November 7, 2022

Mr. Paul Lake
Illinois Environmental Protection Agency
Bureau of Land - Remedial Project Management Section
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Re: Long-Term Stewardship Plan – Groundwater Pump & Treat System
917 South Webster Street
Taylorville Former Manufactured Gas Plant
LPC #170000173096 – Christian County

Dear Mr. Lake:

On behalf of Ameren, Environmental Resources Management (ERM) has prepared a Long-Term Stewardship Plan – Groundwater Pump & Treat System (LTSP), dated November 7, 2022, for the former manufactured gas plant (FMGP) site at 917 South Webster Street in Taylorville, Illinois. The LTSP has been prepared at the request of the Illinois EPA.

Ameren appreciates your assistance and cooperation as we proceed with this project. If you have any questions regarding the responses provided, or need additional information, please feel free to contact me.

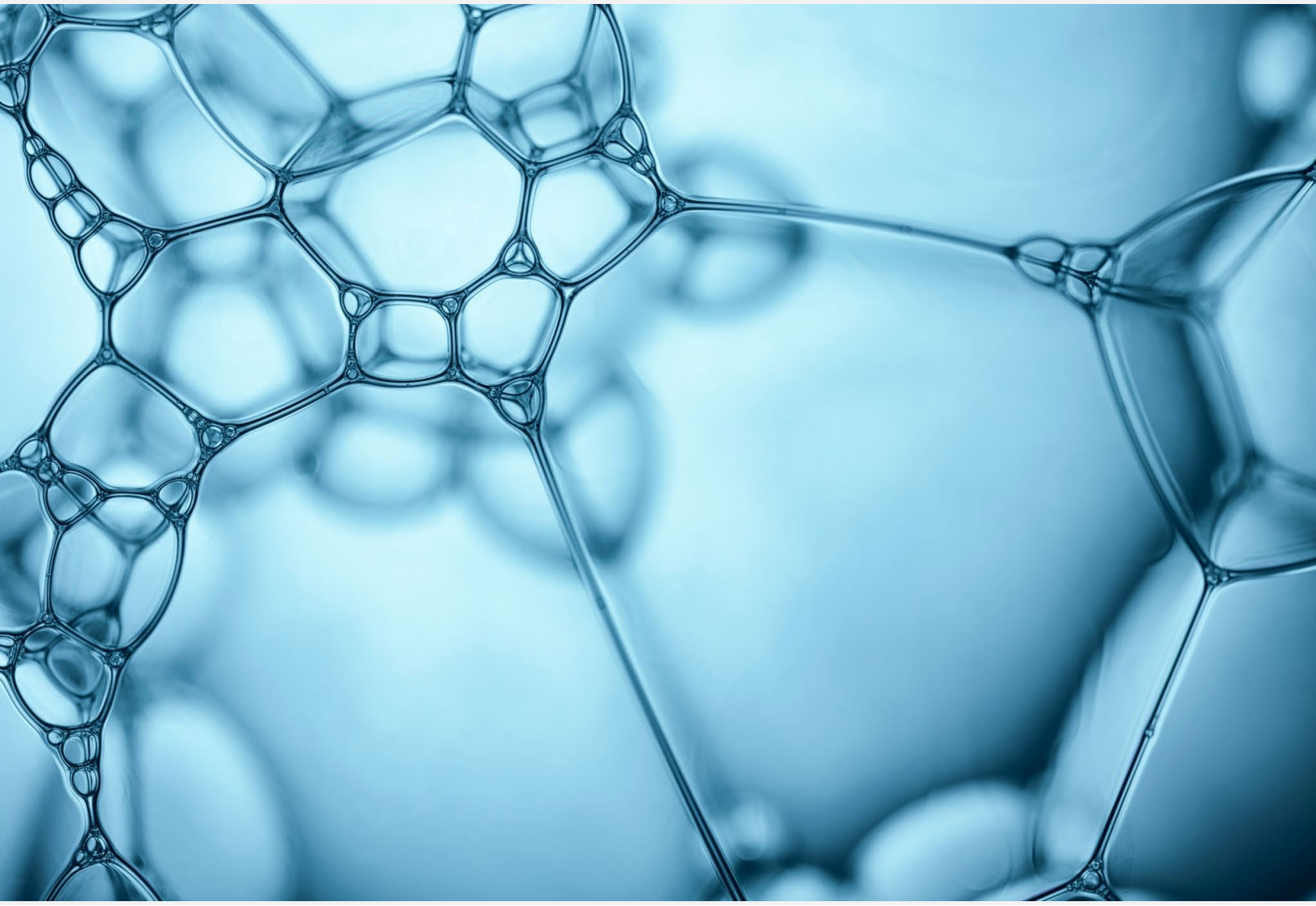
Respectfully,

Dave Palmer, PG, PMP, EVMP
Manager, Remediation Projects
Ameren Services

Attachment

Attachment

Long-Term Stewardship Plan – Groundwater Pump & Treat System,
dated November 7, 2022



Long-Term Stewardship Plan – Groundwater Pump & Treat System

Ameren CIPS Site, Taylorville IL

November 2022

Project No.: 0638675

The business of sustainability

ERM

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ABBREVIATIONS

ACLs	alternate cleanup levels
ARAR	applicable or relevant and appropriate requirements
bgs	below ground surface
BTEX	benzene, toluene, ethylbenzene and xylene
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CIPS	Central Illinois Public Service
COC	constituent of concern
EC	Environmental Covenant
EPA	U.S. Environmental Protection Agency
ERM	Environmental Resources Management, Inc.
ESD	Explanation of Significant Differences
FOC	fraction of organic carbon
ft/day	feet per day
ft/ft	foot per foot
gpm	gallons per minute
GW	groundwater
IC	institutional control
ID	identification number
IEPA	Illinois Environmental Protection Agency
IL	Illinois
ISCO	in-situ chemical oxidation
ISS	in-situ stabilization and solidification
LTSP	Long-Term Stewardship Plan
mg/L	milligrams per liter
MGP	manufactured gas plant
MNA	monitored natural attenuation
MS/MSD	matrix spike / matrix spike duplicates
NELAP	National Environmental Laboratory Accreditation Program
NPL	National Priorities List
O&M	operation and maintenance
OSWER	Office of Solid Waste and Emergency Response, USEPA
PAHs	polycyclic aromatic hydrocarbons
P&T	pump & treat
PID	photo-ionization detector
PPE	personal protective equipment
QA/QC	quality assurance / quality control
QAPP	Quality Assurance Project Plan
RA	remedial action
RAO	remedial action objective
RD/RA	remedial design / remedial action

REC	recognized environmental condition
RO	remediation objective
ROD	Record of Decision
SRP	Site Remediation Program, IEPA
SVOC	semi-volatile organic compound
TACO	Tiered Approach to Corrective Action Objectives, IEPA
TBC	to-be-considered
TCL	Target Compound List
USEPA	U.S. Environmental Protection Agency
VOC	volatile organic compound

1. INTRODUCTION

This Long-Term Stewardship Plan (LTSP) presents a strategy for maintaining, monitoring, and reporting on the institutional controls (ICs) and remedial systems established for the Central Illinois Public Service (CIPS) Site, located at 918 Webster Street in Taylorville, Illinois. The Site is owned by Ameren Services (Ameren).

The Site has undergone remedial action (RA) under Section 104 of Comprehensive Environmental Response Compensation Liability Act (CERCLA) and is currently being remediated under the oversight of the Illinois Environmental Protection Agency (IEPA) in consultation with the U.S. Environmental Protection Agency (USEPA). The Site was added to the National Priorities List (NPL) in the Federal Register on August 30, 1990. In 1992, a Record of Decision (ROD) (USEPA 1992) was put in place for the Site requiring remediation of impacted groundwater at the Site. Remedial actions have included excavation of soil and sediment, in-situ chemical oxidation (ISCO) of secondary sources, and the installation of a pump & treat (P&T) groundwater remediation system at the Site. ICs have been placed on the Site. The ICs include prohibition of groundwater use and requirements regarding the handling of soil and groundwater at the Site.

Environmental Resources Management, Inc. (ERM) was retained by Ameren to prepare this LTSP to describe the long-term stewardship activities that accompany the current groundwater remediation program, primarily the quarterly monitoring of groundwater at and in the surrounding area of the Site.

1.1 Purpose

The purpose of this LTSP is to define the stewardship activities that are necessary to maintain compliance with the ICs and operate the P&T system until it is no longer needed or effective at removing subsurface impacts.

1.2 Background Institutional Controls

For purposes of this guidance, USEPA defines ICs as non-engineered instruments, such as administrative and legal controls, which help to minimize the potential for exposure to contamination and/or protect the integrity of a response action. As response components, IC instruments generally are designed to achieve the precise substantive use restrictions articulated in the decision documents that are needed to help achieve the site's overall cleanup objectives.

1.3 Report Organization

The following summarizes the organization of the LTSP:

- Section 1 – Introduction: This section introduces the purpose of the LTSP and report organization.
- Section 2 – Site Background: This section describes the Site and summarizes the major remedial actions conducted.
- Section 3 – Long-Term Stewardship: This section describes the groundwater monitoring program.
- Section 4 – Reporting: This section describes the reporting requirements to document compliance with the ICs.
- Section 5 - Communication Plan: This section describes the current contacts for Ameren, ERM, and IEPA.

- Section 6 – Costs: This section describes the estimated annual costs for long-term stewardship and the sources that will provide long-term funding and resources for the Site.
- Section 7 – Conclusion: This section summarizes Ameren's efforts to facilitate long term stewardship of the Site.
- Section 8 – References: This section provides references for reports cited throughout the LTSP.

2. SITE BACKGROUND

The Site is the location of a former manufactured gas plant (MGP) that has undergone remedial activities, including excavation, ISCO activities, and groundwater P&T for more than 27 years in an effort to address constituents typically associated with MGP waste. Groundwater monitoring has been occurring at the Site since 1986, and influent, mid-process, and effluent monitoring associated with the P&T system has been occurring at the Site since 1995.

2.1 Site Location

The Site is located at 917 South Webster Street in Taylorville, Christian County, Illinois (Site) as presented in Figure 1. The Site is owned by Ameren.

2.2 Site History

The Site, which is a portion of the parcel located at 917 South Webster Street (Christian County Parcel ID: 17-13-27-331-005-00), is the location of a former MGP that was constructed in 1892 and was operated by the Taylorville Gas and Electric Company until it was purchased in 1912 by CIPS. CIPS operated the MGP from 1912 until 1932. Contamination at the Site was initially discovered in 1985 during septic tank work.

Demolition and removal of former gas plant structures above and below ground, excavation, and off-Site disposal of source material was conducted in 1987. The Site was proposed to the National Priorities List on June 27, 1988. The Site was then designated as a "State-Lead" enforcement case through negotiations between IEPA and USEPA Region V. Following excavation, the principal constituents of concern (COCs) in Site groundwater were determined to be those historically associated with MGP waste - benzene, naphthalene, and polycyclic aromatic hydrocarbons (PAHs). P&T activities were initiated and continue to this day. A series of ISCO injections were performed in the early/mid 2000s. Monitored natural attenuation (MNA) has also been evaluated for the Site. Groundwater monitoring has been conducted for more than 30 years and continues to the present day. Groundwater monitoring wells are located both at the Site and within the surrounding area, as shown on Figure 2 and Figure 3.

2.3 Regional Geology and Hydrogeology

Site geology consists of loess (wind-blown glacial deposits) composed of fine sand, silt, and clay ranging from five to ten feet in thickness. The loess material is underlain by a sand and gravel unit deposited as a glacial esker expressed as a broad ridge oriented in a northeast to southwest direction across central Illinois. This sand and gravel unit extends approximately 90 feet below ground surface (bgs) to limestone and dolomite bedrock. The loess readily allows precipitation to infiltrate to the sand and gravel unit below. Groundwater at the Site has been historically gauged from 13 to 18 feet bgs.

2.4 Hydrogeology

Ameren has been monitoring groundwater quality in wells on and offsite since 1986 and conducting P&T activities at the Site since 1995. A minimum of 21 monitoring wells are sampled quarterly for benzene, toluene, ethylbenzene and xylene (BTEX) and PAHs. Once per year the sampling program is expanded to include ten additional wells (31 total) for the same parameters. Two monitoring wells (GW-25 and GW-26) were installed in January 2020 to provide additional monitoring locations downgradient of the Site. Of the 31 wells currently being monitored, eight wells are located onsite (GW-2, GW-3, GW-4R, GW-7, GW-14, GW-15, GW-22S, and GW-22D); one well is located in another area of the Site's parent parcel (GW-

1); and 22 wells are located offsite, including 11 wells which are located immediately downgradient of the Site.

Direction and Extent of Groundwater Flow:

Long-term monitoring of the existing wells has shown that localized groundwater flow from the Site is to the south-southwest. The sand and gravel esker deposits underneath the Site are part of a larger aquifer in the region. Regionally, groundwater flow in this aquifer parallels the general southwesterly trend of the esker. East and west of the esker ridge surficial deposits generally consist of loess and till.

The unconfined groundwater gradient is generally flat when the groundwater pump and treat system is not in operation. Natural groundwater gradients increase near Seaman Estates Pond and the Sangamon River. The average ambient groundwater velocity at the Site was calculated at 0.3 feet per day (ft/day) using a calibrated groundwater model with inputs of hydraulic conductivity (66 ft/d), horizontal gradient (0.0014 foot per foot [ft/ft]), and porosity (0.3).

Groundwater has been monitored at the Site since 1986, which includes the time period prior to P&T activity, which began in 1995. Consequently, the pre-pumping conditions defined by the pre-1995 monitoring likely represent steady state conditions for Site COCs in groundwater. During this time, impacted groundwater has remained on or near the Site, with GW-17 being the furthest down-gradient monitoring well with a measured groundwater COC concentration exceeding its ROD Cleanup Criteria. This was for bis(2-ethylhexyl)phthalate in May 2018. Several volatile organic compounds (VOCs) and PAHs remain above cleanup criteria in two monitoring wells within the system onsite. GW-3 and GW-4R historically have remained above cleanup criteria for benzene and naphthalene. After a 22-month shutdown from September 2017 to June 2019, benzene and naphthalene levels dropped significantly during this time.

2.5 Current and Post Remediation Property Use

The Site is currently located within a fenced parcel owned by Ameren. The auxiliary areas of the parent parcel are utilized for the P&T facility and storage of remediation support materials. There is also an area of this parcel that consists of a former laydown yard for Ameren Illinois. There are currently no employees at the Site or at the parent parcel other than those that visit the Site to conduct sampling and/or maintenance of the wells and associated P&T facility structures.

It is anticipated that once remediated, the Site and its parent parcel can be redeveloped to potentially provide a park or green space within the City of Taylorville. Ameren will retain deed restrictions on the property that prohibit future residential use of the Site and parent parcel and the use of groundwater from the Site and its parent parcel for potable purposes.

2.6 Historical Activities

Beginning in 1986, groundwater, surface water, and sediment sampling is conducted for VOCs, semi-volatile organic compounds (SVOCs) including PAHs, and metals at the Site. Elevated VOCs and SVOCs were detected in Site soil and in a drainage swale adjacent to the south of the Site.

From January 1987 to March 1987, a removal action was conducted by CIPS at the Site under IEPA's oversight, to excavate and dispose of approximately 12,000 cubic yards of impacted soil down to the water table. This remedial effort was completed in an effort to address source material at the Site, as well as impacted sediments in the offsite drainage swale.

In October 1987, Ameren provided a permanent alternative water supply to approximately 20 residents and plugged and abandoned associated private drinking water wells.

