well sampling procedures c. Activities that will be taken to prevent cross-contamination between groundwater samples 3. Site map to scale and oriented north showing: a. UST system(s) and excavation b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc.) e. Nearby structures (buildings, roads, etc.) f. Location of the soil borings g. Location of the existing monitoring wells h. Property boundaries i. Radius of 200 feet from the excavation j. Direction of groundwater flow 4. Discussion of the adequacy of the final monitoring well configuration to detect the migration of groundwater contamination	PM	8	Site map already prepared under earlier plans/reports. Direction of groundwater flow on Site map added to IPCB's proposal.
b. Prepare budget for groundwater monitoring plan	Account Tech	4	
c. Review and certification of groundwater monitoring plan and budget	LPE or LPG	2	PM/Senior staff reference deleted.
6. Distribution a. Deliver draft groundwater monitoring plan and budget to owner/operator for review and signature b. Make copies of groundwater monitoring plan and budget for distribution c. Deliver completed plan and budget to IEPA and owner/operator	Admin Asst	2	Covers all copying and delivering costs.
Section 732.845 (c)(3) and (c)(4) Preparation and submission of first and second year groundwater monitoring reports			Hours listed are for each year's groundwater monitoring report.
1. Project Management			All Project Management work is identified under Personnel Column as PM.

Scope of Work

Scope of Work	Personnel	Hours	Comments
2. Correspondence a. Correspond with Agency b. Correspond with and update client			2.a. already included in other line items and 2.b. is not corrective action.
3. Technical Evaluation			Included in 4 below.
4. Report Preparation a. Prepare groundwater monitoring report 1. Provide information concerning: A. Site Identification B. Site Information C. Assting Documentation 1. Description of the implementation and completion of all elements of the groundwater monitoring plan 2. Description of the well development procedures, sample collection, preservation, and analysis 3. Analytical results in tabular format 4. Copies of laboratory results 5. Laboratory certification 6. Groundwater elevations in a tabular format 7. Monitoring well logs 8. Completed chain-of-custody form(s) 9. Owner/Operator Summary form 10. Site map to scale and oriented north showing: a. UST system(s) and excavation b. Underground utilities (sewer, gas, water, etc.) c. Product and dispenser lines d. Pumps and islands e. Nearby structures (buildings, roads, etc.) f. Location of groundwater monitoring wells g. Direction of groundwater flow h. Property boundaries i. Radius of 200 feet from the UST system	PM CAD Operator	8 2	Site map already prepared under earlier plans/reports. Only modifications required at this point. 4.a.1.C.10.c and d added to IPCB's proposal.
b. Review and certification of groundwater monitoring report and application for payment.	LPE or LPG	2	PM/Senior staff reference deleted. Application for payment added.
5. Distribution a. Deliver draft groundwater monitoring report and application for payment to owner/operator for review and signature b. Make copies of groundwater monitoring report and application for payment for distribution c. Deliver completed report and application for payment to IEPA and owner/operator	Admin Asst	2	Covers all copying and delivering costs. Application for payment added.
6. Prepare application for payment	Account Tech	4	This is added to IPCB's proposal.

Scope of Work	Personnel	Hours	Comments
Section 732.845(c)(5) Preparation and submission of low priority groundwater monitoring completion report			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with Agency b. Correspond with and update client			2.a. already included in other line items and 2.b. is not corrective action.
3. Technical Evaluation			Included in 4 below.
4. Report Preparation a. Prepare groundwater monitoring completion report 1. Provide information concerning: A. Site Identification B. Site Information C. Assting Documentation 1. Description of the implementation and completion of all elements of the groundwater monitoring plan 2. Description of the well development procedures, sample collection, preservation, and analysis 3. Analytical results in tabular format 4. Copies of laboratory results 5. Laboratory certification 6. Groundwater elevations in a tabular format 7. Monitoring well logs 8. Completed chain-of-custody form(s) 9. Owner/Operator Summary form 10. Site map to scale and oriented north showing: a. UST system(s) and excavation b. Underground utilities (sewer, gas, water, etc.) c. Product and dispenser lines d. Pumps and islands e. Nearby structures (buildings, roads, etc.) f. Location of groundwater monitoring wells g. Direction of groundwater flow h. Property boundaries i. Radius of 200 feet from the UST system	PM CAD Operator	8 2	Site map already prepared under earlier plans/reports. Only modifications required at this point. 4.a.1.C.10.c and d added to IPCB's proposal.
b. Review and certification of groundwater monitoring completion report and application for payment.	LPE or LPG	2	PM/Senior staff reference deleted. Application for payment added.

Scope of Work

	Personnel	Hours	Comments
5. Distribution <ul style="list-style-type: none"> a. Deliver draft groundwater monitoring completion report and application for payment to owner/operator for review and signature b. Make copies of groundwater monitoring completion report and application for payment for distribution c. Deliver completed report and application for payment to IEPA and owner/operator 	Admin Asst	2	Covers all copying and delivering costs. Application for payment added.
6. Prepare applications for payment	Account Tech	4	This is added to IPCB's proposal.
Section 732.845(d)(1)(A) Preparation and submission of investigation plans for on-site contamination for sites classified pursuant to Section 732.307			Scope of work same as for Stage 2 site investigations under Part 734. All scope of work for this Section 732.845(d)(1)(A) added to IPCB's proposal.
1. Technical Evaluation <ul style="list-style-type: none"> a. Address the same items that are required for Part 734 sites under 35 IAC 734.320(b) b. Prepare or finalize field notes c. Prepare and describe site investigation photos 	PM CAD Operator	16 8	These hours cover technical work performed (vs. report preparation hours which are included under 2 below).
d. Prepare contingency scope of work for boring/monitoring well locations			Included under 2 below.
2. Plan Preparation <ul style="list-style-type: none"> a. Prepare investigation plan for on-site contamination <ul style="list-style-type: none"> 1. Provide information concerning: <ul style="list-style-type: none"> A. Site Identification B. Site Information <ul style="list-style-type: none"> 1. Will owner/operator seek reimbursement from the UST Fund? 2. If yes, is budget attached? 3. Is this an amended plan? 4. Identify the material released 5. Describe the activities that will be performed to determine the following: <ul style="list-style-type: none"> a. Degree of soil contamination b. Extent of soil contamination (as defined to Tier 1 Residential remediation objectives) c. The degree of groundwater contamination d. Extent of groundwater contamination (as defined to Class 1 Remediation Objectives unless otherwise approved by the Illinois EPA) e. Direction of groundwater flow f. Hydraulic conductivity of groundwater g. Identification of Site features that may affect contaminant transport and risk to human health and the environment. h. The following parameters, if determined during on-site investigation: <ul style="list-style-type: none"> Hydraulic conductivity Soil bulk density 	PM	8	

Scope of Work	Personnel	Hours	Comments
Soil particle density Moisture content Organic carbon content C. Site Investigation Summary Form			
6. Site map to scale and oriented north showing: <ul style="list-style-type: none"> a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc) e. Nearby structures (buildings, roads, etc.) f. Location of the proposed/existing soil borings g. Location of the proposed/existing monitoring wells h. Property boundaries 			Maps included under 1.a: above. Site map already prepared under earlier plans/reports. Only modifications required at this point.
b. Prepare budget	Account Tech	4	
c. Review and certification of on-site investigation plan and budget	LPE/LPG	2	
3. Resource Coordination <ul style="list-style-type: none"> a. Arrange for drilling b. Call J.U.L.I.E. and/or municipality to locate utilities 	PM	2	
4. Distribution <ul style="list-style-type: none"> a. Deliver draft plan and budget to owner/operator for review and signature b. Make copies of plan and budget for distribution c. Deliver completed plan and budget to IEPA and owner/operator 	Admin Asst	2	Covers all copying and delivering costs.
Section 732.845(d)(1)(B) Preparation and submission of investigation plans for off-site contamination for sites classified pursuant to Section 732.307			
1. Technical Evaluation <ul style="list-style-type: none"> a. Address the same items that are required for Part 734 sites under 35 IAC 734.325(b) b. Prepare or finalize field notes c. Prepare and describe site investigation photos 	PM CAD Operator	16 8	These hours cover technical work performed (vs. report preparation hours which are included under 2 below).
d. Prepare contingency scope of work for boring/monitoring well locations.			Included under 2 below.

Scope of Work

	Personnel	Hours	Comments
<p>2. Plan Preparation</p> <p>a. Prepare investigation plan for off-site contamination</p> <p>1. Provide information concerning:</p> <p>A. Site Identification</p> <p>B. Site Information</p> <p>1. Will owner/operator seek reimbursement from the UST Fund?</p> <p>2. If yes, is budget attached?</p> <p>3. Is this an amended plan?</p> <p>4. Identify the material released</p> <p>5. Describe the activities that will be performed to determine the following:</p> <p>a. Degree of soil contamination</p> <p>b. Extent of soil contamination (as defined to Tier 1 Residential remediation objectives)</p> <p>c. The degree of groundwater contamination</p> <p>d. Extent of groundwater contamination (as defined to Class 1 Remediation Objectives unless otherwise approved by the Illinois EPA)</p> <p>e. Direction of groundwater flow</p> <p>f. Hydraulic conductivity of groundwater</p> <p>g. Identification of Site features that may affect contaminant transport and risk to human health and the environment.</p> <p>h. The following parameters, if determined during off-site investigation:</p> <p>Hydraulic conductivity</p> <p>Soil bulk density</p> <p>Soil particle density</p> <p>Moisture content</p> <p>Organic carbon content</p> <p>C. Site Investigation Summary Form</p>	PM	8	
<p>6. Site map to scale and oriented north showing:</p> <p>a. UST system(s) and excavation limits</p> <p>b. Product and dispenser lines</p> <p>c. Pumps and islands</p> <p>d. Underground utilities (sewer, gas, water, etc)</p> <p>e. Nearby structures (buildings, roads, etc.)</p> <p>f. Location of the proposed/existing soil borings</p> <p>g. Location of the proposed/existing monitoring wells</p> <p>h. Property boundaries</p>			Maps included under 2.a. above. Site map already prepared under earlier plans/reports. Only modifications required at this point.
<p>b. Prepare budget</p>	Account Tech	4	
<p>c. Review and certification of off-site investigation plan and budget</p>	LPE/LPG	2	

