

ILLINOIS POLLUTION CONTROL BOARD  
March 1, 1990

IN THE MATTER OF: )  
 )  
UST UPDATE. USEPA REGULATIONS ) R89-10  
(10/27/88 through 6/30/89) ) (Rulemaking)

FINAL ORDER. ADOPTED RULES

OPINION AND ORDER OF THE BOARD (by J. Anderson):

Pursuant to Section 22.4(d) of the Environmental Protection Act (Act), the Board is amending the UST underground storage tank regulations in 35 Ill. Adm. Code 731.

Section 22.4 of the Act governs adoption of regulations establishing the RCRA/UST program in Illinois. Section 22.4(d) provides for quick adoption of regulations which are "identical in substance" to federal regulations. Section 22.4(d) provides that Title VII of the Act and Section 5 of the Administrative Procedure Act (APA) shall not apply. Because this rulemaking is not subject to Section 5 of the APA, it is not subject to first notice or to second notice review by the Joint Committee on Administrative Rules (JCAR). The federal UST rules are found at 40 CFR 280. This rulemaking updates Illinois' UST rules to correspond with the following USEPA actions, through June 30, 1989.

53 Fed. Reg. 44976 November 7, 1988  
53 Fed. Reg. 51274 December 21, 1988  
54 Fed. Reg. 5452 February 3, 1989

On January 11, 1990, the Board entered an "extension of time" Order pursuant to Section 7.2(b) of the Act (Ill. Rev. Stat. 1988 Supp., ch. 111 1/2, par. 1007.2(b)). The Order noted that all of the amendments involved in this Docket are corrections which should have been addressed in R88-27 or R89-4.

PUBLIC COMMENT

The Board adopted a Proposed Opinion and Order on November 15, 1989. The proposal appeared on January 5, 1990, at 14 Ill. Reg. 153. The Board has received the following public comment:

PC 1 JCAR  
PC 2 Administrative Code Division

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The Board acknowledges the contributions of Morton F. Dorothy and Anne E. Manly in preparing the Opinion and Order.

PC 1 was a JCAR post-adoption review comment on R89-4, which was redocketed in this matter, and is addressed below. The other comment was from the Code Division as to codification format.

#### HISTORY OF UST RULES

The UST rules are contained in 35 Ill. Adm. Code 731. They were adopted and amended as follows:

- R86-1 71 PCB 110, July 11, 1986; 10 Ill. Reg. 13998, August 22, 1986.
- R86-28 75 PCB 306, February 5, 1987; and 76 PCB 195, March 5, 1987; 11 Ill. Reg. 6017, April 3, 1987. Correction at 77 PCB 235, April 16, 1987; 11 Ill. Reg. 8684, May 1, 1987.
- R88-27 April 27, 1989; 13 Ill. Reg. 9519, effective June 12, 1989 (9/23/88 Technical Standards)
- R89-4 July 27, 1989; 13 Ill. Reg. 15010, effective September 12, 1989 (10/26/88 Financial Assurance Requirements)
- R89-10 This Docket (10/27/88 - 6/30/89)
- R89-19 Proposed January 11, 1990 (UST State Fund)
- R90-3 Next Update Docket (7/1/89 - 12/31/89)

On April 27, 1989 the Board adopted regulations which are identical in substance to the major revisions to the USEPA UST rules which appeared at 53 Fed. Reg. 37194, September 23, 1988. The Board separated the financial responsibility rules from the September 23 rules in order to avoid delaying adoption of the latter. The financial responsibility rules (53 Fed. Reg. 43370, 10/26/88) were adopted in R89-4.

Until R88-27 the UST rules were addressed in the RCRA update Dockets. The Board separated the September 23, 1988 rules from the RCRA update process because of the size and timing of the rulemaking, and because of the desirability of developing a separate mailing list for persons interested only in tanks. The Board will consider recombining the RCRA and UST updates after initial adoption of the new program.

