BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

DERSCH ENERGIES, INC., Petitioner,	)	
v.	)	PCB 2017-003
	)	(LUST Permit Appeal)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, Respondent.	)	

NOTICE OF FILING AND PROOF OF SERVICE

TO: Carol Webb, Hearing Officer
Illinois Pollution Control Board
1021 N. Grand Avenue East
P.O. Box 19274
Springfield, IL 62794-9274
(carol.webb@illinois.gov)

Melanie Jarvis
Division of Legal Counsel
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276
(melanie.jarvis@illinois.gov)

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Illinois Pollution Control Board, Petitioner's Post-Hearing Brief, copies of which are herewith served upon the above persons.

The undersigned hereby certifies that a true and correct copy of this Notice of Filing, together with a copy of the documents described above, were today served upon the Hearing Officer and Division of Legal Counsel by electronic-mail, this 8th day of October, 2021. The number of pages of this filing, other than exhibits, is 38.

DERSCH ENERGIES, INC.,

BY: LAW OFFICE OF PATRICK D. SHAW

BY: /s/ Patrick D. Shaw

Patrick D. Shaw
Law Office of Patrick D. Shaw
80 Bellerive Road
Springfield, IL 62704
217-299-8484

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PETITIONER'S POST-HEARING BRIEF

NOW COMES Petitioner, DERSCH ENERGIES, INC. (hereinafer "Dersch"), by its undersigned counsel, for its post-hearing brief pursuant to Section 101.610(k) of the Pollution Control Board's Procedural Rules (35 Ill. Adm. Code § 101.610(k)), states as follows:

STATEMENT OF FACTS

For its statement of facts, Petitioner hereby incorporates by reference the Factual Background summarized by the Pollution Control Board (hereinafter "the Board") in its Opinion and Order denying summary judgment. (Opinion and Order, slip op. at pp. 7-11 (June 17, 2021)) The Board's Factual Background summarizes all of the events up to the determination of the Illinois Environmental Protection Agency (hereinafter "the Agency") on July 12, 2016, with the exception of the e-mail exchange between the Agency's project manager and Dersch's consultant in June and July of 2016. (R.015 - R.027) Petitioner will highlight relevant portions of this e-mail exchange, as well as relevant portions of the hearing testimony in the argument infra.

OFFICIAL NOTICE

Dersch hereby renews its request that the Board take official notice of certain exhibits that were accepted in the Board's Opinion and Order denying summary judgment. (Opinion and Order, slip op. at pp. 2-6 (June 17, 2021)). Exhibits A through H to Petitioner's Motion for Summary Judgment are refiled herein. Many of these exhibits were relied upon by the Board in the Board's Factual Background, which is also being incorporated by reference herein. Petitioner is unaware of any legal rationale that would suggest a different ruling, particularly as official notice can be taken at any time, so long as opposing parties are given an opportunity to contest the material. (35 Ill. Adm. Code 101.630)

ARGUMENT

Legal Standards and Scope of Review

The Agency's denial or modification of a corrective action plan and associated budget may be appealed to the Board. See 415 ILCS 5/57.7(c)(4). Such Agency action must accompanied by an explanation of the legal provisions that may be violated if the plan is approved, a statement of specific reasons why the legal provisions might be violated, and an explanation of the specific type of information the Agency deems the applicant did not provide. (415 ILCS 5/57.7(c)(4)) On appeal to the Board, the Agency statements and explanation frame the issues. Abel Investments v. IEPA, PCB 16-108, slip op. at 3 (Dec. 15, 2016) The Board must decide whether Dersch's submittal to the Agency demonstrated compliance with the Act and the Board's rules. Id.

Petitioner has the burden of proof in these proceedings. Abel Investments v. IEPA, PCB

16-108, slip op. at 3 (Dec. 15, 2016). The standard of proof in UST appeals is a "preponderance of the evidence." Id. "A proposition is proved by a preponderance of the evidence when it is more probably true than not." Id. "The Board's review is generally limited to the record before IEPA at the time of its determination." Id. However, the purpose of this proceeding is to provide petitioners an opportunity to challenge the underlying decision pursuant to principles of fundamental fairness by submitting evidence and argument. EPA v. PCB , 138 Ill. App. 3d 550, 552 (3rd Dist. 1985) (the Board hearing "includes consideration of the record before the [Agency] together with receipt of testimony and other proofs under the panoply of safeguards normally associated with a due process hearing"). Accordingly, the Board has considered information outside the administrative record. See Estate of Slightom v. IEPA, PCB 11-25, slip op. at p. 6 (Jan. 19, 2012) (denying agency motion to reconsider order directing the Agency to file all of its documents, including those the Agency purports to not have relied upon in making its decision); KCBX Terminals Co. v. IEPA, PCB 10-110; PCB 11-43 (Consolidated), slip op. at pp. 5-7 (May 19, 2011) (similar).

Legal Background of the Leaking Underground Storage Tank Program

In September 1993, Title XVI of the Environmental Protection Act (hereinafter "the Act") (415 ILCS 5/57 to 57.17), known as the Leaking Underground Storage Tank Program (LUST Program), went into effect pursuant to Public Act 88-496. The purpose of the LUST Program is to provide for the remediation of underground storage tank sites due to the release of petroleum, including provision for an Underground Storage Tank Fund (hereinafter "the Fund" or "UST Fund") to pay for the associated work to perform this goal. (415 ILCS 5/57)

Any owner or operator intending to seek payment from the Fund "shall submit to the Agency for approval a corrective action budget that includes, but is not limited to, an accounting of all costs associated with the implementation and completion of the corrective action plan. (415 ILCS 5/57.7(b)(3)) In approving any plan, the Agency shall determine, by a procedure promulgated by the Board under Section 57.14, that the costs associated with the plan are reasonable, will be incurred in the performance of . . . corrective action, and will not be used for . . . corrective action activities in excess of those required to meet the minimum requirements of this Title." (415 ILCS 5/57.7(c)(3) (emphasis added))

Prior to Title XVI, the Agency enjoyed rulemaking authority, which it did not exercise. Instead, the Board described the program as follows:

> **The Agency interprets statutory language and applies it to a particular set of facts in determining which costs are eligible for reimbursement. When the Agency's decision is appealed to the Board, the Board determines whether the Agency's application of the statute was correct. The Board interprets the statutory language as it applies to the set of facts of the appealed case, i.e. adjudicating the contested case. While this is an acceptable procedure for interpreting the statute and establishing Agency policy, it places the applicant in the difficult position of working with a program that is not well defined and constantly changing. The applicant must depend on the statute, Agency personnel and, opinions from adjudicated cases to determine the policies relating to the UST program. The lack of specific guidelines for the UST fund increases the confusion of the applicant and complicates the reimbursement program. The applicant is forced to proceed with the remediation of the site, uncertain as to which costs are reimbursable.**

Platolene 500 v. IEPA, PCB 92-9, slip op. at p. 7 (May 7, 1992)

Title XVI addressed these difficulties by transferring rulemaking authority to the Board and requiring the Agency to review budgets. Rulemaking provides for clear interpretation of how statutory provisions are to be applied, thus reducing the uncertainty and need for as many

adjudicated cases. Budgets provide the applicant with certainty that the costs are reimbursable before being forced to proceed with remediation of the site. Since one of the primary purposes of the Fund is to provide financial assurance independent of the ability to pay of the owner or operator, certainty that costs will be reimbursed through this financial assurance mechanism is essential for the program to serve its purpose.

Still, the Agency has sometimes found it useful to maintain internal rate sheets to guide the reimbursement decisions of individual project managers. However because such rate sheets have an external affect on applicants, they violate the Administrative Procedure Act in the absence of promulgated rules. Illinois Ayers v. IEPA, PCB 03-214, slip op. at p. 16 (April 1, 2004) (finding "that, by definition, the rate sheet is a rule that the Agency should have promulgated pursuant to the APA). The finding that the Agency's secret rate sheet violated the law led directly to the to the promulgation of the Subpart H rates in Part 734 regulations.

While specific rates were promulgated for many tasks in Subpart H, professional consulting services were not given a maximum payment amount:

> **Payment for costs associated with professional consulting services will be reimbursed on a time and materials basis pursuant to Section 734.850. Such costs must include, but are not limited to, those associated with project planning and oversight; field work; field oversight; travel; per diem; mileage; transportation; vehicle charges; lodging; meals; and the preparation, review, certification, and submission of all plans, budgets, reports, applications for payment, and other documentation.**

35 Ill. Adm. Code § 734.845.

While personnel costs must not exceed the hourly rates in Appendix E of Part 734, the ultimate requirement for professional consulting services is that the amounts sought be

reasonable. 35 Ill. Adm. Code ¶ 734.850(b)[1] Reasonable costs are not the lowest costs that could be ascertained under the most favorable circumstances, but simply costs that are "fair, proper, just, moderate, suitable under the circumstances," though "[n]ot immoderate or excessive." (Black's Law Dictionary, 6th ed. 1990). The Agency explained at hearing that reasonableness does not come down to one specific rate, but allows for a range of costs. (Hrg. Trans. at p. 82)

All budgets must include "an estimate of all costs associated with the development, implementation, and completion of the corrective action plan, excluding handling charges." (35 Ill. Adm. Code § 734.335(b)) All budgets must be submitted to the Agency on forms prescribed and provided by the Agency. (35 Ill. Adm. Code § 734.135(a)) With respect to budgeting for consulting materials, the instructions to the form state:

> **Include on the form the costs associated with materials provided by the professional consulting service (that is, the primary consulting firm) including but not limited to lodging and per diems, mileage (or vehicle), private utility locator, permit fees, well survey fees, NFR Letter recording fees, manifests, copies, and other equipment and supplies (such as PID, FID, explosimeter, DO/ORPH/pH meters, hand augers, cameras/photo development, gloves, plastic bags, decon kit [for consultant's nondisposable field equipment] equipment to survey wells, peristaltic pump, purge pump, rope, bailers, measure wheel, transducer, data logger, water level indicator/interface probe, plastic tubing, metal detector, and barricades).**

(Petitioner's Ex. G, at p. 15 (brackets in original))

There is no place on the form to justify the reasonableness of rates. (Id.) However, if the the Agency needs more information, it can ask for it. See Knapp v. IEPA, PCB 16-103, slip op.

[1] Rates for consulting materials were proposed in the Part 734 rulemaking by one consultant, but none were ever promulgated. See United Science Industries Proposal dated Sept. 14, 2005 in Proposed Revisions to Leaking Underground Storage Tank Regulations Part 732 and 734, R2004-22(A)

9 (Sept. 22, 2016)

Since this appeal was filed, the Agency has created a secret rate sheet for consultants materials. (Hrg. Trans. at p. 73) The Agency's project manager is not a lawyer and did not appreciate all of the legal implications of testifying that the Agency had come to an agreement with consultants. There is no agreement; there are presumptive rates, just as there were before Illinois Ayers that have not been promulgated through rulemaking.[2] The secret rates were not utilized to deny reimbursement herein, but the factual background of this appeal takes place within the context of the Agency seeking to recreate internal guidance that was eventually found to be illegal before. For this appeal, the issues lie clearly within the framework of a contested case proceeding, interpreting and applying the requirement of reasonableness, which the parties agree is irreducible to a single rate in any event.

I. Consultant's Personnel Costs.

A. Cost of preparing Corrective Action Plan.

1. "Consulting Personnel Costs . . . by a Professional Geologist which lack supporting documentation [so that] the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act [and] this request is not reasonable as submitted," citing 35 Ill. Adm. Code 734.630(cc); 415 ILCS 5/57.7(c)(3); 35 Ill. Adm. Code 734.630(dd). (R.003)

[2] However, the rate sheet under discussion in Illinois Ayers "was developed using the average of a sample collected and adding one standard deviation." Slip op. at p. 7.

Professional Geologist, Corrective Action Plan Design and Preparation (R.083)	~~30.00 hours~~ **0 hours**	$111.76 per hour	~~$3,352.80~~ **$0.00**

While the Agency approved the Corrective Action Plan, it refused to reimburse the costs of designing and preparing it. The Agency's primary objection is that the consultant "didn't need to submit this Corrective Action Plan. You could have just added the costs for the boring, analysis, personnel (etc.) into your next Corrective Action Plan and budget." (R.015) An owner or operator cannot be required to proceed without an approved plan and budget. Board regulations and precedent are clear that an owner or operator who proceeds without a pre-approved plan and budget does so with the very real risk of receiving no payment from the UST Fund if the plan is denied. Illico Independent Oil Co v. IEPA, PCB 17-84, slip op. at p. 8 (Dec. 20, 2018). As explained earlier herein, the plan and budget process is for the protection of the applicant against the uncertainty that the work and costs will be approved. The CAP was approved, the Agency has to agree to pay for it.

Once a site investigation completion report is approved, "the owner or operator shall submit to the Agency for approval a corrective action plan designed to mitigate any threat to human health, human safety, or the environment resulting from the underground storage tank release." (415 ILCS 5/57.7(b)(2)) The owner or operator did so, but the plan was denied for the necessity to redo a boring previously approved by the project manager, necessitating a new corrective action plan.

Every corrective action plan, no matter how small or large, one boring or four, must

include all of the information required by the Act (415 ILCS 5/57.7(b)(2)), the Board's regulations (35 Ill. Adm. Code § 734.335(a)) and presumably the Agency's form (R.043 - R.046). A corrective action plan essentially contemplates all of the activities ultimately necessary to achieve a No Further Remediation Letter, including "at a minimum" current and projected uses of the property, and institutional controls. 415 ILCS 5/57.7(b)(2)) The original corrective action plan contained all of that information, and after it was denied, that information was used to prepare the new corrective action plan.

Nonetheless, Dilbaitis either believed that an approved plan was not necessary, or that the preparation costs should be submitted in a subsequent corrective action plan:

> **The time submitted to design and prepare the plan is too much (e.g. 30 hours for a PG for Corrective Action Plan design and preparation). This Corrective Action Plan has nothing to do with the Corrective Action Plan that was denied. None of the information from the previous Corrective Action Plan has anything to do with this Corrective Action Plan.**

(R.015)

As previously explained, both corrective action plans were legally required to contain certain common information, in addition to specific information relating to the specific task. The consultant's approach to the budget was reasonable: apportion common elements between the current and future plans and apply specific tasks to the specific plan:

> **Information gathered and prepared for the November 2015 CAP was used to prepare the current CAP adding the TACO boring; thus, a portion of the time from that original submittal was prorated and utilized for the current CAP (i.e. the base and information of the design document). The time to prepare and design the further soil sampling portion from the previous submittal was removed from the current budget. Conversely, the time for the preparation and design of the additional TACO boring was then added to the current CAP and budget.**

(R.018)

At the hearing, Dersch's consultant further explained that the previously denied plan was relatively simple in that it requested permission to conduct four borings. (Hrg. Trans. at p. 15) When it came time to create a new CAP for a single TACO boring, "all the time spent to set up a framework for the CAP and add all the history and knowledge and site investigation summary, and all that was already completed for the first [CAP]." (Hrg. Trans. at p. 15) This previous work had taken twelve hours, and the remaining 17 ½ hours was needed to complete the new CAP. (Hrg. Trans. at p. 14) Preparation of the first CAP took place in 2015 (R.098) and preparation of the second CAP took place in 2016 (R.028). It is not too soon for the Agency to review of a budget for this work.

Ultimately, multiple, sequential corrective action plans will result in certain additional fixed costs being incurred for each plan that could have been avoided with a single plan. The consultant offered the alternative of approving the original plan with a modification requiring the additional TACO boring. (R.018) The consultant could then submit a small budget amendment for the additional work. (R.018) Dilbaitis responded that "I won't do that" since he wanted to know the site specific parameters to review the rest of the plan. (R.015) This is his choice, but the direct implication of his choice are multiple plans at additional time and cost.

The CAP was approved without approving the corresponding budget for preparing it. The consultant's approach to apportioning costs between the current and future plans is reasonable, while apportioning no costs to prepare the plan and budget is entirely unreasonable.

B. The Costs of Preparing the Maps for the Corrective Action Plan.

2. "Consulting Personnel Costs associated with drafting the Corrective Action Plan which lack supporting documentation . . . [and] exceed the minimum requirements necessary to comply with the Act," citing 35 Ill. Adm. Code 734.630(cc); 415 ILCS 5/57.7(c)(3); 35 Ill. Adm. Code 734.630(o). (R.004)			
Draftsperson/CAD IV, Drafting for Corrective Action Plan (R.083)	~~6.00 hours~~ **1 hour**	$66.81 per hour	~~$400.86~~ **$66.81**

The Corrective Action Plan approved by the Agency included twelve maps. (R.049 - R.060)[3] The Agency decision letter stated that this corrective action plan only "requires one map, the proposed soil boring map. The additional 11 maps that were submitted are not needed and exceed the minimum requirements necessary to comply with the Act." (R.004) Since the project manager apparently does not think an actual plan was required in the first place, the rejection of these maps is contrary to the statute and regulations for the same reasons described in the previous section.

The consultant explained the role of maps in the plan:

> **We typically include the maps pertaining to the whole project, which if you reference site investigation and completion, you know, you've got all the maps there. And I believe the CAP form tells us to submit, you know, the**

[3] The index of maps indicates that one of the maps that was intended to be included in the corrective action plan was a groundwater elevation map (R.048), however it appears that a second groundwater analytical results map was submitted instead. (R.055; R.060) Given the Agency's justification for cutting these costs it does not appear that the mistake is material.

site maps, the base maps, your sample location map, and those kinds of things, so most project managers want to have all of that in front of them at one time when they're reviewing a plan.

(Hrg. Trans. at p. 16)

Why would certain project managers want those maps in the corrective action plans?

A. It's one of convenience. It's one step better than referencing a map back in a report prior. Otherwise you have to go back and look at the prior report to have the map in front of them. But the map would describe everything that's been done to date. The maps describe everything that's been done to date at the site.

(Hrg. Trans. at p. 16)

The project manager responded agreed, but characterized this corrective action plan as essentially a site investigation plan:

I get that they previously testified to some project managers -- most, but then I think they may have said want all of these maps. That may be true if we were doing an actual corrective action plan, but this is more of a site investigation plan.

(Hrg. Trans. at p. 49)

This is an actual corrective action plan, and there is nothing in the statute, regulations or forms that create a different status for a corrective action plan that involves borings versus dig-and-hauls. Furthermore, at the corrective action stage, there is far more data about the site and these maps should also be seen as an aid to identifying the location of the analytical results listed in Appendix C of the Corrective Action Plan. (R.061 - R.072)

The decision letter does not claim that the number of hours were unreasonable, but that they exceed the minimum legal requirements. Neither Board regulations nor the Agency form limit the number or nature of the site maps required for corrective action plans. The Agency's form expressly requires "Site map(s) meeting the requirements of 35 Ill. Adm. Code 732.110(a)

or 734.440." (R.045) This is a corrective action plan that needs to address all elements of corrective action, including maps typically found in corrective action plans. Nor does the decision letter identity the "specific type of information" that the Agency deems the applicant did not provide the Agency (415 ILCS 5/57.7(c)(4)(C)) and as such this claim appears to be mere surplusage and without merit.

C. The Cost of Analyzing the data pursuant to TACO regulations.

3. "Consulting Personnel Costs associated with preliminary contaminant transport modeling and TACO calculations which lack supporting documentation [and] the Illinois EPA cannot determine that the costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI," citing 35 Ill. Adm. Code 734.630(cc); 415 ILCS 5/57.7(c)(3). (R.004)			
Senior Project Manager, Contaminant Transport Modeling / Oversight / Technical Compliance (R.086)	~~6.00 hours~~ **0.00 hours**	$121.49 per hour	~~$728.94~~ **$0.00**
Professional Geologist, Preliminary Contaminant Transport Modeling & TACO Calculations (R.086)	~~20.00 hours~~ **0.00 hours**	$111.76 per hour	~~$2,235.20~~ **$0.00**

The Agency cut all costs associated with analyzing the data acquired from the soil boring in order to develop site-specific physical parameters. There can be no dispute that this analysis is required, the Agency decision letter states that "the soil sample needs to be collected for analysis." (R.003) The Agency project manager refused to approve the first CAP with the modification that the single TACO boring be added because "I need to see the site-specific Tier 2 soil remediation objectives and the site-specific modeling before I can make a determination on the Corrective Action Plan." (R.015) Again, this project manager wants the work to be performed, he just does not want to review a budget for the work until after the work is performed in direct contradiction to the purpose of requiring plans and budgets:

> **This is only an estimate on how long it will take the consultant to perform the modeling. The costs associated with the modeling and the determination of the site-specific Tier 2 soil remediation objectives should be submitted in the amended Corrective Action Plan that will be submitted to apply the modeling calculations. If the Consulting Personnel Costs associated with the Tier 2 calculations are submitted in the amended plan to address the results of this plan, the costs will be known and it will not be necessary to approve costs in excess of what is needed for the task or to approve additional costs if the original estimate did not include enough hours to complete the tasks.**

(R.004 (emphasis added))

A budget is an estimate. According to Board regulations, a "budget must include, but is not limited to, . . . an estimate of all costs associated with the development, implementation, and completion of the corrective action plan, excluding handling charges." (35 Ill. Adm. Code § 734.335(b) (emphasis added)) "In repeated cases the word 'estimate' has been held to be synonymous with 'opinion.'" Sampen v. Dabrowski, 222 Ill.App.3d 918, 925 (1st Dist. 1991). The approved corrective action plan calls for "site-specific physical characteristics of the soil be

determined by collecting a soil sample from the property and having it analyzed for the required TACO parameters." (R.037) This budget includes an estimate of the costs of analyzing the sample for the required TACO parameters.

The Agency's justification here is the same as the "actual cost budgets" that the Agency erroneously used to require until the Board ruled that the Agency was not authorized to review actual costs until the reimbursement stage. City of Benton Fire Department v. IEPA, PCB 17-01, slip op. at p. 6 (Feb. 22, 2018). While understandably actual costs budgets made it easier for the Agency to evaluate budgets, requiring actual costs in a budget is clearly not authorized by the Act or the Board regulations.

The time estimated for this work was based upon experience from previous projects:

> **Q. How did you derive at estimates for the time for these tasks?**
>
> **A. Based on what we normally see our people taking -- you know, at this particular time, they were probably taking 10 to 15 hours to do the TACO and the modeling, and we had additional hours in there to redo it after an excavation.**

(Hrg. Trans. at p. 19)

Carol Rowe has decades of experience in performing and overseeing TACO analysis, and therefore her opinion has significant weight. Since this is an estimate of future events, it can only be an opinion. And it is not clear what other support could be provided than past experience, and if there was, the Agency was required to identify the "specific type of information" that the Agency deems the applicant did not provide the Agency (415 ILCS 5/57.7(c)(4)(C)) and as such this claim appears to be mere surplusage and without merit. The project manager simply wants to review the work after it is performed in violation of the Act and

the Board regulations.

II. Consultant's Materials Costs

A. Photoionization Detector (PID).

4. "Consultant's Materials Costs associated with the use of a PID, which lack supporting documentation, [so that] the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act [and] the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable," citing 35 Ill. Adm. Code 734.630(cc); 415 ILCS 5/57.7(c)(3); 35 Ill. Adm. Code 734.850(b). (R.005)			
PID Rental, to detect VOC levels in soil samples (R.088)	~~1.00 Day~~ **0.00 Day**	$148.00 per day	~~$148.00~~ **$0.00**

In the Agency's initial e-mail, Dilbaitis requested justification for the need to use a PID, as well as for the rate charged for its use. (R.022) Dilbaitis withdrew the question about the necessity for the PID. (R.021) The consulting material costs utilize rates that have been approved by the Agency for decades:

> **The rates we use were originally developed from what others were charging in this field in the distant past (approximately 1991), adjusted for inflation a few times. In the preparation of this response, we did some checking online to compare our rates, and find them to be less than true rental rates. We are attaching a price list from one supplier we found because it has a comprehensive list of environmental equipment for rent, and the rates were similar to others we were finding. We searched and found many suppliers, this one just had the largest variety of equipment available in a single listing. Shipping, taxes, and the time we would have to spend ordering, cleaning and**

returning the items is obviously not included in these prices.

(R.019)

At the hearing, Dersch's consultant further clarified that Doug Oakley of the Agency had helped identify the range of rates being charged for consultants materials in the early 1990s. (Hrg. Trans. at p. 20) Oakley's explanation of the reimbursement process was the source of the Board's description of the contested case process in Platolene 500 v. IEPA, PCB 92-9, slip op. at p. 7 (May 7, 1992).

While the above support the reasonableness of the rate charged for use of the PID, the specific justification given for the reasonableness was a rental rate sheet from Envirotech. (R.023 - R.024) The model of the PID used by the consultant "is similar to the 3000 model from RAE" in that it measures in parts-per-billion (R.019), i.e. the ppBRAE 3000 which rents for $150.00 per day, plus additional fees and costs. (R.023)

The consultant further explained:

> **After doing some quick on-line research, all of our rental items rates appear to be comparable to significantly less than available rental rates for comparable equipment, especially once taxes, shipping, and the time required to locate, order, and return the item. For the items other than the PID, our time would cost more than the item rented. For instance, for us to rent a comparable PID from the attached pricelist, the daily rental rate for a ppb capable PID is $150 plus the cost of the calibration kit of $15, plus taxes and shipping. Just the rental rate alone is more than our requested rate.**

(R.020)

Pursuant to Board regulations, a "reasonable rate may be charged for the usage of [non-expendable] materials, supplies, equipment, or tools." (35 Ill. Adm. Code §734.630(h)) Rent is defined as "the compensation or fee paid, usually periodically, for the use of any rental property,

land, buildings, equipment, etc." See Black's Law Dictionary (6th ed. 1990). The consultant's explanation and supporting documentation is sufficient to establish that the $148 per day charge is a reasonable charge for the use of the equipment.

Furthermore, in 1991, the Agency determined that a $142.00 per day was a reasonable charge for use of a PID based upon a "comparison to market prices," and the Board subsequently affirmed the Agency's decision. Malkey v. IEPA, PCB 92-104, slip op. at p. 5 (March 11, 1993). Notably, the owner's consultant indicated that he had observed IEPA reimbursing charges up to $150.00 per day, which is what that consultant began charging thereafter. Id. This is consistent with the consultant's statements quoted above that its rates were based upon market rates extending back to the early 1990s, adjusted for inflation from time to time. Based upon the consumer price index, $142.00 in 1991 was worth approximately $250.00 in 2016. (Ex. H (U.S. Bureau of Labor Statistics CPI Inflation Calculator) The Board's decision in Malkey has precedential weight and in the absence of legally promulgated rates, "adjudicated cases . . . determine the policies relating to the UST program." Platolene 500 v. IEPA, PCB 92-9, slip op. at p. 7 (May 7, 1992).

Dilbaitis never identified a different market rate as had his predecessor in Malkey, but instead claimed that market rates from rental companies are inappropriate to determine a reasonable daily rate for using equipment. (R.016 - R.017) Instead, Dilbaitis stated:

> **It seems to me that the best way to determine a rate for a piece of equipment (PID) would be to take the initial price of the equipment, add in any expected indirect costs (batteries, expected costs for calibration, repairs, thorough cleaning from an equipment company, if applicable) then divide that total by the number of years the equipment is expected to last, then divide that by the number of days of expected use during a year.**

(R.016)

In other words, a consultant who purchased a $1,000 piece of equipment and used it once could charge $1,000, while a consultant that used it a thousand times could charge $1. Beyond the practical absurdities of this made-up standard, the consultant did not have this information, which is why they looked at rental rates:

> **The agency was trying to set rates for different pieces of equipment, and in one instance it would take the amount of the purchase price divided by the number of times you use it before it's broken. And further discussions were that the rate also needed to include time for, you know, calibrations, breakdowns, repairs, maintenance, and parts, et cetera, and we didn't have those or track those in any way that was -- or really in any way. All those charges just went off the general overhead charges, so we could not provide that information. So the next best thing was really market rates, which was the rental sheets.**

(Hrg. Trans. at p. 22)

The consultant did not have the information demanded and it would take years to compile. More importantly, the "Dilbaitis formula" is not a procedure promulgated by the Board. Had that standard of general applicability been adopted, then it would be expected that consultants provide documentation supporting the rate. The Agency does not have ratemaking authority. (5 ILCS 100/1-65 ("ratemaking" is the "exercise of control over the rates or charges for the products or services of any person, firm, or corporation") If it did, it would be required to "establish by rule, not inconsistent with the provisions of law establishing its ratemaking jurisdiction, the practice and procedures to be followed in ratemaking activities before the agency." (5 ILCS 100/5-25) The Agency cannot set rates, it can only propose rates to the Board through rulemaking. (415 ILCS 5/57.14A)

The Agency exceeded its statutory authority in seeking to create consultant-specific rates. The only question for the Agency is whether the "costs associated with the plan are reasonable." (415 ILCS 5/57.7(c)(3)) Reasonable costs are not the lowest costs that could be ascertained under the most favorable circumstances, but simply costs that are "fair, proper, just, moderate, suitable under the circumstances," though "[n]ot immoderate or excessive." (Black's Law Dictionary, 6th ed. 1990). In other words, reasonableness is a qualitative assessment that admits a permissible range of costs, but singles out those that stand out such as the Malkin consultant's charge of $310 per day for use of a PID. The Board has similarly never sought to set an hourly rate when reviewing the reasonableness of attorney fees. E.g., Dickerson Petroleum, Inc. v. IEPA , PCB 09-87, slip op. at pp. 8-9 (Dec. 2, 2010) (finding $165 to $295 per hour to be a reasonable range of hourly rates).

In summary, the Agency requested information to support the reasonableness of the rate charged and the consultant supplied market rates for temporary use of equipment. The rate charged was also reasonable under Board precedent in Malkin. Either demonstrate by a preponderance of evidence that $148.00 per day is a reasonable rate.

B. Measuring Wheel

5. "[I]ndirect corrective action costs for a measuring wheel charged as direct costs [and] are not reasonable," citing 415 ILCS 5/57.7(c)(3) of the Act; 35 Ill. Adm. Code 734.630(v). (R.005)			
Measuring Wheel, mapping sampling locations (R.088)	~~1.00 Day~~ **0.00 Day**	$21.00 per day	~~$21.00~~ **$0.00**

The Board granted summary judgment in favor of Petitioner as to this deduction. (Opinion and Order, slip op. at p. 26 (June 17, 2021))

C. Gloves

6. "Consultant's Materials Costs associated with gloves which lack supporting documentation [so that] the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act [and] the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable," citing 35 Ill. Adm. Code 734.630(cc); 415 ILCS 5/57.7(c)(3); 35 Ill. Adm. Code 734.850(b). (R.005)			
Disposable Gloves for soil sampling (R.088)	~~1.00 box~~ **0.00 box**	$16.00 per box	~~$16.00~~ **$0.00**

Unlike PIDs, gloves are materials purchased by the consultant that are expended in performing corrective action. The Agency's own forms state that the cost of gloves should be included on the form as materials provided by the consulting firm. Ex. G (Instructions for the Budget and Billing Forms); see also Knapp Oil Co. v. IEPA, PCB 16-13, slip op. at p. 6 (Sept. 22, 2016) (relying on same Instructions in finding that costs associated with camera are a reimbursable cost because Agency forms "have regulatory weight").

Dilbaitis requested information concerning the gloves as follows:

> **The Consultant's Materials Costs request the use of 1 box of gloves at $16.00 per box. We need to know what brand of gloves you're using and how big the box of gloves is. We'd prefer to see the invoice/receipt for the gloves you**

> **usually use to help determine the appropriate rate. Also, an entire box of gloves should not be used for the collection of a geotechnical sample. I would actually expect only 1 pair of gloves to be used.**

(R.022)

Before getting to the response, it is worth remembering that this is a budget for costs to be incurred in the future and only after the work is completed and reimbursement is sought are "invoices" or "receipts" submitted to the Agency. (35 Ill. Adm. Code § 734.605(b)(9)) The consultant responded:

> **On item 3, we cannot argue that we would use more than a couple of pairs of gloves, so just cut the entire cost, or pay the full retail price as a field purchase. Although not necessarily the brand and type we will use, but our most common glove used is Ansell model 69-210 in size large, which were purchased from Grainger. On the Grainger website, a box of those particular gloves are listed for $15.93, which doesn't include the sales tax and shipping, or any of our time to order the gloves. We requested $16.00. To count and document the number and type of gloves actually used on the project will cost more than $16.00.**

(R.020; see also R.025 (printout from Grainger website))

Historically, the Agency has paid for items such as disposable gloves as stock items, which are treated differently from field purchases in part because they are not eligible for handling charges. In other words, the Agency reimbursed the cost of stocking the items, not individual purchases. As the consultant explained:

> **We stock items like gloves, bailers, string, etc. We do not purchase these items specifically for a particular project. For instance, we stock multiple sizes and types of gloves, as some of our employees are allergic to latex, and a specific type of glove may not be able to withstand certain chemicals or concentrations of chemicals. We buy them by the case, and frequently find that when we go to reorder, a particular model is no longer available. To try to predict which brand and size of gloves that will be used on a particular project (or what were used and which order or orders they came from) is not practical. To purchase them individually, rather than provide them as stock**

> **items, would drive up the costs, and be a logistical nightmare (who has the partial box of gloves left for Croslow Shell and will they even fit me?). To do a fair assessment and to provide the real cost of a box of gloves, they cannot be provided as a stock item. They will be treated as a field purchase, and will be ordered, invoiced, shipped and tracked with documentation., along with all the appropriate time to do so. The invoice will be included in the reimbursement claim. There is no other way to provide you with the information you requested. Please note that the benefits of bulk purchasing are lost.**

(R.019)

The rate for gloves is based upon the typical cost of a box of gloves and it was less than the consultant has seen others charging. (Hrg. Trans. at p. 26) Given that the project manager objected to a rate based upon a box of gloves which the consultant did not expect to use completely, the consultant indicated that they would purchase gloves separately on the project for a higher cost and submit supporting documentation at the payment reimbursement stage:

> **[W]e would basically buy the gloves, and it would include the time for ordering the gloves, the shipping and the taxes, and then we would divide that up by the number of gloves that were used.**

(Hrg. Trans. at p. 27)

She estimated buying individually would probably cost $20, instead of $16. (Hrg. Trans. at p. 28) Therefore, $16 is reasonable, and even if the cost end up higher, if the Board reverses this budget cut, reimbursement would be capped at $16.

D. Water Level Indicator

7. "Consultant's Materials Costs associated with a water level indicator which lack supporting documentation [so that] the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act [and] the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable," citing 35 Ill. Adm. Code 734.630(cc); 415 ILCS 5/57.7(c)(3); 35 Ill. Adm. Code 734.850(b). (R.005 - R.006)			
Water Level Indicator for measuring groundwater depths	~~1.00 day~~ **0.00 day**	$28.00 per day	~~$28.00~~ **$0.00**

As with the PID Meter, the rate for a water level indicator has been approved by the Agency for decades. (R.019; Hrg. Trans. at p. 24) Since the legal issues are the same as with the PID Meter, they will not all be repeated in this section. The water level indicator used by Dersch's consultant is comparable to the "Solinst Mdl. 101/Heron Dipper-T: 100' - 300'," which can be rented for $30.00 (Hrg. Trans. at p. 24; R.023), plus "shipping, taxes, and the time we would have to spend ordering, cleaning and returning the items is obviously not included in these prices." (R.019) The consultant has several water level indicators, none of which have receipts, and is not certain which one they will end up using. (R.019, R.020) Given that the rate charged for using the water level indicator is less than market rental rates, the costs are reasonable.

E. Slug

8. "Consultant's Materials Costs associated with a slug used in hydraulic conductivity determination which lack supporting documentation [so that] the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act [and] the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable," citing 35 Ill. Adm. Code 734.630(cc); 415 ILCS 5/57.7(c)(3); 35 Ill. Adm. Code 734.850(b). (R.006)			
Slug to conduct slug test	~~1.00 day~~ **0.00 day**	$36.00 per day	~~$36.00~~ **$0.00**

This rate was based upon renting a slug a long time ago, and so the consultant used that rental rate for the rate charged here. (Hrg. Trans. at p. 25) The rate has been approved by the Agency for decades. (R.019) Since many of the legal issues are the same as with the PID Meter, they will not be repeated in this section. The Solinist Levelogger on the equipment rental sheet is comparable to the one used by Dersch's consultant. (Hrg. Trans. at p. 25) It cost $60.00 per day (R.023), plus "shipping, taxes, and the time we would have to spend ordering, cleaning and returning the items is obviously not included in these prices." (R.019) The consultant has several slugs, none of which they have receipts for, and is not certain which one they will end up using. (R.019, R.020) Given that the consultant's rate is far lower than market rates, the costs are reasonable.

F. Mileage.

9. "Consultant's Materials Costs associated with mileage costs which lack supporting documentation [so that] the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act [and] the request is not reasonable as submitted," citing 35 Ill. Adm. Code 734.630(cc); 415 ILCS 5/57.7(c)(3). (R.006 - R.007)			
Mileage, One round trip from Springfield Office for Drilling	310.00 miles	~~$0.65 per mile~~ **$0.54 per mile**	~~$201.50~~ **$167.40**

Without requesting supporting documentation (R.022), the Agency unilaterally reduced the mileage rate to $0.54 as the Agency has adopted an unpromulgated rule requiring the Federal mileage rate to be utilized in all cases. (R.017)

First, the modification is legally erroneous because it improperly imposes a rate without undergoing rulemaking. (5 ILCS 100/1-65 ("ratemaking" is the "exercise of control over the rates or charges for the products or services of any person, firm, or corporation") An agency wishing to establish a rate must do so "by rule, not inconsistent with the provisions of law establishing its ratemaking jurisdiction, the practice and procedures to be followed in ratemaking activities before the agency." (5 ILCS 100/5-25) The Agency cannot set rates, it can only propose rates to the Board for rulemaking. (415 ILCS 5/57.14A)

Moreover, while this particular rate is commonly adopted by other administrative agencies through rulemaking, the rate is simply not applicable to heavy trucks. For example, Central Management Services (hereinafter "CMS") has adopted the federal mileage rate for reimbursing government employees for use of their privately-owned vehicle on government

business. (80 Ill. Admin. Code § 3000.300(f)(2); see also 80 Ill. Admin. Code Appendix A ("Auto" reimbursement). In turn, the federal rule incorporated by CMS authorizes "[t]he Administrator of General Services [to] prescribe the mileage reimbursement rates for use on official business of privately owned airplanes, privately owned automobiles, and privately owned motorcycles while engaged on official business." (5 U.S. Code § 5707(b)(1)) (emphasis added)[4] Federal regulations define "privately owned automobiles" as "[a] car or light truck (including vans and pickup trucks) that is owned or leased for personal use by an individual." 41 CFR § 300-3.1 (emphasis added).

Dersch's consultant uses heavy-duty trucks that get about 20 miles per gallon, while light duty passenger vehicles typically have fuel economy of thirty or more miles per gallon. (Hrg. Trans. at p. 29) They need heavy duty trucks because they carry a lot of equipment. (Id.) Just in terms of fuel costs, it will cost at least fifty percent more to use a heavy-duty truck than a standard passenger vehicle.[5]

The rate imposed by the Agency via an unpromulgated rule was established to reimburse government employees for the use of the typical personal vehicle that employees might use to commute to work from home, not the type of heavy commercial vehicles used to bring equipment to drilling and excavation job sites. The distinction is exemplified by Congress' instructions to the Administrator of General Services to investigate separate rates for motorcycles, which are also common personal vehicles, but may differ in numerous factors that needed to be considered,

[4] This rate is also the "standard mileage rate" used by the Internal Revenue Service (5 U.S. Code § 5707(b)(2)(A)(I)), though not the exclusive rate.

[5] In other words, in order for a truck that gets 20 mpg to drive 30 miles, the truck will need 1 ½ gallons of fuel.

including:

(i) depreciation of original vehicle cost;

(ii) gasoline and oil (excluding taxes);

(iii) maintenance, accessories, parts, and tires;

(iv) insurance; and

(v) State and Federal taxes.

(5 U.S.C. § 5707(b)(1)(B))

All of these factors impose greater costs on heavy commercial trucks in comparison to standard passenger vehicles, and were the federal government to investigate rates for heavy trucks they would certainly arrive at higher reimbursement rates for employees. However, the purpose of the federal rate has never been to set market rates for business purposes.

Moreover, Subpart H rates for travel are not limited to mileage reimbursements, but include payment of all of consultant costs for "travel; per diem; mileage; transportation; [and] vehicle charges." (35 Ill. Adm. Code 734.845) Charging a mileage rate that takes into consideration the nature of the vehicle used for transportation is entirely consistent with the regulations and permits a fair break down of costs in the event work is performed at more than one work site in a given day. See Abel Investments v. IEPA, PCB 16-108, slip op. at p. 9 (Dec. 15, 2016) (consultant may apportion mileage between jobs). Prior to Subpart H regulations, the Agency reimbursed "travel only by automobile . . . at a rate of 50 cents a mile." City of Roodhouse v. IEPA, PCB 92-31, slip op. at p. 8 (Sept. 17, 1992). It is not clear whether this meant that the Agency had a different internal reimbursement rate for trucks, or how much they diverged, but 50 cents a mile is almost double the federal mileage rate in 1991.

The Agency did not give the consultant an opportunity to justify their rates, nor does the decision letter identity the "specific type of information" that the Agency deems the applicant did not provide the Agency (415 ILCS 5/57.7(c)(4)(C)). Instead, the Agency improperly imposed the federal rate as an unpromulgated rule and therefore Petitioner did not exceed the minimum requirements of the Act because the Act does not impose the federal rate as a rule. Furthermore, the difference of eleven cents per mile is insufficient to establish that the rate charged by Petitioner's consultant was unreasonable on its face given the various additional costs for heavy commercial vehicles such as the cost of the vehicle, fuel, maintenance and taxes.

G. Copying.

10. "Consultant's Materials Costs associated with copies which lack supporting documentation [so that] the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act [and] the request is not reasonable," citing 35 Ill. Adm. Code 734.630(cc); 415 ILCS 5/57.7(c)(3) (R.007)			
Copies of Corrective Action Plan / Draft / Forms	~~800.00 pages~~ **192 pages**	$0.15 per page	~~$120.00~~ **$28.80**
Copies of Corrective Action Budget	~~200.00 pages~~ **56 pages**	$0.15 per page	~~$30.00~~ **$8.40**
Copies of Field/Plan/Maps/ Borelogs	~~100.00 pages~~ **0 pages**	$0.15 per page	~~$15.00~~ **$0.00**

11. "Consultant's Materials Costs associated with copies for the Corrective Action Plan and Budget which lack supporting documentation [so that] the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act [and] the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable," citing 35 Ill. Adm. Code 734.630(cc); 415 ILCS 5/57.7(c)(3); 35 Ill. Adm. Code 734.850(b).			
Copies of Corrective Action Plan / Draft / Forms	~~800.00 pages~~ **192 pages**	~~$0.15 per page~~ **$0.00 per page**	~~$120.00~~ **$0.00**
Copies of Corrective Action Budget	~~200.00 pages~~ **56 pages**	~~$0.15 per page~~ **$0.00 per page**	~~$30.00~~ **$0.00**
Copies of Field/Plan/Maps/ Borelogs	~~100.00 pages~~ **0 pages**	~~$0.15 per page~~ **$0.00 per page**	~~$15.00~~ **$0.00**
12. "Consultant's Materials Costs associated with copies for the reimbursement claim which lack supporting documentation [so that] the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of Title XVI of the Act [and] the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable," citing 35 Ill. Adm. Code 734.630(cc); 415 ILCS 5/57.7(c)(3); 35 Ill. Adm. Code 734.850(b). (R.007 - R.008)			
Copies of Corrective Action Reimbursement	1,000.00 pages	~~$0.15 per page~~ **$0.00 per page**	~~$150.00~~ **$0.00**

The Agency cut all of the copying costs in the budget in three steps. First, the Agency cut the number of pages for the corrective action plan, budget and associated maps down to 248

pages, resulting in a total of $127.80 in cuts. Second, the Agency cut the rate charged per page of copying these documents from $0.15 per page to $0.00 per page, resulting in an additional $37.20 in cuts. Third, the Agency also cut the rate charged per page for copies of the reimbursement request from $0.15 per page to $0.00 per page, resulting in an additional $150.00 in cuts.

We will first address the rate cut since it is common to all documents and if the Board is inclined to approve a $0.00 per page reimbursement rate, it really does not matter how many pages are copied. Furthermore, the Agency only asked for the consultant to support the copy rate. (R.022)

In response to the Agency's request for support for its rate, the consultant replied that they are charging the same rate as the Agency. (R.020; R.027) Dilbaitis replied that the Agency doesn't charge for the first 400 copies for Freedom of Information Act requests. (R.016)

While the Agency's rate of fifteen cents per page is sufficient evidence to demonstrate as a factual matter that the consultant's rate is reasonable, the legal nature of the evidence requires further elucidation. The Agency's rules pertaining to access to public records states: "No fees shall be charged for the first 50 pages of black and white, letter or legal sized copies requested by a requester. The fee for black and white, letter or legal sized copies shall not exceed 15 cents per page." (35 Ill. Adm. Code § 1828.602(a)) This language is taken entirely from the Illinois' Freedom of Information Act (hereinafter "FOIA"). (5 ILCS 140/6(b)) Whether of not the Agency in practice charges for the first 400 copies as Dilbaitis claims, the Agency's legal position in its rules is that it can charge fifteen cents per page for all but the first 50 pages.

Moreover, FOIA does not purport to set market rates, it sets discounted rates. The overall

purpose of FOIA to provide public access to information "necessary to enable the people to fulfill their duties of discussing public issues fully and freely, making informed political judgments and monitoring government to ensure that it is being conducted in the public interest." (5 ILCS 140/1) Thus, a primary duty of public bodies is to provide such access, "fiscal obligations notwithstanding." (Id.) Accordingly, public bodies cannot charge for the first 50 pages copied (5 ILCS 140/6(b)), must recognize requests for fee waivers or reductions deemed in the public interest (5 ILCS 140/6(c)), and are generally incentivized to maintain public records online so that the public need not be charged at all in most instances. (5 ILCS 140/8.5). The Illinois General Assembly appears to have found fifteen cents per page to be a reasonable rate to balance the compelling interests of broad public access with the costs of administering the FOIA program. Therefore, there is no basis to ignore the fifteen cent rate charged by the Agency because the first fifty pages are free.

Furthermore, the FOIA rates can be exceeded when "otherwise fixed by statute." (5 ILCS 140/6(b)) Thus, the FOIA rates do not apply when the Property Tax Code authorizes County Assessors to charge a higher rate since the legislature had determined what is reasonable under one statute may be different than what is reasonable in another. Sage Information Services v. Henderson, 397 Ill.App.3d 1060, 1064 (3rd Dist. 2010); see also 35 ILCS 200/14-30 (Property Tax Code requires the Chief County Assessor to make available "all public records of the chief county assessment officer for a fee of 35 cents per page of legal size or smaller and $1 for each larger page.") Another common statutory copying rate not subject to FOIA is in the the Clerks of Courts Act, which authorizes Circuit Clerks to charge for photocopying no more than "(A) $2 for the first page; (B) 50 cents per page for the next 19 pages; and (C) 25 cents per page for all

additional pages." (705 ILCS 105/27.1b(n)(2))

The most relevant statutory copying rates, however, are those set for professional services outside of government. The Inspection of Records Act requires health care providers to fulfill patient requests for medical records, charging all reasonable expenses, including "for paper copies 75 cents per page for the first through 25th pages, 50 cents per page for the 26th through 50th pages, and 25 cents per page for all pages in excess of 50." (735 ILCS 5/8-2001(d))[6] Similarly, an attorney is required to provide his or her former client with copies of the client file (other than attorney work product) for the same costs. (735 ILCS 5/8-2005) These rates are analogous to what professional consultants should permissibly be allowed to charge their clients.

The fees established by the legislature and supreme court for copying charges are helpful in examining the reasonableness of fees in this case. Miller v. Pollution Control Board, 267 Ill. App. 3d 160, 173 (4th Dist. 1994) (finding the $4.00 per page charged by court reporter excessive given that the Illinois Supreme Court had only authorized copying charges of $0.50 per page for court reporters). All of these statutes support the conclusion that $0.15 per page for copies is reasonable, as the legislature has authorized charges of up to 75 cents for professional services and there is no basis for exempting the first 50 pages of documents copied that has any relevance outside of the specific statutory objectives of FOIA.

Dersch's consultant testified that their copying rate was raised to 15 centers per page after they purchased a new copier and seen what businesses were charging them for copying. (Hrg. Trans. at p. 30) They also consulted their accounting firm to see what they were charging and

[6] These copying fees are adjusted annually by the Illinois Comptroller's Office based upon a Consumer Price Index and made available to the public via the Comptroller's official website published on-line. (735 ILCS 5/8-2006)

what they had seen being charged, and based upon that, fifteen cents per page seemed fair. (Hrg. Trans. at p. 30)

With respect to the number of pages copied, Dilbaitis did not ask for justification from the consultant. However, in the cover letter to the previous corrective action plan and budget, the consultant explained:

> **Finally, please note that the number of copies budgeted for reports and claims are not just the number of pages submitted to the Agency. The number of copies also includes drafts, client copies, and our own copies of reports, budgets, and claims. We trust that you'll give serious weight to our requests and consider the necessity of a reimbursement budget that mirrors the way we work in actuality as does the Agency.**

(R.099)

In fact, Board regulations require the owner/operator to maintain a copy of all submittals, including books, records, documents, and other evidence directly pertinent to these submittals. (35 Ill. Adm. Code § 734.655) Despite this clear legal obligation, the Agency only recognized the two copies of the CAP it received as necessary. (R.007)

Dersch's consultant explained the number of copies of the CAP:

> **We have the preliminary draft that goes out for review, and then there's a modified draft that goes back out to verify that all the changes that were needed were made. When that's complete, we send a draft to the client for them to sign and look over, and then we do a submittal to the agency, and we have four copies.**

(Hrg. Trans. at p. 31)

The same practice applies to budgets. (Id.) Dersch's consultant does not typically count pages while the plan and budget are being put together, but you an estimate based upon previous submittals. (Id.) At the reimbursement phase, they will have the actual number log report on the

copier to document the number of pages logged to the site. (Id. at p. 32) This approach has been accepted by the Agency in the past. (Id.)

