

BEFORE THE POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS

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APR 25 2011  
STATE OF ILLINOIS  
Pollution Control Board

WARSAW ITCO, )  
 )  
Petitioner, )  
 )  
vs. )  
 )  
ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
 )  
Respondent. )

PCB No. 11-76  
(UST Appeal – Petition for Review and  
Hearing/Appeal)

**PETITION FOR REVIEW AND HEARING/Appeal**

NOW COMES Warsaw ITCO, by its attorneys, Elias, Meginness, Riffle & Seghetti, P.C., and as and for its Petition for Review and Hearing/Appeal of the Illinois Environmental Protection Agency's final decision with respect to the modification of the budget for a Amended Corrective Action Plan for a certain leaking underground storage tank (LUST) site, (which denied, in part, requested budget increases) states as follows:

**BACKGROUND**

1. Warsaw ITCO retained Midwest Environmental Consulting & Remediation Services, Inc. (Midwest) to remediate the property located at Route 122, Minier, Illinois, LPC #1790455007-Tazewell County, LUST Incident No. 981987 (the Property).

2. The Property was the site of remediation and investigation activities to include UST removal, soil borings/wells, and corrective action planning, installation and operation of a groundwater treatment system, HAA, groundwater ordinance, and reports. No work was

performed outside the required guidelines and was within acceptable LUST Fund reimbursement requirements.

3. By letter dated November 8, 2010, Midwest submitted an Amended Corrective Action Plan and Budget, seeking approval of the additional budget amount of \$60,241.81, which is the amount that was reasonable and necessary to complete the work on the project. A true and correct copy of that submittal is attached hereto as Exhibit A.

4. By letter dated March 18, 2011 (and delivered on March 19, 2011 by certified mail), the IEPA denied certain amounts within the Amended Corrective Action Plan and Budget. A true and accurate copy of the March 18, 2011 letter and attachments is attached hereto as Exhibit B. That letter was designated as a final and appealable order.

### **ARGUMENT**

The IEPA rejected the Budget as submitted with respect to Personnel Costs and Field Purchase and Other Costs based upon their findings that these costs are not consistent with materials, activities, and services associated with an Illinois EPA-approved technical plan. They deducted the amount of \$34,790.00 from the Personnel Costs, and deducted \$7,800 from Field Purchase and Other Costs. Warsaw ITCO (and Midwest) disagree with this determination, and affirmatively state that the proposed budget amounts are reasonable, customary, and necessary for the proper completion of the project and site closure.

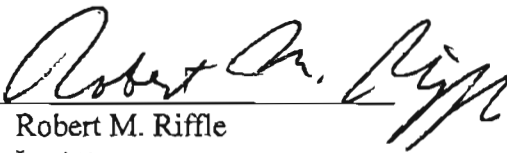
### **CONCLUSION**

For all of the foregoing reasons, Warsaw ITCO respectfully requests a hearing in this matter, which will provide it the opportunity to establish the propriety of the costs, and that the

Final Decision be reversed or modified by increasing and accepting the budget as proposed in Exhibit B, thereby approving the budget amendment in the amount of \$60,241.81.

Respectfully submitted,

WARSAW ITCO, Petitioner

By:   
Robert M. Riffle  
Its Attorney

ROBERT M. RIFFLE  
Elias, Meginnes, Riffle & Seghetti, P.C.  
416 Main Street, Suite 1400  
Peoria, IL 61602  
(309) 637-6000  
611-350

CERTIFICATE OF SERVICE

The undersigned certifies that on April 20, 2011, a copy of the foregoing document was served upon each party to this case by

Enclosing a true copy of same in an envelope addressed to the attorney of record of each party as listed below, with first class postage fully prepaid, and depositing each of said envelopes in the United States Mail at 5:00 p.m. on said date.

Personal delivery to the attorney of record of each party at the address(es) listed below

Facsimile transmission with confirmation by United States Mail

Via Federal Express - Express Package Service - Priority Overnight

Dorothy M. Gunn, Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph Street  
Suite 11-500  
Chicago, IL 60601

Illinois Environmental Protection Agency  
Division of Legal Counsel  
1021 North Grand Ave. East  
Post Office Box 19276  
Springfield, IL 62794-9276



Robert M. Riffle  
Elias, Meghinnes, Riffle & Seghetti, P.C.  
416 Main Street, Suite 1400  
Peoria, IL 61602  
(309) 637-6000  
611-232

# Midwest Environmental Consulting & Remediation Services Inc.

22200 Illinois Route 9 • P.O. Box 614  
Tremont, IL 61568-0614  
Phone: (309) 925-5551 • Fax: (309) 925-5606

November 8, 2010

Mr. Jim Ransdell  
Illinois Environmental Protection Agency  
Bureau of Land - #24  
LUST Section  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, Illinois 62794-9276

Re: LPC #1790455007 – Tazewell County  
Minier/Warsaw, Howard  
Route 122  
LUST Incident No. 981987  
LUST Technical File


Dear Mr. Ransdell:

Attached please find the Corrective Action Plan and Budget Amendment for the subject site.

