BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

SHREE KRUBER, INC., Petitioner,	)	
v.	)	PCB 2021-003. 2021-005
	)	(LUST Appeal)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, Respondent.	)	(consolidated)

NOTICE

Don Brown, Clerk
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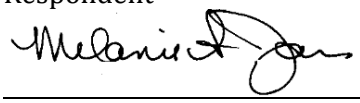
PLEASE TAKE NOTICE that I have today filed with the office of the Clerk of the Pollution Control Board **ILLINOIS EPA'S RESPONSE TO PETITIONER'S MOTION OF SUMMARY JUDGMENT,** copies of which are herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,
Respondent



Melanie A. Jarvis
Assistant Counsel
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1021 North Grand Avenue, East
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Springfield, Illinois 62794-9276
217/782-5544
217/782-9143 (TDD)
Dated: July 29, 2021

BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

SHREE KRUBER, INC., Petitioner,	)	
v.	)	PCB 2021-003, 2021-005
	)	(LUST Appeal)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, Respondent.	)	(consolidated)

ILLINOIS EPA'S CROSS MOTION FOR SUMMARY JUDGMENT OR IN THE ALTERNATIVE RESPONSE TO PETITIONER'S MOTION OF SUMMARY JUDGMENT

NOW COMES the Respondent, the Illinois Environmental Protection Agency ("Illinois EPA" or "Agency"), by one of its attorneys, Melanie A. Jarvis, Assistant Counsel and Special Assistant Attorney General, and hereby, as an alternative to its Motion to Dismiss and in an effort to expedite the review of the case, submits **ILLINOIS EPA'S RESPONSE TO PETITIONER'S MOTION OF SUMMARY JUDGMENT** to the Illinois Pollution Control Board ("Board").

I. STANDARD FOR ISSUANCE AND REVIEW

A motion for summary judgment should be granted where the pleadings, depositions, admissions on file, and affidavits disclose no genuine issue as to any material fact and the moving party is entitled to judgment as a matter of law. Dowd & Dowd, Ltd. v. Gleason, 181 Ill.2d 460, 483, 693 N.E.2d 358, 370 (1998); McDonald's Corporation v. Illinois Environmental Protection Agency, PCB 04-14 (January 22, 2004), p. 2.

Section 57.8(i) of the Illinois Environmental Protection Act ("Act") (415 ILCS 5/57.8(i)) grants an individual the right to appeal a determination of the Illinois EPA to the Board pursuant to Section 40 of the Act (415 ILCS 5/40). Section 40 of the Act, the general appeal section for permits, has been used by the legislature as the basis for this type of appeal to the Board. Thus,

when reviewing an Illinois EPA determination of ineligibility for reimbursement from the Underground Storage Tank Fund, the Board must decide whether the application, as submitted, demonstrates compliance with the Act and Board regulations. Rantoul Township High School District No. 193 v. Illinois EPA, PCB 03-42 (April 17, 2003), p. 3.

In deciding whether the Illinois EPA's decision under appeal here was appropriate, the Board must look to the documents within the Administrative Record ("Record" or "AR").

II. BURDEN OF PROOF

Pursuant to Section 105.112(a) of the Board's procedural rules (35 Ill. Adm. Code 105.112(a)), the burden of proof shall be on the petitioner. In reimbursement appeals, the burden is on the applicant for reimbursement to demonstrate that incurred costs are related to corrective action, properly accounted for, and reasonable. Rezmar Corporation v. Illinois EPA, PCB 02-91 (April 17, 2003), p. 9.

III. ISSUE

The issue presented is whether the 2020 release Petitioner reported is a rereporting of the 2008 release at the same site?

Based upon the express language of the Act and regulations thereunder, and the facts presented, the answer is YES, it is a rereporting of the 2008 release.

IV. FACTS

There exists a genuine issue of material fact. As a little background, Tank 1 had a reported release in 2008. At that time, Tank 1, a diesel tank, was removed and tanks 2, 3, 4 and 5, all gasoline tanks, were abandoned in place. Tank 6, a diesel tank was reported as not having a release and was kept in service. (A.R. 0029).

The site is currently described as an active convenience store undergoing property redevelopment. (A.R. 0184). A subsurface investigation indicating hydrocarbon impacted soil was undertaken sometime in late 2019 or early 2020 (no date given by the Petitioner in its filings), around Tank 6 which was last in use on December 19, 2018. (A.R. 0280). A release was reported from Tank 6 on January 3, 2020. (A.R. 0184). The release was reported as an overfill and not as an actual release from the tank system. (A.R. 0275). The tank was removed on January 21, 2020. (A.R. 0189).

The Illinois EPA contests the following factual assertions within the Petitioner's Motion:

1. On page 3 of their motion, the Petitioner mentions that Pyrene was not detected in 2008 in samples around Tank 1 and Tank 6; however, they did not mention that Pyrene was detected in 2008 in samples from MW-1 and MW-3 which were located far away from Tank 1 and Tank 6 which are diesel tanks. (A.R. 0083, 0084 and 0098). Therefore, it is Illinois EPA's assertion that Pyrene cannot be used as a basis to justify new release since it may be associated with background contamination. Further, Pyrene was detected in 2017 in samples from B-3 and B-6, which were located near MW-1 and MW-3. MW-1, MW-3, B-3, and B-6 were collected south or west of the gasoline operations portion of the site and away from the diesel fuel operations portion of the site. (See attached)[1]. The concentrations of Pyrene in 2008 in samples from MW-1 were greater than the concentrations of Pyrene in 2020 in samples CS-1, CS-2, CS-7, and CS-11. The

[1] This attachment is from the Agency's records. It was submitted by the Petitioner to the Agency. The information contained therein is information collected and known to the Petitioner. Therefore, no prejudice will occur if the Board considers this attachment when ruling on this motion. Further, the Agency only proffers this attachment in response to inaccurate factual statements in Petitioner's motion. For the Board's convenience, Attachment 1 is the pages specifically referenced in this Response and Attachment 2 is the full document as filed with the Agency.

concentrations of Pyrene in 2017 in samples from B-6 were greater than the concentrations of Pyrene in 2020 in samples CS-1, CS-7, and CS-11. The greatest concentrations of Pyrene in 2020 were in samples CS-2 and CS-3, which were collected beneath the piping/pump islands that were jointly served by Tanks 1 and 6. It is noted that no samples were collected close to this piping or these pump islands during investigation of the 2008 incident. (A.R. 0025).

2. On page 3, the Petitioner also said sampling for 2008 incident confirmed that there had been a release from Tank 1 but no release from Tank 6 prior to 2008 incident sampling events. However, no samples were collected close to Tank 6 in 2008 and therefore, that statement is unsubstantiated. (A.R. 0025). Incident 20080255 was reported when Tank 1 was removed and Tanks 2 through 5 were abandoned. Tank 6 remained in service and there was no open excavation surrounding Tank 6 at that time; therefore, the OSFM did not inspect Tank 6.

3. Next, on Page 4 of their motion, the Petitioner said that Tank 6 was not within the contamination plume as shown on Figures 4 and 6. (A.R. 0098 and A.R. 0102 respectively). The concentrations below Tier 1 objectives are typically used to define the plume boundaries. As shown on Figures 4 and 6, the plume boundary arbitrarily excluded Tank 6 when the nearest clean sample was MW-9. The Petitioner argues that the Illinois EPA accepted the soil contamination plume as shown on Figures 4 and 6 because the Illinois EPA approved the CAP(s) in which the figures were included. However, this is not entirely true. Figures 4 and 6 show the soil contamination plume was defined; however, the northeast soil contamination plume boundary was not properly shown. In every direction

except northeast (the direction of Tank 6), the soil contamination plume boundaries were based on concentrations below Tier 1 objectives. The northeast soil contamination plume boundary conveniently stopped short of Tank 6 even though no samples were collected close to Tank 6, and the nearest clean sample was MW-9, which was northeast of Tank 6. Therefore, Tank 6, based upon the technical data submitted at the time, was included in the plume, even if it was not shown on a map. Note: MW-9 (nearest clean well to tank 6) shows that toluene has a detection of 9.06 ppb in 2008, compared to non-detect in 2020. Further the piping for Tanks 1 and 6 where samples CS1, CS2 and CS3 were taken was included in the plume for the 2008 incident. (See A.R. 0098 and A.R. 0102).

4. The Petitioner, on Page 13 of their motion, said the level of Ethylbenzene in 2020 in the canopy area had a maximum concentration of 194 ppb at CS-3, triple the amount of any of the 2008 samples, which is not a true statement. The concentrations of Ethylbenzene in 2008 Early Action samples from the North Wall and the East Wall samples of Tank 1 were 1.5 to 12.8 times greater than 194 ppb. (A.R. 0031-0033). These sample locations were not included on the attached figures and tables and therefore not included in the comparison. Tank 1 was located immediately adjacent to and west of the canopy area. (A.R. 0019). It is noted that the east wall of the 2008 excavation for Tank 1 would have been very close to CS-3, which was collected in 2020. (A.R. 0019 and 0193) It is also noted that the only ethylbenzene detected in 2020 was detected in samples CS-1, CS-2, and CS-3, which were collected beneath the piping and pump islands that were jointly served by Tanks 1 and 6. (A.R. 0193) It is further noted that no samples

were collected close to this piping or these pump islands during investigation of the 2008 incident. (A.R. 0025)

The Agency's analysis of the site and its determination of the 2020 report being a rereporting of the 2008 release can be found in the Administrative Record starting at page 279 through page 312.

This case was appealed to the Board on November 4, 2020, consolidated on April 1. 2021 and Petitioner's Motion for Summary Judgement was filed on July 15, 2021.

V. ARGUMENT

There exists a genuine issue of material fact. As stated above, the Illinois EPA contests basic facts set forth in Petitioner's motion. Petitioner argues that they followed the regulations in order to confirm a release occurred. The Agency does not contest that a release occurred. It just occurred in 2008 and not in 2020. When a release is called into the Illinois Emergency Management Agency ("IEMA"), several steps need to be taken under the Act and regulations. These steps need to be taken whether the release that was called in was actually a release or not. Those steps are taken to confirm the release. The Office of State Fire Marshall ("OSFM") deems tanks eligible for reimbursement from the Leaking Underground Storage Tank Fund ("Fund"), but does not confirm releases, nor do they determine if the release is a rereporting of a prior release. That task is left up to the Agency after the 20-day and 45-day reports are submitted. It is at this point that enough information has been collected to determine if the newly reported release is the same or different from the prior reported release. In this case, after the 45-day report was submitted, the information contained within that report made it clear that the 2020 reported release was the same as the 2008 release and that the 2020 reported release was

merely a rereporting of that 2008 release. The conclusion the Agency reach when looking at all the evidence is that there was one release at the site from Tank 1 in 2008.

Petitioner argues that OSFM only determined that Tanks 1 through 5 were eligible for reimbursement in 2008 and did not include Tank 6. That is true. OSFM also did not include newly installed Tanks 7 or 8 at that time either. However, OSFM makes those determinations based upon information from the tank owner and operator which must not have requested that Tank 6 be determined to be eligible at that time. Further, during the 2008 release, the Petitioner never investigated towards the pump island used by Tank 1 and Tank 6 or in the direction of Tank 6, so there would not have been any information available to make such determination. During late 2019 or early 2020, Petitioner did a subsurface investigation of the site. The purpose of that investigation is not given in their 45-day report. Nor are the results provided, however, Petitioner states that they found hydrocarbons, which would not be unusual at a gas station with a prior release where it had been remediated to Tier II standards. It then applied for and was given a permit to remove Tank 6. (A.R. 0201). It should be noted that Tanks 7 and 8 were not investigated as sources of the leak. One could opine that the subsurface investigation was done solely in order to call in a release in order to have the planned tank pull qualify for reimbursement under the Fund.

When the tank was pulled there was staining on the walls and odor from the open excavation.[2] Just to be clear, the fuel dispensers and piping were not removed during the 2008 incident and no samples were taken in that area. Tank 1 was located very close to the fuel dispensing area. The samples taken from C-1, C-2 and C-3 in 2020 which were the samples that

[2] It should be noted that OSFM will require the reporting of a release regardless of whether an open or closed release has previously been reported at the site if they see any sign of contamination. OSFM does not make determinations of whether a release is a new release or a rereporting of a release. They only determine that some type of release has occurred and that it needs to be reported to IEMA.

showed contaminants, could have been and most likely were from the release from Tank 1 that were never remediated in 2008. Those samples are the main source of Petitioner's belief a new release has occurred, however, the proximity of Tank 1 to that area and the lack of sampling data from 2008 makes it unlikely that it is a new release and is merely a rereporting of the release in 2008.

Next, Petitioner uses the constituent Pyrene to bolster their claim that a new release occurred. As stated above, the Petitioner mentions that Pyrene was not detected in 2008 in samples around Tank 1 and Tank 6; however, they did not mention that Pyrene was detected in 2008 in samples from MW-1 and MW-3 which were located far away from Tank 1 and Tank 6 which are diesel tanks. (A.R. 0083, 0084 and 0098). Therefore, it is Illinois EPA's assertion that Pyrene cannot be used as a basis to justify new release since it may be associated with background contamination. Further, Pyrene was detected in 2017 in samples from B-3 and B-6, which were located near MW-1 and MW-3. MW-1, MW-3, B-3, and B-6 were collected south or west of the gasoline operations portion of the site and away from the diesel fuel operations portion of the site. The concentrations of Pyrene in 2008 in samples from MW-1 were greater than the concentrations of Pyrene in 2020 in samples CS-1, CS-2, CS-7, and CS-11. The concentrations of Pyrene in 2017 in samples from B-6 were greater than the concentrations of Pyrene in 2020 in samples CS-1, CS-7, and CS-11. The greatest concentrations of Pyrene in 2020 were in samples CS-2 and CS-3, which were collected beneath the piping/pump islands that were jointly served by Tanks 1 and 6. Once again, it is very important to note that no samples were collected close to this piping or these pump islands during investigation of the 2008 incident. (A.R. 0025).

The Petitioner attempts to distinguish the Board's decision in Weeke Oil Company v. IEPA, (May 20, 2010), PCB 2010-0001 from the facts in this case by stating that Weeke involved a site with a previous incident that had a no further remediation letter ("NFR") issued and this site's previous incident is still open. While the issuance of an NFR was one aspect of the Weeke decision in determining if reimbursement was possible at the site, it did not factor on whether or not the new incident was a rereporting of the initial incident. The Board held in Weeke, while affirming the Illinois EPA's decision, that Weeke failed to establish that a new release had occurred at the site. If a new release had occurred, whether the initial release was open or closed by the issuance of an NFR would have been irrelevant at that point in time. Weeke established that the Agency has the authority to make decisions on whether an incident is a rereporting of a prior release. Here the Agency has made such a determination. Based upon all of the evidence in the Administrative Record it is clear that the Illinois EPA made the correct decision in determining that the 2020 incident at the Petitioner's site is a rereporting of the 2008 release.

VII. CONCLUSION

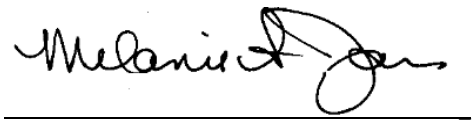
While the Illinois EPA and the Petitioner disagree on the material facts in this case, the record in the case and the law are clear and in favor of the Illinois EPA. The Petitioner did not meet its burden of proof and establish that the 2020 release it reported was not a rereporting of the 2008 incident. In fact, the facts set forth in the record indicate just the opposite.

WHEREFORE: for the above noted reasons, the Illinois EPA respectfully requests the Board **DENY** Petitioner's Motion for Summary Judgment and set the matter for hearing.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,

Respondent



Melanie A. Jarvis
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P.O. Box 19276
Springfield, Illinois 62794-9276
217/782-5544, 217/782-9143 (TDD)
Dated: July 29, 2021

This filing submitted on recycled paper.

