

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

AUG 17 2009

STATE OF ILLINOIS
Pollution Control Board

DETREX CORPORATION,)
Petitioner,)
)
v.)
)
ILLINOIS ENVIRONMENTAL PROTECTION)
AGENCY,)
Respondent.)

PCB 10- 16
(Permit Appeal - Land)
(90-Day Extension)

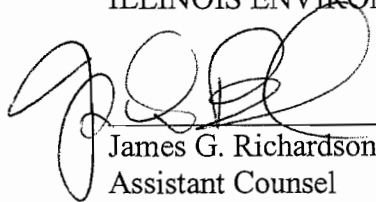
NOTICE

John Therriault
Assistant Clerk
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601-3218

Neal H. Weinfield
Greenberg Traurig, LLP
77 West Wacker Drive, Suite 2500
Chicago, Illinois 60601

PLEASE TAKE NOTICE that I have today caused to be filed a REQUEST FOR NINETY DAY EXTENSION OF APPEAL PERIOD with the Illinois Pollution Control Board, copies of which are served upon you.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY


James G. Richardson
Assistant Counsel

Dated: August 12, 2009
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
217/782-5544

THIS FILING IS SUBMITTED ON RECYCLED PAPER

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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DETREX CORPORATION,)
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PCB No. 10- 16
(Permit Appeal - Land)
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**REQUEST FOR NINETY DAY EXTENSION
OF APPEAL PERIOD**

NOW COMES the Respondent, the Illinois Environmental Protection Agency ("Illinois EPA"), by one of its attorneys, James G. Richardson, Assistant Counsel, and, pursuant to Section 40(a)(1) of the Illinois Environmental Protection Act (415 ILCS 5/40(a)(1)) and 35 Ill. Adm. Code 105.208, hereby requests that the Illinois Pollution Control Board ("Board") grant an extension of the thirty-five (35) day period for petitioning for a hearing to November 23, 2009, or any other date not more than a total of one hundred twenty-five (125) days from the date of receipt of the Illinois EPA's final decision. In support thereof, the Illinois EPA respectfully states as follows:

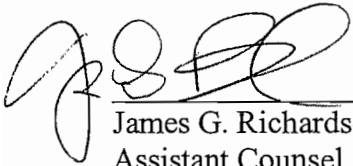
1. On July 9, 2009, the Illinois EPA issued a final decision to the Petitioner.
2. On August 7, 2009, the Petitioner made a written request to the Illinois EPA for an extension of time by which to file a petition for review, asking the Illinois EPA to join in requesting that the Board extend the thirty-five day period for filing a petition by ninety days. Upon information and belief the Petitioner did receive the final decision on July 21, 2009.

3. The additional time requested by the parties may eliminate the need for a hearing in this matter or, in the alternative, allow the parties to identify issues and limit the scope of any hearing that may be necessary to resolve this matter.

WHEREFORE, for the reasons stated above, the parties request that the Board, in the interest of administrative and judicial economy, grant this request for a ninety-day extension of the thirty-five day period for petitioning for a hearing.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in black ink, appearing to read 'JGR', is written over a horizontal line.

James G. Richardson
Assistant Counsel

Dated: August 12, 2009

1021 North Grand Avenue, East
P.O. Box 19276
Springfield, Illinois 62794-9276
217/782-5544
217/782-9143 (TDD)

THIS FILING IS SUBMITTED ON RECYCLED PAPER



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-2829
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

DOUGLAS P. SCOTT, DIRECTOR

217/524-3300

July 9, 2009

Certified Mail
7008 1140 0004 7343 2013

Mr. David Craig
Detrex Corporation
P.O. Box 5111
Southfield, Michigan 48086-5111

Re: 0311860003 -- Cook County
Detrex Corporation Solvent & Environmental Services
ILD074424938
Received: December 24, 2007; May 8, 2008; October 3, 2008; June 5, 2009
Log No.: B-113R-CA-8 and 9
Permit CA
RCRA - Permit

Dear Mr. Craig:

This is in response to the following four documents: (1) "Request for Meeting to Discuss Detrex Corporation Facility Located at 2537 LeMoyne Avenue in Melrose Park, Illinois", dated December 19, 2007; (2) "Phase III Summary of Environmental Conditions Report", dated May 5, 2008; (3) "Additional Information for the Detrex Corporation Facility", dated October 2, 2008; and (4) "Updated Water Well Survey Text, Table, and Figures", dated May 12, 2009. These documents were submitted by Dr. Betty Locey of ARCADIS G&M of Michigan, LLC on behalf of Detrex Corporation (Detrex). The documents were submitted to address the corrective action required in the above-referenced facility's RCRA Part B Renewal Permit, issued on October 9, 2003 (Log No. B-113R).

