ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 – (217) 782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 – (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

217/524-3300

August 30, 2007

Certified Mail
7004 2510 0001 8617 3742

Vision Properties Blue Island, LLC
Attn: Mr. Benjamin L. Kadish, Managing Member
333 West Wacker Drive, Suite 1020
Chicago, Illinois 60606

RECEIVED
SEP 26 2007
DIVISION FRONT OFFICE
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Re: 0310240004 -- Cook County
Vision Properties Blue Island
ILD005109525
Log No. B-149-CA-25
Received: April 5, 2007
RCRA Permit

US EPA RECORDS CENTER REGION 5
1010222

Dear Mr. Kadish:

This is in response to a letter dated April 5, 2007 and received by the Illinois EPA on April 5, 2007. It was submitted on your behalf by Mahlon T. Hewitt, III, PG, of Andrews Environmental Engineering regarding RCRA corrective action efforts at the above-referenced facility being carried out in accordance with its RCRA permit. Vision Properties has completed a substantial amount of investigation of the solid waste management units (SWMUs) of concern at this facility. The subject submittal contained certain information regarding these investigation efforts.

The subject submittal consists of the facility's responses to Condition Nos. 4, 6, 7 and 8 of the February 8, 2007 Illinois EPA letter (Log No. B-149-CA-24). It was reviewed as a request to modify the approved corrective action program for the Vision Properties facility and is hereby approved subject to the following conditions and modifications:

1. Regarding the facility's response to Condition 4 of the February 8, 2007 Illinois EPA letter:

   a. The Illinois EPA has determined that it can approve the facility's request for closure of groundwater associated with SWMU 12 with the following conditions and modifications:

      i. The facility must meet the requirements for closure of soils at SWMU 12 pursuant to Condition Nos. 3, 9, 10, and 11 of the attachment entitled, "Conditions/Modifications for the RFI Phase I Report, Gilbert & Bennett,

Log No. B-149-CA-3", of the January 29, 1999 Illinois EPA letter (Log No. B-149-CA-3).

ii. Within 60 days of the date of this Illinois EPA response, the facility must submit, pursuant to 35 Ill. Adm. Code 703.281, a Class 1* Permit Modification Request to include monitoring wells G106, G107, and G108 in the monitoring program for SWMU 1, and the regulated unit outlined in Section II of the Permit.

iii. The facility must address detected releases of contaminants to the uppermost aquifer as required by Condition II.F of the Permit.

iv. The Illinois EPA reserves the right to require the installation of additional monitoring wells as determined necessary by groundwater corrective action activities required by Condition II.F of the Permit.

2. Regarding the facility's response to Condition 6 of the February 8, 2007 Illinois EPA letter:

a. The Illinois EPA has determined that it can approve the proposal to investigate groundwater contamination at AOC-2 by conducting groundwater sampling and analysis for 35 Ill. Adm. Code 724, Appendix I VOCs and SVOCs at monitoring wells R109, R110 and R112.

b. Within 60 days of the date of this Illinois EPA response, the facility must submit a report in the form of a request to modify corrective action activities for groundwater at AOC-2. The report must include, but not be limited to the following:

i. Tabulated analytical results for the groundwater monitoring activities approved in Condition 2.a above. The tables must highlight detected exceedences of appropriate 35 Ill. Adm. Code 742, Tier 1 Class I Groundwater Remediation Objectives (GROs) or 35 Ill. Adm. Code 620 Class I Groundwater Quality Standards (GQSs) as appropriate;

ii. Copies of the final laboratory sheets which report the results of the analyses, including final sheets reporting QA/QC data;

iii. An evaluation of the groundwater data including:

A. Identification of any constituent previously undetected in wells R109, R110, and R112;

B. Identification of any constituents exceeding appropriate GROs or GQSs;

C. Depictions of the extent of contamination for each constituent exceeding appropriate GROs or GQSs;

D. Groundwater elevation maps;

E. Discussion of any previously collected data used as supplemental information in this evaluation;

F. Discussion regarding the nature and source of the contamination;

iv. A course of action for groundwater at AOC-2 based on the information discussed above.

3. Regarding the facility's response to Condition 7 of the February 8, 2007 Illinois EPA letter:

a. Monitoring for calcium, magnesium, and sodium at wells G106, G107 and G108 is addressed by Condition 1.d.ii above;

b. The Illinois EPA has determined that it can approve the facility's request to further investigate the nature and extent of calcium, magnesium and sodium at wells R109, R110 and R112 in the event that TDS concentrations exceed the Class I GQS of 1,500 mg/L during groundwater investigation activities at AOC-2.

4. Regarding the facility's response to Condition 8 of the February 8, 2007 Illinois EPA letter:

a. The proposal to discontinue monitoring of TOC and TOX at well G106, G107 and G108 cannot be approved at this time. Monitoring TOC and TOX at wells G106, G107, and G108 is addressed by Condition 1.d.ii above;

b. The Illinois EPA has determined that it can approve the facility's request to continue monitoring TOC and TOX at well R109, R110 and R112 until such time that the list of COCs is determined for AOC-2.

5. The facility must continue semi-annual monitoring of groundwater in accordance with the requirements of the February 8, 2007 Illinois EPA letter.

6. A summary of groundwater activities is provided in Attachment A to this Illinois EPA response.

7. The Illinois EPA has received the proposed draft ELUC. It is currently under review and will be addressed in a forthcoming Illinois EPA response.

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

Work required by this letter, your submittals 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 groundwater issues associated with this project, please contact Scott Kaufman at 217/785-6869. Questions regarding other aspects of corrective action should be directed to William T. Sinnott, II at 217/524-3310.

