

ILLINOIS POLLUTION CONTROL BOARD

February 23, 2017

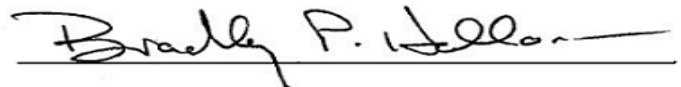
BLAKE LEASING COMPANY, LLC,	)	
	)	
Petitioner,	)	
	)	
v.	)	
	)	PCB 16-100
ILLINOIS ENVIRONMENTAL PROTECTION	)	(Water Well Setback Exception)
AGENCY and VILLAGE OF KIRKLAN,	)	
	)	
Respondents.	)	

HEARING OFFICER ORDER

In an effort to assist the Board in its determination of the above-captioned water well setback exception petition, the petitioner is directed to file written responses addressing the attached questions on or before March 17, 2017.

The parties or their legal representatives are directed to participate in a telephonic status conference with the hearing officer on March 7, 2017, at 10:30 a.m. The telephonic conference must be initiated by the petitioner, but each party is nonetheless responsible for its own appearance. At the conference, the parties must be prepared to discuss the status of the above-captioned matter and their readiness for hearing

. IT IS SO ORDERED.



Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center, Suite 11-500
100 W. Randolph Street
Chicago, Illinois 60601
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The Board directs Blake Leasing to respond to the following questions.

1. The amended petition (Am. Pet.) states, “Active remediation was initially requested because it was believed that the Subject Property was located within the setback zone of the Village of Kirkland emergency backup water supply well, referred to as Well #11424, (Well #1) and the main Village supply well, referred to as Well #11425 (Well #2).” Am. Pet. at 2. It also asserts, “Testing results performed in August 2016 demonstrated and confirmed that both the area of residual contamination and the UST system owned and operated by the Petitioner are outside the minimum setback zone for Well #2, the primary Village Community Well.” Am. Pet. at 3, 11. However, the Amended petition does not identify the applicable well or wells.

Blake must clearly state which well or wells require a water well setback exception pursuant to 415 ILCS 14.2(c).

2. Should the “Technical Report”, Exhibit A to the amended petition, be dated January 5, 2017 rather than 2016?
3. Blake Leasing states that the proposed air sparging includes the installation of 12-15 air injection stingers via 1-inch diameter monitoring wells. Am. Pet. at 10, Exh. A. Att. C. Blake states, “the Petitioner will utilize the maximum feasible alternative setback as required by this Board to encompass and address the entire KQS site.” Am. Pet. at 11. In its response (IEPA Resp.) IEPA explains, “the maximum feasible setback is considered to assure that the greatest possible distance between a potential source or potential route, and a potable well is maintained. In the case of injective remedial technologies, the maximum feasible distance is necessarily as close as the contaminants of remedial concern.” IEPA Resp. at 8.
 - (a) Consistent with the IEPA’s response to Blake’s amended petition, Blake must submit a map displaying the proposed air sparging system. IEPA Resp. at 8, 9. The map must delineate the number, location, and depth of each planned air sparging injection point along with the location and number of all potable water supply wells. If possible, the map should also overlay the areas of highest contaminant concentration.
 - (b) Identify any wells, in addition to Municipal Water Supply Well #2 and Emergency Backup Well #1, which require a water well setback exception. Provide precise information about the number, location, depth, and use for these additional wells.
 - (c) Submit a legible well survey and clearly identify, by number, any potable water supply wells affected by the requested exception.

- (d) Quantify, in feet, the maximum feasible alternative setback between the injection locations and Municipal Water Supply Well #2, Emergency Backup Well #1, and any other potable wells for which setback requirements would be affected by the requested exception.
- 4. Explain why air sparging is the best available control technology for the Blake site over the previously proposed enhanced bioremediation with a detailed comparison of the two technologies.
- 5. Provide a detailed justification for the placement of the air sparging wells in relation to the areas of contamination at the Blake site. How does placement of the air sparging wells address the plume of contamination at the site?
- 6. Indicate whether IEPA will require Blake Leasing to obtain an Underground Injection Control Permit for Class V injection wells pursuant to 35 Ill. Adm. Code 704.147.
- 7. Elaborate on the conclusion that “turbidity is likely to have caused the low level detections of PNA compounds slightly above Class I GROs”. Am. Pet. Exh. A at 7-8.
 - (a) Provide additional sampling reports to support this conclusion, if available.
 - (b) If no additional sampling reports exist, comment on an exception condition requiring such sampling as a part of the remediation plan.
 - (c) What techniques will sampling technicians employ to “be watchful of turbidity during future sampling events”? Am. Pet. Exh. A at 8.
- 8. Regarding groundwater monitoring:
 - (a) Describe, in detail, how Blake will determine if the air sparging is successful. List and explain the criteria that will be used to make that determination?
 - (b) Provide comprehensive information about the potential for contaminant rebound after the air sparging has begun.
 - (c) Explain how long Blake anticipates remediation will take?
 - (d) Comment on an exception condition requiring a minimum of four consecutive quarters of groundwater sampling to demonstrate compliance with the Groundwater Remediation Objectives after the air sparging injections have been discontinued.
 - (e) Explain whether the air sparging injections may change the character of the groundwater supply for the Village of Kirkland.
- 9. Regarding well closure:

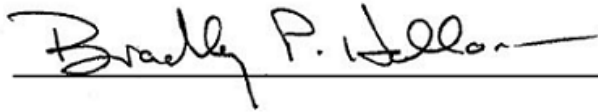
- (a) Indicate whether the air sparging wells will be abandoned and sealed after receipt of the NFR letter from IEPA.
- (b) Comment on an exception condition requiring the wells to be properly abandoned and sealed upon IEPA's issuance of a NFR letter.
- (c) Comment on an exception condition terminating the water well setback exception automatically upon IEPA's issuance of a NFR letter.

CERTIFICATE OF SERVICE

It is hereby certified that true copies of the foregoing order were e-mailed on February 23, 2017, to each of the persons on the service list below.

It is hereby certified that a true copy of the foregoing order was hand delivered to the following on February 23, 2017:

Don Brown
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph St., Ste. 11-500
Chicago, Illinois 60601



Bradley P. Halloran
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