

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
PROPOSED AMENDMENTS TO CLEAN) R12-009
CONSTRUCTION OR DEMOLITION) (Rulemaking – Land)
DEBRIS (CCDD) FILL OPERATIONS:)
PROPOSED AMENDMENTS TO 35 Ill.)
Adm. Code 1100)

NOTICE OF FILING


TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board the Supplemental Public Comment Regarding Groundwater Monitoring Costs Submitted by Waste Management of Illinois, Inc., a copy of which is herewith served upon you.

Dated: April 18, 2012

Respectfully submitted,

**WASTE MANAGEMENT OF
ILLINOIS, INC.**

By: 
Michelle A. Gale
Waste Management
720 East Butterfield Road
Lombard, Illinois 60148
(630) 572-8800

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

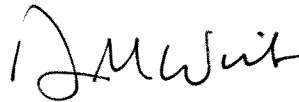
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CONSTRUCTION OR DEMOLITION) (Rulemaking – Land)
DEBRIS (CCDD) FILL OPERATIONS:)
PROPOSED AMENDMENTS TO 35 Ill.)
Adm. Code 1100)

**SUPPLEMENTAL PUBLIC COMMENT REGARDING
GROUNDWATER MONITORING COSTS SUBMITTED BY
WASTE MANAGEMENT OF ILLINOIS, INC.**

Waste Management of Illinois, Inc. (“Waste Management”) by and through its counsel, Dennis Wilt, hereby files a supplemental public comment in this matter regarding groundwater monitoring costs, pursuant to the Hearing Officer Order issued on March 14, 2012.

During the March 13 public hearing, Mr. Liss, who appeared on behalf of Waste Management, was questioned by Mr. Wight with respect to the costs of a basic groundwater monitoring system (see pages 129-130 of the March 13 transcript). Attached as Exhibit A to this Supplemental Public Comment is a chart prepared by Mr. Liss indicating that the total cost of a simple groundwater monitoring system with four thirty-foot wells (three upgradient and one downgradient) would range between \$5,400 and \$12,000. When extrapolated over many tons of soil over many years, the cost per ton is insignificant, being a few pennies per ton.

Respectfully submitted,



Dennis Wilt
Attorney for Waste Management of Illinois, Inc.

Dated: April 18, 2012

Exhibit A

Groundwater Monitoring System Costs

Driller	Location	Phone No.	Union (y/n)	Mob Chrg (\$)	Price/Foot (\$)*	Total Cost (\$)
A	North	(630) 450-5496	N	300.00	42.50	5,400.00
B	North	(630) 458-0590	Y	1,200.00	90.00	12,000.00
C	North	(630) 377-7766	N	700.00	65.42	8,550.00
D	South	(618) 286-0330	N	900.00	47.69	6,222.00
E	South	(217) 254-9990	N	1,250.00	81.50	11,030.00
F	South	(618) 523-4266	N	1,000.00	58.33	8,000.00

Drillers A, B, & C are located in northern Illinois (Chicago area).

Drillers D, E, & F are located in central and southern Illinois.

Higher price range reflection unionized companies.

Higher price range also reflects costs for drilling in all rock vs. unconsolidated material.

*Prices based on 4 30-foot wells (3 downgradient and 1 upgradient), or 120 total feet of drilling. Wells will be 2-inch wells constructed of PVC in accordance with IEPA and IDPH requirements.


PROOF OF SERVICE

I, Michelle A. Gale, certify that I have served the attached Notice of Filing and Supplemental Public Comment Regarding Groundwater Monitoring Costs Submitted by Waste Management of Illinois, Inc., on April 18, 2012, to the following by the methods indicated:

By electronic mail:	
John Therriault, Clerk Illinois Pollution Control Board James R. Thompson Center 100 West Randolph Street, Suite 11-500 Chicago, IL 60601 therriaj@ipcb.state.il.us	Marie Tipsord, Hearing Officer Illinois Pollution Control Board James R. Thompson Center 100 W. Randolph St., Suite 11-500 Chicago, IL 60601 tipsorm@ipcb.state.il.us
Matthew J. Dunn, Chief Environmental Enforcement Office of the Attorney General 69 West Washington Street, Suite 1800 Chicago, IL 60602 mdunn@atg.state.il.us	Stephen Sylvester, Asst. Attorney General Environmental Enforcement Office of the Attorney General 69 West Washington Street, Suite 1800 Chicago, IL 60602 ssylvester@atg.state.il.us
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Stephanie Flowers, Assistant Counsel Illinois Environmental Protection Agency 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276 Stephanie.Flowers@illinois.gov	Mitchell Cohen, General Counsel Illinois Department of Natural Resources One Natural Resources Way Springfield, IL 62702-1271 Mitchell.Cohen@illinois.gov
John Henrickson, Executive Director Illinois Association of Aggregate Producers 1115 S. Second Street Springfield, IL 62704 iaap@hansoninfosys.com	Claire A. Manning Brown, Hay & Stephens LLP 700 First Mercantile Bank Building 205 South Fifth St., P.O. Box 2459 Springfield, IL 62705-2459 cmanning@bhslaw.com
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James Huff, Vice President Huff & Huff, Inc. 915 Harger Road, Suite 330 Oak Brook, IL 60523 jhuff@huffnhuff.com	James M. Morphew Sorling, Northrup, Hanna, Cullen & Cochran, Ltd. Illinois Building, 607 East Adams, Suite 800 Springfield, IL 62705 jmmorphew@sorlinglaw.com
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By First Class Mail, postage prepaid:	
Steven Gobelman, Geologic/Waste Assessment Specialist Illinois Department of Transportation 2300 S Dirksen Parkway Springfield, IL 62764	Tiffany Chappell City of Chicago, Mayor's Office of Intergovernmental Affairs 121 N. LaSalle Street City Hall - Room 406 Chicago, IL 60602
Doris McDonald Chicago Department of Law 30 North LaSalle St., Suite 900 Chicago, IL 60602	


Michelle A. Gale