Sincerely,

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

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DSK BM JKM

Attachment A: Groundwater Activity Summary, June 2007

cc: Dale Meyer - USEPA Region V
Mahlon T. Hewitt, III, Andrews Environmental Engineering, Inc.

ATTACHMENT A

Vision Properties - Groundwater Activity Summary, August 2007

Waste Management Unit	Monitoring Wells	Groundwater Actions Required	Status of Groundwater Quality Parameters				
			Deleted Groundwater Parameters	Basis for Deleted Parameter	Date of Illinois EPA Approval	Illinois EPA Approval Letter Log No.	Parameters for Which IC Must be Established
SWMUs 5, 10 and 19	R109 R110 G111 R112 G113 G114	Establish institutional control via TACO Subpart J to achieve closure of GW with restrictions at SWMUs 5, 10 and 19. Discontinue groundwater quality monitoring at wells G111, G113 and G114. Conduct only groundwater elevation measurements at G113.	Cis-1,2-DCE	TACO, Tier 2	11/13/2003	B-149-CA-15, 16 and 18	x
			TCE	TACO, Tier 2	11/13/2003	B-149-CA-15, 16 and 18	x
			Vinyl chloride	TACO, Tier 2	11/13/2003	B-149-CA-15, 16 and 18	x
			Copper	TACO, Tier 2	11/13/2003	B-149-CA-15, 16 and 18	x
			sulfate	TACO, Tier 2	11/13/2003	B-149-CA-15, 16 and 18	x
			Ra-226	<GQS	6/20/2006	B-149-CA-21 and 22	
			Ra-228	<GQS	6/20/2006	B-149-CA-21 and 22	
			chromium	BG	6/20/2006	B-149-CA-21 and 22	
SWMUs 1, 12 and 13	G106 G107 G108	Establish institutional control for zinc modeled from well G101 (Zinc TACO evaluation must be tied to SWMUs 12 or 13. TACO cannot be applied to, and an NFA cannot be granted for, GW at SWMU No. 1 because the unit was closed as a landfill). Closure of GW with restriction approved for SWMU 12 contingent on establishing institutional control. Continued assessment of GW exceedences for iron, sulfate, and chloride via groundwater monitoring at the regulated unit and SWMU 1 (See Condition 1 of current IEPA response). Groundwater action for SWMU 13 contingent on results of soils investigation. Continued semi-annual monitoring.	Zinc (modeled from G101)	TACO, Tier 2	11/13/2003	B-149-CA-15, 16 and 18	x
			chromium	BG	6/20/2006	B-149-CA-21 and 22	
			lead	BG	6/20/2006	B-149-CA-21 and 22	
			manganese	BG	6/20/2006	B-149-CA-21 and 22	
			nickel	BG	6/20/2006	B-149-CA-21 and 22	
			copper	<GQS	6/20/2006	B-149-CA-21 and 22	
			phenolics	<GQS	2/8/2007	B-149-CA-24	
AOC-2	R109 R110 R112	Submit investigaton report for AOC-2 (see Condition 2 of current IEPA response). Continued semi-annual monitoring.	phenolics	<GQS	2/8/2007	B-149-CA-24	
			fluoride	<GQS	2/8/2007	B-149-CA-24	
Capped Hazardous Waste Area (Regulated Unit)	R101 G102 R103 G105 R105	Assess groundwater quality exceedences to meet the requirements of Condition II.F of the Permit. Continue groundwater monitoring in accordance with Section II of the Permit.	N/A	N/A	N/A	N/A	

N/A - Currently Not Applicable
BG - Background evaluation pursuant to 35 Ill. Adm. Code 742.410 and .415
GQS - 35 Ill. Adm. Code 620, Class I Groundwater Quality Standard
IC - Institutional Control

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USEPA

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 – (217) 782-3397
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ROD R. BLAGOJEVICH, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

217/524-3300

June 14, 2006

CERTIFIED MAIL
7004 2510 0001 8593 2876

Vision Properties Blue Island, LLC
Attn: Mr. Benjamin L. Kadish, Managing Member
333 West Wacker Drive, Suite 1020
Chicago, Illinois 60606

Re: 0310240004 -- Cook County
Vision Properties Blue Island, LLC (Vision Properties)
(Formerly Gilbert & Bennett Mfg. Co.)
ILD005109525
Log No. B-149-CA-24
Received: June 1, 2005, October 31, 2005, and May 5, 2006
RCRA Permit

Dear Mr. Kadish:

This is in response to the May 2005, October 28, 2005 and May 4, 2006 submittals made on your behalf by Sean C. Chisek, P.E. of Andrews Environmental Engineering, Inc. regarding RCRA corrective action activities at the above-referenced facility being carried out in accordance with its RCRA permit. These submittals contained proposed engineered barriers for several solid waste management units SWMUs at the facility; they also presented a temporary authorization request to modify the final cover for the former hazardous waste surface impoundment closed as a landfill at the facility.

These submittals were handled as a request to modify the corrective action currently being conducted and is hereby approved subject to the following conditions and modifications:

1. This letter only addresses the engineered barriers proposed for corrective action activities, it does not address the temporary authorization request for modifying the final cover over the former hazardous waste surface impoundment closed as a landfill.

2. One of the SWMUs at this facility is Mosquito Creek. A report documenting the results of an investigation conducted at this unit has been submitted to Illinois EPA and is currently under review.

3. The following is a list of Solid Waste Management Units which will have engineered barriers or final covers modified by this approval letter affected by the modification:

SWMU No.	SWMU Name
1	Pre RCRA Impoundment
7	Scrap Steel Storage Area
14	Suspected Disposal Area
15	Landfarm No. 1
16	Landfarm No. 2

These 6 solid waste management units are already covered with concrete or are proposed to be covered with concrete. SWMUs 7 and 12 are already covered with concrete. SWMUs 14, 15 and 16 are proposed to be covered with concrete. SWMU 1 is partially covered with concrete and it is proposed for the remaining area to be covered with concrete.

