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**MAY 10 2004**

**BEFORE THE POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS**

**STATE OF ILLINOIS  
Pollution Control Board**

BROCK OIL COMPANY, )  
Petitioner, )  
v. )  
ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
Respondent. )

PCB No. 04- **191**  
(LUST Appeal – Ninety Day Extension)

**NOTICE**

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

Corey Eversgerd, Project Manager  
United Science Industries  
P.O. Box 360  
6295 East Illinois Highway 15  
Woodlawn, IL 62898-0360

PLEASE TAKE NOTICE that I have today filed with the office of the Clerk of the Pollution Control Board a REQUEST FOR NINETY DAY EXTENSION OF APPEAL PERIOD, copies of which are herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,  
Respondent



John F. Kim  
Assistant Counsel  
Special Assistant Attorney General  
Division of Legal Counsel  
1021 North Grand Avenue, East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
217/782-5544  
217/782-9143 (TDD)  
Dated: May 6, 2004

MAY 10 2004

STATE OF ILLINOIS  
Pollution Control Board

**BEFORE THE POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS**

BROCK OIL COMPANY,	)	
Petitioner,	)	
v.	)	PCB No. 04- 197
ILLINOIS ENVIRONMENTAL	)	(LUST Appeal – Ninety Day Extension)
PROTECTION AGENCY,	)	
Respondent.	)	

**REQUEST FOR NINETY DAY EXTENSION**  
**OF APPEAL PERIOD**

NOW COMES the Respondent, the Illinois Environmental Protection Agency ("Illinois EPA"), by one of its attorneys, John J. Kim, Assistant Counsel and Special Assistant Attorney General, and, pursuant to Section 40(a)(1) of the Illinois Environmental Protection Act (415 ILCS 5/40(a)(1)) and 35 Ill. Adm. Code 105.208, hereby requests that the Illinois Pollution Control Board ("Board") grant an extension of the thirty-five (35) day period for petitioning for a hearing to August 4, 2004, or any other date not more than a total of one hundred twenty-five (125) days from April 1, 2004, the date of service of the Illinois EPA's final decision. In support thereof, the Illinois EPA respectfully states as follows:

1. On March 31, 2004, the Illinois EPA issued a final decision to the Petitioner.  
(Exhibit A)


2. On April 26, 2004, the Petitioner made a written request to the Illinois EPA for an extension of time by which to file a petition for review, asking the Illinois EPA join in requesting that the Board extend the thirty-five day period for filing a petition to ninety days. The Petitioner represented that the final decision was received on April 1, 2004. (Exhibit B)

3. The additional time requested by the parties may eliminate the need for a hearing in this matter or, in the alternative, allow the parties to identify issues and limit the scope of any hearing that may be necessary to resolve this matter.

WHEREFORE, for the reasons stated above, the parties request that the Board, in the interest of administrative and judicial economy, grant this request for a ninety-day extension of the thirty-five day period for petitioning for a hearing.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,  
Respondent

  
\_\_\_\_\_  
John J. Kim  
Assistant Counsel  
Special Assistant Attorney General  
Division of Legal Counsel  
1021 North Grand Avenue, East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
217/782-5544  
217/782-9143 (TDD)  
Dated: May 6, 2004

This filing submitted on recycled paper.



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. Box 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397  
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

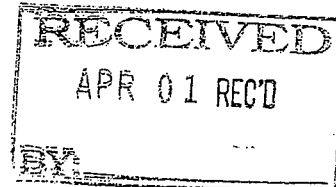
217/782-6762

**CERTIFIED MAIL**

7002 3150 0000 1255 8959

**MAR 31 2004**

Brock Oil Company  
Attn: Jeff Brock  
601 North Clinton Street  
Bloomington, Il 61701



Re: LPC #1130205274 -- McClean County  
Bloomington/Brock Oil Company  
601 North Clinton Street  
LUST Incident No. 20000434  
LUST Technical File

Dear Mr. Brock:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the High Priority Site Investigation Corrective Action Plan (plan) submitted for the above-referenced incident. This information, dated January 20, 2004, was received by the Illinois EPA on January 22, 2004. Citations in this letter are from the Environmental Protection Act (Act) and 35 Illinois Administrative Code (35 Ill. Adm. Code).

