

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF:	)	
	)	
UNDERGROUND STORAGE TANKS	)	
(35 ILL. ADM. CODE 731) AND	)	
PETROLEUM LEAKING	)	R 11-22
UNDERGROUND STORAGE TANKS	)	(Rulemaking – Land)
(35 ILL. ADM CODE 732 and 734)	)	
	)	

**NOTICE OF FILING**

TO:

Clerk  
 Illinois Pollution Control Board  
 James R. Thompson Center  
 100 West Randolph Street, Suite 11-500  
 Chicago, Illinois 60601

Timothy Fox, Hearing Officer  
 Illinois Pollution Control Board  
 James R. Thompson Center  
 100 West Randolph Street, Suite 11-500  
 Chicago, Illinois 60601

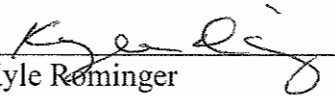
Division Chief of Environmental Enforcement  
 Office of the Attorney General  
 100 West Randolph St., Suite 1200  
 Chicago IL 60601

Office of Legal Services  
 Illinois Department of Natural Resources  
 One Natural Resources Way  
 Springfield IL 62702-1271

Attached Service List

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

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By:   
 Kyle Rominger  
 Deputy General Counsel  
 Division of Legal Counsel

DATE: 6.2.11  
 Illinois Environmental Protection Agency  
 1021 North Grand Ave. East  
 P.O. Box 19276  
 Springfield, Illinois 62794-9276  
 217/782-5544

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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UNDERGROUND STORAGE TANKS	)	
(35 ILL. ADM. CODE 731) AND	)	
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	)	

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S  
POST HEARING COMMENTS

NOW COMES the Illinois Environmental Protection Agency (Illinois EPA) and submits the following post-hearing comments following the May 10, 2011, hearing:

Responses to Board Questions

The Illinois EPA submits the following in response to questions asked by the Hearing Officer at the May 10 hearing:

1. LUST Advisory Committee. At the May 10 hearing, the Hearing Officer requested that the Illinois EPA submit the names and contact information of the members of the LUST Advisory Committee established in 35 Ill. Adm. Code 734.150 (Section 734.150). Transcript of May 10, 2011, hearing at 64-65. The purpose of this request was to ensure that the LUST Advisory Committee members are a part of either a service list or notice list. Id. at 65.

Section 734.150 requires the Illinois EPA to meet with the LUST Advisory Committee once each calendar quarter to discuss the Illinois EPA's implementation of Part 734, provided the Illinois EPA or members of the Committee raise one or more issues for discussion. An identical provision that applies to Part 732 is found at 35 Ill. Adm. Code 732.114 (Section 732.114). Since the adoption of Sections 732.114 and 734.150 the Illinois EPA has met with

various individuals involved with different organizations identified in Sections 732.114 and 734.150 to discuss issues involving the LUST Program. However, to date the Illinois EPA has not received a request from one of the organizations identified in Sections 732.114 and 734.150 to discuss an issue with the LUST Advisory Committee. Therefore, the Committee's members have not yet been identified. Please note that, with the possible exception of the Office of the State Fire Marshal, persons representing or involved with most, if not all, of the organizations identified in Sections 732.114 and 734.150 were on the service list or notice list for the last LUST rulemaking and therefore would have been included on the initial service list and notice list created by the Hearing Officer for this rulemaking.

2. Need for on-site remediation to address off-site contamination. At the May 10 hearing, the Hearing Officer asked if the Illinois EPA had any comment on CW<sup>3</sup>M's proposed language for 35 Ill. Adm. Code 734.360(c) and (d), and 35 Ill. Adm. Code 734.630(ddd) and (fff). Transcript of May 10, 2011, hearing at 73. Mr. Albarracin indicated that the Illinois EPA would respond in writing. Please see items 4 - 6 in the comments to CW<sup>3</sup>M's pre-filed testimony included below.

3. Apparent typographical error in proposed 35 Ill. Adm. Code 734.855(c)(2)(B). At the May 10 hearing, the Hearing Office noted an apparent typographical error of "transportation errors" in proposed subsection 734.855(c)(2)(B). Transcript of May 10, 2011, hearing at 74. "Transportation errors" is a typographical error. It should read "transposition errors".

Comments on "Pre-Filed Testimony & Revised Regulations from CW<sup>3</sup>M Company, Inc.".