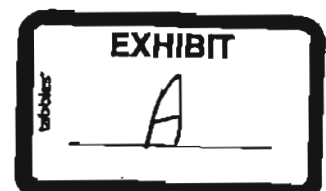
If you have any questions or comments, please contact our office.

Sincerely,

Midwest Environmental Consulting and Remediation Services, Inc.

  
Allan M. Green  
President

PLS/gle  
cc: Mr. Howard Warsaw  
Attachments  
Job No. 9890



Leaking Underground Storage Tank Program  
High Priority Corrective Action Plan Amendment

**Incident Location:** Warsaw - ITCO  
Route 122  
Minier, Illinois – Tazewell Co.

**Prepared for:** John Warsaw  
PO Box 886  
Minier, Illinois 61759

**Prepared by:** Midwest Environmental Consulting  
and Remediation Services, Inc.  
22200 Illinois Route 9  
Post Office Box 614  
Tremont, Illinois 61568-0614  
Contact: Allan Green – President

**For Review by:** Illinois Environmental Protection Agency  
Bureau of Land - #24  
LUST Section  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, Illinois 62794-9276  
Contact: Mr. Jim Ransdell

## High Priority Corrective Action Plan Amendment

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**IEPA CORRECTIVE ACTION PLAN FORM**



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 Form Management Center.

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

### A. Site Identification

IEMA Incident # (6- or 8-digit): 981987 IEPA LPC# (10-digit): 1790455007

Site Name: Warsaw, Howard

Site Address (Not a P.O. Box): IL Rt 122

City: Minier County: Tazewell ZIP Code: 61759

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

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 TACO, evaluation of exposure pathways

2. Groundwater TACO, evaluation of exposure pathways

### 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: Howard Warsaw  
 Contact: John Warsaw  
 Address: P.O. Box 886  
 City: Minier  
 State: IL  
 ZIP Code: 61759  
 Phone: (309) 648-3397  
 Signature: [Handwritten Signature]  
 Date: 11/13/10

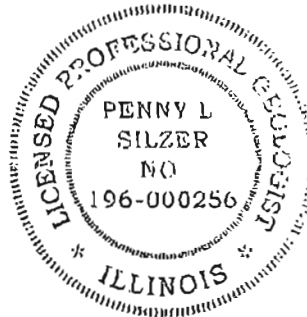
**Consultant**

Company: Midwest Environmental Consulting  
 Contact: Mr. Allan Green  
 Address: 22200 IL Route 9, P.O. Box 614  
 City: Tremont  
 State: Illinois  
 ZIP Code: 61568  
 Phone: (309) 925-5551  
 Signature: [Handwritten Signature]  
 Date: 11/8/10

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: Penny Silzer  
 Company: Midwest Environmental  
 Address: 22200 IL Route 9, P.O. Box 614  
 City: Tremont  
 State: Illinois  
 ZIP Code: 61568  
 Phone: (309) 925-5551  
 Ill. Registration No.: 196-000256  
 License Expiration Date: 03/31/11  
 Signature: [Handwritten Signature]  
 Date: 11/8/10



**SECTION D**

**BACKGROUND/CORRECTIVE ACTION IMPLEMENTATION REPORT**

This portion of the report follows the Illinois Environmental Protection Agency (IEPA) Corrective Action Plan Form (IL 532 2287; LPC 513) dated March 2006.

## **Section D. Soil and Groundwater Investigation Results**

### **1. Description of investigation activities performed to define the extents of soil and/or groundwater contamination.**

The subject site is currently a gasoline service station located on Route 122 in Minier, Illinois. The area is developed for commercial, residential and agricultural use. An area map is provided in Figure 1.

Three underground storage tanks (USTs) were removed from the site on July 6, 1999. The three tanks (1-2,000 gallon, 2-500 gallon) were used for gasoline. Details of the UST removal/free product removal activities can be found in the Report of Early Action/ Amended 45-Day Report dated August 31, 1999 and the Free Product Removal Report dated August 26, 1999, previously submitted to IEPA.

Between May 2000 and August 2001, Midwest Environmental Consulting and Remediation Services, Inc. (MECRS) installed seven groundwater monitoring wells (MW-1 through MW-7) and drilled seven soil borings (B-1 through B-7). Additional soil samples were collected from a recovery trench installed in October 2003 (T-1 through T-10).

### **2. Analytical results, chain-of-custody forms and laboratory certifications.**

All analytical laboratory reports, chain of custody forms and laboratory certifications for data collected have been submitted to the IEPA in previous reports.

