BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	R 2022-18(A)
PROPOSED AMENDMENTS TO	)	
GROUNDWATER QUALITY	)	(Rulemaking)
35 ILL. ADM. CODE 620 (SUBDOCKET A)	)	

NOTICE

TO: Don A. Brown, Clerk
Illinois Pollution Control Board
60 E. Van Buren Street
Suite 630
Chicago, Illinois 60605
(VIA ELECTRONIC MAIL)

Chloe Salk, Hearing Officer
Vanessa Horton, Hearing Officer
Illinois Pollution Control Board
60 E. Van Buren Street
Suite 630
Chicago, Illinois 60605
(VIA ELECTRONIC MAIL)

See attached Service List

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Illinois Pollution Control Board Illinois Environmental Protection Agency's Responses to Illinois Pollution Control Board's August 6, 2025 Order, a copy of which are herewith served upon you along with this notice.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Trevor D. Dell'Aquila
Trevor D. Dell'Aquila
Assistant Counsel
Division of Legal Counsel

DATED: August 11, 2025

115 South LaSalle Street
Suite 2203
Chicago, Illinois 60603
312-832-0025
trevor.dellaquila@illinois.gov

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S RESPONSES TO ILLINOIS POLLUTION CONTROL BOARD'S AUGUST 6, 2025 ORDER

Illinois Environmental Protection Agency's ("IEPA" or "Agency") Responses to the Illinois Pollution Control Board's (the "Board") questions raised in its August 6, 2025 Order:

Board Question 1(a):

1. On page 3, IEPA states that while "there may be concerns about replacing entire monitoring networks due to potential interference, the Agency anticipates that background values for groundwater can be established using existing groundwater monitoring networks that are adequate for detecting a potential release."

    a. Please explain for the record the types of potential interference that may be encountered during sampling of groundwater monitoring wells at nonhazardous waste landfills.

Agency Response:

It should be noted that the concerns referenced above are general concerns that have been raised by others in the context of sampling groundwater for PFAS. They are not concerns of the Illinois EPA. Because PFAS compounds are ubiquitous in consumer products that may be used by sample collectors, and in industrial materials used to construct and sample monitoring wells, there is a potential for PFAS to be introduced into samples through contact with (or proximity to) such materials. Potential interferences include contamination from sampling equipment containing fluoropolymers, PFAS-treated materials in the field, or inadequately decontaminated reusable equipment; ambient sources such as airborne dust, precipitation, PFAS-treated clothing, or personal care products; leaching or adsorption from sample containers or caps with fluoropolymer components; and contributions from well construction materials, including PTFE tape or fluoropolymer tubing. However, these potential interferences can be mitigated by following proper PFAS-specific sampling protocols and QA/QC requirements in the analytical methods incorporated by reference, thereby enabling the use of existing wells to produce defensible groundwater PFAS data without requiring the replacement of entire monitoring well networks.

Board Question 1(b):

b. Comment on the measures that may be undertaken to minimize groundwater sampling interference for PFAS analysis without replacing the monitoring well.

Agency Response:

A number of measures may be implemented to minimize sampling interference for PFAS analysis including: requiring supplier or lab certification that materials used for sample collection are PFAS-free, following method-specific procedures regarding preservation and storage, incorporating field reagent blanks, trip blanks, and equipment blanks, replacing legacy tubing with PFAS-free materials, and sampling personnel avoiding use of PFAS-containing clothing or personal products.

Board Question 1(c):

c. Please clarify whether the concerns due to potential sampling interference are limited to background (upgradient) wells or do they also apply to downgradient monitoring wells.

Agency Response:

Due to the ubiquitous nature of PFAS and similar construction of monitoring wells across a single monitoring well network, concerns expressed about sampling groundwater for PFAS typically are not limited to upgradient wells.

Board Question 1(d):

d. Also, would it possible to install additional monitoring wells for sampling PFAS instead of replacing entire groundwater monitoring network at affected landfills?

Agency Response:

Yes. If additional monitoring wells were installed for PFAS sampling, the number and placement of wells would be based on need and site-specific circumstances. It would not automatically require an across-the-board replacement of the entire monitoring well network.

