

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
PROPOSED AMENDMENTS TO CLEAN)	R12-9(B)
CONSTRUCTION OR DEMOLITION)	(Rulemaking - Land)
DEBRIS FILL OPERATIONS: PROPOSED)	
AMENDMENTS TO 35 ILL. ADM. CODE)	
1100)	
)	

NOTICE

To: Attached Service List

PLEASE TAKE NOTICE that today I filed the attached comments with the Illinois Pollution Control Board.

Respectfully submitted,

SEXTON PROPERTIES, R.P., LLC

Todd Daniels
2801 Lakeside Drive Suite #100
Bannockburn IL, 60015

By: 
Todd Daniels – Director of Operations

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PROPOSED AMENDMENTS TO CLEAN)	R12-9(B)
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Comments of Sexton Properties R.P., LLC

These comments are submitted on behalf of Sexton Properties R.P., LLC ("Sexton").

Sexton owns a CCDD facility in Richton Park, Illinois. The facility consists of two parcels totaling 81 acres. It started operations in October 2004 (prior to the original permitting regulations for CCDD operations).

I. GROUNDWATER MONITORING IS UNNECESSARY AND WILL DRIVE MANY OPERATORS OUT OF BUSINESS

Sexton agrees with the conclusion reached by the Pollution Control Board during earlier stages of this rulemaking that CCDD or uncontaminated soil fill operations should not be required to conduct groundwater monitoring. Although, as summarized below, there are policy and environmental reasons for not imposing groundwater monitoring requirements, it cannot be overlooked that the economics of running a CCDD facility in Illinois cannot justify the added – and we believe unnecessary – costs of operating a groundwater monitoring system. Put directly, if the Board accepts the language proposed by the Illinois Environmental Protection Agency (designated Subpart G - Groundwater Monitoring), Sexton will likely be forced to prematurely close the CCDD operation at the Richton Park facility.

We believe the Pollution Control Board was correct last year when it concluded that “no evidence was provided to demonstrate that CCDD or uncontaminated soil fill sites were a source

of groundwater contamination” and that “considering the potentially sizeable costs for groundwater monitoring ...[the] record does not support groundwater monitoring at this time.”

It must be emphasized that all of the data submitted to the Board to date regarding whether CCDD operations affect groundwater was collected *before the implementation* of the Board’s stringent “front-end” certification and load checking requirements. The IEPA’s proposed language set forth in Subpart G assumes the failure of these new procedures and then assumes that enough highly contaminated soil and debris will make it through the pre-acceptance checkpoints to present a threat to the environment. We believe that before implementing such a drastic measure as groundwater monitoring, it is essential for the Board to have a record not only that the front-end controls do not work but that they fail to such a degree that a threat to the environment is presented. Moreover, the question is not whether some sort of early-detection program is preferable but rather, whether there is a factual basis justifying the cost of groundwater monitoring in the first place. As the Board has already noted, no such record exists.

CCDD facilities and uncontaminated soil fill operations are, by definition, not waste disposal facilities and the materials they accept are not “wastes,” 415 ILCS 5/3.160(b) & (c) (2). Moreover, the Board’s regulations impose qualitative and quantitative standards to ensure that these materials are in fact clean. Clean construction or demolition debris consists of common building materials, such as concrete, stone, and asphalt. “Uncontaminated soil” is now quantitatively defined by reference to the same environmental standards the IEPA uses to declare a property “clean” and subject to “no further remediation.” See 35 Ill. Adm. Code Subpart F.

Requiring groundwater monitoring at uncontaminated soil fill operations creates an inherent contradiction with the Site Remediation Program. When an owner of a contaminated parcel of land achieves the Tier 1 standards he is entitled to receive a “no further remediation”

letter, but when an owner of an uncontaminated soil fill operation achieves the same soil standards he becomes subject to groundwater monitoring. The fact that the soil fill operator intentionally deposited the clean soil into a fill does not change either the chemical character of the soil or the impact on the environment. For the state's environmental program to have integrity, soil meeting the designated Tier 1 standards must be considered clean and thus warranting no further remediation under both the SRP *and* CCDD regulations.

