

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

JEET SINGH d/b/a)	
AMAN FOOD & GAS,)	
)	
Petitioner,)	
)	
v.)	PCB 17-051
)	(UST Appeal)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

CERTIFICATE OF RECORD ON APPEAL

Pursuant to 35 Ill. Adm. Code 105.116(b) and 105.410, the following constitutes an index of documents comprising the record:

PAGES	DOCUMENT	DATE
001-112	CWM Stage 2 Site Investigation Plan and Budget	07/22/2015
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393-412	CWM/Illinois EPA e-mails	12/09/2016
413-443	CWM/Illinois EPA e-mails	12/14/2016
444-445	CWM/Illinois EPA e-mails	01/10/2017
446-450	Illinois EPA Leaking UST Technical Review Notes	01/10/2017

451-469 Illinois EPA decision letter

01/26/2017

I, ERIC KUHLMAN, certify on information and belief that the entire record of the Respondent's decision, as defined in 35 Ill. Adm. Code 105.410(b), is hereby enclosed.

BY:

A handwritten signature in blue ink that reads "Eric Kuhlman". The signature is written in a cursive style and is positioned above a horizontal line.

Eric Kuhlman
Project Manager/Environmental Protection Engineer
Leaking Underground Storage Tank Section
Illinois Environmental Protection Agency

CW³M Company
Environmental Consulting Services

701 W. South Grand Avenue
Springfield, IL 62704

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

July 22, 2015

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

*1610455194 – Rock Island County
Aman Food and Gas
Incident # 20140247
Leaking UST Technical File*

**RE: LPC #1610455194—Rock Island County
Aman Food & Gas - Moline
1830 5th Avenue, Moline
Incident Number: 2014-0247
LUST Technical Reports—Stage 2 Site Investigation Plan and Budget**

Dear Mr. Kuhlman:

Enclosed, please find the Stage 2 Site Investigation Plan and Budget for the above-referenced site for Incident Number 2014-0247. In addition to including the proposed plan, the report documents all of the site investigation work that has taken place to date at the Aman Food & Gas site in Moline, Illinois.

In order to minimize, or ideally eliminate consulting costs to rewrite plans and budgets, we aim to design a plan and budget which will be approved on the first submittal and not require more personnel time. The Plan is based on our experience of what the Agency's Project Managers are looking for in such reports; however, should you require additional information, we are more than willing to work with you during the review process to satisfy your questions or clarifications.

Accordingly, we request this budget be reviewed in a manner consistent to the manner previously deemed appropriate and reasonable to the agency such as the budgets for incidents 2006-0366, 2007-1408, 2008-1202, 2008-1657, 2008-1543, 2009-1270, 2009-0929, 2009-1410, 2011-0837, 2011-0822, 2011-0516, and 2012-0575.

If you have any questions or require additional information, please contact Mr. Vince Smith or me at (217) 522-8001.

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701 W. South Grand Avenue
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400 West Jackson, Suite C
Marion, IL 62959
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Sincerely,

A handwritten signature in black ink, appearing to be 'Carol Rowe', with a long horizontal line extending to the right.

Carol Rowe, P.G.
Senior Environmental Geologist

xc: Mrs. Balbir Kaur & Mr. Jeet Singh, *Aman Food & Gas*
Mr. William T. Sinnott, *CW²M Company, Inc.*

STAGE 2 SITE INVESTIGATION PLAN AND BUDGET

Aman Food & Gas

Moline, Illinois
LPC # 1610455194— Rock Island County
Incident Number 2014-0247

Presented to:

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

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Prepared by:

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JULY 2015

CW²M Company, Inc.
Stage 2 Site Investigation Plan and Budget
Aman Food & Gas - Moline
LPC #1610455194 – Incident Number 2014-0247

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APPENDICES

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ACRONYMS AND ABBREVIATIONS

BETX	Benzene, Ethylbenzene, Toluene and Total Xylenes
CW ³ M	CW ³ M Company, Inc.
IEMA	Illinois Emergency Management Agency
IEPA	Illinois Environmental Protection Agency
Ill. Adm. Code	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
ISGS	Illinois State Geological Survey
ISWS	Illinois State Water Survey
mL	Milliliter
MTBE	methyl tert-butyl ether
MW	Monitoring Well
OSFM	Office of the State Fire Marshal
PVC	Polyvinyl Chloride
SB	Soil boring
SICR	Site Investigation Completion Report
SIP	Site Investigation Plan and Budget
SWAP	Source Water Assessment Program
TACO	Tiered Approach to Corrective Action Objectives
USTs	Underground storage tank
WCRs	Well Completion Report

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1. SITE HISTORY/EXECUTIVE SUMMARY

1.1. GENERAL

Mr. Jeet Singh, representative of the owner of the underground storage tanks (USTs) at the Aman Food & Gas / Moline site, reported a release to the Illinois Emergency Management Agency (IEMA). Incident Number 2014-0247 was assigned to the notification on March 3, 2014. Mr. Singh and Ms. Balbir Kaur then requested CW³M Company, Inc. (CW³M) to proceed with the reporting and early action requirements in accordance with 35 Illinois Administrative Code (Ill. Adm. Code) § 734. This Stage 2 Site Investigation Plan (SIP) is being prepared in response to Incident Number 2014-0247.

The 20-Day Certification was submitted to the Illinois Environmental Protection Agency (IEPA) on March 7, 2014 (CW³M, 2014). In order to allow for the installation of new tanks which were going to be installed following UST removal, an extension of the 45-Day Reporting period was requested on April 17, 2014 (CW³M, 2014a), and approved by the IEPA on April 28, 2014 (IEPA, 2014). The 45-Day Report was submitted on May 2, 2014 (CW³M, 2014b) and approved on August 29, 2014 (IEPA, 2014a), with a 45-Day Report Addendum being submitted on June 2, 2014 (CW³M, 2014c).

This Stage 2 SIP and Budget has been prepared in accordance with the requirements of 35 Ill. Adm. Code 734. IEPA-provided, computer-generated forms have been used and are included herein as Appendix A. The proposed budget and certification are included herein as Appendix C.

The investigation will be 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 Aman Food & Gas - Moline, is located at 1830 5th Avenue, Moline, Rock Island County, Illinois 61265. The site is located in the SW ¼ of the SE ¼ of the NE ¼ of Section 32, Township 18 North of the Centralia Baseline and Range 1 West of the Fourth Principal Meridian.

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1.3. TANK REMOVAL ACTIVITIES

A permit for the removal of three USTs and product piping was approved by the Office of the State Fire Marshal (OSFM) on March 11, 2014 (OSFM, 2014). CW³M personnel were at the site to initiate tank removal activities starting Wednesday April 30, 2014. Due to scheduling conflicts trying to arrange the removal of the tanks to coincide with the installation of new tanks, CW³M was unable to complete the Early Action Requirements set forth in 35 Ill. Adm. Code 734 and Illinois Compiled Statutes (ILCS) 5/57-57.17 in the allotted 45-day time period. A request for an extension of time to complete these activities was sent to the IEPA April 17, 2014 (CW³M, 2014a) and approved by the IEPA on April 28, 2014 (IEPA, 2014).

CW³M personnel were at the site on April 30, 2014, to begin UST tank removal early action activities. OSFM Tank Specialist Jeffery Hindman and CW³M personnel were at the site to supervise the removal of the USTs on May 1, 2014. The tanks were ventilated and removed along with the product piping. As the OSFM Field Specialists have been instructed not to make the official determination of the release, the source of release was made in consult with the OSFM Field Specialist using the best professional judgment of field personnel of the tank, piping, and soil conditions.

Tank 1: This fiberglass tank was found to be in fair condition. The tank had no visible holes or pitting. OSFM Tank Specialist Hindman in conjunction with CW³M personnel determined that overfills and piping were contributing factors to the cause of the petroleum release.

Tank 2: This fiberglass tank was found to be in fair condition. The tank had no visible holes or pitting. OSFM Tank Specialist Hindman in conjunction with CW³M personnel determined that overfills and piping were contributing factors to the cause of the petroleum release.

Tank 3: This fiberglass tank was found to be in fair condition. The tank had no visible holes or pitting. OSFM Tank Specialist Hindman in conjunction with CW³M personnel determined that overfills and piping were contributing factors to the cause of the petroleum release.

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Table 1-1. Underground Storage Tank Summary

Tank Number	Tank Volume (gallons)	Tank Contents	Incident Number	Release Information	Status
1	5,000	Gasoline	2014-0247	Overfills, Piping	Removed 5/1/2014
2	3,000	Gasoline	2014-0247	Overfills, Piping	Removed 5/1/2014
3	4,000	Gasoline	2014-0247	Overfills, Piping	Removed 5/1/2014
4	4,000	Gasoline	-	-	In Use: Installed 5/13/2014
5	6,000	Gasoline	-	-	In Use: Installed 5/13/2014

1.4. EARLY ACTION SUMMARY

Following IEMA notification of the release, Mr. Jeet Singh and Ms. Balbir Kaur requested that CW³M proceed with reporting requirements and early action activities in accordance with 35 Ill Adm. Code 734.

While on site on March 3, 2014, CW³M personnel inspected the USTs and accessible components and obtained a release confirmation/waste characterization samples. The samples had strong visual and olfactory indications of petroleum contamination. The sample results revealed elevated levels of the gasoline fuel indicator contaminants known as benzene, ethylbenzene, toluene, and total xylenes (BETX), which confirmed a release of gasoline had occurred at the site. This waste characterization sample is also required by the landfill in order to accept the contaminated tank pit fill material as special waste. The results have been tabulated in Appendix F.

Approximately 771.04 tons (514.03 cubic yards) of contaminated backfill was removed from the former tank pit and properly disposed of at the Upper Rock Island Landfill facility in Rock Island, Illinois. Manifests for the contaminated soil disposal were included in the 45-Day Report Addendum (CW³M, 2014c). Samples were collected for every 20 feet of the excavation walls in addition to every 20 feet of piping runs. Floor samples were obtained beneath each tank. Samples were collected and analyzed for BETX, and methyl

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tert-butyl ether (MTBE). The early action soil analytical results are tabulated in Appendix F. The analytical results confirmed that the most stringent Tier 1 Clean-up Objectives have been exceeded from the release for all BETX contaminants.

1.5. SITE INVESTIGATION EXECUTIVE SUMMARY

Soil analytical results from Stage 1 investigation activities indicate that the Clean-Up Objectives for the site have not been exceeded in areas other than the tank pit, but remains undefined to the north-northwest of the tank pit. Soil contamination is therefore undefined, pending the sampling proposed on the northwest corner of the property.

Groundwater analytical results from the Stage 1 investigation indicate that Class I Groundwater Objectives were exceeded at MW-3 for the gasoline indicator contaminant benzene. Therefore, the groundwater plume remains undefined on-site adjacent to MW-3. This Stage 2 SIP proposes monitoring well locations in an attempt to complete and more narrowly define the on-site groundwater plume, where possible.

Off-site soil and groundwater investigation activities will be proposed in the Stage 3 SIP, if necessary, once the Stage 2 investigation activities have been completed.

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2. SITE CHARACTERIZATION

2.1. CURRENT AND PROJECTED POST-REMEDATION USES

The site lies near the river front of the city of Moline at the intersection of 5th Avenue and 19th Street. The site is surrounded by light commercial properties and a large apartment complex. The Aman Food & Gas site is currently operating as a convenience store that sells fuel.

2.2. PHYSICAL SETTING

The physical setting including environmental, geologic, hydrogeologic, hydrologic, geographic and topographic conditions has been described in the 45-Day Report (CW³M, 2014b). Additionally, this information is supplemented by the boring logs and Well Completion Reports (WCRs) from the Stage 1 investigation included in Appendix E of this report.

3. SITE INVESTIGATION RESULTS

3.1. DESCRIPTION OF ACTIVITIES COMPLETED

On October 1, 2014, CW³M personnel were on site to conduct the Stage 1 investigation. MW-1 through MW-5 were drilled, and MW-1 through MW-4 were sampled for soil contamination. Additionally, SB-1 through SB-3 were drilled and sampled for soil contamination. All soil samples were collected from each drilling location and analyzed for BETX and MTBE. CW³M personnel returned to the site on December 11, 2014, to survey and groundwater sample the monitoring wells, MW-1 through MW-5. Groundwater samples were analyzed for BETX and MTBE. Soil boring logs and WCRs are included in Appendix E. Analytical results are summarized and included in Appendix F.

3.2. GROUNDWATER FLOW DIRECTION

Static water elevations were measured for each well. The well locations were surveyed to determine relative surface elevations. The data collected has been used to determine relative groundwater elevations and the groundwater flow direction. Generally, static groundwater elevations do not stabilize on the date of well installation and well development procedures interfere with determination of static elevation. As a result, an

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additional trip to the site is required to sample and survey the monitoring wells. Based on activities completed to date, it appears that the groundwater flow direction is toward the east-northeast. The groundwater flow direction will continue to be evaluated as additional monitoring wells are installed during the remainder of the site investigation activities.

3.3. POTABLE WATER SUPPLY SURVEY

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 is has been conducted. The Illinois State Water Survey (ISWS), the Illinois State Geological Survey (ISGS) and the IEPA Division of Public Water Supplies were contacted via the Source Water Assessment Program (SWAP) online.

The ISGS, ISWS, and IEPA Division of Public Water Supplies were accessed online on March 13, 2014 (EPA.STATE.IL.US, 2014). The response indicated that ten ISGS wells are located within 2,500 feet of the site. The response stated that there is a groundwater ordinance for the entire City of Moline (R10083101).

Table 3-1. Water Supply Well Information

Well ID	Type	Distance From USTs (feet)	Setback Zone (feet)
00672	ISGS	2,429	200
00865	ISGS	1,056	200
23575	ISGS	1,848	200
23569	ISGS	2,059	200
23570	ISGS	2,059	200
23571	ISGS	2,059	200
23572	ISGS	2,429	200
23573	ISGS	2,429	200
23574	ISGS	2,429	200
00328	ISGS	475	200

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3.4. SITE SPECIFIC PHYSICAL PARAMETERS

In accordance with 35 Ill. Adm. Code 734.410, remediation objectives will be determined in accordance with 35 Ill. Adm. Code 742. The site specific physical parameters have not yet been determined, however, the parameters below are proposed to be determined at this time.

*Hydraulic Conductivity (K),
Soil bulk density (ρ_b),
Soil particle density (ρ_s),
Moisture content (w),
Organic carbon content (f_{oc})*

In order to determine the hydraulic conductivity, a slug test will be performed during the Stage 2 Site Investigation activities. The test will be performed by lowering a "slug" constructed of polyvinyl chloride (PVC) into a monitoring well. When the slug is lowered into the well, the groundwater is displaced by the volume of the slug. As the water within the well equilibrates, water depth changes are recorded in relation to the time interval that has passed since the test was initiated.

The hydraulic conductivity calculations are based on the total well depth, screen length and radius, initial water depth and the water depth change over time. The depth-to-water changes over time will be plotted on a semi-logarithmic graph and the curve will be evaluated. The slope of the straight-line portion of the curve, along with the other slug test data, is used to calculate the hydraulic conductivity.

Velocity will then be calculated using the hydraulic conductivity results determined at the site, as well as the hydraulic gradient. The hydraulic gradient will be found by calculating the change in gradient between the most up-gradient well and the most down-gradient well, then dividing this answer by the distance in feet between the two wells. Formula R24, ($U_{gw} = K \cdot i$) of 35 Ill. Adm. Code § 742 Appendix C, Table C.

The other site-specific physical parameters will be determined by conducting a boring near the vicinity of MW-2. Those parameters will be determined via laboratory testing.

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4. SITE INVESTIGATION PROPOSAL

4.1. DESCRIPTION OF ACTIVITIES PROPOSED

The location and number of borings are based on the anticipated degree and extent of soil and groundwater contamination. A total of two wells, one with a soil sample, are currently being proposed to determine the horizontal and vertical extent of contamination on-site. One soil boring is also being proposed to determine the extent of contamination at the northwest corner of the property, as well as one additional boring being proposed for collection of a Tiered Approach to Corrective Action Objectives (TACO) sample, near MW-2. The locations of the proposed monitoring wells are shown on Drawing 0006A and the location of the proposed soil borings is shown on Drawing 0005B. Both drawings are located in Appendix B. The proposed location of these borings will be completed as accurately as possible; however, their locations may be adjusted due to actual site and field conditions during the investigation.

4.2. DRILLING METHOD

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

4.3. MONITOR WELL INSTALLATION AND DEVELOPMENT PROTOCOL

Two-inch diameter wells consist of a 10-foot PVC screen and PVC riser above the well screen. Annular space around the wells is filled with coarse-grained, 20/20, sand. Each well is completed at the surface with a flush-mount manway and a locking protective cover. The manways are slightly elevated and the concrete sloped away from each well to prevent surface water run-in. The elevations of the manways are surveyed to the nearest 0.01 foot.

Monitoring wells are 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 are developed by surging the bailer back and forth for several minutes and then withdrawing groundwater. The development process continues until clear water flows into each well. The purpose of the surging was to remove the undersize sediment from the well and filter pack. All wells are developed on the day of installation.

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4.4. GROUNDWATER SAMPLING PROTOCOL

All samples are collected utilizing proper sampling protocol. Samplers wear clean, disposable latex gloves, which are changed between each sample. The water level in each newly installed well is 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 are 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 to the laboratory. Proper chain-of-custody procedures are followed. Each sample is labeled immediately upon collection and logged onto the chain-of-custody form. The chain-of-custody form is transported with the samples and then relinquished to the laboratory. The data collected is used to determine the groundwater flow direction and whether the applicable groundwater quality standards are exceeded.

5. 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 the locations of proposed boring and monitoring wells are included in Appendix B. All maps are prepared in accordance with 35 Ill. Adm. Code 734.440.

A map of the site and any surrounding areas that may be adversely affected by the release of petroleum from the UST systems will be provided in the Site Investigation Completion Report (SICR). At a minimum, the map will be to scale, oriented north at the top, and will show the location of the leaking UST systems with any associated piping and all potential natural and/or man-made pathways which are on the site, in right-of-ways attached to the site, or that are in areas that may be adversely affected as a result of the release.

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6. SITE INVESTIGATION COMPLETION REPORT

Mr. Jeet Singh and Mrs. Balbir Kaur, representative for Aman Food & Gas, owner of the USTs at the Moline site, in conjunction with CW³M Company, Inc., will prepare a SICR within 30 days of completion of site investigation activities. A description of sampling activities, geologic information, soil boring logs, WCRs, and analytical results will be included. The SICR will be prepared utilizing all applicable IEPA-prescribed, provided or approved forms.

A Stage 3 SIP to evaluate the extent of the plume that has migrated off-site will be prepared once the on-site plume is defined, if necessary.

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7. REFERENCES

CW³M, 2014. CW³M Company, Inc. 20-Day Certification. Aman Food & Gas, Moline, Illinois, March 7, 2014.

CW³M, 2014. CW³M Company, Inc. Request for Extension of Early Action Period. Aman Food & Gas, Moline, Illinois, April 17, 2014.

CW³M, 2014b. CW³M Company, Inc. 45-Day Certification. Aman Food & Gas, Moline, Illinois, May 2, 2014.

CW³M, 2014c. CW³M Company, Inc. 45-Day Report Addendum. Aman Food & Gas, Moline, Illinois, June 2, 2014.

EPA.STATE.IL.US, 2014. Source Water Assessment Program, Water Well Survey Map www.maps.epa.state.il.us, accessed March 13, 2014.

IEPA, 2014. Illinois Environmental Protection Agency, Early Action Correspondence, Aman Food & Gas, Moline, Illinois, April 28, 2014.

IEPA, 2014a. Illinois Environmental Protection Agency, 45-Day Report Correspondence, Aman Food & Gas, Moline, Illinois, August 29, 2014.

OSFM, 2014. Illinois Office of the State Fire Marshal, Permit for Removal of Underground Storage Tanks(s), Aman Food & Gas, Moline, Illinois, March 11, 2014.

APPENDIX A

SITE INVESTIGATION PLAN FORM

STAGE 2 SITE INVESTIGATION PLAN AND BUDGET

**AMAN FOOD & GAS
MOLINE, ILLINOIS**



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 Site Investigation Plan

A. Site Identification

IEMA Incident # (6- or 8- digit): 2014-0247 IEPA LPC # (10- digit): 1610455194

Site Name: Aman Food & Gas

Site Address (not a P.O. Box): 1830 5th Avenue

City: Moline County: Rock Island Zip Code: 61265

Leaking UST Technical File

B. Site Information

- 1. Will the owner or operator seek payment from the Underground Storage Tank Fund? Yes No
- 2. If yes, is the budget attached? Yes No

C. Site Investigation

Provide the following:

- 1. Stage of investigation
 - a. Stage 2
 - b. Stage 3
- 2. Summary of Stage 1 or 2 site investigation activities;
- 3. Characterization of site and surrounding area:
 - a. Current and projected post-remediation uses;
 - b. Physical setting:
 - i. Environmental conditions;
 - ii. Geologic, hydrogeologic, and hydrologic conditions; and
 - iii. Geographic and topographic conditions;
- 4. Results of Stage 1 or 2 site investigation:
 - a. Map(s) showing locations of all borings and groundwater monitoring wells completed to date and groundwater flow direction;
 - b. Map(s) showing locations of all samples collected;
 - c. Map(s) showing extents of soil and groundwater contamination that exceeds the most stringent Tier 1 remediation objectives;
 - d. Cross-section(s) showing the geology and the horizontal and vertical extents of soil and groundwater contamination that exceeds the most stringent Tier 1 remediation objectives;
 - e. Analytical results, chain of custody forms, and laboratory certifications;

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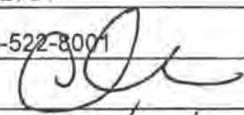
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- f. Table(s) comparing analytical results to the most stringent Tier 1 remediation objectives (include sample depth, date collected, and detection limits);
 - g. Potable water supply well survey (unless provided in previous plan):
 - i. Map(s) to scale showing:
 - a) Locations of community water supply wells and other potable wells and the setback zone for each well;
 - b) Location and extent of regulated recharge areas and wellhead protection areas;
 - c) Extent of groundwater contamination exceeding the most stringent Tier 1 remediation objectives; and
 - d) Modeled extent of groundwater contamination exceeding the most stringent Tier 1 remediation objectives (if performed as part of site investigation);
 - ii. Table(s) listing the setback zones for each community water supply well and other potable water supply wells;
 - iii. A narrative identifying each entity contacted to identify potable water supply wells, the name and title of each person contacted, and any field observations associated with any wells identified; and
 - iv. A certification from a Licensed Professional Engineer or Licensed Professional Geologist that the survey was conducted in accordance with the requirements and that documentation submitted includes information obtained as a result of the survey;
 - h. Soil boring logs and monitoring well construction diagrams;
 - i. Proposal for determining the following parameters:
 - i. Hydraulic conductivity (K);
 - ii. Soil bulk density (ρ_b);
 - iii. Soil particle density (ρ_s);
 - iv. Moisture content (w); and
 - v. Organic carbon content (f_{oc}); and
 - j. Budget forms of actual costs (documenting actual work performed during the previous stage).
5. Stage 2 or 3 sampling plan:
- a. Description of and justification for additional activities proposed as part of the plan;
 - b. A map depicting locations of proposed borings and groundwater monitoring wells; and
 - c. Depth of borings/wells and construction details of proposed borings and wells; and
6. Site maps meeting the requirements of 35 Ill. Adm. Code 734.440.

LOCAL GOVERNMENT

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	Consultant
Name: <u>Aman Food & Gas</u>	Company: <u>CWM Company</u>
Contact: <u>Balbir Kaur</u>	Contact: <u>Carol L. Rowe</u>
Address: <u>5048 Country Court</u>	Address: <u>701 South Grand Avenue West</u>
City: <u>Davenport</u>	City: <u>Springfield</u>
State: <u>IA</u>	State: <u>IL</u>
Zip Code: <u>61265</u>	Zip Code: <u>62704</u>
Phone: <u>563-275-8189</u>	Phone: <u>217-522-8001</u>
Signature: <u>BALBIR KAUR</u>	Signature: 
Date: <u>7/11/15</u>	Date: <u>7/21/2015</u>

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].

RECEIVE

L.P.E. or L.P.G. Seal JUL 23 2015

IEPA/BO

Licensed Professional Engineer or Geologist

Name: Vince E. Smith

Company: CWM Company

Address: 701 South Grand Avenue West

City: Springfield

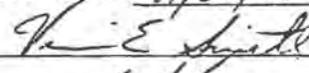
State: IL

Zip Code: 62704

Phone: 217-522-8001

Ill. Registration No.: 062-48118

License Expiration Date: 11/30/15

Signature: 

Date: 7/21/15



APPENDIX B

SITE MAPS AND ILLUSTRATIONS

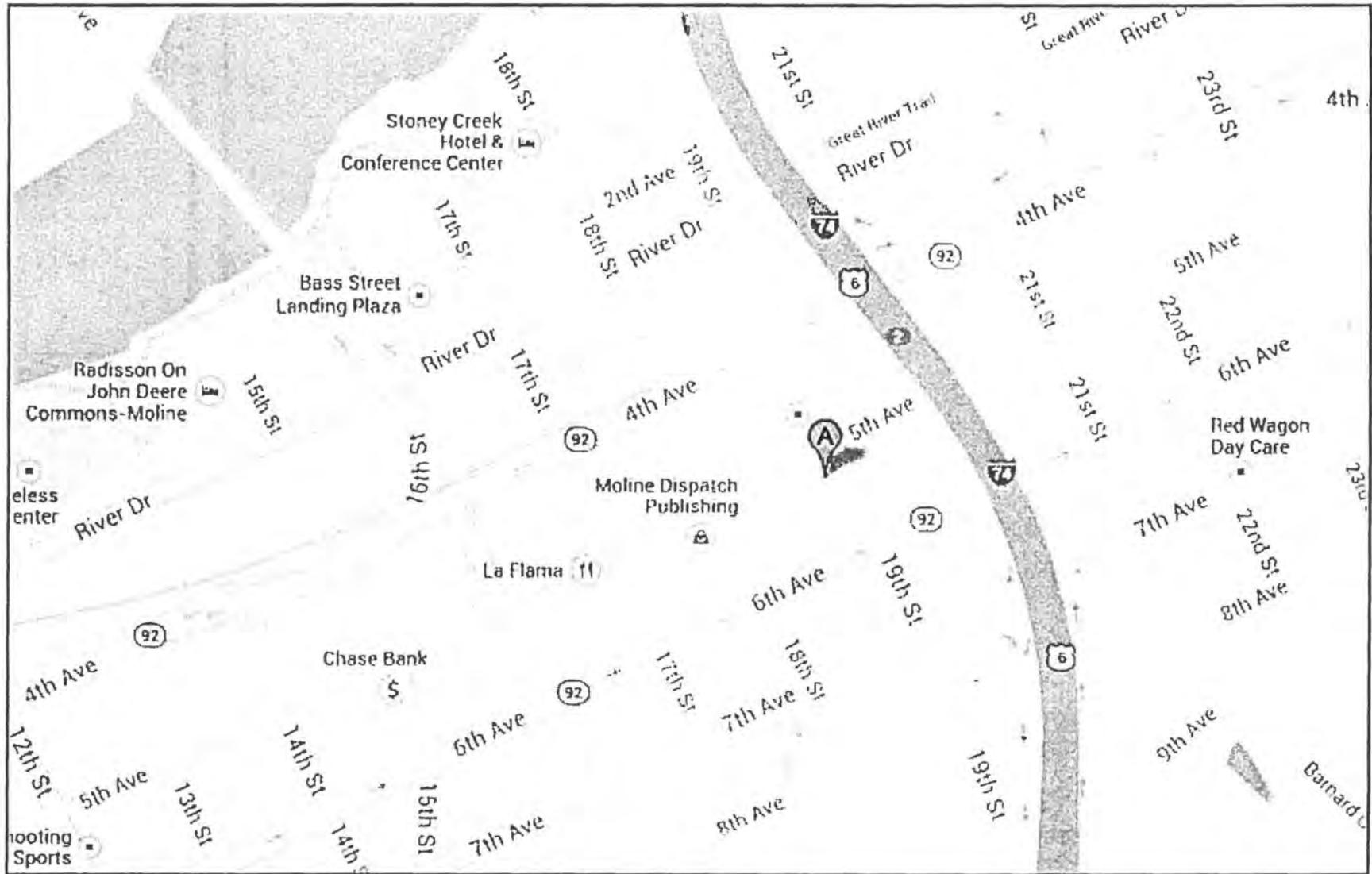
STAGE 2 SITE INVESTIGATION PLAN AND BUDGET

AMAN FOOD & GAS MOLINE, ILLINOIS

*CWM Company, Inc.
 Stage 2 Site Investigation Plan and Budget
 Aman Food & Gas - Moline
 LPC #1610455194 - Incident Number 2014-0247*

INDEX OF DRAWINGS

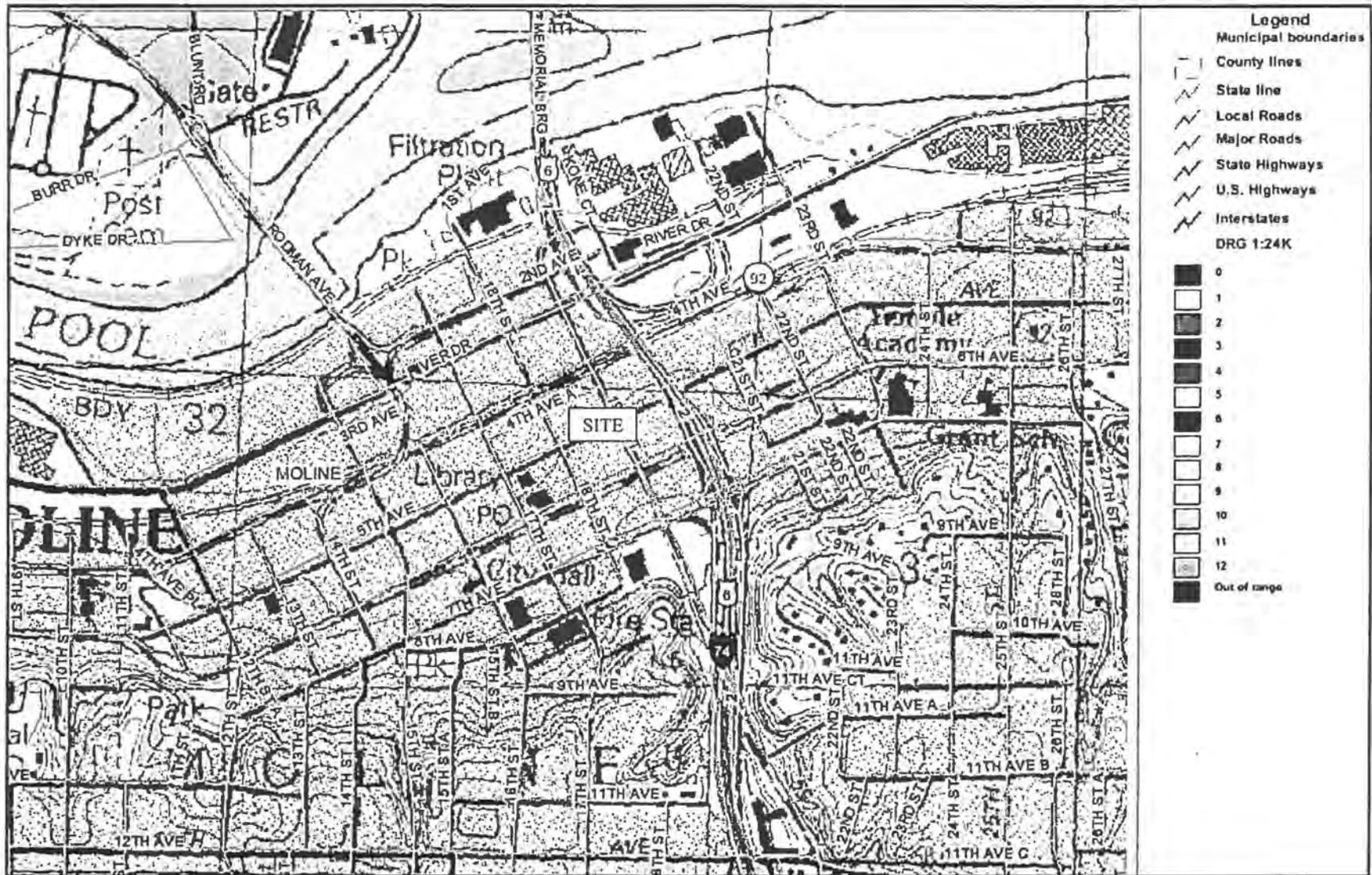
Drawing Number	Description	File Name
0001	Site Location Map	Sitemap.doc
0001A	Topographic Map	TopoMap.doc
0002	Site Map	site.dwg
0003	Early Action Excavation Location Map	eaexc.dwg
0004	Early Action Sample Location Map	ealoc.dwg
0004A	Early Action Sample Value Map	eaval.dwg
0005	Soil Boring Location Map	sbloc.dwg
0005B	Proposed Soil Boring Location Map	psbloc.dwg
0006	Monitoring Well Location Map	mwloc.dwg
0006A	Proposed Monitoring Well Location Map	pmwloc.dwg
0007	Monitoring Well Elevation Map	mwelev.dwg
0008	Groundwater Elevation Map (December 2014)	gwelev.dwg
0008A	Groundwater Flow Map (December 2014)	gwflow1214.dwg
0009A	Soil Contamination Values Map (0-5 feet)	sval0-5.dwg
0009B	Soil Contamination Values Map (5-10 feet)	sval5-10.dwg
0010	Groundwater Contamination Values Map	gwval.dwg



CW³M Company, Inc.
701 South Grand Avenue West
Springfield, IL 62704
(217)-522-8001

Site Location Map
1830 5th Avenue
Moline, Illinois

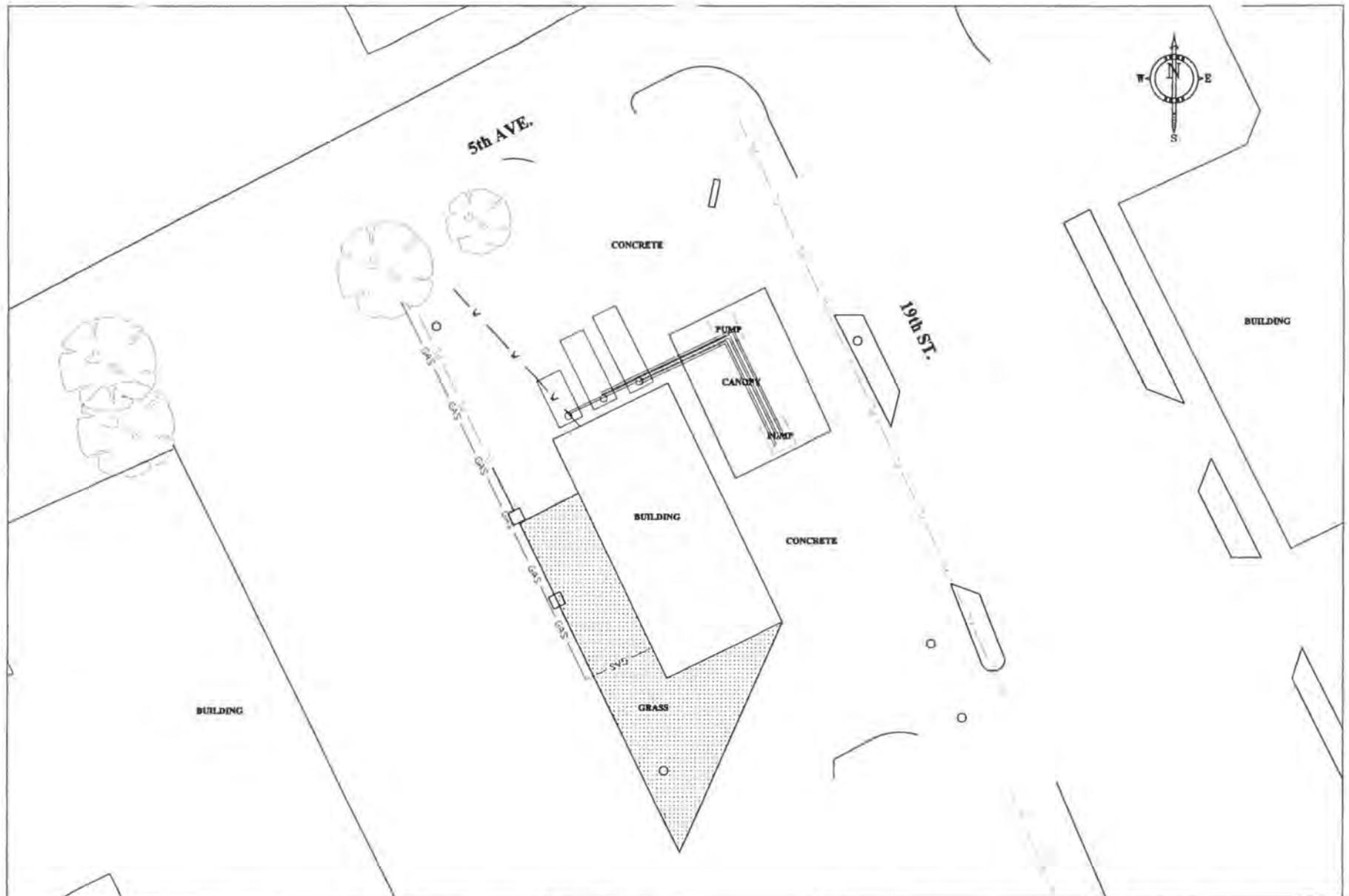
Drawn By: BMW
Reviewed By: CLR
Drawing 0001
SiteMap.doc



CW³M Company, Inc.
701 South Grand Avenue West
Springfield, IL 62704
(217)-522-8001

Topographic Map
1830 5th Avenue
Moline, Illinois

Drawn By: BMW
Reviewed By: CLR
Drawing 0001A
TopoMap.doc



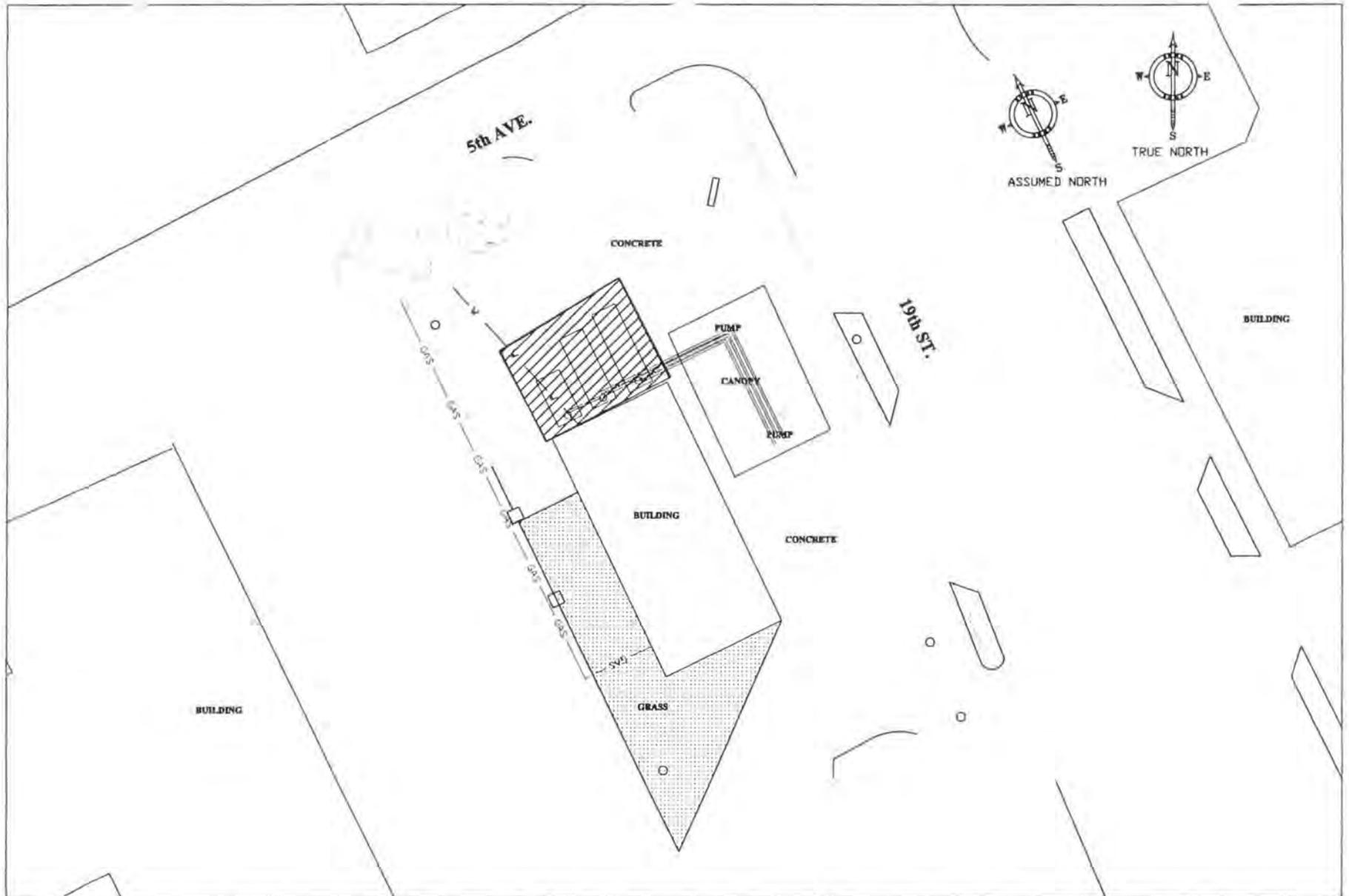
CWM COMPANY, INC.
701 W. SOUTH GRAND
SPRINGFIELD, IL. 62704
(217) 522-8001

AMAN FOOD & GAS
MOLINE, ILLINOIS
INCIDENT #2014-0247
ROCK ISLAND COUNTY

SITE MAP

DATE: 9/5/13
REVISED DATE: 5/1/14
SCALE 1"=30'
DRAWING: 0002

DRAWN BY: MDR
REVISED BY: BMW
REVIEWED BY: CLR
SITE.DWG



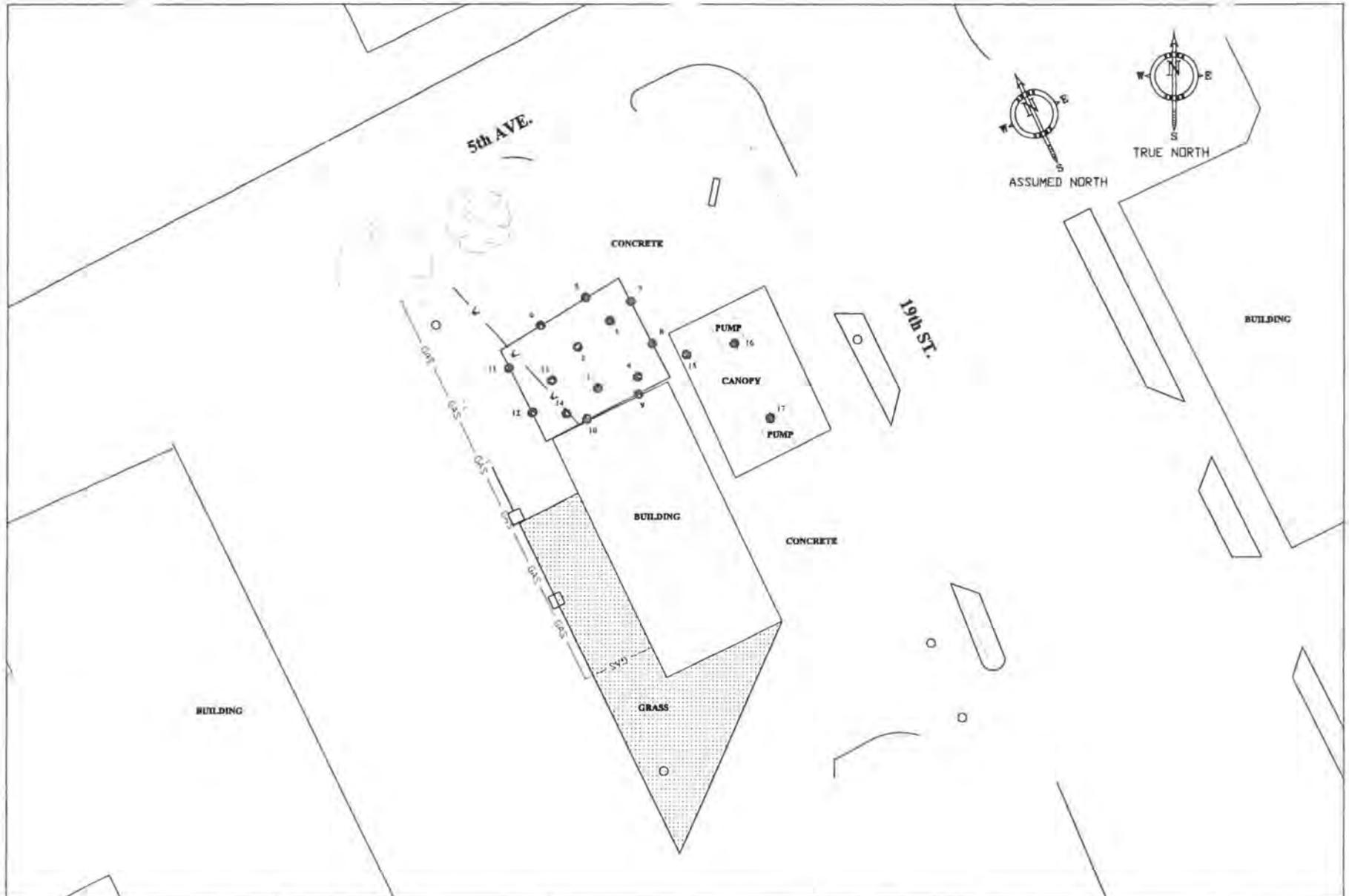
CW²M COMPANY, INC.
701 W. SOUTH GRAND
SPRINGFIELD, IL. 62704
(217) 522-8001

AMAN FOOD & GAS
MOLINE, ILLINOIS
INCIDENT #2014-0247
ROCK ISLAND COUNTY

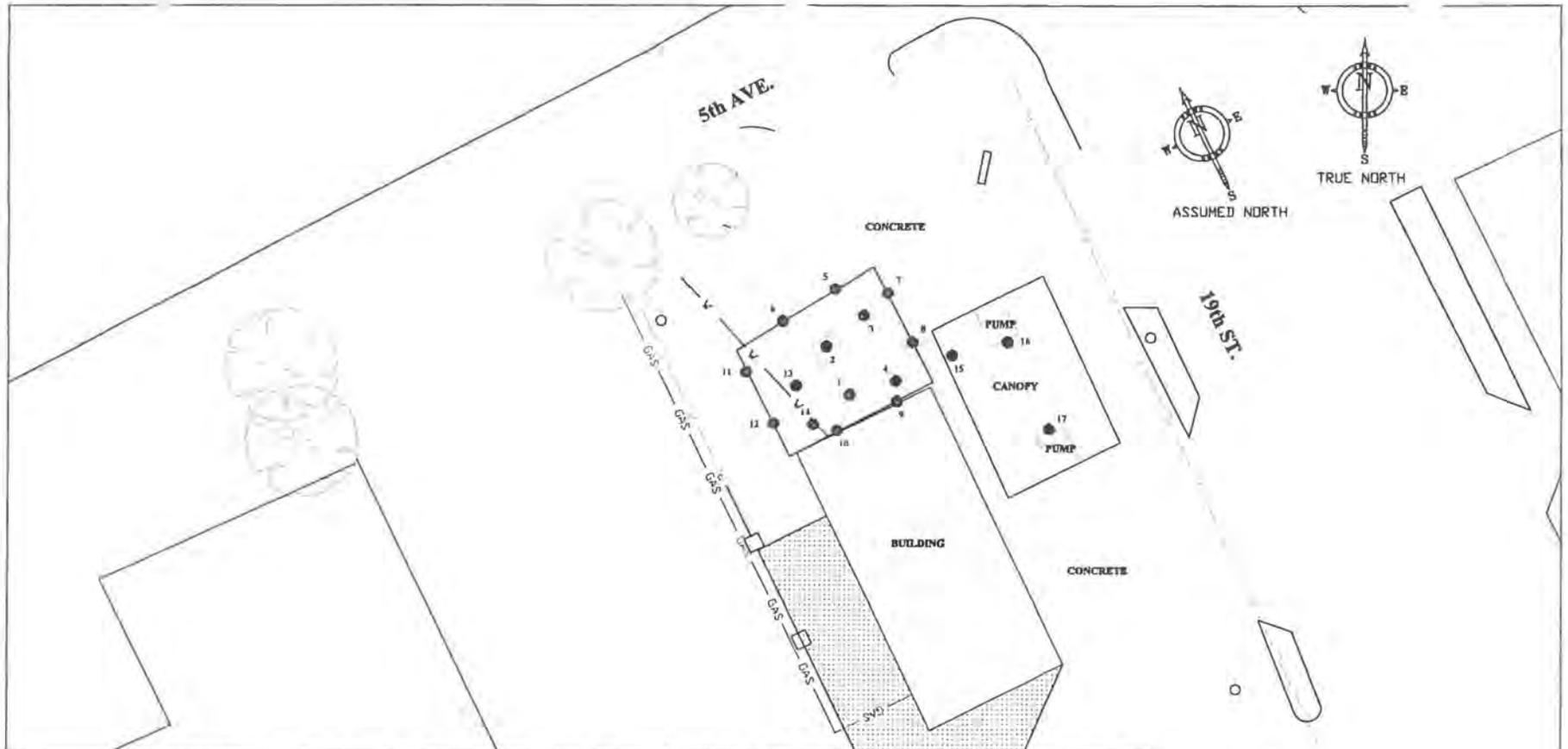
EARLY ACTION
EXCAVATION MAP

DATE: 9/5/13
REVISED DATE: 6/3/2014
SCALE 1"=30'
DRAWING: 0003

DRAWN BY: MDR
REVISED BY: VES
REVIEWED BY: CLR
EAEXC.DWG

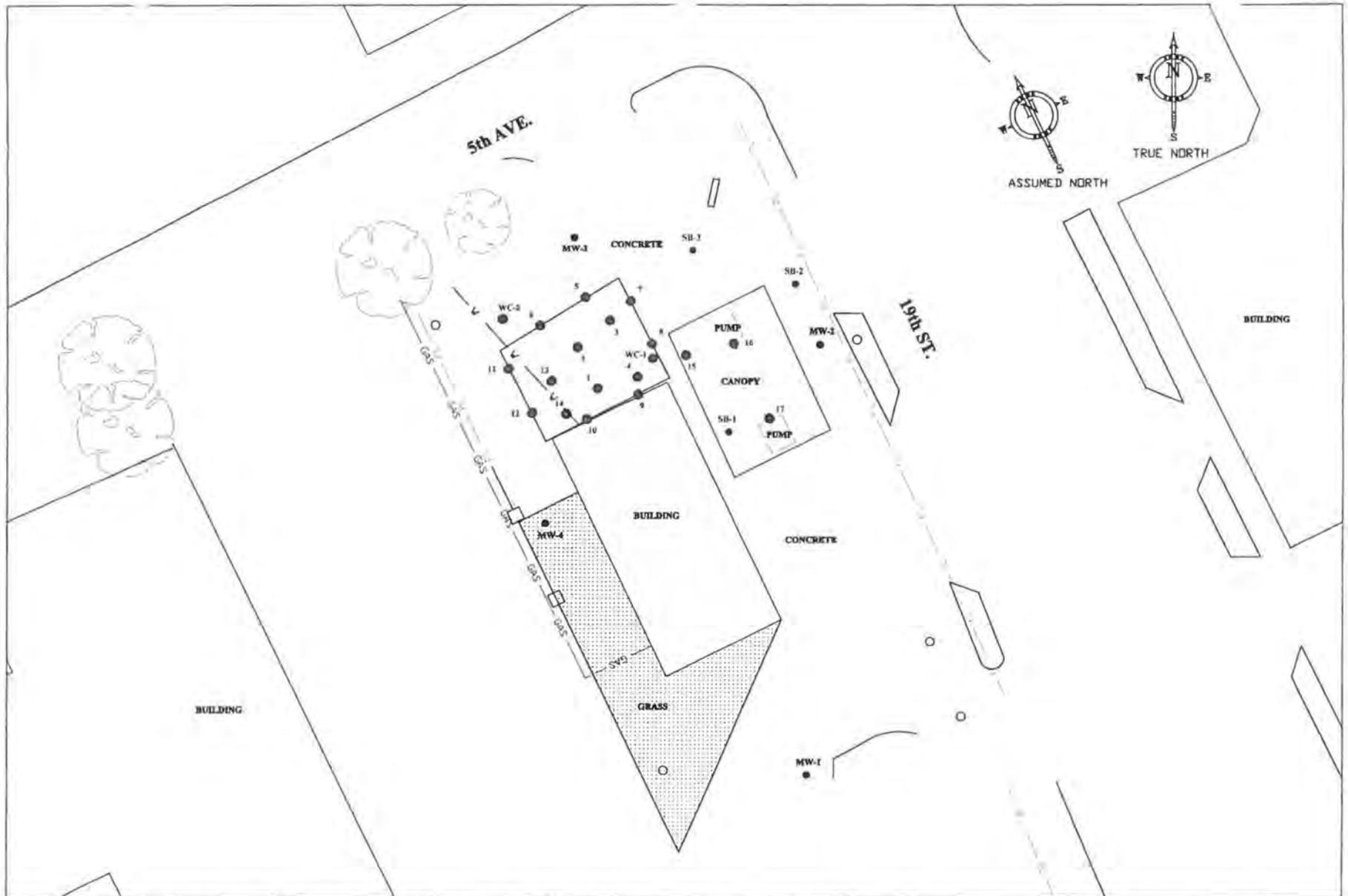


<p>CWM COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001</p>	<p>AMAN FOOD & GAS MOLINE, ILLINOIS INCIDENT #2014-0247 ROCK ISLAND COUNTY</p>	<p>EARLY ACTION SAMPLE LOCATION MAP</p>	<p>DATE: 9/5/13 REVISED DATE: 6/3/2014 SCALE 1"=30' DRAWING: 0004</p>	<p>DRAWN BY: MDR REVISED BY: VES REVIEWED BY: CLR EALOC.DWG</p>
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Location	1	2	3	4	5	6	7	8	9	10	
Date	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	
Depth											
Parameter	Class I CUO										
Benzene	0.03	0.561	1.4	2.2	1.63	0.14	0.463	0.151	20.3	0.28	0.0467
Ethybenzene	13.0	6.36	28.2	6.42	20.4	0.237	ND	1.3	34.7	4.73	ND
Toluene	12.0	0.338	0.207	0.102	1.96	ND	ND	1.96	133.	10.3	0.0825
Total Xylenes	5.6	19.1	115.	8.27	93.5	0.879	0.184	7.48	170.	26.1	0.227
MTBE	0.32	ND	ND								
	11	12	13	14	15	16	17				
	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014				
	ND	ND	1.22	0.41	0.346	0.0637	ND				
	ND	ND	10.3	9.91	8.08	0.169	ND				
	ND	ND	0.156	ND	3.05	0.417	ND				
	ND	ND	24.2	1.7	41.4	0.924	ND				
	ND	ND	ND	ND	ND	ND	ND				

<p>CWM COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001</p>	<p>AMAN FOOD & GAS MOLINE, ILLINOIS INCIDENT #2014-0247 ROCK ISLAND COUNTY</p>	<p>EARLY ACTION SAMPLE VALUES MAP</p>	<p>DATE: 1/9/2015 REVISED DATE: SCALE 1"=30' DRAWING: 0004A</p>	<p>DRAWN BY: MJS REVISED BY: REVIEWED BY: CLR EAVAL.DWG</p>
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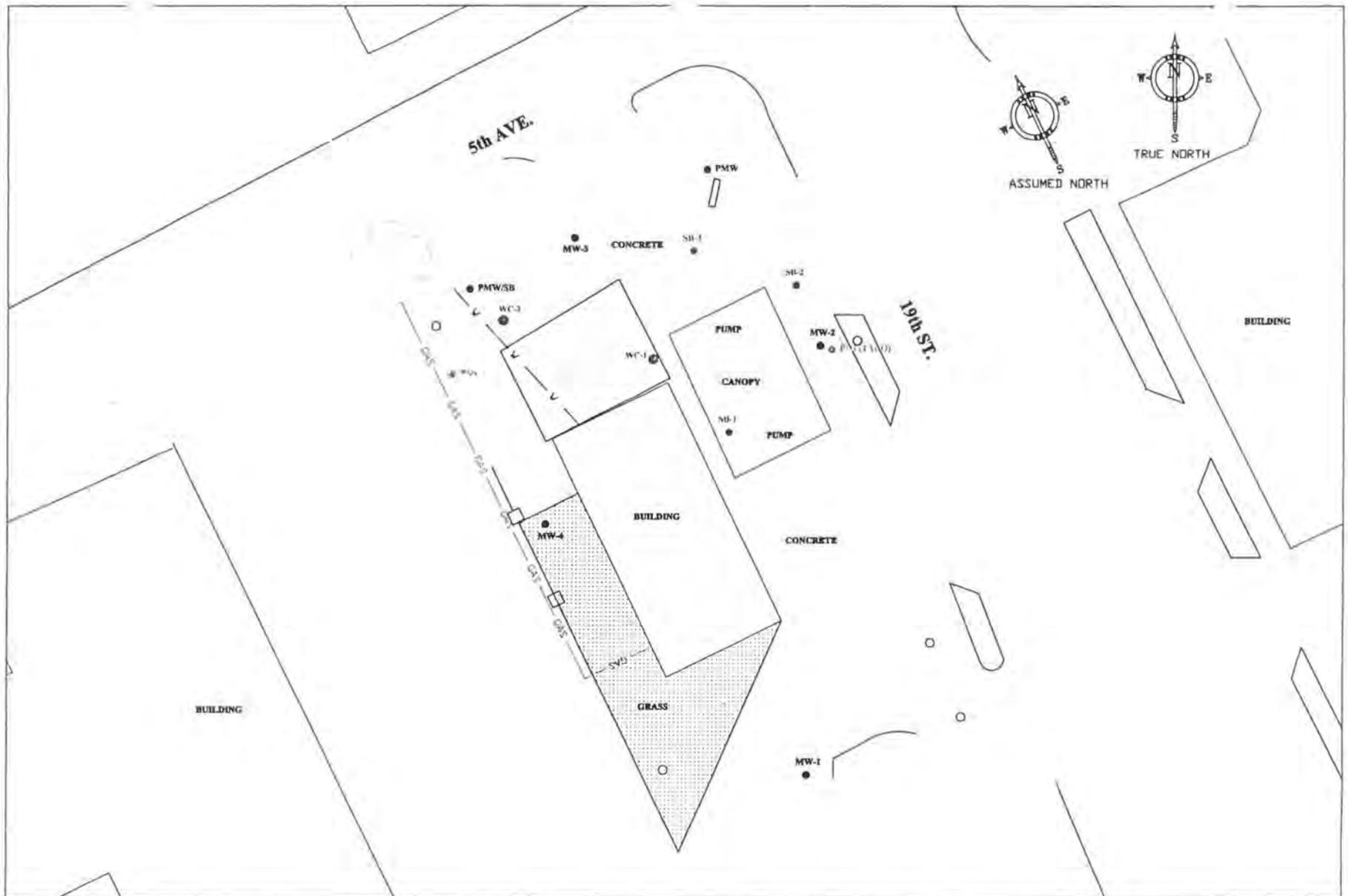
CWM COMPANY, INC.
701 W. SOUTH GRAND
SPRINGFIELD, IL. 62704
(217) 522-8001