4. SWMUs 5, 10, 12, and 19 present at the facility require: (1) an institutional control is established to restrict future use of the facility to commercial/industrial activities; and (2) a groundwater investigation carried out in accordance with plans approved by Illinois EPA and, as necessary, a groundwater remediation program.

5 Remediation objectives for this project have been based on one of the following: (1) industrial/commercial property use; (2) engineered barriers; (3) point of human exposure at a location other than the source; and/or (4) exclusion of exposure routes. In accordance with 35 Ill. Adm. Code 742.1000, an institutional control meeting the requirements of 35 Ill. Adm. Code 742, Subpart J must be established to ensure that these facts do not change in the future, as they were fundamental to the establishment of the approved remediation objectives.

A proposed institutional control meeting the requirements of 35 Ill. Adm. Code 742, Subpart J must eventually be submitted to Illinois EPA for review and approval after all corrective action efforts have been completed at this facility. It must be noted that Illinois EPA's internet site (www.epa.state.il.us) contains guidance regarding proposed institutional controls, including a model environmental land use control.

6 The institutional control for an engineered barrier must be developed in accordance with 35 Ill. Adm. Code 742, Subpart J and must also clearly include the following information and restrictions:

a. A statement that contaminated soil is present at the site, but does not pose a threat to human health or the environment, provided an engineered barrier returns over it and the restrictions set forth in the institutional control are met;

b. A scaled drawing showing the boundaries of the required engineered barrier placed over the contaminated soil, relative to the property boundaries at the site;

c. A description of the construction details of the required engineered barrier based over the contaminated soil;

d. A requirement that the engineered barrier in place over the contaminated soil of concern properly maintained in a future;

e. A requirement that a site safety plan meeting the requirements of 29 CFR be developed and implemented any time construction/excavation work takes place in the contaminated soil present beneath the engineered barrier. Among other things, this plan must properly restrict worker exposure and any other person's exposure to the contaminated soil;

f. A requirement that any soil removed from beneath the engineered barrier be managed in accordance with 35 Ill. Adm. Code, Subtitle G: Waste Disposal.

7. For SWMU #1 (the Closed (pre-RCRA) Surface Impoundment), a determination has been made that: (1) the final cover over this disposal unit is adequate; (2) an institutional control restricting future activities at this unit must be established; and (3) long term post-closure care of this unit must be provided (mainly maintenance of the final cover and groundwater monitoring).

a. The institutional control for this unit must be developed in accordance with 35 Ill. Adm. Code 742 and also include the following:

(1) A survey plat which shows the locations and dimensions of the nit relative to the legal boundaries of the site. This plat must be developed by a licensed professional surveyor and utilize permanently surveyed benchmarks.

(2) A notation that the unit has been used for the disposal of waste and closed to the satisfaction of Illinois EPA by the placement of a final cover system consisting of compacted soil and a vegetative layer;

(3) A notation that the post-closure use of the unit must never be allowed to disturb the integrity of the unit's final cover and monitoring system, unless the Illinois EPA determines in writing that the disturbance: (a) is necessary for the proposed use of the property, and will not increase the potential hazard to human health or the environment; or (b) is necessary to reduce the threat to human health or the environment.

b. The final cover over the unit must be inspected on a quarterly basis during the term of the facility's RCRA permi. During this period, corrective action must be taken if problem are observed during the required inspections, including but not limited to the following:

ponding
cracks in the final cover greater than 1" wide
gas problems
odor problems
dead or stressed vegetation
vegetation with taproots growing in areas not designed to do so
vector problems
leachate popouts or seeps

In addition, the final cover must be inspected after each precipitation event greater than 1" over a 24-hour period. All observations during the inspections and corrective action taken must be recorded in a log book. This log book shall be available for Illinois EPA review. In addition, all corrective actions taken shall be closed monitored during subsequent inspections.

c. Groundwater monitoring shall continue to be carried out in accordance with Section II of the facility's RCRA permit and any other requirements associated with the corrective action program required by the RCRA permit.

8. 35 Ill. Adm. Code 742.1010(d)(8) requires that an ELUC contain scaled maps which show information about the facility, any remaining contamination at the facility and any physical features at the facility to which the ELUC applies.

a. The required scaled site maps must specifically show:

(1) the legal boundary of the property to which the ELUC applies;

(2) the horizontal and vertical extent of contaminants of concern above applicable remediation objectives for soil to which the ELUC applies;

(3) Any physical features to which an ELUC applies (e.g., engineered barriers, monitoring wells, caps); and

(4) The nature, location of the source, and the direction of movement of the contaminants of concern.

b. Exhibit B of the model ELUC developed by Illinois EPA is comprised of the maps necessary to meet the requirements of 35 Ill. Adm. Code 742.1010(d)(8). In developing such an exhibit for an ELUC associated with an engineered barrier or industrial/commercial land use restrictions:

(1) If only one drawing is used to present all the required information, then it must be clearly labeled as Exhibit B to the ELUC in question. Many times however, it will be necessary to include more than one drawing in Exhibit B to meet the requirements of 35 Ill. Adm. Code 742.1010(d). In such cases, each map shall be given a unique Exhibit number (i.e. Exhibit B-1, B-2, B-3, etc.) and labeled as such.