CERTIFICATE OF SERVICE

I, the undersigned attorney at law, hereby certify that on **July 29, 2021**, I served true and correct copies of **ILLINOIS EPA'S RESPONSE TO PETITIONER'S MOTION OF SUMMARY JUDGMENT** via the Board's COOL system and email, upon the following named persons:

Don Brown, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, IL 60601
don.brown@illinois.gov

Carol Webb, Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
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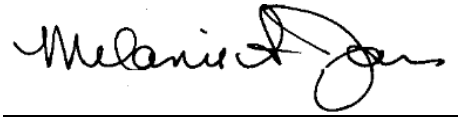
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,
Respondent



Melanie A. Jarvis
Assistant Counsel
Division of Legal Counsel
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P.O. Box 19276
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217/782-5544
217/782-9143 (TDD)

TABLE 1.
SOIL ANALYTICAL RESULTS
Freedom Oil Company
Champaign, IL

Analytes/ Sample ID: SAMPLE DATE	Tier I Soil Remediation Obj.	MW-9 3' 03/24/11	MW-9 7' 03/24/11	B-3 3' 10/24/17	B-3 8' 10/24/17	B-4 3' 10/24/17	B-4 8' 10/24/17	B-5 3' 10/24/17
MTBE	320	<MDL	<MDL	<26	<25	<27	<26	<27
Benzene	30	<MDL	<MDL	<26	290	190	160	230
Toluene	12,000	<MDL	9.06	<26	<25	59	<26	<27
Ethylbenzene	13,000	<MDL	<MDL	<26	1,300	250	95	260
Total Xylenes	5,600	<MDL	<MDL	230	95	550	<79	400
PNAs								
Acenapthene	570,000	<MDL	<MDL	<85	<83	<88	<86	<88
Acenapthylene	XX	<MDL	<MDL	<85	<83	<88	<86	<88
Anthracene	12,000,000	<MDL	<MDL	<85	<83	<88	<86	<88
Benzo (a) Anthracene	2,000	<MDL	<MDL	14	<8.3	<8.8	<8.6	<8.8
Benzo (a) Pyrene	800	<MDL	<MDL	<8.5	<8.3	<8.8	<8.6	<8.8
Benzo (b) Fluoranthene	5,000	<MDL	<MDL	13	<8.3	<8.8	<8.6	<8.8
Benzo (g,h,i) Perylene	XX	<MDL	<MDL	40	<8.3	<8.8	<8.6	<8.8
Benzo (k) Fluoranthene	49,000	<MDL	<MDL	8.5	<4.2	<4.5	<4.4	<4.4
Chrysene	160,000	<MDL	<MDL	32	<8.3	<8.8	<8.6	<8.8
Dibenzo (a,h) Anthracene	800	<MDL	<MDL	<8.5	<8.3	<8.8	<8.6	<8.8
Fluoranthene	4,300,000	<MDL	<MDL	30	<8.3	<8.8	<8.6	15
Fluorene	560,000	<MDL	<MDL	<85	<83	<88	<86	<88
Ideno (1,2,3-cd) Pyrene	8,000	<MDL	<MDL	<8.5	<8.3	<8.8	<8.6	<8.8
Naphthalene	1,800	<MDL	<MDL	350	350	<88	160	300
Phenanthrene	XX	<MDL	<MDL	<85	<83	<88	<86	<88
Pyrene	4,200,000	<MDL	<MDL	23	<8.3	<8.8	<8.6	<8.8

Attachment 1

TABLE 1.
SOIL ANALYTICAL RESULTS
Freedom Oil Company
Champaign, IL

Analytes/ Sample ID: SAMPLE DATE	Tier I Soil Remediation Obj.	B-5 7' 10/24/17	B-6 4' 10/24/17	B-6 7' 10/24/17				
MTBE	320	<27	31	<29				
Benzene	30	410	1,300	420				
Toluene	12,000	<27	670	230				
Ethylbenzene	13,000	250	1,200	340				
Total Xylenes	5,600	170	5,600	1,900				
PNAs								
Acenapthene	570,000	<86	280	<90				
Acenapthylene	XX	<86	<90	<90				
Anthracene	12,000,000	<86	440	180				
Benzo (a) Anthracene	2,000	<8.6	23	140				
Benzo (a) Pyrene	800	<8.6	210	<9.0				
Benzo (b) Fluoranthene	5,000	<8.6	330	150				
Benzo (g,h,i) Perylene	XX	<8.6	220	170				
Benzo (k) Fluoranthene	49,000	<4.3	96	56				
Chrysene	160,000	<8.6	380	230				
Dibenzo (a,h) Anthracene	800	<8.6	<9.0	19				
Fluoranthene	4,300,000	<8.6	640	270				
Fluorene	560,000	<86	<90	<90				
Ideno (1,2,3-cd) Pyrene	8,000	<8.6	130	77				
Naphthalene	1,800	180	150	160				
Phenanthrene	XX	<86	720	480				
Pyrene	4,200,000	<8.6	520	220				

ALL RESULTS REPORTED IN PARTS PER BILLION (ug/kg, ug/L)
XX = Tier 1 soil remediation objective not listed in TACO tables.
NA = not analyzed
M = Matrix interferences identified

TACO Parameters

Sample #	foc	pH	Bulk Density,	Particle Density	% Moisture	Porosity
Surface	2.90%	7.40	1.26	2.52	42.8%	0.50
Subsurface	0.87%	7.77	1.50	2.64	27.8%	0.43

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
E-mail : mdwstenv@frontier.com

0190105433 – Champaign County
Freedom Oil Company
Incident # 20080255
Leaking UST Technical File

March 12, 2018

Illinois Environmental Protection Agency
Bureau of Land -- #24/LUST Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
attn: Mr. Dave Myers

Re: LPC #0190105433 – Champaign County
Freedom Oil Company
1406 North Prospect
Champaign, Illinois 61820
Incident #20080255
LUST Technical File

Dear Mr. Myers:

Please find attached the amended Corrective Action Plan (CAP) and Budget for the above referenced site.

If you have any questions or comments feel free to contact my office.

Sincerely,

Midwest Environmental Consulting & Remediation Services, Inc.

Allan Green
President

AJF
Job No. 08-24
cc: Mr. Mark Eckhoff

Attachment 2

LEAKING UNDERGROUND STORAGE TANK

Corrective Action Work Plan

Subject Site:

Freedom Oil Company
1406 North Prospect
Champaign, Illinois 61820
Incident #20080255
LPC #0190105433 – Champaign County

Prepared for:

Freedom Oil Company
814 West Chestnut Street
Bloomington, Illinois 61701
(309) 828-7750
Contact: Mr. Mark Eckhoff

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
Leaking Underground Storage Tank Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

TABLE OF CONTENTS

CORRECTIVE ACTION WORK PLAN

IEPA CORRECTION ACTION PLAN FORM

Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

The Agency is authorized to require this information under Section 4 and Title XVI of the Environmental Protection Act (415 ILCS 5/4, 5/57 – 57.17). Failure to disclose this information may result in a civil penalty of not to exceed $50,000.00 for the violation and an additional civil penalty of not to exceed $10,000.00 for each day during which the violation continues (415 ILCS 5/42). Any person who knowingly makes a false material statement or representation, orally or in writing, in any label, manifest, record, report, permit, or license, or other document filed, maintained or used for the purpose of compliance with Title XVI commits a Class 4 felony. Any second or subsequent offense after conviction hereunder is a Class 3 felony (415 ILCS 5/44 and 57.17). This form has been approved by the Forms Management Center.

Leaking Underground Storage Tank Program
Corrective Action Plan

A. Site Identification

IEMA Incident # (6- or 8-digit): 20080255 IEPA LPC# (10-digit): 0910105433

Site Name: Freedom Oil Company

Site Address (Not a P.O. Box): 1406 North Prospect

City: Champaign County: Champaign ZIP Code: 61820

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 and diesel fuel
5. This Corrective Action Plan is submitted pursuant to:
   - ○ a. 35 Ill. Adm. Code 731.166
   - ○ b. 35 Ill. Adm. Code 732.404
   - ⊘ c. 35 Ill. Adm. Code 734.335

C. Proposed Methods of Remediation

1. Soil excavation
2. Groundwater groundwater ordinance

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; and
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.

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 Freedom Oil Company
Contact Mr. Mark Eckhoff
Address 814 West Chestnut
City Bloomington
State Illinois
Zip Code 61701
Phone (309) 828-7750

Signature
Date 3-9-18

Consultant

Company M.E.C.R.S., Inc.
Contact Mr. Allan Green
Address 22200 IL Route 9, P.O. Box 614
City Tremont
State Illinois
Zip Code 61568
Phone (309) 925-5551
Email mdwstenv@frontier.com

Signature
Date 3/12/18

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

Name Penny Silzer
Company M.E.C.R.S., Inc.
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 Mar 31, 2019

Signature
Date 3/19/18

L.P.E. or L.P.G. Seal

LICENSED PROFESSIONAL GEOLOGIST
PENNY L SILZER
NO. 196-000256
ILLINOIS

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MAR 21 2018
IEPA/BOL

Corrective Action Plan

Section E. Technical Information – Corrective Action Plan

As proposed in the CAP and Budget dated July 8, 2013, this amended CAP and budget is being submitted to address off-site soil contamination to the south of the site to Tier 1 cleanup objectives. At the request of the off-site property owner, Mr. George Chin, an excavation will be completed to eliminate all contaminated soils. Groundwater quality will be monitored following excavation activities to determine the need for additional corrective action, institutional controls, and/or engineered barriers. A TACO analysis will be completed based on the results of the excavation soil samples and post excavation groundwater data. The TACO results may indicate the need for additional corrective action to address off-site contamination such as engineered barriers and/or institutional controls including a Highway Authority Agreement with the city of Champaign for Prospect Avenue to the west.

1. **Executive summary identifying the objectives of the corrective action plan and the technical approach to be utilized to meet such objectives.**

A Site Investigation was conducted and completed as reported in the Site Investigation Completion Report dated 7/11/11. As part of the Corrective Action activities, a Tiered Approach to Cleanup Objectives (TACO) evaluation of the site was conducted. Details of the TACO evaluation can be found in the Corrective Action Plan dated July 8, 2013.

As part of the most recent corrective action activities, MECRS completed four soil borings as shown in Figure 3. One of the borings was completed in the vicinity of MW-3 near the western property boundary to obtain updated soil data to determine if further on-site excavation would be necessary. Contamination of total xylenes above soil saturation limits at approximately 7 feet below ground surface (bgs) was previously observed during site investigation activities. Three of the soil borings were in the immediate vicinity of MW-1 at the southern property boundary to determine the extent of contaminant migration to the off-site property to the south. The borings were completed by Reynolds Drilling, under the supervision of MECRS, on October 24, 2017 using Geoprobe technology with disposable acetate liners. The borings were sampled continuously and no samples were collected below the water levels as measured in the on-site groundwater monitoring wells. All samples were field screened with a portable PID. The intervals with the highest PID readings were placed in laboratory certified jars and sent, under chain of custody, to PDC Laboratories in Peoria, Illinois and analyzed for BTEX, MTBE, and PNAs. The updated sample from the vicinity of MW-3 showed that levels of contamination in this area are above Tier 1 CUOs but below previously calculated and submitted Tier 2 CUOs. It is our belief that the elimination of the contaminant source material had a significant effect on contaminant concentrations in that area. The potential excavation in that area will no longer be necessary and the existing on-site contamination in soil and groundwater will be addressed with institutional and engineering controls. Contamination above Tier 1 CUOs was observed in all three borings in the vicinity of MW-1. The owner of the off-site property to the south, Mr. George Chin, has requested that his property be cleaned up to the fullest extent possible with an excavation of all accessible contaminated soils.

Site maps are included in Figures 1 through 6. A budget for the proposed scope of work for this phase of corrective action is provided in Appendix D.

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

The materials released at the site were gasoline and diesel fuel. The indicator contaminants for gasoline and diesel fuel are benzene, toluene, ethylbenzene, and xylenes (BTEX), methyl tert-butyl ether (MTBE), and poly-nuclear aromatics (PNAs). For a complete discussion of the Tier 2 remediation objectives for the site please refer to the Corrective Action Plan dated July 8, 2013. The remediation objectives for this CAP and budget will be the IEPA Tier 1 objectives for BTEX, MTBE, and PNAs as the off-site property owner has requested that his property be remediated. The only contaminants observed in the recent off-site soil sampling were BTEX constituents.

The soil sampling parameters and corresponding CUOs are:

Analyte	**Method**	**CUO (Tier 1)**
BTEX		
Benzene	EPA 5035/8021B	30.0 μg/kg
Toluene	EPA 5035/8021B	12,000 μg/kg
Ethylbenzene	EPA 5035/8021B	13,000 μg/kg
Xylenes	EPA 5035/8021B	5,600 μg/kg

Benzene concentration in soil exceed the Tier 1 CUO for Class II groundwater in samples B-3 (8'), B-4 (3'), B-4 (8'), B-5 (3'), and B-5 (7').

All laboratory data from the most recent off-site soil borings are presented in Table 1. All sample locations are shown in Figure 3. The estimated extent of off-site soil contamination above Tier 1 CUOs is shown in Figure 4.

3. A description of the remedial technologies selected.

Excavation and disposal has been proven to be effective in immediately removing sources of soil contamination. Excavation is proposed to remove the contamination at the off-site property to the south. An area of approximately 3,200 square feet will be excavated to a depth of approximately 8 feet or until the groundwater table is encountered (approximately 950 cubic yards). The proposed excavation area is shown in Figure 6.

Soils to the north of the canopy were previously removed during early action activities in 2008. Excavation of soils in the vicinity of MW-3 were previously considered as samples collected in 2008 showed levels of total xylenes above the soil saturation limits. An updated sample from the vicinity of MW-3 was collected at the same time the off-site soil samples were collected and the levels in this area have decreased significantly. It is our belief that the elimination of the contaminant source material had a significant effect on contaminant concentrations in that area.

The potential excavation in that area will no longer be necessary and the existing on-site contamination in soil and groundwater will be addressed with institutional and engineering controls.

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.**

During excavation activities, samples will be retrieved from the excavation extents. One sample will be obtained from every 20 linear feet of sidewall, and one sample from every 400 square feet of floor for a total of 12 wall samples and 8 floor samples. One additional sample will be collected for landfill verification. Samples will be submitted for laboratory analysis of BTEX and PNAs. Sample results will be compared to IEPA Tier 1 CUOs for cleanup verification. MECRS also proposes to collect groundwater samples from all existing wells following excavation activities in anticipation of a final TACO evaluation prior to requesting closure. MECRS sampling protocol is provided in Appendix C.

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

The site is currently being used as a gas station and convenience store and it is not anticipated that the use will change.

6. **A description of engineered barriers or institutional controls that will be relied upon to achieve remediation objectives.**

It is anticipated that an industrial/commercial land use restriction will be placed on the site. At this time, no additional preventive, engineering, or institutional controls are proposed, but they will be addressed in a future CAP and budget prior to requesting closure.

7. **The water supply well survey.**

A copy of the SWAP database maps for the site is included in Appendix C. One map shows the site without the extents of the Champaign groundwater ordinance and the other map shows the site within the extents of the ordinance.

8. **Appendices.**

Please see Appendix A for laboratory data reports.
Please see Appendix B for boring logs.
Please see Appendix C for SWAP database maps.
Please see Appendix D for sampling protocol.
Please see Appendix E for the corrective action budget amendment.

9. Site map(s) meeting the requirements of 35 Ill. Adm. Code 732.110(a) or 734.440.

Please see Figure 1 through 6.

10. Engineering design specifications, diagrams, schematics, calculations, manufacturer's specifications, etc.

Not applicable

11. A description of bench/pilot studies.

Not applicable.

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

Not applicable.

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.**

For a complete description of the TACO study, please see the Corrective Action Plan dated July 8, 2013.

14. Provide documentation to demonstrate that 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 form the date of Illinois EPA approval, the owner or operator will provide 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.**

Not applicable.

Section F. Exposure Pathway Exclusion

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.**

Not applicable.

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

For a complete description of exposure pathway exclusion please see the TACO study in the Corrective Action Plan dated July 8, 2013.

Table 1

Site Investigation Soil Analytical Data

TABLE 1.
SOIL ANALYTICAL RESULTS
Freedom Oil Company
Champaign, IL

Analytes/ Sample ID: SAMPLE DATE	Tier I Soil Remediation Obj.	MW-1 3' 08/19/08	MW-1 7' 08/19/08	MW-1 13' 08/19/08	MW-1 17' 08/19/08	MW-2 3' 08/19/08	MW-2 9' 08/19/08	MW-2 15' 08/19/08
MTBE	320	<MDL	<MDL	73.9	21.3	<MDL	<MDL	13.6
Benzene	30	<MDL	140	2.2	1.9	4.3	13.1	3.0
Toluene	12,000	<MDL	<MDL	2.9	2.3	2.7	<MDL	5.4
Ethylbenzene	13,000	5.0	5,460	2.2	<MDL	2.8	61.5	3.1
Total Xylenes	5,600	7.1	519	<MDL	<MDL	7.3	124	7.4
PNAs								
Acenapthene	570,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Acenapthylene	XX	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Anthracene	12,000,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (a) Anthracene	2,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (a) Pyrene	800	127	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (b) Fluoranthene	5,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (g,h,i) Perylene	XX	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (k) Fluoranthene	49,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Chrysene	160,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Dibenzo (a,h) Anthracene	800	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Fluoranthene	4,300,000	84.6	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Fluorene	560,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Ideno (1,2,3-cd) Pyrene	8,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Naphthalene	1,800	<MDL	190	<MDL	<MDL	<MDL	<MDL	<MDL
Phenanthrene	XX	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Pyrene	4,200,000	570	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL

TABLE 1.

