

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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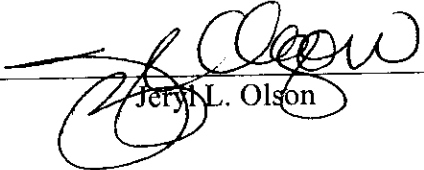
STATE OF ILLINOIS
Pollution Control Board

WEBEL FEEDS and TLHUS, INC.)
 as Successor-in-Interest,)
)
 Petitioner,)
)
 v.)
)
 ILLINOIS ENVIRONMENTAL PROTECTION)
 AGENCY,)
)
 Respondent.)

08-34
 PCB 07-XXX
 (UST Appeal)

NOTICE OF FILING

PLEASE TAKE NOTICE that I have filed with the Office of the Clerk of the Pollution Control Board the APPEARANCE of Jeryl L. Olson and APPEAL OF UNDERGROUND STORAGE TANK DECISION, copies of which are herewith served upon you.



Jeryl L. Olson

Jeryl L. Olson
 Seyfarth Shaw LLP
 131 N. Dearborn Street, Suite 2400
 Chicago, Illinois 60603
 (312) 460-5000

Dated: November 15, 2007

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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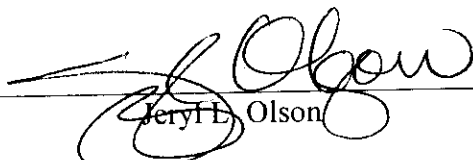
STATE OF ILLINOIS
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WEBEL FEEDS and TLHUS, INC.)
as Successor-in-Interest,)
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Petitioner,)
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v.)
)
ILLINOIS ENVIRONMENTAL PROTECTION)
AGENCY,)
)
Respondent.)

08-34
PCB ~~07-XXX~~
(UST Appeal)

APPEARANCE

I hereby file my APPEARANCE in this proceeding, on behalf of Pittsfield/Webel Feeds.



Jeryl L. Olson

Jeryl L. Olson
Seyfarth Shaw LLP
131 N. Dearborn Street, Suite 2400
Chicago, Illinois 60603
(312) 460-5000

Dated: November 15, 2007

(THIS DOCUMENT IS SUBMITTED ON RECYCLED PAPER)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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STATE OF ILLINOIS
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WEBEL FEEDS and TLHUS, INC.)
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 AGENCY,)
)
 Respondent.)

08-34
 PCB 07-XXX
 (UST Appeal)

APPEAL OF UNDERGROUND STORAGE TANK DECISION

Pursuant to the requirements of 35 IL Adm. Code Part 105 Subpart D, Webel Feeds, and its successor-in-interest, TLHUS, INC., (hereinafter "Company," or "Petitioner") through their counsel, Seyfarth Shaw LLP, hereby appeal the October 4, 2007 final decision of the Illinois Environmental Protection Agency ("Agency") rejecting the Company's Amended Corrective Action Plan dated September 12, 2007, ("Amended CAP") for LUST Incident No. 921798. The final decision of the Agency appears in Exhibit A. Pursuant to 35 Il. Adm. Code § 105.402, the Company is entitled to file a Petition for review of the Agency's determination concerning the Corrective Action Plan for the high priority site. The final decision was received by the Petitioner on October 11, 2007, and the deadline for this appeal is November 15, 2007.

The grounds for this appeal are the Agency's arbitrary and capricious actions in rejecting the Amended CAP including:

1. The Agency's rejection of Petitioner's alternative remedy as set forth in the Amended CAP;

2. The Agency's requirement that the groundwater recovery and remediation system currently operated by the Company be shut down;

3. The Agency's error in identifying downgradient off-site groundwater as Class II groundwater, contrary to the 35 IL. Adm. Code Part 620 classification regulations, which if properly applied, would cause the water to be classified as Class I groundwater;

4. The Agency's determination that a No Further Remediation Letter ("NFR") can be issued without further remediation to meet offsite groundwater cleanup objectives or without elimination of the offsite groundwater pathway using an institutional control.

In support of this appeal, Petitioner states as follows.

a. Webel Feeds, Inc. produced and stored animal feeds at its Pittsfield facility, located along Rural Route No. 3 in Pike County, Illinois. (Webel Feeds has changed ownership several times; first to PM Ag Products, then to the Company, and then to The Maschhoffs.) TLHUS is taking responsibility for the LUST Incident and resolution thereof. The facility at which the incident occurred is approximately 3-miles north of Pittsfield, Illinois and 1.5-miles south of U.S. Route 36. The facility is bordered in all directions by farmland, with an unnamed creek.

In 1994, a remediation system was first approved by Illinois EPA to treat soil and groundwater contamination resulting from a release of leaded and unleaded gasoline and diesel fuel from five (5) underground storage tanks (USTs) (Incident Number 921798). From December 1994 to October 2003, Corrective Actions were performed under the regulations of 35 IL. Adm. Code § 731, and detailed in CAP Addendums and Groundwater Monitoring and Remediation Progress Reports. In 2003, the Agency approved addressing the remediation under the then-newly approved 35 IL. Adm. Code § 734 regulations.

Over the years Petitioner has undertaken substantial remediation of the LUST incident; the response has included expenditures in excess of \$1 million to treat contaminated soils by soils vapor extraction (“SVE”), to treat saturated soils and groundwater by chemical injection, and to install and operate a groundwater “pump and treat” remediation system.¹ Groundwater is monitored to demonstrate the remediation system operates successfully to maintain off-site groundwater below Tier 1 standards for Class I groundwater (the most stringent groundwater standards applicable to the agricultural land down gradient). Despite the Company’s efforts, under current conditions, without further remediation of soils, it is estimated the groundwater remediation system would need to be operated for 3 to 10 more years at a cost of \$50,000 - \$75,000 per year to maintain offsite groundwater below the Class I Tier 1 standards.

In May 2003, expressing concern that the groundwater treatment system was operating too slowly and with minimal effect, the Agency suggested Petitioner take an alternative approach to remediation. Since that time, Petitioner has submitted various CAP amendments or addendums, including the Amendment that is the subject of this Appeal. (Exhibit B contains relevant portions of the CAP Amendment, without Appendices).

As an alternative to long-term groundwater treatment and monitoring, in the Amended CAP Petitioner proposed excavation and removal of the soils contributing to the groundwater contamination, at a cost of approximately \$110,000. That remediation, combined with several months continued operation of the groundwater treatment system, would restore the groundwater to cleanup objectives within months (as opposed to the 3-10 years estimated cleanup under the

¹ The SVE system has been discontinued since 2001, however, the groundwater pump and treat remediation system continues in operation.

existing system), in a more cost effective manner than the existing long-term groundwater remediation by “pump and treat.”

Despite the demonstration by Petitioner that the remediation proposed in the Amendment is better for the environment and is more cost effective than the current groundwater remediation system, in the final Agency action at issue the Agency rejected the proposal for soils excavation and removal. On its face, such action by the State is arbitrary and capricious, however, the Agency’s actions go much further than being arbitrary and capricious. Not only has the Agency rejected the technically feasible and economically reasonable amended remediation plan, it has further advised Petitioner “The groundwater recovery and remediation system at this site needs to be shut down.” This requirement is environmentally and legally unreasonable. Modeling and monitoring have show that cessation of operation of the current groundwater remediation system, without further remediation of soils, would cause the contamination levels in off-site groundwater to increase above the Class I, Tier 1 cleanup objectives, posing a risk to human health and the environment. If Petitioner complies with the Agency directive, Petitioner becomes potentially subject to common law, statutory and regulatory liability to the state, the federal government and private parties, for the exceedences which would occur by shutting down the groundwater treatment system.

