

ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
PROPOSED AMENDMENTS TO)	R01-26
REGULATION OF PETROLEUM)	(Rulemaking – Land)
LEAKING UNDERGROUND STORAGE)	
TANKS (35 ILL. ADM. CODE 742))	

TESTIMONY OF KENDRA BROCKAMP IN SUPPORT OF
THE ENVIRONMENTAL PROTECTION AGENCY'S MOTION TO AMEND
ITS PROPOSAL TO AMEND 35 ILL. ADM. CODE 732

My name is Kendra Brockamp. I am a Unit Manager in the Leaking Underground Storage Tank Section within the Bureau of Land of the Illinois Environmental Protection Agency. I have been in my current position since November 1998. Prior to assuming my current position, I was a project manager in the Leaking Underground Storage Tank Section beginning in 1991. I received a B.S. in Biology in 1989 from the University of Illinois at Urbana-Champaign. My resume is attached. Today, I will be testifying in support of the Motion to Amend 35 Ill. Adm. Code Part 732.

Subsection 732.307(c)(3)(A): Site Evaluation

This subsection has been amended to delete a specific requirement when performing in-situ hydraulic conductivity testing. The Agency is proposing to delete the requirement that the well screen must be contained within the saturated zone. The Agency requires that wells installed for the purpose of contaminant sampling be screened such that the water table intersects the screen. Therefore, wells screened within the saturated zone could be used exclusively for hydraulic conductivity testing and the hydraulic conductivity well could not be used for contaminant sampling. When owner/operators conduct hydraulic conductivity testing for purposes other than site classification, the Agency has

not required the screen to be contained within the saturated zone. It is the Agency's belief that the cost involved in drilling the extra well is not necessarily worth the benefit an owner/operator would receive from having the screen contained within the saturated zone. The data obtained from a well where the screen straddles the water table would result in a hydraulic conductivity value whereby the Agency would require more protection of the aquifer than may be necessary. If the owner/operator desires to install a well specifically for hydraulic conductivity where the screen is contained within the saturated zone to obtain a more accurate hydraulic conductivity, the Agency would allow that.

Subsection 732.312(c): Classification by Exposure Pathway Exclusion

Subsection (c) has been amended to exclude the requirement of physical soil classification as part of the requirements for a site classification plan under this exposure pathway exclusion method of site classification. "Physical soil classification" is defined in Section 732.103 as "verification of geological conditions consistent with regulation for identifying and protecting potable resource groundwater or *verification that subsurface strata are as generally mapped in the publication Illinois Geological Survey Circular (1984) entitled "Potential For Contamination Of Shallow Aquifers in Illinois," by Berg, Richard C., et al. Such classification may include review of soil borings, well logs, physical soil analysis, regional geologic maps, or other scientific publications.* (Section 57.2 of the Act)"

Exposure pathway exclusion is independent of the Berg Circular. The Berg circular relates only to Method 1 for site classification. While the Agency expects an owner/operator to gather any soil and groundwater data necessary to conduct pathway exclusion, this does not necessarily have to be done to the degree that is required to

determine consistency with the Berg Circular. Under subsection (c)(2), the Agency is proposing to add that data shall be collected demonstrating the physical characteristics of soil and groundwater in lieu of the requirement for physical soil classification. This would enable the owner/operator to collect the data necessary to determine if any exposure pathways can be excluded.