SOIL ANALYTICAL RESULTS
Freedom Oil Company
Champaign, IL

Analytes/ Sample ID: SAMPLE DATE	Tier I Soil Remediation Obj.	MW-3 5' 08/19/08	MW-3 7' 08/19/08	MW-3 13' 08/19/08	MW-4 3' 08/19/08	MW-4 7' 08/19/08	MW-4 13' 08/19/08	MW-5 3' 08/19/08
MTBE	320	<MDL	<MDL	26.0	<MDL	<MDL	6.3	<MDL
Benzene	30	6,350	3,120	2.9	<MDL	3.1	3.1	<MDL
Toluene	12,000	514	619	2.4	<MDL	4.5	5.5	1.6
Ethylbenzene	13,000	11,500	106,000	3.7	<MDL	9.5	4.0	<MDL
Total Xylenes	5,600	27,400	428,000	10.9	<MDL	14.0	9.1	<MDL
PNAs								
Acenapthene	570,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Acenapthylene	XX	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Anthracene	12,000,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (a) Anthracene	2,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (a) Pyrene	800	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (b) Fluoranthene	5,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (g,h,i) Perylene	XX	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (k) Fluoranthene	49,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Chrysene	160,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Dibenzo (a,h) Anthracene	800	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Fluoranthene	4,300,000	205	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Fluorene	560,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Ideno (1,2,3-cd) Pyrene	8,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Naphthalene	1,800	367	2,830	<MDL	<MDL	<MDL	<MDL	<MDL
Phenanthrene	XX	106	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Pyrene	4,200,000	209	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL

TABLE 1.
SOIL ANALYTICAL RESULTS
Freedom Oil Company
Champaign, IL

Analytes/ Sample ID: SAMPLE DATE	Tier I Soil Remediation Obj.	MW-5 7' 08/19/08	MW-5 13' 08/19/08	B-1 3' 01/25/11	B-1 7' 01/25/11	B-1 12' 01/25/11	B-2 3' 01/25/11	B-2 7' 01/25/11
MTBE	320	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzene	30	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Toluene	12,000	<MDL	<MDL	<MDL	7.36	<MDL	<MDL	<MDL
Ethylbenzene	13,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Total Xylenes	5,600	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
PNAs								
Acenapthene	570,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Acenapthylene	XX	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Anthracene	12,000,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (a) Anthracene	2,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (a) Pyrene	800	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (b) Fluoranthene	5,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (g,h,i) Perylene	XX	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (k) Fluoranthene	49,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Chrysene	160,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Dibenzo (a,h) Anthracene	800	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Fluoranthene	4,300,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Fluorene	560,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Ideno (1,2,3-cd) Pyrene	8,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Naphthalene	1,800	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Phenanthrene	XX	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Pyrene	4,200,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL

TABLE 1.
SOIL ANALYTICAL RESULTS
Freedom Oil Company
Champaign, IL

Analytes/ Sample ID: SAMPLE DATE	Tier I Soil Remediation Obj.	B-2 12' 01/25/11	MW-6 3' 03/24/11	MW-6 7' 03/24/11	MW-7 3' 03/24/11	MW-7 7' 03/24/11	MW-8 3' 03/24/11	MW-8 7' 03/24/11
MTBE	320	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzene	30	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Toluene	12,000	<MDL	<MDL	<MDL	<MDL	4.65	<MDL	<MDL
Ethylbenzene	13,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Total Xylenes	5,600	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
PNAs								
Acenapthene	570,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Acenapthylene	XX	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Anthracene	12,000,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (a) Anthracene	2,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (a) Pyrene	800	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (b) Fluoranthene	5,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (g,h,i) Perylene	XX	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Benzo (k) Fluoranthene	49,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Chrysene	160,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Dibenzo (a,h) Anthracene	800	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Fluoranthene	4,300,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Fluorene	560,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Ideno (1,2,3-cd) Pyrene	8,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Naphthalene	1,800	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Phenanthrene	XX	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL
Pyrene	4,200,000	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL	<MDL

TABLE 1.
SOIL ANALYTICAL RESULTS
Freedom Oil Company
Champaign, IL

Analytes/ Sample ID: SAMPLE DATE	Tier I Soil Remediation Obj.	MW-9 3' 03/24/11	MW-9 7' 03/24/11	B-3 3' 10/24/17	B-3 8' 10/24/17	B-4 3' 10/24/17	B-4 8' 10/24/17	B-5 3' 10/24/17
MTBE	320	<MDL	<MDL	<26	<25	<27	<26	<27
Benzene	30	<MDL	<MDL	<26	290	190	160	230
Toluene	12,000	<MDL	9.06	<26	<25	59	<26	<27
Ethylbenzene	13,000	<MDL	<MDL	<26	1,300	250	95	260
Total Xylenes	5,600	<MDL	<MDL	230	95	550	<79	400
PNAs								
Acenapthene	570,000	<MDL	<MDL	<85	<83	<88	<86	<88
Acenapthylene	XX	<MDL	<MDL	<85	<83	<88	<86	<88
Anthracene	12,000,000	<MDL	<MDL	<85	<83	<88	<86	<88
Benzo (a) Anthracene	2,000	<MDL	<MDL	14	<8.3	<8.8	<8.6	<8.8
Benzo (a) Pyrene	800	<MDL	<MDL	<8.5	<8.3	<8.8	<8.6	<8.8
Benzo (b) Fluoranthene	5,000	<MDL	<MDL	13	<8.3	<8.8	<8.6	<8.8
Benzo (g,h,i) Perylene	XX	<MDL	<MDL	40	<8.3	<8.8	<8.6	<8.8
Benzo (k) Fluoranthene	49,000	<MDL	<MDL	8.5	<4.2	<4.5	<4.4	<4.4
Chrysene	160,000	<MDL	<MDL	32	<8.3	<8.8	<8.6	<8.8
Dibenzo (a,h) Anthracene	800	<MDL	<MDL	<8.5	<8.3	<8.8	<8.6	<8.8
Fluoranthene	4,300,000	<MDL	<MDL	30	<8.3	<8.8	<8.6	15
Fluorene	560,000	<MDL	<MDL	<85	<83	<88	<86	<88
Ideno (1,2,3-cd) Pyrene	8,000	<MDL	<MDL	<8.5	<8.3	<8.8	<8.6	<8.8
Naphthalene	1,800	<MDL	<MDL	350	350	<88	160	300
Phenanthrene	XX	<MDL	<MDL	<85	<83	<88	<86	<88
Pyrene	4,200,000	<MDL	<MDL	23	<8.3	<8.8	<8.6	<8.8

TABLE 1.
SOIL ANALYTICAL RESULTS
Freedom Oil Company
Champaign, IL

Analytes/ Sample ID: SAMPLE DATE	Tier I Soil Remediation Obj.	B-5 7' 10/24/17	B-6 4' 10/24/17	B-6 7' 10/24/17				
MTBE	320	<27	31	<29				
Benzene	30	410	1,300	420				
Toluene	12,000	<27	670	230				
Ethylbenzene	13,000	250	1,200	340				
Total Xylenes	5,600	170	5,600	1,900				
PNAs								
Acenapthene	570,000	<86	280	<90				
Acenapthylene	XX	<86	<90	<90				
Anthracene	12,000,000	<86	440	180				
Benzo (a) Anthracene	2,000	<8.6	23	140				
Benzo (a) Pyrene	800	<8.6	210	<9.0				
Benzo (b) Fluoranthene	5,000	<8.6	330	150				
Benzo (g,h,i) Perylene	XX	<8.6	220	170				
Benzo (k) Fluoranthene	49,000	<4.3	96	56				
Chrysene	160,000	<8.6	380	230				
Dibenzo (a,h) Anthracene	800	<8.6	<9.0	19				
Fluoranthene	4,300,000	<8.6	640	270				
Fluorene	560,000	<86	<90	<90				
Ideno (1,2,3-cd) Pyrene	8,000	<8.6	130	77				
Naphthalene	1,800	180	150	160				
Phenanthrene	XX	<86	720	480				
Pyrene	4,200,000	<8.6	520	220				

ALL RESULTS REPORTED IN PARTS PER BILLION (ug/kg, ug/L)
XX = Tier I soil remediation objective not listed in TACO tables.
NA = not analyzed
M = Matrix interferences identified

TACO Parameters

Sample #	foc	pH	Bulk Density,	Particle Density	% Moisture	Porosity
Surface	2.90%	7.40	1.26	2.52	42.8%	0.50
Subsurface	0.87%	7.77	1.50	2.64	27.8%	0.43

Table 2

Site Investigation Groundwater Analytical Data

Table 2: Groundwater Analytical Data
Freedom Oil Company
Champaign, Illinois

Sample #	Date	DTW	GWE	Benzene	Toluene	E-benzene	Xylenes	Total BTEX	MTBE	Napthalene
MW-1	Elevation Top of Casing =			98.48						
1	11/12/2008	6.17	92.31	**16,200**	**10,700**	**8,240**	**29,400**	**64,540**	**<200**	**1,300**
2	3/31/2011	5.95	92.53	**1,390**	6.45	575	27.1	1,423.55	60.7	86.3
MW-2	Elevation Top of Casing =			100.00						
1	11/12/2008	6.74	93.26	**5,150**	86.5	**4,940**	**10,200**	**20,376.5**	**101**	**1,170**
2	3/31/2011	6.68	93.32	**11.1**	<5.00	<5.00	<15.0	<36.1	22.9	<MDL
MW-3	Elevation Top of Casing =			96.62						
1	11/12/2008	5.35	91.27	2.4	<2.0	<2.0	<5.0	<11.4	<2.0	<MDL
2	3/31/2011	5.40	91.22	**135**	<5.00	103	67.8	<310.8	<5.00	8.41
MW-4	Elevation Top of Casing =			98.22						
1	11/12/2008	6.60	91.62	<2.0	<2.0	<2.0	<5.0	<11.0	<2.0	<MDL
2	3/31/2011	6.63	91.59	<5.00	<5.00	<5.00	<15.0	<30.00	13.7	<MDL
MW-5	Elevation Top of Casing =			98.34						
1	11/12/2008	7.30	91.04	**3,620**	65.6	344	544	4,573.6	21.7	58.1
2	3/31/2011	7.27	91.07	<5.00	<5.00	<5.00	<15.0	<30.00	5.63	<MDL
MW-6	Elevation Top of Casing =			98.13						
1	3/31/2011	5.27	92.86	<5.00	<5.00	<5.00	<15.0	<30.00	<5.00	<MDL
MW-7	Elevation Top of Casing =			97.62						
1	3/31/2011	5.09	92.53	<5.00	<5.00	<5.00	<15.0	<30.00	<5.00	<MDL
MW-8	Elevation Top of Casing =			97.11						
1	3/31/2011	5.08	92.03	<5.00	<5.00	<5.00	<15.0	<30.00	<5.00	<MDL
MW-9	Elevation Top of Casing =			97.38						
1	3/31/2011	6.51	90.87	**124**	7.52	195	574	<900.52	<5.00	49.1

Notes:

1. All results in parts per billion (ppb).
2. IEPA Generic Cleanup Objectives:

Benzene	Toluene	E-benzene	Xylenes	Total BTEX	MTBE	Napthalene
5.0 ppb	1000 ppb	700 ppb	10,000 ppb	11,705 ppb	70 ppb	140 ppb

3. -- = No data available
4. DTW = Depth to Water
5. GWE = Groundwater Elevation referenced to datum point
6. All PNAs below detection limits except napthalene concentrations as noted.
7. ND = No PNA constituents detected.

Figure 1

Area Map

Area Map

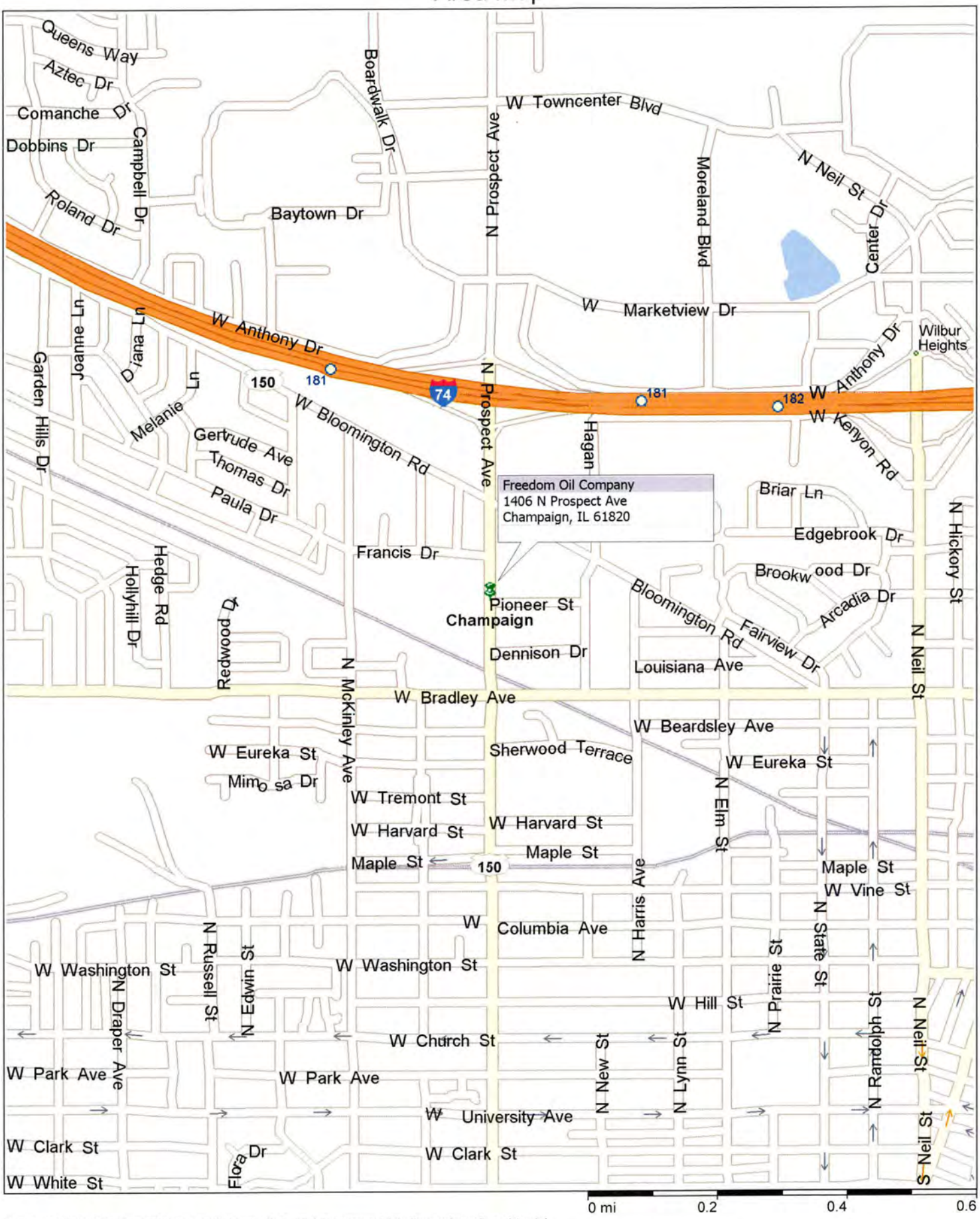

Figure 2

Site Map

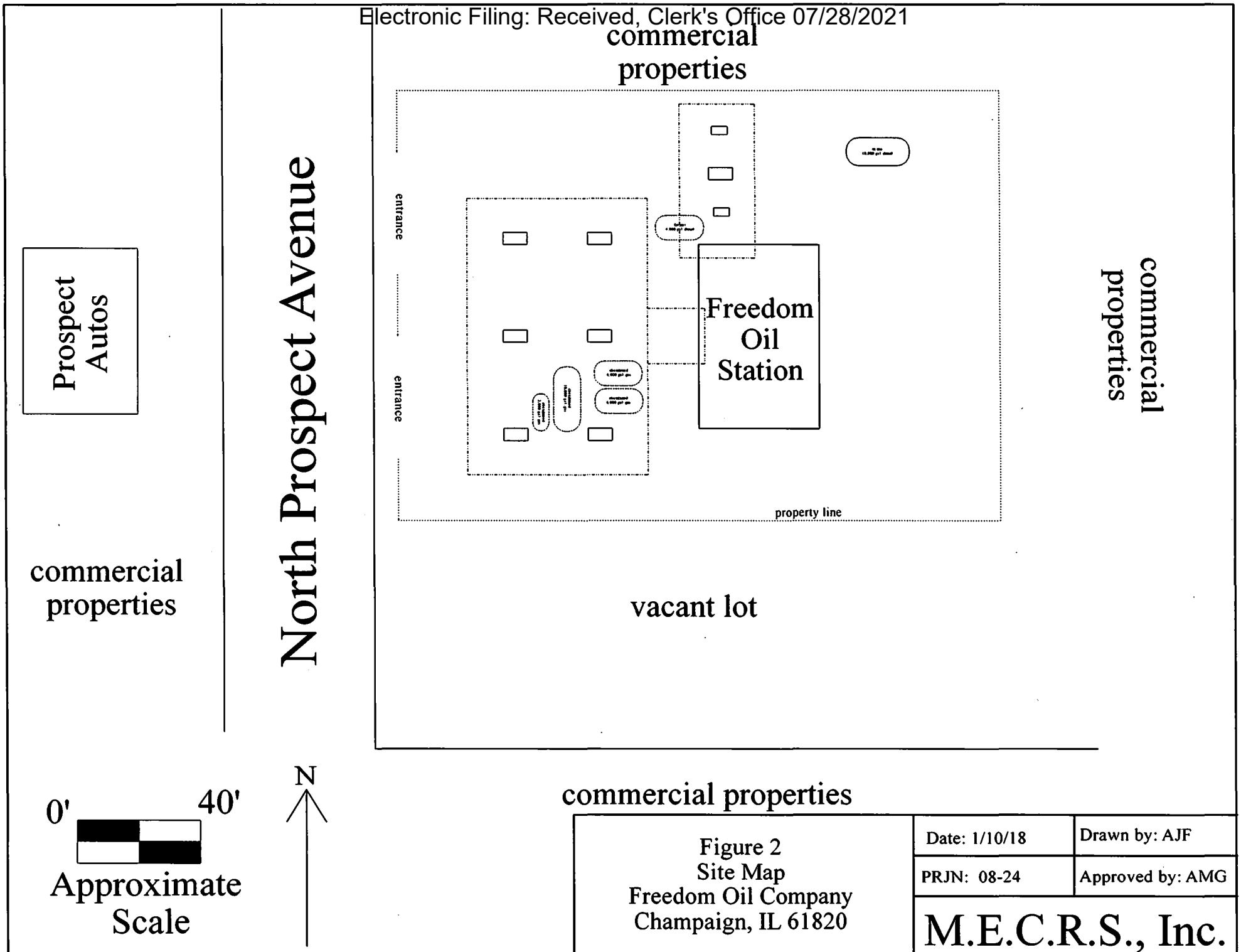

Figure 2
Site Map
Freedom Oil Company
Champaign, IL 61820

Date: 1/10/18	Drawn by: AJF
PRJN: 08-24	Approved by: AMG

M.E.C.R.S., Inc.