#### FIRE MARSHAL RULES

As is discussed in greater detail below, the legislation requires that both the Board and Office of the State Fire Marshal adopt equivalents of much of the USEPA UST rules. The Fire Marshal's rules are contained in 41 Ill. Adm. Code 170, along with preexisting rules adopted prior to the USEPA equivalent rules. They were adopted, amended, corrected and objected to in the following actions:

- 13 Ill. Reg. 5669, effective April 21, 1989 (Technical Standards)
- 13 Ill. Reg. 7744, effective May 9, 1989.

- 13 Ill. Reg. 8515, effective May 19, 1989 (Financial Assurance)
- 13 Ill. Reg. 8875, effective May 19, 1989.
- 13 Ill. Reg. 13288, August 18, 1989.
- 13 Ill. Reg. 13305, August 18, 1989.
- 13 Ill. Reg. 14992, effective September 11, 1989.
- 13 Ill. Reg. 15126, September 22, 1989

#### STATUTORY AUTHORITY

The February 2, 1989 Opinion in R88-27 included a lengthy discussion of Section 22.4(d) of the Act, and other provisions of P.A. 85-861, the statutory basis of the UST program. The Board will reference that discussion here, and will only summarize it in this Opinion.

Section 22.4(d) of the Act requires the Board to adopt regulations which are "identical in substance" with USEPA's UST regulations. Ill. Rev. Stat. 1987, ch. 127 1/2, par. 154(b)(i) requires the Office of the Illinois State Fire Marshal to adopt regulations which are also to be "identical in substance"<sup>1</sup> to the same USEPA UST regulations. While the Fire Marshal is to adopt regulations only through "corrective action", the Board is to adopt the entire set of rules. In R88-27 the Board adopted regulations which, among other things, reflect the delineation between regulations before and after "corrective action".

The financial responsibility regulations bridge the corrective action gap. Operators are required to provide financial assurance immediately or in the near future. This will mainly be for tanks which are not known or suspected to be leaking. However, if a tank leaks, and the operator fails to take sufficient corrective action, the financial institutions will pay funds for corrective action which will be under the direction of the Agency. Thus the Fire Marshal will be responsible for receiving the financial assurance documents, but the Agency will be the recipient of any funds.

Ill. Rev. Stat. 1987, ch. 127 1/2, par. 154(b)(ii) allows the Fire Marshal to adopt "additional requirements". Section 22.4(d) of the Act allows the Board, upon receiving notice of such requirement, to elect to adopt further Board requirements which are "identical in substance" to the additional Fire Marshal requirements. The R88-27 and R89-4 rules followed the USEPA rules closely.

#### SUMMARY OF CHANGES

The USEPA actions are minor corrections to the major packages addressed in R88-27 and R89-4. As it turns out, these extend a date to a point which had already passed before the Board adopted the original date, and modify forms which the Board has just incorporated by reference anyway. The changes to the Board regulations are therefore minimal.

Section 731.191

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<sup>1</sup>The term "identical in substance" is defined in Section 7.2 of the Act (Ill. Rev. Stat. 1988 Supp., ch. 111 1/2, par 1007.2)

This Section is drawn from 40 CFR 280.91, which was amended at 54 Fed. Reg. 5452, February 3, 1989. 40 CFR 280.91(a) sets a compliance date of January 24, 1989 for the financial assurance requirements for certain operators. Because this date had already passed, in R89-4 the Board required immediate compliance. However, the federal compliance date has now been amended to add a complex proviso extending the effective date, for certain requirements to July 24, 1989, a date which has also passed. Because this may have caused confusion, the Board is now inserting the January 24, 1989 date and July 24 proviso.

#### Section 731.193

In Section 731.193(f), Board has inserted language which was inadvertently omitted in R89-4. This Section is drawn from 40 CFR 280.93(f), which was adopted at 53 Fed. Reg. 43372, October 28, 1988.

#### Section 731.203

Section 731.203 incorporates changes in the Trust Agreement Form. In R89-4 the Board incorporated these forms by reference, without setting the text forth in full. The Board has updated the incorporations by reference.