Scope of Work	Personnel	Hours	Comments
3. Resource Coordination a. Arrange for drilling b. Call J.U.L.I.E. and/or municipality to locate utilities	PM	2	
4. Distribution a. Deliver draft plan and budget <u>and application for payment</u> to owner/operator for review and signature b. Make copies of plan and budget <u>and application for payment</u> for distribution c. Deliver completed plan and budget <u>and application for payment</u> to IEPA and owner/operator	Admin Asst	2	Covers all copying and delivering costs.
5. <u>Prepare applications for payment for on-site investigation</u>	Account Tech	8	<u>This is added to IPCB's proposal.</u>
Section 732.845(d)(3) Off-site property access Correspondence and meetings with off-site property owners	PM	4 for each off-site property	4 hours total for each off-site property to which off-site access is sought. This work moved here from the scope of work for Section 732.845(d)(1)(B) above.
Section 732.845(d)(4) Well surveys conducted pursuant to Sections 732.404(e)(1) and 734.445(b)	PM	4	Not required for all sites.
Section 732.845(d)(5) Preparation and submission of corrective action plan (Conventional Tech)			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with Agency b. Correspond with and update client			2.a. already included in other line items and 2.b. is not corrective action.
3. Waste Disposal a. Prepare waste profile (arrange for landfill approval)	Tech	4	These hours include field work that is not covered under the half-day rates.
b. Determine limits of excavation c. Estimate quantity of contaminated soil to be disposed of d. Mail waste profile to owner/operator for review and signature e. Prepare waste manifests or tracking forms	PM	4	

Scope of Work	Personnel	Hours	Comments
4. Technical Evaluation a. Estimate quantity of "clean" overburden to be stockpiled (if any).			Included in 3.b above
b. Prepare or finalize field notes c. Prepare and describe remediation photos			This work part of preparation and submission of Corrective Action Completion Report. (see items 4.b and c. under scope of work for Section 732.845(d)(8)).
5. Plan Preparation a. Prepare or review site health and safety plan			Previously prepared under 732.845(a)(1), item 4a.
b. Prepare Corrective Action Plan 1. Provide information concerning: A. Site Identification B. Site Information C. Proposed Methods of Remediation D. Soil and Groundwater Investigation Results 1. Description of investigation activities performed to define the extent of soil and/or groundwater contamination 2. Analytical results and cleanup objectives in tabular format 3. Laboratory results 4. Boring logs 5. Monitoring well logs 6. Site maps to scale and oriented north showing: a. Soil sample locations b. Monitoring well locations c. Plumes of soil and groundwater contamination	PM CAD Operator	2 2	Site map already prepared under earlier plans/reports. Only modifications required at this point.
E. Technical Information – Corrective Action Plan 1. Discussion of how the corrective action plan shall remediate the release 2. List of sampling parameters and corresponding remediation objectives 3. Basis for determining sampling parameters and remediation objectives 4. Media sampling plan to verify completion of remediation 5. Current and future use of the property 6. Proposed preventive, engineering and institutional controls 7. Schedule for implementation and projected completion of the plan 8. Engineering design specifications, diagrams, calculations, manufacturer's specifications, systems analyses, site maps, etc.	PM	16	
c. Prepare budget for corrective action plan	Account Tech	8	
d. Review and certification of corrective action plan and budget	LPE or LPG	4	PM/Senior staff reference deleted.

Scope of Work	Personnel	Hours	Comments
6. Resource Coordination a. Schedule project b. Arrange for subcontractors c. Call J.U.L.I.E. and/or municipality to locate utilities	PM	16	Reference to individual subcontracted activities changed to "subcontractors."
7. Distribution a. Deliver draft corrective action plan and budget <u>and application for payment</u> to owner/operator for review and signature b. Make copies of corrective action plan and budget <u>and application for payment</u> for distribution c. Deliver completed corrective action plan and budget <u>and application for payment</u> to IEPA and owner/operator	Admin Asst	2	Covers all copying and delivering costs.
8. <u>Prepare applications for payment for off-site investigation, or for on-site investigation if no off-site investigation is required.</u>	<u>Account Tech</u>	<u>8</u>	<u>This is added to IPCB's proposal.</u>
Section 732.845(d)(7)(B) Development of Tier 2 or Tier 3 remediation objectives	PM	8	
Section 732.845(d)(8) Environmental Land Use Controls and Highway Authority Agreements	PM	8	8 hours total for each ELUC & HAA. Standardized documents being proposed in separate TACO rulemaking.
Section 732.845(d)(9) Preparation and submission of corrective action completion report			These tasks apply to Corrective Action Completion Reports for both conventional and alternative technologies. IPCB's proposal referenced only conventional technologies.
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with Agency b. Correspond with and update client			2.a. already included in other line items and 2.b. is not corrective action.
3. Records Gathering a. Obtain legal description of property b. Obtain property tax identification number			Included in hours for preparation of Corrective Action Completion Report.

Scope of Work	Personnel	Hours	Comments
4. Technical Evaluation a. Address items in 35 IAC 734.345(a)? b. Prepare and describe photos c. Prepare or finalize field notes			Included in 5 below.
5. Report Preparation a. Prepare Corrective Action Completion Report following items in 35 IAC 734.345(a) 1. Provide information concerning: a. Site Identification b. Site Information c. Completion Information 1. Chronological narrative of corrective action activities 2. Explanation of how the corrective action activities remediated the release 3. Discussion of how the remediation objectives were determined 4. Media sampling and analytical procedures to verify completion of remediation 5. Analytical results and remediation objectives in tabular format 6. Laboratory results 7. Soil boring logs 8. Monitoring well logs 9. Laboratory certification 10. Applicable Professional Engineer Certification 11. Site maps to scale and oriented north showing: a. Final soil sample locations demonstrating completion of remediation b. Groundwater monitoring well locations c. Groundwater recovery/discharge points d. Plume of contamination as defined by laboratory analyses and e. Area remediated 12. Property Owner Summary 13. Photographs documenting corrective action activities	PM CAD Operator	32 8	Professional engineer certification included under 5.b. below. Site map already prepared under earlier plans/reports. Only modifications required at this point.
b. Review and certification of corrective action completion report and application for payment.	LPE	4	PM/Senior staff reference deleted. Reference to applications for payment added.
6. Resource Coordination a. Record NFR letter	Admin Asst	2	

Scope of Work	Personnel	Hours	Comments
7. Distribution a. Deliver draft corrective action completion report and application for payment to owner/operator for review and signature b. Make copies of corrective action completion report and application for payment for distribution c. Deliver completed corrective action completion report and application for payment to IEPA and owner/operator d. Make copies of recorded NFR letter for distribution e. Deliver recorded NFR letter to IEPA and owner/operator	Admin Asst	3	Covers all copying, delivering costs and recording of NFR letter. References to applications for payment added.
8. Prepare applications for payment	Account Tech	8	This is added to IPCB's original proposal.
732.845(f) Amendment of plan due to unforeseen circumstances and its associated budget	PM Account Tech	6 2	

**ATTACHMENT B TO IEPA'S POST-HEARING COMMENTS
SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS**

Scope of Work	Personnel	Hours	Comments
Section 734.845(a)(1) Preparation for the abandonment or removal of USTs			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Office of the Illinois State Fire Marshal (OSFM) 1. Prepare and submit initial Notification Form for Underground Storage Tanks 2. Prepare Application for Permit for Removal/Abandonment of Underground Storage Tanks and submit to owner/operator for signature 3. Submit Application for Permit for Removal/Abandonment to OSFM 4. Prepare and submit LUST Fund Eligibility and Deductibility Application 5. Prepare and submit amended Notification Form	Tech	1	2.a.1, 2, 3 & 5 are performed by tank removal contractor and included in tank removal lump sum.
b. Illinois Environmental Protection Agency (IEPA) 1. Prepare and submit early action extension 2. Follow up	PM	1	Not required in all cases.
c. Correspond with and update client			Not corrective action.
3. Waste Disposal a. Determine early action excavation limits	PM	1	
b. Prepare waste profile and arrange for landfill approval	Tech	2	See Section 734.845(a)(2) for field work.
c. Prepare waste manifests or tracking forms	PM	1	
4. Plan and Report Preparation a. Prepare site health and safety plan	PM	2	
5. Resource Coordination a. Arrange for subcontractors (e.g., excavator, tank removal contractor, backfill, landfill) b. Schedule project	PM	4	
c. Call J.U.L.I.E. and/or municipality to locate utilities			Task performed by tank removal contractor. Cost included in tank removal lump sum.

Scope of Work	Personnel	Hours	Comments
Section 734.845(a)(3) Preparation and submission of 20-day and 45-day reports			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with Agency b. Correspond with and update client			2.a. already included in other line items and 2.b. is not corrective action.
3. Records Gathering a. Obtain and review IEPA and/or OSFM records b. Obtain and review well records from ISGS and ISWS c. Obtain and review local information (e.g. Sanborn maps, aerial overlays)			3.a. and c included in hours for preparation of 45-day Report. 3.b. not required for preparation of 20 or 45-day Reports.
4. Waste Disposal a. Review disposal documentation	PM	1	
5. Technical Evaluation a. Prepare well location map (<25 records within 2500 feet) b. Determine expected local site geology (subsurface soil conditions)			a. not required for preparation of 20 or 45-day Reports. b. included in hours for preparation of 45-day Report.
6. Plan and Report Preparation a. Prepare 20-day Certification	PM	1	
b. Prepare or revise site health and safety plan			Previously prepared under 734.845(a)(1) task 4a. No revision necessary for preparation and submission of 20 and 45-day reports.