AMAN FOOD & GAS
MOLINE, ILLINOIS
INCIDENT #2014-0247
ROCK ISLAND COUNTY

**SOIL BORING
LOCATION MAP**

DATE: 1/9/2014
REVISED DATE:
SCALE 1"=30'
DRAWING: 0005

DRAWN BY: MJS
REVISED BY:
REVIEWED BY: CLR
SBLOC.DWG



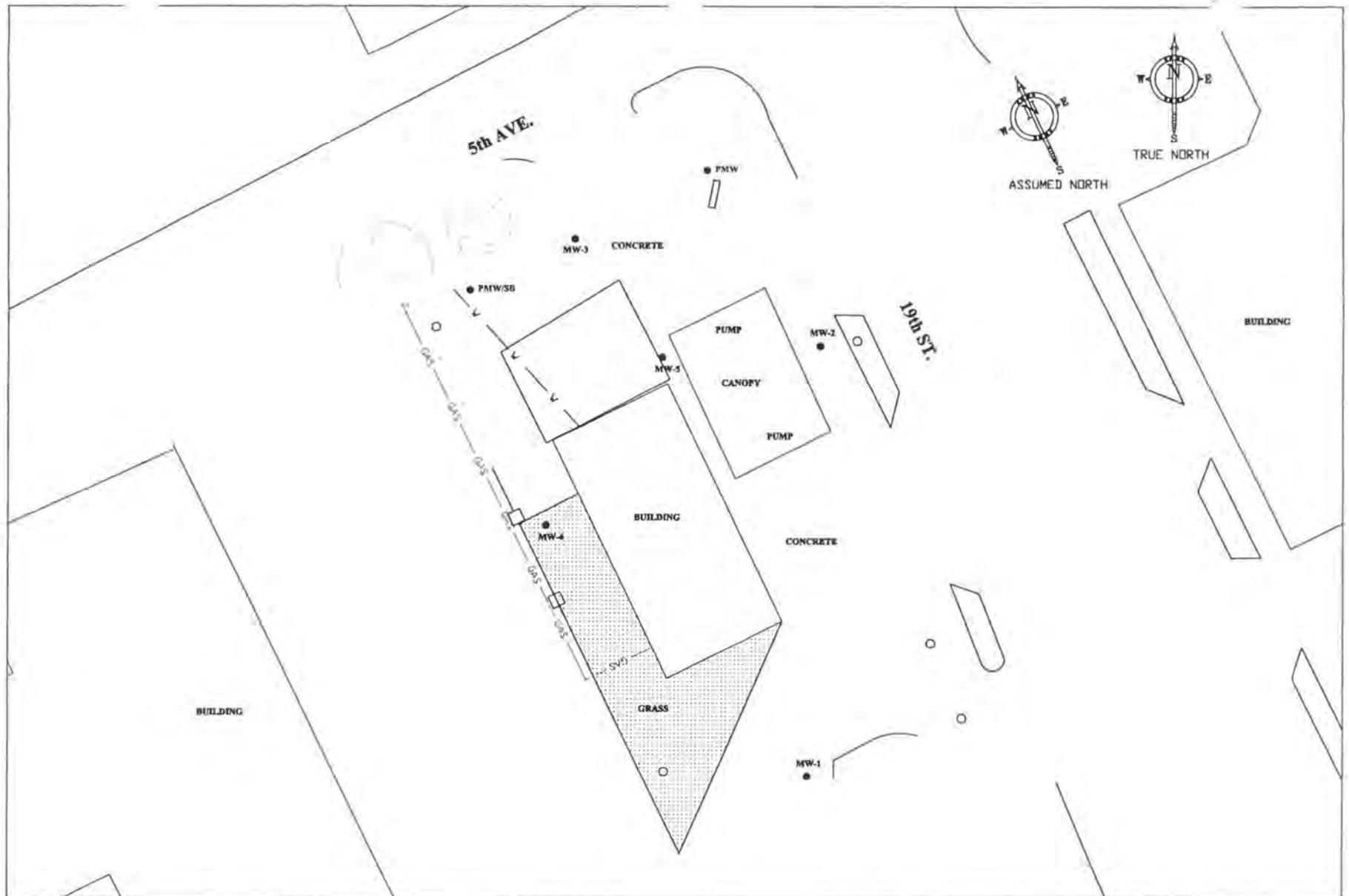
CWM COMPANY, INC.
701 W. SOUTH GRAND
SPRINGFIELD, IL. 62704
(217) 522-8001

AMAN FOOD & GAS
MOLINE, ILLINOIS
INCIDENT #2014-0247
ROCK ISLAND COUNTY

**PROPOSED
SOIL BORING
LOCATION MAP**

DATE: 1/9/2014
REVISED DATE:
SCALE 1"=30'
DRAWING: 0005B

DRAWN BY: MJS
REVISED BY:
REVIEWED BY: CLR
PSBLOC.DWG



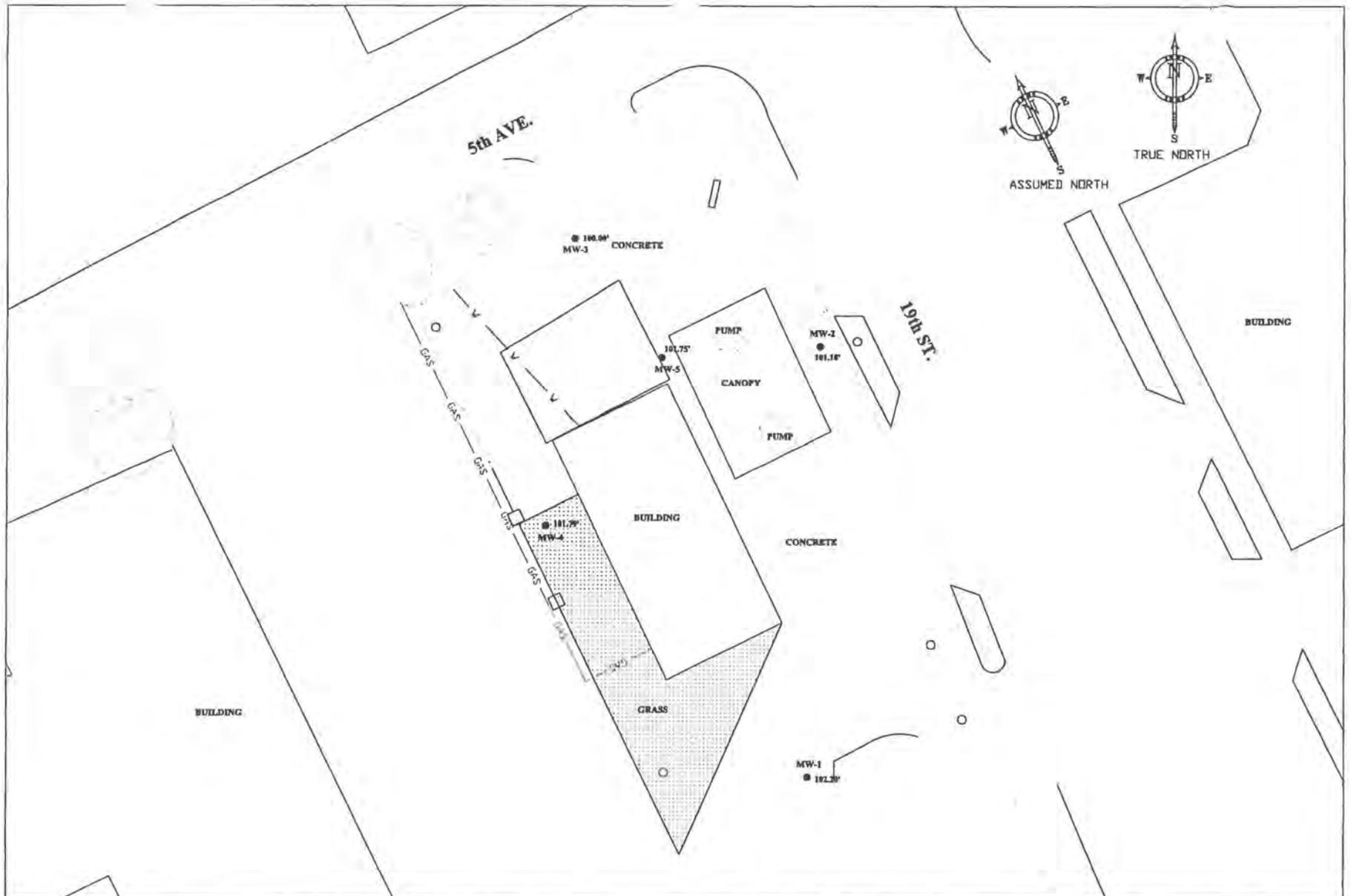
CWSM COMPANY, INC.
701 W. SOUTH GRAND
SPRINGFIELD, IL. 62704
(217) 522-8001

AMAN FOOD & GAS
MOLINE, ILLINOIS
INCIDENT #2014-0247
ROCK ISLAND COUNTY

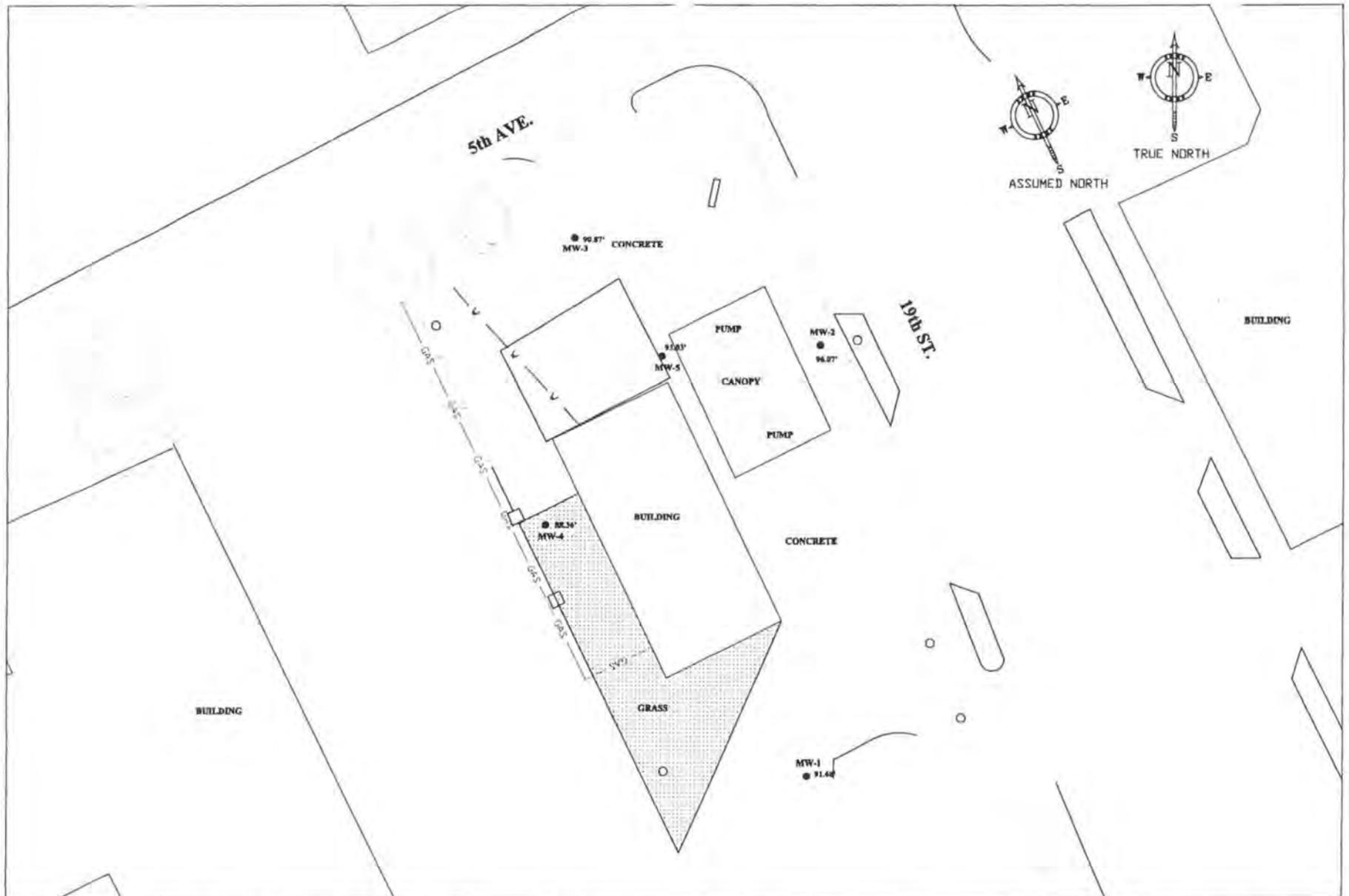
**PROPOSED
MONITORING WELL
LOCATION MAP**

DATE: 1/9/2014
REVISED DATE:
SCALE 1"=30'
DRAWING: 0006A

DRAWN BY: MJS
REVISED BY:
REVIEWED BY: CLR
PMWLOC.DWG



<p>CWM COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001</p>	<p>AMAN FOOD & GAS MOLINE, ILLINOIS INCIDENT #2014-0247 ROCK ISLAND COUNTY</p>	<p>MONITORING WELL ELEVATION MAP</p>	<p>DATE: 1/9/2014 REVISED DATE: SCALE 1"=30' DRAWING: 0007</p>	<p>DRAWN BY: MJS REVISED BY: REVIEWED BY: CLR MWELEV.DWG</p>
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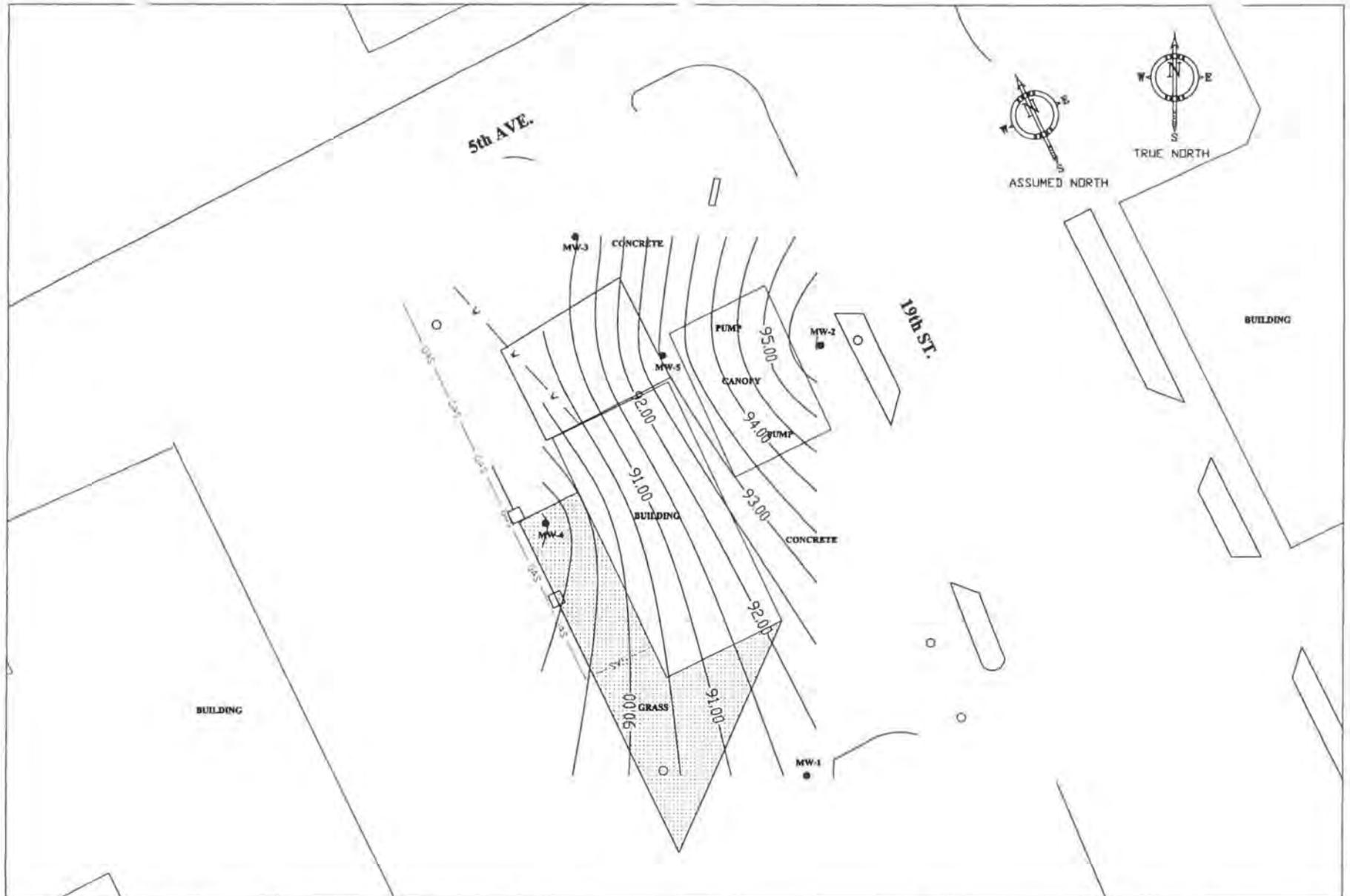
CWM COMPANY, INC.
 701 W. SOUTH GRAND
 SPRINGFIELD, IL. 62704
 (217) 522-8001

AMAN FOOD & GAS
 MOLINE, ILLINOIS
 INCIDENT #2014-0247
 ROCK ISLAND COUNTY

GROUNDWATER
 ELEVATION MAP
 (DECEMBER 2014)

DATE: 1/9/2014
 REVISED DATE:
 SCALE 1"=30'
 DRAWING: 0008

DRAWN BY: MJS
 REVISED BY:
 REVIEWED BY: CLR
 GWELEV.DWG



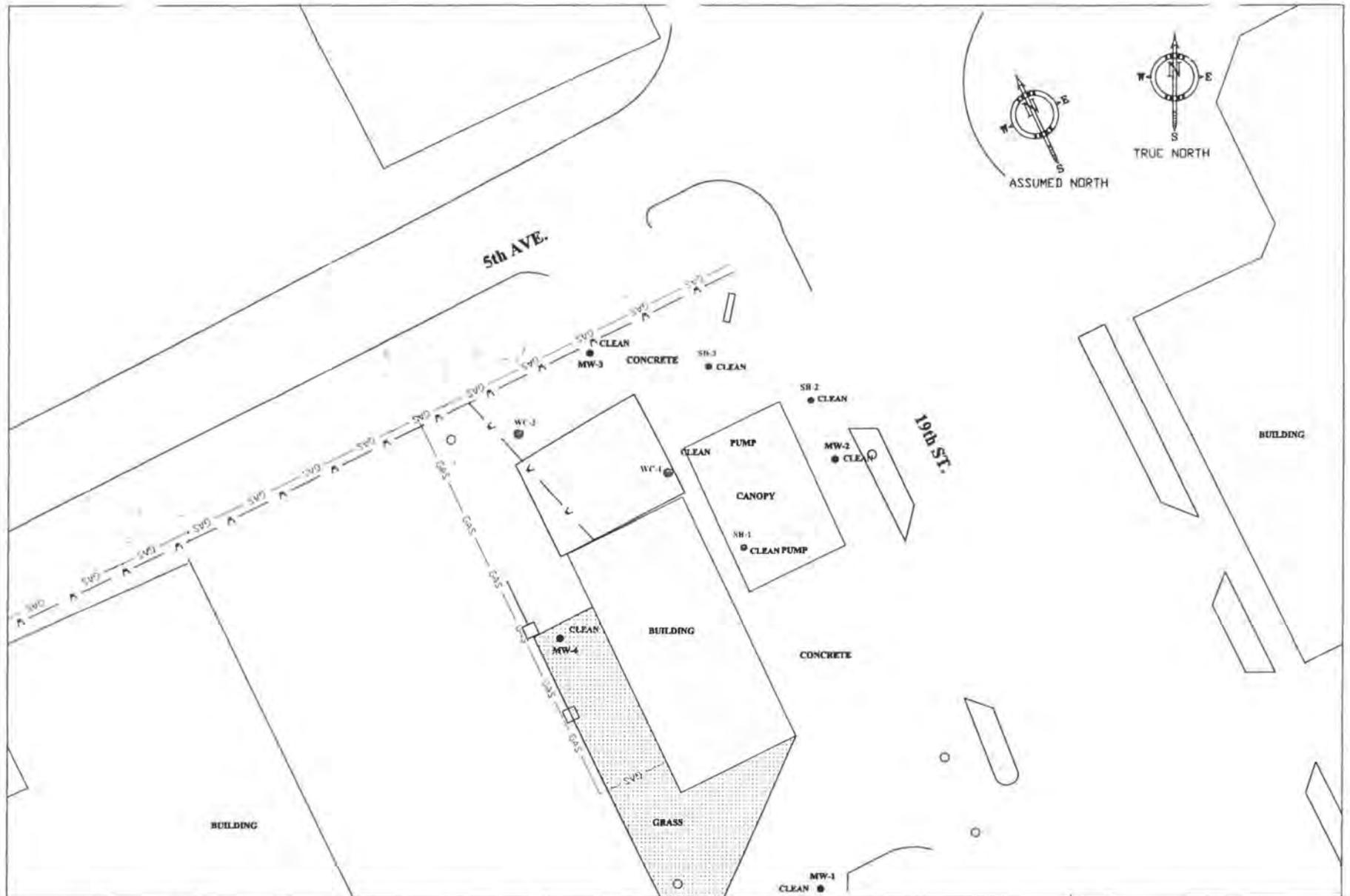
CW[®]M COMPANY, INC.
701 W. SOUTH GRAND
SPRINGFIELD, IL. 62704
(217) 522-8001

AMAN FOOD & GAS
MOLINE, ILLINOIS
INCIDENT #2014-0247
ROCK ISLAND COUNTY

**GROUNDWATER
FLOW MAP
(DECEMBER 2014)**

DATE: 1/9/2014
REVISED DATE:
SCALE 1"=30'
DRAWING: 0008A

DRAWN BY: MJS
REVISED BY:
REVIEWED BY: CLR
GWFLOW1214.DWG



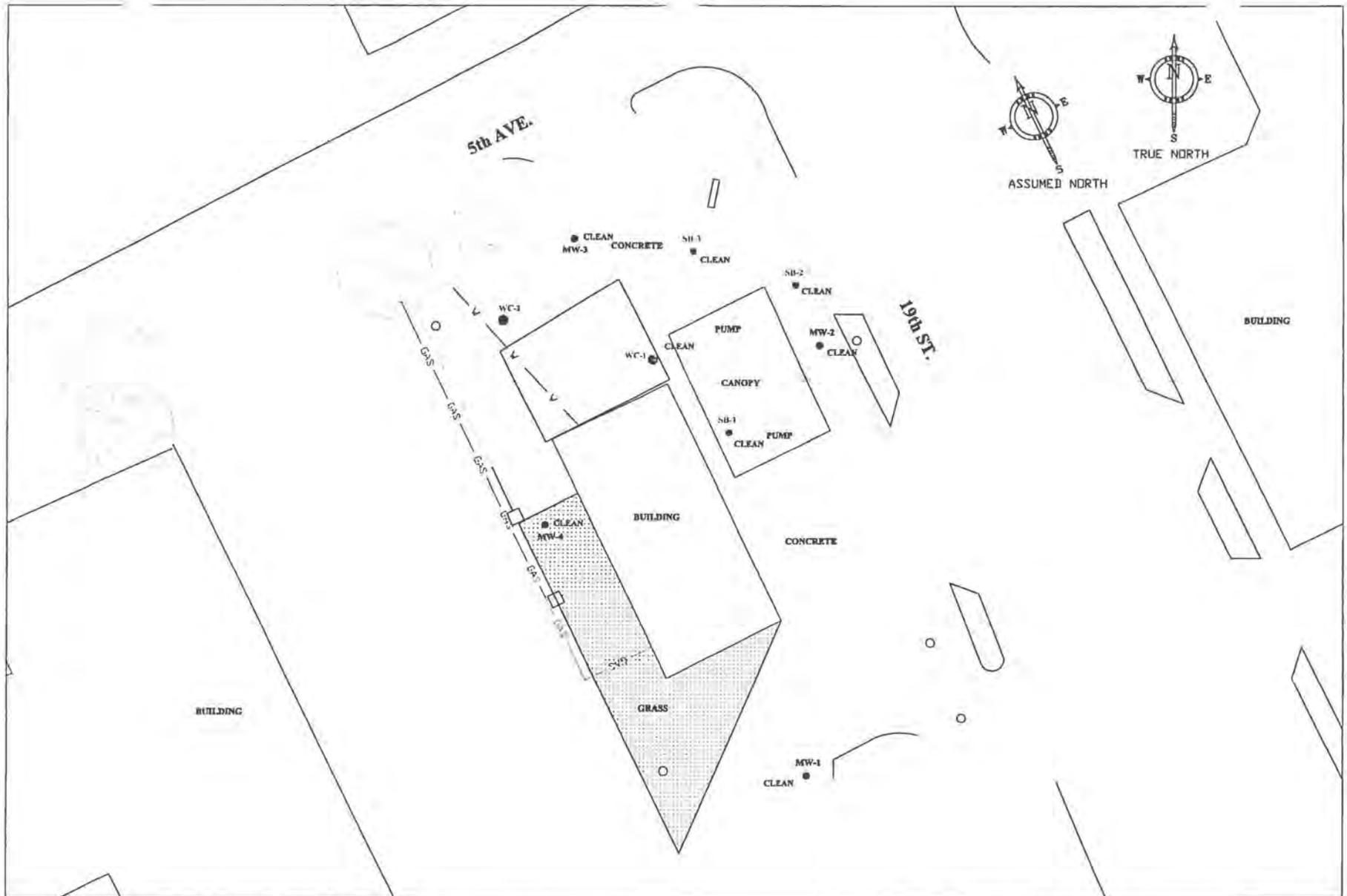
CW²M COMPANY, INC.
701 W. SOUTH GRAND
SPRINGFIELD, IL. 62704
(217) 522-8001

AMAN FOOD & GAS
MOLINE, ILLINOIS
INCIDENT #2014-0247
ROCK ISLAND COUNTY

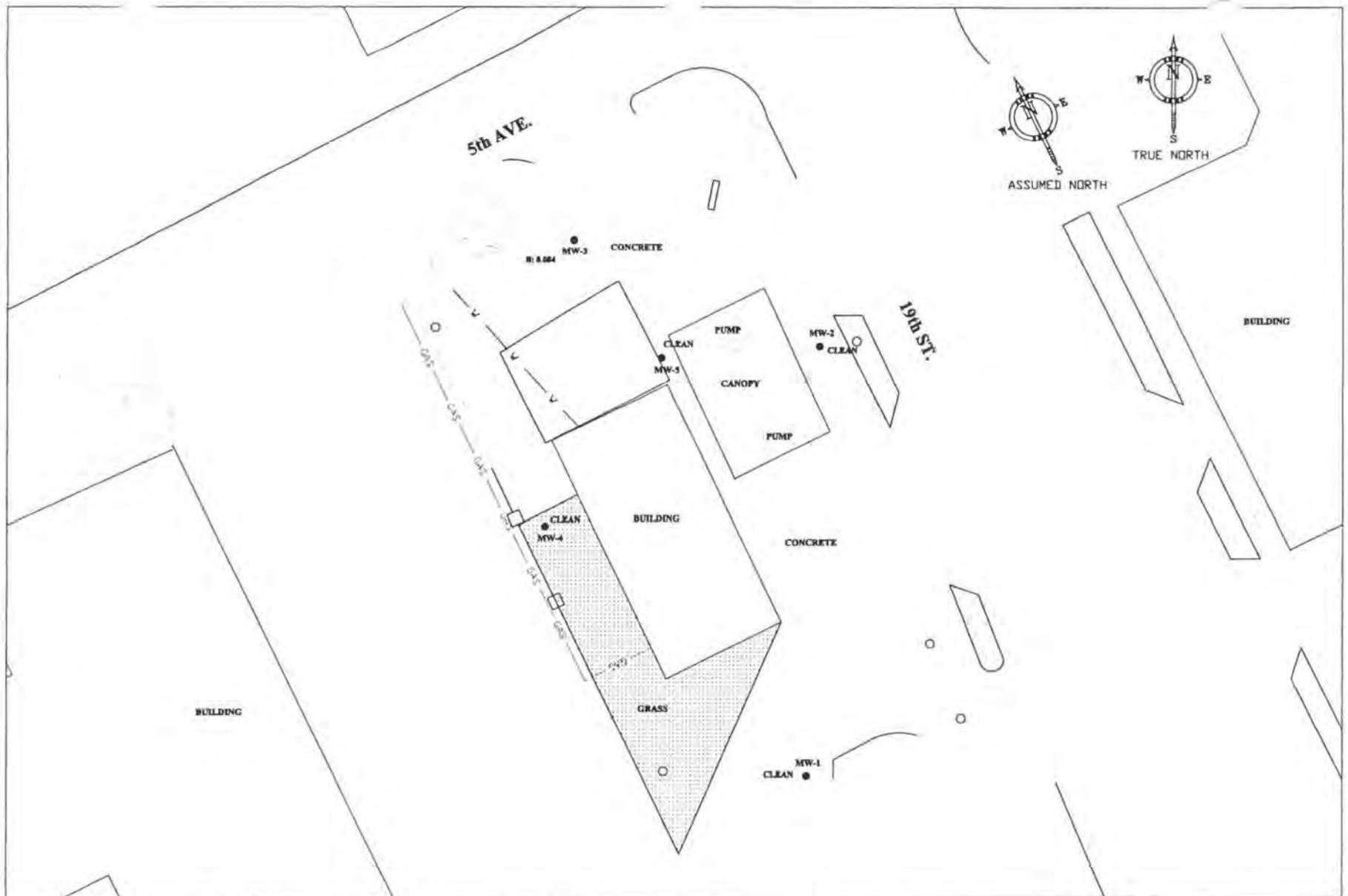
SOIL CONTAMINATION
VALUES MAP (0-5 FEET)

DATE: 1/9/2014
REVISED DATE:
SCALE 1"=30'
DRAWING: 0009A

DRAWN BY: MJS
REVISED BY:
REVIEWED BY: CLR
SVAL0-5.DWG



<p>CW[®]M COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001</p>	<p>AMAN FOOD & GAS MOLINE, ILLINOIS INCIDENT #2014-0247 ROCK ISLAND COUNTY</p>	<p>SOIL CONTAMINATION VALUES MAP (5-10 FEET)</p>	<p>DATE: 1/9/2014 REVISED DATE: SCALE 1"=30' DRAWING: 0009B</p>	<p>DRAWN BY: MJS REVISED BY: REVIEWED BY: CLR SVAL5-10.DWG</p>
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<p>CWM COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001</p>	<p>AMAN FOOD & GAS MOLINE, ILLINOIS INCIDENT #2014-0247 ROCK ISLAND COUNTY</p>	<p>GROUNDWATER CONTAMINATION VALUES MAP</p>	<p>DATE: 1/9/2014 REVISED DATE: SCALE 1"=30' DRAWING: 0010</p>	<p>DRAWN BY: MJS REVISED BY: REVIEWED BY: CLR GWVAL.DWG</p>
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APPENDIX C

SITE INVESTIGATION BUDGETS AND CERTIFICATION

STAGE 2 SITE INVESTIGATION PLAN AND BUDGET

**AMAN FOOD & GAS
MOLINE, 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 2014-0247. 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.

Owner/Operator: Aman Food & Gas

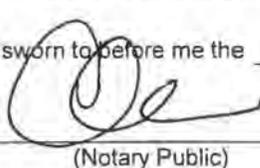
Authorized Representative: Balbir Kaur

Title: Owner

Signature: BALBIR KAUR

Date: 7/11/15

Subscribed and sworn to before me the 11th day of July, 2015


(Notary Public)



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JUL 23 2015
IEPA/BOL

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

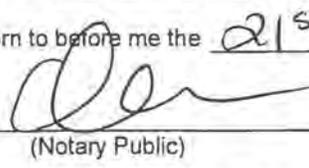
L.P.E./L.P.G. Seal:

L.P.E./L.P.G. Signature: Vince E. Smith

Date: 7/21/15



Subscribed and sworn to before me the 21st day of July, 2015


(Notary Public)



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.

General Information for the Budget and Billing Forms

LPC #: 1610455194 County: Rock Island

City: Moline Site Name: Aman Food & Gas

Site Address: 1830 5th Avenue

IEMA Incident No.: 2014-0247

IEMA Notification Date.: Mar 3, 2014

Date this form was prepared: Jan 12, 2015

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

- 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): _____

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JUL 23 2015

IEPA/BOL

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

35 III. Adm. Code 734:

- Early Action
- Free Product Removal after Early Action
- Site Investigation Stage 1: Stage 2: Stage 3:
- Corrective Action

35 III. Adm. Code 732:

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

35 III. 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: Balbir Kaur

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.)

BALBIR KAUR

W-9 must be submitted.
[Click here to print off a W-9 Form.](#)

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

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: 5 (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: 2003-0936 2014-0247

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	5,000	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	2014-0247	Overfill
Gasoline	3,000	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	2014-0247	Overfill
Gasoline	4,000	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	2014-0247	Overfill
Gasoline	4,000	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
Gasoline	6,000	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
		Yes <input type="checkbox"/> No <input type="checkbox"/>		
		Yes <input type="checkbox"/> No <input type="checkbox"/>		
		Yes <input type="checkbox"/> No <input type="checkbox"/>		
		Yes <input type="checkbox"/> No <input type="checkbox"/>		

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	Proposed		
Drilling and Monitoring Well Costs Form	\$	\$ 4,255.35	\$ 2,423.77	\$	\$
Analytical Costs Form	\$	\$ 2,229.27	\$ 1,143.55	\$	\$
Remediation and Disposal Costs Form	\$	\$ 607.46	\$	\$	\$
UST Removal and Abandonment Costs Form	\$	\$	\$	\$	\$
Paving, Demolition, and Well Abandonment Costs Form	\$	\$	\$	\$	\$
Consulting Personnel Costs Form	\$	\$ 16,224.32	\$ 26,588.02	\$	\$
Consultant's Materials Costs Form	\$	\$ 953.00	\$ 1,042.50	\$	\$
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	\$	\$ 24,269.40	\$ 31,197.84	\$	\$

**STAGE 1
BUDGET SUMMARY**

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
4	HSA	15.00	60.00	GW Plume Delineation - Stage I
1	HSA	15.00	15.00	Soil/GW Plume Delineation - Stage I
3	PUSH	10.00	30.00	Soil Plume Delineation - Stage I

	Total Feet	Rate per Foot (\$)	Total Cost
Total Feet via HSA:	75.00	✓ 27.94	\$2,095.50
Total Feet via PUSH:	30.00	✓ 21.87	\$656.10
Total Feet for Injection via PUSH:		18.23	
Total Drilling Costs:			\$2,751.60

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
5	HSA	2.00	15.00	75.00

Well Installation	Total Feet	Rate per Foot (\$)	Total Cost
Total Feet via HSA:	75.00	✓ 20.05	\$1,503.75
Total Feet via PUSH:		15.18	
Total Feet of 4" or 6" Recovery:		30.38	
Total Feet of 8" or Greater Recovery:		49.81	
Total Well Costs:			\$1,503.75

Total Drilling and Monitoring Well Costs:	\$4,255.35
--	-------------------

Analytical Costs Form

Laboratory Analysis	Number of Samples		Cost (\$) per Analysis		Total per Parameter
Chemical Analysis					
BETX Soil with MTBE EPA 8260	14	X	✓ 103.26	=	\$1,445.64
BETX Water with MTBE EPA 8260	5	X	✓ 98.41	=	\$492.05
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 (ρ _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 (ρ _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	14	X	√ 12.15	=	\$170.10
Sample Shipping per sampling event ¹	2	X	√ 60.74	=	\$121.48

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

Total Analytical Costs: \$ 2,229.27

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 (\$)
2	303.73	607.46
Number of Drums of Liquid Waste	Cost per Drum (\$)	Total Cost (\$)
Total Drum Disposal Costs		607.46

Total Remediation and Disposal Costs:	\$607.46
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Consulting Personnel Costs Form

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Senior Project Manager	8.00	✓ 121.49	\$971.92
Stage 1-Field	Office Prep. and Drill Plans / Technical Oversight / Coordination			
	Engineer III	5.00	✓ 121.49	\$607.45
Stage 1-Field	SI Arrangements / Preparations / Field Plans			
	Technician IV	18.00	✓ 72.88	\$1,311.84
Stage 1-Field	Groundwater Sampling & Surveying			
	Engineer III	6.00	✓ 121.49	\$728.94
Stage 1-Field	Analytical Logging & Review			
	Senior Draftperson/CAD	4.00	✓ 72.88	\$291.52
Stage 1-Field	Drafting/Locations/Elevations/Contamination Levels			
	Engineer I	18.00	✓ 91.11	\$1,639.98
Stage 1-Field	On-site Drilling & Sampling / GW Sampling & Surveying			
	Engineer III	14.00	✓ 121.49	\$1,700.86
Stage 1-Field	On-site Drilling & Soil Sampling			
	Senior Admin, Assistant	3.00	✓ 54.67	\$164.01
Stage 1-Field	Scheduling / Arrangements			
	Engineer I	7.00	✓ 91.11	\$637.77
Stage 1-Field	Boring Logs & WCR's / Analytical Tabulation			

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Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Senior Project Manager	6.00	✓ 121.49	\$728.94
Stage 1-Field	Analytical Review & Evaluation / BL & WCR Review / SI Documentation			
	Senior Project Manager	8.00	✓ 121.49	\$971.92
Stage 1-Pay	Stage 1 Budget Review / Coordination			
	Senior Prof. Engineer	3.00	✓ 157.94	\$473.82
Stage 1-Pay	Stage 1 Budget Summary Review & Certification			
	Engineer III	18.00	✓ 121.49	\$2,186.82
Stage 1-Pay	Stage 1 Budget Summary Preparation			
	Senior Admin. Assistant	4.00	✓ 54.67	\$218.68
Stage 1-Pay	Stage 1 Budget Summary Reimbursement Preparation			
	Senior Project Manager	12.00	✓ 121.49	\$1,457.88
Stage 1-Pay	Stage 1 Reimbursement Coordination / Technical Oversight / Compliance / Review			
	Senior Prof. Engineer	4.00	✓ 157.94	\$631.76
Stage 1-Pay	Stage 1 Reimbursement Certification			
	Senior Acct. Technician	20.00	✓ 66.81	\$1,336.20
Stage 1-Pay	Stage 1 Reimbursement Preparation & Inputs			
	Senior Admin. Assistant	3.00	✓ 54.67	\$164.01
Stage 1-Pay	Stage 1 Reimbursement Preparation & Distribution			

*Refer to the applicable Maximum Payment Amounts document.

Total of Consulting Personnel Costs	\$16,224.32
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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 1-Field	To detect VOC levels in soil samples				
Survey Equipment Rental		1.00	75.00	/day	\$75.00
Stage 1-Field	Survey monitoring well elevations for groundwater flow calculations				
Water Level Indicator		2.00	24.00	/day	\$48.00
Stage 1-Field	Test for groundwater during drilling activities/Measure static groundwater elevations				
Measuring Wheel		1.00	18.00	/day	\$18.00
Stage 1-Field	Mapping sampling locations				
Mileage		670.00	.65	/mile	\$435.50
Stage 1-Field	2 round trips from Springfield office				
Disposable Gloves		2.00	13.00	/box	\$26.00
Stage 1-Field	Disposable latex gloves for soil and groundwater sampling				
Bailing Twine		1.00	5.00	/roll	\$5.00
Stage 1-Field	String for Bailers				
Bailers		5.00	13.00	/each	\$65.00
Stage 1-Field	Disposable bailer for monitoring well development and sampling				

Electronic Filing: Received, Clerk's Office 4/5/2017

Materials, Equipment, or Field Purchase		Time or Amount Used	Rate (\$)	Unit	Total Cost
Remediation Category	Description/Justification				
Copies		50.00	.15	/copy	\$7.50
Stage 1-Field	Copies of maps and boring logs for field use				
Copies		150.00	.15	/copy	\$22.50
Stage 1-Field	IEPA correspondence, analytical reports, field reports				
Postage		2.00	6.00	/each	\$12.00
Stage 1-Pay	Mailing Stage 1 Budget forms / completed				
Copies		200.00	.15	/copy	\$30.00
Stage 1-Pay	Copies of Stage 1 Budget Summary / Draft				
Copies		450.00	.15	/copy	\$67.50
Stage 1-Pay	Copies of Stage 1 Reimbursement Claim / Draft / Forms				
Postage		2.00	6.00	/each	\$12.00
Stage 1-Pay	Stage 1 Reimbursement Forms				
Total of Consultant Materials Costs					\$953.00

**STAGE 2
BUDGET SUMMARY**

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	HSA	15.00	15.00	Groundwater Plume Delineation
1	HSA	15.00	15.00	Soil/GW Plume Delineation
1	PUSH	10.00	10.00	Soil Plume Delineation
1	PUSH	10.00	10.00	TACO Parameters

Subpart H minimum payment amount applies.

	Total Feet	Rate per Foot (\$)	Total Cost (\$)
Total Feet via HSA:	30.00	✓ 27.94	838.20
Total Feet via PUSH:	20.00	✓ 21.87	437.40
Total Feet for Injection via PUSH:		18.23	
Total Drilling Costs:			1,822.27

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 (\$)
2	HSA	2.00	15.00	30.00

Well Installation	Total Feet	Rate per Foot (\$)	Total Cost (\$)
Total Feet via HSA:	30.00	20.05	601.50
Total Feet via PUSH:		15.18	
Total Feet of 4" or 6" Recovery:		30.38	
Total Feet of 8" or Greater Recovery:		49.81	
Total Well Costs:			601.50

Total Drilling and Monitoring Well Costs:	\$2,423.77
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Analytical Costs Form

Laboratory Analysis	Number of Samples		Cost (\$) per Analysis		Total per Parameter
Chemical Analysis					
BETX Soil with MTBE EPA 8260	4	X	✓ 103.26	=	\$413.04
BETX Water with MTBE EPA 8260	2	X	✓ 98.41	=	\$196.82
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	1	X	✓ 46.16	=	\$46.16
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		=	
		X		=	
Geo-Technical Analysis					
Soil Bulk Density (p _b) ASTM D2937-94	1	X	✓ 26.72	=	\$26.72
Ex-situ Hydraulic Conductivity / Permeability		X		=	
Moisture Content (w) ASTM D2216-92 / D4643-93	1	X	✓ 14.58	=	\$14.58
Porosity		X		=	
Rock Hydraulic Conductivity Ex-situ		X		=	
Sieve / Particle Size Analysis ASTM D422-63 / D1140-54	1	X	✓ 176.15	=	\$176.15
Soil Classification ASTM D2488-90 / D2487-90		X		=	
Soil Particle Density (p _s) ASTM D854-92	1	X	100.00	=	\$100.00
		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	4	X	✓ 12.15	=	\$48.60
Sample Shipping per sampling event ¹	2	X	✓ 60.74	=	\$121.48

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

Total Analytical Costs: \$ 1,143.55

Consulting Personnel Costs Form

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Senior Project Manager	12.00	✓ 121.49	\$1,457.88
Stage 2-Plan	Stage 2 Plan / Oversight/ Coordination / Technical Compliance			
	Draftperson/CAD III	8.00	✓ 60.74	\$485.92
Stage 2-Plan	Drafting of Maps for Report			
	Engineer I	36.00	✓ 91.11	\$3,279.96
Stage 2-Plan	Stage 2 Plan Preparation			
	Engineer III	10.00	✓ 121.49	\$1,214.90
Stage 2-Plan	Stage 2 Sampling Plan / Plan Design			
	Senior Admin. Assistant	4.00	✓ 54.67	\$218.68
Stage 2-Plan	Stage 2 Report Compilation, Assembly and Distribution			
	Senior Prof. Engineer	3.00	✓ 157.94	\$473.82
Stage 2-Plan	Stage 2 Plan Certification			

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Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Engineer I	12.00	✓ 91.11	\$1,093.32
Stage 2-Field	MW Surveying and Sampling			
	Professional Geologist	16.00	✓ 111.76	\$1,788.16
Stage 2-Field	On-site Drilling / Oversight			
	Engineer III	16.00	✓ 121.49	\$1,943.84
Stage 2-Field	On-site Drilling / Oversight			
	Professional Geologist	12.00	✓ 111.76	\$1,341.12
Stage 2-Field	MW Surveying and Sampling			
	Senior Admin. Assistant	4.00	✓ 54.67	\$218.68
Stage 2-Field	Office Prep., Scheduling, Arrangements for Investigation			
	Senior Prof. Geologist	8.00	✓ 133.64	\$1,069.12
Stage 2-Field	Hydraulic Conductivity Determination / GW Flow Calculations / Direction			
	Senior Project Manager	8.00	✓ 121.49	\$971.92
Stage 2-Field	Analytical Review / Evaluation / BL & WCR Review / SI Documentation			
	Draftperson/CAD III	8.00	✓ 60.74	\$485.92
Stage 2-Field	Drafting Locations/Elevation and Contamination Levels/Drilling Prep.			
	Engineer I	8.00	✓ 91.11	\$728.88
Stage 2-Field	BL and WCR Data Entry / Analytical Tabulation			

Electronic Filing: Received, Clerk's Office 4/5/2017

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Engineer I	18.00	✓ 91.11	\$1,639.98
Stage 2-Budget	Budget Inputs / Calculations			
	Engineer III	6.00	✓ 121.49	\$728.94
Stage 2-Budget	Budget Development			
	Senior Project Manager	8.00	✓ 121.49	\$971.92
Stage 2-Budget	Stage 2 Budget / Oversight / Coordination / Technical Compliance			
	Senior Prof. Engineer	3.00	✓ 157.94	\$473.82
Stage 2-Budget	Stage 2 Budget Certification			
	Senior Admin. Assistant	3.00	✓ 54.67	\$164.01
Stage 2-Budget	Stage 2 Budget Compilation / Assembly / Distribution			
	Engineer I	12.00	✓ 91.11	\$1,093.32
Stage 2-Field	Log Soil/Groundwater Analytical Results/BL's/WCR's			

Electronic Filing: Received, Clerk's Office 4/5/2017

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Engineer III	4.00	✓ 121.49	\$485.96
Stage 2-Field	SI Field Preparation / Mobilization / Drilling Plan			
	Senior Prof. Engineer	4.00	✓ 157.94	\$631.76
Stage 2-Pay	Stage 2 Reimbursement Certification			
	Senior Project Manager	12.00	✓ 121.49	\$1,457.88
Stage 2-Pay	Stage 2 Reimbursement Oversight/Technical Compliance			
	Senior Acct. Technician	30.00	✓ 66.81	\$2,004.30
Stage 2-Pay	Stage 2 Reimbursement Preparation			
	Senior Admin. Assistant	3.00	✓ 54.67	\$164.01
Stage 2-Pay	Stage 2 Reimbursement Compilation, Assembly and Distribution			

*Refer to the applicable Maximum Payment Amounts document.

Total of Consulting Personnel Costs	\$26,588.02
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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 2-Field	To Detect VOC Levels in Soil Samples				
Survey Equipment Rental		1.00	75.00	/day	\$75.00
Stage 2-Field	Survey Monitor Well Elevations for Groundwater Flow Calculations				
Water Level Indicator		2.00	21.00	/day	\$42.00
Stage 2-Field	Test for Groundwater During Drilling Activities/Measure Static Groundwater Elevations				
Measuring Wheel		1.00	18.00	/day	\$18.00
Stage 2-Field	Mapping Sampling Locations				
Mileage		670.00	.65	/mile	\$435.50
Stage 2-Field	Two Round Trips from Springfield Office (1-Drilling, 1-Groundwater Sampling)				
Disposable Gloves		1.00	12.00	/box	\$12.00
Stage 2-Field	Disposable Gloves for Soil and Groundwater Sampling				
Bailers		2.00	13.00	/each	\$26.00
Stage 2-Field	Disposable Bailers for Monitoring Well Development and Sampling				
Bailing Twine		1.00	5.00	/roll	\$5.00
Stage 2-Field	String for Bailers				
Copies		100.00	.15	/each	\$15.00
Stage 2-Field	Field/Plan/Maps/Borelogs				

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Materials, Equipment, or Field Purchase		Time or Amount Used	Rate (\$)	Unit	Total Cost
Remediation Category	Description/Justification				
Copies		750.00	.15	/each	\$112.50
Stage 2-Plan	Copies of Plan / Drafts				
Postage		2.00	6.00	/each	\$12.00
Stage 2-Plan	Forms Distribution				
Copies		150.00	.15	/each	\$22.50
Stage 2-Budget	Copies of Budget / Drafts				
Postage		1.00	6.00	/each	\$6.00
Stage 2-Budget	Budget Distribution				
Copies		800.00	.15	/each	\$120.00
Stage 2-Pay	Copies of Reimbursement Claim				
Postage		2.00	6.00	/each	\$12.00
Stage 2-Pay	Distribution of Reimbursement Forms Claim				
Total of Consultant Materials Costs					\$1,042.50

APPENDIX D

ILLINOIS OFFICE OF THE STATE FIRE MARSHAL ELIGIBILITY DETERMINATION

STAGE 2 SITE INVESTIGATION PLAN AND BUDGET

**AMAN FOOD & GAS
MOLINE, ILLINOIS**



Office of the Illinois
State Fire Marshal
"Partnering With the Fire Service to Protect Illinois"

CERTIFIED MAIL - RECEIPT REQUESTED #7014 1820 0001 3148 5009

January 8, 2015

Jeet Singh
c/o CW3M Company
P.O. Box 571
Carlinville, IL 62626

In Re: Facility No. 3-008580
IEMA Incident No. 14-0247
Aman Food & Gas
1830 5th Avenue
Moline, Rock Island Co., IL

Dear Applicant:

The Reimbursement Eligibility and Deductible Application received on November 17, 2014 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 \$5,000. The costs must be in response to the occurrence referenced above and associated with the following tanks:

Eligible Tanks

Tank 1 5,000 gallon Gasoline
Tank 2 3,000 gallon Gasoline
Tank 3 4,000 gallon Gasoline

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

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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 105.504(b)).

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

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 4 4,000 gallon Gasoline
Tank 5 6,000 gallon Gasoline

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
CW3M Company

APPENDIX E

BORING LOGS AND WELL COMPLETION REPORTS

STAGE 2 SITE INVESTIGATION PLAN AND BUDGET

**AMAN FOOD & GAS
MOLINE, ILLINOIS**

	Illinois Environmental Protection Agency	CW M COMPANY, INC. DRILLING BOREHOLE LOG
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COST INCIDENT # 2013-0157	BOREHOLE NUMBER: SB-1
SITE NAME: Aman Food & Gas - Moline	BORING LOCATION: 45' N and 8' E corner of SE building
SITE ADDRESS: 1830 5th Avenue Moline, IL 61265	RIG TYPE: Truck Mounted Drill Rig
DATE/TIME STARTED: 10/1/14 1:15	DRILLING/SAMPLE METHOD: continuous sampling/hollow stem auger
DATE/TIME FINISHED: 10/1/14 1:30	BACKFILL: grout

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Concrete						
	Subbase						No odor or discoloration
1	Light brown silty clay	CL	90%	5	Grab	SB-1 2.5'	BETX, MTBE
2							
3							
4							
5							
6							
7							
8			90%	20.0	Grab	SB-1 7.5'	BETX, MTBE
9							
10							Wet
	End of Boring 10'						
11							
12							
13							
14							
15							

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

NOTES: Sampled at 2.5 and 7.5 per regs

Manway / Surface Elevation:

	Groundwater Depth While Drilling:	~ 10	Auger Depth:	Driller:	AEDC
	Groundwater Depth After Drilling:		Rotary Depth:	Geologist:	MDR,MJS



Illinois Environmental Protection Agency

**CW M COMPANY, INC.
DRILLING BOREHOLE LOG**

Page 1 of 1

PROJECT INCIDENT # 2013-0157	BOREHOLE NUMBER: SB-2
SITE NAME: Aman Food & Gas - Moline	BORING LOCATION: 37' E and 7' N of NE corner of building
SITE ADDRESS: 1830 5th Avenue Moline, IL 61265	RIG TYPE: Truck Mounted Drill Rig
DATE/TIME STARTED: 10/1/14 1:30	DRILLING/SAMPLE METHOD: Push
DATE/TIME FINISHED: 10/1/14 1:45	BACKFILL: grout

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Concrete						
	Subbase						No odor or discoloration
1	Dark brown silty clay	CL	95%	12	Grab	SB-2 2.5'	BETX, MTBE
2							
3	Brown silty clay	CL	100%	8.0	Grab	SB-2 7.5'	BETX, MTBE
4							
5							
6							
7	End of Boring 10'						wet
8							
9							
10							
11							
12							
13							
14							
15							

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

NOTES: Sampled 2.5 and 7.5 per regs

Manway / Surface Elevation:

▼ Groundwater Depth While Drilling:	~ 10	Auger Depth:	Driller:	AEDC
▽ Groundwater Depth After Drilling:		Rotary Depth:	Geologist:	MDR/MJS



Illinois Environmental Protection Agency

**CW M COMPANY, INC.
DRILLING BOREHOLE LOG**

Page 1 of 1

JUST INCIDENT # 2013-0157	BOREHOLE NUMBER: SB-3
SITE NAME: Aman Food & Gas - Moline	BORING LOCATION: 25' N and 17' E of NE corner building
SITE ADDRESS: 1830 5th Avenue Moline, IL 61265	RIG TYPE: Truck Mounted Drill Rig
DATE/TIME STARTED: 10/1/14 1:45	DRILLING/SAMPLE METHOD: push
DATE/TIME FINISHED: 10/1/14 2:00	BACKFILL: grout

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)	
0	Concrete							
	Subbase						No Odor / Discoloration	
1	Brown silty clay	CL						
2			90%	23	Grab	SB-3 2.5'	BETX, MTBE	
3								
4								
5								
6								
7								
8			100%	54.0	Grab	SB-3 7.5	BETX, MTBE	
9								
10								Wet
11	End of Boring 10'							
12								
13								
14								
15								

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

NOTES: Sampled 2.5 and 7.5 per regs

Manway / Surface Elevation:

▼ Groundwater Depth While Drilling: ~ 10	Auger Depth:	Driller:	AEDC
▽ Groundwater Depth After Drilling:	Rotary Depth: 10'	Geologist:	MDR,MJS

 Illinois Environmental Protection Agency			CW M COMPANY, INC. DRILLING BOREHOLE LOG				
			Page 1 of 1				
INCIDENT # 2014-0247 SITE NAME: Aman Food & Gas - Moline 1830 5th Avenue Moline, IL 61265			BOREHOLE NUMBER: MW-1 BORING LOCATION: 35' S and 10' W of SE corner of building RIG TYPE: Truck mounted drill rig DRILLING/SAMPLE METHOD: Auger BACKFILL: well set				
DATE/TIME STARTED: 10-1-14 9:30			DATE/TIME FINISHED: 10-1-14 10:15				
DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Subbase						No odor or discoloration
1	Light brown silty clay	CL	90%	10.0	Grab	MW-1 2.5'	BETX, MTBE
2							
3							
4	Brown silty clay with trace of sand	CL	100%	12.0	Grab	MW-1 7.5'	BETX, MTBE
5							
6							
7							
8							
9							
10							
11							wet
12							
13			100%				
14							
15	End of boring 15'						
Stratification lines are approximate, in situ transition between soil types may be gradual. NOTES: sampled 2.5 and 7.5 per regs							
Manway / Surface Elevation:			102.2'				
 Groundwater Depth While Drilling:			~ 10'		Auger Depth:	15'	Driller: AEDC
 Groundwater Depth After Drilling:					Rotary Depth:		Installer: MDR/MJS



Illinois Environmental Protection Agency

**CW M COMPANY, INC.
DRILLING BOREHOLE LOG**

Page 1 of 1

ILLUSTRATION # 2014-0247	BOREHOLE NUMBER: MW-2
SITE NAME: Aman Food & Gas - Moline	BORING LOCATION: 36' E and 54' N of SE corner of building
1830 5th Avenue Moline, IL 61265	RIG TYPE: Truck mounted drill rig
DATE/TIME STARTED: 10-1-14 10:15	DRILLING/SAMPLE METHOD: Auger
DATE/TIME FINISHED: 10-1-14 11:00	BACKFILL: well set

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Concrete						
0	Subbase						No odor or discoloration
1	Dark brown silty clay	CL					
2			95%	15.0	Grab	MW-2 2.5'	BETX, MTBE
3							
4	Brown silty clay	CL					
5							
6							
7							
8	Brown silty clay with traces of sand	CL		10.0	Grab	MW-2 7.5'	BETX, MTBE
9							
10							wet
11							
12							
13			90%				
14							
15	End of boring 15'						

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

NOTES: sampled 2.5 and 7.5 per regs

Manway / Surface Elevation:	101.18'				
▼ Groundwater Depth While Drilling:	~ 10'	Auger Depth:	15'	Driller:	AEDC
▽ Groundwater Depth After Drilling:		Rotary Depth:		Installer:	MDR/MJS



Illinois Environmental Protection Agency

**CW M COMPANY, INC.
DRILLING BOREHOLE LOG**

Page 1 of 1

PROJECT INCIDENT # 2014-0247	BOREHOLE NUMBER: MW-3
SITE NAME: Aman Food & Gas - Moline 1830 5th Avenue Moline, IL 61265	BORING LOCATION: 40' N and 5' W of NE corner of building
DATE/TIME STARTED: 10-1-14 11:00	RIG TYPE: Truck mounted drill rig
DATE/TIME FINISHED: 10-1-14 11:45	DRILLING/SAMPLE METHOD: Auger
	BACKFILL: set 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							
	Subbase						No odor / discoloration	
1	Dark brown silty clay	CL						
2			90%	25.0	Grab	MW-3 2.5'	BETX, MTBE	
3								
4	Brown silty clay	CL						
5								
6								
7			100%	42.0	Grab	MW-3 7.5'	BETX, MTBE	
8								
9								
10							wet	
11								
12								
13			100%					
14								
15	End of boring 15'							

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

NOTES: sampled 2.5 and 7.5 per regs

Manway / Surface Elevation: 100.0'

▼ Groundwater Depth While Drilling: ~ 10'	Auger Depth: 15'	Driller: AEDC
▽ Groundwater Depth After Drilling:	Rotary Depth:	Installer: MDR/MJS



Illinois Environmental Protection Agency

**CW M COMPANY, INC.
DRILLING BOREHOLE LOG**

Page 1 of 1

LAST INCIDENT # 2014-0247	BOREHOLE NUMBER: MW-4
SITE NAME: Aman Food & Gas - Moline 1830 5th Avenue Moline, IL 61265	BORING LOCATION: 10' W and 45' N of SW corner of building
DATE/TIME STARTED: 10-1-14 11:45	RIG TYPE: Truck mounted drill rig
DATE/TIME FINISHED: 10-1-14 12:30	DRILLING/SAMPLE METHOD: Auger
	BACKFILL: set 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	Top soil						No Odor / Discoloration
2	Dark brown silty clay	CL	95%	11.0	G	MW-4 2.5'	BETX, MTBE
4	Brown silty clay	CL					
7			100%	16.0	G	MW-4 7.5	BETX, MTBE
10							wet
15	End of boring 15'						

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

NOTES: sampled 2.5 and 7.5 per regs

Manway / Surface Elevation: 101.79'

▼ Groundwater Depth While Drilling: ~10'	Auger Depth: 15'	Driller: AEDC
▽ Groundwater Depth After Drilling:	Rotary Depth:	Installer: MDR/MJS



Illinois Environmental Protection Agency

**CW M COMPANY, INC.
DRILLING BOREHOLE LOG**

Page 1 of 1

PLUST INCIDENT # 2014-0247	BOREHOLE NUMBER: MW-5
SITE NAME: Aman Food & Gas - Moline 1830 5th Avenue Moline, IL 61265	BORING LOCATION: 3' W & 6' N of NE corner of building
DATE/TIME STARTED: 10-1-14 12:30	RIG TYPE: Truck Mounted Drill
DATE/TIME FINISHED: 10-1-14 1:15	DRILLING/SAMPLE METHOD: 5' continuous samplers
	BACKFILL: Well Set

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	concrete with gravel subbase	OM					Odor and Discoloration
1							
2	backfill sand		90%	700	-	-	
3							
4							
5							
6							
7							
8			100%	1200.0	-	-	
9							
10							wet
11							
12							
13							
14							
15	End of Boring 15'						

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

NOTES: Well Installation; Field Screened Only

Manway / Surface Elevation:	101.75'				
▼ Groundwater Depth While Drilling:	10'	Auger Depth:	15'	Driller:	AEDC
▽ Groundwater Depth After Drilling:		Rotary Depth:		Installer:	MDR/MJS

Illinois Environmental Protection Agency

LUST Well Completion Report

Incident No. 2014-0247
 Site Name Aman Food & Gas
 Drilling Contractor AEDC
 Driller AEDC
 Drilling Method Hollow Stem Auger

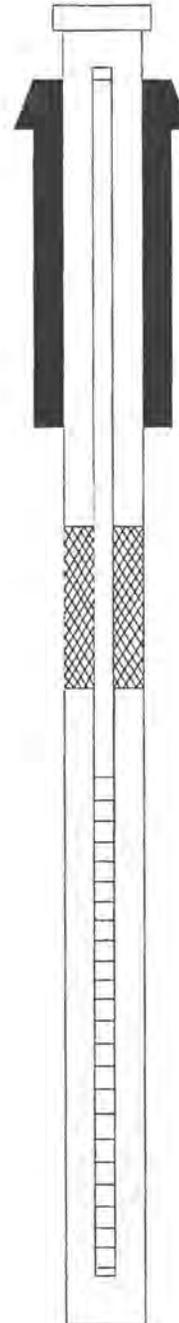
Well No. MW-1
 Date Drilled 10/1/2014
 Date Completed 10/1/2014
 Geologist MDR/MJS
 Drilling Fluids N/A

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



Top of Protective Casing 102.20 ft.
 Top of riser pipe 101.95 ft.
 Ground surface 102.20 ft.
 Top of Annular Sealant 101.70 ft.
 Casing Stickup N/A

Top of Seal 101.70 ft.
 Total Seal interval 3.00 ft.
 Top of Sand 98.70 ft.
 Top of Screen 97.70 ft.

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	10' ft. while drilling
Depth to Water	91.68 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	Approximately 1 gallon
Gallons removed (purge)	Approximately 1 gallon
Other	

Total Screen Interval 10.0 ft.

Completed by: MJS

Bottom of Screen 87.70 ft.
 Bottom of Borehole 87.20 ft.