On September 30, 1992, the ROD for the Site was established to address the potential threats to human health and the environment, primarily via ingestion of impacted groundwater, discharge of COCs to surface waters, and migration of impacted groundwater off-site. Ingestion of impacted groundwater at the Site was determined to be the primary risk driver to human health effects. As outlined in the ROD and shown in the table below, the selected remedy for the Ameren Taylorville MGP Site included:

1992 ROD Requirement	Requirement Status
Extension of an alternate water supply to area residents.	Completed - *This was completed in 1987. Residents have also been connected to the municipal water system and the City of Taylorville has an ordinance (Ordinance 3463; adopted May 3, 2010; attached as Appendix C) that requires any new construction in the City of Taylorville to connect to the municipal water system.*
Construction of a chain link security fence around the Site.	Completed - *This was completed in 1987. The fencing was expanded in 1988 and 2021 to include Ameren-owned properties to the south of the Site. The Site's parent parcel and the adjacent downgradient parcels remain fenced.*
Prohibition of groundwater withdrawal for purposes other than remedial action within the Site and areas downgradient of the Site.	Completed – *1) Agreements with downgradient property owners to prohibit the use of groundwater were obtained in the 1987 to 1989 period. Their wells were abandoned, and they were connected to the municipal water system.* *2) The City of Taylorville has an ordinance (Ordinance 3463) prohibiting the use of groundwater for potable purposes.* 3) *In addition, as of 2012, there is an environmental covenant on the Site, the parcel that the Site is located on, and two parcels adjacent to the south of the Site that restrict the use of groundwater. More information is presented in Section 2.6.2.*
Quarterly sampling of groundwater monitoring points.	Completed and Ongoing – *A quarterly groundwater sampling program was implemented prior to 1995 and is ongoing. Weekly influent, mid-process, and effluent sampling associated with the P&T system was initiated in 1995 and is ongoing.*
Completion of engineering design work (geologic, hydrogeologic, treatability pilot studies).	Completed - *The Remedial Design for the P&T facility was approved in 1994.*
Documentation of the prior remedial efforts including excavation of 12,000 cubic yards of soil and sediment; abandonment of drinking water wells supplying water to nearby residents.	Completed - *The removal conducted in 1987 and the closing of wells and supplying residents with alternate water supplies were documented in various reports between 1987 and 2005, including the 1999 Five-year Review report and the 2005 Explanation of Significant Differences (ESD).*
Establishment of an alternate clean-up level (ACL) for each contaminant in groundwater.	Completed - *IEPA determined the ACLs for the remediation of groundwater in 1992 (and is included in the ROD) with one modification in 2005 (as discussed in the 2005 ESD). These became the remedial action objectives (RAOs) for the Site.*

1992 ROD Requirement	Requirement Status
Installation and operation of a groundwater extraction and treatment system.	Completed and Ongoing - *The Remedial Action Consent Decree was signed in 1994 and the P&T system was installed and began operation in 1995.*

On September 30, 1992, USEPA and IEPA also issued a Decision Document that summarized the rationale used to develop ACLs and protective concentration levels (PCLs) for the Site. ACLs were set at the point of compliance which the Decision Document stated was “the vertical physical boundary of the waste management/area” or the Site. The document went on to state that, due to the small size of the Site, the point of compliance can be established at “the southern perimeter of the waste management area”, that is, the edge of the groundwater plume on the Site. PCLs, which are risk-based limits for concentrations of Site contaminants in surface water and sediment where impacted groundwater could come in contact with a potential human or ecological receptor at various points of exposure, were also established.

From 1993 to 2008, surface water, sediment, and fish tissue samples were collected from the Seaman Estates Pond. Sampling results indicated that concentrations of PAHs and pesticides were sporadic and showed no apparent trends. The concentrations of PAHs in surface water within the pond were below the practical quantitation limits and met the State of Illinois surface water discharge limits.

By February 1995, a groundwater extraction and treatment system (P&T system) was installed to address groundwater impacts. The P&T system has operated continuously, except as noted below.

In September 2005, Ameren submitted an ESD which was approved, and:

- Allowed Ameren to conduct a pilot study on an alternate treatment method, oxidant injection into the subsurface, in an attempt to reduce or eliminate the length of operation time of the P&T system;
- Revised the clean-up objectives for benzo(a)pyrene, as a new Maximum Contaminant Level (MCL) had been recently established for this constituent; and
- Updated the clean-up objectives related to surface water and effluent based on new toxicity information.

In October 2006, as part of the examination of alternate treatments, the P&T system was temporarily turned off and a modified Fenton's reagent was injected into the subsurface at the Site to evaluate chemical and biological oxidation of contaminants. The treatment system was shutdown for approximately three months and was restarted in January 2007. Monitoring of groundwater was increased while the P&T system was shut down, and no off-site migration of groundwater contaminants were detected.

On August 30, 2012, Ameren recorded an Environmental Covenant which granted IEPA and USEPA access to the Site and restricted the installation of wells, use and handling of groundwater, and handling of soils on the property. This covenant applies to the entirety of the 2.4-acre parcel on which the Site is located.

In September 2017, the P&T system was turned off and a rebound evaluation was subsequently conducted. The rebound evaluation initially demonstrated that the P&T system was controlling the plume and preventing further migration of contaminants. After two years of not operating the P&T system, a slight increase in COC concentrations was observed and the P&T system was turned back on in July 2019. The source removals and injection activities that Ameren has conducted have significantly reduced groundwater concentrations to levels slightly above the ACLs. The P&T system continues to reduce

groundwater concentrations as indicated by the rebound evaluation conducted in 2007 and by evaluation of the groundwater data collected to date, albeit at a lower rate of contaminant reduction.

2.6.1 Restriction of Site Access

The parent parcel at which the Site is located is fenced with two locked entrance gates: one accessing the parcel from South Webster Street and one accessing the adjacent Ameren-owned parcel to the south from the Site. There are "Authorized Personnel Only", "No Trespassing", or similar signage permanently attached to the fencing surrounding the parcel. Photographs of existing fencing and signage are included in Appendix A.

Access to the parcel is limited to Ameren and its contractor staff that are conducting tasks related to investigation, monitoring, remediation, or lawn/facility maintenance activities.

The two parcels owned by Ameren, adjacent to the south of the Site, are also fenced and signage is posted.

2.6.2 Institutional Controls

ICs are in place on the Site, the Site's parent parcel, and two adjacent parcels to the south of the Site as shown in Figure 4.

There is an environmental covenant (EC), signed on August 20, 2012, between Ameren, IEPA and USEPA that applies restrictions on the on the Site property, the parcel in which it is located, and two[1] parcels adjacent to the south of the Site (included as Appendix B). The covenant states that the restrictions are:

a. *"No Groundwater Usage - The groundwater under the Property shall not be used as a potable supply of water;*

b. *No Groundwater Wells – There shall be no wells installed on the property except for those approved by Illinois EPA;*

c. *Handling of Contaminated Groundwater – Any contaminated groundwater removed from the Property shall be handled in accordance with all applicable laws and regulations as required by the ROD and/or Consent Decree;*

d. *Handling of Soil – As part of the remediation efforts, approximately the top ten feet of soil from the environmentally impacted area has been removed and replaced with clean cover. In the event subsurface soils are removed, excavated, or disturbed from the impacted area depicted in Appendix B (*and included in this report's Appendix B*), such soils should be evaluated and managed in accordance with all applicable laws and regulations."*

This covenant applies to two parcels totaling approximately 21.28 acres. As shown on Figure 4, these include 2.56 acres for the Site's parent parcel (PIN# 17-13-27-331-005-00), at 917 South Webster Street, of which, the Site occupies approximately 0.9 acres; the 15.56-acre combined parcel (PIN# 17-13-27-300-001-00), adjacent and immediately south of the Site's parent parcel; and, to its adjacent south, an approximate 2.74-acre parcel (PIN# 17-13-34-100-010-00). These parcels are all owned by Ameren.

[1] In previous documents, "three parcels" were referenced as being the subject of the EC. The EC applies to two parcels - the previous northernmost two parcels, which are combined into one parcel – PIN# 17-13-27-331-005-00 and its neighboring parcel adjacent to the south – PIN# 17-13-27-300-001-00. Ameren does own a third parcel, to the southeast, across South Webster Street (PIN# 17-13-34-200-003-01), but this third parcel is not included in the EC.

There was an agreement with the property owners along Seaman Estates Pond prohibiting the use of groundwater for consumption and private wells were closed and abandoned.

2.6.3 Determination of RAOs

The site-specific remedial action objectives (RAOs) set by USEPA are presented in Table 12 of the 1992 ROD. These RAOs were modified in 2005, in an ESD for the Site, by changing the RAO for benzo(a)pyrene from 0.00023 mg/L to 0.0002 mg/L based on changes to toxicity information for benzo(a)pyrene and IEPA's promulgating the value in its Site Remediation Program (SRP) and related guidance.

The RAOs set for the groundwater monitoring program are presented in Table 1.

2.6.4 Groundwater P&T System

The 1989 *Groundwater Pump and Treat System Basis of Design Report*, prepared by Hanson Engineers, presented the design of the system and reiterated the goals of the system, which are:

- To prevent contaminants from migrating offsite;
- To remove contaminants from extracted groundwater to level suitable for surface water discharge; and
- To eventually cleanse the aquifer to levels which no longer present a threat to public health.

2.6.4.1 P&T Installation

The P&T facility became operational on July 10, 1995. It was designed and continues to be operated in accordance with the applicable or relevant and appropriate requirements (ARARs) established for the Site. The system consists of two extraction wells located in the central portion of the Site – referred to as the "west well" and "east well". The extraction wells are constructed of 16-inch diameter type 316 stainless steel. The screened portions of the wells extend from five feet above the water table (depth of 15 feet) to the base of the aquifer (depth of approximately 90 feet). The turbine pump used to extract groundwater has a variable speed motor to vary the process flow rate up to 500 gallons per minute (gpm). The process for the extracted groundwater is to then treat with a combination of iron removal; filtration through up to three, parallel bag filters; and filtration through a carbon adsorption system which consists of two granular activated carbon filters, in sequence. Treated groundwater is transported via underground piping (with a directional valve) to discharge at either a point at the top of the drainage swale or a point below the dam of the Seaman Estates Pond. The discharge point can be changed by the switching the valve at the beginning of the piping system.

2.6.4.2 Operation and Maintenance

The contract for the previous operator of the P&T facility, Veolia, ended in 2018. ERM, on behalf of Ameren, retains licensed facility personnel through Environmental Management Alternatives (EMA). These personnel operate the facility for the Site with ERM providing management and environmental support for Ameren. The facility is operated full-time with operation staff present on a daily basis, and report to the Christian County Water Reclamation District.

Pumping and treatment of groundwater occurs 24 hours per day. In 1995, Hanson Engineers determined that pump rates ranging from a minimum flow of 200 gpm to a maximum flow of 500 gpm would be sufficient for hydraulic containment of impacts in groundwater (Hanson 1995). A later evaluation by Hanson Engineers determined that pumping rates as low as 50 gpm would be sufficient for hydraulic containment (USEPA 1999). Pumping rates have been adjusted throughout the 27 years of operation.

Currently the P&T system operates at the lowest rate that is sufficient to provide effective groundwater control and sampling has indicated no exceedances of offsite downgradient wells.

Discharged water is sampled weekly to confirm continued compliance with discharge requirements to meet average and/or daily maximum contaminant concentrations, as set in the 1992 ROD and/or as modified in the 2005 ESD, before discharge from the facility. The maximum contaminant concentrations set for discharged water are the same as the RAOs for groundwater at the Site and are presented in Table 2.

Further discussion of the activities related to the operation and maintenance of the system is presented in Section 3.4.

2.6.4.3 Inspections

As presented in Table 4b, visual inspections of the facility are conducted daily by a facility operator. Influent, mid-process, and effluent groundwater is sampled weekly. A further discussion on inspection activities related to the Site and the P&T facility is presented in Section 3.4.

2.6.5 Groundwater Monitoring Program

The Groundwater Monitoring Program consists of sampling up to 31 wells: eight wells onsite, one well located on the Site's parent parcel, and 22 wells located offsite, with 11 of the 20 wells located downgradient of the Site, within the boundaries of the EC. The network of 31 wells is sampled one quarter per year and a minimum of 21 wells are sampled during the other three quarters of each year. Depths of the wells range from approximately 9.5 ft bgs to 94 ft bgs. No exceedances of COCs have been indicated in adjacent downgradient wells. Concentrations of benzene and naphthalene, above the RAOs have been detected primarily in wells GW-03 and GW-04R, which are located in the southeast portion of the Site.

2.6.5.1 Remedial Action Objectives

The RAOs established in the 1992 ROD and 2005 ESD were utilized for the Groundwater Monitoring Program for the Site. The RAOs are presented in Table 1.

2.6.5.2 Groundwater Sampling and Analyses

Groundwater is collected each quarter by ERM for analyses of the COCs by the offsite laboratory, Teklab, Inc. (Teklab) located in Collinsville, Illinois. A general schedule of quarterly groundwater sampling is presented in Table 3.

As presented in the *Year 2022 Quarter 2 Groundwater Sampling Results, Former MGP Site – Taylorville, Illinois* (ERM 2022a) report, the results of the groundwater sampling conducted in May 2022 indicated that samples collected from two wells have COCs exceeding RAOs. These wells – GW-03 and GW-04R - are located in the southeast corner of the Site. The COCs that have historically exceeded RAOs in samples collected from GW-03 and GW04R are benzene and naphthalene.

Groundwater samples collected from monitoring wells downgradient of the perimeter of the Site, which include shallow wells GW-16S, GW-17, GW-22S, GW-25 and GW-26 and deep wells GW-16D and GW-22D, did not have reported exceedances of RAOs during the May 2022 sampling event.

Low levels of PAHs including benzo(a)pyrene and benzo(b)fluoranthene have historically been detected in well GW-20, which is located approximately 800 feet southeast of the Site. It is likely that these concentrations are coming from another source as no correlation in groundwater sampling results has been observed in monitoring wells between the Site and well GW-20.

Within the monitoring well network groundwater is generally present at depths of 15 to 20 feet below top of casing (BTOC), with the exception of downgradient wells (such as the GW-18 and GW-19 series) where groundwater is shallower (0 to 7 feet below top of casing). Groundwater in the area of the Site is considered Class I groundwater.

For the west and east groundwater extraction wells, groundwater is generally present at 50 to 60 feet bgs under pumping conditions.

2.6.5.3 Reporting

Reporting for the Groundwater Monitoring Program consists of generating quarterly reports of the sampling results. For three quarters per year, the report includes sampling results for up to 19 monitoring wells. For a fourth quarter, in May of each year, the report includes sampling results for up to 29 monitoring wells. The reports are prepared by ERM, submitted to Ameren, and then submitted to the IEPA. The reports include a brief narrative, a table of the recent and historical sampling results, and copies of the laboratory reports for each sample collected and analyzed.

3. LONG-TERM STEWARDSHIP

This section describes how Ameren will manage the Site while the Site is undergoing remediation.

3.1 Restriction of Site Access

Fencing and signage will be maintained at the Site.

General inspections of the Site will be required during quarterly sampling events. ERM will conduct a reconnaissance of the Site to identify insufficiencies in the fencing and missing signage. ERM will notify the Ameren Project Manager (PM) for the Site, whom will either or authorize or arrange the repair and/or replacement of the fencing and/or signage.

Visual observations that are indicative of trespassing will be reported to the Ameren PM whom may, at Ameren's discretion, increase the frequency of visits to the Site for purposes of monitoring of trespass. The Ameren PM may also determine that additional signage or other measures are warranted to restrict the Site from trespassers.

Formal inspections of the entirety of Ameren-owned parcels associated with the Site, including the two parcels adjacent to the Site, which are covered under the EC, and an additional parcel to the southeast, will be conducted on an annual basis. Observations as to the condition of the fencing, downed trees, or other changes in the condition of the properties will be documented and then communicated to Ameren in an annual inspection report. Ameren will address fence repairs, removal of trees, or other services, as determined by Ameren.

3.1.1 Effectiveness of Site Access Restrictions

To date, no indications of trespassing have been observed for the Site. Fencing and signage have been sufficient to prohibit trespassing onto the Site. Repairs and improvements have been made as needed. The effectiveness of the restrictions at the Site will continue to be monitored and, if needed, increased, with notification of the increase given to the IEPA.

3.2 Determination of RAOs

The RAOs established by IEPA in the ROD, and as approved in the 2005 ESD, will continue to be the RAOs utilized for the Site unless there is a change in the IEPA-approved RAOs for the Site.

3.2.1 Effectiveness of RAO Determinations

The RAOs determined by IEPA for the Site have been effective goals to measure containment and remediation of impacts at the Site. The effectiveness of the RAOs to support remediation and containment of the groundwater will continue to be monitored and if changes are needed, these will be discussed with IEPA.