#### Appendix A

The notification form was amended at 53 Fed. Reg. 37208, September 23, 1988. The form should have been updated in R88-27, but was inadvertently omitted. Rather than include the form with the rules, the Board has incorporated the USEPA regulation by reference, and to require the use of Fire Marshal forms where available. If the forms are not available, the person may prepare a notification form based on the USEPA rule. This is the format employed for the financial assurance forms in R89-4.

#### ORDER

The Board hereby amends 35 Ill. Adm. Code 731 as follows. The Board will withhold filing these rules for 30 days to allow time for motions for reconsideration.

TITLE 35: ENVIRONMENTAL PROTECTION  
SUBTITLE G: WASTE DISPOSAL  
CHAPTER I: POLLUTION CONTROL BOARD  
SUBCHAPTER d: UNDERGROUND INJECTION CONTROL  
AND UNDERGROUND STORAGE TANK PROGRAMS

PART 731  
UNDERGROUND STORAGE TANKS

SUBPART A: PROGRAM SCOPE AND INTERIM PROHIBITION

Section  
731.101 Definitions and exemptions (Repealed)  
731.102 Interim prohibitions (Repealed)  
731.103 Notification Requirements (Repealed)

- 731.110 Applicability
- 731.111 Interim Prohibition for Deferred Systems
- 731.112 Definitions
- 731.113 Incorporations by Reference
- 731.114 Implementing Agency

SUBPART B: UST SYSTEMS: DESIGN, CONSTRUCTION, INSTALLATION AND NOTIFICATION

Section

- 731.120 Performance Standards for New Systems
- 731.121 Upgrading of Existing Systems
- 731.122 Notification Requirements

SUBPART C: GENERAL OPERATING REQUIREMENTS

Section

- 731.130 Spill and Overfill Control
- 731.131 Operation and Maintenance of Corrosion Protection
- 731.132 Compatibility
- 731.133 Repairs Allowed
- 731.134 Reporting and Recordkeeping

SUBPART D: RELEASE DETECTION

Section

- 731.140 General Requirements for all Systems
- 731.141 Petroleum Systems
- 731.142 Hazardous Substance Systems
- 731.143 Tanks
- 731.144 Piping
- 731.145 Recordkeeping

SUBPART E: RELEASE REPORTING, INVESTIGATION AND CONFIRMATION

Section

- 731.150 Reporting of Suspected Releases
- 731.151 Investigation due to Off-site Impacts
- 731.152 Release Investigation and Confirmation
- 731.153 Reporting and Cleanup of Spills and Overfills

SUBPART F: RELEASE RESPONSE AND CORRECTIVE ACTION

Section

- 731.160 General
- 731.161 Initial Response
- 731.162 Initial Abatement Measures and Site Check
- 731.163 Initial Site Characterization
- 731.164 Free Product Removal
- 731.165 Investigations for Soil and Groundwater Cleanup
- 731.166 Corrective Action Plan
- 731.167 Public Participation

SUBPART G: OUT-OF-SERVICE SYSTEMS AND CLOSURE

Section

- 731.170 Temporary Closure
- 731.171 Permanent Closure and Changes-in-Service
- 731.172 Assessing Site at Closure or Change-in-Service
- 731.173 Previously Closed Systems

731.174 Closure Records

SUBPART H: FINANCIAL RESPONSIBILITY

Section

- 731.190 Applicability
- 731.191 Compliance Dates
- 731.192 Definitions
- 731.193 Amount and Scope of Required Financial Responsibility
- 731.194 Allowable Mechanisms and Combinations
- 731.195 Financial Test of Self-insurance
- 731.196 Guarantee
- 731.197 Insurance or Risk Retention Group Coverage
- 731.198 Surety Bond
- 731.199 Letter of Credit
- 731.202 Trust Fund
- 731.203 Standby Trust Fund
- 731.204 Substitution of Mechanisms
- 731.205 Cancellation or Nonrenewal by Provider
- 731.206 Reporting
- 731.207 Recordkeeping
- 731.208 Drawing on Financial Assurance
- 731.209 Release from Financial Assurance Requirement
- 731.210 Bankruptcy or other Incapacity
- 731.211 Replenishment
- 731.900 Incorporation by reference (Repealed)
- 731.901 Compliance Date (Repealed)

Appendix A Notification Form

AUTHORITY: Implementing Section 22.4(d) and authorized by Section 27 of the Environmental Protection Act (Ill. Rev. Stat. 1983 Supp. ch. 111 1/2, pars. 1022.4(d) and 1027).