Detrex's December 2007 submittal contained information regarding investigative results at the facility and requested a meeting to discuss the corrective action activities for the facility based on the previous activities and the information provided in the December 2007 submittal. A meeting was held between Detrex and Illinois EPA on February 5, 2008 to discuss the December 2007 submittal. During this meeting it was agreed that Detrex would submit a comprehensive corrective action report to Illinois EPA, which: (1) summarizes and evaluates the results of the RFI Phase III activity and previous corrective action effort; and (2) discusses the facility's plan to complete RCRA corrective action at on and off-site properties.

As agreed during the February 5, 2008 meeting, Detrex submitted the May 2008 Phase III Summary of Environmental Conditions Report, which included the results of RCRA Facility Investigation (RFI) Phase III soil and groundwater investigation conducted at the facility and the proposed Tier 2/3

Mr. David Craig
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evaluations of remedial objectives for the subject facility. Subsequently, as requested by Illinois EPA, the October 2, 2008 and the May 12, 2009 documents were submitted to Illinois EPA as addendums to the Phase III Summary of Environmental Conditions Report.

The four submittals mentioned and discussed above were reviewed as requests to modify the RCRA corrective action program at the Detrex facility in Melrose Park, Illinois and are hereby approved with following conditions and modifications:

1. Section 1 of the May 2008 report indicates that the facility's goals are to achieve: (1) Closure of the RCRA Permit; (2) a No Further Action (NFA) for the site; and (3) No Further Remediation (NFR) or Environmental Land Use Conditions (ELUCs) as appropriate for off-site properties. Illinois EPA has following comments:
 - a. Use of an environmental land use control (ELUC) is one of the remedial options accepted by 35 Ill. Adm. Code 742: Tiered Approaches to Corrective Action Objectives (TACO) to eliminate an exposure pathway(s) by establishing restrictions on a property, which may include, but not limited to: industrial/commercial land use, an engineered barrier, access controls, groundwater use restrictions, a worker safety caution/plan, and/or use of site-specific remedial objectives.
 - b. Any ELUC to be established for a property through Illinois EPA's corrective action program must be approved by Illinois EPA prior to being recorded with the appropriate governmental office.
 - c. Upon the completion of RCRA corrective action at the site and any affected off-site properties, Detrex will receive a No Further Action (NFA) letter regarding the RCRA corrective action for the four (4) former solid waste management units (SWMUs) required corrective action by the facility's RCRA Permit. This NFA determination is for the four SWMUs and any contamination discovered while undergoing RCRA corrective action; however it doesn't address any other potential contamination or environmental contamination that may exist within the property.
 - d. Upon completion of RCRA corrective action at an off-site property, of which the contamination was originated from Detrex facility, Illinois EPA will issue a letter for the subject off-site property to indicate that the specific area of the property and the contamination associated with release from Detrex was remediated in accordance with Section 742 (TACO). However, note that this letter will not be a comprehensive No Further Remediation (NFR) letter for the property, as it only addresses a specific contamination and its affected area.

- e. As for the "Closure of Permit", the facility must meet all the requirements of Section II.H of its RCRA Permit.
2. It appears as though Detrex has adequately characterized the soil contamination at this site.
3. Based on the site-specific conditions and IEPA's further evaluation of the data presented in the subject report, Illinois EPA has determined that the following site specific Soil Saturation Limits (C_{sat}) for TCE and PCE are approved *for the Detrex property only*:

Trichloroethene (TCE) = 1767 mg/kg (surface soil; above 1-m bgs)
2550 mg/kg (subsurface soil; below 1-m bgs)

Tetrachloroethene (PCE) = 425 mg/kg (surface soil)
436 mg/kg (subsurface soil)

1,1,1-trichloroethane (1,1,1-TCA) = 1570 mg/kg (surface soil)*
2240 mg/kg (subsurface soil)*

**Default soil property values for silt are used*

Note that, as you are aware, the recent proposed amendments to the TACO regulations included various modifications, including addition of Indoor inhalation exposure route to the risk evaluation in TACO. Thus, it is highly recommended that the facility meet the default C_{sat} requirement recent proposed amendments to TACO as shown below:

C_{sat} (mg/kg)	Outdoor Inhalation	GW Migration	Indoor Inhalation
PCE	800	310	290
111-TCA	1300	670	560
TCE	1200	650	520