In addition, copies of documents are produced for use in the field:

> **Q. What does the entry for field/plan/maps/borelogs refer to?**
> **A. This is -- before we go out in the field, we set up folders with the drilling plans laid out, and it includes, you know, copy of the agency letter, it includes blank borelogs, and it includes multiple maps that we might be interested in having with us. It's got the JULIE log-in sheet. Usually that goes in the folder, too.**
>
> **So this all goes out to the field, gets filled out, and then some of the pieces end up getting copied again, especially the field reports and the maps for a file copy.**

(Hrg. Trans. at p. 30)

Apparently, since none of the field copies were delivered to the Agency these were all rejected, but the field workers need copies of documents to perform the work.

The Agency also denied the need for any copies for the reimbursement claim, though this appears to be entirely due to rejecting the 15 cent rate and not due to the number of copies.

Overall, the number of copies in the budget were estimates sufficient for the budget stage; the actual number of copies will be identified once all the work is performed and reimbursement is sought. The rates charged are comparable to market rates and less than those professional consultants are allowed to charge under other statutes.

CONCLUSION

The Board's regulations require payment of professional consulting services on a time and material bases. The Project Manager refused to pay for work already performed or work he stated needed to be performed, because these are simply estimates and he wanted to evaluate the reasonableness of the time at some later date, that may or may not come. Title XVI requires the Agency to review budgets for such work now, and does not permit it to review actual costs in lieu of budgets. With respect to consulting materials, the Project Manager failed to evaluate the reasonableness of the costs on the Agency's own terms, namely that reasonableness allows for a range of permissible costs. Instead, and as part of a larger, longer term goal of recreating the invalid rate sheets, he imposed unpromulgated standards, particularly his formula of general applicability for calculating equipment rates. The rental rate sheet supplies a preponderance of evidence that the rates charged are reasonable, as is the information that with respect to the other charges.

WHEREFORE, Petitioner, DERSCH ENERGIES, INC., prays that the Board find the Agency erred in its decision, direct the Agency to approve the budget as submitted, allow Petitioner to submit proof of legal costs, and for such other and further relief as the Board deems meet and just.

DERSCH ENERGIES, INC.,
Petitioner

By its attorneys,
LAW OFFICE OF PATRICK D. SHAW

By: /s/ Patrick D. Shaw

Patrick D. Shaw
LAW OFFICE OF PATRICK D. SHAW
80 Bellerive Road
Springfield, IL 62704
217-299-8484
pdshaw1law@gmail.com

LEAKING UST TECHNICAL REVIEW NOTES

Reviewed by: Brad Dilbaitis
Date Reviewed: 4/11/2007

File Heading: LPC #1010155024 -- Lawrence County
Lawrenceville/ Croslow's Shell
1421 Lexington Avenue
Leaking UST Incident No. 20050374
LUST Technical File

Documents Reviewed:

2/23/2007 Stages 2 and 3 Site Investigation Plan and Stage 1 Costs—received 2/27/2007
Division File

General Site Information:

Site subject to: 734

IEMA dates: 3/17/2005	Reimbursement (Y/N/unknown): yes
UST System removed (Y/N): yes-removed 5/5/05	OSFM Fac. ID #: 7-009254
Encountered Groundwater (Y/N/unknown): yes	SWAP mapping and evaluation completion date: 4/12/2007
Free Product (Y/N/unknown): no	Site placement correct in SWAP (Y/N): yes
Current/Past Land Use: Automotive repair facility	MTBE > 40 ppb in groundwater (Y/N/unknown): yes--monitoring wells MW-3, MW-4 and MW-5 also had MTBE contamination at 0.21 mg/l, 0.26 mg/l and 0.16 mg/l, respectively
Size & Product of Tanks: (3) 6,000-gallon gasoline and (1) 1,000-gallon diesel USTs	

Summary of Stage 1 Site Investigation notes:

- Ten soil borings were completed to a depth of twenty feet, or refusal in bedrock
- Five borings (B-1 through B-1) were completed as monitoring wells
- Soil samples collected every five foot interval and analyzed for BTEX and MTBE
- Borings B-1 through B-4 were advanced at the property lines and completed as monitoring wells
- Benzene soil contamination discovered in borings:
  - B-1 (0.16 mg/kg at 13 ft bls),
  - B-3 (0.8mg/kg at 7.5 ft and 0.13 mg/kg at 12.5 ft)
  - B-4 (4.7 mg/kg at 7.5 ft and 0.82 mg/kg at 12.5 ft)
- Soil impaction defined to the north by B-2
- B-4 is located directly to the south and downgradient from the tank pit
- B-5 was drilled along the supply lines and was completed as a monitoring well to determine the maximum concentration level at the site for accurate Tier II modeling
- B-6 was advanced to the west side of the tank pit
- B-7 was drilled to the east side of the tank pit

- B-8 was advanced on the north side of the tank pit
- B-9 and B-10 were advanced for characterization of the remaining line area and dispensers
- Monitoring well MW-1 had benzene contamination at 0.038 mg/l
- Monitoring well MW-3 had benzene contamination at 0.24 mg/l
- Monitoring well MW-4 had benzene contamination at 0.065 mg/l
- Monitoring well MW-5 had benzene contamination (1.0 mg/l) and ethylbenzene contamination (3.1 mg/l)
- Monitoring wells MW-3, MW-4 and MW-5 also had MTBE contamination at 0.21 mg/kg, 0.26 mg/l and 0.16 mg/l, respectively
- Results of Stage I indicate soil and groundwater contamination extends off site to the east, south and west

Stage 1 Summary of Costs:

Drilling and Monitoring Well Costs	$4,944.00
Analytical Costs	$2,870.00
Remediation and Disposal Costs	$800.00
UST Removal and Abandonment Costs	$0.00
Paving, Demolition, and Well Abandonment Costs	$1,000.00
Consulting Fees	$8,450.75
Total Stage 1 Costs	**$18,067.75**

- All costs in accordance with Subpart H
- Included costs for abandonment of the five monitoring wells—costs associated with monitoring well abandonment must be included in the CAP budget {734.310(b)}
- Will cut the $1,000.00 for well abandonment for the 5 monitoring wells

Site Specific TACO parameters:

Hydraulic conductivity (k)	7.67×10^{-5} cm/sec (collected from MW-1)
Soil bulk density (ρ_b)	2.09 g/cm^3 (Collected from B-2 at 6' bls)
Soil particle density (ρ_s)	2.66 g/cm^3 (Collected from B-2 at 6' bls)
Moisture content (w)	0.25 g_{water}/g_{soil} (Collected from B-2 at 6' bls)
Organic carbon content (f_{oc})	0.003 g/g (Collected from B-2 at 7.5' bls)

Stage 3 sampling plan:

- One on site boring is proposed for further delineation—approximately 20 feet to the west of the northwest corner of the onsite building
- Impacted soil and groundwater extend off site west, south and east of the site
- Off site permission to the west has already been obtained—site utilized as a bank branch, and the owner requested that the boring be completed in the grass
- Location of boring proposed may have to be moved 10 or 20 feet based on field conditions
- Off site permission to the south has already been obtained—however, only a piezometer (not a dedicated well) that was to be immediately plugged following sampling—owner requested that sampling be done in a grass area and the parking lot not be disturbed (asphalt parking lot and Pizza Hut restaurant)

- Permission to set a dedicated well will be requested—assuming permission is granted the well will be installed .
- Consultant requesting an indication in the response that the piezometer is acceptable in the event the owner does not allow the well
- Property owner to the east has not been contacted (asphalt drive and car wash)

Illinois EPA Recommendation/Comments:

- Proposed on site boring to the west of the building is needed for further delineation—completing another on site boring to the east of the on site building should be done to further delineate on site contamination on the northeastern quarter of the property, which is downgradient(ish) from the contamination
- Boring will be completed with the same respect to the building as proposed boring B-11 (i.e. roughly 20 feet to the east of the northeast corner of the onsite building) and will be completed as a monitoring well
- No proposed budget for Stages 2 and 3—will modify Stage 1 costs

BJD\Stage2&3SIPBUDnotes.doc

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 – (217) 782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 – (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

217/782-6762

CERTIFIED MAIL
7004 2510 0001 8621 9914

APR 17 2007

Dersch Energies, Inc.
Mr. Tom Dersch
P.O. Box 217
Mt. Carmel, Illinois 62863

Re: LPC #1010155024 -- Lawrence County
Lawrenceville/ Croslow's Shell
1421 Lexington Avenue
Leaking UST Incident No. 20050374
Leaking UST Technical File

RELEASABLE

MAY 18 2007

REVIEWER MD

Dear Mr. Dersch:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the Stage 2 and 3 Site Investigation Plan (plan) submitted for the above-referenced incident. This plan, dated February 23, 2007, was received by the Illinois EPA on February 27, 2007. Citations in this letter are from the Environmental Protection Act (Act), as amended by Public Act 92-0554 on June 24, 2002, and 35 Illinois Administrative Code (35 Ill. Adm. Code).

The Illinois EPA requires modification of the plan; therefore, the plan is conditionally approved with the Illinois EPA's modifications. The Illinois EPA has determined that the modification listed below is necessary to demonstrate compliance with Title XVI of the Act and 35 Ill. Adm. Code 734 (Sections 57.7(a)(1) and 57.7(c) of the Act and 35 Ill. Adm. Code 734.505(b) and 734.510(a)).

In order to further delineate onsite contamination on the northeastern quarter of the property, a soil boring will be completed approximately 20 feet to the east of the northeast corner of the onsite building. The boring will be completed as a monitoring well. Soil and groundwater analysis will be conducted and the results of that analysis will be included in the next submittal.

The actual costs for Stage 1 are modified pursuant to Sections 57.7(a)(2) and 57.7(c) of the Act and 35 Ill. Adm. Code 734.505(b) and 734.510(b). Based on the modifications listed in Section 2 of Attachment A, the amounts listed in Section 1 of Attachment A are approved. Be aware that the amount of payment from the Fund may be limited by Sections 57.8(d), 57.8(e), and 57.8(g) of the Act, as well as 35 Ill. Adm. Code 734.630 and 734.655.

NOTE: The plan proposes activities that are technically acceptable as modified in this letter. However, this letter does not constitute Illinois EPA approval of any costs incurred during the completion of such activities. Owners and operators are advised that they may not be entitled to full payment for this reason.

PETITIONER'S EXHIBIT B

PENGAD 800-631-6989

The Illinois EPA will review your complete request for partial or final payment from the Underground Storage Tank Fund after it is submitted to the Illinois EPA.

Pursuant to Sections 57.7(a)(5) and 57.12(c) and (d) of the Act and 35 Ill. Adm. Code 734.100 and 734.125, the Illinois EPA requires submittal of a Site Investigation Completion Report within 30 days after completing the site investigation to:

Illinois Environmental Protection Agency
Bureau of Land - #24
Leaking Underground Storage Tank Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794-9276

Please submit all correspondence in duplicate and include the Re: block shown at the beginning of this letter.

An underground storage tank system owner or operator may appeal this decision to the Illinois Pollution Control Board. Appeal rights are attached.

If you have any questions or need further assistance, please contact Brad Dilbaitis at (217) 785-8378.

Sincerely,

Hernando A Albarracin

Hernando A. Albarracin
Unit Manager
Leaking Underground Storage Tank Section
Division of Remediation Management
Bureau of Land

HAA:BJD\2&3SIPmodCOST1modNOBUD.doc

Attachment: Appeal Rights
Attachment A

c: Applied Environmental Technologies, Inc.
BOL File

Attachment A

Re: LPC # 1010155024 -- Lawrence County
Lawrenceville/ Croslow's Shell
1421 Lexington Avenue
Leaking UST Incident No. 20050374
Leaking UST Technical File

SECTION 1

STAGE 1 Actual Costs

As a result of the Illinois EPA's modifications in Section 2 of this Attachment a, the following amounts are approved:

$4,944.00	Drilling and Monitoring Well Costs
$2,870.00	Analytical Costs
$800.00	Remediation and Disposal Costs
$0.00	UST Removal and Abandonment Costs
$0.00	Paving, Demolition, and Well Abandonment Costs
$8,235.00	Consulting Personnel Costs
$215.75	Consultant's Materials Costs

Handling charges will be determined at the time a billing package is reviewed by the Illinois EPA. The amount of allowable handling charges will be determined in accordance with Section 57.8(f) of the Environmental Protection Act (Act) and 35 Illinois Administrative Code (35 Ill. Adm. Code) 734.635.

SECTION 2

STAGE 1 Modifications

$1,000.00 for costs for the abandonment of five groundwater monitoring wells. In accordance with 35 Ill. Adm. Code 734.310(b), costs associated with monitoring well abandonment must be included in the corrective action budget.

BJD\2&3SIPmodCOST1modNOBUDA.doc

Appeal Rights

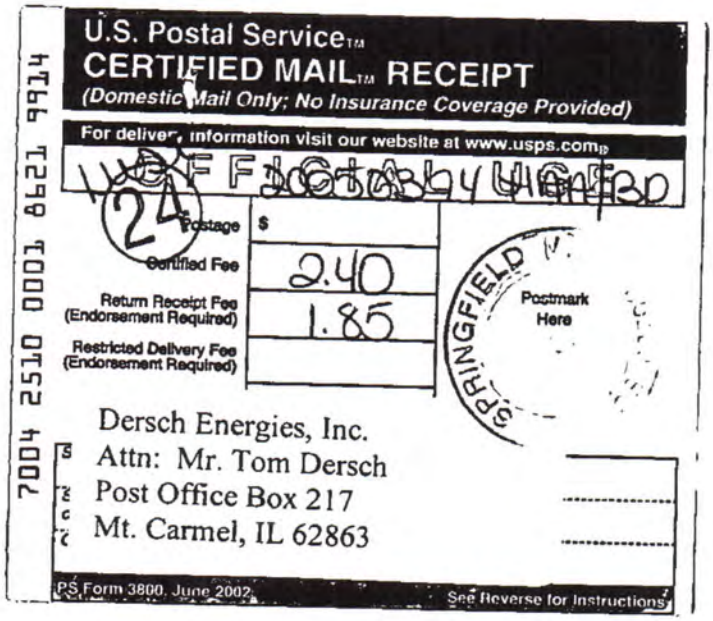
An underground storage tank owner or operator may appeal this final decision to the Illinois Pollution Control Board pursuant to Sections 40 and 57.7(c)(4) of the Act by filing a petition for a hearing within 35 days after the date of issuance of the final decision. However, the 35-day period may be extended for a period of time not to exceed 90 days by written notice from the owner or operator and the Illinois EPA within the initial 35-day appeal period. If the owner or operator wishes to receive a 90-day extension, a written request that includes a statement of the date the final decision was received, along with a copy of this decision, must be sent to the Illinois EPA as soon as possible.

For information regarding the filing of an appeal, please contact:

Dorothy Gunn, Clerk
Illinois Pollution Control Board
State of Illinois Center
100 West Randolph, Suite 11-500
Chicago, IL 60601
312/814-3620

For information regarding the filing of an extension, please contact:

Illinois Environmental Protection Agency
Division of Legal Counsel
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794-9276
217/782-5544



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Restricted Delivery Fee (Endorsement Required)	

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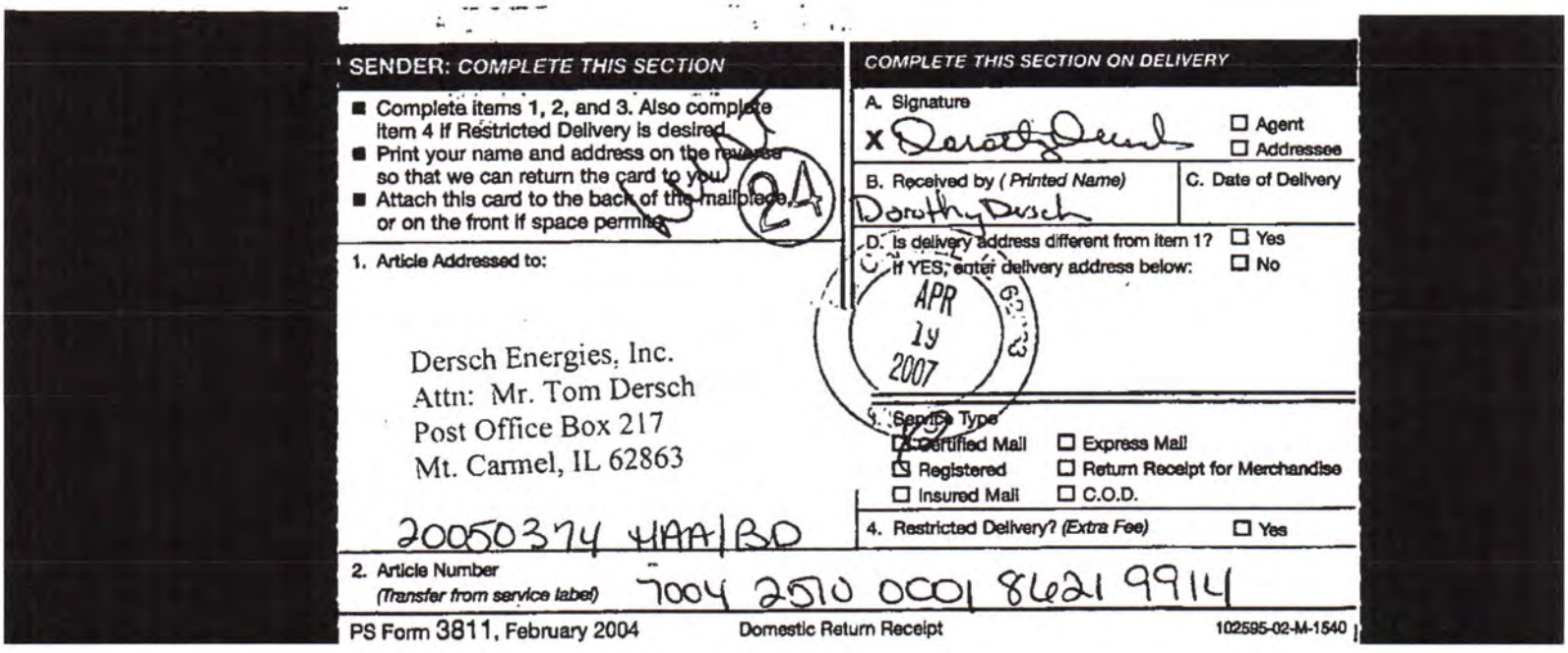
SPRINGFIELD IL

Dersch Energies, Inc.
Attn: Mr. Tom Dersch
Post Office Box 217
Mt. Carmel, IL 62863

7004 2510 0001 8621 9914

PS Form 3800, June 2002 See Reverse for Instructions



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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

24

1. Article Addressed to:

Dersch Energies, Inc.
Attn: Mr. Tom Dersch
Post Office Box 217
Mt. Carmel, IL 62863

20050374 HAA/BD

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Dorothy Dersch ☐ Agent ☐ Addressee

B. Received by (Printed Name) Dorothy Dersch
C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

APR 19 2007

3. Service Type
☐ Certified Mail ☐ Express Mail
☒ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

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Illinois Environmental Protection Agency

P.O. Box 19276 Mail Code #

Springfield, Il 62794-9276

24

B030

CW³M Company
Environmental Consulting Services

701 W. South Grand Avenue
Springfield, IL 62704

Phone: (217) 522-8001
Fax: (217) 522-8009

June 11, 2013

Mr. Brad Dilbaitis, Project Manager
LUST Section, Bureau of Land
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, IL 62794-9276

RE: LPC #1010155024—Lawrence County
Croslow's Shell / Dersch Energies, Inc.
1421 Lexington Avenue, Lawrenceville, Illinois 62439
Incident Number: 2005-0374
LUST Technical Reports — Budget for Stage 2/3 Site Investigation Activities

Dear Mr. Brad Dilbaitis:

On behalf of Mr. Tom Dersch, Vice President of Dersch Energies, Inc. which owns the USTs at the above referenced site, we are submitting the attached budget for the Stage 3 Site Investigation Plan (SIP). The Stage 3 SIP was submitted to the Agency by Applied Environmental Technologies, Inc. on February 27, 2007 but did not include a budget. The Agency approved the plan on April 17, 2007.

CW³M Company works in a similar structure as the Agency. Numerous personnel are involved with various components, i.e. phase review and approval of plans, budgets, reimbursements, and correspondence. In our opinion, this is a highly efficient work plan that limits mistakes, keeps costs down, and ensures quality work. Please note multiple personnel are listed for the completion of certain tasks. Some reviewers have mistakenly interpreted this as an error or duplication; it is not. The method for calculating personnel time in the proposed budget has been approved by the Agency in other incidents, such as, incident numbers 2007-1408, 2008-1202, 2008-1657, 2008-1543, 2009-1270, 2009-0929, 2011-0837, and 2011-0822. These hours have been found reasonable and justified as an estimate for the work proposal. These hours should be deemed reasonable as more than one person is required to develop plans and budgets and to check for accuracy of the plan, budget, bore logs, reimbursement claims, and analytical, which is needed to finalize the plan and budget. This is no different than the Agency's review process, which includes project managers, unit managers, fiscal reviewers, etc. Multiple personnel touch each letter or plan with different individual tasks on assignments. Many plans and budgets are even taken to committees.

In addition, we have had recent conversations with Tom Henninger and Hernando Albarracin about personnel in the budgets and reimbursements. Some Agency

reviewers have been cutting budget and reimbursement line items for technical personnel. Similar to the Agency, technical personnel are required to prepare and review reimbursement claims. Some plans span over several years, include multiple drilling events, and have multiple personnel involved. With such complexity, technical personnel familiar with the project are required to work with the accounting technicians to develop reimbursement claims. As your technical personnel should be well familiar, there are many technical components to the reimbursement side of the equation. It is not all just accounting. Currently, the Agency has technical staff involved with the review of claims; their billing rates/pay scales do not change. The merit of their technical input is valuable as is the technical input into the development of the claims.

Finally, please note that the number of copies budgeted for reports and claims are not just the number of pages submitted to the Agency. The number of copies also includes drafts, client copies, and our own copies of reports, budgets, and claims. We trust that you'll give serious weight to our requests and consider the necessity of a reimbursement budget that mirrors the way we work in actuality as does the Agency.

If you have any questions or require additional information, please contact Mr. Rob Stanley at (618) 997-2238, or me, at (217) 522-8001.

Sincerely,

Carol L. Rowe, P.G.
Senior Environmental Geologist

cx: Mr. Tom Dersch, *Dersch Energies, Inc.*
Mr. William T. Sinnott, *CW³M Company, Inc.*

Z:/Dersch - Croslow's/Stage 3/ Stage 3 Budget CL.doc

Owner/Operator and Licensed Professional Engineer/Geologist Budget Certification Form

I hereby certify that I intend to seek payment from the UST Fund for costs incurred while performing corrective action activities for Leaking UST incident 20050374. I further certify that the costs set forth in this budget are for necessary activities and are reasonable and accurate to the best of my knowledge and belief. I also certify that the costs included in this budget are not for corrective action in excess of the minimum requirements of 415 ILCS 5/57, no costs are included in this budget that are not described in the corrective action plan, and no costs exceed Subpart H: Maximum Payment Amounts, Appendix D Sample Handling and Analysis amounts, and Appendix E Personnel Titles and Rates of 35 Ill. Adm. Code 732 or 734. I further certify that costs ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 732.606 or 734.630 are not included in the budget proposal or amendment. Such ineligible costs include but are not limited to:

Costs associated with ineligible tanks.
Costs associated with site restoration (e.g., pump islands, canopies).
Costs associated with utility replacement (e.g., sewers, electrical, telephone, etc.).
Costs incurred prior to IEMA notification.
Costs associated with planned tank pulls.
Legal fees or costs.
Costs incurred prior to July 28, 1989.
Costs associated with installation of new USTs or the repair of existing USTs.

RECEIVED
JUN 11 2013
IEPA/BOL

Owner/Operator: Dersch Energies, Inc.

Authorized Representative: Tom Dersch Title: ~~Owner~~ Vice Pres

Signature: Dersch, V.P. Date: June 5, 2013

Subscribed and sworn to before me the 5th day of June, 2013.

Dorothy Dersch (Notary Public) Seal:

OFFICIAL SEAL
DOROTHY DERSCH
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES SEPT. 30, 2014

In addition, I certify under penalty of law that all activities that are the subject of this plan, budget, or report were conducted under my supervision or were conducted under the supervision of another Licensed Professional Engineer or Licensed Professional Geologist and reviewed by me; that this plan, budget, or report and all attachments were prepared under my supervision; that, to the best of my knowledge and belief, the work described in the plan, budget, or report has been completed in accordance with the Environmental Protection Act [415 ILCS 5], 35 Ill. Adm. Code 732 or 734, and generally accepted standards and practices of my profession; and that the information presented is accurate and complete. I am aware there are significant penalties for submitting false statements or representations to the Illinois EPA, including but not limited to fines, imprisonment, or both as provided in Sections 44 and 57.17 of the Environmental Protection Act [415 ILCS 5/44 and 57.17].

L.P.E./L.P.G.: Vince E. Smith, P.E. L.P.E./L.P.G. Seal:

L.P.E./L.P.G. Signature: Vince E. Smith Date: 6/11/13

Subscribed and sworn to before me the 11th day of June 2013.

(Notary Public) Seal:

OFFICIAL SEAL
CAROL L. ROWE
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 3-18-2017

The Illinois EPA is authorized to require this information under 415 ILCS 5/1. Disclosure of this information is required. Failure to do so may result in the delay or denial of any budget or payment requested hereunder.

Illinois Environmental Protection Agency

Bureau of Land • 1021 N. Grand Avenue E. • P.O. Box 19276 • Springfield • Illinois • 62794-9276

General Information for the Budget and Billing Forms

LPC #: 1010155024 County: Lawrence

City: Lawrenceville Site Name: Croslow's Shell

Site Address: 1421 Lexington Avenue

IEMA Incident No.: 20050374

IEMA Notification Date: 3/17/2005

Date this form was prepared: Aug 20, 2012

This form is being submitted as a (check one, if applicable):

- ☒ Budget Proposal
- ☐ Budget Amendment (Budget amendments must include only the costs over the previous budget.)
- ☐ Billing Package

Please provide the name(s) and date(s) of report(s) documenting the costs requested:

Name(s): _____

Date(s): _____

This package is being submitted for the site activities indicated below:

35 Ill. Adm. Code 734:

- ☐ Early Action
- ☐ Free Product Removal after Early Action
- ☒ Site Investigation . . . . . Stage 1: ☐ Actual Costs Stage 2: ☒ Proposed Stage 3: ☒ Proposed
- ☐ Corrective Action

35 Ill. Adm. Code 732:

- ☐ Early Action
- ☐ Free Product Removal after Early Action
- ☐ Site Classification
- ☐ Low Priority Corrective Action
- ☐ High Priority Corrective Action

35 Ill. Adm. Code 731:

- ☐ Site Investigation
- ☐ Corrective Action

General Information for the Budget and Billing Forms

The following address will be used as the mailing address for checks and any final determination letters regarding payment from the Fund.

Pay to the order of: Dersch Energies, Inc. / Croslow's Shell

Send in care of: CWM Company, Inc.

Address: P.O. Box 571

City: Carlinville State: IL Zip: 62626

The payee is the: Owner ☒ Operator ☐ (Check one or both.)

Signature of the owner or operator of the UST(s) (required)

W-9 must be submitted.
Click here to print off a W-9 Form.

Number of petroleum USTs in Illinois presently owned or operated by the owner or operator; any subsidiary, parent or joint stock company of the owner or operator; and any company owned by any parent, subsidiary or joint stock company of the owner or operator:

Fewer than 101: ☒ 101 or more: ☐

Number of USTs at the site: 4 (Number of USTs includes USTs presently at the site and USTs that have been removed.)

Number of incidents reported to IEMA for this site: 2

Incident Numbers assigned to the site due to releases from USTs: 20050374 2005-0374

Please list all tanks that have ever been located at the site and tanks that are presently located at the site.

Product Stored in UST	Size (gallons)	Did UST have a release?	Incident No.	Type of Release Tank Leak / Overfill / Piping Leak
Gasoline	6,000	Yes ☒ No ☐	20050374	Tank Leak
Gasoline	6,000	Yes ☒ No ☐	20050374	Tank Leak
Gasoline	6,000	Yes ☒ No ☐	20050374	Tank Leak
Diesel Fuel	1,000	Yes ☐ No ☒		
Used Oil	560	Yes ☒ No ☐	2005-0374	Tank Leak
		Yes ☐ No ☐		
		Yes ☐ No ☐		
		Yes ☐ No ☐		
		Yes ☐ No ☐		

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Budget Summary

Choose the applicable regulation: (•) 734 ( ) 732

734	Free Product	Stage 1 Site Investigation	Stage 2 Site Investigation	Stage 3 Site Investigation	Corrective Action
Drilling and Monitoring Well Costs Form	$	$	$	$ 4,013.50	$
Analytical Costs Form	$	$	$	$ 2,163.33	$
Remediation and Disposal Costs Form	$	$	$	$	$
UST Removal and Abandonment Costs Form	$	$	$	$	$
Paving, Demolition, and Well Abandonment Costs Form	$	$	$	$	$
Consulting Personnel Costs Form	$	$	$	$ 30,733.02	$
Consultant's Materials Costs Form	$	$	$	$ 1,334.60	$
Handling Charges Form	Handling charges will be determined at the time a billing package is submitted to the Illinois EPA. The amount of allowable handling charges will be determined in accordance with the Handling Charges Form.				
Total	$	$	$	$ 38,244.45	$

Drilling and Monitoring Well Costs Form

1. Drilling

Number of Borings to Be Drilled	Type HSA/PUSH/ Injection	Depth (feet) of Each Boring	Total Feet Drilled	Reason for Drilling
1	PUSH	15.00	15.00	On-site Soil Plume Delineation
1	HSA	20.00	20.00	On-site Soil and Groundwater Plume Delineation
3	HSA	20.00	60.00	Off-site Soil and Groundwater Plume Delineation

☐ Subpart H minimum payment amount applies.

	Total Feet	Rate per Foot ($)	Total Cost ($)
Total Feet via HSA:	80.00	26.91	2,152.80
Total Feet via PUSH:	15.00	21.06	315.90
Total Feet for Injection via PUSH:		17.55	
		Total Drilling Costs:	2,468.70

2. Monitoring / Recovery Wells

Number of Wells	Type of Well HSA / PUSH / 4" or 6" Recovery / 8" Recovery	Diameter of Well (inches)	Depth of Well (feet)	Total Feet of Wells to Be Installed ($)
4	HSA	2.00	20.00	80.00

Well Installation	Total Feet	Rate per Foot ($)	Total Cost ($)
Total Feet via HSA:	80.00	19.31	1,544.80
Total Feet via PUSH:		14.62	
Total Feet of 4" or 6" Recovery:		29.25	
Total Feet of 8" or Greater Recovery:		47.97	
		Total Well Costs:	1,544.80

Total Drilling and Monitoring Well Costs:	$4,013.50

Analytical Costs Form

Laboratory Analysis	Number of Samples		Cost ($) per Analysis		Total per Parameter
Chemical Analysis					
BETX Soil with MTBE EPA 8260	15	X	99.45	=	$1,491.75
BETX Water with MTBE EPA 8260	4	X	94.77	=	$379.08
COD (Chemical Oxygen Demand)		X		=	
Corrosivity		X		=	
Flash Point or Ignitability Analysis EPA 1010		X		=	
Fraction Organic Carbon Content (f_{oc}) ASTM-D 2974-00		X		=	
Fat, Oil, & Grease (FOG)		X		=	
LUST Pollutants Soil - analysis must include volatile, base/ neutral, polynuclear aromatics and metals list in Section 732. Appendix B and 734.Appendix B		X		=	
Dissolved Oxygen (DO)		X		=	
Paint Filter (Free Liquids)		X		=	
PCB / Pesticides (combination)		X		=	
PCBs		X		=	
Pesticides		X		=	
pH		X		=	
Phenol		X		=	
Polynuclear Aromatics PNA, or PAH SOIL EPA 8270		X		=	
Polynuclear Aromatics PNA, or PAH WATER EPA 8270		X		=	
Reactivity		X		=	
SVOC - Soil (Semi-Volatile Organic Compounds)		X		=	
SVOC - Water (Semi-Volatile Organic Compounds)		X		=	
TKN (Total Kjeldahl) "nitrogen"		X		=	
TPH (Total Petroleum Hydrocarbons)		X		=	
VOC (Volatile Organic Compounds) - Soil (Non-Aqueous)		X		=	
VOC (Volatile Organic Compounds) - Water		X		=	
		X		=	
		X		=	
		X		=	
		X		=	
		X		=	
Geo-Technical Analysis					
Soil Bulk Density (p_b) ASTM D2937-94		X		=	
Ex-situ Hydraulic Conductivity / Permeability		X		=	
Moisture Content (w) ASTM D2216-92 / D4643-93		X		=	
Porosity		X		=	
Rock Hydraulic Conductivity Ex-situ		X		=	
Sieve / Particle Size Analysis ASTM D422-63 / D1140-54		X		=	
Soil Classification ASTM D2488-90 / D2487-90		X		=	
Soil Particle Density (p_s) ASTM D854-92		X		=	
		X		=	
		X		=	
		X		=	

Analytical Costs Form

Metals Analysis					
Soil preparation fee for Metals TCLP Soil (one fee per soil sample)		X		=	
Soil preparation fee for Metals Total Soil (one fee per soil sample)		X		=	
Water preparation fee for Metals Water (one fee per water sample)		X		=	
Arsenic TCLP Soil		X		=	
Arsenic Total Soil		X		=	
Arsenic Water		X		=	
Barium TCLP Soil		X		=	
Barium Total Soil		X		=	
Barium Water		X		=	
Cadmium TCLP Soil		X		=	
Cadmium Total Soil		X		=	
Cadmium Water		X		=	
Chromium TCLP Soil		X		=	
Chromium Total Soil		X		=	
Chromium Water		X		=	
Cyanide TCLP Soil		X		=	
Cyanide Total Soil		X		=	
Cyanide Water		X		=	
Iron TCLP Soil		X		=	
Iron Total Soil		X		=	
Iron Water		X		=	
Lead TCLP Soil		X		=	
Lead Total Soil		X		=	
Lead Water		X		=	
Mercury TCLP Soil		X		=	
Mercury Total Soil		X		=	
Mercury Water		X		=	
Selenium TCLP Soil		X		=	
Selenium Total Soil		X		=	
Selenium Water		X		=	
Silver TCLP Soil		X		=	
Silver Total Soil		X		=	
Silver Water		X		=	
Metals TCLP Soil (a combination of all metals) RCRA		X		=	
Metals Total Soil (a combination of all metals) RCRA		X		=	
Metals Water (a combination of all metals) RCRA		X		=	
		X		=	
		X		=	
		X		=	
		X		=	
Other					
EnCore® Sampler, purge-and-trap sampler, or equivalent sampling device	15	X	11.70	=	$175.50
Sample Shipping per sampling event[1]	2	X	58.50	=	$117.00

[1]A sampling event, at a minimum, is all samples (soil and groundwater) collected in a calendar day.

Total Analytical Costs: $ 2,163.33

Consulting Personnel Costs Form

Employee Name	Personnel Title	Hours	Rate* ($)	Total Cost
Remediation Category	**Task**			
	Senior Project Manager	2.00	117.00	$234.00
Stage 3-Plan	Stage 3 Plan Review for Technical Compliance			
	Senior Prof. Engineer	2.00	152.10	$304.20
Stage 3-Plan	Stage 3 Plan Oversight & Coordination			
	Professional Geologist	4.00	107.63	$430.52
Stage 3-Plan	Stage 3 Plan Review for Design & Requisite			

Employee Name	Personnel Title	Hours	Rate* ($)	Total Cost
Remediation Category	**Task**			
	Senior Prof. Engineer	2.00	152.10	$304.20
Stage 3-Budget	Stage 3 Budget Certification			
	Senior Project Manager	8.00	117.00	$936.00
Stage 3-Budget	Stage 3 Budget / Oversight / Coordination / Technical Compliance			
	Professional Geologist	16.00	107.63	$1,722.08
Stage 3-Budget	Budget Calculations / Development			
	Senior Admin. Assistant	1.00	52.65	$52.65
Stage 3-Budget	Stage 3 Budget compilation, assembly and distribution			

Employee Name	Personnel Title	Hours	Rate* ($)	Total Cost
Remediation Category	**Task**			
	Senior Project Manager	6.00	117.00	$702.00
Stage 3-Field	Coordination / Technical Compliance / Scheduling			
	Senior Admin. Assistant	2.00	52.65	$105.30
Stage 3-Field	Office Prep., Scheduling, Arrangements for investigation			
	Professional Geologist	14.00	107.63	$1,506.82
Stage 3-Field	Off-site Drilling			
	Engineer III	14.00	117.00	$1,638.00
Stage 3-Field	Off-site Drilling Oversight			
	Professional Geologist	12.00	107.63	$1,291.56
Stage 3-Field	MW Surveying and Sampling			
	Engineer I	12.00	87.74	$1,052.88
Stage 3-Field	MW Surveying and Sampling			
	Senior Project Manager	4.00	117.00	$468.00
Stage 3-Field	Analytical Review			
	Draftperson/CAD III	6.00	58.50	$351.00
Stage 3-Field	Drafting Locations/Elevation and Contamination Levels/Drilling Prep.			
	Engineer I	6.00	87.74	$526.44
Stage 3-Field	BL and WCR Data Entry			

Employee Name	Personnel Title	Hours	Rate* ($)	Total Cost
Remediation Category	**Task**			
	Senior Project Manager	12.00	117.00	$1,404.00
Stage 3-Field	Off-site access / Drilling / Sampling coordination / Negotiation			
	Professional Geologist	16.00	107.63	$1,722.08
Stage 3-Field	Off-site results, SI Reports, Property Owner Correspondence			
	Senior Admin. Assistant	4.00	52.65	$210.60
Stage 3-Field	Office Prep., Scheduling, Arrangements for Off-site access			
	Engineer III	6.00	117.00	$702.00
Stage 3-Field	Log soil/groundwater analytical results			
	Senior Project Manager	6.00	117.00	$702.00
Stage 3-Field	Contaminant Transport Modeling / Oversight / Technical Compliance			
	Senior Prof. Geologist	16.00	128.70	$2,059.20
Stage 3-Field	Contaminant Transport Modeling			

Employee Name	Personnel Title	Hours	Rate* ($)	Total Cost
Remediation Category	**Task**			
	Senior Prof. Engineer	3.00	152.10	$456.30
SICR	SICR Certification			
	Senior Project Manager	6.00	117.00	$702.00
SICR	SICR oversight / Technical Compliance			
	Professional Geologist	45.00	107.63	$4,843.35
SICR	SICR			
	Engineer I	6.00	87.74	$526.44
SICR	SICR/Inputs			
	Senior Draftperson/CAD	16.00	70.19	$1,123.04
SICR	Drafting/Update and Complete Maps			
	Senior Admin. Assistant	4.00	52.65	$210.60
SICR	SICR Assembly/Distribution			

Employee Name	Personnel Title	Hours	Rate* ($)	Total Cost
Remediation Category	**Task**			
	Senior Prof. Engineer	4.00	152.10	$608.40
Stage 3-Pay	Stage 3 Reimbursement Certification			
	Senior Project Manager	16.00	117.00	$1,872.00
Stage 3-Pay	Stage 3 Reimbursement Oversight/Technical Compliance			
	Senior Acct. Technician	24.00	64.34	$1,544.16
Stage 3-Pay	Stage 3 Reimbursement Preparation			
	Senior Admin. Assistant	8.00	52.65	$421.20
Stage 3-Pay	Stage 3 Reimbursement Compilation, Assembly and Distribution			

*Refer to the applicable Maximum Payment Amounts document.

Total of Consulting Personnel Costs	$30,733.02

Consultant's Materials Costs Form

Materials, Equipment, or Field Purchase	Time or Amount Used	Rate ($)	Unit	Total Cost
Remediation Category	**Description/Justification**			
PID Rental	1.00	129.00	/day	$129.00
Stage 3-Field	To detect VOC levels in soil samples			
Survey Equipment Rental	1.00	75.00	/day	$75.00
Stage 3-Field	Survey monitor well elevations for groundwater flow calculations			
Water Level Indicator	2.00	21.00	/day	$42.00
Stage 3-Field	Test for groundwater during drilling activities/Measure static groundwater elevations			
Measuring Wheel	1.00	18.00	/day	$18.00
Stage 3-Field	Mapping sampling locations			
Mileage	620.00	.58	/mile	$359.60
Stage 3-Field	Two round trips from Springfield Office (1-Drilling, 1-Groundwater Sampling)			
Disposable Gloves	2.00	13.00	/box	$26.00
Stage 3-Field	Disposable gloves for soil and groundwater sampling			
Bailers	4.00	13.00	/each	$52.00
Stage 3-Field	Disposable bailers for monitoring well development and sampling			
Bailing Twine	1.00	5.00	/roll	$5.00
Stage 3-Field	String for Bailers			
Copies	200.00	.10	/each	$20.00
Stage 3-Field	Field/Plan/Maps/Borelogs/Analytical/Off-site			

Materials, Equipment, or Field Purchase	Time or Amount Used	Rate ($)	Unit	Total Cost
Remediation Category	**Description/Justification**			
Per diem	2.00	39.00	/each	$78.00
Stage 3-Field	Per diem for drilling /sampling activities			
Hotel	2.00	80.00	/each	$160.00
Stage 3-Field	Hotel stay for drilling /sampling activities			
Copies	250.00	.10	/each	$25.00
Stage 3-Budget	Copies of Budget / Draft / Final / Attachments / Forms			
Postage	2.00	5.00	/each	$10.00
Stage 3-Budget	Budget / Forms Distribution			
Copies	800.00	.10	/each	$80.00
Stage 3-Pay	Copies of Reimbursement Claim			
Postage	3.00	5.00	/each	$15.00
Stage 3-Pay	Distribution of Reimbursement Claim & Client correspondence forms			
Copies	1,000.00	.10	/each	$100.00
SICR	Copies of Report / Draft / Final / Attachments / Forms			
Postage	2.00	5.00	/each	$10.00
SICR	Report / Forms Distribution			
Copies	300.00	.10	/each	$30.00
Stage 3-Field	Off-site access requests / correspondences / reports			

Materials, Equipment, or Field Purchase		Time or Amount Used	Rate ($)	Unit	Total Cost
Remediation Category	**Description/Justification**				
Postage		20.00	5.00	/each	$100.00
Stage 3-Field	Off-site access requests / correspondences / reports / results / status				

Total of Consultant Materials Costs	**$1,334.60**

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829
PAT QUINN, GOVERNOR LISA BONNETT, DIRECTOR

217/524-3300

CERTIFIED MAIL

7011 1150 0001 0862 5149

JUL 30 2013

Dersch Energies, Inc.
Mr. Tom Dersch
P.O. Box 217
Mt. Carmel, Illinois 62863

EPA-DIVISION OF RECORDS MANAGEMENT
2013
REVIEWER JKS

Re: LPC #1010155024—Lawrence County
Lawrenceville/ Croslow's Shell
1421 Lexington Avenue
Leaking UST Incident No. 20050374
Leaking UST Technical File

Dear Mr. Dersch:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the Stage 2 and 3 Site Investigation Plan Budget (budget) submitted for the above-referenced incident. This budget, dated June 11, 2013, was received by the Illinois EPA on June 11, 2013. Citations in this letter are from the Environmental Protection Act (Act), as amended by Public Act 92-0554 on June 24, 2002, and Public Act 96-0908 on June 8, 2010, and 35 Illinois Administrative Code (35 Ill. Adm. Code).

The proposed budget for Stage(s) 2 & 3 is approved for amounts determined in accordance with Subpart H, Appendix D, and Appendix E of 35 Ill. Adm. Code 734 (35 Ill. Adm. Code 734.310(b)). Costs must be incurred in accordance with the approved plan. Please be advised that costs associated with materials, activities, and services must be reasonable, must be consistent with the associated technical plan, must be incurred in the performance of corrective action activities, must not be used for corrective action activities in excess of those necessary to meet the minimum requirements of the Act and regulations, and must not exceed the maximum payment amounts set forth in Subpart H, Appendix D, and Appendix E of Part 734 (Section 57.7(c) of the Act and 35 Ill. Adm. Code 734.510(b)).

NOTE: Pursuant to Section 57.8(a)(5) of the Act, if payment from the Fund will be sought for any additional costs that may be incurred as a result of the Illinois EPA's modifications, an amended budget must be submitted. Amended plans and/or budgets must be submitted and approved prior to the issuance of a No Further Remediation (NFR) Letter. Costs associated with a plan or budget that have not been approved prior to the issuance of an NFR Letter will not be paid from the Fund.

Further, pursuant to 35 Ill. Adm. Code 734.145, it is required that the Illinois EPA be notified of field activities prior to the date the field activities take place. This notice must include a description of the field activities to be conducted; the name of the person conducting the activities; and the date, time, and place the activities will be conducted. *Include additional required information, if any.* This notification of field activities may be done by telephone, facsimile, or electronic mail—and must be provided at least three (3)

PETITIONER'S EXHIBIT D

working days prior to the scheduled field activities. In addition to providing at least three days' notice to Leaking UST Section staff in Springfield, notification must be provided to Rob Mileur either by telephone at (618) 993-7223 or by e-mail at Robert.Mileur@illinois.gov.

Please be advised that Senate Bill 20/Public Act 98-109, which became effective July 25, 2013, requires that certain corrective action activities include a Project Labor Agreement (PLA) if payment of costs is requested from the UST Fund. Visit the Leaking UST Program Web page at www.epa.state.il.us/land/lust for information about Senate Bill 20, the fact sheet, and the PLA Certification. For corrective action activities that require a PLA, a complete application for payment from the UST Fund must contain a PLA Certification in order for payment from the UST Fund to be approved.

Pursuant to Sections 57.7(a)(5) and 57.12(c) and (d) of the Act and 35 Ill. Adm. Code 734.100 and 734.125, the Illinois EPA requires submittal of a Site Investigation Completion Report within 30 days after completing the site investigation to:

Illinois Environmental Protection Agency
Bureau of Land - #24
Leaking Underground Storage Tank Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794-9276

Please submit all correspondence in duplicate and include the Re: block shown at the beginning of this letter.

If you have any questions or need further assistance, please contact Brad Dilbaitis at (217) 785-8378 or at Bradley.Dilbaitis@illinois.gov.

Sincerely,

Thomas A. Henninger
Unit Manager
Leaking Underground Storage Tank Section
Division of Remediation Management
Bureau of Land

TAH:BD\BUD2&3app.docx

c: CWM Company
BOL File

CW³M Company
Environmental Consulting Services

701 W. South Grand Avenue
Springfield, IL 62704

Phone: (217) 522-8001
Fax: (217) 522-8009

1010155024– Lawrence County
Dersch Croslow's Shell
Incident # 20050374
Leaking UST Technical File

May 18, 2015

Mr. Brad Dilbaitis, Project Manager
LUST Section, Bureau of Land
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

RE: LPC # 1010155024—Lawrence County
Dersch Croslow's / Lawrenceville
1421 Lexington Avenue
Incident Number: 2005-0374
LUST Technical Reports—Site Investigation Completion Report

Dear Mr. Dilbaitis:

On behalf of Mr. Tom Dersch, Vice President of Dersch Energies, Inc., which owns the USTs at the above referenced site, we are submitting the attached Site Investigation Completion Report (SICR). This includes the results of Stage 3 as well as a summary of costs. The proposed budget includes the work performed by both consultants who contributed efforts to the Stage 2/3 Investigation; Applied Environmental Technologies and CW³M Company.

CW³M Company works in a similar structure as the Agency. Numerous personnel are involved with various components, i.e. phase review and approval of plans, budgets, reimbursements, and correspondence. In our opinion, this is a highly efficient work plan that limits mistakes, keeps costs down, and ensures quality work. Please note multiple personnel are listed for the completion of certain tasks. Some reviewers have mistakenly interpreted this as an error or duplication; it is not. The method for calculating personnel time in the proposed budget has been approved by the Agency in other incidents, such as, incident numbers 2007-1408, 2008-1202, 2008-1657, 2008-1543, 2009-1270, 2009-0929, 2011-0837, 2011-0822, 2012-1125, and 2013-0876. These hours have been found reasonable and justified as an estimate for the work proposal. These hours should be deemed reasonable as more than one person is required to develop plans and budgets and to check for accuracy of the plan, budget, bore logs, reimbursement claims, and analytical, which is needed to finalize the plan and budget. This is no different than the Agency's review process, which includes project managers, unit managers, fiscal reviewers, etc. Multiple personnel touch each letter or plan with different individual tasks on assignments. Many plans and budgets are even taken to committees.

Past conversations with managers have taken place to clarify and satisfy personnel in the budgets and reimbursements. Some Agency reviewers have been cutting budget and reimbursement line items for technical personnel. Similar to the Agency, technical personnel are required to prepare and review reimbursement claims. Some plans span over several years, include multiple drilling events, and have multiple personnel involved. With such complexity, technical personnel familiar with the project are required to work with the accounting technicians to develop reimbursement claims. As your technical personnel should be well familiar, there are many technical components to the reimbursement side of the equation. It is not all just accounting. Currently, the Agency has technical staff involved with the review of claims; their billing rates/pay scales do not change. The merit of their technical input is valuable as is the technical input into the development of the claims.

Finally, please note that the number of copies budgeted for reports and claims are not just the number of pages submitted to the Agency. The number of copies also includes drafts, client copies, and our own copies of reports, budgets, and claims. We trust that you'll give serious weight to our requests and consider the necessity of a reimbursement budget that mirrors the way we work in actuality as does the Agency.

If you have any questions or require additional information, please contact Mr. Rob Stanley at (618) 997-2238, or me at (217) 522-8001.

Sincerely,

Carol L. Rowe, P.G.
Senior Environmental Geologist

xc: Mr. Tom Dersch, Dersch Energies, Inc.
Mr. William T. Sinnott, CW^{3}M Company, Inc.

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SITE INVESTIGATION COMPLETION REPORT

DERSCH CROSLOW'S

Lawrenceville, Illinois
LPC #1010155024 — Lawrence County
Incident Number 2005-0374

Submitted to:

Illinois Environmental Protection Agency
Leaking Underground Storage Tank Section, Bureau of Land
1021 North Grand Avenue East
Springfield, Illinois

Prepared By:

CW³M COMPANY, INC.