Figure 3

Soil Boring Location Map

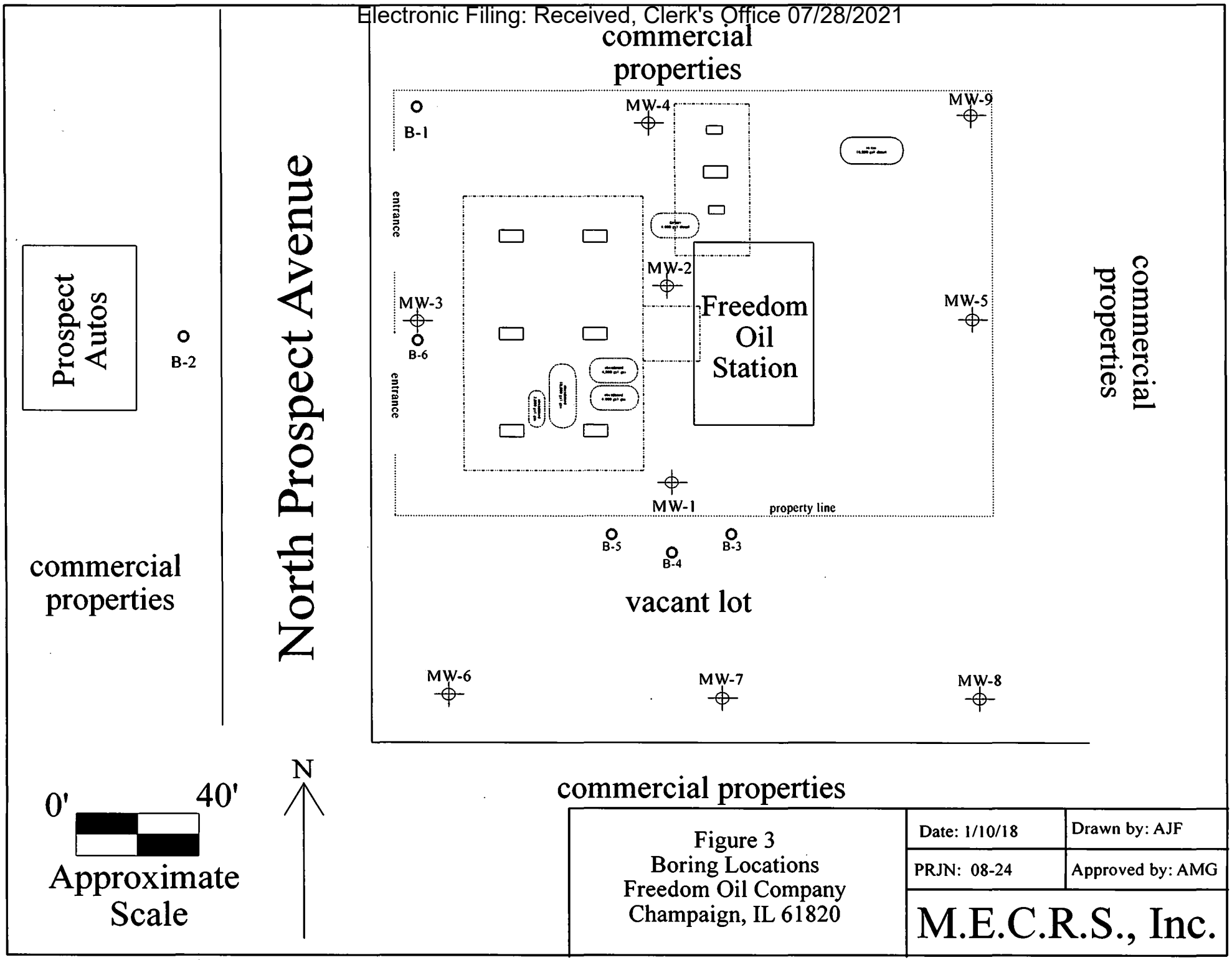

Figure 3
Boring Locations
Freedom Oil Company
Champaign, IL 61820

Date: 1/10/18	Drawn by: AJF
PRJN: 08-24	Approved by: AMG

M.E.C.R.S., Inc.

Figure 4

Estimated Extent of Soil Contamination

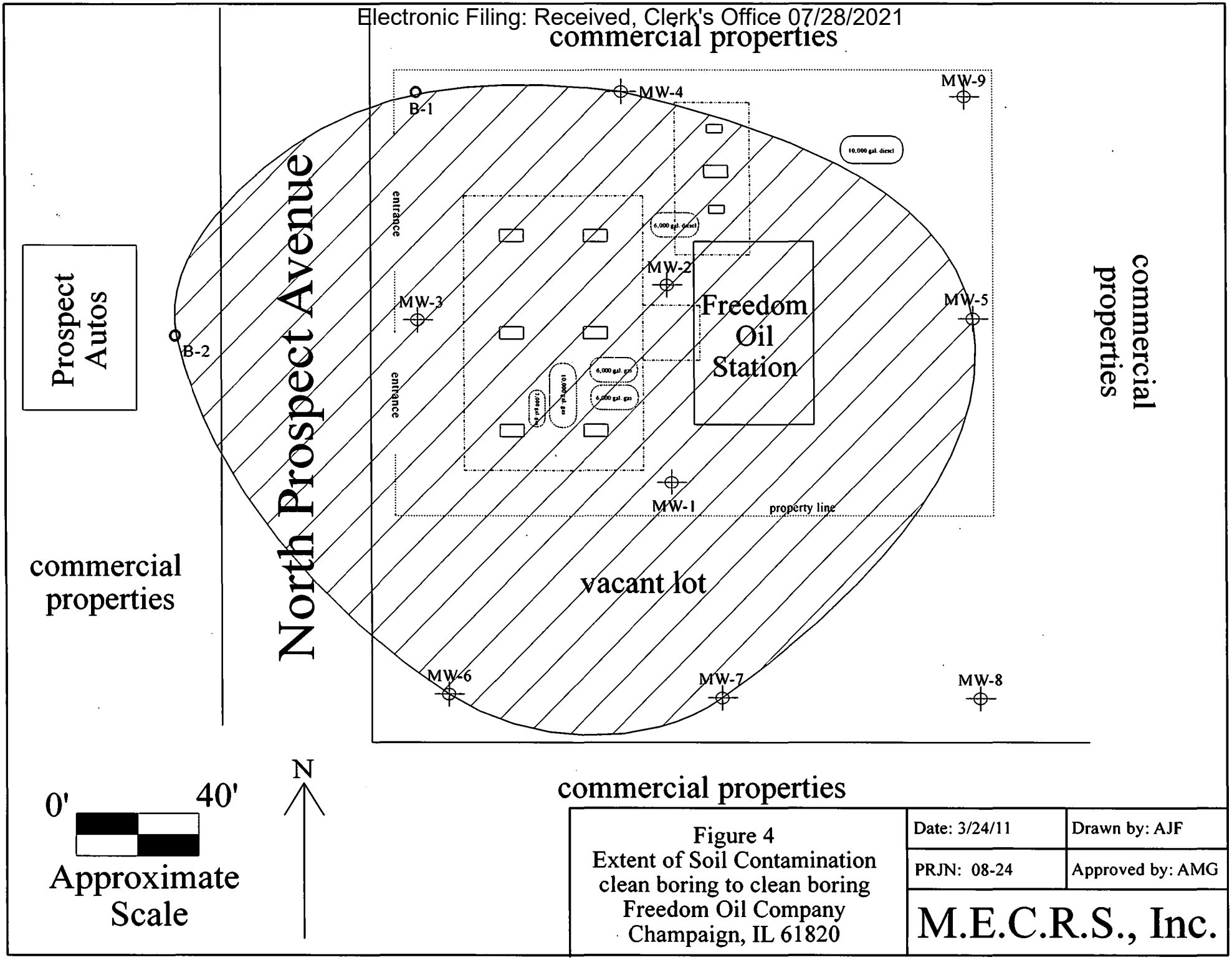

Figure 4
Extent of Soil Contamination
clean boring to clean boring
Freedom Oil Company
Champaign, IL 61820

Date: 3/24/11	Drawn by: AJF
PRJN: 08-24	Approved by: AMG

M.E.C.R.S., Inc.

Figure 5

Estimated Extent of Groundwater Contamination

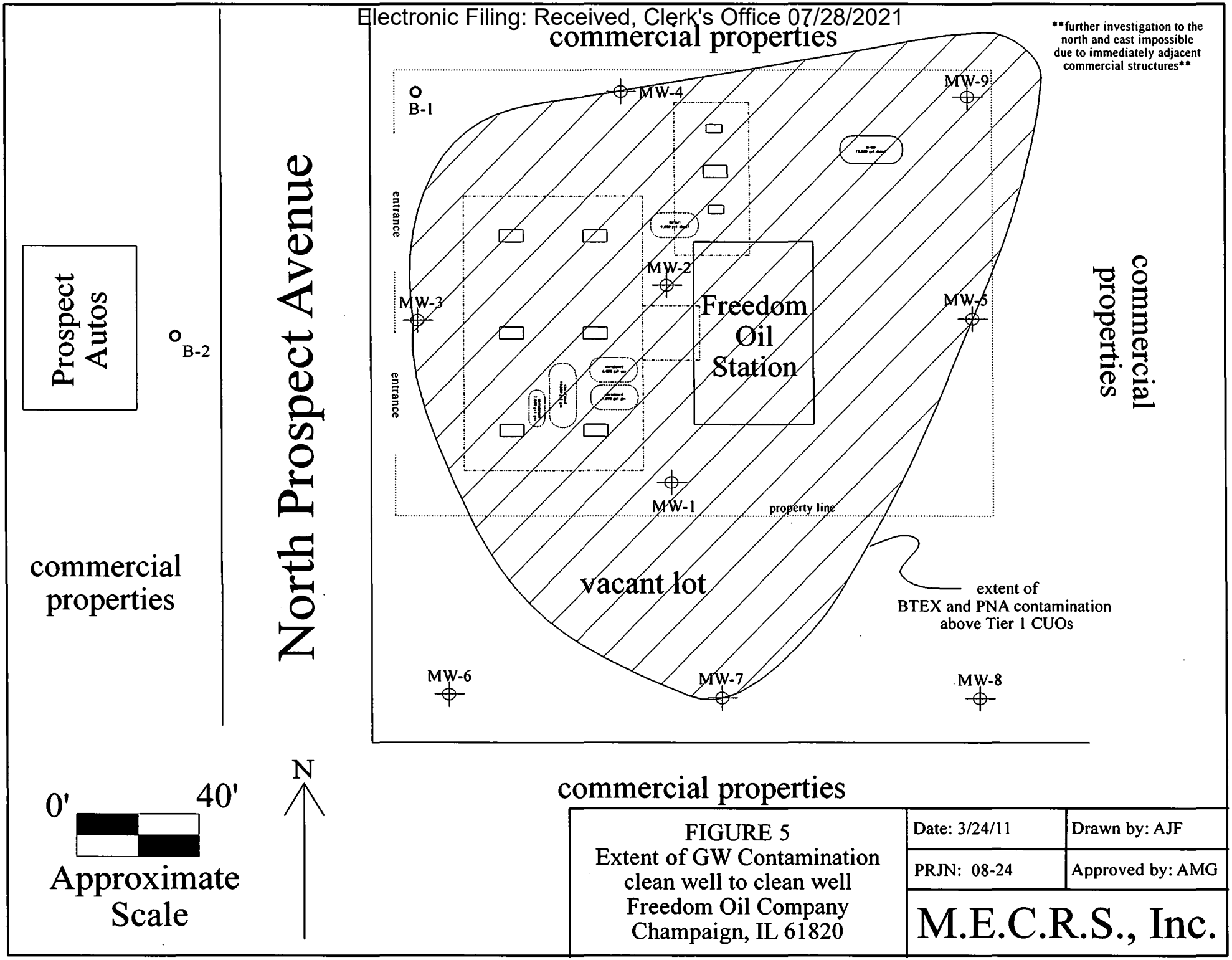

FIGURE 5
Extent of GW Contamination
clean well to clean well
Freedom Oil Company
Champaign, IL 61820

Date: 3/24/11	Drawn by: AJF
PRJN: 08-24	Approved by: AMG

M.E.C.R.S., Inc.

Figure 6

Proposed Off-Site Excavation Extents

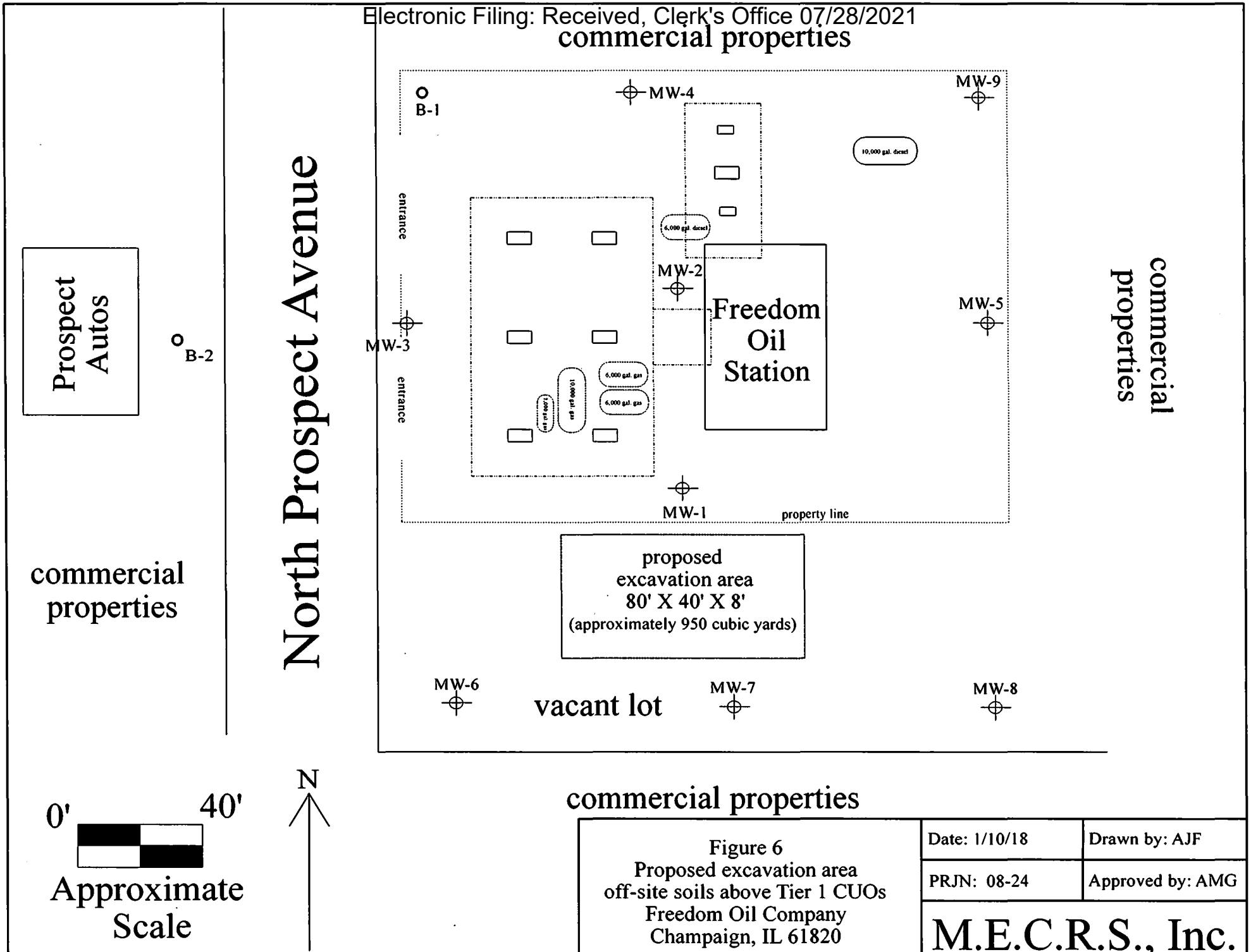

Figure 6 Proposed excavation area off-site soils above Tier 1 CUOs Freedom Oil Company Champaign, IL 61820	Date: 1/10/18 | Drawn by: AJF PRJN: 08-24 | Approved by: AMG M.E.C.R.S., Inc.

Appendix A

Laboratory Data Reports

PDC Laboratories, Inc.

PROFESSIONAL • DEPENDABLE • COMMITTED

November 10, 2017

Allan Green
Midwest Environmental Tremont
Box 614
Tremont, IL 61568

Dear Allan Green:

Please find enclosed the analytical results for the sample(s) the laboratory received on **10/26/17 11:05 am** and logged in under work order **7104569**. All testing is performed according to our current TNI certifications unless otherwise noted. This report cannot be reproduced, except in full, without the written permission of PDC Laboratories, Inc.

If you have any questions regarding your report, please contact your project manager. Quality and timely data is of the utmost importance to us.

PDC Laboratories, Inc. appreciates the opportunity to provide you with analytical expertise. We are always trying to improve our customer service and we welcome you to contact the Vice President, John LaPayne with any feedback you have about your experience with our laboratory.

