



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 Mary A. Gade, Director

217/524-3300

July 22, 1998

Ms. Mary A. Yelken  
ITRC State Engagement Coordinator  
Nebraska Department of Environmental Quality  
Suite 400, The Atrium  
1200 N Street  
Lincoln, Nebraska 68509-8922

Re: State Concurrence on Five ITRC Work Products  
ITRC File

Dear Ms. Yelken:

This letter is a response to your request for state concurrence regarding the following documents.  
At this time, Illinois concurs with the following levels:

ITRC/MIS-1 *Technical and Regulatory Guidelines for Soil Washing*

Level A - we agree that the requirements are appropriate and commit to using them to the maximum extent feasible.

ITRC/PBW-1 *Regulatory Guidance for Permeable Barriers Designed to Remediate Chlorinated Solvents*

Level A - we agree that the requirements are appropriate and commit to using them to the maximum extent feasible.

ITRC/PBW-2 *Design Guidance for Application of Permeable Barriers To Remediate Dissolved Chlorinated Solvents*

Level A - we agree that the requirements are appropriate and commit to using them to the maximum extent feasible.

ITRC/TD-1     *Technical Requirements for On-Site Low Temperature Thermal Treatment of Non-Hazardous Soils Contaminated with Petroleum/Coal Tar/Gas Plant Wastes*

Level B - we agree that the requirements are appropriate; however, we have an organizational or policy conflict. The Illinois Environmental Protection Agency's Bureau of Air recommends further evaluation as to the Agency's position concerning the use of alternative technologies in the treatment of soils contaminated with coal tar and/or municipal gas plant residues.

ITRC/TD-2     *Technical Requirements for On-Site Thermal Desorption of Solid Media Contaminated with Hazardous Chlorinated Organics*

Level A - we agree that the requirements are appropriate and commit to using them to the maximum extent feasible. It should be noted that the reference to 40 CFR Part 60, Appendix B is incorrect; the reference should be 40 CFR Part 61, Appendix B.

If you have any questions, please feel free to contact Ted Dragovich at 217/524-3300.

Respectfully,



William C. Child, Chief  
Bureau of Land

WCC:<sup>60</sup>BGA:bjh\981744.WPD



State of New Jersey

Department of Environmental Protection

Christine Todd Whitman  
Governor

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OCT. 13 1998

NEBRASKA DEPT OF ENVIRONMENTAL QUALITY  
Robert C. Shinn, Jr.  
Commissioner

OCT 05 1998

Ms. Mary Yelken  
ITRC State Engagement Coordinator  
Nebraska Department of Environmental Quality  
Suite 400, The Atrium  
1200 N Street  
Lincoln, NE 68509-8922

Subject: Concurrence Review of "Technical Requirements For On-Site Thermal Desorption Of Solid Media Contaminated With Hazardous Chlorinated Organics"

Dear Ms. Yelken: *Mary*

The State of New Jersey, Department of Environmental Protection is a member state of the Interstate Technology Regulatory Cooperation Work Group (ITRC).

The Department supports the efforts of the Interstate Technology and Regulatory Cooperation Workgroup (ITRC), to speed the efficient, safe, and effective cleanup of waste sites by accelerating the regulatory acceptance and commercial use of innovative technologies. The state of New Jersey is committed to assist in this effort in whatever way we can, and we look forward to continued cooperation with other states to help us achieve our common goals. Our degree of concurrence with the referenced technology review is described below.

We have evaluated the above-mentioned ITRC document. We agree that the requirements presented in this document are appropriate and we commit to using them in the review and approval of remedial action workplans and remedial action reports for applications of this technology. However, policy conflicts have been identified (see BAQEng attachment). Therefore, a level "b" concurrence option is appropriate (see Concurrence Option attachment).

This document will allow case managers who do not have extensive experience with this technology to establish baseline requirements for the use of this technology on contaminated sites. The "comfort level" in using these guidelines within our Site Remediation Program should be high because the guidelines have been developed and peer-reviewed by regulators from many states.

We are pleased to see that the document allows for site specific flexibility in the application of the technical requirements. This flexibility is essential because the environmental technology field is rapidly developing. We look forward to receiving additional guidance documents from the Interstate Technical and Regulatory Cooperation Workgroup and we wish you the best of luck in your endeavors.

Sincerely,

Robert C. Shinn, Jr.  
Commissioner