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SAINT FRANCIS MEDICAL CENTER

September 8, 2008

John Therriault, Clerk
Illinois Pollution Control Board
100 W Randolph
Suite 11-500
Chicago, IL 60601

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CLERK'S OFFICE

SEP 15 2008

STATE OF ILLINOIS
Pollution Control Board

PC220

To whom it may concern:

Enclosed, please find a copy of my May 8, 2007 correspondence to the IEPA regarding the continued operation of PDC's Hazardous Waste Facility in Pottstown, Peoria County. As physicians caring for cancer patients in Peoria County and Central Illinois, we applaud and commend the recent decisions of the IEPA and the Peoria County Board to deny the permit to expand the facility. This letter is in response to PDC's recent request (and subsequent Illinois Pollution Control Board Public Hearing) to de-list, as a hazardous waste, Electrical Arc Furnace Dust, (K061), effectively expanding the operational life of the facility.

As stated in the prior letter, physicians in Peoria, including those serving on the Cancer Committee at OSF Saint Francis Medical Center, (which I chair), remain highly concerned about the continued **importation and accumulation** of toxic and/or **known carcinogenic chemicals** into Peoria County, by PDC or anyone else. It has been well documented by the IDPH through data obtained from the American Cancer Society, that **Peoria County has an elevated cancer incidence**, when compared to most other counties in Illinois. This is not to say that PDC is responsible for the elevated cancer rate in Peoria County, since as scientists, we recognize that carcinogenesis is a multi-factorial problem.

PDC claims that their "proprietary", new process will stabilize, and render inert, the heavy metals included in EAF dust. Exactly which of the heavy metals, (thirteen of which are listed as constituents of EAF dust by the EPA), and any other potentially carcinogenic, volatile organic compounds that will be "stabilized" is not made clear by PDC. Inquiring minds want to know!

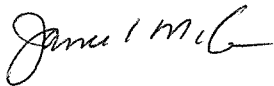
Regardless, whether or not some of PDC's individual waste streams, (such as EAF dust), are processed by PDC in a different manner has little bearing on the overall issue, which remains, the unacceptable health risks posed to our population by importing these compounds into Peoria from **outside the County of Peoria, and outside the state of Illinois**. We believe the **import**, for processing or interment, **should cease immediately**. Moreover, hazardous chemicals already buried in unprotected areas of the facility should be remediated as soon as possible.

As to the argument about disposing of the Peoria-generated hazardous waste (including EAF dust), from Keystone or Caterpillar, I think most persons would agree that, "what is generated in Peoria stays in Peoria". That is just the cost of doing business in any community, and frankly, all of Peoria benefits from those industries. That said, many similar industries have decided to recycle the heavy metals rather than bury them in landfills.

What we, as physicians and scientists, take issue with and simply do not understand, is the scientific logic behind importing more of these toxic substances into an environment that already has an abnormally high cancer burden. The increased health risk posed by importing these toxic compounds is borne by the community as a whole, who reap no benefit for assuming that increased risk. It seems only fair and logical that other states, that produce hazardous substances, bear the appropriate costs for the disposition of such, both from a financial and health risk perspective.

We, as physicians caring for families in and around Peoria County, respectfully request that the Illinois Pollution Control Board act in the best interests of the health of Peoria county citizens, (as did the IEPA and the Peoria County Board previously), and deny the current request of Peoria Disposal Company to de-list electrical arc furnace dust as a hazardous waste stream. Furthermore, we ask that any future request from PDC, which would otherwise prolong the (term limited) life of the Hazardous Waste Facility, be carefully considered in this context.

Sincerely,



James L. McGee, M.D.
Chairman Cancer Committee
OSF Saint Francis Medical Center
530 N.E Glen Oak
Peoria, IL, 61637



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SAINT FRANCIS MEDICAL CENTER
A commitment to life.

May 8, 2007

Stephanie Flowers
Hearing Officer #21
Illinois Environmental Protection Agency
1021 Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

Dear Ms. Flowers:

I am the Chairman of the Cancer Committee at OSF Saint Francis Medical Center which is composed of cancer surgeons, oncologists, pathologists, radiation therapy physicians, nurses, cancer registrars and a lay person from the Peoria business community. We discussed PDC's pending application to expand the hazardous waste disposal facility at PDC #1 in Pottstown. After reviewing the IDPH data on elevated cancer rates in Peoria County, the Committee members felt that continued operation of the PDC facility poses significant risk to the health of Peoria County residents.