### **3. Tables comparing results to applicable remediation objectives.**

Please see Tables 1 and 2.

### **4. Boring Logs**

All boring logs have been submitted to the IEPA in previous reports.

### **5. Monitoring Well Logs**

All monitoring well logs have been submitted to the IEPA in previous reports.

### **6. Site maps meeting the requirements of 35 Ill. Admin. Code 732.110(a) or 734.440 and showing:**

- a. Soil Sample Locations**
- b. Monitoring Well Locations**
- c. Plumes of soil and groundwater contamination**

Please see Figures 1 through 4.

**SECTION E**

**TECHNICAL INFORMATION – CORRECTIVE ACTION PLAN**

## Section 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.**

Installation of a groundwater recovery trench and aeration treatment took place in October 2003. Site visits have been conducted on a monthly basis for the purpose of monitoring the system progress, conduct routine operation and maintenance, and to take influent and effluent samples (if applicable). Since installation of the groundwater treatment system, groundwater has passed through the treatment system only during years of above average rainfall. The groundwater treatment system operated from 2003 until October of 2007 when the system was hit by a car and rendered inoperable. The system was repaired and restarted in March of 2009. The system operated from March of 2009 until July 2009 when the blower motor burned out. The system is currently down while the blower motor is being rebuilt.

MECRS presented alternatives to the IEPA to enhance the system in 2005 and 2010. The IEPA has yet to approve any of the plans.

Corrective action activities began at this site in August of 2000. Since that time, the IEPA's overall approach to corrective action has changed, relying more on the Tiered Approach to Cleanup Objectives (TACO) regulations and the use of engineered barriers and institutional controls. It appears that the site may meet the criteria for "No Further Action" by invoking engineered barriers and by establishing institutional controls.

The following engineered barriers and institutional controls are proposed for the site to address all residual contamination by limiting human exposure to contaminants in excess of Tier 1 CUOs:

1. MECRS will propose to the Village of Minier that the Village adopt a groundwater use restriction ordinance which meets the criteria for approval as an institutional control. If the Village adopts the ordinance, in accordance with 742.1015, groundwater models will be calculated to identify the properties under which groundwater may potentially be located which exceeds the applicable groundwater remediation objectives. Collection of additional site specific parameters will be necessary to calculate the groundwater models. A copy of the request sent to the Village of Minier for a groundwater use restriction ordinance is provided in Appendix A. A draft copy of the property owner notification letter is presented in Appendix D.
2. MECRS will request a Highway Authority Agreement (HAA) with the Illinois Department of Transportation (IDOT) to address the potential for contamination under Ill. Rt. 122 adjacent to the site. A copy of the HAA request is included in Appendix B.



3. The concrete at the site will be designated as an engineered barrier to eliminate inhalation and ingestion exposure pathways.
4. The site will be limited to industrial/commercial use.
5. A environmental land use control (ELUC) will be required with the property located to the east of the site. A draft copy of the ELUC is provided in Appendix C.
6. A construction worker precautionary statement is requested to be included in the "No Further Remediation" letter.

The time required for the Village of Minier to adopt a groundwater use restriction ordinance is undetermined. Collection of the required site specific data required to calculate the groundwater models can be completed immediately upon receipt of approval of this plan. Groundwater models will be calculated once the data has been received. Letters to property owners will be sent after the Village adopts a groundwater use restriction ordinance and the models have been calculated. Based on previous experiences with IDOT, it will take 12 to 18 months for IDOT to review and approve the HAA. An ELUC will be requested from neighboring property owner where soil contamination in excess of Tier 1 CUOs is present. With the exception of the HAA, the tasks listed above will be completed within 60 days of receipt of approval of this plan.

**2. Identification of the remediation objectives proposed for the site.**

All exposure routes can be eliminated on-site. Remediation objectives need not be calculated.

Tier 1 Cleanup objectives apply to all off-site soil and groundwater.

- 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.**

Does Not Apply.

- 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.**

Other than collection of site specific TACO parameters, no additional sampling is necessary.

**5. A description of the current and projected future uses of the site.**

The site is an active gas station. There are no current plans for a change in use of the property.

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**

The following institutional controls are proposed for the site:

1. Village of Minier Groundwater Use Restriction Ordinance
2. Highway Authority Agreement with IDOT
3. ELUC with the property owner to the east of the site.
4. Industrial/Commercial Land Use Restriction
5. A Construction Worker Precautionary statement in the NFR letter

The following engineered barriers are proposed for the site:

1. The Building
2. The pavement

The areas covered by engineered barriers and institutional controls are shown in Figures 5 and 6, respectively.

