

BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

RECEIVED
CLERK'S OFFICE

MAR 01 2006

STATE OF ILLINOIS
Pollution Control Board

IN THE MATTER OF:)
)
PROPOSED AMENDMENTS TO: REGULATION) R 04-22 (B)
OF PETROLEUM LEAKING UNDERGROUND) (UST Rulemaking))
STORAGE TANKS (35 ILL.ADM.CODE 732))

IN THE MATTER OF:) R 04-23 (B)
PROPOSED AMENDMENTS TO:REGULATION) (UST Rulemaking Consolidated)
OF PETROLEUM LEAKING UNDERGROUND)
STORAGE TANKS (35 ILL.ADM.CODE 734))

NOTICE

Dorothy Gunn, Clerk
Pollution Control Board
James R. Thompson Center
100 W. Randolph, Ste. 11-500
Chicago, Illinois 60601
(Overnight Mail)

Marie Tipsord, Hearing Officer
Pollution Control Board
James R. Thompson Center
100 W. Randolph, Ste 11-500
Chicago, Illinois 60601
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See Attached Service List

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the Illinois Environmental Protection Agency's Submission of Pre-Filed Testimony For The March 23, 2006 Hearing and Testimony of Douglas W. Clay Regarding The Illinois Pollution Control Board's Proposed 35 ILL.ADM.Code 732.845 and 734.845 on behalf of the Illinois Environmental Protection Agency, a copy of which is herewith served upon you.

ENVIRONMENTAL PROTECTION AGENCY
OF THE STATE OF ILLINOIS

By:



Kyle Rominger
Assistant Counsel

DATE: February 28, 2006
Agency File #:
Illinois Environmental
Protection Agency
1021 North Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276

THIS FILING IS SUBMITTED ON RECYCLED PAPER

MAR 01 2006

STATE OF ILLINOIS
Pollution Control Board

IN THE MATTER OF:)	
PROPOSED AMENDMENTS TO)	
REGULATION OF PETROLEUM)	R 04-22 (B)
LEAKING UNDERGROUND STORAGE)	(UST Rulemaking)
TANKS (35 ILL. ADM. CODE 732))	

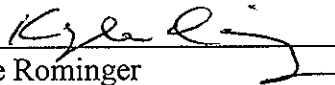
IN THE MATTER OF:)	
PROPOSED AMENDMENTS TO)	
REGULATION OF PETROLEUM)	R 04-23(B)
LEAKING UNDERGROUND STORAGE)	(UST Rulemaking)
TANKS (35 ILL. ADM. CODE 734))	Consolidated

SUBMISSION OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S
PRE-FILED TESTIMONY FOR THE MARCH 23, 2006, HEARING

NOW COMES the Illinois Environmental Protection Agency ("Illinois EPA"), by and through one of its attorneys, Kyle Rominger, and submits the enclosed pre-filed testimony of Doug Clay for the March 23, 2006, hearing.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY



Kyle Rominger
Assistant Counsel

DATED: 2.28.06
1021 North Grand Avenue East
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(217) 782-5544

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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MAR 01 2006

STATE OF ILLINOIS
Pollution Control Board

IN THE MATTER OF:)

PROPOSED AMENDMENTS TO)
REGULATION OF PETROLEUM) R 04-22 (B)
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TANKS (35 ILL. ADM. CODE 732))

IN THE MATTER OF:)

PROPOSED AMENDMENTS TO)
REGULATION OF PETROLEUM) R 04-23(B)
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TANKS (35 ILL. ADM. CODE 734)) Consolidated

TESTIMONY OF DOUGLAS W. CLAY REGARDING
THE ILLINOIS POLLUTION CONTROL BOARD'S
PROPOSED 35 ILL. ADM. CODE 732.845 AND 734.845

My name is Doug Clay. I am the manager of the Leaking Underground Storage Tank ("LUST") Section within the Bureau of Land of the Illinois Environmental Protection Agency ("Agency"). I have been in my current position since September of 1994. This section is primarily responsible for reviewing the technical adequacy of plans, reports and associated budgets for the remediation of releases from underground storage tanks regulated under 35 Ill. Adm. Code, Parts 731, 732 and 734.

Prior to assuming my current position, I was the manager of the Disposal Alternative Unit within the Permit Section of the Bureau of Land. I have also worked in the Permit Section in the Bureau of Water. I have been employed at the Illinois EPA since 1983 following the receipt of a B.S. degree in Civil Engineering from the

University of Illinois. I have been a Registered Professional Engineer in Illinois since 1989.

Today I will be testifying with regard to the Illinois Pollution Control Board's ("Board's") proposed 35 Ill. Adm. Code 732.845 and 734.845 published for public comment in the Board's January 5, 2006, Opinion and Order. My testimony will address issues raised in the Board's January 5, 2006, Opinion and Order as well as the Hearing Officer's February 16, 2006, Order.

In answer to the Board's question about the Agency's LUST database, the database does not contain adequate information to determine lump sum payments for professional consulting services. As we stated in earlier testimony, we do not believe that lump payment amounts for professional consulting services should be determined from future reimbursement submissions over the next few years. Collecting this data, breaking it down in great detail, as has been proposed at previous hearings would require significant resources by the Illinois EPA, which we simply do not have. In addition, accepting the costs as submitted without review (i.e. no quality control) would invite inflated amounts knowing that these will be used to set future acceptable costs. Also, this would require that every consultant that does LUST work in the State of Illinois adopt a complicated, confusing, and overly burdensome reimbursement accounting system for seeking corrective action costs that has been designed and proposed by just a few consulting firms. This type of system would undoubtedly increase the costs for preparation of budgets and reimbursement packages, thus increasing overall corrective costs for each site.

The Agency has reviewed the scope of work proposed by the Board, with a few modifications, believes it to adequately represent the work required to remediate a leaking underground storage tank release in Illinois. We do not believe that the scope of work needs to be part of Board rules, and do not intend to propose Agency rules regarding this issue. Attached as part of my testimony (Attachments 1 and 2) are two spreadsheets that include the scopes of work, the title of the personnel that may perform the work, a reasonable number of hours for the identified personnel to perform the work, and a comment field.

To develop this attachment the Agency convened a workgroup made up of the five LUST Section unit managers, five senior LUST Section project managers, two senior LUST Claims Unit reviewers, and myself. This workgroup has a combined 140 years of experience reviewing and evaluating LUST sites. The information in Attachments 1 and 2 represent the consensus of the workgroup. We grouped some scopes of work together for the purpose of assigning hours and, where appropriate, made comments for additional clarification. Where the hours field next to a scope of work has been left blank the comments field provides an explanation of why. All time is rounded up to a full hour, so the minimum amount of time assigned to a scope of work is 1 hour. The personnel and hours assigned to each scope of work represents what the Agency believes to be a reasonable amount of time for the identified personnel to perform the identified work.

Also attached as part of my testimony (Attachments 3 and 4) is a table summarizing the lump sum amounts for each of the scopes of work from Attachments 1 and 2. The table provides a lump sum range for each scope of work, based on the range of the high and low rates for each personnel title. The high and low rates are taken from

Appendix E that was just adopted by the Board. It should be emphasized that we identified a Project Manager, whose rate ranges from \$90 to \$100 per hour, as performing most work. However, it is not necessary for a Project Manger to perform much of the work. The Agency has observed that in most cases other personnel, such as geologists, scientists, or technicians, perform much of the work. Because these other personnel have lower rates, the work can be performed well within the lump sum amounts.

The Agency believes that the unit rates for professional services (half-day rates for field work and travel rates) continue to be appropriate and should remain in Sections 732.845 and 734.845 in addition to the lump sum amounts. They should continue to be directly linked to productivity numbers (e.g. number of borings per half-day, excavation quantity per half-day, etc.) as in the Board's proposed rules. It is reasonable to expect a certain level of productivity for these activities. As with other costs in Subpart H, payment from the Fund may exceed the lump sums and unit rates if the owner or operator can demonstrate unusual or extraordinary circumstances under Section 732.860 or 734.860.

As we testified during previous hearings, Illinois is not the first state to adopt in regulations lump sums and unit rates for remedial work, including professional services. Many of the lump sums and unit rates proposed in Subdocket B are comparable to lump sums and unit rates adopted in California, Louisiana, Massachusetts, Nevada, Tennessee, and Texas. Regulations from these states were previously submitted to the Board and are already a part of the record.

ATTACHMENT I SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
<p>Section 732.845(a)(1) Preparation for the abandonment or removal of USTs</p>			
<p>1. Project Management</p>			<p>All Project Management work is identified under Personnel Column as PM.</p>
<p>2. Correspondence a. Office of the Illinois State Fire Marshal (OSFM) 1. Prepare and submit initial Notification Form for Underground Storage Tanks 2. Prepare Application for Permit for Removal/Abandonment of Underground Storage Tanks and submit to owner/operator for signature 3. Submit Application for Permit for Removal/Abandonment to OSFM 4. Prepare and submit LUST Fund Eligibility and Deductibility Application 5. Prepare and submit amended Notification Form</p>	<p>Tech</p>	<p>1</p>	<p>2.a. 1, 2, 3 & 5 are performed by tank removal contractor and costs are included in tank removal lump sum.</p>
<p>b. Illinois Environmental Protection Agency (IEPA) 1. Prepare and submit early action extension 2. Follow up</p>	<p>PM</p>	<p>1</p>	<p>Not required in all cases.</p>
<p>c. Correspond with and update client</p>			<p>Not corrective action.</p>
<p>3. Waste Disposal a. Determine early action excavation limits</p>	<p>PM</p>	<p>1</p>	
<p>b. Prepare waste profile and arrange for landfill approval</p>	<p>Tech</p>	<p>4</p>	<p>These hours include field work that is not covered under the half-day rates.</p>
<p>c. Prepare waste manifests or tracking forms</p>	<p>PM</p>	<p>1</p>	
<p>4. Plan and Report Preparation</p>	<p>PM</p>	<p>2</p>	
<p>a. Prepare site health and safety plan</p>			
<p>5. Resource Coordination</p>	<p>PM</p>	<p>4</p>	
<p>a. Arrange for subcontractors (e.g., excavator, tank removal contractor, backfill, landfill) b. Schedule project c. Call J.U.L.E. and/or municipality to locate utilities</p>			<p>Task performed by tank removal contractor. Cost included in tank removal lump sum.</p>

ATTACHMENT I SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Personnel

Hours

Comments

Scope of Work	Personnel	Hours	Comments
Section 732.845(g)(3) Preparation and submission of 20-day and 45-day reports			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence			2.a. already included in other line items and 2.b. is not corrective action.
3. Records Gathering			3.a. and c included in hours for preparation of 45-day Report. 3.b. not required for preparation of 20 or 45-day Reports.
4. Waste Disposal	PM	1	
5. Technical Evaluation	PM	6	a. not required for preparation of 20 or 45-day Reports. b. included in hours for preparation of 45-day Report. c. includes field work that is not covered under the half-day rates.
6. Plan and Report Preparation	PM	1	Previously prepared under 732.845(a)(1) task 4.a. No revision necessary for preparation and submission of 20 and 45-day reports.