Pursuant to Section 57.7(c)(4) of the Act and 35 Ill. Adm. Code 732.405(c), the plan is modified. The modifications listed below are necessary, in addition to those provisions already outlined in the plan, to demonstrate compliance with Title XVI of the Act and 35 Ill. Adm. Code 732. Please note that the activities proposed in the plan are for investigative purposes only. Final approval for corrective action activities is contingent upon the submittal of a High Priority Corrective Action Plan that documents the results of the proposed investigation and satisfies the requirements set forth in Section 57.7(c)(1) of the Act and 35 Ill. Adm. Code 732.404. The required modification(s) is/are as follows:

1. One (1) additional soil boring may be required to conform to the IEPA guidelines of five (5) soil and five (5) groundwater samples within the plume. A copy of the Feasibility and Design Determination for Bioremediation has been provided as an attachment.
2. If the High Priority Plan proposes to remediate soil contamination that is not in the saturated zone, then please provide information on how the permeox will:

ROCKFORD - 4302 North Main Street, Rockford, IL 61103 - (815) 966-1000  
ELGIN - 595 South State, Elgin, IL 60123 - (847) 608-3300  
BUREAU OF LAND - PEORIA - 7620 N. University St., Peoria, IL 61614 - (309) 693-5463  
SPRINGFIELD - 4500 S. Sixth Street Rd., Springfield, IL 62706 - (217) 782-3397  
MARION - 2309 W. Main Street, Marion, IL 62959 - (217) 993-7200

**EXHIBIT**

A

W. Harrison St., Des Plaines, IL 60016 - (847) 294-4000  
University St., Peoria, IL 61614 - (309) 693-5463  
25 South First Street, Champaign, IL 61820 - (217) 278-5800  
109 Mall Street, Collinsville, IL 62234 - (618) 346-5120  
(618) 993-7200

- a. Remain moist in the unsaturated zone. The concern is that the Permeox will dry out and not fully react in the unsaturated zone due to loss of moisture.
- b. How the Permeox will be transported/distributed in the unsaturated contaminated soil zone. The concern is that pockets and or incomplete dispersion of permeox may be possible in the unsaturated zone.

In addition, the budget for the High Priority Site Investigation Corrective Action Plan is modified pursuant to Section 57.7(c)(4) of the Act and 35 Ill. Adm. Code 732.405(c). Based on the modifications listed in Section 2 of Attachment A, the amounts listed in Section 1 of Attachment A are approved. Please note that the costs must be incurred in accordance with the approved plan. Be aware that the amount of reimbursement may be limited by Sections 57.8(e), 57.8(g) and 57.8(d) of the Act, as well as 35 Ill. Adm. Code 732.604, 732.606(s), and 732.611.

Please note that, if the owner or operator agrees with the Illinois EPA's modifications, submittal of an amended plan and/or budget, if applicable, is not required (Section 57.7(c)(4) of the Act and 35 Ill. Adm. Code 732.503(f)). Additionally, pursuant to Section 57.8(a)(5) of the Act and 35 Ill. Adm. Code 732.405(e), if reimbursement will be sought for any additional costs that may be incurred as a result of the Illinois EPA's modifications, an amended budget must be submitted.

NOTE: Amended plans and/or budgets must be submitted and approved prior to the issuance of a No Further Remediation (NFR) Letter. Costs associated with a plan or budget that have not been approved prior to the issuance of an NFR Letter will not be reimbursable.

Pursuant to 35 Ill. Adm. Code 732.401, the site investigation results and a High Priority Corrective Action Plan demonstrating compliance with the requirements set forth in Section 57.7(c)(1) of the Act and 35 Ill. Adm. Code 732.404 must be submitted within 90 days of the date of this letter to:

Illinois Environmental Protection Agency  
Bureau of Land - #24  
Leaking Underground Storage Tank Section  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, IL 62794-9276

Please submit all correspondence in duplicate and include the Re: block shown at the beginning of this letter.

An underground storage tank system owner or operator may appeal this decision to the Illinois Pollution Control Board. Appeal rights are attached.

Page 3

If you have any questions or need further assistance, please contact Wayne Zuehlke at 217/557-6937.