701 West South Grand Ave.
Springfield, Illinois
(217) 522-8001

400 West Jackson St., Suite C
Marion, Illinois
(618) 997-2238

MAY 2015

CONTENTS

APPENDICES

TABLES

ACRONYMS AND ABBREVIATIONS

AET	Applied Environmental Technologies, Inc.
BETX	benzene, ethylbenzene, toluene and total xylenes
CAP	Corrective Action Plan
CUOs	Clean-up Objectives
CW³M	CW³M Company, Inc
Ill. Adm. Code	Illinois Administrative Code
IEMA	Illinois Emergency Management Agency
IEPA	Illinois Environmental Protection Agency
ISGS	Illinois State Geological Survey
ISWS	Illinois State Water Survey
L	Liter
LUST	Leaking Underground Storage Tank
mg/kg	Milligrams per kilogram (parts per million)
mg/L	Milligrams per liter
mL	Milliliters
MTBE	Methyl tert-butyl ether
MW	Monitoring Well
PID	Photoionization detector
PNAs	Polynuclear Aromatics
PVC	Polyvinyl Chloride
OSFM	Office of the State Fire Marshal
SIP	Site Investigation Plan
SICR	Site Investigation Completion Report
TACO	Tiered Approach to Corrective Action Objectives
USTs	Underground Storage Tanks
WCRs	Well Completion Reports

1. SITE HISTORY/EXECUTIVE SUMMARY

1.1 GENERAL

Mr. Tom Dersch, Vice President of Dersch Energies, Inc. which owns the underground storage tanks (USTs) at the Dersch Croslow's facility, reported a release to the Illinois Emergency Management Agency (IEMA) following an environmental assessment. Incident Number 2005-0374 was assigned on March 17, 2005. During the site investigation phase of the incident, Mr. Dersch has retained CW³M Company, Inc. (CW³M) to proceed with the reporting in accordance with 35 Illinois Administrative Code (Ill. Adm. Code) § 734.

A 20-Day Certification was submitted to the Illinois Environmental Protection Agency (IEPA) on March 31, 2005 by Applied Environmental Technologies, Inc. (AET) (AET, 2005a). A 45-Day Report was submitted to the IEPA on April 28, 2005 (AET, 2005b). A Stage 1 Site Investigation Plan (SIP) was submitted on February 27, 2007 (AET, 2007a) and was approved with modifications to the budget on April 17, 2007 (IEPA, 2007a). The Stage 2/3 SIP was also submitted on February 27, 2007 (AET, 2007b) and was approved on April 17, 2007 by the IEPA (IEPA, 2007b). However, a budget for the Stage 2/3 site investigation was never submitted for review. When CW³M begin working on the project, a Stage 2/3 Budget was submitted to the IEPA on June 11, 2013 (CW³M, 2013) and was approved on July 30, 2013 (IEPA, 2013).

This Site Investigation Completion Report (SICR) has been prepared by CW³M in accordance with the requirements of 35 Ill. Adm. Code § 734. The Site Investigation Completion Report form, which has been prescribed and provided by the IEPA, has been included herein as Appendix A. The Stage 3 actual costs and certification are included herein as Appendix F. This report is certified by an Illinois Licensed Professional Engineer. The geological investigation and site investigation was performed under the direction of an Illinois Licensed Professional Geologist and completed in accordance with the Professional Geologist Licensing Act and its Rules for Administration.

1.2 SITE LOCATION

The site, known as Dersch Croslow's is located at 1421 Lexington Avenue, Lawrenceville, Lawrence County, Illinois. The site is located in the SE ¼ of the NE ¼ of the NE ¼ of Section 1, Township 3 North of the Centralia Baseline and Range 12 West of the Second Principal Meridian.

1.3 UNDERGROUND STORAGE TANK INFORMATION

Dersch Energies, Inc. personnel and AET representatives were at the site on May 5, 2005 to remove the USTs at the Dersch Croslow's site. A permit for the removal of the USTs and product piping was approved by the Illinois Office of the State Fire Marshal (OSFM) on April 4, 2005 (OSFM, 2005). Under the supervision of an OSFM Tank Specialist, the tanks were removed.

Table 1-1. Underground Storage Tank Summary

Tank Number	Tank Volume (gallons)	Tank Contents	Incident Number	Release Information	Current Status
1	6,000	Gasoline	05-0374	Leak	Removed 5/5/2005
2	6,000	Gasoline	05-0374	Leak	Removed 5/5/2005
3	6,000	Gasoline	05-0374	Leak	Removed 5/5/2005
4	1,000	Diesel	05-0374	Leak	Removed 5/5/2005
5	560	Used Oil	98-1496	Leak	Removed 6/22/98

1.4 EARLY ACTION SUMMARY

Four underground storage tanks were removed on May 5, 2005. Approximately 443 tons of hydrocarbon impacted backfill were excavated and properly disposed of in conjunction with the removal of the USTs. Dersch Enterprises, Inc. requested that AET proceed with reporting requirements in accordance with 35 Ill Adm. Code § 734. AET personnel, following IEPA guidelines, appropriately collected soil samples from the excavation walls, floors, and below pump dispensers in order to fully determine the extent of impacted soils from the release of product associated with this incident. All samples were collected and analyzed for benzene, ethyl-benzene, toluene, and total xylenes (BETX), methyl tert-butyl ether (MTBE), and poly-nuclear aromatics (PNAs). A summary of analytical results can be found in Appendix E. The excavation was backfilled with clean soil and no free product was encountered during early action. Hydrocarbon impacted soils were properly disposed of in the Lawrence County Regional Landfill and a groundwater hydrocarbon impact investigation was deemed

necessary as hydrocarbon impact was believed to have been in contact with the groundwater table.

2. SITE CHARACTERIZATION

2.1 NATURE AND QUANTITY OF RELEASE

On May 5, 2005, an OSFM Tank Specialist was at the site to oversee the tank removal activities conducted and coordinated by AET. Removal of the tanks at the site confirmed the release and the factors that contributed to the release. The quantity of the release is unknown. Early action excavation samples were collected and confirmed that hydrocarbon impact had migrated beyond the backfill materials into the surrounding native soil.

2.2 CURRENT AND PROJECTED POST-REMEDIATION USES

The site is surrounded by commercial and residential properties. The site existed as a former Shell Service and Fueling station but since has existed as an active automotive repair facility.

2.3 WATER QUALITY

According to the Illinois Pollution Control Board, three Class III Groundwater contributing areas exist; however, they are located in McHenry, Monroe, and St. Clair Counties in northern and western Illinois. Therefore, CW³M will consider the groundwater at this site to be Class I unless demonstrated otherwise pursuant to 35 Ill. Adm. Code § 620.210.

2.4 WELL DATA

A survey of water supply wells for the purpose of identifying and locating all community water supply wells within 2,500 feet of the UST systems and all potable water supply wells within 200 feet of the UST systems has been completed. The Illinois State Water Survey (ISWS), the Illinois State Geological Survey (ISGS) and the IEPA Division of Public Water Supplies were contacted via Source Water Assessment Program online.

The ISGS, ISWS, and IEPA Division of Public Water Supplies were accessed online on April 25, 2014 (EPA.STATE.IL.US, 2014). The response indicated that seven wells were located within 2,500 feet of the site and no wells are within the designated set back zone. Also, the response stated that there are no community water supply wells located within 2,500 feet of the site. A groundwater ordinance exists within the city of Lawrenceville but the Dersch Croslow's site does not fall within the boundary of the ordinance. The table below provides information on all wells within 2,500' of the Dersch Croslow's site.

Table 2-1. Water Supply Well Information

Well ID	Type	Depth of Well *(feet)*	Distance From USTs *(feet)*	Setback Zone *(feet)*
28262	ISGS	30	1,848	200
30108	ISGS	140	1,795	200
06905	ISGS	180	2,218	200
07275	ISGS	49	2,270	200
30995	ISGS	49	2,270	200
30996	ISGS	44	2,270	200
31542	ISGS	220	2,429	200

2.5 PHYSICAL SETTING

The physical setting including environmental, geologic, hydrogeologic, hydrologic, geographic, and topographic conditions has been described in the 45-Day Report (AET, 2005b). Additionally, this information is supplemented by the boring logs from the Stage 2 and Stage 3 investigations which are included in Appendix D of this report.

3. SITE INVESTIGATION

3.1 DRILLING METHOD

Five-foot continuous samplers were used to advance and characterize each boring. This method was selected to minimize the likelihood of gaps in the sample column. Augers were decontaminated with a pressure steam wash between borings to prevent cross-hydrocarbon impact. Soil boring logs were prepared for all soil borings.

3.2 SOIL SAMPLING PROTOCOL

All samples were collected utilizing proper sampling protocol. Samplers wore new, disposable, latex gloves for each sampling event. Samples were collected at the center of each 5-foot sample core, unless conditions within the soil units warranted otherwise by odor or visual hydrocarbon impact. Each of the samples from the continuous sampler was screened using a photoionization detector (PID) and was placed in the appropriate laboratory-provided sampling container for laboratory analysis of BETX, MTBE, and PNAs. Proper sampling, decontamination and chain-of-custody procedures were employed. The sample containers were filled, labeled, and kept cool (to 6° C or below) until shipment to the laboratory. Sample descriptions were recorded on the boring log prepared for each boring. The soil hydrocarbon impact plume for PNA contaminants was defined at the conclusion of early action sampling. All floor and wall samples collected from the UST excavation pit confirmed no hydrocarbon impact existed above the most stringent Tier 1 CUOs for all PNA constituents. Appendix E includes a summary of all analytical results during the course of the site investigation and shows no PNA hydrocarbon impact above the most stringent Tier 1 Clean-up Objectives (CUOs).

All soil samples were analyzed by an accredited laboratory using test methods identified under 35 Ill. Adm. Code 186.180. As required by the leaking underground storage tank (LUST) Section, a Laboratory Certification for Chemical accompanies each of the sample results that have been reported.

3.3 MONITORING WELL INSTALLATION PROTOCOL

Two-inch diameter wells consist of a 10-foot polyvinyl chloride (PVC) screen and PVC riser above the well screen. Annular space around the wells is filled with coarse-grained, 20/20 sand. Each well was completed at the surface with a flush-mount manway and a locking protective cover. The manways were slightly elevated and the concrete sloped away from each well to prevent surface water run-in. The elevations of

the manways were surveyed to the nearest 0.01 foot. Well screens were set to the center depth of groundwater encountered during drilling to accommodate seasonal fluctuation of the water table.

Monitoring wells (MWs) were cleared of foreign sediment by standard well-development procedures in order to restore the natural hydraulic conductivity of the formation and to reduce the turbidity of the groundwater samples. All wells were developed by surging the bailer back and forth for several minutes and then withdrawing groundwater. The development process continued until clear water flowed into each well. The purpose of the surging was to remove the undersize sediment from the well and filter pack. All wells were developed the day of installation.

3.4 GROUNDWATER SAMPLING PROTOCOL

All samples were collected utilizing proper sampling protocol. Samplers wore clean, disposable latex gloves, which were changed between each sample. The water level in each newly installed well was measured prior to sampling to determine the direction of the flow of groundwater. Prior to sampling, the water above the well screen is extracted from each well utilizing clean, disposable bailers to purge the well of its contents and collect a fresh sample of groundwater as it flows into the well.

Groundwater samples were gently poured into 40 milliliter (mL) glass vials for BETX and MTBE then placed in a cooler with ice for transport. The samples are placed in coolers with ice for delivery or shipment to the laboratory. Proper chain-of-custody procedures were followed. Each sample was labeled immediately upon collection and logged onto the chain-of-custody form. The chain-of-custody form was transported with the samples and then relinquished to the laboratory. The data collected was used to determine the groundwater flow directions and whether the applicable groundwater quality standards are exceeded. Note, the groundwater hydrocarbon impact plume for PNA contaminants was defined at the conclusion of Stage 1 groundwater sampling. Appendix E includes a summary of all analytical results during the course of the site investigation and shows PNA hydrocarbon impact above the most stringent Tier 1 CUOs for monitoring well MW-5. Due to the location of MW-5 at the center of the site however, the hydrocarbon impact plume relative to PNA hydrocarbon impact was defined by the monitoring wells located on the property boundaries. The Stage 2/3 Site Investigation Plan was approved without any sampling of PNA constituents in the proposed groundwater investigation (AET, 2007b).

3.5 DESCRIPTION OF ACTIVITIES COMPLETED

3.5.1 First Round of Sampling

On October 17, 2006 Stage 1 Site Investigation activities were initiated by AET personnel. Ten borings were completed in an attempt to define the hydrocarbon impact plume on site and five of the boring locations were completed as monitoring wells in an attempt to define the groundwater hydrocarbon impact plume. Soil samples were continuously collected from every five foot interval from the borings and analyzed for BETX and MTBE constituents as PNA hydrocarbon impact was defined at the conclusion of early action activities. However, groundwater was impacted by the release of petroleum products so groundwater samples were collected and analyzed for BETX, MTBE, and PNA constituents during stage 1 investigation activities. Analytical results confirmed hydrocarbon impact for both soil and groundwater above the most stringent Tier 1 CUO's. Soil boring logs and well completion reports (WCRs) are included in Appendix D. A summary of the analytical results is included in Appendix E.

AET personnel returned to the site on October 24, 2006 to conduct a slug test to determine the site-specific hydraulic conductivity for the soil on site. The hydraulic conductivity determined by AET analysis of the Bower-Rice Method yielded results of 7.6718 x 10^-5 cm/sec (AET, 2007b).

3.5.2 Second Round of Sampling

Following AET's Stage 2/3 Drill Plan, CW³M personnel were on site March 27, 2014 to initiate off-site drilling activities. A total of five soil borings were advanced in an attempt to define the soil hydrocarbon impact plume off-site. Soil samples were collected and analyzed for BETX and MTBE. Four of the soil borings were advanced as monitoring wells in an attempt to define the groundwater hydrocarbon impact plume. The analytical results indicate that the soil plume has been defined on and off site. Soil boring logs and WCRs are included in Appendix D. A summary of the analytical results is included in Appendix E. In an effort to clarify any potential misunderstanding, it is important to note that the approved Stage 2/3 Plan was slightly altered due to conditions in the field observed by CW³M personnel. Although the approved Stage 2/3 Plan (AET, 2007b) and the subsequent Stage 2/3 Budget (CW³M, 2013) were approved, monitoring well installation to a depth of 20 feet and soil sample collection to the 15-foot interval, CW³M ceased well installation at a depth of 15 feet. The groundwater table was encountered at a depth between 9-11' and installation of monitoring wells to a depth of 20' seemed excessive while also placing the 10' screening portion of the well below a depth that would intercept the top portion of the

groundwater table. However, a sample was collected from the middle portion of the 10-15' soil depth in an effort to fully define the soil hydrocarbon impact plume in the vertical direction and remain consistent with the correspondence of the IEPA project manager (IEPA, 2007b) (IEPA, 2013). Although it is understood that a sample collected below the groundwater table is atypical unless approved by the Agency as in this plan, both the Stage 2/3 Plan and Budget were approved to sample at this depth so CW³M personnel collected a sample at the 12.5' depth to remain consistent with prior investigations conducted by AET. Also, AET recorded groundwater at a depth of 9' in previous drilling events, collected soil samples at a depth of 12.5' to define the vertical extent of the hydrocarbon impact plume which is below the groundwater table, and set a well at a depth of 20'. Again, while atypical, AET and Agency had their reasons for vertical extent definition, the work already conducted and proposed was approved in like manners; thus, CW³M attempted to follow the approved plan and sampling intervals to the best of our ability while installing the wells at appropriate depth groundwater was encountered in the field.

3.5.3 Hydraulic Conductivity Testing

In accordance with 35 Ill. Adm. Code 734, remediation objectives were determined in accordance with 35 Ill. Adm. Code 742. The site specific physical parameters have been determined, and are calculated below.

Hydraulic Conductivity (K), 7.6718 x 10^{-5} cm/sec
Soil bulk density (ρ_b), 2.089 g/cm^3
Soil particle density (ρ_s), 2.66 g/cm^3
Moisture content (w), 0.25
Organic carbon content (f_{oc}), 0.003 g/g

A hydraulic conductivity test was performed on the 6' depth sample at B-2 collected during stage 1 site investigation activities. The results of the slug test were included in Stage 2/3 SIP (AET, 2007b), and the hydraulic conductivity presented above is the field determined value. Velocity was calculated using the hydraulic conductivity results determined at the site, as well as the hydraulic gradient. The hydraulic gradient of 0.034 was found by calculating the change in gradient between the most up-gradient well (MW-8, 98.27 feet) and the most down-gradient well in the direction of flow (MW-1, 91.73 feet), then dividing this answer by the distance in feet between the two wells (192.2 feet). Formula R24, ($U_{gw} = K \bullet i$) of 35 Ill. Adm. Code § 742 Appendix C, Table C. The resulting velocity is 2.611 x 10^{-7} cm/sec.

4. DEVELOPMENT OF REMEDIATION OBJECTIVES

4.1 GROUNDWATER REMEDIATION OBJECTIVES

CW³M will consider the groundwater at this site to be Class I unless demonstrated otherwise pursuant to 35 Ill. Adm. Code § 620.210. According to the Illinois Pollution Control Board, three Class III Groundwater contributing areas exist; however, they are located in McHenry, Monroe and St. Clair Counties in northern and western Illinois.

Groundwater investigation sample results would be compared to the Tiered Approach to Corrective Objectives (TACO) Residential Tier 1 Clean-up Objectives in milligrams per liter (mg/L). PNA parameters have been listed for comparison of Stage 1 groundwater samples which were collected and analyzed for PNA contaminants.

Table 4-1. Groundwater Remediation Objectives

Parameter	TACO Residential Tier 1 Clean-up Objective (mg/L)
Benzene	0.005
Ethylbenzene	0.7
Toluene	1.0
Total Xylenes	10.0
MTBE	0.07
Acenaphthene	570.0
Acenaphtylene	15.0
Anthracene	12,000.0
Benzo(a)anthracene	0.9
Benzo(a)pyrene	0.09
Benzo(b)fluoranthene	0.9
Benzo(g,h,i)perylene	2,300.0
Benzo(k)fluoranthene	9.0
Chrysene	88.0
Dibenz(a,h)anthracene	0.09
Fluoranthene	4,300.0
Fluorene	560.0
Indeno(1,2,3-cd)pyrene	0.9
Naphthalene	1.8
Phenanthrene	140.0
Pyrene	2,300.0

4.2 SOIL REMEDIATION OBJECTIVES

Soil analytical results were compared to the TACO Residential Tier 1 Clean-up Objectives in milligrams per kilogram (parts per million) (mg/kg). PNA parameters have been listed for comparison of Early Action samples which were collected and analyzed for PNA contaminants.

Table 4-2. Soil Remediation Objectives

Parameter	TACO Residential Tier 1 Clean-up Objective (mg/kg)
Benzene	0.03
Ethylbenzene	13.0
Toluene	12.0
Total Xylenes	5.6
MTBE	0.32
Acenaphthene	570.0
Acenaphtylene	15.0
Anthracene	12000.0
Benzo(a)anthracene	0.9
Benzo(a)pyrene	0.09
Benzo(b)fluoranthene	0.09
Benzo(g,h,i)perylene	2300.0
Benzo(k)fluoranthene	9.0
Chrysene	88.0
Dibenz(a,h)anthracene	0.09
Fluoranthene	4300.0
Fluorene	560.0
Indeno(1,2,3-cd)pyrene	0.9
Naphthalene	1.8
Phenanthrene	140.0
Pyrene	2300.0

5. ANALYTICAL OBJECTIVES AND RESULTS

5.1 SOIL ANALYTICAL RESULTS

Tables comparing the site investigation analytical results to the most stringent Tier 1 Remediation Objectives are included with the analytical results in Appendix E. The soil plume is defined horizontally and vertically on and off site.

5.2 GROUNDWATER ANALYTICAL RESULTS

Tables comparing the site investigation analytical results to the most stringent Tier 1 Remediation Objectives are included with the analytical results in Appendix E. The groundwater plume is defined on and off-site.

5.3 GROUNDWATER FLOW DIRECTION

Based upon measurements taken during a visit to the site on April 4, 2014, the groundwater flow direction is generally toward the east. Although generally from west to east, groundwater elevation readings show low points at MW-3 and MW-1. A map of the groundwater elevations can be found in Appendix B.

6. SITE MAPS

Site maps identifying the UST systems, excavations and sample locations, product and dispenser lines, pumps and pump islands, underground utilities, nearby structures, property boundaries, and any surrounding areas that might have been adversely affected by the release of petroleum from the UST systems are included in Appendix B. All maps are to scale, oriented north and are prepared in accordance with 35 Ill. Adm. Code 734.440.

7. CONCLUSIONS AND RECOMMENDATIONS

7.1 CONCLUSIONS

Soil analytical results indicate that the Clean-Up Objectives for the site have been exceeded and are not contained within the property boundaries. Hydrocarbon impact is located in the southern portion of the site near the pump island. Indicator contaminants have exceeded the objectives of all BETX contaminants. Based on site investigations, the soil plume has been defined.

Groundwater analytical results indicate that the Clean-Up Objectives for the site have been exceeded and are not contained within the property boundary. Hydrocarbon impact is located on the northern property line and the eastern property line. Both locations along the property line were investigated during Stage 3 activities and defined off site. Indicator contaminants have exceeded the objectives for Toluene. Based on the site investigations, the groundwater plume has been defined.

7.2 RECOMMENDATIONS

The results of the site investigation confirm that the extent of hydrocarbon impact has been defined. On behalf of Mr. Tom Dersch, owner of USTs at the site, CW³M will develop a Corrective Action Plan (CAP) and Budget for submittal to the IEPA based upon the hydrocarbon impact plumes that have been defined in this report.

The CAP will address recently adopted rules on Vapor Intrusion; screening parameters will be evaluated for the potential presence and impact of vapor. If necessary, a Vapor Intrusion Investigation will be proposed.

8. REFERENCES

AET, 2005a. Applied Environmental Technologies, Inc., *20-Day Certification,* Dersch Croslow's, Lawrenceville, Illinois, March 31, 2005.

AET, 2005b. Applied Environmental Technologies, Inc., *45-Day Report,* Dersch Croslow's, Lawrenceville, Illinois, April 28, 2005.

AET, 2007a. Applied Environmental Technologies, Inc., *Stage 1 Site Investigation Plan and Budget,* Dersch Croslow's, Lawrenceville, Illinois, February 27, 2007.

AET, 2007b. Applied Environmental Technologies, Inc., *Stage 2/3 Site Investigation Plan,* Dersch Croslow's, Lawrenceville, Illinois, February 27, 2007.

CW³M, 2013. CW³M Company, Inc., *Stage 2/3 Site Investigation Budget,* Dersch Croslow's, Lawrenceville, Illinois, June 11, 2013.

IEPA, 2007a. Illinois Environmental Protection Agency, *Stage 1 Site Investigation Plan and Budget Correspondence,* Dersch Croslow's, Lawrenceville, Illinois, April 17, 2007.

IEPA, 2007b. Illinois Environmental Protection Agency, *Stage 2/3 Site Investigation Plan Correspondence,* Dersch Croslow's, Lawrenceville, Illinois, April 17, 2007.

IEPA, 2013. Illinois Environmental Protection Agency, *Stage 2/3 Site Investigation Budget Correspondence,* Dersch Croslow's, Lawrenceville, Illinois, July 30, 2013.

EPA.STATE.IL.US, 2014. Source Water Assessment Program, *Water Well Survey Map* *www.maps.epa.state.il.us*, accessed April 25, 2014.

OSFM, 2005. Dersch Energies, Inc., Permit for Removal, Dersch Croslow's, Lawrenceville, Illinois, April 4, 2005.

APPENDIX A

SITE INVESTIGATION COMPLETION REPORT FORM

SITE INVESTIGATION COMPLETION REPORT
DERSCH CROSLOWS
LAWRENCEVILLE, ILLINOIS

Illinois Environmental Protection Agency

Bureau of Air • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

Leaking Underground Storage Tank Program
Site Investigation Completion Report

A. Site Identification

IEMA Incident # (6- or 8-digit): 20050374 IEPA LPC # (10-digit): 1010155024

Site Name: Dersch Croslow's Shell

Site Address (not a P.O. Box): 1421 Lexington Avenue

City: Lawrenceville County: Lawrence Zip Code: 62439

B. Site Information

1. Will the owner or operator seek payment from the Underground Storage? ☒ Yes ☐ No
2. Has a Site Investigation Plan been approved? ☒ Yes ☐ No

Date(s) of approval letter(s): Apr 17, 2007

C. Site Investigation Results

Provide the following:

1. Site history with respect to the release;
2. Site description:
   a. Area surrounding the site;
   b. Local geology, hydrogeology, and hydrology;
   c. Local geography and topography;
   d. Existing and potential migration pathways and exposure routes; and
   e. Current and projected post-remediation land use;
3. Site investigation results:
   a. Map(s) showing locations of all borings and groundwater monitoring wells completed as part of site investigation and the groundwater flow direction;
   b. Map(s) showing the horizontal extent of soil and groundwater contamination exceeding the most stringent Tier 1 remediation objectives (ROs);
   c. Map cross-section(s) showing the horizontal and vertical extents of soil and groundwater contamination exceeding the most stringent Tier 1 ROs;
   d. Soil boring logs and monitoring well construction diagrams for all borings drilled and groundwater monitoring wells installed as part of site investigation;
   e. Analytical results, chain of custody forms, and laboratory certifications;
   f. Table comparing analytical results to the most stringent Tier 1 ROs (include sample depth, date collected, and detection limits); and
   g. Potable water supply well survey;

4. Conclusion that includes an assessment of the sufficiency of the data;

5. Site map(s) meeting the requirements of 35 Ill. Adm. Code 734.440; and

6. Budget forms of actual costs (documenting actual work performed during the previous stage).

D. Signatures

All plans, budgets, and reports must be signed by the owner or operator and list the owner's or operator's full name, address, and telephone number.

UST Owner or Operator

Name: Dersch Energies, Inc.
Contact: Tom Dersch
Address: P.O. Box 217
City: Mt. Carmel
State: Illinois
Zip Code: 62863
Phone: (618) 262-5181
Signature:
Date: 5-11-2015

Consultant

Company: CWM Company, Inc.
Contact: Carol Rowe
Address: 701 South Grand Avenue West
City: Springfield
State: Illinois
Zip Code: 62704
Phone: (217) 522-8001
E-mail: CWM@cwmcompany.com
Signature:
Date: 5/18/2015

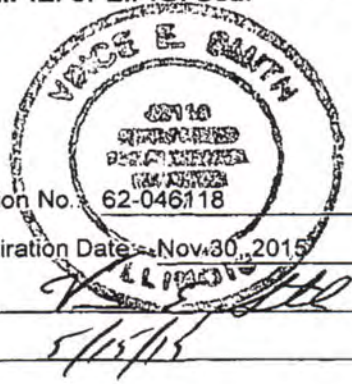
I certify under penalty of law that all activities that are the subject of this report were conducted under my supervision or were conducted under the supervision of another Licensed Professional Engineer or Licensed Professional Geologist and reviewed by me; that this report and all attachments were prepared under my supervision; that, to the best of my knowledge and belief, the work described in this report has been completed in accordance with the Environmental Protection Act [415 ILCS 5], 35 Ill. Adm. Code 734, and generally accepted standards and practices of my profession; and that the information presented is accurate and complete. I am aware there are significant penalties for submitting false statements or representations to the Illinois EPA, including but not limited to fines, imprisonment, or both as provided in Sections 44 and 57.17 of the Environmental Protection Act [415 ILCS 5/44 and 57.17].

RECEIVED
MAY 22 2015
IEPA/BOL

Licensed Professional Engineer or Geologist

Name: Vince Smith
Company: CWM Company, Inc.
Address: 701 South Grand Avenue West
City: Springfield
State: Illinois
Zip Code: 62704
Phone: (217) 522-8001

L.P.E. or L.P.G. Seal



Ill. Registration No.: 62-046118
License Expiration Date: Nov. 30, 2015
Signature:
Date: 5/15/15

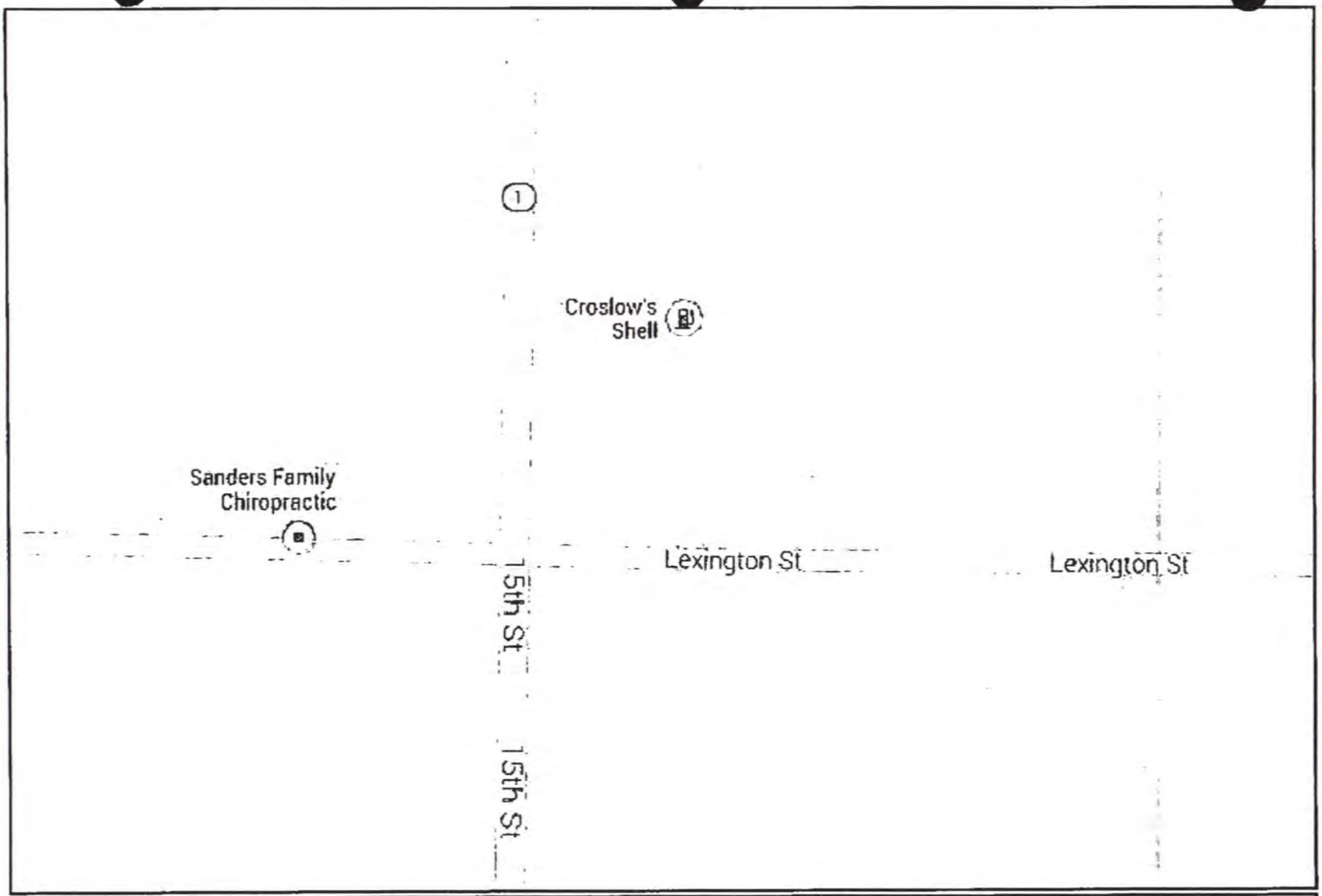
APPENDIX B

SITE MAPS AND ILLUSTRATIONS

SITE INVESTIGATION COMPLETION REPORT
DERSCH CROSLOWS
LAWRENCEVILLE, ILLINOIS

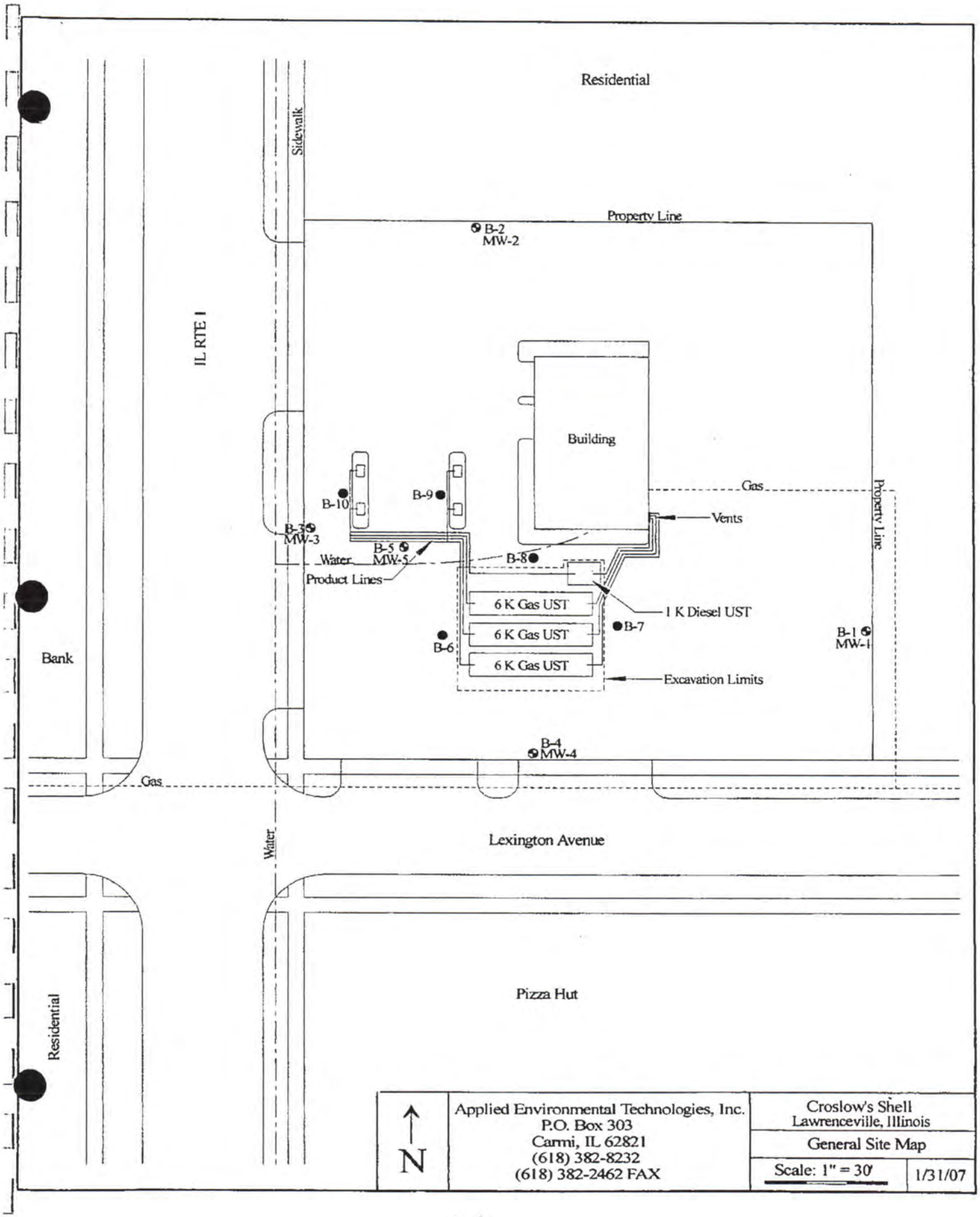
INDEX OF DRAWINGS

Drawing Number	Description	File Name
0001A	Site Location Map	SiteMap.doc
0001B	Surrounding Populations Map	SP.doc
A-2	General Site Map	AET.dwg
A-3	Soil Analytical Results (Stage 1)	AET.dwg
A-4	Groundwater Analytical Results Map (Stage 1)	AET.dwg
A-5	GW Flow Direction (10/24/06)	AET.dwg
A-6	Geological Cross-Section	AET.dwg
A-7	Geological Cross-Section	AET.dwg
0002	Site Map	Site.dwg
0003	Soil Boring Location Map	SBLOC.dwg
0004	Monitoring Well Location Map	MWLOC.dwg
0005	Monitoring Well Elevation Map	MWELEV.dwg
0006	Groundwater Elevation Map (April 2014)	GWelev.dwg
0007	Groundwater Contamination Map	GWcont.dwg
0008	Stage 2/3 Soil Contamination Map	SBCONT.dwg



CW³M Company, Inc. 701 South Grand Avenue West Springfield, IL 62704 (217)-522-8001	**Site Location Map** 1421 Lexington Avenue Lawrenceville, Illinois	Drawn By: BMW Reviewed By: CLR Drawing 0001A SiteMap.doc

CW²M Company, Inc. 701 South Grand Avenue West Springfield, IL 62704 (217)-522-8001	**Surrounding Populations Map** 1421 Lexington Avenue Lawrenceville, Illinois	Drawn By: BMW Reviewed By: CLR Drawing 0001B SP.doc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MW-2
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MW-3
B-5
MW-5
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MW-1
Excavation Limits
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B-4
MW-4
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Residential
Pizza Hut
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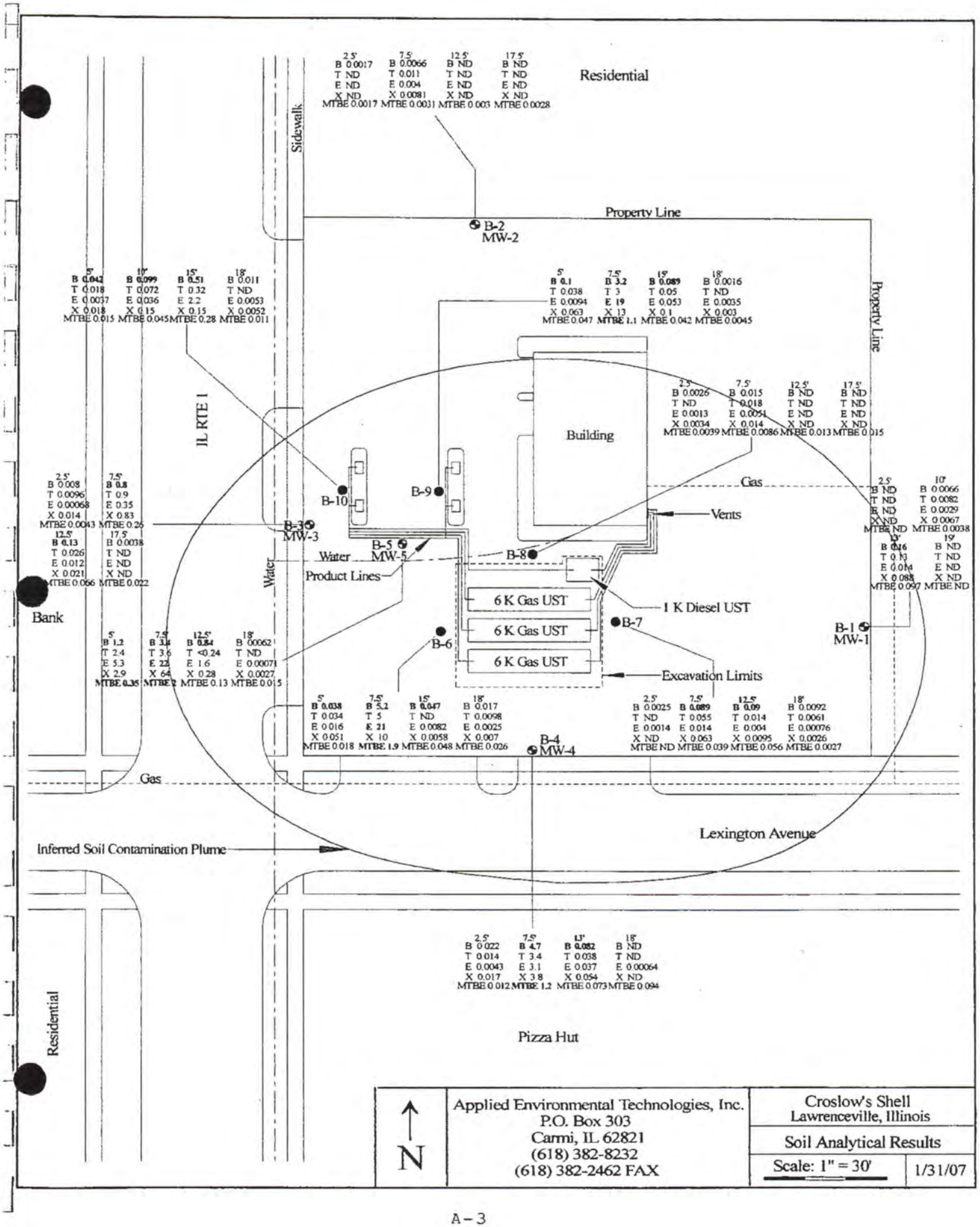
Applied Environmental Technologies, Inc.
P.O. Box 303
Carmi, IL 62821
(618) 382-8232
(618) 382-2462 FAX
Croslow's Shell
Lawrenceville, Illinois
General Site Map
Scale: 1" = 30'
1/31/07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Inferred Soil Contamination Plume
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P.O. Box 303
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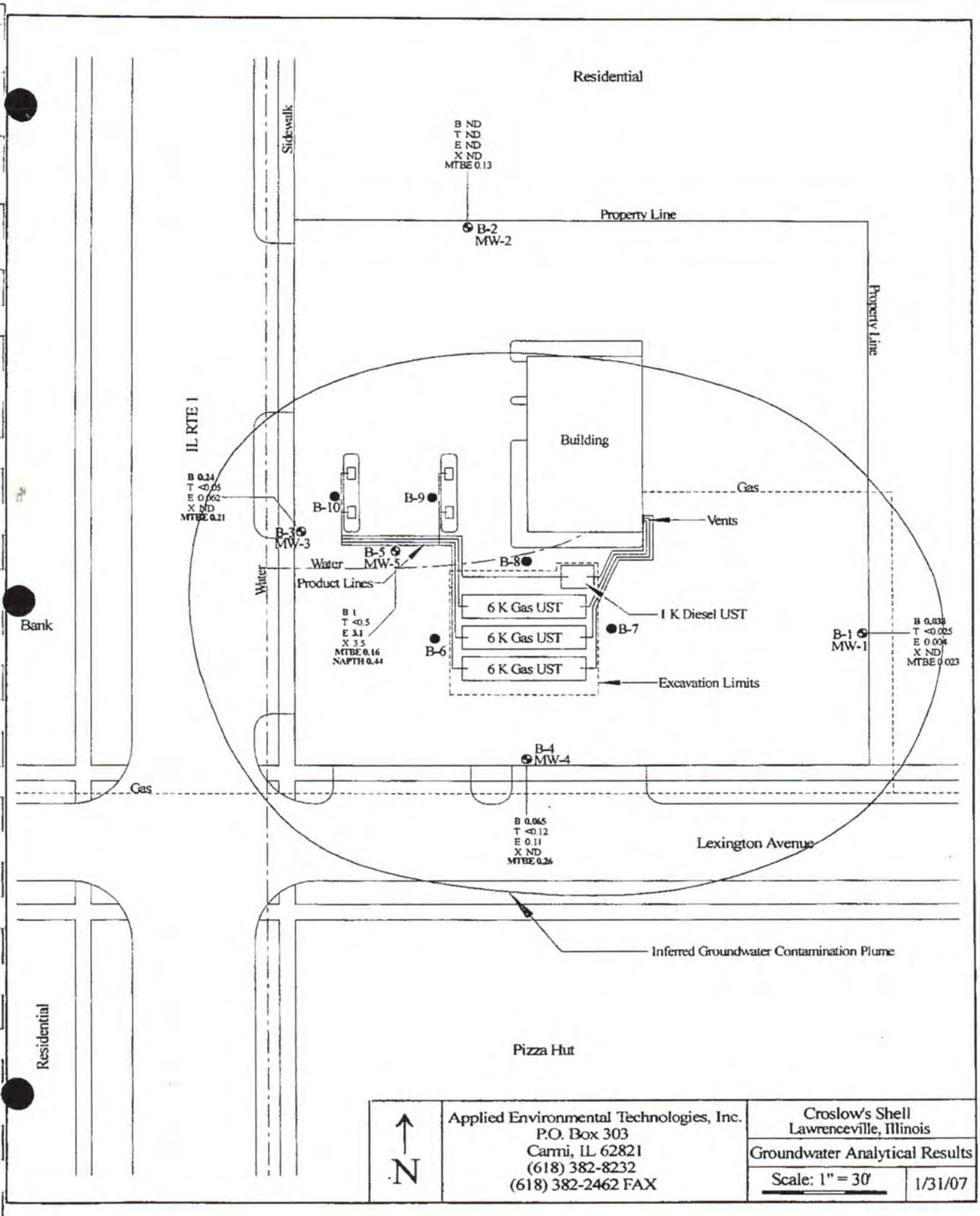
(618) 382-8232
(618) 382-2462 FAX
Croslow's Shell
Lawrenceville, Illinois
Soil Analytical Results
Scale: 1" = 30'
1/31/07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Lexington Avenue
Inferred Groundwater Contamination Plume
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Lawrenceville, Illinois
Groundwater Analytical Results
Scale: 1" = 30'
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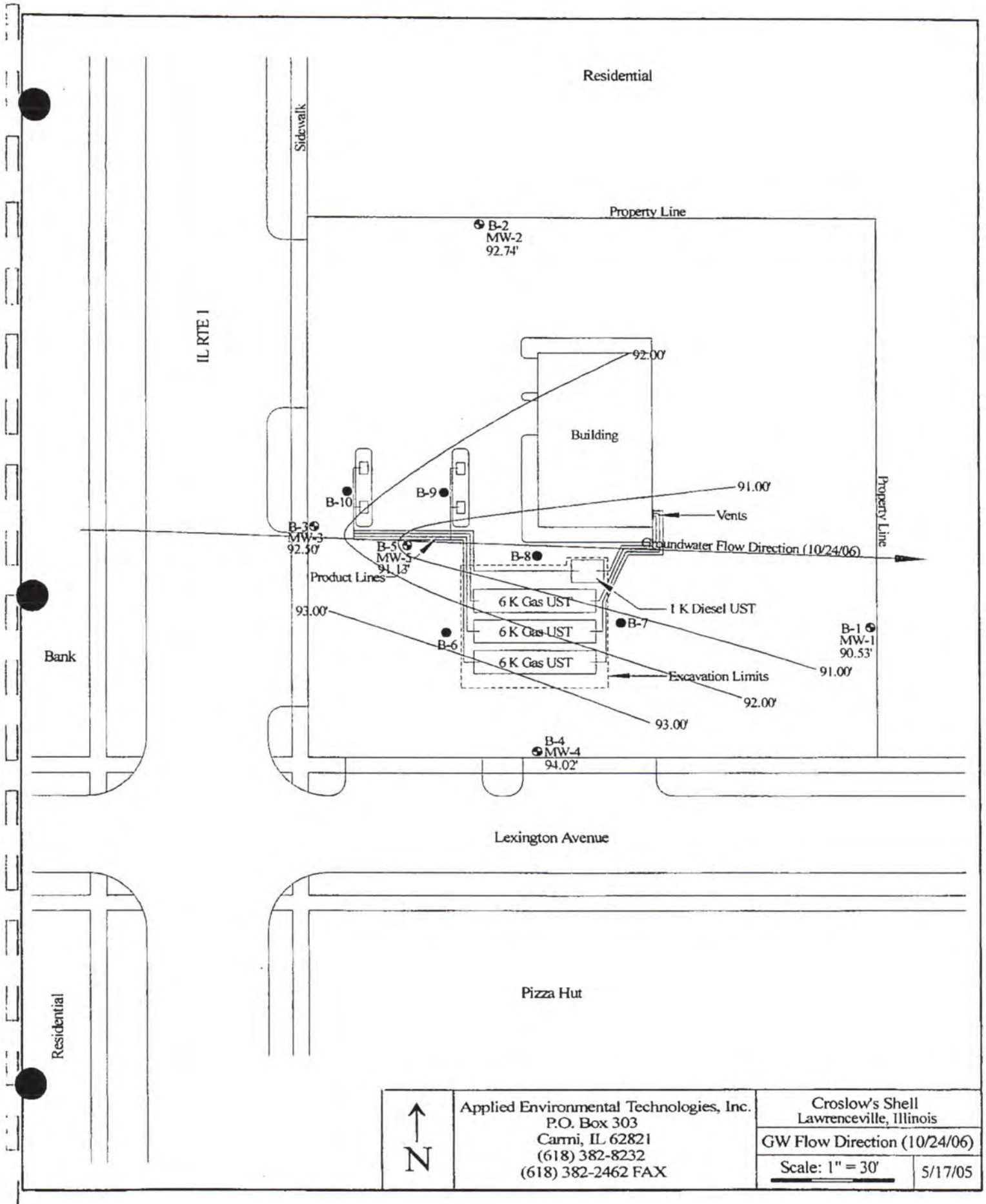
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Excavation Limits
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MW-4
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Pizza Hut
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(618) 382-8232
(618) 382-2462 FAX
Croslow's Shell
Lawrenceville, Illinois
GW Flow Direction (10/24/06)
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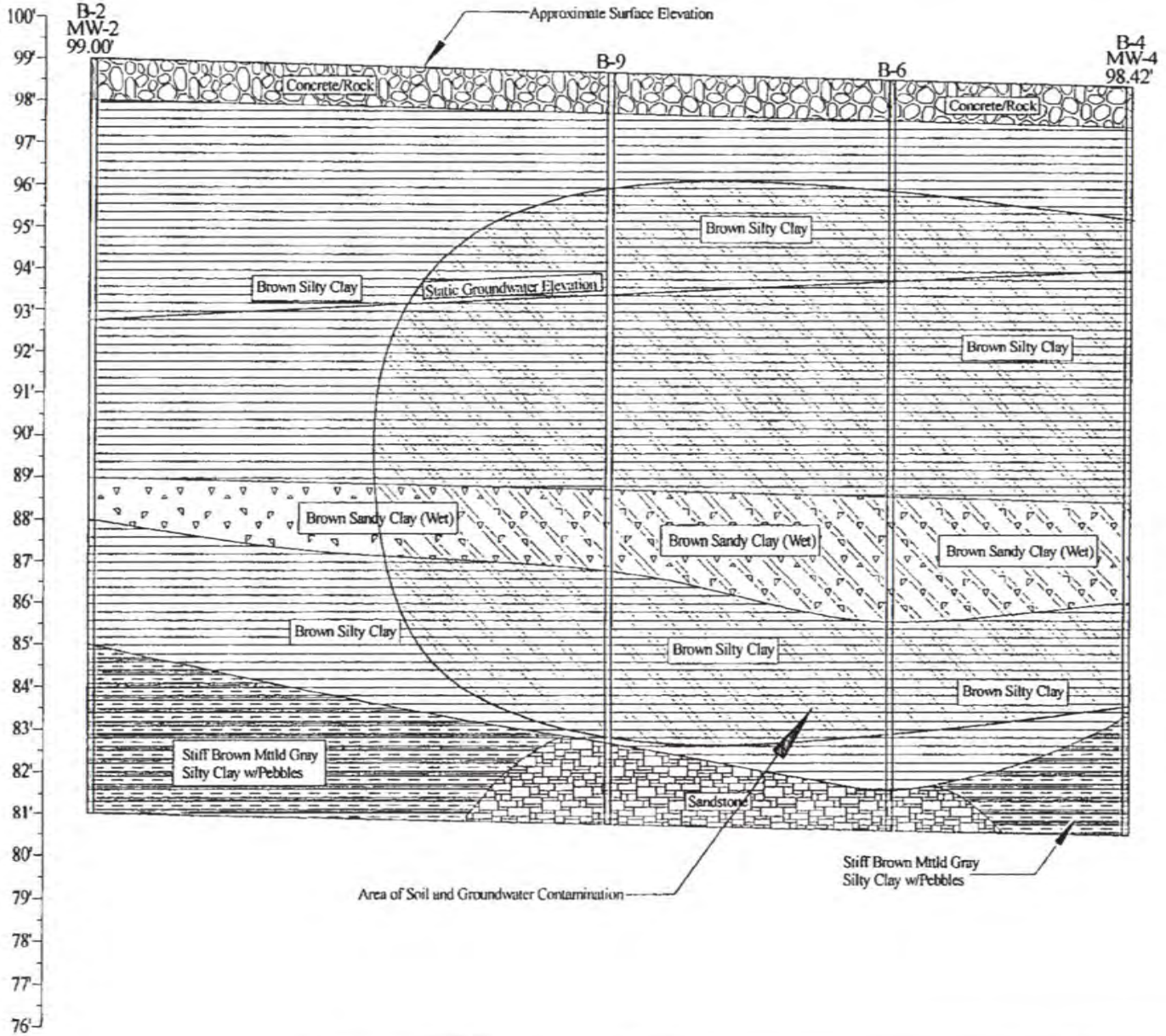
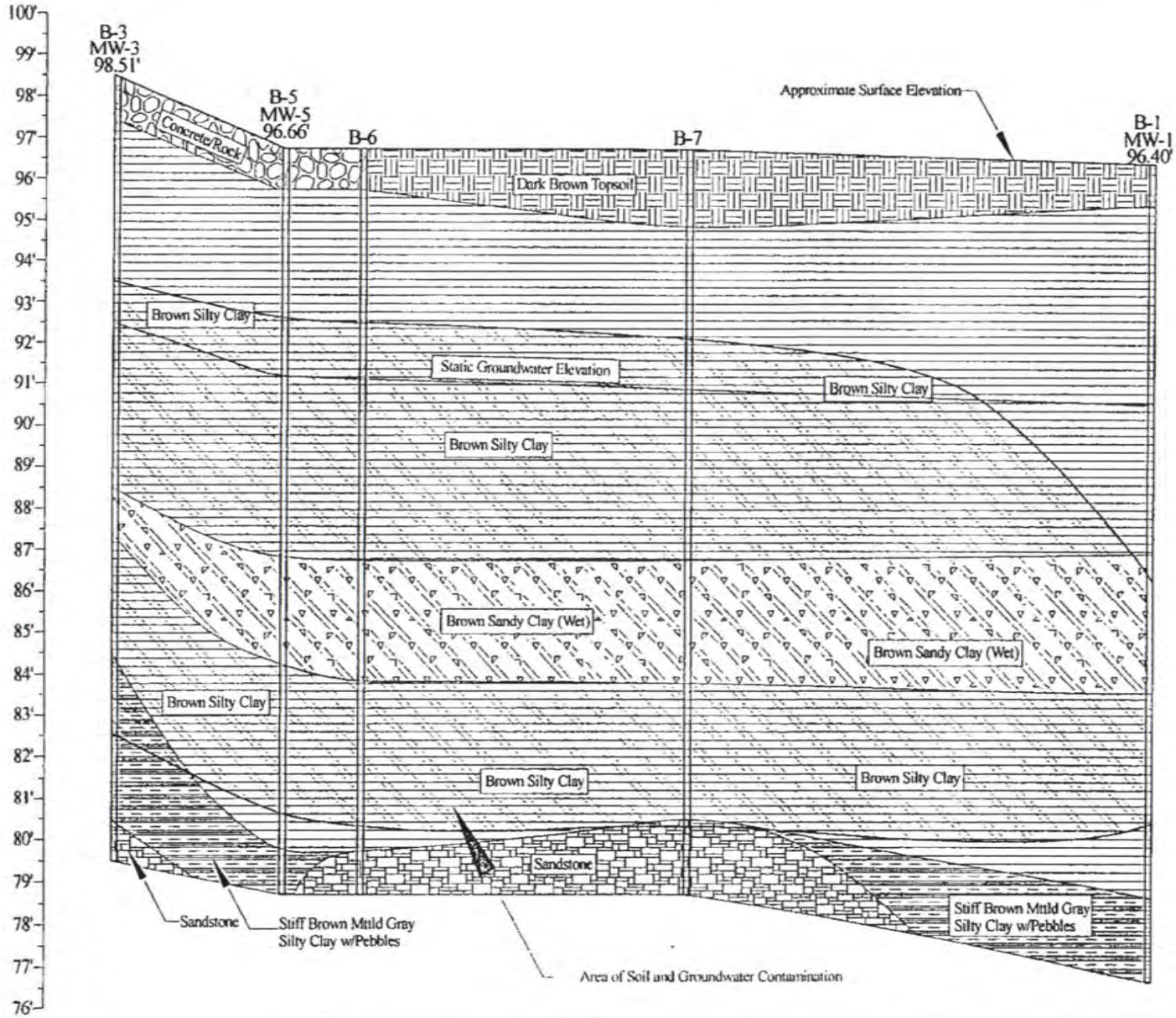
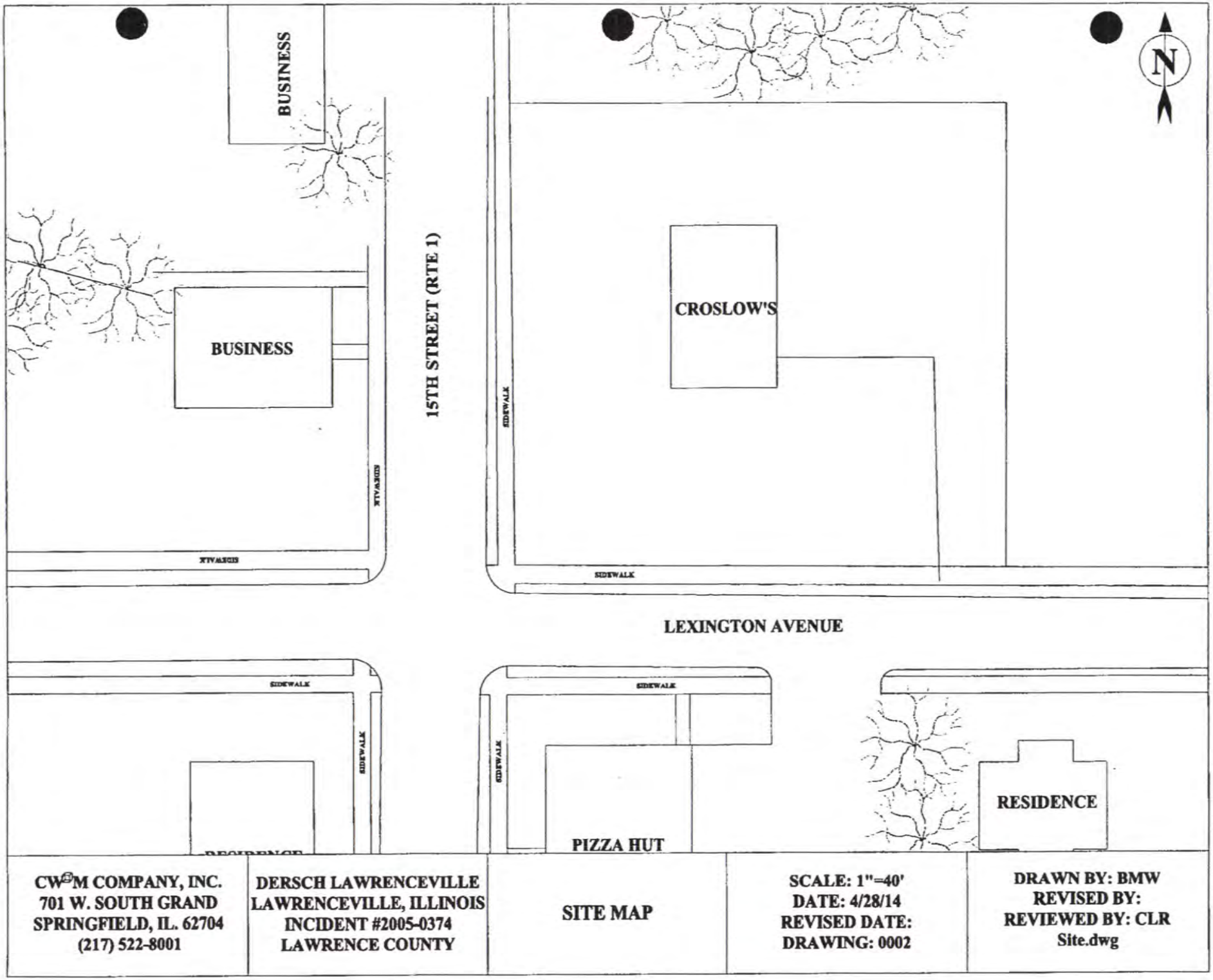