ATTACHMENT I SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
<p>c. Prepare 45-day Report</p> <ol style="list-style-type: none"> 1. Provide information pertaining to: <ol style="list-style-type: none"> A. Site Identification B. Release Information C. Early Action D. Site Information <ol style="list-style-type: none"> 1. Nature and estimated quantity of release 2. Data concerning: <ol style="list-style-type: none"> a. Surrounding populations b. Water quality c. Use and approximate locations of wells potentially affected by the release d. Subsurface soil conditions e. Location of subsurface sewers f. Climatological conditions g. Land use 3. A discussion of what was done to measure for the presence of a release 4. Action taken to prevent further release of the regulated substance into the environment 5. A discussion of the action taken to monitor and mitigate fire and safety hazards posed by vapors of free product that has migrated from the UST excavation zone and entered subsurface structures 	PM	8	
<p>E. Assisting Document</p> <ol style="list-style-type: none"> 1. Site map to scale and oriented north showing: <ol style="list-style-type: none"> a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc.) e. Nearby structures (buildings, roads, etc.) f. Soil boring(s) (if present) g. Monitoring well(s) and/or sumps (if present) h. Property boundaries i. Sample location points 2. Area map showing the site in relation to surrounding properties. This map should identify the facilities on the surrounding properties 3. Cross-section, to scale, showing the USTs and the excavation 4. Analytical/screening results in tabular format, including the results of soil samples required 	CAD Operator	8	
	PM	2	

ATTACHMENT I SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
pursuant to 35 Ill. Adm. Code 732.202(h) or 45 ILCS 5/57-57.17. 5. UST information in a tabular format, including: a. Total number of UST(s) on site b. Volume of the UST(s) (in gallons) c. The material stored in the UST(s) d. Identification of UST system(s) that had a release e. Identification of UST system(s) that were repaired, removed, or abandoned in-place			UST information table included on Agency forms under 6.c.1.B. above (Release Information)
6. Copy of OSFM Permits or notifications	Administrative Asst	1	6, 8 & 9 combined for total of 1 hour.
7. Narrative of tank removal and cleaning operations; describe how wastes generated during the tank removal were managed, treated, and disposed of	PM	1	
8. Photographs of UST removal activities and the excavation.			6, 8 & 9 combined for total of 1 hour.
9. Copies of waste manifests for soil and groundwater transported off-site			Certification added to IPCB's proposal. PM/Senior staff reference deleted.
d. Review and certification of 20-Day and 45-Day Reports and application for payment.	LPE or LPG	1	Added reference to application for payment.
7. Resource Coordination			Already done prior to tank removal. Not required for preparation and submission of 20 and 45-day reports.
a. Call J.U.L.I.E. and/or municipality to locate utilities			
8. Distribution	Administrative Asst	2	Covers all copying and delivering costs. Added references to application for payment.
a. Deliver draft 20-day Certification and 45-Day Report and application for payment to owner/operator for review and signature			
b. Make copies of 20-Day Certification and 45-Day Report and application for payment for distribution			
c. Deliver completed 20-Day Certification and 45-Day Report and application for payment to IEPA and owner/operator			
9. Prepare applications for payment	Account Tech	8	This is added to IPCB's proposal.

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work

Personnel

Hours

Comments

Section 732.845(a)(6) Preparation and submission of free product removal reports				
1. Project Management				All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with and update Illinois Environmental Protection Agency (IEPA) b. Correspond with and update client				2.a. already included in other line items and 2.b. is not corrective action.
3. Waste Disposal a. Review disposal documentation	PM		1	
4. Free Product Report Preparation a. Prepare Free Product Removal Report 1. Provide information pertaining to: A. Site Identification B. Free Product Information 1. Name(s) of person(s) responsible for implementing the free product removal measures 2. Estimated quantity, type, and thickness of free product observed or measured in boreholes, wells, excavation, etc. 3. The type of free product recovery system used and technical justification for the method of recovery chosen 4. Whether any discharge will take place on- or off-site during the recovery operation and where this discharge (point) will be located 5. Type of treatment applied to (the free product), and the effluent quality expected from any discharge 6. Steps that have been taken or that are being taken to obtain necessary permits for any discharge 7. The disposition of the recovered free product	PM		4	

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
<p>C. Assting Documentation</p> <ol style="list-style-type: none"> 1. Site map to scale and oriented north showing: <ol style="list-style-type: none"> a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc.) e. Nearby structures (buildings, roads, etc.) f. Soil boring(s) (if present) g. Monitoring well(s) and/or sumps (if present) h. Locations where free product was encountered including its estimated thickness i. Location of recovery points j. Location of the treatment unit k. Location of discharge points l. Property boundaries 	CAD Operator	1	Site map already prepared under Early Action. Only modifications required at this point.
<ol style="list-style-type: none"> 2. Table showing the dates that free product recovery was conducted and the amount of free product recovered on each date 3. Copies of waste manifests 	PM	1	
<ol style="list-style-type: none"> 5. Review and certification of free product removal report. 	Administrative Asst LPE or LPG	1	Added to IPCB's proposal.
<ol style="list-style-type: none"> 6. Distribution <ol style="list-style-type: none"> a. Deliver draft free product removal report to owner/operator for review and signature b. Make copies of free product removal report for distribution c. Deliver completed report to IEPA and owner/operator 	Administrative Asst	2	Covers all copying and delivering costs.

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work Personnel Hours Comments

<p>Section 732.845(a)(7) Preparation and submission of reports submitted pursuant to Section 732.202(h)(3)</p> <ol style="list-style-type: none"> 1. Site characterization/narrative 2: Characterization/narrative of water encountered in UST excavation 3. Completion of Property Owner Summary Form 4. Recording NFR Letter 	<p>PM Admin Asst</p>	<p>2 2</p>	<p>This report submitted as part of 45-Day Report. All other costs related to this report are included in costs for 45 Day Report (e.g., LPG/LPE certification, distribution). Reference in title to "734.210(h)(3)" changed to "732.202(h)(3)"</p>
<p>Section 732.845(b)(1) Preparation and submission of site classification plans, site classification preparation, fieldwork, field oversight, and the preparation and submission of the site classification completion report</p>			
<p>SITE CLASSIFICATION WORK PLAN</p>			
<p>1. Project Management</p>			<p>All Project Management work is identified under Personnel Column as PM.</p>
<p>2. Correspondence a. Correspond with Agency b. Correspond with and update client</p>			<p>2.a. already included in other line items and 2.b. is not corrective action.</p>
<p>3. Technical Evaluation a. Conduct fieldwork b. Provide field oversight</p>	<p>PM Geologist Tech</p>	<p>10 10 20</p>	<p>These hours include field work that is not covered under the half-day rates. There are no half-day rates for Site Classification field work.</p>

Scope of Work

Personnel Hours Comments

Scope of Work	Personnel	Hours	Comments
<p>4. Plan Preparation</p> <p>a. Prepare Site Classification Work Plan</p> <p>1. Provide information concerning:</p> <p>A. Site Identification</p> <p>B. Site Information</p> <p>C. Site Classification</p> <p>1. Method of Physical Soil Classification</p> <p>2. Number of soil borings to be advanced on-site</p> <p>3. Whether soil borings are proposed to be advanced for reasons other than Physical Soil Classification or investigation of migration pathways</p> <p>4. Whether monitoring wells are proposed on-site</p> <p>5. Physical Soil Classification</p> <p>a. Scientific publications/geologic maps that will be reviewed to determine consistency with Plate 1 of the Illinois State Geological Survey-Circular 532</p> <p>b. Drilling methods, auger types, sampling procedures and sampling devices that will be used</p> <p>c. Basis for determining the location (include number and spacing) of soil borings</p> <p>d. How the proposed final soil boring configuration and boring depths will provide the greatest likelihood of determining the geologic characteristics of the site</p> <p>e. What will be done if auger refusal occurs or bedrock is encountered during drilling</p> <p>f. What will be done if anomalies are encountered during drilling</p> <p>g. What will be done to prevent cross-contamination between water-bearing units that may be encountered during drilling</p> <p>6. Groundwater Investigation</p> <p>a. Drilling methods that will be used</p> <p>b. Basis for determining the location and number of monitoring wells placed at the site</p> <p>c. Monitoring well installation procedures</p> <p>d. Activities that will be taken to prevent cross-contamination during well installation</p> <p>e. Basis for determining well construction material</p> <p>f. Basis for determining the monitoring well-screen depth and screened interval</p> <p>g. Monitoring well development procedures</p> <p>h. Monitoring well sampling procedures</p> <p>i. Activities that will be taken to prevent cross-contamination between groundwater samples</p> <p>j. How the proposed final monitoring well configuration will provide the greatest likelihood of detecting the migrations of groundwater contamination</p>	PM	8	Under 4.a.1.c.7 and 8, reference to LPG added. Under 4.a.1.c.7, reference to "Class II" groundwater changed to "Class III". Added 4.a.1.c.9 and 10.

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
<p>k. Steps that will be taken to determine groundwater elevation and flow direction.</p> <p>7. How the LPE/LPG will verify whether Class III Special Resource Groundwater exists within 200 feet of the UST system</p> <p>8. How the LPE/LPG will identify and locate all community water supply wells within 2,500 feet of the UST system and all potable water supply wells within 200 feet of the UST system, and determine if the UST system is within the regulated recharge area of any community water supply well or potable water supply well</p> <p>9. How the LPE/LPG will locate all surface water bodies within 100 feet of the UST system and determine whether they have been adversely affected by the a sheen or free product</p> <p>10. How the LPE/LPG will determine whether there is evidence of petroleum or vapor migration that threatens human health or safety or that may cause explosions in confined spaces</p>			

Scope of Work	Personnel	Hours	Comments
<p>9. Classification by Exposure Pathway Exclusion</p> <p>a. Discussion of the activities to determine the full extent and concentrations of contaminants in soil and/or groundwater exceeding the Tier 1 remediation objectives</p> <p>b. Discussion of the tests to be performed to determine whether or not the following requirements will be met:</p> <ol style="list-style-type: none"> 1. Attenuation capacity of the soil will not be exceeded for any of the organic contaminants 2. Soil saturation limit will not be exceeded for any of the organic contaminants 3. Contaminated soils do not exhibit any of the reactivity characteristics of hazardous waste per 35 Ill. Adm. Code 721.123 4. Contaminated soils do not exhibit a $pH \leq 2.0$ or ≥ 12.5 5. Contaminated soils which contain arsenic, barium, cadmium, chromium, lead, mercury, selenium or silver (or their associated salts) do not exhibit any of the toxicity characteristics of hazardous waste per 35 Ill. Adm. Code 721.124 <p>c. Discussion of how the inhalation exposure route will be evaluated to determine that:</p> <ol style="list-style-type: none"> 1. An institutional control is in place that requires safety precautions for construction worker populations and compliance with #2 below 2. Any contaminant of concern within ten (10) feet of land surface or within ten (10) feet of any man-made pathway does not exceed Tier 1 remediation objectives; OR an Agency approved engineered barrier is in place <p>d. Discussion of how the soil ingestion exposure route will be evaluated to determine that:</p> <ol style="list-style-type: none"> 1. An institutional control is in place that requires safety precautions for construction worker populations and compliance with #2 below 2. Any contaminant of concern within ten (10) feet of land surface or within three (3) feet of any land surface does not exceed Tier 1 remediation objectives; OR an Agency approved engineered barrier is in place <p>e. Discussion of how the groundwater ingestion exposure route will be evaluated to determine the following:</p> <ol style="list-style-type: none"> 1. The source of the release is not located within the minimum/maximum setback zone or regulated recharge area of a potable water supply well 2. Any area within 2,500 feet from the source of the release is restricted under a local ordinance which prohibits the use of groundwater as a potable supply 3. The concentration of any contaminant of concern in groundwater within the minimum/maximum setback zone of a potable water supply well meets the applicable Tier 1 remediation objective 4. The concentration of any contaminant of concern in groundwater discharging into a surface water will meet the applicable surface water quality standard per 35 Ill. Adm. Code 302 			<p>Classification by exposure pathway is no longer an option under Part 732 per the amendments just adopted by the Board.</p>

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
10. Site map to scale and oriented north showing: <ul style="list-style-type: none"> a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc) e. Nearby structures (buildings, roads, etc.) f. Location of the proposed soil boring(s) g. Location of the proposed monitoring wells (if required) h. Property boundaries i. 200-foot radius from the UST system 	CAD Operator	2	Site map already prepared under Early Action. Only modifications required at this point.
11. Chart indicating the following: <ul style="list-style-type: none"> a. Boring identification b. Depth of boring (in feet) c. Number of samples from each boring that will be submitted for geotechnical analysis d. Identification of geotechnical tests that will be performed on samples 	PM	1	
<ul style="list-style-type: none"> b. Prepare budget for site classification work plan c. Review and certification of site classification work plan and budget. 	Account Tech LPE or LPG	4 2	PM/Senior staff reference deleted.
5. Distribution <ul style="list-style-type: none"> a. Deliver draft site classification work plan and budget to owner/operator for review and signature b. Make copies of site classification work plan and budget for distribution c. Deliver site classification work plan and budget to IEPA and owner/operator 	Administrative Asst	2	Covers all copying and delivering costs. Changed c to reference "site classification work plan and budget" instead of "completed report".
SITE CLASSIFICATION COMPLETION REPORT			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence <ul style="list-style-type: none"> a. Correspond with Agency b. Correspond with and update client 			2.a. already included in other line items and 2.b. is not corrective action.