SOURCE: Adopted in R86-1 at 10 Ill. Reg. 14175, effective August 12, 1986; amended in R86-28 at 11 Ill. Reg. 6220, effective March 24, 1987; amended in R88-27 at 13 Ill. Reg. 9519, effective June 12, 1989; amended in R89-4 at 13 Ill. Reg. 15010, effective September 12, 1989; amended in R89-10 at 14 Ill. Reg. , effective .

SUBPART H: FINANCIAL RESPONSIBILITY

Section 731.191 Compliance Dates

Owners of petroleum underground storage tanks are required to comply with the requirements of this Subpart by the following dates:

- a) All petroleum marketing firms owning 1,000 or more USTs and all other UST owners that report a tangible net worth of \$20 million or more to the U.S. Securities and Exchange Commission (SEC), Dun and Bradstreet, the Energy Information Administration or the Rural Electrification Administration: - ~~Immediately~~ - January 24, 1989, except that compliance with Section 730.194(b) is required by: July 24, 1989.

- b) All petroleum marketing firms owning 100 through 999 USTs: October 26, 1989.
- c) All petroleum marketing firms owning 13 through 99 USTs at more than one facility: April 26, 1990.
- d) All petroleum UST owners not described in subsections (a), (b) or (c), including units of local government: October 26, 1990.

(Source: Amended at 14 Ill. Reg. , effective )

Section 731.193 Amount and Scope of Required Financial Responsibility

- a) Owners or operators of petroleum underground storage tanks shall demonstrate financial responsibility for taking corrective action and for compensating third parties for bodily injury and property damage caused by accidental releases arising from the operation of petroleum underground storage tanks in at least the following per-occurrence amounts:
  - 1) For owners or operators of petroleum underground storage tanks that are located at petroleum marketing facilities, or that handle an average of more than 10,000 gallons of petroleum per month based on annual throughput for the previous calendar year: \$1 million.
  - 2) For all other owners or operators of petroleum underground storage tanks: \$500,000.
- b) Owners or operators of petroleum underground storage tanks shall demonstrate financial responsibility for taking corrective action and for compensating third parties for bodily injury and property damage caused by accidental releases arising from the operation of petroleum underground storage tanks in at least the following annual aggregate amounts:
  - 1) For owners or operators of 1 to 100 petroleum underground storage tanks: \$1 million; and
  - 2) For owners or operators of 101 or more petroleum underground storage tanks: \$2 million.
- c) For the purposes of subsections (b) and (f) only, a "petroleum underground storage tank" means a single containment unit and does not mean combinations of single containment units.
- d) Except as provided in subsection (e), if the owner or operator uses separate mechanisms or separate combinations of mechanisms to demonstrate financial responsibility for:
  - 1) Taking corrective action;

- 2) Compensating third parties for bodily injury and property damage caused by sudden accidental releases; or
  - 3) Compensating third parties for bodily injury and property damage caused by nonsudden accidental releases, the amount of assurance provided by each mechanism or combination of mechanisms must be in the full amount specified in subsection (a) and (b).
- e) If an owner or operator uses separate mechanisms or separate combinations of mechanisms to demonstrate financial responsibility for different petroleum underground storage tanks, the annual aggregate required must be based on the number of tanks covered by each such separate mechanism or combination of mechanisms.
  - f) Owners or operators shall review the amount of aggregate assurance provided whenever additional petroleum underground storage tanks are acquired or installed. If the number of petroleum underground storage tanks for which assurance must be provided exceeds 100, the owner or operator shall demonstrate financial responsibility in the amount of at least \$2 million of annual aggregate assurance by the anniversary of the date on which the mechanism demonstrating financial responsibility became effective. If assurance is being demonstrated by a combination of mechanisms, the owner or operator shall demonstrate financial responsibility in the amount of at least \$2 million of annual aggregate assurance by the first-occurring effective date anniversary of any one of the mechanisms combined (other than a financial test or guarantee) to provide assurance.
  - g) The amounts of assurance required under this Section exclude legal defense costs.
  - h) The required per-occurrence and annual aggregate coverage amounts do not in any way limit the liability of the owner or operator.