Because Petitioner has proposed a technically feasible, economically reasonable and environmentally preferable alternative to the current remediation system, the Agency’s denial of the Amended CAP is arbitrary and capricious; furthermore, the Agency’s direction to Petitioner to “shut down” the groundwater treatment system, will likely result in risks to human health and the environment, and will subject Petitioner to liability.

b. Despite several attempts by Petitioner to correct the Agency's error, the Agency has improperly characterized off-site groundwater as Class II groundwater; it is the Petitioner's position that the off-site groundwater is Class I groundwater. As measured by Petitioner, the hydraulic conductivity of groundwater in MW-16 (which is an off-site monitoring well) is 4.26×10^{-4} cm/s; by definition, groundwater is considered Class I groundwater if the hydraulic conductivity is greater than 1.10^{-4} cm/s. Therefore the off-site groundwater is Class I groundwater.

This mistake in groundwater classification by the Agency has significant ramifications both in terms of the environment, and for the liability of the Petitioner. An improper Class 2 characterization by the Agency will result in a higher groundwater cleanup objectives for the off-site groundwater, allowing higher levels of contaminants to be present than should be allowed in this potable water source. The State's mischaracterization puts the state's most protected class of groundwater at risk, and does not protect the adjacent agricultural property owner, as there are no institutional controls present for the adjacent site which prohibit the use of the groundwater as potable drinking water.

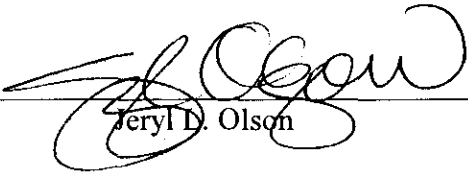
Further at issue is legal risk to Petitioner; if Petitioner follows the Agency's directive to cease the operation of the groundwater remediation system, the contaminant levels are modeled to exceed the Class I cleanup objectives. If the State (or a third party) recognizes later that the Agency made a mistake in the classification, Petitioner would potentially have liability for allowing the contamination in excess of the standards, even though the cessation of operation of the system was at the direction of the Agency.

c. In the absence of the additional soils remediation proposed by Petitioner in the Amended CAP, groundwater contaminant concentrations will not naturally attenuate to the Class

I groundwater Tier 1 cleanup objectives before reaching the adjacent property. According to State regulations, in order to be eligible for an NFR, it is necessary for the site to either remediate the off-site groundwater to meet applicable standards, or, as an alternative, to ensure an institutional control (or environmental land use control) is in place to limit off-site use of the groundwater, and thus eliminate the groundwater pathway. Because in the absence of the Petitioner's proposed soils remediation, the groundwater will not meet cleanup objectives for several years, and because of the absence of institutional controls on adjacent property to limit the exposure pathway, the State cannot at anytime in the next few years issue a No Further Remediation Letter ("NFR") to Petitioner. The Agency is aware there are currently no institutional controls in place limiting use of off-site groundwater on the adjacent property, and that the off-site groundwater does not meet cleanup objectives without operation of the groundwater treatment system. If the groundwater remediation system is "shut down" as required by the Agency, the groundwater contaminant levels will exceed applicable standards, and because there are no institutional controls in place to eliminate the groundwater pathway, contrary to the Agency's assertion in the final agency determination that ". . . the No Further Remediation Letter can be issued for the incident after providing documentation that the on-site well has been properly abandoned. . .", state law will not allow issuance of the NFR at any time in the foreseeable future. Therefore the Agency's rejection of the Petitioner's Amended CAP, and the Agency's proffered directive to shut down the existing remediation system is arbitrary and capricious, is not in conformance with state law, and poses a risk to the environment.

Petitioner's Amendment to the Corrective Action Plan proposes effective remediation to the levels necessary to form the basis of issuance a NFR in a much shorter time than the current remedy. Remediation is necessary because establishment and reliance on an institutional control

is not an option to address offsite groundwater contamination on the adjacent property. For the reasons set forth above, Petitioner respectfully requests a public hearing of this matter, and a determination by the Board that the Amended Corrective Action Plan be approved.



Jeryl D. Olson

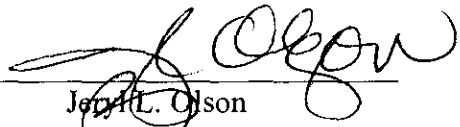
Jeryl L. Olson
Seyfarth Shaw LLP
131 N. Dearborn Street, Suite 2400
Chicago, Illinois 60603
(312) 460-5000

Dated: November 15, 2007

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached APPEARANCE, NOTICE OF FILING and APPEAL OF UNDERGROUND STORAGE TANK DECISION on November 15, 2007 by U.S. Mail, upon:

Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276



Jerry L. Olson



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

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

217/782-6762

OCT 04 2007

CERTIFIED MAIL

7007 0220 0000 0152 9917

PM Ag Products, Inc.
Attention: Don Moster
2200 East Eldorado Street
Decatur, Illinois 62525

Re: LPC #1490755017 -- Pike County
Pittsfield / Webel Feeds
Rural Route 3
Leaking UST Incident No. 921798
Leaking UST Technical File

Dear Mr. Moster:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the Amended Corrective Action Plan (plan) submitted for the above-referenced incident. This plan, dated September 12, 2007, was received by the Illinois EPA on September 17, 2007. Citations in this letter are from the Environmental Protection Act (Act), as amended by Public Act 92-0554 on June 24, 2002, and 35 Illinois Administrative Code (35 Ill. Adm. Code).

The plan is rejected for the reason(s) listed below (Sections 57.7(b)(2) and 57.7(c) of the Act and 35 Ill. Adm. Code 734.505(b) and 734.510(a)):

The proposed activities are excessive since it appears that the applicable objectives can be met without completing additional excavation. Information has already been submitted for this site that shows Tier 2 objectives can be met without completing the proposed soil excavation or obtaining an institutional control with the adjacent property owners. Modeling has demonstrated that Class I groundwater objectives are met before reaching off-site monitoring wells near the neighboring creek. The clayey/silty sand layers encountered in MW-16, 17, and 18 do not meet the Class I groundwater definition since the hydraulic conductivity reported from the area was less than 1×10^{-4} cm/s.

The groundwater recovery and remediation system at this site needs to be shut down and the approach provided in Attachment A of the Illinois EPA review letter dated July 24, 2007 needs to be followed. The No Further Remediation Letter can be issued for this incident after providing documentation that the on-site potable water supply well has been properly abandoned and post-remediation groundwater sampling completed.

ROCKFORD - 4302 North Main Street, Rockford, IL 61103 - (815) 987-7760 • DES PLAINES - 9511 W. Harrison St., Des Plaines, IL 60016 - (847) 294-4000
ELGIN - 595 South State, Elgin, IL 60123 - (847) 608-3131 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463
BUREAU OF LAND - PEORIA - 7620 N. University St., Peoria, IL 61614 - (309) 693-5462 • CHAMPAIGN - 2125 South First Street, Champaign, IL 61820 - (217) 278-5800
SPRINGFIELD - 4500 S. Sixth Street Rd., Springfield, IL 62706 - (217) 786-6892 • COLLINSVILLE - 2009 Mall Street, Collinsville, IL 62234 - (618) 346-5120
MARION - 2309 W. Main St., Suite 116, Marion, IL 62959 - (618) 993-7200

Page 2

Pursuant to Sections 57.7(b) and 57.12(c) and (d) of the Act and 35 Ill. Adm. Code 734.100 and 734.125, a plan and/or budget must be submitted within 90 days of the date of this letter to:

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

Please 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 Melinda Friedel, P.E. at 217/785-5736.