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
<p>3. Technical Evaluation</p> <ul style="list-style-type: none"> a. Conduct fieldwork b. Provide field oversight <p>4. Report Preparation</p> <ul style="list-style-type: none"> a. Prepare Site Classification Completion Report <ul style="list-style-type: none"> 1. Provide information concerning: <ul style="list-style-type: none"> A. Site Identification B. Site Information C. Site Classification Summary D. Site Classification by Methods One or Two E. Site Evaluation <ul style="list-style-type: none"> 1. Physical Soil Classification <ul style="list-style-type: none"> a. Soil borings <ul style="list-style-type: none"> 1. A list of publications reviewed and preliminary conclusions concerning the site geology 2. Soil borings logs 3. Site map to scale and oriented north showing: <ul style="list-style-type: none"> i. Soil boring locations ii. UST system(s) iii. 200-foot radius from UST system iv. Property boundaries b. Method One soil properties test results (include calculations, methodologies, and complete laboratory reports) <ul style="list-style-type: none"> 1. Soil particle analysis 2. Soil moisture content 3. Soil classification 4. Unconfined compression test 5. In-situ hydraulic conductivity 6. Ex-situ hydraulic conductivity c. Method Two soil properties test results (include calculations, methodologies, and complete laboratory reports) <ul style="list-style-type: none"> 1. Soil particle analysis 2. Ex-situ hydraulic conductivity; and calculated yield of geological material 3. In-situ hydraulic conductivity and yield of geologic material 	<p>PM CAD Operator</p>	<p>8 4</p>	<p>Not required as part of preparing and submitting Site Classification Completion Report.</p> <p>Site map already prepared under Early Action. Only modifications required at this point.</p>

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
<p>2. Groundwater Investigation</p> <p>a. If groundwater investigation was required, provide the following:</p> <ol style="list-style-type: none"> 1. Discussion of how the monitoring well configuration provides the greatest likelihood of detecting migration of groundwater contamination 2. Monitoring well construction diagrams 3. Table showing static water elevations 4. Sample collection shipment and preservation information 5. Completed chain-of-custody form(s) 6. Copies of laboratory reports (include field and lab blanks) 7. Analytical results in tabular format 8. Site map to scale and oriented north showing: <ol style="list-style-type: none"> i. Monitoring well locations ii. Potentiometric surface map iii. Groundwater flow direction iv. 200-foot radius from UST system and v. Property boundaries <p>b. If no groundwater investigation was performed, provide the following:</p> <ol style="list-style-type: none"> 1. Demonstrate whether groundwater is present within the depth of boring used to perform physical soil classification under the selected method (Method One under subsection (c) or Method Two under subsection (d)) 2. Demonstrate whether groundwater is withdrawn for potable use within 1000 feet of the UST system and at what depths 3. Demonstration whether seasonal fluctuation in groundwater could result in groundwater contacting contaminated soil (e.g., historical records) 	<p>PM CAD Operator</p>	<p>4 2</p>	<p>Site map already prepared under Early Action. Only modifications required at this point.</p>
<p>F. Water Well Survey</p> <ol style="list-style-type: none"> 1. Results of the survey conducted to identify all community water supply wells within 2,500 feet of the UST system and all potable water supply wells within 200 feet of the UST system (include copies of well logs and all correspondence to and from the Illinois State Water Survey and the Illinois State Geological Survey). 2. Local units of government contacted to determine if there is a local ordinance or policy regulating the usage of potable water supply wells 3. Site map to scale showing all of the community water supply wells within 2,500 feet of the UST system and all potable water supply wells within 200 feet of the UST system (radii of 200, 400, 1,000 and 2,500 feet from the UST system should be marked on the map) 4. Table indicating the setback zone for each community or potable water supply well and the distance from the UST system to the well (the location of each well must be identified on the 	<p>PM</p>	<p>4</p>	<p>Site map already prepared under Early Action. Only modifications required at this point.</p>

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
<p>map by numbers corresponding to information provided in the table)</p> <p>5. The sources consulted in determining whether the UST system is within the regulated recharge area of any community or potable water supply well</p> <p>G. Migration Pathways</p> <ol style="list-style-type: none"> 1. Discussion of the investigation conducted to identify all potential natural and man-made migration pathway that are on the site, rights-of-way attached to the site, or in any area surrounding the site that may be adversely affected as a result of a release of petroleum from the UST system 2. Discussion of further investigations conducted to determine if there is evidence that migration of petroleum or vapors along such pathways threatens human health or the environment or may cause explosions in basements, crawl spaces, utility conduits, storm or sanitary sewers, Vaults or other confined spaces 3. Discussion of the findings based on the investigations performed. 4. Site map to scale and oriented north showing: <ol style="list-style-type: none"> a. The UST system(s) and excavation b. Product and dispenser lines c. Potential natural and man-made pathways on-site, in rights-of-way attached to the site or in areas that may be adversely affected by the release d. Soil boring locations e. Property boundaries 	<p>PM</p>	<p>3 1</p>	<p>Site map already prepared under Early Action. Only modifications required at this point.</p>
<p>H. Class III Special Resource Groundwater</p> <ol style="list-style-type: none"> 1. Discussion of the steps taken to determine if Class III ground water exists within 200 feet of the site 2. Site map to scale and oriented north showing: <ol style="list-style-type: none"> a. Location of Class II groundwater b. Radius of 200 feet from the UST system(s) I. Surface Bodies of Water <ol style="list-style-type: none"> 1. Discussion of the steps taken to locate all surface bodies of water on site and within 100 feet of the site, and one located, the steps taken to determine if they have been adversely affected by the presence of a sheen or free product layer resulting from a release of petroleum from the UST system. 2. Site map to scale and oriented north showing the locations of the surface bodies of water on site and within 100 feet of the site 	<p>PM</p>	<p>2 1</p>	<p>Site map already prepared under Early Action. Only modifications required at this point.</p>

<p>J. Classification by Exposure Pathway Exclusion</p> <ol style="list-style-type: none"> 1. Extent of contamination exceeding Tier 1 remediation objectives <ol style="list-style-type: none"> a. Table showing the analytical results and depth of samples b. Site map showing the soil sample location points and groundwater monitoring well locations c. Site map showing the extent of soil and/or groundwater contamination exceeding Tier 1 remediation objectives d. Cross-section of the site showing the areas of soil contamination exceeding Tier 1 remediation objectives 2. Physical soil characteristics <ol style="list-style-type: none"> a. Whether or not the concentration of any organic contaminants exceeded the attenuation capacity of the soil b. Whether or not the organic contaminants exceeded the soil saturation limit c. Whether or not the soils exhibited any characteristics of reactivity for hazardous waste d. pH of the soils e. Whether or not contaminated soils exhibited any characteristics of toxicity for hazardous waste 3. Inhalation exposure route <p>Demonstrate the following:</p> <ol style="list-style-type: none"> a. An Agency-approved engineered barrier is in place b. Safety precautions for construction workers will be taken if Tier 1 remediation objectives for construction workers are exceeded. 4. Ingestion exposure route <p>Demonstrate the following:</p> <ol style="list-style-type: none"> a. An Agency-approved engineered barrier is in place b. Safety precautions for construction workers will be taken if Tier 1 remediation objectives for construction workers are exceeded. 5. Groundwater ingestion exposure route <p>Demonstrate the following:</p> <ol style="list-style-type: none"> a. Source of the release is not located within the minimum or maximum setback zone or regulated recharge area of a potable water supply well b. Any area within 2,500 feet from the source of the release is restricted under a local ordinance which prohibits the use of groundwater as a potable supply c. The concentration of any contaminant of concern in groundwater within the minimum or maximum setback zone of a potable water supply well will meet the applicable Tier 1 		<p>Classification by exposure pathway is no longer an option under Part 732 per the amendments just adopted by the Board.</p>
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ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
remediation objective d. Concentration of any contaminant of concern in groundwater discharging into a surface water will meet the applicable surface water quality standard per 35 Ill. Adm. Code 302			
K. Assting Documentation 1. Site map to scale oriented north showing: a. UST system(s) (former and existing) b. Excavation limits (former and existing) c. Product and dispenser lines d. Pumps and islands e. Underground utilities (sewer, gas, water, etc) f. Nearby structures (buildings, roads, etc) g. Location of the soil boring(s) h. Location of the monitoring wells i. Property boundaries j. 200-foot radius from the UST system(s) 2. Horizontal cross section showing the various geologic units and the depth to groundwater 3. Laboratory certification(s)	CAD Operator	4	Site map already prepared under Early Action. Only modifications required at this point and drawing of geologic cross section.
b. Review and certification of site classification completion report and application for payment.	LPE or LPG	2	This is provided by laboratory along with laboratory results. PM/Senior staff reference deleted. Reference to application for payment added.
5. Distribution a. Deliver draft site classification completion report and application for payment to owner/operator for review and signature b. Make copies of site classification completion report and application for payment for distribution c. Deliver completed report and application for payment to IEPA and owner/operator	Administrative Asst	2	Covers all copying and delivering costs. Reference to application for payment added.
6. Prepare applications for payment	Account Tech	8	This is added to the IPCB's proposal.

ATTACHMENT I SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work

Personnel

Hours

Comments

Section 732.845 (c)(1) Preparation and submission of low priority groundwater monitoring plan				
<p>1. Project Management</p>				<p>All Project Management work is identified under Personnel Column as PM.</p>
<p>2. Correspondence a. Correspond with Agency b. Correspond with and update client</p>				<p>2.a. already included in other line items and 2.b. is not corrective action.</p>
<p>3. Waste Disposal a. Determine treatment type to be applied to any discharge and effluent quality expected b. Obtain necessary permits for discharge c. Determine final disposition of recovered free product</p>				<p>Not required for preparation and submission of low priority groundwater monitoring plan. 3.c not applicable at low priority sites.</p>
<p>4. Technical Evaluation</p>				<p>Included in 5 below.</p>
<p>5. Plan Preparation a. Prepare groundwater monitoring plan 1. Provide information concerning: A. Site Identification B. Site Information C. Site Documentation 1. Proposed time table for well installation, all sampling events and report submittal 2. Discussion of: a. Monitoring well development procedures b. Monitoring well sampling procedures c. Activities that will be taken to prevent cross-contamination between groundwater samples 3. Site map to scale and oriented north showing: a. UST system(s) and excavation b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc.) e. Nearby structures (buildings, roads, etc.) f. Location of the soil borings</p>	<p>PM</p>	<p>8</p>		<p>Site map already prepared under Early Action. Direction of groundwater flow on Site map added to IPCC's proposal.</p>

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
g. Location of the existing monitoring wells h. Property boundaries i. Radius of 200 feet from the excavation j. Direction of groundwater flow 4. Discussion of the adequacy of the final monitoring well configuration to detect the migration of groundwater contamination			
b. Prepare budget for groundwater monitoring plan	Account Tech	4	
c. Review and certification of groundwater monitoring plan and budget	LPE or LPG	2	PM/Senior staff reference deleted.
6. Distribution	Administrative Asst	2	Covers all copying and delivering costs.
a. Deliver draft groundwater monitoring plan and budget to owner/operator for review and signature			
b. Make copies of groundwater monitoring plan and budget for distribution			
c. Deliver completed plan and budget to IEPA and owner/operator			

