



June 1, 2011

Mr. Greg Dunn
Voluntary Site Remediation Unit B
Remedial Project Management Section
Division of Remediation Management
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**Subject: Remedial Action Plan (RAP) Addendum
Former Manufactured Gas Plant
Champaign, IL
State ID 0190100008**

Dear Greg:

Ameren Illinois is providing this addendum to the remedial action plan (RAP) to address project modifications to the originally submitted RAP document dated December 2008, entitled *Remedial Action Plan – Former Manufactured Gas Plant, Champaign, Illinois – State ID 0190100008*.

Current Excavation Activities

The excavation of the former Manufactured Gas Plant (MGP) related impacts have been completed to date in eight of the proposed nine phases. Each phase has been performed within a tent structure where any potential vapor from the excavation is filtered through external carbon units before being discharged to the atmosphere. PSC and Environmental Operations Inc. (EOI) are currently excavating Phase 9.

Excavation was completed to within approximately 20 feet of the site boundary. A 20-foot perimeter was maintained around the site boundary to ensure the stability of the tent structure and for worker safety during excavation.

Proposed Excavation

This proposed revision provides for the additional excavation of impacted soils (0-to 3-foot depth) around the inside perimeter of the former MGP site that could not be excavated beneath the tent structure. The proposed areas of excavation are shown in Figure 1. The excavation and backfill areas shown numerically are for field sequencing only.

Based on sidewall confirmatory sampling performed during the excavation activities, concentrations of MGP constituents still exist that exceed Tier 1 or site specific Tier 2 ROs outside the phased excavation limits. In order to remediate the 0-to 3-foot depth zone for the ingestion and inhalation pathways, PSC proposes to excavate the top three feet in the areas that were not addressed during the tent phased excavations. This zone will be excavated "open air" and therefore a tent will not be utilized. The use of the tent is not feasible in these areas adjacent to the property line, nor is it necessary. The contaminants of concern in the proposed excavation area are primarily PAHs with limited VOCs. Table 1 shows the results of previous excavation sidewall samples in the areas that we are proposing for open-air excavation. Nevertheless, we will take appropriate precautions in the event that VOCs are encountered. During the excavations, any potential vapors will be monitored "real-time" by an on-site health and safety officer. This data will be recorded on daily air monitoring reports. If vapors or odors are above action-levels, PSC will utilize a spray-on cover material to minimize potential vapor migration off-site.

Proposed Sampling and Backfilling

PSC will also be backfilling the excavation following additional confirmatory sampling of the sidewalls. This sampling will further aid in the determination of soil plume delineation. Samples collected will be submitted for analysis for only the constituents that previously exceeded a Tier 1 or Tier 2 RO. Backfilling will include the reuse of previously placed and compacted CA-6 crushed stone.

In order to facilitate the overall site restoration and site grading, the backfilling of the perimeter excavations will be only backfilled with one foot of on-site crushed stone. The upper two feet will be backfilled using one-and a-half feet of clean clay and six inches of clean topsoil. Soil samples will be collected and analyzed to verify that the clay and topsoil meet the IEPA requirements of clean fill material.

If you have any questions or require further information, please feel free to contact me.

Sincerely yours;



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Enclosures

cc: Mr. -Pete Sazama - PSC