A copy of the request for the Village Of Minier to consider a groundwater use restriction ordinance is provided in Appendix A. A copy of the HAA request sent to IDOT is provided in Appendix B. A draft copy of the ELUC is presented in Appendix C.

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;**
  - g. **A certification form 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 the requirement).**

The water supply well survey was presented to the IEPA in the Site Classification Completion Report dated July 14, 2000 as provided below:

The population of Minier, Illinois is estimated to be 1,155. The area surrounding the subject site has been developed for light industrial, commercial and residential use. Water for the area is supplied by the municipal supply. Water quality is reported as good. No reports of petroleum contamination of the area water supply have been recorded.

Research completed by MECRS indicates that the former UST system is not located within 2,500 feet of any community water supply wells. Communication between MECRS, the Illinois State Water Survey (ISWS), the Illinois Environmental Protection Agency-Division of Public Water Supply (IEPA), the Village of Minier, and the Illinois State Geological Survey (ISGS) confirms that the former UST system located at the subject site does not pose a threat to community or potable water supply wells (see attached documents in Appendix E).

Research by the ISWS of the Public-Industrial-Commercial (PICS) Database indicates that there are no industrial/commercial water supply wells located within 2,500 feet of the site. Information from the IEPA-Division of Public Water Supply (DPWS) confirms that the site is located outside 2,500 feet radius of any community water supply well. Information from the IEPA-DPWS also confirms that there have not been any regulated recharge areas established pursuant to Section 17.3 of the Illinois Environmental Protection Act. The IEPA-DPWS also confirms that no Class III Groundwater has been designated in the vicinity of the site.

Mr. Robert Cremeens of the Village of Minier was contacted. Mr. Creemens indicated the water supply for the city comes from two wells located greater than 2,500 feet from the subject site. The setback zones for these wells are 200 feet. Minier has a local ordinance against the use of private wells within the village limits. All water for city residents must be purchased from the municipal supply.

A detailed well survey including well chart and map can be found in Appendix E.

- 8. Appendices;**
- a. References and data sources report that are organized, and;**
  - b. Field logs, well logs and reports of laboratory analyses:**

Please see Appendices A through G.

- 9. Site map(s) meeting the requirements of 35 Ill. Admin. Code 732.110(a) or 734.440;**

Please see Figures 1 through 6.

- 10. Engineering design specifications, diagrams, schematics, calculations, manufacturer's specification, etc.;**

Does not apply.

- 11. A description of bench/pilot studies;**

Does not apply.

**12. Cost comparison between proposed method of remediation and other methods of remediation;**

Does not apply.

**13. For the proposed Tier 2 or 3 remediation objectives, provide the following:**

- a. The equations used;
- b. A discussion of how input parameters were determined
- c. Map(s) depicting distances used in equations; and
- d. Calculations

Groundwater models will be calculated for soil sample locations where concentrations of COCs exceed the Tier 1 CUOs for the soil component of the groundwater ingestion route using equations R14 and R26 and for groundwater samples where concentrations of COCs exceed the Tier 1 CUOs for the groundwater component of the groundwater ingestion route using equation R26.

The following data is needed to complete calculation of the groundwater model:

The groundwater monitoring wells where benzene is present have not been sampled since February 2, 2002. MECRS proposes to resample monitoring wells MW-4 and MW-7 to gather current groundwater chemical data. The samples will be analyzed for BTEX. Depth to groundwater levels will be measured in all wells at the same time monitoring wells MW-4 and MW-7 are sampled for determination of groundwater flow direction and gradient.

In-site hydraulic conductivity testing will be conducted by means of a slug test to more accurately determine hydraulic conductivity.

The following subsurface soil data is needed to complete calculation of the groundwater model:

Parameter	Value	Source
pH	No Value	To be determined
organic carbon content of soil ( $f_{oc}$ )	2.55%	Lab 8/23/01
Hydraulic Conductivity (K)	No Value	To be determined
Gradient (i)	No Value	To be determined
Soil bulk density ( $\rho_s$ )	1.77 g/cm <sup>3</sup>	Lab 9/4/01
soil particle density	No Value	To be determined
Moisture content	17.1%	Lab 9/4/01

A soil sample will be collected from a hand auger boring from three feet below ground surface (bgs) and will be analyzed for pH, soil particle density and moisture content. A slug test for determining hydraulic conductivity will be conducted in monitoring well MW-1 where the sandy water bearing zone is the thickest. Groundwater levels will be measured to determine the gradient. The proposed hand auger boring location is shown in Figure 7. Copies of the laboratory reports for the TACO parameters previously collected are provided in Appendix F. The costs associated with the data collection is presented in the budget amendment in Appendix G.

All input parameters, equations used and calculations will be presented to the IEPA in the next report.

- 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;**

Does Not Apply.