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work

Personnel

Hours

Comments

Scope of Work	Personnel	Hours	Comments
<p>Section 732.345 (c)(3) and (c)(4) Preparation and submission of first and second year groundwater monitoring reports</p>			<p>Hours listed are for each year's groundwater monitoring report.</p>
<p>1. Project Management</p>			<p>All Project Management work is identified under Personnel Column as PM.</p>
<p>2. Correspondence</p> <p>a. Correspond with Agency</p> <p>b. Correspond with and update client</p>			<p>2.a. already included in other line items and 2.b. is not corrective action.</p>
<p>3. Technical Evaluation</p>			<p>Included in 4 below.</p>
<p>4. Report Preparation</p> <p>a. Prepare groundwater monitoring report</p> <p>1. Provide information concerning:</p> <p>A. Site Identification</p> <p>B. Site Information</p> <p>C. Assing Documentation</p> <p>1. Description of the implementation and completion of all elements of the groundwater monitoring plan</p> <p>2. Description of the well development procedures, sample collection, preservation, and analysis</p> <p>3. Analytical results in tabular format</p> <p>4. Copies of laboratory results</p> <p>5. Laboratory certification</p> <p>6. Groundwater elevations in a tabular format</p> <p>7. Monitoring well logs</p> <p>8. Completed chain-of-custody form(s)</p> <p>9. Owner/Operator Summary form</p> <p>10. Site map to scale and oriented north showing:</p> <p>a. UST system(s) and excavation</p> <p>b. Underground utilities (sewer, gas, water, etc.)</p> <p>c. Product and dispenser lines</p> <p>d. Pumps and islands</p> <p>e. Nearby structures (buildings, roads, etc.)</p>	<p>PM CAD Operator</p>	<p>8 2</p>	<p>Site map already prepared under Early Action. Only modifications required at this point. 4.a.1.C.10.c and d added to IPCB's proposal.</p>

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
f. Location of groundwater monitoring wells g. Direction of groundwater flow h. Property boundaries i. Radius of 200 feet from the UST system	LPE or LPG	2	PM/Senior staff reference deleted. Application for payment added.
b. Review and certification of groundwater monitoring report and application for payment.	Administrative Asst	2	Covers all copying and delivering costs. Application for payment added.
5. Distribution a. Deliver draft groundwater monitoring report and application for payment to owner/operator for review and signature b. Make copies of groundwater monitoring report and application for payment for distribution c. Deliver completed report and application for payment to IEPA and owner/operator	Account Tech	4	This is added to IFCB's proposal.
6. Prepare application for payment			

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work

Personnel

Hours

Comments

Section 732.845(c)(5) Preparation and submission of low priority groundwater monitoring completion report				
<p>1. Project Management</p>				<p>All Project Management work is identified under Personnel Column as PM.</p>
<p>2. Correspondence a. Correspond with Agency b. Correspond with and update client</p>				<p>2.a. already included in other line items and 2.b. is not corrective action.</p>
<p>3. Technical Evaluation</p>				<p>Included in 4 below.</p>
<p>4. Report Preparation a. Prepare groundwater monitoring completion report 1. Provide information concerning: A. Site Identification B. Site Information C. Assing Documentation 1. Description of the implementation and completion of all elements of the groundwater monitoring plan 2. Description of the well development procedures, sample collection, preservation, and analysis 3. Analytical results in tabular format 4. Copies of laboratory results 5. Laboratory certification 6. Groundwater elevations in a tabular format 7. Monitoring well logs 8. Completed chain-of-custody form(s) 9. Owner/Operator Summary form 10. Site map to scale and oriented north showing: a. UST system(s) and excavation b. Underground utilities (sewer, gas, water, etc.) c. Product and dispenser lines d. Pumps and islands e. Nearby structures (buildings, roads, etc.) f. Location of groundwater monitoring wells</p>	<p>PM CAD Operator</p>	<p>8 2</p>		<p>Site map already prepared under Early Action. Only modifications required at this point. 4.a.1.C.10.c and d added to IPCB's proposal.</p>

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
g. Direction of groundwater flow h. Property boundaries i. Radius of 200 feet from the UST system	LPE or LPG	2	PM/Senior staff reference deleted. Application for payment added.
b. Review and certification of groundwater monitoring completion report and application for payment.	Administrative Asst	2	Covers all copying and delivering costs. Application for payment added.
5. Distribution	Account Tech	4	This is added to IPCB's proposal.
a. Deliver draft groundwater monitoring completion report and application for payment to owner/operator for review and signature			
b. Make copies of groundwater monitoring completion report and application for payment for distribution			
c. Deliver completed report and application for payment to IEPA and owner/operator			
6. Prepare applications for payment			

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work Personnel Hours Comments

<p>Section 732.845(d)(1)(A) Preparation and submission of investigation plans for on-site contamination for sites classified pursuant to Section 732.307</p>			<p>Scope of work same as for Stage 2 site investigations under Part 734. All scope of work for this Section 732.845(d)(1)(A) added to IPCB's proposal.</p>
<p>1. Technical Evaluation a. Address the same items that are required for Part 734 sites under 35 IAC 734.320(b) b. Prepare or finalize field notes c. Prepare and describe site investigation photos d. Prepare contingency scope of work for boring/monitoring well locations</p>	<p>PM CAD Operator</p>	<p>16 8</p>	<p>These hours cover technical work performed (vs. report preparation hours which are included under 2 below).</p>
<p>2. Plan Preparation a. Prepare investigation plan for on-site contamination 1. Provide information concerning: A. Site Identification B. Site Information 1. Will owner/operator seek reimbursement from the UST Fund? 2. If yes, is budget attached? 3. Is this an amended plan? 4. Identify the material released 5. Describe the activities that will be performed to determine the following: a. Degree of soil contamination b. Extent of soil contamination (as defined to Tier 1 Residential remediation objectives) c. The degree of groundwater contamination d. Extent of groundwater contamination (as defined to Class 1 Remediation Objectives unless otherwise approved by the Illinois EPA) e. Direction of groundwater flow f. Hydraulic conductivity of groundwater g. Identification of Site features that may affect contaminant transport and risk to human health and the environment. h. The following parameters, if determined during on-site investigation: Hydraulic conductivity Soil bulk density Soil particle density</p>	<p>PM</p>	<p>8</p>	<p>Included under 2 below.</p>

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
Moisture content Organic carbon content C. Site Investigation Summary Form 6. Site map to scale and oriented north showing:			Maps included under 1.a. above. Site map already prepared under Early Action. Only modifications required at this point.
a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc) e. Nearby structures (buildings, roads, etc.) f. Location of the proposed/existing soil borings g. Location of the proposed/existing monitoring wells h. Property boundaries			
b. Prepare budget	Account Tech	4	
c. Review and certification of on-site investigation plan and budget	LPE/LPG	2	
3. Resource Coordination	PM	2	
a. Arrange for drilling			
b. Call J.U.L.I.E. and/or municipality to locate utilities			
4. Distribution	Administrative Asst	2	Covers all copying and delivering costs.
a. Deliver draft plan and budget to owner/operator for review and signature			
b. Make copies of plan and budget for distribution			
c. Deliver completed plan and budget to IEPA and owner/operator			

ATTACHMENT I SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work

Personnel

Hours

Comments

Scope of Work	Personnel	Hours	Comments
<p>Section 732.845(d)(1)(B) Preparation and investigation plans for off-site contamination for sites classified pursuant to Section 732.307</p>			Scope of work same as for Stage 3 site investigations under Part 734. All scope of work for this Section 732.845(d)(1)(B) added to IPCB's proposal.
<p>1. Technical Evaluation</p> <ul style="list-style-type: none"> a. Address the same items that are required for Part 734 sites under 35 IAC 734.325(b) b. Prepare or finalize field notes c. Prepare and describe site investigation photos d. Prepare contingency scope of work for boring/monitoring well locations. 	PM CAD Operator	16 8	These hours cover technical work performed (vs. report preparation hours which are included under 2 below). Included under 2 below.
<p>2. Plan Preparation</p> <ul style="list-style-type: none"> a. Prepare investigation plan for off-site contamination <ul style="list-style-type: none"> 1. Provide information concerning: <ul style="list-style-type: none"> A. Site Identification B. Site Information <ul style="list-style-type: none"> 1. Will owner/operator seek reimbursement from the UST Fund? 2. If yes, is budget attached? 3. Is this an amended plan? 4. Identify the material released 5. Describe the activities that will be performed to determine the following: <ul style="list-style-type: none"> a. Degree of soil contamination b. Extent of soil contamination (as defined to Tier 1 Residential remediation objectives) c. The degree of groundwater contamination d. Extent of groundwater contamination (as defined to Class 1 Remediation Objectives unless otherwise approved by the Illinois EPA) e. Direction of groundwater flow f. Hydraulic conductivity of groundwater g. Identification of Site features that may affect contaminant transport and risk to human health and the environment. h. The following parameters, if determined during off-site investigation: <ul style="list-style-type: none"> Hydraulic conductivity Soil bulk density Soil particle density 	PM	8	

ATTACHMENT I SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
Moisture content Organic carbon content			
C. Site Investigation Summary Form			
6. Site map to scale and oriented north showing: a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc) e. Nearby structures (buildings, roads, etc.) f. Location of the proposed/existing soil borings g. Location of the proposed/existing monitoring wells h. Property boundaries			Maps included under 2.a. above. Site map already prepared under Early Action. Only modifications required at this point.
b. Prepare budget	Account Tech	4	
c. Review and certification of off-site investigation plan and budget	LPE/LPG	2	
3. Resource Coordination	PM	2	
a. Arrange for drilling b. Call J.U.L.I.E. and/or municipality to locate utilities			
4. Distribution	Administrative Asst	2	Covers all copying and delivering costs.
a. Deliver draft plan and budget to owner/operator for review and signature b. Make copies of plan and budget for distribution c. Deliver completed plan and budget to IEPA and owner/operator			
5. Off-site access Correspondence and meetings with off-site property owners	PM	4	4 hours total for each off-site property
Section 732.945(d)(3) Well surveys conducted pursuant to Sections 732.404(e)(1) and 734.445(b)			
	PM	4	Not required for all sites.

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work

Personnel

Hours

Comments

Section 732.845(d)(4) Preparation and submission of corrective action plan (Conventional Tech)				
1. Project Management				All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with Agency b. Correspond with and update client				2.a. already included in other line items and 2.b. is not corrective action.
3. Waste Disposal a. Prepare waste profile (arrange for landfill approval)	Tech	4		These hours include field work that is not covered under the half-day rates.
b. Determine limits of excavation c. Estimate quantity of contaminated soil to be disposed of d. Mail waste profile to owner/operator for review and signature	PM	4		
c. Prepare waste manifests or tracking forms				Included in 3 b above
4. Technical Evaluation a. Estimate quantity of "clean" overburden to be stockpiled (if any). b. Prepare or finalize field notes c. Prepare and describe remediation photos				This work part of preparation and submission of Corrective Action Completion Report. (see items 4.b and c. under scope of work for Section 732.845(d)(8)).
5. Plan Preparation a. Prepare or review site health and safety plan b. Prepare Corrective Action Plan				Previously prepared under 732.845(a)(1), item 4a.
1. Provide information concerning: A. Site Identification B. Site Information C. Proposed Methods of Remediation D. Soil and Groundwater Investigation Results	PM CAD Operator	2 2		Site map already prepared under Early Action. Only modifications required at this point.
1. Description of investigation activities performed to define the extent of soil and/or groundwater contamination 2. Analytical results and cleanup objectives in tabular format				

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
3. Laboratory results 4. Boring logs 5. Monitoring well logs 6. Site maps to scale and oriented north showing: a. Soil sample locations b. Monitoring well locations c. Plumes of soil and groundwater contamination			
E. Technical Information – Corrective Action Plan 1. Discussion of how the corrective action plan shall remediate the release 2. List of sampling parameters and corresponding remediation objectives 3. Basis for determining sampling parameters and remediation objectives 4. Media sampling plan to verify completion of remediation 5. Current and future use of the property 6. Proposed preventive, engineering and institutional controls 7. Schedule for implementation and projected completion of the plan 8. Engineering design specifications, diagrams, calculations, manufacturer's specifications, systems analyses, site maps, etc.	PM	16	
c. Prepare budget for corrective action plan d. Review and certification of corrective action plan and budget	Account Tech LPE or LPG	8 4	PM/Senior staff reference deleted.
6. Resource Coordination a. Schedule project b. Arrange for subcontractors c. Call J.U.L.E. and/or municipality to locate utilities	PM	16	Reference to individual subcontracted activities changed to "subcontractors."
7. Distribution a. Deliver draft corrective action plan and budget to owner/operator for review and signature b. Make copies of corrective action plan and budget for distribution c. Deliver completed corrective action plan and budget to IEPA and owner/operator	Administrative Asst	2	Covers all copying and delivering costs.
Section 732.845(d)(6)(B) Development of Tier 2 or Tier 3 remediation objectives			
	PM	8	

ATTACHMENT 1 SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
Section 732.845(d)(7) Environmental Land Use Controls and Highway Authority Agreements	PM	8	8 hours total for each ELUC & HAA. Standardized documents being proposed in separate TACO rulemaking.

