

ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
PROPOSED AMENDMENTS TO)	
CLEAN CONSTRUCTION OR DEMOLITION)	R2012-09
DEBRIS FILL OPERATIONS (CCDD):)	(Rulemaking – Land)
PROPOSED AMENDMENTS TO 35 Ill.)	
Adm. Code 1100))	

PRE-FILED TESTIMONY OF DUANE T. KREUGER ON ILLINOIS EPA’S PROPOSED AMENDMENTS TO PART 1100

Qualifications

My name is Duane T. Kreuger. I am the Environmental Group Manager with Geotechnology, Inc and am a Past President of the Association of Environmental and Engineering Geologists (AEG). Geotechnology, Inc. is a 150 member professional engineering and environmental consulting firm with offices in St. Louis, MO, Collinsville, IL, Overland Park, KS and Memphis, TN. The AEG is a professional society with approximately 3,000 members including geological engineers, engineering geologists, geologists, and hydrogeologists.

I graduated from the University of Illinois-Urbana in 1992 with a B.S. in Geology. I am a Registered Geologist in Missouri and a Professional Geologist in Illinois. A copy of my resume is included as Attachment 1.

Testimony

Today I am testifying in support of the proposed amendments to the existing 35 Ill. Adm. Code Part 1100 and request that the Illinois Pollution Control Board consider an additional amendment to Section 1100.710 – Professional Engineer Supervision – to allow Licensed Professional Geologists (PGs) to have similar supervisory authority regarding the design of groundwater monitoring systems and groundwater monitoring programs (1100.725 and 1100.730) as that afforded to Professional Engineers (PE).

Licensed geologists, through their education, training and experience are uniquely qualified to evaluate and interpret three-dimensional subsurface conditions, including the distribution and characteristics of soil and rock materials and formations, and the presence, location, distribution and movement of water and other fluids within these materials. Educational coursework including stratigraphy, structural geology, geomorphology, hydrogeology, and soils provide geologists the tools and understanding to design groundwater monitoring systems. The proposed rules allow for placing CCDD in quarries, pits, etc., where the fill may be in direct contact with open fractures in the soil or bedrock. Professional geologists possess abilities to interpret these on-site geologic conditions, and can determine the

differences between perched groundwater and an aquifer and any potential pathways for contaminant migration. Thus, professional geologists are equally qualified to design and supervise groundwater monitoring systems and programs.

In order to be licensed as a Professional Geologist in Illinois, candidates must pass two examinations, the Fundamentals of Geology and Practice of Geology examinations developed by the National Association of State Boards of Geology (ASBOG). Approximately one-fifth of the practice examination specifically addresses issues related to the practice of hydrogeology. Geologists licensed in Illinois are fully qualified to design groundwater monitoring systems and programs.

RESUME

Duane T. Kreuger, R.G., P.G.

Environmental Group Manager

Experience: 19 years
Education: B.S., Geology, University of Illinois-Urbana
Registration: Registered Geologist – Missouri
Professional Geologist – Illinois
Environmental Professional (per ASTM 1527-05 and AAI criteria)

Mr. Kreuger is Geotechnology's Environmental Group Manager. He has performed hundreds of Phase I ESA's for Local, State, and Federal sites, gasoline stations, hotel developments, libraries, historic facilities, educational campuses, multifamily developments, HUD properties, and brownfield sites. His experience includes a planned development of a 640-acre tract in Collinsville, Illinois; redevelopment of the historic Warren Funeral Home in Columbia, Missouri; industrial development of a 320-acre tract in Hazelwood, Missouri; and Missouri State emissions testing stations in St. Louis County.

Mr. Kreuger has served as environmental consultant on dozens of asbestos and lead abatement projects related to renovations of building and HVAC systems, demolition of structures, and property transfers for both public and private sectors. His experience also includes air sampling and contractor observation. Among his project experience is the oversight of environmental demolition activities on the Lambert-St. Louis Airport Expansion Project and at the Civil Courts renovation project for the City of St. Louis. Tasks for these included lead and asbestos inspections, third party air monitoring, characterization of hazardous waste streams, and PCB removal in the historic, 300,000 square foot court building. He has also overseen the campus-wide asbestos surveys and Operations & Maintenance plans for Webster University.

Mr. Kreuger has served as field geologist on hundreds of subsurface exploration/groundwater monitoring projects including Superfund sites, solid waste landfills, levee/dewatering projects, bridge design, and private developments.

Mr. Kreuger has served as Project Manager for the Lambert - St. Louis International Airport Expansion project which included \$4.5 Million of asbestos inspections and monitoring, Phase I/II ESAs, groundwater monitoring and risk assessments.

Mr. Kreuger served as program manager for over 60 underground storage tank sites for a large oil company client in Missouri and Illinois. He was responsible for writing work plans/cost estimates, directing field activities (including subsurface investigations, groundwater monitoring events, remedial application techniques and response activities) and submitting reimbursement information to the storage tank insurance funds.

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