Horizontal Scale: 1" = 20' Vertical Scale on Drawing	Applied Environmental Technologies, Inc. P.O. Box 303 Carmi, IL 62821 (618) 382-8232 (618) 382-2462 FAX	Croslow's Shell Lawrenceville, Illinois Geological Cross-Section North to South (B-2 to B-4) 1/29/07

A-6



Horizontal Scale: 1" = 20' Vertical Scale on Drawing	Applied Environmental Technologies, Inc. P.O. Box 303 Carmi, IL 62821 (618) 382-8232 (618) 382-2462 FAX	Croslow's Shell Lawrenceville, Illinois Geological Cross-Section West to East (B-3 to B-1) 1/29/07



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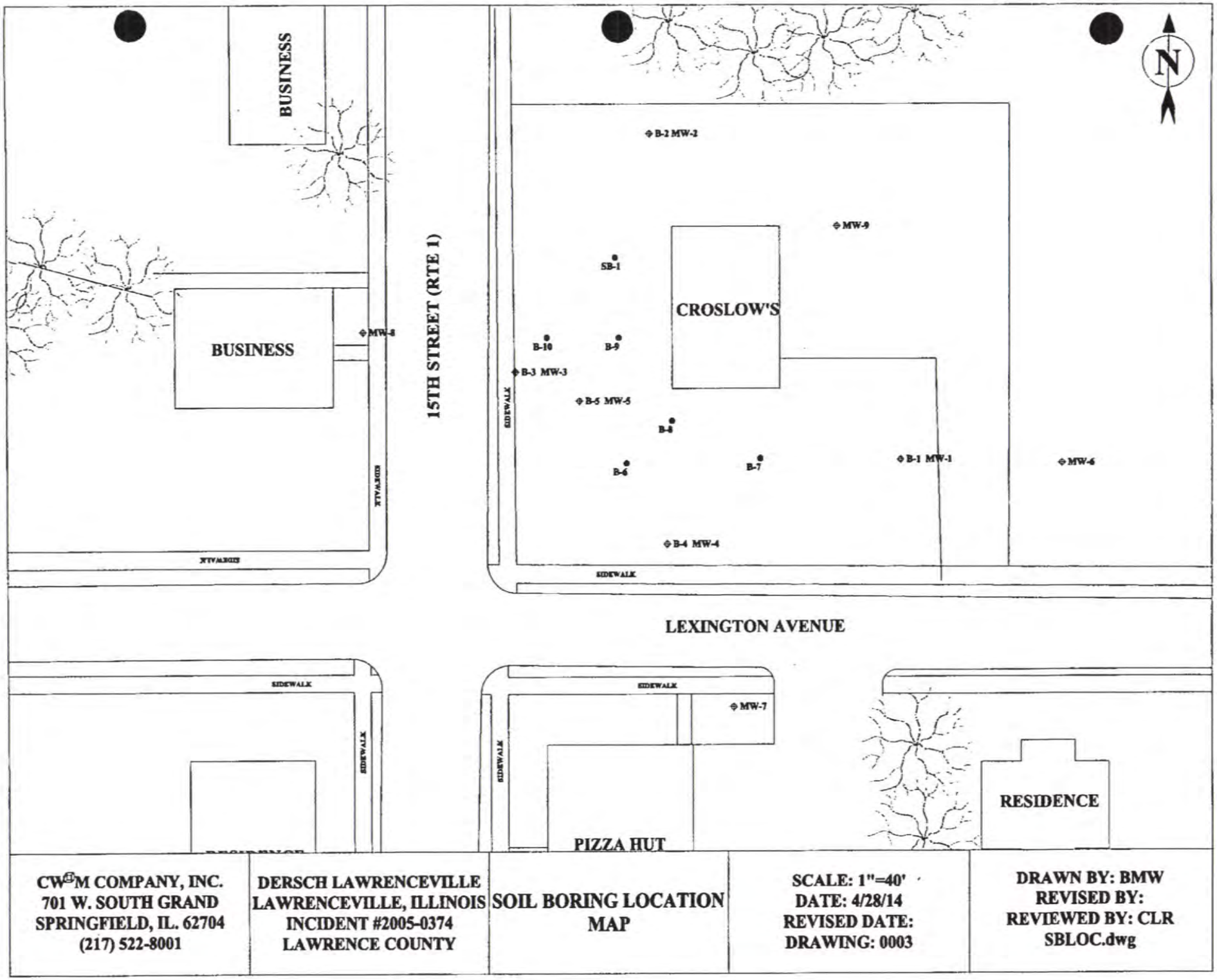
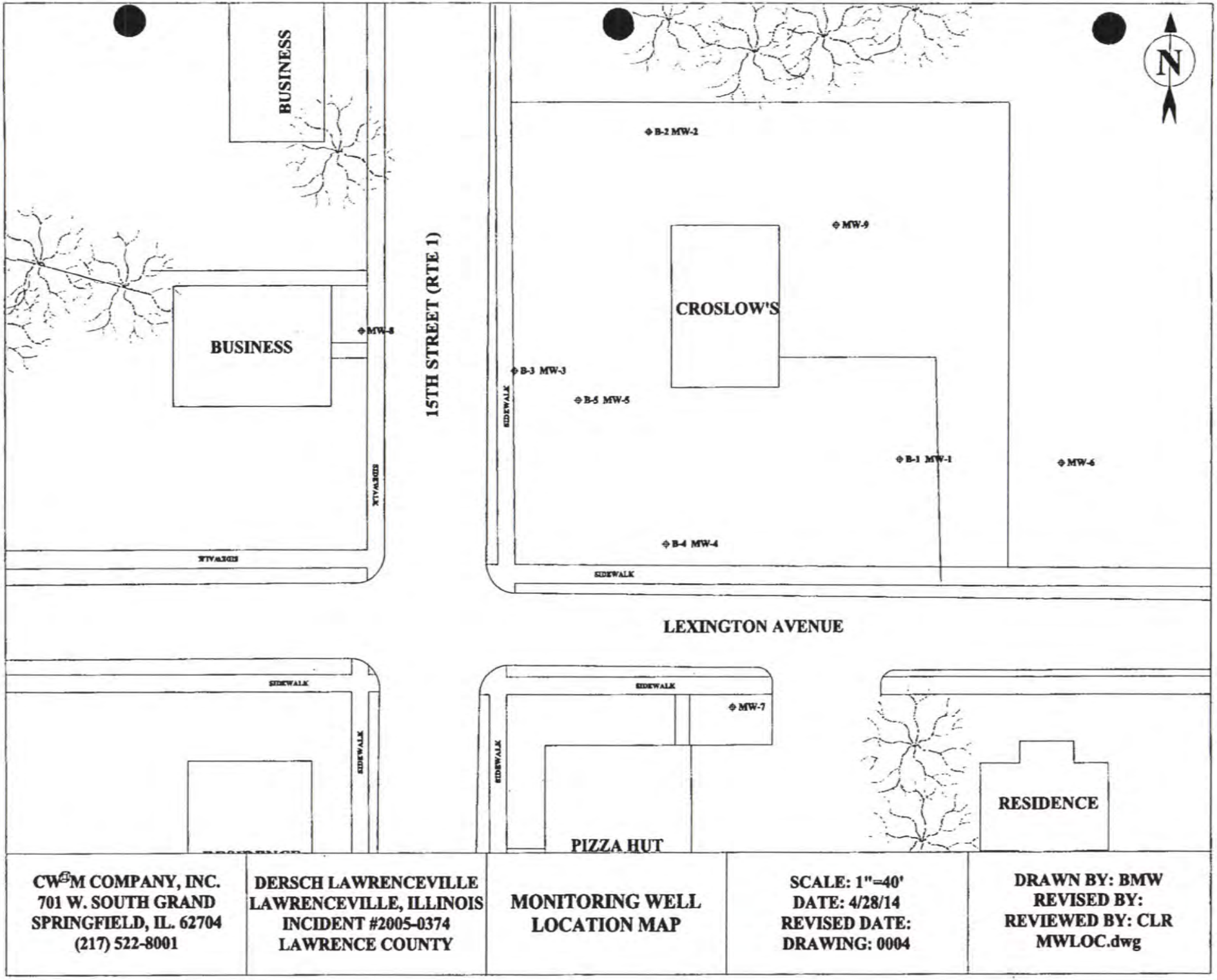
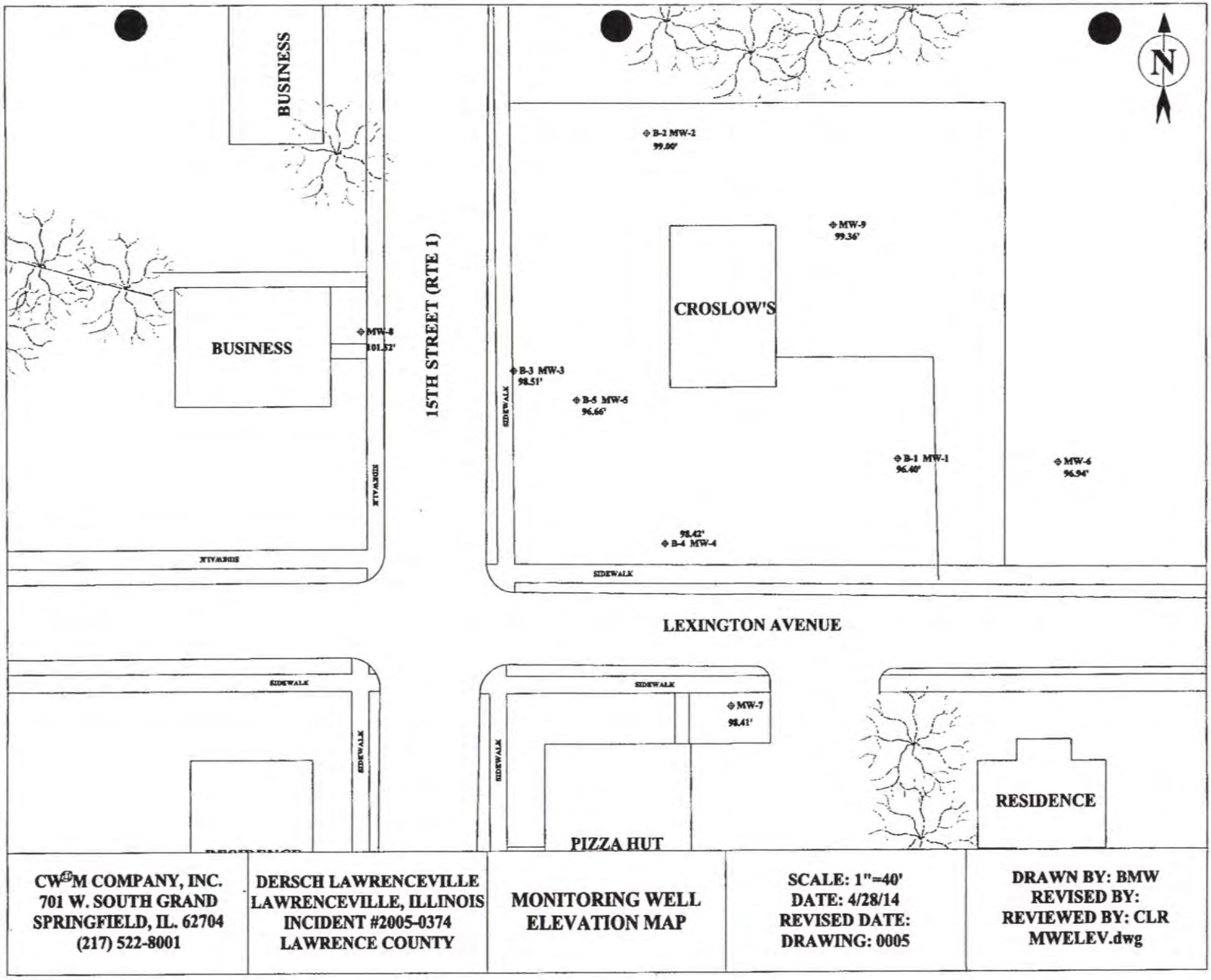


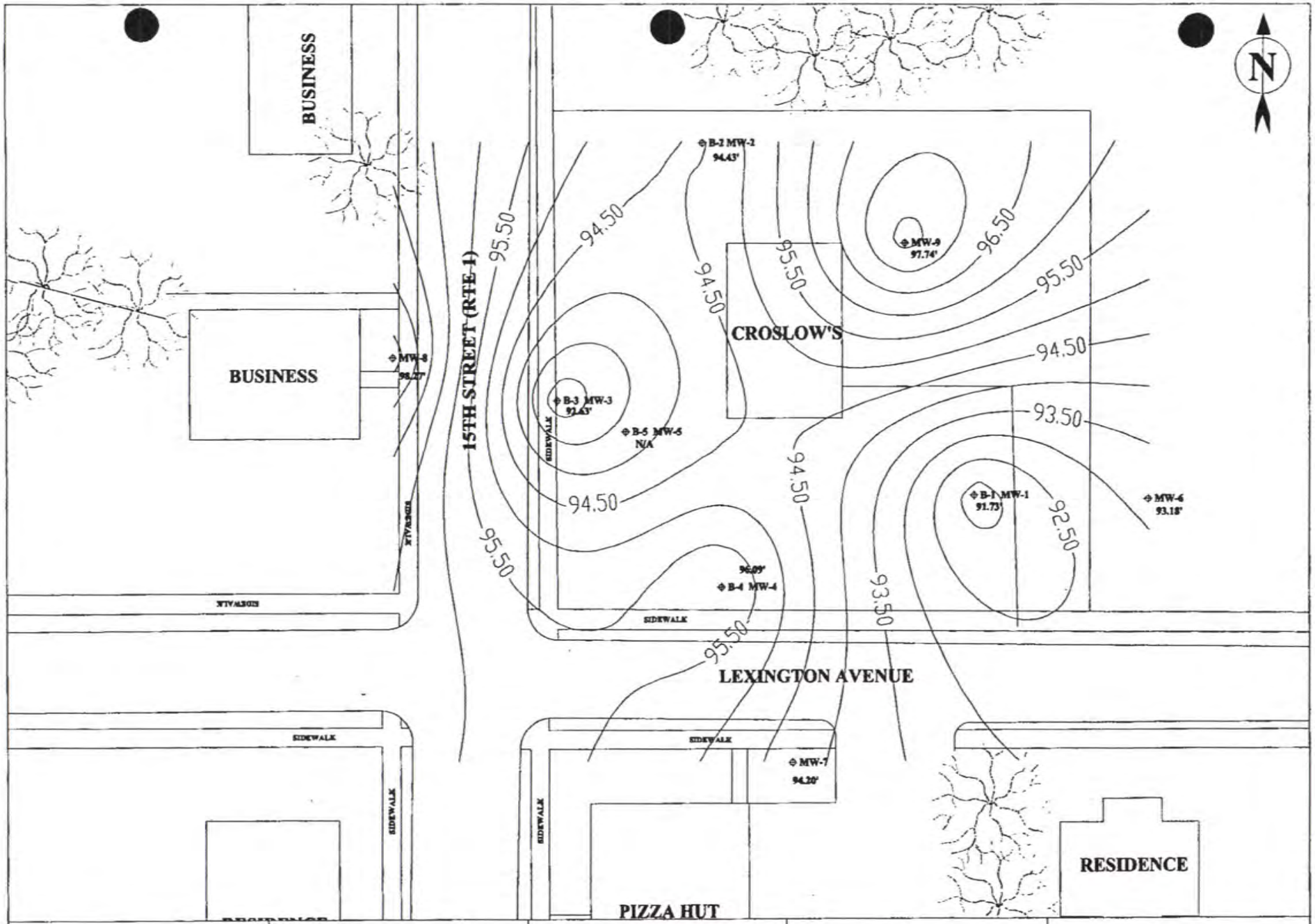
CW²M COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001	DERSCH LAWRENCEVILLE LAWRENCEVILLE, ILLINOIS INCIDENT #2005-0374 LAWRENCE COUNTY	SOIL BORING LOCATION MAP	SCALE: 1"=40' DATE: 4/28/14 REVISED DATE: DRAWING: 0003	DRAWN BY: BMW REVISED BY: REVIEWED BY: CLR SBLOC.dwg



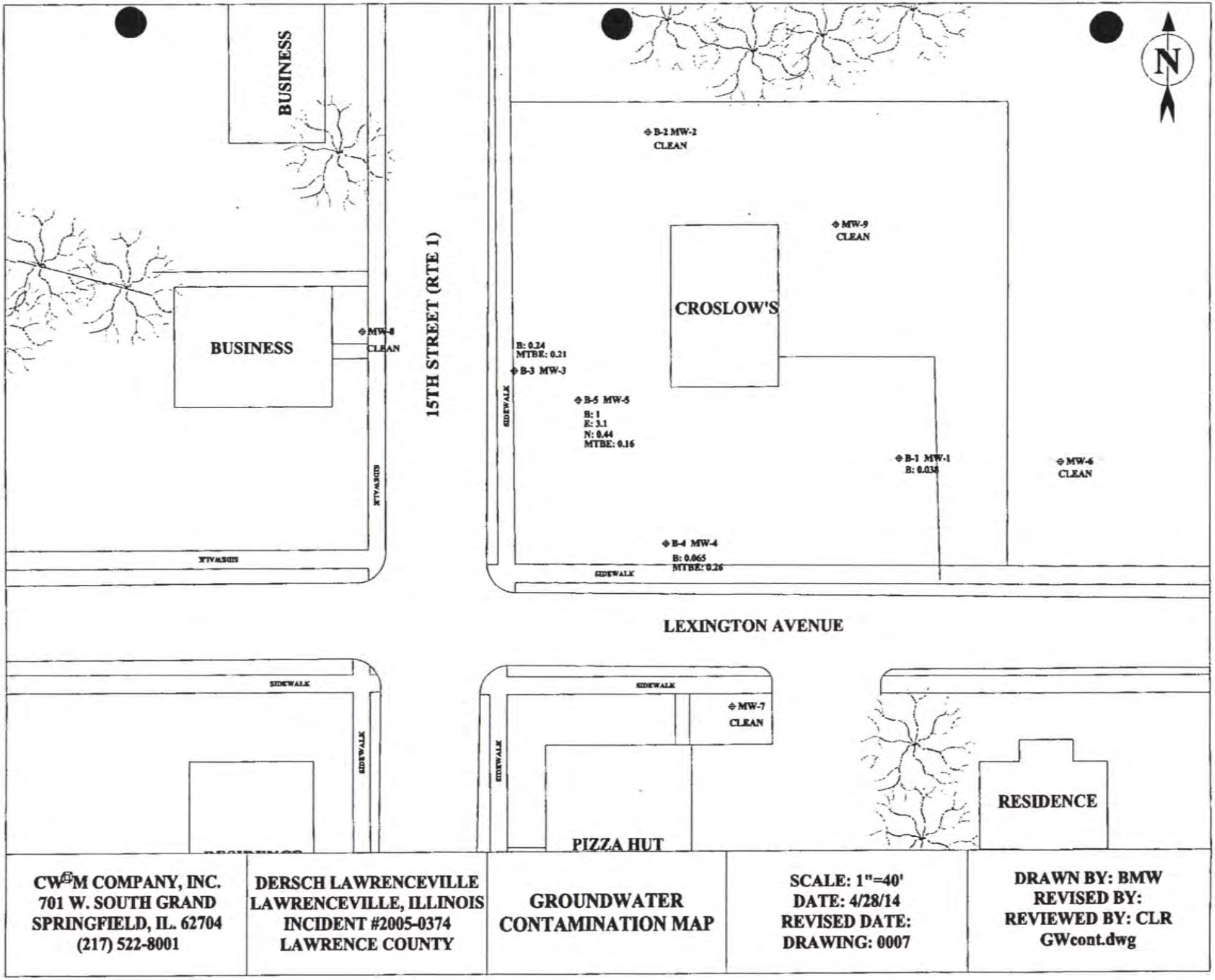
CW²M COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001	DERSCH LAWRENCEVILLE LAWRENCEVILLE, ILLINOIS INCIDENT #2005-0374 LAWRENCE COUNTY	MONITORING WELL LOCATION MAP	SCALE: 1"=40' DATE: 4/28/14 REVISED DATE: DRAWING: 0004	DRAWN BY: BMW REVISED BY: REVIEWED BY: CLR MWLOC.dwg



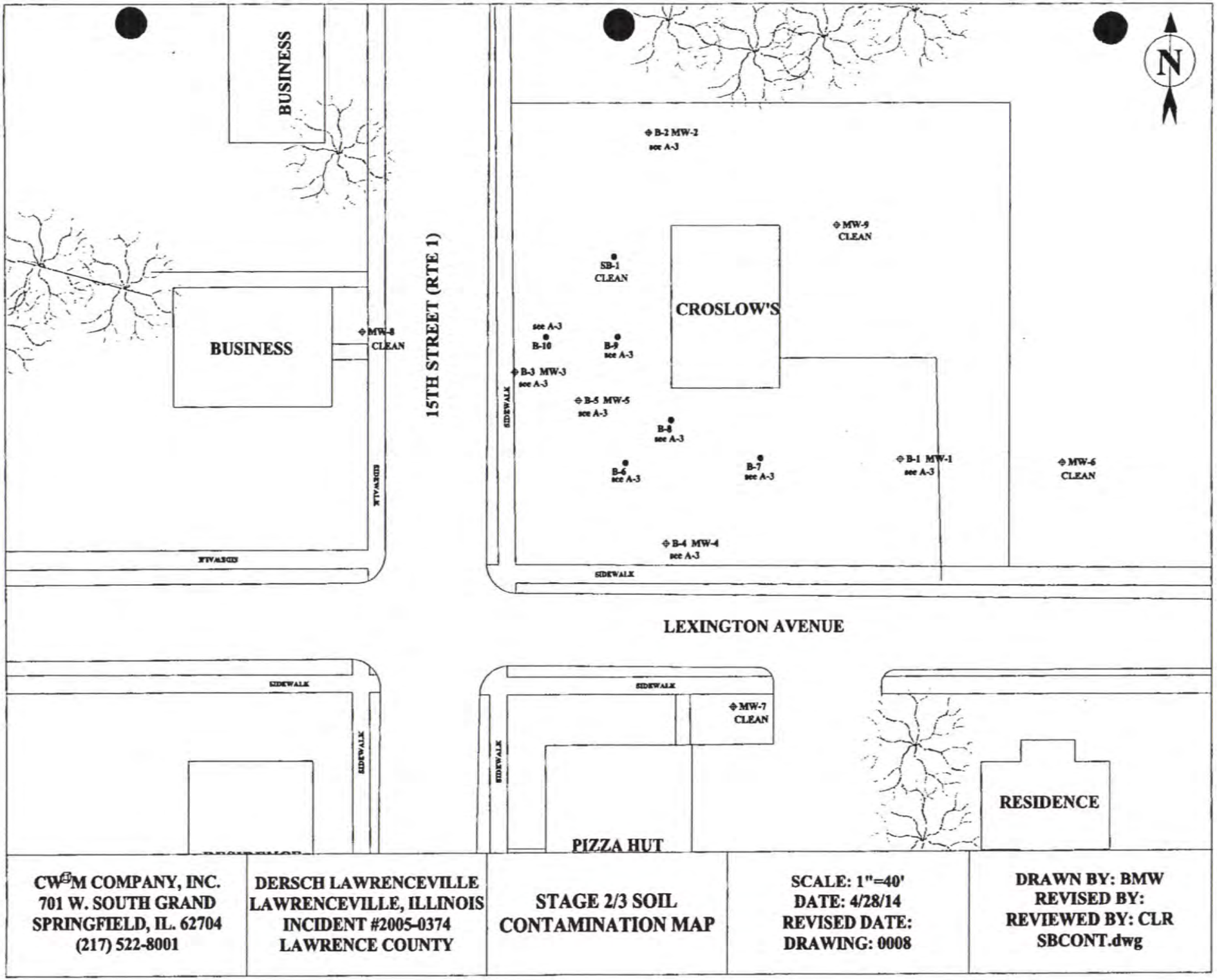
CW[E]M COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001	DERSCH LAWRENCEVILLE LAWRENCEVILLE, ILLINOIS INCIDENT #2005-0374 LAWRENCE COUNTY	MONITORING WELL ELEVATION MAP	SCALE: 1"=40' DATE: 4/28/14 REVISED DATE: DRAWING: 0005	DRAWN BY: BMW REVISED BY: REVIEWED BY: CLR MWELEV.dwg



CW²M COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001	DERSCH LAWRENCEVILLE LAWRENCEVILLE, ILLINOIS INCIDENT #2005-0374 LAWRENCE COUNTY	GROUNDWATER ELEVATION MAP (APRIL 2014)	SCALE: 1"=40' DATE: 4/28/14 REVISED DATE: DRAWING: 0006	DRAWN BY: BMW REVISED BY: REVIEWED BY: CLR GWELEV.dwg



CW[M] COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001	DERSCH LAWRENCEVILLE LAWRENCEVILLE, ILLINOIS INCIDENT #2005-0374 LAWRENCE COUNTY	GROUNDWATER CONTAMINATION MAP	SCALE: 1"=40' DATE: 4/28/14 REVISED DATE: DRAWING: 0007	DRAWN BY: BMW REVISED BY: REVIEWED BY: CLR GWcont.dwg



CW²M COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001	DERSCH LAWRENCEVILLE LAWRENCEVILLE, ILLINOIS INCIDENT #2005-0374 LAWRENCE COUNTY	STAGE 2/3 SOIL CONTAMINATION MAP	SCALE: 1"=40' DATE: 4/28/14 REVISED DATE: DRAWING: 0008	DRAWN BY: BMW REVISED BY: REVIEWED BY: CLR SBCONT.dwg

APPENDIX C

ILLINOIS OFFICE OF THE STATE FIRE MARSHAL ELIGIBILITY DETERMINATION

SITE INVESTIGATION COMPLETION REPORT
DERSCH CROSLOWS
LAWRENCEVILLE, ILLINOIS

Office of the Illinois
State Fire Marshal

General Office
217-785-0969
FAX
217-782-1062
Divisions
ARSON INVESTIGATION
217-782-9116
BOILER and PRESSURE VESSEL SAFETY
217-782-2696
FIRE PREVENTION
217-785-4714
MANAGEMENT SERVICES
217-782-9889
INFIRS
217-785-5826
HUMAN RESOURCES
217-785-1026
PERSONNEL STANDARDS and EDUCATION
217-782-4542
PETROLEUM and CHEMICAL SAFETY
217-785-5878
PUBLIC INFORMATION
217-785-1021
WEB SITE
www.state.il.us/osfm

CERTIFIED MAIL - RECEIPT REQUESTED #7003 3110 0004 1273 6538

May 5, 2005

Dersch Energies, Inc.
620 Oak Street
P.O. Box 217
Mount Carmel, IL 62863

In Re: Facility No. 7-009254
IEMA Incident No. 05-0374
Croslow's Shell
1421 Lexington
Lawrenceville, Lawrence Co., IL

Dear Applicant:

The Reimbursement Eligibility and Deductible Application received on March 31, 2005 for the above referenced occurrence has been reviewed. The following determinations have been made based upon this review.

It has been determined that you are eligible to seek payment of costs in excess of **$10,000**. The costs must be in response to the occurrence referenced above and associated with the following tanks:

Eligible Tanks

Tank 1 6,000 gallon Gasoline
Tank 2 6,000 gallon Gasoline
Tank 3 6,000 gallon Gasoline
Tank 4 1,000 gallon Diesel

You must contact the Illinois Environmental Protection Agency to receive a packet of Agency billing forms for submitting your request for payment.

An owner or operator is eligible to access the Underground Storage Tank Fund if the eligibility requirements are satisfied:

1. Neither the owner nor the operator is the United States Government,

2. The tank does not contain fuel which is exempt from the Motor Fuel Tax Law,

3. The costs were incurred as a result of a confirmed release of any of the following substances:

"Fuel", as defined in Section 1.19 of the Motor Fuel Tax Law

Aviation fuel

Heating oil

Kerosene

Used oil, which has been refined from crude oil used in a motor vehicle, as defined in Section 1.3 of the Motor Fuel Tax Law.

4. The owner or operator registered the tank and paid all fees in accordance with the statutory and regulatory requirements of the Gasoline Storage Act.

5. The owner or operator notified the Illinois Emergency Management Agency of a confirmed release, the costs were incurred after the notification and the costs were a result of a release of a substance listed in this Section. Costs of corrective action or indemnification incurred before providing that notification shall not be eligible for payment.

6. The costs have not already been paid to the owner or operator under a private insurance policy, other written agreement, or court order.

7. The costs were associated with "corrective action".

This constitutes the final decision as it relates to your eligibility and deductibility. We reserve the right to change the deductible determination should additional information that would change the determination become available. An underground storage tank owner or operator may appeal the decision to the Illinois Pollution Control Board (Board), pursuant to Section 57.9 (c) (2). An owner or operator who seeks to appeal the decision shall file a petition for a hearing before the Board within 35 days of the date of mailing of the final decision, (35 Illinois Administrative Code 105.102(a) (2)).

For information regarding the filing of an appeal, please contact:

Dorothy Gunn, Clerk
Illinois Pollution Control Board
State of Illinois Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601
(312) 814-3620

The following tanks are also listed for this site:

Tank 5 560 gallon Used Oil

Your application indicates that there has not been a release from these tanks under this incident number. You may be eligible to seek payment of corrective action costs associated with these tanks if it is determined that there has been a release from one or more of these tanks. Once it is determined that there has been a release from one or more of these tanks you may submit a separate application for an eligibility determination to seek corrective action costs associated with this/these tanks.

If you have any questions, please contact our Office at (217) 785-1020 or (217) 785-5878.

Sincerely,

Deanne Lock
Administrative Assistant
Division of Petroleum and Chemical Safety

cc: IEPA
Facility File

APPENDIX D

BORING LOGS AND WELL COMPLETION REPORTS

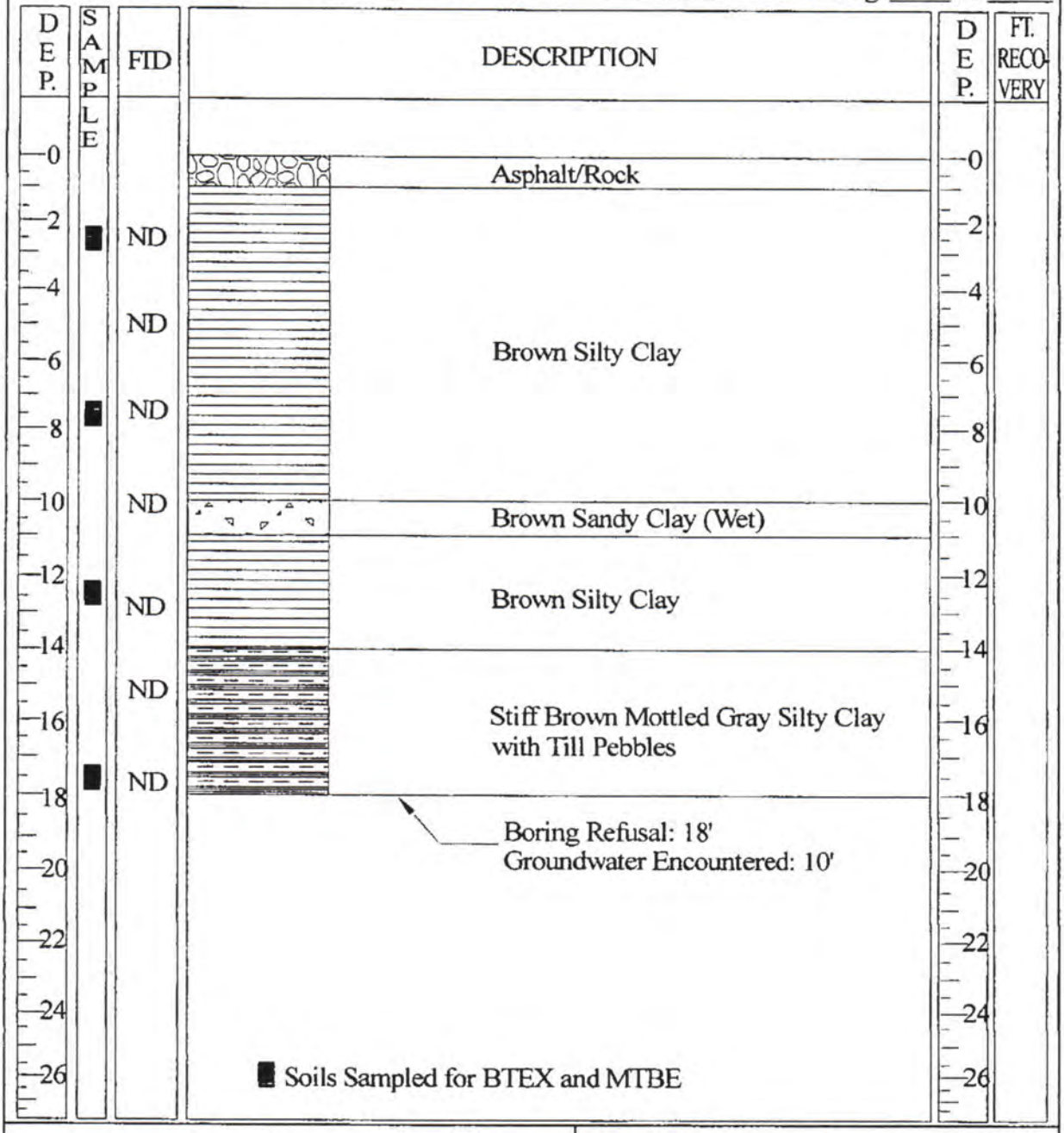
SITE INVESTIGATION COMPLETION REPORT
DERSCH CROSLOWS
LAWRENCEVILLE, ILLINOIS

PROJECT: Croslow's Shell - Dersch Energies, Inc. BORING NO.: B-1 MW-1
LOCATION: Lawrenceville, IL
DATE DRILLED: 10/17/06
DEPTH OF BORING: 20'
WATER INDICATION: 9.5'
WATER SAMPLE: PRODUCT LAYER:
METHODS: DRILLING: Geoprobe SAMPLING: 2" Continuous
DRILLING CO.: Advanced Environmental Drilling, Inc.
OBSERVATIONS BY: Bryan Williams Page 1 of 1

DEP.	SAMPLE	FID	DESCRIPTION	DEP.	FT. RECOVERY
0			Dark Brown Topsoil	0	
2	■	ND	Brown Silty Clay	2	
4		ND		4	
6		ND		6	
8				8	
10	■	35	Brown Sandy Clay (Wet)	10	
12	■	149		12	
14		ND	Brown Silty Clay	14	
16				16	
18		ND	Stiff Brown Mottled Gray Silty Clay with Till Pebbles	18	
20	■	ND	Bottom of Boring: 20' Groundwater Encountered: 9.5'	20	
22				22	
24				24	
26			■ Soils Sampled for BTEX and MTBE	26	

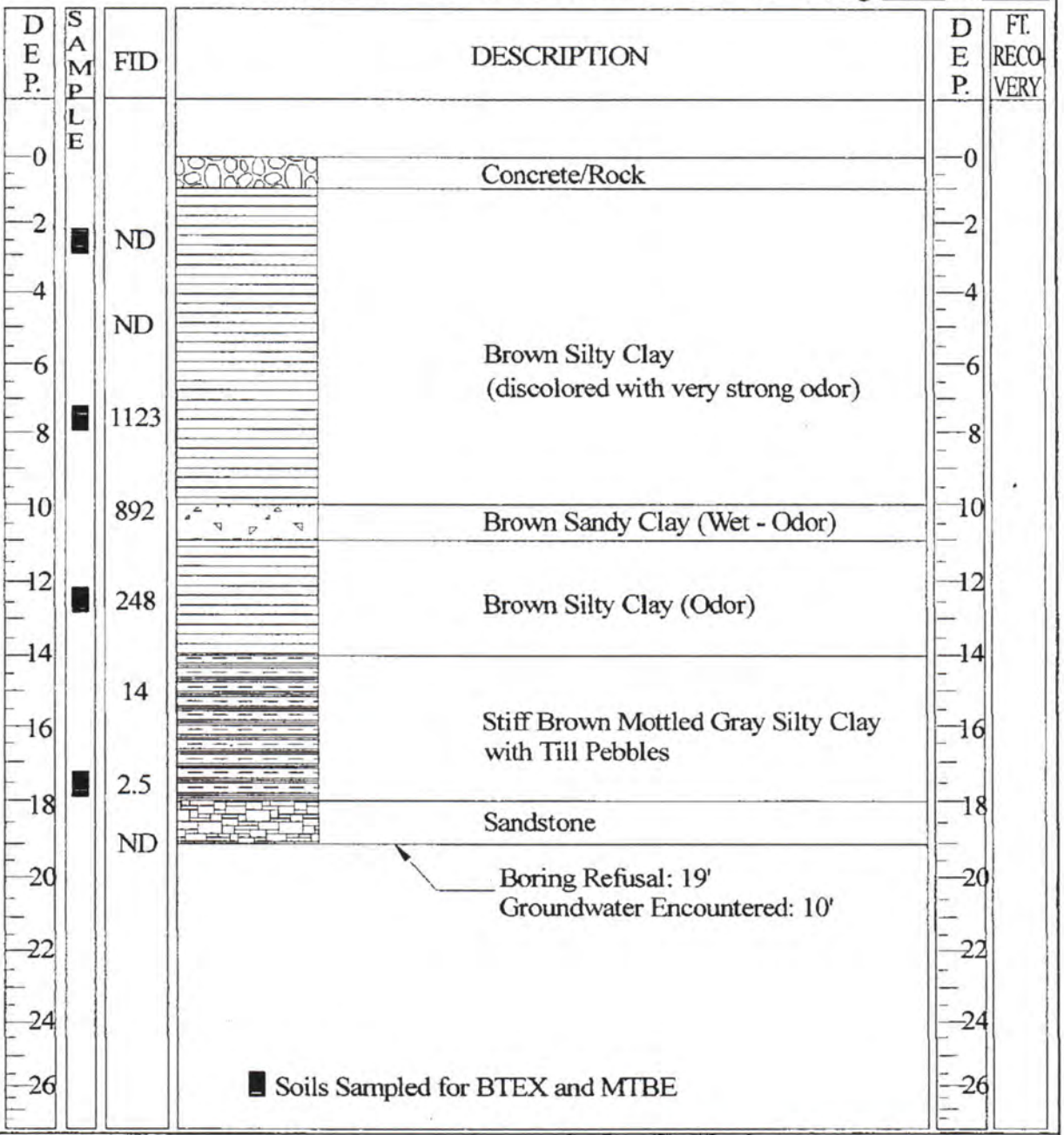
BORING LOG | Applied Environmental Technologies, Inc.