During the discussion, it was agreed that no one is saying that PDC's operation is directly causing cancer. Rather, the concern was that it just does not make good sense to continue importing known carcinogenic hazardous waste from outside Peoria County and outside the state of Illinois, and burying it in a site so close to a populated area and over the aquifer, in a county with a documented high cancer burden.

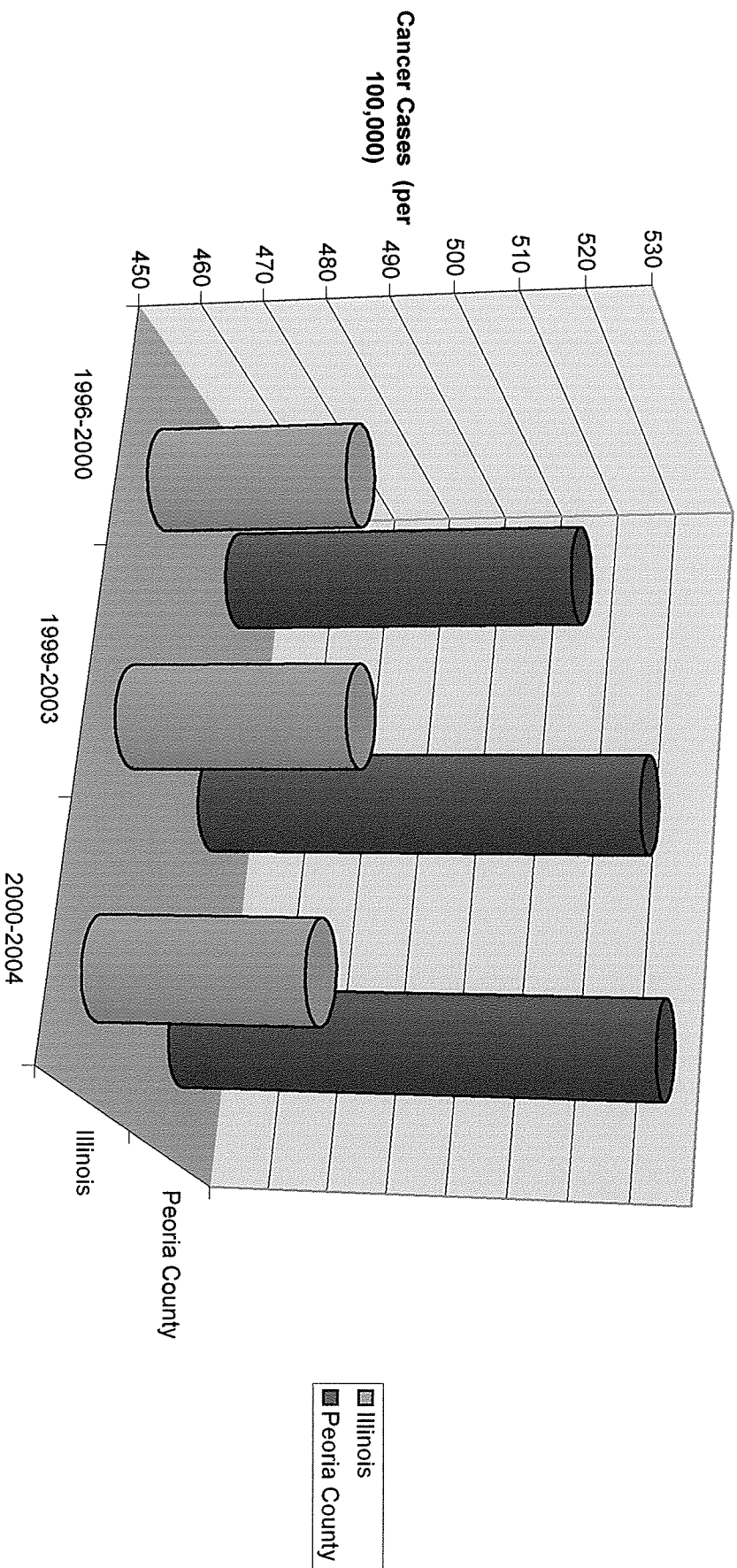
The Cancer Committee therefore adds its voice to those of the Medical Staff of all three Peoria Hospitals, the Peoria Medical Society and the Illinois State Medical Society in opposing the expansion of the Peoria Disposal Company's Hazardous Waste Landfill at Pottstown. Moreover, we urge the IEPA to help us protect the health of Peoria County residents by addressing the cleanup of the closed, unprotected "legacy" areas of the landfill which existed prior to RCRA regulations.