4. If the facility disagrees with the C_{sat} values in Condition 3 above, the facility may choose to conduct additional evaluation. However, unless new additional field data, collected from appropriate sampling locations and depth pre-approved by Illinois EPA, is provided to Illinois EPA to modify the site-specific values, the following site-specific values for f_{oc} , the facility must utilize following values for the f_{oc} :

f_{oc} (surface soil) = 0.0086

f_{oc} (subsurface soil) = 0.013

5. At this time, Illinois EPA has determined that the soil attenuation capacity requirements of 35 Ill. Adm. Code 742.215 have been met. However, this determination may need to be re-evaluated if any new data indicates otherwise.
6. The concentration of 1,1,1-TCA detected at the facility meets the site-specific C_{sat} requirement. However, 1,1,1-TCA is still a consistent of concern for this facility and the surrounding properties. Any new analytical data to be collected must include this compound.
7. The facility's request to exclude the groundwater pathway in accordance with 35 Ill. Adm. Code 742.925 cannot be approved at this time. In accordance with Section 742.305 and 320, until the soils exceeding the site-specific C_{sat} values for TCE and PCE are remediated to below the C_{sat} , none of exposure pathways can be eliminated.
8. The investigation data and the evaluation of the soil and groundwater contamination in the on- and off-site properties included in the subject Phase III Report and the additional information submitted in October 2008 identified some highly contaminated areas (for TCE only) at the facility and off-site properties. Figures 5 thru 7 in Attachment 1 of the October 2008 submittal show the potential distribution of TCE in soil at three different subsurface elevations (the typical ground-surface elevation at Detrex facility is approximately 632.5'): 630', 620' and 610'. These figures show the facility's interpolation of the data collected to date and may not represent the accurate/actual field condition. However, the locations of the high concentrations of TCE shown in the figures are likely sources of the soil and groundwater contamination in the area.

Based on the data provided in the subject submittals, the following areas of soil contamination associated/possibly associated with former releases and operation at the Detrex facility are identified below (Attachment D to this letter is a site map showing the locations of these areas):

- a. Soil contamination in the northern portion of the Detrex facility extending to the surrounding off-site areas (Area A);
- b. Soil contamination in the Loading Dock Area (Area B), which extends out west to the Outback property;
- c. Soil contamination in the vicinity of Outback Building, just west of Detrex property (Area C). Please note that this contamination may have originated from the Loading Dock Area (Area B) at Detrex;
- d. Soil contamination between Detrex Facility and Handy Button Facility along the LeMoyne Avenue (Area D);

- e. Soil contamination in the Handy Button Property along LeMoyne Avenue (Area E);
and
 - f. Area just East of Detrex Building in LaMantia Property (associated with Area B).
9. The facility must submit a corrective measure (CM) plan to address/remediate the areas identified in Condition 8 above. As indicated in Condition 7 above, any soils exceeding the site-specific C_{sat} limits must be remediated to at least below the C_{sat} levels (the actual remediation level is dependent on the procedures/requirements associated with developing remediation objectives for this project in accordance with 35 Ill. Adm. Code 742). The CM requirements for the Detrex facility is included in the Attachment D.3 of the facility's afore-mentioned RCRA Part B Renewal Permit. The CM plan must satisfy the requirements included in the permit. In addition, the following information must also be included:
- a. A scaled site map showing the facility and the neighboring properties and their property boundaries. (each property must be clearly identified);
 - b. A scaled site map with the areas of soil contamination above the remedial objectives ;
 - c. A scaled site map with the areas of C_{sat} exceedance (at on- and off-site properties);
 - d. A scaled figure(s), which includes on-site and off-site properties showing: (1) the areas where Detrex intends to remediate; and (2) the contaminated areas found during the RFI where Detrex does not intend to remediate. An explanation to Item (2) based on the actual data collected to-date must be accompanied for each area surrounding the Detrex facility.
 - e. An estimate of the extent and the volume of contamination present in soil above applicable remedial objectives for the project;
 - f. Detailed descriptions and technical background and specification information for chosen remedial method(s), which should include pros and cons of utilizing the remedial method(s);
 - g. Time schedule and cost estimate for the proposed remedial activity and reporting;
 - h. Goals and objectives of the proposed remedial efforts;
 - i. Criteria for evaluation of the outcome of the remedial efforts; and

- j. If a pilot study of one or more remedial option is proposed, then detailed technical information applicable to this project regarding all selected methods/options must be provided.
10. As you know, the proposed amendments to the TACO regulations included many changes to the current regulations. Specifically, the modifications proposed which will affect the direction of the Detrex corrective action project include (but not limited to):
- a. Addition of the indoor-Inhalation exposure route evaluation for soil and groundwater concentrations;
 - b. Changes in the Tier 1 remediation objectives; and
 - c. Soil saturation limits (C_{sat}) for three different exposure routes for COCs for this site: outdoor-inhalation, migration to groundwater; and indoor-inhalation.

Due to the fact that: (1) concentrations of the TCE and other COCs are extremely high; (2) contamination has migrated to off-site properties; and (3) indoor inhalation exposure is an immediate concern at this facility and off-site areas, although it is not required at this time, it is recommended that the facility will develop a corrective measure (CM) plan to address the contaminations to meet the requirements of the proposed amendments to the TACO.