3.3 Institutional Controls

The existing ICs will continue to be utilized for the Site. A summary of the ICs at the Site is presented in the following table:

Institutional Control	Application Areas	IC Objective	Document Details
Environmental Covenant	Site parcel and two downgradient parcels adjacent to the Site	a. No groundwater usage as a potable supply of water; b. No wells installed on the property except for those approved by IEPA; c. Any impacted groundwater removed from the Property shall be handled in accordance with all applicable laws and regulations as required by the ROD and/or Consent Decree; d. In the event subsurface soils are removed, excavated, or disturbed from the impacted, such soils should be evaluated and managed in accordance with all applicable laws and regulations.	Environmental Covenant prepared by Ameren on August 20, 2012; between Ameren and the IEPA (Appendix B)
City-wide GW Use Prohibition	Properties to the north, east, and south of the Site	Prohibits the use of groundwater from within the City limits. No installation of potable wells is allowed, and the ordinance requires new land owners, without connections to the municipal water supply system, to connect to the municipal water supply system.	Ordinance 3463 (adopted May 3, 2010; attached as **Appendix C)** and Taylorville Code of Ordinances; *Title 8 Public Ways and Property; Chapter 4 Water Use and Service; Article B. Use of Groundwater as a Potable Water Supply; Section 8-4B-2 Prohibited; Exception; Connection Required*

3.3.1 Environmental Covenant

As detailed in Section 2.6, there is an EC on the parcel on which the Site is located and is also inclusive of two adjacent parcels to the south of the Site as shown in Figure 4. This covenant prohibits groundwater use as a potable water source and the installation of potable wells at the EC properties. It also set handling requirements for soil and impacted groundwater at the Site and adjacent two parcels to the south of the Site. The EC is included in Appendix B.

3.3.2 City Prohibition Ordinance

A City-wide groundwater use prohibition is in place for the City of Taylorville (Ordinance 3463, adopted May 3, 2010, and attached in Appendix C) and included in Taylorville's Code of Ordinances (*Title 8, Chapter 4, Article B, Section 8-4B-2).*

The City-wide GW Use Prohibition states:

> *ARTICLE B. USE OF GROUNDWATER AS A POTABLE WATER SUPPLY*
>
> *SECTION:*
>
> *8-4B-1: Definitions*
>
> *8-4B-2: Prohibited; Exception; Connection Required*
>
> *8-4B-3: Memorandum Of Understanding*
>
> *8-4B-4: Penalties*
>
> *8-4B-1: DEFINITIONS:*
>
> *PERSON: Any individual, partnership, copartnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, or any other legal entity, or their legal representatives, agents or assigns.*

POTABLE WATER: Any water used for human or domestic consumption, including, but not limited to, water used for drinking, bathing, swimming, washing dishes, or preparing foods. (Ord. 3463, 5-3-2010)

8-4B-2: PROHIBITED; EXCEPTION; CONNECTION REQUIRED:

Except for such uses or methods in existence before the effective date hereof, the use or attempt to use as a potable water supply groundwater from within the corporate limits of the city of Taylorville, as a potable water supply, by the installation of drilling of wells or by any other method is hereby prohibited. This prohibition does not include the city of Taylorville.

Upon information and belief, the city of Taylorville believes that there are only two (2) parcels within the corporate limits of the city of Taylorville which have wells in use for potable water. Those two (2) parcels are located at 1324 West Franklin Street and 1504 West Park Avenue.

If a property is annexed into the city of Taylorville, has a well in use for potable water, and a city of Taylorville water main is accessible, said property owner must tap onto the city's water main within one hundred twenty (120) days of annexation. (A city water main is accessible if it crosses the property in question.)

If a property is annexed into the city of Taylorville, has a well in use for potable water, and a city of Taylorville water main is not accessible, the property owner of said property shall tap onto a city water main within one hundred twenty (120) days of a water main becoming accessible and operational.

If a property currently within the city of Taylorville limits has an existing well in use for potable water, and the house is sold, the new property owner must tap onto a city of Taylorville water main if one is accessible within twenty one (21) days of the closing of the sale. If a city of Taylorville water main is not accessible, the owner of said property must tap onto a city water main within one hundred twenty (120) days of a city water main becoming accessible and operational. (Ord. 3463, 5-3-2010)

8-4B-3: MEMORANDUM OF UNDERSTANDING:

The mayor of the city of Taylorville is hereby authorized and directed to enter into a memorandum of understanding with the Illinois environmental protection agency ("Illinois USEPA") in which the city of Taylorville assumes responsibility for tracking all sites that have received no further remediation determinations from the Illinois USEPA, notifying the Illinois USEPA of changes to this article, and taking certain precautions when siting public potable water supply wells. (Ord. 3463, 5-3-2010)

8-4B-4: PENALTIES:

Any person violating the provisions of this article shall be subject to a fine of up to two hundred fifty dollars ($250.00) for each day for each violation. (Ord. 3463, 5-3-2010)

By agreement with the IEPA, the City of Taylorville is required to notify IEPA of changes to the groundwater prohibition ordinance above.

3.3.3 Effectiveness of Institutional Controls

The ICs in place have been effective to restrict public access to the Site and to restrict public access to the groundwater in the area of the Site for use as a potable water supply.

3.4 P&T Remedial System

The P&T system at the Site continues to be operated year-round to facilitate extraction and treatment of groundwater. Treated groundwater is sampled and analyzed weekly to meet discharge requirements prior to the discharge of treated groundwater.

3.4.1 Operation and Maintenance

Operations and maintenance of the P&T facility will continue to be conducted as follows:

- Filter bag media and personal protective equipment (PPE) will be analyzed, shipped, and disposed of in accordance with solid waste regulations.
- Filter bag media and the effectiveness of the treatment system will be assessed daily, and filter bag media replaced as necessary.
- Spent carbon will be taken from the carbon treatment columns from within the facility and taken offsite by a contractor for regeneration and reuse if practical, or disposal.
- Treated groundwater will be collected and analyzed for compliance with the ROD and applicable regulations. The influent and effluent groundwater, as well as groundwater to be collected from the from a point between the carbon filters, will be sampled and analyzed weekly for the following parameters:
  - BTEX;
  - Dissolved Iron;
  - Total Iron;
  - PAHs; and
  - pH.
- Treated groundwater that is to be discharged will be directed to the drainage swale or to a point below the Seaman Estates Pond dam via underground piping.
- Equipment utilized for repair or maintenance will be kept in working condition and returned to the facility building or other designated storage location after each use. Facility maintenance needs or repairs needed to equipment will be reported to Ameren who will designate a contractor to conduct the needed inspection and/or repair.
- Lawns and drives will be maintained in good condition. Contractors conducting these services will not access, handle, or dispose of groundwater from the Site.

3.4.2 Decontamination and Investigation Derived Waste Management

PPE and spent filter bags have been and will continue to be disposed of in accordance with applicable regulations. Used PPE and spent filter bags are stored in 55-gallon drums that are currently purchased from and delivered by Nelson Oil in Springfield, Illinois. The drums are picked up and disposed of by Peoria Disposal Company (PDC), a division of GFL Environmental, Inc., on a call-as-needed basis.

3.4.3 Inspections

Visual and/or physical inspections related to the P&T facility will continue to be conducted as follows:

- Visual inspections of the wells associated with the P&T facility will be conducted quarterly during groundwater sampling events, as presented in Table 4a. Changes to the conditions of the wells that warrant further action will be reported to Ameren in a timely manner and addressed as designated by Ameren and/or the Contractor Project Manager.

- Visual inspections of the facility will be conducted on a daily schedule by the facility operator or a designated person as presented in Table 4b. Daily inspections will be documented in the log forms for the facility.
- Physical inspection of the backflow preventer on the east side of the facility, where groundwater enters the building, will be conducted annually by a designated plumbing Contractor. Any plumbing repairs that are needed will be reported to the City of Taylorville and Ameren, and only the designated plumbing Contractor for the Site will be utilized to make the repairs. Inspections of the backflow preventer will be documented in facility forms, to be shared with the City of Taylorville and Ameren, and a tag noting the repair will be attached to the backflow preventer.
- Iron will be monitored daily by the facility operator or a designated person in the absence of the facility operator.
- Annual inspections of the fencing around the Site parcel and two adjacent properties, to the south of the Site, will be conducted. During non-inspection periods, observations by Contractors or Ameren staff of a change in condition to fencing, gates, or signage will be reported to the Ameren project manager.

3.4.4 Effectiveness of P&T System

The P&T system has operated for more than 27 years and has been successful in reducing the concentration of COCs in groundwater at the Site. The most significant reductions in Site COCs in groundwater was observed in the first ten years of operation, with lesser amounts of reduction over time. This is as expected for a system that has operated for an extended period of time to remove impacts in the groundwater. The system has also been successful to prevent contaminants from migrating offsite.

Although the system continues to remove residual concentrations of COCs from the groundwater, it is expected that P&T's effectiveness to reduce concentrations to those below RAOs will continue to decrease and the length of time to ultimately attain concentrations below RAOs will be significant (100 years or more). Discussions with IEPA are ongoing to evaluate whether other alternative remedial actions may bring more expedient remediation of the residual concentrations currently observed in the groundwater.

3.5 Groundwater Monitoring

3.5.1 Groundwater Sampling and Reporting

Sampling of groundwater will be conducted each quarter for the analytes presented in Table 1.

3.5.2 Decontamination and Investigation Derived Waste Management

PPE associated with the groundwater monitoring program will continue to be disposed of in accordance with applicable regulations. As discussed in Section 3.4.2, used PPE is stored in 55-gallon drums at the facility and are picked up and disposed of by PDC.

3.5.3 Laboratory Analytical Testing

Laboratory analysis will be performed by an accredited laboratory in compliance with the National Environmental Laboratory Accreditation Program (NELAP). Currently, the offsite laboratory utilized for the sampling at the Site and the P&T facility is Teklab. If there is a change in the offsite lab to conduct the analyses, a similar laboratory will be utilized and the change in laboratory will be reported to the IEPA.

Analytical methods will be performed in accordance with SW-846 requirements. The analytical methods and chemical group for quarterly groundwater sampling are as follows:

- SW-846 3510C,8270C, SVOCs; and
- SW-846 5030, 8260B, VOCs.

The analytical methods and chemical group for P&T system sampling are as follows:

- SW-846 3510C,8270C, SVOCs;
- SW-846 5030, 8260B, VOCs;
- EPA 600, Dissolved Iron;
- EPA 600, Total Iron; and
- SW-846 9040B pH.

All laboratory analytical reports and accompanying Level 3 Data Packages will be provided by Teklab. The Level 3 Data Packages will be used to evaluate analytical data and determine usability, including analytical data results, quality control, and sample handling information.

3.5.4 Quality Assurance/Quality Control

Applicable Quality Assurance/Quality Control (QA/QC) procedures will be performed to provide data quality and compliance with field and laboratory methods and procedures in accordance with the *Quality Assurance Project Plan* (QAPP), *Groundwater Monitoring Program, Ameren CIPS Site, Taylorville, Illinois, dated October 2022* (ERM 2022b). QA/QC procedures include the checking and calibration of field equipment, collection of appropriate QA/QC samples, review of analytical data, and the review of data presented in applicable reports.

Field duplicates, matrix spike/matrix spike duplicates (MS/MSD), equipment blanks, and trip blank samples will be collected and submitted to the laboratory to provide the means to assess the sampling program's data quality. Blind field duplicate samples will be obtained every 10 samples collected. The MS/MSD and equipment blank samples will be obtained every 20 samples collected. A trip blank will be added to each cooler containing VOC samples.

3.5.5 Data Validation Management

The Level 3 Data Packages, provided by Teklab, will be used by ERM to evaluate analytical data and determine usability, including analytical data, quality control, and sample handling information. ERM will review analytical data for compliance with QA/QC and method-prescribed criteria in accordance with the QAPP (ERM 2022b). The review will consist of an USEPA Stage 2A data validation on all laboratory data, and a Stage 3 data validation of 20 percent of the laboratory samples.

The data quality will be assessed and any necessary qualifiers will be applied following *USEPA National Functional Guidelines for Organic/Inorganic Superfund Methods Data Review,* (USEPA 2017*); Environmental Data Review Supplement for Region 1 Data Review Elements and Superfund Specific Guidance/Procedures,* dated June 2018 (USEPA 2018); and the QAPP (ERM 2022b). Results from the data validation process will be used to provide an evaluation of the overall laboratory performance.

3.5.6 Reporting

Each quarter, Ameren, or its contractor, will submit a report to IEPA with information on the most recent groundwater sampling event at the Site. This report will include a brief narrative, a summary table of the results, and copies of the laboratory reports received.

3.5.7 Effectiveness of Groundwater Monitoring

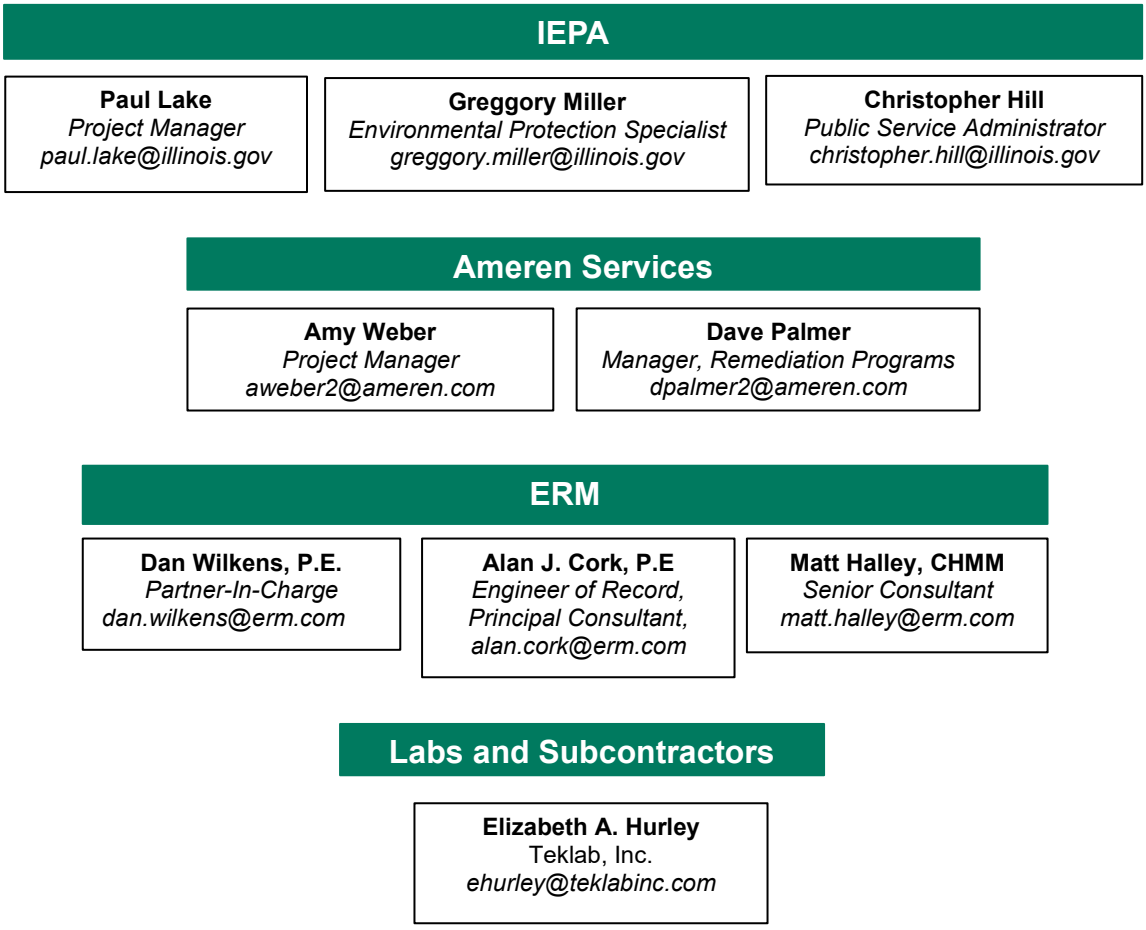
The groundwater monitoring program for the Site has been successful at evaluating the continued reduction of the groundwater plume associated with the former MGP activities at the Site.

4. PROJECT ORGANIZATION

The groundwater monitoring program is managed by Ameren's contractor, ERM, in collaboration with Ameren, IEPA, and the P&T facility operators employed through EMA.

4.1 Project Organizational Chart

The management of this project and primary stakeholders are presented in the organization chart below.



