



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217-524-3285

January 13, 2021

Ronald Mentzer
City of Warrenville
3S258 Manning Avenue
Warrenville, IL 60555

Re: LPC# 0430835012 – DuPage County
Warrenville/Phillips 66 Company
Site Remediation/Technical Reports

Dear Mr. Mentzer:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the *Comprehensive Site Investigation Report/Remediation Objectives Report/Remedial Action Plan* received September 29, 2020 (Illinois EPA Log No. 20-71989) and prepared by Terracon Consultants, Inc. for the Site Remediation Project located at 28W244 Warrenville Road, Warrenville, Illinois. The document referenced above has been conditionally approved with the following comments.

1. Future plans for the site include redevelopment into a public park that may also include private mixed-use (commercial/office/residential) redevelopment. Any existing or future buildings constructed on the site must contain a full concrete slab-on-grade floor or full concrete basement floor and walls with no sumps. Please provide a description of the future building(s).
2. The report states IEMA incident 972502 will be closed concurrently through the LUST program. Please provide appropriate documentation of field work and operations, photographs, confirmation sampling results, discussion, etc. It must be demonstrated that the confirmation sampling results comply with the remediation objectives approved for the site. In addition, please provide the applicable indicator contaminants for IEMA incident 972502.
3. According to Section 1.1.3 *Recognized Environmental Conditions*, there are four out of service underground storage tanks (USTs) on site including two 20,000-gallon gasoline USTs, one 12,000-gallon diesel fuel UST, and one 8,000-gallon gasoline UST. The four USTs should be properly closed in accordance with Illinois EPA and Office of the

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1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000
595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

State Fire Marshall regulations.

4. If Tier 2 groundwater remediation objectives are being proposed in accordance with 35 IAC 742.805(a) through (e), it must be demonstrated using Equation R26 that the concentration of any contaminant of concern in groundwater will meet Class I standards at the point of human exposure (currently the property boundary with an on-site groundwater use restriction). The point of human exposure should be clearly defined including “x” distances from contaminant plumes to the property boundary (or to the property boundary(s) of adjacent properties if ELUCs on adjacent properties are being proposed).
5. If an Environmental Land Use Control (ELUC) is proposed as an institutional control to address off-site impacts, all of the requirements of 35 IAC 742.1010 must be met.
6. If a groundwater ordinance is proposed to use as an institutional control to address off-site impacts (measured or modeled), then an original certified copy of the groundwater ordinance must be submitted for review and approval by the Illinois EPA Division of Legal Counsel and all of the requirements of 35 IAC 742.1015 must be met.
7. Section 3.1.1 in the *Remedial Action Plan* proposes use of an alternative engineered barrier in portions of the site to exclude the residential ingestion exposure route. Specifically, use of eighteen (18) inches of clean soil/fill in combination with a geotextile. Please provide the geotextile specification sheet and a sample of the material.
8. According to *Section 3.1.1 Major Components*, a determination of area background concentration for iron in groundwater is being considered to determine if detected iron concentrations are typical of naturally occurring iron concentrations for the area of the remediation site. If an attempt is made to determine an area background concentration for iron, the determination must meet the requirements of 35 IAC 742.410. If this determination does not result in a favorable outcome, iron cannot be included as part of a future NFR letter without some type of active remediation or an alternative Tier 3 approach.
9. The Illinois EPA anticipates receipt of a *Remedial Action Completion Report (RACR)* and associated confirmation sampling results. The RACR must address the applicable requirements of 35 IAC 740.455, 35 IAC 742, and the comments outlined herein. Appropriate certification (documentation of field work and operations, photographs, confirmation sampling results, discussion, etc.) must be provided in the RACR. It must be demonstrated that confirmation sampling results comply with the remediation objectives approved for the site.

Please submit two (2) copies of all future reports or correspondence to the Illinois EPA regarding this site. Also, the Illinois EPA requests not less than fourteen (14) calendar days notification of all future site investigation and remedial activities in order to coordinate Illinois EPA oversight. This notification is particularly important when groundwater or soil samples are being collected. Failure to notify the Illinois EPA may invalidate sample analysis results and/or other site

activities. If you have any questions I may be contacted at the address or telephone number listed above.

Sincerely,

A handwritten signature in cursive script that reads "Patricia Silva" followed by "by NSU" in a smaller, less cursive font.

Patricia Silva
Project Manager
Voluntary Site Remediation Unit
Remedial Project Management Section
Division of Remediation Management
Bureau of Land

cc: Linda Yang
Terracon Consultants, Inc.
Linda.Yang@terracon.com

Bureau of Land File