Sincerely,



Michael T. Lowder
Unit Manager
Leaking Underground Storage Tank Section
Division of Remediation Management
Bureau of Land

Attachment: Appeal Rights

c: Christopher Cailles / DAI Environmental, Inc.
BOL File

November 5, 2007

Ms. Melinda Friedel
Illinois Environmental Protection Agency
Bureau of Land
LUST Section
1021 North Grand Avenue East
P.O. Box #9276
Springfield, IL 62794-9276

**Re: LPC # 1490755017 – Pike County
 Pittsfield/Webel Feeds
 Rural Route # 3
 Pittsfield, IL 62363
 Incident #: 921798
 LUST Technical File**

Ms. Friedel,

This letter is written in response to the Illinois EPA letter dated October 4, 2007. The Illinois EPA letter rejected the September 12, 2007, dated *Corrective Action Plan Amendment* (CAP Amendment) written by DAI Environmental, Inc., (DAI) for Webel Feeds (Site), Incident Number 921798.

The CAP Amendment proposed a modification to the Illinois EPA suggested approach to Site Closure that was detailed in Attachment A of a letter dated July 24, 2007. DAI indicated that TACO modeling cannot be used to achieve Site Closure without further remediation and presented soil excavation and disposal as the most expedient and certain method to complete the remediation. With removal of most highly contaminated soils, then TACO modeling could be used to achieve final Site Closure. The Illinois EPA October 4, 2007, letter rejected DAI's modification and stated the following:

The proposed activities are excessive since it appear that the applicable objectives can be met without completing additional excavation. Information has already been submitted for this site that shows Tier 2 objectives can be met without completing the proposed soil

Ms. Melinda Friedel
November 5, 2007

excavation or obtaining an institutional control with the adjacent property owners. Modeling has demonstrated that Class I groundwater objectives are met before reaching off-site monitoring wells near the neighboring creek. The clayey/silty sand layers encountered in MW-16, 17, and 18 do not meet the Class I groundwater definition since the hydraulic conductivity reported from the area was less than 1×10^{-4} cm/s.

The groundwater recovery and remediation system at this site needs to be shut down and the approach provided in Attachment A of the Illinois EPA review letter dated July 24, 2007 needs to be followed. The No Further Remediation Letter can be issued for this incident after providing documentation that the on-site potable water supply well has been properly abandoned and post-remediation groundwater sampling completed.

In response to the above comment, Tate & Lyle would like to point out discrepancies in the information used by Illinois EPA. Illinois EPA is correct that fate and transport modeling has been provided indicating that on-site groundwater contamination will attenuate to Tier 1 Class I Groundwater Remediation Objectives (GROs) before reaching off-site monitoring wells (MW-16 to MW-18) near the neighboring creek. However, although current groundwater concentrations on-site will attenuate before reaching the off-site monitoring wells that are located 62.75-feet downgradient, modeling indicates that concentrations will not attenuate to Tier 1 Class I GROs before extending onto the neighboring property that is located only 25.5-feet downgradient. The table included in the September 2007 CAP Amendment clearly demonstrated these results. Therefore it is incorrect to state that Tier 2 GROs can be met without obtaining an environmental land use control (ELUC) from the neighboring property owner, and Illinois EPA has been clearly informed that an ELUC is not an option.

Further, although a Class II groundwater designation will apply on-site following the formal abandonment of the on-site potable water well, Illinois EPA is incorrect in stating that the downgradient groundwater does not meet the Class I groundwater definition because the hydraulic conductivity reported from the area was less than 1×10^{-4} cm/s. The August 30, 2006, report provided data analysis showing a hydraulic conductivity at off-site monitoring well MW-16 of 4.26×10^{-4} -cm/s, greater than the Class I criteria of 1×10^{-4} -cm/s and an observed clayey sand layer of over 5-feet in thickness. Therefore, Tier 1 Class I GROs do apply to the downgradient property, unless Illinois EPA can arbitrarily ignore 35 IAC 620 regulations and designate the downgradient groundwater as Class II.

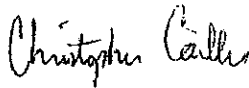
Ms. Melinda Friedel
November 5, 2007

Because current groundwater contaminant concentrations will not attenuate to the Tier 1 Class I GROs before reaching the downgradient property, then an ELUC must be obtained from the neighboring property owner. Again, it has been clearly stated that an ELUC is not an option. For this reason, soil excavation (or other physical remedial option) to eliminate the source of groundwater contamination on-site is necessary.

Tate & Lyle and Illinois EPA both desire an expeditious cleanup of this property. However, Tate & Lyle is extremely concerned that if it follows Illinois EPA's approach by shutting down the groundwater recovery and remediation system, that in all likelihood the downgradient property may be unnecessarily contaminated and potentially expose Tate & Lyle to liability. Tate & Lyle would like further assurances and/or clarification regarding Illinois EPA's approach. As a consequence, Tate & Lyle and DAI request a meeting with Illinois EPA representatives to discuss this matter further.

Pending the outcome of this meeting with Illinois EPA, Tate & Lyle has requested a 90-day extension of the Illinois EPA letter dated October 4, 2007, that rejected the September 12, 2007, CAP Amendment submitted by DAI in order to preserve its Appeal Rights in this matter.

Sincerely,
DAI Environmental, Inc.



Christopher Cailles, P.E.
Project Engineer

cc: Don Moster -- Tate & Lyle



Environmental Engineers, Geologists and Scientists

Tel 847.573.8900
Fax 847.573.8953

Polo Park Business Center
27834 N. Irma Lee Circle
Lake Forest, Illinois 60045-5130

April 2, 2007

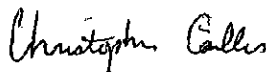
Ms. Melinda Friedel
Illinois Environmental Protection Agency
Bureau of Land - #24
Leaking Underground Storage Tank Section
1021 N. Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

Re:*Corrective Action Plan Amendment/
 Corrective Action Budget Amendment
 LPC #1490755017 – Pike County
 Pittsfield/Webel Feeds, Inc.
 Rural Route 3
 Pittsfield, Illinois
 LUST Incident #921798*

Dear Ms. Friedel:

I have enclosed two copies (one bound, one unbound) of the *Corrective Action Plan (CAP) Amendment* for Webel Feeds, Incident Number 921798. The CAP Amendment responds to Illinois EPA's most recent letter dated November 3, 2006, and proposes Corrective Actions that address all remaining environmental issues. The Corrective Actions proposed in this CAP Amendment are adequate to obtain a letter of No Further Remediation granting closure of the Site. Also included with this CAP Amendment is a Corrective Action Budget Amendment requesting \$319,727.48 for the costs of historical and proposed Corrective Actions through the anticipated end of the project. If you have any questions or require additional information, please contact me at (847) 573-8900 extension 118. Thank you for your time.

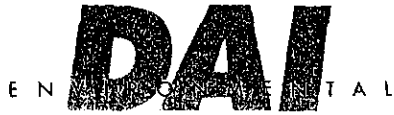
Sincerely,
DAI Environmental, Inc.