Sincerely,

*Clifford L. Wheeler*

Clifford L. Wheeler  
Unit Manager  
Leaking Underground Storage Tank Section  
Division of Remediation Management  
Bureau of Land

CLW:WZ\20000434IHPCAPMOD.doc

Attachment: Attachment A  
Feasibility and Design Determination for Bioremediation  
Appeal Right

cc: USI, Inc.  
Division File

## Attachment A

Re: LPC #1130205274 -- McClean County  
Bloomington/Brock Oil Company  
601 North Clinton Street  
LUST Incident No. 20000434  
LUST Technical File

Citations in this attachment are from the Environmental Protection Act (Act) and 35 Illinois Administrative Code (35 Ill. Adm. Code).

### SECTION 1

As a result of the Illinois EPA's modification(s) in Section 2 of this Attachment A, the following amounts are approved:

\$3,019.60	Investigation Costs
\$2,817.00	Analysis Costs
\$4,120.00	Personnel Costs
\$620.00	Equipment Costs
\$3,359.50	Field Purchases and Other Costs
\$26.64	Handling Charges

### SECTION 2

1. \$1,355.00 for an adjustment in Investigative Costs Costs. The Illinois EPA has determined that these costs are not reasonable as submitted (Section 57.7(c)(4)(C) of the Act and 35 Ill. Adm. Code 732.606(hh)). One of the overall goals of the financial review is to assure that costs associated with materials, activities, and services are reasonable (35 Ill. Adm. Code 732.505(c)). Please note that additional information and/or supporting documentation may be provided to demonstrate the costs are reasonable.
  - A. \$750.00 in Mobilization Charges. The one-day rate includes mobilization charges.
  - B. \$600.00 in Geoprobe Drilling Costs.
  - C. \$ 5.00 in Disposable Bailer Costs.
2. \$1,280.00 for an adjustment in Investigative Costs. These costs are inconsistent with the associated technical plan. One of the overall goals of the financial review is to assure that costs associated with materials, activities, and services shall be consistent with the associated technical plan (35 Ill. Adm. Code 732.505(c)).
  - A. \$ 280.00 in 55 Gallon Drum Costs. These costs are associated with Site Classification and are not considered part of Corrective Action.
  - B. \$1000.00 in Disposal Costs. These costs are associated with Site Classification and are not considered part of Corrective Action.

3. \$831.00 for an adjustment in Analytical Costs. The Illinois EPA has determined that these costs are not reasonable as submitted (Section 57.7(c)(4)(C) of the Act and 35 Ill. Adm. Code 732.606(hh)). One of the overall goals of the financial review is to assure that costs associated with materials, activities, and services are reasonable (35 Ill. Adm. Code 732.505(c)). Please note that additional information and/or supporting documentation may be provided to demonstrate the costs are reasonable.
- A. \$ 60.00 in TPH Costs. The Agency considers these costs excessive.
  - B. \$135.00.00 in BOD Costs. The Agency considers these costs excessive. Samples are not required (Please refer to Feasibility and Design Determination for Bioremediation).
  - C. \$ 40.00 in COD Costs. The Agency considers these costs excessive.
  - D. \$ 66.00 in pH Costs. The Agency considers these costs excessive. Only one (1) sample is required (Please refer to Feasibility and Design Determination for Bioremediation).
  - E. \$ 90.00 in Microbe Plate Count Costs. The Agency considers these costs excessive. Only one (1) sample is required (Please refer to Feasibility and Design Determination for Bioremediation).
  - F. \$ 16.00 in Metal Prep Costs. The Agency considers these costs excessive.
  - G. \$ 45.00 in TPH Costs. The Agency considers these costs excessive.
  - H. \$ 30.00 in COD Costs. The Agency considers these costs excessive.
  - I. \$ 6.00 in Paint Filter Costs. The Agency considers these costs excessive.
  - J. \$ 2.00 in Flash Point Costs. The Agency considers these costs excessive.
  - K. \$ 60.00 in BOD Costs. The Agency considers these costs excessive. Samples are not required (Please refer to Feasibility and Design Determination for Bioremediation).
  - L. \$106.00.00.00 in pH Costs. The Agency considers these costs excessive. Only one (1) sample is required (Please refer to Feasibility and Design Determination for Bioremediation).
  - M. \$175.00 in Microbe Plate Count Costs. The Agency considers these costs excessive. Only one (1) sample is required (Please refer to Feasibility and Design Determination for Bioremediation).