II. SUMMARY

In summary, Sexton Properties R.P., LLC urges the Board to leave "Subject G: Groundwater Monitoring" out of the final rule because (a) there is no evidence that CCDD or uncontaminated soil facilities operating under the new screening and certification procedures cause groundwater contamination; (b) the new "front-end" controls are more than adequate to ensure the soil is "uncontaminated;" (c) these materials are by definition not "wastes;" (d) the Board's rules already establish, in the SRP program, that soil meeting the Tier 1 standards requires no further remediation; and last, (e) requiring groundwater monitoring will force Sexton to prematurely close the CCDD operation at Richton Park. CCDD operations exist because of need for a disposal outlet designed specifically for construction debris and soil. Shutting these facilities down unnecessarily will not only eliminate this disposal option, but also create future development problems for the unfinished facilities.

Respectfully submitted,

SEXTON PROPERTIES, R.P., LLC

Todd Daniels

2801 Lakeside Drive Suite #100

Bannockburn IL, 60015

By: 

Todd Daniels – Director of Operations



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[Pat Quinn, Governor](#)

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GENERAL INFORMATION	
Case No: R2012-009 (B)	Case Name: In the Matter of: Proposed Amendments to Clean Construction or Demolition Debris (CCDD) Fill Operations: Proposed Amendments to 35 Ill. Adm. Code 1100
Case Type: Rulemaking	
Media Type: Land	Board Member: Glosser, D.
County: Statewide	Hearing Officer: Tipsord, M.
Status: Board Order	

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Case Activity

Date	Activity Type	Activity Notes	View File
7/23/2013	Public Comment	Comments of submitted on behalf of Prairie Material by Richard Olsen, President and Michael Pratt General Manager, Aggregate Division	View File
6/12/2013	Hearing Officer Order/Correspondence	*Hearing Officer Order: Hearing held May 20, 2013; on April 18, 2013 questions were posed by the Board relating only to groundwater monitoring, Board asked more questions at the hearing; attached are questions from the transcript as well as additional questions raised, comment period closes August 1, 2013, anyone may file a comment and anyone may respond to the questions attached	View File
6/3/2013	Transcript	Transcript of May 20, 2013 hearing	View File
5/22/2013	Exhibit List	*Exhibit List from Hearing on May 20, 2013 (Exhibits 52 through 65)	View File
5/20/2013	Public Comment	*Comments of Dorothy Hynous (PC# 65) (electronic filing)	View File
5/13/2013	Prefiled Testimony	IEPA Responses to Pre-Filed Questions (electronic filing)	View File

5/13/2013	Prefiled Testimony	Pre-filed Testimony for the May 20, 2013 Hearing in Response to Pre-filed Questions Regarding the Necessity for Groundwater Monitoring; submitted by the County of Will as Represented by Stuart J. Cravens, Hydrogeologist with the PSC Industrial Outsourcing, LP (electronic filing)	View File
5/13/2013	Public Comment	Responses to Pre-filed questions in the Matter of Proposed Amendments to Clean Construction or Demolition Debris Fill Operations (CCDD) - Proposed Amendments to 35 Ill. Adm. Code 1100 (PC# 54) (380 Pages, <9MB) (electronic filing)	View File
5/13/2013	Prefiled Testimony	Pre-Filed Testimony of James E. Huff, P.E. (electronic filing)	View File
5/13/2013	Prefiled Testimony	Response to Board Questions on Behalf of Land Reclamation & Recycling Association (electronic filing)	View File
5/13/2013	Prefiled Testimony	Office of the Attorney General's Responses to the Board's Pre-filed Questions (201 pages) (electronic filing)	View File
5/13/2013	Prefiled Testimony	Prefiled Testimony of Mark J. Krumenacher, PG, of GZA GeoEnvironmental, Inc. (PC# 55) (electronic filing)	View File
5/13/2013	Prefiled Testimony	Prefiled Testimony of Martin J. Hamper, PG, CPG, Board Member of GZA GeoEnvironmental, Inc. (electronic filing)	View File
4/23/2013	Other	Certificate of publication; published in the Chicago Sun-Times on April 12, 2013	View File
4/19/2013	Prefiled Question	Office of the Attorney General's Pre-Filed Questions Regarding the Necessity for Groundwater Monitoring	View File
4/18/2013	Hearing Officer Order/Correspondence	*Hearing Officer Order: Board ordered an additional hearing to allow for questions to be posed based on comments on groundwater monitoring; hearings scheduled for May 20, 2013 with carryover to May 21,	View File