**15. Property Owner Summary form.**

The Owner Summary form will be included in the forms section of the Corrective Action Completion Report.

**SECTION F**

**EXPOSURE PATHWAY EXCLUSION**

**F. Exposure Pathway Exclusion**

Provide the following:

**1. A description of the test 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;**

The attenuation capacity of the soil is 2550 ppm based on the natural organic carbon content (foc) determined by lab and reported to the IEPA in the Corrective Action Plan dated January 29, 2002. The maximum sum of the organic contaminant concentrations in one sample is 299 ppm found in soil sample B-2, 8 to 10 ft bgs.

- b. **Soil saturation limit will not be exceeded for any of the organic contaminants**

COC	Max Concentration	C <sub>snt</sub>
Benzene	11.6 ppm	870 ppm
Toluene	42.7 ppm	650 ppm
Ethylbenzene	47 ppm	400 ppm
Xylenes	190 ppm	320 ppm

Soil saturation limits have not been exceeded.

- c. **Contaminated soils do not exhibit any of the reactivity characteristics of hazardous waste per 35 Ill. Admn. 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 no exhibit any of the toxicity characteristics of hazardous water per 35 Ill. Adm. Code 721.124.**

The soil does not exhibit any of the characteristics of reactivity for hazardous waste. The contaminants of concern are petroleum hydrocarbon related. Metals are not contaminants of concern for this site. Concentrations of petroleum hydrocarbons in soil at the site are considered non-hazardous. Soil from the site was accepted at Tazewell RDF as declassified special waste under profile number SM3229.

**2. A discussion of how nay exposure pathways are to be excluded.**

All residential exposure scenarios can be eliminated by limiting the site to industrial/commercial use in the "No Further Remediation" (NFR) letter.

The industrial/commercial soil inhalation and ingestion exposure pathways can be eliminated by designating the pavement and the building as engineered barriers. The location of the engineered barrier is shown in Figure 5.

The groundwater ingestion pathway will be eliminated if the Village of Minier adopts the proposed groundwater use restriction ordinance.

The construction work soil inhalation and ingestion exposure pathways can be eliminated by including a construction worker precautionary statement in the NFR letter.



**SECTION G**

**BUDGET SUMMARY**

### **G. Budget Summary**

The attached budget includes anticipated costs associated with the work proposed in this CAP and for personnel time associated with the following complete tasks:

1. Costs associated with obtaining an air permit.
2. Costs associated with obtaining a sewer discharge permit.
3. Costs associate with researching alternatives for enhancing the treatment system due to the slow of groundwater recovery.

**BUDGET AND BILLING FORM FOR  
LEAKING UNDERGROUND STORAGE  
TANK SITES**

**A. SITE INFORMATION**

Site Name: Warsaw, Howard

Site Address: Route 122 City: Minier

Zip: 61759

County: Tazewell IEPA Generator No.: 1790455007

IEMA Incident No: 981987 IEMA Notification Date: May 19, 1999

Date this Form was Prepared: November 5, 2010

This form is being submitted as a:

Budget Proposal

Budget Amendment (Budget Amendments must include only the costs over the previous budget)

Amendment Number: 4

Billing Package for costs incurred pursuant to 35 Illinois Administrative Code (IAC), Part 732 ("new program")

Name(s) of report(s) documenting the costs requested: \_\_\_\_\_

Date(s): \_\_\_\_\_

This form is being submitted for the Site Activities indicated below (check one):

Early Action

Site Classification

Low Priority Corrective Action

High Priority Corrective Action

Other (indicate activities): \_\_\_\_\_

**DO NOT SUBMIT "NEW PROGRAM" COSTS AND "OLD PROGRAM"  
COSTS AT THE SAME TIME, ON THE SAME FORMS.**

A-1

IEMA NO. 981987

If eligible for reimbursement, where should reimbursement checks be sent? Please note that only owners or operators or USTs may be eligible for reimbursement. Therefore, payment can only be made to an owner or operator.

Pay to the order of: Howard Warsaw

Send in care of: Howard Warsaw

Address: Route 122

City: Minier State: IL Zip: 61759

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: X 101 or more: \_\_\_\_\_

Number of USTs at the site: 7 (Number of USTs included USTs presently at the site and USTs that have been removed.)

