



Environmental Services Group
North Central Region

November 4, 1997
Project 17246

Mr. Brian H. Martin
Illinois Power Company
500 South 27th Street
P.O. Box 511
Decatur, Illinois 62525-1805

Dear Brian:

**Subject: Response to Illinois EPA Comments on
Champaign MGP IRM Work Plan**

We are in receipt of the Illinois Environmental Protection Agency's (IEPA) letter dated October 24, 1997, forwarded by you. The following items are provided in response to the comments of the IEPA's review of the Champaign Interim Remedial Measure Work Plan. We trust that this letter will preclude the need to revise and re-issue the Work Plan.

- Item 1 - The revised Figure 1 is enclosed. The purpose of the test trench 80 feet east of GH-1 is to investigate an area where historical documents show structures or foundations. It is unknown whether these features were above or below-ground or whether they could be source areas.
- Item 2 - Former site structures that are pertinent to the present interim remedial measures are included in Figure 1. Because a figure showing former site structures, including the above-ground gas holders, is provided in both the remedial investigation and supplemental site investigation reports, we did not include them on Figure 1, or repeat the figure in the work plan. At your request, a site plan showing former site structures, including GH-2 and GH-3 is enclosed.
- Item 3 - The specific blending approach cannot be identified because the content of the tar wells is unknown. As explained in Section 5.3, page 13, the tar handling structures will be excavated, stockpiled and tested. If the tar well material is lightly impacted, it may be possible to utilize it as a partial substitute for other blending materials in the GH-1 blend. Blending ratios for highly impacted material will be devised based on the benzene content and type of material found.



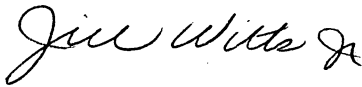
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Blending materials will consist of soil, coal and quicklime; however, the ratios cannot be specified until the material is analyzed.

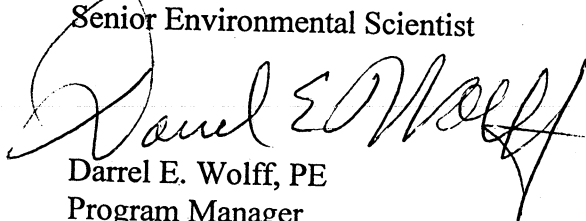
- Item 4 - Wastewater will be processed through the on-site treatment system as soon as the permit is approved by the IEPA. Additional Baker tanks will be brought on site as necessary to store all wastewater until permission to discharge is obtained. The volume estimate of 134,000 gallons may be considered a maximum.

If you have any questions, please contact me at 618/281-7173.