ATTACHMENT I SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work Personnel Hours Comments

<p>Section 732.845(d)(8) Preparation and submission of corrective action completion report</p>			<p>These tasks apply to Corrective Action Completion Reports for both conventional and alternative technologies. IPCB's proposal referenced only conventional technologies.</p>
<p>1. Project Management</p>			<p>All Project Management work is identified under Personnel Column as PM.</p>
<p>2. Correspondence a. Correspond with Agency b. Correspond with and update client</p>			<p>2.a. already included in other line items and 2.b. is not corrective action.</p>
<p>3. Records Gathering a. Obtain legal description of property b. Obtain property tax identification number</p>			<p>Included in hours for preparation of Corrective Action Completion Report.</p>
<p>4. Technical Evaluation a. Address items in 35 IAC 734.345(a)? b. Prepare and describe photos c. Prepare or finalize field notes</p>			<p>Included in 5 below.</p>

ATTACHMENT I SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
<p>5. Report Preparation</p> <p>a. Prepare Corrective Action Completion Report following items in 35 IAC 734.345(a)</p> <p>1. Provide information concerning:</p> <p>a. Site Identification</p> <p>b. Site Information</p> <p>c. Completion Information</p> <p>1. Chronological narrative of corrective action activities</p> <p>2. Explanation of how the corrective action activities remediated the release</p> <p>3. Discussion of how the remediation objectives were determined</p> <p>4. Media sampling and analytical procedures to verify completion of remediation</p> <p>5. Analytical results and remediation objectives in tabular format</p> <p>6. Laboratory results</p> <p>7. Soil boring logs</p> <p>8. Monitoring well logs</p> <p>9. Laboratory certification</p> <p>10. Applicable Professional Engineer Certification</p> <p>11. Site maps to scale and oriented north showing:</p> <p>a. Final soil sample locations demonstrating completion of remediation</p> <p>b. Groundwater monitoring well locations</p> <p>c. Groundwater recovery/discharge points</p> <p>d. Plume of contamination as defined by laboratory analyses and</p> <p>e. Area remediated</p> <p>12. Property Owner Summary</p> <p>13. Photographs documenting corrective action activities</p>	<p>PM</p> <p>CAD Operator</p>	<p>32</p> <p>8</p>	<p>Professional engineer certification included under 5.b. below.</p> <p>Site map already prepared under Early Action. Only modifications required at this point.</p>
<p>b. Review and certification of corrective action completion report and application for payment.</p>	LPE	4	PM/Senior staff reference deleted. Reference to applications for payment added.
<p>6. Resource Coordination</p> <p>a. Record NFR letter</p>	Administrative Asst	2	
<p>7. Distribution</p> <p>a. Deliver draft corrective action completion report and application for payment to owner/operator for review and signature</p> <p>b. Make copies of corrective action completion report and application for payment for distribution</p>	Administrative Asst	3	Covers all copying, delivering costs and recording of NFR letter. References to applications for payment added.

ATTACHMENT I SCOPES OF WORK FOR PART 732 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
c. Deliver completed corrective action completion report and application for payment to IEPA and owner/operator			
d. Make copies of recorded NFR letter for distribution			
e. Deliver recorded NFR letter to IEPA and owner/operator	Account Tech	8	This is added to IPCB's original proposal.
8. Prepare applications for payment			
732.845(f) Amendment of plan due to unforeseen circumstances and its associated budget	PM	6	
	Account Tech	2	

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Comments

Hours

Personnel

Scope of Work

Scope of Work	Personnel	Hours	Comments
Section 734.845(a)(1) Preparation for the abandonment or removal of USTs			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Office of the Illinois State Fire Marshal (OSFM) 1. Prepare and submit initial Notification Form for Underground Storage Tanks 2. Prepare Application for Permit for Removal/Abandonment of Underground Storage Tanks and submit to owner/operator for signature 3. Submit Application for Permit for Removal/Abandonment to OSFM 4. Prepare and submit LUST Fund Eligibility and Deductibility Application 5. Prepare and submit amended Notification Form b. Illinois Environmental Protection Agency (IEPA) 1. Prepare and submit early action extension 2. Follow up c. Correspond with and update client	Tech PM PM	2.a.1, 2, 3 & 5 are performed by tank removal contractor and included in tank removal lump sum. Not required in all cases. Not corrective action.	
3. Waste Disposal a. Determine early action excavation limits b. Prepare waste profile and arrange for landfill approval	Tech	4	These hours include field work that is not covered under the half-day rates.
4. Plan and Report Preparation a. Prepare waste manifests or tracking forms a. Prepare site health and safety plan	PM PM	1 2	
5. Resource Coordination a. Arrange for subcontractors (e.g., excavator, tank removal contractor, backfill, landfill) b. Schedule project c. Call J.U.L.I.E. and/or municipality to locate utilities	PM	4	Task performed by tank removal contractor. Cost included in tank removal lump sum.

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Comments

Hours

Personnel

Scope of Work

Scope of Work	Personnel	Hours	Comments
Section 734.845(a)(3) Preparation and submission of 20-day and 45-day reports			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with Agency b. Correspond with and update client			2.a. already included in other line items and 2.b. is not corrective action.
3. Records Gathering a. Obtain and review IEPA and/or OSFM records b. Obtain and review well records from ISGS and ISWS c. Obtain and review local information (e.g. Sanborn maps, aerial overlays)			3.a. and c included in hours for preparation of 45-day Report. 3.b. not required for preparation of 20 or 45-day Reports.
4. Waste Disposal a. Review disposal documentation	PM	1	
5. Technical Evaluation a. Prepare well location map (<25 records within 2500 feet) b. Determine expected local site geology (subsurface soil conditions) c. Site visit for preparation of 20 and 45 Day reports	PM	6	a. not required for preparation of 20 or 45-day Reports. b. included in hours for preparation of 45-day Report. c. includes field work that is not covered under the half-day rates.
6. Plan and Report Preparation a. Prepare 20-day Certification b. Prepare or revise site health and safety plan	PM	1	Previously prepared under 734.845(a)(1) task 4a. No revision necessary for preparation and submission of 20 and 45-day reports.

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
<p>c. Prepare 45-day Report</p> <ol style="list-style-type: none"> 1. Provide information pertaining to: <ol style="list-style-type: none"> A. Site Identification B. Release Information C. Early Action D. Site Information <ol style="list-style-type: none"> 1. Nature and estimated quantity of release 2. Data concerning: <ol style="list-style-type: none"> a. Surrounding populations b. Water quality c. Use and approximate locations of wells potentially affected by the release d. Subsurface soil conditions e. Location of subsurface sewers f. Climatological conditions g. Land use 3. A discussion of what was done to measure for the presence of a release 4. Action taken to prevent further release of the regulated substance into the environment 5. A discussion of the action taken to monitor and mitigate fire and safety hazards posed by vapors of free product that has migrated from the UST excavation zone and entered subsurface structures 	PM	8	
<p>E. Assting Document</p> <ol style="list-style-type: none"> 1. Site map to scale and oriented north showing: <ol style="list-style-type: none"> a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc.) e. Nearby structures (buildings, roads, etc.) f. Soil boring(s) (if present) g. Monitoring well(s) and/or sumps (if present) h. Property boundaries i. Sample location points 2. Area map showing the site in relation to surrounding properties. This map should identify the facilities on the surrounding properties 3. Cross-section, to scale, showing the USTs and the excavation 4. Analytical/screening results in tabular format, including the results of soil samples required 	CAD Operator	8	
	PM	2	

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
pursuant to 35 Ill. Adm. Code 732.202(h) or 45 ILCS 5/57-57.17.			
5. UST information in a tabular format, including:			UST information table included on Agency forms under 6.c.1.B. above (Release Information)
a. Total number of UST(s) on site	Administrative	1	6, 8 & 9 combined for a total of 1 hour.
b. Volume of the UST(s) (in gallons)	Asst PM	1	
c. The material stored in the UST(s)			6, 8 & 9 combined for a total of 1 hour.
d. Identification of UST system(s) that had a release			Certification added to IPCB's proposal. PM/Senior staff reference deleted. Added references to application for payment.
e. Identification of UST system(s) that were repaired, removed, or abandoned in-place	LPE or LPG	1	Already done prior to tank removal. Not required for preparation and submission of 20 and 45-day reports.
6. Copy of OSFM Permits or notifications	Administrative	2	Covers all-copying and delivering costs. Added references to application for payment.
7. Narrative of tank removal and cleaning operations; describe how wastes generated during the tank removal were managed, treated, and disposed of	Asst		This is added to IPCB's proposal.
8. Photographs of UST removal activities and the excavation			
9. Copies of waste manifests for soil and groundwater transported off-site			
d. Review and certification of 20-Day and 45-Day Reports and application for payment.			
7. Resource Coordination			
a. Call J.U.L.I.E. and/or municipality to locate utilities	Administrative	8	
8. Distribution	Asst		
a. Deliver draft 20-day Certification and 45-Day Report and application for payment to owner/operator for review and signature			
b. Make copies of 20-Day Certification and 45-Day Report and application for payment for distribution	Account Tech		
c. Deliver completed 20-Day Certification and 45-Day Report and application for payment to IEPA and owner/operator			
9. Prepare application for payment			

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work

Personnel Hours Comments

Section 734.845(a)(6) Preparation and submission of free product removal reports	Personnel	Hours	Comments
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with and update Illinois Environmental Protection Agency (IEPA) b. Correspond with and update Client			2.a. already included in other line items and 2.b. is not corrective action.
3. Waste Disposal a. Review disposal documentation	PM	1	
4. Free Product Report Preparation a. Prepare Free Product Removal Report 1. Provide information pertaining to: A. Site Identification B. Free Product Information 1. Name(s) of person(s) responsible for implementing the free product removal measures 2. Estimated quantity, type, and thickness of free product observed or measured in boreholes, wells, excavation, etc. 3. The type of free product recovery system used and technical justification for the method of recovery chosen 4. Whether any discharge will take place on- or off-site during the recovery operation and where this discharge (point) will be located 5. Type of treatment applied to (the free product), and the effluent quality expected from any discharge 6. Steps that have been taken or that are being taken to obtain necessary permits for any discharge 7. The disposition of the recovered free product.	PM	4	

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
<p>C. Assisting Documentation</p> <ol style="list-style-type: none"> 1. Site map to scale and oriented north showing: <ol style="list-style-type: none"> a. UST system(s) and excavation limits; b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc.) e. Nearby structures (buildings, roads, etc.) f. Soil boring(s) (if present) g. Monitoring well(s) and/or sumps (if present) h. Locations where free product was encountered including its estimated thickness i. Location of recovery points j. Location of the treatment unit k. Location of discharge points l. Property boundaries 	CAD Operator	1	Site map already prepared under Early Action. Only modifications required at this point.
<ol style="list-style-type: none"> 2. Table showing the dates that free product recovery was conducted and the amount of free product recovered on each date 	PM	1	
<ol style="list-style-type: none"> 3. Copies of waste manifests 	Administrative Asst	1	
<ol style="list-style-type: none"> 5. Review and certification of free product removal report. 	LPE or LPG	1	Added to IPCB's proposal.
<ol style="list-style-type: none"> 6. Distribution <ol style="list-style-type: none"> a. Deliver draft free product removal report to owner/operator for review and signature b. Make copies of free product removal report for distribution c. Deliver completed report to IEPA and owner/operator 	Administrative Asst	2	Covers all copying and delivering costs.
<p>Section 734.845(a)(7) Preparation and submission of reports submitted pursuant to Section 734.210(b)(3)</p> <ol style="list-style-type: none"> 1. Site characterization/narrative 2. Characterization/narrative of water encountered in UST excavation 3. Completion of Property Owner Summary Form 4. Recording NFR Letter Early Action Completion Report 	PM Admin Asst	2 2	This report submitted as part of 45-day Report. All other costs related to this report are included in costs for 45-day Report (e.g., LPG/LPE certification, distribution).