4. \$15,521.00 for an adjustment in Personnel Costs. The Illinois EPA has determined that these costs are not reasonable as submitted (Section 57.7(c)(4)(C) of the Act and 35 Ill. Adm. Code 732.606(hh)). One of the overall goals of the financial review is to assure that costs associated with materials, activities, and services are reasonable (35 Ill. Adm. Code 732.505(c)). Please note that additional information and/or supporting documentation may be provided to demonstrate the costs are reasonable.

- A. The Agency has reviewed the activities to be completed as part of the plan and approved a reasonable amount of personnel dollars for this effort.

We do not specify number of hours or type of personnel expected to complete the proposed activities, only a reasonable total amount. How a consultant chooses to use this amount (type of personnel used and number of hours) is up to them as



long as the approved total amount is not exceeded and the personnel rates are reasonable.

5. \$130.00 for an adjustment in Equipment Costs. The Illinois EPA has determined that these costs are not reasonable as submitted (Section 57.7(c)(4)(C) of the Act and 35 Ill. Adm. Code 732.606(hh)). One of the overall goals of the financial review is to assure that costs associated with materials, activities, and services are reasonable (35 Ill. Adm. Code 732.505(c)). Please note that additional information and/or supporting documentation may be provided to demonstrate the costs are reasonable.

- A. \$ 20.00 in PID Costs. The Agency considers these costs excessive.
- B. \$ 50.00 in Pump Costs. The Agency considers these costs excessive.
- C. \$ 60.00 in Vehicle Costs. The Agency has reduced vehicle usage by one (1) day.

6. \$1125.00 for an adjustment in Field Equipment and Other Costs. The Illinois EPA has determined that these costs are not reasonable as submitted (Section 57.7(c)(4)(C) of the Act and 35 Ill. Adm. Code 732.606(hh)). One of the overall goals of the financial review is to assure that costs associated with materials, activities, and services are reasonable (35 Ill. Adm. Code 732.505(c)). Please note that additional information and/or supporting documentation may be provided to demonstrate the costs are reasonable.

- A. \$ 105.00 in Color Copies. Considered excessive by the Agency.
- B. \$1020.00 in Treatability Study Costs. Costs associated in personnel are considered part of the Treatability Study.

## Feasibility and Design Determination for Bioremediation

### Purpose:

This document is designed to aid in the review of sites proposing bioremediation as a means of corrective action. Each feasibility and design criteria must be considered in the design of a corrective action plan proposing bioremediation.

### General Applicability

#### Contaminant Plume:

Soil and groundwater contaminant plume should be completely defined.

#### Free Product:

No Free Product should be present in area to be remediated.

#### Hydraulic Conductivity:

Should be greater than  $1 \times 10^{-7}$ . All contaminated saturated zones must be tested.

#### pH of groundwater:

Should be between 6.0 and 8.0. Tested from upper foot of groundwater, within area of highest impact.

#### Total Microbial Plate Count:

Soil sample must be taken at or below the groundwater surface, located in an area of little or no impact. Results should be greater than 1,000 CFU (colony forming units).

#### Soil Porosity:

One sample taken from the contaminated zone. This will be used in designing of the remediation system.

#### Heavy Metals:

Heavy metals should be tested at the groundwater surface. These results should be below 10mg/l for iron; 20 mg/l for copper; 20 mg/l for zinc, 900 mg/l for lead. Additionally, total heavy metals should not exceed 2500 mg/l.

#### Oxygen Demand:

For contaminant plumes of ½ acre or less, five borings should be completed and groundwater and soil samples collected. One boring should be located at the highest gradient of the plume, one from lowest gradient, and three across the center of the plume. These samples should be tested for Total Petroleum Hydrocarbon, Chemical Oxygen Demand, and Heavy Metals.

Contaminant plumes larger than 1/2 acre should add one more boring (one soil and one groundwater sample) per additional ½ acre.

## Design Considerations

### Determine mass of contaminants:

The mass of contaminants (measured by the higher amount of Total Petroleum Hydrocarbons (TPH) or Chemical Oxygen Demand (COD)) to be treated must be determined in both soil and groundwater. Sampling will determine the concentration of contaminants present in the soil and groundwater. To estimate the total amount of oxygen required to remediate the contaminants, the following example can be followed:

Assume average concentration (TPH or COD) = 10 ppm

Assume volume of contaminated mass (size of plume) in cubic yards = 1,000 (cy)