5. COMMUNICATION PLAN

The purpose of this Communication Plan is to provide clear, effective lines of communication between the Ameren, ERM, IEPA and USEPA regarding activities and developments at the Site. Submittal of any notice, demand, request, consent, approval, or communication that either party desires, or is required to give to the other, shall be in writing and addressed. The following individuals are current contacts for the Site:

Ameren CIPS Site - Contact Information

Organization	Contact	Email	Phone Number	Address
IEPA	Paul Lake	paul.lake@illinois.gov	217 785 7728	P.O. Box 19276 Springfield, Illinois 62794-9276
	Greggory Miller	greggory.miller@illinois.gov	217 782 9869	
Ameren	Dave Palmer	dpalmer2@ameren.com	314 621 3222	1901 Chouteau Avenue St. Louis, MO 63166-6149
	Amy Weber	aweber2@ameren.com	314 621 3222	
ERM	Matt Halley	matt.halley@erm.com	314 733 4495	1968 Craig Road, Suite 100 St. Louis, MO 63141
	Dan Wilkens	dan.wilkens@erm.com	314 733 4491	
	Alan Cork	alan.cork@erm.com	314 733 4489	
USEPA	David Linnear	linnear.david@epa.gov	312 886 2014	77 West Jackson Boulevard Chicago, IL 60604

The project contacts and roles for the collection, analyses, and reporting of groundwater monitoring samples are presented in the table below:

Ameren CIPS Site – Roles and Responsibilities

Communication Drivers	Responsible Entity	Name	Phone Number	Procedure (Timing, Pathways, etc.)
Regulatory agency interface	ERM	Dan Wilkens, Partner-in-Charge	314 733 4491	Contact IEPA only after contacting Ameren Services. Documentation required.
Field progress reports	ERM	Matt Halley, Project Manager; Field Lead; Field Staff	Matt Halley 314 733 4495	Contact ERM project manager, project geologist, engineer, or designated project staff by phone at end of each day and as needed to summarize work completed and notify that all tasks were completed safely. Any significant deviance from planned activities should be reported immediately to the ERM project manager and to Ameren Services.
Stop work due to safety issues	ERM	Any team member	Matt Halley 314 733 4495	Notify ERM project manager, project geologist, engineer, or designated project staff immediately to assess, direct and make changes, and notify others. Notify Ameren Services after contacting ERM project manager.

Ameren CIPS Site – Roles and Responsibilities				
Communication Drivers	**Responsible Entity**	**Name**	**Phone Number**	**Procedure (Timing, Pathways, etc.)**
Sample receipt and laboratory QC variances	ERM	Matt Halley, Project Manager	314 733 4495	If the issue could possibly result in the rejection of data, contact the task manager and field manager. Otherwise, note the issues in the laboratory case narrative of the sample delivery group (SDG).
Analytical and Date Review corrective actions	ERM	Matt Halley, Project Manager	Matt Halley 314 733 4495	If the issue could possibly result in the rejection of data, contact the ERM project manager, project geologist, engineer, or designated project staff immediately. Additionally, note the issues in the case narrative if the report is required to be revised, or the data validation report.

6. COST ESTIMATE

This section describes the estimated annual costs to operate, maintain, and monitor the P&T system and conduct the groundwater monitoring program.

6.1 Annual Operating Costs

The P&T system has been operating since 1995 so the annual operational costs can be estimated with confidence. The average annual cost to operate, maintain, and monitor the P&T system and conduct groundwater monitoring at the Site for the last five completed years is shown below:

Ameren CIPS Site – Past Annual Costs (2017-2021) in U.S dollars

Activity / Component	Year	Annual Operational Spend	Maintenance / Repair Spend	Total Annual Spend
P&T System Operation	2021	$223,000	$50,000	$273,000
	2020	$219,000	$29,000	$248,000
	2019	$214,000	$28,000	$242,000
	2018	$210,000	$27,000	$237,000
	2017	$206,000	$26,000	$232,000
GW Sampling, Monitoring Well Repairs, Analyses and Reporting	2021	$83,000	$5,000	$88,000
	2020	$81,000	$4,900	$85,900
	2019	$79,000	$4,800	$83,800
	2018	$78,000	$4,700	$82,700
	2017	$76,000	$4,600	$80,600
Total Annual Costs	2021	$306,000	$55,000	$361,000
	2020	$300,000	$33,900	$333,900
	2019	$293,000	$32,800	$325,800
	2018	$288,000	$31,700	$319,700
	2017	$282,000	$30,600	$312,600
Average Annual Costs (2017-2021)		**$293,800**	**$36,800**	**$330,600**
Average Rate of Increase (2017-2021)		1.70%	15.95%	3.10%

The average cost for the last five years is approximately $330,600 per year. However, these costs do not take inflation into the account for the present-day value of past expenses nor capital expenditures. ERM has estimated an annual cost to conduct the existing program for the next five years to be approximately $1,980,000, as shown in the table below.

Ameren CIPS Site – Future Annual Costs (2022-2026)				
Annual Rate Increase (based on previous 5 years)		**3.10%**	**3.10%**	
Activity / Component	**Year**	**Annual Operational Spend**	**Maintenance / Repair Spend**	**Total Annual Spend**
P&T System Operation	2026	$259,776	$58,246	$318,021
	2025	$251,965	$56,494	$308,459
	2024	$244,389	$54,796	$299,184
	2023	$237,040	$53,148	$290,188
	2022	$229,913	$51,550	$281,463
GW Sampling, Monitoring Well Repairs, Analyses and Reporting	2026	$96,688	$5,825	$102,512
	2025	$93,781	$5,649	$99,430
	2024	$90,961	$5,480	$96,440
	2023	$88,226	$5,315	$93,541
	2022	$85,573	$5,155	$90,728
Total Annual Costs	2026	$356,463	$64,070	$420,533
	2025	$345,745	$62,144	$407,889
	2024	$335,349	$60,275	$395,625
	2023	$325,266	$58,463	$383,729
	2022	$315,486	$56,705	$372,191
Total Five-Year Costs (2022-2026)		**$1,678,310**	**$301,657**	**$1,979,967**
Average Annual Costs (2022-2026)		$335,662	$60,331	$395,993

6.2 Resources

Ameren has and will continue to practice good stewardship of this Site. Remedial activities began at the Site in 1987 and the P&T system has been operating since 1995.Ameren has adequate funding sources to conduct reasonable and timely remediation activities at the Site..

In addition, Ameren has long-term relationships and contracts with remediation contractors and consultants. The primary Contractor for the groundwater monitoring program is ERM, which has significant experience in the remediation of former MGP sites.

7. CONCLUSION

The P&T facility for the Site was installed in 1995 and consists of the extraction of impacted groundwater and treatment via carbon filtration The facility is operated under the oversight of the IEPA.

The groundwater monitoring program for the Ameren CIPs Site began before the installation of the P&T facility in 1995 and has continued for more than 27 years. The program has documented the extent and magnitude of decreasing VOCs and SVOCs in groundwater at and downgradient of the Site.

Ameren has successfully contained and reduced the impacts present in groundwater at the Site. There are no exceedances of VOCs or SVOCs in offsite downgradient wells. Due to the decreasing benefit of P&T technologies to remediate low concentrations of VOCs and SVOCs residually present in groundwater and due to the age of the P&T facility, Ameren is in discussions with IEPA on alternative remedial actions for the Site.

Ameren plans to continue the groundwater monitoring program associated with remediation of the Site, which includes stewardship of the Site, its parent parcel, and the downgradient, Ameren-owned properties, as well as the relationships it has with its neighbors, Manners Park, the City of Taylorville, and the IEPA.

8. REFERENCES

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ERM 2022a: *Year 2022 Quarter 2 Groundwater Sampling Results, Former MGP Site - Taylorville Illinois;* Environmental Resources Management, Inc.; dated June 9, 2022.

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IEPA 2005. *Explanation of Significant Differences, Ameren CIPS National Priorities List Site*; Illinois Environmental Protection Agency; August 2005. https://semspub.epa.gov/src/document/05/255563

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TABLES

Table 1. Groundwater Remedial Action Objectives

Ameren CIPS Site, Taylorville, Illinois

Taylorville FMGP Groundwater Monitoring Analytes	1992 ROD Goals *mg/L*	2005 ESD Goals *mg/L*	Taylorville RAOs *mg/L*	IEPA GW Standards (TACO Table B-A, Class 1) *mg/L*
Acenapthene	0.42		**0.42**	0.42
Anthracene	2.1		**2.1**	2.1
Benzo(a)anthracene	0.00013		**0.00013**	0.00013
Benzo(a)pyrene	0.00023	0.0002	**0.0002**	0.0002
Benzo(b)fluoranthene	0.00018		**0.00018**	0.00018
Benzo(k)fluoranthene	0.00017		**0.00017**	0.00017
Chrysene	0.0015		**0.0015**	0.0015
Dibenzo(a,h)anthracene	0.0003		**0.0003**	0.0003
Fluoranthene	0.28		**0.28**	0.28
Fluorene	0.28		**0.28**	0.28
Indeno(1,2,3-c,d)pyrene	0.00043		**0.00043**	0.00043
Naphthalene	0.025		**0.025**	0.14
Pyrene	0.21		**0.21**	0.21
Benzene	0.005		**0.005**	0.005
Toluene	1		**1**	1
Ethylbenzene	0.7		**0.7**	0.7
Total Xylenes	10		**10**	10
trans-1,2-dichloroethylene	0.1		**0.1**	0.1
2-Methylphenol (o-cresol)	0.35		**0.35**	0.35
4-Methylphenol (p-Cresol)	0.35		**0.35**	-
Dichloromethane	0.0002		**0.0002**	0.005
Bromoform	0.0002		**0.0002**	0.001
Di-n-butylphthalate	0.7		**0.7**	0.7
Bis(2-ethylhexyl)phthalate	0.0027		**0.0027**	0.006
Acenapthylene	0.21		**0.21**	0.21
Benzo(g,h,i)perylene	0.21		**0.21**	-
Phenanthrene	0.21		**0.21**	-
Sum of 2-methylphenol and 4-methylphenol	0.5		**0.5**	-
Mixture 1: Acenapthene+ fluoranthene+fluorene+pyrene	1		**1**	-
Mixture 2: dichloromethane+bis(2-ethylhexyl)phthalate	1		**1**	-

Key:
ESD - Explanation of Significant Differences
FMGP - Former Manufactured Gas Plant
GW - Groundwater
IEPA - Illinois Environmental Protection Agency
ROD - Record of decision

Table 2. P&T System Discharge Sampling Analytes

Ameren CIPS Site, Taylorville, Illinois

Taylorville FMGP P&T Facility Discharge Analytes	1992 ROD Goals *mg/L*	2005 ESD Goals *mg/L*	Taylorville RAOs *mg/L*
Acenapthene	0.42		0.42
Acenapthylene			
Anthracene	2.1		2.1
Benzo(a)anthracene	0.00013		0.00013
Benzo(a)pyrene	0.00023	0.0002	0.0002
Benzo(b)fluoranthene	0.00018		0.00018
Benzo(g,h,i)perylene			
Benzo(k)fluoranthene	0.00017		0.00017
Chrysene	0.0015		0.0015
Dibenzo(a,h)anthracene	0.0003		0.0003
Fluoranthene	0.28		0.28
Fluorene	0.28		0.28
Indeno(1,2,3-c,d)pyrene	0.00043		0.00043
2-Methylphenol (o-cresol)	0.35		0.35
4-Methylphenol (p-Cresol)	0.35		0.35
Phenanthrene	0.21		0.21
Naphthalene	0.025		0.025
Pyrene	0.21		0.21
Benzene	0.005		0.005
Toluene	1		1
Ethylbenzene	0.7		0.7
m,p-Xylenes	0.35		0.35
o-Xylene	0.35		0.35
Total Xylenes	10		10

Key:

ESD - Explanation of Significant Differences

FMGP - Former Manufactured Gas Plant

Table 3. Sampling Schedule

Ameren CIPS Site, Taylorville, Illinois

Location	Analytes	Frequency
P&T Facility		
Influent	pH, Iron	Daily
	VOCs, SVOCs *(see Table 4b)*	Weekly
Mid-Process	pH, Iron	Daily
	VOCs, SVOCs *(see Table 4b)*	Weekly
Effluent	pH, Iron	Daily
	VOCs, SVOCs *(see Table 4b)*	Weekly
GW Monitoring Program		
GW-01	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-02	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-03	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-04R	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-05	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-07	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-09S	VOCs, SVOCs *(see Table 4ab)*	Annually
GW-09D	VOCs, SVOCs *(see Table 4ab)*	Annually
GW-11	VOCs, SVOCs *(see Table 4ab)*	Well Destroyed
GW-12	VOCs, SVOCs *(see Table 4ab)*	Annually
GW-13S	VOCs, SVOCs *(see Table 4ab)*	Annually
GW-13D	VOCs, SVOCs *(see Table 4ab)*	Annually
GW-14	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-15	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-16S	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-16D	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-17	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-18S	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-18D	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-19S	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-19D	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-20	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-21	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-22S	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-22D	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-25	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-26	VOCs, SVOCs *(see Table 4ab)*	Quarterly
GW-101S	VOCs, SVOCs *(see Table 4ab)*	Annually
GW-102S	VOCs, SVOCs *(see Table 4ab)*	Annually
GW-102D	VOCs, SVOCs *(see Table 4ab)*	Annually
GW-103S	VOCs, SVOCs *(see Table 4ab)*	Annually
GW-103D	VOCs, SVOCs *(see Table 4ab)*	Annually

Key:
VOCs - volatile organic compounds
SVOCs - semi-volatile organic compounds
GW - Groundwater