(2) A cover sheet must be provided for the exhibit which: (a)lists the types of scaled maps that must be provided in the ELUC as required in 35 Ill. Adm. Code 742.1010(d)(8); (b) identifies the map within the exhibit which addresses the individual requirements of 35 Ill. Adm. Code 742.1010(d)(8)(A), (B), (C) and (D); and (c) lists the maps which comprise the exhibit by name and number.

(3) The Real Estate Tax Index/Parcel Index Number (PIN) of the Property in question must be contained on each map in Exhibit B.

9. Once an ELUC is approved for use as an institutional control in accordance with 35 Ill. Adm. Code 742.1010, it will be necessary for the facility to complete the no further action recording requirements of 35 Ill. Adm. Code 742 Subpart J for Solid Waste Management Units. These remediation recording requirements have been outlined below to further explain the activities that must be completed:

a. Pursuant to 35 Ill. Adm. Code 742.1010(b)(1), an ELUC used as an institutional control shall be recorded in the Office of the Recorder or Register of Titles for the county in which the property that is the subject of the ELUC is located together with the instrument memorializing the Illinois EPA's no further action

determination pursuant to the specific program within 45 days of the receipt of the Illinois EPA's no further action letter.

b. The institutional control implemented under 35 Ill. Adm. Code 742.1010 shall not become effective until officially recorded in accordance with Condition 9.a above. The person receiving the approval shall obtain and submit to the Illinois EPA, at the address below within 30 days after recording a copy of the institutional control, a certified true copy of the institutional control demonstrating that it has been recorded.

10. The Illinois EPA has determined that it can approve the groundwater portions of the subject submittal with the following conditions and modifications:

a. All monitoring wells that fall within the area of the parking lot must have surface completions that meet the requirements of Condition II.C.2 of the Permit.

b. The facility must submit revised well completion reports for all monitoring wells with surface completions that are modified as a result of the parking lot installation. This information must submitted to the address below within 30 days of the date that the well is modified.

Illinois Environmental Protection Agency
Permit Section
Bureau of Land - #33
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

c. The information required by Condition 10.b above must be submitted as revisions to Section E of the facility's Permit Renewal Application.

d. The facility must continue groundwater monitoring and corrective action at the regulated unit and SWMU No. 1 in accordance with Section II of the Permit.

e. The facility must continue groundwater monitoring and corrective action activities in accordance with Section IV of the Permit.

f. The installation of the parking lot does not preclude or relieve the facility of the responsibility to conduct groundwater corrective action activities necessary to meet the requirements of Condition II.F of the Permit.

Illinois Environmental Protection Agency
Bureau of Land/Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

11. Until such time as an acceptable institutional control is in place to restrict certain activities at this facility, Vision Properties must take the appropriate steps to ensure the restrictions set forth in Conditions 4, 6 and 7 above.

12. Corrective action efforts at this facility must be carried out in accordance with: (1) 35 Ill. Adm. Code 620, 724 and 742; (2) the subject facility's RCRA permit; and (3) Illinois EPA letters regarding such activities.

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

Work required by this letter, your submittals 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 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 corrective action at the facility please contact William T. Sinnott, II at 217/524-3310. If you have any questions regarding groundwater issues please contact Scott Kaufman at 217/785-6869. Any remaining questions regarding permit related issues should be directed to John Riekstins at 217/524-3309.

Sincerely,

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

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SKM OSK JBR

cc: Harriet Croke—USEPA Region V
Sean C. Chisek, P.E., Andrews Environmental Engineering, Inc.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR RENEE CIPRIANO, DIRECTOR

217/524-3300

Certified Mail
7002 3150 0000 1106 3249

January 26, 2005

Vision Properties Blue Island, LLC
Attn: Mr. Benjamin L. Kadish, Managing Member
333 West Wacker Drive, Suite 1020
Chicago, Illinois 60606

Re: 0310240004 -- Cook County
Vision Properties Blue Island, LLC (Vision Properties)
(Formerly Gilbert & Bennett Mfg. Co.)
ILD005109525
Log No. B-149-CA-20 (revised)
Received: August 6, 2004; January 7, 2005
RCRA Permit

Dear Mr. Kadish:

This is in response to your January 7, 2005 submittal indicating that Page 8 was missing from Illinois EPA's December 28, 2004 letter approving the "RCRA Phase II Supplemental Investigation" submitted August 5, 2004 on your behalf by Mahlon T. Hewitt III LPG, Andrews Environmental Engineering, Inc. Mr. Hewitt's submittal addressed corrective action at several solid waste management units (SWMUs) undergoing corrective action in accordance with Section IV of the above-referenced facility's RCRA permit.

To ensure that Vision Properties has adequate time to respond to the requirements in the December 28, 2004 letter, Illinois EPA is taking formal action on your submittal. Specifically, Illinois EPA hereby approves your January 7, 2005 submittal and the RCRA Phase II Supplemental Investigation submitted by Mr. Hewitt as modifications to the approved corrective action program for the above-referenced facility, subject to the following conditions and modifications (please note that Conditions 2 through 20 below are the same as Conditions 1 through 19 of the December 28, 2004 letter):

1. This letter shall supersede Illinois EPA's December 28, 2004 letter. The appeal rights cited at the end of this letter begin with the revised date of this second letter. Any other specific conditions with time requirements associated with them shall also begin with the date of this letter.

2. The SWMUs of concern at this facility are as follows:

a. SWMU 1—Closed (pre-RCRA) Surface Impoundment

b. SWMU 2—Water Soluble Waste Oil Drum Storage Area

c. SWMU 7—Scrap Steel Storage Area

d. SWMU 10—Trichloroethylene Hazardous Waste Storage Area in Production Area

e. SWMU 12—Wastewater Treatment System

f. SWMU 13—Mosquito Creek

g. SWMU 14—Suspected Disposal Area

h. SWMU 15—Landfarm No. 1

i. SWMU 16—Landfarm No. 2;

j. SWMU 17—Sulfuric Acid Cleaning House

k. SWMU 19—Trichloroethylene Hazardous Waste Storage Area Northeast of Production Area

A drawing showing the location of each of these units within the facility is attached. In addition, a table summarizing the current status of corrective action efforts at each of these SWMUs is also attached.