Christopher Cailles, P.E.
Project Engineer

Enclosures

cc: Don Moster -- Tate & Lyle (w/enclosure)

EXHIBIT B



Environmental Engineers, Geologists and Scientists

Tel 847.573.8900
Fax 847.573.8953

Polo Park Business Center
27834 N. Irma Lee Circle
Lake Forest, Illinois 60045-5130

**CORRECTIVE ACTION PLAN AMENDMENT
PITTSFIELD/WEBEL FEEDS, INC.
RURAL ROUTE # 3
PITTSFIELD, ILLINOIS
LPC # 1490755017 - PIKE COUNTY
INCIDENT # 921798**

March 19, 2007

DAI Project No. 6601

**Prepared For:
Tate & Lyle
2200 East Eldorado Street
Decatur, Illinois 62521-1578**

**Prepared By:
DAI Environmental, Inc.
Polo Park Business Center
27834 Irma Lee Circle
Lake Forest, Illinois 60045**

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1.0 INTRODUCTION

1.1 SITE DESCRIPTION

Webel Feeds, Inc. (Webel Feeds) produced and stored animal feeds at its Pittsfield facility, located along Rural Route No. 3 in Pike County, Illinois. (Webel Feeds has changed ownership to PM Ag Products, then Tate & Lyle, and then The Maschhoffs.) This facility is approximately 3-miles north of Pittsfield, Illinois and 1.5-miles south of U.S. Route 36. The facility is bordered on the north by Rural Route No. 3, then farmland; on the east by an unnamed creek, then farmland; and on the south and west by farmland. Figure 1 provides a Topographic Site Location Map, and Figure 2 provides a Site Plan.

1.2 REGULATORY HISTORY

In a letter dated April 11, 1994, a remediation system was approved by Illinois EPA to treat soil and groundwater contamination resulting from a release of leaded and unleaded gasoline and diesel fuel from five (5) underground storage tanks (USTs) (Incident Number 921798). From December 1994 to October 2003, Corrective Actions were performed under the regulations of 35 IAC 731, and detailed in CAP Addendums and Groundwater Monitoring and Remediation Progress Reports. However, in a letter dated May 27, 2003, Illinois EPA responded to a Corrective Action Plan (CAP) Addendum with four (4) comments. Comments 1 and 3 of the letter stated:

1. It appears that the current method of groundwater treatment is not affecting the existing levels of BTEX and PNAs in the groundwater. Since this system has been in operation for eight years with little effect in reducing the remaining contaminant concentrations, the Illinois EPA recommends you consider an alternative approach to address the remaining contamination.

3. The Illinois EPA suggests that options available under 35 Illinois Administrative Code 742, Tiered Approach to corrective Action Objectives (TACO) be utilized. The development of risk-based cleanup objectives may be appropriate after contaminant levels are shown to be stable and/or decreasing to demonstrate adequate protection of human health and the environment for this incident.

Following the May 2003 letter, Tate & Lyle elected to proceed with Corrective Actions under the newly approved 35 IAC 734 regulations. Since that time, several CAP Addendums have been

submitted in response to the May 2003 letter. The CAP Addendums and Illinois EPA responses are summarized below.

October 21, 2003, CAP Addendum: This letter report was submitted in response to a meeting held on October 8, 2003, at the offices of Illinois EPA. A proposal for installation of four (4) additional shallow groundwater monitoring wells was submitted along with the form *Election To Proceed Under Title XVI*.

February 19, 2004, Response Letter from Illinois EPA: Illinois EPA's response letter approved the monitoring well installation with modifications. The modifications indicated that groundwater samples should be collected no sooner than two (2) weeks after well installation and analyzed for BTEX only. Further, Illinois EPA requesting two (2) weeks notification prior to monitoring well installation.

December 20, 2004, CAP Addendum: The newly collected groundwater sampling results together with TACO regulations and procedures were used to calculate Tier 2 Groundwater Remediation Objectives (GROs) for the Site. Because the on-site groundwater contaminant concentrations exceeded the Tier 2 GROs, additional remediation was proposed. As had been explained in several previous submissions, the primary source of groundwater contamination is the continued desorption of gasoline contamination from the highly contaminated saturated soils on the side of the hill. The groundwater remediation would continue to be a very slow process until the contaminant mass in the saturated soils were also addressed. The CAP proposed several remedial alternatives to address the soils in the source area including soil excavation and disposal, ORC[®] injection, chemical injection, and air sparging (and combination soil excavation and air sparging).

February 9, 2005, Response Letter from Illinois EPA: Illinois EPA's response letter indicated receiving the December 2004 submission, but the letter was apparently only addressing a separate submission that included information about an Oxygen releasing product called StimulOX[™]. The response letter requested additional data on the product before the use of the product could be

approved; however, no comments were provided on the several proposed Corrective Actions detailed in the December 2004 report.

March 23, 2005, CAP Addendum: In following up on a telephone conference call with Illinois EPA the following Corrective Action steps were proposed: shut down the remediation system for a period of time sufficient to measure static water levels, hydraulic conductivity, and groundwater concentrations under steady-state non-groundwater recovery conditions. The groundwater concentrations were then to be compared with site specific Tier 2 GROs. Depending upon these results, either Site Closure would be requested, or the system would be restarted, and a combination soil excavation and air sparge system would be proposed in a CAP Addendum. The CAP Addendum would include sampling saturated soils within the groundwater plume to better determine where the residual contaminant mass was located, and the optimal location for the sparge system trench.

May 31, 2005, Response Letter from Illinois EPA: The CAP was conditionally approved but required two (2) modifications. The first modification was that the monitoring wells chosen for hydraulic conductivity testing should be selected to represent the entire Site, as opposed to being representative of the groundwater contaminant plume and area immediately downgradient where the contaminant migration is occurring. The second modification was to reject the saturated soil sampling which was needed to identify the areas of highest contaminant mass and pinpoint the best soil removal and air sparge trench locations.

March 27, 2006, CAP Addendum: The results of the groundwater sampling and hydraulic conductivity testing under non-groundwater recovery conditions were provided in this submission. The results of the groundwater sampling still indicated exceedances of the newly calculated Tier 2 GROs (which were based upon the most recent data). For that reason, the groundwater remediation system was restarted in December 2005 and operated continuously. It was also noted in the submission that less restrictive (higher concentration) Tier 2 GROs could be calculated if the existing on-site potable well were removed, and the current property owner agreed to a deed restriction on the property prohibiting groundwater use. The additional saturated soil samples that were requested in the March 2005 CAP Addendum and disapproved by Illinois EPA in the May 31, 2005, response

were not collected; but based upon earlier saturated soil samples and the latest Tier 2 GRO calculations, it was estimated that if the most contaminated soils in an area of approximately 90-ft by 70-ft could be removed, then the Tier 2 GROs could be achieved in a much shorter time. Removal of the contaminant soil mass, together with the on-site groundwater use prohibition, would eliminate the need for air sparging, shorten the remediation period, and reduce the overall remediation costs.

May 8, 2006, Response Letter from Illinois EPA: Illinois EPA responded with four (4) comments: confirmation sampling should include analysis for Lead as a contaminant of concern; the option for an on-site groundwater use restriction on the Property Owner Summary form is essentially the same as an ELUC; it may be possible to meet Tier 2 GROs with a Class II groundwater designation (on the downgradient off-site property); and that a proposal has not been submitted to use hydraulic conductivity averaging (the earlier CAP used Site-wide averaged hydraulic conductivities as were understood to have been requested by Illinois EPA in the May 31, 2005, response letter).

