OFFICE OF PUBLIC UTILITIES
CITY OF SPRINGFIELD, ILLINOIS

JAMES O. LANGFELDER, MAYOR
ENVIRONMENTAL HEALTH & SAFETY

January 11, 2018

Ex. 36

Illinois Environmental Protection Agency
Bureau of Water
Attn. Darin LeCrone, Acting Manager
Permit Section
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Dear Mr. LeCrone

This letter is to inform you that City Water, Light & Power (CWLP) intends to cease sampling the complete groundwater parameter lists from 35 Illinois Administrative Code Part 620.410 (a) Inorganic Chemical Constituents and (b) Organic Chemical Constituents, starting in the first quarter of 2018. As you know, CWLP has been voluntarily sampling these lists quarterly since the third quarter of 2011. On April 17, 2015 (effective October 19, 2015), USEPA finalized 40 CFR Part 257 Subpart D – Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments (CCR) rule.

In accordance with the CCR rule, CWLP has been and will continue to sample groundwater at our landfill and ash impoundments in accordance with our CCR Ground Water Monitoring Program, which includes Appendix III to Part 257 constituents (boron, calcium, chloride, fluoride, pH, sulfate, and total dissolved solids (TDS)) and Appendix IV to Part 257 constituents (antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, fluoride, lead, lithium, mercury, molybdenum, selenium, thallium, and radium 226 and 228 combined).

The CCR Appendix III constituents have been chosen by USEPA since they are known to be leading indicators of releases of contaminants associated with coal combustion residuals and the USEPA strongly recommends that State Directors add these constituents to the list of indicator parameters to be monitored during detection monitoring of groundwater (Federal Register/Vol. 80, No. 74/Friday, April 17, 2015/Rules and Regulations, page 21342).

CWLP appreciates your understanding in this matter in order to streamline regulatory requirements. It is our understanding that the Board is still developing 35 Illinois Administrative

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Code Part 841 Coal Combustion Waste (CCW) Ash and Surface Impoundments at Power Generating Facilities, once finalized CWLP will also diligently follow this regulation.

If you should have any questions or require further information, please feel free to contact me at your convenience at (217) 757-8610.

Sincerely,

P.J. Becker
Environmental Health and Safety Manager

cc: Bill Buscher, Groundwater Section
Deborah Williams, CWLP
Sue Corcoran, CWLP
Eric Staley, CWLP