ATTACHMENT 2 SCOPIES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
<p>Section 734.845(b)(1) Preparation and submission of stage 1 site investigation plan</p>			
<p>1. Project Management</p>			<p>All Project Management work is identified under Personnel Column as PM. 2.a. already included in other line items and 2. b. is not corrective action.</p>
<p>2. Correspondence</p> <p>a. Correspond with Agency</p> <p>b. Correspond with and update client</p>			
<p>3. Technical Evaluation</p> <p>a. Determine expected local site geology (subsurface soil conditions)</p> <p>b. Evaluate backfill/piping samples to Tier 1 remediation objectives.</p> <p>c. Determine drilling locations for soil samples and monitoring wells</p> <p>d. Demonstrate if groundwater investigation is required (if applicable)</p> <p>e. Conduct initial water supply well survey per 734.315(a)(3)</p>	<p>PM</p>	<p>8</p>	
<p>4. Plan Preparation</p> <p>a. Prepare Stage 1 Site Investigation Plan</p> <p>1. Provide information concerning:</p> <p>A. Site Identification</p> <p>B. Site Information</p> <p>1. Will owner/operator seek reimbursement from the UST Fund?</p> <p>2. If yes, is budget attached?</p> <p>3. Is this an amended plan?</p> <p>4. Identify the material released</p> <p>5. Describe the activities that will be performed to determine the following:</p> <p>a. Degree of soil contamination</p> <p>b. Extent of soil contamination (as defined to Tier 1 Residential remediation objectives)</p> <p>c. The degree of groundwater contamination</p> <p>d. Extent of groundwater contamination (as defined to Class 1 Remediation Objectives unless otherwise approved by the Illinois EPA)</p> <p>e. Direction of groundwater flow</p> <p>f. Hydraulic conductivity of groundwater</p> <p>g. Identification of Site features that may affect contaminant transport and risk to human health and the environment</p> <p>6. Site map to scale and oriented north showing:</p>			<p>No preparation of plan is required. Stage 1 Plan consists of a certification in the 45-day Report that the Stage 1 investigation will be conducted in accordance with 35 IAC 734.315 (Stage 1 site investigation requirements).</p>

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
<ul style="list-style-type: none"> a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc) e. Nearby structures (buildings, roads, etc.) f. Location of the proposed/existing soil borings g. Location of the proposed/existing monitoring wells h. Property boundaries 			Previously prepared under 734.845(a)(1) task 4a. Not required for preparation and submission of Stage 1 plan.
<ul style="list-style-type: none"> b. Prepare or update site health and safety plan 			No preparation of budget is required. Stage 1 Budget consists of a certification in the 45-day Report that the Stage 1 investigation costs will not exceed the cost set forth in Subpart H.
<ul style="list-style-type: none"> c. Prepare budget 			Stage 1 plan submitted as part of 45-day Report. Review and certification costs included under 45-day Report review and certification costs.
<ul style="list-style-type: none"> d. Review work to be done by project manager or other senior staff e. Prepare LPE/LPG certification 			
<ul style="list-style-type: none"> 5. Resource Coordination <ul style="list-style-type: none"> a. Arrange for drilling b. Call J.U.L.I.E. and/or municipality to locate utilities 	PM	2	
<ul style="list-style-type: none"> 6. Distribution <ul style="list-style-type: none"> a. Deliver draft plan and budget to owner/operator for review and signature b. Make copies of plan and budget for distribution c. Deliver completed plan and budget to Agency and owner/operator 			Stage 1 Plan submitted as part of 45-day Report. These costs included under 45-day Report costs.

ATTACHMENT 2 SCOPE OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
Section 734.845(b)(3) Preparation and submission of stage 2 site investigation plan			
1. Project Management			All Project Management work is identified under Personnel Column as PM.
2. Correspondence a. Correspond with Agency b. Correspond with and update client			2.a. already included in other line items and 2.b. is not corrective action.
3. Records Gathering a. Obtain local information (e.g., Sanborn maps, aerial overlays, etc.) b. Determine extent of property boundaries			These tasks already performed as part of 45-day Report preparation.
4. Technical Evaluation a. Address items in 35 IAC 734.320(b) b. Prepare or finalize field notes c. Prepare and describe site investigation photos d. Prepare contingency scope of work for boring/monitoring well locations	PM CAD Operator	16 8	These hours cover technical work performed (vs. report preparation hours which are included under 5 below).
5. Plan Preparation a. Prepare Stage 2 Site Investigation Plan addressing items in 35 IAC 734.320(b) 1. Provide information concerning: A. Site Identification B. Site Information 1. Will owner/operator seek reimbursement from the UST Fund? 2. If yes, is budget attached? 3. Is this an amended plan? 4. Identify the material released 5. Describe the activities that will be performed to determine the following: a. Degree of soil contamination b. Extent of soil contamination (as defined to Tier 1 Residential remediation objectives) c. The degree of groundwater contamination d. Extent of groundwater contamination (as defined to Class 1 Remediation Objectives unless otherwise approved by the Illinois EPA) e. Direction of groundwater flow f. Hydraulic conductivity of groundwater g. Identification of Site features that may affect contaminant transport and risk to human	PM	8	Included under 5 below. 5.a.1.B.5.h and 5.a.1.C added to Board's proposal

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
health and the environment. h. The following parameters, if determined during Stage 2 investigation: Hydraulic conductivity Soil bulk density Soil particle density Moisture content Organic carbon content C. Site Investigation Summary Form			
6. Site map to scale and oriented north showing: a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc) e. Nearby structures (buildings, roads, etc.) f. Location of the proposed/existing soil borings g. Location of the proposed/existing monitoring wells h. Property boundaries	Account Tech	4	Maps included under 4.a. above. Site map already prepared under Early Action. Only modifications required at this point.
b. Prepare budget			Previously prepared under 734.845(a)(1) task 4a.
c. Prepare or review site health and safety plan			PM/Senior staff reference deleted. Added reference to application for payment.
d. Review and certification of Stage 2 Site Investigation Plan, Budget, and Stage 1 application for payment.	LPE/LPG	2	
6. Resource Coordination	PM	2	
a. Arrange for drilling			
b. Call J.U.L.I.E. and/or municipality to locate utilities			
7. Distribution	Administrative Asst	2	Covers all copying and delivering costs. Added references to application for payment.
a. Deliver draft plan and budget and application for payment to owner/operator for review and signature			
b. Make copies of plan and budget and application for payment for distribution			
c. Deliver completed plan and budget and application for payment to IEPA and owner/operator			
8. Prepare Stage 1 applications for payment	Account Tech	8	This is added to IPCB's proposal.

ATTACHMENT 2 SCOPE OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Comments

Hours

Personnel

Scope of Work

Scope of Work	Personnel	Hours	Comments
<p>734.845(b)(5) Preparation and submission of stage 3 site investigation plan</p>			<p>The following hours are proposed in lieu of time and materials for Stage 3 Site Investigation.</p>
<p>1. Records Gathering a. Obtain local information (e.g., Sanborn maps, aerial overlays, etc.) b. Determine extent of property boundaries</p>			<p>These tasks are already performed as part of 45-day Report preparation.</p>
<p>2. Technical Evaluation a. Address items in 35 IAC 734.325(b) b. Prepare or finalize field notes c. Prepare and describe site investigation photos d. Prepare contingency scope of work for boring/monitoring well locations.</p>	<p>PM CAD Operator</p>	<p>16 8</p>	<p>These hours cover technical work performed (vs. report preparation hours which are included under 3 below).</p>
<p>3. Plan Preparation a. Prepare Stage 3 Site Investigation Plan addressing items in 35 IAC 734.325(b) I. Provide information concerning: A. Site Identification B. Site Information 1. Will owner/operator seek reimbursement from the UST Fund? 2. If yes, is budget attached? 3. Is this an amended plan? 4. Identify the material released 5. Describe the activities that will be performed to determine the following: a. Degree of soil contamination b. Extent of soil contamination (as defined to Tier 1 Residential remediation objectives) c. The degree of groundwater contamination d. Extent of groundwater contamination (as defined to Class 1 Remediation Objectives unless otherwise approved by the Illinois EPA) e. Direction of ground-water flow f. Hydraulic conductivity of groundwater g. Identification of Site features that may affect contaminant transport and risk to human health and the environment. h. The following parameters, if determined during Stage 3 investigation: Hydraulic conductivity</p>	<p>PM</p>	<p>8</p>	<p>Included under 3 below.</p>

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
Soil bulk density Soil particle density Moisture content Organic carbon content C. Site Investigation Summary Form			
6. Site map to scale and oriented north showing: a. USF system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc) e. Nearby structures (buildings, roads, etc.) f. Location of the proposed/existing soil borings g. Location of the proposed/existing monitoring wells h. Property boundaries			Maps included under 4.a. above. Site map already prepared under Early Action. Only modifications required at this point.
b. Prepare budget	Account Tech	4	
c. Review and certification of Stage 3 Site Investigation Plan and Budget and Stage 2 application for payment.	LPE/LPG	2	
4. Resource Coordination	PM	2	
a. Arrange for drilling			
b. Call J.U.L.I.E. and/or municipality to locate utilities			
5. Distribution	Administrative Asst	2	Covers all copying and delivering costs.
a. Deliver draft plan and budget and application for payment to owner/operator for review and signature			
b. Make copies of plan and budget and application for payment for distribution			
c. Deliver completed plan and budget and application for payment to IEPA and owner/operator	PM	4	4 hours total for each off-site property
6. Off-site access			
Correspondence and meetings with off-site property owners			
7. Prepare Stage 2 applications for payment	Account Tech	8	
Section 734.845(b)(7) Well surveys conducted pursuant to Section 734.445(b)	PM	4	Not required for all sites
Section 734.845(b)(8) Preparation and submission of site investigation completion report			
1. Project Management			All Project Management work is identified under Personnel Column as PM.