Sincerely,

Senior Project Manager
(309) 692-9688 x1719
kstepping@pdclab.com

PDC Laboratories, Inc.
2231 West Altorfer Drive
Peoria, IL 61615
(800) 752-6651

ANALYTICAL RESULTS

Sample: 7104569-01
Name: B-3, 3'
Matrix: Solid - Grab

Sampled: 10/24/17 10:30
Received: 10/26/17 11:05
PO #: 08-24

Parameter	Result	Unit	Qualifier	Prepared	Analyzed	Analyst	Method
General Chemistry - PIA							
Solids - total solids (TS)	79	%		10/26/17 14:40	10/26/17 15:13	SAH/C	SM 2540G*
Polynuclear Aromatic Hydrocarbons - PIA							
Acenaphthene	< 85	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Acenaphthylene	< 85	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Anthracene	< 85	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Benzo(a)anthracene	14	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Benzo(a)pyrene	< 8.5	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Benzo(b)fluoranthene	13	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Benzo(g,h,i)perylene	40	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Benzo(k)fluoranthene	8.5	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Chrysene	32	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Dibenzo(a,h)anthracene	< 8.5	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Fluoranthene	30	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Fluorene	< 85	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Indeno(1,2,3-cd)pyrene	< 8.5	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Naphthalene	350	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Phenanthrene	< 85	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Pyrene	23	ug/kg dry		11/02/17 13:01	11/03/17 16:52	ELS	SW 8310
Volatile Organics - PIA							
Benzene	< 26	ug/kg dry		10/27/17 12:32	10/27/17 17:11	MAB	SW 8260B
Ethylbenzene	< 26	ug/kg dry		10/27/17 12:32	10/27/17 17:11	MAB	SW 8260B
MTBE	< 26	ug/kg dry		10/27/17 12:32	10/27/17 17:11	MAB	SW 8260B
Toluene	< 26	ug/kg dry		10/27/17 12:32	10/27/17 17:11	MAB	SW 8260B
Xylenes- Total	230	ug/kg dry		10/27/17 12:32	10/27/17 17:11	MAB	SW 8260B

PDC Laboratories, Inc.
2231 West Altorfer Drive
Peoria, IL 61615
(800) 752-6651

ANALYTICAL RESULTS

Sample: 7104569-02
Name: B-3, 8'
Matrix: Solid - Grab

Sampled: 10/24/17 10:45
Received: 10/26/17 11:05
PO #: 08-24

Parameter	Result	Unit	Qualifier	Prepared	Analyzed	Analyst	Method
General Chemistry - PIA							
Solids - total solids (TS)	81	%		10/26/17 14:40	10/26/17 15:13	SAH/C	SM 2540G*
Polynuclear Aromatic Hydrocarbons - PIA							
Acenaphthene	< 83	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Acenaphthylene	< 83	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Anthracene	< 83	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Benzo(a)anthracene	< 8.3	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Benzo(a)pyrene	< 8.3	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Benzo(b)fluoranthene	< 8.3	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Benzo(g,h,i)perylene	< 8.3	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Benzo(k)fluoranthene	< 4.2	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Chrysene	< 8.3	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Dibenzo(a,h)anthracene	< 8.3	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Fluoranthene	< 8.3	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Fluorene	< 83	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Indeno(1,2,3-cd)pyrene	< 8.3	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Naphthalene	350	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Phenanthrene	< 83	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Pyrene	< 8.3	ug/kg dry		11/02/17 13:01	11/03/17 17:18	ELS	SW 8310
Volatile Organics - PIA							
Benzene	290	ug/kg dry		10/27/17 12:32	10/27/17 19:58	MAB	SW 8260B
Ethylbenzene	1300	ug/kg dry		10/27/17 12:32	10/27/17 19:58	MAB	SW 8260B
MTBE	< 25	ug/kg dry		10/27/17 12:32	10/27/17 19:58	MAB	SW 8260B
Toluene	< 25	ug/kg dry		10/27/17 12:32	10/27/17 19:58	MAB	SW 8260B
Xylenes- Total	95	ug/kg dry		10/27/17 12:32	10/27/17 19:58	MAB	SW 8260B

PDC Laboratories, Inc.
2231 West Altorfer Drive
Peoria, IL 61615
(800) 752-6651

ANALYTICAL RESULTS

Sample: 7104569-03
Name: B-4, 3'
Matrix: Solid - Grab

Sampled: 10/24/17 11:15
Received: 10/26/17 11:05
PO #: 08-24

Parameter	Result	Unit	Qualifier	Prepared	Analyzed	Analyst	Method
General Chemistry - PIA							
Solids - total solids (TS)	76	%		10/26/17 14:40	10/26/17 15:13	SAH/C	SM 2540G*
Polynuclear Aromatic Hydrocarbons - PIA							
Acenaphthene	< 88	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Acenaphthylene	< 88	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Anthracene	< 88	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Benzo(a)anthracene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Benzo(a)pyrene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Benzo(b)fluoranthene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Benzo(g,h,i)perylene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Benzo(k)fluoranthene	< 4.5	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Chrysene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Dibenzo(a,h)anthracene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Fluoranthene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Fluorene	< 88	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Indeno(1,2,3-cd)pyrene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Naphthalene	< 88	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Phenanthrene	< 88	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Pyrene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 17:43	ELS	SW 8310
Volatile Organics - PIA							
Benzene	190	ug/kg dry		10/27/17 12:32	10/27/17 17:39	MAB	SW 8260B
Ethylbenzene	250	ug/kg dry		10/27/17 12:32	10/27/17 17:39	MAB	SW 8260B
MTBE	< 27	ug/kg dry		10/27/17 12:32	10/27/17 17:39	MAB	SW 8260B
Toluene	59	ug/kg dry		10/27/17 12:32	10/27/17 17:39	MAB	SW 8260B
Xylenes- Total	550	ug/kg dry		10/27/17 12:32	10/27/17 17:39	MAB	SW 8260B

PDC Laboratories, Inc.
2231 West Altorfer Drive
Peoria, IL 61615
(800) 752-6651

ANALYTICAL RESULTS

Sample: 7104569-04
Name: B-4, 8'
Matrix: Solid - Grab

Sampled: 10/24/17 11:30
Received: 10/26/17 11:05
PO #: 08-24

Parameter	Result	Unit	Qualifier	Prepared	Analyzed	Analyst	Method
General Chemistry - PIA							
Solids - total solids (TS)	78	%		10/26/17 14:40	10/26/17 15:13	SAH/C	SM 2540G*
Polynuclear Aromatic Hydrocarbons - PIA							
Acenaphthene	< 86	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Acenaphthylene	< 86	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Anthracene	< 86	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Benzo(a)anthracene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Benzo(a)pyrene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Benzo(b)fluoranthene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Benzo(g,h,i)perylene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Benzo(k)fluoranthene	< 4.4	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Chrysene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Dibenzo(a,h)anthracene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Fluoranthene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Fluorene	< 86	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Indeno(1,2,3-cd)pyrene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Naphthalene	160	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Phenanthrene	< 86	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Pyrene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 18:09	ELS	SW 8310
Volatile Organics - PIA							
Benzene	160	ug/kg dry		10/27/17 12:32	10/27/17 18:07	MAB	SW 8260B
Ethylbenzene	95	ug/kg dry		10/27/17 12:32	10/27/17 18:07	MAB	SW 8260B
MTBE	< 26	ug/kg dry		10/27/17 12:32	10/27/17 18:07	MAB	SW 8260B
Toluene	< 26	ug/kg dry		10/27/17 12:32	10/27/17 18:07	MAB	SW 8260B
Xylenes- Total	< 79	ug/kg dry		10/27/17 12:32	10/27/17 18:07	MAB	SW 8260B

PDC Laboratories, Inc.
2231 West Altorfer Drive
Peoria, IL 61615
(800) 752-6651

ANALYTICAL RESULTS

Sample: 7104569-05
Name: B-5, 3'
Matrix: Solid - Grab

Sampled: 10/24/17 12:00
Received: 10/26/17 11:05
PO #: 08-24

Parameter	Result	Unit	Qualifier	Prepared	Analyzed	Analyst	Method
General Chemistry - PIA							
Solids - total solids (TS)	76	%		10/26/17 14:40	10/26/17 15:13	SAH/C	SM 2540G*
Polynuclear Aromatic Hydrocarbons - PIA							
Acenaphthene	< 88	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Acenaphthylene	< 88	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Anthracene	< 88	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Benzo(a)anthracene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Benzo(a)pyrene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Benzo(b)fluoranthene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Benzo(g,h,i)perylene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Benzo(k)fluoranthene	< 4.4	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Chrysene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Dibenzo(a,h)anthracene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Fluoranthene	15	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Fluorene	< 88	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Indeno(1,2,3-cd)pyrene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Naphthalene	300	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Phenanthrene	< 88	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Pyrene	< 8.8	ug/kg dry		11/02/17 13:01	11/03/17 18:35	ELS	SW 8310
Volatile Organics - PIA							
Benzene	230	ug/kg dry		10/27/17 12:32	10/27/17 20:26	MAB	SW 8260B
Ethylbenzene	260	ug/kg dry		10/27/17 12:32	10/27/17 20:26	MAB	SW 8260B
MTBE	< 27	ug/kg dry		10/27/17 12:32	10/27/17 20:26	MAB	SW 8260B
Toluene	< 27	ug/kg dry		10/27/17 12:32	10/27/17 20:26	MAB	SW 8260B
Xylenes- Total	400	ug/kg dry		10/27/17 12:32	10/27/17 20:26	MAB	SW 8260B

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ANALYTICAL RESULTS

Sample: 7104569-06
Name: B-5, 7'
Matrix: Solid - Grab

Sampled: 10/24/17 12:15
Received: 10/26/17 11:05
PO #: 08-24

Parameter	Result	Unit	Qualifier	Prepared	Analyzed	Analyst	Method
General Chemistry - PIA							
Solids - total solids (TS)	78	%		10/26/17 14:40	10/26/17 15:13	SAH/C	SM 2540G*
Polynuclear Aromatic Hydrocarbons - PIA							
Acenaphthene	< 86	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Acenaphthylene	< 86	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Anthracene	< 86	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Benzo(a)anthracene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Benzo(a)pyrene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Benzo(b)fluoranthene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Benzo(g,h,i)perylene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Benzo(k)fluoranthene	< 4.3	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Chrysene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Dibenzo(a,h)anthracene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Fluoranthene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Fluorene	< 86	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Indeno(1,2,3-cd)pyrene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Naphthalene	180	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Phenanthrene	< 86	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Pyrene	< 8.6	ug/kg dry		11/02/17 13:01	11/03/17 19:01	ELS	SW 8310
Volatile Organics - PIA							
Benzene	410	ug/kg dry		10/27/17 12:32	10/27/17 18:35	MAB	SW 8260B
Ethylbenzene	250	ug/kg dry		10/27/17 12:32	10/27/17 18:35	MAB	SW 8260B
MTBE	< 27	ug/kg dry		10/27/17 12:32	10/27/17 18:35	MAB	SW 8260B
Toluene	< 27	ug/kg dry		10/27/17 12:32	10/27/17 18:35	MAB	SW 8260B
Xylenes- Total	170	ug/kg dry		10/27/17 12:32	10/27/17 18:35	MAB	SW 8260B

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2231 West Altorfer Drive
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ANALYTICAL RESULTS

Sample: 7104569-07
Name: B-6, 4'
Matrix: Solid - Grab

Sampled: 10/24/17 12:45
Received: 10/26/17 11:05
PO #: 08-24

Parameter	Result	Unit	Qualifier	Prepared	Analyzed	Analyst	Method
General Chemistry - PIA							
Solids - total solids (TS)	75	%		10/26/17 14:40	10/26/17 15:13	SAH/C	SM 2540G*
Polynuclear Aromatic Hydrocarbons - PIA							
Acenaphthene	280	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Acenaphthylene	< 90	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Anthracene	440	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Benzo(a)anthracene	23	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Benzo(a)pyrene	210	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Benzo(b)fluoranthene	330	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Benzo(g,h,i)perylene	220	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Benzo(k)fluoranthene	96	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Chrysene	380	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Dibenzo(a,h)anthracene	< 9.0	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Fluoranthene	640	ug/kg dry		11/02/17 13:01	11/09/17 21:35	ELS	SW 8310
Fluorene	< 90	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Indeno(1,2,3-cd)pyrene	130	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Naphthalene	150	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Phenanthrene	720	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Pyrene	520	ug/kg dry		11/02/17 13:01	11/03/17 19:27	ELS	SW 8310
Volatile Organics - PIA							
Benzene	1300	ug/kg dry		10/27/17 12:32	10/27/17 19:30	MAB	SW 8260B
Ethylbenzene	1200	ug/kg dry		10/27/17 12:32	10/27/17 19:30	MAB	SW 8260B
MTBE	31	ug/kg dry		10/27/17 12:32	10/27/17 19:30	MAB	SW 8260B
Toluene	670	ug/kg dry		10/27/17 12:32	10/27/17 19:30	MAB	SW 8260B
Xylenes- Total	5600	ug/kg dry		10/27/17 12:32	10/27/17 19:30	MAB	SW 8260B

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(800) 752-6651

ANALYTICAL RESULTS

Sample: 7104569-08
Name: B-6, 7'
Matrix: Solid - Grab

Sampled: 10/24/17 13:00
Received: 10/26/17 11:05
PO #: 08-24

Parameter	Result	Unit	Qualifier	Prepared	Analyzed	Analyst	Method
General Chemistry - PIA							
Solids - total solids (TS)	75	%		10/26/17 14:40	10/26/17 15:13	SAH/C	SM 2540G*
Polynuclear Aromatic Hydrocarbons - PIA							
Acenaphthene	< 90	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Acenaphthylene	< 90	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Anthracene	180	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Benzo(a)anthracene	140	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Benzo(a)pyrene	< 9.0	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Benzo(b)fluoranthene	150	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Benzo(g,h,i)perylene	170	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Benzo(k)fluoranthene	56	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Chrysene	230	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Dibenzo(a,h)anthracene	19	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Fluoranthene	270	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Fluorene	< 90	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Indeno(1,2,3-cd)pyrene	77	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Naphthalene	160	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Phenanthrene	480	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Pyrene	220	ug/kg dry		11/02/17 13:01	11/03/17 19:52	ELS	SW 8310
Volatile Organics - PIA							
Benzene	420	ug/kg dry		10/27/17 12:32	10/27/17 19:03	MAB	SW 8260B
Ethylbenzene	340	ug/kg dry		10/27/17 12:32	10/27/17 19:03	MAB	SW 8260B
MTBE	< 29	ug/kg dry		10/27/17 12:32	10/27/17 19:03	MAB	SW 8260B
Toluene	230	ug/kg dry		10/27/17 12:32	10/27/17 19:03	MAB	SW 8260B
Xylenes- Total	1900	ug/kg dry		10/27/17 12:32	10/27/17 19:03	MAB	SW 8260B

PDC Laboratories, Inc.
2231 West Altorfer Drive
Peoria, IL 61615
(800) 752-6651

NOTES

Specific method revisions used for analysis are available upon request.

Certifications

CHI - McHenry, IL
TNI Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100279
Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 17556

PIA - Peoria, IL
TNI Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100230
Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 17553
Wastewater Certifications: Arkansas (88-0677); Iowa (240); Kansas (E-10338)
Hazardous/Solid Waste Certifications: Arkansas (88-0677); Iowa (240); Kansas (E-10338)

SPMO - Springfield, MO
USEPA DMR-QA Program

STL - St. Louis, MO
TNI Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through KS Lab No. E-10389
Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 171050
Drinking Water Certifications: Missouri (1050)
Missouri Department of Natural Resources

* Not a TNI accredited analyte

Certified by: Kurt Stepping, Senior Project Manager

Illinois Environmental Protection Agency
Leaking Underground Storage Tank Program
Laboratory Certification for Chemical Analysis

A. Site Identification

IEMA Incident # (6- or 8-digit): 20080255 IEPA LPC# (10-digit): 0910105433

Site Name: Freedom Oil Company

Site Address (Not a P.O. Box): 1406 North Prospect

City: Champaign County: Champaign ZIP Code: 61820

Leaking UST Technical File

B. Sample Collector

I certify that:

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

C. Laboratory Representative

I certify that: FOR PDC 7104569

1. Proper chain-of-custody procedures were followed as documented on the chain-of-custody forms (initial)
2. Sample integrity was maintained by proper preservation. (initial)
3. All samples were properly labeled. (initial)
4. Quality assurance/quality control procedures were established and carried out. (initial)

5. Sample holding times were not exceeded. (initial)

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

7. An accredited lab performed quantitative analysis using test methods identified in 35 IAC 186.180 (for samples collected on or after January 1, 2003). (initial)

D. Signatures

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

Sample Collector	Laboratory Representative
Name: Andrew Fetterolf	Name: Kurt Stepping
Title: Project Manager	Title: Senior Project Manager
Company: M.E.C.R.S, Inc.	Company: PDC Laboratories
Address: 22200 IL Rte. 9, P.O. Box 614	Address: 2231 W. Altorfer
City: Tremont	City: Peoria
State: Illinois	State: Illinois
ZIP Code: 61568	ZIP Code: 61615
Phone: (309) 925-5551	Phone: (309) 692-9688
Signature:	Signature:
Date: 10/24/17	Date: 11-10-17

PDC Laboratories, Inc.
2231 W. Altorfer Dr
Peoria, IL 61615

CHAIN OF CUSTODY RECORD

State where samples were collected IL

Phone: (800) 752-6651
Fax: (309) 692-9689
www.pdclab.com

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

1 CLIENT	P.O. NUMBER	PROJECT NAME	DATE SHIPPED
M.E.C.R.S.	08-24	Freedom Champaign	10/26/17

ADDRESS	PHONE	EMAIL	MEANS SHIPPED
22200 IL Rt. 9, PO Box 614	309-925-5551	mdorsteve@frontier.com	hand

CITY	STATE	ZIP
Tremont	IL	61568

SAMPLER (PLEASE PRINT): Andrew Fetterolf

CONTACT PERSON: Allan Green

SAMPLER'S SIGNATURE: Andrew Fetterolf

MATRIX TYPES:
WW - WASTE WATER
DW - DRINKING WATER
GW - GROUND WATER
WWSL - SLUDGE
NAS - SOLID
LCHT - LEACHATE
OTHER:

3 ANALYSIS REQUESTED: BTEX + MTBE; PNA

4 WORK ORDER (FOR LAB USE ONLY)
LOGIN #: 7104569-8 PDC
LOGGED BY:
PROJECT:
PROJ MGR:

2 SAMPLE DESCRIPTION AS YOU WANT TO REPORT	DATE COLLECTED	TIME COLLECTED	SAMPLE TYPE GRAB	SAMPLE TYPE COMP	MATRIX TYPE	BOTTLE COUNT	BTEX + MTBE	PNA	REMARKS
B-3, 3'	10/24	10:30	X		NAS	5	X	X	
B-3, 8'	10/24	10:45	X		NAS	5	X	X	
B-4, 3'	10/24	11:15	X		NAS	5	X	X	
B-4, 8'	10/24	11:30	X		NAS	5	X	X	
B-5, 3'	10/24	12:00	X		NAS	5	X	X	
B-5, 7'	10/24	12:15	X		NAS	5	X	X	
B-6, 4'	10/24	12:45	X		NAS	5	X	X	
B-6, 7'	10/24	1:00	X		NAS	5	X	X	

5 TURNAROUND TIME REQUESTED (RUSH TAT IS SUBJECT TO APPROVAL AND SURCHARGE) [X] NORMAL [ ] RUSH

DATE RESULTS NEEDED

6 The sample temperature will be measured upon receipt at the lab. By initialing this area, you request that we notify you before proceeding with analysis if the sample temperature is outside of the range of 0.1-6.0°C. By not initialing this area, you allow the lab to proceed with analytical testing regardless of the sample temperature.