Illinois Environmental Protection Agency

LUST Well Completion Report

Incident No. 2014-0247
 Site Name Aman Food & Gas
 Drilling Contractor AEDC
 Driller AEDC
 Drilling Method Hollow Stem Auger

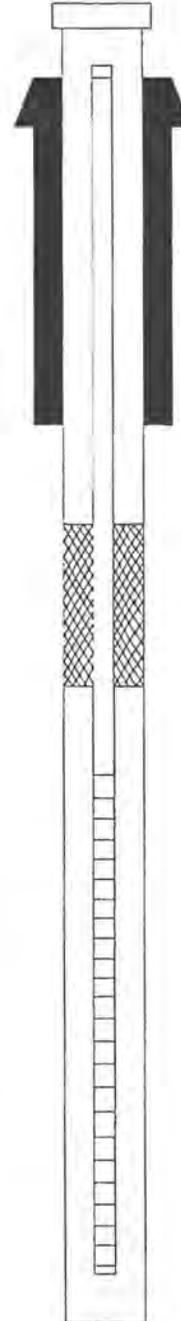
Well No. MW-2
 Date Drilled 10/1/2014
 Date Completed 10/1/2014
 Geologist MDR/MJS
 Drilling Fluids N/A

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



Top of Protective Casing 101.18 ft.
 Top of riser pipe 100.93 ft.
 Ground surface 101.18 ft.
 Top of Annular Sealant 100.68 ft.
 Casing Stickup N/A

Top of Seal 100.68 ft.
 Total Seal interval 3.00 ft.
 Top of Sand 97.68 ft.
 Top of Screen 96.68 ft.

Total Screen Interval 10.0 ft.

Bottom of Screen 86.68 ft.
 Bottom of Borehole 86.18 ft.

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	10' ft. while drilling
Depth to Water	96.07 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	Approximately 1 gallon
Gallons removed (purge)	Approximately 1 gallon
Other	

Completed by: MJS

Illinois Environmental Protection Agency

LUST Well Completion Report

Incident No. 2014-0247
 Site Name Aman Food & Gas
 Drilling Contractor AEDC
 Driller AEDC
 Drilling Method Hollow Stem Auger

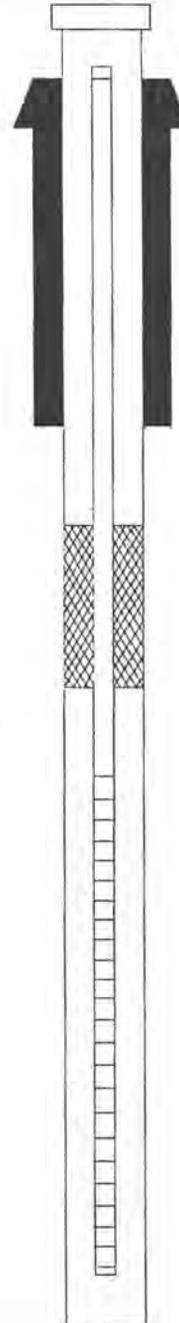
Well No. MW-3
 Date Drilled 10/1/2014
 Date Completed 10/1/2014
 Geologist MDR/MJS
 Drilling Fluids N/A

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		Sched.-40	
Screen to Riser			
Protective Casing			Steel



Top of Protective Casing 100.00 ft.
 Top of riser pipe 99.75 ft.
 Ground surface 100.00 ft.
 Top of Annular Sealant 99.50 ft.
 Casing Stickup N/A

Top of Seal 99.50 ft.
 Total Seal interval 3.00 ft.
 Top of Sand 96.50 ft.
 Top of Screen 95.50 ft.

Total Screen Interval 10.0 ft.

Bottom of Screen 85.50 ft.
 Bottom of Borehole 85.00 ft.

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	10' ft. while drilling
Depth to Water	90.87 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	Approximately 1 gallon
Gallons removed (purge)	Approximately 1 gallon
Other	

Completed by: MJS

Illinois Environmental Protection Agency

LUST Well Completion Report

Incident No. 2014-0247
 Site Name Aman Food & Gas
 Drilling Contractor AEDC
 Driller AEDC
 Drilling Method Hollow Stem Auger

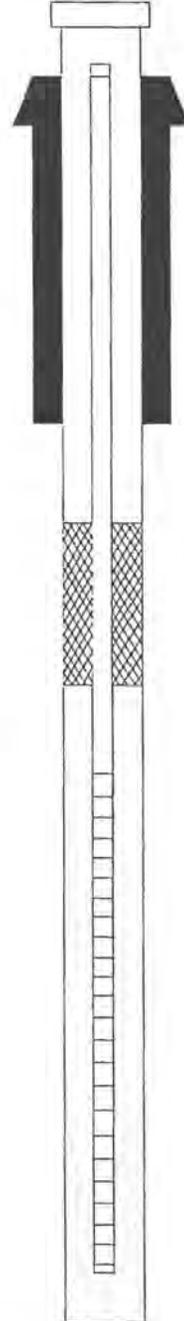
Well No. MW-4
 Date Drilled 10/1/2014
 Date Completed 10/1/2014
 Geologist MDR/MJS
 Drilling Fluids N/A

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.L.		Sched.-40	
Riser Pipe Below w.L.			
Screen		Sched.-40	
Coupling Joint Screen to Riser		Sched.-40	
Protective Casing			Steel



Top of Protective Casing 101.79 ft.
 Top of riser pipe 101.54 ft.
 Ground surface 101.79 ft.
 Top of Annular Sealant 101.29 ft.
 Casing Stickup N/A

Top of Seal 101.29 ft.
 Total Seal interval 3.00 ft.
 Top of Sand 98.29 ft.
 Top of Screen 97.29 ft.

Total Screen Interval 10.0 ft.

Bottom of Screen 87.29 ft.
 Bottom of Borehole 86.79 ft.

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	10' ft. while drilling
Depth to Water	88.36 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	Approximately 1 gallon
Gallons removed (purge)	Approximately 1 gallon
Other	

Completed by: MJS

Illinois Environmental Protection Agency

LUST Well Completion Report

Incident No. 2014-0247
 Site Name Aman Food & Gas
 Drilling Contractor AEDC
 Driller AEDC
 Drilling Method Hollow Stem Auger

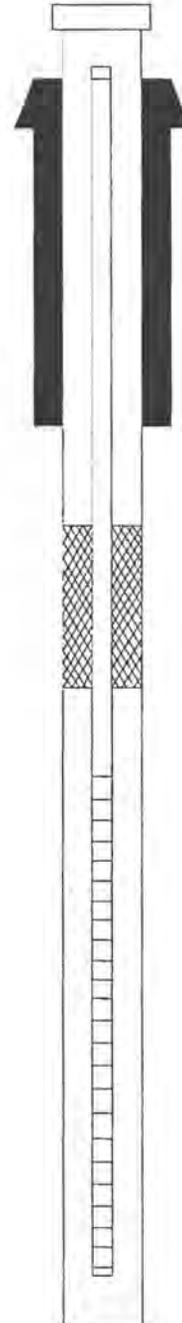
Well No. MW-5
 Date Drilled 10/1/2014
 Date Completed 10/1/2014
 Geologist MDR/MJS
 Drilling Fluids N/A

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



Top of Protective Casing 101.75 ft.
 Top of riser pipe 101.50 ft.
 Ground surface 101.75 ft.
 Top of Annular Sealant 101.25 ft.
 Casing Stickup N/A

Top of Seal 101.25 ft.
 Total Seal interval 3.00 ft.
 Top of Sand 98.25 ft.
 Top of Screen 97.25 ft.

Total Screen Interval 10.0 ft.

Bottom of Screen 87.25 ft.
 Bottom of Borehole 86.75 ft.

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	10' ft. while drilling
Depth to Water	93.03 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	Approximately 1 gallon
Gallons removed (purge)	Approximately 1 gallon
Other	

Completed by: MJS



Illinois Environmental Protection Agency

**CW M COMPANY, INC.
DRILLING BOREHOLE LOG**

Page 1 of 1

PLAST INCIDENT # 2014-0247	BOREHOLE NUMBER: WC-1
SITE NAME: Aman Food & Gas - Moline	BORING LOCATION: 3' West & 6' North of Northeast Corner of Building
SITE ADDRESS: 1830 5th Avenue Moline, IL 61265	RIG TYPE: Geoprobe
DATE/TIME STARTED: 3-3-2014 11:10	DRILLING/SAMPLE METHOD: continuous sampling/hollow stem auger
DATE/TIME FINISHED: 3-3-2014 11:30	BACKFILL: grout

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0							
1	concrete with gravel subbase	OM					odor and discoloration throughout worsening with depth
2							
3	backfill sand		90%	695	grab	WC1-2.5'	
4							
5							
6							
7							
8			100%	1245.0	grab	WC1-7.5	BETX, MTBE
9							softens
10	End of boring 10'						
11							
12							
13							
14							
15							

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

NOTES: Sample collected at 7.5' depth based on PID reading, odor and discoloration

Manway / Surface Elevation:

▼ Groundwater Depth While Drilling:	10'	Auger Depth:	10'	Driller:	CW M
▽ Groundwater Depth After Drilling:		Rotary Depth:		Geologist:	MDR



Illinois Environmental Protection Agency

**CW M COMPANY, INC.
DRILLING BOREHOLE LOG**

Page 1 of 1

LAST INCIDENT # 2014-0247	BOREHOLE NUMBER: WC-2
SITE NAME: Aman Food & Gas - Moline	BORING LOCATION: 15'W and 33'N of NW Corner of Building
SITE ADDRESS: 1830 5th Avenue Moline, IL 61265	RIG TYPE: Geoprobe
DATE/TIME STARTED: 3-3-2014 11:30	DRILLING/SAMPLE METHOD: continuous sampling/hollow stem auger
DATE/TIME FINISHED: 3-3-2014 11:50	BACKFILL: grout

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0							
1	concrete with gravel subbase	OM					odor and discoloration throughout most visable at 5'
2							
3	backfill sand		90%				
4							
5				850	grab	WC2-2.5'	BETX, MTBE, Flash point, PH Paint Filter
6	Grey Mottled Brown clayey silt, loam trace sand	CL					
7							
8			100%	422.0	grab	WC2-7.5	
9							
10	End of boring 10'						
11							
12							
13							
14							
15							

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

NOTES: Sample collected at 7.5' depth based on PID reading, odor and discoloration

Manway / Surface Elevation:

▼ Groundwater Depth While Drilling: 10'	Auger Depth: 10'	Driller: CW M
▽ Groundwater Depth After Drilling:	Rotary Depth:	Geologist: MDR

APPENDIX F
ANALYTICAL RESULTS

**STAGE 2 SITE INVESTIGATION
PLAN AND BUDGET**

**AMAN FOOD & GAS
MOLINE, ILLINOIS**

Aman Food Gas
Site Assessment Data

Waste Characterization

	Location	WC-1	WC-2
	Date	3/3/2014	3/3/2014
	Depth		
Parameter	Class I CUO		
Benzene	0.03	4.08	0.12
Ethylbenzene	13.0	83.3	4.86
Toluene	12.0	84.2	3.44
Total Xylenes	5.6	466.	23.7
MTBE	5.6	ND	ND

Aman Food Gas
Soil Data

Early Action

	Location	1	2	3	4	5	6	7
	Date	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014
	Depth							
Parameter	Class I CUO							
Benzene	0.03	0.561	1.4	2.2	1.63	0.14	0.463	0.151
Ethylbenzene	13.0	6.36	28.2	6.42	20.4	0.237	ND	1.3
Toluene	12.0	0.338	0.207	0.102	1.96	ND	ND	1.96
Total Xylenes	5.6	19.1	115.	8.27	93.5	0.879	0.184	7.48
MTBE	0.32	ND						

Aman Food Gas
Soil Data

Early Action

	Location	8	9	10	11	12	13	14
	Date	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014
	Depth							
Parameter	Class I CUO							
Benzene	0.03	20.3	0.28	0.0467	ND	ND	1.22	0.41
Ethylbenzene	13.0	34.7	4.73	ND	ND	ND	10.3	9.91
Toluene	12.0	133.	10.3	0.0825	ND	ND	0.156	ND
Total Xylenes	5.6	170.	26.1	0.227	ND	ND	24.2	1.7
MTBE	0.32	ND						

Aman Food Gas
Soil Data

Early Action

	Location	15	16	17
	Date	5/5/2014	5/5/2014	5/5/2014
	Depth			
Parameter	Class I CUO			
Benzene	0.03	0.346	0.0637	ND
Ethylbenzene	13.0	8.08	0.169	ND
Toluene	12.0	3.05	0.417	ND
Total Xylenes	5.6	41.4	0.924	ND
MTBE	0.32	ND	ND	ND

Aman Food Gas
Soil Data

Stage 1 Soil

	Location	MW-1	MW-1	MW-2	MW-2	MW-3	MW-3	MW-4
	Date	10/1/2014	10/1/2014	10/1/2014	10/1/2014	10/1/2014	10/1/2014	10/1/2014
	Depth	2.5	7.5	2.5	7.5	2.5	7.5	2.5
Parameter	Class I CUO							
Benzene	0.03	ND						
Ethylbenzene	13.0	ND						
Toluene	12.0	ND						
Total Xylenes	5.6	ND						
MTBE	0.32	ND						

Aman Food Gas
Soil Data

Stage 1 Soil

	Location	MW-4	SB-1	SB-1	SB-2	SB-2	SB-3	SB-3
	Date	10/1/2014	10/1/2014	10/1/2014	10/1/2014	10/1/2014	10/1/2014	10/1/2014
	Depth	7.5	2.5	7.5	2.5	7.5	2.5	7.5
Parameter	Class I CUO							
Benzene	0.03	ND						
Ethylbenzene	13.0	ND						
Toluene	12.0	ND						
Total Xylenes	5.6	ND						
MTBE	0.32	ND						

Aman Food Gas
Site Assessment Data

Stage 1 GW

	Location	MW-1	MW-2	MW-3	MW-4	MW-5
	Date	12/11/2014	12/11/2014	12/11/2014	12/11/2014	12/11/2014
Parameter	Class I CUO					
Benzene	0.005	ND	ND	0.084	ND	ND
Ethylbenzene	0.7	ND	ND	0.054	0.034	ND
Toluene	1.0	ND	ND	0.006	0.198	ND
Total Xylenes	10.0	ND	ND	0.051	0.11	ND
MTBE	0.07	ND	ND	ND	ND	ND

SUBURBAN LABORATORIES, Inc.



INVOICE
FEIN # 36-2695636

1950 S. Batavia Ave., Suite 150, Geneva, IL 60134
Tel (708) 544-3260 Toll Free (800) 783-5227
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#: 116743
Date: 10/14/2014

Terms: NET90
Invoice Due: 1/12/2015

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

PO:
Report To: Carol Rowe
Fax: (217) 522-8009
Project: Aman Food and Gas
Priority: Priority: Rush

Workorder: 1410259

Item Description	Matrix	Remarks	Qty	Unit Price	Total
BTEX + MTBE Solid	Soil	July 2014 - June 2015	14	\$103.26	\$1,445.64

Item	Unit	Qty	Total
5035 Sampling Kit	\$12.15	14	\$170.10
Shipping & Handling	\$60.74	1	\$60.74

Sub Total: \$1,445.64
Misc. Charges: \$230.84
Surcharges: 0 %
INVOICE Total: \$1,676.48
Pre-Paid Amount: \$0.00

Total Payable Amount: \$1,676.48

Comments: Terms per signed agreement.

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www.suburbanlabs.com

October 14, 2014

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

Work Order: 1410259

TEL: (217) 522-8001
FAX: (217) 522-8009
RE: Aman Food and Gas



Dear Carol Rowe:

Suburban Laboratories, Inc. received 14 sample(s) on 10/7/2014 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

Illinois Department of Public Health #17585



Illinois EPA #100225 Wisconsin FID# 399089350

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Page 1 of 15

SUBURBAN LABORATORIES, Inc.

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Case Narrative

Client: CWM_INC
Project: Aman Food and Gas

Date: October 14, 2014

PO:

WorkOrder: 1410259

QC Level:

Temperature of samples upon receipt at lab: 2 C

Chain of Custody: 113432

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.
- All water analyses that are required to be performed in the field (e.g., pH, residual chlorine, sulfite, temperature, etc.) but are analyzed in the lab are identified as "in lab" and are considered past holding time. Following industry practices these results do not contain an "H" flag but are qualified as being analyzed in the lab.

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
- 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:

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Laboratory Results

Client: CWM Company, Inc

Report Date: October 14, 2014

Project: Aman Food and Gas

Workorder: 1410259

Client Sample ID: MW-1 (2.5)

Matrix: Soil

Lab ID: 1410259-001

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 9:35 AM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID	
VOLATILE ORGANIC COMPOUNDS								
		Method: 8260B-2, Dec-96						Analyst: ls
Benzene	ND	0.0127		mg/Kg-dry	40.89	10/9/2014 6:34 PM	R52383	
Ethylbenzene	ND	0.0507		mg/Kg-dry	40.89	10/9/2014 6:34 PM	R52383	
m,p-Xylene	ND	0.101		mg/Kg-dry	40.89	10/9/2014 6:34 PM	R52383	
Methyl tert-butyl ether	ND	0.0507		mg/Kg-dry	40.89	10/9/2014 6:34 PM	R52383	
o-Xylene	ND	0.0507		mg/Kg-dry	40.89	10/9/2014 6:34 PM	R52383	
Total Xylenes	ND	0.101		mg/Kg-dry	40.89	10/9/2014 6:34 PM	R52383	
Toluene	ND	0.0507		mg/Kg-dry	40.89	10/9/2014 6:34 PM	R52383	
<u>Internal Quality Control Compounds</u>								
Surr: 4-Bromofluorobenzene	93.7	0		%REC	40.89	10/9/2014 6:34 PM	R52383	
Surr: Dibromofluoromethane	107	0		%REC	40.89	10/9/2014 6:34 PM	R52383	
Surr: Toluene-d8	97.9	0		%REC	40.89	10/9/2014 6:34 PM	R52383	
PERCENT MOISTURE								
		Method: D2216-2005						Analyst: erw
Percent Moisture	19	1.0		wt%	1	10/7/2014 11:05 AM	R52221	

Client Sample ID: MW-1 (7.5)

Matrix: Soil

Lab ID: 1410259-002

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 9:40 AM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID	
VOLATILE ORGANIC COMPOUNDS								
		Method: 8260B-2, Dec-96						Analyst: ls
Benzene	ND	0.0119		mg/Kg-dry	38.4	10/9/2014 7:07 PM	R52383	
Ethylbenzene	ND	0.0477		mg/Kg-dry	38.4	10/9/2014 7:07 PM	R52383	
m,p-Xylene	ND	0.0955		mg/Kg-dry	38.4	10/9/2014 7:07 PM	R52383	
Methyl tert-butyl ether	ND	0.0477		mg/Kg-dry	38.4	10/9/2014 7:07 PM	R52383	
o-Xylene	ND	0.0477		mg/Kg-dry	38.4	10/9/2014 7:07 PM	R52383	
Total Xylenes	ND	0.0955		mg/Kg-dry	38.4	10/9/2014 7:07 PM	R52383	
Toluene	ND	0.0477		mg/Kg-dry	38.4	10/9/2014 7:07 PM	R52383	
<u>Internal Quality Control Compounds</u>								
Surr: 4-Bromofluorobenzene	93.4	0		%REC	38.4	10/9/2014 7:07 PM	R52383	
Surr: Dibromofluoromethane	106	0		%REC	38.4	10/9/2014 7:07 PM	R52383	
Surr: Toluene-d8	98.5	0		%REC	38.4	10/9/2014 7:07 PM	R52383	

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Laboratory Results

Client: CWM Company, Inc

Report Date: October 14, 2014

Project: Aman Food and Gas

Workorder: 1410259

Client Sample ID: MW-1 (7.5)

Matrix: Soil

Lab ID: 1410259-002

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 9:40 AM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
PERCENT MOISTURE		Method: -D2216-2005		Analyst: erv			
Percent Moisture	20	1.0		wt%	1	10/7/2014 11:05 AM	R52221

Client Sample ID: MW-2 (2.5)

Matrix: Soil

Lab ID: 1410259-003

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 10:20 AM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
VOLATILE ORGANIC COMPOUNDS		Method: -8260B-2, Dec-96		Analyst: ls			
Benzene	ND	0.0127		mg/Kg-dry	39.89	10/9/2014 7:39 PM	R52383
Ethylbenzene	ND	0.0509		mg/Kg-dry	39.89	10/9/2014 7:39 PM	R52383
m,p-Xylene	ND	0.102		mg/Kg-dry	39.89	10/9/2014 7:39 PM	R52383
Methyl tert-butyl ether	ND	0.0509		mg/Kg-dry	39.89	10/9/2014 7:39 PM	R52383
o-Xylene	ND	0.0509		mg/Kg-dry	39.89	10/9/2014 7:39 PM	R52383
Total Xylenes	ND	0.102		mg/Kg-dry	39.89	10/9/2014 7:39 PM	R52383
Toluene	ND	0.0509		mg/Kg-dry	39.89	10/9/2014 7:39 PM	R52383
<i>Internal Quality Control Compounds</i>							
Surr: 4-Bromofluorobenzene	91.3	0		%REC	39.89	10/9/2014 7:39 PM	R52383
Surr: Dibromofluoromethane	109	0		%REC	39.89	10/9/2014 7:39 PM	R52383
Surr: Toluene-d8	96.4	0		%REC	39.89	10/9/2014 7:39 PM	R52383

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
PERCENT MOISTURE		Method: -D2216-2005		Analyst: erv			
Percent Moisture	22	1.0		wt%	1	10/7/2014 11:05 AM	R52221

Client Sample ID: MW-2 (7.5)

Matrix: Soil

Lab ID: 1410259-004

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 10:25 AM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
VOLATILE ORGANIC COMPOUNDS		Method: -8260B-2, Dec-96		Analyst: ls			
Benzene	ND	0.0115		mg/Kg-dry	37.43	10/9/2014 8:12 PM	R52383
Ethylbenzene	ND	0.0459		mg/Kg-dry	37.43	10/9/2014 8:12 PM	R52383
m,p-Xylene	ND	0.0919		mg/Kg-dry	37.43	10/9/2014 8:12 PM	R52383

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Laboratory Results

Client: CWM Company, Inc

Report Date: October 14, 2014

Project: Aman Food and Gas

Workorder: 1410259

Client Sample ID: MW-2 (7.5)

Matrix: Soil

Lab ID: 1410259-004

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 10:25 AM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
VOLATILE ORGANIC COMPOUNDS		Method: -8260B-2, Dec-96		Analyst: ls			
Methyl tert-butyl ether	ND	0.0459		mg/Kg-dry	37.43	10/9/2014 8:12 PM	R52383
o-Xylene	ND	0.0459		mg/Kg-dry	37.43	10/9/2014 8:12 PM	R52383
Total Xylenes	ND	0.0919		mg/Kg-dry	37.43	10/9/2014 8:12 PM	R52383
Toluene	ND	0.0459		mg/Kg-dry	37.43	10/9/2014 8:12 PM	R52383
<u>Internal Quality Control Compounds</u>							
Surr: 4-Bromofluorobenzene	94.8	0		%REC	37.43	10/9/2014 8:12 PM	R52383
Surr: Dibromofluoromethane	108	0		%REC	37.43	10/9/2014 8:12 PM	R52383
Surr: Toluene-d8	94.6	0		%REC	37.43	10/9/2014 8:12 PM	R52383
PERCENT MOISTURE		Method: -D2216-2005		Analyst: erw			
Percent Moisture	19	1.0		wt%	1	10/7/2014 11:05 AM	R52221

Client Sample ID: MW-3 (2.5)

Matrix: Soil

Lab ID: 1410259-005

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 11:05 AM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
VOLATILE ORGANIC COMPOUNDS		Method: -8260B-2, Dec-96		Analyst: ls			
Benzene	ND	0.0140		mg/Kg-dry	42.52	10/9/2014 8:44 PM	R52383
Ethylbenzene	ND	0.0559		mg/Kg-dry	42.52	10/9/2014 8:44 PM	R52383
m,p-Xylene	ND	0.112		mg/Kg-dry	42.52	10/9/2014 8:44 PM	R52383
Methyl tert-butyl ether	ND	0.0559		mg/Kg-dry	42.52	10/9/2014 8:44 PM	R52383
o-Xylene	ND	0.0559		mg/Kg-dry	42.52	10/9/2014 8:44 PM	R52383
Total Xylenes	ND	0.112		mg/Kg-dry	42.52	10/9/2014 8:44 PM	R52383
Toluene	ND	0.0559		mg/Kg-dry	42.52	10/9/2014 8:44 PM	R52383
<u>Internal Quality Control Compounds</u>							
Surr: 4-Bromofluorobenzene	94.2	0		%REC	42.52	10/9/2014 8:44 PM	R52383
Surr: Dibromofluoromethane	108	0		%REC	42.52	10/9/2014 8:44 PM	R52383
Surr: Toluene-d8	96.0	0		%REC	42.52	10/9/2014 8:44 PM	R52383
PERCENT MOISTURE		Method: -D2216-2005		Analyst: erw			
Percent Moisture	24	1.0		wt%	1	10/7/2014 11:05 AM	R52221

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Client Sample ID: MW-3 (7.5)

Matrix: Soil

Lab ID: 1410259-006

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 11:10 AM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
VOLATILE ORGANIC COMPOUNDS		Method: -8260B-2, Dec-96		Analyst: ls			
Benzene	ND	0.0120		mg/Kg-dry	38.44	10/9/2014 9:16 PM	R52383
Ethylbenzene	ND	0.0480		mg/Kg-dry	38.44	10/9/2014 9:16 PM	R52383
m,p-Xylene	ND	0.0960		mg/Kg-dry	38.44	10/9/2014 9:16 PM	R52383
Methyl tert-butyl ether	ND	0.0480		mg/Kg-dry	38.44	10/9/2014 9:16 PM	R52383
o-Xylene	ND	0.0480		mg/Kg-dry	38.44	10/9/2014 9:16 PM	R52383
Total Xylenes	ND	0.0960		mg/Kg-dry	38.44	10/9/2014 9:16 PM	R52383
Toluene	ND	0.0480		mg/Kg-dry	38.44	10/9/2014 9:16 PM	R52383
<u>Internal Quality Control Compounds</u>							
Surr: 4-Bromofluorobenzene	96.2	0		%REC	38.44	10/9/2014 9:16 PM	R52383
Surr: Dibromofluoromethane	106	0		%REC	38.44	10/9/2014 9:16 PM	R52383
Surr: Toluene-d8	98.5	0		%REC	38.44	10/9/2014 9:16 PM	R52383
PERCENT MOISTURE		Method: -D2216-2005		Analyst: erw			
Percent Moisture	20	1.0		wt%		10/7/2014 11:05 AM	R52221

Client Sample ID: MW-4 (2.5)

Matrix: Soil

Lab ID: 1410259-007

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 11:50 AM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
VOLATILE ORGANIC COMPOUNDS		Method: -8260B-2, Dec-96		Analyst: ls			
Benzene	ND	0.0122		mg/Kg-dry	38.81	10/9/2014 9:49 PM	R52383
Ethylbenzene	ND	0.0489		mg/Kg-dry	38.81	10/9/2014 9:49 PM	R52383
m,p-Xylene	ND	0.0978		mg/Kg-dry	38.81	10/9/2014 9:49 PM	R52383
Methyl tert-butyl ether	ND	0.0489		mg/Kg-dry	38.81	10/9/2014 9:49 PM	R52383
o-Xylene	ND	0.0489		mg/Kg-dry	38.81	10/9/2014 9:49 PM	R52383
Total Xylenes	ND	0.0978		mg/Kg-dry	38.81	10/9/2014 9:49 PM	R52383
Toluene	ND	0.0489		mg/Kg-dry	38.81	10/9/2014 9:49 PM	R52383
<u>Internal Quality Control Compounds</u>							
Surr: 4-Bromofluorobenzene	93.9	0		%REC	38.81	10/9/2014 9:49 PM	R52383
Surr: Dibromofluoromethane	105	0		%REC	38.81	10/9/2014 9:49 PM	R52383
Surr: Toluene-d8	98.7	0		%REC	38.81	10/9/2014 9:49 PM	R52383
PERCENT MOISTURE		Method: -D2216-2005		Analyst: erw			
Percent Moisture	21	1.0		wt%		10/7/2014 11:05 AM	R52221

Client Sample ID: MW-4 (7.5)

Matrix: Soil

Lab ID: 1410259-008

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 11:55 AM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
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Laboratory Results

Client: CWM Company, Inc

Report Date: October 14, 2014

Project: Aman Food and Gas

Workorder: 1410259

Client Sample ID: MW-4 (7.5)

Matrix: Soil

Lab ID: 1410259-008

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 11:55 AM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
VOLATILE ORGANIC COMPOUNDS		Method: -8260B-2, Dec-96		Analyst: ls			
Benzene	ND	0.0136		mg/Kg-dry	43.96	10/9/2014 10:21 PM	R52383
Ethylbenzene	ND	0.0543		mg/Kg-dry	43.96	10/9/2014 10:21 PM	R52383
m,p-Xylene	ND	0.109		mg/Kg-dry	43.96	10/9/2014 10:21 PM	R52383
Methyl tert-butyl ether	ND	0.0543		mg/Kg-dry	43.96	10/9/2014 10:21 PM	R52383
o-Xylene	ND	0.0543		mg/Kg-dry	43.96	10/9/2014 10:21 PM	R52383
Total Xylenes	ND	0.109		mg/Kg-dry	43.96	10/9/2014 10:21 PM	R52383
Toluene	ND	0.0543		mg/Kg-dry	43.96	10/9/2014 10:21 PM	R52383
<u>Internal Quality Control Compounds</u>							
Surr: 4-Bromofluorobenzene	93.2	0		%REC	43.96	10/9/2014 10:21 PM	R52383
Surr: Dibromofluoromethane	105	0		%REC	43.96	10/9/2014 10:21 PM	R52383
Surr: Toluene-d8	95.9	0		%REC	43.96	10/9/2014 10:21 PM	R52383
PERCENT MOISTURE		Method: -D2216-2005		Analyst: erw			
Percent Moisture	19	1.0		wt%	1	10/7/2014 11:05 AM	R52221

Client Sample ID: SB-1 (2.5)

Matrix: Soil

Lab ID: 1410259-009

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 13:20 PM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
VOLATILE ORGANIC COMPOUNDS		Method: -8260B-2, Dec-96		Analyst: ls			
Benzene	ND	0.0153		mg/Kg-dry	50.79	10/9/2014 10:54 PM	R52383
Ethylbenzene	ND	0.0611		mg/Kg-dry	50.79	10/9/2014 10:54 PM	R52383
m,p-Xylene	ND	0.122		mg/Kg-dry	50.79	10/9/2014 10:54 PM	R52383
Methyl tert-butyl ether	ND	0.0611		mg/Kg-dry	50.79	10/9/2014 10:54 PM	R52383
o-Xylene	ND	0.0611		mg/Kg-dry	50.79	10/9/2014 10:54 PM	R52383
Total Xylenes	ND	0.122		mg/Kg-dry	50.79	10/9/2014 10:54 PM	R52383
Toluene	ND	0.0611		mg/Kg-dry	50.79	10/9/2014 10:54 PM	R52383
<u>Internal Quality Control Compounds</u>							
Surr: 4-Bromofluorobenzene	95.5	0		%REC	50.79	10/9/2014 10:54 PM	R52383
Surr: Dibromofluoromethane	107	0		%REC	50.79	10/9/2014 10:54 PM	R52383
Surr: Toluene-d8	95.0	0		%REC	50.79	10/9/2014 10:54 PM	R52383

Rpt Ver: 10/14/2014 1:06 PM

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SUBURBAN LABORATORIES, Inc.

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



Laboratory Results

Client: CWM Company, Inc

Report Date: October 14, 2014

Project: Aman Food and Gas

Workorder: 1410259

Client Sample ID: SB-1 (2.5)

Matrix: Soil

Lab ID: 1410259-009

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 13:20 PM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
PERCENT MOISTURE		Method: -D2216-2005	Analyst: erw				
Percent Moisture	17	1.0		wt%	1	10/7/2014 11:05 AM	R52221

Client Sample ID: SB-1 (7.5)

Matrix: Soil

Lab ID: 1410259-010

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 13:25 PM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
VOLATILE ORGANIC COMPOUNDS		Method: -8260B-2, Dec-96	Analyst: ls				
Benzene	ND	0.0135		mg/Kg-dry	43.5	10/10/2014 11:21 AM	R52368
Ethylbenzene	ND	0.0542		mg/Kg-dry	43.5	10/10/2014 11:21 AM	R52368
m,p-Xylene	ND	0.108		mg/Kg-dry	43.5	10/10/2014 11:21 AM	R52368
Methyl tert-butyl ether	ND	0.0542		mg/Kg-dry	43.5	10/10/2014 11:21 AM	R52368
o-Xylene	ND	0.0542		mg/Kg-dry	43.5	10/10/2014 11:21 AM	R52368
Total Xylenes	ND	0.108		mg/Kg-dry	43.5	10/10/2014 11:21 AM	R52368
Toluene	ND	0.0542		mg/Kg-dry	43.5	10/10/2014 11:21 AM	R52368
<u>Internal Quality Control Compounds</u>							
Surr: 4-Bromofluorobenzene	105	0		%REC	43.5	10/10/2014 11:21 AM	R52368
Surr: Dibromofluoromethane	99.4	0		%REC	43.5	10/10/2014 11:21 AM	R52368
Surr: Toluene-d8	101	0		%REC	43.5	10/10/2014 11:21 AM	R52368

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
PERCENT MOISTURE		Method: -D2216-2005	Analyst: erw				
Percent Moisture	20	1.0		wt%	1	10/7/2014 11:05 AM	R52221

Client Sample ID: SB-2 (2.5)

Matrix: Soil

Lab ID: 1410259-011

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 13:35 PM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
VOLATILE ORGANIC COMPOUNDS		Method: -8260B-2, Dec-96	Analyst: ls				
Benzene	ND	0.0141		mg/Kg-dry	45.87	10/10/2014 11:58 AM	R52368
Ethylbenzene	ND	0.0564		mg/Kg-dry	45.87	10/10/2014 11:58 AM	R52368
m,p-Xylene	ND	0.113		mg/Kg-dry	45.87	10/10/2014 11:58 AM	R52368

Rpt Ver: 10/14/2014 1:06 PM

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SUBURBAN LABORATORIES, Inc.

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



Laboratory Results

Client: CWM Company, Inc
 Project: Aman Food and Gas
 Client Sample ID: SB-2 (2.5)

Report Date: October 14, 2014
 Workorder: 1410259
 Matrix: Soil

Lab ID: 1410259-011

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 13:35 PM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
VOLATILE ORGANIC COMPOUNDS		Method: -8260B-2, Dec-96				Analyst: ls	
Methyl tert-butyl ether	ND	0.0564		mg/Kg-dry	45.87	10/10/2014 11:58 AM	R52368
o-Xylene	ND	0.0564		mg/Kg-dry	45.87	10/10/2014 11:58 AM	R52368
Total Xylenes	ND	0.113		mg/Kg-dry	45.87	10/10/2014 11:58 AM	R52368
Toluene	ND	0.0564		mg/Kg-dry	45.87	10/10/2014 11:58 AM	R52368
<u>Internal Quality Control Compounds</u>							
Surr: 4-Bromofluorobenzene	109	0		%REC	45.87	10/10/2014 11:58 AM	R52368
Surr: Dibromofluoromethane	99.4	0		%REC	45.87	10/10/2014 11:58 AM	R52368
Surr: Toluene-d8	104	0		%REC	45.87	10/10/2014 11:58 AM	R52368
PERCENT MOISTURE		Method: -D3216-2005				Analyst: erw	
Percent Moisture	19	1.0		wt%	1	10/7/2014 11:05 AM	R52221

Client Sample ID: SB-2 (7.5)

Matrix: Soil

Lab ID: 1410259-012

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 13:40 PM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
VOLATILE ORGANIC COMPOUNDS		Method: -8260B-2, Dec-96				Analyst: ls	
Benzene	ND	0.0141		mg/Kg-dry	44.55	10/10/2014 12:36 PM	R52368
Ethylbenzene	ND	0.0564		mg/Kg-dry	44.55	10/10/2014 12:36 PM	R52368
m,p-Xylene	ND	0.113		mg/Kg-dry	44.55	10/10/2014 12:36 PM	R52368
Methyl tert-butyl ether	ND	0.0564		mg/Kg-dry	44.55	10/10/2014 12:36 PM	R52368
o-Xylene	ND	0.0564		mg/Kg-dry	44.55	10/10/2014 12:36 PM	R52368
Total Xylenes	ND	0.113		mg/Kg-dry	44.55	10/10/2014 12:36 PM	R52368
Toluene	ND	0.0564		mg/Kg-dry	44.55	10/10/2014 12:36 PM	R52368
<u>Internal Quality Control Compounds</u>							
Surr: 4-Bromofluorobenzene	108	0		%REC	44.55	10/10/2014 12:36 PM	R52368
Surr: Dibromofluoromethane	99.5	0		%REC	44.55	10/10/2014 12:36 PM	R52368
Surr: Toluene-d8	101	0		%REC	44.55	10/10/2014 12:36 PM	R52368
PERCENT MOISTURE		Method: -D3216-2005				Analyst: erw	
Percent Moisture	21	1.0		wt%	1	10/7/2014 11:05 AM	R52221

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Client Sample ID: SB-3 (2.5)

Matrix: Soil

Lab ID: 1410259-013

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 13:50 PM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
VOLATILE ORGANIC COMPOUNDS		Method: -8260B-2, Dec-96		Analyst: ls			
Benzene	ND	0.0135		mg/Kg-dry	42.11	10/10/2014 1:13 PM	R52368
Ethylbenzene	ND	0.0541		mg/Kg-dry	42.11	10/10/2014 1:13 PM	R52368
m,p-Xylene	ND	0.108		mg/Kg-dry	42.11	10/10/2014 1:13 PM	R52368
Methyl tert-butyl ether	ND	0.0541		mg/Kg-dry	42.11	10/10/2014 1:13 PM	R52368
o-Xylene	ND	0.0541		mg/Kg-dry	42.11	10/10/2014 1:13 PM	R52368
Total Xylenes	ND	0.108		mg/Kg-dry	42.11	10/10/2014 1:13 PM	R52368
Toluene	ND	0.0541		mg/Kg-dry	42.11	10/10/2014 1:13 PM	R52368
<u>Internal Quality Control Compounds</u>							
Surr: 4-Bromofluorobenzene	106	0		%REC	42.11	10/10/2014 1:13 PM	R52368
Surr: Dibromofluoromethane	100	0		%REC	42.11	10/10/2014 1:13 PM	R52368
Surr: Toluene-d8	100	0		%REC	42.11	10/10/2014 1:13 PM	R52368
PERCENT MOISTURE		Method: -D2216-2005		Analyst: erw			
Percent Moisture	22	1.0		wt%	1	10/7/2014 11:05 AM	R52221

Client Sample ID: SB-3 (7.5)

Matrix: Soil

Lab ID: 1410259-014

Date Received: 10/7/2014 9:21 AM

Collection Date: 10/1/2014 13:55 PM

Parameter	Result	Report Limit	Qual	Units	DF	Date Analyzed	BatchID
VOLATILE ORGANIC COMPOUNDS		Method: -8260B-2, Dec-96		Analyst: ls			
Benzene	ND	0.0136		mg/Kg-dry	44.22	10/10/2014 1:51 PM	R52368
Ethylbenzene	ND	0.0544		mg/Kg-dry	44.22	10/10/2014 1:51 PM	R52368
m,p-Xylene	ND	0.109		mg/Kg-dry	44.22	10/10/2014 1:51 PM	R52368
Methyl tert-butyl ether	ND	0.0544		mg/Kg-dry	44.22	10/10/2014 1:51 PM	R52368
o-Xylene	ND	0.0544		mg/Kg-dry	44.22	10/10/2014 1:51 PM	R52368
Total Xylenes	ND	0.109		mg/Kg-dry	44.22	10/10/2014 1:51 PM	R52368
Toluene	ND	0.0544		mg/Kg-dry	44.22	10/10/2014 1:51 PM	R52368
<u>Internal Quality Control Compounds</u>							
Surr: 4-Bromofluorobenzene	106	0		%REC	44.22	10/10/2014 1:51 PM	R52368
Surr: Dibromofluoromethane	102	0		%REC	44.22	10/10/2014 1:51 PM	R52368
Surr: Toluene-d8	102	0		%REC	44.22	10/10/2014 1:51 PM	R52368
PERCENT MOISTURE		Method: -D2216-2005		Analyst: erw			
Percent Moisture	19	1.0		wt%	1	10/7/2014 11:05 AM	R52221

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 Page 10 of 15

SUBURBAN LABORATORIES, Inc.

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Prep Dates

Report Date: October 14, 2014

Workorder: 1410259

Client: CWM Company, Inc

Project: Aman Food and Gas

Sample ID	Client Sample ID	Collection Date	Prep Batch	Prep Test Name	Leachate Date	Prep Date
1410259-001A	MW-1 (2.5)	10/1/2014 9:35 AM				
1410259-001B	MW-1 (2.5)	10/1/2014 9:35 AM				
1410259-002A	MW-1 (7.5)	10/1/2014 9:40 AM				
1410259-002B	MW-1 (7.5)	10/1/2014 9:40 AM				
1410259-003A	MW-2 (2.5)	10/1/2014 10:20 AM				
1410259-003B	MW-2 (2.5)	10/1/2014 10:20 AM				
1410259-004A	MW-2 (7.5)	10/1/2014 10:25 AM				
1410259-004B	MW-2 (7.5)	10/1/2014 10:25 AM				
1410259-005A	MW-3 (2.5)	10/1/2014 11:05 AM				
1410259-005B	MW-3 (2.5)	10/1/2014 11:05 AM				
1410259-006A	MW-3 (7.5)	10/1/2014 11:10 AM				
1410259-006B	MW-3 (7.5)	10/1/2014 11:10 AM				
1410259-007A	MW-4 (2.5)	10/1/2014 11:50 AM				
1410259-007B	MW-4 (2.5)	10/1/2014 11:50 AM				
1410259-008A	MW-4 (7.5)	10/1/2014 11:55 AM				
1410259-008B	MW-4 (7.5)	10/1/2014 11:55 AM				
1410259-009A	SB-1 (2.5)	10/1/2014 1:20 PM				
1410259-009B	SB-1 (2.5)	10/1/2014 1:20 PM				
1410259-010A	SB-1 (7.5)	10/1/2014 1:25 PM				
1410259-010B	SB-1 (7.5)	10/1/2014 1:25 PM				

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SUBURBAN LABORATORIES, Inc.

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



Prep Dates

Client: CWM Company, Inc

Report Date: October 14,
2014

Project: Aman Food and Gas

Workorder: 1410259

Sample ID	Client Sample ID	Collection Date	Prep Batch	Prep Test Name	Leachate Date	Prep Date
1410259-011A	SB-2 (2.5)	10/1/2014 1:35 PM				
1410259-011B	SB-2 (2.5)	10/1/2014 1:35 PM				
1410259-012A	SB-2 (7.5)	10/1/2014 1:40 PM				
1410259-012B	SB-2 (7.5)	10/1/2014 1:40 PM				
1410259-013A	SB-3 (2.5)	10/1/2014 1:50 PM				
1410259-013B	SB-3 (2.5)	10/1/2014 1:50 PM				
1410259-014A	SB-3 (7.5)	10/1/2014 1:55 PM				
1410259-014B	SB-3 (7.5)	10/1/2014 1:55 PM				

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Qualifier Definitions

Report Date: October 14, 2014

WorkOrder: 1410259

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- B Analyte detected in the associated Method Blank
- c Analyte not in SLI scope of accreditation
- C Value is below Minimum Compound Limit.
- 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 compound
- ND Not Detected at the Reporting Limit
- P Present
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

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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 # 113432	
Company Name: CWM Company, Inc. Company Address: 701 W. South Grand City: Springfield State: IL Zip: 62074 Phone: 217 522 8001 Fax: 217 522 8069 <input type="checkbox"/> Fax Report Email Address: CWM@cwcompany.com Final Report will be emailed Project ID / Location: Aman Food & Gas Project Manager (Report to): CAROL ROWE Sample Collector(s) Name: MDR/MIS		TURNAROUND TIME REQUESTED <input checked="" type="checkbox"/> Normal <input type="checkbox"/> 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: <input type="checkbox"/> None/Info Only (Required) <input checked="" type="checkbox"/> LUST <input type="checkbox"/> SRP <input type="checkbox"/> SDWA <input type="checkbox"/> 503 Sludge <input type="checkbox"/> NPDES <input type="checkbox"/> MWRDGC <input type="checkbox"/> Disposal <input type="checkbox"/> Other* *Please specify in comment section below.	
		ANALYSIS & METHOD REQUESTED Enter an "X" in box below for request	
		Page 1 of 2 PO No. _____ Shipping Method _____ Reporting Level (at additional charge) 1 2 3 4 LAB USE ONLY SI ORDER No. 1410259 Sample containers supplied by customer? <input type="checkbox"/> Yes Temperature of Received Samples 2 °C Samples received the same day as collection? <input type="checkbox"/> Yes R- Condition Split LAB #	
SAMPLE IDENTIFICATION *Use One Line Per Preservation & Container Type*			
	COLLECTION DATE TIME	GRAB/COMP. MATRIX	CONTAINERS Qty. SIZE & TYPE PRESERVATIVE
1	MW-1 2.5	10/1/14 935	S G 1/1 40mL/4oz MeOH/None
2	MW-1 7.5	1/1 940	↓ ↓ ↓ ↓ ↓
3	MW-2 2.5	1/1 1020	↓ ↓ ↓ ↓ ↓
4	MW-2 7.5	1/1 1025	↓ ↓ ↓ ↓ ↓
5	MW-3 2.5	1/1 1105	↓ ↓ ↓ ↓ ↓
6	MW-3 7.5	1/1 1110	↓ ↓ ↓ ↓ ↓
7	MW-4 2.5	1/1 1150	↓ ↓ ↓ ↓ ↓
8	MW-4 7.5	1/1 1155	↓ ↓ ↓ ↓ ↓
9	SB-1 2.5	1/1 120	↓ ↓ ↓ ↓ ↓
10	SB-1 7.5	1/1 125	↓ ↓ ↓ ↓ ↓
11	SB-2 2.5	1/1 135	↓ ↓ ↓ ↓ ↓
12	SB-2 7.5	1/1 140	↓ ↓ ↓ ↓ ↓
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 ₂ SO ₄ , HCl, HNO ₃ , Methanol (MeOH), NaOH, Sodium Bisulfate (NaB), NaThio		COMMENTS & SPECIAL INSTRUCTIONS: 2014-2015 Rates	
		RECEIVED OCT 14 2014 BY: 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 CDC	
1. Relinquished By:	Date: 10-6-14	2. Relinquished By: Andy Gueff	Date: 10-7-14
Received By: Andy Gueff <input checked="" type="checkbox"/> Ico present	Time: 2:00 PM	Received By: K. Williams <input checked="" type="checkbox"/> Ico present	Time: 9:21 AM
Submission of samples subject to Terms and Conditions on back.		Rev. 07/20/08	

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 # 113433																																																																																																																																																													
Company Name: <u>CWM Company, Inc.</u> Company Address: <u>701 W. South Grand Ave</u> City: <u>Springfield</u> State: <u>IL</u> Zip: <u>62704</u> Phone: <u>217-522-8001</u> Fax: <u>217-522-8009</u> <input type="checkbox"/> Fax Report Email Address: <u>CWM@CWMCompany.com</u> Final Report will be emailed <input type="checkbox"/> Project ID / Location: <u>Aman Food & Gas</u> Project Manager (Report to): <u>Carol Rowe</u> Sample Collector(s) Name: <u>MOR/MOS</u>		TURNAROUND TIME REQUESTED <input checked="" type="checkbox"/> Normal <input type="checkbox"/> 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: <input type="checkbox"/> None/Info Only (Required) <input checked="" type="checkbox"/> LUST <input type="checkbox"/> SRP <input type="checkbox"/> SDWA <input type="checkbox"/> 503 Sludge <input type="checkbox"/> NPDES <input type="checkbox"/> MWRDGC <input type="checkbox"/> Disposal <input type="checkbox"/> Other* *Please specify in comment section below.																																																																																																																																																													
ANALYSIS & METHOD REQUESTED Enter an "X" in box below for request		Page <u>2</u> of <u>2</u> PO No. _____ Shipping Method _____ Reporting Level (at additional charge) 1 2 3 4 LAB USE ONLY SLI ORDER No. <u>1410259</u> Sample containers supplied by customer? <input type="checkbox"/> Yes Temperature of Received Samples <u>2</u> °C Samples received the same day as collection? <input type="checkbox"/> Yes																																																																																																																																																													
SAMPLE IDENTIFICATION *Use One Line Per Preservation & Container Type*		COLLECTION DATE TIME MATRIX GRAB/COMP. CONTAINERS PRESERVATIVE																																																																																																																																																													
<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> <th>7</th> <th>8</th> <th>9</th> <th>10</th> <th>11</th> <th>12</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SB-3</td> <td>2.5</td> <td>10/11/14</td> <td>150</td> <td>S</td> <td>G</td> <td>1/1</td> <td>40ml/4oz</td> <td>MeOH/None</td> <td>X</td> <td></td> </tr> <tr> <td>2</td> <td>SB-3</td> <td>7.5</td> <td>10/11/14</td> <td>155</td> <td>S</td> <td>G</td> <td>1/1</td> <td>40ml/4oz</td> <td>MeOH/None</td> <td>X</td> <td></td> </tr> <tr> <td>3</td> <td></td> </tr> <tr> <td>4</td> <td></td> </tr> <tr> <td>5</td> <td></td> </tr> <tr> <td>6</td> <td></td> </tr> <tr> <td>7</td> <td></td> </tr> <tr> <td>8</td> <td></td> </tr> <tr> <td>9</td> <td></td> </tr> <tr> <td>10</td> <td></td> </tr> <tr> <td>11</td> <td></td> </tr> <tr> <td>12</td> <td></td> </tr> </tbody> </table>		1	2	3	4	5	6	7	8	9	10	11	12	1	SB-3	2.5	10/11/14	150	S	G	1/1	40ml/4oz	MeOH/None	X		2	SB-3	7.5	10/11/14	155	S	G	1/1	40ml/4oz	MeOH/None	X		3												4												5												6												7												8												9												10												11												12												R- Condition Split LAB # D3A/B D4A/B	
1	2	3	4	5	6	7	8	9	10	11	12																																																																																																																																																				
1	SB-3	2.5	10/11/14	150	S	G	1/1	40ml/4oz	MeOH/None	X																																																																																																																																																					
2	SB-3	7.5	10/11/14	155	S	G	1/1	40ml/4oz	MeOH/None	X																																																																																																																																																					
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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 ₂ SO ₄ , HCl, HNO ₃ , Methanol (MeOH), NaOH, Sodium Bisulfate (NaBS), NaThio		COMMENTS & SPECIAL INSTRUCTIONS: <u>2014-15 Rates</u>																																																																																																																																																													
1. Relinquished By: <u>[Signature]</u> Date: <u>10-6-14</u>		2. Relinquished By: <u>[Signature]</u> Date: <u>10-7-14</u>																																																																																																																																																													
Received By: <u>[Signature]</u> Time: <u>2:00 PM</u> <input checked="" type="checkbox"/> Ice present		Received By: <u>[Signature]</u> Time: <u>9:21 AM</u> <input type="checkbox"/> Ice present																																																																																																																																																													
Submission of samples subject to Terms and Conditions on back.		Rev. 07/20/08																																																																																																																																																													

RECEIVED
 OCT 14 2014
 BY: Ca



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

RECEIVED
OCT 20 2014
BY: Ch

A. Site Identification

IEMA Incident # (6- or 8-digit): 14-0247 IEPA LPC# (10-digit): _____
Site Name: AMAN FOOD & GAS
Site Address (Not a P.O. Box): 1830 5th Avenue
City: Moline County: Rock Island ZIP Code: _____
Leaking UST Technical File

B. Sample Collector

I certify that:

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

MR
(Initial)
KR
(Initial)
ML
(Initial)
MR
(Initial)

C. Laboratory Representative

I certify that:

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

DA
(Initial)
DA
(Initial)
DA
(Initial)
DA
(Initial)
DA
(Initial)

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

(Initial)

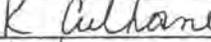
D. Signatures

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 Matthew Rives
Title Engineer
Company CWM Company, Inc.
Address 701 South Grand Ave. West
City Springfield
State IL
Zip Code 62704
Phone 217-522-8001
Signature 
Date 10-1-14

Laboratory Representative

Name Kelly Culhane
Title Project Manager
Company Suburban Laboratories, Inc.
Address ~~414-Litt Drive~~ 1950 S. Batavia Ave. Ste 150
City Hillside Geneva
State IL
Zip Code ~~62764~~ 60134
Phone 708-544-3260
Signature 
Date 10/14/14

RECEIVED
OCT 20 2014
BY: CR

SUBURBAN LABORATORIES, Inc.



INVOICE
FEIN # 36-2695636

1950 S. Batavia Ave., Suite 150, Geneva, IL 60134
Tel (708) 544-3260 Toll Free (800) 783-5227
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#: 118755
Date: 12/22/2014
Terms: NET90
Invoice Due: 3/22/2015

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

PO:
Report To: Carol Rowe
Fax: (217) 522-8009
Project: Aman Food and Gas
Priority: Priority: Rush

Workorder: 1412869

Item Description	Matrix	Remarks	Qty	Unit Price	Total
BTEX + MTBE Water	Groundwater	July 2014 - June 2015	5	\$98.41	\$492.05

Item	Unit	Qty	Total
5035 Sampling Kit	\$12.15	0	\$0.00
Shipping & Handling	\$60.74	1	\$60.74

Sub Total: \$492.05
Misc. Charges: \$60.74
Surcharges: 0 %
INVOICE Total: \$552.79
Pre-Paid Amount: \$0.00
Total Payable Amount: \$552.79

Comments: Terms per signed agreement

DEC 22 2014
CR



SUBURBAN LABORATORIES, Inc.



1950 S. Batavia Ave., Suite 150, Geneva, IL 60134
Tel (708) 544-3260 Toll Free (800) 783-5227
Fax (708) 544-8587
www.suburbanlabs.com

December 22, 2014

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

Work Order: 1412869

TEL: (217) 522-8001
FAX: (217) 522-8009
RE: Aman Food and Gas

DEC 22 2014
CR

Dear Carol Rowe:

Suburban Laboratories, Inc. received 5 sample(s) on 12/16/2014 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 including, 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

Illinois Department of Public Health #17585



Illinois EPA #100225 Wisconsin FID# 399089350

Rpt Ver: 12/22/2014 10:37 AM

SUBURBAN LABORATORIES, Inc.

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



Case Narrative

Client: CWM INC

Date: December 22, 2014

Project: Aman Food and Gas

PO:

WorkOrder: 1412869

QC Level:

Temperature of samples upon receipt at lab: 5 C

Chain of Custody: 113487

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.
- All water analyses that are required to be performed in the field (e.g., pH, residual chlorine, sulfite, temperature, etc.) but are analyzed in the lab are identified as "in lab" and are considered past holding time. Following industry practices these results do not contain an "H" flag but are qualified as being analyzed in the lab.

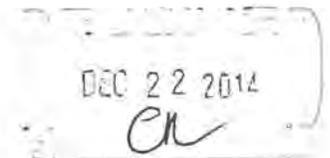
Abbreviations:

- 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
- 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:

Rpt Ver: 12/22/2014 10:37 AM

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

CR
(Initial)
CR
(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 Oshalt
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 12-11-14

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 Kelly Culhane
Date 12/23/14

11-3-2015
CR

LEAKING UST TECHNICAL REVIEW NOTES

Reviewed by: Eric Kuhlman

Re: LPC #1610455194 – Rock Island County
Moline / Aman Food & Gas
1830 5th Avenue
Leaking UST Incident No. #20140247
Leaking UST Technical File

Date Reviewed: 10-30-2015

Document(s) Reviewed:

S2 SIP / S1 AC / S2 BUD

General Site Information:

Site subject to: 734

IEMA date(s): 3-3-2014	Payment from the Fund? (Y/N/unknown): U
UST system removed? (Y/N): N	OSFM Fac. ID #: 3-008580
Encountered groundwater? (Y/N/U): Y	SWAP mapping and evaluation completion date: 8-28-2014
Free product? (Y/N/unknown): N	Site placement correct in SWAP? (Y/N): Y
Current/past land use: convenience store	MTBE > 40 ppb in groundwater? (Y/N/U): U
Size & product of USTs: (1) 5,000 gallon gasoline, (1) 3,000 gallon gasoline, (1) 4,000 gallon gasoline,	
Is site located in EJ area? N	Is investigation of indoor inhalation exposure route required? N

BOL File Information:(optional) (Arranged chronologically):

On 3-3-2014, two (2) waste characterization borings {**WC-1, WC-2**} were advanced to depths of 10 feet below ground surface (bgs). Soil samples were collected and analyzed for BETX/MTBE. Analytical results indicated COCs greater than Tier I SROs for **Csat** in WC-1(X); **CW Inh** in WC-1(BETX), WC-2(X); **RIinh** in WC-1(BX); **SCGW** in WC-1(BETX), WC-2(B).

According to ISGS, ISWS, and Illinois EPA PWS, there are ten (10) wells located within 2,500 feet of the site. The ISGS Circular 532, also known as the "Berg Circular" indicates this site is located within an area classified as "C5", a predominantly till with discontinuous sand and gravel locally present within fifty feet of the surface. There is also a city-wide groundwater ordinance for the city of Moline.

On 5-1-2014, three (3) underground storage tanks (USTs) and associated piping were removed from this site. Approximately 771 tons (514 cubic yards) of contaminated backfill was excavated from the former tank pit and disposed of offsite. Soil samples were collected from excavation walls, floors and piping trench, then analyzed for BETX/MTBE. Analytical results indicated COCs greater than Tier I ROs for **RIng** in 8(B); **CW Inh** in 1(B), 2(X), 3(BX), 4(X), 7(X), 8(BTX), 9(X), 13(X), 15(X); **RIinh** in 2(B), 3(B), 4(B), 8(B), 13(B); **SCGW** in 1(B), 2(B), 4(BE), 5(B), 6(B), 7(B), 8(BETX), 9(B), 10(B), 13(B), 14(B), 16(B), 17(B).

Page 2

On 10-1-2014, four (5) monitoring wells {**MW-1 thru MW-5**} were installed to depths of 15 feet below ground surface (bgs) and three (3) soil borings {**SB-1 thru SB-3**} were advanced to depths of 10 feet bgs. Soil samples were collected at 2.5 feet and 7.5 feet bgs, then analyzed for BETX/MTBE. Analytical results indicated COCs below detectable limits (BDLs).

On 12-11-2014, groundwater samples were collected from MW-1 thru MW-5 and analyzed for BETX/MTBE. Analytical results indicated COCs were greater than Tier I GROs for **Class I** in MW-3(B).

Site Classification Work Plan/Budget Review Notes:

CWM proposed to a total of two (2) groundwater monitoring wells and two (2) soil borings to determine the horizontal and vertical extent of the onsite contamination. Soil samples will be collected and analyzed for BETX/MTBE; however, one soil boring will only be analyzed for the site-specific TACO parameters.

A slug test will also be performed to determine the hydraulic conductivity and hydraulic gradient.

Illinois EPA Recommendation/Comments:

The PM recommends that the S2 SIP be modified, while the S1 AC and S2 BUD be approved...

Response Due:

8-30-2014

EK:P\



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

NOV 05 2015

7012 0470 0001 2970 7957

Aman Food & Gas
Attention: Balbir Kaur
5048 Country Court
Davenport, Iowa 52807

**EPA-DIVISION OF SOLID WASTE MANAGEMENT
RELEASABLE**

NOV 17 2015

Re: LPC #1610455194 – Rock Island County
Moline / Aman Food & Gas
1830 5th Avenue
Leaking UST Incident No. #20140247
Leaking UST Technical File

REVIEWER RDH

Dear Mr. Kaur:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the Stage 2 Site Investigation Plan (plan) submitted for the above-referenced incident. This plan, dated July 22, 2015, was received by the Illinois EPA on July 23, 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 requires modification of the plan; therefore, the plan is conditionally approved with the Illinois EPA's modifications. The Illinois EPA has determined that the modifications listed in Attachment A are 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)).

The actual costs for Stage 1 are approved for the amounts listed in Section 1 of Attachment B (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.

In addition, the proposed budget for Stage(s) 2 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)).

Page 2

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. This notification of field activities may be done by telephone, facsimile, or electronic mail—and must be provided at least three (3) working days prior to the scheduled field activities.

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 Stage 3 Site Investigation Plan, and budget if applicable, or 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 the Illinois EPA project manager, Eric Kuhlman, at 217-785-5715.

Page 3

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Henninger', with a long horizontal flourish extending to the right.

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

TAH:EK:P\

Attachment: A, B, Appeal Rights

c: CWM Company
BOL File

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:

John Therriault, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson 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

Attachment A

Re: LPC #1610455194 – Rock Island County
Moline / Aman Food & Gas
1830 5th Avenue
Leaking UST Incident No. #20140247
Leaking UST Technical File

Citations in this attachment are from the Environmental Protection Act (415 ILCS 5) (Act) and Title 35 of the Illinois Administrative Code (35 Ill. Adm. Code).