PROJECT: Croslow's Shell - Dersch Energies, Inc. BORING NO.: B-2 MW-2
LOCATION: Lawrenceville, IL
DATE DRILLED: 10/17/06
DEPTH OF BORING: 18'
WATER INDICATION: 10'
WATER SAMPLE: PRODUCT LAYER:
METHODS: DRILLING: Geoprobe SAMPLING: 2" Continuous
DRILLING CO.: Advanced Environmental Drilling, Inc.
OBSERVATIONS BY: Bryan Williams Page 1 of 1



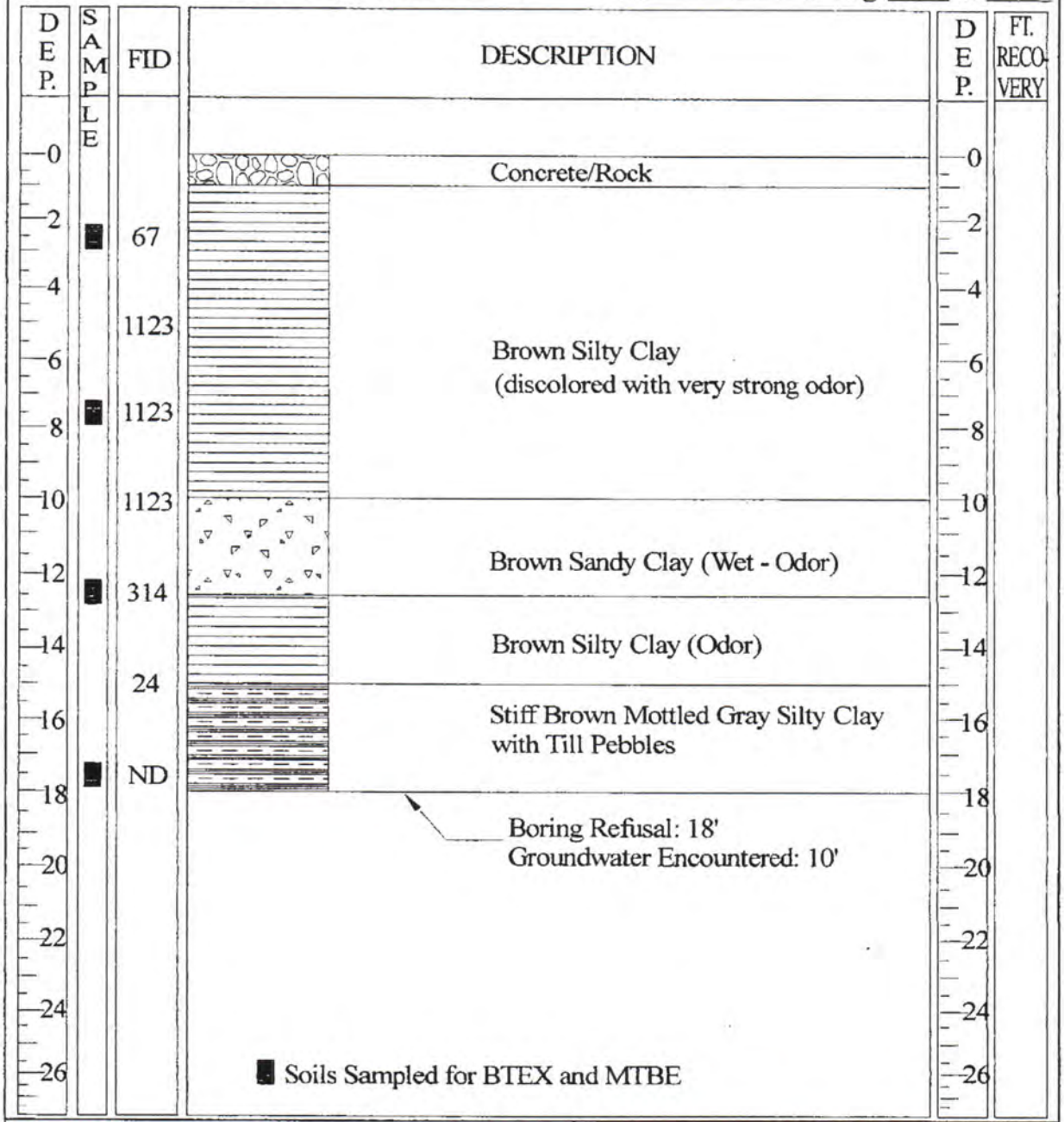
BORING LOG | Applied Environmental Technologies, Inc.

PROJECT: Croslow's Shell - Dersch Energies, Inc. BORING NO.: B-3 MW-3
LOCATION: Lawrenceville, IL
DATE DRILLED: 10/17/06
DEPTH OF BORING: 19'
WATER INDICATION: 10'
WATER SAMPLE: PRODUCT LAYER:
METHODS: DRILLING: Geoprobe SAMPLING: 2" Continuous
DRILLING CO.: Advanced Environmental Drilling, Inc.
OBSERVATIONS BY: Bryan Williams Page 1 of 1



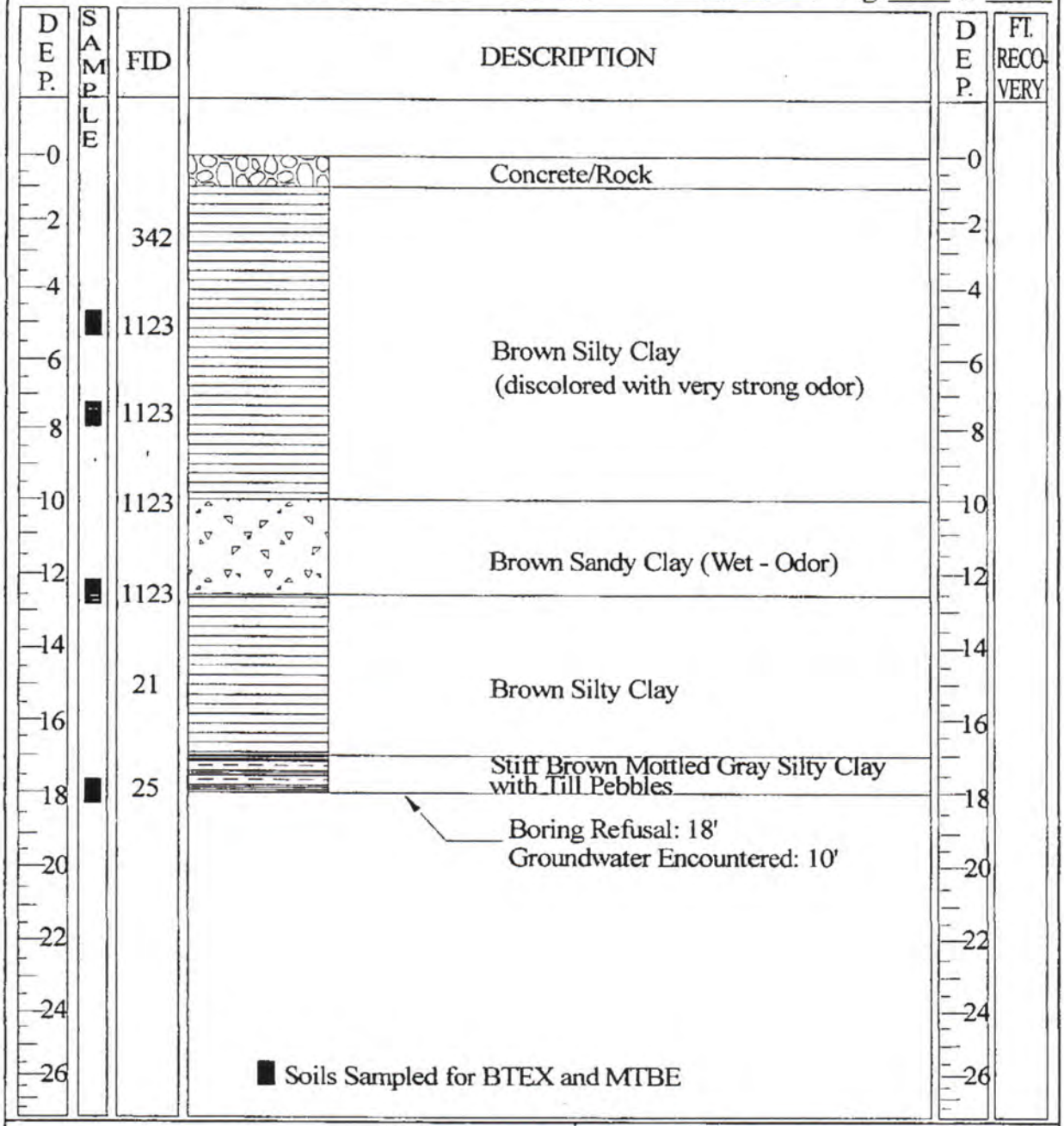
BORING LOG | Applied Environmental Technologies, Inc.

PROJECT: Croslow's Shell - Dersch Energies, Inc. BORING NO.: B-4 MW-4
LOCATION: Lawrenceville, IL
DATE DRILLED: 10/17/06
DEPTH OF BORING: 18'
WATER INDICATION: 10'
WATER SAMPLE: PRODUCT LAYER:
METHODS: DRILLING: Geoprobe SAMPLING: 2" Continuous
DRILLING CO.: Advanced Environmental Drilling, Inc.
OBSERVATIONS BY: Bryan Williams Page 1 of 1



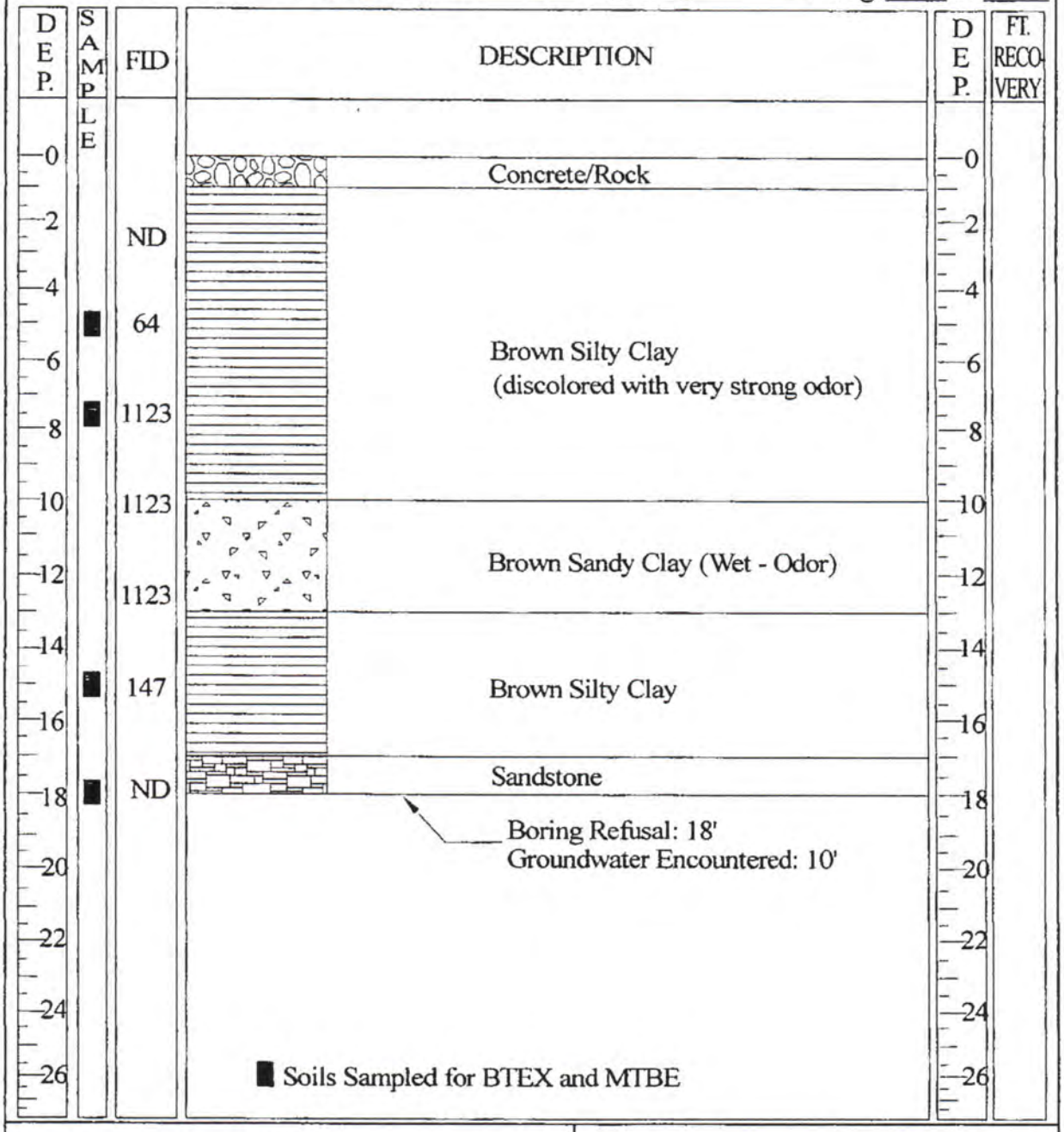
BORING LOG | Applied Environmental Technologies, Inc.

PROJECT: Croslow's Shell - Dersch Energies, Inc. BORING NO.: B-5 MW-5
LOCATION: Lawrenceville, IL
DATE DRILLED: 10/17/06
DEPTH OF BORING: 18'
WATER INDICATION: 10'
WATER SAMPLE: PRODUCT LAYER:
METHODS: DRILLING: Geoprobe SAMPLING: 2" Continuous
DRILLING CO.: Advanced Environmental Drilling, Inc.
OBSERVATIONS BY: Bryan Williams Page 1 of 1



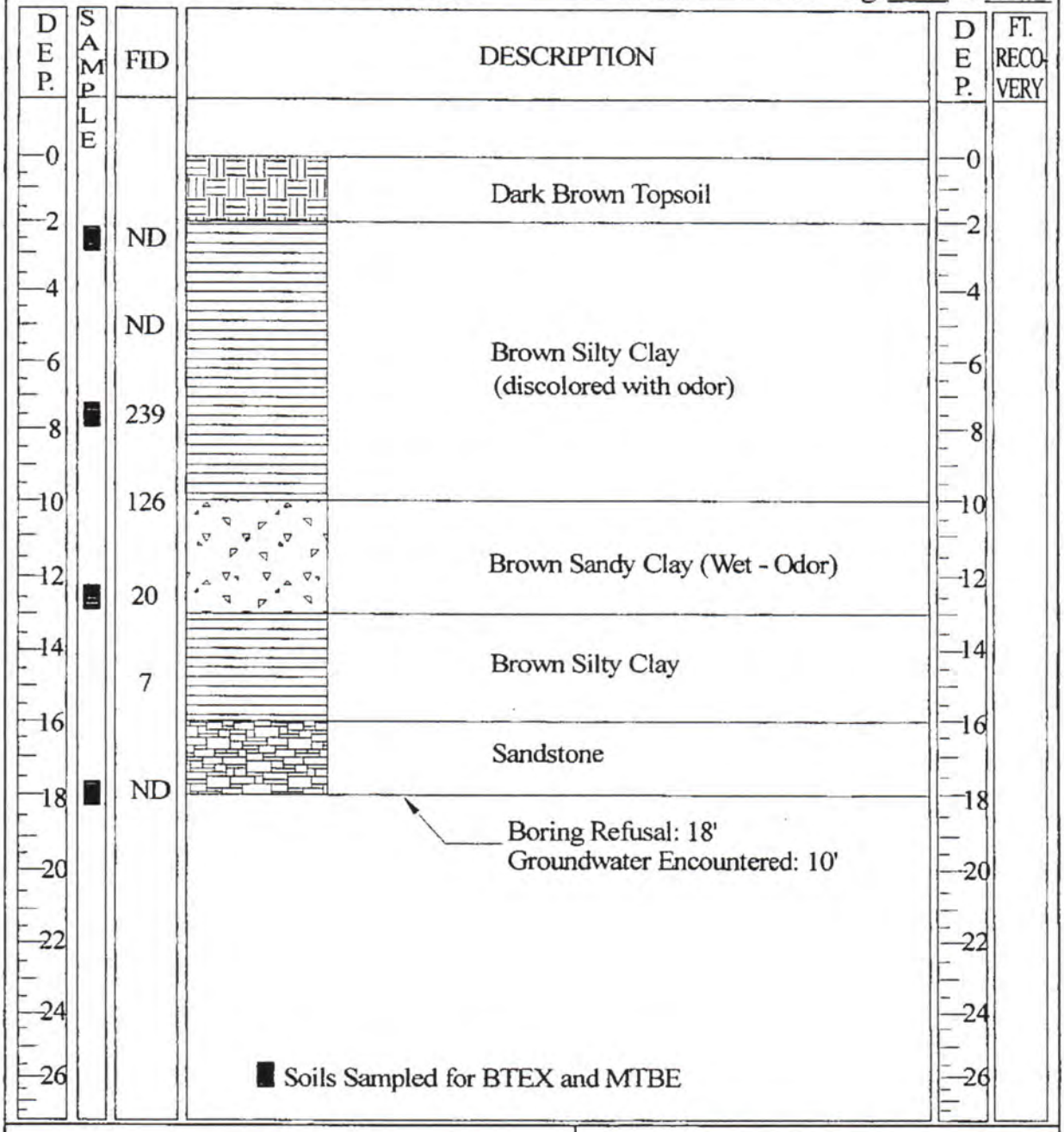
BORING LOG | Applied Environmental Technologies, Inc.

PROJECT: Croslow's Shell - Dersch Energies, Inc. BORING NO.: B-6
LOCATION: Lawrenceville, IL
DATE DRILLED: 10/17/06
DEPTH OF BORING: 18'
WATER INDICATION: 10'
WATER SAMPLE: PRODUCT LAYER:
METHODS: DRILLING: Geoprobe SAMPLING: 2" Continuous
DRILLING CO.: Advanced Environmental Drilling, Inc.
OBSERVATIONS BY: Bryan Williams Page 1 of 1



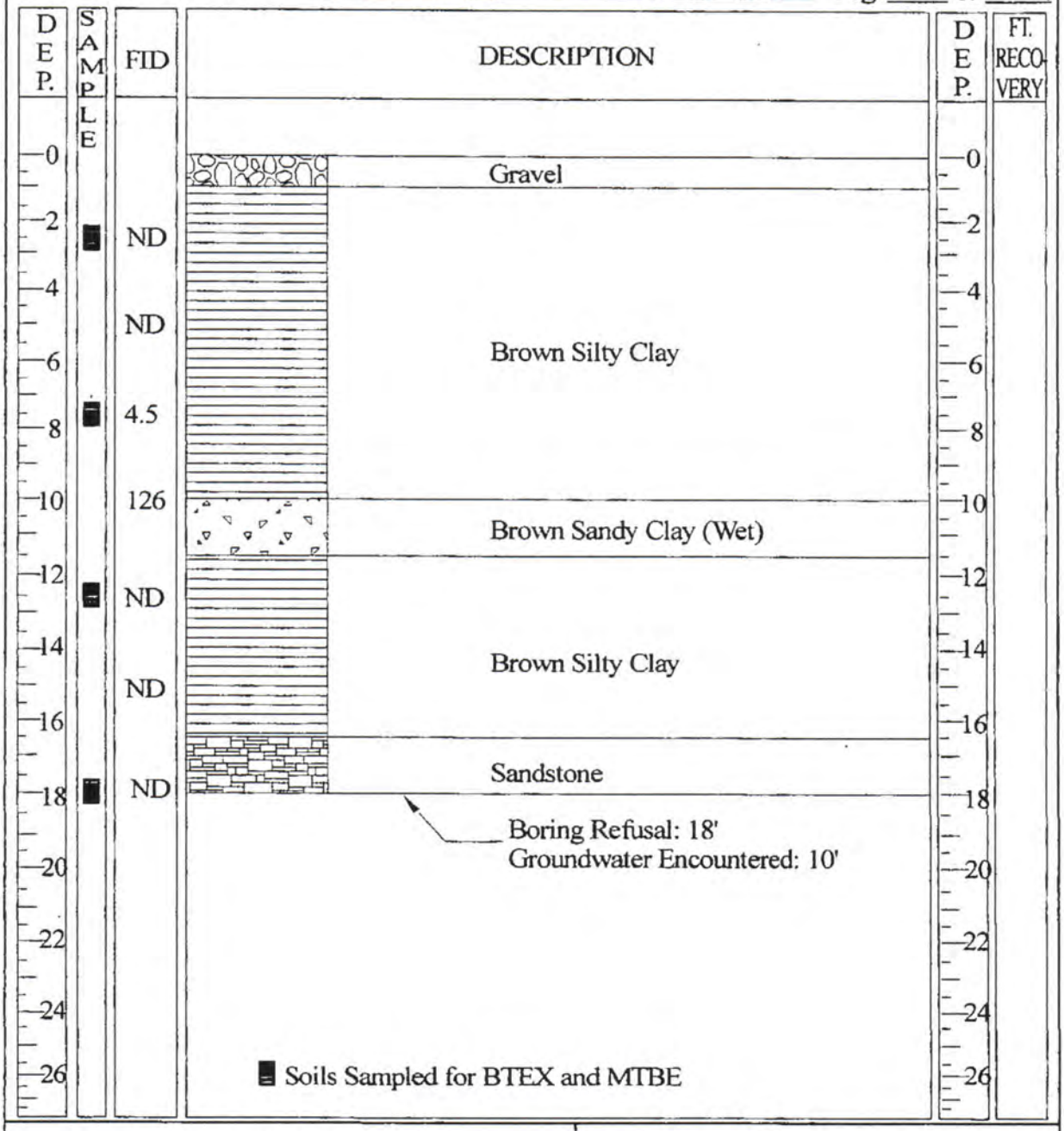
BORING LOG | Applied Environmental Technologies, Inc.

PROJECT: Croslow's Shell - Dersch Energies, Inc. BORING NO.: B-7
LOCATION: Lawrenceville, IL
DATE DRILLED: 10/17/06
DEPTH OF BORING: 18'
WATER INDICATION: 10'
WATER SAMPLE: PRODUCT LAYER:
METHODS: DRILLING: Geoprobe SAMPLING: 2" Continuous
DRILLING CO.: Advanced Environmental Drilling, Inc.
OBSERVATIONS BY: Bryan Williams Page 1 of 1



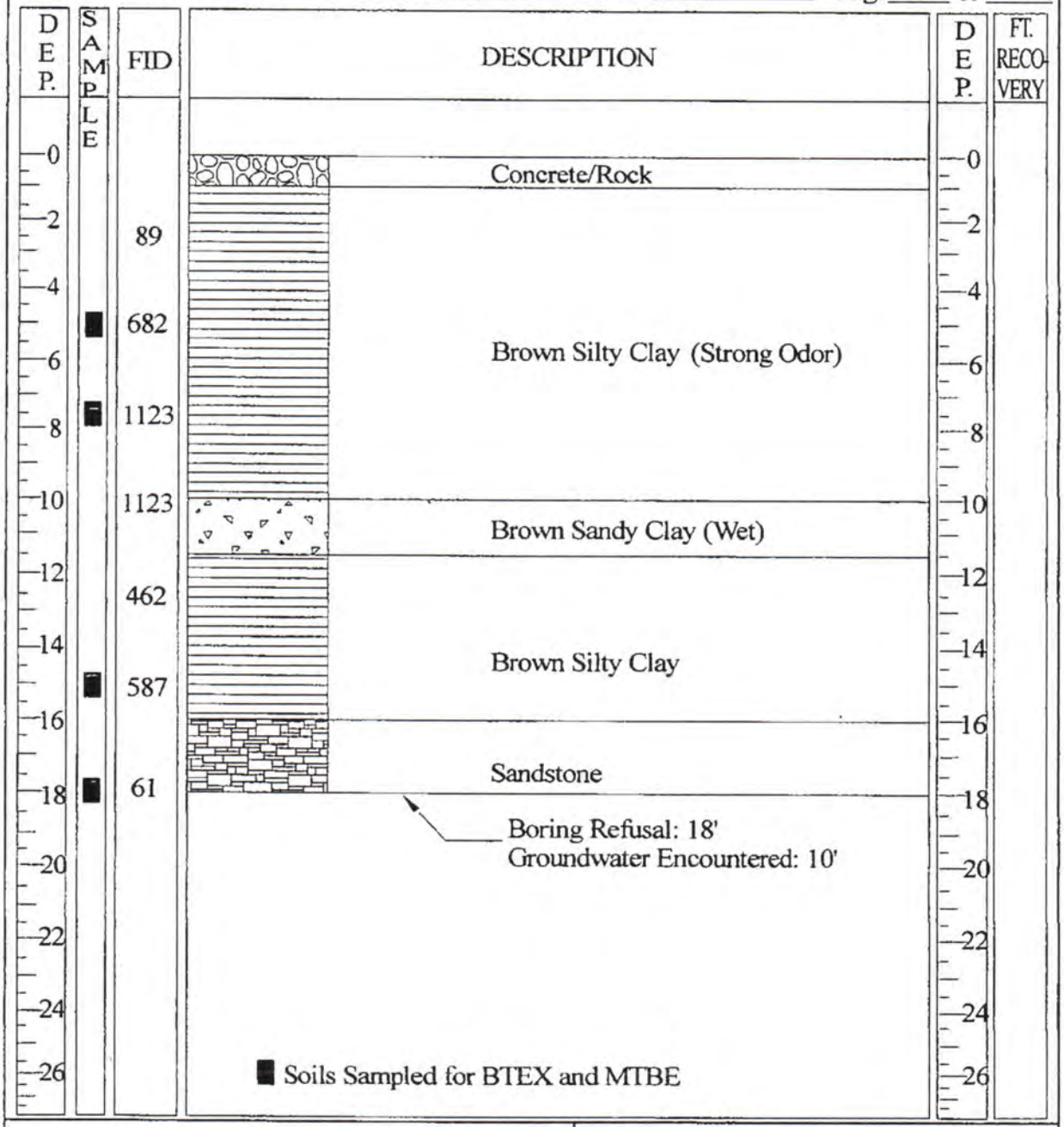
BORING LOG | Applied Environmental Technologies, Inc.

PROJECT: Croslow's Shell - Dersch Energies, Inc. BORING NO.: B-8
LOCATION: Lawrenceville, IL
DATE DRILLED: 10/17/06
DEPTH OF BORING: 18'
WATER INDICATION: 10'
WATER SAMPLE: PRODUCT LAYER:
METHODS: DRILLING: Geoprobe SAMPLING: 2" Continuous
DRILLING CO.: Advanced Environmental Drilling, Inc.
OBSERVATIONS BY: Bryan Williams Page 1 of 1



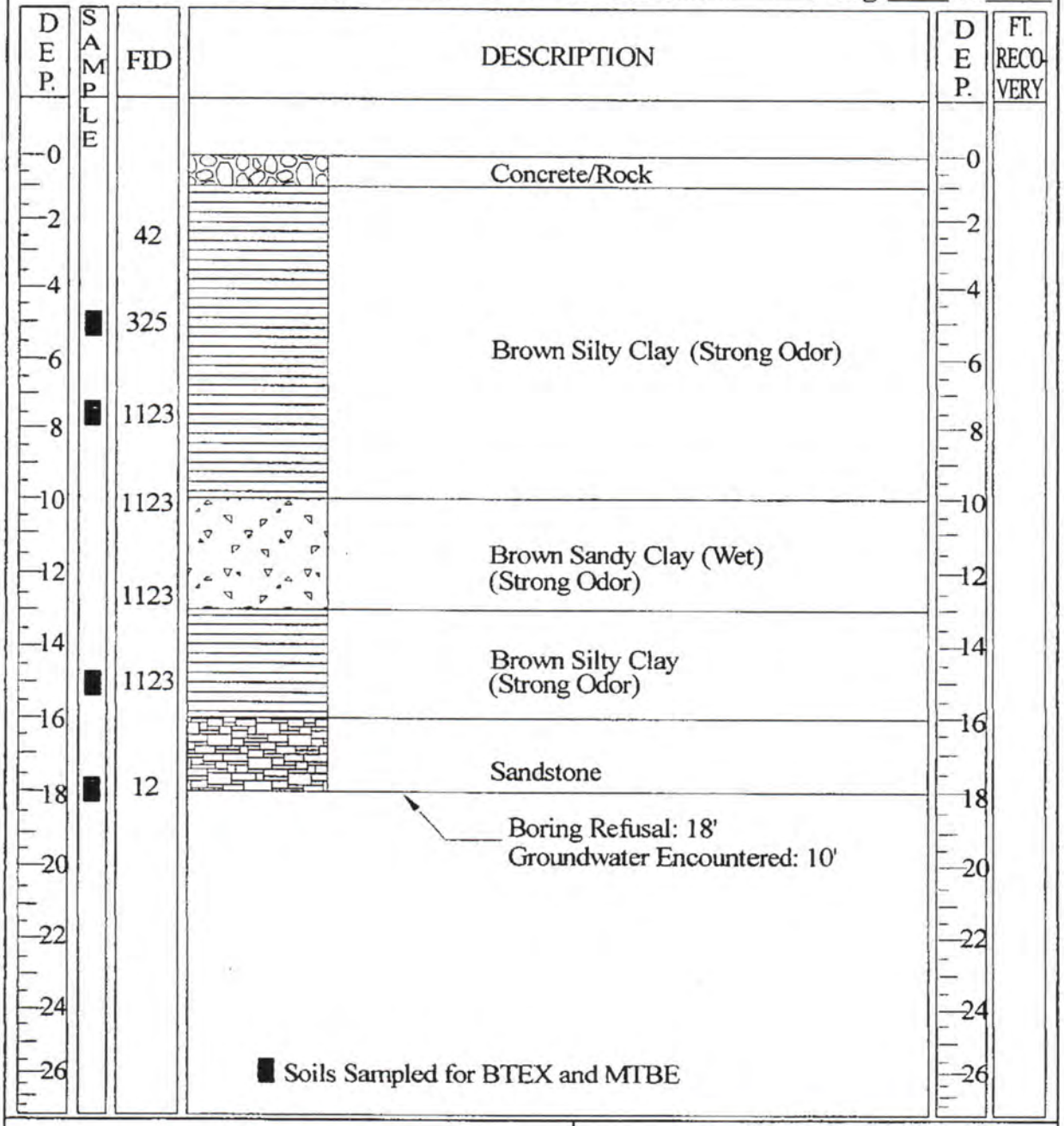
BORING LOG | Applied Environmental Technologies, Inc.

PROJECT: Croslow's Shell - Dersch Energies, Inc. BORING NO.: B-9
LOCATION: Lawrenceville, IL
DATE DRILLED: 10/17/06
DEPTH OF BORING: 18'
WATER INDICATION: 10'
WATER SAMPLE: PRODUCT LAYER:
METHODS: DRILLING: Geoprobe SAMPLING: 2" Continuous
DRILLING CO.: Advanced Environmental Drilling, Inc.
OBSERVATIONS BY: Bryan Williams Page 1 of 1



BORING LOG | Applied Environmental Technologies, Inc.

PROJECT: Croslow's Shell - Dersch Energies, Inc. BORING NO.: B-10
LOCATION: Lawrenceville, IL
DATE DRILLED: 10/17/06
DEPTH OF BORING: 18'
WATER INDICATION: 10'
WATER SAMPLE: PRODUCT LAYER:
METHODS: DRILLING: Geoprobe SAMPLING: 2" Continuous
DRILLING CO.: Advanced Environmental Drilling, Inc.
OBSERVATIONS BY: Bryan Williams Page 1 of 1



BORING LOG | Applied Environmental Technologies, Inc.

Illinois Environmental Protection Agency

CW[illegible]M COMPANY, INC.
DRILLING BOREHOLE LOG

LUST INCIDENT #: 2005-0374	**BOREHOLE NUMBER:** MW-6
SITE NAME: Dersch Croslow Shell Lawrenceville	**BORING LOCATION:** 25'S &98'E of SE corner of Croslows (50'E of MW-1)
SITE ADDRESS: 1421 Lexington Avenue Lawrenceville, Illinois 62439	**RIG TYPE:** Truck mounted drill rig
DATE/TIME STARTED: 3/27/14 12:00	**DRILLING/SAMPLE METHOD:** continuous sampling/hollow stem auger
DATE/TIME FINISHED: 3/27/14 12:50	**BACKFILL:** Installed Monitoring Well

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Asphalt						
1	Gravel Subbase						No Odor or Discoloration Throughout
2	Brown Silty Clay with Fine Grain to Medium Grain Sand	CL	95%	0	Grab	MW6-2.5	BETX, MTBE
3							
4							
5							
6							
7	Brown Mottled Grey Silty Clay	CL					
8			85%	0	Grab	MW6-7.5	BETX, MTBE
9							
10							
11							
12							
13	Brown Mottled Grey Silty Clay with Fine Grained Sand	CL	100%	0	Grab	MW6-12.5	BETX, MTBE
14							
15	End of Boring 15'						

Stratification lines are approximate, in-situ transition between soil types may be gradual.

NOTES: Sampled at 2.5, 7.5, and 12.5 per regulations

Manway / Surface Elevation:	96.94				
Groundwater Depth While Drilling:	~9-11	**Auger Depth:**	15'	**Driller:**	AEDC
Groundwater Depth After Drilling:	93.18	**Rotary Depth:**		**Geologist:**	RJS/BMW

Illinois Environmental Protection Agency

CW[illegible]M COMPANY, INC.
DRILLING BOREHOLE LOG

LUST INCIDENT #: 2005-0374
SITE NAME: Dersch Croslow Shell Lawrenceville
SITE ADDRESS: 1421 Lexington Avenue
Lawrenceville, Illinois 62439
DATE/TIME STARTED: 3/27/14 12:50
DATE/TIME FINISHED: 3/27/14 1:40

BOREHOLE NUMBER: MW-7
BORING LOCATION: 105'S & 21'W of SE Corner of Croslows
RIG TYPE: Truck mounted drill rig
DRILLING/SAMPLE METHOD: continuous sampling/hollow stem auger
BACKFILL: Installed Monitoring Well

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Decorative Gravel						
1	Gravel/Soil subbase						
2	Brown Silty Clay with Fine Grain to Medium Grain Sand	CL					
3			95%	0	Grab	MW7-2.5	BETX, MTBE
4							
5							
6							
7	Brown Mottled Grey Silty Clay	CL					
8			90%	0	Grab	MW7-7.5	BETX, MTBE
9							
10							
11							
12	Grey Mottled Brown Silty Clay with Fine Grain Sand	CL					
13			90%	226	Grab	MW7-12.5	BETX, MTBE Odor and Discoloration 12.5'
14							
15	End of Boring 15'						

Stratification lines are approximate, in-situ transition between soil types may be gradual.

NOTES: Sampled at 2.5, 7.5, and 12.5 per regulations

Manway / Surface Elevation: 98.41

Groundwater Depth While Drilling: ~9-11 **Auger Depth:** 15' **Driller:** AEDC

Groundwater Depth After Drilling: 94.2 **Rotary Depth:** **Geologist:** RJS/BMW

Illinois Environmental Protection Agency

CW[illegible]M COMPANY, INC.
DRILLING BOREHOLE LOG

LUST INCIDENT #: 2005-0374	**BOREHOLE NUMBER:** MW-8
SITE NAME: Dersch Croslow Shell Lawrenceville	**BORING LOCATION:** 35'S &108'W of NW Corner of Croslows
SITE ADDRESS: 1421 Lexington Avenue Lawrenceville, Illinois 62439	**RIG TYPE:** Truck mounted drill rig
DATE/TIME STARTED: 3/27/14 1:40	**DRILLING/SAMPLE METHOD:** continuous sampling/hollow stem auger
DATE/TIME FINISHED: 3/27/14 2:30	**BACKFILL:** Installed Monitoring Well

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Grass						
1	Silt Loam top soil						Slight Odor Throughout
2	Brown Silty Clay with Fine Grain to Medium Grain Sand	CL					
3			90%	16.3	Grab	MW8-2.5	BETX, MTBE
4							
5							
6							
7	Brown Mottled Grey Silty Clay	CL					very soft
8			90%	0	Grab	MW8-7.5	BETX, MTBE
9							
10							
11							
12							
13			90%	0	Grab	MW8-12.5	BETX, MTBE
14							
15	End of Boring 15'						

Stratification lines are approximate, in-situ transition between soil types may be gradual.

NOTES: Sampled at 2.5, 7.5, and 12.5 per regulations

Manway / Surface Elevation:	101.52				
Groundwater Depth While Drilling:	~9-11	**Auger Depth:**	15'	**Driller:**	AEDC
Groundwater Depth After Drilling:	98.27	**Rotary Depth:**		**Geologist:**	RJS /BMW

Illinois Environmental Protection Agency

CW[1]M COMPANY, INC.
DRILLING BOREHOLE LOG

LUST INCIDENT #: 2005-0374	**BOREHOLE NUMBER:** MW-9
SITE NAME: Dersch Croslow Shell Lawrenceville	**BORING LOCATION:** 20'E of NE Corner of Croslows
SITE ADDRESS: 1421 Lexington Avenue Lawrenceville, Illinois 62439	**RIG TYPE:** Truck mounted drill rig
DATE/TIME STARTED: 3/27/14 2:30	**DRILLING/SAMPLE METHOD:** continuous sampling/hollow stem auger
DATE/TIME FINISHED: 3/27/14 3:20	**BACKFILL:** Installed Monitoring Well

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Gravel						
1	Subbase						No Odor & Discoloration
2	Brown Mottled Grey Silty Clay with Fine Grain to Medium Grain Sand	CL	90%	0	Grab	MW9-2.5	BETX, MTBE
3							
4							
5							
6							
7	Brown Mottled Greay Silty Clay	CL					very soft
8			90%	0	Grab	MW9-7.5	BETX, MTBE
9							
10							
11							
12							
13			95%	0	Grab	MW9-12.5	BETX, MTBE
14	Brown Mottled Grey Silty Clay with trace sand	CL					
15	End of Boring 15'						

Stratification lines are approximate, in-situ transition between soil types may be gradual.

NOTES: Sampled at 2.5, 7.5, and 12.5 per regulations

Manway / Surface Elevation:	99.36				
Groundwater Depth While Drilling:	~9-11	**Auger Depth:**	15'	**Driller:**	AEDC
Groundwater Depth After Drilling:	97.74	**Rotary Depth:**		**Geologist:**	RJS / BMW

Illinois Environmental Protection Agency

CW[illegible]M COMPANY, INC.
DRILLING BOREHOLE LOG

LUST INCIDENT #: 2005-0374	**BOREHOLE NUMBER:** SB-1
SITE NAME: Dersch Croslow Shell Lawrenceville	**BORING LOCATION:** 10'S & 20'W of NW Corner of Croslows
SITE ADDRESS: 1421 Lexington Avenue Lawrenceville, Illinois 62439	**RIG TYPE:** Truck mounted drill rig
DATE/TIME STARTED: 3/27/14 3:20	**DRILLING/SAMPLE METHOD:** continuous sampling/hollow stem auger
DATE/TIME FINISHED: 3/27/14 3:50	**BACKFILL:** Installed Monitoring Well

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Concrete						
1	with Gravel Subbase						Slight Odor & Discoloration Throughout
2	Brown Silty Clay with Fine Grain to Medium Grain Sand	CL					
3			75%	2.1	Grab	SB1-2.5	BETX, MTBE
4							
5							
6							
7	Brown Silty Clay	CL					
8			90%	0	Grab	SB1-7.5	BETX, MTBE
9							
10							
11							
12							
13			95%	0	Grab	SB1-12.5	BETX, MTBE
14	Brown Mottled Grey Silty Clay with Fine Grain Sand	CL					
15	End of Boring 15'						

Stratification lines are approximate. in-situ transition between soil types may be gradual.

NOTES: Sampled at 2.5, 7.5, and 12.5 per regulations

Manway / Surface Elevation:

▼	**Groundwater Depth While Drilling:** ~9-11	**Auger Depth:** 15'	**Driller:**	AEDC
▽	**Groundwater Depth After Drilling:**	**Rotary Depth:**	**Geologist:**	RJS / BMW

Applied Environmental Technologies

Well Completion Report

Incident No.: H-20050374
Site Name: Croslow's Shell - Dersch Energies, Inc.
Drilling Contractor: Advanced Environmental Drilling
Driller: Greg Courson
Drilling Method: Hollow Stem Augers

Well No.: MW - 1
Date Drilled Start: 10/17/06
Date Completed: 10/17/06
Geologist: Bryan Williams
Drilling Fluids (type): N/A

Annular Space Details

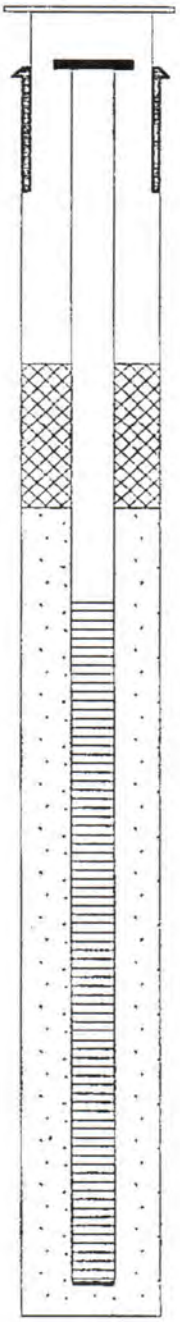
Type of Surface Seal: Concrete
Type of Annular Sealant: Bentonite
Type of Bentonite Seal (Granular, Pellet): Granular
Type of Sand Pack: Silica Sand

Well Construction Materials

	Stainless Steel Specify Type	PVC Specify Type	Other Specify Type
Riser Coupling Joint		Screw	
Riser Pipe Above w.t.		Sched 40 - 2"	
Riser Pipe Below w.t.		Sched 40 - 2"	
Screen		Sched 40 - 2"	
Coupling Joint Screen to Riser		Screw	
Protective Casing			Steel

Measurements

Riser Pipe Length	9.60'
Screen Length	10'
Screen Slot Size	0.010"
Protective Casing Length	1'
Depth to Water	5.47'
Elevation of Water	90.53'
Free Product Thickness	N/A
Gallons Removed (develop)	N/A
Gallons Removed (purge)	8 Gallons
Other	



Elevations - .01 ft.

96.40' Top of Protective Casing
96.00' Top of Riser Pipe
96.40' Ground Surface
95.40' Top of Annular Sealant
N/A Casing Stickup
95.40' Top of Seal
5' Total Seal Interval
90.40' Top of Sand
86.40' Top of Screen
.10' Total Screen Interval
76.40' Bottom of Screen
76.40' Bottom of Borehole

Completed By: Jay Emery

Applied Environmental Technologies

Well Completion Report

Incident No.: H-20050374
Site Name: Croslow's Shell - Dersch Energies, Inc.
Drilling Contractor: Advanced Environmental Drilling
Driller: Greg Courson
Drilling Method: Hollow Stem Augers

Well No.: MW - 2
Date Drilled Start: 10/17/06
Date Completed: 10/17/06
Geologist: Bryan Williams
Drilling Fluids (type): N/A

Annular Space Details

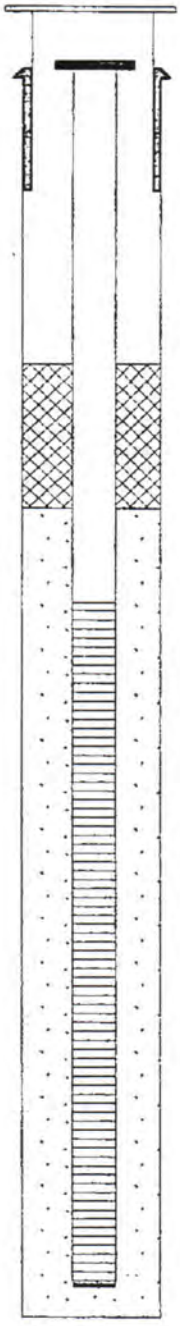
Type of Surface Seal: Concrete
Type of Annular Sealant: Bentonite
Type of Bentonite Seal (Granular, Pellet): Granular
Type of Sand Pack: Silica Sand

Well Construction Materials

	Stainless Steel Specify Type	PVC Specify Type	Other Specify Type
Riser Coupling Joint		Screw	
Riser Pipe Above w.t.		Sched 40 - 2"	
Riser Pipe Below w.t.		Sched 40 - 2"	
Screen		Sched 40 - 2"	
Coupling Joint Screen to Riser		Screw	
Protective Casing			Steel

Measurements

Riser Pipe Length	9.70'
Screen Length	10'
Screen Slot Size	0.010"
Protective Casing Length	1'
Depth to Water	5.96'
Elevation of Water	92.74'
Free Product Thickness	N/A
Gallons Removed (develop)	N/A
Gallons Removed (purge)	8 Gallons
Other	



Elevations - .01 ft.

99.00' Top of Protective Casing
98.70' Top of Riser Pipe
99.00' Ground Surface
98.00' Top of Annular Sealant
N/A Casing Stickup
98.00' Top of Seal
5' Total Seal Interval
93.00' Top of Sand
89.00' Top of Screen
10' Total Screen Interval
79.00' Bottom of Screen
79.00' Bottom of Borehole

Completed By: Jay Emery

Applied Environmental Technologies

Well Completion Report

Incident No.: H-20050374
Site Name: Croslow's Shell - Dersch Energies, Inc.
Drilling Contractor: Advanced Environmental Drilling
Driller: Greg Courson
Drilling Method: Hollow Stem Augers

Well No.: MW - 3
Date Drilled Start: 10/17/06
Date Completed: 10/17/06
Geologist: Bryan Williams
Drilling Fluids (type): N/A

Annular Space Details

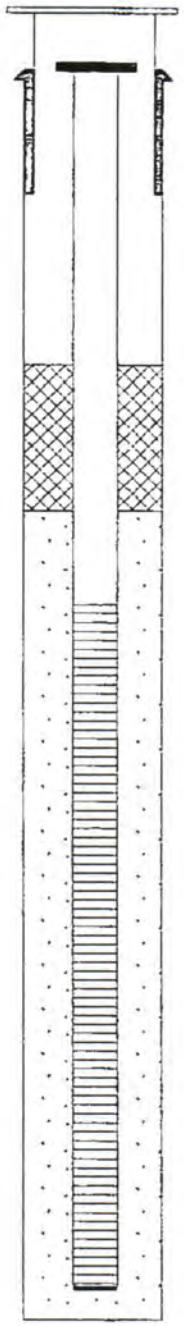
Type of Surface Seal: Concrete
Type of Annular Sealant: Bentonite
Type of Bentonite Seal (Granular, Pellet): Granular
Type of Sand Pack: Silica Sand

Well Construction Materials

	Stainless Steel Specify Type	PVC Specify Type	Other Specify Type
Riser Coupling Joint		Screw	
Riser Pipe Above w.t.		Sched 40 - 2"	
Riser Pipe Below w.t.		Sched 40 - 2"	
Screen		Sched 40 - 2"	
Coupling Joint Screen to Riser		Screw	
Protective Casing			Steel

Measurements

Riser Pipe Length	9.67'
Screen Length	10'
Screen Slot Size	0.010"
Protective Casing Length	1'
Depth to Water	5.68'
Elevation of Water	92.50'
Free Product Thickness	N/A
Gallons Removed (develop)	N/A
Gallons Removed (purge)	8 Gallons
Other	



Elevations - .01 ft.

98.51' Top of Protective Casing
98.18' Top of Riser Pipe
98.51' Ground Surface
97.51' Top of Annular Sealant
N/A Casing Stickup
97.51' Top of Seal
5' Total Seal Interval
92.51' Top of Sand
88.51' Top of Screen
10' Total Screen Interval
78.51' Bottom of Screen
78.51' Bottom of Borehole

Completed By: Jay Emery

Applied Environmental Technologies

Well Completion Report

Incident No.: H-20050374
Site Name: Croslow's Shell - Dersch Energies, Inc.
Drilling Contractor: Advanced Environmental Drilling
Driller: Greg Courson
Drilling Method: Hollow Stem Augers

Well No.: MW - 4
Date Drilled Start: 10/17/06
Date Completed: 10/17/06
Geologist: Bryan Williams
Drilling Fluids (type): N/A

Annular Space Details

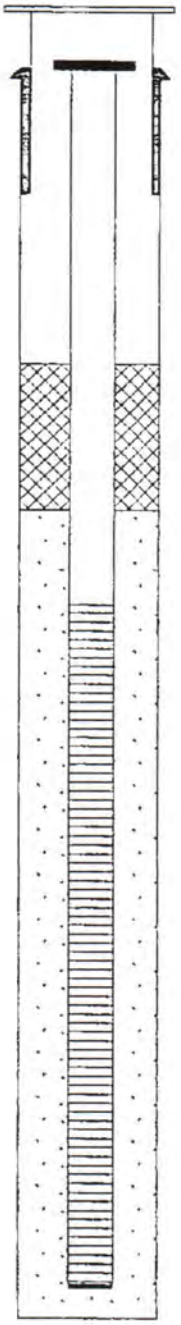
Type of Surface Seal: Concrete
Type of Annular Sealant: Bentonite
Type of Bentonite Seal (Granular, Pellet): Granular
Type of Sand Pack: Silica Sand

Well Construction Materials

	Stainless Steel Specify Type	PVC Specify Type	Other Specify Type
Riser Coupling Joint		Screw	
Riser Pipe Above w.t.		Sched 40 - 2"	
Riser Pipe Below w.t.		Sched 40 - 2"	
Screen		Sched 40 - 2"	
Coupling Joint Screen to Riser		Screw	
Protective Casing			Steel

Measurements

Riser Pipe Length	9.62'
Screen Length	10'
Screen Slot Size	0.010"
Protective Casing Length	1'
Depth to Water	4.02'
Elevation of Water	94.02'
Free Product Thickness	N/A
Gallons Removed (develop)	N/A
Gallons Removed (purge)	8 Gallons
Other	



Elevations - .01 ft.

98.42' Top of Protective Casing
98.04' Top of Riser Pipe
98.42' Ground Surface
97.42' Top of Annular Sealant
N/A Casing Stickup
97.42' Top of Seal
5' Total Seal Interval
92.42' Top of Sand
88.42' Top of Screen
10' Total Screen Interval
78.42' Bottom of Screen
78.42' Bottom of Borehole

Completed By: Jay Emery

Applied Environmental Technologies

Well Completion Report

Incident No.: H-20050374
Site Name: Croslow's Shell - Dersch Energies, Inc.
Drilling Contractor: Advanced Environmental Drilling
Driller: Greg Courson
Drilling Method: Hollow Stem Augers

Well No.: MW - 5
Date Drilled Start: 10/17/06
Date Completed: 10/17/06
Geologist: Bryan Williams
Drilling Fluids (type): N/A

Annular Space Details

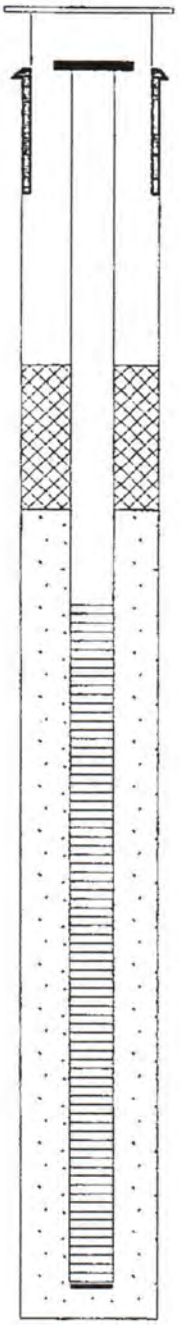
Type of Surface Seal: Concrete
Type of Annular Sealant: Bentonite
Type of Bentonite Seal (Granular, Pellet): Granular
Type of Sand Pack: Silica Sand

Well Construction Materials

	Stainless Steel Specify Type	PVC Specify Type	Other Specify Type
Riser Coupling Joint		Screw	
Riser Pipe Above w.t.		Sched 40 - 2"	
Riser Pipe Below w.t.		Sched 40 - 2"	
Screen		Sched 40 - 2"	
Coupling Joint Screen to Riser		Screw	
Protective Casing			Steel

Measurements

Riser Pipe Length	9.60'
Screen Length	10'
Screen Slot Size	0.010"
Protective Casing Length	1'
Depth to Water	5.13'
Elevation of Water	91.13'
Free Product Thickness	N/A
Gallons Removed (develop)	N/A
Gallons Removed (purge)	8 Gallons
Other	



Elevations - .01 ft.