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
<p>2. Correspondence</p> <ul style="list-style-type: none"> a. Correspond with Agency b. Correspond with and update client 			<p>2.a. already included in other line items and 2.b. is not corrective action.</p>
<p>3. Records Gathering</p> <ul style="list-style-type: none"> a. Obtain local information (e.g., Sanborn maps, aerial overlays, etc.) b. Determine extent of property boundaries 			<p>These tasks are already performed as part of 45-day Report preparation.</p>
<p>4. Technical evaluation</p> <ul style="list-style-type: none"> a. Address items in 35 IAC 734.330(a)(b) and (c) c. Describe methods for investigating site and surrounding areas. d. Describe the observations made while investigating site and surrounding areas e. Prepare or revise site maps per 35 IAC 734.330(b)(2)-(4) that also show: <ul style="list-style-type: none"> 1. Distance of at least 1,000 feet around UST (scale > 1:200) 2. Location of site with respect to section, township and range 3. On-site and off-site injection and withdrawal wells affected by release f. Evaluate existing and potential migration pathways and exposure routes g. Compile information regarding site-specific sampling activities and methods, including: <ul style="list-style-type: none"> 1. Sample collection information (date, time, method, location, sampler) 2. Sample preservation and shipment information, including QA/QC 3. Field and lab blank documentation h. Interpret the results of the site investigation i. Describe the release and evaluation exposure routes j. Describe the nature, concentration and extent of indicator contaminants k. Prepare or finalize field notes l. Prepare and describe site investigation photos m. Provide analysis of hydraulic conductivity test data from a single well n. Provide description of physical features that may affect contaminant transport 	<p>PM</p>	<p>16</p>	
<p>5. Report Preparation</p> <ul style="list-style-type: none"> a. Prepare Site Investigation Completion Report addressing items in 35 IAC 734.330(a)(b) and (c) <ul style="list-style-type: none"> 1. Provide information concerning: <ul style="list-style-type: none"> A. Site Identification B. Site Information C. Site Investigation Results <ul style="list-style-type: none"> 1. Site History/Executive Summary 2. Narrative of field activities including sampling methods 3. Discussion of development of remediation objectives 	<p>PM CAD Operator</p>	<p>4 4</p>	<p>Site map already prepared under Early Action. Only modifications required at this point. Site Investigation Summary Form added to IPCB's proposal.</p>

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
4. Analytical results and remediation objectives in tabular format 5. Conclusions 6. Site maps to scale a. UST system(s) and excavation limits b. Product and dispenser lines c. Pumps and islands d. Underground utilities (sewer, gas, water, etc) e. Nearby structures (buildings, roads, etc.) f. Location of the soil borings g. Location of the existing monitoring wells h. Property boundaries 7. Soil boring logs 8. Well completion reports 9. Laboratory Reports and 10. Laboratory Certification D. Site Investigation Summary Form			
b. Prepare appendices containing references and data sources, log, lab reports, etc.	LPE or LPG	2	Included in 4 and 5.a above. PM/Senior staff reference deleted. Reference to application for payment added.
c. Review and certification of site investigation completion report and Stage 3 application for payment.	Administrative Asst	2	Covers all copying and delivering costs. Reference to application for payment added.
6. Distribution a. Deliver draft site investigation completion report and application for payment to owner/operator for review and signature b. Make copies of site investigation completion report and application for payment for distribution c. Deliver completed report and application for payment to IEPA and owner/operator	Account Tech	8	This is added to IPCB's proposal.
7. Prepare Stage 3 applications for payment			
Section 734.845 (c) (1) Preparation and submission of corrective action plan (Conventional Tech)			
1. Project Management			All Project Management work is identified under Personnel Column as PM.

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
b. Monitoring well locations c. Plumes of soil and groundwater contamination E. Technical Information – Corrective Action Plan 1. Discussion of how the corrective action plan shall remediate the release 2. List of sampling parameters and corresponding remediation objectives 3. Basis for determining sampling parameters and remediation objectives 4. Media sampling plan to verify completion of remediation 5. Current and future use of the property 6. Proposed preventive, engineering and institutional controls 7. Schedule for implementation and projected completion of the plan 8. Engineering design specifications, diagrams, calculations, manufacturer's specifications, systems analyses, site maps, etc. c. Prepare budget for corrective action plan d. Review and certification of corrective action plan and budget	PM	16	
c. Prepare budget for corrective action plan d. Review and certification of corrective action plan and budget	Account Tech LPE or LPG	8 4	PM/Senior staff reference deleted. Reference to individual subcontracted activities changed to "subcontractors."
6. Resource Coordination a. Schedule project b. Arrange for subcontractors c. Call J.U.L.I.E. and/or municipality to locate utilities	PM	16	
7. Distribution a. Deliver draft corrective action plan and budget to owner/operator for review and signature. b. Make copies of corrective action plan and budget for distribution. c. Deliver completed corrective action plan and budget to IEPA and owner/operator.	Administrative Asst.	2	Covers all copying and delivering costs.

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Comments

Hours

Personnel

Scope of Work

<p>Section 734.345(c)(3) Environmental Land Use Controls and Highway Authority Agreements</p>	<p>PM</p>	<p>8</p>	<p>8 hours total for each ELUC & HAA. Standardized documents being proposed in separate TACO rulemaking.</p>
<p>Section 734.345(c)(4) Preparation and submission of corrective action completion report</p>			<p>These tasks apply to Corrective Action Completion Reports for both conventional and alternative technologies. IPCB's proposal referenced only conventional technologies.</p>
<p>1. Project Management</p>			<p>All Project Management work is identified under Personnel Column as PM.</p>
<p>2. Correspondence</p>			<p>2.a. already included in other line items and 2.b. is not corrective action.</p>
<p>a. Correspond with Agency b. Correspond with and update client</p>			<p>Included in hours for preparation of Corrective Action Completion Report.</p>
<p>3. Records Gathering</p>			<p>Included in 5 below.</p>
<p>a. Obtain legal description of property b. Obtain property tax identification number</p>			
<p>4. Technical Evaluation</p>			
<p>a. Address items in 35 IAC 734.345(a)? b. Prepare and describe photos c. Prepare or finalize field notes</p>			

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work	Personnel	Hours	Comments
<p>5. Report Preparation</p> <p>a. Prepare Corrective Action Completion Report following items in 35 IAC 734.345(a)</p> <p>1. Provide information concerning:</p> <p>a. Site Identification</p> <p>b. Site Information</p> <p>c. Completion Information</p> <p>1. Chronological narrative of corrective action activities</p> <p>2. Explanation of how the corrective action activities remediated the release</p> <p>3. Discussion of how the remediation objectives were determined</p> <p>4. Media sampling and analytical procedures to verify completion of remediation</p> <p>5. Analytical results and remediation objectives in tabular format</p> <p>6. Laboratory results</p> <p>7. Soil boring logs</p> <p>8. Monitoring well logs</p> <p>9. Laboratory certification</p> <p>10. Applicable Professional Engineer Certification</p> <p>11. Site maps to scale and oriented north showing:</p> <p>a. Final soil sample locations demonstrating completion of remediation</p> <p>b. Groundwater monitoring well locations</p> <p>c. Groundwater recovery/discharge points</p> <p>d. Plume of contamination as defined by laboratory analyses</p> <p>e. Area remediated</p> <p>12. Property Owner Summary</p> <p>13. Photographs documenting corrective action activities</p>	<p>PM</p> <p>CAD Operator</p>	<p>32</p> <p>8</p>	<p>Professional engineer certification included under 5.b. below.</p> <p>Site map already prepared under Early Action. Only modifications required at this point.</p>
<p>b. Review and certification of corrective action completion report and application for payment.</p>	<p>LPE</p>	<p>4</p>	<p>PM/Senior staff reference deleted. Reference to applications for payment added.</p>
<p>6. Resource Coordination</p> <p>a. Record NFR letter</p>	<p>Administrative Asst</p>	<p>2</p>	

ATTACHMENT 2 SCOPES OF WORK FOR PART 734 PROFESSIONAL CONSULTING SERVICES LUMP SUMS

Scope of Work Personnel Hours Comments

<p>7. Distribution a. Deliver draft corrective action completion report and application for payment to owner/operator for review and signature b. Make copies of corrective action completion report and application for payment for distribution c. Deliver completed corrective action completion report and application for payment to IEPA and owner/operator d. Make copies of recorded NFR letter for distribution e. Deliver recorded NFR letter to IEPA and owner/operator 8. Prepare applications for payment</p>	<p>Administrative Asst</p>	<p>3</p>	<p>Covers all copying, delivering costs and recording of NFR letter. References to applications for payment added.</p>
	<p>Account Tech</p>	<p>8</p>	<p>This has been added to the IPCB's proposal.</p>
<p>Section 734.845(d)(2) Development of Tier 2 or Tier 3 remediation objectives</p>	<p>PM</p>	<p>8</p>	
<p>Section 734.845(f) Amendment of plan due to unforeseen circumstances and its associated budget</p>	<p>PM Acct Tech</p>	<p>6 2</p>	

ATTACHMENT 3 SUMMARY OF PROFESSIONAL CONSULTING SERVICES LUMP SUMS FOR PART 732

Section/Title	Personnel/Hours	Total from Task Breakdown (Spreadsheet)		Amount Proposed in Subpart H
		High	Low	
732.845(a)(1) Preparation for the abandonment or removal of USTs	PM/9 Tech/5	\$1225 ¹	\$1035 ¹	\$960 ¹
732.845(a)(3) Preparation and submission of 20-day and 45-day reports	PM/19 CAD/8 Admin Asst/3 LPE/LPG/1 Acct Tech/8	\$3085 ^{1,2}	\$2477 ^{1,2}	\$4800 ^{1,2}
732.845(a)(6) Preparation and submission of free product removal reports	PM/6 CAD/1 Admin Asst/3 LPE/LPG/1	\$925	\$747	\$1600
732.845(a)(7) Preparation and submission of reports submitted pursuant to Section 734.202(h)(3)	PM/2 Admin Asst/2	\$290	\$230	\$500
732.845(b)(1) Preparation and submission of site classification plans, site classification preparation, fieldwork, field oversight, and the preparation and submission of the site classification completion report	PM/40 Geologist/10 CAD/13 Tech/20 LPE/LPG/4 Admin Asst/4 Acct Tech/12	\$8540 ²	\$6608 ²	\$9870 ²
732.845(c)(1) Preparation and submission of low priority groundwater monitoring plan	PM/8 Acct Tech/4 LPE/LPG/2 Admin Asst/2	\$1370	\$1094	\$3200

Note: This summary includes only lump sum amounts for Professional Consulting Services. It does not include professional consulting services costs to be reimbursed on a unit rate basis (i.e., field over-site and travel costs).

ATTACHMENT 3 SUMMARY OF PROFESSIONAL CONSULTING SERVICES LUMP SUMS FOR PART 732

Section/Title	Personnel/Hours	Total from Task Breakdown (Spreadsheet)		Amount Proposed in Subpart H
		High	Low	
732.845(c)(3) Preparation and submission of first year groundwater monitoring reports	PM/8 CAD/2 LPE/LPG/2 Admin Asst/2 Account Tech/4	\$1490	\$1174	\$2560
732.845(c)(4) Preparation and submission of second year groundwater monitoring reports	PM/8 CAD/2 LPE/LPG/2 Admin Asst/2 Account Tech/4	\$1490	\$1174	\$2560
732.845(c)(5) Preparation and submission of low priority groundwater monitoring completion report	PM/8 CAD/2 LPE/LPG/2 Admin Asst/2 Account Tech/4	\$1490	\$1174	\$2560
732.845(d)(1)(A) Preparation and submission of investigation plans for on-site contamination for sites classified pursuant to Section 732.307	PM/26 CAD/8 Account Tech/4 LPE/LPG/2 Admin Asst/2	\$3650	\$3034	\$3200
732.845(d)(1)(B) Preparation and submission of investigation plans for off-site contamination for sites classified pursuant to Section 732.307	PM/26 CAD/8 Account Tech/4 LPE/LPG/2 Admin Asst/2 PM-additional 4 - for each off-site access property.	\$3650 + 400 for each off-site property	\$3034 + \$360 for each off-site property	\$3200

Note: This summary includes only lump sum amounts for Professional Consulting Services. It does not include professional consulting services costs to be reimbursed on a unit rate basis (i.e., field over-site and travel costs).

ATTACHMENT 3 SUMMARY OF PROFESSIONAL CONSULTING SERVICES LUMP SUMS FOR PART 732

Section/Title	Personnel/Hours	Total from Task Breakdown (Spreadsheet)		Amount Proposed in Subpart H
		High	Low	
732.845(d)(3) Well surveys conducted pursuant to Sections 732.404(e)(1) and 734.445(b)	PM/4	\$400	\$360	\$160
732.845(d)(4) Preparation and submission of corrective action plan (Conventional)	PM/38 Tech/4 CAD/2 Account Tech/8 LPE/LPG/4 Admin Asst/2	\$5230	\$4378	\$5120
732.845(d)(6)(B) Development of Tier 2 or Tier 3 remediation objectives	PM/8	\$800	\$720	\$800
732.845(d)(7) Environmental Land Use Controls and Highway Authority Agreements	PM/8	\$800	\$720	\$800
732.845(d)(8) Preparation and submission of corrective action completion report	PM/32 CAD/8 LPE/4 Admin Asst/5 Account Tech/8	\$4865	\$4045	\$5120

Note: This summary includes only lump sum amounts for Professional Consulting Services. It does not include professional consulting services costs to be reimbursed on a unit rate basis (i.e., field over-site and travel costs).