The Illinois EPA offers the following comments on the "Pre-Filed Testimony and Revised Regulations from CW<sup>3</sup>M Company, Inc." entered as Exhibit 4:

1. Section 734.120 -- Incorporations by reference. CW<sup>3</sup>M proposes that new versions of materials incorporated by reference should be automatically accepted as rules instead of the Board amending its rules to incorporate new versions as they become available. The Illinois EPA proposes to incorporate only the latest version of ASTM D2487-10 due to the limitations set forth in the Administrative Procedure Act (APA), which provides that incorporations by reference must state that no later amendments or editions are included. 5 ILCS 100/5-75. This limitation is reflected in 35 Ill. Adm. Code 734.120(b). As a result, the Board's rules cannot be amended via a revision to the material that is incorporated by reference. New or revised materials must be adopted as rules through a rulemaking that complies with the APA.

2. Subsection 734.210(a)(1) – Immediate reporting of a release. CW<sup>3</sup>M points out that the Office of the State Fire Marshal's (OSFM) rules require releases to be reported to several entities other than the Illinois Emergency Management Agency (IEMA). The intent of the Illinois EPA's proposed changes to subsection 734.210(a) was to make the subsection consistent with OSFM rules. However, it has become apparent that the proposed change to subsection 734.210(a)(1) has caused confusion. The Illinois EPA agrees with Vince Smith's testimony at the May 10 hearing that the Board's rules need to be clear. Transcript of May 10, 2011, hearing at 84, 85.

As stated in the Illinois EPA's proposal, the reason for the proposed changes to subsection 734.210(a) is to mirror the fact that the OSFM's rules now require the confirmation of suspected releases to be reported immediately instead of within 24 hours. To avoid confusion over who must be notified for purposes of complying with the Board's rules, the Illinois EPA submits the following revised amendment to subsection 734.210(a)(1):

- 1) Immediately report ~~Report~~ the release to IEMA (e.g., by telephone or electronic mail);

This revised amendment makes it clear that a report to IEMA satisfies the reporting requirements of the Board's rules.

3. Subsections 734.210(c), (d), (e), and (g). CW<sup>3</sup>M objects to reducing “plus 14 days” to “plus 7 days” in subsections 734.210(c), (d), (e), and (g). As stated by the Illinois EPA, these reductions are proposed for consistency with the OSFM's recent reduction in the time for confirming releases from 14 days to 7 days. See 41 Ill. Adm. Code 176.310(b).

The “plus \_\_ days” timeframe for certain early action activities was added to the Board's rules in 2002 to recognize the time for confirming suspected releases under the OSFM's rules. See Regulation of Petroleum Leaking Underground Storage Tanks; Amendments to 35 Ill. Adm. Code 732, R01-26, Second Notice Opinion and Order at 7-8 (February 21, 2002). The timeframe initially added to the Board's rules was “plus 7 days” because in 2002 the OSFM's rules required suspected releases to be confirmed within 7 days. Id. at 7. “Plus 7 days” was later changed to the current “plus 14 days” to reflect a 2003 change to the OSFM's rules. Proposed Amendments to Regulation of Petroleum Leaking Underground Storage Tanks (35 Ill. Adm. Code 732), R04-22, Ex. 5 at 4-5; Regulation of Petroleum Leaking Underground Storage Tanks (Proposed New 35 Ill. Adm. Code 734), R04-23, Ex. 6 at 3. In 2010, the OSFM returned to the original 7 days for confirming suspected releases. See 176 Ill. Adm. Code 176.310(b). As noted by Hernando Albarracin at the May 10 hearing, 7 days to confirm a suspected release is consistent with the federal underground storage tank rules. See 40 C.F.R. 280.52.

CW<sup>3</sup>M states that reverting to the original “plus 7 days” timeframe added to the Board's rules in 2002 puts undue pressure on contractors and consultants to complete the work needed for the submission of a 45 Day Report. CW<sup>3</sup>M cites factors such as weather conditions, and, if tanks are being removed, factors such as the availability of drill rigs, the need to obtain permits,

the mobilization of equipment, and the scheduling of an OSFM Tank Specialist. The 45 Day report, however, is essentially a status report. See 35 Ill. Adm. Code 734.210(d) and (e). It does not require the pulling of tanks, the mobilization of equipment, or the drilling of boreholes. It only requires the assembling and submission of certain information to provide a status of the activities conducted to date. Activities that are not conducted within the first 45 days plus 7 days after release confirmation are not prohibited from occurring later. They just need to be approved in a plan, and if payment from the Underground Storage Tank (UST) Fund is sought they need to be approved in a budget as well. Furthermore, as Hernando Albarracin noted at the May 10 hearing, the Illinois EPA can approve an extension of the 45 Day plus 7 day timeframe for certain activities if special circumstances warrant an extension. See 35 Ill. Adm. Code 734.210(g).