3. The Solid Waste Management Unit referred to as Mosquito Creek cannot be considered clean closed at this time. Lead contamination above Tier 1 levels set forth in 35 Ill. Adm. Code 742 has been found at this unit. A plan to conduct further investigation at this unit was approved by Illinois EPA on September 8, 2004. Once the contamination at this unit has been adequately characterized, it will be necessary for Vision Properties to take appropriate action to ensure the contaminant levels remaining at this unit meet the requirements of 35 Ill. Adm. Code 742.

4. The SPLP results for soil samples collected and analyzed for metals which are presented in Table 3 indicate that the detection limit is higher than the remediation objectives found in 35 Ill. Adm. Code 742. As such, it appears as though the soil samples must be collected and analyzed again.

5. Based on boring logs and geologic cross-sections provided in the subject submittal, the Illinois EPA concurs with the facility's conclusion that the site was constructed on top of historical fill material, and that the fill material is laterally extensive across the site.

6. The Illinois EPA does not consider SPLP results to be directly comparable to 35 Ill. Adm. Code 742 Tier 1 GROs and thus does not concur with the discussion of those comparisons in Section 3.2 of the subject submittal or the analytical result comparisons as presented in Table 5 of the subject submittal.

7. The Illinois EPA has determined that, at this time, it cannot approve the facility's request to delete chloride, sulfate, iron, manganese, nickel and zinc from groundwater monitoring at SWMUs 1, 5, 10, 12, 13 and 19 or the capped hazardous waste area (regulated unit) based on 35 Ill. Adm. Code 620.420(a)(3). This is due to the following:

   a. The boring logs and geologic cross-sections provided in the subject submittal indicate that the uppermost aquifer at the facility extends to greater than 10 ft below the original land surface and possesses additional criteria specified in 35 Ill. Adm. Code 620.210. This information indicates that groundwater at the facility is appropriately classified as Class I Groundwater in accordance with 35 Ill. Adm. Code Part 620. The groundwater parameter monitoring exemption discussed in 35 Ill. Adm. Code 620.420(a)(3) applies to Class II Groundwater only.

   b. The facility has not adequately demonstrated that these groundwater contaminants are not the result of releases from sources other than the SWMUs or the regulated unit. The Illinois EPA acknowledges that the facility has been working to complete a background evaluation pursuant to 35 Ill. Adm. Code 742.410 as required by Condition 4 of the November 13, 2003 Illinois EPA letter (Log No. B-149-CA-15, 16 and 18). The statistical demonstration discussed in Section 3.4 of the subject submittal is not appropriate to meet the requirements of 35 Ill. Adm. Code 742.410. Therefore, that evaluation has yet to be completed, and as a result, not enough information is available to make that determination.

   c. Requests to remove parameters from the groundwater monitoring requirements for the regulated unit must be in the form of requests to modify Section II of the Permit through a permit modification request.

8. The Illinois EPA has determined that, at this time, it cannot approve the facility's request to delete cadmium, chromium and lead from groundwater monitoring at SWMUs 1, 5, 10, 12, 13 and 19 or the capped hazardous waste area based on currently observed background concentrations. This is due to the following:

a. The Illinois EPA does not concur with the following statement on Page 13 of the subject submittal:

> "... a comparison of the parameters cadmium, chromium and lead to that found in the background or upgradient well G115 reveals that the background concentration of these parameters appear to be greater than that found on-site."

This statement is not totally accurate. While it appears true for chromium and lead based on First and Second Quarter 2004 groundwater results, historically their concentrations tend to be about an order of magnitude higher at well G-110 than concentrations detected so far at well G-115. As discussed in Condition 8.c below, an appropriate background evaluation for these parameters has yet to be completed by the facility. Additionally, the statement quoted above has been true for cadmium in eastern portions of the facility, but not the vicinity of well R-110. At that well, cadmium has consistently been detected at concentrations several orders of magnitude higher than observed so far at well G-115.

b. The Illinois EPA does not concur with the following statement from Page 13, paragraph 3 of the subject submittal:

> "... it is Andrews Engineering opinion that the ubiquitous nature of the parameters of concern provide sufficient evidence to document that the groundwater impacts are not from the remaining SWMUs."

The Illinois EPA acknowledges that information provided in the subject submittal indicates that many of these contaminants are relatively widespread across the facility. However, widespread distribution is not in and of itself sufficient evidence to demonstrate that groundwater impacts are not from any of the SWMUs. The facility must adequately demonstrate that concentrations of contaminants in downgradient wells are not the result of releases from the SWMUs or the regulated unit. This has yet to be accomplished for the units in question.

c. As discussed in Comment 8.b above, the Illinois EPA acknowledges that the facility has been working to complete a background evaluation pursuant to 35 Ill. Adm. Code 742.410 as required by Condition 4 of the November 13, 2003 Illinois EPA letter (Log No. B-149-CA-15, 16 and 18). The statistical demonstration discussed in Section 3.4 of the subject submittal is not appropriate to meet the requirements of 35 Ill. Adm. Code 742.410. Therefore, that

evaluation has yet to be completed, and as a result, not enough information is available to make that determination.

d. Requests to remove parameters from the groundwater monitoring requirements for the regulated unit must be in the form of requests to modify Section II of the Permit through a permit modification request.