96.66' Top of Protective Casing
96.26' Top of Riser Pipe
96.66' Ground Surface
95.66' Top of Annular Sealant
N/A Casing Stickup
95.66' Top of Seal
5' Total Seal Interval
90.66' Top of Sand
86.66' Top of Screen
10' Total Screen Interval
76.66' Bottom of Screen
76.66' Bottom of Borehole

Completed By: Jay Emery

Illinois Environmental Protection Agency — **LUST Well Completion Report**

Incident No.	2005-0374	**Well No.**	MW-6
Site Name	Dersch Lawrenceville	**Date Drilled**	3/27/2014
Drilling Contractor	CW^3M	**Date Completed**	3/27/2014
Driller	CW^3M	**Geologist**	RJS/BMW
Drilling Method	Hollow Stem Auger	**Drilling Fluids**	N/A

Annular Space Details

Type of Surface Seal	Concrete
Type of Annular Sealant	Bentonite
Type of Bentonite	High-Yield
Type of Sand Pack	Coarse 20-20

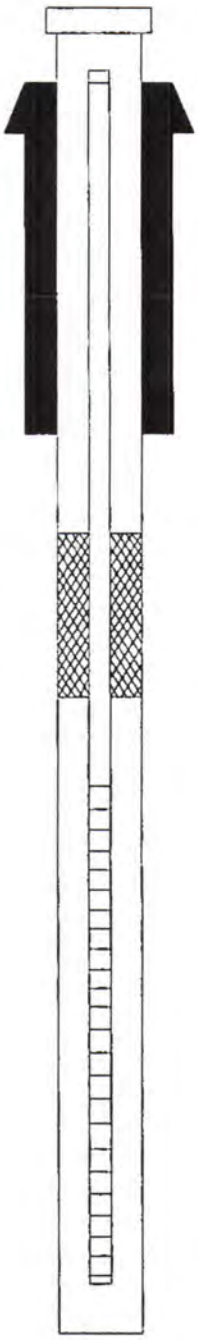
Well Construction Materials

	Stainless Steel Type	PVC Specify Type	Other Specify Type
Riser Coupling Joint			
Riser Pipe Above w.t.		Sched.-40	
Riser Pipe Below w.t.			
Screen		Sched.-40	
Coupling Joint Screen to Riser		Sched.-40	
Protective Casing			Steel

Measurements

Riser Pipe Length	4.25 ft.
Screen Length	10.0 ft.
Screen Slot Size	10-slot
Protective Casing Length	N/A
Depth to Water	~9-11 ft. while drilling
Depth to Water	93.18 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	Approximately 3 gallons
Gallons removed (purge)	Approximately 3 gallons
Other	

Completed by: BMW



	Top of Protective
96.94 ft.	Casing
96.69 ft.	Top of riser pipe
96.94 ft.	Ground surface
	Top of Annular
96.44 ft.	Sealant
N/A	Casing Stickup
96.44 ft.	Top of Seal
3.00 ft.	Total Seal interval
93.44 ft.	Top of Sand
92.44 ft.	Top of Screen
	Total Screen
10.0 ft.	Interval
	Bottom of
82.44 ft.	Screen
	Bottom of
81.94 ft.	Borehole

Illinois Environmental Protection Agency — **LUST Well Completion Report**

Incident No.	2005-0374	**Well No.**	MW-7
Site Name	Dersch Lawrenceville	**Date Drilled**	3/27/2014
Drilling Contractor	CW^3M	**Date Completed**	3/27/2014
Driller	CW^3M	**Geologist**	RJS/BMW
Drilling Method	Hollow Stem Auger	**Drilling Fluids**	N/A

Annular Space Details

Type of Surface Seal	Concrete
Type of Annular Sealant	Bentonite
Type of Bentonite	High-Yield
Type of Sand Pack	Coarse 20-20

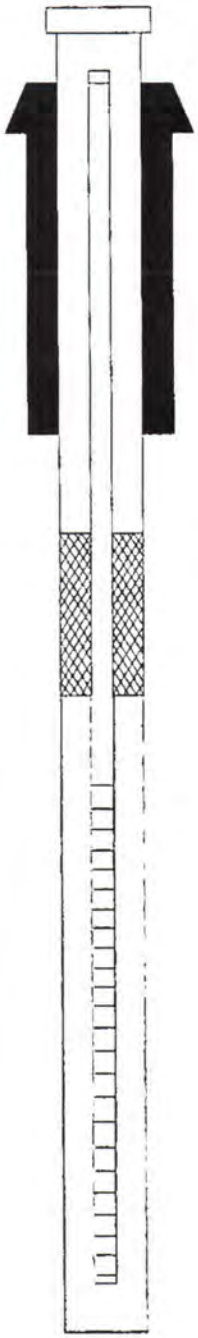
Well Construction Materials

	Stainless Steel Type	PVC Specify Type	Other Specify Type
Riser Coupling Joint			
Riser Pipe Above w.t.		Sched.-40	
Riser Pipe Below w.t.			
Screen		Sched.-40	
Coupling Joint Screen to Riser		Sched.-40	
Protective Casing			Steel

Measurements

Riser Pipe Length	4.25 ft.
Screen Length	10.0 ft.
Screen Slot Size	10-slot
Protective Casing Length	N/A
Depth to Water	~9-11 ft. while drilling
Depth to Water	94.20 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	Approximately 3 gallons
Gallons removed (purge)	Approximately 3 gallons
Other	

Completed by: BMW



98.41 ft.	Top of Protective Casing
98.16 ft.	Top of riser pipe
98.41 ft.	Ground surface
97.91 ft.	Top of Annular Sealant
N/A	Casing Stickup
97.91 ft.	Top of Seal
3.00 ft.	Total Seal interval
94.91 ft.	Top of Sand
93.91 ft.	Top of Screen
10.0 ft.	Total Screen Interval
83.91 ft.	Bottom of Screen
83.41 ft.	Bottom of Borehole

Illinois Environmental Protection Agency — **LUST Well Completion Report**

Incident No.	2005-0374	**Well No.**	MW-8
Site Name	Dersch Lawrenceville	**Date Drilled**	3/27/2014
Drilling Contractor	CW^{3}M	**Date Completed**	3/27/2014
Driller	CW^{3}M	**Geologist**	RJS/BMW
Drilling Method	Hollow Stem Auger	**Drilling Fluids**	N/A

Annular Space Details

Type of Surface Seal	Concrete
Type of Annular Sealant	Bentonite
Type of Bentonite	High-Yield
Type of Sand Pack	Coarse 20-20

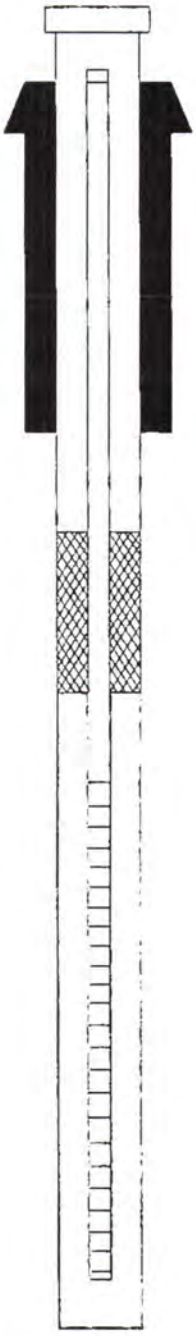
Well Construction Materials

	Stainless Steel Type	PVC Specify Type	Other Specify Type
Riser Coupling Joint			
Riser Pipe Above w.t.		Sched.-40	
Riser Pipe Below w.t.			
Screen		Sched.-40	
Coupling Joint Screen to Riser		Sched.-40	
Protective Casing			Steel

Measurements

Riser Pipe Length	4.25 ft.
Screen Length	10.0 ft.
Screen Slot Size	10-slot
Protective Casing Length	N/A
Depth to Water	~9-11 ft. while drilling
Depth to Water	98.27 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	Approximately 3 gallons
Gallons removed (purge)	Approximately 3 gallons
Other	

Completed by: BMW



101.52 ft.	Top of Protective Casing
101.27 ft.	Top of riser pipe
101.52 ft.	Ground surface
101.02 ft.	Top of Annular Sealant
N/A	Casing Stickup
101.02 ft.	Top of Seal
3.00 ft.	Total Seal interval
98.02 ft.	Top of Sand
97.02 ft.	Top of Screen
10.0 ft.	Total Screen Interval
87.02 ft.	Bottom of Screen
86.52 ft.	Bottom of Borehole

Illinois Environmental Protection Agency — **LUST Well Completion Report**

Incident No.	2005-0374	**Well No.**	MW-9
Site Name	Dersch Lawrenceville	**Date Drilled**	3/27/2014
Drilling Contractor	CW^3M	**Date Completed**	3/27/2014
Driller	CW^3M	**Geologist**	RJS/BMW
Drilling Method	Hollow Stem Auger	**Drilling Fluids**	N/A

Annular Space Details

Type of Surface Seal	Concrete
Type of Annular Sealant	Bentonite
Type of Bentonite	High-Yield
Type of Sand Pack	Coarse 20-20

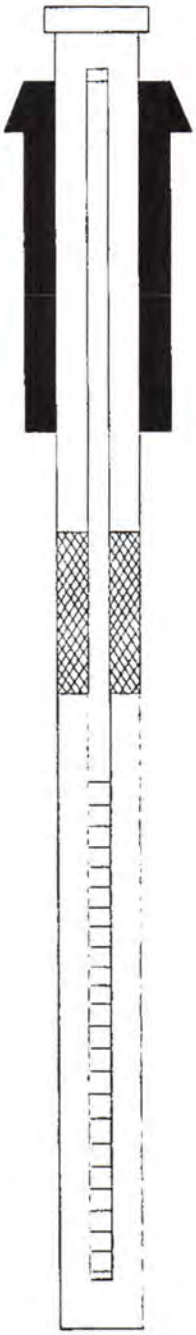
Well Construction Materials

	Stainless Steel Type	PVC Specify Type	Other Specify Type
Riser Coupling Joint			
Riser Pipe Above w.t.		Sched.-40	
Riser Pipe Below w.t.			
Screen		Sched.-40	
Coupling Joint Screen to Riser		Sched.-40	
Protective Casing			Steel

Measurements

Riser Pipe Length	4.25 ft.
Screen Length	10.0 ft.
Screen Slot Size	10-slot
Protective Casing Length	N/A
Depth to Water	~9-11 ft. while drilling
Depth to Water	97.74 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	Approximately 3 gallons
Gallons removed (purge)	Approximately 3 gallons
Other	

Completed by: BMW

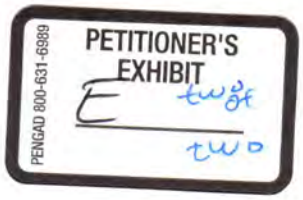


99.36	ft.	Top of Protective Casing
99.11	ft.	Top of riser pipe
99.36	ft.	Ground surface
98.86	ft.	Top of Annular Sealant
N/A		Casing Stickup
98.86	ft.	Top of Seal
3.00	ft.	Total Seal interval
95.86	ft.	Top of Sand
94.86	ft.	Top of Screen
10.0	ft.	Total Screen Interval
84.86	ft.	Bottom of Screen
84.36	ft.	Bottom of Borehole

APPENDIX E

ANALYTICAL RESULTS

SITE INVESTIGATION COMPLETION REPORT
DERSCH CROSLOWS
LAWRENCEVILLE, ILLINOIS



Croslow's Shell
UST Removal Samples
Collected May 5, 2005

Analyte	Cleanup objectives	No. 1 W Wall S 8ft	No. 2 W Wall N 8ft	No. 3 N Wall W 7ft	No. 4 N Wall E 7ft	No. 5 E Wall N 8ft	No. 6 E Wall S 8ft	No. 7 S Wall E 6ft	No. 8 S Wall W 8ft	No. 9 SW Floor 12ft	No. 10 NW Floor 11ft
Date Sampled		5/5/2005	5/5/2005	5/5/2005	5/5/2005	5/5/2005	5/5/2005	5/5/2005	5/5/2005	5/5/2005	5/5/2005
BTEX											
Benzene	0.03	0.012	0.0087	0.0056	0.0028	0.013	**0.15**	**0.1**	**0.031**	**0.08**	**0.48**
Toluene	12	0.0078	0.011	0.019	0.007	<0.0063	0.62	<0.51	<0.24	<0.0062	<1.2
Ethylbenzene	13	0.002	0.0031	0.0078	0.0028	0.0022	0.7	<0.051	<0.024	0.0044	3.2
Total Xylene	150	0.019	0.012	0.04	0.0055	0.0098	3	0.44	0.09	0.012	7.9
MTBE	0.32	0.039	0.035	0.017	0.0013	0.005	<0.10	<0.10	0.079	0.075	<0.24
PNA's											
Anthracene	12,000	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040
Acenaphthene	570	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040
Acenaphthylene	30	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040
Benzo (a) anthracene	2	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040
Benzo (a) pyrene	0.8	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040
Benzo (b) fluoranthene	5	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040
Benzo (g,h,i) perylene	2,300	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040
Benzo (k) fluoranthene	49	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040
Chrysene	160	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040
Dibenzo (a,h) anthracene	0.8	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040
Fluoranthene	4,300	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040
Fluorene	560	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040
Indeno (1,2,3,-cd) pyrene	8	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040
Napthalene	12	<0.041	<0.041	<0.041	<0.041	<0.041	0.35	0.044	<0.041	<0.041	1.1
Phenanthrene		<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040
Pyrene	4,200	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.041	<0.040

Tier I Soil Remediation Objectives for Commerical/Industrial Property
All results given in mg/kg. Bold entries exceed cleanup objectives.

Croslow's Shell
UST Removal Samples
Collected May 5, 2005

Analyte	Cleanup objectives	No. 11 SE Floor 11.5ft	No. 12 NE Floor 11.5ft	No. 13 Diesel Fill 11ft	No. 14 Dispenser 1 2ft	No. 15 Dispenser 2 2ft	No. 16 Dispenser 3 2ft	No.17 Dispenser 4 2ft			
Date Sampled		5/5/2005	5/5/2005	5/5/2005	5/5/2005	5/5/2005	5/5/2005	5/5/2005			
BTEX											
Benzene	0.03	0.12	0.16	1.5	0.065	0.024	0.073	0.062			
Toluene	12	<0.24	<0.26	<2.4	<0.56	<0.0063	<0.29	0.021			
Ethylbenzene	13	0.058	0.062	<0.24	<0.056	0.0024	<0.029	0.0014			
Total Xylene	150	0.15	0.16	<0.72	<0.17	<0.0019	<0.088	0.0065			
MTBE	0.32	0.068	<0.052	<0.48	<0.11	0.014	<0.058	0.015			
PNA's											
Anthracene	12,000	<0.042	<0.042	<0.041		<0.042					
Acenaphthene	570	<0.042	<0.042	<0.041		<0.042					
Acenaphthylene	30	<0.042	<0.042	<0.041		<0.042					
Benzo (a) anthracene	2	<0.042	<0.042	<0.041		<0.042					
Benzo (a) pyrene	0.8	<0.042	<0.042	<0.041		<0.042					
Benzo (b) fluoranthene	5	<0.042	<0.042	<0.041		<0.042					
Benzo (g,h,i) perylene	2,300	<0.042	<0.042	<0.041		<0.042					
Benzo (k) fluoranthene	49	<0.042	<0.042	<0.041		<0.042					
Chrysene	160	<0.042	<0.042	<0.041		<0.042					
Dibenzo (a,h) anthracene	0.8	<0.042	<0.042	<0.041		<0.042					
Fluoranthene	4,300	<0.042	<0.042	<0.041		<0.042					
Fluorene	560	<0.042	<0.042	<0.041		<0.042					
Indeno (1,2,3,-cd) pyrene	8	<0.042	<0.042	<0.041		<0.042					
Napthalene	12	<0.042	0.076	<0.041		<0.042					
Phenanthrene		<0.042	<0.042	<0.041		<0.042					
Pyrene	4,200	<0.042	<0.042	<0.041		<0.042					

Tier I Soil Remediation Objectives for Commerical/Industrial Property
All results given in mg/kg. Bold entries exceed cleanup objectives.

Analytical Summary
Croslow's Shell
Dersch Energies, Inc.
Lawrenceville, IL

Results of Soil Sample Analyses for BTEX and MTBE

Analyte	Ingestion Objective	Inhalation Objective	Migration to GW Objective	B-1 2.5 Feet	B-1 10 Feet	B-1 13 Feet	B-1 19 Feet	
Date Sampled				10/17/06	10/17/06	10/17/06	10/17/06	
BTEX								
Benzene	**12**	**0.8**	**0.03**	<0.00063	0.0066	**0.16**	<0.00058	
Toluene	**16000**	**650**	**12**	<0.0063	0.0082	0.13	<0.0058	
Ethylbenzene	**7800**	**400**	**13**	<0.00063	0.0029	0.014	<0.00058	
Xylenes (total)	**160000**	**320**	**150**	<0.0019	0.0067	0.088	<0.0017	
MTBE	**20000**	**8.8**	**0.32**	<0.0012	0.0038	0.097	<0.0012	

All concentrations given in mg/kg. Bold entries exceed IEPA TACO Tier 1 Residential Cleanup Objectives

Results of Soil Sample Analyses for BTEX and MTBE

Analyte	Ingestion Objective	Inhalation Objective	Migration to GW Objective	B-2 2.5 Feet	B-2 7.5 Feet	B-2 12.5 Feet	B-2 17.5 Feet	
Date Sampled				10/17/06	10/17/06	10/17/06	10/17/06	
BTEX								
Benzene	**12**	**0.8**	**0.03**	0.0017	0.0066	<0.00061	<0.006	
Toluene	**16000**	**650**	**12**	<0.0061	0.011	<0.0061	<0.006	
Ethylbenzene	**7800**	**400**	**13**	<0.00061	0.004	<0.00061	<0.0006	
Xylenes (total)	**160000**	**320**	**150**	<0.0018	0.0081	<0.0018	<0.0018	
MTBE	**20000**	**8.8**	**0.32**	0.0017	0.0031	0.003	0.0028	

All concentrations given in mg/kg. Bold entries exceed IEPA TACO Tier 1 Residential Cleanup Objectives

Results of Soil Sample Analyses for BTEX and MTBE

Analyte	Ingestion Objective	Inhalation Objective	Migration to GW Objective	B-3 2.5 Feet	B-3 7.5 Feet	B-3 12.5 Feet	B-3 17.5 Feet	
Date Sampled				10/17/06	10/17/06	10/17/06	10/17/06	
BTEX								
Benzene	**12**	**0.8**	**0.03**	0.008	**0.8**	**0.13**	0.0038	
Toluene	**16000**	**650**	**12**	0.0096	0.9	0.026	<0.0062	
Ethylbenzene	**7800**	**400**	**13**	0.00068	0.35	0.012	<0.00062	
Xylenes (total)	**160000**	**320**	**150**	0.014	0.83	0.021	<0.0019	
MTBE	**20000**	**8.8**	**0.32**	0.0043	0.26	0.066	0.022	

All concentrations given in mg/kg. Bold entries exceed IEPA TACO Tier 1 Residential Cleanup Objectives

Analytical Summary
Croslow's Shell
Dersch Energies, Inc.
Lawrenceville, IL

Results of Soil Sample Analyses for BTEX and MTBE

Analyte	Ingestion Objective	Inhalation Objective	Migration to GW Objective	B-4 2.5 Feet	B-4 7.5 Feet	B-4 13 Feet	B-4 18 Feet	
Date Sampled				10/17/06	10/17/06	10/17/06	10/17/06	
BTEX								
Benzene	**12**	**0.8**	**0.03**	0.022	**4.7**	**0.082**	<0.00058	
Toluene	**16000**	**650**	**12**	0.014	3.4	0.038	<0.0058	
Ethylbenzene	**7800**	**400**	**13**	0.0043	3.1	0.037	0.00064	
Xylenes (total)	**160000**	**320**	**150**	0.017	3.8	0.054	<0.0018	
MTBE	**20000**	**8.8**	**0.32**	0.012	**1.2**	0.073	0.094	

All concentrations given in mg/kg. Bold entries exceed IEPA TACO Tier 1 Residential Cleanup Objectives

Results of Soil Sample Analyses for BTEX and MTBE

Analyte	Ingestion Objective	Inhalation Objective	Migration to GW Objective	B-5 5 Feet	B-5 7.5 Feet	B-5 12.5 Feet	B-5 18 Feet	
Date Sampled				10/17/06	10/17/06	10/17/06	10/17/06	
BTEX								
Benzene	**12**	**0.8**	**0.03**	**1.2**	**3.4**	**0.84**	0.00062	
Toluene	**16000**	**650**	**12**	2.4	3.6	<0.24	<0.0062	
Ethylbenzene	**7800**	**400**	**13**	5.3	**22**	1.6	0.00071	
Xylenes (total)	**160000**	**320**	**150**	2.9	64	0.28	0.0027	
MTBE	**20000**	**8.8**	**0.32**	**0.35**	**2**	0.13	0.015	

All concentrations given in mg/kg. Bold entries exceed IEPA TACO Tier 1 Residential Cleanup Objectives

Results of Soil Sample Analyses for BTEX and MTBE

Analyte	Ingestion Objective	Inhalation Objective	Migration to GW Objective	B-6 5 Feet	B-6 7.5 Feet	B-6 15 Feet	B-6 18 Feet	
Date Sampled				10/17/06	10/17/06	10/17/06	10/17/06	
BTEX								
Benzene	**12**	**0.8**	**0.03**	**0.038**	**5.2**	**0.047**	0.017	
Toluene	**16000**	**650**	**12**	0.034	5	<0.0062	0.0098	
Ethylbenzene	**7800**	**400**	**13**	0.016	**21**	0.0082	0.0025	
Xylenes (total)	**160000**	**320**	**150**	0.051	10	0.0058	0.007	
MTBE	**20000**	**8.8**	**0.32**	0.018	**1.9**	0.048	0.026	
TOC								

All concentrations given in mg/kg. Bold entries exceed IEPA TACO Tier 1 Residential Cleanup Objectives

Analytical Summary
Croslow's Shell
Dersch Energies, Inc.
Lawrenceville, IL

Results of Soil Sample Analyses for BTEX and MTBE

Analyte	Ingestion Objective	Inhalation Objective	Migration to GW Objective	B-10 5 Feet	B-10 10 Feet	B-10 15 Feet	B-10 18 Feet	
Date Sampled				10/17/06	10/17/06	10/17/06	10/17/06	
BTEX								
Benzene	**12**	**0.8**	**0.03**	**0.042**	**0.099**	**0.51**	0.011	
Toluene	**16000**	**650**	**12**	0.018	0.072	0.32	<0.0058	
Ethylbenzene	**7800**	**400**	**13**	0.0037	0.036	2.2	0.0053	
Xylenes (total)	**160000**	**320**	**150**	0.018	0.15	0.15	0.0052	
MTBE	**20000**	**8.8**	**0.32**	0.015	0.045	0.28	0.011	

All concentrations given in mg/kg. Bold entries exceed IEPA TACO Tier 1 Residential Cleanup Objectives

Analytical Summary Table
Dersch Energies, Inc.
Croslow Shell
Lawrenceville, IL

Analyte	Class 1 GW Objectives	MW-1	MW-2	MW-3	MW-4	MW-5
Date Sampled		10/24/2006	10/24/2006	10/24/2006	10/24/2006	10/24/2006
BTEX						
Benzene	**0.005**	**0.038**	<0.0005	**0.24**	**0.065**	**1**
Toluene	**1.0**	<0.025	<0.005	<0.05	<0.12	<0.5
Ethylbenzene	**0.7**	0.004	<0.0005	0.062	0.11	**3.1**
Total Xylene	**10.0**	<0.0075	<0.0015	<0.015	<0.038	3.5
MTBE	**0.07**	0.023	0.013	**0.21**	**0.26**	**0.16**
PNA's						
Anthracene	**2.1**	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001
Acenaphthene	**0.42**	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001
Acenaphthylene		<0.0001	<0.0001	<0.0001	<0.0001	<0.0001
Benzo (a) anthracene	**0.00013**	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001
Benzo (a) pyrene	**0.0002**	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001
Benzo (b) fluoranthene	**0.00018**	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001
Benzo (g,h,i) perylene		<0.0001	<0.0001	<0.0001	<0.0001	<0.0001
Benzo (k) fluoranthene	**0.00017**	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001
Chrysene	**0.0015**	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001
Dibenzo (a,h) anthracene	**0.0003**	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001
Fluoranthene	**0.28**	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001
Fluorene	**0.28**	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001
Indeno (1,2,3,-cd) pyrene	**0.00043**	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001
1-Methylnaphthalene		0.017	<0.0001	0.076	0.076	0.23
2-Methylnaphthalene		0.014	<0.0001	0.12	0.072	0.29
Naphthalene	**0.14**	0.0055	<0.0001	0.046	0.078	**0.44**
Phenanthrene		<0.0001	<0.0001	<0.0001	<0.0001	<0.0001
Pyrene	**0.21**	<0.0001	<0.0001	<0.0001	<0.0001	<0.0001

Petroleum Cleanup Objectives for Groundwater (TACO Tier 1 Class 1).
All results given in mg/l. Bold entries exceed cleanup objectives.

Dersch Energies, Inc.
Lawrenceville, Illinois
Corrective Action Data

CWM SOIL 3-27-14

	Location	MW6	MW6	MW6	MW7	MW7	MW7	MW8	MW8	MW8	MW9	MW9	MW9	SB1	SB1	SB1
	Depth (ft)	2.5	7.5	12.5	2.5	7.5	12.5	2.5	7.5	12.5	2.5	7.5	12.5	2.5	7.5	12.5
	Date	3/27/2014	3/27/2014	3/27/2014	3/27/2014	3/27/2014	3/27/2014	3/27/2014	3/27/2014	3/27/2014	3/27/2014	3/27/2014	3/27/2014	3/27/2014	3/27/2014	3/27/2014
Parameter	Class I CUO															
Benzene	0.03	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002
Ethylbenzene	13.0	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002
Toluene	12.0	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002
Total Xylenes	5.6	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
MTBE	0.32	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005

Dersch Energies, Inc.
Lawrenceville, Illinois
Corrective Action Data

CWM GW 4-4-14

	Location	MW6	MW7	MW8	MW9	
	Date	4/4/2014	4/4/2014	4/4/2014	4/4/2014	
Parameter	Class I CUO					
Benzene	**0.005**	<0.002	<0.002	<0.002	<0.002	
Ethylbenzene	**0.7**	<0.002	<0.002	<0.002	0.002	
Toluene	**1.0**	0.003	0.011	0.003	0.018	
Total Xylenes	**10.0**	0.007	0.022	0.01	0.032	
MTBE	**0.07**	<0.005	<0.005	<0.005	<0.005	

SUBURBAN LABORATORIES, Inc.

INVOICE

FEIN # 36-2695636

1950 S. Batavia Ave., Suite 150 Geneva, Illinois 60134
Tel. (708) 544-3260 • Toll Free (800) 783-LABS
Fax (708) 544-8587
www.suburbanlabs.com

Remit To: Suburban Laboratories, Inc.
1950 S. Batavia Ave., Suite 150
Geneva, IL 60134
Phone: 708-544-3260 Fax: 708-544-8587

Invoice#: **111239**
Invoice Date: **4/8/2014**

Terms: NET90
Invoice Due: 7/7/2014

Carol Rowe
ACCOUNTS PAYABLE
CWM Company, Inc
701 West South Grand
Springfield, IL 62704

Priority: Rush
PO:
Report To: Carol Rowe
Fax: (217) 522-8009

Work Order: **1404010** Date Received: 4/1/2014 Project: Dersch - Crostows - Lawrenceville

Item Description	Matrix	Remarks	Qty	Unit Price	% Disc.	Net Price	Total
BTEX + MTBE Solid	Soil	July 2012 - June 2013	15	$99.45			$1,491.75

Miscellaneous Charge Summary

Item	*Unit*	*Qty*	*Total*
Shipping & Handling	$58.50	1	$58.50
5035 Sampling Kit	$11.70	15	$175.50

Sub Total:	$1,491.75
Misc. Charges:	$234.00
Surcharge:	0.00%
INVOICE Total:	**$1,725.75**
Pre-Paid Amount:	$0.00
Total Payable Amount:	**$1,725.75**

Comments: Terms per signed agreement

RECEIVED
APR - 8 2014
BY: CR

Illinois Department of Public Health Accredited #17585

Illinois Environmental Protection Agency Accredited #100225

SUBURBAN LABORATORIES, Inc.

1950 S. Batavia Ave., Suite 150 Geneva, Illinois 60134
Tel. (708) 544-3260 • Toll Free (800) 783-LABS
Fax (708) 544-8587
www.suburbanlabs.com

April 08, 2014

Carol Rowe
CWM Company, Inc
701 West South Grand
Springfield, IL 62704

TEL: (217) 522-8001
FAX: (217) 522-8009

Workorder: 1404010

RE: Dersch - Crostows - Lawrenceville

Dear Carol Rowe:

Suburban Laboratories, Inc. received 15 sample(s) on 4/1/2014 for the analyses presented in the following report.

All data for the associated quality control (QC) met EPA, method, or internal laboratory specifications except where noted in the case narrative. If you are comparing these results to external QC specifications or compliance limits and have any questions, please contact us.

This final report of laboratory analysis consists of this cover letter, case narrative, analytical report, dates report, and any accompanying documentation on, but not limited to, chain of custody records, raw data, and letters of explanation or reliance. This report may not be reproduced, except in full, without the prior written approval of Suburban Laboratories, Inc.

If you have any questions regarding these test results, please call me at (708) 544-3260.

Sincerely,

Kelly Culhane

Kelly Culhane
Project Manager
708-544-3260 ext 212
kelly@suburbanlabs.com

Suburban Laboratories, Inc.
1950 S. Batavia Ave., Suite 150, Geneva, IL 60134 (708) 544-3260

Case Narrative

Client: CWM Company, Inc
Project: Dersch - Crostows - Lawrenceville
WorkOrder: 1404010
Temperature of samples upon receipt at SLI: 2 C

Date: April 08, 2014
PO #:
QC Level:
Chain of Custody #: 111248, 111249

General Comments:
- All results reported in wet weight unless otherwise indicated. (dry = Dry Weight)
- Sample results relate only to the analytes of interest tested and to sample as received by the laboratory.
- Environmental compliance sample results meet the requirements of 35 IAC Part 186 unless otherwise indicated.
- Waste water analysis follows the rules set forth in 40 CFR part 136 except where otherwise noted.
- Accreditation by the State of Illinois is not an endorsement or a guarantee of the validity of data generated.
- For more information about the laboratories' scope of accreditation, please contact us at (708) 544-3260 or the Agency at (217) 782-6455.

Abbreviations:
- Reporting Limit: The concentration at which an analyte can be routinely detected on a day to day basis, and which also meets regulatory and client needs.
- Quantitation Limit: The lowest concentration at which results can be accurately quantitated.
- J: The analyte was positively identified above our Method Detection Limit and is considered detectable and usable; however, the associated numerical value is the approximate concentration of the analyte in the sample.
- ATC: Automatic Temperature Correction. - TNTC: Too Numerous To Count
- In Laboratory: EPA recommends this analyte be analyzed "immediately" (e.g., tests that should be performed in the field within 15 minutes of collection). Analytes with "immediate" hold times are analyzed as soon as possible upon receipt by the laboratory.
- TIC: Tentatively Identified Compound (GCMS library search identification, concentration estimated to nearest internal standard).
- SS (Surrogate Standard): Quality control compound added to the sample by the lab.

Method References:
For a complete list of method references please contact us.
- E: USEPA Reference methods
- SW: USEPA, Test Methods for Evaluating Solid Waste (SW-846)
- M: Standard Methods for the Examination of Water and Wastewater
- USP: Latest version of United States Pharmacopeia

Workorder Specific Comments:

Suburban Laboratories, Inc.
1950 S. Batavia Ave., Suite 150, Geneva, IL 60134 (708) 544-3260

Laboratory Results

Client ID: CWM Company, Inc
Project Name: Dersch - Crostows - Lawrenceville

Report Date: April 08, 2014
Workorder: 1404010

Client Sample ID: MW6 (2.5)
Lab ID: 1404010-001
Date Received: 04/01/2014 9:20 AM
Matrix: SOIL
Collection Date: 03/27/2014 12:05 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ls	
Benzene	ND	0.0123		mg/Kg-dry	39.38	04/03/2014 3:12 PM	R45539
Ethylbenzene	ND	0.0494		mg/Kg-dry	39.38	04/03/2014 3:12 PM	R45539
m,p-Xylene	ND	0.0987		mg/Kg-dry	39.38	04/03/2014 3:12 PM	R45539
Methyl tert-butyl ether	ND	0.0494		mg/Kg-dry	39.38	04/03/2014 3:12 PM	R45539
o-Xylene	ND	0.0494		mg/Kg-dry	39.38	04/03/2014 3:12 PM	R45539
Total Xylenes	ND	0.0987		mg/Kg-dry	39.38	04/03/2014 3:12 PM	R45539
Toluene	ND	0.0494		mg/Kg-dry	39.38	04/03/2014 3:12 PM	R45539
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	98.1	85.9-111		%REC	39.38	04/03/2014 3:12 PM	R45539
SS: Dibromofluoromethane	103	87.5-113		%REC	39.38	04/03/2014 3:12 PM	R45539
SS: Toluene-d8	103	83.3-121		%REC	39.38	04/03/2014 3:12 PM	R45539
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	20	1.0		wt%	1	04/02/2014 3:00 PM	R45481

Client Sample ID: MW6 (7.5)
Lab ID: 1404010-002
Date Received: 04/01/2014 9:20 AM
Matrix: SOIL
Collection Date: 03/27/2014 12:15 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ls	
Benzene	ND	0.0141		mg/Kg-dry	43.68	04/03/2014 3:47 PM	R45539
Ethylbenzene	ND	0.0565		mg/Kg-dry	43.68	04/03/2014 3:47 PM	R45539
m,p-Xylene	ND	0.113		mg/Kg-dry	43.68	04/03/2014 3:47 PM	R45539
Methyl tert-butyl ether	ND	0.0565		mg/Kg-dry	43.68	04/03/2014 3:47 PM	R45539
o-Xylene	ND	0.0565		mg/Kg-dry	43.68	04/03/2014 3:47 PM	R45539
Total Xylenes	ND	0.113		mg/Kg-dry	43.68	04/03/2014 3:47 PM	R45539
Toluene	ND	0.0565		mg/Kg-dry	43.68	04/03/2014 3:47 PM	R45539
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	95.9	85.9-111		%REC	43.68	04/03/2014 3:47 PM	R45539
SS: Dibromofluoromethane	104	87.5-113		%REC	43.68	04/03/2014 3:47 PM	R45539
SS: Toluene-d8	102	83.3-121		%REC	43.68	04/03/2014 3:47 PM	R45539
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	23	1.0		wt%	1	04/02/2014 3:00 PM	R45481

Suburban Laboratories, Inc.
1950 S. Batavia Ave., Suite 150, Geneva, IL 60134 (708) 544-3260

Laboratory Results

Client ID: CWM Company, Inc
Project Name: Dersch - Crostows - Lawrenceville

Report Date: April 08, 2014
Workorder: 1404010

Client Sample ID: MW6 (12.5)
Lab ID: 1404010-003
Date Received: 04/01/2014 9:20 AM
Matrix: SOIL
Collection Date: 03/27/2014 12:25 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ks	
Benzene	ND	0.0125		mg/Kg-dry	41.18	04/03/2014 2:42 AM	R45510
Ethylbenzene	ND	0.0502		mg/Kg-dry	41.18	04/03/2014 2:42 AM	R45510
m,p-Xylene	ND	0.100		mg/Kg-dry	41.18	04/03/2014 2:42 AM	R45510
Methyl tert-butyl ether	ND	0.0502		mg/Kg-dry	41.18	04/03/2014 2:42 AM	R45510
o-Xylene	ND	0.0502		mg/Kg-dry	41.18	04/03/2014 2:42 AM	R45510
Total Xylenes	ND	0.100		mg/Kg-dry	41.18	04/03/2014 2:42 AM	R45510
Toluene	ND	0.0502		mg/Kg-dry	41.18	04/03/2014 2:42 AM	R45510
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	103	85.9-111		%REC	41.18	04/03/2014 2:42 AM	R45510
SS: Dibromofluoromethane	87.6	87.5-113		%REC	41.18	04/03/2014 2:42 AM	R45510
SS: Toluene-d8	98.8	83.3-121		%REC	41.18	04/03/2014 2:42 AM	R45510
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	18	1.0		wt%	1	04/02/2014 3:00 PM	R45481

Client Sample ID: MW7 (2.5)
Lab ID: 1404010-004
Date Received: 04/01/2014 9:20 AM
Matrix: SOIL
Collection Date: 03/27/2014 12:55 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ls	
Benzene	ND	0.0125		mg/Kg-dry	39.76	04/03/2014 4:22 PM	R45539
Ethylbenzene	ND	0.0500		mg/Kg-dry	39.76	04/03/2014 4:22 PM	R45539
m,p-Xylene	ND	0.100		mg/Kg-dry	39.76	04/03/2014 4:22 PM	R45539
Methyl tert-butyl ether	ND	0.0500		mg/Kg-dry	39.76	04/03/2014 4:22 PM	R45539
o-Xylene	ND	0.0500		mg/Kg-dry	39.76	04/03/2014 4:22 PM	R45539
Total Xylenes	ND	0.100		mg/Kg-dry	39.76	04/03/2014 4:22 PM	R45539
Toluene	ND	0.0500		mg/Kg-dry	39.76	04/03/2014 4:22 PM	R45539
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	98.8	85.9-111		%REC	39.76	04/03/2014 4:22 PM	R45539
SS: Dibromofluoromethane	105	87.5-113		%REC	39.76	04/03/2014 4:22 PM	R45539
SS: Toluene-d8	102	83.3-121		%REC	39.76	04/03/2014 4:22 PM	R45539
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	21	1.0		wt%	1	04/02/2014 3:00 PM	R45481

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Laboratory Results

Client ID: CWM Company, Inc
Project Name: Dersch - Crostows - Lawrenceville

Report Date: April 08, 2014
Workorder: 1404010

Client Sample ID: MW7 (7.5)
Lab ID: 1404010-005
Date Received: 04/01/2014 9:20 AM
Matrix: SOIL
Collection Date: 03/27/2014 1:05 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ls	
Benzene	ND	0.0131		mg/Kg-dry	41.21	04/03/2014 4:56 PM	R45539
Ethylbenzene	ND	0.0523		mg/Kg-dry	41.21	04/03/2014 4:56 PM	R45539
m,p-Xylene	ND	0.105		mg/Kg-dry	41.21	04/03/2014 4:56 PM	R45539
Methyl tert-butyl ether	ND	0.0523		mg/Kg-dry	41.21	04/03/2014 4:56 PM	R45539
o-Xylene	ND	0.0523		mg/Kg-dry	41.21	04/03/2014 4:56 PM	R45539
Total Xylenes	ND	0.157		mg/Kg-dry	41.21	04/03/2014 4:56 PM	R45539
Toluene	ND	0.0523		mg/Kg-dry	41.21	04/03/2014 4:56 PM	R45539
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	93.7	85.9-111		%REC	41.21	04/03/2014 4:56 PM	R45539
SS: Dibromofluoromethane	103	87.5-113		%REC	41.21	04/03/2014 4:56 PM	R45539
SS: Toluene-d8	101	83.3-121		%REC	41.21	04/03/2014 4:56 PM	R45539
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	21	1.0		wt%	1	04/02/2014 3:00 PM	R45481

Client Sample ID: MW7 (12.5)
Lab ID: 1404010-006
Date Received: 04/01/2014 9:20 AM
Matrix: SOIL
Collection Date: 03/27/2014 1:15 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ls	
Benzene	ND	0.0133		mg/Kg-dry	42.14	04/04/2014 12:33 PM	R45590
Ethylbenzene	ND	0.0533		mg/Kg-dry	42.14	04/04/2014 12:33 PM	R45590
m,p-Xylene	ND	0.107		mg/Kg-dry	42.14	04/04/2014 12:33 PM	R45590
Methyl tert-butyl ether	ND	0.0533		mg/Kg-dry	42.14	04/04/2014 12:33 PM	R45590
o-Xylene	ND	0.0533		mg/Kg-dry	42.14	04/04/2014 12:33 PM	R45590
Total Xylenes	ND	0.107		mg/Kg-dry	42.14	04/04/2014 12:33 PM	R45590
Toluene	ND	0.0533		mg/Kg-dry	42.14	04/04/2014 12:33 PM	R45590
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	97.7	85.9-111		%REC	42.14	04/04/2014 12:33 PM	R45590
SS: Dibromofluoromethane	104	87.5-113		%REC	42.14	04/04/2014 12:33 PM	R45590
SS: Toluene-d8	97.3	83.3-121		%REC	42.14	04/04/2014 12:33 PM	R45590
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	21	1.0		wt%	1	04/02/2014 3:00 PM	R45481

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Laboratory Results

Client ID: CWM Company, Inc
Project Name: Dersch - Crostows - Lawrenceville

Report Date: April 08, 2014
Workorder: 1404010

Client Sample ID: MW8 (2.5)
Lab ID: 1404010-007 **Date Received:** 04/01/2014 9:20 AM

Matrix: SOIL
Collection Date: 03/27/2014 1:45 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ls	
Benzene	ND	0.0130		mg/Kg-dry	41.18	04/03/2014 5:33 PM	R45539
Ethylbenzene	ND	0.0519		mg/Kg-dry	41.18	04/03/2014 5:33 PM	R45539
m,p-Xylene	ND	0.104		mg/Kg-dry	41.18	04/03/2014 5:33 PM	R45539
Methyl tert-butyl ether	ND	0.0519		mg/Kg-dry	41.18	04/03/2014 5:33 PM	R45539
o-Xylene	ND	0.0519		mg/Kg-dry	41.18	04/03/2014 5:33 PM	R45539
Total Xylenes	ND	0.104		mg/Kg-dry	41.18	04/03/2014 5:33 PM	R45539
Toluene	ND	0.0519		mg/Kg-dry	41.18	04/03/2014 5:33 PM	R45539
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	97.5	85.9-111		%REC	41.18	04/03/2014 5:33 PM	R45539
SS: Dibromofluoromethane	104	87.5-113		%REC	41.18	04/03/2014 5:33 PM	R45539
SS: Toluene-d8	99.6	83.3-121		%REC	41.18	04/03/2014 5:33 PM	R45539
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	21	1.0		wt%	1	04/02/2014 3:00 PM	R45481

Client Sample ID: MW8 (7.5)
Lab ID: 1404010-008 **Date Received:** 04/01/2014 9:20 AM

Matrix: SOIL
Collection Date: 03/27/2014 1:55 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ls	
Benzene	ND	0.0137		mg/Kg-dry	42.49	04/03/2014 6:10 PM	R45539
Ethylbenzene	ND	0.0550		mg/Kg-dry	42.49	04/03/2014 6:10 PM	R45539
m,p-Xylene	ND	0.110		mg/Kg-dry	42.49	04/03/2014 6:10 PM	R45539
Methyl tert-butyl ether	ND	0.0550		mg/Kg-dry	42.49	04/03/2014 6:10 PM	R45539
o-Xylene	ND	0.0550		mg/Kg-dry	42.49	04/03/2014 6:10 PM	R45539
Total Xylenes	ND	0.110		mg/Kg-dry	42.49	04/03/2014 6:10 PM	R45539
Toluene	ND	0.0550		mg/Kg-dry	42.49	04/03/2014 6:10 PM	R45539
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	97.0	85.9-111		%REC	42.49	04/03/2014 6:10 PM	R45539
SS: Dibromofluoromethane	103	87.5-113		%REC	42.49	04/03/2014 6:10 PM	R45539
SS: Toluene-d8	97.1	83.3-121		%REC	42.49	04/03/2014 6:10 PM	R45539
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	23	1.0		wt%	1	04/02/2014 3:00 PM	R45481

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Laboratory Results

Client ID: CWM Company, Inc
Project Name: Dersch - Crostows - Lawrenceville

Report Date: April 08, 2014
Workorder: 1404010

Client Sample ID: MW8 (12.5)
Lab ID: 1404010-009
Date Received: 04/01/2014 9:20 AM
Matrix: SOIL
Collection Date: 03/27/2014 2:05 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ls	
Benzene	ND	0.0129		mg/Kg-dry	42.64	04/04/2014 1:41 PM	R45590
Ethylbenzene	ND	0.0515		mg/Kg-dry	42.64	04/04/2014 1:41 PM	R45590
m,p-Xylene	ND	0.103		mg/Kg-dry	42.64	04/04/2014 1:41 PM	R45590
Methyl tert-butyl ether	ND	0.0515		mg/Kg-dry	42.64	04/04/2014 1:41 PM	R45590
o-Xylene	ND	0.0515		mg/Kg-dry	42.64	04/04/2014 1:41 PM	R45590
Total Xylenes	ND	0.103		mg/Kg-dry	42.64	04/04/2014 1:41 PM	R45590
Toluene	ND	0.0515		mg/Kg-dry	42.64	04/04/2014 1:41 PM	R45590
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	99.3	85.9-111		%REC	42.64	04/04/2014 1:41 PM	R45590
SS: Dibromofluoromethane	105	87.5-113		%REC	42.64	04/04/2014 1:41 PM	R45590
SS: Toluene-d8	98.6	83.3-121		%REC	42.64	04/04/2014 1:41 PM	R45590
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	17	1.0		wt%	1	04/02/2014 3:00 PM	R45481

Client Sample ID: MW9 (2.5)
Lab ID: 1404010-010
Date Received: 04/01/2014 9:20 AM
Matrix: SOIL
Collection Date: 03/27/2014 2:35 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ls	
Benzene	ND	0.0113		mg/Kg-dry	35.69	04/04/2014 1:07 PM	R45590
Ethylbenzene	ND	0.0453		mg/Kg-dry	35.69	04/04/2014 1:07 PM	R45590
m,p-Xylene	ND	0.0906		mg/Kg-dry	35.69	04/04/2014 1:07 PM	R45590
Methyl tert-butyl ether	ND	0.0453		mg/Kg-dry	35.69	04/04/2014 1:07 PM	R45590
o-Xylene	ND	0.0453		mg/Kg-dry	35.69	04/04/2014 1:07 PM	R45590
Total Xylenes	ND	0.0906		mg/Kg-dry	35.69	04/04/2014 1:07 PM	R45590
Toluene	ND	0.0453		mg/Kg-dry	35.69	04/04/2014 1:07 PM	R45590
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	97.9	85.9-111		%REC	35.69	04/04/2014 1:07 PM	R45590
SS: Dibromofluoromethane	105	87.5-113		%REC	35.69	04/04/2014 1:07 PM	R45590
SS: Toluene-d8	100	83.3-121		%REC	35.69	04/04/2014 1:07 PM	R45590
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	21	1.0		wt%	1	04/02/2014 3:00 PM	R45481

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Laboratory Results

Client ID: CWM Company, Inc
Project Name: Dersch - Crostows - Lawrenceville

Report Date: April 08, 2014
Workorder: 1404010

Client Sample ID: MW9 (7.5)
Lab ID: 1404010-011
Date Received: 04/01/2014 9:20 AM
Matrix: SOIL
Collection Date: 03/27/2014 2:45 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ls	
Benzene	ND	0.0128		mg/Kg-dry	39.47	04/04/2014 2:15 PM	R45590
Ethylbenzene	ND	0.0513		mg/Kg-dry	39.47	04/04/2014 2:15 PM	R45590
m,p-Xylene	ND	0.103		mg/Kg-dry	39.47	04/04/2014 2:15 PM	R45590
Methyl tert-butyl ether	ND	0.0513		mg/Kg-dry	39.47	04/04/2014 2:15 PM	R45590
o-Xylene	ND	0.0513		mg/Kg-dry	39.47	04/04/2014 2:15 PM	R45590
Total Xylenes	ND	0.103		mg/Kg-dry	39.47	04/04/2014 2:15 PM	R45590
Toluene	ND	0.0513		mg/Kg-dry	39.47	04/04/2014 2:15 PM	R45590
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	100	85.9-111		%REC	39.47	04/04/2014 2:15 PM	R45590
SS: Dibromofluoromethane	105	87.5-113		%REC	39.47	04/04/2014 2:15 PM	R45590
SS: Toluene-d8	102	83.3-121		%REC	39.47	04/04/2014 2:15 PM	R45590
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	23	1.0		wt%	1	04/02/2014 3:00 PM	R45481

Client Sample ID: MW9 (12.5)
Lab ID: 1404010-012
Date Received: 04/01/2014 9:20 AM
Matrix: SOIL
Collection Date: 03/27/2014 2:55 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ls	
Benzene	ND	0.0129		mg/Kg-dry	42.88	04/04/2014 2:59 PM	R45590
Ethylbenzene	ND	0.0518		mg/Kg-dry	42.88	04/04/2014 2:59 PM	R45590
m,p-Xylene	ND	0.104		mg/Kg-dry	42.88	04/04/2014 2:59 PM	R45590
Methyl tert-butyl ether	ND	0.0518		mg/Kg-dry	42.88	04/04/2014 2:59 PM	R45590
o-Xylene	ND	0.0518		mg/Kg-dry	42.88	04/04/2014 2:59 PM	R45590
Total Xylenes	ND	0.104		mg/Kg-dry	42.88	04/04/2014 2:59 PM	R45590
Toluene	ND	0.0518		mg/Kg-dry	42.88	04/04/2014 2:59 PM	R45590
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	95.7	85.9-111		%REC	42.88	04/04/2014 2:59 PM	R45590
SS: Dibromofluoromethane	105	87.5-113		%REC	42.88	04/04/2014 2:59 PM	R45590
SS: Toluene-d8	103	83.3-121		%REC	42.88	04/04/2014 2:59 PM	R45590
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	17	1.0		wt%	1	04/02/2014 3:00 PM	R45481

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Laboratory Results

Client ID: CWM Company, Inc
Project Name: Dersch - Crostows - Lawrenceville

Report Date: April 08, 2014
Workorder: 1404010

Client Sample ID: SB1 2.5
Lab ID: 1404010-013 **Date Received:** 04/01/2014 9:20 AM

Matrix: SOIL
Collection Date: 03/27/2014 3:25 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ls	
Benzene	ND	0.0124		mg/Kg-dry	39.24	04/04/2014 3:33 PM	R45590
Ethylbenzene	ND	0.0495		mg/Kg-dry	39.24	04/04/2014 3:33 PM	R45590
m,p-Xylene	ND	0.0991		mg/Kg-dry	39.24	04/04/2014 3:33 PM	R45590
Methyl tert-butyl ether	ND	0.0495		mg/Kg-dry	39.24	04/04/2014 3:33 PM	R45590
o-Xylene	ND	0.0495		mg/Kg-dry	39.24	04/04/2014 3:33 PM	R45590
Total Xylenes	ND	0.0991		mg/Kg-dry	39.24	04/04/2014 3:33 PM	R45590
Toluene	ND	0.0495		mg/Kg-dry	39.24	04/04/2014 3:33 PM	R45590
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	97.5	85.9-111		%REC	39.24	04/04/2014 3:33 PM	R45590
SS: Dibromofluoromethane	105	87.5-113		%REC	39.24	04/04/2014 3:33 PM	R45590
SS: Toluene-d8	97.8	83.3-121		%REC	39.24	04/04/2014 3:33 PM	R45590
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	21	1.0		wt%	1	04/02/2014 3:00 PM	R45481

Client Sample ID: SB1 7.5
Lab ID: 1404010-014 **Date Received:** 04/01/2014 9:20 AM

Matrix: SOIL
Collection Date: 03/27/2014 3:35 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ls	
Benzene	ND	0.0123		mg/Kg-dry	40.37	04/04/2014 4:06 PM	R45590
Ethylbenzene	ND	0.0494		mg/Kg-dry	40.37	04/04/2014 4:06 PM	R45590
m,p-Xylene	ND	0.0987		mg/Kg-dry	40.37	04/04/2014 4:06 PM	R45590
Methyl tert-butyl ether	ND	0.0494		mg/Kg-dry	40.37	04/04/2014 4:06 PM	R45590
o-Xylene	ND	0.0494		mg/Kg-dry	40.37	04/04/2014 4:06 PM	R45590
Total Xylenes	ND	0.0987		mg/Kg-dry	40.37	04/04/2014 4:06 PM	R45590
Toluene	ND	0.0494		mg/Kg-dry	40.37	04/04/2014 4:06 PM	R45590
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	96.4	85.9-111		%REC	40.37	04/04/2014 4:06 PM	R45590
SS: Dibromofluoromethane	107	87.5-113		%REC	40.37	04/04/2014 4:06 PM	R45590
SS: Toluene-d8	98.7	83.3-121		%REC	40.37	04/04/2014 4:06 PM	R45590
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	18	1.0		wt%	1	04/02/2014 3:00 PM	R45481

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Laboratory Results

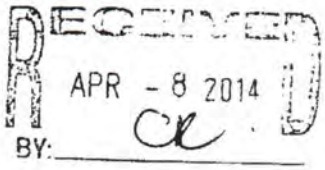
Client ID: CWM Company, Inc
Project Name: Dersch - Crostows - Lawrenceville

Report Date: April 08, 2014
Workorder: 1404010

Client Sample ID: SB1 12.5
Lab ID: 1404010-015
Date Received: 04/01/2014 9:20 AM

Matrix: SOIL
Collection Date: 03/27/2014 3:45 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96				Analyst: ls	
Benzene	ND	0.0118		mg/Kg-dry	38.45	04/04/2014 4:40 PM	R45590
Ethylbenzene	ND	0.0473		mg/Kg-dry	38.45	04/04/2014 4:40 PM	R45590
m,p-Xylene	ND	0.0947		mg/Kg-dry	38.45	04/04/2014 4:40 PM	R45590
Methyl tert-butyl ether	ND	0.0473		mg/Kg-dry	38.45	04/04/2014 4:40 PM	R45590
o-Xylene	ND	0.0473		mg/Kg-dry	38.45	04/04/2014 4:40 PM	R45590
Total Xylenes	ND	0.0947		mg/Kg-dry	38.45	04/04/2014 4:40 PM	R45590
Toluene	ND	0.0473		mg/Kg-dry	38.45	04/04/2014 4:40 PM	R45590
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	98.5	85.9-111		%REC	38.45	04/04/2014 4:40 PM	R45590
SS: Dibromofluoromethane	106	87.5-113		%REC	38.45	04/04/2014 4:40 PM	R45590
SS: Toluene-d8	96.2	83.3-121		%REC	38.45	04/04/2014 4:40 PM	R45590
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005				Analyst: mkl	
Percent Moisture	19	1.0		wt%	1	04/02/2014 3:00 PM	R45481



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PREP DATES REPORT

Client: CWM Company, Inc
Project: Dersch - Crostows - Lawrenceville

Report Date: April 08, 2014
Lab Order: 1404010

Sample ID	Collection Date	Batch ID	Prep Method	Prep Test Name	TCLP Date	Prep Date
1404010-001A	3/27/2014 12:05:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014
1404010-002A	3/27/2014 12:15:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014
1404010-003A	3/27/2014 12:25:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014
1404010-004A	3/27/2014 12:55:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014
1404010-005A	3/27/2014 1:05:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014
1404010-006A	3/27/2014 1:15:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014
1404010-007A	3/27/2014 1:45:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014
1404010-008A	3/27/2014 1:55:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014
1404010-009A	3/27/2014 2:05:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014
1404010-010A	3/27/2014 2:35:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014
1404010-011A	3/27/2014 2:45:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014
1404010-012A	3/27/2014 2:55:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014
1404010-013A	3/27/2014 3:25:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014
1404010-014A	3/27/2014 3:35:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014
1404010-015A	3/27/2014 3:45:00 P	21048	5035PR	CLOSED SYSTEM P&T VOC Prep		4/1/2014

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Qualifier Definitions

WO#: 1404010
Date: 4/8/2014

Qualifiers:

*/x	Value exceeds Maximum Contaminant Level
B	Analyte detected in the associated Method Blank
c	Analyte not in SLI scope of accreditation
E	Estimated, detected above quantitation range
G	Refer to case narrative page for specific comments
H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limit (QL)
N	Tentatively identified compounds
ND	Not Detected at the Reporting Limit
P	Present
R	RPD outside accepted recovery limits
S	Spike Recovery outside accepted recovery limits

SUBURBAN LABORATORIES, Inc.