The above being said, after reviewing the history of this provision again the Illinois EPA understands the frustration that may be felt from another change to the “plus \_\_\_\_ days” timeframe. Although federal underground storage tank rules set forth a 7 day period for confirming suspected releases, they also allow “another reasonable time period specified by the implementing agency”. 40 C.F.R. 280.52. The Illinois EPA would not object if the Board chose to retain the “plus 14 days” timeframe in subsections 734.210(c), (d), (e), and (g) in order to maintain regulatory consistency within the Board’s rules. If the “plus 14 days” is retained, the Board may wish to consider deleting the Board Note following subsection 734.210(g) because “plus 14 days” no longer corresponds to the OSFM’s rules.

4. Subsections 734.360(c) and (d). The Illinois EPA agrees there may be situations where on-site soil remediation may be necessary to prevent off-site groundwater contamination. The language proposed by CW<sup>3</sup>M, however, is too broad. The requirements to use a

groundwater ordinance or other institutional control to address groundwater contamination should not be entirely thrown out if on-site remediation is needed to address off-site contamination. The Illinois EPA submits the following revisions to proposed subsections 734.360(c) and (d) to allow a site-by-site review and approval of these situations, which is the Illinois EPA's current practice. Changes to the Illinois EPA's original proposal are indicated by double underlining.

Section 734.360 Application of Certain TACO Provisions

*For purposes of payment from the Fund, corrective action activities required to meet the minimum requirements of this Part shall include, but not be limited to, the following use of the Board's Tiered Approach to Corrective Action Objectives rules adopted under Title XVII of the Act: [415 ILCS 5/57.7(c)(3)(A)]*

- a) *For the site where the release occurred, the use of Tier 2 remediation objectives that are no more stringent than Tier 1 remediation objectives. [415 ILCS 5/57.7(c)(3)(A)(i)]*
- b) *The use of industrial/commercial property remediation objectives, unless the owner or operator demonstrates that the property being remediated is residential property or is being developed into residential property. [415 ILCS 5/57.7(c)(3)(A)(ii)]*
- c) If a groundwater ordinance already approved by the Agency for use as an institutional control in accordance with 35 Ill. Adm. Code 742 can be used as an institutional control for the release being remediated, the groundwater ordinance must be used as an institutional control, provided that the Agency may approve remediation to the extent necessary to remediate or prevent groundwater contamination at off-site property that is not subject to a groundwater ordinance already approved by the Agency for use as an institutional control.
- d) If the use of a groundwater ordinance as an institutional control is not required pursuant to subsection (c) of this Section, another institutional control must be used in accordance with 35 Ill. Adm. Code 742 to address groundwater contamination at the site where the release occurred, provided that the Agency may approve remediation to the extent necessary to remediate or prevent groundwater contamination at off-site property that is not subject to a groundwater ordinance or other institutional control that is used to address groundwater contamination. Institutional controls used to comply with this subsection (d) include, but are not limited to, the

following:

1) Groundwater ordinances that are not required to be used as institutional controls pursuant to subsection (c) of this Section.

2) No Further Remediation Letters that prohibit the use and installation of potable water supply wells at the site.

5. Subsection 734.630(ddd). CW<sup>3</sup>M's proposed change to subsection 734.630(ddd) is too broad and inconsistent with Title XVI of the Environmental Protection Act (Act). The Illinois EPA recognizes that in certain cases on-site soil remediation may be necessary to address off-site contamination, and that issue is addressed in item 4 above. Payment of remediation costs from the UST Fund, however, is limited by subsection 57.7(c)(3)(A)(ii) of the Act (415 ILCS 57.7(c)(3)(A)(ii)), which limits payment to the achievement of industrial/commercial objectives unless the property is demonstrated to be residential property or is being developed into residential property. This statutory provision cannot be circumvented by a rule.

Furthermore, the issue of conducting on-site soil remediation to address off-site contamination involves the soil component of the groundwater ingestion exposure route, which is based upon whether a site has Class I or Class II groundwater rather than an industrial/commercial or residential property use. As noted, the Illinois EPA has addressed the issue of on-site soil remediation to address off-site contamination in item 4 above. To clarify that proposed subsection 734.630(ddd) does not prevent the payment of costs for on-site soil remediation that is approved by the Illinois EPA pursuant to revised proposed subsections 734.360(c) and (d) above, the Illinois EPA proposes to add the following Board Note after subsection 734.630(ddd):

Board Note: Subsection (ddd) does not prohibit the payment of costs associated with remediation approved by the Agency pursuant to subsection 734.360(c) or (d) to remediate or prevent groundwater contamination at off-site property.



