



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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ISPA DIVISION OF RECORDS MANAGEMENT
RELEASABLE

SEP 16 2015

REVIEWER: JKS

August 28, 2015

Claudia Macholz
Nicor Gas
1844 Ferry Road
Naperville, Illinois 60563

Re: 0990555005/LaSalle County
Mendota/Black Brothers Company
Site Remediation/Technical Reports

Dear Ms. Macholz:

The Illinois Environmental Protection Agency (Illinois EPA) has completed a review of the April 2015 *Offsite Summary Report* and May 2013 *Supplemental Site Investigation Sampling Data* which was received on July 22, 2015 (Log No. 15-59991). The subject documents were submitted by Burns & McDonnell Engineering Company, Inc. on behalf of Nicor Gas.

The subject documents are disapproved with the following comments:

1. Page ES-1 partially defines manufactured gas plant (MGP)-related materials as impacts with one or more contaminants of concern (COCs) exceeding Tier 1 industrial/commercial and construction worker objectives. Tables 2 and 3 are developed accordingly; shaded values exceed these objectives (lowest value). However, MGP-related materials also include COCs that exceed the Tier 1, Class I soil migration to groundwater exposure route objectives.
2. The groundwater ingestion exposure route and groundwater to surface water exposure route have not been addressed; these exposure routes cannot be excluded from further consideration. As a result, groundwater and surface water sampling should be performed.
3. Page 2-2 provides a brief discussion regarding samples analyzed for total petroleum hydrocarbon (TPH). Please provide further information including the amount of samples analyzed for TPH, sampling intervals, and the rationale for sample locations selected as compared to field observations, etc.

4. Similarly, Page 2-3 provides a brief discussion regarding samples analyzed for "TCLP" metals, "SPLP" metals, etc. Please provide further information including the amount of samples analyzed for each, sampling intervals, and the rationale for sample locations selected.

5. Section 3.0 should have presented information regarding groundwater classification (the groundwater ingestion exposure route cannot be excluded from further consideration). Groundwater is most appropriately categorized as a Class I resource.

6. Page 3-3: Please clarify if TPH sampling was performed along the creek bank where tar staining and coating was noted.

7. Section 3.3.1 states, in part, that based on the visual observations and analytical results, the horizontal and vertical extent of MGP-related impacts have been defined. Section 3.3.2 provides a similar statement. However, a detailed narrative discussion regarding the horizontal and vertical extent of impact should be provided to support these conclusions; more information is needed.

8. COCs exceed objectives at some of the deepest sampling intervals at certain locations (refer to Tables 2 and 3). Some of the COC concentrations are significantly above Tier 1 objectives. It is understood that excavation is planned. However, confirmation sampling should be performed to confirm that the impacts have been removed.

9. Indications of impact were observed below the water table at numerous locations, although many intervals below the water table with indications of impact (e.g. SP71, SP71D, SP72, SP73, SP84, SP85), were not sampled. As a result, the extent impact has not been defined and soil and groundwater exposures routes have not been adequately evaluated. In addition, analytical results from intervals below the water table indicate that the soil migration to groundwater exposure route is a potential a concern at numerous locations. As a result, additional investigation should be performed.

10. Surface water sampling should also be performed to determine if MGP-related impacts have adversely affected the adjacent creek.

11. Section 3.3.2 states that visually identified MGP-related materials were noted in *several* locations and that tar coating and tar staining was identified in *several* locations. Please identify the locations and intervals and provide further information regarding the findings and extent of impact.

12. Section 4.2 states that soil samples will be collected. Please identify what the samples will be analyzed for.

13. Section 4.5 states that excavation boundaries were determined by removing all locations with *MGP-related impacts* and extending to a location with no MGP-related impacts. As stated above, "MGP-related" impacts should also include COCs that exceed the Tier 1, Class I soil migration to groundwater exposure route objectives. Regardless, more information is needed in regards to the horizontal and vertical extent of impact. Finally, the soil migration to groundwater and groundwater ingestion exposure routes should be evaluated, along with surface water.

14. Please provide a detailed response to this letter before moving forward.

All future submittals to the Site Remediation Program should include one original and one copy of each document and a DRM-2 form.

If you have questions, please contact me at (217) 785-8724 or by e-mail at Jeff.Guy@illinois.gov.

Sincerely,



Jeffrey J. Guy, Project Manager
Voluntary Site Remediation Unit
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