ATTACHMENT 4 SUMMARY OF PROFESSIONAL CONSULTING SERVICES LUMP SUMS FOR PART 734

Section/Title	Personnel/Hours	Total from Task Breakdown (Spreadsheet)		Amount Proposed in Subpart H
		High	Low	
734.845(a)(1) Preparation for the abandonment or removal of USTs	Tech/5 PM/9	\$1225 ¹	\$1035 ¹	\$960 ¹
734.845(a)(3) Preparation and submission of 20-day and 45-day reports	PM/19 CAD/8 Acct Tech/8 Admin Asst/3 LPE/LPG/1	\$3085 ^{1,2}	\$2477 ^{1,2}	\$4800 ^{1,2}
734.845(a)(6) Preparation and submission of free product removal reports	PM/6 CAD/1 LPE/LPG/1 Admin Asst/3	\$925	\$747	\$1600
734.845(a)(7) Preparation and submission of reports submitted pursuant to Section 734.210(h)(3)	PM/2 Admin Asst/2	\$290	\$230	\$500
734.845(b)(1) Preparation and submission of stage 1 site investigation plan	PM/10	\$1000	\$900	\$1600
734.845(b)(3) Preparation and submission of stage 2 site investigation plan	PM/26 CAD/8 Acct Tech/12 Admin Asst/2 LPE/LPG/2	\$4090 ²	\$3314 ²	\$3200 ²

Note: This summary includes only lump sum amounts for Professional Consulting Services. It does not include professional consulting services costs to be reimbursed on a unit rate basis (i.e., field over-site and travel costs).

ATTACHMENT 4 SUMMARY OF PROFESSIONAL CONSULTING SERVICES LUMP SUMS FOR PART 734

Section/Title	Personnel/Hours	Total from Task Breakdown (Spreadsheet)	Amount Proposed in Subpart H
		High	
		Low	
734.845(b)(5) Preparation and submission of stage 3 site investigation plan	PM/26 CAD/8 Acct Tech/12 LPE/LPG/2 Admin Asst/2 PM-additional 4 - for each off-site access property.	\$4090 + \$400 for each off-site property	\$3200-Agency T&M - Board
734.845(b)(7) Well surveys conducted pursuant to Section 734.445(b)	PM/4	\$400	\$160
734.845(b)(8) Preparation and submission of site investigation completion report	PM/20 CAD/4 LPE/LPG/2 Admin Asst/2 Acct Tech/8	\$3030	\$1600
734.845(c)(1) Preparation and submission of corrective action plan (Conventional)	PM/38 Tech/4 CAD/2 Acct Tech/8 LPE/LPG/4 Admin Asst/2	\$5230	\$5120
734.845(c)(3) Environmental Land Use Controls and Highway Authority Agreements	PM/8	\$800	\$800

Note: This summary includes only lump sum amounts for Professional Consulting Services. It does not include professional consulting services costs to be reimbursed on a unit rate basis (i.e., field over-site and travel costs).

ATTACHMENT 4 SUMMARY OF PROFESSIONAL CONSULTING SERVICES LUMP SUMS FOR PART 734

Section/Title	Personnel/Hours	Total from Task Breakdown (Spreadsheet)	Amount Proposed in Subpart H
734.845(c)(4) Preparation and submission of corrective action completion report	PM/32 CAD/8 LPE/LPG/4 Admin Asst/5 Acct Tech/8	High \$4865 Low \$4045	\$5120
734.845(d)(2) Development of Tier 2 or Tier 3 remediation objectives	PM/8	\$800	\$800
734.845(f) Amendment of plan and its associated budget	PM/6 Acct Tech/2	\$710	\$640

	High	Low
LPE/LPG	\$130	\$92
PM	\$100	\$90
Tech	\$65	\$45
Geologist	\$110	\$70
	High	Low
	\$60	\$40
	Admin Asst	\$45
	Acct Tech	\$55
		\$35

¹ In the IEPA's proposal preparation of Health and Safety Plan costs were included in the preparation of the 20 Day and 45 Day Report cost. In this breakdown, preparation of Health and Safety Plan costs are included in preparation for the abandonment or removal of USTs.

² In the IEPA's proposal potable water Assstly well survey costs were included in the preparation of the 20 Day and 45 Day Report costs. In this breakdown, potable water Assstly well survey costs are included in Stage 2 Site Investigation Plan costs.

Note: This summary includes only lump sum amounts for Professional Consulting Services. It does not include professional consulting services costs to be reimbursed on a unit rate basis (i.e., field over-site and travel costs).

STATE OF ILLINOIS)
)
COUNTY OF SANGAMON)

PROOF OF SERVICE

I, the undersigned, on oath state that I have served the attached Illinois Environmental Protection Agency's Submission of Pre-Filed Testimony For The March 23, 2006 Hearing and Testimony of Douglas W. Clay Regarding The Illinois Pollution Control Board's Proposed 35 ILL.ADM.Code 732.845 and 734.845 on behalf of the Illinois Environmental Protection Agency upon the person to whom it is directed, by placing a copy in an envelope addressed to:

Dorothy M. Gunn, Clerk
Pollution Control Board
James R. Thompson Center
100 West Randolph St., Ste 11-500
Chicago, Illinois 60601
(Overnight Mail)

Marie Tipsord, Hearing Officer
Pollution Control Board
James R. Thompson Center
100 West Randolph St., Ste 11-500
Chicago, Illinois 60601
(Overnight Mail)

See Attached Service List
(1st Class)

and mailing it from Springfield, Illinois on 2-28-06

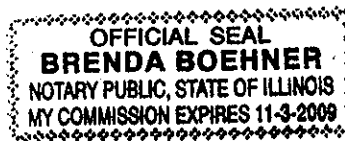
Meredith Kelley

SUBSCRIBED AND SWORN TO BEFORE ME

this 28th day of February, 2006

Brenda Boehner

Notary Public



THIS FILING IS SUBMITTED ON RECYCLED PAPER

Party Name	Role	City & State	Phone/Fax
<u>Ogle County State's Attorney Office</u> Interested Party Michael C. Rock, Assistant State's Attorne	Ogle County Courthouse 110 South Fourth Street, P.O. Box 395	Oregon IL 61061- 0395	815/732-1170 815/732-6607
<u>Brown, Hay & Stephens LLP</u> Interested Party Claire A. Manning	700 First Mercantile Bank Building 205 South Fifth St., P.O. Box 2459	Springfield IL 62705- 2459	217/544-8491 217/241-3111
<u>IEPA</u> Petitioner Gina Roccaforte, Assistant Counsel Kyle Rominger, Assistant Counsel Doug Clay	1021 North Grand Avenue East P.O. Box 19276	Springfield IL 62794- 9276	217/782-5544 217/782-9807
<u>Hodge Dwyer Zeman</u> Interested Party Thomas G. Safley	3150 Roland Avenue Post Office Box 5776	Springfield IL 62705- 5776	217/523-4900 217/523-4948
<u>Sidley Austin LLP</u> Interested Party William G. Dickett	One South Dearborn	Chicago IL 60603	312/853-7000 312/853-7036
<u>Karaganis, White & Magel, Ltd.</u> Interested Party Barbara Magel	414 North Orleans Street Suite 810	Chicago IL 60610	312/836-1177 312/836-9083
<u>Illinois Petroleum Marketers Association</u> Interested Party Bill Fleischi	112 West Cook Street	Springfield IL 62704	217/793-1858
<u>United Science Industries, Inc.</u> Interested Party Joe Kelly, PE	P.O. Box 360 6295 East Illinois Highway 15	Woodlawn IL 62898- 0360	618/735-2411 618/735-2907
<u>Illinois Environmental Regulatory Group</u> Interested Party N. LaDonna Driver	3150 Roland Avenue	Springfield IL 62703	217/523-4942 217/523-4948
<u>Carlson Environmental, Inc.</u> Interested Party Kenneth James	65 E. Wacker Place Suite 1500	Chicago IL 60601	
<u>Chemical Industry Council of Illinois</u> Interested Party Lisa Frede	2250 E. Devon Avenue Suite 239	DesPlaines IL 60018- 4509	
<u>Barnes & Thornburg</u> Interested Party Carolyn S. Hesse, Attorney	1 North Wacker Drive Suite 4400	Chicago IL 60606	312/357-1313 312/759-5646
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Interested Party

Craig S. Gocker, President	Environmental Bureau	Chicago	312/814-2550
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RoseMarie Cazeau, Bureau Chief			
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Dorothy M. Gunn, Clerk of the Board			
Marie Tipsord, Hearing Officer			
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Melanie LoPiccolo, Office Manager			
<u>Illinois Department of Natural Resources</u>	One Natural Resources Way	Springfield	217/782-1809
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<u>Great Lakes Analytical</u>	1380 Busch Parkway	Buffalo Grove	(847) 808-
Interested Party		IL 60089	7766
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Interested Party		IL 62703	
Joseph W. Truesdale, P.E.			
<u>CORE Geological Services, Inc.</u>	2621 Monetga, Suite C	Springfield	217-787-6109
Interested Party		IL 62704	
Ron Dye, President			
<u>Clayton Group Services Inc</u>	3140 Finley Road	Downers Grove	630.795.3207
Interested Party		IL 60515	
Monte Nienkerk			
<u>PDC Laboratories</u>	2231 W. Altorfer Dr.	Peoria	309-692-9688
Interested Party		il 61615	
Kurt Stepping, Director of Client Services			
<u>Atwell-Hicks, Inc.</u>	940 East Diehl Road	Naperville	630 5770800

Interested Party Thomas M. Guist, PE, Team Leader	Sute 100	IL 60563	
<u>CW3M Company, Inc.</u> Interested Party Jeff Wienhoff	701 South Grand Ave. West	Springfield IL 62704	217-522-8001
<u>Suburban Laboratories, Inc.</u> Interested Party Jarrett Thomas, V.P.	4140 Litt Drive	Hillside IL 60162	708-544-3260
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<u>MACTEC Engineering & Consulting, Inc.</u> Interested Party Terrence W. Dixon, P.G.	8901 N. Industrial Road	Peoria IL 61615	
<u>Illinois Department of Transportation</u> Interested Party Steven Gobelman	2300 S. Dirksen Parkway Room 330	Springfield IL 62764	
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<u>Herlacher Angleton Associates, LLC</u> Interested Party Jennifer Goodman	522 Belle Street	Alton IL 62002	
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<u>American Environmental Corp.</u> Interested Party Ken Miller, Regional Manager	3700 W. Grand Ave., Suite A	Springfield IL 62707	217/585-9517
<u>Applied Environmental Solutions, Inc.</u> Interested Party Delete Me 2	P O Box 1225	Centralia IL 62801	6185335953
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<u>Caterpillar, Inc.</u> Interested Party Eric Minder, Sr. Environmental Engineer	100 NE Adams Street	Peoria IL 61629	3096751658
<u>K-Plus Environmental</u> Interested Party Daniel Caplice	Suite 1000 600 W. Van Buren Street	Chicago IL 60607	312-207-1600

Illinois Society of Professional Engineers Interested Party Kim Robinson Brittan Bolin	600 South Second Street Suite 403	Springfield IL 62704	217-544-7424 217-525-6239
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GEI Consultants, Inc. Interested Party Daniel J. Goodwin, P.E.	243 North Lindbergh Blvd. Suite 312	St. Louis MO 63141- 7851	314-569-9979
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Total number of participants: 52