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April 30, 2007

Illinois Dunesland Preservation Society
P.O. Box 466
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Attention: Paul A. Kakuris, President

Re:

- Thousands of Pieces of Friable Asbestos Waste Discovered at Park
- Weathered Asbestos Demolition Debris Illegally Burned by IDNR
- Fire Fighters Needlessly Exposed to Asbestos during Spring Field Burns
- Massive Surface Debris "Tip of Iceberg" of Buried Asbestos Waste
- Park Unsafe for Public Access - Immediate Investigation Warranted

Dear Mr. Kakuris:

Thousands of pieces of friable, weathered, and burnt asbestos-containing demolition debris have been discovered at the North Unit of Illinois Beach State Park. Recent Spring field burns conducted in April have uncovered a massive amount of asbestos-containing surface debris. The dangerous asbestos debris is heaving out of the ground. This regulated asbestos waste represents a small fraction of a significantly larger amount of asbestos that has been buried underground in this unrestricted one square mile area of the Park. This open and unsecured, regulated asbestos waste dump, represents an immediate hazard to the public. Park staff and fire fighters who assisted in field burns in this area over the last 30 years have also been exposed to airborne asbestos in violation of State and Federal regulations.

State/Fed's Had Knowledge of Asbestos Debris in Area Prior to Burns

I had identified much of this dangerous waste in May, 2006. Some waste was never removed by the Illinois Department of Natural Resources (IDNR). Documents reveal that the IDNR used improper work practices to remove over 1,700 pieces of friable asbestos debris in this same area in mid-May, 2006. After the insufficient May, 2006 clean-up, I continued to find more regulated waste and reported my findings to you. We even toured Mr. Brad Bradley, the "asbestos expert" from the USEPA, through the site. He found the conditions unacceptable. Complaints by Dunesland during the summer of 2006 resulted in a second clean-up by a licensed asbestos contractor. Unfortunately, much of the asbestos debris from last year was never removed. The remaining asbestos debris, along with new asbestos waste that has heaved from below ground to the surface, was burned in an April, 2007 field burn. ***This is illegal.***

Enough is Enough! Fencing Must Restrict Public Access to Illegal Dump

The IDNR has had knowledge of the presence of regulated asbestos debris in this area for over a decade. The illegal asbestos dump heaves thousands of pieces of friable asbestos debris to the surface each year. This buried, friable, asbestos-containing material is also eroding into Lake Michigan where it washes onto the public beaches to the south. No actions have been taken by state or federal officials to address this chronic source of asbestos exposures to the public, park staff, fire fighters, and others visiting the Illinois Lake Michigan shoreline. ***This area should be immediately restricted to unauthorized personnel and proper remediation conducted under USEPA supervision.***

Regulations Must be Followed to Protect Public – Enforcement Needed!

The use of vague signage by the IDNR to warn an unsuspecting public should be discontinued. State and federal regulators put people in jail for illegal asbestos dumping and burning of asbestos waste. The public would never be allowed access into other areas chronically contaminated with friable asbestos debris. Secure fencing is necessary to protect the public from this extremely large asbestos dump site. **I recommend that the USEPA consider this area to be a Superfund site.** A proper response and clean-up to this asbestos polluted area is beyond the capabilities of the incompetent and careless staff of the Illinois Department of Natural Resources. The asbestos-polluted area requires excavation of the asbestos waste with proper ground cover and fencing. These protections are required everywhere else in the State of Illinois.

Independent Investigation Needed by FBI, Inspector General, and Federal Prosecutors into Apparent Illegal Activities by the IDNR.

The staffers at the IDNR can no longer feign that they are properly handling the chronic appearance of asbestos debris at Illinois Beach State Park. There is a long paper trail which indicates prior knowledge of the asbestos problem and apparently willful actions to “cover-up” a problem which the IDNR created. The IDNR is an illegal polluter. The polluter has had over a decade to clean-up its’ pollution. It is now time for enforcement actions to compel the state of Illinois to properly and promptly clean up the asbestos mess they have created.

I am attaching some photos which do not give justice to the true extent of the chronic surface and sub-surface asbestos problem at Illinois Beach State Park. Please let me know if you have any questions.

Cordially,

Jeffery C. Camplin



Figure 1- Hundreds of Pieces of Shattered Asbestos Debris are found near public pathways at the Park.



Figure 2 - Notice the toxic asbestos fibers protruding along the edges of the friable debris



Figure 3 - Large Pieces of Friable Asbestos heave through the ground where weather and fire release toxic fibers



Figure 4 – Asbestos debris (white material on right side of photo) is mixed with dangerous demolition debris which creates a hazardous environment in unrestricted public areas at Illinois Beach State Park.