



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

(217) 785-2359

December 23, 2008

CERTIFIED MAIL

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Brian H. Martin
AmerenIP
1901 Chouteau Avenue, P.O. Box 66149
St. Louis, Missouri 63166-6149

Re: 0190100008--Champaign County
Champaign/IP Town Gas
Site Remediation Program/Technical Reports

Dear Mr. Martin:

The Illinois Environmental Protection Agency ("Illinois EPA") has completed review of the *Remedial Objectives Report* ("ROR"/Log No. 08/39845) dated December 5, 2008 and the *Remedial Action Plan* ("RAP"/Log No. 08-39845) dated December 2008. The ROR and the RAP, submitted by PSC Industrial Outsourcing, LP, were received by the Illinois EPA on December 12, 2008.

The Illinois EPA approves the ROR with the following comments:

1. The Illinois EPA understands the remediation objectives for the site will be the most stringent remediation objective established in 35 Illinois Administrative Code ("IAC") Part 742 (Tiered Approach to Corrective Action Objectives ("TACO")) or the remediation objectives proposed for the indoor inhalation pathway. Reviewing the tables, many of the compounds have soil migration to groundwater remediation objectives below the project remediation objectives established in Table 7-1. Please explain the discrepancy.
2. For your information, the remediation objectives used in the ROR for the indoor inhalation pathway are remediation objectives proposed by the Illinois EPA for this new pathway. These remediation objectives will not take effect

until the changes to TACO have been adopted by the Illinois Pollution Control Board.

3. Executive Summary – Page ii – The Executive Summary states there are 21 compounds of concern in groundwater, however Tables ES-1 and 3-1 only identify 20 compounds. Please clarify.
4. Page 12 – Soil Attenuation Capacity - The soil samples collected in 1996 for analysis of total organic carbon were not collected using the current method (ASTM Method D2974) and cannot be used to determine soil attenuation capacity. The default value of 2,000 mg/kg below one meter should be used or additional soil samples should be collected for total organic analysis using ASTM Method D2974. The appropriate conversion factor as identified in 35 IAC Part 742.215(b)(1)(B) should be applied to the result. Also, the soil samples should be collected in uncontaminated areas of the site, within the native soil horizon and also analyzed for volatile organic compounds (“VOCs”) and semi-volatile organic compounds (“SVOCs”).
5. Page 13 – PCBs have not been included as a constituent of concern for the No Further Remediation (“NFR”) letter, but the Remedial Action Plan requests a comprehensive NFR letter.
6. Page 19 - The Illinois EPA will require a Class V Injection Well Inventory Form be submitted for the in-situ chemical oxidation activities. The form can be found at <http://www.epa.state.il.us/land/regulatory-programs/permits-and-management/class-v-injection-well-inventory-form.html>. One copy of the form should be mailed to Mr. Bur Filson, UIC Coordinator, Mail Code #24, Illinois EPA, 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. One copy should also be included with the submittal addressing the comments in this letter.
7. Table ES-1 and Table 3-1 are identified on the List of Tables as the constituents for inclusion in the focused NFR letter. However, the Remedial Action Plan requests a comprehensive NFR letter. Please clarify.

The Illinois EPA conditionally approves the RAP provided the above and the below comments have been addressed:

1. The Illinois EPA understands this RAP addresses only the contamination located within the boundaries of the remediation site as identified in the Illinois EPA’s Site Remediation Program (“SRP”). Any off-site contamination issues will need to be addressed as separate sites enrolled in the SRP.
2. The Illinois EPA understands the remediation objectives for the site will be the most stringent remediation objective established in 35 Illinois Administrative Code (“IAC”) Part 742 (Tiered Approach to Corrective Action Objectives

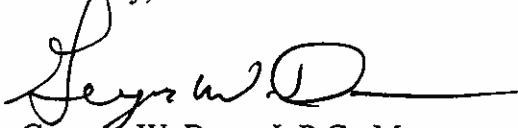
("TACO")) or the remediation objectives proposed for the indoor inhalation pathway. Reviewing the tables, many of the compounds have soil migration to groundwater remediation objectives below the project remediation objectives established in Table ES-2 and Table 2-1. Please explain this discrepancy.

3. Figure 2-3 through Figure 2-5 identify the extent of contamination exceeding either the soil ingestion, soil inhalation, soil migration to groundwater, indoor inhalation or groundwater. The extent of contamination is depicted on these figures as remaining on-site although the Illinois EPA recognizes there are off-site exceedances. The maps should clearly state the exceedances are for on-site only and off-site contamination exists which will be addressed individually with off-site property owners.
4. The Illinois EPA does not review health and safety plans. However, any health and safety plan prepared and submitted to the Illinois EPA should be consistent with the Occupational Safety and Health Administration regulations.
5. The Illinois EPA understands certain details of the Remedial Action Plan are still under discussion or being finalized. Once this information (such as the disposal facility for the soil, truck routes, water discharge permit, etc.) is finalized, please forward the information onto the Illinois EPA.
6. Page 11 – The backfill material brought to the site for the excavated areas shall be sampled and meet the Tier 1 residential remediation objectives.
7. Certain chemical oxidation reactions precipitate out additional metals after treatment. To verify these metals do not exceed remediation objectives, the confirmation soil and groundwater samples from the in-situ chemical oxidation areas should also be analyzed for all the inorganics in 35 Illinois Administrative Code Part 740 Appendix A, Table D.)

All future submittals to the Illinois EPA should include three (3) copies of each document.

If you have any questions, please feel free to contact me at above telephone number, address or e-mail me at Greg.Dunn@illinois.gov.

Sincerely,



Gregory W. Dunn, L.P.G., Manager
Voluntary Site Remediation Unit B
Remedial Project Management Section
Division of Remediation Management
Bureau of Land

cc: Derek Ingram
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