9. Based on Conditions 7 and 8 above, the Illinois EPA has determined that, at this time, it cannot approve the facility's request for a No Further Action (NFA) determination for groundwater at SWMUs 1, 5, 10, 12, 13, and 19.

10. The facility must continue the background evaluation for cadmium, chromium, iron, lead, manganese, nickel, zinc, chloride and sulfate in accordance with Condition 4 of the November 13, 2003 Illinois EPA letter.

11. By February 15, 2005, the facility must submit a report of the results of the background evaluation discussed in Condition 10 above. The report must be submitted as a request to modify corrective action activities at the facility. It must include, but not be restricted to the following information:

a. Identification of the reason for the subject submittal;

b. A discussion of the statistical method employed in the background analysis;

c. Derived background values for the COCs in question and calculations used to determine those values;

d. A summary in tabular form of analytical data used in the evaluation, including the appropriate Tier 1, Class I GRO and the derived background value for each COC;

e. Isoconcentration maps for each COC depicting the extent of contamination exceeding appropriately derived background concentrations; and

f. A course of action based on the evaluation results.

12. The facility must continue semi-annual groundwater monitoring at SWMUs 1, 5, 10, 12, 13 and 19 in accordance with Conditions 2.a through 2.g of the November 13, 2003 Illinois EPA letter.

13. The November 13, 2003 Illinois EPA letter (Log No. B-149-CA-15, 16 and 18) conditionally approved a Tier 2 evaluation for cis-1,2-DCE, TCE, vinyl chloride, copper, sulfate at SWMUs 5, 10, and 19, as well as zinc at SWMUs 1, 12 and 13. The Illinois EPA thus approves the facility's request to discontinue monitoring for those parameters at the respective SWMUs. Condition 6 of the November 13, 2003 letter, which outlines the steps necessary to eliminate the groundwater ingestion exposure pathway for those COCs, remains outstanding.

14. Considering that historic fill material has been identified to be laterally extensive at the facility, and that 35 Ill. Adm. Code 620.420(a)(3) cannot be applied to groundwater COCs at the facility because of the appropriate groundwater classification, the Illinois EPA wishes to provide the following guidance regarding groundwater:

    a. The facility may be able to request excluding some of the remaining groundwater constituents as COCs pursuant to 35 Ill. Adm. Code 742.415(b)(1) by way of the background evaluation required in Conditions 10 and 11 above.

    b. The facility may request to utilize the derived background values as GROs in accordance with 35 Ill. Adm. Code 742.415(b)(2).

    c. For any constituents that exhibit elevated background concentrations that cannot be excluded from consideration as COCs by way of a background evaluation, additional Tier 2 evaluations may be conducted (assuming that the requirements necessary to allow the use of 35 Ill. Adm. Code Part 742 risk assessment have been met). Under these circumstances, the extent of groundwater contamination would be defined as the area(s) where COC concentrations exceed background based GROs.

    d. The facility must meet the requirements of 35 Ill. Adm. Code 742, Subpart J to exclude the groundwater ingestion pathway for any COCs evaluated under Tier 2.

15. As investigation of groundwater proceeds at the facility, it may be necessary to include additional groundwater constituents to meet the requirements of 35 Ill. Adm. Code 742.1015(b)(2).

16. Corrective action activities at this facility must meet the requirements of: (a) the facility's RCRA permit; (2) 35 Ill. Adm. Code 724.201 and 742; and (3) previous Illinois EPA letters regarding corrective action at this facility (Log No. B-142-CA-1 through B-142-CA-19).

17. As can be seen in the attached table, an engineered barrier and associated restrictions are being used at SWMUs 7, 14, 15, 17 and 17. This barrier must meet the requirements of 35 Ill. Adm. Code 742, Subpart K. It must be noted that an institutional control meeting the requirements of 35 Ill. Adm. Code 742, Subpart J must be met when an engineered barrier is used in developing remediation objectives for a project.

    A detailed description of the proposed barriers must be submitted to Illinois EPA by May 1, 2005. The information submitted to Illinois EPA must include: (1) a description of the characteristics and construction details of the barrier; (2) plans and specifications for the barrier; (3) scaled drawing showing the horizontal and vertical boundaries of the barrier; and (4) a demonstration that the proposed barrier meets the requirements of 35 Ill. Adm. Code 742, Subpart K.

18. Remediation objectives for this project have been based on one of the following: (1) industrial/commercial property use; (2) engineered barriers; (3) point of human exposure at a location other than the source; and/or (4) exclusion of exposure routes. In accordance with 35 Ill. Adm. Code 742.1000, an institutional control meeting the requirements of 35 Ill. Adm. Code 742, Subpart J must be established to ensure that these facts do not change in the future, as they were fundamental to the establishment of the approved remediation objectives.

    A proposed institutional control meeting the requirements of 35 Ill. Adm. Code 742, Subpart J must be placed on the property must be submitted to Illinois EPA by May 1, 2005. It must be noted that Illinois EPA's internet site (www.epa.state.il.us) contains guidance regarding proposed institutional controls, including a model environmental land use control. This institutional control must:

    a. Restrict future use of the site to commercial/industrial activities (necessary for SWMUs 5, 10, 12 and 19);

    b. Require maintenance of an engineered barrier and restrict SWMUs 7, 14, 15, 16 and 17; and

    c. Requires maintenance of the final cover over SWMU 1 and restricts exposure to the material remaining at that unit.