7	DATE	TIME	RECEIVED BY (SIGNATURE)	DATE	TIME
RELINQUISHED BY (SIGNATURE): Andrew Fetterolf	10/26/17	11:05			
RELINQUISHED BY (SIGNATURE)			RECEIVED BY (SIGNATURE)		
RELINQUISHED BY (SIGNATURE)			RECEIVED BY (SIGNATURE): [signature]	10/26/17	11:05

8 COMMENTS (FOR LAB USE ONLY)

SAMPLE TEMPERATURE UPON RECEIPT: 4 °C
CHILL PROCESS STARTED PRIOR TO RECEIPT: Y OR N
SAMPLE(S) RECEIVED ON ICE: Y OR N
PROPER BOTTLES RECEIVED IN GOOD CONDITION: Y OR N
BOTTLES FILLED WITH ADEQUATE VOLUME: Y OR N
SAMPLES RECEIVED WITHIN HOLD TIME(S): Y OR N
(EXCLUDES TYPICAL FIELD PARAMETERS)
DATE AND TIME TAKEN FROM SAMPLE BOTTLE

Appendix B

Boring Logs

LUST Incident No.: 20080255	Boring Number: B-3	Page 1 of 1
Site Name: Freedom Oil Company Address: 1406 N. Prospect Champaign, IL 61820	Boring Location: off-site, southeast of MW-1	Date: 10/24/17 Start 10:15 AM Finish 10:45 AM

Sample Number	Sample Device	Sample Recovery	Lithology Symbol	Depth (feet)	Detailed Soil and Rock Description	Natural Moisture Content %	Hand Penetrometer	OVA/PID/FID/OVM	Remarks
S-1 0-2.5	BS	75%	GW	1	gravel				
S-2 2.5-5	BS	100%	OL	2–4	silt, loam; black, moist, firm, no odor			4	
S-3 5-7.5	BS	100%	SC	5–6	silty clay; olive w/brown mottling, moist, firm, slight odor			49	
S-4 7.5-10	BS	100%	SC	7–9	stronger odor			257	
				10				1,018	

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

Groundwater Data

▼ Depth While Drilling 9'

▽ Depth After Drilling

Auger Depth 10' Rig Geoprobe

Rotary Depth 10' Geologist A. Fetterolf

Driller/Co Doug H./Reynolds

Note: Boring backfilled unless otherwise noted

Illinois Environmental Protection Agency

LUST Incident No.: 20080255	Boring Number: B-4	Page 1 of 1
Site Name: Freedom Oil Company Address: 1406 N. Prospect Champaign, IL 61820	Boring Location: off-site, South of MW-1	Date: 10/24/17 Start 11:00 AM Finish 11:30 AM

Sample Number	Sample Device	Sample Recovery	Lithology Symbol	Depth (feet)	Detailed Soil and Rock Description	Natural Moisture Content %	Hand Penetrometer	OVA/PID/FID/OVM	Remarks
S-1 0-2.5	BS	100%	GW	1	gravel				
S-2 2.5-5	BS	100%	OL	2–4	silt, loam; black, moist, firm, no odor			16 3	
S-3 5-7.5	BS	75%	SC	5–7	silty clay; olive w/brown mottling, moist, firm, slight odor			20	
S-4 7.5-10	BS	100%	SC	8–10				212	

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

Groundwater Data

▼ Depth While Drilling 10'

▽ Depth After Drilling

Auger Depth 10' Rig Geoprobe

Rotary Depth 10' Geologist A. Fetterolf

Driller/Co Doug H. / Reynolds

Note: Boring backfilled unless otherwise noted

Illinois Environmental Protection Agency

IL 532-2275
LPC 501 Rev June 2004

LUST Incident No.: 20080255	Boring Number: B-5	Page 1 of 1
Site Name: Freedom Oil Company Address: 1406 N. Prospect / Champaign, IL 61820	Boring Location: off-site, Southwest of MW-1	Date: 10/24/17 Start 11:45 AM Finish 12:15 PM

Sample Number	Sample Device	Sample Recovery	Lithology Symbol	Depth (feet)	Detailed Soil and Rock Description	Natural Moisture Content %	Hand Penetrometer	OVA/PID/FID/OVM	Remarks
0-2.5	BS	100%	GW	1	gravel			7	
				2	silt, loam; black, moist, firm, no odor				
2.5-5	BS	100%	OL	3				175	
				4					
5-7.5	BS	100%	SC	5	silty clay; olive w/brown mottling,				
				6	moist, firm, strong odor			1,183	
7.5-10	BS	100%	SC	7					
				8					
				9				396	
				10					

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

Groundwater Data

▼ Depth While Drilling 9'

▽ Depth After Drilling

Auger Depth 10' Rig Geoprobe

Rotary Depth 10' Geologist A. Fetterolf

Driller/Co Doug H. / Reynolds

Note: Boring backfilled unless otherwise noted

Illinois Environmental Protection Agency

IL 532-2275
LPC 501 Rev June 2004

LUST Incident No.: 20080255	Boring Number: B-6	Page 1 of 1
Site Name: Freedom Oil Company Address: 1406 N. Prospect / Champaign, IL 61820	Boring Location: vicinity of MW-3	Date: 10/24/17 Start 12:30 PM Finish 1:00 PM

Sample Number	Sample Device	Sample Recovery	Lithology Symbol	Depth (feet)	Detailed Soil and Rock Description	Natural Moisture Content %	Hand Penetrometer	OVA/PID/FID/OVM	Remarks
S-1 0-2.5	BS	50%	GW	1	gravel landscaping				
				2	silt, loam; black, moist, firm, no odor			18	
S-2 2.5-5	BS	100%	OL	3					
				4				248	
S-3 5-7.5	BS	100%	SC	5	silty clay; dark brown, moist,				
				6	firm, slight odor			118	
S-4 7.5-10	BS	100%	SC	7					
				8				58	
				9					
				10					

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

Groundwater Data

▼ Depth While Drilling 9

▽ Depth After Drilling

Auger Depth 10' Rig Geoprobe

Rotary Depth 10' Geologist A. Fetterolf

Driller/Co Doug H. / Reynolds

Note: Boring backfilled unless otherwise noted

Illinois Environmental Protection Agency

IL 532-2275
LPC 501 Rev June 2004

Appendix C

SWAP Database Maps

ArcGIS Web Map

2 / 7 / 2018 11 : 52 : 09 AM

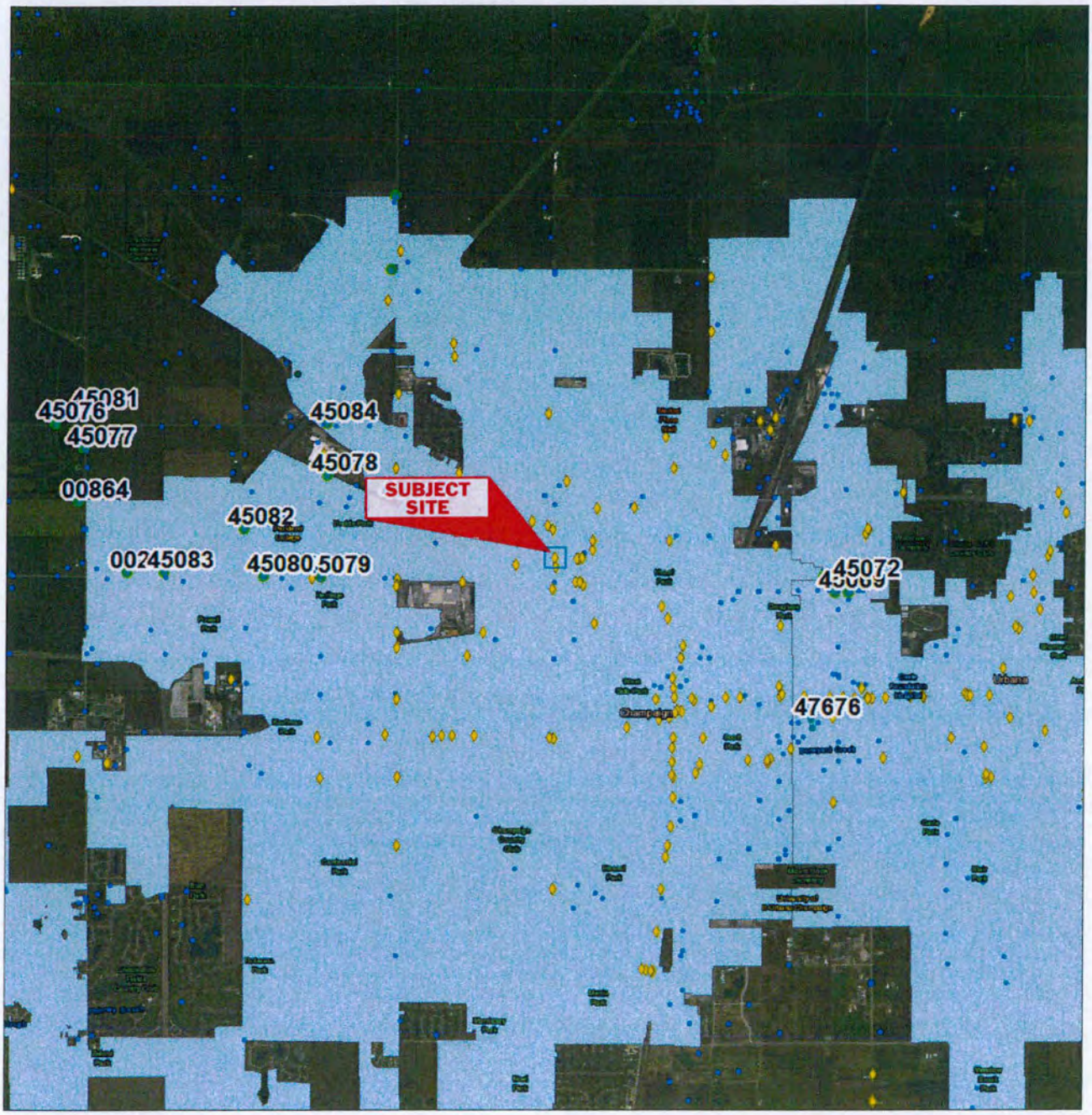
1:6,577

0 0.05 0.1 0.2 mi

0 0.05 0.1 0.2 km

- Leaking UST
- ISGS Database Wells
- CWS Wells
- CWS Wells Minimum Setback Zone
- CWS Wells Adopted Maximum Setback Zone
- Non-CWS Wells
- Leaking UST
- Counties

ArcGIS Web Map



2 / 7 / 2018 12 : 01 : 17 PM

1:52,614

0 0.5 1 2 mi

0 0.5 1 2 km

- CWS Wells with Well ID Labels
- Leaking UST
- ISGS Database Wells
- CWS Wells
- CWS Wells Minimum Setback Zone
- CWS Wells Adopted Maximum Setback Zone
- Non-CWS Wells
- Groundwater Ordinances
- Leaking UST
- Counties

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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User

Run Date :11/20/2008

DLC Assignment Form

Assignment ID :6513
Subject :Champaign/Former BP Service Staiton #5297
Subject Type :Ordinance Review
DLC In Date :11/20/2008
DLC File No. :
Correspondence No. :R08112001

DLC Completed Date. :

Assigned Staff:
Geving, Kim Attorney
Barrett, John Bureau Requestor

Project Details:
Status Issued Date: 11/20/2008 Due Date: 12/19/2008
Please review ordinance #2007-138 for Champaign

Comments:

CERTIFICATE

I, Glenda F. Robertson, duly Appointed, fully Qualified, and Deputy City Clerk of the City of Champaign, County of Champaign, State of Illinois, do hereby certify that the attached is a true and correct copy of Council Bill No. 2007-138 "An Ordinance Amending Chapter 16 of the Municipal Code, 1985, As Amended, by Adding Article III Entitled "Groundwater Restrictions" and Approving a Memorandum of Understanding with the Illinois Environmental Protection Agency (Health and Sanitation - Groundwater Restrictions)", approved on June 5, 2007 and covers the entire City of Champaign.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the City of Champaign, County of Champaign, State of Illinois this 23rd day of October, 2008.

Glenda F. Robertson
Deputy City Clerk

SEAL

CITY OF CHAMPAIGN, ILLINOIS
A HOME RULE MUNICIPAL CORPORATION

COUNCIL BILL NO. 2007-138

An Ordinance Amending Chapter 16 of the Municipal Code, 1985, As Amended, by Adding Article III Entitled "Groundwater Restrictions" and Approving a Memorandum of Understanding with the Illinois Environmental Protection Agency (Health and Sanitation - Groundwater Restrictions)

ADOPTED BY THE
CITY COUNCIL
OF THE
CITY OF CHAMPAIGN

THIS 5th DAY OF JUNE, 2007
Published in pamphlet form THIS 6TH DAY OF JUNE, 2007

COUNCIL BILL NO. 2007-138

AN ORDINANCE

AMENDING CHAPTER 16 OF THE MUNICIPAL CODE, 1985, AS AMENDED, BY ADDING ARTICLE III ENTITLED "GROUNDWATER RESTRICTIONS" AND APPROVING A MEMORANDUM OF UNDERSTANDING WITH THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
(Health and Sanitation - Groundwater Restrictions)

WHEREAS, certain properties in the City of Champaign, Illinois have been used over a period of time for commercial/industrial purposes; and

WHEREAS, because of said use, concentrations of certain chemical constituents in the groundwater beneath the City may exceed Class I groundwater quality standards for potable resource groundwater as set forth in 35 Illinois Administrative Code 620 or Tier 1 remediation objectives as set forth in 35 Illinois Administrative Code 742; and

WHEREAS, the City of Champaign desires to limit potential threats to human health from groundwater contamination while facilitating the redevelopment and productive use of properties that are the source of said chemical constituents;

NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF CHAMPAIGN, ILLINOIS, as follows:

Section 1. That Chapter 16 of the Champaign Municipal Code, 1985, as amended, entitled "Health and Sanitation," is hereby amended to add Article III, entitled "Groundwater Restriction Ordinance," which shall read as follows:

"ARTICLE III. GROUNDWATER RESTRICTION ORDINANCE

Sec. 16-20. Use of groundwater as a potable water supply prohibited.

(a) *Potable water* is any water used for human or domestic consumption, including, but not limited to, water used for drinking, bathing, swimming, washing dishes, or preparing foods.

(b) Except for such uses or methods in existence before the effective date of this ordinance, the use of, or attempt to use as a potable water supply groundwater from within the corporate limits of the City of Champaign by the installation or drilling of wells or by any other method is hereby prohibited, except at points of withdrawal by the City of Champaign.

(c) The City Engineer will notify the IEPA Bureau of Land of any proposed ordinance changes or requests for variance at least 30 days prior to the date the City is scheduled to take action on the proposed change or request.

(d) The City Engineer will maintain a registry of all sites within its corporate limits that have received "No Further Remediation" determinations from the IEPA.

(e) The City Engineer will review the registry of sites established under this section prior to siting public potable water supply wells within the area covered by this section.

(f) The City Engineer will determine whether the potential source of potable water has been or may be affected by contamination left in place at the sites tracked and reviewed under this section.

(g) The City Engineer will take action as necessary to ensure that the potential source of potable water is protected from contamination or treated before it is used as a potable water supply."

Section 2. That this ordinance shall be effective immediately, it being determined by the Council that it is urgent that this ordinance take effect at the earliest possible date.

Section 3. That the City Clerk is hereby directed to publish this Ordinance immediately after passage.

Section 4. That the Memorandum of Understanding with the Illinois Environmental Protection Agency (IEPA), in substantially the form as attached hereto and incorporated by reference herein as Exhibit "A", is hereby approved, and the City Manager is hereby authorized to sign said Memorandum of Understanding.