4/18/2013	Prefiled Question	2013, prefiled questions were due by April 19, 2013; Board and staff have reviewed comments and posed questions attached as Attachment A to this order Pre-Filed Questions of the Illinois Environmental Protection Agency by Illinois Association of Aggregate Producers (electronic filing)	View File
4/17/2013	Other	Certificate of publication; published in the State Journal-Register on April 12, 2013	View File
4/8/2013	Hearing Officer Order/Correspondence	*Notice of Hearing: Hearing scheduled for May 20, 2013, and May 21, 2013 if necessary, at 10:30 am in Sangamo Room, Illinois Environment Protection Agency, 1021 N. Grand Avenue East, Springfield, IL * * * * * Hearing Officer Order: Hearing scheduled for May 20, 2013, and may continue through May 21, 2013 if necessary, must prefile questions by April 19, 2013, must prefile questions and testimony by May 13, 2013, MAIL BOX RULE DOES NOT APPLY	View File
3/21/2013	Opinion and Order	Opinion and Order of the Board by D. Glosser: Board will hold Groundwater Monitoring hearings	View File
3/21/2013	Hearing Officer Order/Correspondence	*Prehearing Video and Teleconference: Scheduled for April 4, 2013, at 2:00 pm at 100 W. Randolph, Board Conference Room, Room 11-512, Chicago, IL AND 1021 N. Grand Avenue East, Pollution Control Board Hearing Room, Springfield, IL, to schedule hearings and discuss how to proceed, looking at hearing dates after May 16 and before June 17, 2013	View File
12/5/2012	Public Comment	*Comments of Emily McAsey, Illinois State Representative (PC# 64) (submitted electronically on November 28, 2012, docketed as PC# 53)	View File

12/3/2012	Public Comment	*Office of the Attorney General's Public Comments Regarding the Necessity for Groundwater Monitoring (PC# 63) (electronic filing)	View File
12/3/2012	Public Comment	*Environmental Protection Agency's Comments on Groundwater Monitoring (PC# 62) (electronic filing)	View File
12/3/2012	Public Comment	*Comments of James W. Glasgow, State's Attorney of Will County (PC# 61) (electronic filing)	View File
11/30/2012	Public Comment	*Comments of Keith Harley, Attorney for Citizens Against Ruining the Environment (PC# 60) (203 Pages, 11.3 MB)	View File
11/30/2012	Public Comment	*Comments of James E Huff of Huff & Huff (PC# 59)	View File
11/30/2012	Public Comment	*Comments of Brian Lansu of Land Reclamation & Recycling Association (PC# 58)	View File
11/30/2012	Public Comment	*Comments of Marcella M. DeMauro, Executive Director, Forest Preserve District of Will County (PC# 57)	View File
11/29/2012	Public Comment	*Comments of Christine Radogno, Illinois Senate Republican Leader (PC# 56)	View File
11/29/2012	Public Comment	*Comments of Lawrence M. Walsh, Will County Executive and James G. Moustis, Will County Board Chairman (PC# 55)	View File
11/28/2012	Public Comment	*Comments of State Representative Renee Kosel (PC# 54)	View File
11/28/2012	Public Comment	*Comments of Illinois Representative Emily McAsey (PC# 53)	View File
11/28/2012	Public Comment	*Comments of Illinois Representative Lawrence 'Larry' M. Walsh, Jr. (PC# 52)	View File
11/28/2012	Public Comment	*Comments of Illinois Representative Tom Cross (PC# 51)	View File
11/28/2012	Public Comment	*Comments of Senator Pat McGuire (PC# 50)	View File
11/26/2012	Public Comment	*Comments of Jenny Skufca, Natural Areas Defense Specialist, Illinois Nature Preserves Commission (PC# 49)	View File