19. The institutional control for an engineered barrier for SWMUs 7, 14, 15, 16 and 17 and for the final cover at SWMU 1 must be developed in accordance with 35 Ill. Adm. Code 742, Subpart J and must also clearly include the following information and restrictions:

a. A statement that contaminated soil/material is present at the site, but does not pose a threat to human health or the environment, provided an engineered barrier or cover remains over it and the restrictions set forth in the institutional control are met;

b. A scaled drawing showing the boundaries of the required engineered barrier or cover placed over the contaminated soil/material, relative to the property boundaries at the site;

c. A description of the construction details of the required engineered barrier or cover placed over the contaminated soil/material;

d. A requirement that the engineered barrier or cover in place over the contaminated soil/material of concern properly maintained in a future;

e. A requirement that a site safety plan meeting the requirements of 29 CFR be developed and implemented any time construction/excavation work takes place in the contaminated soil/material present beneath the engineered barrier. Among other things, this plan must properly restrict worker exposure and any other person's exposure to the contaminated soil/material;

f. A requirement that any soil removed from beneath the engineered barrier be managed in accordance with 35 Ill. Adm. Code, Subtitle G: Waste Disposal.

20. 35 Ill. Adm. Code 742.1010(d)(8) requires that an ELUC contain scaled maps which show information about the facility, any remaining contamination at the facility and any physical features at the facility to which the ELUC applies.

a. The required scaled site maps must specifically show:

(1) The legal boundary of the property to which the ELUC applies;

(2) The horizontal and vertical extent of contaminants of concern above applicable remediation objectives for soil and groundwater to which the ELUC applies;

(3) Any physical features to which an ELUC applies (e.g., engineered barriers, monitoring wells, caps); and

(4) The nature, location of the source, and direction of movement of the contaminants of concern.

b. Exhibit B of the model ELUC developed by Illinois EPA is comprised of the maps necessary to meet the requirements of 35 Ill. Adm. Code 742.1010(d)(8). In developing such an exhibit for an ELUC associated with an engineered barrier or industrial/commercial land use restrictions:

(1) If only one drawing is used to present all the required information, then it must be clearly labeled as Exhibit B to the ELUC in question. Many times however, it will be necessary to include more than one drawing in Exhibit B to meet the requirements of the requirements of 35 Ill. Adm. Code 742.1010(d)(8). In such cases, each map shall be given a unique Exhibit number (i.e., Exhibit B-1, B-2, B-3, etc.) and labeled as such.

(2) A cover sheet must be provided for the exhibit which: (a) lists the types of scaled maps that must be provided in the ELUC as required in 35 Ill. Adm. Code 1010(d)(8); (b) identifies the map within the exhibit which addresses the individual requirements of 35 Ill. Adm. Code 742.1010(d)(8)(A), (B), (C) and (D); and (c) lists the maps which comprise the exhibit by name and number.

(3) The Real Estate Tax Index/Parcel Index Number (PIN) of the property in question must be contained on each map in Exhibit B.

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

Work required by this letter, your submittals 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 corrective action at the facility please contact William T. Sinnott, II at 217/524-3310. If you have any questions regarding groundwater issues please contact Scott Kaufman at 217/785-6869.