1. The Stage 2 site investigation must be designed to complete the identification of the extent of soil and groundwater contamination at the site that, as a result of the release, exceeds the most stringent Tier 1 remediation objectives of 35 Ill. Adm. Code 742 for the applicable indicator contaminants. The investigation of any off-site contamination must be conducted as part of the Stage 3 site investigation. (Section 57.1(a) of the Act and 35 Ill. Adm. Code 734.320)

The additional soil boring proposed for collection of the TACO sample should be moved further away from the former UST field, preferably somewhere in the southern portion of the subject property and not so close to the .

Note: The soil sample collected from the TACO boring should also be analyzed for BETX and MTBE to confirm that the soil sample collected is not within the horizontal and vertical extent of the soil contamination.

2. The Stage 2 site investigation must be designed to complete the identification of the extent of soil and groundwater contamination at the site that, as a result of the release, exceeds the most stringent Tier 1 remediation objectives of 35 Ill. Adm. Code 742 for the applicable indicator contaminants. The investigation of any off-site contamination must be conducted as part of the Stage 3 site investigation. (Section 57.1(a) of the Act and 35 Ill. Adm. Code 734.320)

The soil boring and monitoring wells proposed to determine the vertical and horizontal extent of the contamination onsite should be located as close to the property lines as humanly possible so that additional soil borings and monitoring wells are not required to determine the extent of the contamination onsite.

3. At a minimum, all site maps submitted to the Illinois EPA must meet the following requirements:
 - a. The maps must be of sufficient detail and accuracy to show required information;
 - b. The maps must contain the map scale, an arrow indicating north orientation, and the date the map was created; and

- c. The maps must show the following:
- i. The property boundary lines of the site, properties adjacent to the site, and other properties that are, or may be, adversely affected by the release;
 - ii. The uses of the site, properties adjacent to the site, and other properties that are, or may be, adversely affected by the release;
 - iii. The locations of all current and former USTs at the site, and the contents of each UST; and
 - iv. All structures, other improvements, and other features at the site, properties adjacent to the site, and other properties that are, or may be, adversely affected by the release, including but not limited to buildings, pump islands, canopies, roadways and other paved areas, utilities, easements, rights-of-way, and actual or potential natural or man-made pathways.

(Section 57.1(a) of the Act and 35 Ill. Adm. Code 734.440)

All the site maps submitted to the Agency do not meet the requirements of 35 Ill. Adm. Code 734.440, since these maps do not show the following requirements:

- i. **The map scale is listed in the title block but not shown on the site map. The map scale needs to be drawn somewhere on the site map so that if the map is reduced or enlarged the scale of the map can be determined,**
- ii. **There are two arrows north orientation, assumed north and true north but only the true north orientations should be drawn on these site maps,**
- iii. **The property lines of the subject property are not completely drawn along 5th Avenue, the southwestern adjacent property along 5th Avenue, or the southeastern adjacent property along 19th Street.**

These site maps need to be corrected and submitted to the Agency for review.

4. The Stage 2 site investigation plan must include, but not be limited to, the results of the Stage 1 site investigation, including but not limited to the following:
- a. One or more site maps meeting the requirements of 35 Ill. Adm. Code 734.440 that show the locations of all borings and groundwater monitoring wells completed to date, and the groundwater flow direction.
 - b. One or more site maps meeting the requirements of 35 Ill. Adm. Code 734.440 that show the locations of all samples collected to date and analyzed for the applicable indicator contaminants.

- c. One or more site maps meeting the requirements of 35 Ill. Adm. Code 734.440 that show the extent of soil and groundwater contamination at the site that exceeds the most stringent Tier 1 remediation objectives of 35 Ill. Adm. Code 742 for the applicable indicator contaminants.
- d. One or more cross-sections of the site that show the geology of the site and the horizontal and vertical extent of soil and groundwater contamination at the site that exceeds the most stringent Tier 1 remediation objectives of 35 Ill. Adm. Code 742 for the applicable indicator contaminants.
- e. Analytical results, chain of custody forms, and laboratory certifications for all samples analyzed for the applicable indicator contaminants as part of the Stage 1 site investigation.
- f. One or more tables comparing the analytical results of the samples collected to date to the most stringent Tier 1 remediation objectives of 35 Ill. Adm. Code 742 for the applicable indicator contaminants.
- g. Water supply well survey documentation required pursuant to 35 Ill. Adm. Code 734.445(d) for water supply well survey activities conducted as part of the Stage 1 site investigation.
- h. For soil borings and groundwater monitoring wells installed as part of the Stage 1 site investigation, soil boring logs and monitoring well construction diagrams meeting the requirements of 35 Ill. Adm. Code 734.425 and 734.430.

(Section 57.1(a) of the Act and 35 Ill. Adm. Code 734.320(b)(3))

The Stage 2 site investigation plan did not include one or more cross-sections of the site showing the site geology and the horizontal and vertical extent of the soil and groundwater contamination beneath the site that exceeds the most stringent Tier 1 remediation objectives of 35 IAC 742 for the applicable indicator contaminants.

These cross-sectional site maps need to be submitted to the Agency for review.

- 5. The Stage 2 site investigation plan must include, but not be limited to, the results of the Stage 1 site investigation, including but not limited to the following:
 - a. One or more site maps meeting the requirements of 35 Ill. Adm. Code 734.440 that show the locations of all borings and groundwater monitoring wells completed to date, and the groundwater flow direction.
 - b. One or more site maps meeting the requirements of 35 Ill. Adm. Code 734.440 that show the locations of all samples collected to date and analyzed for the applicable indicator contaminants.

- c. One or more site maps meeting the requirements of 35 Ill. Adm. Code 734.440 that show the extent of soil and groundwater contamination at the site that exceeds the most stringent Tier I remediation objectives of 35 Ill. Adm. Code 742 for the applicable indicator contaminants.
- d. One or more cross-sections of the site that show the geology of the site and the horizontal and vertical extent of soil and groundwater contamination at the site that exceeds the most stringent Tier I remediation objectives of 35 Ill. Adm. Code 742 for the applicable indicator contaminants.
- e. Analytical results, chain of custody forms, and laboratory certifications for all samples analyzed for the applicable indicator contaminants as part of the Stage I site investigation.
- f. One or more tables comparing the analytical results of the samples collected to date to the most stringent Tier I remediation objectives of 35 Ill. Adm. Code 742 for the applicable indicator contaminants.
- g. Water supply well survey documentation required pursuant to 35 Ill. Adm. Code 734.445(d) for water supply well survey activities conducted as part of the Stage I site investigation.
- h. For soil borings and groundwater monitoring wells installed as part of the Stage I site investigation, soil boring logs and monitoring well construction diagrams meeting the requirements of 35 Ill. Adm. Code 734.425 and 734.430.

(Section 57.1(a) of the Act and 35 Ill. Adm. Code 734.320(b)(3))

One or more tables comparing the analytical results of the early action samples collected on May 5, 2014 to the most stringent Tier I remediation objectives of 35 IAC 742 for the applicable indicator contaminants do not show the approximate depth that these early action excavation samples were collected.

These tables need to be corrected and submitted to the Agency for review.

EK:P

Attachment B

Re: LPC #1610455194 – Rock Island County
Moline / Aman Food & Gas
1830 5th Avenue
Leaking UST Incident No. #20140247
Leaking UST Technical File

SECTION 1

STAGE 1 Actual Costs

The following amounts are approved:

\$4,255.35	Drilling and Monitoring Well Costs
\$2,229.27	Analytical Costs
\$607.46	Remediation and Disposal Costs
\$0.00	UST Removal and Abandonment Costs
\$0.00	Paving, Demolition, and Well Abandonment Costs
\$16,224.32	Consulting Personnel Costs
\$953.00	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.

STAGE 2 Proposed Budget

Costs must be incurred in accordance with the approved plan and must be determined in accordance with 35 Ill. Adm. Code 734.Subpart H, Appendix D, and Appendix E.

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.

EK:PV

CW³M Company
Environmental Consulting Services

701 W. South Grand Avenue
Springfield, IL 62704

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

July 28, 2016

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

1610455194 – Rock Island County
Aman Food and Gas
Incident # 20140247
Leaking UST Technical File

RE: **LPC #1610455194 –Rock Island County**
Aman Food & Gas
1830 5th Avenue
Incident Number: 2014-0247
LUST Technical Reports—Stage 3 Site Investigation Plan and Budget

COPY

Dear Mr. Kuhlman,

On behalf of Aman Food & Gas, owner of the USTs at the above-referenced site, we are submitting the attached Stage 3 Site Investigation Plan and Budget. This includes the results of the Stage 2 investigation as well as a summary of the costs.

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 2013-0876, 2014-1417, 2014-0944, 2014-0673, 2014-1190, 2013-0198, 2015-0158, 2014-0510, 2012-0515, 2013-0906, 2014-0556, 2015-0257, 2011-0837, 2011-0822, 2011-0516, 2012-0575, 2009-0929, 2009-0948, 2009-1410, and 2007-0082. 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, Section 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.

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In addition, we have had prior discussions with managers and project managers 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 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 the Agency's technical personnel or project should well know, there are many technical and regulatory components to the reimbursement side of the equation. It is not all just accounting. Currently, the Agency has technical staff conduct the review of any claim that is not simplistic or requires decision making and judgment versus just checking for accounting errors, line items, and that totals not in an excess of their budgeted approval totals. The project managers also assist with reviews to prevent a backlog, while conducting work reviewing claims. These project managers do not change their titles or billing codes (i.e. - their take home pay is not decreased). Their expertise of the program is valued and their pay is left therefore intact. The merit of their technical input is valuable as is the technical input into the development of the claims by consultants as well, if not more so. Consultants are actually putting together all the pieces and preparing the claim as opposed to reviewing it.

Cutting the rate of a title in the budget is the same as cutting personnel pay and is beyond the purpose of the personnel descriptions. It violates the Professional Engineer and Professional Geologist Acts as well. Technically, the Professional Engineer should never change his or her rate and should be billed at that rate regardless of what they do; they are functioning at that capacity at all times oversighting, asking questions, modifying drilling plans, and developing less experienced engineer/geologists, for example.

As a solid group of personnel gain experience and seniority and no new positions need filling, those present take on all roles and do whatever is needed to get the job done. An Environmental Protection Specialist (EPS) III who may have performed the work of an EPS I or an Account Technician I-IV does not suddenly get a pay cut. However, once the Agency starts assigning titles because they do not like the rate, they try to force fit a new job title that may or may not fit that person's real title and work (perhaps one title in a budget) in their company. Forcing rates forces pay cuts. If the rates of titles assigned by companies are not obtained, that person cannot be paid at their full rate of compensation.

We use the comparison to the Agency only to attempt to explain the situation in a way that might show the net effect of altering titles and rates. While the dollar amount in one budget may be seemingly small, even to us, the net effect over a year means so much more. That hourly rate must pay not only that person, but collectively aid costs and overhead of the business: rent, utilities, multiple forms of insurance (liability, workers, compensation, pollution liability, health insurance umbrella, fiduciary), accountants, attorneys, business licenses, state licenses, computers, office supplies,

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copies – the list is endless). The hourly rate of billable personnel pays for personnel conducting non-billable work, such as paying bills, data entry for invoicing, staff meetings, business development, etc. Again, like the Agency, who has personnel dedicated to special tasks, and projects, ongoing reports to address regulations or policy changes, reports to USEPA, the Director and Governor's Office, etc. While our worlds seem polar and miles apart, the function of staff is similar; again why we attempted to use an example. The one difference is that the private sector has to be profitable. The Agency has to be accountable and achieve goals.

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. Matt Rives or me at (217) 522-8001.

Sincerely,



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

xc: Mrs. Balbir Kaur & Mr. Jeet Singh, *Aman Food & Gas*
Mr. William T. Sinnott, *CW²M Company, Inc.*

APPENDIX A

SITE INVESTIGATION PLAN FORM

STAGE 3 SITE INVESTIGATION PLAN AND BUDGET AMAN FOOD & GAS MOLINE, ILLINOIS



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 Site Investigation Plan

A. Site Identification

IEMA Incident # (6- or 8- digit): 2014-0247 IEPA LPC # (10- digit): 1610455194

Site Name: Aman Food & Gas

Site Address (not a P.O. Box): 1830 5th Avenue

City: Moline County: Rock Island Zip Code: 61265

Leaking UST Technical File _____

B. Site Information

1. Will the owner or operator seek payment from the Underground Storage Tank Fund? Yes No

2. If yes, is the budget attached? Yes No

C. Site Investigation

Provide the following:

1. Stage of investigation

a. Stage 2

b. Stage 3

2. Summary of Stage 1 or 2 site investigation activities;

3. Characterization of site and surrounding area:

a. Current and projected post-remediation uses;

b. Physical setting:

i. Environmental conditions;

ii. Geologic, hydrogeologic, and hydrologic conditions; and

iii. Geographic and topographic conditions;

4. Results of Stage 1 or 2 site investigation:

a. Map(s) showing locations of all borings and groundwater monitoring wells completed to date and groundwater flow direction;

b. Map(s) showing locations of all samples collected;

c. Map(s) showing extents of soil and groundwater contamination that exceeds the most stringent Tier 1 remediation objectives;

d. Cross-section(s) showing the geology and the horizontal and vertical extents of soil and groundwater contamination that exceeds the most stringent Tier 1 remediation objectives;

e. Analytical results, chain of custody forms, and laboratory certifications;

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- f. Table(s) comparing analytical results to the most stringent Tier 1 remediation objectives (include sample depth, date collected, and detection limits);
 - g. Potable water supply well survey (unless provided in previous plan):
 - i. Map(s) to scale showing:
 - a) Locations of community water supply wells and other potable wells and the setback zone for each well;
 - b) Location and extent of regulated recharge areas and wellhead protection areas;
 - c) Extent of groundwater contamination exceeding the most stringent Tier 1 remediation objectives; and
 - d) Modeled extent of groundwater contamination exceeding the most stringent Tier 1 remediation objectives (if performed as part of site investigation);
 - ii. Table(s) listing the setback zones for each community water supply well and other potable water supply wells;
 - iii. A narrative identifying each entity contacted to identify potable water supply wells, the name and title of each person contacted, and any field observations associated with any wells identified; and
 - iv. A certification from a Licensed Professional Engineer or Licensed Professional Geologist that the survey was conducted in accordance with the requirements and that documentation submitted includes information obtained as a result of the survey;
 - h. Soil boring logs and monitoring well construction diagrams;
 - i. Proposal for determining the following parameters:
 - i. Hydraulic conductivity (K);
 - ii. Soil bulk density (ρ_b);
 - iii. Soil particle density (ρ_s);
 - iv. Moisture content (w); and
 - v. Organic carbon content (f_{oc}); and
 - j. Budget forms of actual costs (documenting actual work performed during the previous stage).
5. Stage 2 or 3 sampling plan:
- a. Description of and justification for additional activities proposed as part of the plan;
 - b. A map depicting locations of proposed borings and groundwater monitoring wells; and
 - c. Depth of borings/wells and construction details of proposed borings and wells; and
6. Site maps meeting the requirements of 35 Ill. Adm. Code 734.440.

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: Aman Food & Gas
Contact: Balbir Kaur
Address: 5048 Country Court
City: Davenport
State: IA
Zip Code: 61265
Phone: 563-275-8189
Signature: BALBIR KAUR
Date: 7-20-16

Consultant

Company: CWM Company
Contact: Carol L. Rowe
Address: 701 South Grand Avenue West
City: Springfield
State: IL
Zip Code: 62704
Phone: 217-522-8001
Signature: [Handwritten Signature]
Date: 7/22/2016

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].

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Licensed Professional Engineer or Geologist

Name: Vince E. Smith
Company: CWM Company
Address: 701 South Grand Avenue West
City: Springfield
State: IL
Zip Code: 62704
Phone: 217-522-8001
Ill. Registration No.: 062-046118
License Expiration Date: 11/30/17
Signature: [Handwritten Signature]
Date: 7/22/16

L.P.E. or L.P.G. Seal JUL 29 2016

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STAGE 3 SITE INVESTIGATION PLAN AND BUDGET

AMAN FOOD & GAS

**Moline, Illinois
LPC #1610455194 — Rock Island County
Incident Number 2014-0247**

Presented 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 Avenue
Springfield, Illinois
(217) 522-8001

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

JULY 2016

*CWM Company, Inc.
Stage 3 Site Investigation Plan and Budget
Aman Food & Gas
LPC #1610455194 Incident Number 2014-0247*

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*CW³M Company, Inc.
Stage 3 Site Investigation Plan and Budget
Aman Food & Gas
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ACRONYMS AND ABBREVIATIONS

BETX	Benzene, Ethylbenzene, Toluene, and Total Xylenes
CUOs	Clean-up Objectives
CW ³ M	CW ³ M Company, Inc.
IEMA	Illinois Emergency Management Agency
IEPA	Illinois Environmental Protection Agency
ILCS	Illinois Compiled Statutes
Ill. Adm. Code	Illinois Administrative Code
ISGS	Illinois State Geological Survey
ISWS	Illinois State Water Survey
mL	Milliliter
MTBE	Methyl Tert-Butyl Ether
OSFM	Office of the State Fire Marshal
PVC	Polyvinyl Chloride
TACO	Tiered Approach to Corrective Action Objectives
SICR	Site Investigation Completion Report
SIP	Site Investigation Plan
SWAP	Source Water Assessment Program
USTs	Underground Storage Tanks
WCRs	Well Completion Reports

*CW³M Company, Inc.
Stage 3 Site Investigation Plan and Budget
Aman Food & Gas
LPC #1610455194 Incident Number 2014-0247*

1. SITE HISTORY/EXECUTIVE SUMMARY

1.1 GENERAL

Mr. Jeet Singh, representing the owner of the underground storage tanks (USTs) at the Aman Food & Gas site in Moline, Illinois reported a release to the Illinois Emergency Management Agency (IEMA). Incident Number 2014-0247 was assigned to the notification on March 3, 2014. Mr. Singh and Ms. Balbir Kaur then requested CW³M Company, Inc. (CW³M) to proceed with the reporting and early action requirements in accordance with 35 Illinois Administrative Code (Ill. Adm. Code) § 734. This Stage 3 Site Investigation Plan (SIP) and Budget is being prepared in response to Incident Number 2014-0247.

The 20-Day Certification was submitted to the Illinois Environmental Protection Agency (IEPA) on March 7, 2014 (CW³M, 2014). In order to allow for the installation of new tanks which were going to be installed following UST removal, an extension of the 45-Day Reporting period was requested on April 17, 2014 (CW³M, 2014a), and approved by the IEPA on April 28, 2014 (IEPA, 2014). The 45-Day Report was submitted on May 2, 2014 (CW³M, 2014b) and approved on August 29, 2014 (IEPA, 2014a), with a 45-Day Report Addendum being submitted on June 2, 2014 (CW³M, 2014c). A Stage 2 SIP and Budget was submitted to the Agency on July 23, 2015 (CW³M, 2015) and was approved, with modifications, on November 5, 2015 (IEPA, 2015).

This Stage 3 SIP and Budget has been prepared by CW³M in accordance with the requirements of 35 Ill. Adm. Code 734. The Site Investigation Plan certification form, which has been prescribed and provided by the IEPA, has been included herein as Appendix A. The Stage 2 actual costs and the Stage 3 proposed budget 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 Aman Food & Gas, is located at 1830 5th Avenue, Moline, Rock Island County, Illinois 61265. The site is located in the SW $\frac{1}{4}$ of the SE $\frac{1}{4}$ of the NE $\frac{1}{4}$ of Section 32, Township 18 North of the Centralia Baseline and Range 1 West of the Fourth Principal Meridian.

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Stage 3 Site Investigation Plan and Budget
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1.3 UNDERGROUND STORAGE TANK INFORMATION

A permit for the removal of three USTs and product piping was approved by the Office of the State Fire Marshal (OSFM) on March 11, 2014 (OSFM, 2014). CW³M personnel were at the site to initiate tank removal activities starting Wednesday April 30, 2014. Due to scheduling conflicts trying to arrange the removal of the tanks to coincide with the installation of new tanks, CW³M was unable to complete the Early Action Requirements set forth in 35 Ill. Adm. Code 734 and Illinois Compiled Statutes (ILCS) 5/57-57.17 in the allotted 45-day time period. A request for an extension of time to complete these activities was sent to the IEPA April 17, 2014 (CW³M, 2014a) and approved by the IEPA on April 28, 2014 (IEPA, 2014).

CW³M personnel were at the site on April 30, 2014, to begin UST tank removal early action activities. OSFM Tank Specialist Jeffery Hindman and CW³M personnel were at the site to supervise the removal of the USTs on May 1, 2014. The tanks were ventilated and removed along with the product piping. As the OSFM Field Specialists have been instructed not to make the official determination of the release, the source of release was made in consult with the OSFM Field Specialist using the best professional judgment of field personnel of the tank, piping, and soil conditions.

Tank 1: This fiberglass tank was found to be in fair condition. The tank had no visible holes or pitting. OSFM Tank Specialist Hindman in conjunction with CW³M personnel determined that overfills and piping were contributing factors to the cause of the petroleum release.

Tank 2: This fiberglass tank was found to be in fair condition. The tank had no visible holes or pitting. OSFM Tank Specialist Hindman in conjunction with CW³M personnel determined that overfills and piping were contributing factors to the cause of the petroleum release.

Tank 3: This fiberglass tank was found to be in fair condition. The tank had no visible holes or pitting. OSFM Tank Specialist Hindman in conjunction with CW³M personnel determined that overfills and piping were contributing factors to the cause of the petroleum release.

CW³M Company, Inc.
 Stage 3 Site Investigation Plan and Budget
 Aman Food & Gas
 LPC #1610455194 Incident Number 2014-0247

Table 1-1. Underground Storage Tank Summary

Tank Number	Tank Volume (gallons)	Tank Contents	Incident Number	Release Information	Status
1	5,000	Gasoline	2014-0247	Overfills, Piping	Removed 5/1/2014
2	3,000	Gasoline	2014-0247	Overfills, Piping	Removed 5/1/2014
3	4,000	Gasoline	2014-0247	Overfills, Piping	Removed 5/1/2014
4	4,000	Gasoline	-	-	In Use: Installed 5/13/2014
5	6,000	Gasoline	-	-	In Use: Installed 5/13/2014

1.4 EARLY ACTION SUMMARY

Following IEMA notification of the release, Mr. Jeet Singh and Ms. Balbir Kaur requested that CW³M proceed with reporting requirements and early action activities in accordance with 35 Ill Adm. Code 734.

While on site on March 3, 2014, CW³M personnel inspected the USTs and accessible components and obtained a release confirmation/waste characterization samples. The samples had strong visual and olfactory indications of petroleum contamination. The sample results revealed elevated levels of the gasoline fuel indicator contaminants benzene, ethylbenzene, toluene, and total xylenes (BETX), which confirmed a release of gasoline had occurred at the site. This waste characterization sample is also required by the landfill in order to accept the contaminated tank pit fill material as special waste. The results have been tabulated in Appendix E.

Approximately 771.04 tons (514.03 cubic yards) of contaminated backfill was removed from the former tank pit and properly disposed of at the Upper Rock Island Landfill facility in Rock Island, Illinois. Manifests for the contaminated soil disposal were included in the 45-Day Report Addendum (CW³M, 2014c). Samples were collected for every 20 feet of the excavation walls in addition to every 20 feet of piping runs. Floor samples were obtained beneath each tank. Samples were collected and analyzed for BETX, and methyl tert-butyl ether (MTBE). The early action soil analytical results are tabulated in Appendix

*CW³M Company, Inc.
Stage 3 Site Investigation Plan and Budget
Aman Food & Gas
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E. The analytical results confirmed that the most stringent Tier 1 Clean-up Objectives have been exceeded from the release for all BETX contaminants.

1.5 SITE INVESTIGATION SUMMARY

Soil analytical results from waste characterization/release confirmation, early action sampling, Stage 1 investigation sampling and Stage 2 investigation sampling indicate that the most stringent Tier 1 Clean-up Objectives have only been exceeded for the waste characterization samples and early action samples. At the conclusion of the Stage 2 site investigation, the soil contamination plume has been defined to an area encompassing the former tank field. A description of the Stage 1 and 2 site investigations is included in Section 3.1. Analytical results are included in Appendix E.

Groundwater analytical results indicate that the Class I Groundwater Clean-up Objectives have been exceeded on site at MW-3 and MW-6. At the conclusion of the Stage 2 site investigation, the groundwater contamination plume remains undefined to the north-northwest of the site. Analytical results are included in Appendix E.

2. SITE CHARACTERIZATION

2.1 CURRENT AND PROJECTED POST-REMEDATION USES

The site lies near the river front of the city of Moline at the intersection of 5th Avenue and 19th Street. The site is surrounded by light commercial properties and a large apartment complex. The Aman Food & Gas site is currently operating as a convenience store that sells fuel.

2.2 PHYSICAL SETTING

The physical setting, including environmental, geologic, hydrogeologic, hydrologic, geographic, and topographic conditions was described in the 45-Day Report (CW³M, 2014b). Additionally, this information is supplemented by the boring logs from the Stage 1 and Stage 2 Site Investigations, which are included in Appendix D of this report.

*CW³M Company, Inc.
Stage 3 Site Investigation Plan and Budget
Aman Food & Gas
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3. SITE INVESTIGATION RESULTS

3.1 DESCRIPTION OF ACTIVITIES COMPLETED

On October 1, 2014, CW³M personnel were on site to conduct the Stage 1 investigation. MW-1 through MW-5 were drilled, and MW-1 through MW-4 were sampled for soil contamination. Additionally, SB-1 through SB-3 were drilled and sampled for soil contamination. All soil samples were collected from each drilling location and analyzed for BETX and MTBE. Soil analytical results from the Stage 1 investigation indicate that the most stringent Tier 1 Clean-up Objectives (CUOs) for the site have not been exceeded at any of the soil boring locations sampled during the Stage 1 investigation.

CW³M personnel returned to the site on December 11, 2014, to survey and groundwater sample the monitoring wells, MW-1 through MW-5. Groundwater samples were analyzed for BETX and MTBE. Groundwater analytical results from the Stage 1 investigation indicate that the Class I Groundwater CUOs have been exceeded on site at MW-3 for the indicator contaminant benzene.

On April 19, 2016, CW³M personnel were on site to conduct Stage 2 investigation activities. One soil borings (SB-4) and two monitoring wells (MW-6 and MW-7), with soil samples being taken from MW-6, were advanced as part of the plume delineation activities. Soil samples were analyzed for BETX and MTBE indicator contaminants. Soil analytical results from the Stage 2 investigation indicate that the most stringent Tier 1 CUOs for the site have not been exceeded at any of the soil boring locations sampled during the Stage 2 investigation. An additional soil sample was also taken near the location of previously deemed clean well, MW-1, for the Tiered Approach to Corrective Action Objectives (TACO) parameters; this sample was also sampled for BETX and MTBE soil contamination per the IEPA's request. A slug test was also performed on this date at MW-1. The hydraulic conductivity calculations are included herein as Appendix G.

CW³M personnel returned to the site on April 20, 2016 to sample and survey the newly installed monitoring wells. Groundwater samples were analyzed for BETX and MTBE indicator contaminants. Groundwater analytical results from the Stage 2 investigation indicate that the Class I Groundwater CUOs have been exceeded on site at MW-6 for various indicator contaminants. Tables summarizing the results of all soil and groundwater sampling to date, as well as the analytical reports from the Stage 2 investigation, are included herein as Appendix E. Soil boring logs and well completion reports (WCRs) are included in Appendix D.

At the conclusion of the Stage 2 investigation, the soil contamination plume is confined to the property in the vicinity of the former tank field. The only remaining undefined

*CWM Company, Inc.
 Stage 3 Site Investigation Plan and Budget
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contaminated groundwater is to the north-northwest of the site, as dictated by contaminated locations MW-3 and MW-6, therefore justifying the need for an off-site investigation.

3.2 GROUNDWATER FLOW DIRECTION

Based on the groundwater survey conducted on April 20, 2016, the groundwater appears to flow to the west-northwest across the site. Refer to Drawing 0006B in Appendix B for the most recent groundwater flow map. The groundwater flow direction will continue to be evaluated as additional monitoring wells are installed during investigation activities.

3.3 POTABLE WATER SUPPLY SURVEY

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 is has been conducted. The Illinois State Water Survey (ISWS), the Illinois State Geological Survey (ISGS) and the IEPA Division of Public Water Supplies were contacted via the Source Water Assessment Program (SWAP) online.

The ISGS, ISWS, and IEPA Division of Public Water Supplies were accessed online on March 13, 2014 (EPA.STATE.IL.US, 2014). The response indicated that ten ISGS wells are located within 2,500 feet of the site. The response stated that there is a groundwater ordinance for the entire City of Moline (R10083101).

Table 3-1. Water Supply Well Information

Well ID	Type	Distance From USTs (feet)	Setback Zone (feet)
00672	ISGS	2,429	200
00865	ISGS	1,056	200
23575	ISGS	1,848	200
23569	ISGS	2,059	200
23570	ISGS	2,059	200
23571	ISGS	2,059	200
23572	ISGS	2,429	200
23573	ISGS	2,429	200
23574	ISGS	2,429	200
00328	ISGS	475	200

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Aman Food & Gas
LPC #1610455194 Incident Number 2014-0247

3.4 SITE SPECIFIC PHYSICAL PARAMETERS

In accordance with 35 Ill. Adm. Code 734.410, remediation objectives were determined in accordance with 35 Ill. Adm. Code § 742. One of the clean soil boring locations (MW-1) was sampled for TACO parameters. The site specific physical parameters have been determined as follows:

Hydraulic Conductivity (K), 4.91×10^{-6} ft/sec
Soil bulk density (ρ_b), 1.807 g/cm³
Soil particle density (ρ_s), 2.637 g/cm³
Moisture content (w), 0.18
Organic carbon content (f_{oc}), 0.45%

In order to determine the hydraulic conductivity, a slug test was performed during Stage 2 Site Investigation activities. The test was performed by lowering a “slug” constructed of polyvinyl chloride (PVC) into a previously deemed clean monitoring well, MW-1. When the slug is lowered into the well, the groundwater is displaced by the volume of the slug. As the water within the well equilibrates, water depth changes are recorded in relation to the time interval that has passed since the test was initiated.

The hydraulic conductivity calculations are based on the total well depth, screen length and radius, initial water depth, and the water depth change over time. The depth-to-water changes over time were plotted on a semi-logarithmic graph and the curve was evaluated. The slope of the straight-line portion of the curve, along with the other slug test data, is used to calculate the hydraulic conductivity.

Velocity is calculated using the hydraulic conductivity results determined at the site, as well as the hydraulic gradient. The hydraulic gradient is found by calculating the change in gradient between the most up-gradient well and the most down-gradient well, then dividing this answer by the distance in feet between the two wells. Formula R24, ($U_{gw} = K \bullet i$) of 35 Ill. Adm. Code § 742 Appendix C, Table C.

*CWM Company, Inc.
Stage 3 Site Investigation Plan and Budget
Aman Food & Gas
LPC #J1610455194 Incident Number 2014-0247*

4. SITE INVESTIGATION PROPOSAL

4.1 DESCRIPTION OF ACTIVITIES PROPOSED

Two monitoring wells, installed to a depth of fifteen feet, are currently being proposed off-site, one on the property west of the site, and one on the property north of the site across 5th Avenue, respectively, to further define the groundwater contamination plume. The proposed monitoring wells will be sampled for groundwater contamination only. Groundwater samples will be tested for BETX and MTBE contaminants. The locations of the proposed monitoring wells are shown on Drawing 0009 in Appendix B. The proposed locations of the drilling will be completed as accurately as possible; however, their locations may be adjusted to due to actual site and field conditions during the investigation.

4.2 DRILLING METHOD

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

4.3 MONITOR WELL INSTALLATION AND DEVELOPMENT PROTOCOL

Two-inch diameter wells consist of a 10-foot PVC screen and PVC riser above the well screen. Annular space around the wells is filled with coarse-grained, 20/20, sand. Each well is completed at the surface with a flush-mount manway and a locking protective cover. The manways are slightly elevated and the concrete sloped away from each well to prevent surface water run-in. The elevations of the manways are surveyed to the nearest 0.01 foot. Monitoring wells will be set at the depth that groundwater is encountered during drilling with the center screen set at the depth of groundwater.

Monitoring wells are 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 are developed by surging the bailer back and forth for several minutes and then withdrawing groundwater. The development process continues until clear water flows into each well. The purpose of the surging is to remove the undersize sediment from the well and filter pack. All wells are developed the day of installation. WCRs will be prepared for each well installed.

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LPC #1610455194 Incident Number 2014-0247*

4.4 GROUNDWATER SAMPLING PROTOCOL

All samples are collected utilizing proper sampling protocol. Samplers wear clean, disposable latex gloves, which are changed between each sample. The water level in each newly-installed well is 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 are gently poured into 40 milliliter (mL) glass vials for BETX and MTBE analysis. The samples are placed in coolers with ice for delivery to the laboratory. Proper chain-of-custody procedures are followed. Each sample is labeled immediately upon collection and logged onto the chain-of-custody form. The chain-of-custody form is transported with the samples and then relinquished to the laboratory. The data collected is used to determine the groundwater flow directions and whether the applicable groundwater quality standards are exceeded.

5. 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 the locations of proposed soil borings and monitoring wells are included in Appendix B. All maps are prepared in accordance with 35 Ill. Adm. Code 734.440.

A map of the site and any surrounding areas that may be adversely affected by the release of petroleum from the UST systems will be provided at the conclusion of investigation activities in the Site Investigation Completion Report (SICR). At a minimum, the map will be to scale and will show the location of the leaking UST systems with any associated piping and all identified potential natural and/or man-made pathways which are on the site, in right-of-ways attached to the site, or that are in areas that may be adversely affected as a result of the release.

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LPC #1610155194 Incident Number 2014-0247*

6. CONCLUSIONS

Aman Food & Gas, the owner of the USTs, in conjunction with CW³M, will prepare a SICR upon completion of all Stage 3 Site Investigation activities. A description of sampling activities, geologic information, soil boring logs, well completion reports, and analytical results will be included. The SICR will be prepared utilizing all applicable IEPA-prescribed, provided, or approved forms.

*CW³M Company, Inc.
Stage 3 Site Investigation Plan and Budget
Aman Food & Gas
LPC #1610455194 Incident Number 2014-0247*

7. REFERENCES

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CW³M, 2014. CW³M Company, Inc. Request for Extension of Early Action Period. Aman Food & Gas, Moline, Illinois, April 17, 2014.

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APPENDIX B

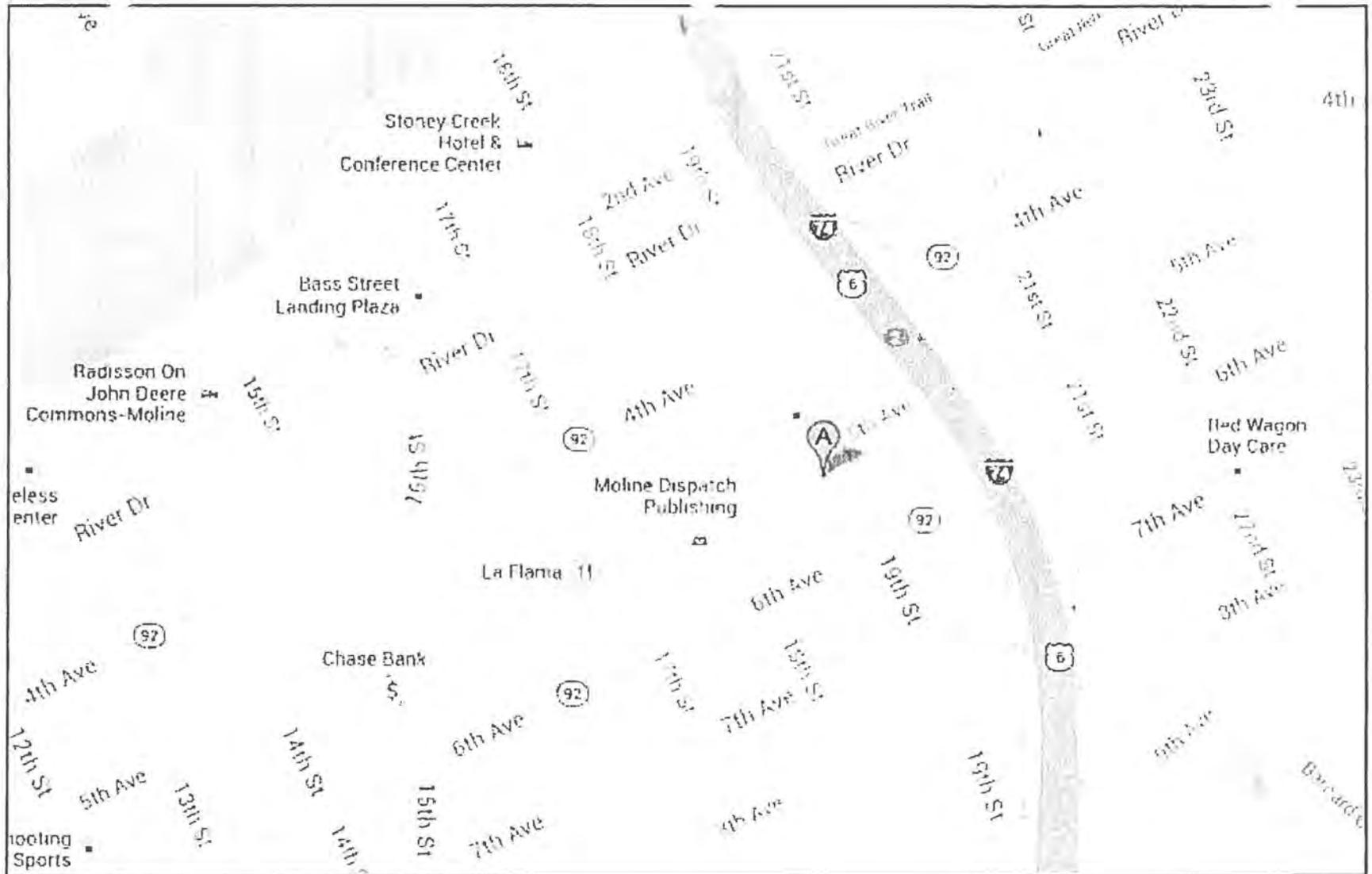
SITE MAPS AND ILLUSTRATIONS

**STAGE 3 SITE INVESTIGATION PLAN AND
BUDGET
AMAN FOOD & GAS
MOLINE, ILLINOIS**

CW²M Company, Inc.
Stage 3 Site Investigation Plan and Budget
Aman Food & Gas
LPC #1610455194 Incident Number 2014-0247

INDEX OF DRAWINGS

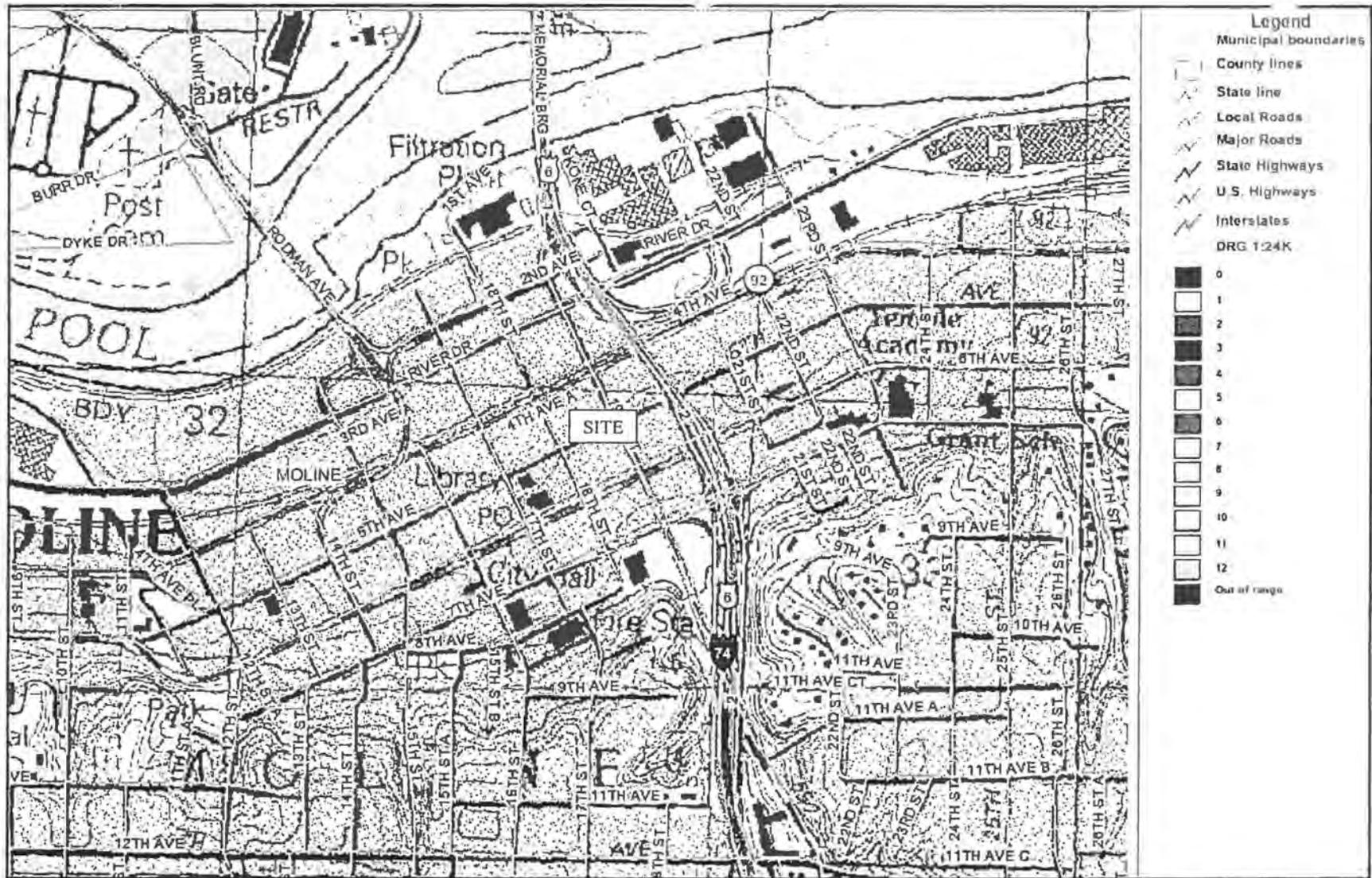
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0001A	Site Location Map	SiteMap.doc
0001B	Topographic Map	TopoMap.doc
0001C	Surrounding Populations Map	SP.doc
0002	Site Map	Site.dwg
0003	Soil Boring Location Map	SBLoc.dwg
0004	Monitoring Well Location Map	MWLoc.dwg
0005	Monitoring Well Elevation Map	MWElev.dwg
0006A	Groundwater Flow Map (October 2014)	GW1014.dwg
0006B	Groundwater Flow Map (April 2016)	GW0416.dwg
0007A	Soil Contamination Values Map (0-5 feet)	SoilCon0-5.dwg
0007B	Soil Contamination Values Map (5-10 feet)	SoilCon5-10.dwg
0008	Groundwater Contamination Values Map	GWCon.dwg
0009	Proposed Monitoring Well Location Map	PMWLoc.dwg



CW³M Company, Inc.
701 South Grand Avenue West
Springfield, IL 62704
(217)-522-8001

Site Location Map
1830 5th Avenue
Moline, Illinois

Drawn By: BMW
Reviewed By: CLR
Drawing 0001A
SiteMap.doc



CW³M Company, Inc.
 701 South Grand Avenue West
 Springfield, IL 62704
 (217)-522-8001

Topographic Map
 1830 5th Avenue
 Moline, Illinois

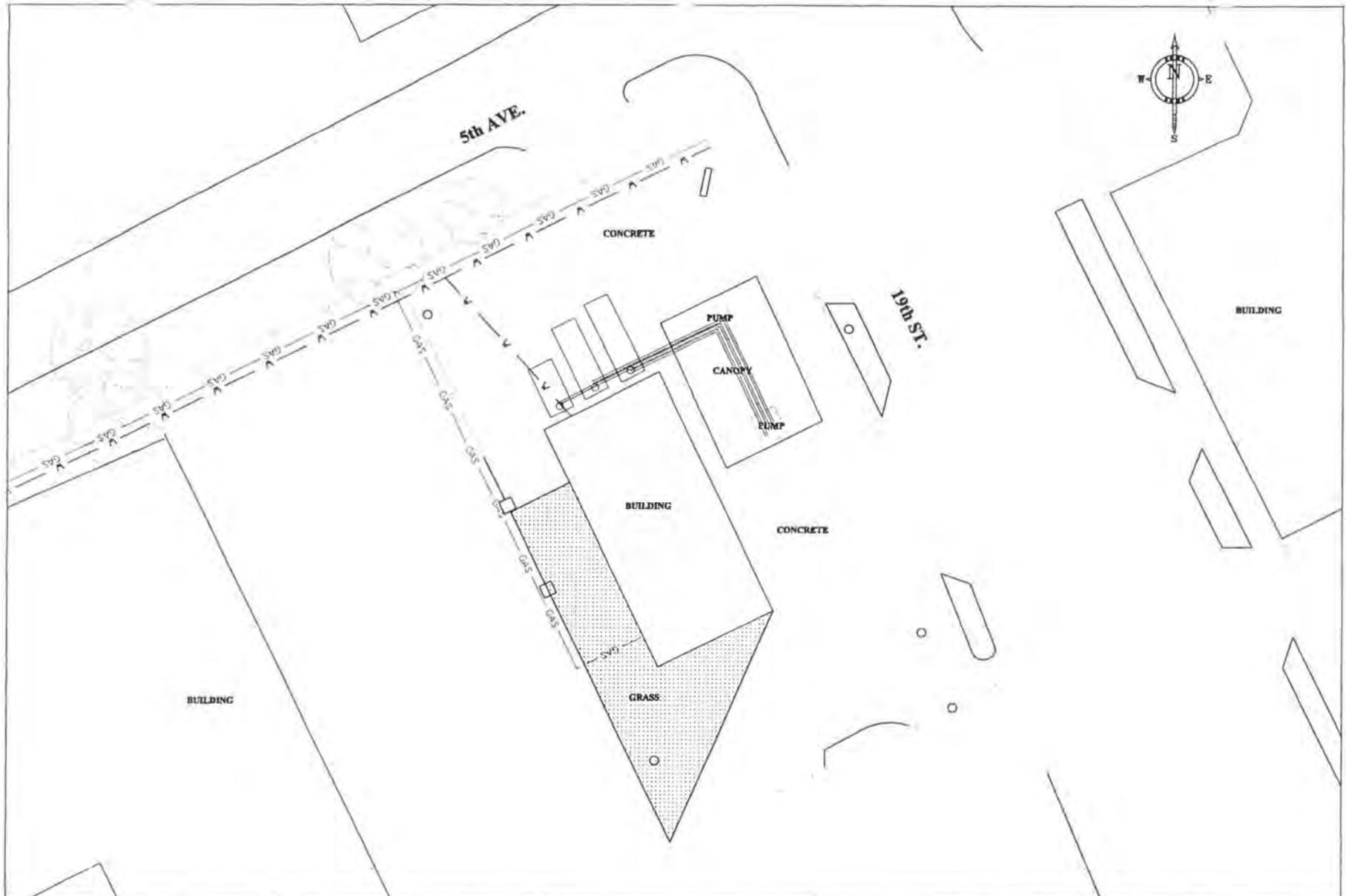
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 Reviewed By: CLR
 Drawing 0001B
 TopoMap.doc



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Springfield, IL 62704
(217)-522-8001

Surrounding Populations Map
1830 5th Avenue
Moline, Illinois

Drawn By: CBMW
Reviewed By: CLR
Drawing 0001C
SP.doc



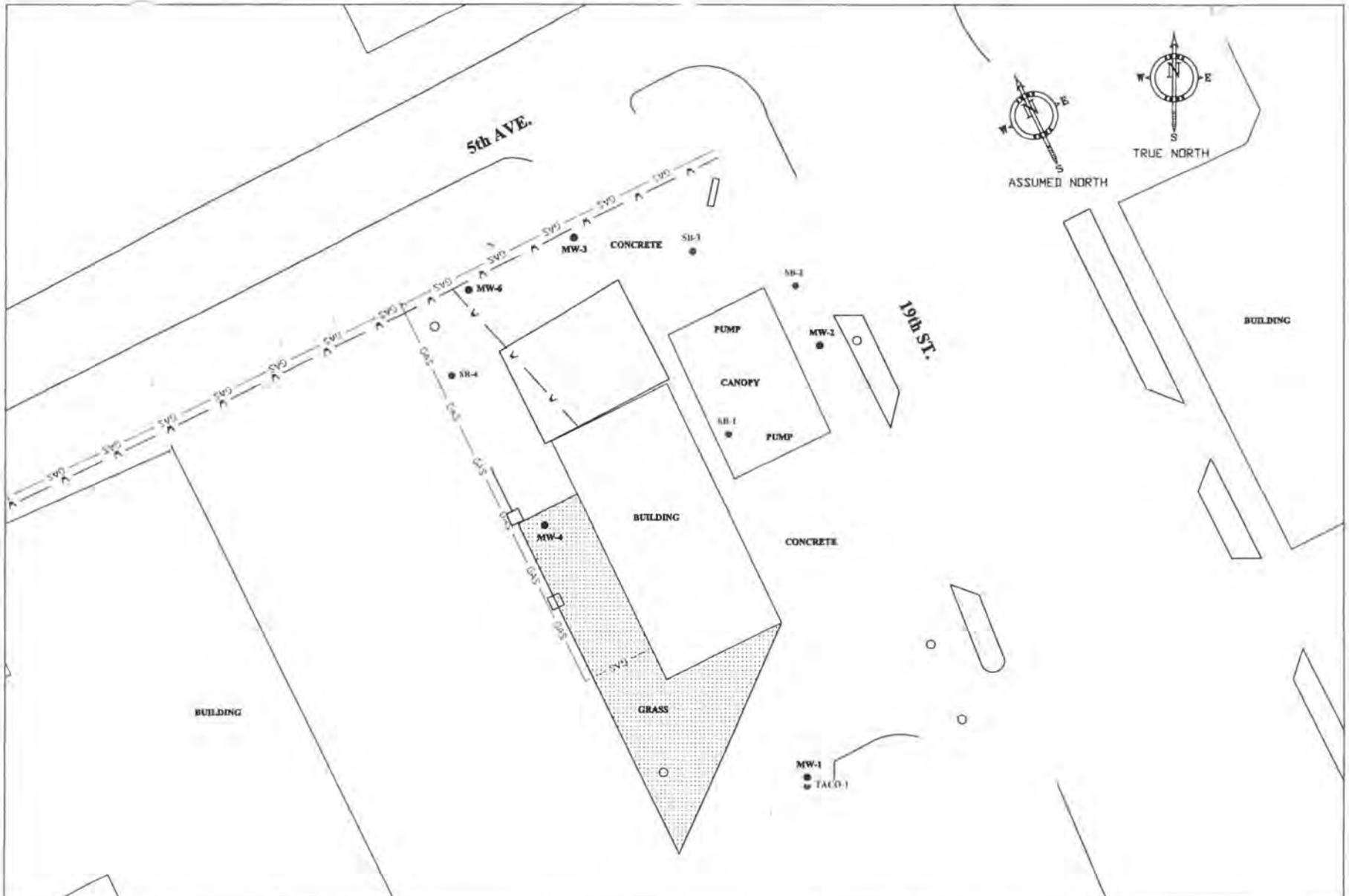
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SPRINGFIELD, IL. 62704
(217) 522-8001

AMAN FOOD & GAS
MOLINE, ILLINOIS
INCIDENT #2014-0247
ROCK ISLAND COUNTY

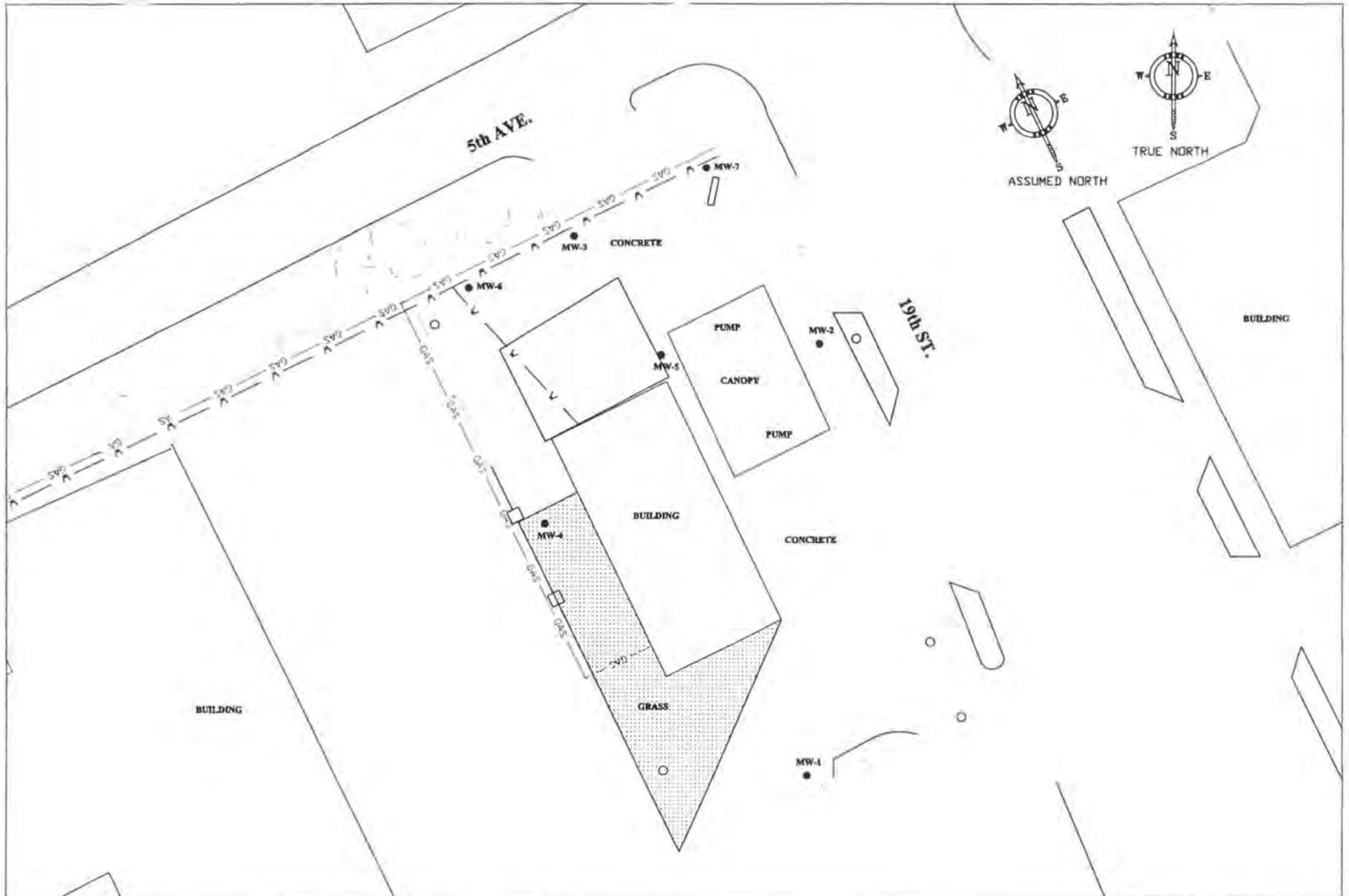
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DATE: 9/5/13
REVISED DATE: 5/1/14
SCALE 1"=30'
DRAWING: 0002

DRAWN BY: MDR
REVISED BY: BMW
REVIEWED BY: CLR
SITE.DWG



<p>CWM COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001</p>	<p>AMAN FOOD & GAS MOLINE, ILLINOIS INCIDENT #2014-0247 ROCK ISLAND COUNTY</p>	<p>SOIL BORING LOCATION MAP</p>	<p>DATE: 1/9/2014 REVISED DATE: 6/22/16 SCALE 1"=30' DRAWING: 0003</p>	<p>DRAWN BY: MJS REVISED BY: REVIEWED BY: CLR SBLOC.DWG</p>
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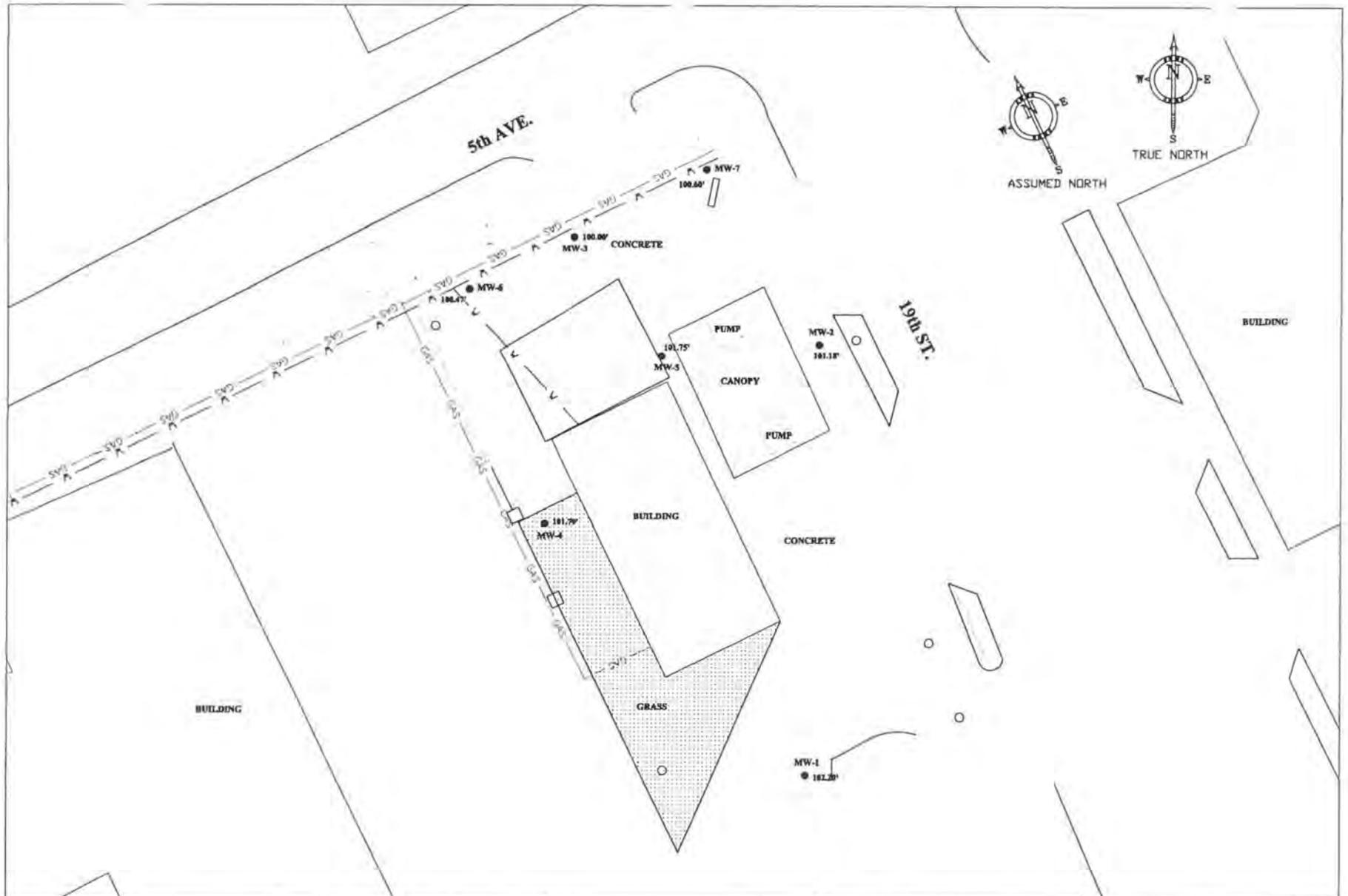
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(217) 522-8001

