



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

(217) 785-2359

June 8, 2011

CERTIFIED MAIL

7009 2820 0001 7486 4859

Brian H. Martin, CHMM
Ameren Services
One Ameren Plaza
1901 Chouteau Avenue, P.O. Box 66149
St. Louis, Missouri 63166-6149

Re: 0190100008--Champaign County
Champaign/IP Town Gas
Site Remediation Program/Technical Reports

Dear Mr. Martin:

The Illinois Environmental Protection Agency ("Illinois EPA") has completed review of the *Remedial Action Plan Addendum* ("Addendum"). The Addendum was received by the Illinois EPA on June 3, 2011 (Log No. 11-47811).

The Illinois EPA approves of the above Addendum with the following comments:

1. The Illinois EPA understands the excavation will encompass a 20 foot wide by three foot deep trench around almost 75% of the site to remove any remaining surface contamination. However, benzene concentrations exceed the construction worker, industrial/commercial, and residential inhalation Tier 1 remediation objectives in a number of samples. To address these exceedances if they still remain after excavation, the Illinois EPA understands Ameren will conduct in-situ treatment to reduce the concentrations below either Tier 1 inhalation remediation objectives or site-specific Tier 2 inhalation remediation objectives.
2. The action levels identified in the Addendum refer to levels identified in the Ambient Air Monitoring Plan dated June 12, 2009. If these action levels are exceeded a spray-on cover material will be used to control the migration of vapors off-site. If the spray-on cover material does not reduce the vapors, the Illinois EPA recommends backfilling the trench with soil to reduce the migration of vapors.

3. The Addendum does not state sidewall confirmation soil samples will be collected from the excavated area. However, after our telephone conversation, confirmation sidewall samples will be collected along the outside edges of the trench. Since in-situ treatment will be used to address contamination deeper than three feet (depth of the excavation), bottom confirmation samples will not be collected.
4. The first phase (Area 1 on Figure 1 of the Addendum) is scheduled for excavation on Thursday June 9, 2011. The Illinois EPA should be notified at least 72 hours prior to any future open air excavations.

All future submittals to the Illinois EPA concerning the Illinois Power Town Gas site in Champaign should include one original and two copies of each document. If you have any questions, please feel free to contact me at above telephone number, address or e-mail me at Greg.Dunn@illinois.gov.

Sincerely,



Gregory W. Dunn, L.P.G., Manager
Voluntary Site Remediation Unit B
Remedial Project Management Section
Division of Remediation Management
Bureau of Land

cc: Bureau of Land File
Stan Black

Pete Sazama, P.G.
PSC Industrial Outsourcing, LP
210 West Sand Bank Road
Columbia, IL 62236-0230