Subsection 732.601(b)(2) and (c): Applications for Payment

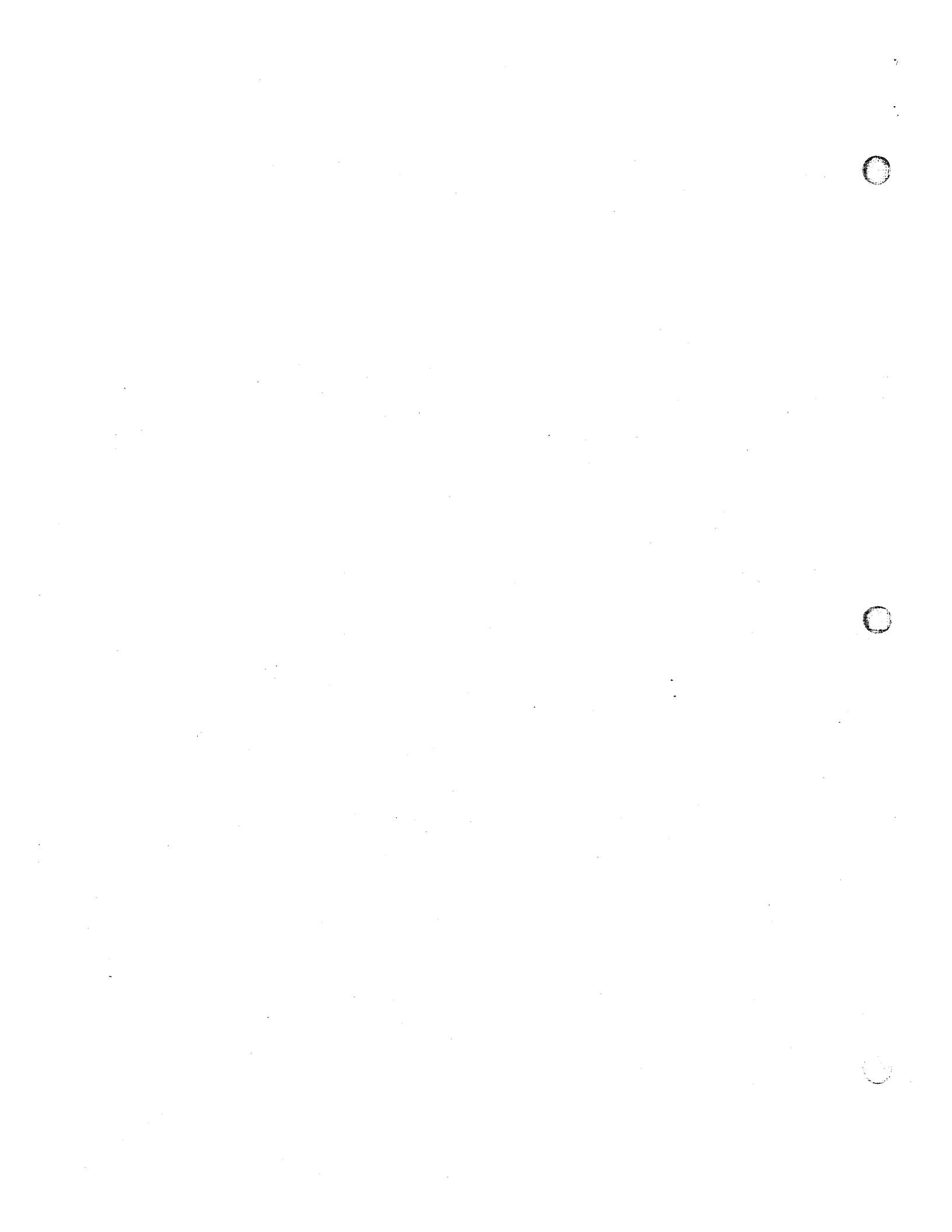
Subsection (b)(2) amends “amount” to read “amounts”. When the Illinois EPA compares the approved budget with the application for payment, there are six line items or “amounts” rather than one total budget “amount” that are reviewed for comparison between the budget and billing package: investigation costs; analysis costs; personnel costs; equipment costs, field purchases and other costs; and handling charges.

Subsection 732.606(i) and (nn): Ineligible Costs

Subsection (i) has been amended to include that costs associated with activities that violate Office of the State Fire Marshal (OSFM) regulations would be ineligible. This is a clarification, in that removal or abandonment of an Underground Storage Tank must be carried out in accordance with OSFM regulations, pursuant to Section 57.5(b) of the Act.

Subsection (nn) has been added to include costs for standby and demurrage as ineligible for the Fund. Demurrage or standby is typically charged when trucks are waiting at the site to be loaded with soil for the landfill or when they are waiting to pump out contaminated water from the excavation. This waiting time is not corrective action.

THIS FILING IS SUBMITTED ON RECYCLED PAPER



Kendra N. Brockamp

1021 North Grand Avenue East ■ Springfield, Illinois 62794-9276 ■ 217/785-3913

Education

UNIVERSITY OF ILLINOIS AT URBANA-CHAMPAIGN
B.S. in Biology--May 1989

Employment

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Senior Public Service Administrator 11/98 to current

Unit Manager in the Leaking Underground Storage Tank (LUST) Section
Manage and direct the activities of the Unit which includes seven project managers

- prepare work schedules and assign work
- perform annual performance evaluations
- provide training and technical guidance to staff
- facilitate problem solving
- coordinate the LUST Section portion of the Performance Partnership with USEPA
- respond to subjects of highly controversial or sensitive nature
- make presentations at Brownfield Conferences and other Illinois EPA related functions

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Environmental Protection Specialist 05/91 to 10/98

Project Manager in the LUST Section

- Review and provide comments on technical plans and reports for leaking underground storage tank remediation
- Review and provide comments on budgets
- Review and provide comments on reimbursement packages submitted for the leaking underground storage tank Fund
- Provide testimony at appeals and regulatory hearings before the Illinois Pollution Control Board
- Assist in the preparation of enforcement cases

Additional Training

- Technical: Basical Geology and Hydrogeology; Aquifer Testing; Groundwater Chemistry and Sampling; Hydrogeologic Mapping; Risk Assessment at Superfund Sites;
- Computer: Word Perfect; Word; Power Point; Quattro Pro
- Management/Problem Solving: Effective Management; Expert Witness; Maintaining an Optimistic Focus at Work; Testifying Workshop; Total Quality Managment Facilitator Training