AMAN FOOD & GAS
MOLINE, ILLINOIS
INCIDENT #2014-0247
ROCK ISLAND COUNTY

MONITORING WELL
LOCATION MAP

DATE: 1/9/2014
REVISED DATE: 6/22/16
SCALE 1"=30'
DRAWING: 0004

DRAWN BY: MJS
REVISED BY:
REVIEWED BY: CLR
MWLOC.DWG



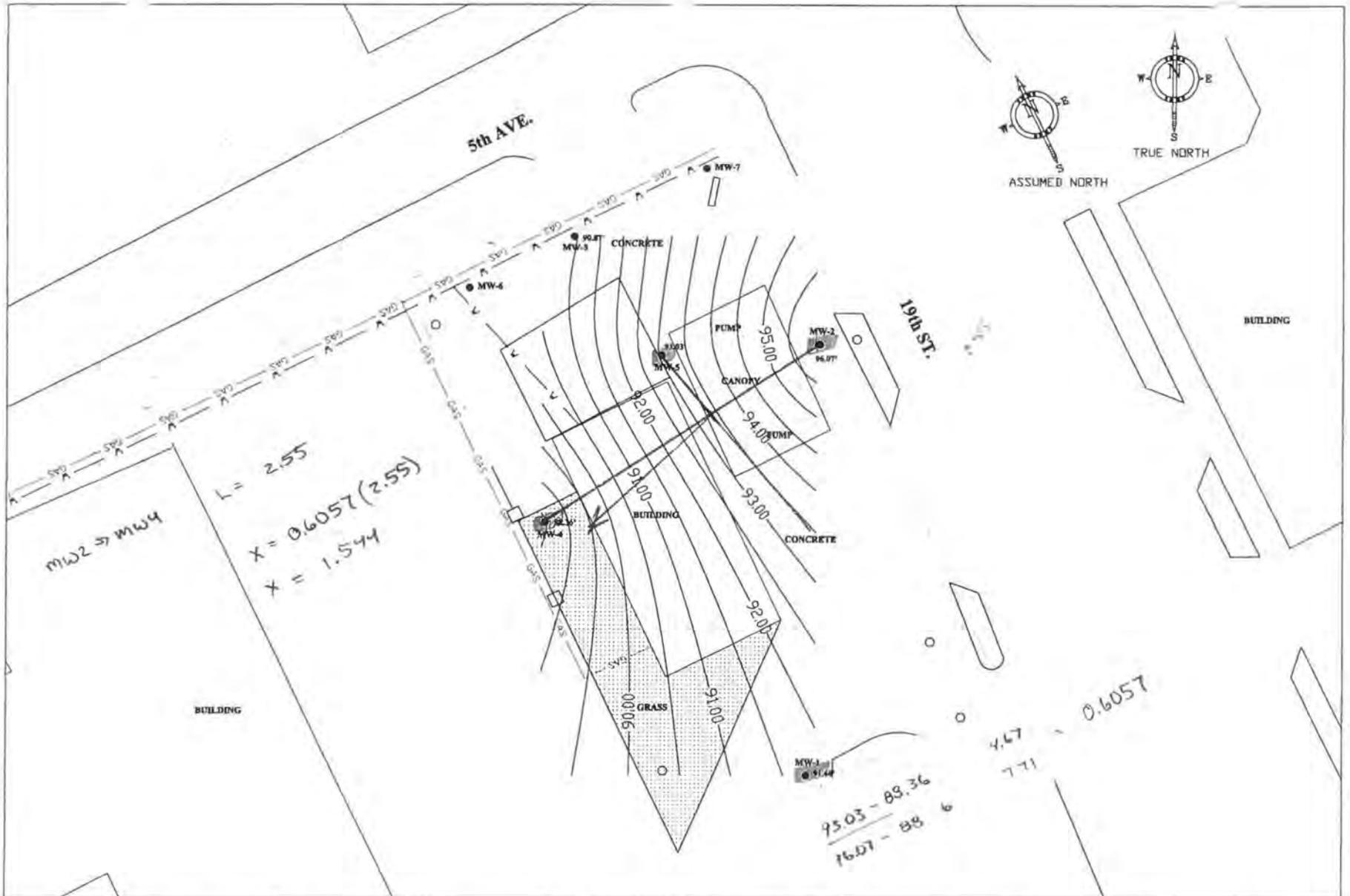
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 MOLINE, ILLINOIS
 INCIDENT #2014-0247
 ROCK ISLAND COUNTY

MONITORING WELL
 ELEVATION MAP

DATE: 1/9/2014
 REVISED DATE: 6/22/16
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 DRAWING: 0005

DRAWN BY: MJS
 REVISED BY:
 REVIEWED BY: CLR
 MWELEV.DWG



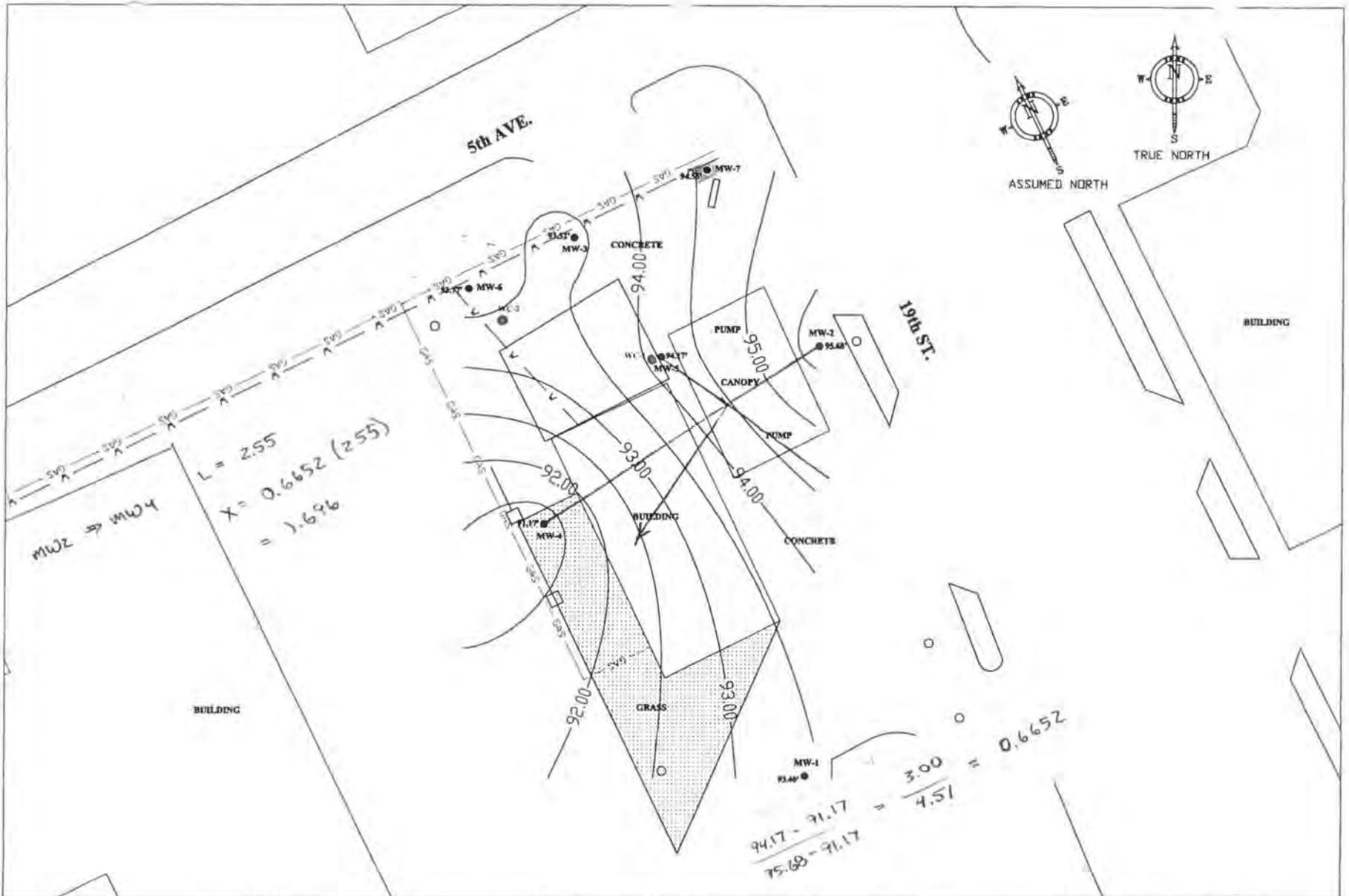
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ROCK ISLAND COUNTY

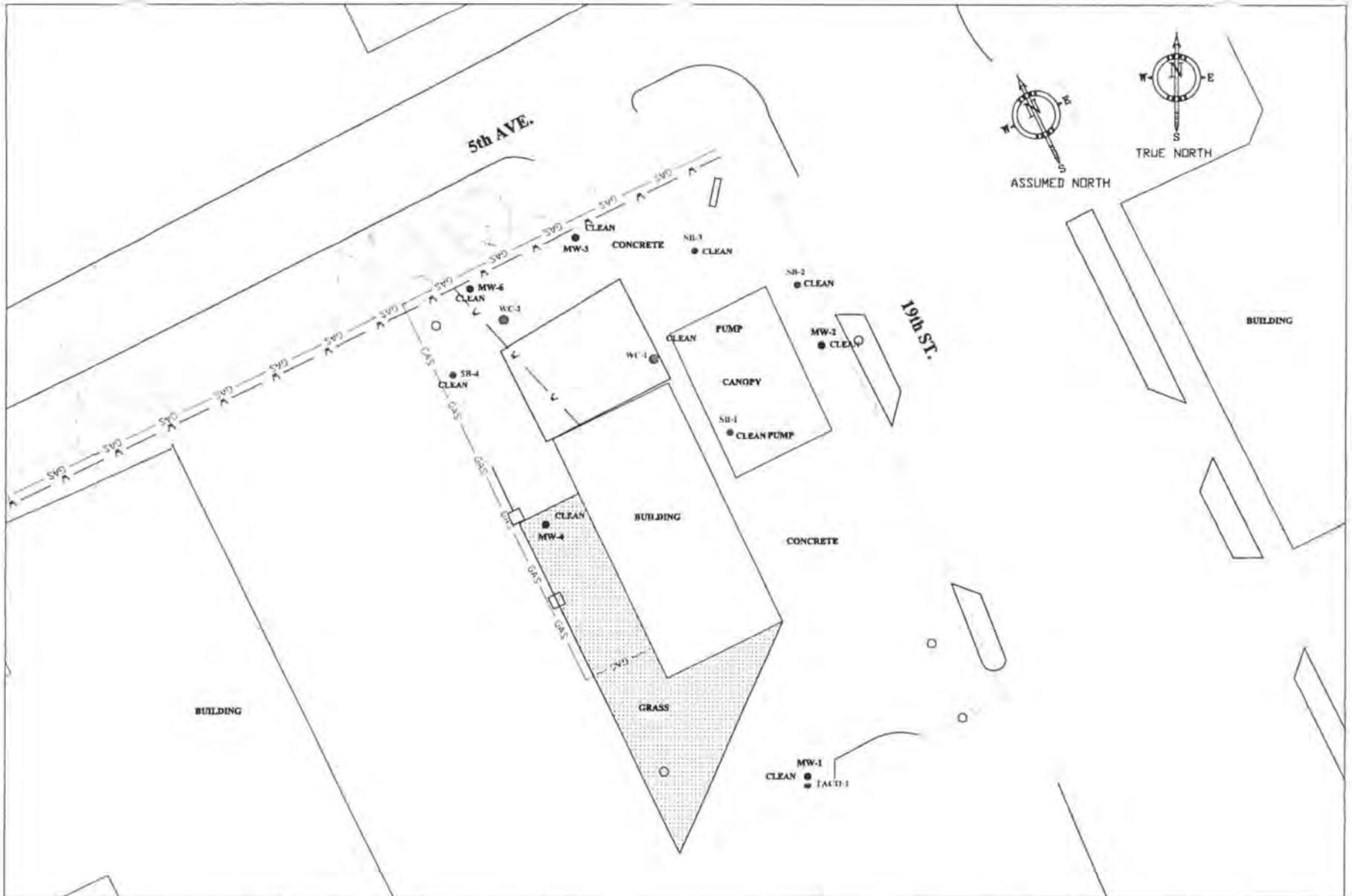
GROUNDWATER
FLOW MAP
(OCTOBER 2014)

DATE: 1/9/2014
REVISED DATE:
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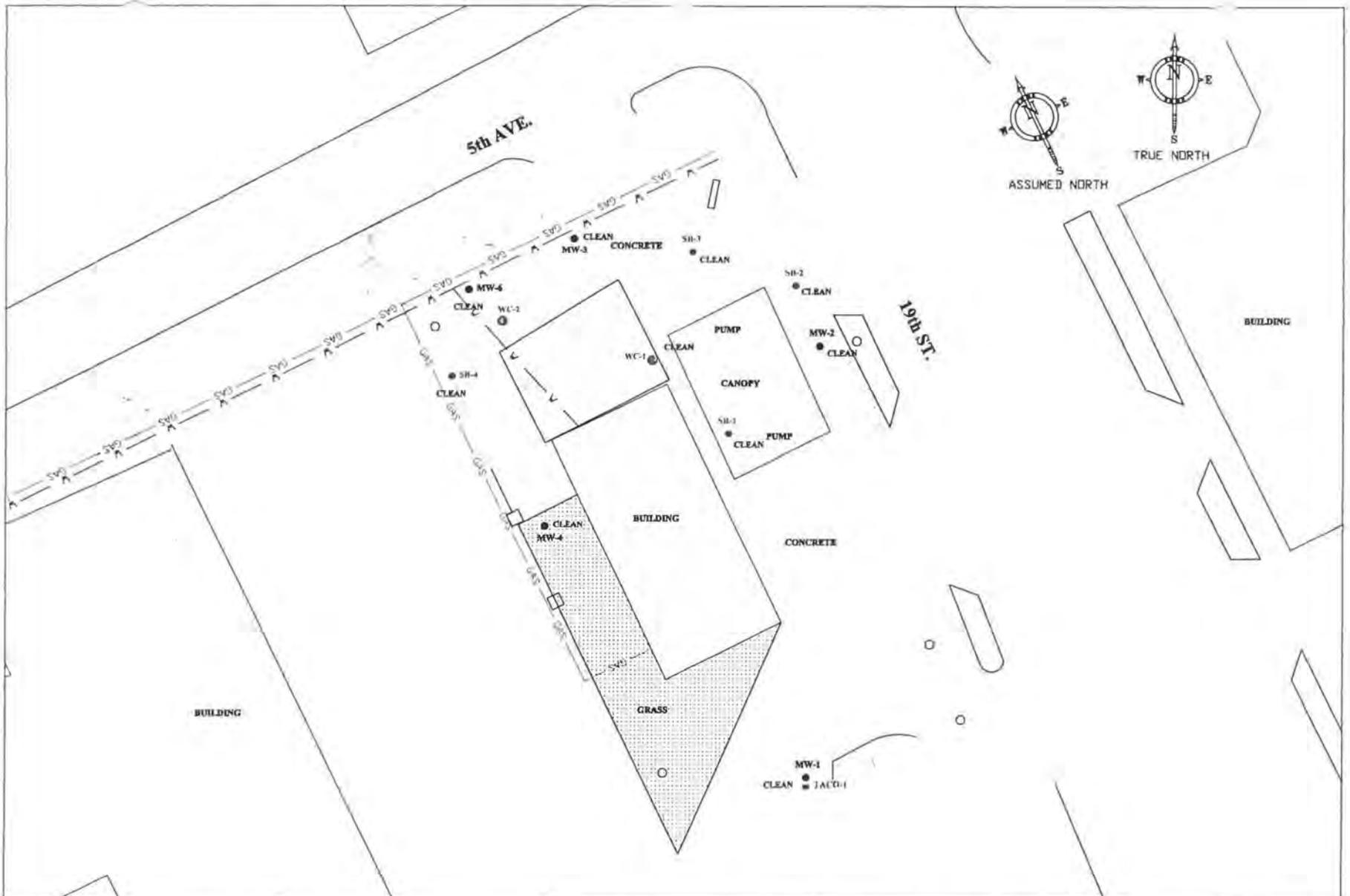
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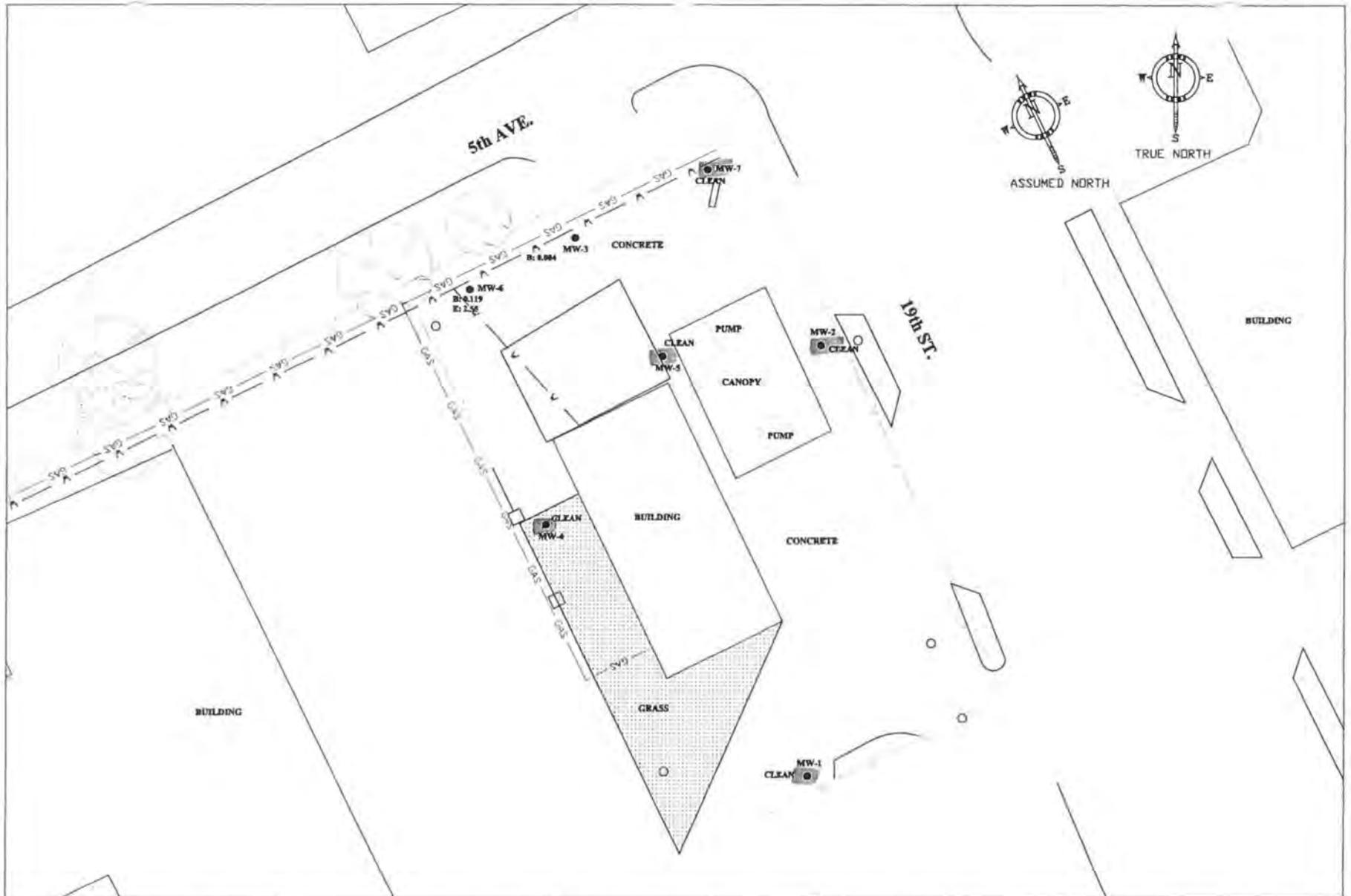
<p>CWM COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001</p>	<p>AMAN FOOD & GAS MOLINE, ILLINOIS INCIDENT #2014-0247 ROCK ISLAND COUNTY</p>	<p>GROUNDWATER FLOW MAP (APRIL 2016)</p>	<p>DATE: 6/22/16 REVISED DATE: SCALE 1"=30' DRAWING: 0006B</p>	<p>DRAWN BY: MJS REVISED BY: REVIEWED BY: CLR GW0416.DWG</p>
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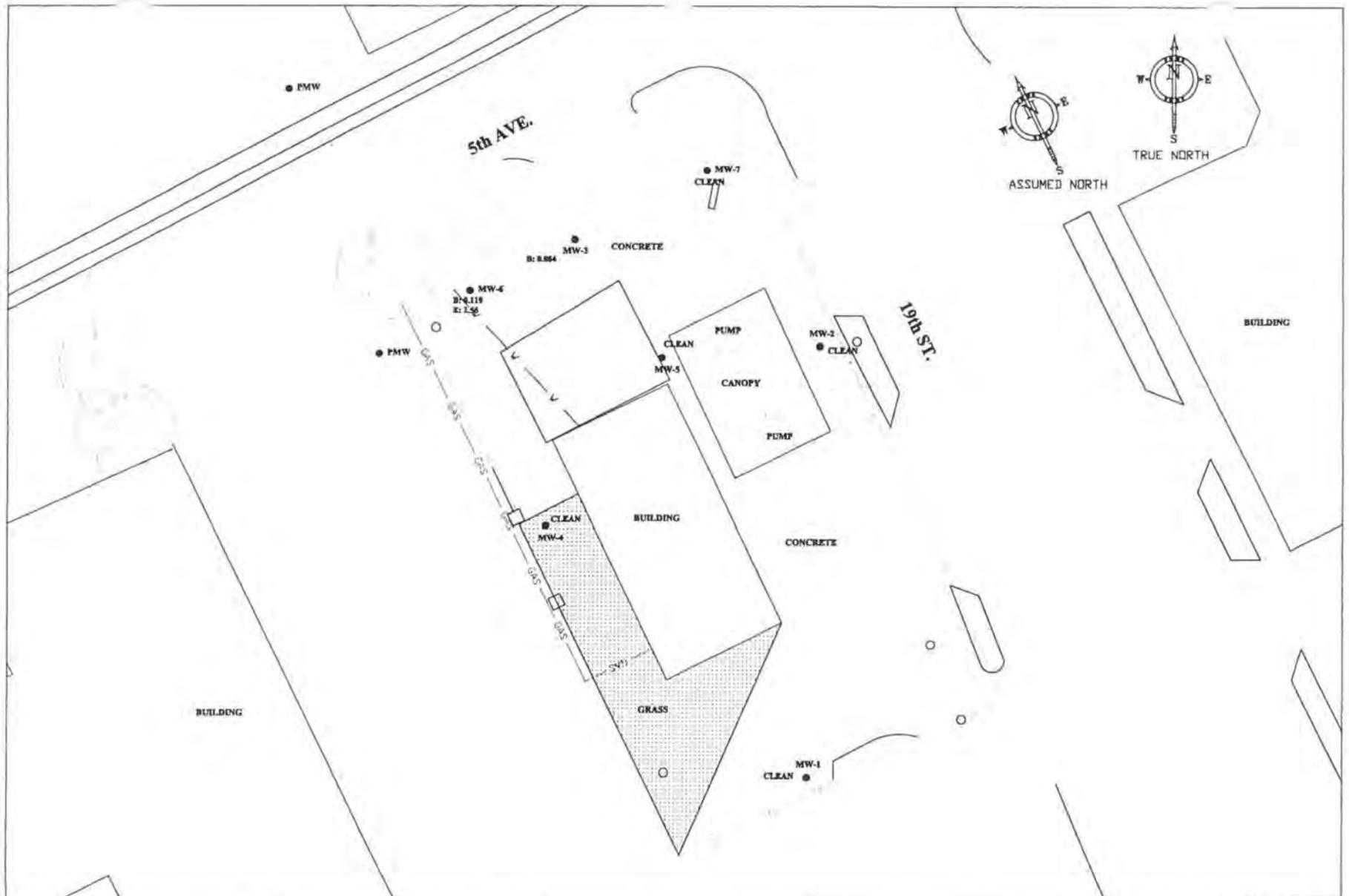
<p>CWM COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001</p>	<p>AMAN FOOD & GAS MOLINE, ILLINOIS INCIDENT #2014-0247 ROCK ISLAND COUNTY</p>	<p>SOIL CONTAMINATION VALUES MAP (0-5 FEET)</p>	<p>DATE: 1/9/2014 REVISED DATE: 6/22/16 SCALE 1"=30' DRAWING: 0007A</p>	<p>DRAWN BY: MJS REVISED BY: REVIEWED BY: CLR SOILCON0-5.DWG</p>
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<p>CWM COMPANY, INC. 701 W. SOUTH GRAND SPRINGFIELD, IL. 62704 (217) 522-8001</p>	<p>AMAN FOOD & GAS MOLINE, ILLINOIS INCIDENT #2014-0247 ROCK ISLAND COUNTY</p>	<p>SOIL CONTAMINATION VALUES MAP (5-10 FEET)</p>	<p>DATE: 1/9/2014 REVISED DATE: 6/22/16 SCALE 1"=30' DRAWING: 0007B</p>	<p>DRAWN BY: MJS REVISED BY: REVIEWED BY: CLR SOILCON5-10.DWG</p>
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 (217) 522-8001

AMAN FOOD & GAS
 MOLINE, ILLINOIS
 INCIDENT #2014-0247
 ROCK ISLAND COUNTY

PROPOSED
MONITORING WELL
LOCATION MAP

DATE: 6/22/16
REVISED DATE:
SCALE 1"=30'
DRAWING: 0009

DRAWN BY: MJS
REVISED BY:
REVIEWED BY: CLR
PMWLOC.DWG

Aman Food Gas
Site Assessment Data

Waste Characterization

	Location	WC-1	WC-2
	Date	3/3/2014	3/3/2014
	Depth		
Parameter	Class I CUO		
Benzene	0.03	4.08	0.12
Ethylbenzene	13.0	83.3	4.86
Toluene	12.0	84.2	3.44
Total Xylenes	5.6	466.	23.7
MTBE	5.6	ND	ND

Aman Food Gas
Soil Data

Early Action

	Location	1	2	3	4	5	6	7
	Date	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014
	Depth							
Parameter	Class I CUO							
Benzene	0.03	0.561	1.4	2.2	1.63	0.14	0.463	0.151
Ethylbenzene	13.0	6.36	28.2	6.42	20.4	0.237	ND	1.3
Toluene	12.0	0.338	0.207	0.102	1.96	ND	ND	1.96
Total Xylenes	5.6	19.1	115.	8.27	93.5	0.879	0.184	7.48
MTBE	0.32	ND						

Aman Food Gas
Soil Data

Early Action

	Location	8	9	10	11	12	13	14
	Date	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014	5/5/2014
	Depth							
Parameter	Class I CUO							
Benzene	0.03	20.3	0.28	0.0467	ND	ND	1.22	0.41
Ethylbenzene	13.0	34.7	4.73	ND	ND	ND	10.3	9.91
Toluene	12.0	133.	10.3	0.0825	ND	ND	0.156	ND
Total Xylenes	5.6	170.	26.1	0.227	ND	ND	24.2	1.7
MTBE	0.32	ND						

Aman Food Gas
Soil Data

Early Action

	Location	15	16	17
	Date	5/5/2014	5/5/2014	5/5/2014
	Depth			
Parameter	Class CUO			
Benzene	0.03	0.346	0.0637	ND
Ethylbenzene	13.0	8.08	0.169	ND
Toluene	12.0	3.05	0.417	ND
Total Xylenes	5.6	41.4	0.924	ND
MTBE	0.32	ND	ND	ND

Aman Food Gas
Soil Data

Stage 1 Soil

	Location	MW-1	MW-1	MW-2	MW-2	MW-3	MW-3	MW-4
	Date	10/1/2014	10/1/2014	10/1/2014	10/1/2014	10/1/2014	10/1/2014	10/1/2014
	Depth	2.5	7.5	2.5	7.5	2.5	7.5	2.5
Parameter	Class I CUO							
Benzene	0.03	ND						
Ethylbenzene	13.0	ND						
Toluene	12.0	ND						
Total Xylenes	5.6	ND						
MTBE	0.32	ND						

Aman Food Gas
Soil Data

Stage 1 Soil

	Location	MW-4	SB-1	SB-1	SB-2	SB-2	SB-3	SB-3
	Date	10/1/2014	10/1/2014	10/1/2014	10/1/2014	10/1/2014	10/1/2014	10/1/2014
	Depth	7.5	2.5	7.5	2.5	7.5	2.5	7.5
Parameter	Class I CUO							
Benzene	0.03	ND						
Ethylbenzene	13.0	ND						
Toluene	12.0	ND						
Total Xylenes	5.6	ND						
MTBE	0.32	ND						

Aman Food Gas
Site Assessment Data

Stage 1 GW

	Location	MW-1	MW-2	MW-3	MW-4	MW-5
	Date	12/11/2014	12/11/2014	12/11/2014	12/11/2014	12/11/2014
Parameter	Class I CUO					
Benzene	0.005	ND	ND	0.084	ND	ND
Ethylbenzene	0.7	ND	ND	0.054	0.034	ND
Toluene	1.0	ND	ND	0.006	0.198	ND
Total Xylenes	10.0	ND	ND	0.051	0.11	ND
MTBE	0.07	ND	ND	ND	ND	ND

Aman Food Gas
Soil Data

Stage 2 Soil

	Location	MW-6	MW-6	SB-4	SB-4
	Date	4/19/2016	4/19/2016	4/19/2016	4/19/2016
	Depth	2.5	7.5	2.5	7.5
Parameter	Class I CUO				
Benzene	0.03	ND	ND	ND	ND
Ethylbenzene	13.0	ND	ND	ND	ND
Toluene	12.0	ND	ND	ND	ND
Total Xylenes	5.6	ND	ND	ND	ND
MTBE	0.32	ND	ND	ND	ND

Aman Food Gas
Site Assessment Data

Stage 2 GW

	Location	MW-6	MW-7
	Date	4/20/2016	4/20/2016
Parameter	Class I CUO		
Benzene	0.005	0.119	ND
Ethylbenzene	0.7	2.55	ND
Toluene	1.0	0.013	ND
Total Xylenes	10.0	6.0	ND
MTBE	0.07	ND	ND

Site	Aman Food & Gas
Sample ID	TACO-1
Date	4/19/2016
FOC	0.45%
Gravel	0%
Sand	9.50%
Silt	83.30%
Clay	3.10%
Bulk Density	1.807 g/cm ³
Percent Moisture	18.00%
Specific Gravity	2.637 g/cm ³

APPENDIX D

BORING LOGS AND WELL COMPLETION REPORTS

**STAGE 3 SITE INVESTIGATION PLAN AND
BUDGET
AMAN FOOD & GAS
MOLINE, ILLINOIS**



Illinois Environmental Protection Agency

**CW M COMPANY, INC.
DRILLING BOREHOLE LOG**

Page 1 of 1

T INCIDENT # 2014-0247		BOREHOLE NUMBER: RC-1	
SITE NAME: Aman Food & Gas - Moline		BORING LOCATION: 48' W & 6' S from NW corner of station	
SITE ADDRESS: 1830 5th Avenue Moline, IL 61265		RIG TYPE: Truck Mounted Drill Rig	
DATE/TIME STARTED: 2/19/13 1:00 pm		DRILLING/SAMPLE METHOD: continuous sampling/hollow stem auger	
DATE/TIME FINISHED: 2/19/13 1:20 pm		BACKFILL: Grout/Cuttings	

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	Black silty loam, topsoil						
2	Dark brown silty clay	CL	90%	0			
3							
4							
5							
6	Gray silty clay	CL					
8			95%				
9	Gray clayey silt	ML		960.3	Grab	RC-1-8.5'	Odor & discoloration Waste characterization parameters
10	End of boring - 10'						
11							
12							
13							
14							
15							

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

NOTES:

Manway / Surface Elevation:



Groundwater Depth While Drilling: N/A Auger Depth: 10' Driller: CW M



Groundwater Depth After Drilling: Rotary Depth: Geologist: MAB

 Illinois Environmental Protection Agency		CW M COMPANY, INC. DRILLING BOREHOLE LOG					
		Page 1 of 1					
INCIDENT # 2014-0247		BOREHOLE NUMBER: WC-1					
SITE NAME: Aman Food & Gas - Moline SITE ADDRESS: 1830 5th Avenue Moline, IL 61265		BORING LOCATION: 3' West & 6' North of Northeast Corner of Building					
DATE/TIME STARTED: 3/3/14 11:10 AM DATE/TIME FINISHED: 3/3/14 11:30 AM		RIG TYPE: Geoprobe DRILLING/SAMPLE METHOD: continuous sampling/hollow stem auger					
		BACKFILL: grout					
DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0							
1	concrete with gravel subbase	OM					odor and discoloration throughout worsening with depth
2							
3	backfill sand		90%	695	grab	WC1-2.5'	
4							
5							
6							
7							
8			100%	1245.0	grab	WC1-7.5	BETX, MTBE
9							softens
10	End of boring 10'						
11							
12							
13							
14							
15							
Stratification lines are approximate, in-situ transition between soil types may be gradual NOTES: Sample collected at 7.5' depth based on PID reading, odor and discoloration							
Manway / Surface Elevation:							
 Groundwater Depth While Drilling:		10'	Auger Depth: 10'		Driller: CW M		
 Groundwater Depth After Drilling:			Rotary Depth:		Geologist: MDR		



Illinois Environmental Protection Agency

**CW M COMPANY, INC.
DRILLING BOREHOLE LOG**

Page 1 of 1

INCIDENT # 2014-0247

BOREHOLE NUMBER: WC-2

SITE NAME: Aman Food & Gas - Moline

BORING LOCATION: 15'W and 33'N of NW Corner of Building

SITE ADDRESS: 1830 5th Avenue
Moline, IL 61265

RIG TYPE: Geoprobe

DATE/TIME STARTED: 3-3-2014 11:30

DRILLING/SAMPLE METHOD: continuous sampling/hollow stem auger

DATE/TIME FINISHED: 3-3-2014 11:50

BACKFILL: grout

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	concrete with gravel subbase	OM					odor and discoloration throughout most visable at 5'
1							
2	backfill sand		90%				
3							
4							
5	Grey Mottled Brown clayey silt, loam	CL		850	grab	WC2-2.5'	BETX, MTBE, Flash point, PH Paint Filter
6	trace sand						
7.5			100%	422.0	grab	WC2-7.5	
8							
9							
10	End of boring 10'						
11							
12							
13							
14							
15							

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

NOTES: Sample collected at 7.5' depth based on PID reading, odor and discoloration

Manway / Surface Elevation:

▼ Groundwater Depth While Drilling: 10' Auger Depth: 10' Driller: CW M

▽ Groundwater Depth After Drilling: Rotary Depth: Geologist: MDR



Illinois Environmental Protection Agency

**CW M COMPANY, INC.
DRILLING BOREHOLE LOG**

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L-37 INCIDENT # 2014-0247		BOREHOLE NUMBER: MW-1	
SITE NAME: Aman Food & Gas - Moline 1830 5th Avenue Moline, IL 61265		BORING LOCATION: 35' S and 10' W of SE corner of building	
DATE/TIME STARTED: 10-1-14 9:30 AM		RIG TYPE: Truck Mounted Drill	
DATE/TIME FINISHED: 10-1-14 10:15 AM		DRILLING/SAMPLE METHOD: Hollow Stem Auger	
		BACKFILL: N/A - Well Set	

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Subbase						No Odor or Discoloration
1	Light Brown Silty Clay	CL	90%	10.0	Grab	MW-1 2.5'	BETX, MTBE
2							
3							
4	Brown Silty Clay with Trace of Sand	CL	100%	12.0	Grab	MW-1 7.5'	BETX, MTBE
5							
6							
7							
8							
9							
10							
11							Wet
12							
13			100%				
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' per regs

Manway / Surface Elevation: 102.2'

▼ Groundwater Depth While Drilling:	~10'	Auger Depth:	15'	Driller:	AEDC
▽ Groundwater Depth After Drilling:		Rotary Depth:		Installer:	MDR/MJS



Illinois Environmental Protection Agency

CW M COMPANY, INC.
DRILLING BOREHOLE LOG

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ST INCIDENT # 2014-0247	BOREHOLE NUMBER: MW-2
SITE NAME: Aman Food & Gas - Moline 1830 5th Avenue Moline, IL 61265	BORING LOCATION: 36' E and 54' N of SE corner of building
DATE/TIME STARTED: 10-1-14 10:15 AM	RIG TYPE: Truck Mounted Drill
DATE/TIME FINISHED: 10-1-14 11:00 AM	DRILLING/SAMPLE METHOD: Hollow Stem Auger
	BACKFILL: N/A - Well Set

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Concrete						
	Subbase						No Odor or Discoloration
1	Dark Brown Silty Clay	CL	95%	15.0	Grab	MW-2 2.5'	BETX, MTBE
2							
3							
4	Brown Silty Clay	CL	100%	10.0	Grab	MW-2 7.5'	BETX, MTBE
5							
6							
7	Brown Silty Clay with Traces of Sand	CL	90%				Wet
8							
9							
10							
11							
12							
13							
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' per regs

Manway / Surface Elevation: 101.18'

▼ Groundwater Depth While Drilling: ~10'	Auger Depth: 15'	Driller: AEDC
▽ Groundwater Depth After Drilling:	Rotary Depth:	Installer: MDR/MJS



Illinois Environmental Protection Agency

**CW M COMPANY, INC.
DRILLING BOREHOLE LOG**

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INCIDENT # 2014-0247	BOREHOLE NUMBER: MW-3
SITE NAME: Aman Food & Gas - Moline 1830 5th Avenue Moline, IL 61265	BORING LOCATION: 40' N and 5' W of NE corner of building
DATE/TIME STARTED: 10-1-14 11:00 AM	RIG TYPE: Truck Mounted Drill
DATE/TIME FINISHED: 10-1-14 11:45 AM	DRILLING/SAMPLE METHOD: Hollow Stem Auger
	BACKFILL: N/A - Well Set

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Concrete						
	Subbase						No Odor or Discoloration
1	Dark Brown Silty Clay	CL					
2			90%	25.0	Grab	MW-3 2.5'	BETX, MTBE
3							
4	Brown Silty Clay	CL					
5							
6							
7			100%	42.0	Grab	MW-3 7.5'	BETX, MTBE
8							
9							
10							
11							Wet
12							
13			100%				
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' per regs

Manway / Surface Elevation: 100.0'

▼ Groundwater Depth While Drilling: ~10' Auger Depth: 15' Driller: AEDC

▽ Groundwater Depth After Drilling: Rotary Depth: Installer: MDR/MJS

 Illinois Environmental Protection Agency		CW M COMPANY, INC. DRILLING BOREHOLE LOG					
		Page 1 of 1					
INCIDENT # 2014-0247			BOREHOLE NUMBER: MW-4				
SITE NAME: Aman Food & Gas - Moline 1830 5th Avenue Moline, IL 61265			BORING LOCATION: 10' W and 45' N of SW corner of building				
DATE/TIME STARTED: 10-1-14 11:45 AM			RIG TYPE: Truck Mounted Drill				
DATE/TIME FINISHED: 10-1-14 12:30 PM			DRILLING/SAMPLE METHOD: Hollow Stem Auger				
			BACKFILL: N/A - Well Set				
DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Grass						
	Top Soil						No Odor or Discoloration
1	Dark Brown Silty Clay	CL					
2			95%	11.0	Grab	MW-4 2.5'	BETX, MTBE
3							
4	Brown Silty Clay	CL					
5							
6							
8			100%	16.0	Grab	MW-4 7.5'	BETX, MTBE
9							
10							
11							Wet
12							
13							
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' per regs							
Manway / Surface Elevation:		101.79'					
 Groundwater Depth While Drilling:		~10'		Auger Depth: 15'		Driller: AEDC	
 Groundwater Depth After Drilling:				Rotary Depth:		Installer: MDR/MJS	

 Illinois Environmental Protection Agency		CW M COMPANY, INC. DRILLING BOREHOLE LOG					
		Page 1 of 1					
JT INCIDENT # 2014-0247				BOREHOLE NUMBER: MW-5			
SITE NAME: Aman Food & Gas - Moline 1830 5th Avenue Moline, IL 61265				BORING LOCATION: 3' W & 6' N of NE corner of building			
DATE/TIME STARTED: 10-1-14 12:30 PM				DRILLING/SAMPLE METHOD: Hollow Stem Auger			
DATE/TIME FINISHED: 10-1-14 1:15 PM				BACKFILL: N/A - Well Set			
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	Gravel Subbase	OM					Odor and Discoloration
2	Backfill Sand		90%	700	-	-	
3							
4							
5							
6							
7							
8			100%	1200.0	-	-	
9							
10							
11							Wet
12							
13							
14							
15	End of Boring 15'						
Stratification lines are approximate, in-situ transition between soil types may be gradual.							
NOTES: Well Installation: Field Screened Only							
Manway / Surface Elevation:		101.75'					
 Groundwater Depth While Drilling:		10'	Auger Depth:		15'	Driller: AEDC	
 Groundwater Depth After Drilling:		Rotary Depth:		Installer: MDR/MJS			

 Illinois Environmental Protection Agency		CW M COMPANY, INC. DRILLING BOREHOLE LOG					
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INCIDENT # 2014-0247				BOREHOLE NUMBER: SB-1			
SITE NAME: Aman Food & Gas - Moline				BORING LOCATION: 45' N and 8' E corner of SE building			
SITE ADDRESS: 1830 5th Avenue Moline, IL 61265				RIG TYPE: Truck Mounted Drill Rig			
DATE/TIME STARTED: 10/1/14 1:15 PM				DRILLING/SAMPLE METHOD: continuous sampling/hollow stem auger			
DATE/TIME FINISHED: 10/1/14 1:30 PM				BACKFILL: grout			
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	Subbase						No odor or discoloration
2	Light brown silty clay	CL	90%	5.0	Grab	SB-1 2.5'	BETX, MTBE
3							
4							
5							
6							
8			90%	20.0	Grab	SB-1 7.5'	BETX, MTBE
9							
10							Wet
11	End of Boring 10'						
12							
13							
14							
15							
Stratification lines are approximate, in-situ transition between soil types may be gradual.							
NOTES: Sampled at 2.5 and 7.5 per regs							
Manway / Surface Elevation:							
 Groundwater Depth While Drilling:		~ 10	Auger Depth: 10'		Driller: AEDC		
 Groundwater Depth After Drilling:			Rotary Depth:		Geologist: MDR,MJS		

 Illinois Environmental Protection Agency		CW M COMPANY, INC. DRILLING BOREHOLE LOG					
						Page 1 of 1	
INCIDENT # 2014-0247			BOREHOLE NUMBER: SB-2				
SITE NAME: Aman Food & Gas - Moline			BORING LOCATION: 37' E and 7' N of NE corner of building				
SITE ADDRESS: 1830 5th Avenue Moline, IL 61265			RIG TYPE: Truck Mounted Drill Rig				
DATE/TIME STARTED: 10/1/14 1:30 PM			DRILLING/SAMPLE METHOD: Push				
DATE/TIME FINISHED: 10/1/14 1:45 PM			BACKFILL: grout				
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	Subbase						No odor or discoloration
2	Dark brown silty clay	CL	95%	12.0	Grab	SB-2 2.5'	BETX, MTBE
4	Brown silty clay	CL					
8			100%	8.0	Grab	SB-2 7.5'	BETX, MTBE
10	End of Boring 10'						wet
11							
12							
13							
14							
15							
Stratification lines are approximate, in-situ transition between soil types may be gradual.							
NOTES: Sampled 2.5 and 7.5 per regs							
Manway / Surface Elevation:							
 Groundwater Depth While Drilling:		~ 10	Auger Depth: 10'		Driller: AEDC		
 Groundwater Depth After Drilling:			Rotary Depth:		Geologist: MDR/MJS		



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**CW M COMPANY, INC.
DRILLING BOREHOLE LOG**

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INCIDENT # 2014-0247		BOREHOLE NUMBER: SB-3	
SITE NAME: Aman Food & Gas - Moline		BORING LOCATION: 25' N and 17' E of NE corner building	
SITE ADDRESS: 1830 5th Avenue Moline, IL 61265		RIG TYPE: Truck Mounted Drill Rig	
DATE/TIME STARTED: 10/1/14 1:45 PM		DRILLING/SAMPLE METHOD: push	
DATE/TIME FINISHED: 10/1/14 2:00 PM		BACKFILL: grout	

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)	
0	Concrete							
	Subbase						No Odor / Discoloration	
1	Brown silty clay	CL						
2			90%	23.0	Grab	SB-3 2.5'	BETX, MTBE	
3								
4								
5								
6								
8			100%	54.0	Grab	SB-3 7.5	BETX, MTBE	
9								
10								Wet
11			End of Boring 10'					
12								
13								
14								
15								

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

NOTES: Sampled 2.5 and 7.5 per regs

Manway / Surface Elevation:

▼ Groundwater Depth While Drilling: ~ 10	Auger Depth: 10'	Driller: AEDC
▽ Groundwater Depth After Drilling:	Rotary Depth:	Geologist: MDR,MJS

 Illinois Environmental Protection Agency		CW M COMPANY, INC. DRILLING BOREHOLE LOG					
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INCIDENT # 2014-0247				BOREHOLE NUMBER: SB-4			
SITE NAME: Aman Food & Gas - Moline				BORING LOCATION: 30' N and 15' E of NW corner building			
SITE ADDRESS: 1830 5th Avenue Moline, IL 61265				RIG TYPE: Truck Mounted Drill Rig			
DATE/TIME STARTED: 4/19/16 12:15 PM				DRILLING/SAMPLE METHOD: push			
DATE/TIME FINISHED: 4/19/16 12:30 PM				BACKFILL: grout			
DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Top soil	OL					
1							No Odor / Discoloration
2	Dark brown silty clay	CL	95%	0.0	Grab	SB-4 2.5"	BETX, MTBE
3							
4							
5	Brown silty clay	CL					
6							
7							
8			100%	0.0	Grab	SB-4 7.5	BETX, MTBE
9							Wet
10	End of Boring 10'						
11							
12							
13							
14							
15							
Stratification lines are approximate, in-situ transition between soil types may be gradual.							
NOTES: Sampled 2.5 and 7.5 per regs							
Manway / Surface Elevation:							
 Groundwater Depth While Drilling:		~9-10	Auger Depth: 10'		Driller: AEDC		
 Groundwater Depth After Drilling:			Rotary Depth:		Geologist: MDR,MJS		



Illinois Environmental Protection Agency

**CW M COMPANY, INC.
DRILLING BOREHOLE LOG**

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PROJECT INCIDENT # 2014-02-7		BOREHOLE NUMBER: MW-6	
SITE NAME: Aman Food & Gas - Moline 1830 5th Avenue Moline, IL 61265		BORING LOCATION: 37' N & 2' E of NW corner of building	
DATE/TIME STARTED: 4-19-16 10:30 AM		RIG TYPE: Truck Mounted Drill	
DATE/TIME FINISHED: 4-19-16 11:15 AM		DRILLING/SAMPLE METHOD: Hollow Stem Auger	
BACKFILL: N/A - Well Set			

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	Subbase	GP					Slight Odor/Discoloration
2	Dark Brown Silty Clay	CL	90%	14	Grab	MW-6 2.5'	BETX, MTBE
3							
4							
5	Brown Silty Clay	CL					
6							
8			100%	95.0	Grab	MW-6 7.5"	BETX, MTBE
9							
10							
11							
12							
13			100%				
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' per regs

Manway / Surface Elevation: 100.47'

▼ Groundwater Depth While Drilling: 9-10' Auger Depth: 15' Driller: AEDC

▽ Groundwater Depth After Drilling: Rotary Depth: Installer: MDR/MJS



Illinois Environmental Protection Agency

CW M COMPANY, INC.
DRILLING BOREHOLE LOG

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INCIDENT # 2014-0247	BOREHOLE NUMBER: MW-7
SITE NAME: Aman Food & Gas - Moline 1830 5th Avenue Moline, IL 61265	BORING LOCATION: 40' N & 30' E of NE corner of building
DATE/TIME STARTED: 4-19-16 11:15 AM	RIG TYPE: Truck Mounted Drill
DATE/TIME FINISHED: 4-19-16 12:00 PM	DRILLING/SAMPLE METHOD: Hollow Stem Auger
	BACKFILL: N/A - Well Set

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	Subbase	GP					No Odor or Discoloration
2	Dark Brown Silty Clay	CL	90%	0	Grab	MW-7 2.5'	
3							
4							
5							
6	Brown Silty Clay	CL	95%	0.0	Grab	MW-7 7.5'	Wet
7							
8							
9							
10							
11							
12							
13			100%				
14							
15	End of Boring 15'						

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

NOTES: Samples Field Screened Only

Manway / Surface Elevation: 100.60'

Groundwater Depth While Drilling: 9-10' Auger Depth: 15' Driller: AEDC

Groundwater Depth After Drilling: Rotary Depth: Installer: MDR/MJS



Illinois Environmental Protection Agency

CW M COMPANY, INC.
DRILLING BOREHOLE LOG

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PROJECT INCIDENT # 2014-0247		BOREHOLE NUMBER: TACO-1	
SITE NAME: Aman Food & Gas - Moline		BORING LOCATION: 2' S of MW-1	
SITE ADDRESS: 1830 5th Avenue Moline, IL 61265		RIG TYPE: Truck Mounted Drill Rig	
DATE/TIME STARTED: 4/19/16 12:00 PM		DRILLING/SAMPLE METHOD: push	
DATE/TIME FINISHED: 4/19/16 12:15 PM		BACKFILL: grout	

DEPTH (FEET)	SOIL AND ROCK DESCRIPTION	USCS CLASS	Sample Recovery	PID (ppm)	Sample Type	SAMPLE NUMBER	REMARKS: (Odor, Color, Moisture, Penetrometer, etc.)
0	Concrete						
	Subbase						No Odor / Discoloration
1	Light brown silty clay	CL	90%	0.0	Grab	TACO-1 2.5'	
2							
3							
4							
5							
6	Brown silty clay with trace of sand	CL	100%	0.0	Grab	TACO-1 7.5'	BETX, MTBE, TACO Parameters
8							
9							
10	End of Boring 10'						Wet
11							
12							
13							
14							
15							

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

NOTES: Sampled for TACO as well as BETX, MTBE per IEPA Request

Manway / Surface Elevation:

▼ Groundwater Depth While Drilling: ~9' 10"	Auger Depth: 10'	Driller: AEDC
▽ Groundwater Depth After Drilling:	Rotary Depth:	Geologist: MDR,MJS

Illinois Environmental Protection Agency

LUST Well Completion Report

Incident No. 2014-0247
 Site Name Aman Food & Gas
 Drilling Contractor AEDC
 Driller AEDC
 Drilling Method Hollow Stem Auger

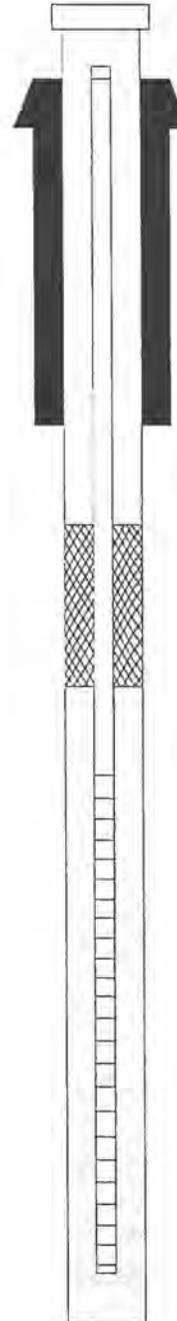
Well No. MW-1
 Date Drilled 10/1/2014
 Date Completed 10/1/2014
 Geologist MDR/MJS
 Drilling Fluids N/A

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



102.20 ft. Top of Protective Casing
 101.95 ft. Top of riser pipe
 102.20 ft. Ground surface
 Top of Annular Sealant
 101.70 ft. Sealant
 N/A Casing Stickup

101.70 ft. Top of Seal
 3.00 ft. Total Seal interval
 98.70 ft. Top of Sand
 97.70 ft. Top of Screen

Total Screen Interval
 10.0 ft.

87.70 ft. Bottom of Screen
 87.20 ft. Bottom of Borehole

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	10' ft. while drilling
Depth to Water	91.68 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	Approximately 1 gallon
Gallons removed (purge)	Approximately 1 gallon
Other	

Completed by: MJS

Illinois Environmental Protection Agency

LUST Well Completion Report

Incident No. 2014-0247
 Site Name Aman Food & Gas
 Drilling Contractor AEDC
 Driller AEDC
 Drilling Method Hollow Stem Auger

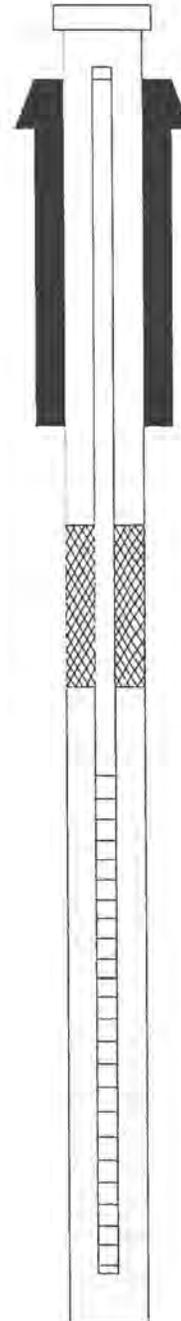
Well No. MW-2
 Date Drilled 10/1/2014
 Date Completed 10/1/2014
 Geologist MDR/MJS
 Drilling Fluids N/A

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



Top of Protective Casing 101.18 ft.
 Top of riser pipe 100.93 ft.
 Ground surface 101.18 ft.
 Top of Annular Sealant 100.68 ft.
 Casing Stickup N/A

Top of Seal 100.68 ft.
 Total Seal interval 3.00 ft.
 Top of Sand 97.68 ft.
 Top of Screen 96.68 ft.

Total Screen Interval 10.0 ft.

Bottom of Screen 86.68 ft.
 Bottom of Borehole 86.18 ft.

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	10' ft. while drilling
Depth to Water	96.07 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	Approximately 1 gallon
Gallons removed (purge)	Approximately 1 gallon
Other	

Completed by: MJS

Illinois Environmental Protection Agency

LUST Well Completion Report

Incident No. 2014-0247
 Site Name Aman Food & Gas
 Drilling Contractor AEDC
 Driller AEDC
 Drilling Method Hollow Stem Auger

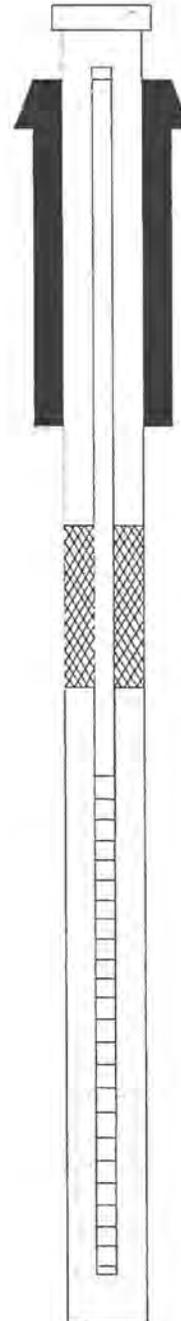
Well No. MW-3
 Date Drilled 10/1/2014
 Date Completed 10/1/2014
 Geologist MDR/MJS
 Drilling Fluids N/A

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



Top of Protective Casing 100.00 ft.
 Top of riser pipe 99.75 ft.
 Ground surface 100.00 ft.
 Top of Annular Sealant 99.50 ft.
 Casing Stickup N/A

Top of Seal 99.50 ft.
 Total Seal interval 3.00 ft.
 Top of Sand 96.50 ft.
 Top of Screen 95.50 ft.

Total Screen Interval 10.0 ft.

Bottom of Screen 85.50 ft.
 Bottom of Borehole 85.00 ft.

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	10' ft. while drilling
Depth to Water	90.87 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	Approximately 1 gallon
Gallons removed (purge)	Approximately 1 gallon
Other	

Completed by: MJS

Illinois Environmental Protection Agency

LUST Well Completion Report

Incident No. 2014-0247
 Site Name Aman Food & Gas
 Drilling Contractor AEDC
 Driller AEDC
 Drilling Method Hollow Stem Auger

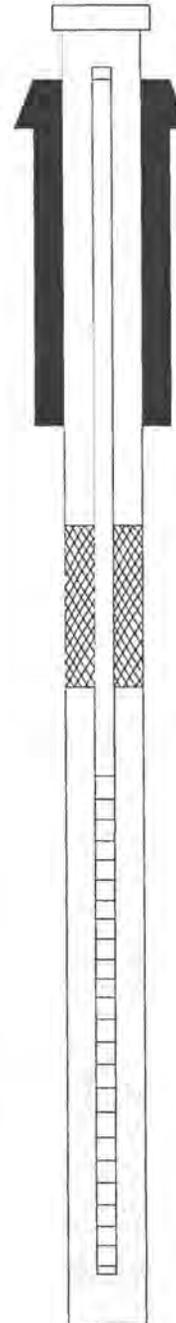
Well No. MW-4
 Date Drilled 10/1/2014
 Date Completed 10/1/2014
 Geologist MDR/MJS
 Drilling Fluids N/A

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		Sched.-40	
Screen to Riser			
Protective Casing			Steel



Top of Protective Casing 101.79 ft.
 Top of riser pipe 101.54 ft.
 Ground surface 101.79 ft.
 Top of Annular Sealant 101.29 ft.
 Casing Stickup N/A

Top of Seal 101.29 ft.
 Total Seal interval 3.00 ft.
 Top of Sand 98.29 ft.
 Top of Screen 97.29 ft.

Total Screen Interval 10.0 ft.

Bottom of Screen 87.29 ft.
 Bottom of Borehole 86.79 ft.

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	10' ft. while drilling
Depth to Water	88.36 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	Approximately 1 gallon
Gallons removed (purge)	Approximately 1 gallon
Other	

Completed by: MJS

Illinois Environmental Protection Agency

LUST Well Completion Report

Incident No. 2014-0247
 Site Name Aman Food & Gas
 Drilling Contractor AEDC
 Driller AEDC
 Drilling Method Hollow Stem Auger

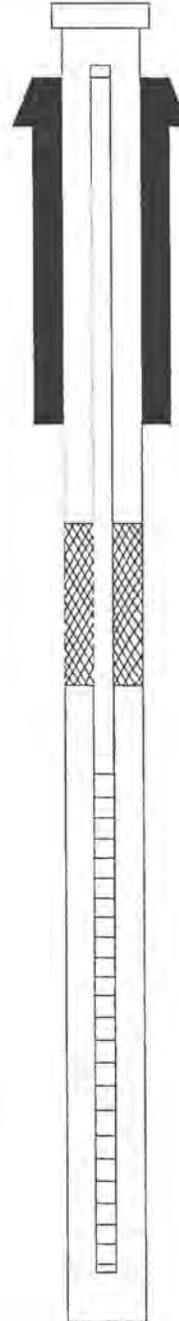
Well No. MW-5
 Date Drilled 10/1/2014
 Date Completed 10/1/2014
 Geologist MDR/MJS
 Drilling Fluids N/A

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		Sched.-40	
Screen to Riser			
Protective Casing			Steel



Top of Protective Casing 101.75 ft.
 Top of riser pipe 101.50 ft.
 Ground surface 101.75 ft.
 Top of Annular Sealant 101.25 ft.
 Casing Stickup N/A

Top of Seal 101.25 ft.
 Total Seal interval 3.00 ft.
 Top of Sand 98.25 ft.
 Top of Screen 97.25 ft.

Total Screen Interval 10.0 ft.

Bottom of Screen 87.25 ft.
 Bottom of Borehole 86.75 ft.

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	10' ft. while drilling
Depth to Water	93.03 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	Approximately 1 gallon
Gallons removed (purge)	Approximately 1 gallon
Other	

Completed by: MJS

Illinois Environmental Protection Agency

LUST Well Completion Report

Incident No. 2014-0247
 Site Name Aman Food & Gas
 Drilling Contractor AEDC
 Driller AEDC
 Drilling Method Hollow Stem Auger

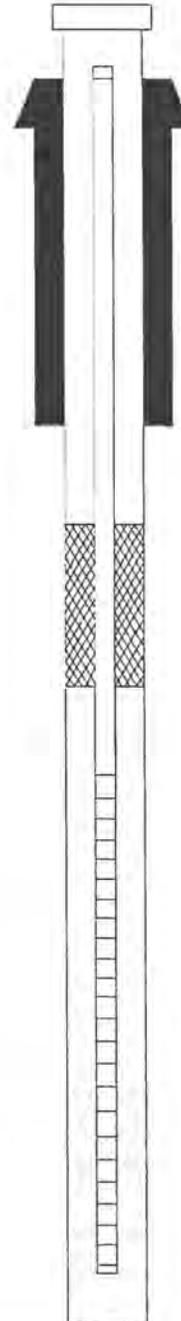
Well No. MW-6
 Date Drilled 4/19/2016
 Date Completed 4/19/2016
 Geologist MDR/MJS
 Drilling Fluids N/A

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		Sched.-40	
Screen to Riser			
Protective Casing			Steel



Top of Protective Casing 100.47 ft.
 Top of riser pipe 100.22 ft.
 Ground surface 100.47 ft.
 Top of Annular Sealant 99.97 ft.
 Casing Stickup N/A

Top of Seal 99.97 ft.
 Total Seal interval 3.00 ft.
 Top of Sand 96.97 ft.
 Top of Screen 95.97 ft.

Total Screen Interval 10.0 ft.

Bottom of Screen 85.97 ft.
 Bottom of Borehole 85.47 ft.

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	9-10' ft. while drilling
Depth to Water	93.77 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	
Gallons removed (purge)	
Other	

Completed by: MJS

Illinois Environmental Protection Agency

LUST Well Completion Report

Incident No. 2014-0247
 Site Name Aman Food & Gas
 Drilling Contractor AEDC
 Driller AEDC
 Drilling Method Hollow Stem Auger

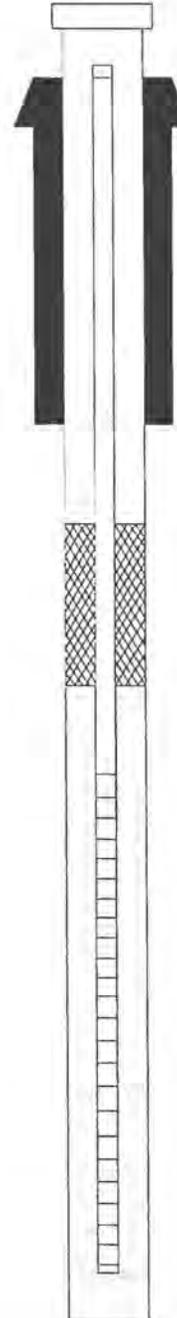
Well No. MW-7
 Date Drilled 4/19/2016
 Date Completed 4/19/2016
 Geologist MDR/MJS
 Drilling Fluids N/A

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



Top of Protective Casing 100.60 ft.
 Top of riser pipe 100.35 ft.
 Ground surface 100.60 ft.
 Top of Annular Sealant 100.10 ft.
 Casing Stickup N/A

Top of Seal 100.10 ft.
 Total Seal interval 3.00 ft.
 Top of Sand 97.10 ft.
 Top of Screen 96.10 ft.