(Source: Amended at 14 Ill. Reg. , effective )

#### Section 731.203 Standby Trust Fund

- a) An owner or operator using any one of the mechanisms authorized by Sections 731.196, 731.198 or 731.199 shall establish a standby trust fund when the mechanism is acquired. The trustee of the standby trust fund shall be an entity that has the authority to act as a trustee and whose trust operations are regulated and examined by the Illinois Commissioner of Banks and Trust Companies, or who complies with the Corporate Fiduciary Act. (Ill. Rev. Stat. 1987, ch. 17, pars. 1551-1 et seq.)
- b) Forms.
  - 1) The Board incorporates by reference 40 CFR 280.103(b) as adopted at 53 Fed. Reg. 43370, October 26, 1988 and as amended at 53 Fed. Reg. 51274, December 21, 1988. This Section incorporates no future editions or amendments.



- 2) The Fire Marshal shall promulgate forms based on the forms in 40 CFR 280.103(b), with such changes as are necessary under Illinois law.
  - 3) The owner or operator shall use such forms if available; otherwise, the owner or operator shall use the form in 40 CFR 280.103(b), except that instructions in brackets must be replaced with the relevant information and the brackets deleted.
  - 4) In addition, the owner or operator and trustee shall agree that Illinois law governs the trust.
- c) The Fire Marshal shall instruct the trustee to refund the balance of the standby trust fund to the provider of financial assurance if the Fire Marshal determines that no additional corrective action costs or third-party liability claims will occur as a result of a release covered by the financial assurance mechanism for which the standby trust fund was established.
  - d) An owner or operator may establish one trust fund as the depository mechanism for all funds assured in compliance with this Subpart.

(Source: Amended at 14 Ill. Reg. , effective )

#### Section 731.Appendix A

The Board incorporates by reference 40 CFR 280, Appendix I (1988), as amended at 53 Fed. Reg. 37208, September 23, 1988. This Section incorporates no future editions or amendments. Persons required to notify shall use forms provided by the Fire Marshal if available. Otherwise, they may prepare forms based on 40 CFR 280, Appendix I.

(Source: Amended at 14 Ill. Reg. , effective )

## Notification for Underground Storage Tanks

**FOR TANKS IN IL**

**RETURN COMPLETE TO**  
 US Coordinator  
 Division of Fire Prevention  
 FORM PG-Box 3800  
 TO Springfield IL 62766-3800

**STATE USE ONLY**

ID Number \_\_\_\_\_

Date Received \_\_\_\_\_

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FEDERAL INFORMATION

This form is required by Federal law for all underground tanks that have been installed in a building or structure, or that are used for the storage of petroleum products, and are subject to the provisions of the Federal Underground Storage Tank Regulations, 40 CFR 148.101 through 148.105. This form must be completed and submitted to the State Department of Environmental Protection and the Department of Transportation.

The owner of the tank must provide the following information:

**When Must This Form Be Submitted?** This form must be submitted to the State Department of Environmental Protection and the Department of Transportation within 30 days of the installation of the tank, or within 30 days of the discovery of a leak, whichever is later. This form must also be submitted to the State Department of Environmental Protection and the Department of Transportation within 30 days of the discovery of a leak, or within 30 days of the discovery of a spill, whichever is later.

**When Must This Form Be Submitted?** This form must be submitted to the State Department of Environmental Protection and the Department of Transportation within 30 days of the installation of the tank, or within 30 days of the discovery of a leak, whichever is later. This form must also be submitted to the State Department of Environmental Protection and the Department of Transportation within 30 days of the discovery of a leak, or within 30 days of the discovery of a spill, whichever is later.