Sincerely,

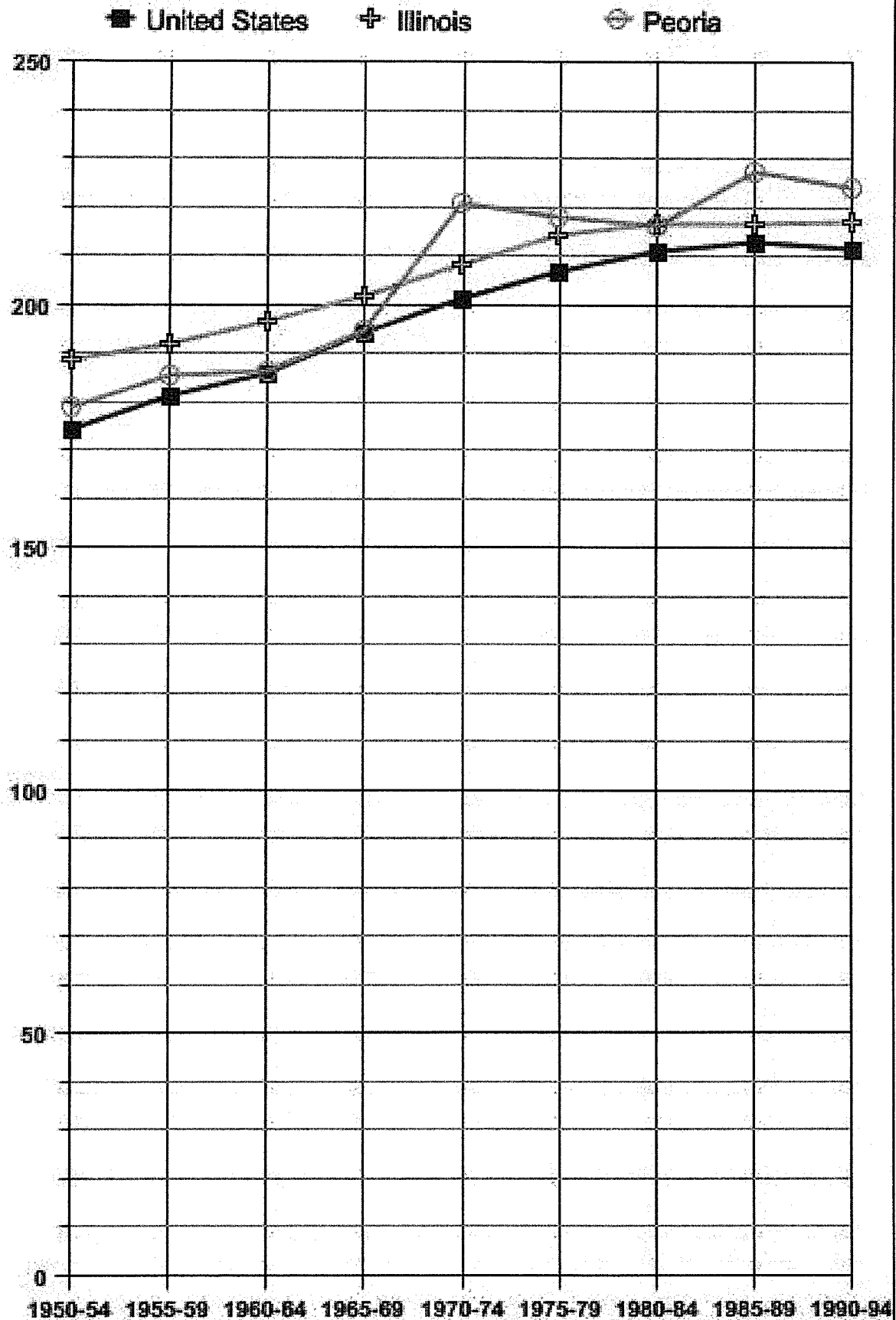
James McGee, M.D.
Chair, Cancer Committee