Table 4a. Inspection Schedule - Wells

Ameren CIPS Site, Taylorville, Illinois

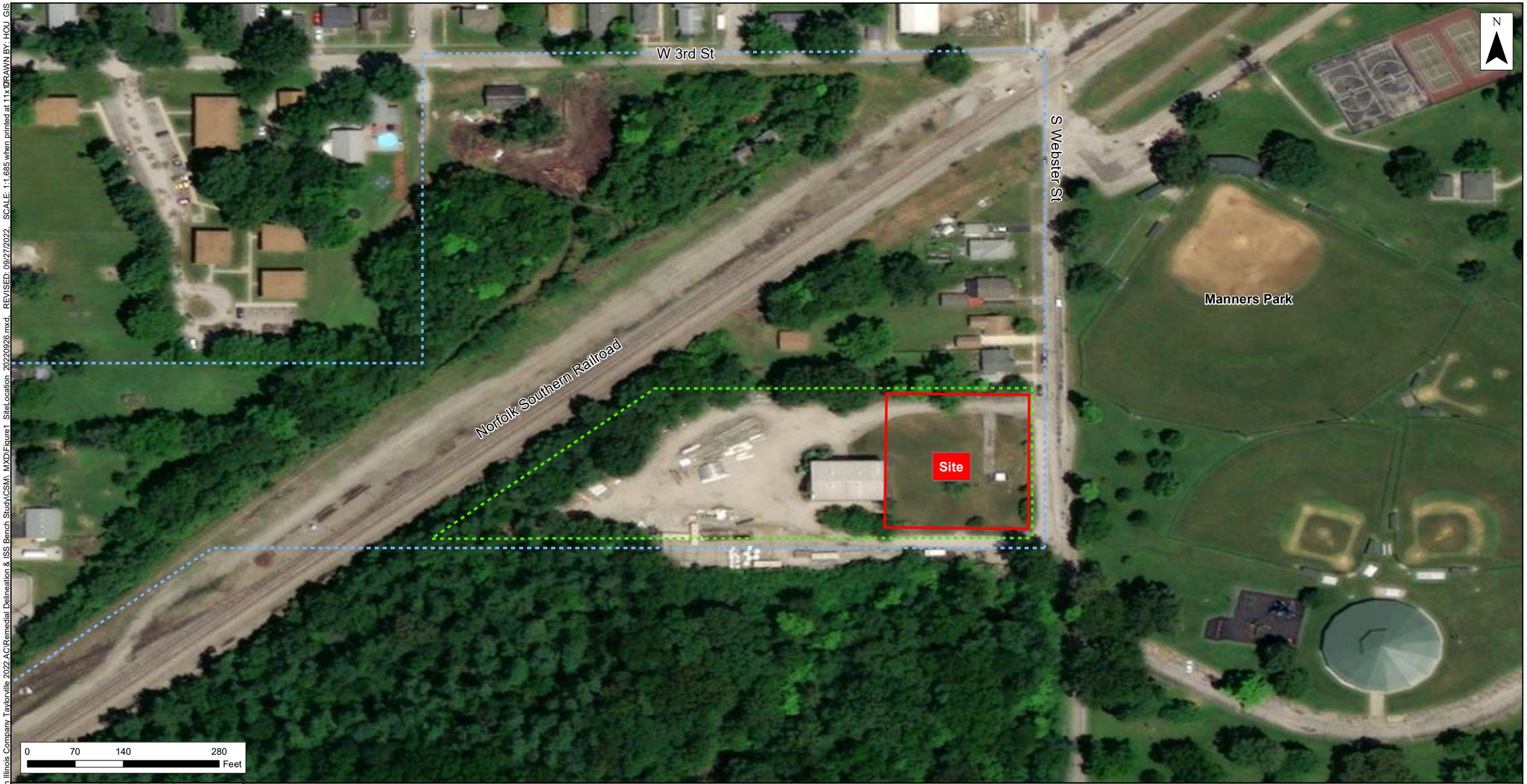
Well	Frequency	Screen Interval (ft bgs)	Note Condition				
			Well Head/Well Protector	Well Casing	Bladder Pump	Tubing	Screen Access
Extraction Wells							
EW-1	Weekly	15-90	X	X			X
EW-2	Weekly	15-90	X	X			X
Onsite Monitoring Wells							
GW-02	Quarterly	15 - 25	X	X	X	X	X
GW-03	Quarterly	13 - 23	X	X	X	X	X
GW-04R	Quarterly	16 - 26	X	X	X	X	X
GW-07	Quarterly	80 - 90	X	X	X	X	X
GW-14	Quarterly	84 - 94	X	X	X	X	X
GW-15	Quarterly	80 - 90	X	X	X	X	X
GW-22S	Quarterly	25 - 35	X	X	X	X	X
GW-22D	Quarterly	79 - 89	X	X	X	X	X
Parent Parcel Monitoring Wells							
GW-01	Quarterly	17.5 - 27.5	X	X			X
Other Offsite Monitoring Wells							
GW-05	Quarterly	50.75 - 61	X	X	X	X	X
GW-09S	Annually	23 - 33	X	X	X	X	X
GW-09D	Annually	72 - 82	X	X	X	X	X
GW-11	-	26.25 - 36.5	*Well destroyed by IDOT in 2017*				
GW-12	Annually	14.25 - 19.25	X	X			X
GW-13S	Annually	40.5 - 50.5	X	X	X	X	X
GW-13D	Annually	83 - 93	X	X	X	X	X
GW-16S	Quarterly	25 - 35	X	X	X	X	X
GW-16D	Quarterly	81 - 91	X	X	X	X	X
GW-17	Quarterly	25 - 35	X	X	X	X	X
GW-18S	Quarterly	15 - 25	X	X	X	X	X
GW-18D	Quarterly	74 - 84	X	X	X	X	X
GW-19S	Quarterly	12 - 22	X	X	X	X	X
GW-19D	Quarterly	72.5 - 82.5	X	X	X	X	X
GW-20	Quarterly	4.5 - 9.5	X	X			X
GW-21	Quarterly	22.5 - 32.5	X	X			X
GW-25	Quarterly	18 - 28	X	X	X	X	X
GW-26	Quarterly	26 - 36	X	X	X	X	X
GW-101S	Annually	19.38 - 24.37	X	X	X	X	X
GW-102S	Annually	23 - 28	X	X	X	X	X
GW-102D	Annually	53 - 58	X	X	X	X	X
GW-103S	Annually	13.56 - 18.55	X	X	X	X	X
GW-103D	Annually	74.88 - 79.86	X	X	X	X	X

Table 4b. Visual Inspection Schedule - Equipment

Ameren CIPS Site, Taylorville, Illinois

Equipment	Frequency	Parameters
Fencing		
All accessible fencing	Annually	Documentation of post condition, Wire/metal condition, Tree interference, Intentional damage, Indications of trespassing
Perimeter road fencing	Quarterly	Post condition, Wire/metal condition, Tree interference, Intentional damage
Site parcel fencing	Weekly	Immediate documentation and reporting to Ameren of observed damage and/or Indications of trespassing
Pumping Equipment		
Backflow Preventor	Annually	Condition, valve and line pressure (psi)
West Pump	Weekly	Condition, Fluid/oil leaks, Signs of wear
East Pump	Weekly	Condition, Fluid/oil leaks, Signs of wear
Wells GW-O1, GW-02, GW-03, GW-04R, GW-05, GW-07, GW-14, GW-15,GW-16S, GW-16D, GW-17, GW-18S, GW-18D, GW-19S, GW-19D, GW-20, GW-21, GW-22S, GW-22D, GW-25, GW-26	Quarterly	Condition, Fluid leaks, Signs of wear
Wells GW-09, GW-09D, GW-12, GW-13S, GW-13D, GW-101S, GW-1-2S, GW-102D, GW-103S, GW-103D	Annually	Condition, Fluid leaks, Signs of wear
Treatment Equipment		
Filter Bag Unit #1	Daily	Breakthrough, damage, discoloration
Filter Bag Unit #2	Daily	Breakthrough, damage, discoloration
Filter Bag Unit #3	Daily	Breakthrough, damage, discoloration
Spent Bag Drums	Daily	Secure lids, damage, correct location, proper signage, proper documentation
Sampling bottles	Daily	Breakage, sufficient qauntity, seals intact
Monitoring Equipment		
Battery Pack SN BP-456 (IL0003)	Quarterly	Condition, designated location
Air Compressor	Quarterly	Condition, designated location
Pneumatic Hose on Reel (80 ft)	Quarterly	Condition, designated location
Pneumatic Hose (6 ft)	Quarterly	Condition, designated location
Control Box #1 - Black	Quarterly	Condition, labelling
Control Box #2 - Gray (IL0005)	Quarterly	Condition, labelling
Equipment Box (IL0016)	Quarterly	Condition, labelling
O&M Manual	Quarterly	Condition, designated location
Combustible Gas Indicator	Weekly	Condition, designated location, calibration information
Oxygen Meter	Weekly	Condition, designated location, calibration information
Photoionization Detector	Weekly	Condition, designated location, calibration information
Safety Equipment		
Emergency Contact List	Weekly	Current information, designated location
Emergency Lighting	Monthly	30-second test, no obstructions
Emergency Signage	Weekly	Condition, no obstructions
Exit Signage	Weekly	Condition, no obstructions
Fire Alarm System	Monthly	Working condition, no obstructions
Fire Alarm System	Annually	Certification, testing
Fire Extinguishers	Monthly	Condition, designated locations, inspection tags, pin intact, tamper seal unbroken
First Aid Kit	Monthly	Condition, designated location, sufficient quantities
Hand-washing sink	Weekly	Working condition, signage, supplies
MSDS Posting	Weekly	Condition, designated location
Personal Protective Equipment	Weekly	Condition, designated location, sufficient quantities
System Alarms	Monthly	Test system for working condition

FIGURES



Legend

- City Boundary
- Parent Parcel Boundary
- Remediation Site Boundary

Notes:

Figure 1
Site Location and Surrounding Land Use
Taylorville FMGP Site
Taylorville Township
Christian County, IL

Source: Esri - World Topoographic Map; GCS NAD 1983 2011

Environmental Resources Management
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ERM

Legend

- Groundwater Well
- Parent Parcel Boundary
- Site Boundary

Notes:

Figure 2
Onsite Groundwater Wells
Taylorville FMGP Site
Taylorville Township
Christian County, IL

Environmental Resources Management
www.erm.com
ERM

Source: Esri - World Topoographic Map; GCS NAD 1983 2011

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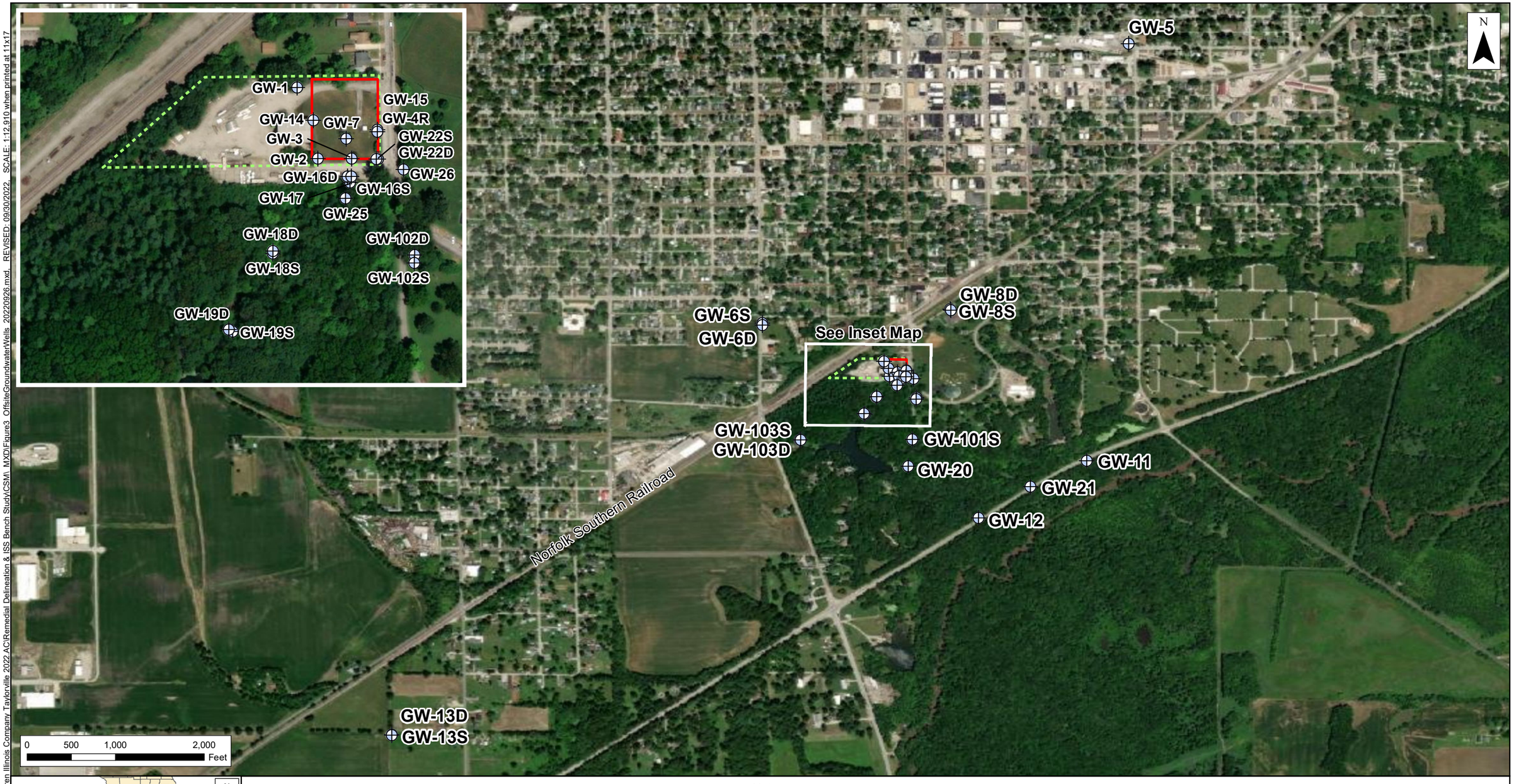


Legend

- Groundwater Well
- Parent Parcel Boundary
- Remediation Site Boundary

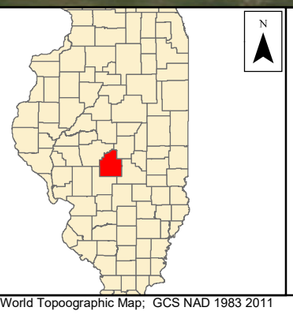
Notes:

Figure 3
Offsite Groundwater Wells
Taylorville FMGP Site
Taylorville Township
Christian County, IL

Environmental Resources Management
www.erm.com

Source: Esri - World Topoographic Map; GCS NAD 1983 2011 DRAWN BY: SJG

\\usbdcfs02\data\SL Louis\Projects\0638675 Ameren Illinois Company Taylorville 2022 ACI\Remedial Delineation & ISS Bench Study\CSM\ MXD\Figure3 OffsiteGroundwaterWells 20220926.mxd, REVISED: 09/30/2022, SCALE: 1:12,910 when printed at 11x17



Legend

- Surface Water and Shallow Groundwater Flow Direction (direction varies)
- Groundwater Flow Direction (to south/southwest)
- Parent Parcel Boundary
- Adjacent Downgradient Parcel
- Boundary Included In Environmental Covenant
- Remediation Site Boundary

Environmental Covenant (August 20, 2012)

-No Groundwater Usage

-No Groundwater Wells

-Handling of Contaminated Groundwater – Must be in accordance with ROD, Consent Decree and all applicable laws and regulations

-Handling of Soil – In the event subsurface soils are removed, excavated, or disturbed from the impacted area, such soils should be evaluated and managed in accordance with all applicable laws and regulations

Figure 4
Environmental Covenant Areas
Taylorville FMGP Site
Taylorville Township
Christian County, IL

Environmental Resources Management
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ERM

Source: Esri - World Topoographic Map; GCS NAD 1983 2011

APPENDIX A PHOTOLOG – FENCING / ACCESS RESTRICTIONS

Photograph 1	North gate to Site with fencing and signage

Photograph 2	Fencing and gate to parcel south of the Site.

Photograph 3	Fencing and signage on gate between Site parcel and adjacent parcel south of the Site.

Photograph 4	Fencing and signage on parcel south of the Site.

Photograph 5	Fencing and signage on parcel south of the Site.

Photograph 6	Fencing and signage on parcel south of the Site.

APPENDIX B ENVIRONMENTAL COVENANT

2012R04842 20
2012R04842
LINDA CURTIN
CHRISTIAN COUNTY RECORDER
TAYLORVILLE, IL
RECORDED ON
08/30/2012 09:06AM
PAGES: 20 DK
REC FEE: 28.00
AUTO FEE: 18.00
GIS FEE: 20.00
RHSP FEE: 9.00
RHSP CO FEE: 0.50
RHSP REC FEE: 0.50

This instrument was prepared by:

Ameren Services Company
1901 Chouteau Avenue (MC 700)
St. Louis, Missouri 63103

Please return this instrument to:

Kim Geving, Assistant Counsel
Illinois EPA
1021 N. Grand Ave. East
P.O. Box 19276
Springfield, Illinois 62794-9276

ENVIRONMENTAL COVENANT

1. Environmental Covenant:

This Environmental Covenant is made this 20 day of August, 2012 by Ameren Illinois Company, doing business as Ameren Illinois, an Illinois corporation ("AIC") corporate successor to Central Illinois Public Service Company ("Grantor") and the Holders/Grantees further identified in paragraph 3 below pursuant to the Uniform Environmental Covenants Act, 765 ILCS Ch. 122 ("UECA"), for the purpose of subjecting the Property to the activity and use limitations described herein.

2. Property and Grantor:

A. Property: The real property subject to this Environmental Covenant is located at 917 South Webster Street, Taylorville, Illinois in Christian County, more particularly described on Appendix A, which is attached hereto and made part hereof ("the Property"). The county parcel number of this Property is 17-13-27-331-006-00.

B. Grantor: The Grantor is the current fee owner of the property, AIC is the "Grantor" of this Environmental Covenant. The mailing address of the Grantor is 300 Liberty Street, Peoria, Illinois 61602.

3. Holders (and Grantees for purposes of indexing):

A. The Illinois Environmental Protection Agency ("Illinois EPA") is a Holder (and Grantee for purposes of indexing) of this Environmental Covenant pursuant to its authority under Section 3(b) of UECA. The mailing address of the Illinois EPA is 1021 N. Grand Avenue East, P.O. Box 19276, Springfield, IL 62794-9276.

B. AIC, its successors and assigns, is a Holder of this Environmental Covenant pursuant to UECA. The mailing address of AIC is 300 Liberty Street, Peoria, Illinois. Regardless of any future transfer of the Property, AIC shall remain a Holder of this Environmental Covenant. AIC is to be identified as both Grantee and Grantor for purposes of indexing.

4. Agencies:

The Illinois EPA and the U.S. Environmental Protection Agency ("U.S. EPA") are "Agencies" within the meaning of Section 2(2) of UECA. The Agencies have approved the environmental response project described in paragraph 5 below and may enforce this Environmental Covenant pursuant to Section 11 of UECA.