August 30, 2006, Response to Comments/CAP Amendment: DAI responded to Illinois EPA's May 8, 2006, comments by requesting that Lead sampling not be required because historical groundwater sampling for Lead had been previously conducted, and laboratory analysis indicated no Lead contamination (documentation was supplied). The CAP Addendum also recognized that signatures by the property owner agreeing to an on-site groundwater use restriction on the Property Owner Summary form is equivalent to an ELUC, and explained that a proposal for hydraulic conductivity averaging was not submitted because a Site-wide average hydraulic conductivity value was used in response to Illinois EPA May 31, 2005, comment that, "The monitoring wells chosen for hydraulic conductivity testing should be representative of the entire site...Hydraulic conductivity testing should be performed on wells across the site."

The most significant comment and response from Illinois EPA were with regard to using Class II groundwater criteria in calculating Tier 2 GROs. Using Class II criteria can provide a higher (less restrictive) GRO, but an on-site Class II demonstration would be meaningless if the on-site groundwater route of exposure were already eliminated. A Class II demonstration for the off-site downgradient property would produce less restrictive Tier 2 GROs, but the hydraulic conditions on

the off-site property do not meet the 35 IAC 620.220 criteria for Class II groundwater (even after the on-site potable well is closed). If Illinois EPA can designate the off-site property as Class II, then less restrictive Tier 2 GROs can be calculated, and further remediation may not be necessary.

November 3, 2006 – Response Letter from Illinois EPA: Illinois EPA denied the CAP Amendment and provided six (6) comments to address. The responses to the comments are provided in the following section of this CAP Amendment. The proposed final course of Corrective Actions to obtain Site closure are detailed in Section 3.0.

2.0 RESPONSE TO COMMENTS

- 1. A proposal that addresses all outstanding issues at this site has not been provided. An Amended Corrective Action Plan (plan) cannot be approved unless it will address all remaining concerns for the subject site. Please note that if additional soil excavation is being proposed, a formal CAP meeting all necessary regulatory requirements must be submitted.*

Response: Both soil and groundwater contamination remains at the Site. Proposals have been submitted to Illinois EPA since 2003 with Corrective Actions to address all remaining concerns. Remediation methods included soil excavation, air sparging, chemical injection, and continued groundwater remediation. Alternatives to reduce the level of cleanup as provided under TACO regulations include calculation of the highest (least restrictive) Tier 2 GROs and on-site groundwater use prohibition to eliminate the on-site groundwater ingestion route of exposure. Illinois EPA has only responded by commenting that continued groundwater remediation is not reimbursable, and that TACO may be utilized to obtain closure of the Site. We understand that TACO can be used to calculate less stringent cleanup objectives and help reduce remediation costs, and TACO is being utilized; however the current groundwater concentrations still exceed the highest (least stringent) TACO derived Tier 2 GRO. Within the last few years the only remediation that has occurred is from the existing groundwater recovery and treatment system. This groundwater remediation system works and has been effective in limiting further contaminant migration, but unless the contaminant mass on the side of the hill is addressed, it could take several more years of operation to achieve the Tier 2 GROs.

Therefore, soil excavation is again being proposed to address the main contaminant mass that is slowly desorbing into the groundwater from the saturated soils upgradient of MW-2. Previous soil sampling results suggest that this area of highest soil concentration is approximately 1,000-yd³. (The March 27, 2006, CAP proposed additional soil sampling to better define the extent of the excavation, but these sampling activities and costs were rejected). Historically the saturated soil contaminant plume was much larger, but has diminished with time. Excavation of the most highly contaminated soils will eliminate the contaminant source, which continues to contaminate the groundwater at the bottom of the hill, near the property boundary. Figure 2 provides a Site Plan with the location of monitoring wells. Figure 3 includes the approximate location and excavation extent.

Following removal of the contaminated soil, the groundwater remediation system will be operated only long enough to remove contaminated groundwater at the bottom of hill. Once the contaminant mass immediately upgradient of MW-2 is removed, the groundwater concentrations at MW-2 are expected to decrease and meet the Tier 2 GRO within several months. Monitoring well MW-2 will be sampled for Benzene, Toluene, Ethylbenzene, and total Xylenes (BTEX) monthly, and once the contaminant concentrations at MW-2 meet the Tier 2 GROs, then a complete round of groundwater sampling will be conducted. If all groundwater results are below the Tier 2 GROs, Site closure will be requested.

To calculate the highest Tier 2 GROs, on-site groundwater prohibition must be approved by the property owner, and the on-site potable water well must be formally abandoned. DAI proposes that an Illinois licensed drilling contractor abandon the potable water well following 77 IAC 920.120, Illinois Department of Public Health Water Well Construction Code. Tate & Lyle will also continue to work towards obtaining approval by the current property owner for an on-site groundwater use restriction. Finally, the groundwater remediation system will remain in operation as an intermediate Corrective Action to reduce groundwater concentrations and prevent further groundwater contaminant migration. Appendix A includes a Corrective Action Budget Amendment proposing costs already incurred and to be incurred during final Corrective Actions and Site closure.

2. *It needs to be clarified if the groundwater pump and treat system is still in operation. Any operation of this system after May 2003 will not be eligible for reimbursement.*

Response: Of course the groundwater pump and treatment system is still in operation because as soon as the recovery trench pump is turned off, the area downgradient of the trench will become re-contaminated. Much time, effort, and cost had been expended to remediate this area downgradient of the recovery trench. If we can move beyond the letter writing stage and initiate Corrective Actions, the contaminant source area can be addressed and the groundwater recovery system shut down soon after.

3. *One round of confirmation groundwater sampling for lead should be completed since there have been previously identified Tier 1 exceedances at this site and the most recent lead data collected in response to the release reported at this site was collected in 1999.*

Response: A complete round of groundwater sampling is proposed as part of the final Corrective Actions for the Site. During the groundwater sampling, a complete round of samples will be collected for analysis of Lead and BTEX. Samples will be collected from five (5) monitoring wells for Polynuclear aromatics (PNAs) per the Illinois EPA request in a letter dated June 22, 2000. The table below summarizes the planned sampling regimen.

Proposed Post-Soil Excavation Groundwater Sampling Regimen

Monitoring Well	Sample Parameters	
	BTEX and Lead	PNA
MW-1, MW-2, MW-9, MW-19, RW-1	X	X
MW-3, MW-4, MW-5, MW-5D, MW-6 MW-8, MW-10, MW-11, MW-12, MW-14, MW-15, MW-16, MW-17, MW-18, MW-20, MW-21, MW-22, MW-25, MW-26, MW-27, MW-28, MW-29	X	
MW-7	Well damaged, unable to be sampled	
MW-13	Destroyed	

Note – Some monitoring wells planned for sampling may be destroyed as part of the soil excavation activities. DAI will preserve as many wells as possible.

4. *Hydraulic gradient calculations need to be provided.*

Response: The fate and transport calculations documenting TACO procedures were being used for Site closure. The calculations, utilizing equation R26, include hydraulic gradient as a parameter. As noted in the fate and transport modeling documentation, the hydraulic gradient was taken from the September 19, 2005, potentiometric surface. The hydraulic gradient (0.1-ft/ft) is the difference in groundwater elevation along and downgradient of the contaminant plume (Δ 27-ft as measured at MW-10 and MW-18), divided by the horizontal distance between these wells (270-ft).