Number of incidents reported to IEMA: 2

Incident Numbers assigned to the site due to releases from USTs: 981987, 991610

Please list all tanks which have ever been located at the site and are presently located at the site:

Product Stored	Size (gallons)	Did UST have a release?		Incident No.	Type of Release
<u>gasoline</u>	<u>500</u>	<u>Yes</u>	<u>No</u>	<u>981987, 991610</u>	<u>UST &amp; Piping leak, spills/overfills</u>
<u>gasoline</u>	<u>500</u>	<u>Yes</u>	<u>No</u>	<u>981987, 991610</u>	<u>UST &amp; Piping leak, spills/overfills</u>
<u>gasoline</u>	<u>2,000</u>	<u>Yes</u>	<u>No</u>	<u>981987, 991610</u>	<u>UST &amp; Piping leak, spills/overfills</u>
<u>diesel</u>	<u>2,500</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>N/A</u>
<u>gasoline</u>	<u>2,500</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>N/A</u>
<u>gasoline</u>	<u>2,500</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>N/A</u>
<u>gasoline</u>	<u>2,500</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>N/A</u>
_____	_____	<u>Yes</u>	<u>No</u>	_____	_____
_____	_____	<u>Yes</u>	<u>No</u>	_____	_____

**B. PROPOSED BUDGET SUMMARY AND BUDGET TOTAL**

1. Investigation Costs:	<u>\$0.00</u>
2. Analysis Costs:	<u>\$362.79</u>
3. Personnel Costs:	<u>\$50,488.00</u>
4. Equipment Costs:	<u>\$291.80</u>
5. Field Purchases and Other Costs:	<u>\$7,800.00</u>
6. Handling Charges:	<u>\$1,299.22</u>
<b>TOTAL PROPOSED BUDGET =</b>	<b><u>\$60,241.81</u></b>



metals prep	samples X	\$17.45	per sample =	\$0.00
total arsenic	samples X	\$17.45	per sample =	\$0.00
total barium	samples X	\$10.90	per sample =	\$0.00
total cadmium	samples X	\$17.45	per sample =	\$0.00
total chromium	samples X	\$10.90	per sample =	\$0.00
total Lead	samples X	\$17.45	per sample =	\$0.00
total mercury	samples X	\$10.90	per sample =	\$0.00
total selenium	samples X	\$17.45	per sample =	\$0.00
total silver	samples X	\$10.90	per sample =	\$0.00
Lab and/or Field Blank	samples X		per sample =	\$0.00
microbial plate count	samples X	\$100.00	per sample =	\$0.00
	samples X		per sample =	\$0.00
	samples X		per sample =	\$0.00
	samples X		per sample =	\$0.00

3. Groundwater Analysis Costs - This must be for laboratory analysis only.

2	BTEX	samples X	\$91.90	per sample =	\$183.80
	TPHg	samples X	\$133.04	per sample =	\$0.00
	COD	samples X	\$32.71	per sample =	\$0.00
	pH	samples X	\$15.27	per sample =	\$0.00
	nitrogen	samples X	100	per sample =	\$0.00
	phosphorus	samples X	100	per sample =	\$0.00
	Total Plate Count	samples X	\$100.00	per sample =	\$0.00
	total cadmium	samples X	19.63	per sample =	\$0.00
	total iron	samples X	\$13.09	per sample =	\$0.00
	total chromium	samples X	13.09	per sample =	\$0.00
	total zinc	samples X	\$37.80	per sample =	\$0.00
	total mercury	samples X	28.35	per sample =	\$0.00
	total lead	samples X	\$19.63	per sample =	\$0.00
	total selenium	samples X	\$16.36	per sample =	\$0.00
	total arsenic	samples X	\$19.63	per sample =	\$0.00
	total silver	samples X	\$13.09	per sample =	\$0.00
	total barium	samples X	\$13.09	per sample =	\$0.00

Total Analysis Costs = \$362.79

**G. PERSONNEL**

All personnel costs that are not included elsewhere in the budget/billing form must be listed here. Costs must be listed per task, not personnel type. The following are some examples of tasks: Drafting, data collection, plan, report or budget preparation for \_\_\_\_\_ (i.e., site classification work plan, 45 day report, or high priority corrective action budget), sampling, field oversight for \_\_\_\_\_ (i.e. drilling/well installation, corrective action, or early action), or maintenance of \_\_\_\_\_. The above list is not inclusive of all possible tasks.

**Thomas Clark, PE**  
 Sr. Professional Engineer (PG) \_\_\_\_\_ : 10 hours x \$125.00 per hour = \$1,250.00

Task to be performed for the above hours: Review and Certify CACR

**Andrew Fetterolf**  
 Project Manager \_\_\_\_\_ : 20 hours x \$78.00 per hour = \$1,560.00

Task to be performed for the above hours: groundwater sampling, planning, sample prep

