

# Illinois Chapter of the AIPG

American Institute of Professional Geologists

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March 27, 2000

Illinois Environmental Protection Agency  
Bureau of Land  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

Attn: Mr. Doug Clay

RE: Comments on Proposed Changes to  
35 IAC Part 732

Dear Doug,

This is being sent in reply to your letter dated February 8, 2000 and your telephone conversation with Monte Nienkerk on February 18, 2000. Your February 8 letter was in response to our letter of December 22, 1999 regarding the proposed amendments to 35 Ill. Adm. Code, Part 732 and our suggested changes to the draft amendments.

In your reply, you indicated that the Agency has made a number of the changes that we suggested but that there were some suggested changes the Agency did not feel could be made. We are requesting that the Agency reconsider one of our suggested changes that the Agency did not make.

We suggested inserting Licensed Professional Geologist into Section 732.409 (a)(2) [see item number 6 of our December 22 letter]. In your February 8 letter you indicated that the Agency did not make this change because it was felt that there may be portions of a Corrective Action Completion Report that are outside what a Professional Geologist can certify to.

We agree that this may be true at many sites. However, we feel that there are sites where the corrective action activities are not limited to professional engineering expertise. For example, a site where the approved corrective action is monitored natural attenuation. Therefore, we respectfully request that the Agency reconsider this issue and insert language similar to that inserted at 732.12(d). Specifically:

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*Section 732.409 (a) (2) The High Priority corrective action completion report shall include, ... .. relied upon by the Licensed Professional Engineer or, to the extent authorized by the Professional Geologist Licensing Act [225 ILCS 725], the Licensed Professional Geologist in reaching the conclusion that the requirements of the Act...*

... ..

Should you have any questions or wish to discuss further, do not hesitate to contact me.

Sincerely,

Ronald St. John, PG  
President  
Illinois Chapter of the AIPG  
Clayton Group Services  
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Downers Grove, IL 60515

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cc: Bill Child  
Gary King

Ec: IL Chapter of the AIPG Members