5. *The adjacent property cannot be categorized as having Class II groundwater since that property is still within the setback zone of the on-site potable well.*

Response: DAI understands that the neighboring property cannot be designated as Class II groundwater if the property is within the setback zone of the potable water well. An Illinois EPA comment from the May 8, 2006, letter indicated, "...if it can be shown that the on-site potable water supply wells have been properly abandoned..., it may be possible to obtain site closure at this time using a Tier 2 TACO evaluation along with a Class II groundwater demonstration." Tate & Lyle intends on formally abandoning the on-site potable water well, which would then allow for TACO modeling to be used to calculate less restrictive Tier 2 GROs.

However, in the August 2006 CAP Amendment, DAI provided documentation that the downgradient neighboring property meets the Class I groundwater criteria per 35 IAC 620.210 regulations based upon soil stratigraphy and calculated hydraulic conductivity. The August 2006 CAP Amendment requested a determination by Illinois EPA of the off-site downgradient groundwater designation. DAI suggested that if Illinois EPA could designate the downgradient property as Class II, the TACO modeling could be used to calculate even higher (least restrictive) Tier 2 GROs.

6. *All quantitative analyses of samples collected on or after January 1, 2003, shall be conducted by a laboratory accredited for the analyzed parameters...It is not necessary to submit the entire NELAC Certification for a lab, only the form found at...*

Response: Laboratory certifications for all samples collected since the Site elected to proceed under 35 IAC 734 regulations are provided in Appendix B. The certifications include the final quarterly sampling event conducted in December 2003 and all soil and groundwater sampling performed through September 2005 (the most recent laboratory analysis). All future soil and groundwater laboratory results will also be submitted with laboratory certifications.

3.0 CORRECTIVE ACTIONS

This CAP Amendment proposes final Corrective Actions believed necessary to address all outstanding issues and meet Site closure criteria under TACO. Details of the chosen Corrective Action are provided below. A Corrective Action Budget Amendment is included in Appendix A.

Please note that the CAP Addendum of December 20, 2004, proposed that the contaminated saturated soils in the source area be addressed by a combination of soil removal and air sparging. At that time it was considered more cost-effective to remove the most highly contaminated soils and address the remaining soils by desorption and air sparging, rather than attempt to remove all the contaminated soils. Since that time continued groundwater recovery, treated groundwater re-injection, and soil desorption have reduced the extent of contamination in the saturated soils. The request to obtain saturated soil samples was rejected, so the extent of contamination in the saturated soils is not well known; however the best current estimate is an area of about 1,000-yd³. In the interest of minimizing cost and completing the closure as quickly as possible, removal of all the contaminated soil is proposed at this time (and air sparging is no longer necessary).

The Corrective Actions include:

1. Formally abandoning the on-site potable water well;
2. Excavation and disposal of the contaminated soils upgradient of the recovery trench;
3. Sampling of MW-2 until the groundwater remediation system decreases the contamination to less than Tier 2 GRO (estimated as several months);

4. Once the groundwater concentrations at MW-2 meets the Tier 2 GRO, obtaining a full round of closure samples;
5. Submission of a Corrective Action Completion Report (CACR) requesting a letter of No Further Remediation (NFR) for the Site; and,
6. System decontamination and decommission.

3.1 ABANDONMENT OF ON-SITE POTABLE WATER WELL

Formal abandonment of the on-site potable water well will be performed by an Illinois licensed drilling contractor following 77 IAC 920.120. Once the well is abandoned, Tate & Lyle will contact the current property owner to obtain approval for an on-site groundwater prohibition. The on-site groundwater use restriction will be in the form of the property owner's signature on the Property Owner Summary form.

3.2 SOIL EXCAVATION AND DISPOSAL

Removal of the source area will be accomplished by excavating the most highly contaminated saturated soils along the side of the hill. The approximate area to be excavated is shown on Figure 3. The extent and depth of soil contamination has not been determined but the total excavation is estimated at 1,000-yd³. Soils will be removed, transported, and disposed of using licensed special waste handlers. The soils will be profiled for landfill acceptance prior to removal. DAI will manage the soil removal activities and collect confirmatory soil samples to ensure completion of contaminant removal. Documentation of the removal and disposal will be provided to Illinois EPA in the CACR.

3.3 CONTINUED OPERATION OF REMEDIATION SYSTEM

The groundwater remediation system will continue operation until the groundwater concentrations at MW-2 meet the Tier 2 GROs. MW-2 will be sampled and analyzed for BTEX compounds on a monthly basis.

3.4 GROUNDWATER SAMPLING

Once Tier 2 GROs are achieved at MW-2, a complete round of groundwater sampling will be performed. The groundwater sampling will consist of analysis of BTEX, PNAs, and Lead (see Section 2.0).

3.5 CORRECTIVE ACTION COMPLETION REPORT

Following the completion of the above Corrective Actions, a CACR will be submitted detailing the Site history, Site Investigations, and Corrective Actions conducted. Included in the CACR will be a request for an NFR letter closing Incident Number 921798 and the Site. Following the approval of the CACR, DAI will conduct Site restoration and system dismantling activities. Remaining monitoring wells will be abandoned, supplies and equipment will be salvaged or scrapped, and any wastes (e.g. spent activated carbon) will be disposed. Following completion of decommissioning, a final reimbursement package will be submitted to Illinois EPA requesting Corrective Actions and Site Closure costs.

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 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 5/57.17). This form has been approved by the Forms Management Center.

**Illinois Environmental Protection Agency
Leaking Underground Storage Tank Program
Corrective Action Plan**

A. Site Identification

IEMA Incident # (6- or 8-digit): 921798 IEPA LPC# (10-digit): 1490755017

Site Name: Webel Feeds

Site Address (Not a P.O. Box): Rural Route # 3

City: Pittsfield County: Pike ZIP Code: 62363

Leaking UST Technical File

B. Site Information

1. Will the owner or operator seek reimbursement from the Underground Storage Tank Fund? Yes No
2. If yes, is the budget attached? Yes No
3. Is this an amended plan? Yes No
4. Identify the material(s) released: Gasoline (leaded and unleaded), diesel fuel
5. This Corrective Action Plan is submitted pursuant to:
 - a. 35 Ill. Adm. Code 731.166
The material released was:
 - petroleum
 - hazardous substance (see Environmental Protection Act Section 3.215)
 - b. 35 Ill. Adm. Code 732.404
 - c. 35 Ill. Adm. Code 734.335

C. Proposed Methods of Remediation

1. Soil Excavation/disposal
2. Groundwater Remediation, on-site gw prohibition and TACO modeling (if needed)

D. Soil and Groundwater Investigation Results (for incidents subject to 35 Ill. Adm. Code 731 only or 732 that were classified using Method One or Two, if not previously provided)

Provide the following:

1. Description of investigation activities performed to define the extents of soil and/or groundwater contamination;
2. Analytical results, chain-of-custody forms, and laboratory certifications;

3. Tables comparing analytical results to applicable remediation objectives;
4. Boring logs;
5. Monitoring well logs; and
6. Site maps meeting the requirements of 35 Ill. Adm. Code 732.110(a) or 734.440 and showing:
 - a. Soil sample locations;
 - b. Monitoring well locations; and
 - c. Plumes of soil and groundwater contamination.