10/16/2012	Public Comment	*Comments of Pat Metz, Industrial Health Specialist, Office of Public Utilities, City of Springfield, Illinois (PC# 48)	View File
9/21/2012	Hearing Officer Order/Correspondence	*Hearing Officer Order: Board opens a public comment period through December 1, 2012 as to whether or not the Board should amend CCDD rules to include groundwater monitoring and, if so, what other changes should be made	View File
8/29/2012	DCEO / Sec. of State	*SOS: Joint Committee on Administrative Rules Statement of Recommendation; Published in Ill. Reg. Vol. 36 Issue 35, p. 13732 on August 31, 2012	View File
8/23/2012	Opinion and Order	Opinion and Order of the Board by D. Glosser: Adopted Rule, Final Opinion & Order to amend the Board's rules for Clean Construction or Demolition Debris Fill Operations. In response to Joint Committee on Administrative Rules recommendation; the Board agrees to open Subdocket B to consider groundwater monitoring.	View File

Service List

<u>Party Name</u>	<u>Address</u>	<u>City/State/Zip</u>	<u>Phone/Fax</u>
<u>Office of the Attorney General</u> Interested Party	69 West Washington Street, Suite 1800	Chicago IL 60602	312-814-2634 312-814-2347
<ul style="list-style-type: none"> Matthew J. Dunn Stephen Sylvester - Asst. Attny. Genl. 			
<u>Brown, Hay & Stephens LLP</u> Interested Party	205 South Fifth Street, Suite 700 P.O. Box 2459	Springfield IL 62705-2459	217/544-8491 217/241-3111
<ul style="list-style-type: none"> Claire A. Manning 			
<u>IEPA</u> Petitioner	1021 North Grand Avenue East P.O. Box 19276	Springfield IL 62794-9276	217/782-5544 217/782-9807
<ul style="list-style-type: none"> Kimberly A. Geving - Assistant Counsel Mark Wight - Assistant Counsel Stephanie Flowers - Assistant Counsel 			

<u>Sorling, Northrup, Hanna, Cullen & Cochran, Ltd.</u> Interested Party <ul style="list-style-type: none">James M. Morphew	1 North Old State Capitol Plaza, Suite 200 P.O. Box 5131	Springfield IL 62705	217/544-1144 217/522-3173
<u>Klein, Thorpe and Jenkins, Ltd.</u> Interested Party <ul style="list-style-type: none">Dennis G. WalshGregory T. Smith	20 North Wacker Drive Suite 1660	Chicago IL 60606-2903	312/984-6400 312/984-6444
<u>Waste Management of Illinois</u> Interested Party <ul style="list-style-type: none">Dennis M. Wilt - Vice President & Area GenMichelle A. Gale	720 East Butterfield Road	Lombard IL 60148	
<u>Seyfarth Shaw LLP</u> Interested Party <ul style="list-style-type: none">Jeryl L. OlsonCraig B. Simonsen - ParalegalPhillip L. Comella	131 South Dearborn Street Suite 2400	Chicago IL 60603-5803	312/460-5000 312/460-7000
<u>Chicago Legal Clinic, Inc.</u> Interested Party <ul style="list-style-type: none">Keith I. Harley	211 West Wacker Drive Suite 750	Chicago IL 60606	312/726-2938 312/726-5206
<u>City of Chicago</u> Interested Party <ul style="list-style-type: none">Doris McDonald - Asst. Corp. Counsel	Chicago Department of Law 30 North LaSalle St., Suite 1400	Chicago IL 60602	312/742-0330 312/744-6912
<u>Illinois Association of Aggregate Producers</u> Interested Party <ul style="list-style-type: none">John Henrickson - Executive Director	1115 S. Second Street	Springfield IL 62704	217/241-1639
<u>Illinois Department of Natural Resources</u> Interested Party <ul style="list-style-type: none">Mitchell Cohen - General Counsel	One Natural Resources Way	Springfield IL 62702-1271	217/782-1809 217/524-9640
<u>IDOT</u> Interested Party <ul style="list-style-type: none">Steven Gobelman - Geologic/Waste Assessment Specialist	2300 S Dirksen Parkway	Springfield IL 62764	217/785-4246
<u>City of Chicago - Mayor's Office of Intergovernmental</u>	121 N. LaSalle Street	Chicago IL 60602	312/744-2597