11. For the off-site properties that require remedial action, the default Tier 1 C_{sat} must be met, unless the Owner(s) of the property decides to place an ELUC to utilize TACO Tier2/Tier3 evaluation in accordance with TACO regulations. Site-specific parameters such as organic carbon fraction of soil must be confirmed to be accurate to be used for the off-site properties.
12. The following comments are made regarding the Proposed Remediation Objectives for Detrex site:
- a. Industrial Commercial Land Use: All remedial objectives are based on the industrial or commercial land use. This restriction must be included in an environmental land use control (ELUC) for the facility and the appropriate surrounding properties.
 - b. Inhalation/ingestion (outdoor) exposure routes: It was proposed that these exposure routes be eliminated due to the fact that all affected areas are currently covered either by concrete or asphalt. As these are proposed to be an "engineered barrier" to the contaminated soil beneath, the requirements of 742.1000 must be met. In addition, an appropriate ELUC will also have to be established.

- c. Soil Component of Groundwater Ingestion Exposure route: This exposure route cannot be eliminated in accordance with 35 Ill. Adm. Code Section 742.320 until all the requirements of that section are met. Once the requirements are met, then the use of the City of Melrose Park Ordinance #321 as an institutional control to eliminate groundwater ingestion exposure route may be proposed in accordance with 35 Ill. Adm. Code 742 Subpart J.
 - d. Potential Indoor Inhalation Exposure Route: This exposure route will be of concern with the concentrations of contaminants in the soil and groundwater found at this facility. In the subject report, the facility conducted a preliminary assessment comparing the results of the soil sampling with the proposed Tier 1 ROs for the indoor inhalation exposure route with TACO. The preliminary evaluation indicated that the levels of contaminants remain in the vicinity of the facility and surrounding properties exceeded the draft ROs for the industrial/commercial land use. See Condition 14 below for more comment on this exposure route.
13. The facility proposes to establish engineered barriers to eliminate the pathway for the ingestion and inhalation exposure routes. As stated in Condition 12 above, it appears that the facility intends to utilize the existing building and the paved area at the site as the engineered barrier. It must be noted that in order to utilize the existing structures as engineered barrier, all the pavement and the structures must be thoroughly inspected for any cracks or defects by a licensed structural engineer in the state of Illinois. Furthermore, the engineered barrier must be properly maintained in a future.
 14. For indoor inhalation exposure pathway, the analytical data was compared to the draft remedial objectives for this exposure route in the subject submittal, which have not been formally approved by the Illinois Pollution Control Board (IPCB). However, by comparison, the levels of COCs in soil and groundwater may pose threat to the indoor air and will be likely to be concern for this facility and surrounding areas. The proposed regulations are being drafted at this time and the draft regulations to be included in TACO is expected to be available in the near future. As such, it is highly recommended that the facility should initiate the remedial option for the facility and any affected off-site locations regarding this exposure route.
 15. It was demonstrated that the soil contamination in the northeastern portion of LaMantia property and the southeastern portion of U.S. Postal Service is unlikely to be associated with the soil contamination identified in the Detrex facility. However, the groundwater contamination in the vicinity of this area maybe associated to the contamination from Detrex.
 16. The Illinois EPA cannot concur with the facility interpretation of the horizontal extent of groundwater contamination, as depicted on Figure 4 of the Additional Information dated

October 2, 2008. The facility must define the extent of groundwater contamination with actual data points where contaminants of concern (COCs) are not exceeding 35 Ill. Adm. Code, Part 620, Class II Groundwater Quality Standards (GQSs), instead of modeling or estimating the extent of the plume.

17. The following additional sampling locations are required to better define the extent of groundwater contamination:
 - a. A minimum of three (3) groundwater samples are required to determine the actual extent of current groundwater contamination north of SWMU 3. Groundwater samples must be collected north of the railway at the following locations: (1) northwest of MW-1; (2) near BH-44; and (3) northeast of MW-2.
 - b. A current sample southeast of SWMU 3, collected at or near BH-38.
 - c. If current conditions indicate the groundwater levels exceed Class II GQSs at any of the locations required by Conditions 17.a and 17.b above, more investigation locations may be necessary to determine the extent of contamination.
 - d. The samples required by Conditions 17.a and 17.b above must be obtained before the facility can further pursue excluding the groundwater pathway. The groundwater sampling locations may be collected from temporary piezometers; however, once the extent of groundwater has been defined, permanent monitoring wells may be required.

18. The Illinois EPA concurs that there are likely off-site sources of contamination that are not attributable to Detrex, and the groundwater contaminant plumes cannot be differentiated based on available data. Therefore, groundwater contamination has been delineated for all COCs at the following locations:
 - a. Groundwater has been defined to the extent practicable to the south with monitoring wells MW-03, MW-04, and MW-07.
 - b. Monitoring well MW-8 defines the extent of groundwater contamination to the east.
 - c. Monitoring well MW-10 is adequate to define the extent of contamination to the west.