Board Question 2:

2. On page 3, IEPA states that an immediate impact of applying the Part 620 PFAS standards to Part 811 and 814 landfills would not include routine sampling of these constituents for landfills subject to detection monitoring. Please clarify under what circumstance would IEPA add PFAS constituents to the list of constituents to be monitored at Parts 807, 811, and 814 landfills currently subject to detection monitoring.

Agency Response:

Under the existing Part 811 and 814 regulations, landfills would be required to establish background values for PFAS constituents. However, the Illinois EPA currently does not plan to propose the addition of PFAS to the list of constituents analyzed during detection monitoring. If there is a confirmed exceedance of one of the constituents analyzed during detection monitoring, further evaluation would be needed to determine whether there has been an impact to groundwater from leachate. If further evaluation confirmed an impact to groundwater from leachate, then sampling for PFAS, along with sampling for all other Part 620 parameters, would be conducted as part of an Assessment Monitoring Program. In addition to the increase in parameters analyzed, the sampling frequency would be increased to quarterly or semi-annually as determined by the Agency.

Part 807 landfills analyze samples for all Part 620 parameters annually as part of detection monitoring; therefore, they will analyze for PFAS on an annual basis along with all other Part 620 parameters. If a Part 807 landfill is required to conduct an Assessment Monitoring Program due to a confirmed exceedance of a Part 620 parameter, or is required to perform a Corrective Action Monitoring Program due to a PFAS release, as with the Part 811 and 814 facilities, sampling frequency would be increased to quarterly or semi-annually as determined by the Agency.

Board Question 3(a):

3. On page 3, IEPA states that "there are currently 91 landfills subject to Part 811 or Part 814 permits, of which one is currently seeking expansion, Eco Hill Landfill (BOL ID 0730200003)."

    a. Please clarify whether the 91 permitted landfills mentioned above include closed landfills under postclosure care.

Agency Response:

Yes, the 91 permitted landfills include closed landfills under post-closure care.

Board Question 3(b):

b. If so, how many of these landfills are closed but still monitoring groundwater as a part of postclosure care?

Agency Response:

Of these, there are 56 closed landfills. All 56 are still in post-closure care, and therefore monitoring groundwater is required by the post-closure care provisions of the regulations.

Board Question 3(c):

c. How many of the of 91 landfills are Subtitle D compliant with composite liner system?

Agency Response:

While all of the 91 landfills are in compliance with their applicable regulations, the 36 active municipal solid waste landfills permitted under 35 Ill. Adm. Code 811 are fully compliant with the federal Subtitle D criteria. The remaining units include Part 814 Subpart D facilities in post-closure care and are not Subtitle D compliant unless they have been re-permitted and upgraded to meet Part 811 standards.

Board Question 3(d):

d. Comment on whether all Subtitle D compliant landfills are currently operating in detection monitoring mode.

Agency Response:

All are in detection monitoring. However, select wells at a particular facility may also be subject to assessment and/or corrective action monitoring requirements, depending upon a facility's individual circumstances.

Board Question 3(e):

e. Are any of the 91 permitted landfills located within close proximity of drinking water well setback zones or over Class I groundwater aquifers like Mahomet aquifer? If so, should these landfills be required to monitor for PFAS to protect drinking water sources?

Agency Response:

Without defining "close proximity" Illinois EPA notes there are permitted landfills located over Class I groundwater aquifers, including the Mahomet Aquifer, or near water well setback zones. Examples include the Clinton Landfill (DeWitt County), Brickyard Disposal (Vermilion County), Indian Creek Landfill (Tazewell County), and Macon County Landfill #2, all of which are situated in hydrogeologically sensitive areas used for public or private water supplies. Illinois law prohibits siting new landfills within the established minimum or maximum setback zones around community water supply wells; however, older facilities may pre-date these requirements and remain near active drinking water sources.

Illinois landfill regulations do not currently require PFAS monitoring at municipal

solid waste landfills, and permitted facilities do not test leachate or groundwater for PFAS. By implementing PFAS monitoring, Illinois would take a proactive step to minimize the impact these persistent PFAS compounds would have on groundwater should a release occur, including groundwater used as a source of drinking water. Such precautionary action aligns with the State's goal of protecting groundwater as a resource for current and future generations.