Scope of Work	Personnel	Hours	Comments
<p>c. Prepare 45-day Report</p> <ol style="list-style-type: none"> 1. Provide information pertaining to: <ol style="list-style-type: none"> A. Site Identification B. Release Information C. Early Action D. Site Information <ol style="list-style-type: none"> 1. Nature and estimated quantity of release 2. Data concerning: <ol style="list-style-type: none"> a. Surrounding populations b. Water quality c. Use and approximate locations of wells potentially affected by the release d. Subsurface soil conditions e. Location of subsurface sewers f. Climatological conditions g. Land use 3. A discussion of what was done to measure for the presence of a release 4. Action taken to prevent further release of the regulated substance into the environment 5. A discussion of the action taken to monitor and mitigate fire and safety hazards posed by vapors of free product that has migrated from the UST excavation zone and entered subsurface structures 	PM	8	
<p>E. Supporting Documentation</p> <ol style="list-style-type: none"> 1. Site map to scale and oriented north showing: <ol style="list-style-type: none"> a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc.) e. Nearby structures (buildings, roads, etc.) f. Soil boring(s) (if present) g. Monitoring well(s) and/or sumps (if present) h. Property boundaries i. Sample location points 2. Area map showing the site in relation to surrounding properties. This map should identify the facilities on the surrounding properties 3. Cross-section, to scale, showing the USTs and the excavation 	CAD Operator	8	
<ol style="list-style-type: none"> 4. Analytical/screening results in tabular format, including the results of soil samples required pursuant to 35 Ill. Adm. Code 734.202(h) or 45 ILCS 5/57-57.17. 	PM	2	

Scope of Work	Personnel	Hours	Comments
5. UST information in a tabular format, including: a. Total number of UST(s) on site b. Volume of the UST(s) (in gallons) c. The material stored in the UST(s) d. Identification of UST system(s) that had a release e. Identification of UST system(s) that were repaired, removed, or abandoned in-place			UST information table included on Agency forms under 6.c.1.B. above (Release Information)
6. Copy of OSFM Permits or notifications	Admin Asst	1	6, 8 & 9 combined for a total of 1 hour.
7. Narrative of tank removal and cleaning operations; describe how wastes generated during the tank removal were managed, treated, and disposed of	PM	1	
8. Photographs of UST removal activities and the excavation 9. Copies of waste manifests for soil and groundwater transported off-site			6, 8 & 9 combined for a total of 1 hour.
d. Review and certification of 20-Day and 45-Day Reports and application for payment.	LPE or LPG	1	Certification added to IPCB's proposal. PM/Senior staff reference deleted. Added references to application for payment.
7. Resource Coordination a. Call J.U.L.I.E. and/or municipality to locate utilities			Already done prior to tank removal. Not required for preparation and submission of 20 and 45-day reports.
8. Distribution a. Deliver draft 20-day Certification and 45-Day Report and application for payment to owner/operator for review and signature b. Make copies of 20-Day Certification and 45-Day Report and application for payment for distribution c. Deliver completed 20-Day Certification and 45-Day Report and application for payment to IEPA and owner/operator	Admin Asst	2	Covers all copying and delivering costs. Added references to application for payment.
9. Prepare application for payment	Account Tech	8	This is added to IPCB's proposal.
Section 734.845(a)(6) Preparation and submission of free product removal reports			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with and update Illinois Environmental Protection Agency (IEPA) b. Correspond with and update Client			2.a. already included in other line items and 2.b. is not corrective action.

Scope of Work	Personnel	Hours	Comments
3. Waste Disposal a. Review disposal documentation	PM	1	
4. Free Product Report Preparation a. Prepare Free Product Removal Report 1. Provide information pertaining to: A. Site Identification B. Free Product Information 1. Name(s) of person(s) responsible for implementing the free product removal measures 2. Estimated quantity, type, and thickness of free product observed or measured in boreholes, wells, excavation, etc. 3. The type of free product recovery system used and technical justification for the method of recovery chosen 4. Whether any discharge will take place on- or off-site during the recovery operation and where this discharge (point) will be located 5. Type of treatment applied to (the free product), and the effluent quality expected from any discharge 6. Steps that have been taken or that are being taken to obtain necessary permits for any discharge 7. The disposition of the recovered free product.	PM	4	
C. Supporting Documentation 1. Site map to scale and oriented north showing: a. UST system(s) and excavation limits; b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc.) e. Nearby structures (buildings, roads, etc.) f. Soil boring(s) (if present) g. Monitoring well(s) and/or sumps (if present) h. Locations where free product was encountered including its estimated thickness i. Location of recovery points j. Location of the treatment unit k. Location of discharge points l. Property boundaries	CAD Operator	1	Site map already prepared under Early Action. Only modifications required at this point.
2. Table showing the dates that free product recovery was conducted and the amount of free product recovered on each date	PM	1	
3. Copies of waste manifests	Admin Asst	1	
5. Review and certification of free product removal report.	LPE or LPG	1	Added to IPCB's proposal.

Scope of Work

Scope of Work	Personnel	Hours	Comments
6. Distribution <ul style="list-style-type: none"> a. Deliver draft free product removal report to owner/operator for review and signature b. Make copies of free product removal report for distribution c. Deliver completed report to IEPA and owner/operator 	Admin Asst	2	Covers all copying and delivering costs.
Section 734.845(a)(7) Preparation and submission of reports submitted pursuant to Section 734.210(h)(3)			
1. Site characterization/narrative 2. Characterization/narrative of water encountered in UST excavation 3. Completion of Property Owner Summary Form 4. Recording NFR Letter Early Action Completion Report	PM Admin Asst	2 2	This report submitted as part of 45-day Report. All other costs related to this report are included in costs for 45-day Report (e.g., LPG/LPE certification, distribution).
Section 734.845(b)(1) Preparation and submission of stage 1 site investigation plan			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence <ul style="list-style-type: none"> a. Correspond with Agency b. Correspond with and update client 			2.a. already included in other line items and 2.b. is not corrective action.
3. Technical Evaluation <ul style="list-style-type: none"> a. Determine expected local site geology (subsurface soil conditions) b. Evaluate backfill/piping samples to Tier 1 remediation objectives c. Determine drilling locations for soil samples and monitoring wells d. Demonstrate if groundwater investigation is required (if applicable) e. Conduct initial water supply well survey per 734.315(a)(3) 	PM	8	
4. Plan Preparation <ul style="list-style-type: none"> a. Prepare Stage 1 Site Investigation Plan <ul style="list-style-type: none"> 1. Provide information concerning: <ul style="list-style-type: none"> A. Site Identification B. Site Information <ul style="list-style-type: none"> 1. Will owner/operator seek reimbursement from the UST Fund? 2. If yes, is budget attached? 3. Is this an amended plan? 4. Identify the material released 5. Describe the activities that will be performed to determine the following: <ul style="list-style-type: none"> a. Degree of soil contamination b. Extent of soil contamination (as defined to Tier 1 Residential remediation objectives) c. The degree of groundwater contamination 			Stage 1 Plan consists of a certification in the 45-day Report that the Stage 1 investigation will be conducted in accordance with 35 IAC 734.315 (Stage 1 site investigation requirements), therefore time for preparation and submission of the Stage 1 Plan is included under Section 734.845(a)(3) (preparation and submission of 20-day and 45-day reports).

Scope of Work	Personnel	Hours	Comments
<ul style="list-style-type: none"> d. Extent of groundwater contamination (as defined to Class 1 Remediation Objectives unless otherwise approved by the Illinois EPA) e. Direction of groundwater flow f. Hydraulic conductivity of groundwater g. Identification of Site features that may affect contaminant transport and risk to human health and the environment 6. Site map to scale and oriented north showing: <ul style="list-style-type: none"> a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc) e. Nearby structures (buildings, roads, etc.) f. Location of the proposed/existing soil borings g. Location of the proposed/existing monitoring wells h. Property boundaries 			
<ul style="list-style-type: none"> b. Prepare or update site health and safety plan 			<p>Previously prepared under 734.845(a)(1) task 4a. Not required for preparation and submission of Stage 1 plan.</p>
<ul style="list-style-type: none"> c. Prepare budget 			<p>No preparation of budget is required. Stage 1 Budget consists of a certification in the 45-day Report that the Stage 1 investigation costs will not exceed the cost set forth in Subpart H.</p>
<ul style="list-style-type: none"> d. Review work to be done by project manager or other senior staff e. Prepare LPE/LPG certification 			<p>Stage 1 plan submitted as part of 45-day Report. Review and certification costs included under 45-day Report review and certification costs.</p>
<ul style="list-style-type: none"> 5. Resource Coordination <ul style="list-style-type: none"> a. Arrange for drilling b. Call J.U.L.I.E. and/or municipality to locate utilities 	PM	2	
<ul style="list-style-type: none"> 6. Distribution <ul style="list-style-type: none"> a. Deliver draft plan and budget to owner/operator for review and signature b. Make copies of plan and budget for distribution c. Deliver completed plan and budget to Agency and owner/operator 			<p>Stage 1 Plan submitted as part of 45-day Report. These costs included under 45-day Report costs.</p>

Scope of Work	Personnel	Hours	Comments
Section 734.845(b)(3) Preparation and submission of stage 2 site investigation plan			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with Agency b. Correspond with and update client			2.a. already included in other line items and 2.b. is not corrective action.
3. Records Gathering a. Obtain local information (e.g., Sanborn maps, aerial overlays, etc.) b. Determine extent of property boundaries			These tasks already performed as part of 45-day Report preparation.
4. Technical Evaluation a. Address items in 35 IAC 734.320(b) b. Prepare or finalize field notes c. Prepare and describe site investigation photos	PM CAD Operator	16 8	These hours cover technical work performed (vs. report preparation hours which are included under 5 below).
d. Prepare contingency scope of work for boring/monitoring well locations			Included under 5 below.
5. Plan Preparation a. Prepare Stage 2 Site Investigation Plan addressing items in 35 IAC 734.320(b) 1. Provide information concerning: A. Site Identification B. Site Information 1. Will owner/operator seek reimbursement from the UST Fund? 2. If yes, is budget attached? 3. Is this an amended plan? 4. Identify the material released 5. Describe the activities that will be performed to determine the following: a. Degree of soil contamination b. Extent of soil contamination (as defined to Tier 1 Residential remediation objectives) c. The degree of groundwater contamination d. Extent of groundwater contamination (as defined to Class 1 Remediation Objectives unless otherwise approved by the Illinois EPA) e. Direction of groundwater flow f. Hydraulic conductivity of groundwater g. Identification of Site features that may affect contaminant transport and risk to human health and the environment. h. The following parameters, if determined during Stage 2 investigation: Hydraulic conductivity Soil bulk density Soil particle density	PM	8	5.a.1.B.5.h and 5.a.1.C added to Board's proposal. Maps included under 4.a. above. Site map already prepared under earlier plans/reports. Only modifications required at this point.