19. The Illinois considers the vertical extent of contamination defined to the extent practicable. This decision is based on: (1) the hydrogeologic properties of the Silt and Clay Unit; (2) the boring logs included within Appendix G, which indicate the unit becomes stiff and dry with depths of approximately 17 feet bgs and deeper; and (3) the uppermost aquifer is up to 48 feet thick within the investigation area.

20. The facility must maintain monitoring wells MW-1 through MW-10 to allow for collection of groundwater samples from the uppermost aquifer. The facility must implement a routine groundwater monitoring program, and report all monitoring and analytical data in accordance with the schedule listed below:

- | | | |
|----|---|---|
| a. | Samples to be Collected During <u>the Months of</u> | Results Submitted to the Illinois EPA <u>by the Following</u> |
| | Second Quarter | July 15 |
| | Fourth Quarter | January 15 |
- b. The Illinois EPA concurs with the proposed site-specific COCs: benzene; chloroethane; chloroform; 1,1-dichloroethane; 1,1-dichloroethene; cis-1,2-dichloroethene; tetrachloroethene; 1,1,1-trichloroethane; trichloroethene; and vinyl chloride. All groundwater samples must be analyzed and compared to the approved Class II GQSs. An isoconcentration map must be created based on the results of the groundwater analysis.
- c. The facility must determine the groundwater surface elevations at each well at the time groundwater is sampled in accordance with Condition 20.a. A potentiometric groundwater surface map must be created based on the groundwater elevations collected.
- d. The facility must submit a completed "RCRA Facility Groundwater, Leachate and Gas Reporting Form" (LPC 592) as a cover sheet for any notices or reports required by this letter for identification purposes. Only one (1) copy of the LPC 592 must accompany your submittal. However, the facility must submit one (1) original and (excluding the groundwater monitoring results submitted in an electronic format) a minimum of two (2) copies of each notice or report you submit to the Illinois EPA. The form is included as Attachment B.
- e. Information required by Conditions 20.a through 20.d must be submitted in an electronic format. The information is to be submitted as fixed-width text files formatted as found in Attachment C to this letter, in accordance with the schedule found in Condition 20.a above. Additional guidance regarding the submittal of the information in an electronic format can be found at www.epa.state.il.us/land/regulatory-programs/permits-and-management/index.html.

- f. The facility must report the information required by Conditions 20.a through 20.e in accordance with the schedule listed in Condition 20.a above, to the address listed below:

Stephen F. Nightingale, P.E.
Illinois Environmental Protection Agency
Bureau of Land -- #33
Permit Section
Post Office Box 19276
Springfield, Illinois 62794-9276

21. Groundwater monitoring must continue at a minimum until such time that remediation of soils has been achieved below C_{sat} levels. The facility must have Illinois EPA approval before the monitoring program can cease.
22. If free product is encountered during sampling or remediation activities, corrective action must be proposed, for Illinois EPA review and approval, for the removal of free product and contaminated groundwater.
23. Once the vertical and horizontal extent of contamination have been defined, as reviewed and approved by the Illinois EPA, the facility must establish a Groundwater Management Zone in accordance with 35 Ill. Adm. Code 620.250, and the Illinois EPA guidance document, "Establishing a Groundwater Management Zone at RCRA Facilities" (October 12, 2001). This guidance can be found electronically at the following Illinois EPA's website; <http://www.epa.state.il.us/land/regulatory-programs/permits-and-management/establishing-groundwater-management-zone.html>.
24. Based on an average of slug test values provided on Table 5 in Volume 1 of the subject submittal dated May 6, 2008, the average hydraulic conductivity value of 5.29E-07 cm/sec must be used when applicable.
25. The groundwater requirements of the May 22, 2007 Illinois EPA letter (Log No. B-113-CA-6 & 7) have been satisfied.
26. As indicated by Mr. Stan Miles of Detrex during August 2008, the facility is in process of collecting the soil-gas samples at Outback property, located just west of the Detrex property. For any future field activity, it is recommended that the facility should submit a workplan for Illinois EPA's review and approval. Any field activities and investigation must be conducted in accordance with the technical guidance provided by USEPA, ASTM, ITRC or other acceptable professional organizations. All soil gas samples must be analyzed using a National Environmental Laboratory Accreditation Program (NELAP) certified laboratory.

27. In general, when collecting soil gas samples, at a minimum, the followings should be followed during sample collection:
 - a. Use rigid-wall tubing made of nylon or Teflon (or other equivalent material);
 - b. Use gas-tight, insert containers to hold the sample;
 - c. Purge three volumes before obtaining each discrete soil gas sample;
 - d. Use a tracer of isopropyl alcohol or other equivalent leak compound;
 - e. Limit the flow rate to 200 ml/min; and
 - f. Soil gas sample shall be collected at a depth of 5 feet below ground surface.
28. A completed and original RCRA Corrective Action Certification form must accompany all submittals associated with this project. To allow for proper review and distribution of all information submitted to Illinois EPA, the original document and two copies (a total of **three complete sets**) must be submitted to Illinois EPA.
29. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.
30. Quality assurance/quality control procedures which meet the requirements of SW-846 must be implemented during all required sampling/analysis efforts. In addition, sample collection, handling, preservation, preparation and analysis must be conducted in accordance with the procedures set forth in SW-846 and the requirements set forth in this letter.
31. All Corrective Action activities at this facility must meet the requirements of 35 Ill. Adm. Code 724.201 and 742.
32. Except as modified herein, RCRA corrective action activities at this facility must be carried out in accordance with: (1) 35 Ill. Adm. Code 724 and 742; (2) the facility's RCRA Permit; and (3) Illinois EPA letters regarding such activities.