Board Question 4(a):

4. Does the Agency have records regarding ownership information for the 91 permitted landfills subject to Part 811 or Part 814 permits?

    a. If so, please provide a breakdown in terms of those owned by private companies and municipalities.

Agency Response:

Yes, the Agency has records reflecting landfill ownership information. 35 Ill. Adm. Code 812 does not require a permit application specify if a landfill facility is private or municipal. Based on a review of the 91 landfills, 84 (approximately 92%) were found to be owned by private companies, while 7 (approximately 8%) were found to be owned by municipalities.

Board Question 4(b):

b. If ownership changed during the life of these landfills, please provide all ownership data the Agency has maintained.

Agency Response:

Historical ownership records for the individual landfills are not readily available.

Board Question 4(c):

c. Please provide an estimated range of revenue generated by privately owned landfills under Part 811 and 814 (Subpart C and D) landfills during their active life.

Agency Response:

The Agency does not have information regarding landfill revenue.

Board Question 4(d):

d. Please provide an estimated range of revenue generated by municipally owned landfills under Part 811 and 814 (Subpart C and D) landfills during their active life.

Agency Response:

The Agency does not have information regarding landfill revenue.

Board Question 4(e):

e. For questions (b) and (c), if actual cost information is not available, please provide estimated revenue based on tipping fees and annual waste volume accepted by the landfills.

Agency Response:

Based on the Environmental Research & Education Foundation (EREF) 2024 Analysis of Municipal Solid Waste Landfill Tipping Fees, the average tipping fee for Illinois municipal solid waste landfills is $93.07 per ton. During 2024, Illinois landfills accepted approximately 14 million tons of waste. Using this, the estimated annual statewide landfill tipping fee revenue is $1,302,980,000. Of this, privately owned landfills, as referenced in Question 4(c) (e.g., Waste Management, GFL), account for approximately $1,163,375,000 in estimated revenue and approximately 12.5 million tons of waste. County-operated landfills, as referenced in Question 4(d) (e.g., Knox County and similar governmental operators), account for approximately $161,016,684 in estimated revenue and approximately 1,730,060 tons of waste.

Board Question 5(a):

5. On page 5-6, IEPA states that a new facility or lateral expansion of an existing facility must conduct a hydrogeologic investigation that includes establishing background values for PFAS constituents.

    a. Please clarify whether establishment of background concentrations for PFAS would also include PFAS as constituents for detection monitoring at new facilities or lateral expansion.

Agency Response:

No, establishment of background values does not add PFAS as a monitored constituent to the Part 811 and 814 detection monitoring lists.

Board Question 5(b)

b. If not, comment on whether the cost impact of Part 620 PFAS standards on new landfill and lateral expansions would only be associated with establishment of background based on PFAS sample analysis cost of $300 per event per monitoring well.

Agency Response:

New landfills and those approved for expansion only have detection monitoring programs; therefore, the cost impact can only be associated with the establishment of background values for PFAS. The October 17, 2024 Opinion and Order discussed the cost impact and relied on the protocol of the applicable analytical methods which must be used when collecting PFAS samples. Costs associated with sample collection in order to mitigate potential interference, in accordance with the analytical procedures incorporated by reference, are separate from the analytical costs and may result in additional costs which will vary but would not be considered infeasible by the Agency.

Board Question 6(a):

6. On Page 6, IEPA provides an estimate of $300 per PFAS sample analysis.

   a. Please place this estimated cost in context of other required monitoring.

Agency Response:

See the table below for costs associated with common groups of parameters (i.e; volatile and semi-volatile organic compounds (VOCs and SVOCs, respectively)) analyzed at the Agency laboratory with costs included below:

Analytical Method	Cost
8270	$402.50
8260	$258.80
525	$99.80
531	$73.50
8081	$367.50
524.3-VOC	$101.60
524.3-THM	$42.70
515.4	$154.60
524.3-SOC	$52.50
8260-SIM	$258.80
548.1	$131.30

Board Question 5(b):

b. Would there be any additional associated costs, such as sample collection, sample preservation and transfer, analysis of data, or record keeping costs?