4140 Litt Drive Hillside, IL 60162 Tel. 708.544.3260 Fax: 708.544.8587 Toll Free: 800.783.LABS www.suburbanlabs.com

CHAIN OF CUSTODY RECORD # 111248

Company Name: CWM Co Inc.
Company Address: 701 W. S. Grand Ave
City: Springfield State: IL Zip: 62704
Phone: 217 522 8008 / 8009 Fax Report
Email Address: CWM@EWMCompany.com Final Report will be emailed
Project ID / Location: Dorsch - Crestown's - Lawrenceville
Project Manager (Report to): Carol L. Rowe
Sample Collector(s) Name: RJS/BMW

TURNAROUND TIME REQUESTED
☒ Normal ☐ RUSH* *Additional Rush Charges Approved.
*Date & Time Needed: _____
Normal TAT is specified on the price quotation or fee schedule. Rush work must be pre-approved and additional charges apply.

Specify Regulatory Program: (Required) ☐ None/Info Only
☒ LUST ☐ SRP ☐ SDWA
☐ 503 Sludge ☐ NPDES ☐ MWRDGC
☐ Disposal ☐ Other* *Please specify in comment section below.

ANALYSIS & METHOD REQUESTED
Enter an "X" in box below for request

BETX, MTBE

Page of
PO No.
Shipping Method
Reporting Level (at additional charge) 1 2 3 4
LAB USE ONLY
SLI ORDER No. 140610
Sample containers supplied by customer? ☐ Yes
Temperature of Received Samples: 2 °C
Samples received the same day as collection? ☐ Yes

	SAMPLE IDENTIFICATION *Use One Line Per Preservation & Container Type*	COLLECTION DATE	COLLECTION TIME	MATRIX	GRAB/ COMP.	CONTAINERS Qty	CONTAINERS SIZE & TYPE	PRESERVATIVE	R	Condition	Split	LAB #
1	MW6 (2.5)	3/27/14	1205	S	G	1/1	40ml/40z	MeOH/water	X			1A/B
2	MW6 (7.5)	"	1215									
3	MW6 (12.5)	"	1225									
4	MW7 (2.5)	"	1255									
5	MW7 (7.5)	"	105									
6	MW7 (12.5)	"	115									
7	MW8 (2.5)	"	145									
8	MW8 (7.5)	"	155									
9	MW8 (12.5)	"	205									
10	MW9 (2.5)	"	235									
11	MW9 (7.5)	"	245									
12	MW9 (12.5)	"	255									12A/B

MATRIX: Drinking Water (DW), Soil (S), Waste Water (WW), Surface Water(SW), Ground Water (GW), Solid Waste (WA), Sludge (U), Wipe (P) CONTAINER: 2oz. 4oz. 8oz. 40ml Vial, 500ml, Liter (L), Tube, Glass (G), Plastic (P) PRESERVATIVE: H_2SO_4, HCl, HNO_3, Methanol (MeOH) NaOH, Sodium Bisulfate (NaB), NaThio

COMMENTS & SPECIAL INSTRUCTIONS:
12-13 Rules

RECEIVED
APR - 8 2014
CK

CONDITION CODES
1. Improper/damaged container/cap
2. Improper preservation
3. Insufficient sample volume
4. Headspace/air bubbles for VOCs
5. Received past holding time
6. Received frozen
7. Label conflicts with COC

1. Relinquished By	Date	2. Relinquished By	Date	3. Relinquished By	Date	4. Relinquished By	Date
	3-28-14		3-31-14	Andy Hoyt	4-1-14		
Received By	Time	Received By	Time	Received By	Time	Received By	Time
		Andy Hoyt	2:25	K Cullom	9:20AM		
☐ Ice present		☐ Ice present		☐ Ice present		☐ Ice present	

Submission of samples subject to Terms and Conditions on back. Rev. 07/20/08 White-Original, Pink-Sampler Copy

SUBURBAN LABORATORIES, Inc.

4140 Litt Drive Hillside, IL 60162 Tel. 708.544.3260 Fax: 708.544.8587 Toll Free: 800.783.LABS www.suburbanlabs.com

CHAIN OF CUSTODY RECORD

111249

Page 2 of 2

Company Name: CWM COMPANY

Company Address: CWM@CWMCOMPANY.COM

City: SPRINGFIELD State: IL Zip: 62704

Phone: 217-522-8001 Fax: ☐ Fax Report

Email Address: 201 SOUTH GRAND AVE W. Final Report will be emailed

Project ID / Location: DERSCH LAWRENCEVILLE

Project Manager (Report to): CAROL ROWE

Sample Collector(s) Name: BMW/RJS

TURNAROUND TIME REQUESTED

☐ Normal ☐ RUSH* *Additional Rush Charges Approved.

*Date & Time Needed:

Normal TAT is specified on the price quotation or fee schedule. Rush work must be pre-approved and additional charges apply.

Specify Regulatory Program: (Required) ☐ None/Info Only

☑ LUST ☐ SRP ☐ SDWA

☐ 503 Sludge ☐ NPDES ☐ MWRDGC

☐ Disposal ☐ Other* *Please specify in comment section below.

ANALYSIS & METHOD REQUESTED

Enter an "X" in box below for request

BETX, MTBE

PO No.:

Shipping Method:

Reporting Level (at additional charge) 1 2 3 4

LAB USE ONLY

SLI ORDER No.: 140410

Sample containers supplied by customer? ☐ Yes

Temperature of Received Samples: °C

Samples received the same day as collection? ☐ Yes

	SAMPLE IDENTIFICATION *Use One Line Per Preservation & Container Type*	COLLECTION DATE	COLLECTION TIME	MATRIX	GRAB/ COMP.	CONTAINERS Qty	CONTAINERS SIZE & TYPE	PRESERVATIVE	R	Condition	Split	LAB #
1	SB1 2.5	3/27/14	3:25	S	G	1/1	~~40ml~~/40Z	MEOH/NONE	X			13A/B
2	SB1 7.5	1/1	3:35	↓	↓		40ml/40Z	MEOH/NONE	X			14A/B
3	SB1 12.5	1/1	3:45	↓	↓		40ml/40Z	MEOH/NONE	X			15A/B
4		/ /										
5		/ /										
6		/ /										
7		/ /										
8		/ /										
9		/ /										
10		/ /										
11		/ /										
12		/ /										

MATRIX: Drinking Water (DW), Soil (S), Waste Water (WW), Surface Water(SW), Ground Water (GW), Solid Waste (WA), Sludge (U), Wipe (P) CONTAINER: 2oz, 4oz, 8oz, 40ml Vial, 500ml, Liter (L), Tube, Glass (G), Plastic (P) PRESERVATIVE: H_2SO_4, HCl, HNO_3, Methanol (MeOH) NaOH, Sodium Bisulfate (NaB), NaThio

COMMENTS & SPECIAL INSTRUCTIONS:

RECEIVED APR - 8 2014 BY:

CONDITION CODES

1. Improper/damaged container/cap
2. Improper preservation
3. Insufficient sample volume
4. Headspace/air bubbles for VOCs
5. Received past holding time
6. Received frozen
7. Label conflicts with COC

1. Relinquished By	Date	2. Relinquished By	Date	3. Relinquished By	Date	4. Relinquished By	Date
[signature]	3-28-14		3-31-14	[signature]	4-1-14		
Received By [signature] ☒ Ice present	Time	Received By [signature] ☐ Ice present	Time 2:25	Received By [signature] ☒ Ice present	Time 9:20	Received By ☐ Ice present	Time

Submission of samples subject to Terms and Conditions on back.

Rev. 07/20/08

White-Original, Pink-Sampler Copy

Illinois Environmental Protection Agency

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The Agency is authorized to require this information under Section 4 and Title XVI of the Environmental Protection Act (415 ILCS 5/4, 5/57 – 57.17). Failure to disclose this information may result in a civil penalty of not to exceed $50,000.00 for the violation and an additional civil penalty of not to exceed $10,000.00 for each day during which the violation continues (415 ILCS 5/42). Any person who knowingly makes a false material statement or representation, orally or in writing, in any label, manifest, record, report, permit, or license, or other document filed, maintained or used for the purpose of compliance with Title XVI commits a Class 4 felony. Any second or subsequent offense after conviction hereunder is a Class 3 felony (415 ILCS 5/44 and 57.17). This form has been approved by the Forms Management Center.

RECEIVED
APR 14 2014
BY: CR

Leaking Underground Storage Tank Program
Laboratory Certification for Chemical Analysis

A. Site Identification

IEMA Incident # (6- or 8-digit): 2005-0374 IEPA LPC# (10-digit): 1010155024

Site Name: DERSCH - LAWRENCEVILLE CROSLOW

Site Address (Not a P.O. Box): 1421 LEXINGTON AVENUE

City: LAWRENCEVILLE County: LAWRENCE ZIP Code: 62439

Leaking UST Technical File

B. Sample Collector

I certify that:

1. Appropriate sampling equipment/methods were utilized to obtain representative samples. BW (Initial)
2. Chain-of-custody procedures were followed in the field. BW (Initial)
3. Sample integrity was maintained by proper preservation. BW (Initial)
4. All samples were properly labeled. BW (Initial)

C. Laboratory Representative

I certify that:

1. Proper chain-of-custody procedures were followed as documented on the chain-of-custody forms (Initial)
2. Sample integrity was maintained by proper preservation. (Initial)
3. All samples were properly labeled. (Initial)
4. Quality assurance/quality control procedures were established and carried out. (Initial)
5. Sample holding times were not exceeded. (Initial)

6. SW-846 Analytical Laboratory Procedure (USEPA) methods were used for the analyses. (Initial)

7. An accredited lab performed quantitative analysis using test methods identified in 35 IAC 186.180 (for samples collected on or after January 1, 2003). (Initial)

D. Signatures

I hereby affirm that all information contained in this form is true and accurate to the best of my knowledge and belief. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sample Collector

Name BRAD WAGNER
Title ENGINEER
Company CWM Company, Inc.
Address 701 W. South Grand Avenue
City Springfield
State Illinois
Zip Code 62704
Phone (217) 522-8001
Signature Brad Wagner
Date 3/27/14

Laboratory Representative

Name Kelly Gilhare
Title Project Manager
Company Suburban Laboratories, Inc.
Address 1950 S. Batavia Ave Ste 150
City Geneva
State Illinois
Zip Code 60134
Phone 708-544-3260
Signature K Gilhare
Date 4-8-14

RECEIVED
APR 14 2014
BY: CR

SUBURBAN LABORATORIES, Inc.

INVOICE

FEIN # 36-2695636

1950 S. Batavia Ave., Suite 150 Geneva, Illinois 60134
Tel. (708) 544-3260 • Toll Free (800) 783-LABS
Fax (708) 544-8587
www.suburbanlabs.com

Remit To: Suburban Laboratories, Inc.
1950 S. Batavia Ave., Suite 150
Geneva, IL 60134
Phone: 708-544-3260 Fax: 708-544-8587

Invoice#: **111318**
Invoice Date: **4/10/2014**

Terms: NET90
Invoice Due: 7/9/2014

Carol Rowe
ACCOUNTS PAYABLE
CWM Company, Inc
701 West South Grand
Springfield, IL 62704

Priority: Rush
PO:
Report To: Carol Rowe
Fax: (217) 522-8009

Work Order: **1404373** Date Received: 4/8/2014 Project: Croslows Shell - Lawrenceville, IL

Item Description	Matrix	Remarks	Qty	Unit Price	% Disc.	Net Price	Total
BTEX + MTBE Water	Groundwater	July 2012 - June 2013	4	$94.77			$379.08

Miscellaneous Charge Summary

Item	*Unit*	*Qty*	*Total*
Shipping & Handling	$58.50	1	$58.50
5035 Sampling Kit	$11.70	0	$0.00

Sub Total:	$379.08
Misc. Charges:	$58.50
Surcharge:	0.00%
INVOICE Total:	**$437.58**
Pre-Paid Amount:	$0.00
Total Payable Amount:	**$437.58**

Comments: Terms per signed agreement

RECEIVED
APR 10 2014
BY: CR

Illinois Department of Public Health Accredited #17585

Illinois Environmental Protection Agency Accredited #100225

Rpt Ver: Kelly 4/10/2014 2:32 PM

SUBURBAN LABORATORIES, Inc.

1950 S. Batavia Ave., Suite 150 Geneva, Illinois 60134
Tel. (708) 544-3260 • Toll Free (800) 783-LABS
Fax (708) 544-8587
www.suburbanlabs.com

April 10, 2014

Workorder: 1404373

Carol Rowe
CWM Company, Inc
701 West South Grand
Springfield, IL 62704

TEL: (217) 522-8001
FAX: (217) 522-8009
RE: Croslows Shell - Lawrenceville, IL

Dear Carol Rowe:

Suburban Laboratories, Inc. received 4 sample(s) on 4/8/2014 for the analyses presented in the following report.

All data for the associated quality control (QC) met EPA, method, or internal laboratory specifications except where noted in the case narrative. If you are comparing these results to external QC specifications or compliance limits and have any questions, please contact us.

This final report of laboratory analysis consists of this cover letter, case narrative, analytical report, dates report, and any accompanying documentation on, but not limited to, chain of custody records, raw data, and letters of explanation or reliance. This report may not be reproduced, except in full, without the prior written approval of Suburban Laboratories, Inc.

If you have any questions regarding these test results, please call me at (708) 544-3260.

Sincerely,

Kelly Culhane

Kelly Culhane
Project Manager
708-544-3260 ext 212
kelly@suburbanlabs.com

Suburban Laboratories, Inc.
1950 S. Batavia Ave., Suite 150, Geneva, IL 60134 (708) 544-3260

Case Narrative

Client: CWM Company, Inc	**Date:** April 10, 2014
Project: Croslows Shell - Lawrenceville, IL	**PO #:**
WorkOrder: 1404373	**QC Level:**
Temperature of samples upon receipt at SLI: 4 C	**Chain of Custody #:** 113251

General Comments:
- All results reported in wet weight unless otherwise indicated. (dry = Dry Weight)
- Sample results relate only to the analytes of interest tested and to sample as received by the laboratory.
- Environmental compliance sample results meet the requirements of 35 IAC Part 186 unless otherwise indicated.
- Waste water analysis follows the rules set forth in 40 CFR part 136 except where otherwise noted.
- Accreditation by the State of Illinois is not an endorsement or a guarantee of the validity of data generated.
- For more information about the laboratories' scope of accreditation, please contact us at (708) 544-3260 or the Agency at (217) 782-6455.

Abbreviations:
- Reporting Limit: The concentration at which an analyte can be routinely detected on a day to day basis, and which also meets regulatory and client needs.
- Quantitation Limit: The lowest concentration at which results can be accurately quantitated.
- J: The analyte was positively identified above our Method Detection Limit and is considered detectable and usable; however, the associated numerical value is the approximate concentration of the analyte in the sample.
- ATC: Automatic Temperature Correction. - TNTC: Too Numerous To Count
- In Laboratory: EPA recommends this analyte be analyzed "immediately" (e.g., tests that should be performed in the field within 15 minutes of collection). Analytes with "immediate" hold times are analyzed as soon as possible upon receipt by the laboratory.
- TIC: Tentatively Identified Compound (GCMS library search identification, concentration estimated to nearest internal standard).
- SS (Surrogate Standard): Quality control compound added to the sample by the lab.

Method References:
For a complete list of method references please contact us.
- E: USEPA Reference methods
- SW: USEPA, Test Methods for Evaluating Solid Waste (SW-846)
- M: Standard Methods for the Examination of Water and Wastewater
- USP: Latest version of United States Pharmacopeia

Workorder Specific Comments:

Suburban Laboratories, Inc.
1950 S. Batavia Ave., Suite 150, Geneva, IL 60134 (708) 544-3260

Laboratory Results

Client ID: CWM Company, Inc
Project Name: Croslows Shell - Lawrenceville, IL

Report Date: April 10, 2014
Workorder: 1404373

Client Sample ID: MW6
Lab ID: 1404373-001 **Date Received:** 04/08/2014 9:26 AM

Matrix: GROUNDWATER
Collection Date: 04/04/2014 10:00 AM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-SW8260B-Rev 2, Dec-96				Analyst: JJ	
Benzene	ND	0.00100		mg/L	1	04/09/2014 5:06 PM	R45696
Ethylbenzene	ND	0.00100		mg/L	1	04/09/2014 5:06 PM	R45696
m,p-Xylene	ND	0.00200		mg/L	1	04/09/2014 5:06 PM	R45696
Methyl tert-butyl ether	ND	0.00100		mg/L	1	04/09/2014 5:06 PM	R45696
o-Xylene	0.00674	0.00100		mg/L	1	04/09/2014 5:06 PM	R45696
Total Xylenes	0.00674	0.00200		mg/L	1	04/09/2014 5:06 PM	R45696
Toluene	0.00309	0.00100		mg/L	1	04/09/2014 5:06 PM	R45696
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	97.6	67.9-119		%REC	1	04/09/2014 5:06 PM	R45696
SS: Dibromofluoromethane	104	62.3-122		%REC	1	04/09/2014 5:06 PM	R45696
SS: Toluene-d8	103	68.2-119		%REC	1	04/09/2014 5:06 PM	R45696

Client Sample ID: MW7
Lab ID: 1404373-002 **Date Received:** 04/08/2014 9:26 AM

Matrix: GROUNDWATER
Collection Date: 04/04/2014 10:20 AM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-SW8260B-Rev 2, Dec-96				Analyst: JJ	
Benzene	ND	0.00100		mg/L	1	04/09/2014 5:41 PM	R45696
Ethylbenzene	ND	0.00100		mg/L	1	04/09/2014 5:41 PM	R45696
m,p-Xylene	ND	0.00200		mg/L	1	04/09/2014 5:41 PM	R45696
Methyl tert-butyl ether	ND	0.00100		mg/L	1	04/09/2014 5:41 PM	R45696
o-Xylene	0.0224	0.00100		mg/L	1	04/09/2014 5:41 PM	R45696
Total Xylenes	0.0224	0.00200		mg/L	1	04/09/2014 5:41 PM	R45696
Toluene	0.0109	0.00100		mg/L	1	04/09/2014 5:41 PM	R45696
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	102	67.9-119		%REC	1	04/09/2014 5:41 PM	R45696
SS: Dibromofluoromethane	105	62.3-122		%REC	1	04/09/2014 5:41 PM	R45696
SS: Toluene-d8	98.6	68.2-119		%REC	1	04/09/2014 5:41 PM	R45696

Suburban Laboratories, Inc.
1950 S. Batavia Ave., Suite 150, Geneva, IL 60134 (708) 544-3260

Laboratory Results

Client ID: CWM Company, Inc
Project Name: Croslows Shell - Lawrenceville, IL

Report Date: April 10, 2014
Workorder: 1404373

Client Sample ID: MW8
Lab ID: 1404373-003 **Date Received:** 04/08/2014 9:26 AM

Matrix: GROUNDWATER
Collection Date: 04/04/2014 10:40 AM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-SW8260B-Rev 2, Dec-96				Analyst: JJ	
Benzene	ND	0.00100		mg/L	1	04/09/2014 6:16 PM	R45696
Ethylbenzene	ND	0.00100		mg/L	1	04/09/2014 6:16 PM	R45696
m,p-Xylene	0.00253	0.00200		mg/L	1	04/09/2014 6:16 PM	R45696
Methyl tert-butyl ether	ND	0.00100		mg/L	1	04/09/2014 6:16 PM	R45696
o-Xylene	0.00700	0.00100		mg/L	1	04/09/2014 6:16 PM	R45696
Total Xylenes	0.00953	0.00200		mg/L	1	04/09/2014 6:16 PM	R45696
Toluene	0.00256	0.00100		mg/L	1	04/09/2014 6:16 PM	R45696
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	101	67.9-119		%REC	1	04/09/2014 6:16 PM	R45696
SS: Dibromofluoromethane	105	62.3-122		%REC	1	04/09/2014 6:16 PM	R45696
SS: Toluene-d8	99.6	68.2-119		%REC	1	04/09/2014 6:16 PM	R45696

Client Sample ID: MW9
Lab ID: 1404373-004 **Date Received:** 04/08/2014 9:26 AM

Matrix: GROUNDWATER
Collection Date: 04/04/2014 11:00 AM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-SW8260B-Rev 2, Dec-96				Analyst: JJ	
Benzene	ND	0.00100		mg/L	1	04/09/2014 6:51 PM	R45696
Ethylbenzene	0.00171	0.00100		mg/L	1	04/09/2014 6:51 PM	R45696
m,p-Xylene	0.0113	0.00200		mg/L	1	04/09/2014 6:51 PM	R45696
Methyl tert-butyl ether	ND	0.00100		mg/L	1	04/09/2014 6:51 PM	R45696
o-Xylene	0.0203	0.00100		mg/L	1	04/09/2014 6:51 PM	R45696
Total Xylenes	0.0316	0.00200		mg/L	1	04/09/2014 6:51 PM	R45696
Toluene	0.0180	0.00100		mg/L	1	04/09/2014 6:51 PM	R45696
Internal Quality Control Compounds							
SS: 4-Bromofluorobenzene	97.7	67.9-119		%REC	1	04/09/2014 6:51 PM	R45696
SS: Dibromofluoromethane	106	62.3-122		%REC	1	04/09/2014 6:51 PM	R45696
SS: Toluene-d8	99.9	68.2-119		%REC	1	04/09/2014 6:51 PM	R45696

Suburban Laboratories, Inc.
1950 S. Batavia Ave., Suite 150, Geneva, IL 60134 (708) 544-3260

Qualifier Definitions

WO#: 1404373
Date: 4/10/2014

Qualifiers:

*/x	Value exceeds Maximum Contaminant Level
B	Analyte detected in the associated Method Blank
c	Analyte not in SLI scope of accreditation
E	Estimated, detected above quantitation range
G	Refer to case narrative page for specific comments
H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limit (QL)
N	Tentatively identified compounds
ND	Not Detected at the Reporting Limit
P	Present
R	RPD outside accepted recovery limits
S	Spike Recovery outside accepted recovery limits

SUBURBAN LABORATORIES, Inc.

4140 Litt Drive Hillside, IL 60162 Tel. 708.544.3260 Fax 708.544.8587 Toll Free: 800.783.LABS www.suburbanlabs.com

CHAIN OF CUSTODY RECORD # 113251

Company Name: LWM company
Company Address: 701 W South Grand Ave
City: Springfield State: IL Zip: 62704
Phone: 217-522-8001 Fax: ☐ Fax Report
Email Address: lwm@lwmcompany.com ☐ Final Report will be emailed
Project ID / Location: Crosbaus Shell / Lawrenceville IL
Project Manager (Report to): Carol Rowe
Sample Collector(s) Name: MCD SJR

TURNAROUND TIME REQUESTED
☒ Normal ☐ RUSH* *Additional Rush Charges Approved.
*Date & Time Needed:
Normal TAT is specified on the price quotation or fee schedule. Rush work must be pre-approved and additional charges apply.

Specify Regulatory Program: (Required) ☐ None/Info Only
☒ LUST ☐ SRP ☐ SDWA
☐ 503 Sludge ☐ NPDES ☐ MWRDGC
☐ Disposal ☐ Other* *Please specify in comment section below.

ANALYSIS & METHOD REQUESTED
Enter an "X" in box below for request

Page 1 of 1
PO No.
Shipping Method
Reporting Level (at additional charge) 1 2 3 4

LAB USE ONLY
SLI ORDER No. 1404373
Sample containers supplied by customer? ☐ Yes
Temperature of Received Samples 4 °C
Samples received the same day as collection? ☐ Yes

	SAMPLE IDENTIFICATION "Use One Line Per Preservation & Container Type"	COLLECTION DATE	COLLECTION TIME	MATRIX	GRAB/ COMP.	CONTAINERS Qty	CONTAINERS SIZE & TYPE	PRESERVATIVE	BTEX, MTBE	R-	Condition	Split	LAB #
1	MW6	4/4/14	10:00	GW	G	3	40ml vial		X				001A
2	MW7	4/4/14	10:20	GW	G	3	40ml vial		X				002A
3	MW8	4/4/14	10:40	GW	G	3	40ml vial		X				003A
4	MW9	4/4/14	11:00	GW	G	3	40ml vial		X				004A
5		/ /											
6		/ /											
7		/ /											
8		/ /											
9		/ /											
10		/ /											
11		/ /											
12		/ /											

MATRIX: Drinking Water (DW), Soil (S), Waste Water (WW), Surface Water(SW), Ground Water (GW), Solid Waste (WA), Sludge (U), Wipe (P) CONTAINER: 2oz, 4oz, 8oz, 40ml Vial, 500ml, Liter (L), Tube, Glass (G), Plastic (P) PRESERVATIVE: H_2SO_4, HCl, HNO_3, Methanol (MeOH) NaOH, Sodium Bisulfate (NaB), NaThio

COMMENTS & SPECIAL INSTRUCTIONS: 12-13

RECEIVED APR 10 2014 BY: CL

CONDITION CODES
1. Improper/damaged container/cap
2. Improper preservation
3. Insufficient sample volume
4. Headspace/air bubbles for VOCs
5. Received past holding time
6. Received frozen
7. Label conflicts with COC

1. Relinquished By	Date	2. Relinquished By	Date	3. Relinquished By	Date	4. Relinquished By	Date
	4-7-14		4-9-14				
Received By ☒ Ice present	Time 1:40PM	Received By K Culhane ☐ Ice present	Time 9:26	Received By ☐ Ice present	Time	Received By ☐ Ice present	Time

Submission of samples subject to Terms and Conditions on back. Rev. 07/20/08 White-Original. Pink-Sampler Copy

Illinois Environmental Protection Agency

Bureau of Land • 1021 N. Grand Avenue E. • P.O. Box 19276 • Springfield • Illinois • 62794-9276

The Agency is authorized to require this information under Section 4 and Title XVI of the Environmental Protection Act (415 ILCS 5/4, 5/57 – 57.17). Failure to disclose this information may result in a civil penalty of not to exceed $50,000.00 for the violation and an additional civil penalty of not to exceed $10,000.00 for each day during which the violation continues (415 ILCS 5/42). Any person who knowingly makes a false material statement or representation, orally or in writing, in any label, manifest, record, report, permit, or license, or other document filed, maintained or used for the purpose of compliance with Title XVI commits a Class 4 felony. Any second or subsequent offense after conviction hereunder is a Class 3 felony (415 ILCS 5/44 and 57.17). This form has been approved by the Forms Management Center.

Leaking Underground Storage Tank Program
Laboratory Certification for Chemical Analysis

A. Site Identification

IEMA Incident # (6- or 8-digit): 05-0374 IEPA LPC# (10-digit): 1010155024

Site Name: Croslows Shell

Site Address (Not a P.O. Box): 1421 Lexington Ave

City: Lawrenceville County: ZIP Code: 62439

Leaking UST Technical File

B. Sample Collector

I certify that:

1. Appropriate sampling equipment/methods were utilized to obtain representative samples. MP (Initial)
2. Chain-of-custody procedures were followed in the field. MP (Initial)
3. Sample integrity was maintained by proper preservation. MP (Initial)
4. All samples were properly labeled. MP (Initial)

C. Laboratory Representative

I certify that:

1. Proper chain-of-custody procedures were followed as documented on the chain-of-custody forms (Initial)
2. Sample integrity was maintained by proper preservation. (Initial)
3. All samples were properly labeled. (Initial)
4. Quality assurance/quality control procedures were established and carried out. (Initial)
5. Sample holding times were not exceeded. (Initial)

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6. SW-846 Analytical Laboratory Procedure (USEPA) methods were used for the analyses. (Initial)

7. An accredited lab performed quantitative analysis using test methods identified in 35 IAC 186.180 (for samples collected on or after January 1, 2003). (Initial)

D. Signatures

I hereby affirm that all information contained in this form is true and accurate to the best of my knowledge and belief. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sample Collector

Name Matt Dhabalt
Title Technician
Company CWM Company, Inc.
Address 701 South Grand Ave. West
City Springfield
State IL
Zip Code 62704
Phone 217-522-8001
Signature [signature]
Date 4-4-14

Laboratory Representative

Name Kelly Culhane
Title Project Manager
Company Suburban Laboratories, Inc.
Address ~~414 Litt Drive~~ 1950 S. Batavia Ave. Ste 15
City ~~Hillside~~ Geneva
State IL
Zip Code ~~62704~~ 60134
Phone 708-544-3260
Signature K Culhane
Date 4-10-14

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APPENDIX F

STAGE 3 ACTUAL COSTS

SITE INVESTIGATION COMPLETION REPORT
DERSCH CROSLOWS
LAWRENCEVILLE, ILLINOIS

Owner/Operator and Licensed Professional Engineer/Geologist Budget Certification Form

I hereby certify that I intend to seek payment from the UST Fund for costs incurred while performing corrective action activities for Leaking UST incident 20050374. I further certify that the costs set forth in this budget are for necessary activities and are reasonable and accurate to the best of my knowledge and belief. I also certify that the costs included in this budget are not for corrective action in excess of the minimum requirements of 415 ILCS 5/57, no costs are included in this budget that are not described in the corrective action plan, and no costs exceed Subpart H: Maximum Payment Amounts, Appendix D Sample Handling and Analysis amounts, and Appendix E Personnel Titles and Rates of 35 Ill. Adm. Code 732 or 734. I further certify that costs ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 732.606 or 734.630 are not included in the budget proposal or amendment. Such ineligible costs include but are not limited to:

Costs associated with ineligible tanks.
Costs associated with site restoration (e.g., pump islands, canopies).
Costs associated with utility replacement (e.g., sewers, electrical, telephone, etc.).
Costs incurred prior to IEMA notification.
Costs associated with planned tank pulls.
Legal fees or costs.
Costs incurred prior to July 28, 1989.
Costs associated with installation of new USTs or the repair of existing USTs.

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MAY 22 2015
IEPA/BOL

Owner/Operator: Dersch Energies, Inc.

Authorized Representative: Tom Dersch Title: Owner

Signature: Pres. Dent Date: 5-11-2015

Subscribed and sworn to before me the 11 day of May, 2015.

Dorothy Dersch (Notary Public) Seal:

OFFICIAL SEAL
DOROTHY DERSCH
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES SEPT. 30, 2018

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MAY 28 2015
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In addition, I certify under penalty of law that all activities that are the subject of this plan, budget, or report were conducted under my supervision or were conducted under the supervision of another Licensed Professional Engineer or Licensed Professional Geologist and reviewed by me; that this plan, budget, or report and all attachments were prepared under my supervision; that, to the best of my knowledge and belief, the work described in the plan, budget, or report has been completed in accordance with the Environmental Protection Act [415 ILCS 5], 35 Ill. Adm. Code 732 or 734, and generally accepted standards and practices of my profession; and that the information presented is accurate and complete. I am aware there are significant penalties for submitting false statements or representations to the Illinois EPA, including but not limited to fines, imprisonment, or both as provided in Sections 44 and 57.17 of the Environmental Protection Act [415 ILCS 5/44 and 57.17].

L.P.E./L.P.G.: Vince E. Smith, P.E. L.P.E./L.P.G. Seal:

VINCE E. SMITH
2013
PERSON REGISTERED
PROFESSIONAL ENGINEER
ILLINOIS

L.P.E./L.P.G. Signature: Date: 5/15/15

Subscribed and sworn to before me the 15th day of May 2015.

(Notary Public) Seal:

OFFICIAL SEAL
CAROL L. ROWE
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 3-18-2017

The Illinois EPA is authorized to require this information under 415 ILCS 5/1. Disclosure of this information is required. Failure to do so may result in the delay or denial of any budget or payment requested hereunder.

Illinois Environmental Protection Agency

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General Information for the Budget and Billing Forms

LPC #: 1010155024 County: Lawrence

City: Lawrenceville Site Name: Croslow's Shell

Site Address: 1421 Lexington Avenue

IEMA Incident No.: 20050374

IEMA Notification Date: 3/17/2005

Date this form was prepared: Jun 10, 2014

This form is being submitted as a (check one, if applicable):

- ☒ Budget Proposal
- ☐ Budget Amendment (Budget amendments must include only the costs over the previous budget.)
- ☐ Billing Package

Please provide the name(s) and date(s) of report(s) documenting the costs requested:

Name(s):

Date(s):

This package is being submitted for the site activities indicated below:

35 Ill. Adm. Code 734:

- ☐ Early Action
- ☐ Free Product Removal after Early Action
- ☒ Site Investigation . . . . . Stage 1: ☐ Stage 2: ☐ Stage 3: ☒
- ☐ Corrective Action Actual Costs Actual

35 Ill. Adm. Code 732:

- ☐ Early Action
- ☐ Free Product Removal after Early Action
- ☐ Site Classification
- ☐ Low Priority Corrective Action
- ☐ High Priority Corrective Action

35 Ill. Adm. Code 731:

- ☐ Site Investigation
- ☐ Corrective Action

General Information for the Budget and Billing Forms

The following address will be used as the mailing address for checks and any final determination letters regarding payment from the Fund.

Pay to the order of: Dersch Energies, Inc. / Croslow's Shell

Send in care of: CWM Company, Inc.

Address: P.O. Box 571

City: Carlinville State: IL Zip: 62626

The payee is the: Owner ☒ Operator ☐ (Check one or both.)

Signature of the owner or operator of the UST(s) (required)

W-9 must be submitted.
Click here to print off a W-9 Form.

Number of petroleum USTs in Illinois presently owned or operated by the owner or operator; any subsidiary, parent or joint stock company of the owner or operator; and any company owned by any parent, subsidiary or joint stock company of the owner or operator:

Fewer than 101: ☒ 101 or more: ☐

Number of USTs at the site: 4 (Number of USTs includes USTs presently at the site and USTs that have been removed.)

Number of incidents reported to IEMA for this site: 2

Incident Numbers assigned to the site due to releases from USTs: 20050374

Please list all tanks that have ever been located at the site and tanks that are presently located at the site.

Product Stored in UST	Size (gallons)	Did UST have a release?	Incident No.	Type of Release Tank Leak / Overfill / Piping Leak
Gasoline	6,000	Yes ☒ No ☐	20050374	Tank Leak
Gasoline	6,000	Yes ☒ No ☐	20050374	Tank Leak
Gasoline	6,000	Yes ☒ No ☐	20050374	Tank Leak
Diesel Fuel	1,000	Yes ☐ No ☒		
Used Oil	560	Yes ☒ No ☐	2005-0374	Tank Leak
		Yes ☐ No ☐		
		Yes ☐ No ☐		
		Yes ☐ No ☐		
		Yes ☐ No ☐		

Add More Rows | Undo Last Add

Budget Summary

Choose the applicable regulation: (•) 734 ( ) 732

734	Free Product	Stage 1 Site Investigation	Stage 2 Site Investigation	Stage 3 Site Investigation	Corrective Action
				Actual	
Drilling and Monitoring Well Costs Form	$	$	$	$ 3,089.10	$
Analytical Costs Form	$	$	$	$ 2,163.33	$
Remediation and Disposal Costs Form	$	$	$	$ 1,170.00	$
UST Removal and Abandonment Costs Form	$	$	$	$	$
Paving, Demolition, and Well Abandonment Costs Form	$	$	$	$	$
Consulting Personnel Costs Form	$	$	$	$ 36,377.59	$
Consultant's Materials Costs Form	$	$	$	$ 1,436.60	$
Handling Charges Form	Handling charges will be determined at the time a billing package is submitted to the Illinois EPA. The amount of allowable handling charges will be determined in accordance with the Handling Charges Form.				
Total	$	$	$	$ 44,236.62	$

Drilling and Monitoring Well Costs Form

1. Drilling

Number of Borings to Be Drilled	Type HSA/PUSH/ Injection	Depth (feet) of Each Boring	Total Feet Drilled	Reason for Drilling
1	PUSH	15.00	15.00	On-site Soil Plume Delineation
1	HSA	15.00	15.00	On-site Soil and Groundwater Plume Delineation
3	HSA	15.00	45.00	Off-site Soil and Groundwater Plume Delineation

☐ Subpart H minimum payment amount applies.

	Total Feet	Rate per Foot ($)	Total Cost ($)
Total Feet via HSA:	60.00	26.91	1,614.60
Total Feet via PUSH:	15.00	21.06	315.90
Total Feet for Injection via PUSH:		17.55	
		Total Drilling Costs:	1,930.50

2. Monitoring / Recovery Wells

Number of Wells	Type of Well HSA / PUSH / 4" or 6" Recovery / 8" Recovery	Diameter of Well (inches)	Depth of Well (feet)	Total Feet of Wells to Be Installed ($)
4	HSA	2.00	15.00	60.00

Well Installation	Total Feet	Rate per Foot ($)	Total Cost ($)
Total Feet via HSA:	60.00	19.31	1,158.60
Total Feet via PUSH:		14.62	
Total Feet of 4" or 6" Recovery:		29.25	
Total Feet of 8" or Greater Recovery:		47.97	
		Total Well Costs:	1,158.60

Total Drilling and Monitoring Well Costs:	$3,089.10

Analytical Costs Form

Laboratory Analysis	Number of Samples		Cost ($) per Analysis		Total per Parameter
Chemical Analysis					
BETX Soil with MTBE EPA 8260	15	X	99.45	=	$1,491.75
BETX Water with MTBE EPA 8260	4	X	94.77	=	$379.08
COD (Chemical Oxygen Demand)		X		=	
Corrosivity		X		=	
Flash Point or Ignitability Analysis EPA 1010		X		=	
Fraction Organic Carbon Content (f_{oc}) ASTM-D 2974-00		X		=	
Fat, Oil, & Grease (FOG)		X		=	
LUST Pollutants Soil - analysis must include volatile, base/ neutral, polynuclear aromatics and metals list in Section 732. Appendix B and 734.Appendix B		X		=	
Dissolved Oxygen (DO)		X		=	
Paint Filter (Free Liquids)		X		=	
PCB / Pesticides (combination)		X		=	
PCBs		X		=	
Pesticides		X		=	
pH		X		=	
Phenol		X		=	
Polynuclear Aromatics PNA, or PAH SOIL EPA 8270		X		=	
Polynuclear Aromatics PNA, or PAH WATER EPA 8270		X		=	
Reactivity		X		=	
SVOC - Soil (Semi-Volatile Organic Compounds)		X		=	
SVOC - Water (Semi-Volatile Organic Compounds)		X		=	
TKN (Total Kjeldahl) "nitrogen"		X		=	
TPH (Total Petroleum Hydrocarbons)		X		=	
VOC (Volatile Organic Compounds) - Soil (Non-Aqueous)		X		=	
VOC (Volatile Organic Compounds) - Water		X		=	
		X		=	
		X		=	
		X		=	
		X		=	
		X		=	
Geo-Technical Analysis					
Soil Bulk Density (p_b) ASTM D2937-94		X		=	
Ex-situ Hydraulic Conductivity / Permeability		X		=	
Moisture Content (w) ASTM D2216-92 / D4643-93		X		=	
Porosity		X		=	
Rock Hydraulic Conductivity Ex-situ		X		=	
Sieve / Particle Size Analysis ASTM D422-63 / D1140-54		X		=	
Soil Classification ASTM D2488-90 / D2487-90		X		=	
Soil Particle Density (p_s) ASTM D854-92		X		=	
		X		=	
		X		=	
		X		=	

Analytical Costs Form

Metals Analysis					
Soil preparation fee for Metals TCLP Soil (one fee per soil sample)		X		=	
Soil preparation fee for Metals Total Soil (one fee per soil sample)		X		=	
Water preparation fee for Metals Water (one fee per water sample)		X		=	
Arsenic TCLP Soil		X		=	
Arsenic Total Soil		X		=	
Arsenic Water		X		=	
Barium TCLP Soil		X		=	
Barium Total Soil		X		=	
Barium Water		X		=	
Cadmium TCLP Soil		X		=	
Cadmium Total Soil		X		=	
Cadmium Water		X		=	
Chromium TCLP Soil		X		=	
Chromium Total Soil		X		=	
Chromium Water		X		=	
Cyanide TCLP Soil		X		=	
Cyanide Total Soil		X		=	
Cyanide Water		X		=	
Iron TCLP Soil		X		=	
Iron Total Soil		X		=	
Iron Water		X		=	
Lead TCLP Soil		X		=	
Lead Total Soil		X		=	
Lead Water		X		=	
Mercury TCLP Soil		X		=	
Mercury Total Soil		X		=	
Mercury Water		X		=	
Selenium TCLP Soil		X		=	
Selenium Total Soil		X		=	
Selenium Water		X		=	
Silver TCLP Soil		X		=	
Silver Total Soil		X		=	
Silver Water		X		=	
Metals TCLP Soil (a combination of all metals) RCRA		X		=	
Metals Total Soil (a combination of all metals) RCRA		X		=	
Metals Water (a combination of all metals) RCRA		X		=	
		X		=	
		X		=	
		X		=	
		X		=	
Other					
EnCore® Sampler, purge-and-trap sampler, or equivalent sampling device	15	X	11.70	=	$175.50
Sample Shipping per sampling event[1]	2	X	58.50	=	$117.00

[1]A sampling event, at a minimum, is all samples (soil and groundwater) collected in a calendar day.

Total Analytical Costs: $ 2,163.33

Remediation and Disposal Costs Form

A. Conventional Technology

Excavation, Transportation, and Disposal of contaminated soil and/or the 4-foot backfill material removal during early action activities:

Number of Cubic Yards	Cost per Cubic Yard ($)	Total Cost

Backfilling the Excavation:

Number of Cubic Yards	Cost per Cubic Yard ($)	Total Cost

Overburden Removal and Return:

Number of Cubic Yards	Cost per Cubic Yard ($)	Total Cost

B. Alternative Technology

Alternative Technology Selected:	
Number of Cubic Yards of Soil to Be Remediated	
Total Non-Consulting Personnel Costs Summary Sheet ($)	
Total Remediation Materials Costs Summary Sheet ($)	
Total Cost of the System	

Remediation and Disposal Costs Form

C. Groundwater Remediation and/or Free Product Removal System

Total Non-Consulting Personnel Costs Summary Sheet ($)	
Total Remediation Materials Costs Summary Sheet ($)	
Total Cost of the System	

D. Groundwater and/or Free Product Removal and Disposal

☐ Subpart H minimum payment amount applies.

Number of Gallons	Cost per Gallon ($)	Total Cost ($)

E. Drum Disposal

☐ Subpart H minimum payment amount applies.