<u>Affairs</u> Interested Party	City Hall - Room 406		
<ul style="list-style-type: none"> Tiffany Chappell 			
<u>Huff & Huff, Inc.</u> Interested Party	915 Harger Road, Suite 330	Oak Brook IL 60523	630-684- 9100
<ul style="list-style-type: none"> James Huff - Vice President 			
<u>Will County Land Use Department</u> Interested Party	58 E. Clinton Street Suite 500	Joliet IL 60432	815-774- 7891
<ul style="list-style-type: none"> Dean Olson - Director 			
<u>Land Reclamation & Recycling Association</u> Interested Party	2250 Southwind Blvd.	Bartlett IL 60103	
<ul style="list-style-type: none"> Brian Lansu - Attorney Greg Wilcox - Executive Director 			
Total number of participants: 16			

Notice List

<u>Party Name</u>	<u>Address</u>	<u>City/State/Zip</u>	<u>Phone/Fax</u>
<u>Pedersen & Houpt</u> Interested Party	161 North Clark Street Suite 3100	Chicago IL 60601-3224	312/261- 2149 312/261- 1149
<ul style="list-style-type: none"> Donald J. Moran 			
<u>Joint Committee on Administrative Rules</u> Interested Party	Wm. G. Stratton Office Building Room 700	Springfield IL 62706-4700	217/785- 2254 217/785- 8998
<ul style="list-style-type: none"> Vicki Thomas - Executive Director Deborah Connelly 			
<u>Sierra Club</u> Interested Party	70 E. Lake Street, Suite 1500	Chicago IL 60601-7447	
<ul style="list-style-type: none"> Cynthia Skrukud 			
<u>Andrews Environmental Engineering</u> Interested Party	3300 Ginger Creek Drive	Springfield IL 62711	
<ul style="list-style-type: none"> Kenneth W. Liss 			
<u>Stantec</u> Interested Party	3223 S Meadowbrook Rd	Springfield IL 62711	217/698- 7247
<ul style="list-style-type: none"> * 			
<u>CICI</u> Interested Party	1400 E. Touhy Ave, Suite 110	Des Plaines IL 60018	847-544- 5995
<ul style="list-style-type: none"> Lisa Frede 			

<u>Illinois Department of Transportation</u> Interested Party	2300 S. Dirksen Parkway Room 302	Springfield IL 62764	
<ul style="list-style-type: none"> Ellen Schanzle Haskins 			
<u>Illinois Society of Professional Engineers</u> Interested Party	100 East Washington	Springfield IL 62704	217-544-7424 217-525-6545
<ul style="list-style-type: none"> Kim Robinson 			
<u>Doris Susan McDonald</u> Interested Party	30 N. La Salle St. Ste. 900	Chicago IL 60602	312/742-0306
<ul style="list-style-type: none"> * 			
<u>Land and Lakes Company</u> Interested Party	21900 S. Central Ave	Matteson IL 60433	708/720-7029
<ul style="list-style-type: none"> Charlene Troyer - Environmentla Compliance Mananger 			
<u>DuPage County Division of Transportation</u> Interested Party	Jack T. Knuepfer Admin. Bldg. 421 N. County Farm Road	Wheaton IL 60187	630/407-6900
<ul style="list-style-type: none"> John Kos 			
<u>Plote Construction, Inc.</u> Interested Party	1100 Brandt Drive	Hoffman Estates IL 60192	
<ul style="list-style-type: none"> Mike Waller 			
<u>Underground Contractors Association of Illinois</u> Interested Party	500 Park Blvd. Suite 154C	Itasca IL 60143	630/467-1919
<ul style="list-style-type: none"> Elizabeth Van Holt 			
<u>WRS Infrastructure & Environment, Inc.</u> Interested Party	6620 Bellflower Court	Springfield IL 62711	217/726-7002
<ul style="list-style-type: none"> Richard Scott 			
<u>Metropolitan Water Reclamation District of Greater Chicago</u> Interested Party	100 E. Erie Street	Chicago IL 60611	312/751-6587
<ul style="list-style-type: none"> Margaret Conway - Principal Assistant Attorney Ronald M. Hill - General Counsel 			