Sincerely yours,
PHILIP SERVICES CORPORATION



Jill A. Witts
Senior Environmental Scientist



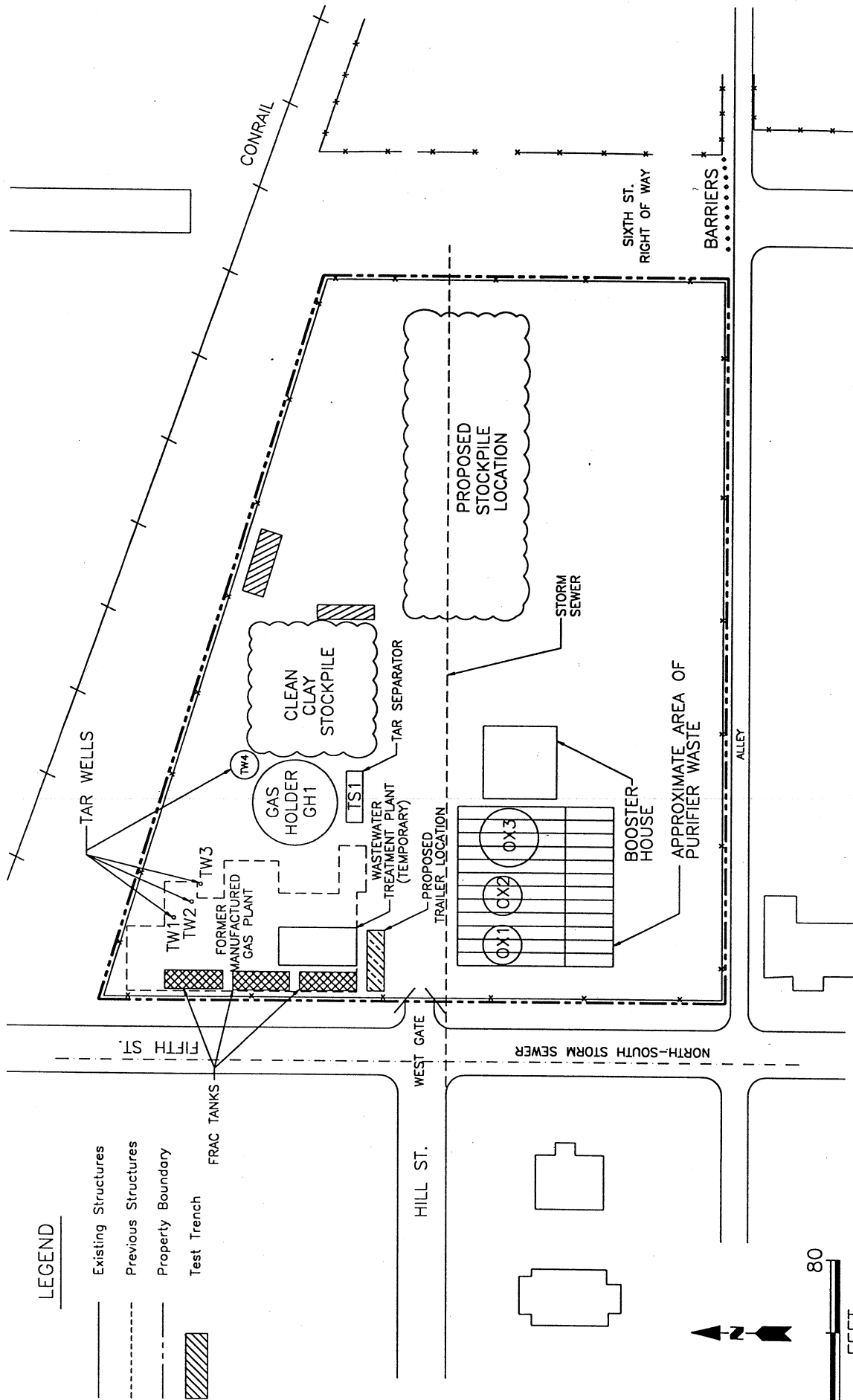
Darrel E. Wolff, PE
Program Manager

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Enclosure: Figure 1 - Revised
Site Plan Showing Former Gas Plant Features