**When Must This Form Be Submitted?** This form must be submitted to the State Department of Environmental Protection and the Department of Transportation within 30 days of the installation of the tank, or within 30 days of the discovery of a leak, whichever is later. This form must also be submitted to the State Department of Environmental Protection and the Department of Transportation within 30 days of the discovery of a leak, or within 30 days of the discovery of a spill, whichever is later.

This form is required by Federal law for all underground tanks that have been installed in a building or structure, or that are used for the storage of petroleum products, and are subject to the provisions of the Federal Underground Storage Tank Regulations, 40 CFR 148.101 through 148.105. This form must be completed and submitted to the State Department of Environmental Protection and the Department of Transportation.

The owner of the tank must provide the following information:

**When Must This Form Be Submitted?** This form must be submitted to the State Department of Environmental Protection and the Department of Transportation within 30 days of the installation of the tank, or within 30 days of the discovery of a leak, whichever is later. This form must also be submitted to the State Department of Environmental Protection and the Department of Transportation within 30 days of the discovery of a leak, or within 30 days of the discovery of a spill, whichever is later.

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STATE INFORMATION

Please complete this form for each tank. This form must be completed for each location containing a tank. There may be more than one tank at this location. Photocopy this form for multiple copies of tanks at the same location.

**I. IDENTIFYING INFORMATION**

Name of Tank \_\_\_\_\_

State Agency \_\_\_\_\_

County \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Area Code \_\_\_\_\_ Phone Number \_\_\_\_\_

Type of Tank (check all that apply):

Fuel  Solvent  Other \_\_\_\_\_

Storage  Process  Other \_\_\_\_\_

**II. IDENTIFYING INFORMATION**

Indicate number of tanks at this location:

Form Name of Company Site Identifier, as applicable \_\_\_\_\_

State Address of State Road, as applicable \_\_\_\_\_

County \_\_\_\_\_

City/Post Office \_\_\_\_\_ State \_\_\_\_\_ ZIP Code \_\_\_\_\_

LOCKED:  UNLOCKED:

Map Box (see instructions)

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III. IDENTIFYING INFORMATION FOR STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

Name of State Department \_\_\_\_\_ Area Code \_\_\_\_\_ Phone Number \_\_\_\_\_

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IV. STATE OF ILLINOIS

Has this tank been installed in accordance with the provisions of the Illinois Underground Storage Tank Regulations, 35 ILCS 405.101 through 405.105?

If not, please explain (attach separate sheet): \_\_\_\_\_

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I certify, under penalty of law, that I have diligently examined and am familiar with the information submitted in this and all attached documents, and that based on my examination and other sources, I am immediately responsible for obtaining the information, believe that the submitted information is true, accurate, and complete.

Name and office title of owner or operator representative \_\_\_\_\_

Signature \_\_\_\_\_


Date Signed \_\_\_\_\_

CONTINUE ON REVERSE SIDE

Task-Instruction No. (e.g. ABC-1234)	Task No.	Task No.	Task No.	Task No.	Task No.
1. State of Task - (Mark all that apply): - <del>Complete</del> - <del>Temporary Complete</del> - <del>Permanent Complete</del> - <del>Brought into scope</del>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Estimate of Task - (Mark all that apply):					
4. Method of Construction - (Mark all that apply): - <del>Site</del> - <del>Concrete</del> - <del>Formwork</del> - <del>Other</del>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Material - (Mark all that apply): - <del>Concrete</del> - <del>Reinforcement</del> - <del>Other</del>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Equipment - (Mark all that apply): - <del>Concrete Pump</del> - <del>Other</del>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Safety - (Mark all that apply): - <del>Base</del> - <del>Concrete</del> - <del>Formwork</del> - <del>Other</del>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Substances - (Mark all that apply): - <del>Concrete</del> - <del>Reinforcement</del> - <del>Other</del>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Additional Information - (Mark all that apply): - <del>Concrete</del> - <del>Reinforcement</del> - <del>Other</del>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IT IS SO ORDERED.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion and Order was adopted on the 1<sup>st</sup> day of March, 1990, by a vote of 7-0.

  
\_\_\_\_\_  
Dorothy M. Gunn, Clerk  
Illinois Pollution Control Board