E. Technical Information - Corrective Action Plan

Provide the following:

1. Executive summary identifying the objectives of the corrective action plan and the technical approach to be utilized to meet such objectives;
 - a. The major components (e.g., treatment, containment, removal) of the corrective action plan;
 - b. The scope of the problems to be addressed by the proposed corrective action; and
 - c. A schedule for implementation and completion of the plan;
2. Identification of the remediation objectives proposed for the site;
3. A description of the remedial technologies selected:
 - a. The feasibility of implementing the remedial technologies;
 - b. Whether the remedial technologies will perform satisfactorily and reliably until the remediation objectives are achieved; and
 - c. A schedule of when the technologies are expected to achieve the applicable remediation objectives;
4. A confirmation sampling plan that describes how the effectiveness of the corrective action activities will be monitored during their implementation and after their completion;
5. A description of the current and projected future uses of the site;
6. A description of engineered barriers or institutional controls that will be relied upon to achieve remediation objectives:
 - a. an assessment of their long-term reliability;
 - b. operating and maintenance plans; and
 - c. maps showing area covered by barriers and institutional controls;
7. The water supply well survey:
 - a. Map(s) showing locations of community water supply wells and other potable wells and the setback zone for each well;
 - b. Map(s) showing regulated recharge areas and wellhead protection areas;
 - c. Map(s) showing the current extent of groundwater contamination exceeding the most stringent Tier 1 remediation objectives;
 - d. Map(s) showing the modeled extent of groundwater contamination exceeding the most stringent Tier 1 remediation objectives;
 - e. Tables listing the setback zone for each community water supply well and other potable water supply wells;
 - f. 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
 - g. 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 (certification of this plan satisfies this requirement);

8. Appendices:
 - a. References and data sources report that are organized; and
 - b. Field logs, well logs, and reports of laboratory analyses;
9. Site map(s) meeting the requirements of 35 Ill. Adm. Code 732.110(a) or 734.440;
10. Engineering design specifications, diagrams, schematics, calculations, manufacturer's specifications, etc.;
11. A description of bench/pilot studies;
12. Cost comparison between proposed method of remediation and other methods of remediation;
13. For the proposed Tier 2 or 3 remediation objectives, provide the following:
 - a. The equations used;
 - b. A discussion of how input variables were determined;
 - c. Map(s) depicting distances used in equations; and
 - d. Calculations;
14. Provide documentation to demonstrate the following for alternative technologies:
 - a. The proposed alternative technology has a substantial likelihood of successfully achieving compliance with all applicable regulations and remediation objectives;
 - b. The proposed alternative technology will not adversely affect human health and safety or the environment;
 - c. The owner or operator will obtain all Illinois EPA permits necessary to legally authorize use of the alternative technology;
 - d. The owner or operator will implement a program to monitor whether the requirements of subsection (14)(a) have been met;
 - e. Within one year from the date of Illinois EPA approval, the owner or operator will provide to the Illinois EPA monitoring program results establishing whether the proposed alternative technology will successfully achieve compliance with the requirements of subsection (14)(a); and
 - f. Demonstration that the cost of alternative technology will not exceed the cost of conventional technology and is not substantially higher than at least two other alternative technologies, if available and technically feasible.
15. Property Owner Summary form.

F. Exposure Pathway Exclusion

Provide the following:

1. A description of the tests to be performed in determining whether the following requirements will be met:
 - a. Attenuation capacity of the soil will not be exceeded for any of the organic contaminants;
 - b. Soil saturation limit will not be exceeded for any of the organic contaminants;
 - c. Contaminated soils do not exhibit any of the reactivity characteristics of hazardous waste per 35 Ill. Adm. Code 721.123;
 - d. Contaminated soils do not exhibit a pH \leq 2.0 or \geq 12.5; and
 - e. Contaminated soils which contain arsenic, barium, cadmium, chromium, lead, mercury, or selenium (or their associated salts) do not exhibit any of the toxicity characteristics of hazardous waste per 35 Ill. Adm. Code 721.124.
2. A discussion of how any exposure pathways are to be excluded.

G. 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: Tate & Lyle
Contact: Don Moster
Address: 2200 East Eldorado Street
City: Decatur
State: Illinois
ZIP Code: 62521-1578
Phone: (217) 421-2452
Signature: Don Moster
Date: 3/26/07

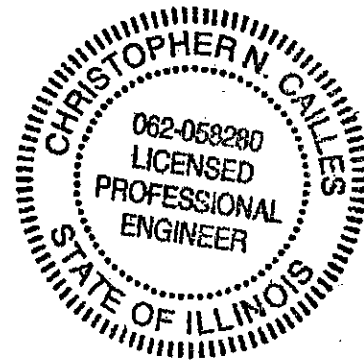
Consultant

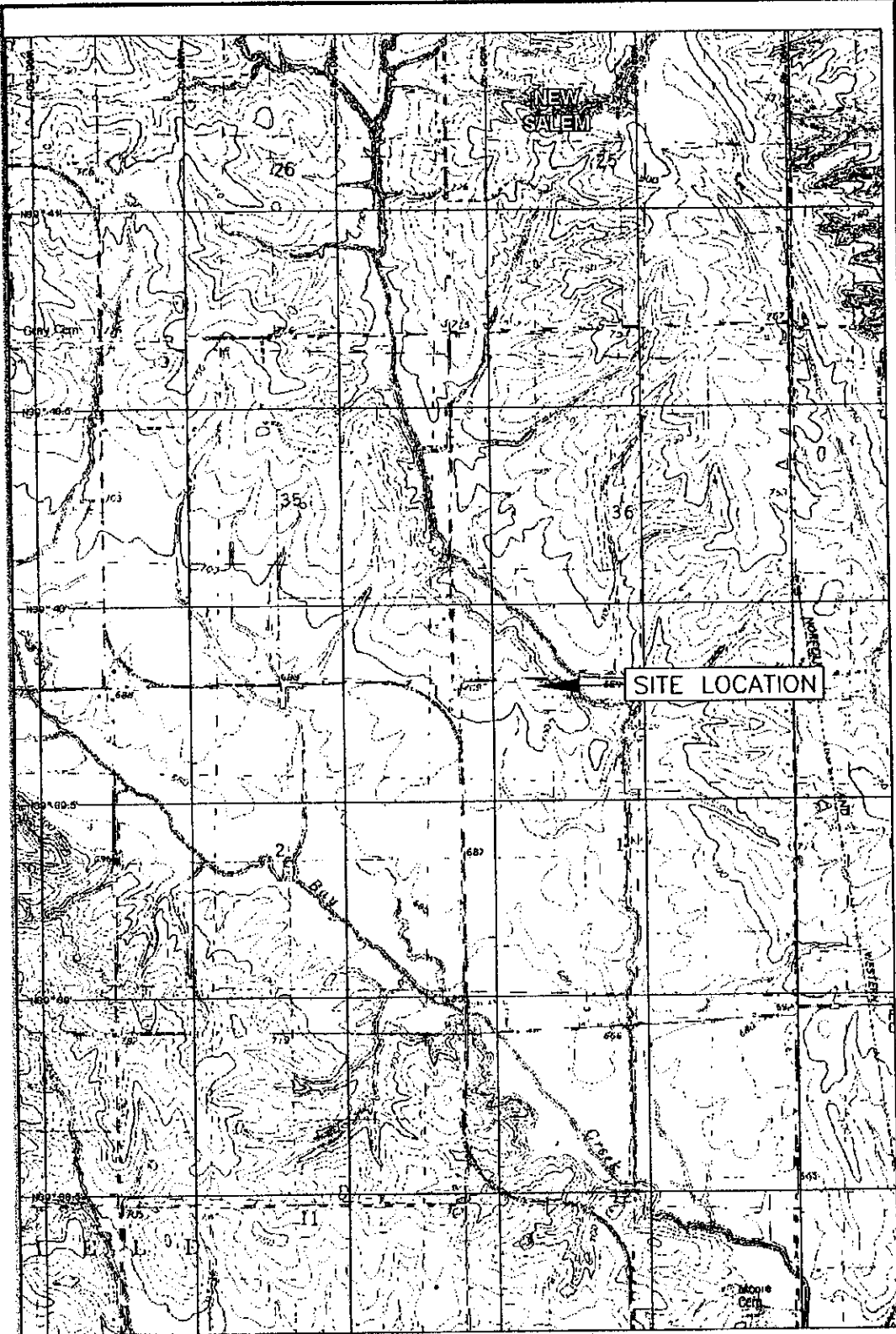
Company: DAI Environmental, Inc.
Contact: F. Thomas DePaul
Address: 27834 North Irma Lee Circle
City: Lake Forest
State: Illinois
ZIP Code: 60045
Phone: (847) 573-8900
Signature: [Signature]
Date: 4/2/07