Mr. David Craig
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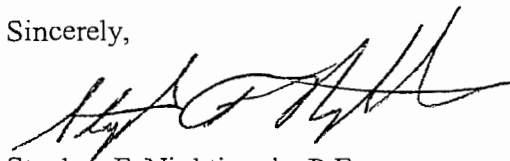
33. A completed and original RCRA Corrective Action Certification form must accompany all submittals associated with this project. To allow for proper review and distribution of all information submitted to Illinois EPA, the original document and two copies must be submitted to Illinois EPA.

This action shall constitute Illinois EPA's final action on the subject submittal. Within 35 days after the date of mailing of Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Work required by this letter, your submittal(s) or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This letter does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Should you have any questions regarding the groundwater aspects of this project, please contact Amy Boley at 217/558-4716; questions regarding other aspects of this project should be directed to Takako Halteman at 217/524-3274.

Sincerely,



Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land

SFN:TNH/mls/092024s.doc

Attachment: ^{jen AMB TDN} A -- Site Map
B -- RCRA Facility Groundwater, Leachate and Gas Reporting Form (LPC-952)
C -- Electronic Reporting Form
D -- Soil TCE Contamination Distribution Map at 620'

Attachment B

RCRA Facility Groundwater, Leachate, and Gas Reporting Form (LPC 592)



Illinois
Environmental
Protection Agency

Bureau of Land
1021 North Grand Avenue East
Box 19276
Springfield, IL 62794-9276

RCRA FACILITY GROUNDWATER, LEACHATE AND GAS REPORTING FORM

This form must be used as a cover sheet for the notices and reports, identified below as required by: (1) a facility's RCRA interim status closure plan; (2) the RCRA interim status regulations; or (3) a facility's RCRA permit. All reports must be submitted to the Illinois EPA's Bureau of Land Permit Section. This form is for use by Hazardous Waste facilities only. Reporting for Solid Waste facilities should be submitted on a separate form. All reports submitted to the Illinois EPA's Bureau of Land Permit Section must contain an original, plus a minimum of two copies.

Note: This form is not to be used with permit or closure plan modification requests. The facility's approved permit or closure plan will state whether the document you are submitting is required as a report or a modification request.

Facility Name: _____ Site ID #: _____
Facility Address: _____ Fed ID #: _____

Check the appropriate heading. Only one heading may be checked for each corresponding submittal. Check the appropriate sub-heading, where applicable. Attach the original and all copies behind this form.

- | | | |
|--|--------------------------------------|--|
| <input type="checkbox"/> LPC-160 Forms | | |
| <input type="checkbox"/> <u>Groundwater</u> | | <input type="checkbox"/> <u>Leachate</u> |
| <input type="checkbox"/> Quarterly – Indicate one: 1 2 3 4 | | <input type="checkbox"/> Quarterly – Indicate one: 1 2 3 4 |
| <input type="checkbox"/> Semi-Annual | | <input type="checkbox"/> Semi-Annual |
| <input type="checkbox"/> Annual | | <input type="checkbox"/> Annual |
| <input type="checkbox"/> Biennial | | <input type="checkbox"/> Biennial |
|
 | | |
| <input type="checkbox"/> Groundwater Data (without LPC-160 Forms) | | |
| <input type="checkbox"/> Quarterly – Indicate one: 1 2 3 4 | | |
| <input type="checkbox"/> Annual | <input type="checkbox"/> Semi-Annual | <input type="checkbox"/> Biennial |
|
 | | |
| <input type="checkbox"/> Well Construction Information | | |
| <input type="checkbox"/> Well Construction Forms, Boring Logs and/or Abandonment Forms | | |
| <input type="checkbox"/> Well Survey Data (e.g., Stick-up Elevation Data) | | |
|
 | | |
| <input type="checkbox"/> Notice of Statistically Significant Evidence of Groundwater Contamination
(35 Ill. Adm. Code 724.198) | | |
|
 | | |
| <input type="checkbox"/> Notice of Exceedence of Groundwater Concentration Limit (35 Ill. Adm. Code 724.199(h)) | | |
|
 | | |
| <input type="checkbox"/> Notice of Alternate Source or Error in Sampling Analysis or Evaluation of Groundwater
(35 Ill. Adm. Code 724.199(i)) | | |
|
 | | |
| <input type="checkbox"/> Gas Monitoring Reports | | |
|
 | | |
| <input type="checkbox"/> Other (identify) _____ | | |