Total Screen Interval 10.0 ft.

Bottom of Screen 86.10 ft.
 Bottom of Borehole 85.60 ft.

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	9-10' ft. while drilling
Depth to Water	94.55 ft. static
Free Product Thickness	N/A
Gallons removed (develop)	
Gallons removed (purge)	
Other	

Completed by: MJS

APPENDIX E

ANALYTICAL RESULTS

**STAGE 3 SITE INVESTIGATION PLAN AND
BUDGET
AMAN FOOD & GAS
MOLINE, ILLINOIS**

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#: 133964
Invoice Date: 5/5/2016

Terms: NET90
Invoice Due: 8/3/2016

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
Project: Aman Food and Gas

Work Order: 1604H25

Date Received: 4/26/2016

Item Description	Matrix	Remarks	Qty	Unit Price	% Disc.	Net Price	Total
BTEX + MTBE Solid	Soil	July 2014 - June 2015	5	\$103.26			\$516.30
BTEX + MTBE Water	Groundwater	July 2014 - June 2015	2	\$98.41			\$196.82
DRY BULK DENSITY	Soil	July 2014 - June 2015	1	\$26.72			\$26.72
ORGANIC MATTER & ORGANIC CAR	Soil	July 2014 - June 2015	1	\$46.16			\$46.16
PARTICLE-SIZE ANALYSIS OF SOILS	Soil	July 2014 - June 2015	1	\$176.15			\$176.15
SOIL PARTICLE DENSITY	Soil	July 2014 - June 2015	1	\$75.00			\$75.00

Miscellaneous Charge Summary

Item	Unit	Qty	Total
Shipping & Handling	\$60.74	1	\$60.74
5035 Sampling Kit	\$12.15	5	\$60.75

Sub Total: \$1,037.15
Misc. Charges: \$121.49
Surcharge: 0.00%
INVOICE Total: \$1,158.64
Pre-Paid Amount: \$0.00
Total Payable Amount: \$1,158.64

Comments: Terms per signed agreement REVISED INVOICE 5/1/16

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BY: *CR*



SUBURBAN LABORATORIES, Inc.



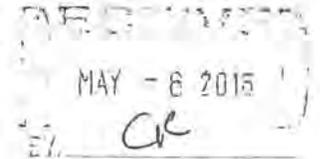
1950 S. Batavia Ave., Suite 150 Geneva, Illinois 60134
Tel. (708) 544-3260 • Toll Free (800) 783-LABS
Fax (708) 544-8587
www.suburbanlabs.com

May 05, 2016

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

TEL: (217) 522-8001
FAX: (217) 522-8009
RE: Aman Food and Gas

CONFIDENTIAL



Dear Carol Rowe:

Suburban Laboratories, Inc. received 7 sample(s) on 4/26/2016 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 including, 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,

Shane Clarke
Business Development Manager
708-544-3260 ext 217
shane@SuburbanLabs.com





Suburban Laboratories, Inc.

1950 S. Batavia Ave., Suite 150, Geneva, IL 60134 (708) 544-5200

Case Narrative

Client: CWM Company, Inc
Project: Aman Food and Gas
WorkOrder: 1604H25

Date: May 05, 2016
PO #:
QC Level:
Chain of Custody #: 132704

Temperature of samples upon receipt at SLI: 1 C

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.
- All water analyses that are required to be performed in the field (e.g., pH, residual chlorine, sulfite, temperature, etc.) but are analyzed in the lab are identified as "in lab" and are considered past holding time. Following industry practices these results do not contain an "H" flag but are qualified as being analyzed in the lab.

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
- 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

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Workorder Specific Comments:



Suburban Laboratories, Inc.

1950 S. Batavia Ave., Suite 180, Geneva, IL 60134 (708) 544-3260

Laboratory Results

Client ID: CWM Company, Inc
Project Name: Aman Food and Gas

Report Date: May 05, 2016
Workorder: 1604H25

Client Sample ID: MW-6 2.5

Matrix: SOIL

Lab ID: 1604H25-001

Date Received: 04/26/2016 9:30 AM

Collection Date: 04/19/2016 10:35 AM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method EPA-8260B-Rev 2, Dec-96			Analyst: mkl		
Benzene	ND	0.0140		mg/Kg-dry	43.83	04/27/2016 3:18 AM	R71358
Ethylbenzene	ND	0.0559		mg/Kg-dry	43.83	04/27/2016 3:18 AM	R71358
m,p-Xylene	ND	0.112		mg/Kg-dry	43.83	04/27/2016 3:18 AM	R71358
Methyl tert-butyl ether	ND	0.0559		mg/Kg-dry	43.83	04/27/2016 3:18 AM	R71358
o-Xylene	ND	0.0559		mg/Kg-dry	43.83	04/27/2016 3:18 AM	R71358
Total Xylenes	ND	0.112		mg/Kg-dry	43.83	04/27/2016 3:18 AM	R71358
Toluene	ND	0.0559		mg/Kg-dry	43.83	04/27/2016 3:18 AM	R71358
<u>Internal Quality Control Compounds</u>							
SS: 4-Bromofluorobenzene	98.7	85.9-111		%Rec	43.83	04/27/2016 3:18 AM	R71358
SS: Dibromofluoromethane	88.9	87.5-113		%Rec	43.83	04/27/2016 3:18 AM	R71358
SS: Toluene-d8	99.4	83.3-121		%Rec	43.83	04/27/2016 3:18 AM	R71358
PERCENT MOISTURE		Method ASTM-D2216-Rev 2005			Analyst: cjj		
Percent Moisture	22	1.0		wt%	1	05/02/2016 5:00 PM	R71544

Client Sample ID: MW-6 7.5

Matrix: SOIL

Lab ID: 1604H25-002

Date Received: 04/26/2016 9:30 AM

Collection Date: 04/19/2016 10:45 AM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method EPA-8260B-Rev 2, Dec-96			Analyst: mkl		
Benzene	ND	0.0136		mg/Kg-dry	42.43	04/27/2016 3:45 AM	R71358
Ethylbenzene	ND	0.0542		mg/Kg-dry	42.43	04/27/2016 3:45 AM	R71358
m,p-Xylene	ND	0.108		mg/Kg-dry	42.43	04/27/2016 3:45 AM	R71358
Methyl tert-butyl ether	ND	0.0542		mg/Kg-dry	42.43	04/27/2016 3:45 AM	R71358
o-Xylene	ND	0.0542		mg/Kg-dry	42.43	04/27/2016 3:45 AM	R71358
Total Xylenes	ND	0.108		mg/Kg-dry	42.43	04/27/2016 3:45 AM	R71358
Toluene	ND	0.0542		mg/Kg-dry	42.43	04/27/2016 3:45 AM	R71358
<u>Internal Quality Control Compounds</u>							
SS: 4-Bromofluorobenzene	97.5	85.9-111		%Rec	42.43	04/27/2016 3:45 AM	R71358
SS: Dibromofluoromethane	89.7	87.5-113		%Rec	42.43	04/27/2016 3:45 AM	R71358
SS: Toluene-d8	99.7	83.3-121		%Rec	42.43	04/27/2016 3:45 AM	R71358
PERCENT MOISTURE		Method ASTM-D2216-Rev 2005			Analyst: cjj		
Percent Moisture	22	1.0		wt%	1	05/02/2016 5:00 PM	R71544

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

Laboratory Results

Client ID: CWM Company, Inc
Project Name: Aman Food and Gas

Report Date: May 05, 2016
Workorder: 1604H25

Client Sample ID: SB-4 2.5 Matrix: SOIL
Lab ID: 1604H25-003 Date Received: 04/26/2016 9:30 AM Collection Date: 04/19/2016 12:20 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96			Analyst: mkl		
Benzene	ND	0.0141		mg/Kg-dry	43.87	04/27/2016 4:12 AM	R71358
Ethylbenzene	ND	0.0566		mg/Kg-dry	43.87	04/27/2016 4:12 AM	R71358
m,p-Xylene	ND	0.113		mg/Kg-dry	43.87	04/27/2016 4:12 AM	R71358
Methyl tert-butyl ether	ND	0.0566		mg/Kg-dry	43.87	04/27/2016 4:12 AM	R71358
o-Xylene	ND	0.0566		mg/Kg-dry	43.87	04/27/2016 4:12 AM	R71358
Total Xylenes	ND	0.113		mg/Kg-dry	43.87	04/27/2016 4:12 AM	R71358
Toluene	ND	0.0566		mg/Kg-dry	43.87	04/27/2016 4:12 AM	R71358
<u>Internal Quality Control Compounds</u>							
SS: 4-Bromofluorobenzene	98.3	85.9-111		%Rec	43.87	04/27/2016 4:12 AM	R71358
SS: Dibromofluoromethane	88.0	87.5-113		%Rec	43.87	04/27/2016 4:12 AM	R71358
SS: Toluene-d8	99.5	83.3-121		%Rec	43.87	04/27/2016 4:12 AM	R71358
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005			Analyst: cjq		
Percent Moisture	22	1.0		wt%	1	05/02/2016 5:00 PM	R71544

Client Sample ID: SB-4 7.5 Matrix: SOIL
Lab ID: 1604H25-004 Date Received: 04/26/2016 9:30 AM Collection Date: 04/19/2016 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: mkl		
Benzene	ND	0.0164		mg/Kg-dry	51.29	04/27/2016 4:39 AM	R71358
Ethylbenzene	ND	0.0656		mg/Kg-dry	51.29	04/27/2016 4:39 AM	R71358
m,p-Xylene	ND	0.131		mg/Kg-dry	51.29	04/27/2016 4:39 AM	R71358
Methyl tert-butyl ether	ND	0.0656		mg/Kg-dry	51.29	04/27/2016 4:39 AM	R71358
o-Xylene	ND	0.0656		mg/Kg-dry	51.29	04/27/2016 4:39 AM	R71358
Total Xylenes	ND	0.131		mg/Kg-dry	51.29	04/27/2016 4:39 AM	R71358
Toluene	ND	0.0656		mg/Kg-dry	51.29	04/27/2016 4:39 AM	R71358
<u>Internal Quality Control Compounds</u>							
SS: 4-Bromofluorobenzene	98.4	85.9-111		%Rec	51.29	04/27/2016 4:39 AM	R71358
SS: Dibromofluoromethane	87.3	87.5-113		%Rec	51.29	04/27/2016 4:39 AM	R71358
SS: Toluene-d8	99.6	83.3-121		%Rec	51.29	04/27/2016 4:39 AM	R71358
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005			Analyst: cjq		
Percent Moisture	22	1.0		wt%	1	05/02/2016 5:00 PM	R71544

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 1950 S. Batavia Ave., Suite 150, Geneva, IL 60134 (708) 544-3300

Laboratory Results

Client ID: CWM Company, Inc
 Project Name: Aman Food and Gas

Report Date: May 05, 2016
 Workorder: 1604H25

Client Sample ID: TACO Matrix: SOIL
 Lab ID: 1604H25-005 Date Received: 04/26/2016 9:30 AM Collection Date: 04/19/2016 12:10 PM

Parameter	Result	Report Limit	Qual.	Units	Dilution Factor	Date Analyzed	Batch ID
VOLATILE ORGANIC COMPOUNDS		Method: EPA-8260B-Rev 2, Dec-96			Analyst: rki		
Benzene	ND	0.0127		mg/Kg-dry	41.61	04/27/2016 5:06 AM	R71358
Ethylbenzene	ND	0.0508		mg/Kg-dry	41.61	04/27/2016 5:06 AM	R71358
m,p-Xylene	ND	0.102		mg/Kg-dry	41.61	04/27/2016 5:06 AM	R71358
Methyl tert-butyl ether	ND	0.0508		mg/Kg-dry	41.61	04/27/2016 5:06 AM	R71358
o-Xylene	ND	0.0508		mg/Kg-dry	41.61	04/27/2016 5:06 AM	R71358
Total Xylenes	ND	0.102		mg/Kg-dry	41.61	04/27/2016 5:06 AM	R71358
Toluene	ND	0.0508		mg/Kg-dry	41.61	04/27/2016 5:06 AM	R71358
<u>Internal Quality Control Compounds</u>							
SS: 4-Bromofluorobenzene	98.0	85.9-111		%Rec	41.61	04/27/2016 5:06 AM	R71358
SS: Dibromofluoromethane	87.0	87.5-113		%Rec	41.61	04/27/2016 5:06 AM	R71358
SS: Toluene-d8	99.2	83.3-121		%Rec	41.61	04/27/2016 5:06 AM	R71358
DRY BULK DENSITY		Method: ASTM-D2937-Rev 2004			Analyst: cjj		
Soil Bulk Density (Pb)	1.807	0	c	g/cm ³	1	04/26/2016 3:37 PM	R71303
ORGANIC MATTER & ORGANIC CARBON CONTENT		Method: ASTM-D2974-Rev 2000			Analyst: cjj		
FOM-Organic Matter (@ 440 C)	0.00770	0.00100		g/g	1	04/26/2016 4:22 PM	R71310
FOC-Organic Carbon (0.58 Factor)	0.00450	0.00100		g/g	1	04/26/2016 4:22 PM	R71310
PARTICLE-SIZE ANALYSIS OF SOILS		Method: ASTM-D422-Rev 1963			Analyst: cjj		
Hydrometer	Complete	0	c		1	05/05/2016 1:09 PM	R71654
Particle Density	Complete	0	c		1	05/05/2016 1:09 PM	R71654
Sieve Analysis	Complete	0	c		1	05/05/2016 1:09 PM	R71654
SOIL PARTICLE DENSITY		Method: ASTM-D854-Rev 2000			Analyst: cjj		
Soil Particle Density (Ps)	2.637	0	c	g/cm ³	1	04/27/2016 12:33 PM	R71339
PERCENT MOISTURE		Method: ASTM-D2216-Rev 2005			Analyst: cjj		
Percent Moisture	18	1.0		wt%	1	04/26/2016 4:22 PM	R71310

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Suburban Laboratories, Inc.
1950 S. Batavia Ave., Suite 150, Geneva, IL 60134 (708) 544-3200

PREP DATES REPORT

Client: CWM Company, Inc
Project: Aman Food and Gas

Report Date: May 05, 2016
Lab Order: 1604H25

Sample ID	Collection Date	Batch ID	Prep Method	Prep Test Name	TCLP Date	Prep Date
1504H25-001A	4/19/2016 10:35:00 A	35834	5035PR	CLOSED SYSTEM P&T VOC Prep		4/26/2016
1504H25-002A	4/19/2016 10:45:00 A	35834	5035PR	CLOSED SYSTEM P&T VOC Prep		4/26/2016
1604H25-003A	4/19/2016 12:20:00 P	35834	5035PR	CLOSED SYSTEM P&T VOC Prep		4/26/2016
1604H25-004A	4/19/2016 12:25:00 P	35834	5035PR	CLOSED SYSTEM P&T VOC Prep		4/26/2016
1504H25-005A	4/19/2016 12:10:00 P	35834	5035PR	CLOSED SYSTEM P&T VOC Prep		4/26/2016

MAY - 6 2016
AK



Suburban Laboratories, Inc.

1930 S. Batavia Ave., Suite 150, Geneva, IL 60134 (708) 544-3260

Qualifier Definitions

WO#: 16041125

Date: 5/5/2016

Qualifiers:

- *X Value exceeds Maximum Contaminant Level
- B Analyte detected in the associated Method Blank
- C Value is below Minimum Concentration Limit
- 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
- Q Accreditation is not available from Wisconsin
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- T Analyte detected in sample trip blank

MAY - 6 2016
CR



SUBURBAN LABORATORIES, Inc.
 1950 S Batavia Ave Ste. 150 Geneva, Illinois 60134
 Tel. (708) 544-3260 · Toll Free (800) 783-LABS · Fax (708) 544-8587
 www.suburbanlabs.com



SLI Work Order: 1604H25
 SLI Sample ID: 1604H25-005C

Analysis Date: 5/2/2016

Standard Test Method for Particle-Size Analysis of Soil

Sieve (U.S.)	Sieve Opening (mm)	Percent Retained
		1604H25-005C
1-1/2"	38.1	0.00%
1"	25.4	0.00%
0.75"	19.1	0.0%
No. 4	4.75	0.0%
No. 10	2.00	1.5%
No. 20	0.85	0.7%
No. 40	0.420	0.7%
No. 60	0.250	1.8%
No. 140	0.106	2.9%
No. 200	0.075	2.0%

Particle(s)	Particle Size (mm)	Percent Present
		1604H25-005C
Gravel	>4.75	0.0%
Sand, Course	4.74-2.0	1.5%
Sand, Medium	1.99-0.420	1.3%
Sand, Fine	0.419-0.075	6.7%
Silt	0.074-0.005	83.3%
Clay	<0.005-0.001	3.1%
Colloids	<0.001	4.0%

Analyst: _____

Digitally signed by Coby Gura
 DN: CN = Coby Gura, C = US
 Reason: I am the author of this document
 Date: 2016.05.05 13:07:18 -0507

Date: 5/5/2016

Reviewed: _____

Digitally signed by
 Deborah Connel
 DN: CN = Deborah
 Reason: I have reviewed
 this document
 Date: 2016.05.05
 14:21:41 -0507

Date: _____

MAY - 6 2016
 CR



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www.suburbanlabs.com

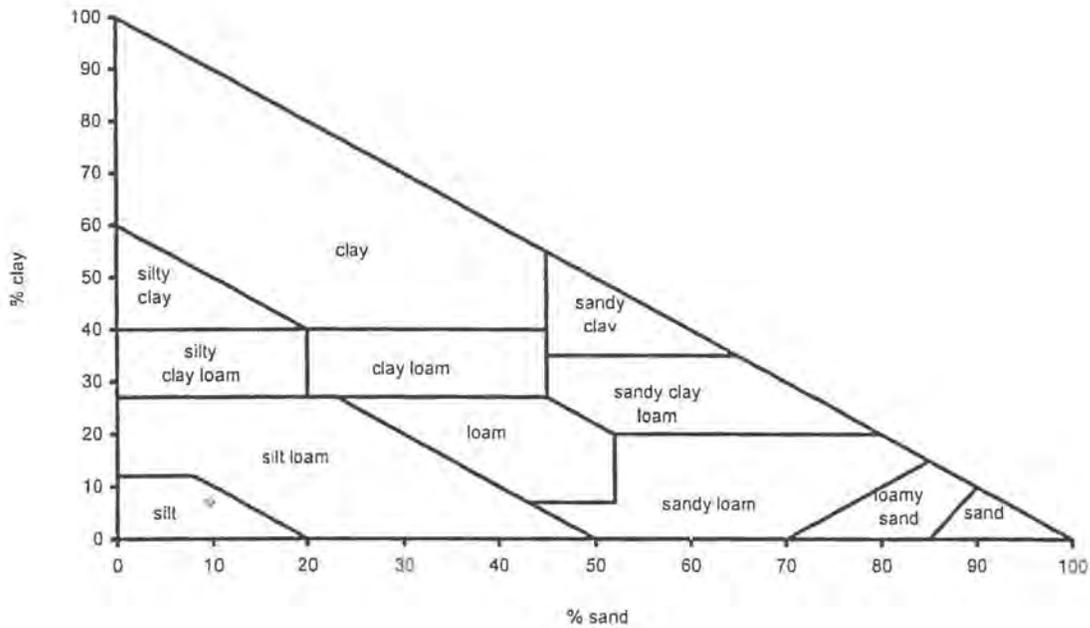


SLI Work Order: 1604H25
SLI Sample ID: 1604H25-005C

Analysis Date: 5/4/2016

% SAND	% CLAY	% SILT
9.6	7.1	83.32

Soil Classification: Silt



Textural triangle by A. Gerakis and B. Baer, 26 July 2000

MAY - 6 2016
cl



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.

Leaking Underground Storage Tank Program Laboratory Certification for Physical Soil Analysis

RECEIVED
MAY - 9 2016
BY: OR

A. Site Identification

IEMA Incident # (6- or 8-digit): 2014-0247 IIEPA LPC# (10-digit): 1610455194
Site Name: Aman Food & Gas
Site Address (Not a P.O. Box): 1830 5th Ave
City: Moline County: _____ ZIP Code: 61265
Leaking UST Technical File

B. Sample Collector

I certify that:

1. Samples were collected using ASTM procedures.
2. Chain-of-custody procedures were followed in the field.
3. Sample integrity was maintained by proper preservation.
4. All samples were properly labeled.

MR
(Initial)
MR
(Initial)
MR
(Initial)
MR
(Initial)

C. Laboratory Representative

I certify that:

1. Proper chain-of-custody procedures were followed as documented on the chain-of-custody forms
2. Sample integrity was maintained by proper preservation.
3. All samples were properly labeled.
4. Quality assurance/quality control procedures were established and carried out.
5. The test methods specified in the ASTM Standard D 422-63 or or D 1140-54 were used for particle size analysis.

SL
(Initial)
SL
(Initial)
SL
(Initial)
SL
(Initial)
SL
(Initial)

- 6. The test methods specified in ASTM Standards D 2216-90 or D 4643-87 were used for soil moisture content. GR
(Initial)
- 7. The test methods specified in ASTM Standards D 2487-90 or D 2488-90 were used for soil classification. GR
(Initial)
- 8. The test methods specified in ASTM Standards D 5084-90 or D 4525-90 were used for hydraulic conductivity. GR
(Initial)

D. Signatures

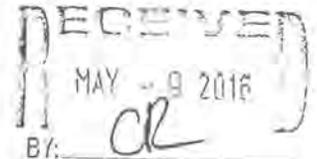
I hereby affirm that all information contained in this form is true and accurate to the best of my knowledge and belief. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sample Collector

Name Matt Rives
Title Engineer
Company CWM Company, Inc.
Address 701 W. South Grand Ave.
City Springfield
State IL
Zip Code 62704
Phone (217) 522-8001
Signature [Signature]
Date 4/20/16

Laboratory Representative

Name Shane Clarke
Title Project Manager
Company Suburban Laboratories
Address 1950 S. Batavia Ave - Suite 150
City Geneva
State IL
Zip Code 60134
Phone 708-544-3260
Signature [Signature]
Date 5/5/16





Illinois Environmental Protection Agency

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Leaking Underground Storage Tank Program Laboratory Certification for Chemical Analysis

RECEIVED
MAY - 9 2016
BY: CR

A. Site Identification

IEMA Incident # (6- or 8-digit): 2014-0247 IEPA LPC# (10-digit): 1610455194
Site Name: Aman Food & Gas
Site Address (Not a P.O. Box): 1830 5th Ave
City: Moline County: _____ ZIP Code: 61265
Leaking UST Technical File

B. Sample Collector

I certify that:

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

MR
(Initial)
MR
(Initial)
MR
(Initial)
MR
(Initial)

C. Laboratory Representative

I certify that:

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

SL
(Initial)
SL
(Initial)
SL
(Initial)
SL
(Initial)

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

GC
(Initial)
GC
(Initial)

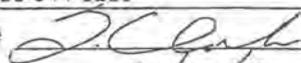
D. Signatures

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 Matthew Rives
Title Engineer
Company CWM Company, Inc.
Address 701 South Grand Ave. West
City Springfield
State IL
Zip Code 62704
Phone 217-522-8001
Signature 
Date 4-20-16

Laboratory Representative

Name Shane Clarke
Title Project Manager
Company Suburban Laboratories, Inc.
Address 1950 S. Batavia Ave., Suite 150
City Geneva
State IL
Zip Code 60134
Phone 708-544-3260
Signature 
Date 5/5/16

RECEIVED
MAY - 9 2016
BY: CR

APPENDIX F

SITE INVESTIGATION BUDGETS AND CERTIFICATIONS

STAGE 3 SITE INVESTIGATION PLAN AND BUDGET AMAN FOOD & GAS MOLINE, ILLINOIS



Illinois Environmental Protection Agency

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General Information for the Budget and Billing Forms

LPC #: 1610455194 County: Rock Island

City: Moline Site Name: Aman Food & Gas

Site Address: 1830 5th Avenue

IEMA Incident No.: 2014-0247

IEMA Notification Date: Mar 3, 2014

Date this form was prepared: Jun 22, 2016

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): _____

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JUL 29 2016

IEPA/BOL

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

35 III. Adm. Code 734:

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

35 III. Adm. Code 732:

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

35 III. Adm. Code 731:

- Site Investigation
- Corrective Action

IL 532 -2825
LPC 630 Rev. 1/2007

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: Balbir Kaur

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.)

BALBIR KAUR

W-9 must be submitted.
[Click here to print off a W-9 Form.](#)

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

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: 5 (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: 2003-0936 2014-0247

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	5,000	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	2014-0247	Overfill
Gasoline	3,000	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	2014-0247	Overfill
Gasoline	4,000	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	2014-0247	Overfill
Gasoline	4,000	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
Gasoline	6,000	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
		Yes <input type="checkbox"/> No <input type="checkbox"/>		
		Yes <input type="checkbox"/> No <input type="checkbox"/>		
		Yes <input type="checkbox"/> No <input type="checkbox"/>		
		Yes <input type="checkbox"/> No <input type="checkbox"/>		

Add More Rows

Undo Last Add

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 2014-0247. 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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JUL 29 2016
IEPA/BOL

Owner/Operator: Aman Food & Gas

Authorized Representative: Balbir Kaur

Title: Owner

Signature: BALBIR KAUR

Date: 6-12-16

Subscribed and sworn to before me the 12th day of June

[Signature]
(Notary Public)

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

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

L.P.E./L.P.G. Seal: [Signature]

L.P.E./L.P.G. Signature: [Signature]

Date: 7/22/2016

Subscribed and sworn to before me the 22nd day of July

[Signature]
(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.

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	Proposed	
Drilling and Monitoring Well Costs Form	\$	\$	\$ 2,472.21	\$ 2,497.10	\$
Analytical Costs Form	\$	\$	\$ 1,282.15	\$ 265.32	\$
Remediation and Disposal Costs Form	\$	\$	\$ 619.58	\$ 625.76	\$
UST Removal and Abandonment Costs Form	\$	\$	\$	\$	\$
Paving, Demolition, and Well Abandonment Costs Form	\$	\$	\$	\$	\$
Consulting Personnel Costs Form	\$	\$	\$ 18,697.77	\$ 35,822.81	\$
Consultant's Materials Costs Form	\$	\$	\$ 1,138.50	\$ 1,281.00	\$
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	\$	\$	\$ 24,210.21	\$ 40,491.99	\$

STAGE 2 ACTUAL COSTS

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	10.00	10.00	Soil Plume Delineation
1	HSA	15.00	15.00	Soil and Groundwater Plume Delineations
1	HSA	15.00	15.00	Groundwater Plume Delineation
1	PUSH	10.00	10.00	Tier 2 Analysis TACO Sample

Subpart H minimum payment amount applies.

	Total Feet	Rate per Foot (\$)	Total Cost (\$)
Total Feet via HSA:	✓ 30.00	27.94 28.50	855.00
Total Feet via PUSH:	✓ 20.00	21.87 22.30	446.00
Total Feet for Injection via PUSH:		18.59	
Total Drilling Costs:			1,858.71

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 (\$)
2	HSA	2.00	15.00	30.00

Well Installation	Total Feet	Rate per Foot (\$)	Total Cost (\$)
Total Feet via HSA:	✓ 30.00	20.45	613.50
Total Feet via PUSH:		15.49	
Total Feet of 4" or 6" Recovery:		30.98	
Total Feet of 8" or Greater Recovery:		50.80	
Total Well Costs:			613.50

Total Drilling and Monitoring Well Costs:	\$2,472.21
--	-------------------

Analytical Costs Form

Laboratory Analysis	Number of Samples		Cost (\$) per Analysis		Total per Parameter
Chemical Analysis					
			103.26		
BETX Soil with MTBE EPA 8260	5	X	105.33	=	\$526.65
BETX Water with MTBE EPA 8260	2	X	100.37	=	\$200.74
COD (Chemical Oxygen Demand)		X	98.41	=	
Corrosivity		X		=	
Flash Point or Ignitability Analysis EPA 1010		X		=	
Fraction Organic Carbon Content (f _{OC}) ASTM-D 2974-00	1	X	47.08	=	\$47.08
Fat, Oil, & Grease (FOG)		X	46.16	=	
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					
			26.72		
Soil Bulk Density (p _B) ASTM D2937-94	1	X	27.26	=	\$27.26
Ex-situ Hydraulic Conductivity / Permeability		X	14.58	=	
Moisture Content (w) ASTM D2216-92 / D4643-93	1	X	44.87	=	\$14.87
Porosity		X		=	
Rock Hydraulic Conductivity Ex-situ		X	176.15	=	
Sieve / Particle Size Analysis ASTM D422-63 / D1140-54	1	X	179.68	=	\$179.68
Soil Classification ASTM D2488-90 / D2487-90		X		=	
Soil Particle Density (p _S) ASTM D854-92	1	X	100.00	=	\$100.00
		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			12.15		
EnCore® Sampler, purge-and-trap sampler, or equivalent sampling device	5	X	12.39	=	\$61.95
Sample Shipping per sampling event ¹	2	X	61.96	=	\$123.92

¹A sampling event, at a minimum, is all samples (soil and groundwater) collected in a calendar day. 60.74

Total Analytical Costs: \$ 1,282.15

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 (\$)
2	309.79	619.58
		607.42
Number of Drums of Liquid Waste	Cost per Drum (\$)	Total Cost (\$)
Total Drum Disposal Costs		619.58

Total Remediation and Disposal Costs:	\$619.58
--	-----------------

Consulting Personnel Costs Form

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Senior Project Manager	5.00	123.91	\$619.55
Stage 2-Field	Field Preparation, Scheduling, Arrangements/Coordination for Investigation Activities			
	Engineer I	12.00	92.93	\$1,115.16
Stage 2-Field	Drilling/ Soil Sampling / Performing Slug Test			
	Engineer III / PG	16.00	123.91	\$1,982.56
Stage 2-Field	Drilling/ Soil Sampling / Performing Slug Test / Field Prep / Mobilization / Drilling Plan			
	Engineer III / Eng I	10.00	123.91	\$1,239.10
Stage 2-Field	Groundwater Sampling, Surveying			
	Senior Project Manager / PG	10.00	123.91	\$1,239.10
Stage 2-Field	Groundwater Sampling, Surveying			
	Senior Project Manager	6.00	123.91	\$743.46
Stage 2-Field	Evaluate Analytical Results, Borelogs, and Well Completion Reports / SI Documentation			
	Engineer I	8.00	92.93	\$743.44
Stage 2-Field	Record Borelogs, Record Well Completion Reports, and Tabulation of Analytical Results			
	Draftperson/CAD III	5.00	61.96	\$309.80
Stage 2-Field	Field Prep Maps / Drafting for Field Activities			
	Senior Admin. Assistant	2.00	55.76	\$111.52
Stage 2-Field	Arrangements for Investigation, Utilities/JULIE, and Scheduling			

Electronic Filing: Received, Clerk's Office 4/5/2017

Employee Name		Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task				
		Senior Project Manager	6.00	-123.91	\$743.46
Stage 2-Plan	Site Investigation Plan Development Oversight/Review				121.49
		Senior Prof. Engineer	3.00	-161.09	\$483.27
Stage 2-Plan	Stage 2 Plan Certification				157.94
		Engineer I	26.00	-92.93	\$2,416.18
Stage 2-Plan	Stage 2 Plan Inputs				31.11
		Draftperson/CAD III	✓ 5.00	-61.96	\$309.80
Stage 2-Plan	Drafting/Editing of Maps				63.74
		Engineer III	✓ 3.00	-123.91	\$371.73
Stage 2-Plan	Stage 2 Plan Development / Drill Plan				121.49
		Engineer III	-6.00-	-123.91	\$743.46
Stage 2-Field	Drilling Plan/ Field Prep/ Mobilization				4 121.49
		Senior Project Manager	6.00	-123.91	\$743.46
Stage 2-Budget	Stage 2 Budget Technical Compliance and Oversight				121.49
		Senior Prof. Engineer	2.00	-161.09	\$322.18
Stage 2-Budget	Stage 2 Budget Certification				157.94

Electronic Filing: Received, Clerk's Office 4/5/2017

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Engineer I	8.00	92.93	\$743.44
Stage 2-Budget	Stage 2 Budget Calculations and Inputs			91.11
	Senior Admin. Assistant	2.00	55.76	\$111.52
Stage 2-Budget	Stage 2 Budget Compilation, Assembly, and Distribution			54.67
	Senior Project Manager	10.00	123.91	\$1,239.10
Stage 2-Pay	Stage 2 Reimbursement Coordination / Oversight and Technical Compliance			121.49
	Senior Prof. Engineer	4.00	161.09	\$644.36
Stage 2-Pay	Stage 2 Reimbursement Certification			157.94
	Senior Acct. Technician	22.00	68.14	\$1,499.08
Stage 2-Pay	Stage 2 Reimbursement Preparation			66.81
	Senior Admin. Assistant	4.00	55.76	\$223.04
Stage 2-Pay	Stage 2 Reimbursement Compilation, Assembly, and Distribution			54.67

*Refer to the applicable Maximum Payment Amounts document.

Total of Consulting Personnel Costs	\$18,697.77
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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	148.00	/day	\$148.00
Stage 2-Field	Detect VOC Levels in Soil Samples 129.00				
Measuring Wheel		1.00	21.00	/day	\$21.00
Stage 2-Field	Mapping Sampling Locations 18.00				
Disposable Gloves		1.00	13.00	/box	\$13.00
Stage 2-Field	Disposable Latex Gloves for Soil Sampling, Groundwater Sampling				
Mileage	<i>165 x 2 = 330 x 2 = 660 miles</i>	680.00	.65	/mile	\$442.00
Stage 2-Field	2 Round Trip from Springfield Office to Site (Drilling/Sampling - Groundwater Sampling)				
Water Level Indicator		2.00	28.00	/day	\$56.00
Stage 2-Field	Measure Groundwater Levels During Drilling / Slug Test, Groundwater Sampling				
Survey Equipment Rental		1.00	86.00	/day	\$86.00
Stage 2-Field	Survey monitoring well elevations for groundwater flow calculations				
Copies		500.00	.15	/copy	\$75.00
Stage 2-Plan	Copies/Drafts/Forms of Stage 2 Plan / IEPA Correspondences				
Postage		2.00	6.00	/each	\$12.00
Stage 2-Plan	Stage 2 Report/Forms Distribution				
Copies		200.00	.15	/copy	\$30.00
Stage 2-Budget	Copies of Stage 2 Budget/Draft				

Electronic Filing: Received, Clerk's Office 4/5/2017

Materials, Equipment, or Field Purchase	Time or Amount Used	Rate (\$)	Unit	Total Cost
Remediation Category	Description/Justification			
Postage	2.00	6.00	/each	\$12.00
Stage 2-Budget	Stage 2 Budget/Forms Distribution			
Copies	800.00	.15	/copy	\$120.00
Stage 2-Pay	Copies of Stage 2 Reimbursement Request/Supporting Documentation			
Postage	2.00	6.00	/each	\$12.00
Stage 2-Pay	Stage 2 Forms and Reimbursement Distribution			
Copies	100.00 250.00	.15	/copy	\$37.50
Stage 2-Field	Field Preparation/Maps/Borelogs/Analytical Reports/Field Reports			
Bailers	2.00	13.00 16.00	/each	\$32.00
Stage 2-Field	Disposable Bailers for Monitoring Well Development and Sampling			
Bailing Twine	1.00	5.00 6.00	/roll	\$6.00
Stage 2-Field	String for Bailers, Well Development, and Sampling			
Slug Test	1.00	36.00	/day	\$36.00
Stage 2-Field	Materials Used to Perform Slug Test			
Total of Consultant Materials Costs				\$1,138.50

STAGE 3 PROPOSED COSTS

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
2	HSA	✓ 15.00	30.00	Groundwater Plume Delineation

Subpart H minimum payment amount applies.

	Total Feet	Rate per Foot (\$)	Total Cost (\$)
Total Feet via HSA:	30.00	✓ 28.79	863.70
Total Feet via PUSH:		22.53	
Total Feet for Injection via PUSH:		18.77	
Total Drilling Costs:			1,877.30

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 (\$)
2	HSA	2.00	✓ 15.00	30.00

Well Installation	Total Feet	Rate per Foot (\$)	Total Cost (\$)
Total Feet via HSA:	✓ 30.00	✓ 20.66	619.80
Total Feet via PUSH:		15.64	
Total Feet of 4" or 6" Recovery:		31.29	
Total Feet of 8" or Greater Recovery:		51.31	
Total Well Costs:			619.80

Total Drilling and Monitoring Well Costs:	\$2,497.10
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Analytical Costs Form

Laboratory Analysis	Number of Samples		Cost (\$) per Analysis		Total per Parameter
Chemical Analysis					
BETX Soil with MTBE EPA 8260		X		=	
BETX Water with MTBE EPA 8260	2	X	✓ 101.37	=	\$202.74
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		=	
		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		X		=	
Sample Shipping per sampling event ¹	1	X	✓ 62.58	=	\$62.58

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

Total Analytical Costs: \$ 265.32

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 (\$)
2	312.88	625.76
Number of Drums of Liquid Waste	Cost per Drum (\$)	Total Cost (\$)
Total Drum Disposal Costs		625.76

Total Remediation and Disposal Costs:	\$625.76
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Consulting Personnel Costs Form

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Senior Project Manager	8.00	✓ 125.15	\$1,001.20
Stage 3-Field	Field Preparation, Scheduling, Arrangements/Coordination for Investigation Activities with Off-Site			
	Engineer II	10.00	✓ 106.38	\$1,063.80
Stage 3-Field	Off-site Drilling			
	Engineer III	12.00	✓ 125.15	\$1,501.80
Stage 3-Field	Off-site Drilling			
	Senior Project Manager	6.00	✓ 125.15	\$750.90
Stage 3-Field	Site Investigation Oversight and Documentation			
	Senior Admin. Assistant	4.00	✓ 56.32	\$225.28
Stage 3-Field	Arrangements for Investigation, Utilities/JULIE, and Scheduling			
	Senior Project Manager	6.00	✓ 125.15	\$750.90
Stage 3-Field	Evaluate Analytical Results, Borelogs, and Well Completion Reports			
	Engineer II	8.00	✓ 106.38	\$851.04
Stage 3-Field	Record Borelogs, Record Well Completion Reports, and Tabulation of Analytical Results			
	Engineer III	10.00	✓ 125.15	\$1,251.50
Stage 3-Field	Groundwater Sampling/Surveying			
	Engineer II	10.00	✓ 106.38	\$1,063.80
Stage 3-Field	Groundwater Sampling/Surveying			

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Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Geologist III	3.00	✓ 110.13	\$330.39
Stage 3-Field	Groundwater Flow Direction Calculations / Mapping			
	Senior Project Manager	4.00	✓ 125.15	\$500.60
Stage 3-Field	Site Investigation Documentation / Field Reports			
	Engineer II	32.00	✓ 106.38	\$3,404.16
Stage 3-Plan	Stage 3 Plan Preparation and Design			
	Draftperson/CAD I	6.00	✓ 50.06	\$300.36
Stage 3-Plan	Drafting/Editing of Maps for Report			
	Senior Admin. Assistant	3.00	✓ 56.32	\$168.96
Stage 3-Plan	Stage 3 Plan Compilation, Assembly, and Distribution			
	Engineer III	10.00	✓ 125.15	\$1,251.50
Stage 3-Plan	Stage 3 Plan Development / Drill Plan			
	Senior Project Manager	6.00	✓ 125.10	\$750.60
Stage 3-Plan	Site Investigation Plan Development Oversight/Review			
	Senior Prof. Engineer	3.00	✓ 162.70	\$488.10
Stage 3-Plan	Stage 3 Plan Certification			
	Senior Prof. Engineer	3.00	✓ 162.70	\$488.10
Stage 3-Budget	Stage 3 Budget Certification			

Electronic Filing: Received, Clerk's Office 4/5/2017

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Engineer II	18.00	✓ 106.38	\$1,914.84
Stage 3-Budget	Stage 3 Budget Calculations and Inputs			
	Senior Admin. Assistant	2.00	✓ 56.32	\$112.64
Stage 3-Budget	Stage 3 Budget Compilation, Assembly, and Distribution			
	Engineer III	6.00	✓ 125.15	\$750.90
Stage 3-Budget	Stage 3 Budget Development			
	Senior Project Manager	8.00	✓ 125.15	\$1,001.20
Stage 3-Budget	Stage 3 Budget Technical Compliance and Oversight			
	Senior Project Manager	12.00	✓ 125.15	\$1,501.80
Stage 3-Pay	Stage 3 Reimbursement Coordination / Oversight and Technical Compliance			
	Senior Prof. Engineer	4.00	✓ 162.70	\$650.80
Stage 3-Pay	Stage 3 Reimbursement Certification			
	Senior Acct. Technician	25.00	✓ 68.83	\$1,720.75
Stage 3-Pay	Stage 3 Reimbursement Preparation			
	Senior Admin. Assistant	4.00	✓ 56.32	\$225.28
Stage 3-Pay	Stage 3 Reimbursement Compilation, Assembly, and Distribution			

Electronic Filing: Received, Clerk's Office 4/5/2017

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Senior Project Manager	6.00	✓ 125.15	\$750.90
SICR	SICR Technical Compliance/Oversight			
	Senior Prof. Engineer	4.00	✓ 162.70	\$650.80
SICR	SICR Certification			
	Engineer III	45.00	✓ 125.15	\$5,631.75
SICR	SICR Development			
	Senior Admin. Assistant	6.00	✓ 56.32	\$337.92
SICR	SICR Compilation, Assembly, and Distribution			
	Senior Draftperson/CAD	10.00	✓ 75.08	\$750.80
SICR	Drafting/Editing Maps for the SICR			

*Refer to the applicable Maximum Payment Amounts document.

Total of Consulting Personnel Costs	\$35,822.81
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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	148.00	/day	\$148.00
Stage 3-Field	Detect VOC Levels in Samples				
Measuring Wheel		1.00	21.00	/day	\$21.00
Stage 3-Field	Mapping Sampling Locations				
Mileage <i>(167 miles x 2 = 334 miles)</i>		680.00	.65	/mile	\$442.00
Stage 3-Field	2 Round Trips from Springfield Office to Site (Drilling, GW Sampling)				
Disposable Gloves		1.00	16.00	/box	\$16.00
Stage 3-Field	Disposable Latex Gloves for Groundwater Sampling				
Water Level Indicator		2.00	28.00	/day	\$56.00
Stage 3-Field	Determining Depth to Groundwater While Drilling / Measure Static GW Elevations				
Copies		600.00	.15	/copy	\$90.00
Stage 3-Plan	Copies/Drafts/Forms of Stage 3 Plan / IEPA Correspondences				
Postage		2.00	6.00	/each	\$12.00
Stage 3-Plan	Stage 3 Report/Forms/Draft Distribution				
Copies		400.00	.15	/copy	\$60.00
Stage 3-Budget	Copies of Stage 3 Budget/Draft/Forms				

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31, # 30

31, # 30

Electronic Filing: Received, Clerk's Office 4/5/2017

Materials, Equipment, or Field Purchase	Time or Amount Used	Rate (\$)	Unit	Total Cost
Remediation Category	Description/Justification			
Postage	2.00	6.00	/each	\$12.00
Stage 3-Budget	Stage 3 Budget/Draft/Forms Distribution			
Copies	600.00	.15	/copy	\$90.00
Stage 3-Pay	Copies of Stage 3 Reimbursement Draft/Request/Supporting Documentation			
Postage	2.00	6.00	/each	\$12.00
Stage 3-Pay	Stage 3 Forms/Draft and Reimbursement Distribution			
Copies	150.00	.15	/copy	\$22.50
Stage 3-Field	Field Preparation/Maps/Borelogs/Analytical Reports/Field Reports			
Survey Equipment Rental	1.00	86.00	/day	\$86.00
Stage 3-Field	Survey monitoring well elevations for groundwater flow calculations			
Bailers	2.00	16.00	/each	\$32.00
Stage 3-Field	Disposable Bailers for monitoring well development and sampling			
Bailing Twine	1.00	6.00	/roll	\$6.00
Stage 3-Field	String for Bailers			
Copies	600.00	.15	/each	\$90.00
SICR	Copies of SICR Draft/Forms and Attachments			
Postage	2.00	6.00	/day	\$12.00
SICR	SICR Draft/Forms/Distribution			

31, # 30

31, # 30

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31, # 30

APPENDIX C

ILLINOIS OFFICE OF THE STATE FIRE MARSHAL ELIGIBILITY DETERMINATION

**STAGE 3 SITE INVESTIGATION PLAN AND
BUDGET
AMAN FOOD & GAS
MOLINE, ILLINOIS**



Office of the Illinois
State Fire Marshal

"Partnering With the Fire Service to Protect Illinois"

CERTIFIED MAIL - RECEIPT REQUESTED #7014 1820 0001 3148 5009

January 8, 2015

Jeet Singh
c/o CW3M Company
P.O. Box 571
Carlinville, IL 62626

In Re: Facility No. 3-008580
IEMA Incident No. 14-0247
Aman Food & Gas
1830 5th Avenue
Moline, Rock Island Co., IL

Dear Applicant:

The Reimbursement Eligibility and Deductible Application received on November 17, 2014 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 \$5,000. The costs must be in response to the occurrence referenced above and associated with the following tanks:

Eligible Tanks

Tank 1 5,000 gallon Gasoline
Tank 2 3,000 gallon Gasoline
Tank 3 4,000 gallon Gasoline

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

1035 Stevenson Drive • Springfield, IL 62703-4259
Printed on Recycled Paper

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 105.504(b)).

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

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 4 4,000 gallon Gasoline
Tank 5 6,000 gallon Gasoline

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
CW3M Company

APPENDIX G

HYDRAULIC CONDUCTIVITY CALCULATIONS

**STAGE 3 SITE INVESTIGATION PLAN AND
BUDGET
AMAN FOOD & GAS
MOLINE, ILLINOIS**

Bouwer & Rice Method
Version 2.00
6/18/1995

Notice to users: Each user will determine the accuracy of this program and its suitability to a particular purpose before basing any decisions upon program results. All risks of such decisions will be borne by the user. Please notify CSA of any suspected errors in the program.

©Creative Scientific Applications Calculation Status

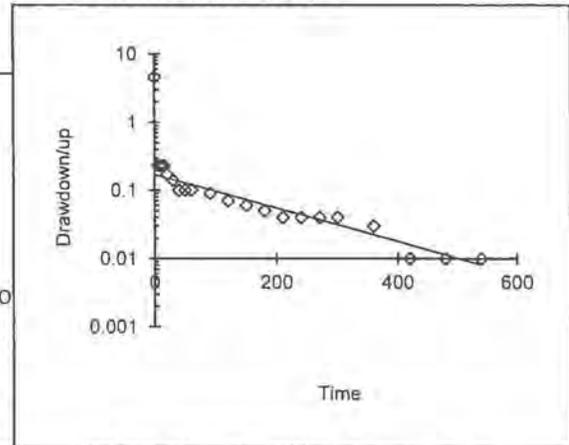
Automatic Calculation

Bouwer & Rice Method for Calculating Hydraulic Conductivity

Project Name: Aman Food & Gas
Client Name: Aman Food & Gas
Analysis By: MDR/MJS
Run Date: 4/19/2016

Project No.: 2014-0247
Identification: MW-1

Riser Pipe Diameter: 0.1667 feet
Intake Diameter: 0.604 feet
Intake Length: 10 feet
Saturated Column Length: 9.58 feet
Water Table Depth: 8.85 feet
Aquifer Thickness: 10 feet
Line Fit Starting No.: 2 Min 1 to
Line Fit Ending No.: 18 Max 21
Specify Output Units: 1 1 to 9
Hyd. Cond., K(h): 4.91E-06 ft./sec.
Error of Fit: 0.966



Meas. #	Time seconds	Field Meas. feet	Drawdown/up feet	Line Fit To LN(Yt)	Regression On LN(Yt)
1)	0.00	4.30	4.55	1.515	-1.778
2)	5.00	8.62	0.23	-1.470	-1.806
3)	10.00	8.62	0.23	-1.470	-1.834
4)	15.00	8.62	0.23	-1.470	-1.862
5)	20.00	8.68	0.17	-1.772	-1.890
6)	30.00	8.71	0.14	-1.966	-1.947
7)	40.00	8.75	0.10	-2.303	-2.003
8)	50.00	8.75	0.10	-2.303	-2.059
9)	60.00	8.75	0.10	-2.303	-2.115
10)	90.00	8.76	0.09	-2.408	-2.284
11)	120.00	8.78	0.07	-2.659	-2.453
12)	150.00	8.79	0.06	-2.813	-2.621
13)	180.00	8.80	0.05	-2.996	-2.790
14)	210.00	8.81	0.04	-3.219	-2.959
15)	240.00	8.81	0.04	-3.219	-3.127
16)	270.00	8.81	0.04	-3.219	-3.296
17)	300.00	8.81	0.04	-3.219	-3.465
18)	360.00	8.82	0.03	-3.507	-3.802

19)	420.00	8.84	0.01		-4.605	-4.139
20)	480.00	8.84	0.01		-4.605	-4.477
21)	540.00	8.84	0.01		-4.605	-4.814

Kuhlman, Eric

From: Kuhlman, Eric
Sent: Friday, September 30, 2016 10:17 AM
To: Matt Rives
Subject: Aman Food & Gas -- LUST Incident #2014 0247

Matt, you'll need to correct and re-submit the Stage 2 AC and Stage 3 BUD because of the following:

- The Stage 2 AC was submitted with the wrong rates, please correct and re-submit the Stage 2 AC with the 2015 Subpart H rates.
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Thanks, Eric .

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Kuhlman, Eric

From: matt@cwmcompany.com
Sent: Monday, November 14, 2016 11:29 AM
To: Kuhlman, Eric
Cc: Carol Rowe; Colantino, Steve
Subject: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
Attachments: budget update.pdf

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I had a chance to look over your budget concerns and this is what I found.

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Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

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From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 9/30/16 8:17 am
To: "Matt Rives" <matt@cwmccompany.com>

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unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.

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	Proposed	
Drilling and Monitoring Well Costs Form	\$	\$	\$ 2,472.21	\$ 2,497.10	\$
Analytical Costs Form	\$	\$	\$ 1,282.15	\$ 265.32	\$
Remediation and Disposal Costs Form	\$	\$	\$	\$ 625.76	\$
UST Removal and Abandonment Costs Form	\$	\$	\$	\$	\$
Paving, Demolition, and Well Abandonment Costs Form	\$	\$	\$	\$	\$
Consulting Personnel Costs Form	\$	\$	\$ 18,330.40	\$ 35,822.81	\$
Consultant's Materials Costs Form	\$	\$	\$ 1,138.50	\$ 1,281.00	\$
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	\$	\$	\$ 23,223.26	\$ 40,491.99	\$

Consulting Personnel Costs Form

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Senior Project Manager	5.00	121.49	\$607.45
Stage 2-Field	Field Preparation, Scheduling, Arrangements/Coordination for Investigation Activities			
	Engineer I	12.00	91.11	\$1,093.32
Stage 2-Field	Drilling/ Soil Sampling / Performing Slug Test			
	Engineer III	16.00	121.49	\$1,943.84
Stage 2-Field	Drilling/ Soil Sampling / Performing Slug Test / Field Prep / Mobilization / Drilling Plan			
	Engineer III	10.00	121.49	\$1,214.90
Stage 2-Field	Groundwater Sampling, Surveying			
	Senior Project Manager	10.00	121.49	\$1,214.90
Stage 2-Field	Groundwater Sampling, Surveying			
	Senior Project Manager	6.00	121.49	\$728.94
Stage 2-Field	Evaluate Analytical Results, Borelogs, and Well Completion Reports / SI Documentation			
	Engineer I	8.00	91.11	\$728.88
Stage 2-Field	Record Borelogs, Record Well Completion Reports, and Tabulation of Analytical Results			
	Draftperson/CAD III	5.00	60.74	\$303.70
Stage 2-Field	Field Prep Maps / Drafting for Field Activities			
	Senior Admin. Assistant	2.00	54.67	\$109.34
Stage 2-Field	Arrangements for Investigation, Utilities/JULIE, and Scheduling			

Electronic Filing: Received, Clerk's Office 4/5/2017

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Senior Project Manager	6.00	121.49	\$728.94
Stage 2-Plan	Site Investigation Plan Development Oversight/Review			
	Senior Prof. Engineer	3.00	157.94	\$473.82
Stage 2-Plan	Stage 2 Plan Certification			
	Engineer I	26.00	91.11	\$2,368.86
Stage 2-Plan	Stage 2 Plan Inputs			
	Draftperson/CAD III	5.00	60.74	\$303.70
Stage 2-Plan	Drafting/Editing of Maps			
	Engineer III	3.00	121.49	\$364.47
Stage 2-Plan	Stage 2 Plan Development / Drill Plan			
	Engineer III	6.00	121.49	\$728.94
Stage 2-Field	Drilling Plan/ Field Prep/ Mobilization			
	Senior Project Manager	6.00	121.49	\$728.94
Stage 2-Budget	Stage 2 Budget Technical Compliance and Oversight			
	Senior Prof. Engineer	2.00	157.94	\$315.88
Stage 2-Budget	Stage 2 Budget Certification			

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Stage 2-Budget	Stage 2 Budget Calculations and Inputs			
	Senior Admin. Assistant	2.00	54.67	\$109.34
Stage 2-Budget	Stage 2 Budget Compilation, Assembly, and Distribution			
	Senior Project Manager	10.00	121.49	\$1,214.90
Stage 2-Pay	Stage 2 Reimbursement Coordination / Oversight and Technical Compliance			
	Senior Prof. Engineer	4.00	157.49	\$629.96
Stage 2-Pay	Stage 2 Reimbursement Certification			
	Senior Acct. Technician	22.00	66.81	\$1,469.82
Stage 2-Pay	Stage 2 Reimbursement Preparation			
	Senior Admin. Assistant	4.00	54.67	\$218.68
Stage 2-Pay	Stage 2 Reimbursement Compilation, Assembly, and Distribution			

*Refer to the applicable Maximum Payment Amounts document.

Total of Consulting Personnel Costs	\$18,330.40
--	--------------------

Kuhlman, Eric

From: Kuhlman, Eric
Sent: Tuesday, November 15, 2016 2:21 PM
To: 'matt@cwmcompany.com'
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Hey Matt, when should I expect to receive the other revised budget forms? Because you only sent me a revised Budget Summary and the Consulting Personnel Costs forms for the Stage 2 Actual Costs. Eric

From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]
Sent: Monday, November 14, 2016 11:29 AM
To: Kuhlman, Eric
Cc: Carol Rowe; Colantino, Steve
Subject: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

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Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 9/30/16 8:17 am
To: "Matt Rives" <matt@cwmccompany.com>

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Kuhlman, Eric

From: matt@cwmcompany.com
Sent: Tuesday, November 15, 2016 2:56 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
Attachments: Budget Update 1.1.pdf

I am sorry I didn't realize all the rates were off I thought it was just personnel. Here is the updated sheets, and summary page.

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric"
Date: 11/15/16 1:23 pm
To: "matt@cwmcompany.com"

Hey Matt, when should I expect to receive the other revised budget forms? Eric

From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]
Sent: Monday, November 14, 2016 11:29 AM
To: Kuhlman, Eric
Cc: Carol Rowe; Colantino, Steve
Subject: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Hey Eric,

I had a chance to look over your budget concerns and this is what I found.

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I have attached the updated sheets with the 2015 Subpart H rates.

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Analytical Costs Form

Laboratory Analysis	Number of Samples		Cost (\$) per Analysis		Total per Parameter
Chemical Analysis					
BETX Soil with MTBE EPA 8260	5	X	103.26	=	\$516.30
BETX Water with MTBE EPA 8260	2	X	98.41	=	\$196.82
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	1	X	46.16	=	\$46.16
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 (ρ _b) ASTM D2937-94	1	X	26.72	=	\$26.72
Ex-situ Hydraulic Conductivity / Permeability		X		=	
Moisture Content (w) ASTM D2216-92 / D4643-93	1	X	14.58	=	\$14.58
Porosity		X		=	
Rock Hydraulic Conductivity Ex-situ		X		=	
Sieve / Particle Size Analysis ASTM D422-63 / D1140-54	1	X	179.15	=	\$179.15
Soil Classification ASTM D2488-90 / D2487-90		X		=	
Soil Particle Density (ρ _s) ASTM D854-92	1	X	100.00	=	\$100.00
		X		=	
		X		=	
		X		=	

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	10.00	10.00	Soil Plume Delineation
1	HSA	15.00	15.00	Soil and Groundwater Plume Delineations
1	HSA	15.00	15.00	Groundwater Plume Delineation
1	PUSH	10.00	10.00	Tier 2 Analysis TACO Sample

Subpart H minimum payment amount applies.

	Total Feet	Rate per Foot (\$)	Total Cost (\$)
Total Feet via HSA:	30.00	27.94	838.20
Total Feet via PUSH:	20.00	21.87	437.40
Total Feet for Injection via PUSH:		18.23	
Total Drilling Costs:			1,822.27

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 (\$)
2	HSA	2.00	15.00	30.00

Well Installation	Total Feet	Rate per Foot (\$)	Total Cost (\$)
Total Feet via HSA:	30.00	20.05	601.50
Total Feet via PUSH:		15.18	
Total Feet of 4" or 6" Recovery:		30.38	
Total Feet of 8" or Greater Recovery:		49.81	
Total Well Costs:			601.50

Total Drilling and Monitoring Well Costs:	\$2,423.77
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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	5	X	12.15	=	\$60.75
Sample Shipping per sampling event ¹	2	X	60.74	=	\$121.48

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

Total Analytical Costs: \$ 1,261.96

Consulting Personnel Costs Form

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Senior Project Manager	5.00	121.49	\$607.45
Stage 2-Field	Field Preparation, Scheduling, Arrangements/Coordination for Investigation Activities			
	Engineer I	12.00	91.11	\$1,093.32
Stage 2-Field	Drilling/ Soil Sampling / Performing Slug Test			
	Engineer III	16.00	121.49	\$1,943.84
Stage 2-Field	Drilling/ Soil Sampling / Performing Slug Test / Field Prep / Mobilization / Drilling Plan			
	Engineer III	10.00	121.49	\$1,214.90
Stage 2-Field	Groundwater Sampling, Surveying			
	Senior Project Manager	10.00	121.49	\$1,214.90
Stage 2-Field	Groundwater Sampling, Surveying			
	Senior Project Manager	6.00	121.49	\$728.94
Stage 2-Field	Evaluate Analytical Results, Borelogs, and Well Completion Reports / SI Documentation			
	Engineer I	8.00	91.11	\$728.88
Stage 2-Field	Record Borelogs, Record Well Completion Reports, and Tabulation of Analytical Results			
	Draftperson/CAD III	5.00	60.74	\$303.70
Stage 2-Field	Field Prep Maps / Drafting for Field Activities			
	Senior Admin. Assistant	2.00	54.67	\$109.34
Stage 2-Field	Arrangements for Investigation, Utilities/JULIE, and Scheduling			

Employee Name		Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task				
		Senior Project Manager	6.00	121.49	\$728.94
Stage 2-Plan	Site Investigation Plan Development Oversight/Review				
		Senior Prof. Engineer	3.00	157.94	\$473.82
Stage 2-Plan	Stage 2 Plan Certification				
		Engineer I	26.00	91.11	\$2,368.86
Stage 2-Plan	Stage 2 Plan Inputs				
		Draftperson/CAD III	5.00	60.74	\$303.70
Stage 2-Plan	Drafting/Editing of Maps				
		Engineer III	3.00	121.49	\$364.47
Stage 2-Plan	Stage 2 Plan Development / Drill Plan				
		Engineer III	6.00	121.49	\$728.94
Stage 2-Field	Drilling Plan/ Field Prep/ Mobilization				
		Senior Project Manager	6.00	121.49	\$728.94
Stage 2-Budget	Stage 2 Budget Technical Compliance and Oversight				
		Senior Prof. Engineer	2.00	157.94	\$315.88
Stage 2-Budget	Stage 2 Budget Certification				

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Engineer I	8.00	91.11	\$728.88
Stage 2-Budget	Stage 2 Budget Calculations and Inputs			
	Senior Admin. Assistant	2.00	54.67	\$109.34
Stage 2-Budget	Stage 2 Budget Compilation, Assembly, and Distribution			
	Senior Project Manager	10.00	121.49	\$1,214.90
Stage 2-Pay	Stage 2 Reimbursement Coordination / Oversight and Technical Compliance			
	Senior Prof. Engineer	4.00	157.49	\$629.96
Stage 2-Pay	Stage 2 Reimbursement Certification			
	Senior Accl. Technician	22.00	66.81	\$1,469.82
Stage 2-Pay	Stage 2 Reimbursement Preparation			
	Senior Admin. Assistant	4.00	54.67	\$218.68
Stage 2-Pay	Stage 2 Reimbursement Compilation, Assembly, and Distribution			

*Refer to the applicable Maximum Payment Amounts document.