Section 5. Any person violating the provisions of this ordinance shall be fined an amount not to exceed $750.00 and in accordance with the general penalty provisions of the Code set forth in Section 1-21, 1-22, 1-23, and 1-24.

Section 6. All ordinances or parts of ordinances in conflict with this ordinance are hereby repealed insofar as they are in conflict with this ordinance.

Section 7. If any provision of this ordinance or this application to any person or under any circumstances is adjudged invalid, such adjudication shall not affect the validity of the ordinance as a whole or of any portion not adjudged invalid.

Section 8. This ordinance shall be in full force and effect from and after its passage, approval and publication as required by law.

COUNCIL BILL NO. 2007- 138

PASSED: June 5, 2007

APPROVED: _____
Mayor

ATTEST: _____
Deputy City Clerk

APPROVED AS TO FORM:

_____
City Attorney

J:\Leg\WORD\Public Works\Groundwater Ordinance CB With Legals Changes.Doc

MEMORANDUM OF UNDERSTANDING BETWEEN THE CITY OF CHAMPAIGN AND THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY REGARDING THE USE OF A LOCAL GROUNDWATER OR WATER WELL ORDINANCE AS AN ENVIRONMENTAL INSTITUTIONAL CONTROL

I. PURPOSE AND INTENT

A. This Memorandum of Understanding ("MOU") between the City of Champaign and the Illinois Environmental Protection Agency ("Illinois EPA") is entered into for the purpose of satisfying the requirements of 35 Ill. Adm. Code 742.1015 for the use of groundwater or water well ordinances as environmental institutional controls. The Illinois EPA has reviewed the groundwater or water well ordinance of June 5, 2007 (Attachment A) and determined that the ordinance prohibits the use of groundwater for potable purposes and/or the installation and use of new potable water supply wells by private entities but does not expressly prohibit those activities by the unit of local government itself. In such cases, 35 Ill. Adm. Code 742.1015(a) provides that the unit of local government may enter into an MOU with the Illinois EPA to allow the use of the ordinance as an institutional control.

B. The intent of this Memorandum of Understanding is to specify the responsibilities that must be assumed by the unit of local government to satisfy the requirements for MOUs as set forth at 35 Ill. Adm. Code 742.1015(i).

II. DECLARATIONS AND ASSUMPTION OF RESPONSIBILITY

In order to ensure the long-term integrity of the groundwater or water well ordinance as an environmental institutional control and that risk to human health and the environment from contamination left in place in reliance on the groundwater or water well ordinance is effectively managed, the City of Champaign hereby assumes the following responsibilities pursuant to 35 Ill. Adm. Code 742.1015(d)(2) and (i):

A. The City of Champaign will notify the Illinois EPA Bureau of Land of any proposed ordinance changes or requests for variance at least 30 days prior to the date the local government is scheduled to take action on the proposed change or request (35 Ill. Adm. Code 742.1015(i)(4));

B. The City of Champaign will maintain a registry of all sites within its corporate limits that have received "No Further Remediation" determinations in reliance on the ordinance from the Illinois EPA (35 Ill. Adm. Code 742.1015(i)(5));

C. The City of Champaign will review the registry of sites established under paragraph II. B. prior to siting public potable water supply wells within the area covered by the ordinance (35 Ill. Adm. Code 742.1015(i)(6)(A));

D. The City of Champaign will determine whether the potential source of potable water has been or may be affected by contamination left in place at the sites tracked and reviewed under paragraphs II. B. and C. (35 Ill. Adm. Code 742.1015(i)(6)(B)); and

E. The City of Champaign will take action as necessary to ensure that the potential source of potable water is protected from contamination or treated before it is used as a potable water supply (35 Ill. Adm. Code 742.1015(i)(6)(C)).

NOTE: Notification under paragraph II. A. above or other communications concerning this MOU should be directed to:

Manager, Division of Remediation Management
Bureau of Land
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, IL 62794-9276

III. SUPPORTING DOCUMENTATION

The following documentation is required by 35 Ill. Adm. Code 742.1015(i) and is attached to this MOU:

A. Attachment A: A copy of the groundwater or water well ordinance certified by the City Clerk or other official as the current, controlling law (35 Ill. Adm. Code 742.1015(i)(3));

B. Attachment B: Identification of the legal boundaries within which the ordinance is applicable (certification by city clerk or other official that the ordinance is applicable everywhere within the corporate limits; if ordinance is not applicable throughout the entire city or village, legal description and map of area showing sufficient detail to determine where ordinance is applicable) (35 Ill. Adm. Code 742.1015(i)(2));

C. Attachment C: A statement of the authority of the unit of local government to enter into the MOU (Council Resolution, code of ordinances, inherent powers of Mayor or other official signing MOU -- attach copies) (35 Ill. Adm. Code 742.1015(i)(1)).

IN WITNESS WHEREOF, the lawful representatives of the parties have caused this MOU to be signed as follows:

FOR: THE CITY OF CHAMPAIGN

BY: _____ DATE: 10-17-08
STEVEN C. CARTER, Its City Manager

APPROVED AS TO FORM:

_____
Assistant City Attorney

FOR: ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BY: _____ DATE: _____
Manager, Division of Remediation Management
Bureau of Land

Appendix D

Sampling Protocol

SOIL SAMPLING PROTOCOL

To be used when sampling L.U.S.T. site excavations for IEPA closure.

1. Sampling Methodology

   A. All sampling equipment to be used will be cleaned and decontaminated using deionized water prior to and between samples.

   B. Soil samples will be taken from excavation extents using a stainless steel trowel. The trowel will be inserted into the soil several inches so as to take a sample of undisturbed material. The sample will be immediately placed into a new, airtight, glass jar with a teflon lined lid.

   C. The sample will be allowed to sit undisturbed for a period of time sufficient for vapor equilibrium to be reached. A headspace analysis of the sample will then be conducted using a portable photoionization detector.

   D. Sampled extents showing contamination levels above 10 ppm on the PID will be continued. Sampled extents showing below 10 ppm.on the PID will be resampled for laboratory analysis.

2. Sample Storage and Transport

   A. Soil samples will be collected in new, airtight, glass jars* with teflon lined lids. Samples for analysis will be immediately cooled using a thermally insulated cooler and ice. The samples will be transported, on ice, as soon as possible, to the laboratory or to the engineering office cooler to await transport to the laboratory.

   B. No sample will be allowed to remain in the possession of the engineer or laboratory for more than two weeks prior to analysis.

   C. A chain of custody record will be kept for all samples taken for laboratory analysis.

3. Samples will be taken from the excavation sidewalls and floor at the following intervals.

   A. A minimum of one sample per twenty feet for sidewall extents. When lengths of sidewall exceed twenty feet, samples will be taken at equally spaced intervals, not to exceed twenty feet.

   B. Samples will be taken at a height relating to the projection of the lower one third of the former under ground storage tanks onto the sidewall extents. Samples will be taken at a distance relating to one-third the total excavation height from the floor if tank elevations are unknown.

C. A minimum of one sample per 400 square feet of excavation floor. Samples at minimum will be taken from the locations representing the bottoms of the former underground storage tanks.

D. Composited samples of excavated materials may also be taken for background reference and landfill verification.

*Encore sampling system will be substituted for glass jars when required.

SOIL SAMPLING PROTOCOL
For Subsurface Investigations

1. Sampling Methodology

   A. All sampling equipment to be used will be cleaned and decontaminated using deionized water prior to and between samples.

   B. Verification will be made that all boring equipment to include augers, sampling devices and associated equipment has been properly cleaned and decontaminated prior to initiating investigation.

   C. All boring and associated samplers will be decontaminated in accordance with the following schedule.

      1.) Augers and center plugs will be decontaminated between borings using a high pressure washer or steam cleaner.

      2.) Sampling devices will be decontaminated between samples using a warm water Alconox wash and triple rinsing.

   D. Samples representative of the interval retrieved will be removed and placed into new, glass jars with teflon lined lids*. Proper care will be taken to minimize volatilization of possible contaminants from the sample during handling.

   E. The sample will be allowed to sit undisturbed for a period of time sufficient for vapor equilibrium to be reached. A headspace analysis of the sample will then be conducted using a portable photoionizer detector.

   F. A log of all borings will be recorded during sampling. The logs will include data regarding soil types and depths, anomalies, odor, HNU readings, and moisture contents.

2. Sample Storage, Handling and Transport

   A. Samples for analysis will be immediately cooled using a thermally insulated cooler and ice. The samples will be transported, on ice, as soon as possible, to the laboratory or to the engineering office cooler to await transport to the laboratory.

   B. No sample will be allowed to remain in the possession of the geologist or laboratory for more than two weeks prior to analysis.

   C. A chain of custody record will be kept for all samples taken for laboratory analysis.

*Encore sampling system will be substituted for glass jars when required.

SOIL SAMPLING PROTOCOL

1. Sampling Methodology - Shelby Tube Samples

   A. All sampling equipment to be used will be cleaned and decontaminated using deionized water prior to and between samples.

   B. Verification will be made that all boring equipment to include augers, shelby tube samplers and associated equipment has been properly cleaned and decontaminatdd prior to initiating investigation.

   C. All boring and associated samplers will be decontaminated in accordance with the following schedule.

      1.) Augers and center plugs will be decontaminated between borings using a high pressure washer or steam cleaner.

      2.) Shelby tube samplers will be inspected prior to use. No samplers will be used showing indications of damage, corrosion or contamination. Samplers will not be reused or washed in the field.

   D. Shelby tube samplers will be carefully removed to minimize sample disturbance and volatilization or contamination.

   E. Plastic end caps will immediately be placed on the shelby tubes as they are removed.

2. Sample Storage, Handling, & Transport

   A. Shelby tube samples will be placed in a thermally insulated cooler with ice or cooler packs (Blue Ice).

   B. No sample will be allowed to remain in the possession of the engineer or laboratory for more than two weeks prior to analysis.

   C. A chain of custody record will be kept for all samples taken for laboratory analysis.

   D. No samples will be removed from the Shelby tubes except by the laboratory performing analysis.

GROUNDWATER SAMPLING PROTOCOL

To be used when sampling groundwater monitoring wells for IEPA approved investigations.

1. Sampling Methodology - Bailer Method

   A. Verification will be made that all sampling equipment to include bailers, buckets, chords, water level meters, have been properly decontaminated prior to sampling initiation.

   B. All equipment will be decontaminated in accordance with the following protocol:

      1.) Bailers will be decontaminated between samples using Alconox wash, a 30% methanol/distilled water rinse, and a final triple rinse with distilled water.

      2.) Water level probes and associated equipment will be decontaminated between readings using an Alconox wash and distilled water rinse.

      3.) A new section of line will be used for bailing and sampling each individual well.

   C. A record of the following will be made at the time of well sampling:

      1.) Depth to water from top of well casing.
      2.) Total well depth from top of well casing.
      3.) Total vertical feet of water in well.
      4.) Number of well volumes purged.
      5.) Number of gallons purged.
      6.) Sampling methods.
      7.) Sample appearance.

   D. Wells will be purged and sampled using the following method:

      The total vertical feet of water in the 2" ID monitor well will be multiplied by 0.163 gal./ft. in order to determine the total volume of water in the well. A total of three well volumes will be purged from the well. Groundwater samples will then be withdrawn via a stainless steel bailer and collected in 40 milliliter, properly labeled vials. The samples will be immediately placed on ice for temporary storage until the samples can be transported to an IEPA certified laboratory.

SOIL SAMPLING PROTOCOL

TO BE USED WHEN SAMPLING L.U.S.T. SITE EXCAVATIONS

1. Sampling Methodology & Decontamination Procedures

   A. All sampling equipment to be used will be decontaminated using an alconox wash and distilled water rinse prior to and between samples.

   B. Soil samples will be collected from excavation extents using a stainless steel trowel. The trowel will be inserted into the soil several inches so as to collect an undisturbed sample. The sample will be immediately placed into a new, airtight, glass jar with a teflon lined lid*.

Representative grab samples will be collected along excavation sidewalls at a minimum of one sample per twenty feet of sidewall. When sidewall lengths exceed twenty feet, additional sidewall representative samples will be collected. Sidewall samples will be collected from an area parallel to the lower one-third of the tank.

Representative sampling of the excavation floor will require a minimum of two grab samples to be collected in areas representing the tank invert ends. If excavation floor extents exceed 400 square feet, additional representative samples will be collected at a minimum of one sample per additional 400 square feet.

If a release has occurred along product distribution lines, representative grab samples will be collected from below areas where distribution lines were previously located. These samples will be collected at twenty foot intervals.

2. Sample Storage and Transport

   A. Samples will be immediately placed on ice in an insulated cooler and chilled to 4 Celsius. Samples will be transported on ice to an IEPA certified laboratory as soon as possible.

   B. A chain of custody record will be kept for all laboratory analyzed samples.

*Encore sampling system will be substituted for glass jars when required.

SOIL SAMPLING PROTOCOL

HAND AUGER

To be used when sampling hand augered soil borings for subsurface investigations.

1. Sampling Methodology - Hand Auger Sampling

   A. All sampling equipment to be used will be cleaned and decontaminated using deionized water prior to and between samples.

   B. Verification will be made that all boring equipment has been properly cleaned and decontaminated prior to initiating investigation.

   C. All boring equipment will be decontaminated as follows:

      Auger sample cores, attachable stems, and any additional sampling aids (e.g.. knives, trowels, etc....) will be decontaminated between sampling intervals using an Alconox wash , methanol rinse, and triple distilled water rinsing.

   D. Samples representative of the interval retrieved will be removed and placed into new, glass jars with teflon lined lids. Proper care will be taken to minimize volatilization of possible contaminants from the sample during handling.

   E. The sample will be allowed to sit undisturbed for a period of time sufficient for vapor equilibrium to be reached. A headspace analysis of the sample will then be conducted using a portable photoionizer detector.

   F. A log of all borings will be recorded during sampling. The logs will include data regarding soil types and depths, anomalies, odor, HNU readings, blow counts and moisture contents.

2. Sample Storage, Handling and Transport

   A. Samples for analysis will be immediately cooled using a thermally insulated cooler and ice. The samples will be transported, on ice, as soon as possible, to the laboratory or to the engineering office cooler to await transport to the laboratory.

   B. No sample will be allowed to remain in the possession of the engineer or laboratory for more than two weeks prior to analysis.

   C. A chain of custody record will be kept for all samples taken for laboratory analysis.

SOIL GAS SAMPLING PROTOCOL

1. Soil gas samples will be collected from a depth at least three feet below the ground surface or building foundation, but above the saturated zone.

2. No soil gas sampling will take place within 48 hours after a rainfall event of ½ inch or greater, in standing or ponded water areas and where soil is constantly watered by an irrigation system.

3. Utilities will be identified to assess possible man-made pathways.

4. A direct push method will be used to advance a heavy-gauge decontaminated steel probe, with an expendable tip, to the desired depth. Once the desired depth (greater than three feet below ground surface or building foundation) is reached, 1/8 to ¼ inch outside diameter post-run tubing of either Teflon® or nylon will be connected to the expendable point holder.

5. The rod will be pulled up three to six inches to create a cavity to collect the soil gas sample. The rod will be sealed at the surface with bentonite to prevent air from entering around the rod.

6. The tubing will be purged of three volumes prior to the collection of the soil gas sample.

7. Isopropyl alcohol tracer gas (or another tracer gas or other leak apparatus detection system approved by the Illinois EPA) will be used during the sampling to confirm there are no leaks around the soil gas sampling train.

8. Tedlar bags and Summa canisters, will be certified clean by the laboratory prior to sample collection.

9. The holding times for soil gas samples are no more than 30 days for Summa canisters and no more than 48 hours for Tedlar bags. The soil gas sample will be submitted to the laboratory for analysis within the allowed holding time under chain of custody to TekLab, Inc, an accreditted laboratory.

Appendix E

Corrective Action Plan Budget

General Information for the Budget and Billing Forms

LPC#: 0910105433 County: Champaign

City: Champaign Site Name: Freedom Oil Company

Site Address: 1406 North Prospect

IEMA Incident No: 20080255

IEMA Notification Date: 2/25/2008

Date this form was prepared: February 26, 2018

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

- [ ] Budget Proposal
- [X] Budget Amendment (Budget Amendments must include only the costs over the previous budget.)
- [ ] Billing Package

Please provide the name(s) and date(s) of report(s) documenting the costs as requested:

Name(s): _____

Date (s): _____

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

35 Ill. Adm. Code 734:

- [ ] Early Action
- [ ] Free Produce Removal After Early Action
- [ ] Site Investigation.....Stage 1: [ ] Stage 2: [ ] Stage 3: [ ]
- [X] Corrective Action

35 Ill. Adm. Code 732:

- [ ] Early Action
- [ ] Free Produce Removal After Early Action
- [ ] Site Classification
- [ ] Low Priority Corrective Action
- [ ] High Priority Corrective Action

35 Ill. Adm. Code 731

- [ ] Site Investigation
- [ ] Corrective Action

General Information for the Budget and Billing Forms

The following address will be used as the mailing address for checks and any final determination letters regarding payment from the Fund.

Pay to the order of: Freedom Oil Company

Send in care of: Midwest Environmental Consulting and Remediation Services, Inc.

Address: 22200 Illinois Route 9, P.O. Box 614

City: Tremont State: IL Zip: 61568

The payee is the: Owner: [X] Operator [X] (Check one or both)

W-9 must be submitted.

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

Click here to print off a W-9 Form.

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

Number of incidents reported to the IEMA for this site: 1

Incidents Numbers assigned to the site due to releases from USTs: 20080255 _____, _____, _____

Please list all tanks that have ever been located at the site and tanks that are presently located at the site.