A cubic yard of clay (saturated) weighs  $118 \text{ #/ft}^3 = 3200\text{#}$

A cubic yard of sand (saturated) weighs  $124 \text{ #/ft}^3 = 3350\text{#}$

The total mass of contaminants requiring treatment (clay):

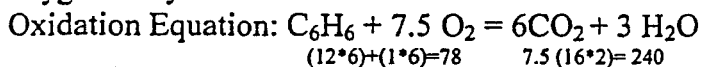
$$10/(1 \times 10^6) \times 3200 \text{ #/cy} \times 1000 \text{ cy} = 32 \text{ #'s}$$

$$(10 \text{ ppm} = 10/(1 \times 10^6))$$

### Estimate of oxygen requirement:

Based on the extent of contamination and total mass of contaminants, the required oxygen demand can be calculated. COD or TPH need to be considered in order to determine the total amount of oxygen required for degradation of contaminants.

As a rule of thumb, 3 lbs of oxygen are required per lb of hydrocarbon to be remediated. Benzene can be used as an example to determine the mass ratio of oxygen to hydrocarbon.



$$(12 \times 6) + (1 \times 6) = 78 \quad 7.5 (16 \times 2) = 240$$

If benzene were the only contaminant present it would take 240 lbs of oxygen to completely degrade 78 lbs of benzene. Meaning 3 lbs ( $240/78 = 3.08$ ) of oxygen are required to completely degrade each lb of benzene. For a leaking UST site we must consider all contaminants that will use oxygen in calculating the oxygen requirement.

Example:

Total mass of contaminants from above = 32 lb

Required Oxygen =  $32 \text{ lb} \times 3 \text{ #/#} = 96 \text{ lb}$ .

If you assume the oxygen delivery product provides 10 % by weight it is capable of delivering .1 #'s of oxygen, therefore:

Oxygen release capability = 10%

Required chemicals = 960#

The manufacturer's information regarding oxygen release capabilities should be followed in calculating required chemicals. A factor of safety of 20 to 30% of the calculated volume of material required will be allowed.

#### Layout of injection wells:

Determining the location and number of injection wells required for a one time application is a critical factor in the designing of in-situ bioremediation. The design considerations are based on a one-time injection of oxygen. Injection wells galleries should be located to provide distribution of the electron acceptor and nutrients throughout the area targeted for remediation. Amounts of material injected at each location should be based in the estimated contaminant levels to be remediated.

Determining the area of influence is a key parameter for proper distribution of the product into the ground. Injection pressure, hydraulic conductivity (K), hydraulic gradient (i) and porosity (n) are important elements to calculate an approximate area of influence. Darcy's law can be used to estimate the area of influence. The injection pressure used will drastically change the hydraulic gradient in the vicinity of the injection point. Assuming the length ( $\Delta l$ ) is half of the radius of influence you should use the injection pressure (psi) and estimate of the radius of influence to determine if the amount of time to achieve this radius of influence makes sense. An example follows:

$v = K \Delta h / \Delta l$ , where  $v$  = Darcy Velocity

$v_a = Ki/n$ , where,  $v_a$  = Interstitial Velocity, (ft/sec)

$K$  = Hydraulic Conductivity, (ft/sec)

$i$  = Hydraulic Gradient,  $dh/dl$  (ft/ft)

$n$  = Porosity of Aquifer Material, (%)

Generally, the products are injected into the ground with a pressure ranging from 250 to 2500 psi. To simplify the calculations, several assumptions are made to calculate the area of influence and interstitial velocity. Assuming a pressure of 1500 psi, an approximate area of influence 4 feet, and  $K = 1 \times 10^{-4}$  cm/sec.

$$v_a = Ki/n$$

$$= 3.28 \times 10^{-6} \text{ ft/sec} \times 3846$$

$$= 0.0126 \text{ ft/sec}$$

$$= 0.75 \text{ ft/min}$$

$$K = 1 \times 10^{-4} \text{ cm/sec} = 3.28 \times 10^{-6} \text{ ft/sec}$$

$$\Delta h = (1500 \text{ lb/in}^2 \times 144 \text{ in}^2/\text{ft}^2) / (62.4 \text{ lb/ft}^3) = 3462 \text{ ft.}$$

$$\Delta l = 2 \text{ ft. (half of the design influence)}$$

$$i = \Delta h / \Delta l = 3462 \text{ ft} / 2 \text{ ft} = 1731 \text{ ft/ft}$$

$$n = 45\% \text{ (assumed)}$$

$$i/n = 1731 / 0.45 = 3846$$

Based on the assumptions, it is revealed that 4 feet ( $0.75 \text{ ft/min.} * 5 \text{ min.} = 3.75 \approx 4 \text{ feet}$ ) of radius of influence can be achieved in 5 minutes with an injection pressure of 1500 psi. You should then consider whether it is reasonable to expect the design pressure (psi) to be applied for the required time (5 minutes) at each injection point. You can decrease the time required by increasing the injection pressure and/or reducing the design radius of influence.