I certify under penalty of law that all activities that are the subject of this plan 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 and all attachments were prepared under my supervision; that, to the best of my knowledge and belief, the work described in this plan has been completed in accordance with the Environmental Protection Act [415 ILCS 5], 35 Ill. Adm. Code 731, 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].

Licensed Professional Engineer or Geologist L.P.E. or L.P.G. Seal

Name: Christopher Calles
Company: DAI Environmental, Inc.
Address: 27834 North Irma Lee Circle
City: Lake Forest
State: Illinois
ZIP Code: 60045
Phone: (847) 573-8900
Ill. Registration No.: 062-058280
License Expiration Date: 11/30/07
Signature: Christopher Calles
Date: 4/2/07





LEGEND



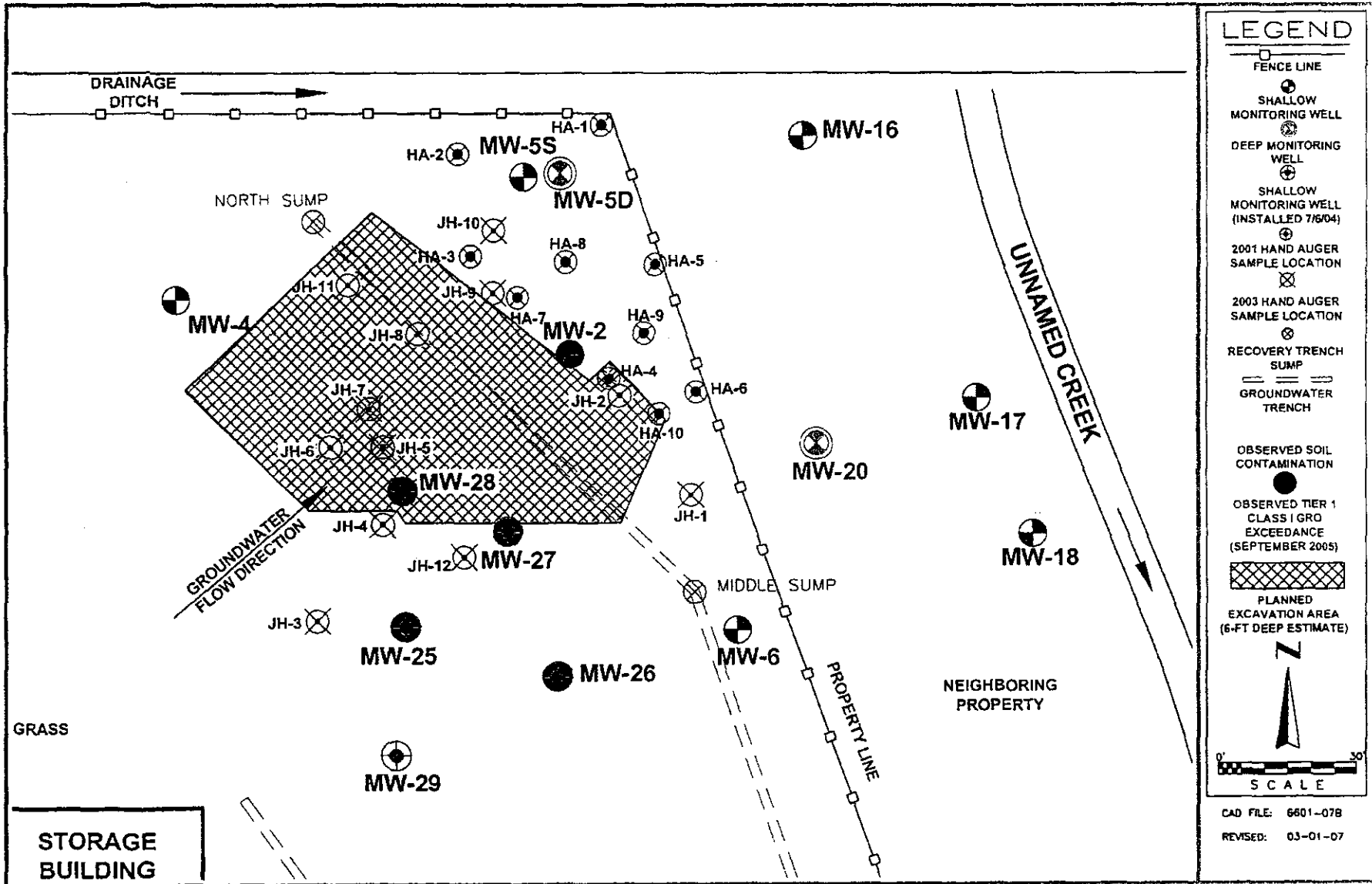
CAD FILE: 6601-02A
 REVISED: 03-02-07

J-D Topo Quads Copyright © 1999 DeLorme Yarmouth, ME 04096 Source Data USGS 742 ft Scale 1:25,000 Detail E-S Datum WGS84



WEBEL FEEDS, INC
 R. R. #3
 PITTSFIELD, ILLINOIS

FIGURE 1
 SITE LOCATION MAP



LEGEND

- FENCE LINE
- SHALLOW MONITORING WELL
- ⊗ DEEP MONITORING WELL
- ⊕ SHALLOW MONITORING WELL (INSTALLED 7/6/04)
- ⊗ 2001 HAND AUGER SAMPLE LOCATION
- ⊗ 2003 HAND AUGER SAMPLE LOCATION
- ⊗ RECOVERY TRENCH SUMP
- ▬ GROUNDWATER TRENCH
- OBSERVED SOIL CONTAMINATION
- OBSERVED TIER 1 CLASS I GRO EXCEEDANCE (SEPTEMBER 2005)
- ▨ PLANNED EXCAVATION AREA (6-FT DEEP ESTIMATE)
- N
- 0' 30' SCALE

CAD FILE: 6601-07B
 REVISED: 03-01-07



WEBEL FEEDS, INC.
 R.R. #3
 PITTSFIELD, ILLINOIS

FIGURE 3
 SITE DETAIL SHOWING EXTENT AND
 LOCATION OF SOIL EXCAVATION