Product Stored in UST	Size (gallons)	Did UST have a release?	Incident No.	Type of Release Tank Leak / Overfill / Piping Leak
diesel fuel	6,000	Yes [X] No [ ]	20080255	overfills/spills
gasoline	10,000	Yes [X] No [ ]	20080255	overfills/spills
gasoline	6,000	Yes [X] No [ ]	20080255	overfills/spills
gasoline	6,000	Yes [X] No [ ]	20080255	overfills/spills
gasoline	2,000	Yes [X] No [ ]	20080255	overfills/spills
diesel fuel	10,000	Yes [ ] No [X]	N/A	N/A
gasoline	8,000	Yes [ ] No [X]	N/A	N/A
gasoline	12,000	Yes [ ] No [X]	N/A	N/A
		[ ] [ ]		
		[ ] [ ]		
		[ ] [ ]		

Budget Summary

Chose the applicable regulation: ● 734 ○ 732

734	Free Product	Stage 1 Site Investigation	Stage 2 Site Investigation	Stage 3 Site Investigation	Corrective Action
Drilling and Monitoring Well Costs Form					$0.00
Analytical Costs Form					$9,333.79
Remediation and Disposal Costs Form					$92,463.50
UST Removal and Abandonment Costs Form					$0.00
Paving, Demolition, and Well Abandonment Costs Form					$0.00
Consulting Personnel Costs Form					$31,878.08
Consultant's Materials Costs Form					$1,472.00
Handling Charges Form	Handling charges will be determined at the time a billing package is submitted to the Illinois EPA. The amount of allowable charges will be determined in accordance with the Handling Charges Form.				
Total					$135,147.37

Analytical Costs Form

Laboratory Analysis	Number of Samples		Cost ($) per Analysis		Total per Parameter
Chemical Analysis					
BTEX Soil with MTBE	21	x	$107.44	=	$2,256.24
BTEX Water with MTBE	9	x	$102.39	=	$921.51
COD (Chemical Oxygen Demand)		x	$32.71	=	$0.00
BTEX Water with MTBE EPA 8260		x	$16.36	=	$0.00
Flash Point or Ignitability Analysis EPA 1010		x	$35.99	=	$0.00
Fraction Organic Carbon Content (f_{oc}) ASTM-D 2974-00		x	$41.44	=	$0.00
Fat, Oil, & Grease (FOG)		x	$65.43	=	$0.00
LUST Pollutants Soil - analysis must include volatile, base/ neutral, polynuclear aromatics and metals list in Section 732. Appendix B and 734. Appendix B.		x	$755.72	=	$0.00
Dissolved Oxygen (DO)		x	$26.17	=	$0.00
Paint Filter (Free Liquids)		x	$15.27	=	$0.00
PCB / Pesticides (combination)		x	$37.08	=	$0.00
PCBs		x	$165.76	=	$0.00
Pesticides		x	$165.76	=	$0.00
pH		x	$15.27	=	$0.00
Phenol		x	$37.08	=	$0.00
Polynuclear Aromatics PNAs Soil	21	x	$192.14	=	$4,034.94
Polynuclear Aromatics PNAs Water	9	x	$192.14	=	$1,729.26
Reactivity		x	$181.04	=	$0.00
SVOC - Soil (Semi-Volatile Organic Compounds)		x	$341.33	=	$0.00
SVOC - Water (Semi-Volatile Organic Compounds)		x	$341.33	=	$0.00
TKN (Total Kjeldahl) "nitrogen"		x	$47.98	=	$0.00
TPH (Total Petroleum Hydrocarbons)		x	$133.04	=	$0.00
VOC (Volatile Organic Compound) - Soil (Non-Aqueous)		x	$190.84	=	$0.00
VOC (Volatile Organic Compound) - Water		x	$184.29	=	$0.00
		x		=	$0.00
		x		=	$0.00
		x		=	$0.00
		x		=	$0.00
		x		=	$0.00
Geo-Technical					
Bulk Density (p_b) ASTM D4292 / D2937		x	$23.99	=	$0.00
Ex-Situ Hydraulic Conductivity / Permeability		x	$278.08	=	$0.00
Moisture Content (w) ASTM D2216-90 / D4643-87		x	$13.09	=	$0.00
Porosity		x	$32.71	=	$0.00
Rock Hydraulic Conductivity Ex-Situ		x	$381.67	=	$0.00
Sieve / Particle Size Analysis ASTM D422-63 / D1140-54		x	$158.12	=	$0.00
Soil Classification ASTM D2488-90 / D2487-90		x	$74.15	=	$0.00
Soil Particle Density (p_s) ASTM D854-92		x		=	$0.00
		x		=	$0.00
		x		=	$0.00
		x		=	$0.00

Analytical Costs Form

Metals Analysis					
Soil preparation fee for Metals Soil TCLP (one fee per soil sample)		x	$86.15	=	$0.00
Soil preparation fee for Metals Total Soil (one fee per soil sample)		x	$17.45	=	$0.00
Water Preparation fee for Metals in Water (one fee per water sample)		x	$12.00	=	$0.00
Arsenic TCLP Soil		x	$17.45	=	$0.00
Arsenic Total Soil		x	$17.45	=	$0.00
Arsenic Water		x	$19.63	=	$0.00
Barium TCLP Soil		x	$10.90	=	$0.00
Barium Total Soil		x	$10.90	=	$0.00
Barium Water		x	$13.09	=	$0.00
Cadmium TCLP Soil		x	$17.45	=	$0.00
Cadmium Total Soil		x	$17.45	=	$0.00
Cadmium Water		x	$19.63	=	$0.00
Chromium TCLP Soil		x	$10.90	=	$0.00
Chromium Total Soil		x	$10.90	=	$0.00
Chromium Water		x	$13.09	=	$0.00
Cyanide TCLP Soil		x	$30.53	=	$0.00
Cyanide Total Soil		x	$37.08	=	$0.00
Cyanide Water		x	$37.08	=	$0.00
Iron TCLP Soil		x	$10.90	=	$0.00
Iron Total Soil		x	$10.90	=	$0.00
Iron Water		x	$13.09	=	$0.00
Lead TCLP Soil		x	$17.45	=	$0.00
Lead Total Soil		x	$17.45	=	$0.00
Lead Water		x	$19.63	=	$0.00
Mercury TCLP Soil		x	$20.72	=	$0.00
Mercury Total Soil		x	$10.90	=	$0.00
Mercury Water		x	$28.35	=	$0.00
Selenium TCLP Soil		x	$17.45	=	$0.00
Selenium Total Soil		x	$17.45	=	$0.00
Selenium Water		x	$16.36	=	$0.00
Silver TCLP Soil		x	$10.90	=	$0.00
Silver Total Soil		x	$10.90	=	$0.00
Silver Water		x	$13.09	=	$0.00
Metals TCLP Soil (a combination of all RCRA metals)		x	$112.32	=	$0.00
Metals Total Soil (a combination of all RCRA metals)		x	$102.51	=	$0.00
Metals Water (a combination of all RCRA metals)		x	$129.77	=	$0.00
Other					
EnCore Sampler, purge-and-trap sampler or equivalent sampling device	21	x	$12.64	=	$265.44
Sample Shipping per sampling event[1]	2	x	$63.20	=	$126.40

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

Total Analytical Costs: **$9,333.79**

Remediation and Disposal Costs Form

A. Conventional Technology

Excavation, Transportation, and Disposal of contaminated soil and/or the 4-foot backfill material removal during early action activities:

Number of Cubic Yards	Cost per Cubic Yard ($)	Total Cost
950	$72.05	$68,447.50

Backfilling the Excavation:

Number of Cubic Yards	Cost per Cubic Yard ($)	Total Cost
950	$25.28	$24,016.00

Overburden Removal and Return:

Number of Cubic Yards	Cost per Cubic Yard ($)	Total Cost
		$0.00

B. Alternative Technology

Alternative Technology Selected:	
Number of Cubic Yards of Soil to Be Remediated	
Total Non-Consulting Personnel Costs Summary Sheet ($	
Total Remediation Materials Costs Summary Sheet ($)	
Total Cost of the System	

Remediation and Disposal Costs Form

C. Groundwater Remediation and/or Free Product Removal System

Total Non-Consulting Personnel Costs Summary Sheet ($)	
Total Remediation Materials Costs Summary Sheet ($)	
Total Cost of the System	

D. Groundwater and/or Free Product Removal and Disposal

☐ Subpart H minimum payment amount applies.

Number of Gallons	Cost per Gallon ($)	Total Cost ($)
		$0.00

E. Drum Disposal

☐ Subpart H minimum payment amount applies.

Number of Drums of Solid Waste	Cost Per Drum ($)	Total Cost ($)
Number of Drums of Liquid Waste	Cost Per Drum ($)	Total Cost ($)
Total Drum Disposal Costs		$0.00

Total Remediation and Disposal Costs:	**$92,463.50**

Consulting Personnel Costs Form

Employee Name	Personnel Title*	Hours	Rate *	Total $
Remediation Category	**Task**			
Allan Green	Senior Project Manager	30.00	$126.40	**$3,792.00**
CCAP/CCAP-Budget	feasibility setup, status, scheduling, update, planning			
Andrew Fetterolf	Project Manager	80.00	$113.76	**$9,100.80**
CCA-Field	fieldwork/excavation oversight,sample prep			
Allan Green	Senior Project Manager	30.00	$126.40	**$3,792.00**
CCAP/CCAP-Budget	project management reporting, costs and budget tracking			
Allan Green	Senior Project Manager	10.00	$126.40	**$1,264.00**
CCAP/CCAP-Budget	corrective action plan and budget review			
Allan Green	Senior Project Manager	30.00	$126.40	**$3,792.00**
CCAP/CCAP-Budget	project planning for remediation activities, retain contractors, negotiate contracts			
Andrew Fetterolf	Project Manager	20.00	$113.76	**$2,275.20**
CCAP/CCAP-Budget	excavation planning			
Andrew Fetterolf	Senior Scientist	16.00	$107.44	**$1,719.04**
CCA-Field	purge and sample monitoring wells, sample prep			
Penny Silzer	Senior Prof. Geologist	6.00	$139.05	**$834.30**
CCAP-Budget/CA reimb	CA report/reimb. review and certification			
Gaye Lynn Green	Senior Admin. Assistant	6.00	$56.88	**$341.28**
CCAP-Budget/CACR/CA reimb	format, finalize, copy and bind all reports, correspondence, filing			
Gaye Lynn Green	Senior Acct. Technician	6.00	$69.51	**$417.06**
CCAP-Budget/CACR/CA reimb	CA reimbursements, billing, invoices			
Andrew Fetterolf	Project Manager	40.00	$113.76	**$4,550.40**
CCAP/CCAP-Budget	prepare amended corrective action plan and budget/prepare results report			

*Refer to the applicable Maximum Payment Amounts document.

Total of Consulting Personnel Costs	**$31,878.08**

Consultant's Materials Costs Form

Consulting Materials Costs:

Materials, Equipment, or Field Purchases	Time or Amount Use	Rate ($)	Units	Total Cost
Remediation Category	**Description/Justification**			
Company Vehicle Mileage	1440.00	$0.55	/mile	**$792.00**
CA-Field	eight site visits:mobilization to & from site for excavation/groundwater sampling			
Photoionization Detector	8.00	$75.00	/day	**$600.00**
CA-Field	field screening of samples			
Well Sampling Equipment	2.00	$25.00	/day	**$50.00**
CA-Field	monitoring well sampling supplies;purge pump, gloves, tubing, bottles, bailers, etc.			
Postage		$30.00	total	**$30.00**
CA	as needed for report preparation and mailing			
				$0.00
				$0.00
				$0.00
				$0.00

Total Consultant's Material's Costs: $1,472.00

Owner/Operator and Licensed Professional Engineer/Geologist Budget Certification Form

I hereby certify that I intend to seek payment from the UST Fund for costs incurred while performing corrective action activities for Leaking UST incident 20080255. 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, and no costs exceed Subpart H: Maximum Payment Amounts, Appendix D Sample Handling and Analysis amounts, and Appendix E Personnel Titles and Rates of 35 Ill. Adm. Code 732 or 734. I further certify that costs ineligible for payment from the Fund pursuant to 35 Ill. Adm. Code Section 732.606 or 734.630 are not included in the budget proposal or amendment. Such ineligible costs include but are not limited to:

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

Owner/Operato Freedom Oil Company

Authorized Representative: Mr. Mark Eckhoff Title: V.P., Store Operations

Signature: Date: 3-9-18

Subscribed and sworn to before me the 9th day of March, 2018.
(Budget Proposals and Budget Amendments must be notarized when the certification is signed.)

Gaye Lynn Green (Notary Public)

Seal: OFFICIAL SEAL GAYE LYNN GREEN NOTARY PUBLIC - STATE OF ILLINOIS MY COMMISSION EXPIRES:05/18/21

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In addition, I certify under penalty of law that all activities that are the subject of this plan, budget or report were conducted under my supervision or were conducted under the supervision of another Licensed Professional Engineer or Licensed Professional Geologist and reviewed by me; that this plan, budget, or report and all attachments were prepared under my supervision; that, to the best of my knowledge and belief, the work described in the plan, budget or report has been completed in accordance with the Environmental Protection Act [415 ILCS5], 35 Ill. Adm. Code 732-734, and generally accepted standards and practices of my profession; and that the information presented is accurate and complete. I am aware there are significant penalties for submitting false statements or representations to the Illinois EPA, including but not limited to fines, imprisonment, or both as provided in Sections 44 and 57.17 of the Environmental Protection Act [415 ILCS 5/44 and 57.17].

L.P.E./L.P.G.: Penny Silzer L.P.E./L.P.G. Seal: LICENSED PROFESSIONAL GEOLOGIST PENNY L. SILZER NO. 196-000256 ILLINOIS

L.P.E./L.P.G. Signature: Date: 3/9/18

Subscribed and sworn to before me the 9th day of March, 2018.

Gaye Lynn Green (Notary Public)

Seal: OFFICIAL SEAL GAYE LYNN GREEN NOTARY PUBLIC - STATE OF ILLINOIS MY COMMISSION EXPIRES:05/18/21

The Illinois EPA is authorized to require this information under 415 ILCS 5/1. Disclosure of this information is required. Failure to do so may result in the delay or denial of any budget or payment requested hereunder.

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

CERTIFIED MAIL - RECEIPT REQUESTED #7008 0150 0003 4726 7673

August 7, 2008

Freedom Oil Company
814 W. Chestnut St.
Bloomington, IL 61701

In Re: Facility No. 4-016556
IEMA Incident No. 08-0255.
Freedom Oil #32
1406 N. Prospect
Champaign, Champaign Co., IL

Dear Applicant:

The Reimbursement Eligibility and Deductible Application received on July 3; 2008 for the above referenced occurrence has been reviewed. The following determinations have been made based upon our review.

It has been determined that you are eligible to seek payment of costs in excess of $10,000. The costs must be in response to the occurrence referenced above and associated with the following tanks:

Eligible Tanks

Tank 1 6,000 gallon Diesel Fuel
Tank 2 10,000 gallon Gasoline
Tank 3 6,000 gallon Gasoline
Tank 4 6,000 gallon Gasoline
Tank 5 2,000 gallon Gasoline

You must contact the Illinois Environmental Protection Agency to receive a packet of Agency billing forms for submitting your request for payment.

An owner or operator is eligible to access the Underground Storage Tank Fund if the eligibility requirements are satisfied:

1. Neither the owner nor the operator is the United States Government,

2. The tank does not contain fuel which is exempt from the Motor Fuel Tax Law,

3. The costs were incurred as a result of a confirmed release of any of the following substances:

"Fuel", as defined in Section 1.19 of the Motor Fuel Tax Law

Aviation fuel

Heating oil

Kerosene

Used oil, which has been refined from crude oil used in a motor vehicle, as defined in Section 1.3 of the Motor Fuel Tax Law.

4. The owner or operator registered the tank and paid all fees in accordance with the statutory and regulatory requirements of the Gasoline Storage Act.

5. The owner or operator notified the Illinois Emergency Management Agency of a confirmed release, the costs were incurred after the notification and the costs were a result of a release of a substance listed in this Section. Costs of corrective action or indemnification incurred before providing that notification shall not be eligible for payment.

6. The costs have not already been paid to the owner or operator under a private insurance policy, other written agreement, or court order.

7. The costs were associated with "corrective action".

This constitutes the final decision as it relates to your eligibility and deductibility. We reserve the right to change the deductible determination should additional information that would change the determination become available. An underground storage tank owner or operator may appeal the decision to the Illinois Pollution Control Board (Board), pursuant to Section 57.9 (c) (2). An owner or operator who seeks to appeal the decision shall file a petition for a hearing before the Board within 35 days of the date of mailing of the final decision, (35 Illinois Administrative Code 105.102(a) (2)).

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, Illinois 60601
(312) 814-3620

The following tanks are also listed for this site:

Tank 6 10,000 gallon Diesel Fuel
Tank 7 8,000 gallon Gasoline
Tank 8 12,000 gallon Gasoline

Your application indicates that there has not been a release from these tanks under this incident number. You may be eligible to seek payment of corrective action costs associated with these tanks if it is determined that there has been a release from one or more of these tanks. Once it is determined that there has been a release from one or more of these tanks you may submit a separate application for an eligibility determination to seek corrective action costs associated with this/these tanks.

If you have any questions, please contact our Office at (217) 785-1020 or (217) 785-5878.

Sincerely,

Deanne Lock
Administrative Assistant
Division of Petroleum and Chemical Safety

cc: IEPA
Facility File