LEGEND

- Existing Structures
- Previous Structures
- Property Boundary
- Test Trench



PROJECT NO.: 17246	
MGP SOURCE REMOVAL CHAMPAIGN, ILLINOIS	

DWN: MRC	DES.: SJC
CHKD:	APPD:
DATE: 11/3/97	REV: A

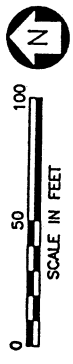
TITLE: **SITE PLAN
INTERIM REMEDIAL MEASURES
SOURCE REMOVAL**

PHILIP ENVIRONMENTAL

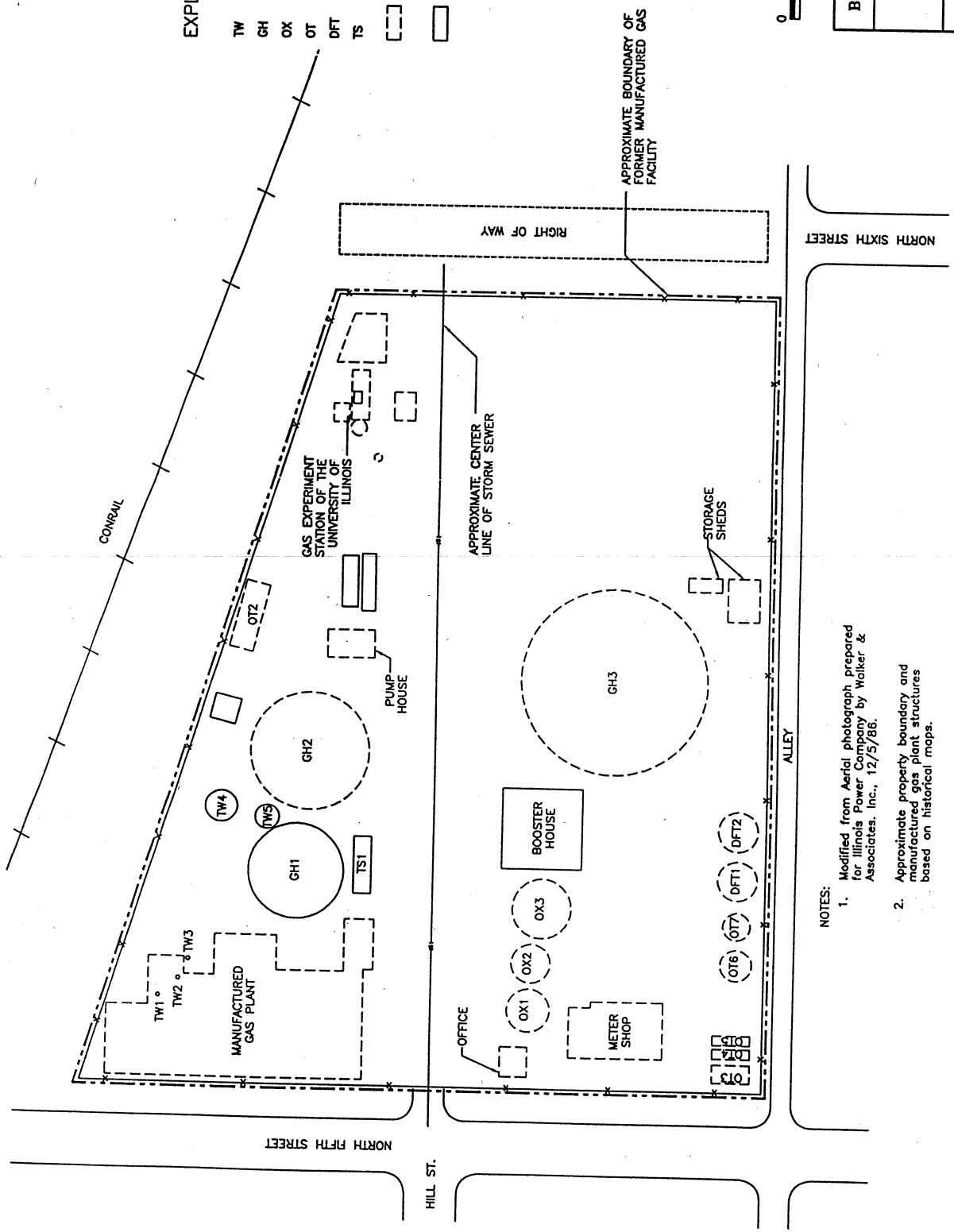
FIGURE 1

EXPLANATION

- TW TAR WELL
- GH GAS HOLDER
- OX OXIDE PURIFIER PAD
- OT OIL TANK
- DFT DIESEL FUEL TANK
- TS TAR SEPARATOR
- FORMER ABOVEGROUND STRUCTURES, TANKS AND GAS HOLDERS
- EXISTING, BELOW-GROUND TAR WELL, GAS HOLDER, OXIDE PURIFIER AND EXISTING BUILDING (BOOSTER HOUSE)



Burlington Environmental Inc.	
FORMER FACILITY SITE PLAN	
IP, CHAMPAIGN CHAMPAIGN, ILLINOIS 123439	FIGURE 1-2



- NOTES:**
1. Modified from Aerial photograph prepared for Illinois Power Company by Walker & Associates, Inc., 12/5/86.
 2. Approximate property boundary and manufactured gas plant structures based on historical maps.