Total of Consulting Personnel Costs	\$18,330.40
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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	148.00	/day	\$148.00
Stage 2-Field	Detect VOC Levels in Soil Samples			
Measuring Wheel	1.00	21.00	/day	\$21.00
Stage 2-Field	Mapping Sampling Locations			
Disposable Gloves	1.00	13.00	/box	\$13.00
Stage 2-Field	Disposable Latex Gloves for Soil Sampling, Groundwater Sampling			
Mileage	680.00	.65	/mile	\$442.00
Stage 2-Field	2 Round Trip from Springfield Office to Site (Drilling/Sampling - Groundwater Sampling)			
Water Level Indicator	2.00	28.00	/day	\$56.00
Stage 2-Field	Measure Groundwater Levels During Drilling / Slug Test, Groundwater Sampling			
Survey Equipment Rental	1.00	86.00	/day	\$86.00
Stage 2-Field	Survey monitoring well elevations for groundwater flow calculations			
Copies	500.00	.15	/copy	\$75.00
Stage 2-Plan	Copies/Drafts/Forms of Stage 2 Plan / IEPA Correspondences			
Postage	2.00	6.00	/each	\$12.00
Stage 2-Plan	Stage 2 Report/Forms Distribution			
Copies	200.00	.15	/copy	\$30.00
Stage 2-Budget	Copies of Stage 2 Budget/Draft			

Materials, Equipment, or Field Purchase		Time or Amount Used	Rate (\$)	Unit	Total Cost
Remediation Category	Description/Justification				
Postage		2.00	6.00	/each	\$12.00
Stage 2-Budget	Stage 2 Budget/Forms Distribution				
Copies		800.00	.15	/copy	\$120.00
Stage 2-Pay	Copies of Stage 2 Reimbursement Request/Supporting Documentation				
Postage		2.00	6.00	/each	\$12.00
Stage 2-Pay	Stage 2 Forms and Reimbursement Distribution				
Copies		250.00	.15	/copy	\$37.50
Stage 2-Field	Field Preparation/Maps/Borelogs/Analytical Reports/Field Reports				
Bailers		2.00	16.00	/each	\$32.00
Stage 2-Field	Disposable Bailers for Monitoring Well Development and Sampling				
Bailing Twine		1.00	6.00	/roll	\$6.00
Stage 2-Field	String for Bailers, Well Development, and Sampling				
Slug Test		1.00	36.00	/day	\$36.00
Stage 2-Field	Materials Used to Perform Slug Test				
Total of Consultant Materials Costs					\$1,138.50

Kuhlman, Eric

From: matt@cwmcompany.com
Sent: Tuesday, November 15, 2016 3:08 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
Attachments: Summary Update 1.1.pdf

Here is the Summary Page.

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: matt@cwmcompany.com
Date: 11/15/16 1:55 pm
To: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>

I am sorry I didn't realize all the rates were off I thought it was just personnel. Here is the updated sheets, and summary page.

Matthew D. Rives

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From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/15/16 1:23 pm
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

Hey Matt, when should I expect to receive the other revised budget forms? Eric

From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]
Sent: Monday, November 14, 2016 11:29 AM
To: Kuhlman, Eric
Cc: Carol Rowe; Colantino, Steve
Subject: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Hey Eric,

I had a chance to look over your budget concerns and this is what I found.

- *The Stage 2 AC was submitted with the wrong rates, please correct and re-submit the Stage 2 AC with the 2015 Subpart H rates.*

I have attached the updated sheets with the 2015 Subpart H rates.

- *On the Remediation and Disposal Costs page, the drum disposal costs for solid water should be deducted since they weren't in the Stage 2 BUD.*

I have attached the updated budget sheets with disposal removed.

- *On the Consulting Personnel Costs pages, the following personnel and hours were approved by the Agency:*
 - *➤ First page, First entry -- Only 4 hours were tasked for field preparation, scheduling, arrangements/coordination by the Senior Administrative Assistant, not the Senior Project Manager.*

We apologize this was submitted in error in the proposed budget and should have been caught. The tasks described are not acceptable for completion by a Senior Administrative Assistant and were completed by a Senior Project Manager.

- *➤ First page, Third entry -- The Professional Geologist was tasked with drilling/soil sampling/field prep/mobilization/drilling plan, not the Engineer III.*

A Professional Geologist and Engineer III were proposed for drilling/ sampling and an Engineer I and Engineer III actually completed the task. During development of a proposed budget there is no way we can know exactly who will be available to perform and complete the specific tasks or

activities. Available personnel at the time are used for the tasks at hand, and though their specific title may not match the proposed line item they are still a comparable title by IEPA standards to complete such task. Also, in this situation personnel costs that add up to a lower total than proposed were used along with completing the task in less time than proposed.

- *➤ First page, Fourth entry -- The Engineer I was tasked with groundwater sampling & surveying, not the Engineer III .*
- *➤ First page, Fifth entry -- The Professional Geologist was tasked with groundwater sampling & surveying, not the Senior Project Manager.*

During development of a proposed budget there is no way we can know exactly who will be available to perform and complete the specific tasks or activities. Specifically in this situation, where we proposed work that was completed nine months after the proposed budget was submitted. Available personnel at the time are used for the tasks at hand, and though their specific title may not match the proposed line item they are still a comparable title by IEPA standards to complete such task. Also, even though the Engineer III and Senior Project Manager did the work they were able to do it in a shorter amount of time than proposed, making the line item under the proposed cost for that task.

- *➤ Second page, sixth entry -- only 4 hours were approved for drilling plan/field prep/mobilization by the Engineer III,*

Not all actual line items should be expected to come in under the proposed as it is proposed budget of expected costs, and the actual budget should reflect the actual cost incurred. Due to our experience and expertise, most items closely resemble the proposed budget; but may be slightly different when the works actually completed. Our due diligence and ability to reduce costs should not result in the denial of work on a specific line item's time that was actual required to complete the task. The regulatory intent of the proposal budget was to provide consultants and owner operators approval of costs in stages and the proposal was to be an estimate of likely cost, followed by actual costs for which the agency would approve as the budget. If this wasn't the case it would require us to propose and the IEPA to deem acceptable the extreme worst case scenario hours for every task. We both know that would not be acceptable to the IEPA. The purpose of the actual budget is to help the IEPA flag/quickly notice costs that are exorbitantly higher than what was previously proposed allowing the IEPA to ask for clarification on the large amount of cost. In this case the extra two hours that were actually required for drill plan/ field prep were due to the fact that a major gas main utility was located in the vicinity of SB-4. This required extra correspondence with multiple utility personnel for location of this main and set up of drilling with them on site.

- *➤ Third page, last entry -- only 3 hours were approved for Stage 2 reimbursement compilation, assembly, and distribution by the Senior Administrative Assistant,*

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- *Please be aware you'll need to justify the consultant's material costs in both the Stage 2 AC and Stage 3 BUD*

We have answered these questions plenty of times in a multitude of ways to you and other project managers. We have found that the agency has established new rates, which are less than ours in some cases and it doesn't matter what we submit for reasonableness of the rates. We believe this issue will be addressed in the appeals currently in process and a budget amendment for approved cost can be established then. This helps move the projects forward, remove wasted time for correspondence and removes any possible animosity or frustration that may be accrued between us and project managers.

- *Could you also explain what "Materials used to perform slug test"? Cause I have no idea what you're talking about.*

The materials used for a slug test are the slug and data logging materials. If you are not familiar with how a slug test is performed and material required you can reference ASTM 4044/4044M for clarification.

- *There's also a mathematical error in your mileage, Google Maps has the distance from CWM in Spgfd to the site as 165 miles.*

I see no error with your actual. When I typed the site addresses and your office location in to Google Maps it came up with 167 miles. This of course doesn't include the extra distance for stopping for fuel, bathroom breaks and lunch. This extra distance can be an extra 10% approximately. So with a total of 2 round trips 735 mile could be expected for travel to and from site. Your actual is well below that, and actually only 12 miles (6 miles per round trip) for the extra distance included for fuel, bathroom breaks and lunch.

A proposed budget is just that, a proposal or working guidelines of anticipated costs. Per the IEPA's guidelines that is why a budget is not approved at the time the plan is approved and only includes specified language about the approval of the Stage 2 plan; and budget is "Costs must be incurred in accordance with the approved plan and must be determined in accordance with 35 Ill. Adm. Code 734. Subpart H, Appendix D, and Appendix E".

While every individual line item may not come under the proposed amount, it can be reasonably expected that each subsection, task / phase code should come under or within a marginally increased amount when the actual amounts have been incurred and presented as the actual budget. We can plan and develop a budget with an expectation of which personnel may conduct itemized tasks. However, because of workloads, field demands etc, some tasks are completed by other equally qualified and competent personnel, all within Subpart H rates. Should the actual budget show significant deviation in time and effort, a justification would then be in order. Our best guideline is the Agency's letter approving plans, the Agency's treatment of proposed vs actual budget on prior sites

To report anything for reimbursement other than our true actual would just be wrong and not match the technical report either. We review the totals for each subsection completed to verify if actual is under or over within reasonable margins of the proposed. This is truly the only way to give the Agency reasonable budgets. For this project the complete total amount proposed for personnel of the two plans was \$26,588.02 and actual costs of \$18,330.40 a 31% decrease from proposed to actual.

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 9/30/16 8:17 am
To: "Matt Rives" <matt@cwmccompany.com>

Matt, you'll need to correct and re-submit the Stage 2 AC and Stage 3 BUD because of the following:

<![if !supportLists]>• <![endif]>The Stage 2 AC was submitted with the wrong rates, please correct and re-submit the Stage 2 AC with the 2015 Subpart H rates.

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<![if !supportLists]>• <![endif]>There's also a mathematical error in your mileage, Google Maps has the distance from CWM in Spgfd to the site as 165 miles.

Thanks, Eric .

P.S. In the future, could you submit the site map concerning early action sampling? Otherwise, I need to go back to previous reports and try and determine where the "hot spots" are concerning the early action samples. Please note your Stage 3 SIP is missing the cross-section map showing the geology and horizontal and vertical extent of the soil and groundwater contamination that exceeds the most stringent Tier I remediation objectives.

State of Illinois - CONFIDENTIALITY NOTICE: The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use,

disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.

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	Proposed	
Drilling and Monitoring Well Costs Form	\$	\$	\$ 2,423.77	\$ 2,497.10	\$
Analytical Costs Form	\$	\$	\$ 1,261.96	\$ 265.32	\$
Remediation and Disposal Costs Form	\$	\$	\$	\$ 625.76	\$
UST Removal and Abandonment Costs Form	\$	\$	\$	\$	\$
Paving, Demolition, and Well Abandonment Costs Form	\$	\$	\$	\$	\$
Consulting Personnel Costs Form	\$	\$	\$ 18,330.40	\$ 35,822.81	\$
Consultant's Materials Costs Form	\$	\$	\$ 1,138.50	\$ 1,281.00	\$
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	\$	\$	\$ 23,154.63	\$ 40,491.99	\$

Kuhlman, Eric

From: Kuhlman, Eric
Sent: Wednesday, November 16, 2016 7:43 AM
To: 'matt@cwmcompany.com'
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Thanks, Matt.

However, it occurs to me that I may not be able to get the Agency response letter signed and mailed before the due date on November 26th before the upcoming holiday. Therefore, I respectfully request that your client waive the right to final decision for a minimum of 60 days in accordance with 734.505(d). That way we're covered if my managers and support staff decide to take leave before the holiday. Eric

From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]
Sent: Tuesday, November 15, 2016 3:08 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Here is the Summary Page.

Matthew D. Rives

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p: (217) 522-8001
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To: "matt@cwmcompany.com" <matt@cwmcompany.com>

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From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]

Sent: Monday, November 14, 2016 11:29 AM

To: Kuhlman, Eric

Cc: Carol Rowe; Colantino, Steve

Subject: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

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I have attached the updated sheets with the 2015 Subpart H rates.

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I have attached the updated budget sheets with disposal removed.

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- *➤ First page, Third entry -- The Professional Geologist was tasked with drilling/soil sampling/field prep/mobilization/drilling plan, not the Engineer III.*

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Matthew D. Rives

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Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 9/30/16 8:17 am
To: "Matt Rives" <matt@cwcompany.com>

Matt, you'll need to correct and re-submit the Stage 2 AC and Stage 3 BUD because of the following:

<![if !supportLists]>• <![endif]>The Stage 2 AC was submitted with the wrong rates, please correct and re-submit the Stage 2 AC with the 2015 Subpart H rates.

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Kuhlman, Eric

From: matt@cwmcompany.com
Sent: Wednesday, November 16, 2016 9:48 AM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Yes I am sure I can get an extension out to you, I understand with the holiday next week it might be close. I assume the response letter would be in after the holiday week and not need the whole 60 days?

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/16/16 6:42 am
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

Thanks, Matt.

However, it occurs to me that I may not be able to get the Agency response letter signed and mailed before the due date on November 26th before the upcoming holiday. Therefore, I respectfully request that your client waive the right to final decision for a minimum of 60 days in accordance with 734.505(d). That way we're covered if my managers and support staff decide to take leave before the holiday. Eric

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Sent: Tuesday, November 15, 2016 3:08 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

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From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/15/16 1:23 pm
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

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From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]
Sent: Monday, November 14, 2016 11:29 AM
To: Kuhlman, Eric
Cc: Carol Rowe; Colantino, Steve
Subject: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Hey Eric,

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be established then. This helps move the projects forward, remove wasted time for correspondence and removes any possible animosity or frustration that may be accrued between us and project managers.

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Matthew D. Rives

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f: (217) 522-8009

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From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 9/30/16 8:17 am
To: "Matt Rives" <matt@cwmcompany.com>

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From: Kuhlman, Eric
Sent: Wednesday, November 16, 2016 9:57 AM
To: 'matt@cwmcompany.com'
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

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From: matt@cwmcompany.com
Sent: Wednesday, November 16, 2016 10:45 AM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
Attachments: Aman Extension St3.pdf

The hard copy will be in by the end of the week.

Matthew D. Rives

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Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Yes I am sure I can get an extension out to you, I understand with the holiday next week it might be close. I assume the response letter would be in after the holiday week and not need the whole 60 days?

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/16/16 6:42 am
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

Thanks, Matt.

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From: matt@cwmcompany.com [<mailto:matt@cwmcompany.com>]
Sent: Tuesday, November 15, 2016 3:08 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Here is the Summary Page.

Matthew D. Rives

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Cc: Carol Rowe; Colantino, Steve
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subsection, task / phase code should come under or within a marginally increased amount when the actual amounts have been incurred and presented as the actual budget. We can plan and develop a budget with an expectation of which personnel may conduct itemized tasks. However, because of workloads, field demands etc, some tasks are completed by other equally qualified and competent personnel, all within Subpart H rates. Should the actual budget show significant deviation in time and effort, a justification would then be in order. Our best guideline is the Agency's letter approving plans, the Agency's treatment of proposed vs actual budget on prior sites

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Matthew D. Rives

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Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

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From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 9/30/16 8:17 am
To: "Matt Rives" <matt@cwmcompany.com>

Matt, you'll need to correct and re-submit the Stage 2 AC and Stage 3 BUD because of the following:

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P.S. In the future, could you submit the site map
concerning early action sampling? Otherwise, I need to
go back to previous reports and try and determine where
the "hot spots" are concerning the early action
samples. Please note your Stage 3 SIP is missing the
cross-section map showing the geology and horizontal
and vertical extent of the soil and groundwater
contamination that exceeds the most stringent Tier I
remediation objectives.

State of Illinois - CONFIDENTIALITY NOTICE: The

information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.

CW³M Company
Environmental Consulting Services

701 W. South Grand Avenue
Springfield, IL 62704

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

November 16, 2016

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

RE: LPC #1610455194 –Rock Island County
Aman Food & Gas
1830 5th Avenue
Incident Number: 2014-0247
LUST Technical Reports—Stage 3 Site Investigation Plan and Budget
Extension for Final Decision

Dear Mr. Kuhlman,

On behalf of Aman Food & Gas, owner of the USTs at the above-referenced site, we are submitting an extension for the final decision allowed by 734.550 (d) for the minimum of 60 days. The extension is for the Stage 3 Site Investigation Plan and Budget submitted on July 29, 2016. This includes the results of the Stage 2 investigation as well as a summary of the costs.

If you have any questions or require additional information, please contact Mr. Matt Rives or me at (217) 522-8001.

Sincerely,



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

xc: Mrs. Balbir Kaur & Mr. Jeet Singh, *Aman Food & Gas*
Mr. William T. Sinnott, *CW³M Company, Inc.*

701 W. South Grand Avenue
Springfield, IL 62704
(217) 522-8001

400 West Jackson, Suite C
Marion, IL 62959
(618) 997-2238

Kuhlman, Eric

From: Kuhlman, Eric
Sent: Wednesday, November 16, 2016 11:32 AM
To: 'matt@cwmcompany.com'
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Thanks, Matt.

P.S. Are you sure we can't work out something regarding the Consultant's Materials Costs in your budgets?

From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]
Sent: Wednesday, November 16, 2016 10:45 AM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

The hard copy will be in by the end of the week.

Matthew D. Rives

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From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
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Ya I am always willing to work with you guys. I like being able to move these forward without the extra time that the appeal take up. What ya thinking?

Matthew D. Rives

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701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/16/16 10:31 am
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

Thanks, Matt.

P.S. Are you sure we can't work out something regarding the Consultant's Materials Costs in your budgets?

From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]
Sent: Wednesday, November 16, 2016 10:45 AM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

The hard copy will be in by the end of the week.

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

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Date: 11/16/16 8:56 am
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

That's right.

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Yes I am sure I can get an extension out to you, I understand with the holiday next week it might be close. I assume the response letter would be in after the holiday week and not need the whole 60 days?

Matthew D. Rives

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Hey Matt, when should I expect to receive the other revised budget forms? Eric

From: matt@cwmcompany.com
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Cc: Carol Rowe; Colantino, Steve
Subject: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

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I have attached the updated sheets with the 2015 Subpart H rates.

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I see no error with your actual. When I typed the site addresses and your office location in to Google Maps it came up with 167 miles. This of course doesn't include the extra distance for stopping for fuel, bathroom breaks and lunch. This extra distance can be an extra 10% approximately. So with a total of 2 round trips 735 mile could be expected for travel to and from site. Your actual is well below that, and actually only 12 miles (6 miles per round trip) for the extra distance included for fuel, bathroom breaks and lunch.

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Matthew D. Rives

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701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: Aman Food & Gas -- LUST Incident
#2014 0247
From: "Kuhlman, Eric"
<Eric.Kuhlman@Illinois.gov>
Date: 9/30/16 8:17 am
To: "Matt Rives" <matt@cwmcompany.com>

Matt, you'll need to correct and re-submit the Stage 2 AC and Stage 3 BUD because of the following:

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about.

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mathematical error in your mileage, Google
Maps has the distance from CWM in Spgfd to
the site as 165 miles.

Thanks, Eric .

P.S. In the future, could you submit the site
map concerning early action sampling?
Otherwise, I need to go back to previous reports
and try and determine where the "hot spots" are
concerning the early action samples. Please
note your Stage 3 SIP is missing the cross-
section map showing the geology and horizontal
and vertical extent of the soil and groundwater
contamination that exceeds the most stringent
Tier I remediation objectives.

State of Illinois - CONFIDENTIALITY
NOTICE: The information contained in this
communication is confidential, may be
attorney-client privileged or attorney work
product, may constitute inside information
or internal deliberative staff communication,

and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.

Kuhlman, Eric

From: Kuhlman, Eric
Sent: Wednesday, November 16, 2016 5:42 PM
To: 'matt@cwmcompany.com'
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Here's what I'm thinking:

I'd rather see you get something for your equipment rather than nothing. I think it's easier talking to me than through lawyers and a lot more productive, as well as less costly. However, if you'd rather the unit rates for Consulting Materials were addressed in appeals that is your right and I can respect that.

It's just unfortunate that there's a better, cheaper, and faster way to resolve our disagreements.

Sincerely,

Eric Kuhlman
Leaking UST Section
Bureau of Land
Illinois EPA

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Sent: Wednesday, November 16, 2016 3:56 PM
To: Kuhlman, Eric
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Ya I am always willing to work with you guys. I like being able to move these forward without the extra time that the appeal take up. What ya thinking?

Matthew D. Rives

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<![if !supportLists]>> <![endif]>Second page, sixth entry -- only 4 hours were approved for drilling plan/field prep/mobilization by the Engineer III,

<![if !supportLists]>> <![endif]>Third page, last entry -- only 3 hours were approved for Stage 2 reimbursement compilation, assembly, and distribution by the Senior Administrative Assistant,

<![if !supportLists]>• <![endif]>Please be aware you'll need to justify the consultant's material costs in both the Stage 2 AC and Stage 3 BUD.

<![if !supportLists]>• <![endif]>Could you also explain what "Materials used to perform slug test"? Cause I have no idea what you're talking about.

<![if !supportLists]>• <![endif]>There's also a mathematical error in your mileage, Google Maps has the distance from CWM in Spgfd to the site as 165 miles.

Thanks, Eric .

P.S. In the future, could you submit the site map concerning early action sampling? Otherwise, I need to go back to previous reports and try and determine where the "hot spots" are concerning the early action samples. Please note your Stage 3 SIP is missing the cross-section map showing the geology and horizontal and vertical extent of the soil and groundwater contamination that exceeds the most stringent Tier I remediation objectives.

State of Illinois - CONFIDENTIALITY
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CW²M Company
Environmental Consulting Services

701 W. South Grand Avenue
Springfield, IL 62704

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

November 16, 2016

LPC#1610455194 Rock Island County
Aman Food and Gas
Incident#20140247
LUST TECH

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

TOP

RE: LPC #1610455194 –Rock Island County
Aman Food & Gas
1830 5th Avenue
Incident Number: 2014-0247
LUST Technical Reports—Stage 3 Site Investigation Plan and Budget
Extension for Final Decision

Dear Mr. Kuhlman,

On behalf of Aman Food & Gas, owner of the USTs at the above-referenced site, we are submitting an extension for the final decision allowed by 734.550 (d) for the minimum of 60 days. The extension is for the Stage 3 Site Investigation Plan and Budget submitted on July 29, 2016. This includes the results of the Stage 2 investigation as well as a summary of the costs.

If you have any questions or require additional information, please contact Mr. Matt Rives or me at (217) 522-8001.

Sincerely,



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

cc: Mrs. Balbir Kaur & Mr. Jeet Singh, *Aman Food & Gas*
Mr. William T. Sinnott, *CW²M Company, Inc.*

RECEIVED

NOV 21 2016

IEPA/BOL

701 W. South Grand Avenue
Springfield, IL 62704
(217) 522-8001

400 West Jackson, Suite C
Marion, IL 62959
(618) 997-2238

Kuhlman, Eric

From: matt@cwmcompany.com
Sent: Thursday, November 17, 2016 8:18 AM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

I totally agree this is something we should be able to work out together. Appeals just take too much time and extra money that could be saved. What line items are you looking at and what adjusted rates are you thinking?

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/16/16 4:41 pm
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

Here's what I'm thinking:

I'd rather see you get something for your equipment rather than nothing. I think it's easier talking to me than through lawyers and a lot more productive, as well as less costly. However, if you'd rather the unit rates for Consulting Materials were addressed in appeals that is your right and I can respect that.

It's just unfortunate that there's a better, cheaper, and faster way to resolve our disagreements.

Sincerely,

Eric Kuhlman

Leaking UST Section

Bureau of Land

Illinois EPA

From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]
Sent: Wednesday, November 16, 2016 3:56 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Ya I am always willing to work with you guys. I like being able to move these forward without the extra time that the appeal take up. What ya thinking?

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/16/16 10:31 am
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

Thanks, Matt.

P.S. Are you sure we can't work out something regarding the Consultant's Materials Costs in your budgets?

From: matt@cwmcompany.com [<mailto:matt@cwmcompany.com>]
Sent: Wednesday, November 16, 2016 10:45 AM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

The hard copy will be in by the end of the week.

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/16/16 8:56 am
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

That's right.

From: matt@cwmcompany.com [<mailto:matt@cwmcompany.com>]
Sent: Wednesday, November 16, 2016 9:48 AM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Yes I am sure I can get an extension out to you, I understand with the holiday next week it might be close. I assume the response letter would be in after the holiday week and not need the whole 60 days?

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST
Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/16/16 6:42 am
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

Thanks, Matt.

However, it occurs to me that I may not be able to get the Agency response letter signed and mailed before the due date on November 26th before the upcoming holiday. Therefore, I respectfully request that your client waive the right to final decision for a minimum of 60 days in accordance with 734.505(d). That way we're covered if my managers and support staff decide to take leave before the holiday. Eric

From: matt@cwmcompany.com [<mailto:matt@cwmcompany.com>]
Sent: Tuesday, November 15, 2016 3:08 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Here is the Summary Page.

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST
Incident #2014 0247
From: matt@cwmcompany.com
Date: 11/15/16 1:55 pm
To: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>

I am sorry I didn't realize all the rates were off I thought it was just personnel. Here is the updated sheets, and summary page.

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas
-- LUST Incident #2014 0247
From: "Kuhlman, Eric"
<Eric.Kuhlman@Illinois.gov>
Date: 11/15/16 1:23 pm
To: "matt@cwmcompany.com"
<matt@cwmcompany.com>

Hey Matt, when should I expect to receive the other revised budget forms? Eric

From: matt@cwmcompany.com
[<mailto:matt@cwmcompany.com>]
Sent: Monday, November 14, 2016 11:29 AM
To: Kuhlman, Eric
Cc: Carol Rowe; Colantino, Steve
Subject: [External] RE: Aman Food & Gas -- LUST
Incident #2014 0247

Hey Eric,

I had a chance to look over your budget concerns and this is what I found.

- *The Stage 2 AC was submitted with the wrong rates, please correct and re-submit the Stage 2 AC with the 2015 Subpart H rates.*

I have attached the updated sheets with the 2015 Subpart H rates.

- *On the Remediation and Disposal Costs page, the drum disposal costs for solid water should be deducted since they weren't in the Stage 2 BUD.*

I have attached the updated budget sheets with disposal removed.

- *On the Consulting Personnel Costs pages, the following personnel and hours were approved by the Agency:*
 - *➤ First page, First entry -- Only 4 hours were tasked for field preparation, scheduling, arrangements/coordination by the Senior Administrative Assistant, not the Senior Project Manager.*

We apologize this was submitted in error in the proposed budget and should have been caught. The tasks described are not acceptable for completion by a Senior Administrative Assistant and were completed by a Senior Project Manager.

- *➤ First page, Third entry -- The Professional Geologist was tasked with drilling/soil sampling/field prep/mobilization/drilling plan, not the Engineer III.*

A Professional Geologist and Engineer III were proposed for drilling/ sampling and an Engineer I and Engineer III actually completed the task. During development of a proposed budget there is no way we can know exactly who will be available to perform and complete the specific tasks or activities. Available personnel at the time are used for the tasks at hand, and though their specific title may not match the proposed line item they are still a comparable

title by IEPA standards to complete such task. Also, in this situation personnel costs that add up to a lower total than proposed were used along with completing the task in less time than proposed.

- *➤First page, Fourth entry -- The Engineer I was tasked with groundwater sampling & surveying, not the Engineer III .*
- *➤First page, Fifth entry -- The Professional Geologist was tasked with groundwater sampling & surveying, not the Senior Project Manager.*

During development of a proposed budget there is no way we can know exactly who will be available to perform and complete the specific tasks or activities. Specifically in this situation, where we proposed work that was completed nine months after the proposed budget was submitted. Available personnel at the time are used for the tasks at hand, and though their specific title may not match the proposed line item they are still a comparable title by IEPA standards to complete such task. Also, even though the Engineer III and Senior Project Manager did the work they were able to do it in a shorter amount of time than proposed, making the line item under the proposed cost for that task.

- *➤Second page, sixth entry -- only 4 hours were approved for drilling plan/field prep/mobilization by the Engineer III,*

Not all actual line items should be expected to come in under the proposed as it is proposed budget of expected costs, and the actual budget should reflect the actual cost incurred. Due to our experience and expertise, most items closely resemble the proposed budget; but may be slightly different when the works actually completed. Our due diligence and ability to reduce costs should not result in the denial of

work on a specific line item's time that was actual required to complete the task. The regulatory intent of the proposal budget was to provide consultants and owner operators approval of costs in stages and the proposal was to be an estimate of likely cost, followed by actual costs for which the agency would approve as the budget. If this wasn't the case it would require us to propose and the IEPA to deem acceptable the extreme worst case scenario hours for every task. We both know that would not be acceptable to the IEPA. The purpose of the actual budget is to help the IEPA flag/quickly notice costs that are exorbitantly higher than what was previously proposed allowing the IEPA to ask for clarification on the large amount of cost. In this case the extra two hours that were actually required for drill plan/field prep were due to the fact that a major gas main utility was located in the vicinity of SB-4. This required extra correspondence with multiple utility personnel for location of this main and set up of drilling with them on site.

- *Third page, last entry -- only 3 hours were approved for Stage 2 reimbursement compilation, assembly, and distribution by the Senior Administrative Assistant,*

Not all actual line items should be expected to come in under the proposed as it is proposed budget of expected costs, and the actual budget should reflect the actual cost incurred. Due to our experience and expertise, most items closely resemble the proposed budget; but may be slightly different when the works actually completed. Our due diligence and ability to reduce costs should not result in the denial of work on a specific line item's time that was actual required to complete the task. The regulatory intent of the proposal budget was to provide consultants and owner operators approval of costs in stages and the proposal was to be an estimate of likely cost, followed by actual costs for which the agency would

approve as the budget. If this wasn't the case it would require us to propose and the IEPA to deem acceptable the extreme worst case scenario hours for every task. We both know that would not be acceptable to the IEPA. The purpose of the actual budget is to help the IEPA flag/quickly notice costs that are exorbitantly higher than what was previously proposed allowing the IEPA to ask for clarification on the large amount of cost. In this case the hour that will be required for compilation assembly and distribution of the Stage 2 reimbursement does not require a denial or a need for explanation of extra hours. The explanation is simply that is the time it will take to complete a review.

- *Please be aware you'll need to justify the consultant's material costs in both the Stage 2 AC and Stage 3 BUD*

We have answered these questions plenty of times in a multitude of ways to you and other project managers. We have found that the agency has established new rates, which are less than ours in some cases and it doesn't matter what we submit for reasonableness of the rates. We believe this issue will be addressed in the appeals currently in process and a budget amendment for approved cost can be established then. This helps move the projects forward, remove wasted time for correspondence and removes any possible animosity or frustration that may be accrued between us and project managers.

- *Could you also explain what "Materials used to perform slug test"? Cause I have no idea what you're talking about.*

The materials used for a slug test are the slug and data logging materials. If you are not familiar with how a slug test is performed and material required you can reference ASTM 4044/4044M for clarification.

- *There's also a mathematical error in your mileage, Google Maps has the distance from CWM in Spgfd to the site as 165 miles.*

I see no error with your actual. When I typed the site addresses and your office location in to Google Maps it came up with 167 miles. This of course doesn't include the extra distance for stopping for fuel, bathroom breaks and lunch. This extra distance can be an extra 10% approximately. So with a total of 2 round trips 735 mile could be expected for travel to and from site. Your actual is well below that, and actually only 12 miles (6 miles per round trip) for the extra distance included for fuel, bathroom breaks and lunch.

A proposed budget is just that, a proposal or working guidelines of anticipated costs. Per the IEPA's guidelines that is why a budget is not approved at the time the plan is approved and only includes specified language about the approval of the Stage 2 plan; and budget is "Costs must be incurred in accordance with the approved plan and must be determined in accordance with 35 Ill. Adm. Code 734. Subpart H, Appendix D, and Appendix E".

While every individual line item may not come under the proposed amount, it can be reasonably expected that each subsection, task / phase code should come under or within a marginally increased amount when the actual amounts have been incurred and presented as the actual budget. We can plan and develop a budget with an expectation of which personnel may conduct itemized tasks. However, because of workloads, field demands etc, some tasks are completed by other equally qualified and competent personnel, all within Subpart H rates. Should the actual budget show significant deviation in time and effort, a justification would then be in order. Our best guideline is the Agency's letter approving plans, the

Agency's treatment of proposed vs actual budget on prior sites

To report anything for reimbursement other than our true actual would just be wrong and not match the technical report either. We review the totals for each subsection completed to verify if actual is under or over within reasonable margins of the proposed. This is truly the only way to give the Agency reasonable budgets. For this project the complete total amount proposed for personnel of the two plans was \$26,588.02 and actual costs of \$18,330.40 a 31% decrease from proposed to actual.

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: Aman Food & Gas -- LUST
Incident #2014 0247
From: "Kuhlman, Eric"
<Eric.Kuhlman@Illinois.gov>
Date: 9/30/16 8:17 am
To: "Matt Rives"
<matt@cwmcompany.com>

Matt, you'll need to correct and re-submit the Stage 2 AC and Stage 3 BUD because of the following:

<![if !supportLists]>• <![endif]>The Stage 2 AC was submitted with the wrong rates, please correct and re-

submit the Stage 2 AC with the 2015 Subpart H rates.

<![if !supportLists]>• <![endif]>On the Remediation and Disposal Costs page, the drum disposal costs for solid water should be deducted since they weren't in the Stage 2 BUD.

<![if !supportLists]>• <![endif]>On the Consulting Personnel Costs pages, the following personnel and hours were approved by the Agency:

<![if !supportLists]>➤ <![endif]>First page, First entry
-- Only 4 hours were tasked for field preparation, scheduling, arrangements/coordination by the Senior Administrative Assistant, not the Senior Project Manager.

<![if !supportLists]>➤ <![endif]>First page, Third entry
-- The Professional Geologist was tasked with drilling/soil sampling/field prep/mobilization/drilling plan, not the Engineer III.

<![if !supportLists]>➤ <![endif]>First page, Fourth entry -- The Engineer I was tasked with groundwater sampling & surveying, not the Engineer III.

<![if !supportLists]>> <![endif]>First page, Fifth entry
-- The Professional Geologist was tasked with groundwater sampling & surveying, not the Senior Project Manager.

<![if !supportLists]>> <![endif]>Second page, sixth entry -- only 4 hours were approved for drilling plan/field prep/mobilization by the Engineer III,

<![if !supportLists]>> <![endif]>Third page, last entry -- only 3 hours were approved for Stage 2 reimbursement compilation, assembly, and distribution by the Senior Administrative Assistant,

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Thanks, Eric .

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State of Illinois -

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Kuhlman, Eric

From: Kuhlman, Eric
Sent: Friday, November 18, 2016 11:49 AM
To: 'matt@cwmcompany.com'
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Hey Matt, it occurs to me that I may not be able to get the Agency response letter signed and mailed before the due date on November 26th due to the upcoming holiday.

Therefore, I respectfully request that your client waive the right to final decision for a minimum of 60 days in accordance with 734.505(d). That way we're covered if my managers and support staff decide to take leave before the holiday. Eric

Kuhlman, Eric

From: matt@cwmcompany.com
Sent: Friday, November 18, 2016 1:34 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
Attachments: Aman Extension St3.pdf

Did you send that by accident or did you not get the copy of the extension? I re attached the extension. The me know if you got it please the hard copy will go into the EPA today

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/18/16 10:48 am
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

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CW²M Company
Environmental Consulting Services

701 W. South Grand Avenue
Springfield, IL 62704

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

November 16, 2016

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

RE: LPC #1610455194 –Rock Island County
Aman Food & Gas
1830 5th Avenue
Incident Number: 2014-0247
LUST Technical Reports—Stage 3 Site Investigation Plan and Budget
Extension for Final Decision

Dear Mr. Kuhlman,

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If you have any questions or require additional information, please contact Mr. Matt Rives or me at (217) 522-8001.

Sincerely,



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

xc: Mrs. Balbir Kaur & Mr. Jeet Singh, *Aman Food & Gas*
Mr. William T. Sinnott, *CW²M Company, Inc.*

701 W. South Grand Avenue
Springfield, IL 62704
(217) 522-8001

400 West Jackson, Suite C
Marion, IL 62959
(618) 997-2238

Kuhlman, Eric

From: Kuhlman, Eric
Sent: Friday, November 18, 2016 2:07 PM
To: 'matt@cwmcompany.com'
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Thanks, Matt. I wasn't sure if I requested an extension or not since I was out of the office yesterday.

From: matt@cwmcompany.com [<mailto:matt@cwmcompany.com>]
Sent: Friday, November 18, 2016 1:34 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Did you send that by accident or did you not get the copy of the extension? I re attached the extension. The me know if you got it please the hard copy will go into the EPA today

Matthew D. Rives

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701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/18/16 10:48 am
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

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Kuhlman, Eric

From: Kuhlman, Eric
Sent: Tuesday, November 22, 2016 2:45 PM
To: 'matt@cwmcompany.com'
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Hey Matt, after reviewing your revised budget forms for the Stage 2 Actual Costs I discovered the following discrepancies in the revised Stage 2 Budget forms:

- o the particle size analysis rate was not the agreed upon rate stated in the Stage 2 Budget dated 7/22/2015,
- o you didn't submit the revised Remediation and Disposal Costs forms,
- o entries 1-5 on the 1st page of the Consulting Personnel Costs were not the agreed Personnel titles proposed in the Stage 2 Budget dated 7/22/2015. Please note that in accordance with Section 870(d)(1), once the Agency approves a cost, the applicable maximum payment amount for the cost must not be increased (e.g. by proposing the cost in a subsequent budget), and
- o the Consultant Material Costs submitted were not the agreed upon costs stated in the Stage 2 Budget dated 7/22/2015,

So if you could correct these entries and resubmit those forms that would be great. Thanks, Eric

From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]
Sent: Tuesday, November 15, 2016 2:56 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

I am sorry I didn't realize all the rates were off I thought it was just personnel. Here is the updated sheets, and summary page.

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Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

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Sent: Monday, November 14, 2016 11:29 AM
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Cc: Carol Rowe; Colantino, Steve
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Hey Eric,

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I have attached the updated sheets with the 2015 Subpart H rates.

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I have attached the updated budget sheets with disposal removed.

- *On the Consulting Personnel Costs pages, the following personnel and hours were approved by the Agency:*
 - *➤First page, First entry -- Only 4 hours were tasked for field preparation, scheduling, arrangements/coordination by the Senior Administrative Assistant, not the Senior Project Manager.*

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Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 9/30/16 8:17 am
To: "Matt Rives" <matt@cw3mcompany.com>

Matt, you'll need to correct and re-submit the Stage 2 AC and Stage 3 BUD because of the following:

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Thanks, Eric .

P.S. In the future, could you submit the site map concerning early action sampling? Otherwise, I need to go back to previous reports and try and determine where the "hot spots" are concerning the early action samples. Please note your Stage 3 SIP is missing the cross-section map showing the geology and horizontal and vertical extent of the soil and groundwater contamination that exceeds the most stringent Tier I remediation objectives.

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Kuhlman, Eric

From: matt@cwmcompany.com
Sent: Friday, December 09, 2016 2:05 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
Attachments: Stage 2 Actual.pdf

Eric:

I have attached a new revised complete budget; sorry about that I thought it was just the Personnel rates that were at the wrong year. I also changed the material rates back to the initial proposed costs in the 2015 Stage 2 Plan. As for the personnel titles being changed per Section 870(d)(1), I believe there is some confusion on what that regulation is actually stating and what it is in reference to. I do appreciate you letting me know what regulation you are referencing for your decisions. It helps eliminate any confusion we may have and provides an understanding as to how the regulations are being utilized. If you read the paragraph under Section 734.870 Increase in Maximum Payment Amounts, it States

"The maximum payment amounts set forth in this Subpart H must be adjusted annually by an inflation factor determined by the annual Implicit Price Deflator for Gross National Product as published by the U.S. Department of Commerce in its Survey of Current Business."

And if you read the entire Section 870(d) (1), (2), and (3)

"d) Adjusted maximum payment amounts must be applied as follows:

- 1) For costs approved by the Agency in writing prior to the date the costs are incurred, the applicable maximum payment amounts must be the amounts in effect on the date the Agency received the budget in which the costs were proposed. Once the Agency approves a cost, the applicable maximum payment amount for the cost must not be increased (e.g, by proposing the cost in a subsequent budget).*
- 2) For costs not approved by the Agency in writing prior to the date the costs are incurred, including, but not limited to, early action costs, the applicable maximum payment amounts must be the amounts in effect on the date the costs were incurred.*
- 3) Owners and operators must have the burden of requesting the appropriate adjusted maximum payment amounts in budgets and applications for payment."*

The regulation is very specific to the fact that the maximum payment amount set forth in Subpart H will be adjusted Annually. The amount of each rate will be determined upon the rate in effect on the date the agency receives a budget. Conversely, 870 (d) (2), allows for maximum payment amounts to be in the amount in effect on the date the cost was incurred. The separation of the two rates has long been standing as work incurred and work proposed, specifically giving guidance to the use of maximum payment amounts, defined in subpart H.

You can see this regulation pertains to Subpart H Rate amounts and what year's rates are deemed actable (like how I am changing the personnel and analytical rates of this budget back to the 15-16 proposed rates when the plan was proposed, even though it was conducted at a later time) and has nothing to do with personnel proposed titles requirements having to match actual or how the plan is implemented and completed. As I stated in the previous e-mail during development of a proposed budget there is no way we can know exactly who will be available to perform and complete the specific tasks or activities. Available personnel at the time are used for the tasks at hand, and though their specific title may not match the proposed line item they are still a comparable title by IEPA standards to complete such task. A proposed budget is just that, a proposal or working guidelines. Per the IEPA's guidelines that is why a budget is not approved at the time the plan is approved and only includes specified language about the approval of the Stage 2 plan; and budget is "Costs must be incurred in accordance with the approved plan and must be determined in accordance with 35 Ill. Adm. Code 734.Subpart H, Appendix D, and Appendix E".

Matthew D. Rives

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----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric"
Date: 11/22/16 1:44 pm
To: "matt@cwmcompany.com"

Hey Matt, after reviewing your revised budget forms for the Stage 2 Actual Costs I discovered the following discrepancies in the revised Stage 2 Budget forms:

- o the particle size analysis rate was not the agreed upon rate stated in the Stage 2 Budget dated 7/22/2015,
- o you didn't submit the revised Remediation and Disposal Costs forms,

- o entries 1-5 on the 1st page of the Consulting Personnel Costs were not the agreed Personnel titles proposed in the Stage 2 Budget dated 7/22/2015. Please note that in accordance with Section 870(d)(1), once the Agency approves a cost, the applicable maximum payment amount for the cost must not be increased (e.g. by proposing the cost in a subsequent budget), and
- o the Consultant Material Costs submitted were not the agreed upon costs stated in the Stage 2 Budget dated 7/22/2015,

So if you could correct these entries and resubmit those forms that would be great. Thanks, Eric

From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]
Sent: Tuesday, November 15, 2016 2:56 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

I am sorry I didn't realize all the rates were off I thought it was just personnel. Here is the updated sheets, and summary page.

Matthew D. Rives

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From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/15/16 1:23 pm
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

Hey Matt, when should I expect to receive the other revised budget forms? Eric

From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]
Sent: Monday, November 14, 2016 11:29 AM
To: Kuhlman, Eric
Cc: Carol Rowe; Colantino, Steve
Subject: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Hey Eric,

I had a chance to look over your budget concerns and this is what I found.

- *The Stage 2 AC was submitted with the wrong rates, please correct and re-submit the Stage 2 AC with the 2015 Subpart H rates.*

I have attached the updated sheets with the 2015 Subpart H rates.

- *On the Remediation and Disposal Costs page, the drum disposal costs for solid water should be deducted since they weren't in the Stage 2 BUD.*

I have attached the updated budget sheets with disposal removed.

- *On the Consulting Personnel Costs pages, the following personnel and hours were approved by the Agency:*
 - *➤First page, First entry -- Only 4 hours were tasked for field preparation, scheduling, arrangements/coordination by the Senior Administrative Assistant, not the Senior Project Manager.*

We apologize this was submitted in error in the proposed budget and should have been caught. The tasks described are not acceptable for completion by a Senior Administrative Assistant and were completed by a Senior Project Manager.

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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	\$	\$	\$ 2,423.77	\$ 2,497.10	\$
Analytical Costs Form	\$	\$	\$ 1,258.96	\$ 265.32	\$
Remediation and Disposal Costs Form	\$	\$	\$	\$ 625.76	\$
UST Removal and Abandonment Costs Form	\$	\$	\$	\$	\$
Paving, Demolition, and Well Abandonment Costs Form	\$	\$	\$	\$	\$
Consulting Personnel Costs Form	\$	\$	\$ 18,330.40	\$ 35,822.81	\$
Consultant's Materials Costs Form	\$	\$	\$ 1,022.50	\$ 1,281.00	\$
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	\$	\$	\$ 23,035.63	\$ 40,491.99	\$

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	10.00	10.00	Soil Plume Delineation
1	HSA	15.00	15.00	Soil and Groundwater Plume Delineations
1	HSA	15.00	15.00	Groundwater Plume Delineation
1	PUSH	10.00	10.00	Tier 2 Analysis TACO Sample

Subpart H minimum payment amount applies.

	Total Feet	Rate per Foot (\$)	Total Cost (\$)
Total Feet via HSA:	30.00	27.94	838.20
Total Feet via PUSH:	20.00	21.87	437.40
Total Feet for Injection via PUSH:		18.23	
Total Drilling Costs:			1,822.27

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 (\$)
2	HSA	2.00	15.00	30.00

Well Installation	Total Feet	Rate per Foot (\$)	Total Cost (\$)
Total Feet via HSA:	30.00	20.05	601.50
Total Feet via PUSH:		15.18	
Total Feet of 4" or 6" Recovery:		30.38	
Total Feet of 8" or Greater Recovery:		49.81	
Total Well Costs:			601.50

Total Drilling and Monitoring Well Costs:	\$2,423.77
--	-------------------

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	5	X	12.15	=	\$60.75
Sample Shipping per sampling event ¹	2	X	60.74	=	\$121.48

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

Total Analytical Costs: \$ 1,258.96

Analytical Costs Form

Laboratory Analysis	Number of Samples		Cost (\$) per Analysis		Total per Parameter
Chemical Analysis					
BETX Soil with MTBE EPA 8260	5	X	103.26	=	\$516.30
BETX Water with MTBE EPA 8260	2	X	98.41	=	\$196.82
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	1	X	46.16	=	\$46.16
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 (ρ_b) ASTM D2937-94	1	X	26.72	=	\$26.72
Ex-situ Hydraulic Conductivity / Permeability		X		=	
Moisture Content (w) ASTM D2216-92 / D4643-93	1	X	14.58	=	\$14.58
Porosity		X		=	
Rock Hydraulic Conductivity Ex-situ		X		=	
Sieve / Particle Size Analysis ASTM D422-63 / D1140-54	1	X	176.15	=	\$176.15
Soil Classification ASTM D2488-90 / D2487-90		X		=	
Soil Particle Density (ρ_s) ASTM D854-92	1	X	100.00	=	\$100.00
		X		=	
		X		=	
		X		=	

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 (\$)
Number of Drums of Liquid Waste	Cost per Drum (\$)	Total Cost (\$)
Total Drum Disposal Costs		.00

Total Remediation and Disposal Costs:	\$.00
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Consulting Personnel Costs Form

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Senior Project Manager	5.00	121.49	\$607.45
Stage 2-Field	Field Preparation, Scheduling, Arrangements/Coordination for Investigation Activities			
	Engineer I	12.00	91.11	\$1,093.32
Stage 2-Field	Drilling/ Soil Sampling / Performing Slug Test			
	Engineer III	16.00	121.49	\$1,943.84
Stage 2-Field	Drilling/ Soil Sampling / Performing Slug Test / Field Prep / Mobilization / Drilling Plan			
	Engineer III	10.00	121.49	\$1,214.90
Stage 2-Field	Groundwater Sampling, Surveying			
	Senior Project Manager	10.00	121.49	\$1,214.90
Stage 2-Field	Groundwater Sampling, Surveying			
	Senior Project Manager	6.00	121.49	\$728.94
Stage 2-Field	Evaluate Analytical Results, Borelogs, and Well Completion Reports / SI Documentation			
	Engineer I	8.00	91.11	\$728.88
Stage 2-Field	Record Borelogs, Record Well Completion Reports, and Tabulation of Analytical Results			
	Draftperson/CAD III	5.00	60.74	\$303.70
Stage 2-Field	Field Prep Maps / Drafting for Field Activities			
	Senior Admin. Assistant	2.00	54.67	\$109.34
Stage 2-Field	Arrangements for Investigation, Utilities/JULIE, and Scheduling			

Electronic Filing: Received, Clerk's Office 4/5/2017

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Senior Project Manager	6.00	121.49	\$728.94
Stage 2-Plan	Site Investigation Plan Development Oversight/Review			
	Senior Prof. Engineer	3.00	157.94	\$473.82
Stage 2-Plan	Stage 2 Plan Certification			
	Engineer I	26.00	91.11	\$2,368.86
Stage 2-Plan	Stage 2 Plan Inputs			
	Draftperson/CAD III	5.00	60.74	\$303.70
Stage 2-Plan	Drafting/Editing of Maps			
	Engineer III	3.00	121.49	\$364.47
Stage 2-Plan	Stage 2 Plan Development / Drill Plan			
	Engineer III	6.00	121.49	\$728.94
Stage 2-Field	Drilling Plan/ Field Prep/ Mobilization			
	Senior Project Manager	6.00	121.49	\$728.94
Stage 2-Budget	Stage 2 Budget Technical Compliance and Oversight			
	Senior Prof. Engineer	2.00	157.94	\$315.88
Stage 2-Budget	Stage 2 Budget Certification			

Electronic Filing: Received, Clerk's Office 4/5/2017

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Engineer I	8.00	91.11	\$728.88
Stage 2-Budget	Stage 2 Budget Calculations and Inputs			
	Senior Admin. Assistant	2.00	54.67	\$109.34
Stage 2-Budget	Stage 2 Budget Compilation, Assembly, and Distribution			
	Senior Project Manager	10.00	121.49	\$1,214.90
Stage 2-Pay	Stage 2 Reimbursement Coordination / Oversight and Technical Compliance			
	Senior Prof. Engineer	4.00	157.49	\$629.96
Stage 2-Pay	Stage 2 Reimbursement Certification			
	Senior Acct. Technician	22.00	66.81	\$1,469.82
Stage 2-Pay	Stage 2 Reimbursement Preparation			
	Senior Admin. Assistant	4.00	54.67	\$218.68
Stage 2-Pay	Stage 2 Reimbursement Compilation, Assembly, and Distribution			

*Refer to the applicable Maximum Payment Amounts document.

Total of Consulting Personnel Costs	\$18,330.40
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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 2-Field	Detect VOC Levels in Soil Samples			
Measuring Wheel	1.00	18.00	/day	\$18.00
Stage 2-Field	Mapping Sampling Locations			
Disposable Gloves	1.00	12.00	/box	\$12.00
Stage 2-Field	Disposable Latex Gloves for Soil Sampling, Groundwater Sampling			
Mileage	680.00	.55	/mile	\$374.00
Stage 2-Field	2 Round Trip from Springfield Office to Site (Drilling/Sampling - Groundwater Sampling)			
Water Level Indicator	2.00	21.00	/day	\$42.00
Stage 2-Field	Measure Groundwater Levels During Drilling / Slug Test, Groundwater Sampling			
Survey Equipment Rental	1.00	75.00	/day	\$75.00
Stage 2-Field	Survey monitoring well elevations for groundwater flow calculations			
Copies	500.00	.15	/copy	\$75.00
Stage 2-Plan	Copies/Drafts/Forms of Stage 2 Plan / IEPA Correspondences			
Postage	2.00	6.00	/each	\$12.00
Stage 2-Plan	Stage 2 Report/Forms Distribution			
Copies	200.00	.15	/copy	\$30.00
Stage 2-Budget	Copies of Stage 2 Budget/Draft			

Electronic Filing: Received, Clerk's Office 4/5/2017

Materials, Equipment, or Field Purchase	Time or Amount Used	Rate (\$)	Unit	Total Cost
Remediation Category	Description/Justification			
Postage	2.00	6.00	/each	\$12.00
Stage 2-Budget	Stage 2 Budget/Forms Distribution			
Copies	800.00	.15	/copy	\$120.00
Stage 2-Pay	Copies of Stage 2 Reimbursement Request/Supporting Documentation			
Postage	2.00	6.00	/each	\$12.00
Stage 2-Pay	Stage 2 Forms and Reimbursement Distribution			
Copies	250.00	.15	/copy	\$37.50
Stage 2-Field	Field Preparation/Maps/Borelogs/Analytical Reports/Field Reports			
Bailers	2.00	16.00	/each	\$32.00
Stage 2-Field	Disposable Bailers for Monitoring Well Development and Sampling			
Bailing Twine	1.00	6.00	/roll	\$6.00
Stage 2-Field	String for Bailers, Well Development, and Sampling			
Slug Test	1.00	36.00	/day	\$36.00
Stage 2-Field	Materials Used to Perform Slug Test			
Total of Consultant Materials Costs				\$1,022.50

Kuhlman, Eric

From: Kuhlman, Eric
Sent: Wednesday, December 14, 2016 10:59 AM
To: Bauer, Brian P.; Dilbaitis, Bradley
Subject: FW: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
Attachments: Stage 2 Actual.pdf

I thought you should see this.

Matt still thinks that CWM can increase their rates based on when they were incurred. Do you believe this guy?

From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]
Sent: Friday, December 09, 2016 2:05 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Eric:

I have attached a new revised complete budget; sorry about that I thought it was just the Personnel rates that were at the wrong year. I also changed the material rates back to the initial proposed costs in the 2015 Stage 2 Plan. As for the personnel titles being changed per Section 870(d)(1), I believe there is some confusion on what that regulation is actually stating and what it is in reference to. I do appreciate you letting me know what regulation you are referencing for your decisions. It helps eliminate any confusion we may have and provides an understanding as to how the regulations are being utilized. If you read the paragraph under Section 734.870 Increase in Maximum Payment Amounts, it States

"The maximum payment amounts set forth in this Subpart H must be adjusted annually by an inflation factor determined by the annual Implicit Price Deflator for Gross National Product as published by the U.S. Department of Commerce in its Survey of Current Business."

And if you read the entire Section 870(d) (1), (2), and (3)

"d) Adjusted maximum payment amounts must be applied as follows:

1) For costs approved by the Agency in writing prior to the date the costs are incurred, the applicable maximum payment amounts must be the amounts in effect on the date the Agency received the budget in which the costs were proposed. Once the Agency approves a cost, the applicable maximum payment amount for the cost must not be increased (e.g, by proposing the cost in a subsequent budget).

- 2) *For costs not approved by the Agency in writing prior to the date the costs are incurred, including, but not limited to, early action costs, the applicable maximum payment amounts must be the amounts in effect on the date the costs were incurred.*
- 3) *Owners and operators must have the burden of requesting the appropriate adjusted maximum payment amounts in budgets and applications for payment."*

The regulation is very specific to the fact that the maximum payment amount set forth in Subpart H will be adjusted Annually. The amount of each rate will be determined upon the rate in effect on the date the agency receives a budget. Conversely, 870 (d) (2), allows for maximum payment amounts to be in the amount in effect on the date the cost was incurred. The separation of the two rates has long been standing as work incurred and work proposed, specifically giving guidance to the use of maximum payment amounts, defined in subpart H.

You can see this regulation pertains to Subpart H Rate amounts and what year's rates are deemed actable (like how I am changing the personnel and analytical rates of this budget back to the 15-16 proposed rates when the plan was proposed, even though it was conducted at a later time) and has nothing to do with personnel proposed titles requirements having to match actual or how the plan is implemented and completed. As I stated in the previous e-mail during development of a proposed budget there is no way we can know exactly who will be available to perform and complete the specific tasks or activities. Available personnel at the time are used for the tasks at hand, and though their specific title may not match the proposed line item they are still a comparable title by IEPA standards to complete such task. A proposed budget is just that, a proposal or working guidelines. Per the IEPA's guidelines that is why a budget is not approved at the time the plan is approved and only includes specified language about the approval of the Stage 2 plan; and budget is "Costs must be incurred in accordance with the approved plan and must be determined in accordance with 35 Ill. Adm. Code 734.Subpart H, Appendix D, and Appendix E".

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/22/16 1:44 pm
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

Hey Matt, after reviewing your revised budget forms for the Stage 2 Actual Costs I discovered the following discrepancies in the revised Stage 2 Budget forms:

the particle size analysis rate was not the agreed upon rate stated in the Stage 2 Budget dated 7/22/2015,

you didn't submit the revised Remediation and Disposal Costs forms,

entries 1-5 on the 1st page of the Consulting Personnel Costs were not the agreed Personnel titles proposed in the Stage 2 Budget dated 7/22/2015. Please note that in accordance with Section 870(d)(1), once the Agency approves a cost, the applicable maximum payment amount for the cost must not be increased (e.g. by proposing the cost in a subsequent budget), and

the Consultant Material Costs submitted were not the agreed upon costs stated in the Stage 2 Budget dated 7/22/2015,

So if you could correct these entries and resubmit those forms that would be great. Thanks, Eric

From: matt@cwmcompany.com [<mailto:matt@cwmcompany.com>]
Sent: Tuesday, November 15, 2016 2:56 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

I am sorry I didn't realize all the rates were off I thought it was just personnel. Here is the updated sheets, and summary page.

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/15/16 1:23 pm
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

Hey Matt, when should I expect to receive the other revised budget forms? Eric

From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]
Sent: Monday, November 14, 2016 11:29 AM
To: Kuhlman, Eric
Cc: Carol Rowe; Colantino, Steve
Subject: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Hey Eric,

I had a chance to look over your budget concerns and this is what I found.

- *The Stage 2 AC was submitted with the wrong rates, please correct and re-submit the Stage 2 AC with the 2015 Subpart H rates.*

I have attached the updated sheets with the 2015 Subpart H rates.

- *On the Remediation and Disposal Costs page, the drum disposal costs for solid water should be deducted since they weren't in the Stage 2 BUD.*

I have attached the updated budget sheets with disposal removed.

- *On the Consulting Personnel Costs pages, the following personnel and hours were approved by the Agency:*
 - *➤ First page, First entry -- Only 4 hours were tasked for field preparation, scheduling, arrangements/coordination by the Senior Administrative Assistant, not the Senior Project Manager.*

We apologize this was submitted in error in the proposed budget and should have been caught. The tasks described are not acceptable for completion by a

Senior Administrative Assistant and were completed by a Senior Project Manager.

- ➤ *First page, Third entry -- The Professional Geologist was tasked with drilling/soil sampling/field prep/mobilization/drilling plan, not the Engineer III.*

A Professional Geologist and Engineer III were proposed for drilling/ sampling and an Engineer I and Engineer III actually completed the task. During development of a proposed budget there is no way we can know exactly who will be available to perform and complete the specific tasks or activities. Available personnel at the time are used for the tasks at hand, and though their specific title may not match the proposed line item they are still a comparable title by IEPA standards to complete such task. Also, in this situation personnel costs that add up to a lower total then proposed were used along with completing the task in less time than proposed.

- ➤ *First page, Fourth entry -- The Engineer I was tasked with groundwater sampling & surveying, not the Engineer III .*
- ➤ *First page, Fifth entry -- The Professional Geologist was tasked with groundwater sampling & surveying, not the Senior Project Manager.*

During development of a proposed budget there is no way we can know exactly who will be available to perform and complete the specific tasks or activities. Specifically in this situation, where we proposed work that was completed nine months after the proposed budget was submitted. Available personnel at the time are used for the tasks at hand, and though their specific title may not match the proposed line item they are still a comparable title by IEPA standards to complete such task. Also, even though the Engineer III and Senior Project Manager did the work they were able to do it in a shorter amount of time than proposed, making the line item under the proposed cost for that task.

- ➤ *Second page, sixth entry -- only 4 hours were approved for drilling plan/field prep/mobilization by the Engineer III,*

Not all actual line items should be expected to come in under the proposed as it is proposed budget of expected costs, and the actual budget should reflect the actual cost incurred. Due to our experience and expertise, most items closely resemble the proposed budget; but may be slightly different when the works actually completed. Our due diligence and ability to reduce costs should not result in the denial of work on a specific line item's time that was actual required to complete the task. The regulatory intent of the proposal budget was to provide consultants and owner operators approval of costs in stages and the proposal was to be an estimate of likely cost, followed by actual costs for which the agency would approve as the budget. If this wasn't the case it would require us to propose and the IEPA to deem acceptable the extreme worst case scenario hours

for every task. We both know that would not be acceptable to the IEPA. The purpose of the actual budget is to help the IEPA flag/quickly notice costs that are exorbitantly higher than what was previously proposed allowing the IEPA to ask for clarification on the large amount of cost. In this case the extra two hours that were actually required for drill plan/ field prep were due to the fact that a major gas main utility was located in the vicinity of SB-4. This required extra correspondence with multiple utility personnel for location of this main and set up of drilling with them on site.

