

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

BLAKE LEASING COMPANY, LLC,	)	
	)	
Petitioner,	)	
	)	
v.	)	PCB 2016-100
	)	(Water Well Setback Exception)
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY and VILLAGE	)	
OF KIRKLAND,	)	
	)	
Respondent.	)	

NOTICE OF FILING

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board ILLINOIS EPA'S RESPONSE TO PETITIONER'S RESPONSES TO THE ILLINOIS POLLUTION CONTROL BOARD QUESTIONS, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Joanne M. Olson
Joanne M. Olson
Assistant Counsel
Division of Legal Counsel

Date: March 23, 2017

Joanne M. Olson #6293500
Illinois Environmental Protection Agency
Division of Legal Counsel
1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

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**ILLINOIS EPA'S RESPONSE TO PETITIONER'S RESPONSES TO THE ILLINOIS
POLLUTION CONTROL BOARD QUESTIONS**

NOW COMES the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ("Illinois EPA" or "Agency"), by and through its counsel, and pursuant to 35 Ill. Adm. Code 101.500, hereby submits its response to BLAKE LEASING COMPANY, LLC's ("Petitioner" or "Blake") Responses to the Illinois Pollution Control Board's ("Board") questions of February 23, 2017.

The Agency has reviewed Blake's responses to the Board's questions. The Agency generally concurs with the information that Blake and its consultant SM&A have provided. In its response to the Board Question 1, Blake responds that injection wells will only be located within the setback zone of Well #1 (11424). Referring to Figure 1a, the Agency notes that monitoring wells MW-1 and MW-15, which have exceedences of remedial objectives, have injection wells both up gradient and down gradient of their locations. However, MW-3a, MW-14 and MW-6, which have higher concentrations of contaminants and consistently exceed remedial objectives do not have injection wells immediately down gradient of their locations. The Agency acknowledges that much of the Blake property where the injection wells are

proposed has low dissolved oxygen (DO) concentrations, however, the majority of monitoring wells in that area do not have exceedences of remedial objectives. Even though MW-18 has higher levels of DO, MW-19 periodically falls below the 1.0 mg/L DO that Blake has established as the threshold for natural biologic action to take place. The Agency also recognizes that Blake's property ends just north of MW-3a, MW-14 and MW-6. Blake has installed monitoring wells between its property and railroad property, therefore Blake appears to have access to this area. The Agency believes it is advisable for Blake to install injection wells in the same area.

In support of its opinion, the Agency notes that the DO iso-concentration lines in Figures 1a, 1b and 1c all show significant reductions in DO concentrations immediately up gradient of MW-3a, MW-14 and MW-6. Therefore, that reduced oxygen water is migrating towards the residual hydrocarbons. Furthermore, the high concentrations of hydrocarbons in these wells indicate that some level of hydrocarbons above the remedial objectives is likely to exist between wells MW-3a, MW-14 and MW-6, and MW-18 and MW-19 where remedial objectives are being met. The Agency is aware that installation of injection wells in this area may be within the setback zone of Well #2 (11425). The Agency believes that Blake has presented information that adequately demonstrates the safety and likely efficacy of the proposed air sparging. In the interest of achieving remediation goals as has been proposed, the Agency fully supports the installation of these injection wells within the setback zones of both Wells #1 (11424) and #2 (11425), as needed to meet those goals. The Agency is concerned that remedial goals may not be met for lack of including a small portion of the Well #2 (11425) setback zone in this petition and therefore limiting the ability to install injection wells in that small area.

WHEREFORE, the Illinois EPA respectfully submits its Response.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/Joanne M. Olson
Joanne M. Olson
Assistant Counsel
Division of Legal Counsel

Joanne M. Olson #6293500
Illinois Environmental Protection Agency
Division of Legal Counsel
1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276
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CERTIFICATE OF SERVICE

Joanne M. Olson, Assistant Counsel for the Illinois EPA, herein certifies that she has served a copy of the foregoing NOTICE OF FILING and ILLINOIS EPA'S RESPONSE TO PETITIONER'S RESPONSES TO THE ILLINOIS POLLUTION CONTROL BOARD QUESTIONS upon

Village of Kirkland
Attn: Mayor Les Bellah
511 W. Main Street
Kirkland, Illinois 60146
Mayor_bellah@mchsi.com

Charles F. Helsten
Hinshaw & Culbertson LLP
100 Park Avenue
P.O. Box 1389
Rockford, IL 61105-1389
CHelsten@hinshawlaw.com

Brad Halloran
Hearing Officer
Brad.Halloran@illinois.gov

Scott Puma
Ancel, Glink, Diamond, Busch, DiCianni &
Krafthefer, P.C.
175 Hawthorn Parkway, Suite 145
spuma@ancelglink.com

by placing a true copy in an envelope duly addressed bearing proper first class postage in the United States mail at Springfield, Illinois on March 23, 2017, or by sending an email from my email account (joanne.olson@illinois.gov) to the email addresses designated below with the following attached as a 5 page PDF document in an e-mail transmission on or before 5:00 pm on March 23, 2017.

/s/Joanne M. Olson
Joanne M. Olson