Agency Response:

The October 17, 2024, Opinion and Order discussed the cost impact and relied on

the protocol of the applicable analytical methods which must be used when collecting PFAS samples. Costs associated with sample collection in order to mitigate potential interference, in accordance with the analytical procedures incorporated by reference, are separate from the analytical costs and may result in additional costs which will vary but would not be considered infeasible by the Agency.

Board Question 5(c):

c. Is $300 analytical cost per sample comparable to the cost for analysis of other organic constituents at a landfill, or is the cost to sample for PFAS significantly higher?

Agency Response:

The costs for individual analytes or groups of analytes vary. The Agency does not consider the cost to be significantly higher than what is currently required to be monitored. Please see table above for costs associated with common groups of parameters based on analytical method.

Board Question 7:

7. On page 6 regarding Groundwater Impact Assessment (GIA) modeling, IEPA states, "modeling can be time intensive and could have a wide range of costs, which are unknown to the Agency as costs are not submitted as part of the GIA modeling documentation." Please comment on whether the cost of GIA modeling would be significantly impacted by adding constituents like PFAS.

Agency Response:

Groundwater Impact Assessment (GIA) modeling is a predictive tool required under Illinois rules (Parts 811 and 814) to demonstrate that leachate contaminants will not cause an exceedance of groundwater standards at a compliance boundary within a 100-year period. Incorporating PFAS compounds into GIA modeling is technically feasible with existing models and data, and it should not substantially increase the cost of performing the modeling analysis itself. Illinois' existing regulations already use conservative contaminant transport models for predictive assessments, and these models can accommodate PFAS compounds by inputting their known chemical properties. The process, equations, and software remain the same. Incorporating PFAS compounds into GIA models does not require a new modeling framework or fundamentally different tools as Illinois regulations already mandate the use of a contaminant transport model that meets certain scientific and calibration standards. These models are capable of handling any number of chemical species given appropriate input parameters and PFAS would be treated as any other contaminant in the leachate source term. The workflow (assembling site data, estimating leachate concentrations, running fate and transport simulations, and comparing predicted concentrations to standards) stays consistent and the modeling process and

equations remain the same.

While a GIA modeling framework is already in place, PFAS compounds have unique traits that must be represented in the model inputs. Including PFAS and representing these traits requires careful selection of input parameters, but not a change in modeling equations. PFAS compounds are persistent and do not appreciably degrade over the timeframe of interest for GIAs (within 100 years of closure of the unit). In modeling terms, this means setting the decay rate to effectively zero. Additionally, PFAS compounds are surfactants; they exhibit moderate sorption to certain soils, influenced by organic carbon content and mineral surface chemistry. Models typically handle sorption via a distribution coefficient or retardation factor, which can be input for PFAS as they are for other contaminants. Notably, sorption for PFAS compounds can be weaker than many organic contaminants (especially in low organic content soils), meaning they may travel at the advective velocity of groundwater; however, this too is handled by adjusting the distribution coefficient where a lower value implies less retardation and farther transport. The existing GIA modeling framework accounts for these PFAS characteristics.

From a modeling execution standpoint, adding PFAS compounds might add some complexity (e.g. potentially more simulation iterations, finer spatial resolution, or scenarios to test sensitivity and ensure numerical stability), but it does not upend the overall workflow or demand new computational methods. Models are capable of handling such concentrations and the GIA model framework currently accounts for the very low concentrations required to be detected as a result of the regulatory standards for PFAS compounds. Incorporating PFAS compounds into a groundwater model is not likely to multiply the cost of the modeling work itself in a significant way. The process of setting up and executing a contaminant transport model is driven in large part by the site hydrogeology (e.g. number of layers, size of domain) rather than the number of chemicals. If a contaminant transport model is already being run for other leachate constituents, adding PFAS compounds involves adding their input data and running additional simulations or model species which is a relatively modest incremental effort. Consultants might spend additional time performing sensitivity analyses for these compounds, but this is still within the normal scope of GIA modeling tasks. The labor and software costs of modeling PFAS are comparable to any other constituent – not zero, but not an order-of-magnitude change.