- *➤Third page, last entry -- only 3 hours were approved for Stage 2 reimbursement compilation, assembly, and distribution by the Senior Administrative Assistant,*

Not all actual line items should be expected to come in under the proposed as it is proposed budget of expected costs, and the actual budget should reflect the actual cost incurred. Due to our experience and expertise, most items closely resemble the proposed budget; but may be slightly different when the works actually completed. Our due diligence and ability to reduce costs should not result in the denial of work on a specific line item's time that was actual required to complete the task. The regulatory intent of the proposal budget was to provide consultants and owner operators approval of costs in stages and the proposal was to be an estimate of likely cost, followed by actual costs for which the agency would approve as the budget. If this wasn't the case it would require us to propose and the IEPA to deem acceptable the extreme worst case scenario hours for every task. We both know that would not be acceptable to the IEPA. The purpose of the actual budget is to help the IEPA flag/quickly notice costs that are exorbitantly higher than what was previously proposed allowing the IEPA to ask for clarification on the large amount of cost. In this case the hour that will be required for compilation assembly and distribution of the Stage 2 reimbursement does not require a denial or a need for explanation of extra hours. The explanation is simply that is the time it will take to complete a review.

- *Please be aware you'll need to justify the consultant's material costs in both the Stage 2 AC and Stage 3 BUD*

We have answered these questions plenty of times in a multitude of ways to you and other project managers. We have found that the agency has established new rates, which are less than ours in some cases and it doesn't matter what we submit for reasonableness of the rates. We believe this issue will be addressed in the appeals currently in process and a budget amendment for approved cost can be established then. This helps move the projects forward, remove wasted time for correspondence and removes any possible animosity or frustration that may be accrued between us and project managers.

- *Could you also explain what "Materials used to perform slug test"? Cause I have no idea what you're talking about.*

The materials used for a slug test are the slug and data logging materials. If you are not familiar with how a slug test is performed and material required you can reference ASTM 4044/4044M for clarification.

- *There's also a mathematical error in your mileage, Google Maps has the distance from CWM in Spgfd to the site as 165 miles.*

I see no error with your actual. When I typed the site addresses and your office location in to Google Maps it came up with 167 miles. This of course doesn't include the extra distance for stopping for fuel, bathroom breaks and lunch. This extra distance can be an extra 10% approximately. So with a total of 2 round trips 735 mile could be expected for travel to and from site. Your actual is well below that, and actually only 12 miles (6 miles per round trip) for the extra distance included for fuel, bathroom breaks and lunch.

A proposed budget is just that, a proposal or working guidelines of anticipated costs. Per the IEPA's guidelines that is why a budget is not approved at the time the plan is approved and only includes specified language about the approval of the Stage 2 plan; and budget is "Costs must be incurred in accordance with the approved plan and must be determined in accordance with 35 Ill. Adm. Code 734. Subpart H, Appendix D, and Appendix E".

While every individual line item may not come under the proposed amount, it can be reasonably expected that each subsection, task / phase code should come under or within a marginally increased amount when the actual amounts have been incurred and presented as the actual budget. We can plan and develop a budget with an expectation of which personnel may conduct itemized tasks. However, because of workloads, field demands etc, some tasks are completed by other equally qualified and competent personnel, all within Subpart H rates. Should the actual budget show significant deviation in time and effort, a justification would then be in order. Our best guideline is the Agency's letter approving plans, the Agency's treatment of proposed vs actual budget on prior sites

To report anything for reimbursement other than our true actual would just be wrong and not match the technical report either. We review the totals for each subsection completed to verify if actual is under or over within reasonable margins of the proposed. This is truly the only way to give the Agency reasonable budgets. For this project the complete total amount proposed for personnel of the two plans was \$26,588.02 and actual costs of \$18,330.40 a 31% decrease from proposed to actual.

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 9/30/16 8:17 am
To: "Matt Rives" <matt@cw3mcompany.com>

Matt, you'll need to correct and re-submit the Stage 2 AC and Stage 3 BUD because of the following:

- The Stage 2 AC was submitted with the wrong rates, please correct and re-submit the Stage 2 AC with the 2015 Subpart H rates.
- On the Remediation and Disposal Costs page, the drum disposal costs for solid water should be deducted since they weren't in the Stage 2 BUD.
- On the Consulting Personnel Costs pages, the following personnel and hours were approved by the Agency:
 - First page, First entry -- Only 4 hours were tasked for field preparation, scheduling, arrangements/coordination by the Senior Administrative Assistant, not the Senior Project Manager.
 - First page, Third entry -- The Professional Geologist was tasked with drilling/soil sampling/field prep/mobilization/drilling plan, not the Engineer III.
 - First page, Fourth entry -- The Engineer I was tasked with groundwater sampling & surveying, not the Engineer III.

First page, Fifth entry -- The Professional Geologist was tasked with groundwater sampling & surveying, not the Senior Project Manager.

Second page, sixth entry -- only 4 hours were approved for drilling plan/field prep/mobilization by the Engineer III,

Third page, last entry -- only 3 hours were approved for Stage 2 reimbursement compilation, assembly, and distribution by the Senior Administrative Assistant,

Please be aware you'll need to justify the consultant's material costs in both the Stage 2 AC and Stage 3 BUD.

Could you also explain what "Materials used to perform slug test" ? Cause I have no idea what you're talking about.

There's also a mathematical error in your mileage, Google Maps has the distance from CWM in Spgfd to the site as 165 miles.

Thanks, Eric .

P.S. In the future, could you submit the site map concerning early action sampling? Otherwise, I need to go back to previous reports and try and determine where the "hot spots" are concerning the early action samples. Please note your Stage 3 SIP is missing the cross-section map showing the geology and horizontal and vertical extent of the soil and groundwater contamination that exceeds the most stringent Tier I remediation objectives.

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disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.

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	\$	\$	\$ 2,423.77	\$ 2,497.10	\$
Analytical Costs Form	\$	\$	\$ 1,258.96	\$ 265.32	\$
Remediation and Disposal Costs Form	\$	\$	\$	\$ 625.76	\$
UST Removal and Abandonment Costs Form	\$	\$	\$	\$	\$
Paving, Demolition, and Well Abandonment Costs Form	\$	\$	\$	\$	\$
Consulting Personnel Costs Form	\$	\$	\$ 18,330.40	\$ 35,822.81	\$
Consultant's Materials Costs Form	\$	\$	\$ 1,022.50	\$ 1,281.00	\$
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	\$	\$	\$ 23,035.63	\$ 40,491.99	\$

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	10.00	10.00	Soil Plume Delineation
1	HSA	15.00	15.00	Soil and Groundwater Plume Delineations
1	HSA	15.00	15.00	Groundwater Plume Delineation
1	PUSH	10.00	10.00	Tier 2 Analysis TACO Sample

Subpart H minimum payment amount applies.

	Total Feet	Rate per Foot (\$)	Total Cost (\$)
Total Feet via HSA:	30.00	27.94	838.20
Total Feet via PUSH:	20.00	21.87	437.40
Total Feet for Injection via PUSH:		18.23	
Total Drilling Costs:			1,822.27

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 (\$)
2	HSA	2.00	15.00	30.00

Well Installation	Total Feet	Rate per Foot (\$)	Total Cost (\$)
Total Feet via HSA:	30.00	20.05	601.50
Total Feet via PUSH:		15.18	
Total Feet of 4" or 6" Recovery:		30.38	
Total Feet of 8" or Greater Recovery:		49.81	
Total Well Costs:			601.50

Total Drilling and Monitoring Well Costs:	\$2,423.77
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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	5	X	12.15	=	\$60.75
Sample Shipping per sampling event ¹	2	X	60.74	=	\$121.48

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

Total Analytical Costs: \$ 1,258.96

Analytical Costs Form

Laboratory Analysis	Number of Samples		Cost (\$) per Analysis		Total per Parameter
Chemical Analysis					
BETX Soil with MTBE EPA 8260	5	X	103.26	=	\$516.30
BETX Water with MTBE EPA 8260	2	X	98.41	=	\$196.82
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	1	X	46.16	=	\$46.16
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	1	X	26.72	=	\$26.72
Ex-situ Hydraulic Conductivity / Permeability		X		=	
Moisture Content (w) ASTM D2216-92 / D4643-93	1	X	14.58	=	\$14.58
Porosity		X		=	
Rock Hydraulic Conductivity Ex-situ		X		=	
Sieve / Particle Size Analysis ASTM D422-63 / D1140-54	1	X	176.15	=	\$176.15
Soil Classification ASTM D2488-90 / D2487-90		X		=	
Soil Particle Density (p_s) ASTM D854-92	1	X	100.00	=	\$100.00
		X		=	
		X		=	
		X		=	

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 (\$)
Number of Drums of Liquid Waste	Cost per Drum (\$)	Total Cost (\$)
Total Drum Disposal Costs		.00

Total Remediation and Disposal Costs:	\$.00
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Consulting Personnel Costs Form

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Senior Project Manager	5.00	121.49	\$607.45
Stage 2-Field	Field Preparation, Scheduling, Arrangements/Coordination for Investigation Activities			
	Engineer I	12.00	91.11	\$1,093.32
Stage 2-Field	Drilling/ Soil Sampling / Performing Slug Test			
	Engineer III	16.00	121.49	\$1,943.84
Stage 2-Field	Drilling/ Soil Sampling / Performing Slug Test / Field Prep / Mobilization / Drilling Plan			
	Engineer III	10.00	121.49	\$1,214.90
Stage 2-Field	Groundwater Sampling, Surveying			
	Senior Project Manager	10.00	121.49	\$1,214.90
Stage 2-Field	Groundwater Sampling, Surveying			
	Senior Project Manager	6.00	121.49	\$728.94
Stage 2-Field	Evaluate Analytical Results, Borelogs, and Well Completion Reports / SI Documentation			
	Engineer I	8.00	91.11	\$728.88
Stage 2-Field	Record Borelogs, Record Well Completion Reports, and Tabulation of Analytical Results			
	Draftperson/CAD III	5.00	60.74	\$303.70
Stage 2-Field	Field Prep Maps / Drafting for Field Activities			
	Senior Admin. Assistant	2.00	54.67	\$109.34
Stage 2-Field	Arrangements for Investigation, Utilities/JULIE, and Scheduling			

Electronic Filing: Received, Clerk's Office 4/5/2017

Employee Name		Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task				
		Senior Project Manager	6.00	121.49	\$728.94
Stage 2-Plan	Site Investigation Plan Development Oversight/Review				
		Senior Prof. Engineer	3.00	157.94	\$473.82
Stage 2-Plan	Stage 2 Plan Certification				
		Engineer I	26.00	91.11	\$2,368.86
Stage 2-Plan	Stage 2 Plan Inputs				
		Draftperson/CAD III	5.00	60.74	\$303.70
Stage 2-Plan	Drafting/Editing of Maps				
		Engineer III	3.00	121.49	\$364.47
Stage 2-Plan	Stage 2 Plan Development / Drill Plan				
		Engineer III	6.00	121.49	\$728.94
Stage 2-Field	Drilling Plan/ Field Prep/ Mobilization				
		Senior Project Manager	6.00	121.49	\$728.94
Stage 2-Budget	Stage 2 Budget Technical Compliance and Oversight				
		Senior Prof. Engineer	2.00	157.94	\$315.88
Stage 2-Budget	Stage 2 Budget Certification				

Electronic Filing: Received, Clerk's Office 4/5/2017

Employee Name	Personnel Title	Hours	Rate* (\$)	Total Cost
Remediation Category	Task			
	Engineer I	8.00	91.11	\$728.88
Stage 2-Budget	Stage 2 Budget Calculations and Inputs			
	Senior Admin. Assistant	2.00	54.67	\$109.34
Stage 2-Budget	Stage 2 Budget Compilation, Assembly, and Distribution			
	Senior Project Manager	10.00	121.49	\$1,214.90
Stage 2-Pay	Stage 2 Reimbursement Coordination / Oversight and Technical Compliance			
	Senior Prof. Engineer	4.00	157.49	\$629.96
Stage 2-Pay	Stage 2 Reimbursement Certification			
	Senior Acct. Technician	22.00	66.81	\$1,469.82
Stage 2-Pay	Stage 2 Reimbursement Preparation			
	Senior Admin. Assistant	4.00	54.67	\$218.68
Stage 2-Pay	Stage 2 Reimbursement Compilation, Assembly, and Distribution			

*Refer to the applicable Maximum Payment Amounts document.

Total of Consulting Personnel Costs	\$18,330.40
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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 2-Field	Detect VOC Levels in Soil Samples			
Measuring Wheel	1.00	18.00	/day	\$18.00
Stage 2-Field	Mapping Sampling Locations			
Disposable Gloves	1.00	12.00	/box	\$12.00
Stage 2-Field	Disposable Latex Gloves for Soil Sampling, Groundwater Sampling			
Mileage	680.00	.55	/mile	\$374.00
Stage 2-Field	2 Round Trip from Springfield Office to Site (Drilling/Sampling - Groundwater Sampling)			
Water Level Indicator	2.00	21.00	/day	\$42.00
Stage 2-Field	Measure Groundwater Levels During Drilling / Slug Test, Groundwater Sampling			
Survey Equipment Rental	1.00	75.00	/day	\$75.00
Stage 2-Field	Survey monitoring well elevations for groundwater flow calculations			
Copies	500.00	.15	/copy	\$75.00
Stage 2-Plan	Copies/Drafts/Forms of Stage 2 Plan / IEPA Correspondences			
Postage	2.00	6.00	/each	\$12.00
Stage 2-Plan	Stage 2 Report/Forms Distribution			
Copies	200.00	.15	/copy	\$30.00
Stage 2-Budget	Copies of Stage 2 Budget/Draft			

Electronic Filing: Received, Clerk's Office 4/5/2017

Materials, Equipment, or Field Purchase	Time or Amount Used	Rate (\$)	Unit	Total Cost
Remediation Category	Description/Justification			
Postage	2.00	6.00	/each	\$12.00
Stage 2-Budget	Stage 2 Budget/Forms Distribution			
Copies	800.00	.15	/copy	\$120.00
Stage 2-Pay	Copies of Stage 2 Reimbursement Request/Supporting Documentation			
Postage	2.00	6.00	/each	\$12.00
Stage 2-Pay	Stage 2 Forms and Reimbursement Distribution			
Copies	250.00	.15	/copy	\$37.50
Stage 2-Field	Field Preparation/Maps/Borelogs/Analytical Reports/Field Reports			
Bailers	2.00	16.00	/each	\$32.00
Stage 2-Field	Disposable Bailers for Monitoring Well Development and Sampling			
Bailing Twine	1.00	6.00	/roll	\$6.00
Stage 2-Field	String for Bailers, Well Development, and Sampling			
Slug Test	1.00	36.00	/day	\$36.00
Stage 2-Field	Materials Used to Perform Slug Test			
Total of Consultant Materials Costs				\$1,022.50

Kuhlman, Eric

From: Dilbaitis, Bradley
Sent: Wednesday, December 14, 2016 11:18 AM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

He's ignoring the fact that he submitted a proposed budget in 2015 when he mentions 870(d)(2). That has nothing to do with anything except early action and work performed without a proposed budget. If they want the rates in effect when the work is done then they shouldn't bother submitting a proposed budget with their plan. But, if they do it that way, they won't get paid for the preparation of 2 budgets.

From: Kuhlman, Eric
Sent: Wednesday, December 14, 2016 10:59 AM
To: Bauer, Brian P.; Dilbaitis, Bradley
Subject: FW: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

I thought you should see this.

Matt still thinks that CWM can increase their rates based on when they were incurred. Do you believe this guy?

From: matt@cwmcompany.com [<mailto:matt@cwmcompany.com>]
Sent: Friday, December 09, 2016 2:05 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Eric:

I have attached a new revised complete budget; sorry about that I thought it was just the Personnel rates that were at the wrong year. I also changed the material rates back to the initial proposed costs in the 2015 Stage 2 Plan. As for the personnel titles being changed per Section 870(d)(1), I believe there is some confusion on what that regulation is actually stating and what it is in reference to. I do appreciate you letting me know what regulation you are referencing for your decisions. It helps eliminate any confusion we may have and provides an understanding as to how the regulations are being utilized. If you read the paragraph under Section 734.870 Increase in Maximum Payment Amounts, it States

"The maximum payment amounts set forth in this Subpart H must be adjusted annually by an inflation factor determined by the annual Implicit Price Deflator for Gross National Product as published by the U.S. Department of Commerce in its Survey of Current Business."

And if you read the entire Section 870(d) (1), (2), and (3)

"d) Adjusted maximum payment amounts must be applied as follows:

- 1) *For costs approved by the Agency in writing prior to the date the costs are incurred, the applicable maximum payment amounts must be the amounts in effect on the date the Agency received the budget in which the costs were proposed. Once the Agency approves a cost, the applicable maximum payment amount for the cost must not be increased (e.g, by proposing the cost in a subsequent budget).*
- 2) *For costs not approved by the Agency in writing prior to the date the costs are incurred, including, but not limited to, early action costs, the applicable maximum payment amounts must be the amounts in effect on the date the costs were incurred.*
- 3) *Owners and operators must have the burden of requesting the appropriate adjusted maximum payment amounts in budgets and applications for payment."*

The regulation is very specific to the fact that the maximum payment amount set forth in Subpart H will be adjusted Annually. The amount of each rate will be determined upon the rate in effect on the date the agency receives a budget. Conversely, 870 (d) (2), allows for maximum payment amounts to be in the amount in effect on the date the cost was incurred. The separation of the two rates has long been standing as work incurred and work proposed, specifically giving guidance to the use of maximum payment amounts, defined in subpart H.

You can see this regulation pertains to Subpart H Rate amounts and what year's rates are deemed actable (like how I am changing the personnel and analytical rates of this budget back to the 15-16 proposed rates when the plan was proposed, even though it was conducted at a later time) and has nothing to do with personnel proposed titles requirements having to match actual or how the plan is implemented and completed. As I stated in the previous e-mail during development of a proposed budget there is no way we can know exactly who will be available to perform and complete the specific tasks or activities. Available personnel at the time are used for the tasks at hand, and though their specific title may not match the proposed line item they are still a comparable title by IEPA standards to complete such task. A proposed budget is just that, a proposal or working guidelines. Per the IEPA's guidelines that is why a budget is not approved at the time the plan is approved and only includes specified language about the approval of the Stage 2 plan; and budget is "Costs must be incurred in accordance with the approved plan and must be determined in accordance with 35 Ill. Adm. Code 734.Subpart H, Appendix D, and Appendix E".

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.

Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/22/16 1:44 pm
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

Hey Matt, after reviewing your revised budget forms for the Stage 2 Actual Costs I discovered the following discrepancies in the revised Stage 2 Budget forms:

<![if !supportLists]>○ <![endif]>the particle size analysis rate was not the agreed upon rate stated in the Stage 2 Budget dated 7/22/2015,

<![if !supportLists]>○ <![endif]>you didn't submit the revised Remediation and Disposal Costs forms,

<![if !supportLists]>○ <![endif]>entries 1-5 on the 1st page of the Consulting Personnel Costs were not the agreed Personnel titles proposed in the Stage 2 Budget dated 7/22/2015. Please note that in accordance with Section 870(d)(1), once the Agency approves a cost, the applicable maximum payment amount for the cost must not be increased (e.g. by proposing the cost in a subsequent budget), and

<![if !supportLists]>○ <![endif]>the Consultant Material Costs submitted were not the agreed upon costs stated in the Stage 2 Budget dated 7/22/2015,

So if you could correct these entries and resubmit those forms that would be great. Thanks, Eric

From: matt@cwmcompany.com [<mailto:matt@cwmcompany.com>]
Sent: Tuesday, November 15, 2016 2:56 PM
To: Kuhlman, Eric
Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

I am sorry I didn't realize all the rates were off I thought it was just personnel. Here is the updated sheets, and summary page.

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: RE: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 11/15/16 1:23 pm
To: "matt@cwmcompany.com" <matt@cwmcompany.com>

Hey Matt, when should I expect to receive the other revised budget forms? Eric

From: matt@cwmcompany.com [mailto:matt@cwmcompany.com]
Sent: Monday, November 14, 2016 11:29 AM
To: Kuhlman, Eric
Cc: Carol Rowe; Colantino, Steve
Subject: [External] RE: Aman Food & Gas -- LUST Incident #2014 0247

Hey Eric,

I had a chance to look over your budget concerns and this is what I found,

- *The Stage 2 AC was submitted with the wrong rates, please correct and re-submit the Stage 2 AC with the 2015 Subpart H rates.*

I have attached the updated sheets with the 2015 Subpart H rates.

- *On the Remediation and Disposal Costs page, the drum disposal costs for solid water should be deducted since they weren't in the Stage 2 BUD.*

I have attached the updated budget sheets with disposal removed.

- *On the Consulting Personnel Costs pages, the following personnel and hours were approved by the Agency:*
 - *➤First page, First entry -- Only 4 hours were tasked for field preparation, scheduling, arrangements/coordination by the Senior Administrative Assistant, not the Senior Project Manager.*

We apologize this was submitted in error in the proposed budget and should have been caught. The tasks described are not acceptable for completion by a Senior Administrative Assistant and were completed by a Senior Project Manager.

- *➤First page, Third entry -- The Professional Geologist was tasked with drilling/soil sampling/field prep/mobilization/drilling plan, not the Engineer III.*

A Professional Geologist and Engineer III were proposed for drilling/ sampling and an Engineer I and Engineer III actually completed the task. During development of a proposed budget there is no way we can know exactly who will be available to perform and complete the specific tasks or activities. Available personnel at the time are used for the tasks at hand, and though their specific title may not match the proposed line item they are still a comparable title by IEPA standards to complete such task. Also, in this situation personnel costs that add up to a lower total than proposed were used along with completing the task in less time than proposed.

- *➤First page, Fourth entry -- The Engineer I was tasked with groundwater sampling & surveying, not the Engineer III .*
- *➤First page, Fifth entry -- The Professional Geologist was tasked with groundwater sampling & surveying, not the Senior Project Manager.*

During development of a proposed budget there is no way we can know exactly who will be available to perform and complete the specific tasks or activities. Specifically in this situation, where we proposed work that was completed nine months after the proposed budget was submitted. Available personnel at the time are used for the tasks at hand, and though their specific title may not match the proposed line item they are still a comparable title by IEPA standards to complete such task. Also, even though the Engineer III and Senior Project Manager did the work they were able to do it in a shorter amount of time than proposed, making the line item under the proposed cost for that task.

- *➤Second page, sixth entry -- only 4 hours were approved for drilling plan/field prep/mobilization by the Engineer III,*

Not all actual line items should be expected to come in under the proposed as it is proposed budget of expected costs, and the actual budget should reflect the

actual cost incurred. Due to our experience and expertise, most items closely resemble the proposed budget; but may be slightly different when the works actually completed. Our due diligence and ability to reduce costs should not result in the denial of work on a specific line item's time that was actual required to complete the task. The regulatory intent of the proposal budget was to provide consultants and owner operators approval of costs in stages and the proposal was to be an estimate of likely cost, followed by actual costs for which the agency would approve as the budget. If this wasn't the case it would require us to propose and the IEPA to deem acceptable the extreme worst case scenario hours for every task. We both know that would not be acceptable to the IEPA. The purpose of the actual budget is to help the IEPA flag/quickly notice costs that are exorbitantly higher than what was previously proposed allowing the IEPA to ask for clarification on the large amount of cost. In this case the extra two hours that were actually required for drill plan/ field prep were due to the fact that a major gas main utility was located in the vicinity of SB-4. This required extra correspondence with multiple utility personnel for location of this main and set up of drilling with them on site.

- *➤Third page, last entry -- only 3 hours were approved for Stage 2 reimbursement compilation, assembly, and distribution by the Senior Administrative Assistant,*

Not all actual line items should be expected to come in under the proposed as it is proposed budget of expected costs, and the actual budget should reflect the actual cost incurred. Due to our experience and expertise, most items closely resemble the proposed budget; but may be slightly different when the works actually completed. Our due diligence and ability to reduce costs should not result in the denial of work on a specific line item's time that was actual required to complete the task. The regulatory intent of the proposal budget was to provide consultants and owner operators approval of costs in stages and the proposal was to be an estimate of likely cost, followed by actual costs for which the agency would approve as the budget. If this wasn't the case it would require us to propose and the IEPA to deem acceptable the extreme worst case scenario hours for every task. We both know that would not be acceptable to the IEPA. The purpose of the actual budget is to help the IEPA flag/quickly notice costs that are exorbitantly higher than what was previously proposed allowing the IEPA to ask for clarification on the large amount of cost. In this case the hour that will be required for compilation assembly and distribution of the Stage 2 reimbursement does not require a denial or a need for explanation of extra hours. The explanation is simply that is the time it will take to complete a review.

- *Please be aware you'll need to justify the consultant's material costs in both the Stage 2 AC and Stage 3 BUD*

We have answered these questions plenty of times in a multitude of ways to you and other project managers. We have found that the agency has established new rates, which are less than ours in some cases and it doesn't matter what we submit for reasonableness of the rates. We believe this issue will be addressed in the appeals currently in process and a budget amendment for approved cost can be established then. This helps move the projects forward, remove wasted time for correspondence and removes any possible animosity or frustration that may be accrued between us and project managers.

- *Could you also explain what "Materials used to perform slug test"? Cause I have no idea what you're talking about.*

The materials used for a slug test are the slug and data logging materials. If you are not familiar with how a slug test is performed and material required you can reference ASTM 4044/4044M for clarification.

- *There's also a mathematical error in your mileage, Google Maps has the distance from CWM in Spgfd to the site as 165 miles.*

I see no error with your actual. When I typed the site addresses and your office location in to Google Maps it came up with 167 miles. This of course doesn't include the extra distance for stopping for fuel, bathroom breaks and lunch. This extra distance can be an extra 10% approximately. So with a total of 2 round trips 735 mile could be expected for travel to and from site. Your actual is well below that, and actually only 12 miles (6 miles per round trip) for the extra distance included for fuel, bathroom breaks and lunch.

A proposed budget is just that, a proposal or working guidelines of anticipated costs. Per the IEPA's guidelines that is why a budget is not approved at the time the plan is approved and only includes specified language about the approval of the Stage 2 plan; and budget is "Costs must be incurred in accordance with the approved plan and must be determined in accordance with 35 Ill. Adm. Code 734, Subpart H, Appendix D, and Appendix E".

While every individual line item may not come under the proposed amount, it can be reasonably expected that each subsection, task / phase code should come under or within a marginally increased amount when the actual amounts have been incurred and presented as the actual budget. We can plan and develop a budget with an expectation of which personnel may conduct itemized tasks. However, because of workloads, field demands etc, some tasks are completed by other equally qualified and competent personnel, all within Subpart H rates. Should the actual budget show significant deviation in time and effort, a justification would then be in order. Our best guideline is the Agency's letter approving plans, the Agency's treatment of proposed vs actual budget on prior sites

To report anything for reimbursement other than our true actual would just be wrong and not match the technical report either. We review the totals for each subsection completed to verify if actual is under or over within reasonable margins of the proposed. This is truly the only way to give the Agency reasonable budgets. For this project the complete total amount proposed for personnel of the two plans was \$26,588.02 and actual costs of \$18,330.40 a 31% decrease from proposed to actual.

Matthew D. Rives

CW3M Company, Inc.
701 W. South Grand Ave.
Springfield, IL 62704
p: (217) 522-8001
f: (217) 522-8009

----- Original Message -----

Subject: Aman Food & Gas -- LUST Incident #2014 0247
From: "Kuhlman, Eric" <Eric.Kuhlman@Illinois.gov>
Date: 9/30/16 8:17 am
To: "Matt Rives" <matt@cwmccompany.com>

Matt, you'll need to correct and re-submit the Stage 2 AC and Stage 3 BUD because of the following:

<![if !supportLists]>• <![endif]>The Stage 2 AC was submitted with the wrong rates, please correct and re-submit the Stage 2 AC with the 2015 Subpart H rates.

<![if !supportLists]>• <![endif]>On the Remediation and Disposal Costs page, the drum disposal costs for solid water should be deducted since they weren't in the Stage 2 BUD.

<![if !supportLists]>• <![endif]>On the Consulting Personnel Costs pages, the following personnel and hours were approved by the Agency:

<![if !supportLists]>> <![endif]>First page, First entry --
Only 4 hours were tasked for field preparation,
scheduling, arrangements/coordination by the Senior
Administrative Assistant, not the Senior Project Manager.

<![if !supportLists]>> <![endif]>First page, Third entry --
The Professional Geologist was tasked with drilling/soil
sampling/field prep/mobilization/drilling plan, not the
Engineer III.

<![if !supportLists]>> <![endif]>First page, Fourth entry --
The Engineer I was tasked with groundwater sampling &
surveying, not the Engineer III .

<![if !supportLists]>> <![endif]>First page, Fifth entry --
The Professional Geologist was tasked with groundwater
sampling & surveying, not the Senior Project Manager.

<![if !supportLists]>> <![endif]>Second page, sixth entry --
only 4 hours were approved for drilling plan/field
prep/mobilization by the Engineer III,

<![if !supportLists]>> <![endif]>Third page, last entry --
only 3 hours were approved for Stage 2 reimbursement
compilation, assembly, and distribution by the Senior
Administrative Assistant,

<![if !supportLists]>• <![endif]>Please be aware you'll need to justify the
consultant's material costs in both the Stage 2 AC and Stage 3 BUD.

<![if !supportLists]>• <![endif]>Could you also explain what "Materials
used to perform slug test" ? Cause I have no idea what you're talking
about.

<![if !supportLists]>• <![endif]>There's also a mathematical error in
your mileage, Google Maps has the distance from CWM in Spgfd to the
site as 165 miles.

Thanks, Eric .

P.S. In the future, could you submit the site map concerning early action sampling? Otherwise, I need to go back to previous reports and try and determine where the "hot spots" are concerning the early action samples. Please note your Stage 3 SIP is missing the cross-section map showing the geology and horizontal and vertical extent of the soil and groundwater contamination that exceeds the most stringent Tier I remediation objectives.

State of Illinois - CONFIDENTIALITY NOTICE: The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.

Kuhlman, Eric

From: Kuhlman, Eric
Sent: Tuesday, January 10, 2017 10:42 AM
To: 'Matthew Rives'
Subject: RE: [External] Aman food and gas

Currently, it's under review.

Right now, I'm trying to find at what depths the early action samples dated 5-5-2014 were collected. However, the sample depths were not included on the tabular summary for the early action analytical results and there's no cross-sectional map showing the geology and extents of soil and groundwater contamination.

From: Matthew Rives [<mailto:matt@cwmccompany.com>]
Sent: Monday, January 09, 2017 11:30 AM
To: Kuhlman, Eric
Subject: [External] Aman food and gas

Hey Eric,
Now that the holidays are over was looking for a update on the stage three approval for Aman?

Sent via the Samsung GALAXY S@4, an AT&T 4G LTE smartphone

Kuhlman, Eric

From: Kuhlman, Eric
Sent: Tuesday, January 10, 2017 1:40 PM
To: Colantino, Steve
Subject: RE: [External] Aman food and gas

Steve, I just got off the phone and I need to take a walk around the block. I'll be back in 15 minutes. Eric

From: Matthew Rives [<mailto:matt@cwmcompany.com>]
Sent: Monday, January 09, 2017 11:30 AM
To: Kuhlman, Eric
Subject: [External] Aman food and gas

Hey Eric,
Now that the holidays are over was looking for a update on the stage three approval for Aman?

Sent via the Samsung GALAXY S@4, an AT&T 4G LTE smartphone

LEAKING UST TECHNICAL REVIEW NOTES

Reviewed by: Eric Kuhlman

Re: LPC #1610455194 – Rock Island County
Moline / Aman Food & Gas
1830 5th Avenue
Leaking UST Incident No. #20140247
Leaking UST Technical File

Date Reviewed: 1-10-2017

Document(s) Reviewed:

S3 SIP / S2 AC / S3 BUD

General Site Information:

Site subject to: 734

IEMA date(s): 3-3-2014	Payment from the Fund? (Y/N/unknown): U
UST system removed? (Y/N): N	OSFM Fac. ID #: 3-008580
Encountered groundwater? (Y/N/U): Y	SWAP mapping and evaluation completion date: 8-28-2014
Free product? (Y/N/unknown): N	Site placement correct in SWAP? (Y/N): Y
Current/past land use: convenience store /	MTBE > 40 ppb in groundwater? (Y/N/U): U
Size & product of USTs: (1) 5,000 gallon gasoline, (1) 3,000 gallon gasoline, (1) 4,000 gallon gasoline	
Is site located in EJ area? Y	Is investigation of indoor inhalation exposure route required? N

BOL File Information:(optional) (Arranged chronologically):

On 3-3-2014, two (2) waste characterization borings {**WC-1, WC-2**} were advanced to depths of 10 feet bgs. Two (2) soil samples were collected and analyzed for BETX/MTBE. Analytical results indicated COCs > Tier I SROs for **Csat** in WC-1 8'(X); **CW Inh** in WC-1 8'(BETX), WC-2 3'(X); **R Inh** in WC-1 8'(BX); **SCGI** in WC-1 8'(BETX), WC-2 3'(B).

The ISGS Circular 532, also known as the "Berg Circular" indicates this site is located within an area classified as "C5", a predominantly till with discontinuous sand and gravel locally present within fifty feet of the surface.

On 5-1-2014, three (3) underground storage tanks (USTs) along with the product piping were removed from the site. Approximately 771 tons (514 cubic yards) of contaminated backfill was excavated, removed, and disposed offsite. Seventeen (17) soil samples were collected from excavation walls, piping trench and floor beneath each tank; then analyzed for BETX/MTBE. Analytical results indicated COCs > Tier I SROs for **R Ing** in 8(B); **CW Inh** in 1(B), 2(X), 3(BX), 4(X), 7(X), 8(BTX), 9(X), 13(X), 15(X); **R Inh** in 2(B), 3(B), 4(B), 8(B), 13(B); **SCGI** in 1(B), 2(B), 4(BE), 5(B), 6(B), 7(B), 8(BETX), 9(B), 10(B), 13(B), 14(B), 16(B), 17(B).

On 10-1-2014, four (5) monitoring wells {**MW-1 thru MW-5**} were installed to depths of 15 feet below ground surface (bgs) and three (3) soil borings {**SB-1 thru SB-3**} were advanced to

Page 2

depths of 10 feet bgs. Fourteen (14) soil samples were collected and analyzed for BETX/MTBE. Analytical results indicated COCs < Tier I SROs. Groundwater flow direction was to the west-southwest (SW).

On 12-11-2014, groundwater samples were collected from MW-1 thru MW-5 and analyzed for BETX/MTBE. Analytical results indicated COCs > Tier I GROs for **WCGI** in MW-3(B).

Site Investigation Plan/Budget Review Notes:

On 4-19-2016, one (1) soil boring {**SB-4**} were advanced to depths of 10 feet bgs and two (2) monitoring wells {**MW-6, MW-7**} were installed to depths of 15 feet bgs. One (1) additional soil boring {**TACO-1**} was advanced to depths of 10 feet bgs to determine site-specific TACO parameters. Seven (7) soil samples were collected and analyzed for BETX/MTBE; plus moisture content (ω), organic carbon content (f_{oc}), soil particle density (ρ_s), soil bulk density (ρ_b), and sieve analysis. Analytical results indicated COCs < Tier I SROs and ρ_b of 1.807 g/cm³, f_{oc} of 0.00450 g/g, ρ_s of 2.637 g/cm³, ω of 18%, and sieve analysis (9.6% sand, 7.1% clay, 83.3% silt) - Soil Classification: **Silt**.

On 4-19-2016, one (1) slug test was performed on monitoring well MW-1 indicated a hydraulic conductivity value (K) of 4.91×10^{-6} cm/sec using Bouwer & Rice Method.

On 4-20-2016, groundwater samples were collected from MW-6 and MW-7; then analyzed for BETX/MTBE. Analytical results indicated COCs > Tier I GROs for **WCGI** in MW-6(BE). Groundwater flow direction was to the southwest (SW).

According to ISWS, ISGS, and SWAP, ten (10) ISGS wells are located within 2,500 feet; the closest well is approximately 475 feet from the site. There is a groundwater ordinance for the entire city of Moline.

CWM proposed two (2) offsite monitoring wells be installed to depths of 15 feet bgs to further define the groundwater contamination; one (1) well on the western adjacent property and one (1) well across 5th Avenue. Groundwater samples will be collected and analyzed for BETX/MTBE.

Illinois EPA Recommendation/Comments:

The PM recommends that the S3 SIP, S2 AC, and S3 BUD be modified ... [see attachments]

Response Due:

1-25-2017

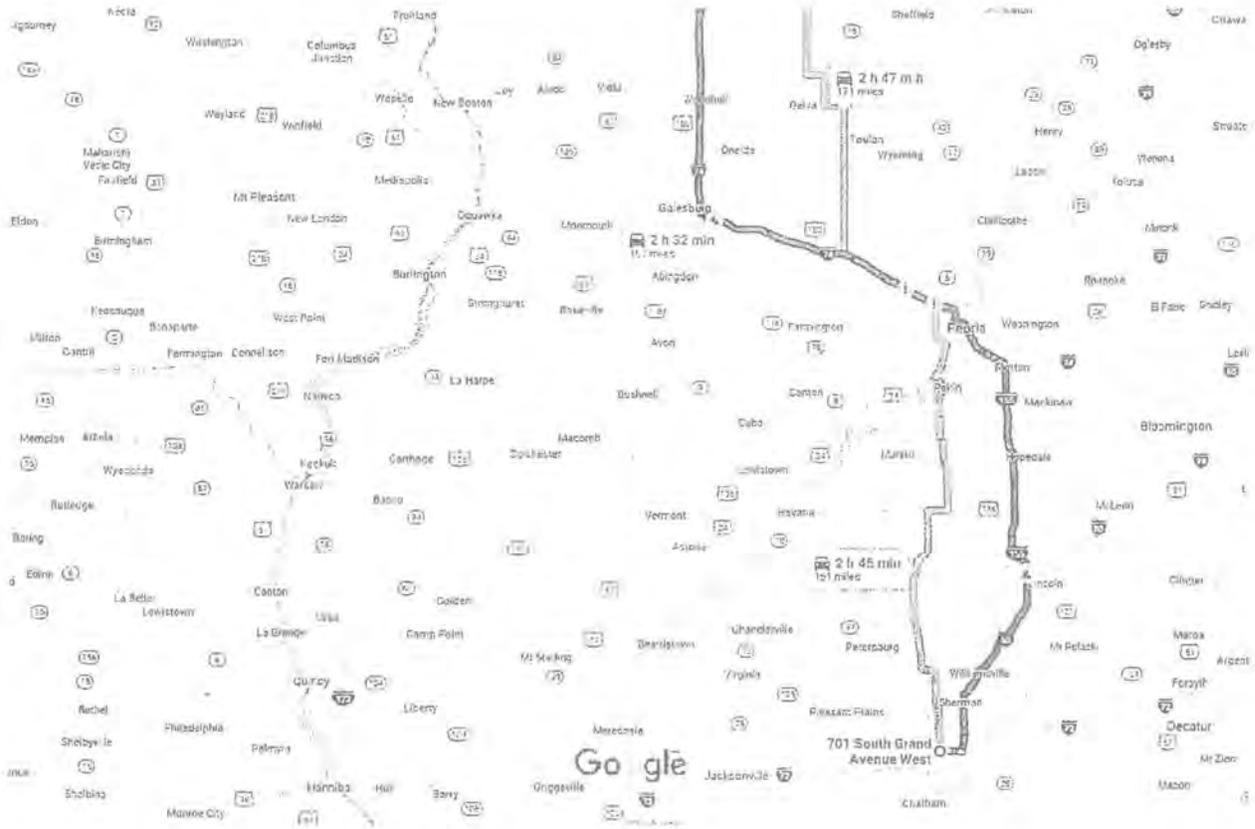
EK:P\

Google Maps

701 S Grand Ave W, Springfield, IL 62704 to 1830 5th Ave, Moline, IL 61265

Drive 167 miles, 2 h 32 min

Roundtrip from CWM Company in Springfield to Aman Food & Gas in Moline



Map data ©2017 Google 10 mi

701 S Grand Ave W

Springfield, IL 62704

Get on I-55 N/I-72 E

1. Head east on S Grand Ave W toward S Walnut St

10 min (3.7 mi)

2. Continue onto IL-29 E

3.0 mi

3. Use the right lane to take the ramp onto I-55 N/I-72 E

0.4 mi

0.2 mi

Electronic Filing: Received, Clerk's Office 4/5/2017

701 S Grand Ave W, Springfield, IL 62704 to 1830 5th Ave, Moline, IL 61265 - Google ... Page 2 of 3

Follow I-55 N, I-155 N and I-74 to 7th Ave in Moline. Take exit 2 from I-74/US-6 W

2 h 20 min (163 mi)

-  4. Merge onto I-55 N/I-72 E
 Continue to follow I-55 N 30.3 mi
-  5. Keep left at the fork to continue on I-155 N 32.0 mi
-  6. Use the left lane to take the Interstate 74 W exit toward Peoria 0.8 mi
-  7. Merge onto I-74 1.2 mi
-  8. Keep right to stay on I-74 85.5 mi
-  9. Take the exit onto I-280 W/I-74 toward Moline/Rock Island 9.5 mi
-  10. Take exit 5A for I-74 W/US-6 W toward Moline 0.4 mi
-  11. Merge onto I-74/US-6 W 3.0 mi
-  12. Take exit 2 for 7th Ave 0.3 mi
-  13. Use the right lane to keep left at the fork and continue toward 7th Ave 187 ft

Continue on 7th Ave. Take 19th St to 5th Ave

1 min (0.2 mi)

-  14. Use the right lane to turn left onto 7th Ave 318 ft
-  15. Slight right toward 19th St 236 ft
-  16. Turn right onto 19th St 0.1 mi
-  17. Turn left onto 5th Ave
 Destination will be on the left 79 ft

1830 5th Ave

Moline, IL 61265

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the

Electronic Filing: Received, Clerk's Office 4/5/2017

	Drilling	Analysis	Remediation	UST Removal	Demolition & Well Abandonment	Consulting Personnel	Materials	
S2AC	\$ 2,423.77	\$1,258.96	\$ -	\$ -	\$ -	\$ 18,330.40	\$ 1,022.50	\$23,035.63
DEDUCTIONS	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 945.55	\$ 312.10	\$ 1,257.65
SUBTOTALS	\$ 2,423.77	\$1,258.96	\$ -	\$ -	\$ -	\$ 17,384.85	\$ 710.40	\$21,777.98

\$ 21,777.98

\$ 388.77	\$ 6.60
\$ 155.68	\$ 75.00
\$ 303.80	\$ 7.50
\$ 97.30	\$ 22.50
\$ 945.55	\$ 120.00
	\$ 22.50
	\$ 15.00
	\$ 6.00
	\$ 1.00
	\$ 36.00
	\$ 312.10

Re: LPC #1610455194 – Rock Island County
Moline / Aman Food & Gas
1830 5th Avenue
Leaking UST Incident No. #20140247
Leaking UST Technical File

Page 2

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. This notification of field activities may be done by telephone, facsimile, or electronic mail—and must be provided at least two weeks prior to the scheduled field activities.

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 Stage 3 Site Investigation Plan, and budget if applicable, or 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 the Illinois EPA project manager, Eric Kuhlman, at 217-785-5715.

Page 3

Sincerely,



Stephen A. Colantino
Acting Unit Manager
Leaking Underground Storage Tank Section
Division of Remediation Management
Bureau of Land

SAC:EK:PV

Attachment: A, B, Appeal Rights

c: Matt Rives, CWM Company (electronic copy), matt@cwmcompany.com
BOL File

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:

John Therriault, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson 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

Attachment A

Re: LPC #1610455194 – Rock Island County
Moline / Aman Food & Gas
1830 5th Avenue
Leaking UST Incident No. #20140247
Leaking UST Technical File

Citations in this attachment are from the Environmental Protection Act (415 ILCS 5) (Act) and Title 35 of the Illinois Administrative Code (35 Ill. Adm. Code).

- I. The Stage 3 site investigation must be designed to identify the extent of off-site soil and groundwater contamination that, as a result of the release, exceeds the most stringent Tier 1 remediation objectives of 35 Ill. Adm. Code 742 for the applicable indicator contaminants. The Stage 3 site investigation must consist of the following:
 - a. The drilling of soil borings and collection of soil samples necessary to identify the extent of soil contamination beyond the site's property boundaries that exceeds the most stringent Tier 1 remediation objectives of 35 Ill. Adm. Code 742 for the applicable indicator contaminants. Soil samples must be collected in appropriate locations and at appropriate depths, based upon the results of the soil sampling and other investigation activities conducted to date, provided, however, that soil samples must not be collected below the groundwater table. All samples must be analyzed for the applicable indicator contaminants; and
 - b. The installation of groundwater monitoring wells and collection of groundwater samples necessary to identify the extent of groundwater contamination beyond the site's property boundaries that exceeds the most stringent Tier 1 remediation objectives of 35 Ill. Adm. Code 742 for the applicable indicator contaminants. If soil samples are collected from a monitoring well boring, the samples must be collected in appropriate locations and at appropriate depths, based upon the results of the soil sampling and other investigation activities conducted to date, provided, however, that soil samples must not be collected below the groundwater table. All samples must be analyzed for the applicable indicator contaminants.

(Section 57.1(a) of the Act and 35 Ill. Adm. Code 734.325)

The installation of one (1) additional groundwater monitoring well and collection of groundwater samples is necessary to identify the extent of groundwater contamination beyond the site's property boundaries. The location of this additional well should be across 5th Avenue and north of monitoring well MW-3.

Please note that the groundwater flow direction, determined by the Illinois EPA, is to the southwest (SW) for the October 2014 and April 2016 Groundwater Flow Direction Maps.

If the Illinois EPA is correct, then any groundwater in contact with contaminated soil near the former UST system would potentially migrate to the previously uninvestigated location southwest of the UST excavation and west of monitoring well MW-4. However, no additional groundwater investigation will be required at this time, unless there is evidence of groundwater contamination within MW-4.

EK:P\

Attachment B

Re: LPC #1610455194 – Rock Island County
Moline / Aman Food & Gas
1830 5th Avenue
Leaking UST Incident No. #20140247
Leaking UST Technical File

SECTION 1

STAGE 2 Actual Costs

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

\$2,423.77	Drilling and Monitoring Well Costs
\$1,258.96	Analytical Costs
\$0.00	Remediation and Disposal Costs
\$0.00	UST Removal and Abandonment Costs
\$0.00	Paving, Demolition, and Well Abandonment Costs
\$17,384.85	Consulting Personnel Costs
\$710.40	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.

STAGE 3 Proposed Budget

Costs must be incurred in accordance with the approved plan and must be determined in accordance with 35 Ill. Adm. Code 734.Subpart H, Appendix D, and Appendix E.

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.

SECTION 2

STAGE 2 Modifications

1. \$388.77 for costs for field preparation, scheduling, arrangements, and coordination by the Senior Project Manager that are inconsistent with the associated technical plan. One of the overall goals of the financial review is to assure that costs associated with materials,

activities, and services are consistent with the associated technical plan. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.510(b).

Costs associated with site investigation and corrective action activities and associated materials or services exceeding the minimum requirements necessary to comply with the Act are not eligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(o).

Therefore, the Senior Project Manager rate was reduced to the Senior Administrative Assistant rate of \$54.67 which was the approved personnel title and rate for this task in the Stage 2 Site investigation Plan Budget dated July 22, 2015. In addition, one hour was deducted since only 4 hours were approved for this task, not the 5 hours listed in the Stage 2 Actual Costs Budget.

Furthermore, in accordance with Section 734.870(d)(1), for costs approved by the Agency in writing prior to the date the costs are incurred, the applicable maximum payment amounts must be the amounts in effect on the date the Agency received the budget in which the costs were proposed. Once the Agency approved a cost, the applicable maximum payment amount for the cost must not be increased.

2. \$155.68 for costs for drilling, soil sampling, performing slug test, and field prep by the Engineer III that are inconsistent with the associated technical plan. One of the overall goals of the financial review is to assure that costs associated with materials, activities, and services are consistent with the associated technical plan. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.510(b).

Costs associated with site investigation and corrective action activities and associated materials or services exceeding the minimum requirements necessary to comply with the Act are not eligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(o).

Therefore, the Engineer III rate was reduced to the Professional Geologist of \$111.76 which was the approved personnel title and rate for this task in the Stage 2 Site Investigation Plan Budget dated July 22, 2015.

Furthermore, in accordance with Section 734.870(d)(1), for costs approved by the Agency in writing prior to the date the costs are incurred, the applicable maximum payment amounts must be the amounts in effect on the date the Agency received the budget in which the costs were proposed. Once the Agency approved a cost, the applicable maximum payment amount for the cost must not be increased.

3. \$303.80 for costs for groundwater sampling, surveying by Engineer III that are inconsistent with the associated technical plan. One of the overall goals of the financial review is to assure that costs associated with materials, activities, and services are

consistent with the associated technical plan. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.510(b).

Costs associated with site investigation and corrective action activities and associated materials or services exceeding the minimum requirements necessary to comply with the Act are not eligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(o).

Therefore, the Engineer III rate was reduced to the Engineer I rate of \$91.11 which was the approved personnel title and rate for this task in the Stage 2 Site Investigation Plan Budget dated July 22, 2015.

Furthermore, in accordance with Section 734.870(d)(1), for costs approved by the Agency in writing prior to the date the costs are incurred, the applicable maximum payment amounts must be the amounts in effect on the date the Agency received the budget in which the costs were proposed. Once the Agency approved a cost, the applicable maximum payment amount for the cost must not be increased.

4. \$97.30 for costs for groundwater sampling and surveying by Senior Project Manager that are inconsistent with the associated technical plan. One of the overall goals of the financial review is to assure that costs associated with materials, activities, and services are consistent with the associated technical plan. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.510(b).

Costs associated with site investigation and corrective action activities and associated materials or services exceeding the minimum requirements necessary to comply with the Act are not eligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(o).

Therefore, the Senior Project Manager rate was reduced to the Professional Geologist rate of \$111.76 which was the approved personnel title and rate for this task in the Stage 2 Site Investigation Plan Budget dated July 22, 2015.

Furthermore, in accordance with Section 734.870(d)(1), for costs approved by the Agency in writing prior to the date the costs are incurred, the applicable maximum payment amounts must be the amounts in effect on the date the Agency received the budget in which the costs were proposed. Once the Agency approved a cost, the applicable maximum payment amount for the cost must not be increased.

5. \$6.60 for costs for mileage, which exceed the minimum requirements necessary to comply with the Act. Costs associated with site investigation and corrective action activities and associated materials or services exceeding the minimum requirements necessary to comply with the Act are not eligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(o).

According to Google Maps, there is between 161-171 miles from the field office to the site depending on which route you take. The fastest route is approximately 167 miles which is about 334 miles roundtrip. Therefore, the Illinois EPA deducted the additional mileage that exceeded the minimum requirements necessary to comply with the Act since they are not eligible for payment from the Fund.

6. \$75.00 for site investigation or corrective action costs for 500 copies that are not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc).

To date, the consultant has not yet provided any receipt or invoice for costs associated with making 500 copies for the Stage 2 Plan. Please note the Illinois EPA only needs two copies of any plan, budget, or report submitted to the Illinois EPA for review.

7. \$7.50 for costs for 50 copies, which exceed the minimum requirements necessary to comply with the Act. Costs associated with site investigation and corrective action activities and associated materials or services exceeding the minimum requirements necessary to comply with the Act are not eligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(o).

Costs associated with making 50 copies exceed the minimum requirements necessary to comply with the Act are not eligible for payment from the Fund because only 150 copies were approved in the Stage 2 Site investigation Budget dated July 22, 2015, instead of the 200 copies submitted in the Stage 2 Actual Costs.

8. \$22.50 for site investigation or corrective action costs for 150 copies that are not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc).

To date, the consultant has not yet provided any receipt or invoice for costs associated with making 150 copies for the Stage 2 Budget. Please note the Illinois EPA only needs two copies of any plan, budget, or report submitted to the Illinois EPA for review.

9. \$120.00 for site investigation or corrective action costs for 800 copies that are not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc).

To date, the consultant has not yet provided any receipt or invoice for costs associated with making 800 copies for the Stage 2 Reimbursement Request. Please note the Illinois EPA only needs two copies of any claim submitted to the Illinois EPA for review.

10. \$22.50 for costs for 150 copies, which exceed the minimum requirements necessary to comply with the Act. Costs associated with site investigation and corrective action activities and associated materials or services exceeding the minimum requirements necessary to comply with the Act are not eligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(o).

Costs associated with making 150 copies exceeded the minimum requirements necessary to comply with the Act are not eligible for payment from the Fund since only 100 copies were approved in the Stage 2 Site investigation Budget dated July 22, 2015, instead of the 250 copies submitted in the Stage 2 Actual Costs.

11. \$15.00 for site investigation or corrective action costs for 100 copies that are not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc).

To date, the consultant has not yet provided any receipt or invoice for costs associated with making 100 copies for the field preparation, maps, boring logs, analytical reports, and field reports. In fact, any costs associated with making copies for field preparation,

maps, boring logs, analytical reports, and field reports should already be included within the Stage 2 Plan. Therefore, these costs are not eligible for payment from the Fund since they are duplicate costs.

12. \$6.00 for costs for disposable bailers, which exceed the minimum requirements necessary to comply with the Act. Costs associated with site investigation and corrective action activities and associated materials or services exceeding the minimum requirements necessary to comply with the Act are not eligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(o).

Costs associated with disposable bailers exceeded the minimum requirements necessary to comply with the Act. Therefore, the Illinois EPA reduced the disposable bailer rate to \$13.00 per bailer, which was the rate approved by the Illinois EPA in the Stage 2 Site Investigation Budget dated July 22, 2015.

13. \$1.00 for costs for bailing twine, which exceed the minimum requirements necessary to comply with the Act. Costs associated with site investigation and corrective action activities and associated materials or services exceeding the minimum requirements necessary to comply with the Act are not eligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(o).

Costs associated with disposable bailers exceeded the minimum requirements necessary to comply with the Act. Therefore, the Illinois EPA reduced the bailing twine rate to \$5.00 per roll, which was the rate approved by the Illinois EPA in the Stage 2 Site Investigation Budget dated July 22, 2015.

14. \$36.00 for site investigation or corrective action costs for materials used to perform slug test that are not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

To date, the consultant has not yet provided a list of the materials used to perform slug testing. Since there is no supporting documentation of these costs, the Illinois EPA cannot determine that costs will not be used for activities in excess of those necessary to meet the minimum requirements of the Act. Therefore, such costs are not approved.

STAGE 3 Modifications

1. \$148.00 for costs for PID, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

Pursuant to 35 Ill. Adm. Code 734.850(b) costs associated with activities that do not have a maximum payment amount set forth pursuant to 35 Ill. Adm. Code 734 Subpart H must be determined on a site specific basis and the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable. The Agency has requested additional documentation to support the rate requested for a PID pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination.

In addition, without supporting documentation for the rate requested the PID costs are not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

2. \$21.00 for costs for measuring wheel, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

Pursuant to 35 Ill. Adm. Code 734.850(b) costs associated with activities that do not have a maximum payment amount set forth pursuant to 35 Ill. Adm. Code 734 Subpart H must be determined on a site specific basis and the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable. The Agency has requested additional documentation to support the rate requested for measuring wheel pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination.

In addition, without supporting documentation the rate requested the measuring wheel is not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

3. \$7.80 for costs for mileage, which exceed the minimum requirements necessary to comply with the Act. Costs associated with site investigation and corrective action

activities and associated materials or services exceeding the minimum requirements necessary to comply with the Act are not eligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(o).

According to Google Maps, there is between 161-171 miles from the field office to the site depending on which route you take. The fastest route is approximately 167 miles which is about 334 miles roundtrip. Therefore, the Illinois EPA deducted the additional mileage that exceeded the minimum requirements necessary to comply with the Act since they are not eligible for payment from the Fund.

4. \$73.48 for costs for mileage, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

The Illinois EPA will reimburse for mileage at a rate of \$0.54 per mile when sufficient documentation was not submitted for a higher daily amount. Based on a roundtrip from CWM Company to the site being 334 miles per day for a total of 2 days proposed the allowable reimbursement is \$360.72. Based on this calculation, \$73.48 is being deducted from the consultant's material costs of the budget. A vehicle rental invoice showing the daily cost to rent the vehicle would be considered supporting documentation.

5. \$16.00 for costs for disposable gloves, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

Pursuant to 35 Ill. Adm. Code 734.850(b) costs associated with activities that do not have a maximum payment amount set forth pursuant to 35 Ill. Adm. Code 734 Subpart H must be determined on a site specific basis and the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable. The Agency has requested additional documentation to support the rate requested for disposable gloves pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination.

In addition, without supporting documentation the rate requested the disposable gloves is not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

6. \$56.00 for costs for water level indicator, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

Pursuant to 35 Ill. Adm. Code 734.850(b) costs associated with activities that do not have a maximum payment amount set forth pursuant to 35 Ill. Adm. Code 734 Subpart H must be determined on a site specific basis and the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable. The Agency has requested additional documentation to support the rate requested for water level indicator pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination.

In addition, without supporting documentation the rate requested the water level indicator is not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

7. \$90.00 for site investigation or corrective action costs for 600 copies that are not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc).

To date, the consultant has not yet provided any receipt or invoice for costs associated with making 600 copies for the Stage 3 Plan. Please note the Illinois EPA only needs two copies of any plan, budget, or report submitted to the Illinois EPA for review.

8. \$60.00 for site investigation or corrective action costs for 400 copies that are not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc).

To date, the consultant has not yet provided any receipt or invoice for costs associated with making 400 copies for the Stage 3 Budget. Please note the Illinois EPA only needs two copies of any plan, budget, or report submitted to the Illinois EPA for review.

9. \$90.00 for site investigation or corrective action costs for 600 copies that are not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc).

To date, the consultant has not yet provided any receipt or invoice for costs associated with making 600 copies for the Stage 3 Reimbursement Request. Please note the Illinois EPA only needs two copies of any claim submitted to the Illinois EPA for review.

10. \$22.50 for site investigation or corrective action costs for 150 copies that are not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc).

To date, the consultant has not yet provided any receipt or invoice for costs associated with making 150 copies for the field preparation, maps, boring logs, analytical reports, and field reports. In fact, any costs associated with making copies for field preparation, maps, boring logs, analytical reports, and field reports should already be included within the Stage 3 Plan. Therefore, these costs are not eligible for payment from the Fund since they are duplicate costs.

11. \$86.00 for costs for survey equipment, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

Pursuant to 35 Ill. Adm. Code 734.850(b) costs associated with activities that do not have a maximum payment amount set forth pursuant to 35 Ill. Adm. Code 734 Subpart H must be determined on a site specific basis and the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable. The Agency has requested additional documentation to support the rate requested for survey equipment pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination.

In addition, without supporting documentation the rate requested the survey equipment is not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

12. \$32.00 for costs for disposable bailers, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

Pursuant to 35 Ill. Adm. Code 734.850(b) costs associated with activities that do not have a maximum payment amount set forth pursuant to 35 Ill. Adm. Code 734 Subpart H must be determined on a site specific basis and the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable. The Agency has requested additional documentation to support the rate requested for disposable bailers pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination.

In addition, without supporting documentation the rate requested the disposable bailers is not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

13. \$6.00 for costs for bailing twine, which lack supporting documentation. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc). Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act.

Pursuant to 35 Ill. Adm. Code 734.850(b) costs associated with activities that do not have a maximum payment amount set forth pursuant to 35 Ill. Adm. Code 734 Subpart H must be determined on a site specific basis and the owner/operator must demonstrate to the Agency the amounts sought for reimbursement are reasonable. The Agency has requested additional documentation to support the rate requested for bailing twine pursuant to 35 Ill. Adm. Code 734.505(a). The documentation was either not provided or fails to provide sufficient information for the Agency to make a site specific reasonableness determination.

In addition, without supporting documentation the rate requested the bailing twine is not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

14. \$90.00 for site investigation or corrective action costs for 600 copies that are not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of Title XVI of the Act. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc).

To date, the consultant has not yet provided any receipt or invoice for costs associated with making 600 copies for the SICR. Please note the Illinois EPA only needs two copies of any plan, budget, or report submitted to the Illinois EPA for review.

15. \$90.00 for site investigation or corrective action costs for 250 copies that are not reasonable as submitted. Such costs are ineligible for payment from the Fund pursuant to Section 57.7(c)(3) of the Act and 35 Ill. Adm. Code 734.630(dd).

Since there is no supporting documentation of costs, 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. Therefore, such costs are not approved pursuant to Section 57.7(c)(3) of the Act because they may be used for site investigation or corrective

action activities in excess of those required to meet the minimum requirements of Title XVI of the Act. Such costs are ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code 734.630(cc).

To date, the consultant has not yet provided any receipt or invoice for costs associated with making 600 copies for the SICR. Please note the Illinois EPA only needs two copies of any correspondence submitted to the Illinois EPA for review. In fact, the consultant has not provided any explanation why 250 copies are needed to notify only two offsite property owners.

EK:PV

CERTIFICATE OF SERVICE

I, the undersigned, on affirmation state the following:

That I have served the attached **CERTIFICATE OF RECORD ON APPEAL and the accompanying documents comprising the entire record of the Respondent's decision** by e-mail upon Patrick D. Shaw at the e-mail address of pdshaw1law@gmail.com and upon Hearing Officer Carol Webb at the e-mail address of Carol.Webb@Illinois.gov.

That my e-mail address is Scott.Sievers@Illinois.gov.

That the number of pages in the e-mail transmission is four hundred and seventy-two (472).

That the e-mail transmission took place before 5:00 p.m. on the date of April 5, 2017.

/s/Scott B. Sievers
April 5, 2017