<u>City Water Light and Power</u> Interested Party	800 East Monroe	Springfield IL 62757	217/789-2116
<ul style="list-style-type: none"> Christine G. Zeaman 			
<u>Jennifer Wolfenden</u> Interested Person	360 Route 206	Flanders NJ 07836	973-252-2504
<ul style="list-style-type: none"> * 			
<u>Right Pointe Company</u> Interested Party	234 Harvestore Drive P.O. Box 467	DeKalb IL 60115	
<ul style="list-style-type: none"> George Connell 			
<u>Will County Land Use Department</u> Interested Party	58 E. Clinton Street Suite 500	Joliet IL 60432	815-774-7891
<ul style="list-style-type: none"> Dean Olson - Director 			
<u>IL State Rep Larry Walsh Jr</u> Interested Party	121 Springfield Ave	Joliet IL 60435	8157308600
<ul style="list-style-type: none"> Larry Walsh Jr 			
<u>Illinois State Senator Don Harmon</u> Interested Person	6933 W. North Ave	Oak Park, IL 60302	708 848-2002
<ul style="list-style-type: none"> Don Harmon 			
<u>Illinois State Rep. Timothy L. Schmitz</u> Interested Person	127 Hamilton Street Suite D	Geneva IL	630-845-9590
<ul style="list-style-type: none"> Timothy L. Schmitz 			
<u>Illinois State Senator Pamela Althoff</u> Interested Party	1 N. Virginia Street	Crystal Lake IL 60014	815-455-6330
<ul style="list-style-type: none"> Pamela Althoff 			
<u>Illinois State Senator Tony Munoz</u> Interested Person	1836 W. 35th Street	Chicago IL 60609	773-869-9050
<ul style="list-style-type: none"> Tony Munoz 			
<u>Illinois State Senator Sue Rezin</u> Interested Person	103 5th Street P.O. Box 260	Peru IL 61354	815-220-8720
<ul style="list-style-type: none"> Sue Rezin 			
<u>Illinois State Senator Dale A. Righter</u> Interested Person	88 Broadway Suite 1	Mattoon IL 61938	217-235-6033
<ul style="list-style-type: none"> Dale A. Righter 			

Illinois State Senator Ira Silverstein Interested Person	2951 W. Devon	Chicago IL 60659	773-743- 5015
• Ira Silverstein			
Illinois State Rep. Gregory Harris Interested Person	1967 W. Montrose Ave	Chicago IL 60613	773-348- 3434
• Gregory Harris			
Illinois State Rep. Louis L. Lang Interested Person	4121 Main Street	Skokie IL	847-673- 1131
• Louis L. Lang			
Illinois State Rep. David L. Leitch Interested Person	5407 N. University Street Arbor Hall, Suite B	Peoria IL 61614	309-690- 7373
• David L. Leitch			
Illinois State Rep. Donald L. Moffitt Interested Person	64 S. Prarie Street Suite 5	Galesburg IL 61401	309-343- 8000
• Donald L. Moffitt			
Illinois State Rep. Andre Thapedi Interested Person	371 E. 75th Street	Chicago IL 60619	773-873- 4444
• Andre Thapedi			
Total number of participants: 32			

Scheduled Hearings

<u>Hearing Date/Time</u>	<u>Location</u>	<u>City & State</u>
5/21/2013 10:30 AM	Sangamo Room, Illinois Environment Protection Agency-CANCELLED	Springfield, IL
5/20/2013 10:30 AM	Sangamo Room, Illinois Environment Protection Agency	Springfield, IL

Appeals on File

No appeals on file