Fate and transport of PFAS compounds has been studied and authoritative sources provide physical-chemical properties, such as solubility and organic carbon partition coefficients. Published values indicate moderate affinity for organic carbon and together with low vapor pressure and its non-volatile nature, this informs the transport modeling. That is, PFAS compounds will predominantly remain in water and sorb somewhat to soils. Based on the numerous studies of PFAS compound sorption in various soils, there exists a knowledge base for selecting reasonable distribution coefficient inputs and these can be obtained as opposed to funding new studies. Illinois EPA anticipates that, in the absence of site-specific data, models will use intentionally conservative values (on the low end of observed ranges) to not overestimate retention in soil. An initial conservative default approach should not significantly increase modeling costs. If a GIA model using the default values predicts non-compliance, site-specific data to measure actual PFAS compound retardation in the soil at

the site can be collected. Such a study would be an extra cost; however, it's not mandated by Illinois rule and would be a voluntary effort to refine the model if needed. For PFAS compounds, one could argue the partition coefficient is a parameter that might warrant site verification (since soil organic carbon and chemistry will differ site to site), but given the added expense, a facility may simply use a conservative low distribution coefficient to avoid this cost, albeit at the risk of the model predicting failure. In summary, sufficient data exists to incorporate PFAS compounds into models without new studies, but site-specific testing remains an option for potentially mitigating conservative model results.

It is important to distinguish one-time modeling efforts from ongoing sampling and analysis costs, as laboratory and field costs are separate from modeling and will be incurred regardless of whether fate and transport simulations are conducted. In contrast, modeling costs typically consist of time and computational resources and whether adding more constituents in the model significantly increases consulting fees depends on the situation. If a GIA was already required for other constituents, adding the PFAS compounds will only be a small scope expansion (though may require a longer model runtime). The cost difference is marginal compared to analyzing water samples for PFAS compounds at groundwater monitoring wells.

In summary, adding PFAS compounds to GIA modeling by itself is not expected to significantly increase the cost of performing the modeling, as the modeling framework and tools remain the same, and data for these chemicals are readily obtainable without new research. When it is not practical to obtain site-specific data, the Agency considers use of other data for model inputs provided they are reasonably conservative and are documented. As such, the Agency does not consider incorporation of PFAS into required modeling to significantly increase costs.

Board Question 8(a):

8. Mr. Hunsberger's pre-filed testimony on behalf of Land and Lakes Company states, "Based on information received from the Illinois EPA in response to a Freedom of Information Act (FOIA) request, as of 05/22/2025, there are ninety-seven (97) Part 807 solid waste landfills in Illinois that have not completed post-closure care. Of these, thirty- four (34) are closed, but not certified closed, and sixty-three (63) are in post-closure (including Land and Lakes 1 & 2)." Hunsberger Test. at 2.

    a. Does the Agency have records regarding ownership information for the Part 807 landfills listed in Attachment A of Hunsberger's testimony?

Agency Response:

Yes.

Board Question 8(b):

b. If so, please provide a breakdown in terms of those facilities owned by private companies and those owned by municipalities, and if ownership changed during the

life of these landfills, please provide all ownership data the Agency has maintained.

Agency Response:

As discussed in response to Board Question 4.a, the Agency has records reflecting landfill ownership information for Part 807 landfills. Although the Agency maintains these records, ownership changes during the life of these landfills are not readily available.

Board Question 8(c):

c. Please clarify whether all or some of the 34 closed Part 807 landfills awaiting closure certification are still monitoring groundwater.

Agency Response:

Groundwater monitoring is required at all landfills in accordance with their respective operating permits.

Board Question 8(d):

d. If so, would they be required to monitor PFAS constituents going forward?

Agency Response:

Part 620 does not include a PFAS exemption for Part 807 landfills similar to the exemption provided for Part 811 and 814 landfills. Therefore, the PFAS constituents specified in Part 620 must be monitored annually along with all other Part 620 constituents.

Board Question 8(e):

e. If they are not monitoring groundwater, please comment on the status of the closed landfills in terms of closure certification.

Agency Response:

Not applicable; the closed landfills are required to monitor groundwater.

Board Question 8(f):

f. Please comment on whether the 63 closed Part 807 landfills conducting postclosure monitoring would be required to monitor PFAS constituents as a part of their routine quarterly/semiannual/annual groundwater monitoring.