Scope of Work	Personnel	Hours	Comments
Moisture content Organic carbon content 6. Site map to scale and oriented north showing: a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc) e. Nearby structures (buildings, roads, etc.) f. Location of the proposed/existing soil borings g. Location of the proposed/existing monitoring wells h. Property boundaries C. Site Investigation Summary Form			
b. Prepare budget	Account Tech	4	
c. Prepare or review site health and safety plan			Previously prepared under 734.845(a)(1) task 4a.
d. Review and certification of Stage 2 Site Investigation Plan, Budget, and Stage 1 application for payment.	LPE/LPG	2	PM/Senior staff reference deleted. Added reference to application for payment.
6. Resource Coordination a. Arrange for drilling b. Call J.U.L.I.E. and/or municipality to locate utilities	PM	2	
7. Distribution a. Deliver draft plan and budget and application for payment to owner/operator for review and signature b. Make copies of plan and budget and application for payment for distribution c. Deliver completed plan and budget and application for payment to IEPA and owner/operator	Admin Asst	2	Covers all copying and delivering costs. Added references to application for payment.
8. Prepare Stage 1 applications for payment	Account Tech	8	This is added to IPCB's proposal.
734.845(b)(5) Preparation and submission of stage 3 site investigation plan			
1. Records Gathering a. Obtain local information (e.g., Sanborn maps, aerial overlays, etc.) b. Determine extent of property boundaries			The following hours are proposed in lieu of time and materials for Stage 3 Site Investigation. These tasks are already performed as part of 45-day Report preparation.
2. Technical Evaluation a. Address items in 35 IAC 734.325(b) b. Prepare or finalize field notes c. Prepare and describe site investigation photos	PM CAD Operator	16 8	These hours cover technical work performed (vs. report preparation hours which are included under 3 below).

Scope of Work

Scope of Work	Personnel	Hours	Comments
d. Prepare contingency scope of work for boring/monitoring well locations.			Included under 3 below.
<p>3. Plan Preparation</p> <p>a. Prepare Stage 3 Site Investigation Plan addressing items in 35 IAC 734.325(b)</p> <p>1. Provide information concerning:</p> <p>A. Site Identification</p> <p>B. Site Information</p> <ol style="list-style-type: none"> 1. Will owner/operator seek reimbursement from the UST Fund? 2. If yes, is budget attached? 3. Is this an amended plan? 4. Identify the material released 5. Describe the activities that will be performed to determine the following: <ol style="list-style-type: none"> a. Degree of soil contamination b. Extent of soil contamination (as defined to Tier 1 Residential remediation objectives) c. The degree of groundwater contamination d. Extent of groundwater contamination (as defined to Class 1 Remediation Objectives unless otherwise approved by the Illinois EPA) e. Direction of groundwater flow f. Hydraulic conductivity of groundwater g. Identification of Site features that may affect contaminant transport and risk to human health and the environment. h. The following parameters, if determined during Stage 3 investigation: <ul style="list-style-type: none"> Hydraulic conductivity Soil bulk density Soil particle density Moisture content Organic carbon content 6. Site map to scale and oriented north showing: <ol style="list-style-type: none"> a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc) e. Nearby structures (buildings, roads, etc.) f. Location of the proposed/existing soil borings g. Location of the proposed/existing monitoring wells h. Property boundaries <p>C. Site Investigation Summary Form</p>	PM	8	Maps included under 2.a. above. Site map already prepared under earlier plans/reports. Only modifications required at this point
b. Prepare budget	Account Tech	4	
c. Review and certification of Stage 3 Site Investigation Plan and Budget and Stage 2 application for payment.	LPE/LPG	2	

Scope of Work	Personnel	Hours	Comments
4. Resource Coordination a. Arrange for drilling b. Call J.U.L.I.E. and/or municipality to locate utilities	PM	2	
5. Distribution a. Deliver draft plan and budget and application for payment to owner/operator for review and signature b. Make copies of plan and budget and application for payment for distribution c. Deliver completed plan and budget and application for payment to IEPA and owner/operator	Admin Asst	2	Covers all copying and delivering costs.
6. Prepare Stage 2 applications for payment	Account Tech	8	
Section 734.845(b)(7) Off-site property access Correspondence and meetings with off-site property owners	PM	4 for each off-site property	4 hours total for each off-site property to which off-site access is sought. This work moved here from the scope of work for 734.845(b)(5) above.
Section 734.845(b)(8) Well surveys conducted pursuant to Section 734.445(b)	PM	4	Not required for all sites.
Section 734.845(b)(9) Preparation and submission of site investigation completion report			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with Agency b. Correspond with and update client			2.a. already included in other line items and 2.b. is not corrective action.
3. Records Gathering a. Obtain local information (e.g., Sanborn maps, aerial overlays, etc.) b. Determine extent of property boundaries			These tasks are already performed as part of 45-day Report preparation.
4. Technical evaluation a. Address items in 35 IAC 734.330(a)(b) and (c) c. Describe methods for investigating site and surrounding areas. d. Describe the observations made while investigating site and surrounding areas e. Prepare or revise site maps per 35 IAC 734.330(b)(2)-(4) that also show: 1. Distance of at least 1,000 feet around UST (scale > 1:200) 2. Location of site with respect to section, township and range 3. On-site and off-site injection and withdrawal wells affected by release f. Evaluate existing and potential migration pathways and exposure routes	PM	16	

Scope of Work

Scope of Work	Personnel	Hours	Comments
<ul style="list-style-type: none"> g. Compile information regarding site-specific sampling activities and methods, including: <ul style="list-style-type: none"> 1. Sample collection information (date, time, method, location, sampler) 2. Sample preservation and shipment information, including QA/QC 3. Field and lab blank documentation h. Interpret the results of the site investigation i. Describe the release and evaluation exposure routes j. Describe the nature, concentration and extent of indicator contaminants k. Prepare or finalize field notes l. Prepare and describe site investigation photos m. Provide analysis of hydraulic conductivity test data from a single well n. Provide description of physical features that may affect contaminant transport 			
<p>5. Report Preparation</p> <ul style="list-style-type: none"> a. Prepare Site Investigation Completion Report addressing items in 35 IAC 734.330(a)(b) and (c) <ul style="list-style-type: none"> 1. Provide information concerning: <ul style="list-style-type: none"> A. Site Identification B. Site Information C. Site Investigation Results <ul style="list-style-type: none"> 1. Site History/Executive Summary 2. Narrative of field activities including sampling methods 3. Discussion of development of remediation objectives 4. Analytical results and remediation objectives in tabular format 5. Conclusions 6. Site maps to scale <ul style="list-style-type: none"> a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc) e. Nearby structures (buildings, roads, etc.) f. Location of the soil borings g. Location of the existing monitoring wells h. Property boundaries 7. Soil boring logs 8. Well completion reports 9. Laboratory Reports and 10. Laboratory Certification D. Site Investigation Summary Form 	PM CAD Operator	4 4	Site map already prepared under earlier plans/reports. Only modifications required at this point. Site Investigation Summary Form added to IPCB's proposal.
<ul style="list-style-type: none"> b. Prepare appendices containing references and data sources, log, lab reports, etc. 			Included in 4 and 5.a above.

Scope of Work	Personnel	Hours	Comments
c. Review and certification of site investigation completion report and Stage 3 application for payment.	LPE or LPG	2	PM/Senior staff reference deleted. Reference to application for payment added.
6. Distribution a. Deliver draft site investigation completion report and application for payment to owner/operator for review and signature b. Make copies of site investigation completion report and application for payment for distribution c. Deliver completed report and application for payment to IEPA and owner/operator	Admin Asst	2	Covers all copying and delivering costs. Reference to application for payment added.
7. Prepare Stage 3 applications for payment <u>for last stage of site investigation</u>	Account Tech	8	This is added to IPCB's proposal.
Section 734.845(c)(1) Preparation and submission of corrective action plan (Conventional Tech)			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with Agency b. Correspond with and update client			2.a. already included in other line items and 2.b. is not corrective action.
3. Waste Disposal a. Prepare waste profile (arrange for landfill approval)	Tech	4	These hours include field work that is not covered under the half-day rates.
b. Determine limits of excavation c. Estimate quantity of contaminated soil to be disposed of d. Mail waste profile to owner/operator for review and signature e. Prepare waste manifests or tracking forms.	PM	4	
4. Technical Evaluation a. Estimate quantity of "clean" overburden to be stockpiled (if any).			Included in 3.b above
b. Prepare or finalize field notes c. Prepare and describe remediation photos			This work part of preparation and submission of Corrective Action Completion Report. (see items 4.b and c. under scope of work for Section 734.845(c)(4)).
5. Plan Preparation a. Prepare or review site health and safety plan			Previously prepared under 734.845(a)(1), item 4a.

