217/782-6761

November 5, 1997

Certified # 363 547 957

Brian H. Martin, CHMM Illinois Power Company 500 South 27th Street P.O. Box 511 Decatur, Illinois 62525-1805

Re: 0190100008-Champaign County

IP Town Gas/Champaign

Site Remediation Program/Tech. File

Dear Mr. Martin:

Thank you for submitting the documents entitled "Interim Remedial Measures Work Plan, Source Removal, Champaign Former Manufactured Gas Plant" (log No. 97-1312) (Work Report) and the "Ambient Air Monitoring Plan Former Champaign Manufactured Gas Plant Interim Remedial Measures-Source Removal" (log No. 97-1312) (Air Report) documents dated October 1, 1997 and received by the Illinois Environmental Protection Agency (Illinois EPA) on October 2, 1997. The Illinois EPA has completed review of the subject reports, and based on that review, the Air Report is approved and the Work Report is conditionally approved pending the following items are addressed to the Illinois EPA's satisfaction.

- 1. Section 1.0, Page 1. The text describes a test trench that will be installed about 80 feet east of former gas holder (GH) 1. The purpose of this trenching is to locate unidentified below-grade structures. The proposed trench should be shown in Figure 1. Also, the purpose of the trenching should be more clearly stated in the text.
- 2. Section 1.1, Page 2. Two additional GHs (GH 2 and GH 3) are referenced, but these and other former structures are not shown in Figure 1. An additional figure should be included in the work plan that shows all former site structures. A suitable base map can likely be found in the remedial investigation report prepared by Burlington Environmental in 1994.

- 3. Section 3.2, Page 8. The text does not clearly identify the specific blending approach that will be used for tar holder waste, although it appears that the methodology proposed for GH 1 will also be used for the tar holders. The text should be revised to clarify this matter.
- 4. **Section 4.3, Page 10.** The text states that 134,000 gallons of wastewater may be removed from GH 1. However, only three Baker Tanks, each with a capacity of 21,000 gallons, are proposed for initial use at the site. The text should indicate how wastewater in excess of the amount that can be stored in the tanks will be managed as it is removed from GH 1 or other areas of the site.

If you have any questions, please contact me at 217/785-8724 or our new address at 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794.

Sincerely,

Andrew Frierdich, EIT Site Remediation Program

Remedial Project Management Section

Bureau of Land

ARF:arf

cc: Philip Environmental Services Corporation 201 West Sand Bank Road P.O. Box 230 Columbia, IL 62236-0230

> Tetra Tech EM Inc. Attn: Tom Hahne 200 East Randolph Drive, Suite 4700 Chicago, Illinois 60601