**Todd Birky**  
 Sr. Project Manager \_\_\_\_\_ : 205 hours x \$98.00 per hour = \$20,090.00

Task to be performed for the above hours: Corrective Action implementation

**Allan Green**  
 Sr. Project Manager \_\_\_\_\_ : 40 hours x \$98.00 per hour = \$3,920.00

Task to be performed for the above hours: Planning, CAP & Budget amendment

**Todd Birky**  
 Project Manager \_\_\_\_\_ : 100 hours x \$98.00 per hour = \$9,800.00

Task to be performed for the above hours: CAP Preparation; design, research

**Gaye Lynn Green**  
 Sr. Acct. Technician \_\_\_\_\_ : 16 hours x \$55.00 per hour = \$880.00

Task to be performed for the above hours: Reimbursement forms and documentation

**Gaye Lynn Green**  
 Sr. Admin. Assist. \_\_\_\_\_ : 24 hours x \$42.00 per hour = \$1,008.00

Task to be performed for the above hours: Report/Reimbursement review, copy, bind and mail

**Todd Birky**  
 Project Manager \_\_\_\_\_ : 50 hours x \$98.00 per hour = \$4,900.00

Task to be performed for the above hours: Water Permitting; IEPA Water Correspondence

**Penny Siltzer**  
 Sr. Geologist, PG \_\_\_\_\_ : 12 hours x \$100.00 per hour = \$1,200.00

Task to be performed for the above hours: review and certify reimbursement, CAP & Budgets

**Penny Siltzer**  
 Sr. Project Manager \_\_\_\_\_ : 60 hours x \$98.00 per hour = \$5,880.00

Task to be performed for the above hours: HAA, ELUC, Village Ordinance, perform TACO calculations, slug test analysis

TOTAL = \$50,488.00







Other Costs - A listing and description of all other costs which will be/were incurred and are not specifically listed on this form should be attached. The listing should include a cost breakdown in a time and materials format.

Air permit and renewal	\$400.00
Water Permit	\$6,000.00
Repair of blower by IOEM	\$1,400.00

Total Other Costs =	<u>\$7,800.00</u>
Subtotal I-1 =	<u>\$0.00</u>
Total pages I-1 and I-2:	<u>\$7,800.00</u>





**M. JUSTIFICATION FOR BUDGET AMENDMENTS**

If this form is being submitted for an amendment, you must submit a narrative justifying the need for the amendment. If the amendment includes a revision in a corrective action proposal, a new proposal must be submitted.

Please see narrative attached Corrective Action Plan.

Illinois Environmental Protection Agency

Owner/Operator and Professional Engineer Budget Certification Form for Leaking Underground Storage Tanks Sites

In accordance with 415 ILCS 5/57, if an owner or operator intends to seek payment from the UST Fund, an owner or operator must submit to the Agency, for the Agency's approval or modification, a budget which includes an accounting of all costs associated with the implementation of the investigative, monitoring and/or corrective action plans.

I hereby certify that I intend to seek payment from the UST Fund for performing High Priority Corrective Action activities at Warsaw, Howard

LUST site. I further certify that the costs set forth in this budget are 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 and no costs are included in this budget which are not described in the corrective action plan. I further certify that costs ineligible for payment from the Fund pursuant to 35 Illinois Administrative Code Section 732.606 are not included in the budget proposal or amendment. Such ineligible costs include but are not limited to:

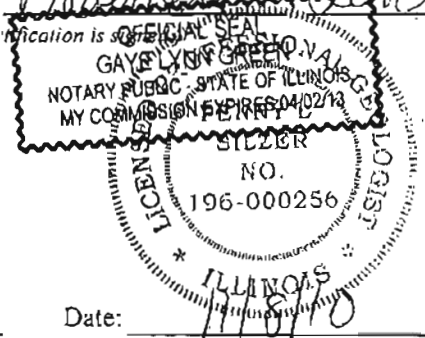
- Costs associated with ineligible tanks.
Costs associated with site restoration (e.g., pump islands, canopies).
Costs associated with utility replacement (e.g., sewers, electrical, telephone, etc.).
Costs incurred prior to TEMA notification.
Costs associated with planned tank pulls.
Legal defense costs.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

Owner/Operator: John Warsaw Title: Owner

Signature: [Signature] Date: 11/13/10

Subscribed and sworn to before me the 13th day of November 2010

(Budget Proposals and Budget Amendments must be notarized when the certification is signed)
Seal: [Signature] (Notary Public)

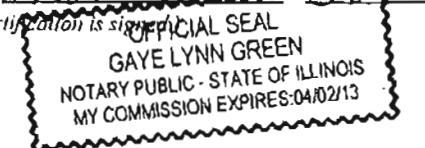


P.E./PG: Penny Silzer Seal:

P.E./PG Signature: [Signature] Date: 11/13/10

Subscribed and sworn to before me the 8th day of November 2010

(Budget Proposals and Budget Amendments must be notarized when the certification is signed)
Seal: [Signature] (Notary Public)



The Agency 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. This form has been approved by the Forms Management Center.