Scope of Work

	Personnel	Hours	Comments
<p>b. Prepare Corrective Action Plan</p> <p>1. Provide information concerning:</p> <p>A. Site Identification</p> <p>B. Site Information</p> <p>C. Proposed Methods of Remediation</p> <p>D. Soil and Groundwater Investigation Results</p> <p>1. Description of investigation activities performed to define the extent of soil and/or groundwater contamination</p> <p>2. Analytical results and cleanup objectives in tabular format</p> <p>3. Laboratory results</p> <p>4. Boring logs</p> <p>5. Monitoring well logs; and</p> <p>6. Site maps to scale and oriented north showing:</p> <p>a. Soil sample locations</p> <p>b. Monitoring well locations</p> <p>c. Plumes of soil and groundwater contamination</p>	<p>PM</p> <p>CAD Operator</p>	<p>2</p> <p>2</p>	<p>Site map already prepared under earlier plans/reports. Only modifications required at this point.</p>
<p>E. Technical Information – Corrective Action Plan</p> <p>1. Discussion of how the corrective action plan shall remediate the release</p> <p>2. List of sampling parameters and corresponding remediation objectives</p> <p>3. Basis for determining sampling parameters and remediation objectives</p> <p>4. Media sampling plan to verify completion of remediation</p> <p>5. Current and future use of the property</p> <p>6. Proposed preventive, engineering and institutional controls</p> <p>7. Schedule for implementation and projected completion of the plan</p> <p>8. Engineering design specifications, diagrams, calculations, manufacturer’s specifications, systems analyses, site maps, etc.</p>	<p>PM</p>	<p>16</p>	
<p>c. Prepare budget for corrective action plan</p>	<p>Account Tech</p>	<p>8</p>	
<p>d. Review and certification of corrective action plan and budget</p>	<p>LPE or LPG</p>	<p>4</p>	<p>PM/Senior staff reference deleted.</p>
<p>6. Resource Coordination</p> <p>a. Schedule project</p> <p>b. Arrange for subcontractors</p> <p>c. Call J.U.L.I.E. and/or municipality to locate utilities</p>	<p>PM</p>	<p>16</p>	<p>Reference to individual subcontracted activities changed to “subcontractors.”</p>
<p>7. Distribution</p> <p>a. Deliver draft corrective action plan and budget to owner/operator for review and signature.</p> <p>b. Make copies of corrective action plan and budget for distribution.</p> <p>c. Deliver completed corrective action plan and budget to IEPA and owner/operator.</p>	<p>Admin Asst</p>	<p>2</p>	<p>Covers all copying and delivering costs.</p>

Scope of Work	Personnel	Hours	Comments
Section 734.845(c)(3) Environmental Land Use Controls and Highway Authority Agreements	PM	8	8 hours total for each ELUC & HAA. Standardized documents being proposed in separate TACO rulemaking.
Section 734.845(c)(4) Preparation and submission of corrective action completion report			These tasks apply to Corrective Action Completion Reports for both conventional and alternative technologies. IPCB's proposal referenced only conventional technologies.
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with Agency b. Correspond with and update client			2.a. already included in other line items and 2.b. is not corrective action.
3. Records Gathering a. Obtain legal description of property b. Obtain property tax identification number			Included in hours for preparation of Corrective Action Completion Report.
4. Technical Evaluation a. Address items in 35 IAC 734.345(a)? b. Prepare and describe photos c. Prepare or finalize field notes			Included in 5 below.
5. Report Preparation a. Prepare Corrective Action Completion Report following items in 35 IAC 734.345(a) 1. Provide information concerning: a. Site Identification b. Site Information c. Completion Information 1. Chronological narrative of corrective action activities 2. Explanation of how the corrective action activities remediated the release 3. Discussion of how the remediation objectives were determined 4. Media sampling and analytical procedures to verify completion of remediation 5. Analytical results and remediation objectives in tabular format 6. Laboratory results 7. Soil boring logs 8. Monitoring well logs 9. Laboratory certification 10. Applicable Professional Engineer Certification	PM CAD Operator	32 8	Professional engineer certification included under 5.b. below. Site map already prepared under earlier plans/reports. Only modifications required at this point.

Scope of Work	Personnel	Hours	Comments
11. Site maps to scale and oriented north showing: <ul style="list-style-type: none"> a. Final soil sample locations demonstrating completion of remediation b. Groundwater monitoring well locations c. Groundwater recovery/discharge points d. Plume of contamination as defined by laboratory analyses e. Area remediated 12. Property Owner Summary 13. Photographs documenting corrective action activities			
b. Review and certification of corrective action completion report and application for payment.	LPE	4	PM/Senior staff reference deleted. Reference to applications for payment added.
6. Resource Coordination <ul style="list-style-type: none"> a. Record NFR letter 	Admin Asst	2	
7. Distribution <ul style="list-style-type: none"> a. Deliver draft corrective action completion report and application for payment to owner/operator for review and signature b. Make copies of corrective action completion report and application for payment for distribution c. Deliver completed corrective action completion report and application for payment to IEPA and owner/operator d. Make copies of recorded NFR letter for distribution e. Deliver recorded NFR letter to IEPA and owner/operator 	Admin Asst	3	Covers all copying, delivering costs and recording of NFR letter. References to applications for payment added.
8. Prepare applications for payment	Account Tech	8	This has been added to the IPCB's proposal.
Section 734.845(d)(2) Development of Tier 2 or Tier 3 remediation objectives	PM	8	
Section 734.845(f) Amendment of plan due to unforeseen circumstances and its associated budget	PM Acct Tech	6 2	

**ATTACHMENT C TO IEPA'S POST-HEARING COMMENTS
SUMMARY OF PROFESSIONAL CONSULTING SERVICES LUMP SUMS FOR PART 732***

Section/Title	Personnel/Hours	Total from Task Breakdown (Spreadsheet)		Amount Proposed in Subpart H
		High	Low	
732.845(a)(1) Preparation for the abandonment or removal of USTs	Tech/3 PM/9	\$1095 ^{1,3}	\$945 ^{1,3}	\$960 ¹
732.845(a)(3) Preparation and submission of 20-day and 45-day reports	PM/13 CAD/8 Acct Tech/8 Admin Asst/3 LPE/LPG/1	\$2485 ^{1,2,3}	\$1937 ^{1,2,3}	\$4800 ^{1,2}
732.845(a)(7) Preparation and submission of free product removal reports	PM/6 CAD/1 Admin Asst/3 LPE/LPG/1	\$925	\$747	\$1600
732.845(a)(8) Preparation and submission of reports submitted pursuant to Section 732.202(h)(3)	PM/2 Admin Asst/2	\$290	\$230	\$500
732.845(b)(1) Preparation and submission of site classification plans, site classification preparation, fieldwork, field oversight, and the preparation and submission of the site classification completion report	PM/40 Geologist/10 CAD/13 Tech/20 LPE/LPG/4 Admin Asst/4 Acct Tech/12	\$8540 ²	\$6608 ²	\$9870 ²
732.845(c)(1) Preparation and submission of low priority groundwater monitoring plan	PM/8 Acct Tech/4 LPE/LPG/2 Admin Asst/2	\$1370	\$1094	\$3200
732.845(c)(3) Preparation and submission of first year groundwater monitoring reports	PM/8 CAD/2 LPE/LPG/2 Admin Asst/2 Account Tech/4	\$1490	\$1174	\$2560
732.845(c)(4) Preparation and submission of second year groundwater monitoring reports	PM/8 CAD/2 LPE/LPG/2 Admin Asst/2 Account Tech/4	\$1490	\$1174	\$2560
732.845(c)(5) Preparation and submission of low priority groundwater monitoring completion report	PM/8 CAD/2 LPE/LPG/2 Admin Asst/2 Account Tech/4	\$1490	\$1174	\$2560
732.845(d)(1)(A) Preparation and submission of investigation plans for on-site contamination for sites classified pursuant to Section 732.307	PM/26 CAD/8 Account Tech/4 LPE/LPG/2 Admin Asst/2	\$3650	\$3034	\$3200

Section/Title	Personnel/Hours	Total from Task Breakdown (Spreadsheet)		Amount Proposed in Subpart H
		High	Low	
732.845(d)(1)(B) Preparation and submission of investigation plans for off-site contamination for sites classified pursuant to Section 732.307	PM/26 CAD/8 Account Tech/12 LPE/LPG/2 Admin Asst/2	\$4090	\$3314	\$3200
732.845(d)(3) Off-site property access	PM/4 per off-site property	\$400 per off-site property	\$360 per off-site property	
732.845(d)(4) Well surveys conducted pursuant to Sections 732.404(e)(1) and 734.445(b)	PM/4	\$400	\$360	\$160
732.845(d)(5) Preparation and submission of corrective action plan (Conventional)	PM/38 Tech/4 CAD/2 Account Tech/16 LPE/LPG/4 Admin Asst/2	\$5670	\$4658	\$5120
732.845(d)(7)(B) Development of Tier 2 or Tier 3 remediation objectives	PM/8	\$800	\$720	\$800
732.845(d)(8) Environmental Land Use Controls and Highway Authority Agreements	PM/8	\$800	\$720	\$800
732.845(d)(9) Preparation and submission of corrective action completion report	PM/32 CAD/8 LPE/4 Admin Asst/5 Account Tech/8	\$4865	\$4045	\$5120
732.845(f) Amendment of plan and its associated budget	PM/6 Account Tech/2	\$710	\$610	\$640

	<u>High</u>	<u>Low</u>		<u>High</u>	<u>Low</u>
LPE/LPG	\$130	\$92	CAD	\$60	\$40
PM	\$100	\$90	Admin Asst	\$45	\$25
Tech	\$65	\$45	Acct Tech	\$55	\$35
Geologist	\$110	\$70			

¹ In the IEPA's proposal preparation of Health and Safety Plan costs were included in the preparation of the 20 Day and 45 Day Report cost. In this breakdown, preparation of Health and Safety Plan costs are included in preparation for the abandonment or removal of USTs.

² In the IEPA's proposal potable water supply well survey costs were included in the preparation of the 20 Day and 45 Day Report costs. In this breakdown, potable water supply well survey costs are included in Site Classification costs.

³ Early action field work previously included in these lump sums have been moved to field work and field oversight unit rates. See proposed additions to Section 732.845(a)(2).