5. Environmental Response Project and Administrative Record:

A. This Environmental Covenant arises under an environmental response project as defined in Section 2(5) of UECA.

B. The Property is part of the Central Illinois Public Service Company Site ("the Site"), which the U.S. EPA, pursuant to Section 105 of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9605, listed on the National Priorities List ("NPL"), set forth at 40 C.F.R. Part 300, Appendix B, in 1990 (see 55 Fed. Reg. 35502 (August 30, 1990)).

C. Investigations indicated the presence of polyaromatic hydrocarbons ("PAHs"), including benzo(a)pyrene, anthracene, and phenanthrene, as well as benzene and toluene, in soils and groundwater at the site. Various remedial actions have been performed. Ingestion and inhalation pathways were addressed with soil removal in 1987. Recovery wells were installed on the site in 1995 to contain contaminated groundwater along with a carbon treatment system to treat recovered groundwater. The groundwater recovery and treatment system along with environmental monitoring are performed pursuant to the terms and conditions of the Record of Decision ("ROD") and Consent Decree. A Memorandum of Judgment was recorded May 13, 1994 as Doc. No. 1994R3089 in the case of People of the State of Illinois v. Central Illinois Public Services Company, Case No. 93-3332.

D. In a ROD dated September 30, 1992, the Illinois EPA, in consultation with U.S. EPA, selected a plan for remediation of the site that included removing certain soils and sediments, treating groundwater, and imposing institutional controls. Those remedial actions and objectives were embodied in a Consent Decree executed by Illinois EPA, U.S. EPA, and Central Illinois Public Service Company in December 1993. Illinois EPA has been designated as the lead enforcement agency for the Site. The remedial action plan requires implementation and compliance with land and groundwater activity and use limitations at the site in order to prevent unacceptable exposures from any hazardous substances remaining at the Site.

E. AIC, in compliance with requirements set forth in the ROD and Consent Decree, is placing groundwater usage restrictions on the site ("the Property") utilizing restrictive covenants that will apply to the Property, identified by Illinois EPA Bureau of Land under Identification Number 0218160007.

F. Grantor wishes to cooperate fully with the Agencies in the implementation, operation, and maintenance of all response actions at the site.

G. The Administrative Record for the environmental response project at the Site (including the Property) is maintained at the Taylorville Public Library, 121 W. Vine Street, Taylorville, Illinois 62568. Persons may also contact FOIA Officer, 1021 N. Grand Avenue East, P.O. Box 19276, Springfield, IL 62794-9276 for the Administrative Record or other information concerning the site.

6. **Grant of Covenant. Covenant Runs With the Land:**

Grantor creates this Environmental Covenant pursuant to UECA so that the Activity and Use Limitations and associated terms and conditions set forth herein shall "run with the land" in accordance with Section 5(a) of UECA and shall be binding on Grantor, its heirs, successors and assigns, and on all present and subsequent owners, occupants, lessees or other person acquiring an interest in the Property.

7. **Activity and Use Limitations:**

The following Activity and Use Limitations apply to the Property:

A. **No Groundwater Usage** – The groundwater under the Property shall not be used as a potable supply of water;

B. **No Groundwater Wells** -- There shall be no wells installed on the property except for those approved by Illinois EPA;

C. **Handling of Contaminated Groundwater** -- Any contaminated groundwater removed from the Property shall be handled in accordance with all applicable laws and regulations and as required by the ROD and/or Consent Decree;

D. **Handling of Soils** – As part of the remediation efforts, approximately the top ten feet of soil from the environmentally impacted area has been removed and replaced with clean cover. In the event subsurface soils are removed, excavated, or disturbed from the impacted area depicted in Appendix B, such soils should be evaluated and managed in accordance with all applicable laws and regulations.

8. **Right of Access:**

Grantor consents to officers, employees, contractors, and authorized representatives of the Holders, Illinois EPA and U.S. EPA entering and having continued access at reasonable times to the Property for the following purposes:

A. Monitoring or implementing response actions in any CERCLA decision document affecting the Property or any associated work plans;

B. Verifying any data or information submitted to Illinois EPA and U.S.EPA;

C. Verifying that no action is being taken on the Property in violation of the ROD, the Consent Decree or this instrument or any federal or state environmental laws or regulations;

D. Monitoring response actions on the Property and conducting investigations relating to contamination on or near the Property, including, without limitation, sampling of air, water, sediments, soils, and obtaining split or duplicate samples;

E. Conducting periodic reviews of the remedial action, including but not limited to, reviews required by applicable statutes and/or regulations and by CERCLA;

F. Implementing additional or new response actions if the Illinois EPA, with the concurrence of U.S.EPA, pursuant to authority under applicable law, determines that such actions are necessary.

9. No Limitation of Rights or Authorities:

Nothing in this document shall limit or otherwise affect Illinois EPA's or the U.S. EPA's rights of entry and access or authority to take response actions under CERCLA, the National Contingency Plan ("NCP"), or other federal or state law.

10. Reserved Rights of Grantor:

Grantor hereby reserves unto itself, its successors, and assigns, including heirs, lessees and occupants, all rights and privileges in and to the use of the Property which are not incompatible with the activity and use limitations identified herein.

11. No Public Access and Use:

No right of access or use by the general public to any portion of the Property is intended or conveyed by this instrument.

12. Future Conveyances, Notice and Reservation:

A. Grantor agrees to include in any future instrument conveying any interest in any portion of the Property, including but not limited to deeds, leases, and mortgages, a notice and reservation which is in substantially the following form:

The interest conveyed hereby is subject to and Grantor specifically reserves the environmental covenant executed under the Uniform Environmental Covenants Act ("UECA") at 765 ILCS 122 recorded in the official property records of Christian County, Illinois on _____ as document no _____, in favor of and enforceable by grantor as a UECA holder, the Illinois Environmental Protection Agency as a UECA holder and the U.S. Environmental Protection Agency as a UECA agency.

B. Grantor agrees to provide written notice to Illinois EPA and U.S. EPA within 30 days after any conveyance of fee title to the Property or any portion of the Property. The notice shall identify the name and contact information of the new owner to the fee interest, and the portion of the Property conveyed to that owner of the fee interest.

13. <u>Enforcement and Compliance</u>:

A. Civil Action for Injunction and Equitable Relief: This Environmental Covenant may be enforced through a civil action for injunctive or other equitable relief for any violation of any term or condition of this Environmental Covenant, including violation of the Activity and Use Limitations under Paragraph 7 and denial of Right of Access under Paragraph 8. Such an action may be brought individually or jointly by:

i. the Illinois Environmental Protection Agency;
ii. the Holders of the Environmental Covenant; and
iii. the U.S. Environmental Protection Agency.

B. Other Authorities Not Affected: No Waiver of Enforcement - All remedies available hereunder shall be in addition to any and all other remedies at law or in equity, including CERCLA. Nothing in this Environmental Covenant affects U.S. EPA or Illinois EPA's authority to take or require performance of response actions to address releases or threatened releases of hazardous substances or pollutants or contaminants at or from the Property, or to enforce a consent order, consent decree or other settlement agreement entered into by U.S. EPA or Illinois EPA. Enforcement of the terms of this instrument shall be at the discretion of the Holders, the U.S. EPA and Illinois EPA and any forbearance, delay or omission to exercise its rights under this instrument in the event of a breach of any term of this instrument shall not be deemed to be a waiver by the Holders, U.S. EPA or Illinois EPA of such term or of any subsequent breach of the same or any other term, or of any of the rights of the Holders, U.S.EPA or Illinois EPA of such term or of any subsequent breach of the same or any other term, or of any of the rights of the Holders, U.S. EPA, or Illinois EPA.

C. Former Owners and Interest Holders Subject to Enforcement: An owner of the fee interest, or other person that holds any right, title or interest in or to the Property remains subject to enforcement with respect to any violation of this Environmental Covenant by the owner of the fee interest or other person which occurred during the time when the

owner of the fee interest or other person was bound by this Environmental Covenant regardless of whether the owner of the fee interest or other person has subsequently conveyed the fee title, or other right, title or interest, to another person.

14. Waiver of Certain Defenses:

This Environmental Covenant may not be extinguished, limited, or impaired through issuance of a tax deed, foreclosure of a tax lien, or application of the doctrine of adverse possession, prescription, abandonment, waiver, lack of enforcement, or acquiescence, or similar doctrine as set forth in Section 9 of UECA.

15. Representations and Warranties:

Grantor hereby represents and warrants to the Illinois EPA, U.S. EPA and any other signatories to this Environmental Covenant that, at the time of execution of this Environmental Covenant, that the Grantor is lawfully seized in fee simple of the Property, that the Grantor has a good and lawful right and power to sell and convey it or any interest therein, that the Property is free and clear of encumbrances, except those noted in Appendix C attached hereto, and that the Grantor will forever warrant and defend the title thereto and the quiet possession thereof. After recording this instrument, Grantor will provide a copy of this Environmental Covenant to all holders of record of the encumbrances including those entities noted on Appendix C.

16. Amendment or Termination:

Except the Illinois EPA and U.S. EPA, all Holders and other signers waive the right to consent to an amendment or termination of the Environmental Covenant. This Environmental Covenant may be amended or terminated by consent only if the amendment or termination is signed by the Illinois EPA, U.S. EPA and the current owner of the fee simple of the Property, unless waived by the Agencies. If Grantor no longer owns the Property at the time of proposed amendment or termination, Grantor waives the right to consent to an amendment or termination of the Environmental Covenant. Grantor reserves the right to modify in whole or in part the restrictions set forth in subparagraphs 7 (a)-(d), upon approval of Illinois EPA and U.S.EPA.

17. Notices:

Any notice, demand, request, consent, approval, or communication that either party desires or is required to give to the other shall be in writing and shall either be served personally or sent by first class mail, postage prepaid, addressed as follows:

To Grantor:

ATTN: Manager of Real Estate Department
Ameren Services Company as authorized Agent for
Ameren Illinois Company

1901 Chouteau Avenue (MC 700)
St. Louis, Missouri 63166-6149

To Holder:

Ameren Illinois Company
ATTN: Manager of Real Estate Department
%Ameren Services Company
1901 Chouteau Avenue (MC 700)
St. Louis, Missouri 63166-6149

To U.S. EPA:

U.S. Environmental Protection Agency
Superfund Division Director
77 West Jackson Boulevard
Chicago, IL 60604

To Illinois EPA:

Illinois Environmental Protection Agency
Chief, Bureau of Land
1021 N. Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

18. Recording and Notice of Environmental Covenant, Amendments and Termination:

A. **The Original Environmental Covenant**: An Environmental Covenant must be recorded in the Office of the Recorder or Registrar of Titles of the county in which the property that is the subject of the Environmental Covenant is located. Within 30 days after the Illinois EPA and U.S. EPA (whichever is later) sign and deliver to Grantor this Environmental Covenant, the Grantor shall record this Environmental Covenant in the office of the County Recorder or Registrar of Titles for the County in which the Property is located.

B. **Termination, Amendment or Modification**: Within 30 days after Illinois EPA and U.S. EPA (whichever is later) sign and deliver to owner of the fee interest any termination, amendment or modification of this Environmental Covenant, the owner of the fee interest shall record the amendment, modification, or notice of termination of this Environmental Covenant in the office of the County Recorder or Registrar of Titles in which the Property is located.

C. **Providing Notice of Covenant, Termination, Amendment or Modification**: Within 30 days after recording this Environmental Covenant, the Grantor shall transmit a copy of the Environmental Covenant in recorded form to:

i. Illinois EPA;
ii. U.S. EPA;
iii. each person holding a recorded interest in the Property, including those interest in Appendix C;
iv. each person in possession of the Property, and
v. each political subdivision in which the Property is located.

Within 30 days after recording a termination, amendment or modification of this Environmental Covenant, the owner of the fee interest shall transmit a copy of the document in recorded form to the persons listed in items i to v above.

19. General Provisions:

A. Controlling law: The interpretation and performance of this instrument shall be governed by the laws of the State of Illinois and the United States of America.

B. Liberal Construction: Any general rule of construction to the contrary notwithstanding, this instrument shall be liberally construed in favor of the Grantor to effect the purpose of this instrument and the policy and purpose of the environmental response project and its authorizing legislation, and CERCLA. If any provision of this instrument is found to be ambiguous, an interpretation consistent with the purpose of this instrument that would render the provision valid shall be favored over any interpretation that would render it invalid.

C. No Forfeiture: Nothing contained herein will result in a forfeiture or reversion of AIC's title in any respect.

D. Joint Obligation: If there are two or more parties identified as Grantor herein, the obligations imposed by this instrument upon them shall be joint and several.

E. Captions: The captions in this instrument have been inserted solely for convenience of reference and are not a part of this instrument and shall have no effect upon construction or interpretation.

20. Effective Date:

This Environmental Covenant is effective on the date of acknowledgement of the signature of the Illinois EPA and U.S. EPA, whichever is later.

Appendices:

Appendix A Legal Description of the Property

Appendix B Diagram of Impacted Soil Area

Appendix C List of Recorded Encumbrances

THE UNDERSIGNED REPRESENTATIVE OF THE GRANTOR REPRESENTS AND CERTIFIES THAT HE/SHE IS AUTHORIZED TO EXECUTE THIS ENVIRONMENTAL COVENANT.

IN WITNESS WHEREOF, THIS INSTRUMENT HAS BEEN EXECUTED ON THE DATES INDICATED BELOW:

FOR THE GRANTOR:

Executed this 9th day of July, 2012.

Ameren Illinois Company, d/b/a Ameren Illinois,
an Illinois Corporation

By: _____
Dennis W. Weisenborn
Its: Vice-President

STATE OF MISSOURI)
) SS
CITY OF ST. LOUIS)

On this 9th day of July 2012, before me, the undersigned, a Notary Public in and for the State of Missouri , duly commissioned and sworn, personally appeared Dennis W. Weisenborn, known to be a Vice-President of Ameren Illinois Company, d/b/a Ameren Illinois, the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that they are authorized to execute said instrument.

Witness my hand and official seal hereto affixed the day and year written above.

_____
Notary Public in and for the
State of Missouri
My Commission Expires: _____.

Nannette H. Morton - Notary Public
Notary Seal, State of
Missouri - St. Louis County
Commission #10431488
My Commission Expires 7/10/2014

FOR THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: _____

Title: Interim Director

Illinois Environmental Protection Agency

State of Illinois)
)SS.
County of Sangamon)

This instrument was acknowledged before me on July 16, **2012, by** John Kim, ~~a delegate of~~ **the Director of the Illinois Environmental Protection Agency, a state agency, on behalf of the State of Illinois.**

Cynthia L. Wolfe
Notary Public
My Commission Expires (date)
11-17-2015

OFFICIAL SEAL
CYNTHIA L. WOLFE
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 11-17-2015

FOR THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

On behalf of the Administrator of the
United States Environmental Protection Agency

By: Richard C Karl
Richard C. Karl, Director
Superfund Division
U.S. Environmental Protection Agency, Region 5

STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

The foregoing instrument was acknowledged before me this 20th day of AUGUST, 2012, by Richard C. Karl, Director, Superfund Division, Region 5 of the United States Environmental Protection Agency.