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829  
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217/782-6762

CERTIFIED MAIL

MAR 18 2011

7009 3410 0002 3807 9759

Howard Warsaw  
Rt. 122  
Minier, Illinois 61759

Re: LPC #1790455007 -- Tazewell County  
Minier/Warsaw, Howard  
WarsawItco/Rt.122  
Leaking UST Incident No. 981987  
Leaking UST Technical File

Dear Mr. Warsaw:

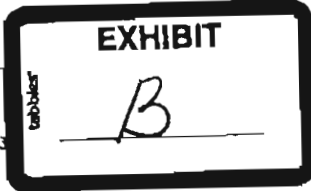
The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the Amended Corrective Action Plan (plan) submitted for the above-referenced incident. This plan, dated November 8, 2010, was received by the Illinois EPA on November 19, 2010. Citations in this letter are from the Environmental Protection Act (Act), as amended by Public Act 92-0554 on June 24, 2002, and Public Act 96-0908 on June 8, 2010, and 35 Illinois Administrative Code (35 Ill. Adm. Code).

Pursuant to 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 plan is approved. The activities proposed in the plan are appropriate to demonstrate compliance with Title XVI of the Act. Please note that all activities associated with the remediation of this release proposed in the plan must be executed in accordance with all applicable regulatory and statutory requirements, including compliance with the proper permits.

In addition, the budget is modified pursuant to Sections 57.7(b)(3) and 57.7(c) of the Act and 35 Ill. Adm. Code 734.505(b) and 734.510(b). Based on the modifications listed in Section 2 of Attachment A, the amounts listed in Section 1 of Attachment A have been approved. Please note that the costs must be incurred in accordance with the approved plan. Be aware that the amount of payment from the Fund may be limited by Sections 57.7(c), 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.

If the owner or operator agrees with the Illinois EPA's modifications, submittal of an amended plan and/or budget, if applicable, is not required (Section 57.7(c) of the Act).

Pursuant to Sections 57.7(b)(5) and 57.12(c) and (d) of the Act and 35 Ill. Adm. Code 734.100 and 734.125, the Illinois EPA requires that a Corrective Action Completion Report that achieves compliance with applicable remediation objectives be submitted within 30 days after completion of the plan to:





Page 2

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

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

If within four years after the approval of this plan, compliance with the applicable remediation objectives has not been achieved and a Corrective Action Completion Report has not been submitted; the Illinois EPA requires the submission of a status report pursuant to Section 57.7(b)(6) of the Act.

Please be advised that, pursuant to Public Act 96-0908, effective June 8, 2010, all releases of petroleum from USTs are subject to Title XVI of the Act, as amended by Public Act 92-0554 on June 24, 2002, and Public Act 96-0908 on June 8, 2010, and 35 Ill. Adm. Code 734. The regulations at 35 Ill. Adm. Code 732 no longer exist, and the only releases subject to 35 Ill. Adm. Code 731 are those from hazardous substance USTs.

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 Jim Ransdell at 217/557-6938.

Sincerely,

  
Thomas A. Henninger

Unit Manager  
Leaking Underground Storage Tank Section  
Division of Remediation Management  
Bureau of Land

TAH:JSR

Attachment: Attachment A

c: Midwest Environmental Consulting & Remediation Services, Inc.  
BOL File

## Attachment A

Re: LPC # 1790455007 -- Tazewell County  
 Minier/Warsaw, Howard  
 Warsaw Itco/Rt. 122  
 Leaking UST Incident No. 981987  
 Leaking UST Technical File

**SECTION 1**

As a result of the Illinois EPA's modification(s) in Section 2 of this attachment, the following amounts are approved:

\$0.00	Investigation Costs
\$401.36	Analysis Costs
\$15,698.00	Personnel Costs
\$291.80	Equipment Costs
\$0.00	Field Purchases and Other Costs

Handling charges will be determined at the time a billing package is reviewed by the Illinois EPA. The amount of allowable handling charges will be determined in accordance with Section 57.8(f) of the Environmental Protection Act (Act) and 35 Illinois Administrative Code (35 Ill. Adm. Code) 732.607.

**SECTION 2**

1. \$34,790.00 deduction in Personnel Costs for costs for corrective action implementation, CAP preparation, design, and research, and permitting costs associated with enhanced bioremediation and a groundwater treatment system

\$7,800.00 deduction in Field Purchases and Other Costs for Bureau of Water and Bureau of Air permitting and repair of equipment.

These costs are not consistent with materials, activities, and services associated with an Illinois EPA-approved 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).

The plan at-hand, which is approved, does not propose corrective action activities involving enhanced bioremediation and/or a groundwater treatment system.

A Moisture Content sample and a Soil Bulk Density sample has been approved, costs are added to Analytical Costs to complete Section 734.410 (Remediation Objectives).

TAH:JSR

### Appeal Rights

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

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

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

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

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