***Note: This summary includes only lump sum amounts for Professional Consulting Services. It does not include professional consulting services costs reimbursed on a unit rate or time and materials basis.**

**ATTACHMENT D TO IEPA'S POST-HEARING COMMENTS
SUMMARY OF PROFESSIONAL CONSULTING SERVICES LUMP SUMS FOR PART 734***

Section/Title	Personnel/Hours	Total from Task Breakdown (Spreadsheet)		Amount Proposed in Subpart H
		High	Low	
734.845(a)(1) Preparation for the abandonment or removal of USTs	Tech/3 PM/9	\$1095 ^{1,3}	\$945 ^{1,3}	\$960 ¹
734.845(a)(3) Preparation and submission of 20-day and 45-day reports	PM/13 CAD/8 Acct Tech/8 Admin Asst/3 LPE/LPG/1	\$2485 ^{1,2,3}	\$1937 ^{1,2,3}	\$4800 ^{1,2}
734.845(a)(7) Preparation and submission of free product removal reports	PM/6 CAD/1 LPE/LPG/1 Admin Asst/3	\$925	\$747	\$1600
734.845(a)(8) Preparation and submission of reports submitted pursuant to Section 734.210(h)(3)	PM/2 Admin Asst/2	\$290	\$230	\$500
734.845(b)(1) Preparation and submission of stage 1 site investigation plan	PM/10	\$1000	\$900	\$1600
734.845(b)(3) Preparation and submission of stage 2 site investigation plan	PM/26 CAD/8 Acct Tech/12 Admin Asst/2 LPE/LPG/2	\$4090 ²	\$3314 ²	\$3200 ²
734.845(b)(5) Preparation and submission of stage 3 site investigation plan	PM/26 CAD/8 Acct Tech/12 LPE/LPG/2 Admin Asst/2	\$4090	\$3314	\$3200- Agency T&M - Board
734.845(b)(7) Off-site property access	PM/4 per off-site property	\$400 per off-site property	\$360 per off-site property	
734.845(b)(8) Well surveys conducted pursuant to Section 734.445(b)	PM/4	\$400	\$360	\$160
734.845(b)(9) Preparation and submission of site investigation completion report	PM/20 CAD/4 LPE/LPG/2 Admin Asst/2 Acct Tech/8	\$3030	\$2474	\$1600
734.845(c)(1) Preparation and submission of corrective action plan (Conventional)	PM/38 Tech/4 CAD/2 Acct Tech/8 LPE/LPG/4 Admin Asst/2	\$5230	\$4378	\$5120

Section/Title	Personnel/Hours	Total from Task Breakdown (Spreadsheet)		Amount Proposed in Subpart H
		High	Low	
734.845(c)(3) Environmental Land Use Controls and Highway Authority Agreements	PM/8	\$800	\$720	\$800
734.845(c)(4) Preparation and submission of corrective action completion report	PM/32 CAD/8 LPE/LPG/4 Admin Asst/5 Acct Tech/8	\$4865	\$4045	\$5120
734.845(d)(2) Development of Tier 2 or Tier 3 remediation objectives	PM/8	\$800	\$720	\$800
734.845(f) Amendment of plan and its associated budget	PM/6 Acct Tech/2	\$710	\$610	\$640

	<u>High</u>	<u>Low</u>		<u>High</u>	<u>Low</u>
LPE/LPG	\$130	\$92	CAD	\$60	\$40
PM	\$100	\$90	Admin Asst	\$45	\$25
Tech	\$65	\$45	Acct Tech	\$55	\$35
Geologist	\$110	\$70			

¹ In the IEPA's proposal preparation of Health and Safety Plan costs were included in the preparation of the 20 Day and 45 Day Report cost. In this breakdown, preparation of Health and Safety Plan costs are included in preparation for the abandonment or removal of USTs.

² In the IEPA's proposal potable water well survey costs were included in the preparation of the 20 Day and 45 Day Report costs. In this breakdown, potable water well survey costs are included in Stage 2 Site Investigation Plan costs.

³ Early action field work previously included in these lump sums have been moved to field work and field oversight unit rates. See proposed additions to Section 734.845(a)(2).

***Note: This summary includes only lump sum amounts for Professional Consulting Services. It does not include professional consulting services costs reimbursed on a unit rate or time and materials basis.**

ATTACHMENT E TO IEPA'S POST-HEARING COMMENTS
PROPOSED SECTION 732.845

Section 732.845 Professional Consulting Services

Payment for costs associated with professional consulting services must not exceed the amounts set forth in this Section. Such costs must include, but not be limited to, those associated with project planning and oversight; field work; field oversight; travel; per diem; mileage; transportation; vehicle charges; lodging; meals; and the preparation, review, certification, and submission of all plans, budget plans, reports, applications for payment, and other documentation. The maximum payment amounts set forth in this Section are not subject to the provisions of Section 732.855 of this Part.

- a) Early Action and Free Product Removal. Payment of costs for professional consulting services associated with early action and free product removal activities conducted pursuant to Subpart B of this Part must not exceed the following amounts:
- 1) Payment for costs associated with preparation for the abandonment or removal of USTs, including the tasks listed in Appendix F of this Part, must not exceed a total of \$1,095.00~~\$960.00~~.
 - 2) Payment for costs associated with early action field work and field oversight must not exceed a total of \$390.00 per half-day, plus travel costs in accordance with subsection (e) of this Section. The number of half-days must not exceed the following:
 - A) One half-day for field work and field oversight required to comply with Section 732.202(a) of this Part other than the mitigation of fire, explosion, or vapor hazards pursuant to Section 732.202(a)(3). Activities associated with the mitigation of fire, explosion, or vapor hazards pursuant to Section 732.202(a)(3) are subject to subsection (a)(4) of this Section instead of this subsection (a)(2)(A).
 - B) One half-day for field work and field oversight required to comply with Section 732.202(b) of this Part other than continued monitoring and mitigation of fire, explosion, or vapor hazards pursuant to Section 732.202(b)(3). Activities associated with continued monitoring and mitigation of fire, explosion, or vapor hazards pursuant to Section 732.202(b)(3) are subject to subsection (a)(4) of this Section instead of this subsection (a)(2)(B).
 - C) A) If one or more USTs are removed, one half-day for each leaking UST that is removed, not to exceed a total of ten half-days, plus one half-day for each 225 cubic yards, or fraction thereof, of visibly contaminated fill material removed and disposed of in accordance with Section 732.202(f) of this Part;

- ~~D)B)~~ If one or more USTs remain in place, one half-day for every four soil borings, or fraction thereof, drilled pursuant to Section 732.202(h)(2) of this Part; and
- ~~E)C)~~ One half-day if a UST line release is repaired; and
- F) One half-day for field work and field oversight required for the preparation and submission of the 45-day report other than the field work and field oversight required under Section 732.202(a) and (b) of this Section.
- ~~3)~~ Payment for costs associated with the preparation and submission of 20-day and 45-day reports, including the tasks listed in Appendix F of this Part and field work not covered by subsection (a)(2) of this Section, must not exceed a total of \$2,485.00\$4,800.00.
- ~~4)~~ Payment for costs associated with the monitoring and mitigation of fire, explosion, or vapor hazards required under Sections 732.202(a)(3) and (b)(3) of this Part must be determined on a time and materials basis and must not exceed the amounts set forth in Section 732.850 of this Part.
- ~~5)4)~~ Payment for costs associated with the preparation and submission of free product removal plans and the installation of free product removal systems must be determined on a time and materials basis and must not exceed the amounts set forth in Section 732.850 of this Part.
- ~~6)5)~~ Payment for costs associated with the field work and field oversight for free product removal must not exceed a total of \$390.00 per half-day, plus travel costs in accordance with subsection (e) of this Section. The Agency must determine the reasonable number of half-days on a site-specific basis.
- ~~7)6)~~ Payment for costs associated with the preparation and submission of free product removal reports, including the tasks listed in Appendix F of this Part, must not exceed a total of \$925.00\$1,600.00 per report.
- ~~8)7)~~ Payment for costs associated with the preparation and submission of reports submitted pursuant to Section 732.202(h)(3) of this Part must not exceed a total of \$290.00\$500.00.

- b) Site Evaluation and Classification. Payment of costs for professional consulting services associated with site evaluation and classification activities conducted pursuant to Subpart C of this Part must not exceed the following amounts:
- 1) For site evaluation and classifications conducted pursuant to Section 732.307 of this Part, payment for costs associated with the preparation and submission of site classification plans, site classification preparation, field work, field oversight, and the preparation and submission of the site classification completion report, including the tasks listed in Appendix F of this Part, must not exceed a total of \$8,540.00~~\$9,870.00~~.
 - 2) For site evaluation and classifications conducted pursuant to Section 732.312 of this Part, payment for costs must be determined on a time and materials basis and must not exceed the amounts set forth in Section 732.850 of this Part. For owners and operators that elect to proceed in accordance with 35 Ill. Adm. Code 734, costs incurred after the notification of election shall be payable from the Fund in accordance with that Part.
- c) Low Priority Corrective Action. Payment of costs for professional consulting services associated with low priority corrective action activities conducted pursuant to Subpart D of this Part must not exceed the following amounts:
- 1) Payment for costs associated with the preparation and submission of low priority groundwater monitoring plans, including the tasks listed in Appendix F of this Part, must not exceed a total of \$1,370.00~~\$2,200.00~~.
 - 2) Payment for costs associated with low priority groundwater monitoring field work and field oversight must not exceed a total of \$390.00 per half-day, up to a maximum of seven half-days, plus travel costs in accordance with subsection (e) of this Section.
 - 3) Payment for costs associated with the preparation and submission of the first year groundwater monitoring report, including the tasks listed in Appendix F of this Part, must not exceed a total of \$1,490.00~~\$2,560.00~~.
 - 4) Payment for costs associated with the preparation and submission of the second year groundwater monitoring report, including the tasks listed in Appendix F of this Part, must not exceed a total of \$1,490.00~~\$2,560.00~~.
 - 5) Payment for costs associated with the preparation and submission of low priority groundwater monitoring completion report, including the tasks listed in Appendix F of this Part, must not exceed a total of \$1,490.00~~\$2,560.00~~.