In addition, when reviewing proposed subsection 734.630(ddd), the Illinois EPA discovered that it is missing a word that is included in subsection 57.7(c)(3)(A)(ii) of the Act and the corresponding proposed subsection 734.360(b). Therefore, the Illinois EPA proposes the following revision to proposed subsection 734.630(ddd). Changes to the Illinois EPA's original proposal are indicated by double underlining.

ddd) Costs associated with corrective action to achieve remediation objectives other than industrial/commercial property remediation objectives, unless the owner or operator demonstrates that the property being remediated is residential property or is being developed into residential property.

6. Subsection 734.630(fff). As noted above, the Illinois EPA recognizes that in certain cases on-site soil remediation may be necessary to prevent off-site contamination when groundwater use restrictions are used as institutional controls. Similar to the Board Note proposed above for subsection 734.630(ddd), the Illinois EPA proposes the following Board Notes after proposed subsections 734.630(eee) and (fff) to clarify that those subsections likewise do not prevent the payment of costs of remediation approved by the Illinois EPA pursuant to proposed subsections 734.360(c) or (d). Changes to the Illinois EPA's original proposal are indicated by double underlining.

eee) Costs associated with groundwater remediation if a groundwater ordinance must be used as an institutional control under subsection (c) of Section 734.360 of this Part.

Board Note: Subsection (eee) does not prohibit the payment of costs associated with remediation approved by the Agency pursuant to subsection 734.360(c) to remediate or prevent groundwater contamination at off-site property.

fff) Costs associated with on-site groundwater remediation if an institutional control is required to address on-site groundwater remediation under subsection (d) of Section 734.360 of this Part

Board Note: Subsection (fff) does not prohibit the payment of costs associated with remediation approved by the Agency pursuant to

subsection 734.360(d) to remediate or prevent groundwater contamination at off-site property.

7. Section 734.632. The Illinois EPA does not object to amending subsection 734.632(d) to include “Tier 1” as proposed by CW<sup>3</sup>M. The proposed addition of “including the groundwater pathway”, however, is not clear and appears unnecessary. There is no exposure route under 35 Ill. Adm. Code 742 (TACO) that is identified as “the groundwater pathway”. Furthermore, the general references to remediation objectives in subsection 734.632(d) include the objectives for all exposure routes. None of the references contain language limiting remediation objectives to only particular exposure routes. A reference to “Tier 1 residential remediation objectives” is sufficient to include the objectives for all exposure routes under TACO.

The Illinois EPA does not oppose language to clarify soil disposal costs that are eligible for payment from the UST Fund pursuant to subsection 734.632(d). However, based upon CW<sup>3</sup>M’s comments the intent of its proposed subsection 734.632(f) is too broad. The “re-opener” under subsection 734.632(d) is not a requirement to conduct additional investigation and remediation. The re-opener applies only in cases where remediation has been completed and the Agency has issued a No Further Remediation Letter. No additional response is required under the LUST Program. The re-opener merely makes the cost of disposing of soil that is removed during subsequent construction activities eligible for payment from the UST Fund if off-site disposal is necessary. Note the distinction in the references to “corrective action” in proposed subsections 734.632(a), (b), and (c), and the references to “disposal” in proposed subsections 734.632(d) and (e).

The Illinois EPA submits the following revisions to proposed Section 734.632 to help clarify the costs that are eligible for payment from the UST Fund pursuant to the re-opener in

subsection 734.632(d). Revisions to the first paragraph of proposed Section 734.632 clarify that plans, budgets, and reports are not needed for disposal costs incurred pursuant to subsections 734.632(d) and (e). In these situations the Illinois EPA believes it will be more cost-effective to just have the owner or operator submit documentation of the costs they incur to dispose of soil or excavation water. The Illinois EPA believes that CW<sup>3</sup>M's proposed subsection (f) should not be added because (i) it is unnecessary given the first paragraph of proposed Section 734.632, and (ii) by singling out consulting fees from all other corrective action costs it calls into question the eligibility of other corrective action costs that are not specifically mentioned. However, if the Board decides to include such a provision, the Illinois EPA proposes that it be amended as set forth below to help clarify the re-openers for which consulting fees would be appropriate. Changes to the Illinois EPA's original proposal are indicated by double underlining.