BERTANNA M. LOUIE
OFFICIAL SEAL
Notary Public, State of Illinois
My Commission Expires
March 15, 2014

Notary Public
My Commission Expires
3/15/2014

APPENDIX A

LEGAL DESCRIPTION OF THE PROPERTY

ALL THAT PART OF THE NORTH HALF (N.1/2.) OF THE SOUTH EAST QUARTER (S.E. ¼.) OF THE SOUTH WEST QUARTER (S.W.1/4.) OF SECTION TWENTY SEVEN (SEC. 27.), IN TOWNSHIP THIRTEEN NORTH (T.13.N.), RANGE TWO WEST (R.2.W) OF THE THIRD PRINCIPAL MERIDIAN (3RD. P. M.), CHRISTIAN COUNTY, ILLINOIS, WHICH IS DESCRIBED AS FOLLOWS: FROM THE INTERSECTION OF THE WEST LINE OF WEBSTER STREET (EXTENDED SOUTHWARDLY) IN THE CITY OF TAYLORVILLE, WITH THE NORTH LINE OF THE PUBLIC HIGHWAY WHICH EXTENDS EAST AND WEST ALONG THE SOUTH LINE OF THE ABOVE DESCRIBED HALF QUARTER QUARTER SECTION (THE SAID POINT OF INTERSECTION BEING TWENTY FIVE FEET (25') NORTH AND TWENTY THREE AND NINE TENTHS FEET (23.9') WEST OF THE SOUTH EAST CORNER (S. E. COR.) OF THE SAID HALF QUARTER QUARTER SECTION), AS THE PLACE OF BEGINNING, MEASURE WESTWARDLY, SIX HUNDRED SEVENTEEN AND SEVEN TENTHS FEET (617.7'), ALONG THE NORTH LINE OF THE SAID PUBLIC HIGHWAY, TO THE SOUTHEASTERLY LINE OF THE RIGHT OF WAY OF THE WABASH RAILROAD COMPANY; THENCE DEFLECTING ONE HUNDRED FORTY DEGREES AND TWENTY EIGHT MINUTES (140°28') TO THE RIGHT, MEASURE NORTHEASTWARDLY, THREE HUNDRED THIRTY FIVE AND TWO TENTHS FEET (335.2'), ALONG THE SAID RIGHT OF WAY LINE; THENCE DEFLECTING THIRTY NINE DEGREES AND THIRTY TWO MINUTES (39°32') TO THE RIGHT, MEASURE EASTWARDLY, THREE HUNDRED FORTY NINE AND FOUR TENTHS FEET (349.4'), ALONG A LINE WHICH IS PARALLEL WITH THE SOUTH LINE OF THE SAID HALF QUARTER QUARTER SECTION, TO THE SAID SOUTHERLY EXTENSION OF WEBSTER STREET; THENCE MEASURE SOUTHWARDLY, TWO HUNDRED FIFTEEN FEET (215'), ALONG THE SAID EXTENDED WEST LINE OF WEBSTER STREET, TO THE PLACE OF BEGINNING.
CONTAINING AN AREA OF ONE HUNDRED THREE THOUSAND NINE HUNDRED SIXTY THREE SQUARE FEET (103,963 S. F.), OR 2.3867 ACRES.

FOR:
AMEREN ILLINOIS COMPANY DBA/ AMEREN ILLINOIS
FORMERLY KNOWN AS CENTRAL ILLINOIS PUBLIC SERVICE COMPANY
1915 OLD BUS LINE ROAD
P.O. BOX 579
HILLSBORO , ILLINOIS 62049

MEC
MARTIN ENGINEERING COMPANY of Illinois
CONSULTING ENGINEERS/LAND SURVEYORS
(ILLINOIS PROFESSIONAL DESIGN FIRM NO. 184-004556)
3223 S. MEADOWBROOK RD., SPRINGFIELD, ILLINOIS 62711
Phone : (217) 698-8900, Fax : (217) 698-8922, E-Mail : mecmail@martinengineeringco.com

PLAT OF SURVEY

Part of the Southeast Quarter of the Southwest Quarter of Section 27, and part of the Northeast Quarter of the Northwest Quarter of Section 34, all in Township 13 North, Range 2 West of the Third Principal Meridian, Taylorville, Christian County, Illinois, more particularly described as follows.

Beginning at the Northeast corner of the Northeast Quarter of the Northwest Quarter of said Section 34, thence South 02 degrees 45 minutes 22 seconds East, on the East line of said Northwest Quarter, a distance of 330.91 feet; thence South 88 degrees 32 minutes 43 seconds West, a distance of 360.00 feet; thence North 02 degrees 45 minutes 22 seconds West, a distance of 331.51 feet to a point on the South line of the Southeast Quarter of the Southwest Quarter of said Section 27; thence North 00 degrees 00 minutes 00 seconds East, a distance of 22.35 feet; thence South 88 degrees 38 minutes 24 seconds West, a distance of 827.31 feet to a point on the East right of way line of South Shumway Street (aka – Nokomis Road); thence North 18 degrees 11 minutes 20 seconds West, on said East right of way line, a distance of 207.00 feet to a point on the Southeasterly right of way of the Norfolk Southern Railroad; thence North 48 degrees 43 minutes 50 seconds East, on said Southeasterly right of way line, a distance of 689.41 feet to a point on the North line of the South Half of the Southeast Quarter of the Southwest Quarter of said Section 27 ; thence North 88 degrees 57 minutes 00 seconds East, on said North line, a distance of 66.07 feet; thence North 49 degrees 06 minutes 56 seconds East, on said Southeasterly right of way line, a distance of 374.67 feet; thence North 88 degrees 57 minutes 00 seconds East, a distance of 353.60 feet to a point on the West right of way line of Webster Street; thence South 01 degrees 37 minutes 36 seconds East, on said West right of way line, a distance of 215.01 feet; thence North 88 degrees 57 minutes 00 seconds East, a distance of 23.90 feet; thence South 01 degrees 20 minutes 00 seconds East, a distance of 25.00 feet; thence South 00 degrees 00 minutes 00 seconds West, a distance of 659.00 feet to the point of beginning, containing 21.28 acres, more or less.

Subject to recorded Easements and right of ways of record, if any.

G: \jobs\11223\V-PLAT.dwg, LEGAL

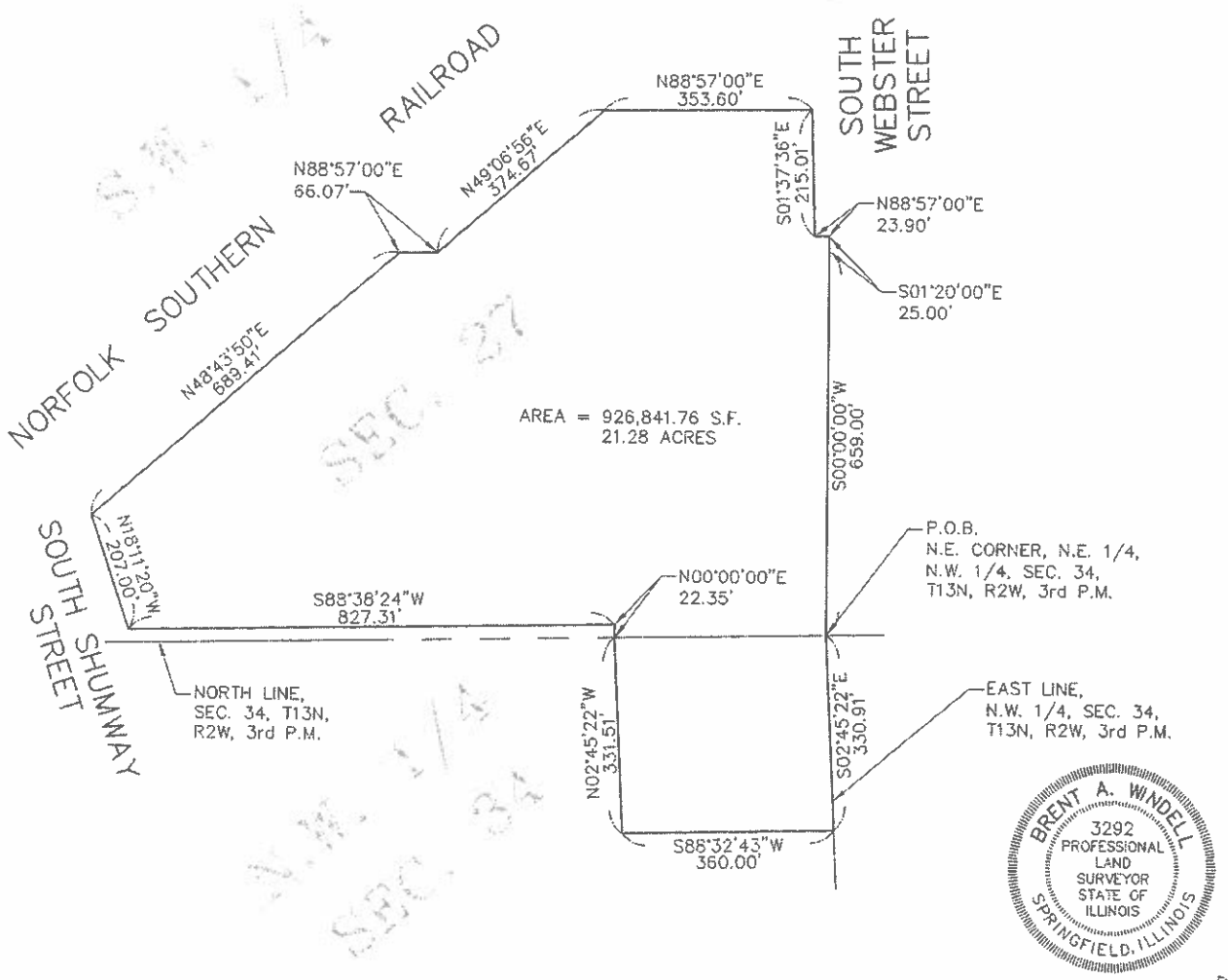
FOR: AMEREN ILLINOIS COMPANY DBA/ AMEREN ILLINOIS
FORMERLY KNOWN AS CENTRAL ILLINOIS PUBLIC SERVICE COMPANY
1915 OLD BUS LINE ROAD
P.O. BOX 579
HILLSBORO , ILLINOIS 62049

TAYLORVILLE TOWNSHIP
CHRISTIAN COUNTY, IL

PLAT OF SURVEY

(SEE SHEET 2 OF 2 SHEETS FOR LEGAL DESCRIPTION)

MEC
MARTIN ENGINEERING COMPANY of Illinois
CONSULTING ENGINEERS/LAND SURVEYORS
(ILLINOIS PROFESSIONAL DESIGN FIRM NO. 184-004556)
3223 S. MEADOWBROOK RD., SPRINGFIELD, ILLINOIS 62711
Phone: (217) 698-8900, Fax: (217) 698-8922, E-Mail: mecmail@martinengineeringco.com



200' 100' 0 200'

SCALE : 1" = 200'

DATE: JANUARY 23, 2012

AREA = 926,841.76 S.F.
21.28 ACRES

LEGEND

— — — — — SECTION LINE

FIELD WORK COMPLETED JANUARY, 2012.

BASIS OF BEARING S02°45'22"E ON THE EAST LINE OF THE N.W. 1/4, SEC. 34, T13N, R2W, 3rd P.M. (ASSUMED)

NO PART OF THIS PLAT IS LOCATED WITHIN A SPECIAL FLOOD HAZARD AREA AS IDENTIFIED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY, PER MAP NUMBER 17021C0275D, (EFFECTIVE DATE: JUNE 16, 2011).

"THIS PROFESSIONAL SERVICE CONFORMS TO THE CURRENT ILLINOIS MINIMUM STANDARDS FOR A BOUNDARY SURVEY."

SURVEYOR HAS MADE NO INVESTIGATION OR INDEPENDENT SEARCH FOR EASEMENTS OF RECORD, ENCUMBRANCES, RESTRICTIVE COVENANTS, OWNERSHIP, TITLE EVIDENCE, OR ANY OTHER FACTS WHICH AN ACCURATE AND CURRENT TITLE SEARCH MAY DISCLOSE.

I HEREBY CERTIFY THAT, IN THE MONTH OF JANUARY, 2012, I MADE A SURVEY OF THE ABOVE DESCRIBED PROPERTY AND THE FOREGOING PLAT REPRESENTS THE RESULTS OF SAID SURVEY.

BRENT A. WINDELL 3292 PROFESSIONAL LAND SURVEYOR STATE OF ILLINOIS SPRINGFIELD, ILLINOIS

ILLINOIS PROFESSIONAL LAND SURVEYOR NO. 3292

DATE SIGNED : 1-26-2012

LICENSE EXP. DATE : NOV. 30, 2012

REVISED 1/26/2012 SHEET 1 OF 2 SHEETS

G:\jobs\11223\V-PLAT.dwg, PLAT

APPENDIX B

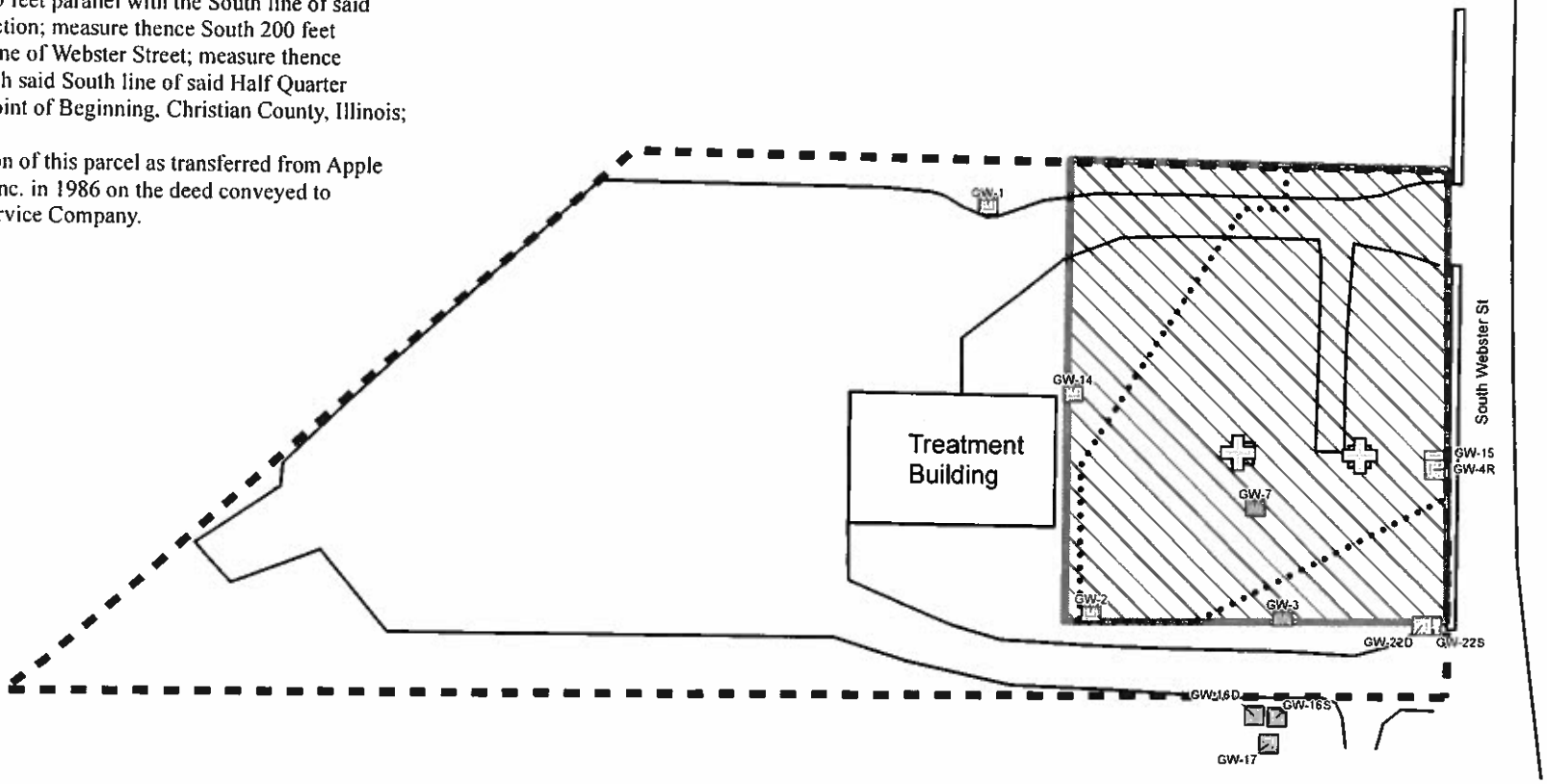
(PLACEHOLDER FOR SITE DIAGRAM AND DELINEATION OF IMPACTED SOIL AREAS)

SOIL RESTRICTION LEGAL DESCRIPTION
(Parcel ID No. 17-13-27-331-005-00):

A part of the North Half of the Southeast Quarter of the Southwest Quarter of Section 27, Township 13 North, Range 2 West of the Third Principal Meridian, more particularly described as follows:

Commencing at a point 40 feet North of and 23.9 feet West of the Southeast corner of said Half Quarter Quarter Section; measure thence North 200 feet along the Westerly line of Webster Street; measure thence West 165 feet parallel with the South line of said Half Quarter Quarter Section; measure thence South 200 feet parallel with said West line of Webster Street; measure thence East 165 feet parallel with said South line of said Half Quarter Quarter Section to the Point of Beginning. Christian County, Illinois;

Reference: The description of this parcel as transferred from Apple Contractors & Erectors, Inc. in 1986 on the deed conveyed to Central Illinois Public Service Company.