- d) High Priority Corrective Action. Payment of costs for professional consulting services associated with high priority corrective action activities conducted pursuant to Subpart D of this Part must not exceed the following amounts:
- 1) Payment for costs associated with the preparation and submission of investigation plans for sites classified pursuant to Section 732.307 of this Part, including the tasks listed in Appendix F of this Part, must not exceed the following:
 - A) A total of \$3,650.00 ~~\$3,200.00~~ for plans to investigate on-site contamination including the tasks listed in Appendix F of this Part.
 - B) A total of \$4,090.00 ~~\$3,200.00~~ for plans to investigate off-site contamination including the tasks listed in Appendix F of this Part.
 - 2) Payment for costs associated with field work and field oversight to define the extent of contamination resulting from the release must not exceed a total of \$390.00 per half-day, plus travel costs in accordance with subsection (e) of this Section. The number of half-days must not exceed the following:
 - A) One half-day for every four soil borings, or fraction thereof, drilled as part of the investigation but not used for the installation of monitoring wells. Borings in which monitoring wells are installed must be included in subsection (d)(2)(B) of this Section instead of this subsection (d)(2)(A); and
 - B) One half-day for each monitoring well installed as part of the investigation.
 - 3) Payment for costs associated with obtaining access to off-site properties, including the tasks listed in Appendix F of this Part, must not exceed a total of \$400 for each off-site property to which access is sought.
 - 4) ~~3)~~ Payment for costs associated with well surveys conducted pursuant to Section 732.404(e)(1) of this Part, including the tasks listed in Appendix F of this Part, must not exceed a total of \$400.00 ~~\$160.00~~. Payment for costs associated with well surveys conducted pursuant to Section 732.404(e)(2) of this Part must be determined on a time and materials basis and must not exceed the amounts set forth in Section 732.850 of this Part.
 - 5) ~~4)~~ For conventional technology, payment for costs associated with the preparation and submission of corrective action plans, including the tasks listed in Appendix F of this Part, must not exceed a total of \$5,670.00 ~~\$5,120.00~~. For alternative technologies, payment for costs must

be determined on a time and materials basis and must not exceed the amounts set forth in Section 732.850 of this Part.

6) ~~5)~~ Payment for costs associated with high priority corrective action field work and field oversight must not exceed the following amounts:

A) For conventional technology, a total of \$390.00 per half-day, not to exceed one half-day for each 225 cubic yards, or fraction thereof, of soil removed and disposed, plus travel costs in accordance with subsection (e) of this Section.

B) For alternative technologies, payment for costs must be determined on a time and materials basis and must not exceed the amounts set forth in Section 732.850 of this Part.

7) ~~6)~~ Development of Tier 2 and Tier 3 Remediation Objectives. Payment of costs for professional consulting services associated with the development of Tier 2 and Tier 3 remediation objectives in accordance with 35 Ill. Adm. Code 742 must not exceed the following amounts:

A) Payment for costs associated with field work and field oversight for the development of remediation objectives must not exceed a total of \$390.00 per half-day, plus travel costs in accordance with subsection (e) of this Section. The number of half-days must not exceed the following:

i) One half-day for every four soil borings, or fraction thereof, drilled solely for the purpose of developing remediation objectives. Borings in which monitoring wells are installed must be included in subsection (d)(7)(A)(ii) ~~(d)(6)(A)(ii)~~ of this Section instead of this subsection (d)(7)(A)(i) ~~(d)(6)(A)(i)~~; and

ii) One half-day for each monitoring well installed solely for the purpose of developing remediation objectives.

B) Excluding costs set forth in subsection (d)(7)(A) ~~(d)(6)(A)~~ of this Section, payment for costs associated with the development of Tier 2 or Tier 3 remediation objectives, including the tasks listed in Appendix F of this Part, must not exceed a total of \$800.00.

8) ~~7)~~ Payment for costs associated with Environmental Land Use Controls and Highway Authority Agreements used as institutional controls pursuant to 35 Ill. Adm. Code 742, including the tasks listed in Appendix F of this Part, must not exceed a total of \$800.00 per Environmental Land Use Control or Highway Authority Agreement.

9) ~~8)~~ Payment for costs associated with the preparation and submission of high priority corrective action completion reports, including the tasks listed in Appendix F of this Part, must not exceed a total of \$4,865.00~~\$5,120.00~~.

e) Payment for costs associated with travel, including, but not limited to, travel time, per diem, mileage, transportation, vehicle charges, lodging, and meals, must not exceed the following amounts. Costs for travel must be allowed only when specified elsewhere in this Part.

<u>Distance to site (land miles)</u>	<u>Maximum total amount per calendar day</u>
<u>0 to 29</u>	<u>\$140.00</u>
<u>30 to 59</u>	<u>\$220.00</u>
<u>60 or more</u>	<u>\$300.00</u>

Distances must be measured in ground miles and rounded to the nearest mile. If a consultant maintains more than one office, distance to the site must be measured from the consultant's office that is closest to the site.

f) If a plan must be amended due to unforeseen circumstances, costs associated with the amendment of the plan and its associated budget plan, including the tasks listed in Appendix F of this Part, must not exceed a total of \$710.00~~\$640.00~~.

ATTACHMENT F TO IEPA'S POST-HEARING COMMENTS
PROPOSED SECTION 734.845

Section 734.845 Professional Consulting Services

Payment for costs associated with professional consulting services must not exceed the amounts set forth in this Section. Such costs must include, but not be limited to, those associated with project planning and oversight; field work; field oversight; travel; per diem; mileage; transportation; vehicle charges; lodging; meals; and the preparation, review, certification, and submission of all plans, budgets, reports, applications for payment, and other documentation. The maximum payment amounts set forth in this Section are not subject to the provisions of Section ~~734.845~~ ~~732.855~~ of this Part.

- a) Early Action and Free Product Removal. Payment of costs for professional consulting services associated with early action and free product removal activities conducted pursuant to Subpart B of this Part must not exceed the following amounts:
- 1) Payment for costs associated with preparation for the abandonment or removal of USTs, including the tasks listed in Appendix F of the Part, must not exceed a total of ~~\$1,095.00~~ ~~\$960.00~~.
 - 2) Payment for costs associated with early action field work and field oversight must not exceed a total of \$390.00 per half-day, plus travel costs in accordance with subsection (e) of this Section. The number of half-days must not exceed the following:
 - A) One half-day for field work and field oversight required to comply with Section 734.210(a) of this Part other than the mitigation of fire, explosion, or vapor hazards pursuant to Section 734.210(a)(3). Activities associated with the mitigation of fire, explosion, or vapor hazards pursuant to Section 734.210(a)(3) are subject to subsection (a)(4) of this Section instead of this subsection (a)(2)(A).
 - B) One half-day for field work and field oversight required to comply with Section 734.210(b) of this Part other than continued monitoring and mitigation of fire, explosion, or vapor hazards pursuant to Section 734.210(b)(3). Activities associated with continued monitoring and mitigation of fire, explosion, or vapor hazards pursuant to Section 734.210(b)(3) are subject to subsection (a)(4) of this Section instead of this subsection (a)(2)(B).
 - C) ~~A~~) If one or more USTs are removed, one half-day for each leaking UST that is removed, not to exceed a total of ten half-days, plus one half-day for each 225 cubic yards, or fraction thereof, of visibly contaminated fill material removed and disposed of in accordance with 734.210(f) of this Part;

- ~~D)B)~~ If one or more USTs remain in place, one half-day for every four soil borings, or fraction thereof, drilled pursuant to Section 734.210(h)(2) of this Part; ~~and~~
- ~~E)C)~~ One half-day if a UST line release is repaired; ~~and~~
- ~~F)~~ One half-day for field work and field oversight required for the preparation and submission of the 45-day report other than the field work and field oversight required under Section 734.210(a) and (b) of this Section.
- 3) Payment for costs associated with the preparation and submission of 20-day and 45-day reports and the Stage 1 plan certification required under Section 734.315(b) of this Part, including the tasks listed in Appendix F of this Part ~~and field work not covered by subsection (a)(2) of this Section~~, must not exceed a total of ~~\$2,485.00~~\$4,800.00.
- ~~4)~~ Payment for costs associated with the monitoring and mitigation of fire, explosion, or vapor hazards required under Sections 734.210(a)(3) and (b)(3) of this Part must be determined on a time and materials basis and must not exceed the amounts set forth in Section 734.850 of this Part.
- ~~5)4)~~ Payment for costs associated with the preparation and submission of free product removal plans and the installation of free product removal systems must be determined on a time and materials basis and must not exceed the amounts set forth in Section 734.850 of this Part.
- ~~6)5)~~ Payment for costs associated with the field work and field oversight for free product removal must not exceed a total of ~~\$390.00~~\$500.00 per half-day, plus travel costs in accordance with subsection (e) of this Section. The Agency must determine the reasonable number of half-days on a site-specific basis.
- ~~7)6)~~ Payment for costs associated with the preparation and submission of free product removal reports, including the tasks listed in Appendix F of this Part, must not exceed a total of ~~\$925.00~~\$1,600.00 per report.
- ~~8)7)~~ Payment for costs associated with the preparation and submission of reports submitted pursuant to Section 734.210(h)(3) of this Part, including the tasks listed in Appendix F of this Part, must not exceed a total of ~~\$290.00~~\$500.00.