Attachment C
Electronic Reporting Form

**Formatting Requirements for the 01 Record of the Electronically Submitted
Groundwater and Leachate Data (the 01 Record portion of the LPC-160 is included
for example purposes)**

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM**

Page 1 of _____

RECORD
CODE
L P C S M O I
1 2 3 4 5 6 7

TRANS
CODE
A
8

REPORT DUE DATE ____/____/____
36 M D Y 41

FEDERAL ID NUMBER _____

SITE INVENTORY NUMBER _____ 9 18	MONITOR POINT NUMBER _____ (see Instructions) 19 22
REGION _____ CO. _____	DATE COLLECTED ____/____/____ 23 M D Y 28
FACILITY NAME _____	

FOR IEPA USE ONLY
LAB _____ 29
DATE RECEIVED ____/____/____ 42 M D Y 47

BACKGROUND SAMPLE (X) _____ TIME COLLECTED ____:____:____
54 (24 Hr. Clock) 55 11 M 58

UNABLE TO COLLECT SAMPLE _____
(see Instructions) 59

MONITOR POINT SAMPLED BY _____
(see Instructions) 60 OTHER (SPECIFY) _____

SAMPLE FIELD FILTERED — INORGANICS (X) _____ ORGANICS (X) _____
61 62

SAMPLE APPEARANCE _____
63

COLLECTOR COMMENTS _____
103

LAB COMMENTS _____
150

199

IL 532 1213
LPC 160 01/90

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 ½, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to \$25,000 for each day the failure continues a fine up to \$1,000.00 and imprisonment up to one year. This form has been approved by the Forms Management Center.

All analytical procedures must be performed in accordance with the methods contained in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods," SW-846, 3rd Edition, September 1986 or equivalent methods approved by the Agency. Proper sample chain of custody control and quality assurance/quality control procedures must be maintained in accordance with the facility sampling and analysis plan.

*Only Keypunch with Data in Column 35 or Columns 38-47

KEY:

<u>Spaces Numbered</u>	<u>Description</u>	<u>Format</u>
Spaces 1-7	Record Code	LPCSM01
Space 8	Trans Code	A
Spaces 9-18	Site ID	0000000000
Spaces 19-22	Mon Pt ID	G000
Spaces 23-28	Date Collected	000000
Space 29	Lab	
Spaces 30-35	Filler	
Spaces 36-41	Report Due Date	000000
Spaces 42-47	Date Received	000000
Spaces 48-53	Filler 2	
Space 54	Background Sample	
Spaces 55-58	Time Collected	0000
Space 59	Unable to Collect Sample	
Space 60	Monitoring Point Sampled By	
Space 61	Field Filtered – Inorganic	
Space 62	Field Filtered – Organic	
Spaces 63-102	Sample Appearance	
Spaces 103-142	Collector Comments	
Spaces 143-149	Filler 3	
Spaces 150-199	Lab Comments	

**Formatting Requirements for the 02 Record of the Electronically Submitted
Groundwater and Leachate Data (the 02 Record portion of the LPC-160 is included
for example purposes)**

RECORD CODE | L | P | C | S | M | O | 2 |
1 7

TRANS CODE | A | (COLUMNS 9-29 FROM ABOVE)
8

	<u>FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE</u>	<u>STORET NUMBER</u>	<u>Remarks See Inst.</u>	<u>Replicate</u>	<u>< or ></u>	<u>VALUE</u>
Q	TEMP OF WATER (unfiltered °F)	0 0 0 1 1 30 34				38 47
Q	SPEC COND (unfiltered umhos)	0 0 0 9 4				
Q	pH (unfilted units)	0 0 4 0 0				
Q	ELEV OF GW SURF (ft ref MSL)	7 1 9 9 3				
Q	DEPTH OF WATER (ft below LS)	7 2 0 1 9				
A	BTM WELL ELEV (ft ref MSL)	7 2 0 2 0				
Q	DEPTH TO WATER FR MEA PT (ft)	7 2 1 0 9				

IL 532 1213
LPC 160 01/90

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*Only Keypunch with Data in Column 35 or Columns 38-47

KEY:

Spaces Numbered

Description

Format

Spaces 1-7

Record Code

LPCSM02

Space 8

Trans Code

A

Spaces 9-18

Site ID

0000000000

Spaces 19-22

Mon Pt ID

Spaces 23-28

Date Collected

Space 29

Lab

Spaces 30-34

STORET Number

Space 35

Remarks

Space 36

Replicate

Space 37

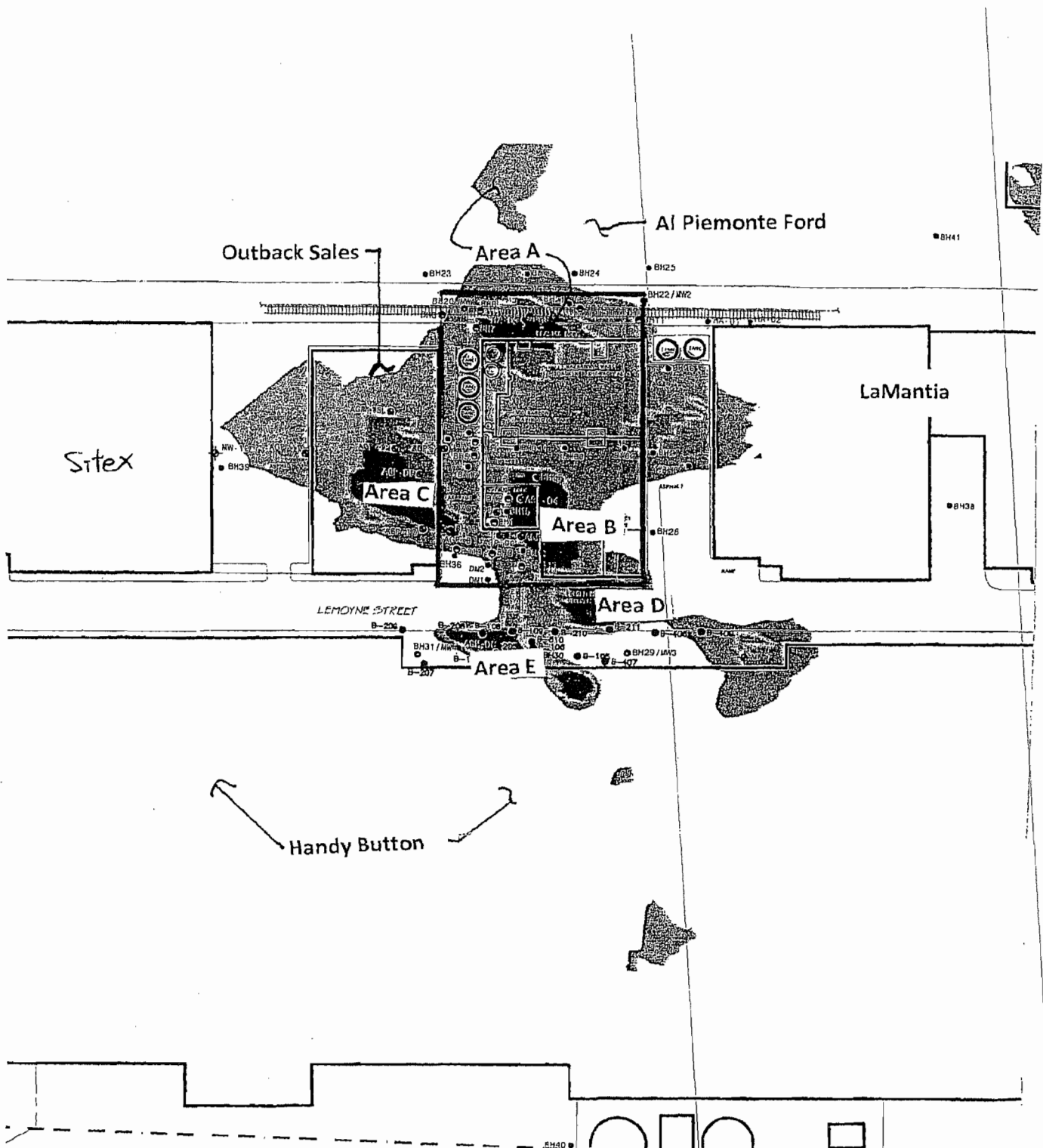
< or >

Space 38-47

Value

Attachment D

Soil TCE Contamination Distribution Map at 620'

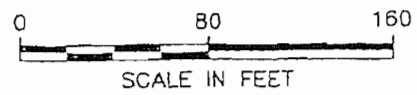


In $\mu\text{g}/\text{kg}$

	TCE = 500,000
	TCE > 100,000
	TCE > 1,000



- Detrex Corp. Facility



Attachment D
Soil TCE Contamination
Distribution Map at 620'
 Detrex Corp Facility
 B-113R

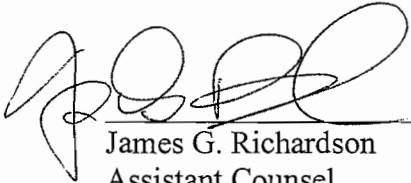
CERTIFICATE OF SERVICE

I, the undersigned attorney at law, hereby certify that on August 12, 2009 I served true and correct copies of a REQUEST FOR NINETY DAY EXTENSION OF APPEAL PERIOD by first class mail of the United States Postal Service upon the persons as follows:

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Assistant Clerk
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Chicago, Illinois 60601-3218

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