



ASSOCIATION OF ENVIRONMENTAL &
ENGINEERING GEOLOGISTS

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Illinois Pollution Control Board
1021 North Grand Avenue East
P.O. Box 19274
Springfield, Illinois 62794-9274

PC# 3

October 5, 2011

Re: Case No. R2012-009 – Proposed Amendments to Clean Construction or Demolition Debris (CCDD) Fill Operations: Proposed Amendments to 35 Ill. Adm. Code 1100

Dear Sirs/Madams;

I am writing to you on behalf of the Association of Environmental & Engineering Geologists (AEG). The Association represents over 3000 environmental and engineering geologists throughout the United States. The AEG recognizes the value added by environmental and engineering geologists in a range of projects that require interpretation of complex geologic and environmental issues. It is our policy to promote environmental and engineering geology for situations that require specialized training and expertise in geology.

This letter serves as my written testimony in the referenced case. The Illinois CCDD rules as currently written fail to recognize the need for a professional geologist in the monitoring of CCDD materials. In particular, our concern is that disposal of these materials in quarries and mines that were excavated in rock will require someone with an appropriate background in geology to assess a proper monitoring plan. Since these materials will be disposed of in mined rock, the hydrogeology will be complicated by the presence of fractures and the primary porosity of the rock. It is the AEG's position that disposal of materials in mined rock openings requires assessment by practitioners properly trained in geology. At a minimum, this would require relevant experience with developing deep aquifer monitoring plans and completion of a geology degree that includes coursework in Structural Geology, Hydrogeology, Igneous and Metamorphic Petrology, and Stratigraphy. Most professional engineers would not meet this minimum requirement; hence, we encourage you to review the monitoring requirements in the code.

Thank you for providing us an opportunity to provide written testimony in your rulemaking hearings.

Sincerely,

Jennifer B. Bauer, L.G.
2011-2012 President, Association of Environmental & Engineering Geologists