- b) Site Investigation. Payment of costs for professional consulting services associated with site investigation activities conducted pursuant to Subpart C of this Part must not exceed the following amounts:
- 1) Payment for costs associated with preparation for the implementation of the Stage 1 site investigation preparation and submission, including the tasks listed in Appendix F of this Part, must not exceed a total of \$1,000.00~~\$1,600.00~~.
 - 2) Payment for costs associated with Stage 1 field work and field oversight must not exceed a total of \$390.00 per half-day, plus travel costs in accordance with subsection (e) of this Section. The number of half-days must not exceed the following:
 - A) One half-day for every four soil borings, or fraction thereof, drilled as part of the Stage 1 site investigation but not used for the installation of monitoring wells. Borings in which monitoring wells are installed must be included in subsection (b)(2)(B) of this Section instead of this subsection (b)(2)(A); and
 - B) One half-day for each monitoring well installed as part of the Stage 1 site investigation.
 - 3) Payment for costs associated with the preparation and submission of Stage 2 site investigation plans, including the tasks listed in Appendix F of this Part, must not exceed a total of \$4,090.00~~\$3,200.00~~.
 - 4) Payment for costs associated with Stage 2 field work and field oversight must not exceed a total of \$390.00 per half-day, plus travel costs in accordance with subsection (e) of this Section. The number of half-days must not exceed the following:
 - A) One half-day for every four soil borings, or fraction thereof, drilled as part of the Stage 2 site investigation but not used for the installation of monitoring wells. Borings in which monitoring wells are installed must be included in subsection (b)(4)(B) of this Section instead of this subsection (b)(4)(A); and
 - B) One half-day for each monitoring well installed as part of the Stage 2 site investigation.
 - 5) Payment for costs associated with the preparation and submission of Stage 3 site investigation plans, including the tasks listed in Appendix F of this Part, must not exceed a total of \$4,090.00. ~~Payment for costs associated with Stage 3 site investigations will be reimbursed pursuant to Section 734.850.~~

- 6) Payment for costs associated with Stage 3 field work and field oversight must not exceed a total of \$390.00 per half-day, plus travel costs in accordance with subsection (e) of this Section. The number of half-days must not exceed the following:
- A) One half-day for every four soil borings, or fraction thereof, drilled as part of the Stage 3 site investigation but not used for the installation of monitoring wells. Borings in which monitoring wells are installed must be included in subsection (b)(6)(B) of this Section instead of this subsection (b)(6)(A); and
 - B) One half-day for each monitoring well installed as part of the Stage 3 site investigation.
- 7) Payment for costs associated with obtaining access to off-site properties, including the tasks listed in Appendix F of this Part, must not exceed a total of \$400 for each off-site property to which access is sought.
- 8) ~~7~~ Payment for costs associated with well surveys conducted pursuant to Section 734.445(b) of this Part, including the tasks listed in Appendix F of this Part, must not exceed a total of ~~\$400.00~~~~\$160.00~~. Payment for costs associated with well surveys conducted pursuant to Section 734.445(c) of this Part must be determined on a time and materials basis and must not exceed the amounts set forth in Section 734.850 of this Part.
- 9) ~~8~~ Payment for costs associated with the preparation and submission of site investigation completion reports, including the tasks listed in Appendix F of this Part, must not exceed a total of ~~\$3,030.00~~~~\$1,600.00~~.
- c) Corrective Action. Payment of costs for professional consulting services associated with corrective action activities conducted pursuant to Subpart C of this Part must not exceed the following amounts:
- 1) For conventional technology, payment for costs associated with the preparation and submission of corrective action plans, including the tasks listed in Appendix F of this Part, must not exceed a total of ~~\$5,230.00~~~~\$5,120.00~~. For alternative technologies, payment for costs must be determined on a time and materials basis and must not exceed the amounts set forth in Section 734.850 of this Part.
 - 2) Payment for costs associated with corrective action field work and field oversight must not exceed the following amounts:
 - A) For conventional technology, a total of \$390.00 per half-day, not to exceed one half-day for each 225 cubic yards, or fraction thereof,

of soil removed and disposed, plus travel costs in accordance with subsection (e) of this Section.

- B) For alternative technologies, payment for costs must be determined on a time and materials basis and must not exceed the amounts set forth in Section 734.850 of this Part.
- 3) Payment for costs associated with Environmental Land Use Controls and Highway Authority Agreements used as institutional controls pursuant to 35 Ill. Adm. Code 742, including the tasks listed in Appendix F of this Part, must not exceed a total of \$800.00 per Environmental Land Use Control or Highway Authority Agreement.
 - 4) Payment for costs associated with the preparation and submission of corrective action completion reports, including the tasks listed in Appendix F of this Part, must not exceed a total of ~~\$4,865.00~~\$5,120.00.
- d) Development of Tier 2 or Tier 3 Remediation Objectives. Payment of costs for professional consulting services associated with the development of Tier 2 and Tier 3 remediation objectives in accordance with 35 Ill. Adm. Code 742 must not exceed the following amounts:
- 1) Payment for costs associated with field work and field oversight for the development of remediation objectives must not exceed a total of \$390.00 per half-day, plus travel costs in accordance with subsection (e) of this Section. The number of half-days must not exceed the following:
 - A) One half-day for every four soil borings, or fraction thereof, drilled solely for the purpose of developing remediation objectives. Borings in which monitoring wells are installed shall be included in subsection (d)(1)(B) of this Section instead of this subsection (d)(1)(A); and
 - B) One half-day for each monitoring well installed solely for the purpose of developing remediation objectives.
 - 2) Excluding costs set forth in subsection (d)(1) of this Section, payment for costs associated with the development of Tier 2 or Tier 3 remediation objectives, including the tasks listed in Appendix F of this Part, must not exceed a total of \$800.00.

- e) Payment for costs associated with travel, including, but not limited to, travel time, per diem, mileage, transportation, vehicle charges, lodging, and meals, must not exceed the following amounts. Costs for travel shall be allowed only when specified elsewhere in this Part.

<u>Distance to site (land miles)</u>	<u>Maximum total amount per calendar day</u>
0 to 29	\$140.00
30 to 59	\$220.00
60 or more	\$300.00

Distances shall be measured in ground miles and rounded to the nearest mile. If a consultant maintains more than one office, distance to the site shall be measured from the consultant's office that is closest to the site.

- f) If a plan must be amended due to unforeseen circumstances, costs associated with the amendment of the plan, including the tasks listed in Appendix F of this Part, and its associated budget shall not exceed a total of ~~\$710.00~~ \$640.00.

Party Name	Role	City & State	Phone/Fax
<u>Ogle County State's Attorney Office</u> Interested Party Michael C. Rock, Assistant State's Attorne	Ogle County Courthouse 110 South Fourth Street, P.O. Box 395	Oregon IL 61061- 0395	815/732-1170 815/732-6607
<u>Brown, Hay & Stephens LLP</u> Interested Party Claire A. Manning	700 First Mercantile Bank Building 205 South Fifth St., P.O. Box 2459	Springfield IL 62705- 2459	217/544-8491 217/241-3111
<u>IEPA</u> Petitioner Gina Roccaforte, Assistant Counsel Kyle Rominger, Assistant Counsel Doug Clay	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 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>Karaganis, White & Magel, Ltd.</u> Interested Party Barbara Magel	414 North Orleans Street Suite 810	Chicago IL 60610	312/836-1177 312/836-9083
<u>Illinois Petroleum Marketers Association</u> Interested Party Bill Fleischi	112 West Cook Street	Springfield IL 62704	217/793-1858
<u>United Science Industries, Inc.</u> Interested Party Joe Kelly, PE	P.O. Box 360 6295 East Illinois Highway 15	Woodlawn IL 62898- 0360	618/735-2411 618/735-2907
<u>Illinois Environmental Regulatory Group</u> Interested Party N. LaDonna Driver	3150 Roland Avenue	Springfield IL 62703	217/523-4942 217/523-4948
<u>Carlson Environmental, Inc.</u> Interested Party Kenneth James	65 E. Wacker Place Suite 1500	Chicago IL 60601	
<u>Chemical Industry Council of Illinois</u> Interested Party Lisa Frede	2250 E. Devon Avenue Suite 239	DesPlaines IL 60018- 4509	
<u>Barnes & Thornburg</u> Interested Party Carolyn S. Hesse, Attorney	1 North Wacker Drive Suite 4400	Chicago IL 60606	312/357-1313 312/759-5646
<u>Rapps Engineering & Applied Science</u> Interested Party Michael W. Rapps	821 South Durkin Drive P.O. Box 7349	Springfield IL 62791- 7349	217/787-2118 217/787-6641
<u>Environmental Management & Technologies</u>	2012 West College Avenue Suite 208	Normal IL 61761	309/454-1717 309/454-2711

Interested Party

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<u>Office of the Attorney General</u>	Environmental Bureau	Chicago	312/814-2550
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RoseMarie Cazeau, Bureau Chief			
<u>Herlacher Angleton Associates, LLC</u>	8731 Bluff Road	Waterloo	618/935-2262
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Tom Herlacher, P.E., Principal Engineer			
<u>Illinois Pollution Control Board</u>	100 W. Randolph St.	Chicago	312/814-3620
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Dorothy M. Gunn, Clerk of the Board			
Marie Tipsord, Hearing Officer			
<u>Huff & Huff, Inc.</u>	512 West Burlington Avenue	LaGrange	
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Scott Anderson			
<u>Posegate & Denes</u>	111 N. Sixth Street	Springfield	217-522-6152
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Claire A. Manning			
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Interested Party		IL 60174	
Melanie LoPiccolo, Office Manager			
<u>Illinois Department of Natural Resources</u>	One Natural Resources Way	Springfield	217/782-1809
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Joe Kelly, VP Engineering			
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Interested Party		IL 62703	
Joseph W. Truesdale, P.E.			
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Interested Party		IL 62704	
Ron Dye, President			
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Interested Party		IL 60515	
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Interested Party		il 61615	
Kurt Stepping, Director of Client Services			

<u>CW3M Company, Inc.</u> Interested Party Jeff Wienhoff	701 South Grand Ave. West	Springfield IL 62704	217-522-8001
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<u>MACTEC Engineering & Consulting, Inc.</u> Interested Party Terrence W. Dixon, P.G.	8901 N. Industrial Road	Peoria IL 61615	
<u>Illinois Department of Transportation</u> Interested Party Steven Gobelman	2300 S. Dirksen Parkway Room 330	Springfield IL 62764	
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<u>Herlacher Angleton Associates, LLC</u> Interested Party Jennifer Goodman	522 Belle Street	Alton IL 62002	
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<u>American Environmental Corp.</u> Interested Party Ken Miller, Regional Manager	3700 W. Grand Ave., Suite A	Springfield IL 62707	217/585-9517
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<u>Secor International, Inc.</u> Interested Party Daniel J. Goodwin	400 Bruns Lane	Springfield IL 62702	
<u>Caterpillar, Inc.</u> Interested Party Eric Minder, Sr. Environmental Engineer	100 NE Adams Street	Peoria IL 61629	3096751658
<u>K-Plus Environmental</u> Interested Party Daniel Caplice	Suite 1000 600 W. Van Buren Street	Chicago IL 60607	312-207-1600
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<u>GEI Consultants, Inc.</u>	500 Chesterfield Center	St. Louis	

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Daniel J. Goodwin, P.E.

Total number of participants: 50