



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/782-6762

February 8, 2000

Mr. Ronald St. John, P.G.
President, Illinois Chapter of the AIPG
c/o Clayton Group Services
3140 Finley Drive
Downers Grove, Illinois 60515

Dear Mr. St. John:

This letter is in response to your letter of December 22, 1999 regarding the proposed amendments to 35 Ill. Adm. Code, Part 732. As part of your letter you suggest several changes to our draft amendments.

The following is our response to each of your suggested changes:

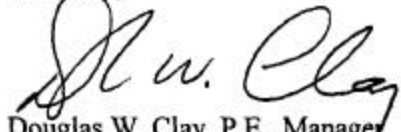
- 1) We did not make any changes to the electronic reporting wording. We will take your comments into consideration at the time we determine the requirements for electronic reporting.
- 2) We did not make the changes you suggested to 732.202(g). This section does allow the extension of the 45 day early action period, but only to the extent needed. We do not agree that a stipulated time extension should be given in all cases. The time extension should be based on the reasonable time needed to perform the early action activities.
- 3) The change was made to 732.307(g)(5) as you proposed.
- 4) We did not make the change to 732.310(h) and (i) that you proposed. However, we have re-written this section and I believe it addresses your issues.
- 5) The changes were made to 732.312(i) as you proposed.
- 6) The change was made to 732.409(b) as you proposed. We did not make the change to 732.409(a)(2) that you proposed. There may be portions of a Corrective Action Completion Report that are outside what a Professional Geologist can certify to. Therefore, this section was not changed.

7) The changes were made to 732.505(b) as you proposed.

8) We did not make the change to 732.312(d) that you proposed. We want to include this wording because the duties that a Licensed Professional Geologist can perform may be more limited than those a Licensed Professional Engineer can perform.

If you have any questions or wish to discuss any of these items further, please contact me at the above referenced telephone number. Thank you for your interest in this matter.

Sincerely,

A handwritten signature in cursive script that reads "D. W. Clay".

Douglas W. Clay, P.E., Manager
Leaking Underground Storage Tank Section
Division of Remediation Management
Bureau of Land