Number of Drums of Solid Waste	Cost per Drum ($)	Total Cost ($)
4	292.50	1,170.00
Number of Drums of Liquid Waste	**Cost per Drum ($)**	**Total Cost ($)**
Total Drum Disposal Costs		1,170.00

Total Remediation and Disposal Costs:	$1,170.00

Consulting Personnel Costs Form

Employee Name	Personnel Title	Hours	Rate* ($)	Total Cost
Remediation Category	**Task**			
	Senior Project Manager	2.00	117.00	$234.00
Stage 3-Plan	Stage 3 Plan Review for Technical Compliance			
	Senior Prof. Engineer	3.00	152.10	$456.30
Stage 3-Plan	Stage 3 Plan Oversight & Coordination			
	Professional Geologist	4.00	107.63	$430.52
Stage 3-Plan	Stage 3 Plan Review for Design & Requisite			
	Senior Draftperson/CAD	6.00	70.19	$421.14
Stage 3-Plan	Stage 3 Plan Drawings / Proposed / St 1 Maps			
Christy Churchill (AET)	Administrative Assistant IV	6.00	40.00	$240.00
Stage 3-Plan	Copy, bind, and mail Site Investigation Stage 2/3 Plan and Budget			
Brian Williams (AET)	Professional Geologist	3.00	75.00	$225.00
Stage 3-Plan	Stage 3 Plan Review / Certification			
Brian Williams (AET)	Professional Geologist	40.00	75.00	$3,000.00
Stage 3-Plan	Prepare Site Investigation Phase 2/3 Work Plan and Budget			

Employee Name	Personnel Title	Hours	Rate* ($)	Total Cost
Remediation Category	**Task**			
	Senior Prof. Engineer	4.00	152.10	$608.40
Stage 3-Budget	Stage 3 Budget Certification			
	Senior Project Manager	16.00	117.00	$1,872.00
Stage 3-Budget	Stage 3 Budget / Oversight / Coordination / Technical Compliance			
	Professional Geologist	32.00	107.63	$3,444.16
Stage 3-Budget	Budget Calculations / Development			
	Senior Admin. Assistant	4.00	52.65	$210.60
Stage 3-Budget	Stage 3 Budget compilation, assembly and distribution			

Employee Name	Personnel Title	Hours	Rate* ($)	Total Cost
Remediation Category	**Task**			
	Senior Project Manager	6.00	117.00	$702.00
Stage 3-Field	Coordination / Technical Compliance / Scheduling			
	Senior Admin. Assistant	2.00	52.65	$105.30
Stage 3-Field	Office Prep., Scheduling, Arrangements for investigation			
	Professional Geologist	14.00	107.63	$1,506.82
Stage 3-Field	Off-site Drilling			
	Engineer III	14.00	117.00	$1,638.00
Stage 3-Field	Off-site Drilling Oversight			
	Project Manager	10.00	105.30	$1,053.00
Stage 3-Field	MW Surveying and Sampling			
	Technician IV	10.00	70.19	$701.90
Stage 3-Field	MW Surveying and Sampling			
	Senior Project Manager	8.00	117.00	$936.00
Stage 3-Field	Analytical Review/Field Reports/SI Doc/BL/WCR/Review			
	Senior Draftperson/CAD	6.00	70.19	$421.14
Stage 3-Field	Drafting Locations/Elevation and Contamination Levels/Drilling Prep.			
	Engineer I	6.00	87.74	$526.44
Stage 3-Field	BL and WCR Data Entry			

Employee Name	Personnel Title	Hours	Rate* ($)	Total Cost
Remediation Category	**Task**			
	Senior Project Manager	12.00	117.00	$1,404.00
Stage 3-Field	Off-site access / Drilling / Sampling coordination / Negotiation			
	Professional Geologist	16.00	107.63	$1,722.08
Stage 3-Field	Off-site results, SI Reports, Property Owner Correspondence			
	Senior Admin. Assistant	14.00	52.65	$737.10
Stage 3-Field	Office Prep., Scheduling, Arrangements for Off-site access			
	Engineer III	6.00	117.00	$702.00
Stage 3-Field	Log soil/groundwater analytical results			
	Senior Prof. Geologist	6.00	128.70	$772.20
Stage 3-Field	Hydraulic Conductivity / GW Flow Calcs			

Employee Name	Personnel Title	Hours	Rate* ($)	Total Cost
Remediation Category	**Task**			
	Senior Prof. Engineer	3.00	152.10	$456.30
SICR	SICR Certification			
	Senior Project Manager	6.00	117.00	$702.00
SICR	SICR oversight / Technical Compliance			
	Professional Geologist	45.00	107.63	$4,843.35
SICR	SICR			
	Engineer I	6.00	87.74	$526.44
SICR	SICR/Inputs			
	Senior Draftperson/CAD	16.00	70.19	$1,123.04
SICR	Drafting/Update and Complete Maps			
	Senior Admin. Assistant	4.00	52.65	$210.60
SICR	SICR Assembly/Distribution			

Employee Name	Personnel Title	Hours	Rate* ($)	Total Cost
Remediation Category	**Task**			
	Senior Prof. Engineer	4.00	152.10	$608.40
Stage 3-Pay	Stage 3 Reimbursement Certification			
	Senior Project Manager	16.00	117.00	$1,872.00
Stage 3-Pay	Stage 3 Reimbursement Oversight/Technical Compliance			
	Senior Acct. Technician	24.00	64.34	$1,544.16
Stage 3-Pay	Stage 3 Reimbursement Preparation			
	Senior Admin. Assistant	8.00	52.65	$421.20
Stage 3-Pay	Stage 3 Reimbursement Compilation, Assembly and Distribution			

*Refer to the applicable Maximum Payment Amounts document.

Total of Consulting Personnel Costs	$36,377.59

Consultant's Materials Costs Form

Materials, Equipment, or Field Purchase	Time or Amount Used	Rate ($)	Unit	Total Cost
Remediation Category	**Description/Justification**			
PID Rental	1.00	129.00	/day	$129.00
Stage 3-Field	To detect VOC levels in soil samples			
Survey Equipment Rental	1.00	75.00	/day	$75.00
Stage 3-Field	Survey monitor well elevations for groundwater flow calculations			
Water Level Indicator	2.00	21.00	/day	$42.00
Stage 3-Field	Test for groundwater during drilling activities/Measure static groundwater elevations			
Measuring Wheel	1.00	18.00	/day	$18.00
Stage 3-Field	Mapping sampling locations			
Mileage	620.00	.58	/mile	$359.60
Stage 3-Field	Two round trips from Springfield Office (1-Drilling, 1-Groundwater Sampling)			
Disposable Gloves	2.00	13.00	/box	$26.00
Stage 3-Field	Disposable gloves for soil and groundwater sampling			
Bailers	4.00	13.00	/each	$52.00
Stage 3-Field	Disposable bailers for monitoring well development and sampling			
Bailing Twine	1.00	5.00	/roll	$5.00
Stage 3-Field	String for Bailers			
Copies	200.00	.10	/each	$20.00
Stage 3-Field	Field/Plan/Maps/Borelogs/Analytical/Off-site			

Materials, Equipment, or Field Purchase	Time or Amount Used	Rate ($)	Unit	Total Cost
Remediation Category	**Description/Justification**			
Per diem	2.00	39.00	/each	$78.00
Stage 3-Field	Per diem for drilling /sampling activities			
Hotel	2.00	80.00	/each	$160.00
Stage 3-Field	Hotel stay for drilling /sampling activities			
Copies	250.00	.10	/each	$25.00
Stage 3-Budget	Copies of Budget / Draft / Final / Attachments / Forms			
Postage	2.00	5.00	/each	$10.00
Stage 3-Budget	Budget / Forms Distribution			
Copies	800.00	.10	/each	$80.00
Stage 3-Pay	Copies of Reimbursement Claim			
Postage	3.00	5.00	/each	$15.00
Stage 3-Pay	Distribution of Reimbursement Claim / forms			
Copies	1,000.00	.10	/each	$100.00
SICR	Copies of Report / Draft / Final / Attachments / Forms			
Postage	2.00	5.00	/each	$10.00
SICR	Report / Forms Distribution			
Copies	300.00	.10	/each	$30.00
Stage 3-Field	Off-site access requests / correspondences / reports			

Materials, Equipment, or Field Purchase	Time or Amount Used	Rate ($)	Unit	Total Cost
Remediation Category	**Description/Justification**			
Postage	20.00	5.00	/each	$100.00
Stage 3-Field	Off-site access requests / correspondences / reports / results / status			
Copies (AET)	600.00	.15	/copy	$90.00
Stage 3-Plan	Copies of Stage 3 Plan			
Postage (AET)	2.00	6.00	/each	$12.00
Stage 3-Plan	Stage 3 Plan/Forms Distribution			

Total of Consultant Materials Costs	$1,436.60

APPENDIX G

HYDRAULIC CONDUCTIVITY DETERMINATION

SITE INVESTIGATION COMPLETION REPORT
DERSCH CROSLOWS
LAWRENCEVILLE, ILLINOIS

Hydraulic Conductivity from Slug Test Data
using Bouwer and Rice Method

Project: Croslow's Shell - MW-1 Date: 10/24/2006
Calc. By: JME Chk'd by:

Well Column Diameter (2rc):		2.0	inches	Depth to water tbl(ft):	5.47
Sand Pack Diameter (2rw):		8.0	inches	Depth of well bot (ft):	20.00
Screened Length (Le):		10.0	feet	Ref Depth: top of riser	96
Aquifer Thickness (H):		18.00	feet	Depth/Xducer:	Depth
Water ht above screen bot (Lw):		14.13	feet		
Lw/rw:		42.4			
Le/rw:		30.0	ln(Le/rw):	3.40	
Bouwer-Rice Factors:	A:	2.37		4th Order Polynomial	
	B:	2.21		approximations to curves in	
	C:	1.81		1989 paper	
ln(Re/rw):	H=Lw:				
	H>Lw:	1.808			
Hydr. Cond. (cm/s)	H=Lw:			best fit slope:	0.00401
	H>Lw:	7.6718E-05			

	TIME(sec)	D sub n	h sub n	ln(h sub n)	ln(hn/hn-1)	ln(h/h-1)/t	Estimated Slope
1	0	0	5.47	1.70			
2	5	0.7	4.77	1.56	-0.136932	-0.027386	-0.0273865
3	10	1.2	4.27	1.45	-0.110732	-0.022146	-0.0247665
4	15	1.7	3.77	1.33	-0.124539	-0.024908	-0.0245469
5	20	2.14	3.33	1.20	-0.124103	-0.024821	-0.0245577
6	25	2.62	2.85	1.05	-0.155653	-0.031131	-0.0254998
7	30	2.86	2.61	0.96	-0.087969	-0.017594	-0.0249892
8	35	3.08	2.39	0.87	-0.088057	-0.017611	-0.0241616
9	40	3.32	2.15	0.77	-0.105826	-0.021165	-0.0235756
10	45	3.58	1.89	0.64	-0.128891	-0.025778	-0.0233974
11	50	3.7	1.77	0.57	-0.065597	-0.013119	-0.0228331
12	55	3.86	1.61	0.48	-0.094745	-0.018949	-0.0223581
13	60	3.98	1.49	0.40	-0.077458	-0.015492	-0.0218447
14	70	4.18	1.29	0.25	-0.144134	-0.014413	-0.0210398
15	80	4.33	1.14	0.13	-0.123614	-0.012361	-0.0200722
16	90	4.48	0.99	-0.01	-0.141079	-0.014108	-0.0192155
17	100	4.59	0.88	-0.13	-0.117783	-0.011778	-0.0184054
18	110	4.64	0.83	-0.19	-0.058496	-0.00585	-0.0174821
19	120	4.71	0.76	-0.27	-0.088107	-0.008811	-0.0166487
20	130	4.76	0.71	-0.34	-0.068053	-0.006805	-0.0068053
21	140	4.8	0.67	-0.40	-0.057987	-0.005799	-0.006302
22	150	4.83	0.64	-0.45	-0.04581	-0.004581	-0.0057354
23	160	4.84	0.63	-0.46	-0.015748	-0.001575	-0.0047899
24	170	4.85	0.62	-0.48	-0.016	-0.0016	-0.0040641
25	180	4.87	0.60	-0.51	-0.03279	-0.003279	-0.0037208
26	190	4.89	0.58	-0.54	-0.033902	-0.00339	-0.0035502
27	200	4.91	0.56	-0.58	-0.035091	-0.003509	-0.0034678
28	210	4.92	0.55	-0.60	-0.018019	-0.001802	-0.003335
29	220	4.93	0.54	-0.62	-0.018349	-0.001835	-0.0031944

30	230	4.94	0.53	-0.63	-0.018692	-0.001869	-0.0030623
31	240	4.94	0.53	-0.63	0	0	-0.0028815
32	250	4.95	0.52	-0.65	-0.019048	-0.001905	-0.00274
33	260	4.96	0.51	-0.67	-0.019418	-0.001942	-0.002628
34	270	4.97	0.50	-0.69	-0.019803	-0.00198	-0.0025388
35	280	4.98	0.49	-0.71	-0.020203	-0.00202	-0.0024674
36	290	4.99	0.48	-0.73	-0.020619	-0.002062	-0.0024102
37	300	5	0.47	-0.76	-0.021053	-0.002105	-0.0023644
38	320	5.02	0.45	-0.80	-0.043485	-0.002174	-0.002323
39	340	5.03	0.44	-0.82	-0.022473	-0.001124	-0.0022583
40	360	5.05	0.42	-0.87	-0.04652	-0.002326	-0.0022137
41	380	5.06	0.41	-0.89	-0.024098	-0.001205	-0.0021584
42	400	5.08	0.39	-0.94	-0.05001	-0.002501	-0.0021266
43	420	5.09	0.38	-0.97	-0.025975	-0.001299	-0.0020884
44	440	5.01	0.46	-0.78	0.191055	0.009553	-0.0018624
45	460						
46	480						
47	500						
48	520						
49	540						
50	560						
51	580						
52	600						
53	660						
54	720						
55	780						
56	840						
57	900						
58	960						
59	1020						

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829
BRUCE RAUNER, GOVERNOR LISA BONNETT, DIRECTOR

217/524-3300

CERTIFIED MAIL

7013 2630 0001 4708 7874

JUN 0 5 2015

Dersch Energies, Inc.
Mr. Tom Dersch
P.O. Box 217
Mt. Carmel, Illinois 62863

IEPA-DIVISION OF RECORDS MANAGEMENT
RELEASABLE

JUN 16 2015

REVIEWER: JKS

Re: LPC #1010155024—Lawrence County
Lawrenceville/ Dersch Croslow's Shell
1421 Lexington Avenue
Leaking UST Incident No. 20050374
Leaking UST Technical File

Dear Mr. Dersch:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the Site Investigation Completion Report (report) submitted for the above-referenced incident. This report, dated May 18, 2015, was received by the Illinois EPA on May 22, 2015. Citations in this letter are from the Environmental Protection Act (415 ILCS 5) (Act) and Title 35 of the Illinois Administrative Code (35 Ill. Adm. Code).

The Illinois EPA has determined that the requirements of Title XVI of the Act have been satisfied (Sections 57.7(a)(5) and 57.7(c) of the Act and 35 Ill. Adm. Code 734.505(b) and 734.510(a)). Therefore, the report is approved.

In addition, the actual costs budget for Stage 2 and 3 is approved for the amounts listed in Section 1 of Attachment A (Sections 57.7(a)(2) and 57.7(c) of the Act and 35 Ill. Adm. Code 734.505(b) and 734.510(b)). Be aware that the amount of payment from the Fund may be limited by Sections 57.8(d), 57.8(e), and 57.8(g) of the Act, as well as 35 Ill. Adm. Code 734.630 and 734.655.

Pursuant to Sections 57.7(b)(2) and (3) and 57.12(c) and (d) of the Act and 35 Ill. Adm. Code 734.100, 734.125, and 734.335(a), the Illinois EPA requires submittal of a Corrective Action Plan and budget within 30 days from the date of this letter to:

Illinois Environmental Protection Agency
Bureau of Land - #24
Leaking Underground Storage Tank Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794-9276

Please note that the Illinois EPA does not require the submission of a budget if the owner or operator does not intend to seek payment from the Underground Storage Tank Fund.

PETITIONER'S EXHIBIT F

PENGAD 800-631-6989

Please submit all correspondence in duplicate and include the Re: block shown at the beginning of this letter.

If you have any questions or need further assistance, please contact Brad Dilbaitis at (217) 785-8378 or Bradley.Dilbaitis@illinois.gov.

Sincerely,

Thomas A. Henninger
Unit Manager
Leaking Underground Storage Tank Section
Division of Remediation Management
Bureau of Land

TAH:BD\SICRappAC2&3app.docx

Attachment: Attachment A

c: CWM Company
BOL File

Attachment A

Re: LPC #1010155024—Lawrence County
Lawrenceville/ Dersch Croslow's Shell
1421 Lexington Avenue
Leaking UST Incident No. 20050374
Leaking UST Technical File

STAGE 2 and 3 Actual Costs

The following amounts are approved:

$3,089.10	Drilling and Monitoring Well Costs
$2,163.33	Analytical Costs
$1,170.00	Remediation and Disposal Costs
$0.00	UST Removal and Abandonment Costs
$0.00	Paving, Demolition, and Well Abandonment Costs
$36,377.59	Consulting Personnel Costs
$1,436.60	Consultant's Materials Costs

Handling charges will be determined at the time a billing package is reviewed by the Illinois EPA. The amount of allowable handling charges will be determined in accordance with Section 57.1(a) of the Environmental Protection Act (Act) and 35 Illinois Administrative Code (35 Ill. Adm. Code) 734.635.

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Updated April 2009

Instructions for the Budget and Billing Forms

The Illinois Environmental Protection Agency (Illinois EPA) has revised the *Budget and Billing Forms* for payment from the Underground Storage Tank Fund (Fund). The Illinois EPA's new forms shall be used for all budgets and applications for payment for all sites subject to 35 Illinois Administrative Code (35 Ill. Adm. Code) 734, 732, or 731, except as noted below. The *Budget and Billing Forms* reflect the amendments to 35 Ill. Adm. Code 732 and the adoption of 35 Ill. Adm. Code 734. When using these forms, please follow the instructions for each particular form that pertains to your site.

Maximum Payment Amounts

The Illinois EPA will only approve payment from the Fund for corrective action costs actually incurred up to the maximum amounts listed in Subpart H, Appendix D, and Appendix E of 35 Ill. Adm. Code 732 or 734—unless bidding is used or the unusual or extraordinary circumstance provisions are followed. The Subpart H, Appendix D, and Appendix E maximum payment amounts will be adjusted for inflation each year on the first day of July of that year. The first adjustment was made on July 1, 2006. The maximum amounts that are applicable for costs submitted in a budget are the amounts in effect on the date the Illinois EPA receives the budget. Please note that, once the Illinois EPA approves a cost, the applicable maximum payment amount for that cost may not be increased by proposing the cost in a subsequent budget (35 Ill. Adm. Code 732.870(d) or 734.870(d)). The maximum amounts that are applicable for costs not approved in a budget by the Illinois EPA, such as early action costs, are the amounts in effect on the date the costs were incurred.

Signature Requirements

For owners and operators other than individuals, a duly authorized representative must sign the forms on behalf of the owner or operator. For the following entities, the duly authorized representative must be one of the following persons:

1. For a corporation, a principal executive officer of at least the level of vice president, or a person authorized by a resolution of the board of directors to sign the applicable document if a copy of the resolution, certified as a true copy by the secretary of the corporation, is submitted with the document.
2. For a sole proprietorship, the sole proprietor.
3. For a partnership, a general partner.
4. For a municipality, state, federal, or other public agency, the head of the agency or a ranking elected official.
5. For a limited liability company, a member for a member-managed company and either a manager or a member for a manager-managed company.
6. For a land trust, a beneficiary of the land trust who meets the definition of "owner" or "operator" under 35 Ill. Adm. Code 731, 732, or 734.

Budgets

Title XVI of the Environmental Protection Act requires owners or operators to submit a budget prior to seeking payment from the Fund, except in the case of costs asso

with early action activities. Owners or operators of sites subject to 35 Ill. Adm. Code 731 are not required to submit budgets.

For owners or operators conducting site investigation pursuant to 35 Ill. Adm. Code 734, the certification that the costs of the Stage 1 investigation will not exceed the amounts set forth in Subpart H, Appendix D, and Appendix E serves as the budget for the Stage 1 site investigation. The actual costs for conducting the Stage 1 site investigation must be submitted on budget forms concurrently with the results of the Stage 1 site investigation and the next *Site Investigation Plan* and budget (submitted on its own budget forms) or with the *Site Investigation Completion Report* if the site investigation is complete. Likewise, the actual costs for conducting the Stages 2 and/or 3 site investigation must be submitted on budget forms concurrently with the results of the previous site investigation and the next *Site Investigation Plan* and budget (submitted on its own budget forms) or with the *Site Investigation Completion Report* if the site investigation is complete. When preparing budget forms, complete and submit only the pages that apply. If multiple budgets are included in one submittal, only one budget certification form is required.

Budget amendments to an approved budget must be submitted on the same forms as the original budget was submitted. Any new budgets for new activities shall be submitted on the Illinois EPA's new *Budget and Billing Forms*. These new forms should not be combined with other versions of *Budget and Billing Forms* and vice versa.

An original and one copy of the complete **budget** for sites subject to 35 Ill. Adm. Code 734 or 732 must be submitted with an associated plan. The forms may be copied; however, one form must include original signatures. The original and one copy should be mailed to:

Illinois Environmental Protection Agency
Bureau of Land - #24
Leaking UST Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Applications for Payment

If an owner or operator has received approval of a budget on old forms, the corresponding application for payment must be submitted on the old forms. Any new budgets for new activities and corresponding applications for payment shall be submitted on the Illinois EPA's new *Budget and Billing Forms*. These new forms should not be combined with other versions of *Budget and Billing Forms* and vice versa.

When submitting an application for payment, an accounting of all costs must be provided (i.e., invoices and receipts). Invoices and receipts must contain enough documentation to support the amount requested for payment from the Fund. Any costs not substantiated by invoices or receipts will not be paid. Invoices and receipts must include the date the work was performed and a breakdown of all costs with documentation of activities conducted and materials purchased. For example, an invoice from the accredited laboratory noting the date of sample collection, number of samples analyzed, amount charged, etc. is required for payment of analytical costs. If

the invoices and receipts do not contain detailed information, additional documentation must be submitted providing the required information. Invoices and receipts must also provide adequate documentation that the work approved in the applicable plan and budget was conducted.

Proof of payment of subcontractor costs can be shown in one of three ways:

1. Cancelled checks – photocopy of fronts and backs of cancelled checks.

    a. One payment per site to one payee for the entire amount of one invoice with a note indicating the date of the invoice and the invoice number being paid.

    b. One payment per site to one payee for the entire amount of several invoices with a note indicating the dates of the invoices, invoice numbers, and the amounts being paid on said invoices.

    c. Payment to one payee for multiple sites for the entire amount of several invoices with a note indicating the sites involved, including incident numbers, dates of the invoices, invoice numbers, and the amounts being paid on said invoices.

2. Lien waivers with the name of the company, invoices(s) being paid, date payment took place, and the amount(s) paid on said invoice(s) along with necessary signatures.

3. Affidavits with the name of the company, invoice(s) being paid, date payment took place, and the amount(s) paid on said invoice(s) along with necessary signatures.

Please note that an application for payment for site classification pursuant to 35 Ill. Adm. Code 732 cannot be submitted until a *Site Classification Completion Report* has been approved or approved with modifications by the Illinois EPA. Likewise, an application for payment for the previous stage of site investigation pursuant to 35 Ill. Adm. Code 734 cannot be submitted until either a *Site Investigation Plan* and budget for the next stage of investigation or a *Site Investigation Completion Report* (if further investigation is not required) has been approved or approved with modifications by the Illinois EPA.

The complete **application for payment** with original signatures for sites subject to 35 Ill. Adm. Code 734, 732, or 731 should be mailed to:

Illinois Environmental Protection Agency
Bureau of Land - #24
Leaking UST Claims Unit
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Pursuant to:	732 734	732 734	732 734	732 734	731 732 734	732	732	732 734	731 732 734
A complete budget or application for payment must include all of the forms listed below, as applicable:	Early Action Bill Package	Free Product Removal Budget	Free Product Removal Bill Package	Site Investigation or Classification Budget	Site Investigation or Classification Bill Package	Low Priority Budget	Low Priority Bill Package	Corrective Action (High Priority) Budget	Corrective Action (High Priority) Bill Package
General Information for the Budget and Billing Forms	P	B	P	B	P	B	P	B	P
Budget Summary		B		B		B		B	
Billing Summary	P		P		P		P		P
Drilling and Monitoring Well Costs Form	P	B	P	B	P			B	P
Analytical Costs Form	P	B	P	B	P	B	P	B	P
Remediation and Disposal Costs Form	P	B	P	B	P	B	P	B	P
Non-Consulting Personnel Costs Summary Sheet	P	B	P					B	P
Remediation Materials Costs Summary Sheet	P	B	P					B	P
UST Removal and Abandonment Costs Form	P		P					B	P
Paving, Demolition, and Well Abandonment Costs Form	P		P					B	P
Consulting Personnel Costs Form	P	B	P	B	P	B	P	B	P
Consultant's Materials Costs Form	P	B	P	B	P	B	P	B	P
Bid Summary and Contractor Certification Forms	P	B		B		B		B	
Handling Charges Form	P		P		P		P		P
Owner/Operator and Professional Engineer/Geologist Budget Certification Form		B		B		B		B	
Eligibility and Deductibility Determination	P	B	P	B	P	B	P	B	P
Payment Certification Form	P		P		P		P		P
Owner/Operator and Professional Engineer/Geologist Billing Certification Form	P		P		P		P		P
Private Insurance Coverage Questionnaire	P		P		P		P		P
Private Insurance Affidavit	P		P		P		P		P
W-9 Form	P		P		P		P		P
Women and Minority Business Enterprises Form	P		P		P		P		P
Copies of all bills and receipts for which payment is sought	P		P		P		P		P

P = Application for Payment only
B = Budget only

General Information for the Budget and Billing Forms

Complete the form with the requested information.

On the first page of the form, there is an area to designate the applicable regulations and the site activities for which the package is being submitted. If the site activities involved are those of a Stage 1 site investigation pursuant to 35 Ill. Adm. Code 734, the only submittal is that of actual costs. If the site activities involved are those of a Stage 2 and/or 3 site investigation pursuant to 35 Ill. Adm. Code 734, you must select from the drop-down box whether the submittal is that of actual costs (for work done during the previous stage of investigation) or a proposed budget.

On the second page of the form, include information pertaining to payment from the Fund (if eligible), such as where payment checks should be sent. Please note that only owners or operators of USTs are eligible for payment from the Fund. Therefore, payment can only be made to an owner or operator of the USTs. The Illinois EPA is not required to and will not recognize an assignment or other delegation of payment as justification for issuing payment to anyone other than the owner or operator. The address, as completed on this form, will be used as the mailing address for payment checks and any final determination letters regarding payment from the Fund.

When submitting an application for payment, you must always include a completed and signed W-9 form. In an effort to speed up review of your claim, it is suggested that the W-9 form always be submitted with every application for payment. As noted on the form, your name should be entered as shown on your income tax return.

Lastly, at the end of page 2 is a table to be completed by listing tanks that have ever been or are presently located at the site. Please note that there is only enough space for entry of one incident number. Therefore, if more than one incident number was assigned to a particular tank, multiple lines of the table must be used to list the additional incident numbers (as well as to indicate whether there was a release and, if so, the type of release associated with that incident number). For a tank with multiple incident numbers, it should somehow be indicated that the information pertains to the same tank. An example follows:

Product Stored in UST	**Size (gallons)**	**Did UST have a release?**	**Incident No.**	**Type of Release** Tank Leak / Overfill / Piping Leak
unleaded gasoline	10,000	Yes ☒ No ☐	888888	overfill
(same UST as above)		Yes ☒ No ☐	999999	piping leak
(same UST as above)		Yes ☒ No ☐	20000000	tank leak
diesel fuel	500	Yes ☒ No ☐	20000000	tank leak

Click, as instructed, if additional rows of the table are needed.

Budget Summary

Select the regulations (either Part 734 or Part 732) that apply to the owner or operator of the USTs for which the release was reported. The corresponding column headings will appear.

PART 734:

If Part 734 is selected, in each column, as appropriate, select from the drop-down box one of the following:

- "Proposed" if the budget is a proposed budget,
- "Actual" if the budget is a summary of actual costs incurred during the previous stage of site investigation, or
- "N/A" (not applicable) if the budget doesn't apply to that particular column heading.

Enter budget summary information in only the columns that apply to the budget at-hand. For example, if the proposed budget pertains to Stage 2 Site Investigation costs and accompanying it are actual costs of the Stage 1 Site Investigation, then "N/A" should be selected for columns labeled "Free Product," "Stage 3 Site Investigation," and "Corrective Action." Then, under the column labeled "Stage 1 Site Investigation," "Actual" should be selected from the drop-down box, and actual costs of the Stage 1 site investigation should be entered on the appropriate lines. Under the column labeled "Stage 2 Site Investigation," "Proposed" should be selected from the drop-down box, and proposed costs for Stage 2 of the site investigation should be entered on the appropriate lines. Following is an example, in part:

Choose the applicable regulation: ◉ 734 ○ 732

734	Free Product	Stage 1 Site Investigation	Stage 2 Site Investigation	Stage 3 Site Investigation	Corrective Action
	N/A	Actual	Proposed	N/A	N/A
Drilling and Monitoring Well Costs Form	$	$ 2,000.00	$ 2,000.00	$	$
Analytical Costs Form	$	$ 1,000.00	$ 1,000.00	$	$

Stage 1 site investigation budgets must always be submitted as actual costs incurred. The actual costs must be submitted with a proposed Stage 2 Site Investigation Plan, a Stages 2 and/or 3 Site Investigation Plan, or a Site Investigation Completion Report (if no additional site investigation is required after Stage 1).

The actual costs of Stage 2 (if Stage 2 was needed) must be submitted with the proposed Stage 3 Site Investigation Plan or Site Investigation Completion Report (if no additional work is required after Stage 2). The actual costs of Stage 3 (if Stage 3 was needed) must be submitted with a Site Investigation Completion Report. Please note that, if contingency work is proposed (to either complete a stage or carry out the next stage), costs of the contingency work must be submitted as proposed costs. See the Site Investigation Process flowchart and accompanying explanation for information about the various combinations of stages that may be encountered.

List the total dollar amount from each of the forms listed, as applicable. The "Total" will be automatically calculated.

PART 732:

If Part 732 is selected, budget summary information should be entered in only the column that applies to the budget at-hand. List the total dollar amount from each of the forms listed, as applicable. The "Total" will be automatically calculated.

Billing Summary

The total amounts from each individual form should be entered in the appropriate box. Please note that early action activities or corrective action conducted pursuant to 35 Ill. Adm. Code 731 neither requires nor allows for pre-approval of costs in a budget. Therefore, the first column of this form "$ Amount Approved in the Budget" will not be completed for Part 731 or early action applications for payment.

Drilling and Monitoring Well Costs Form

Section 1 – Drilling

Include in the "Rate per Foot ($)" drilling charge for advancement of a boring or the installation of a well all costs associated with advancing the boring including but not limited to all drilling labor (including driller, driller assistant or laborer, etc.), drill rig time, drill rig and operator travel time and per diem, driller mileage, mobilization, decontamination, Shelby tubes, soil boring abandonment, all remediation compound injection costs (including slurry preparation and mixing equipment), bentonite, boring surface patches, and concrete saw.

An indication must be made as to why each boring is being advanced (i.e., defining the extent of contamination, classification boring, installation of monitoring wells, investigation of migration pathways, injection of a remediation compound) and the drilling type (either hollow-stem auger/conventional [HSA], push-driven technologies [PUSH], or Injection).

If the Subpart H minimum payment amount applies, then the box should be checked indicating such. Upon doing so, the field for "Total Drilling Costs" zeroes out so that the total drilling costs can be entered manually. In addition, an asterisk appears, indicating that the total drilling costs have been adjusted to reflect one or more Subpart H minimum payment amounts. (More than one might apply if the proposed budget or actual costs budget includes more than one round of drilling.)

When the Subpart H minimum payment amount box is not checked, the "Total Drilling Costs" are automatically calculated.

Section 2 – Monitoring/Recovery Wells

Include in the "Rate per Foot ($)" charge all costs associated with the installation of a monitoring or recovery well (excluding drilling) including but not limited to costs associated with labor to install wells, all well materials (such as well casings, risers, screens, caps and plugs, filter packs, annular seals, surface seals, sand, gravel,

bentonite, concrete, well covers, and locks), and labor and equipment (including groundwater pump) for well development done by the driller.

Analytical Costs Form

Include in the "Cost ($) per Analysis" charge all costs associated with sample handling and analysis of each sample including but not limited to laboratory personnel, sample handling, sample preparation, all aspects of the laboratory analysis, sample jars and other sampling containers, sample kits, sample disposal fees, and reporting of sampling results. Include the number of samples for each parameter and the actual cost per analysis (up to the maximum total amount per sample listed in Appendix D of 35 Ill. Adm. Code 732 or 734).

For laboratory analyses not included in Appendix D, the Illinois EPA will determine reasonable maximum payment amounts on a site-specific basis.

Include in the soil sampling equipment charge all costs associated with sampling equipment including but not limited to EnCore sampler, purge-and-trap sampler, or equivalent sampling device.

Include in the sample shipping charge all costs associated with sample shipping including but not limited to transportation and/or delivery of samples to the laboratory (e.g., FedEx, UPS, or any other courier service), ice, coolers, and bubble wrap. The maximum total amount per sample listed in Appendix D is the maximum total amount for shipping all samples (soil and groundwater) collected in a calendar day.

Remediation and Disposal Costs Form

Section A – Conventional Technology

Excavation, Transportation, and Disposal of contaminated soil and/or the 4-foot backfill material removal during early action activities:

Include in the "Cost per Cubic Yard ($)" all costs associated with the excavation, transportation, and disposal of contaminated soil and/or backfill material exceeding the applicable remediation objectives including but not limited to all non-consulting personnel (subcontractors); trucker/equipment operator labor; trucker/equipment operator travel and per diems; truck charges; visqueen truck liner; backhoe charges; equipment (including concrete breaker); equipment mobilization; skid steer; concrete/asphalt excavation, transportation, and disposal; landfill charges; decontamination; barriers; cones; tape; permit fees; traffic control; and other materials and related expenses.

The volume of soil removed and disposed must be determined by the following equation using the dimensions of the resulting excavation:

Soil [(Excavation Length in feet x Excavation Width in feet x Excavation Depth in feet of contaminated soil) ÷ 27] x 1.05 bulking factor

A conversion factor of 1.5 tons/cubic yard will be used to convert tons to cubic yards.

The volume of soil removed from within four feet of the outside dimensions of the UST and disposed pursuant to early action provisions must be determined in accordance with Appendix C of 35 Ill. Adm. Code 732 or 734.

Backfilling the Excavation:

Include in the "Cost per Cubic Yard ($)" all costs associated with the purchase, transportation, and placement of clean material used to backfill the excavation resulting from the removal and disposal of soil, including but not limited to all non-consulting personnel (subcontractors), trucker/equipment operator labor, trucker/equipment operator travel and per diems, truck charges, visqueen truck liner, backhoe charges, equipment, equipment mobilization, backfill material (clay, sand, gravel), barriers, cones, tape, permit fees, traffic control, and other materials and related expenses.

The volume of backfill material must be determined by the following equation using the dimensions of the backfilled excavation:

Soil [(Excavation Length in feet x Excavation Width in feet x Excavation Depth in feet of contaminated soil) ÷ 27] x 1.05 bulking factor

A conversion factor of 1.5 tons/cubic yard will be used to convert tons to cubic yards.

The volume of backfill material used to replace soil removed from within four feet of the outside dimensions of the UST and disposed pursuant to early action provisions must be determined in accordance with Appendix C of 35 Ill. Adm. Code 732 or 734.

Overburden Removal and Return:

Include in the "Cost per Cubic Yard ($)" all costs associated with the removal and subsequent return of soil that does not exceed the applicable remediation objectives but whose removal is required in order to conduct corrective action, including but not limited to all non-consulting personnel (subcontractors), trucker/equipment operator labor, trucker/equipment operator travel and per diems, truck charges, visqueen truck liner, backhoe charges, equipment, equipment mobilization, barriers, visqueen, cones, tape, permit fees, traffic control, and other materials and related expenses.

The volume of soil removed and returned must be determined by the following equation using the dimensions of the excavation resulting from the removal of soil:

Overburden Soil [(Excavation Length in feet x Excavation Width in feet x Excavation Depth in feet of non-contaminated soil) ÷ 27]

A conversion factor of 1.5 tons/cubic yard will be used to convert tons to cubic yards.

Section B – Alternative Technology

This section must be used for any remediation technology other than conventional technology. Alternative technology includes but is not limited to soil vapor extraction, land-farming, bio-piles, low-temperature thermal desorption, air sparging, bio-sparging, in-situ bioremediation, chemical oxidation, or dual-phase extraction. Other alternative technologies may be proposed.

Include a time and materials breakdown of all costs. Include in the "Total Cost of the System" all costs including but not limited to all non-consulting personnel (subcontractors), equipment, materials, construction, installation, operation and maintenance, system shutdown and closure, and other expenses of the proposed remediation system. Maximum payment amounts for costs associated with alternative technology will be determined by the Illinois EPA on a site-specific basis.

Also include the information listed in the *Remediation System Information* document.

The volume of soil to be treated in-situ must be determined by the following equation:

Soil [(Length in feet x Width in feet x Depth in feet of contaminated soil) ÷ 27]

A conversion factor of 1.5 tons/cubic yard will be used to convert tons to cubic yards.

All materials, equipment, field purchases, and subcontractor costs must be listed on the *Remediation Materials Costs Summary Sheet* and *Non-Consulting Personnel Costs Summary Sheet*, and the totals from those forms should be placed on the "Total Cost of the System" line in Section B. All professional consultant time (design time, oversight time, etc.) must be listed on the *Consulting Personnel Costs Form*.

Section C – Groundwater Remediation and/or Free Product Removal System

This section must be used if a groundwater remediation and/or free product removal system (such as pump-and-treat or dual-phase vapor extraction) is proposed in a plan.

Include a time and materials breakdown of all costs. Include in the "Total Cost of the System" all costs including but not limited to all non-consulting personnel (subcontractors), equipment, materials, construction, installation, operation and maintenance, system shutdown and closure, and other expenses of the proposed removal system. Maximum payment amounts for costs associated with the proposed removal system will be determined by the Illinois EPA on a site-specific basis.

Also include the information listed in the *Remediation System Information* document.

All materials, equipment, field purchases, and subcontractor costs must be listed on the *Remediation Materials Costs Summary Sheet* and *Non-Consulting Personnel Costs Summary Sheet*, and the totals from those forms should be placed on the "Total Cost of the System" line in Section C. All professional consultant time (design time, oversight time, etc.) must be listed on the *Consulting Personnel Costs Form*.

Section D – Groundwater and/or Free Product Removal and Disposal

This section must be used if groundwater or free product is removed via vacuum truck or other similar method from a groundwater monitoring well, recovery well, or container (such as a drum).

Include in the "Cost per Gallon ($)" all costs associated with the removal, transportation, and disposal of free product or contaminated groundwater including but not limited to all

non-consulting personnel (subcontractors), truck driver labor, mobilization, vac truck, mileage, equipment, materials, disposal fees, and other related expenses.

If the Subpart H minimum payment amount applies, then the box should be checked indicating such. Upon doing so, the field for "Total Cost" zeroes out so that the total groundwater and/or free product removal and disposal cost can be entered manually. In addition, an asterisk appears, indicating that the total groundwater and/or free product removal and disposal cost has been adjusted to reflect the Subpart H minimum payment amount. (More than one might apply if the proposed budget or actual costs budget includes more than one round of groundwater and/or free product removal and disposal.)

When the Subpart H minimum payment amount box is not checked, the "Total Cost" is automatically calculated.

Section E – Drum Disposal

This section must be used whenever a solid or liquid waste generated as a result of corrective action (e.g., soil borings, water bailed for well development or sampling, or hand-bailed free product) is disposed in a 55-gallon drum.

Include in the "Cost per Drum ($)" all costs associated with drum disposal including but not limited to drum purchase, drum dolly, transportation, truck charge and mobilization, truck driver labor, and disposal fees.

If the Subpart H minimum payment amount applies, then the box should be checked indicating such. Upon doing so, the field for "Total Drum Disposal Costs" zeroes out so that the total drum disposal costs can be entered manually. In addition, an asterisk appears, indicating that the total drum disposal costs have been adjusted to reflect the Subpart H minimum payment amount. (More than one might apply if the proposed budget or actual costs budget includes more than one round of drum disposal.)

When the Subpart H minimum payment amount box is not checked, the "Total Drum Disposal Costs" are automatically calculated.

Non-Consulting Personnel Costs Form

(Note: For this form to function properly, Adobe Reader 8.0 is required.)

This form should only be used to list personnel costs that are not associated with professional consulting services. Professional consulting services (that is, services performed by the primary consulting firm) must be listed separately on the Consulting Personnel Costs Form. Do not include costs that are part of maximum payment amounts listed in the *Maximum Payment Amounts* sheets.

a. **Employee Name** – List the name of the employee (required for application for payment only).

b. **Personnel Title** – List the title of the employee. Personnel titles must be comparable to the task being performed.

c. **Hours** – List the number of hours worked or proposed to be worked for that particular task.

d. **Rate ($)** – List the hourly rate of the employee. Personnel costs must be based upon the work being performed, regardless of the title of the person performing the work.

e. **Total Cost** – Enter the total dollar amount requested for each task (Hours X Rate).

f. **Task** – Complete an individual line item for each task conducted. The following are some examples of tasks: remediation system installation, operation and maintenance, or alternative technology remediation construction. Provide additional details to supplement this information; for example, the details may include the number of trips for operation and maintenance, number of hours for each trip, and how often trips are proposed.

g. **Cumulative Total of Non-Consulting Personnel Costs Summary Sheet(s)** – Enter the total non-consulting personnel costs (the sum of all tasks).

Remediation Materials Costs Summary Sheet

(Note: For this form to function properly, Adobe Reader 8.0 is required.)

Include all costs for materials, equipment, and field purchases associated with a groundwater remediation and/or free product removal system and/or alternative technology. Such costs include but are not limited to remediation compounds, nutrients for in-situ bioremediation, and soil vapor extraction equipment.

a. **Materials, Equipment, or Field Purchase** – List all the materials, equipment, and field purchases used or proposed to be used that are not part of maximum payment amounts listed in the *Maximum Payment Amounts* sheets.

b. **Time or Amount Used** – List, if applicable, the amount of time or the number of individual items used.

c. **Rate ($)** – List the rate at which an item is charged.

d. **Unit** – List the unit of the rate charged, which may be hourly, daily, weekly, monthly, yearly, etc. or may be based upon an activity such as per foot, cubic yard, square foot, gallon, etc.

e. **Total Cost/Item** – List the total cost of the material, equipment, or field purchase.

f. **Subcontractor** – If a service is provided by a subcontractor, list the name of the subcontractor.

g. **Cumulative Total of Remediation Materials Costs Summary Sheet(s)** – Enter the total cost of all materials, equipment, and field purchases.

UST Removal and Abandonment Costs Form

This section applies to UST removal, abandonment, and disposal activities.

Include in the "Cost ($)" all costs associated with the excavation, removal, disposal, and/or abandonment of UST systems including but not limited to all non-consulting personnel (subcontractors), mobilization, equipment, materials, decontamination, barriers, cones, tape, PID, slurry, disposal fees, permit fees, and other related expenses.

Please list all tanks that have been removed from or abandoned at the site for which payment from the Fund is requested. The maximum total amount payable per UST is based on the UST volume, as prescribed in the regulations.

Paving, Demolition, and Well Abandonment Costs Form

Section A – Concrete and Asphalt Placement/Replacement

This section must be used for costs associated with concrete, asphalt, and paving installed as an engineered barrier, as well as for costs associated with the replacement of concrete, asphalt, and paving.

Include in the "Cost ($) per Square Foot" all costs associated with concrete, asphalt, and paving placement or replacement, including but not limited to all non-consulting personnel (subcontractors), placement or replacement labor, per diems, equipment, materials and delivery, base preparation/compaction/leveling, surface preparation and equipment, forms, and other related expenses. In addition, include in the accompanying plan or report documentation of the material (either asphalt, paving, or concrete), the depth of material, and the square footage of the asphalt, paving, or concrete being placed or replaced.

Section B – Building Destruction or Dismantling and Canopy Removal

This section must be used for costs associated with the destruction or the dismantling and reassembly of above grade structures.

Include in the "Unit Cost ($)" all costs including but not limited to all personnel (primary consultant and subcontractors), per diems, equipment, mobilization, truck charges, backhoe charges, materials, asbestos abatement, barriers, cones, tape, permit fees, and other related expenses. Payment will be determined on a time and materials basis.

The total cost for the destruction or the dismantling and reassembly of above grade structures must not exceed $10,000 per site. A time and materials breakdown of all costs must be submitted with the application for payment.

Section C – Well Abandonment

This section must be used for the abandonment of monitoring or recovery wells that are abandoned pursuant to regulations promulgated by the Illinois Department of Public Health at 77 Ill. Adm. Code 920.120. Please note that each monitoring well must be listed individually.

Include in the "Cost ($) per Foot" all costs including but not limited to all personnel (primary consultant and subcontractors), labor, per diems, transportation, equipment (including jackhammer), mobilization, bentonite, concrete, and other related expenses.

Consulting Personnel Costs Form

(Note: For this form to function properly, Adobe Reader 8.0 is required.)

Include all costs associated with professional consulting services (that is, services provided by the primary consulting firm). Personnel not directly part of the primary consulting firm must be listed on the *Non-Consulting Personnel Costs Form*.

In the "Personnel Title" fields, use the titles listed at Appendix E of 35 Ill. Adm. Code 732 or 734. The highest maximum hourly rate for each personnel title listed in Appendix E may be proposed in the budget, but the amount billed in the application for payment must be based upon the degree, licensing, and experience requirements identified in Appendix E.

Include in the "Rate ($)" the costs associated with professional consulting services provided by the primary consulting firm including but not limited to plan, budget, and report preparation, application-for-payment preparation, certifications, project oversight, and field activities.

A separate line should be used for each employee performing tasks in each remediation category.

a. **Employee Name** – List the name of the employee (required for application for payment only).

b. **Personnel Title** – Select the title of the employee using the personnel titles listed in Appendix E of 35 Ill. Adm. Code 732 or 734 (also listed in the *Maximum Payment Amounts/Personnel Titles and Requirements* document). Personnel titles must be comparable to the task being performed.

c. **Hours** – List the number of hours worked or proposed to be worked for that particular task.

d. **Rate ($)** – List the hourly rate of the employee. The rate may not exceed the maximum hourly rate listed in the applicable *Maximum Payment Amounts/Personnel Titles and Requirements* document. Personnel costs must be based upon the work being performed, regardless of the title of the person performing the work.

e. **Total Cost** – Enter the total dollar amount requested for each task (Hours X Rate).

f. **Remediation Category** – Select the appropriate remediation category abbreviation from the *Remediation Categories List* document that is applicable to each phase of corrective action that has been or is proposed to be performed.

g. **Task** – Complete an individual line item for each task conducted. The following are some examples of tasks: preparation of CAP and budget, site investigation fieldwork, operation and maintenance, alternative technology oversight, or

alternative technology remediation design. Provide additional details to supplement this information; for example, the details may include the number of trips for operation and maintenance, number of hours for each trip, and how often trips are proposed.

h. **Cumulative Total of Consulting Personnel Costs Form(s)** – Enter the total consulting personnel costs (the sum of all tasks).

Multiple pages of the form must be used if additional space is needed.

Consultant's Materials Costs Form

(Note: For this form to function properly, Adobe Reader 8.0 is required.)

Include on the form the costs associated with materials provided by the professional consulting service (that is, the primary consulting firm) including but not limited to lodging and per diems, mileage (or vehicle), private utility locator, permit fees, well survey fees, NFR Letter recording fees, manifests, copies, and other equipment and supplies (such as PID, FID, explosimeter, DO/ORP/pH meters, hand augers, cameras/photo development, gloves, plastic bags, decon kit [for consultant's nondisposable field equipment], equipment to survey wells, peristaltic pump, purge pump, rope, bailers, measure wheel, transducer, data logger, water level indicator/interface probe, plastic tubing, metal detector, and barricades).

a. **Materials, Equipment, or Field Purchase** – List all the materials, equipment, and field purchases used or proposed to be used that are not part of maximum payment amounts listed in the *Maximum Payment Amounts* sheets.

b. **Time or Amount Used** – List, if applicable, the amount of time or the number of individual items used.

c. **Rate ($)** – List the rate at which an item is charged.

d. **Unit** - List the unit of the rate at which an item is charged, if applicable. The unit may be hourly, daily, weekly, monthly, yearly, etc. The unit and unit rate may also be based on an activity such as per foot, cubic yard, square foot, gallon, etc.

e. **Total Cost** – List the total cost of materials, equipment, or field purchase.

f. **Remediation Category** – Enter the appropriate remediation category abbreviation from the *Remediation Categories List* document that is applicable to each phase of corrective action that has been or is proposed to be performed.

g. **Description/Justification** – Enter a description of the materials, equipment, or field purchase and/or justification for its use.

h. **Cumulative Total of Consultant's Materials Costs Form(s)** – Enter the total costs of all materials, equipment, and field purchases.

Multiple pages of the form must be used if additional space is needed.

Bid Summary Form

As an alternative to the maximum payment amounts set forth in Subpart H, Appendix D, and Appendix E of 35 Ill. Adm. Code 734 or 732, one or more payment amounts may be determined via bidding in accordance with 35 Ill. Adm. Code 734.855 or 732.855. Each bid must cover all costs included in the maximum payment amount that the bid is replacing.

The following items must be provided to the Illinois EPA with the associated budget:

1. A copy of the scope of work provided to the subcontractors requesting bids;
2. Copies of **all** bids received (a minimum of three bids is required unless unusual or extraordinary circumstances apply), accompanied by completed and signed *Contractor Certification Forms* and bid details; and
3. A completed and signed copy of the *Bid Summary Form*.

Contractor Certification Form

Whenever a job is bid, completed and signed *Contractor Certification Forms* must accompany the *Bid Summary Form*. Bid details should be attached.

Handling Charges Form

Handling charges for field purchases and subcontractor billings must be calculated based on the table below. **Handling charges do not need to be submitted in a budget.** Submit copies of invoices and/or receipts of the subcontractor charges and/or field purchase with an application for payment. Include a breakdown of the date the work was conducted, as well as documentation of all activities and materials purchases, with invoices and/or receipts. If the invoices and receipts do not contain this information, submit additional documentation providing this information.

Subcontract and Field Purchase Cost	**Eligible Handling Charges as a Percentage of Cost**
$1 - $5,000	12%
$5,001 - $15,000	$600 + 10% of amt. over $5,000
$15,001 - $50,000	$1,600 + 8% of amt. over $15,000
$50,001 - $100,000	$4,400 + 5% of amt. over $50,000
$100,001 - $1,000,000	$6,900 + 2% of amt. over 100,000

Miscellaneous Forms

The following forms should be completed, signed, and submitted, as applicable:

- Owner/Operator and Licensed Professional Engineer/Geologist Budget Certification Form
- Owner/Operator and Licensed Professional Engineer/Geologist Billing Certification Form
- Payment Certification Form
- Private Insurance Coverage Questionnaire and Private Insurance Affidavit

- Federal Taxpayer Identification Number and Legal Status Disclosure Certification Requirements
- Women and Minority Business Enterprises Form
- Personnel Weekly Work Sheet
- Materials Weekly Work Sheet

Reference Documents

The following reference documents should be used, as applicable, when completing budgets and/or applications for payment:

- Personnel Title Descriptions and Duties Summary
- Remediation Categories List
- Remediation System Information
- Maximum Payment Amounts (March 1, 2006 through June 30, 2006)
- Maximum Payment Amounts (July 1, 2006 through June 30, 2007)
- Maximum Payment Amounts (July 1, 2007 through June 30, 2008)

CPI Inflation Calculator

$ 142.00

in January 1991

has the same buying power as

$249.94

in January 2016

Calculate

Mobile Browser? View full screen.

About the CPI Inflation Calculator

The CPI inflation calculator uses the Consumer Price Index for All Urban Consumers (CPI-U) U.S. city average series for all items, not seasonally adjusted. This data represents changes in the prices of all goods and services purchased for consumption by urban households.