Extraction Well

Monitoring Well

Approximate 1987 Excavation Extent (10 ft Average Depth)

Former MGP Boundary and Soil Restrictions (Christian Co. Parcel ID No. 17-13-27-331-005-00)

Property Boundary and Groundwater Restrictions

N

Feet

80 0 80

APPENDIX B
Former CIPS MGP Site
Taylorville, Illinois

APPENDIX C

OWNERS FORM
CHICAGO TITLE INSURANCE COMPANY
SCHEDULE B

Policy No.: 75306-85474773

SPURLING TITLE, INC. 118 WEST MARKET STREET TAYLORVILLE, IL 62568
PHONE: 217-824-3899 FAX: 217-824-3898

EXCEPTIONS FROM COVERAGE

This policy does not insure against loss or damage (and the Company will not pay costs, attorneys' fees or expenses) which arise by reason of:

General Exceptions:

1. Rights or claims of parties in possession not shown by the public records.
2. Encroachments, overlaps, boundary line disputes, or other matters which would be disclosed by an accurate survey and inspection of the premises.
3. Easements, or claims of easements, not shown by the public records.
4. Any lien, or right to a lien, for services, labor, or material heretofore or hereafter furnished, imposed by law and not shown by the public records.
5. Taxes or special assessments which are not shown as existing liens by the public records.

Special Exceptions: The mortgage, if any, referred to in Item 4 of Schedule A.

1. **Taxes for the years 2010 and 2011, not yet due or collectable.**

   Taxes for the year 2009 appear paid.

   17-13-27-331-005-00

   17-13-27-331-006-00

   17-13-27-300-001-00

   17-13-27-300-002-00

   17-13-27-300-003-00

Countersigned

Authorized Signatory

OWNERS FORM
CHICAGO TITLE INSURANCE COMPANY
SCHEDULE B (continued)

Policy No.: 75306-85474773

17-13-34-100-010-00

2. Rights of the public and the municipality in and to as much of the premises in question as may be used, taken or dedicated for Webster Street, (and the southerly extension thereof) and rights of public and quasi public utiltities in and to such portions.

3. Rights of way for drainage ditches, feeders, laterals, and underground tiles, if any.

4. Rights of adjoining and contiguous owners to have maintained the uninterrupted flow of any stream across the premises.

5. Judgment rendered in the United States District Court of the Central District of Illinois, Case Number 93-3332, in favor of the People of the State of Illinois against Central Illinois Public Service Company; a memorandum of which was recorded on May 13, 1994 as Doc. No. 1994R3089.

6. Indentures and supplements thereto relating to security interests in the land, including, but not limted to The Bank of New York Mellon Trust Company, N.A., including, but not limited to Supplemental Indenture recorded May 27, 2011 as Doc. No. 2011R02349.

7. Easement granted by instrument dated January 4, 1974, and recorded January 16, 1974, as Doc. No. 74-11140, made by Vida Seaman Baxter and the Taylorville Sanitary District, an Illinois municipal corporation, to construct, maintain, operate, remove and replace a permanent sewage forcemain and necessary appurtenances, over, under, across and through that part of the SE1/4 of the SE 1/4 of Secion 27, T. 13 N. R. 2 W. of 3rd P.M. lying east and adjacent to the railroad right of way; said line to be 10 feet in width with right of ingress and egress.

8. Covenants and restrictions contained in Warranty Deed dated April 1, 1987 and recorded April 1, 1987 as Doc. No. 87-20224, made by Robert W. Craggs and Sharly Craggs, husband and wife, to Central Illinois Public Service Company, relating to the use for residential purposes only, construction and living space, and no mobile homes or similar units placed on the described premises for a term of 40 years from date of deed.

9. Easement granted by instrument daed August 20, 1984, and recorded August 22, 1984, as Doc. No. 84-4460, made by Robert W. Craggs and Sharly A. Craggs, husband and wife, with Vida Seamen Baxter and Victor Baxter, wife and husband, a right of ingress and egress over an dacross 30 feet as to part of the S1/2 of the SE1/4 of the SW 1/4 of Section 27, T. 13 N. R. 2 W. of 3rd P

10. Covenants and restrictions contained in Warranty Deed dated October 25, 1984, and recorded on October 25, 1984, as Doc. No. 84-5501, made by Robert W. Craggs and Sharyl A. Craggs, husband and wife, to Timothy J. Szabo, pertaining to the use of premises for residential purposes only, ground floor area for structures to be erected, no mobile homes or moveable type residential units for a term of 40 years from date to the execution of deed.

11. Easement recorded October 26, 1987 as Doc. No. 87-23942, made by Timothy J.Szabo and

Policy No.: 75306-85474773

Trina Szabo to Central Illinois Public Service Company for installing, maintaining, removing and replacting a water transmission and distribution pipeline facility and necessary appurtenances.

12. Annexation Ordinance No. 2907 of the City of Taylorville, recorded as Doc. No. 1999R02735.

See Doc. No. 87-22972 for copy of City Ordinance No. 2255 of the City of Taylorville, being an Ordinance Authorizing Execution of Annexation Agreement.

13. Agreement dated August 21, 1987 and recorded October 27, 1987 as Doc. No. 87-24021, made by and among Central Illinois Public Service Company and Timothy Szabo, et al, (being surrounding land owners) regarding water line and appurtenant equipment for connection to municipal water service.

(See Doc. No. 87-22971 (being also Plat Book 5 Page 469) for map of proposed water main).

14. Grant of Easement recorded July 6, 1989 as Doc. No. 89-9181, made by Central Illinois Public Service Company to the City of Taylorville, for a water transmission and distribution facility.

15. Assignment of Easements and Dedication of Water Distribution Facilities recorded July 6, 1989 as Doc. No. 89-9180, made by Central Illinois Public Service Company to the City of Taylorville, for a water transmission and distribution facility.

16. Rights of public and quasi-public utilities in and to such portions, including, but not limited to the rights of the Taylorville Sanitary District in and to an unrecorded (or possibley unwritten) easement for a sewer force main, according to actual notice thereof provided by the Taylorville Sanitary District.

APPENDIX C TAYLORVILLE GROUNDWATER ORDINANCE

CITY OF TAYLORVILLE

ORDINANCE NO. 3463

AN ORDINANCE PROHIBITING THE USE OF GROUND WATER AS A POTABLE WATER SUPPLY BY THE INSTALLATION OR USE OF POTABLE WATER SUPPLY WELLS OR BY ANY OTHER METHOD

ADOPTED BY THE
CITY COUNCIL
OF THE
CITY OF TAYLORVILLE
THIS 3rd DAY OF MAY, 2010.

PUBLISHED IN PAMPHLET FORM BY AUTHORITY
OF THE CITY COUNCIL OF THE CITY OF TAYLORVILLE,
CHRISTIAN COUNTY, ILLINOIS
THIS 4th DAY OF MAY, 2010.

CITY OF TAYLORVILLE

ORDINANCE NO. 3463

AN ORDINANCE PROHIBITING THE USE OF GROUND WATER AS A POTABLE WATER SUPPLY BY THE INSTALLATION OR USE OF POTABLE WATER SUPPLY WELLS OR BY ANY OTHER METHOD

WHEREAS, certain properties in the City of Taylorville, Illinois have been used over a period of time for commercial/industrial purposes; and

WHEREAS, because of said use, concentrations of certain chemical constituents in the ground water beneath the City may exceed Class I groundwater quality standards for potable resource groundwater as set forth in 35 Illinois Administrative Code 620 or Tier 1 remediation objectives as set forth in 35 Illinois Administrative Code 742; and

WHEREAS, the City of Taylorville desires to limit potential threats to human health from groundwater contamination while facilitating the redevelopment and productive use of properties that are the source of said chemical constituents;

NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF TAYLORVILLE, ILLINOIS:

Section One. Use of Groundwater as a potable water supply prohibited.

Except for such uses or methods in existence before the effective date of this ordinance, the use or attempt to use as a potable water supply groundwater from within the corporate limits of the City of Taylorville, as a potable water supply, by the installation of drilling of wells or by any other method is hereby prohibited. This prohibition does not include the City of Taylorville.

Upon information and belief, the City of Taylorville believes that there are only two parcels within the corporate limits of the City of Taylorville which have wells in use for potable water. Those two parcels are located at 1324 West Franklin Street and 1504 West Park Avenue.

If a property is annexed into the City of Taylorville, has a well in use for potable water, and a City of Taylorville water main is accessible, said property owner must tap onto the City's water main within 120 days of annexation. (A City water main is accessible if it crosses the property in question).

If a property is annexed into the City of Taylorville, has a well in use for potable water, and a City of Taylorville water main is not accessible, the property owner of said property shall tap onto a City water main within 120 days of a water main becoming accessible and operational.

If a property currently within the City of Taylorville limits has an existing well in use for potable water, and the house is sold, the new property owner must tap onto a City of Taylorville water main if one is accessible within 21 days of the closing of the sale. If a City of Taylorville water main is not accessible, the owner of said property must tap onto a City water main within 120 days of a City water main becoming accessible and operational.

Section Two. Penalties.

Any person violating the provisions of this ordinance shall be subject to fine of up to $250.00 for each day for each violation.

Section Three. Definitions.

"Person" is any individual, partnership, co-partnership, firm, company, limited liability company, corporation , association, joint stock company, trust, estate, political subdivision, or any other legal entity, or their legal representatives, agents or assigns.

"Potable water" is any water used for human or domestic consumption, including, but not limited to, water used for drinking, bathing, swimming, washing dishes, or preparing foods.

Section Four. Memorandum of Understanding.

The Mayor of the City of Taylorville is hereby authorized and directed to enter into a Memorandum of Understanding with the Illinois Environmental Protection Agency ("Illinois EPA") in which the City of Taylorville assumes responsibility for tracking all sites that have received no further remediation determinations from the Illinois EPA, notifying the Illinois EPA of changes to this ordinance, and taking certain precautions when siting public potable water supply wells.

Section Five. Repealer.

All ordinances or parts of ordinances in conflict with this ordinance are hereby repealed insofar as they are in conflict with this ordinance.

Section Six. Severability.

If any provision of this ordinance or its application to any person or under any circumstances is adjudged invalid, such adjudication shall not affect the validity of the ordinance as a whole or of any portion not adjudged invalid.

Section Seven. Effective date.

This ordinance shall be in full force and effect from and after its passage, approval and publication as required by law.

Greg Brotherton

GREG BROTHERTON,
Mayor of the City of Taylorville

ATTEST:

(Municipal Seal)

Pamela J. Peabody

PAMELA J. PEABODY, City Clerk

AYES: Aldermen Burtle, Dorchinecz, Hafliger, Heberling, Lawrence, Vota, and Walters

NAYS: None

ABSENT: Alderman Jones

FILED IN THE OFFICE OF THE CITY CLERK, CITY OF TAYLORVILLE, ON THE 4th DAY OF MAY, 2010.

PUBLISHED IN PAMPHLET FORM ON MAY 4, 2010.

CERTIFICATE

STATE OF ILLINOIS)
) **SS.**
COUNTY OF CHRISTIAN)

I, PAMELA J. PEABODY, certify that I am the duly elected and acting City Clerk of the City of Taylorville, Christian County, Illinois.

I further certify that on May 3, 2010, the City Council of said City passed and approved Ordinance No. 3462 entitled **"AN ORDINANCE PROHIBITING THE USE OF GROUND WATER AS A POTABLE WATER SUPPLY BY THE INSTALLATION OR USE OF POTABLE WATER SUPPLY WELLS OR BY ANY OTHER METHOD".**

The pamphlet form of Ordinance No. 3462, including the Ordinance and cover sheet thereof was prepared, and a copy of such Ordinance was posted in the City Hall, commencing on May 4, 2010, and continuing for at least ten days thereafter. Copies of such Ordinance were also available for public inspection upon request in the Office of the City Clerk.

DATED at Taylorville, Illinois, this 4th day of May, 2010.

Pamela J. Peabody
PAMELA J. PEABODY, City Clerk

(MUNICIPAL SEAL)

MEMORANDUM OF UNDERSTANDING

BETWEEN TAYLORVILLE AND THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY REGARDING THE USE OF A LOCAL GROUNDWATER OR WATER WELL ORDINANCE AS AN ENVIRONMENTAL INSTITUTIONAL CONTROL

I. PURPOSE AND INTENT

A. This Memorandum of Understanding ("MOU") between Taylorville and Illinois Environmental Protection Agency("Illinois EPA") is entered into for the purpose of satisfying the requirements of 35 Ill. Adm. Code 742.1015 for the use of groundwater or water well ordinances as environmental institutional controls. The Illinois EPA has reviewed the groundwater or water well ordinance of Taylorville (Attachment A) and determined that the ordinance prohibits the use of groundwater for potable purposes and/or the installation and use of new potable water supply wells by private entities but does not expressly prohibit those activities by the unit of local government itself. In such cases, 35 Ill. Adm. Code 742.1015(a) provides that the unit of local government may enter into an MOU with the Illinois EPA to allow the use of the ordinance as an institutional control.

B. The intent of this Memorandum Of Understanding is to specify the responsibilities that must be assumed by the unit of local government to satisfy the requirements to MOUs as set forth at 35 Ill. Adm. Code 742.1015(i).

II. DECLARATIONS AND ASSUMPTION OF RESPONSIBILITY

In order to ensure the long-term integrity of the groundwater or water well ordinance as an environmental institutional control and that risk to human health and the environment from contamination left in place in reliance on the groundwater or water well ordinance is effectively managed, Taylorville hereby assumes the following responsibilities pursuant to 35 Ill. Adm. Code 742.1015(d)(2) and (i):

A. Taylorville will notify the Illinois EPA Bureau of Land of any proposed ordinance changes or requests for variance at least 30 days prior to the date the local government is scheduled to take action on the proposed change or request (35 Ill. Adm. Code 742.1015(i)(4));

B. Taylorville will maintain a registry of all sites within its corporate limits that have received "No Further Remediation" determinations in reliance on the ordinance from the Illinois EPA (35 Ill. Adm. Code 742.1015(i)(5));

C. Taylorville will review the registry of sites established under paragraph II. B. prior to siting public potable water supply wells within the area covered by the ordinance (35 Ill. Adm. Code 742.1015(i)(6)(A));

D. Taylorville will determine whether the potential source of potable water has been or may be affected by contamination left in place at the sites tracked and reviewed under paragraphs II. B. C. (35 Ill. Adm. Code 742.1015(i)(6)(B)); and

E. Taylorville will take action as necessary to ensure that the potential source of potable water is protected from contamination or treated before it is used as a potable water supply (35 Ill. Adm. Code 742.1015(i)(6)c).

NOTE: Notification under paragraph II. A. above or other communications concerning this MOU should be directed to:

Manager, Division of Remediation Management
Bureau of Land
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, IL 62794-9276

III. SUPPORTING DOCUMENTATION

The following documentation is required by 35 Ill. Adm. Code 742.1015(i)(3)); and is attached to this MOU:

A. Attachment A: A copy of the groundwater or water well ordinance certified by the city clerk or other official as the current, controlling law (35 Ill. Adm. Code 742.1015(i)(2));

B. Attachment B: Identification of the legal boundaries within which the ordinance is applicable (certification by city clerk or other official that the ordinance is applicable everywhere within the corporate limits, if ordinance is not applicable throughout the entire city or village, legal description and map of area showing sufficient detail to determine where ordinance is applicable) (35 Ill. Adm. code 742.1015 (i)(2));

C. Attachment C: A statement of the authority of the unit of local government to enter into the MOU (council resolution, code of ordinances, inherent powers of mayor or other official signing MOU—attach copies) (35 Ill. Adm. Code 742.1015(i)(1)).

IN WITNESS WHEREOF, the lawful representatives of the parties have caused this MOU to be signed as follows:

FOR: City of Taylorville
(Name of City or Village)

BY: Greg Brotherton - Mayor
(Name and title of signatory)

DATE: May 4, 2010

FOR: Illinois Environmental Protection Agency

BY: _____
Manager, Division of Remediation
Management Bureau of Land

DATE: _____

ERM has over 160 offices across the following countries and territories worldwide

Argentina
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