Section 734.632 Eligible Corrective Action Costs Incurred After NFR Letter

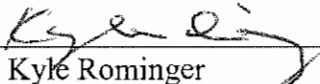
Notwithstanding subsections (gg) and (nn) of Section 734.630 of this Part, [t]he following shall be considered corrective action activities eligible for payment from the Fund even when an owner or operator conducts these activities after the issuance of a No Further Remediation Letter. Corrective action conducted under this Section and costs incurred under this Section must comply with the requirements of Title XVI of the Act and this Part, including, but not limited to, requirements for the submission and Agency approval of corrective action plans and budgets, corrective action completion reports, and applications for payment, provided that no plan, budget, or report is required for activities conducted pursuant to subsections (d) or (e) of this Section.

- a) Corrective action to achieve residential property remediation objectives if the owner or operator demonstrates that property remediated to industrial/commercial property remediation objectives pursuant to subdivision (c)(3)(A)(ii) of Section 57.7 of the Act and subsection (b) of Section 734.360 of this Part is being developed into residential property.
- b) Corrective action to address groundwater contamination if the owner or operator demonstrates that such action is necessary because a groundwater ordinance used as an institutional control pursuant to subdivision (c)(3)(A)(iii) of Section 57.7 of the Act and subsection (c) of Section 734.360 of this Part can no longer be used as an institutional control.

- c) Corrective action to address groundwater contamination if the owner or operator demonstrates that such action is necessary because an on-site groundwater use restriction used as an institutional control pursuant to subdivision (c)(3)(A)(iv) of Section 57.7 of the Act and subsection (d) of Section 734.360 of this Part must be lifted in order to allow the installation of a potable water supply well due to public water supply service no longer being available for reasons other than an act or omission of the owner or operator.
- d) The disposal of soil that does not exceed industrial/commercial property remediation objectives, but that does exceed Tier 1 residential property remediation objectives, if industrial/commercial property remediation objectives were used pursuant to subdivision (c)(3)(A)(ii) of Section 57.7 of the Act and subsection (b) of Section 734.360 of this Part and the owner or operator demonstrates that (i) the contamination is the result of the release for which the owner or operator is eligible to seek payment from the Fund and (ii) disposal of the soil is necessary as a result of construction activities conducted after the issuance of a No Further Remediation Letter on the site where the release occurred, including, but not limited to, the following: tank, line, or canopy repair, replacement, or removal; building upgrades; sign installation; and water or sewer line replacement. Costs eligible for payment under this subsection (d) are the costs to transport the soil to a properly permitted disposal site and disposal site fees.
- e) The disposal of water exceeding groundwater remediation objectives that is removed from an excavation on the site where the release occurred if a groundwater ordinance is used as an institutional control pursuant to subdivision (c)(3)(A)(iii) of Section 57.7 of the Act and subsection (c) of Section 734.360 of this Part, or if an on-site groundwater use restriction is used as an institutional control pursuant to subdivision (c)(3)(A)(iv) of Section 57.7 of the Act and subsection (d) of Section 734.360 of this Part, and the owner or operator demonstrates that (i) the excavation is located within the measured or modeled extent of groundwater contamination resulting from the release for which the owner or operator is eligible to seek payment from the Fund and (ii) disposal of the groundwater is necessary as a result of construction activities conducted after the issuance of a No Further Remediation Letter on the site where the release occurred, including, but not limited to, the following: tank, line, or canopy repair, replacement, or removal; building upgrades; sign installation; and water or sewer line replacement. [415 ILCS 5/57.19].
- f) Consulting fees for corrective action conducted pursuant to subsections (a), (b), and (c) of this Section. Consulting fees shall be subject to Subpart H of this Part.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By:   
\_\_\_\_\_  
Kyle Rominger  
Deputy General Counsel

Dated: 6.2.11  
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(217) 782-5544

STATE OF ILLINOIS )  
 )  
COUNTY OF SANGAMON )

**PROOF OF SERVICE**

I, the undersigned, on oath state that I have served the attached Illinois Environmental Protection Agency's Post Hearing Comments upon the persons to whom they are directed, by placing a copy of each in an envelope addressed to:

Clerk (Electronically Filed)  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph Street, Suite 11-500  
Chicago, Illinois 60601

Timothy Fox, Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center  
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Office of the Attorney General  
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Office of Legal Services  
Illinois Department of Natural Resources  
One Natural Resources Way  
Springfield IL 62702-1271

Attached Service List

and mailing them (First Class Mail) from Springfield, Illinois on June 2, 2011 with sufficient postage affixed as indicated above.

      *Karen Loh*      

SUBSCRIBED AND SWORN TO BEFORE ME

This   *2nd*   day of   *June*  , 2011.

      *Cynthia L. Wolfe*        
Notary Public



\*\*\*\*\*PC# 1\*\*\*\*\*

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R11-22

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