Location of the injection points should maximize the area of influence from each injection point (i.e., offset or staggered centers).

**Monitoring:**

One round of groundwater samples should be collected and analyzed for all contaminants of concern and TPH and COD prior (within one month) to injection of oxygenating compounds. Six months after injection another round of groundwater sampling should be performed and results evaluated to determine the effectiveness of the oxygenating compound. This information should be compiled in a status report and submitted to the Agency

**Closure:**

Sampling of the soil and groundwater should show compliance with the applicable 742 criteria.

## Appeal Rights

An underground storage tank owner or operator may appeal this final decision to the Illinois Pollution Control Board pursuant to Sections 40 and 57.7(c)(4)(D) of the Act by filing a petition for a hearing within 35 days after the date of issuance of the final decision. However, the 35-day period may be extended for a period of time not to exceed 90 days by written notice from the owner or operator and the Illinois EPA within the initial 35-day appeal period. If the owner or operator wishes to receive a 90-day extension, a written request that includes a statement of the date the final decision was received, along with a copy of this decision, must be sent to the Illinois EPA as soon as possible.

For information regarding the filing of an appeal, please contact:

Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
State of Illinois Center  
100 West Randolph, Suite 11-500  
Chicago, IL 60601  
312/814-3620

For information regarding the filing of an extension, please contact:

Illinois Environmental Protection Agency  
Division of Legal Counsel  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, IL 62794-9276  
217/782-5544



P.O. Box 360  
6295 East Illinois Highway 15  
Woodlawn, Illinois 62898-0360

Phone: (618) 735-2411  
Fax: (618) 735-2907  
E-Mail: [unitedscience@unitedscience.com](mailto:unitedscience@unitedscience.com)

April 26, 2004

Illinois Environmental Protection Agency  
Division of Legal Counsel  
Attn: John Kim  
1021 North Grand Avenue East  
Springfield, IL 62792-9276

**RECEIVED**  
Division of Legal Counsel

APR 27 2004

Environmental Protection  
Agency

Re: **LPC# 1130205274--McLean Co.  
Bloomington/Brock Oil Company  
601 North Clinton Street  
LUST Incident No. 20000434**

Dear Mr. Kim,

United Science Industries, Inc. (USI), on behalf of our client, Brock Oil Company, is requesting a 90-day extension to the 35-day appeal period in regards to the IEPA correspondence included.

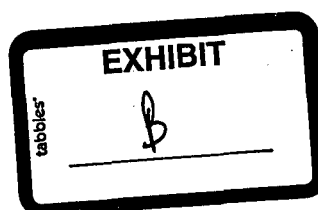
I appreciate your time and consideration in this matter. If you have any questions or comments regarding this matter please contact me at (618) 735-2411.

Sincerely yours,

UNITED SCIENCE INDUSTRIES, INC.

Corey Eversgerd  
Project Manager

Enclosures



### CERTIFICATE OF SERVICE

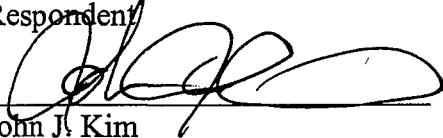
I, the undersigned attorney at law, hereby certify that on May 6, 2004, I served true and correct copies of a REQUEST FOR NINETY DAY EXTENSION OF APPEAL PERIOD, by placing true and correct copies in properly sealed and addressed envelopes and by depositing said sealed envelopes in a U.S. mail drop box located within Springfield, Illinois, with sufficient First Class Mail postage affixed thereto, upon the following named persons:

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

Corey Eversgerd, Project Manager  
United Science Industries  
P.O. Box 360  
6295 East Illinois Highway 15  
Woodlawn, IL 62898-0360

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,

Respondent



John J. Kim  
Assistant Counsel  
Special Assistant Attorney General  
Division of Legal Counsel  
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