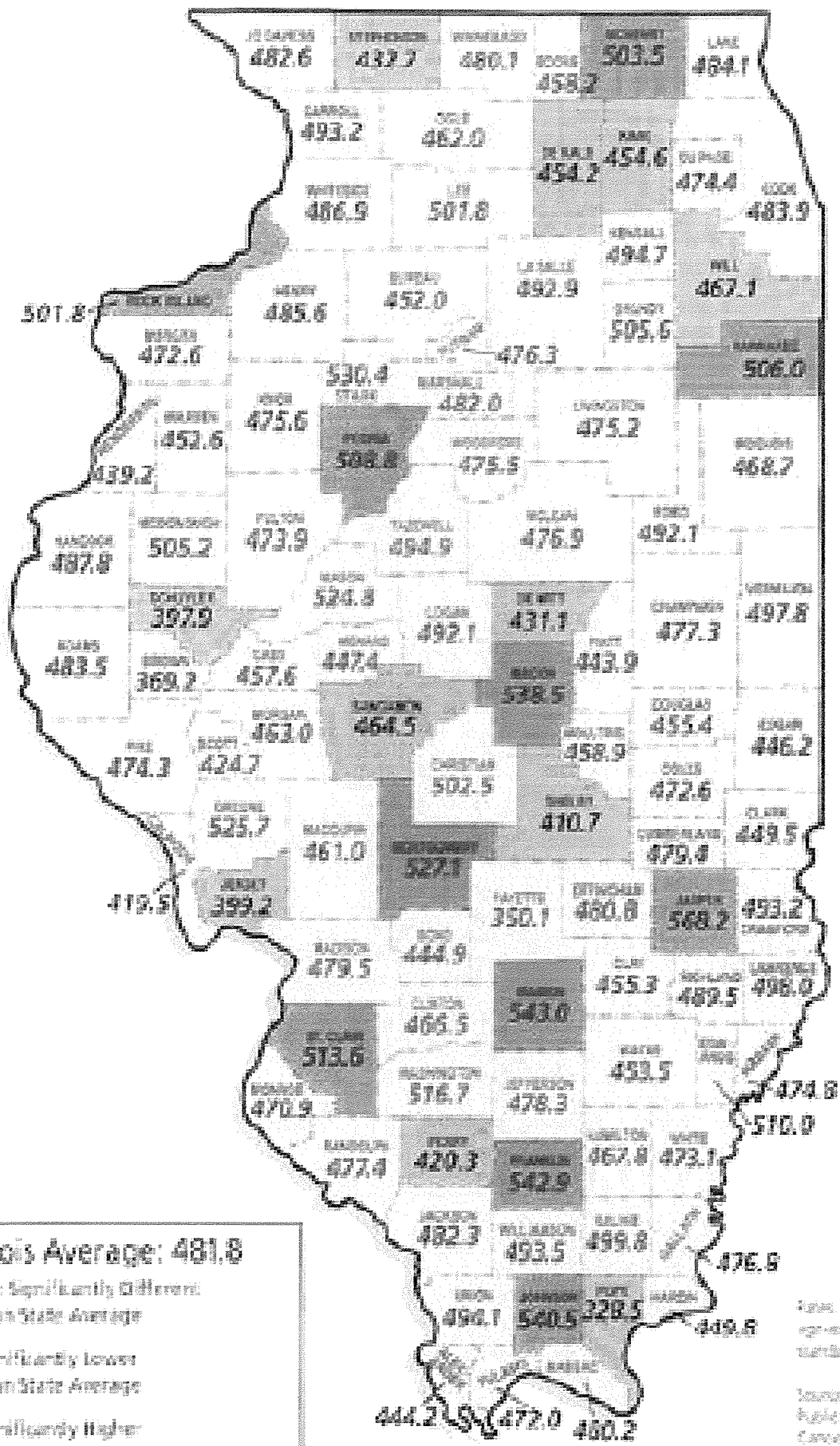
Cancer Rates

IDPH, Illinois Cancer Registry



5-year Cancer Mortality Rates per 100,000 person-years,
Age-adjusted 1970 US Population
All Cancers, White Males, 1950 to 1994, All Ages





Illinois Average: 481.8

- Not Significantly Different Than State Average
- Significantly Lower Than State Average
- Significantly Higher Than State Average

Rate per 100,000 and is age-adjusted for the 2000 standard million population

Source: Illinois Department of Public Health, Illinois State Cancer Registry, January 2002