Agency Response:

The landfills conducting post-closure groundwater monitoring are required to monitor PFAS as a part of their routine quarterly/semiannual/annual groundwater monitoring as there is no exemption provided in Part 620. All Part 620 constituents must be monitored annually in detection monitoring programs. If select wells are in assessment or corrective action monitoring, those wells may have a quarterly or semiannual frequency to monitor a release from the landfill.

Board Question 8(g):

g. Comment on whether adding PFAS constituents to monitoring list for Part 807 landfills would impact the postclosure care period.

Agency Response:

If detection(s) of PFAS are determined to be a result of a release from a Part 807 landfill, then additional monitoring will be required to determine the nature and extent of the release, and corrective action may be required, which would extend the post-closure care period.

Board Question 8(h):

h. Comment on whether all closed Part 807 landfills subject to financial assurance requirements under 35 Ill. Adm. Code 807.600 for closure and post-closure care for Part 807 landfills. If so, would the addition of PFAS sampling trigger a revision in the closure care estimate under Section 807.621, and 807.622(b)?

Agency Response:

Under Section 21.1 of the Illinois Environmental Protection Act and 35 Ill. Adm. Code 807.601(a), the State, its agencies, and units of local government are exempt from financial assurance requirements for closure and post-closure care of Part 807 landfills. Private owners would be subject to revision of financial assurance requirements. The addition of PFAS, as a Part 620 constituent to monitor and address, will require revising the post-closure care plan under 35 Ill. Adm. Code 807.622(b) and adjusting the cost estimate under 35 Ill. Adm. Code 807.621, with the updated amount reflected in the facility's financial assurance mechanism.

Board Question 8(i):

i. Considering that Part 807 landfills were closed more than 30 years ago without upgrading to comply with the requirements of Parts 814 and 811, please comment on the merits of requiring them to comply with Part 620 PFAS standards if they are not impacting any downgradient sources of drinking water, including community

water supply wells and private potable water wells.

Agency Response:

The Groundwater Protection Act protects groundwater regardless of whether it is currently being used as a source of drinking water. Further, it is a violation of the Environmental Protection Act to cause, threaten or allow the discharge of any contamination to the environment so as to cause or tend to cause water pollution, or so as to violate regulations or standards adopted by the Board (e.g., Part 620 groundwater quality standards). This is mirrored specifically with respect to landfills in 35 Ill. Adm. Code 807.313, which states "no person shall cause or allow operation of a sanitary landfill so as to cause or threaten or allow the discharge of any contaminants into the environment..." State law is aligned to protect groundwater as a resource. Without having PFAS analytical results, the Agency can neither determine whether a release has occurred nor assess whether such a release has impacted groundwater, including downgradient sources of drinking water.

Board Question 9(a):

9. Mr. Hunsberger's pre-filed testimony raises concerns of how Part 807 landfills will fund PFAS monitoring and remediation. Hunsberger Test. at 1. Mr. Hunsberger testified specifically about Land and Lakes landfill 1 & 2, but testifies generally about Part 807 landfills and monitoring, corrective action and costs associated with those landfills. *Id*. at 2.

    a. Did privately-owned Part 807 landfills generate revenue during their active life? If yes, how many such landfills in the state generated revenue and how many did not? Please provide an estimated range of revenue generated during the active life of these landfills.

Agency Response:

Yes, it is the Agency's understanding revenue was generated until the time of closure. The Agency does not have the requested revenue information.

Board Question 9(b):

    b. Did municipally-owned Part 807 landfills generate revenue during their active life? If yes, how many such landfills in the state generated revenue and how many did not? Please provide an estimated range of revenue generated during the active life of these landfills.

Agency Response:

Yes, it is the Agency's understanding revenue was generated until the time of closure. The Agency does not have the requested revenue information.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Trevor D. Dell'Aquila
Trevor D. Dell'Aquila
Assistant Counsel
Division of Legal Counsel

DATED: August 11, 2025

115 South LaSalle Street
Suite 2203
Chicago, Illinois 60603
312-832-0025
trevor.dellaquila@illinois.gov

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CERTIFICATE OF SERVICE

I, the undersigned, an attorney, state the following:

I have served the attached Illinois Environmental Protection Agency's Responses to Illinois Pollution Control Board's August 6, 2025 Order upon the following:

See attached Service List

I affirm that my e-mail address is trevor.dellaquila@illinois.gov; the number of pages in the e-mail transmission is 18; and the e-mail transmission took place before 5:00 p.m. on August 11, 2025.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Trevor D. Dell'Aquila
Trevor D. Dell'Aquila
Assistant Counsel
Division of Legal Counsel

DATED: August 11, 2025

115 South LaSalle Street
Suite 2203
Chicago, Illinois 60603
312-832-0025
trevor.dellaquila@illinois.gov

SERVICE LIST

Illinois Pollution Control Board Mr. Don A. Brown, Clerk of the Board Vanessa Horton, Hearing Officer Chloe Salk, Hearing Officer 60 E. Van Buren Street Suite 630 Chicago, Illinois 60605 don.brown@illinois.gov Vanessa.Horton@illinois.gov Chloe.Salk@illinois.gov	**Metropolitan Water Reclamation District of Greater Chicago** Jorge T. Mihalopoulos Susan T. Morakalis J. Mark Powell Metropolitan Water Reclamation District of Greater Chicago 100 E. Erie Street Chicago, Illinois 60611 Jorge.mihalopoulos@mwrd.org morakaliss@mwrd.org PowellJ@mwrd.org
Barnes & Thornburg Fredric P. Andes Ian Surdell 1 North Wacker Drive, Suite 4400 Chicago, Illinois 60606 Fandes@btlaw.com Ian.surdell@btlaw.com	**Brown, Hay & Stephens LLP** Scott B. Sievers Lauren C. Lurkins Claire D. Meyer 205 South Fifth Street, Suite 700 Springfield, Illinois 62705 ssievers@bhslaw.com llurkins@bhslaw.com cmeyer@bhslaw.com
Beveridge & Diamond, PC Nessa Coppinger Daniel Schulson 1900 N. St. NW Washington DC 20036 ncoppinger@bdlaw.com dschulson@bdlaw.com	**Office of the Illinois Attorney General** Ellen F. O'Laughlin – Senior Assistant Attorney General Jason James – Assistant Attorney General 69 West Washington Street Suite 1800 Chicago, Illinois 60602 Ellen.olaughlin@ilag.gov Jason.james@ilag.gov Jason.james@ilag.gov
Illinois Department of Natural Resources Renee Snow – General Counsel One Natural Resources Way Springfield, IL 62702-1271 Renee.snow@illinois.gov	**International Molybdenum Association** Sandra Carey- HSE Executive 454-458 Chiswick High Road London, W4 5TT, United Kingdom sandracarey@imoa.info
ArentFox Schiff LLP Joshua R. More Bina Joshi Daniel J. Deeb Sarah L. Lode Alex Garel-Frantzen 233 South Wacker Drive Suite 6600 Chicago, IL 60606 Joshua.more@afslaw.com Bina.joshi@afslaw.com Dan.deeb@afslaw.com Sarah.lode@afslaw.com Alex.garel-frantzen@afslaw.com	**Sorling Northrup** James M. Morphew 1 North Old State Capital Plaza, Suite 200 P.O. Box 5131 Springfield, IL 62705 jmmorphew@sorlinglaw.com

American Chemistry Council Aleacia Chinkhota Rob Simon 700 2nd Street, NE Washington DC 20002 Aleacia_chinkhota@americanchemistry.com Rob_simon@americanchemistry.com	**Illinois Environmental Regulatory Group** Trejahn Hunter 215 East Adams Street Springfield, IL 62701 thunter@ierg.org
Barnes & Thornburg LLP Jennifer Baker 11 South Meridian St Indianapolis, IN 46024 jbaker@btlaw.com	**Illinois Environmental Protection Agency** Sara Terranova – Assistant Counsel Nick M. San Diego – Deputy General Counsel Kaitlyn Hutchison – Assistant Counsel 2520 W. lles Ave P.O. Box 19276 Springfield, IL 62794 Sara.terranova@illinois.gov Nick.m.sandiego@illinois.gov Kaitlyn.hutchison@illinois.gov
Joint Committee on Administrative Rules Kim Schultz – Executive Director Wm. G. Stratton Office Building 401 S Spring St Room 700 Springfield, Illinois 62706 kimberlyS@ilga.gov	