



**Chemical Industry
Council of
Illinois**

February 1, 2013

Richard McGill
Illinois Pollution Control Board
100 West Randolph, Suite 11-500
Chicago, IL 60601

Subject: Public Comments Regarding the Proposed Amendments to Tiered Approach to Corrective Action Objectives (TACO) (Indoor Inhalation); R11-9

Dear Mr. McGill,

I am writing on behalf of the Chemical Industry Council of Illinois (CICI) in regard to providing public comment in response to the Illinois Pollution Control Board's (IPCB) January 10, 2013 Opinion and Order for its Proposed Second Notice in the subject referenced above.

CICI is a state-wide business trade association representing the chemical industry in Illinois. CICI represents 211 member companies employing over 45,648 workers at an average annual wage of \$80,748 in 726 manufacturing facilities and 877 wholesale and distribution facilities in Illinois.

CICI has had a representative on the Site Remediation Advisory Committee (SRAC) and has worked closely with the Illinois Environmental Protection Agency (Agency) to come to a consensus regarding the proposed Indoor Inhalation rule. The two organizations have spent many hours to come up with a clear and concise rule to present to the IPCB.

CICI has read the public comments submitted to the IPCB by the Illinois Manufacturer's Association, the Site Remediation Advisory Committee and the Illinois Environmental Protection Agency. CICI agrees with all three submitted commenters regarding the issues brought forth by the IPCB in the proposal of second notice to include: Source-Building Horizontal Separation Distance Standard; Institutional Controls When Full Concrete Floor is Modeled; the requirement to Use Soil Gas in Determining the Appropriate Transport Mechanism; and Whether to Apply Similar-Acting Chemical Provisions When Developing Remediation Objectives.

CICI appreciates the opportunity to support the stakeholders and provide comments on this matter.

Sincerely,

A handwritten signature in black ink that reads "Lisa Frede". The signature is written in a cursive style and is contained within a thin black rectangular border.

Lisa Frede
CICI, Director of Regulatory Affairs

Headquarters

1400 E. Touhy Ave., Suite 110, Des Plaines, IL 60018 • Tel: (847) 544-5995 • Fax: (847) 544-5999

Springfield

400 W. Monroe, Suite 205, Springfield, IL 62704 • Tel: (217) 522-5805 • Fax: (217) 522-5815

Website: www.cicil.net