Sincerely,

Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

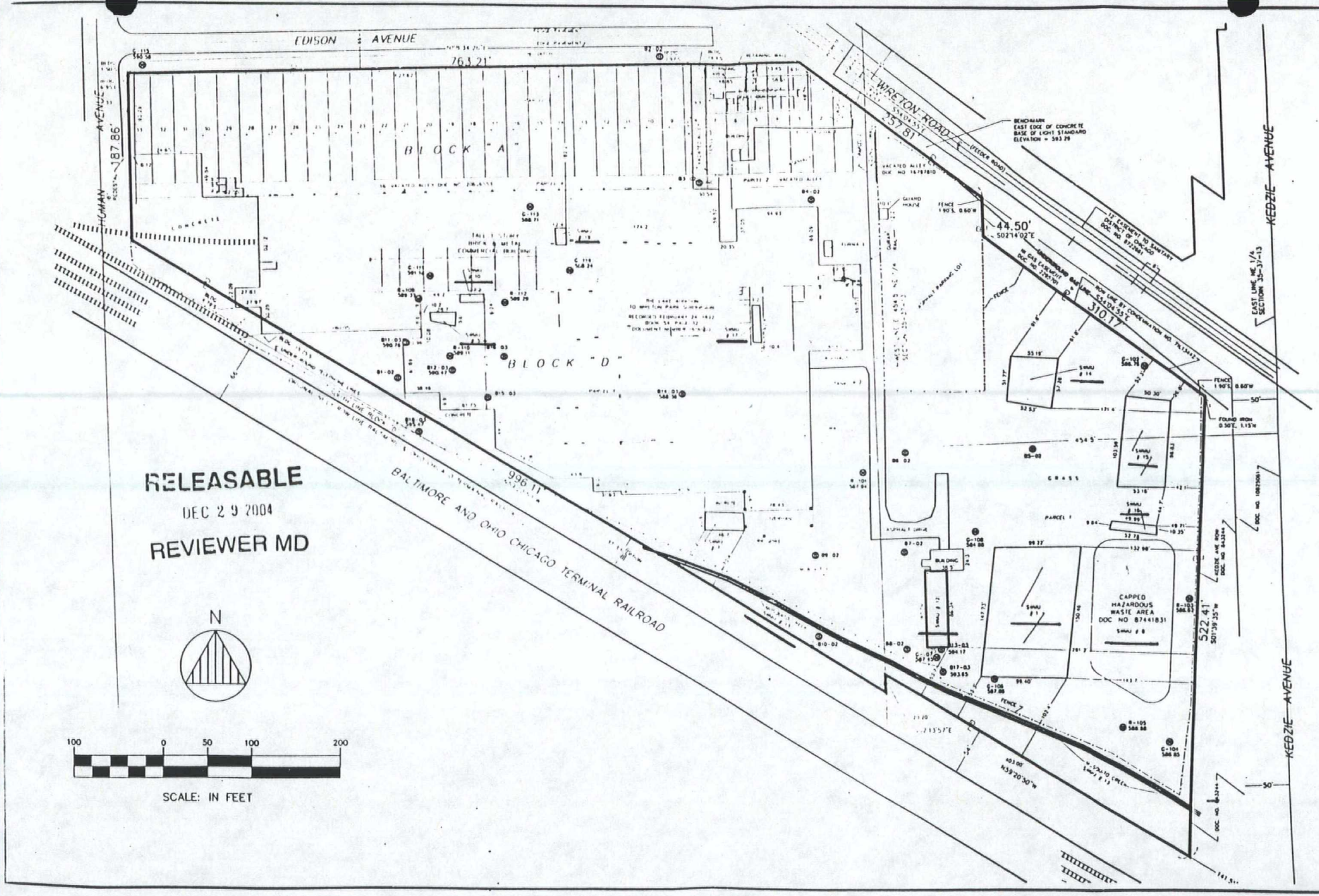
JLM:WTS:bjh\053542s.doc
JLM OSK BM

Attachments: Facility Layout Map
Corrective Action Status of the SWMUs of Concern at Vision Properties

cc: Harriet Croke—USEPA Region V
Mahlon T. Hewitt III

Corrective Action Status of the Various SWMUs of Concern at Vision Properties
B-149-CA-20

SWMU No. /Name	Status of Corrective Action Efforts
1--Closed (pre-RCRA) Surface Impoundment	Per 1/29/99 letter: (1) unit properly closed as a landfill; (2) institutional control needed to reflect fact unit is a closed disposal unit and establish appropriate restrictions; and (3) post-closure care must be provided (cover maintenance and groundwater monitoring). Groundwater investigation/monitoring efforts have been and continues to be carried out in accordance with plans and reports approved by Illinois EPA.
5--Water Soluble Waste Oil Drum Storage Area	Per 7/21/00 letter, no further action needed provided: (1) an institutional control is establish to restrict future use of facility to commercial/industrial activities; and (2) a groundwater investigation and, as necessary, remediation program is completed. Groundwater investigation/monitoring efforts have been and continue to be carried out in accordance with plans and reports approved by Illinois EPA.
7—Scrap Steel Storage Area	Per 1/29/99 letter, engineered barrier and associated institutional control needed for soils remaining at unit.
10—TCE Haz Waste Storage Area at the Production Area	Same as SWMU 5.
12—Wastewater Treatment System	Same as SWMU 5
13--Mosquito Creek	Lead detected at unit. Add'l investigation must be conducted in accordance with Illinois EPA's September 8, 2004 letter. Remediate, as necessary, to meet requirements of 35 Ill. Admin. Code 742. Groundwater investigation/monitoring efforts have been and continue to be carried out in accordance with plans and reports approved by IEPA.
14—Suspected Disposal Area	Same as SWMU 7
15--Landfarm #1	Same as SWMU 7
16--Landfarm #2	Same as SWMU 7
17--Sulfuric Acid Cleaning House	Per 1/29/99 letter, no further action needed if unit is: (1) cleaned; (2) found to be structurally sound; (3) filled with sand; and (4) covered with a concrete cap.
19—TCE Haz Waste Storage Area NE of Production Area	Same as SWMU 5



RELEASABLE

DEC 2 9 2004

REVIEWER MD

ANDREWS ENVIRONMENTAL ENGINEERING INC.
3535 Mayflower Blvd., Springfield, IL 62707
Tel (217) 787-2354 Fax (217) 787-9495

BORING LOCATION

PLANS PREPARED FOR

DATE: AUGUST

PROJECT NO 2001

FILE:

SHEET N

FIG

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR RENEE CIPRIANO, DIRECTOR

217/524-3300

Certified Mail
7002 3150 0000 1220 6058

December 28, 2004

Vision Properties Blue Island, LLC
Attn: Mr. Benjamin L. Kadish, Managing Member
150 North Wacker Drive, Suite 2160
Chicago, Illinois 60606

Re: 0310240004 -- Cook County
Vision Properties Blue Island, LLC (Vision Properties)
(Formerly Gilbert & Bennett Mfg. Co.)
ILD005109525
Log No. B-149-CA-20
Received: August 6, 2004
RCRA Permit

Dear Mr. Kadish:

This is in response to a document entitled "RCRA Phase II Supplemental Investigation" submitted August 5, 2004 by Mahlon T. Hewitt III, LPG, Andrews Environmental Engineering, Inc. (Andrews) on behalf of Vision Properties Blue Island, LLC (Vision Properties). The subject submittal addresses corrective action at several solid waste management units (SWMUs) undergoing corrective action in accordance with Section IV of the facility's RCRA post-closure permit (Log No. B-149) dated September 28, 1995.

The Illinois EPA has determined that it can approve the above-referenced submittal subject to the following conditions and modifications:

1. The SWMUs of concern at this facility are as follows:

   a. SWMU 1—Closed (pre-RCRA) Surface Impoundment

   b. SWMU 2—Water Soluble Waste Oil Drum Storage Area

   c. SWMU 7—Scrap Steel Storage Area

   d. SWMU 10—Trichloroethylene Hazardous Waste Storage Area in Production Area

   e. SWMU 12—Wastewater Treatment System

f. SWMU 13—Mosquito Creek

g. SWMU 14—Suspected Disposal Area

h. SWMU 15—Landfarm No. 1

i. SWMU 16—Landfarm No. 2;

j. SWMU 17—Sulfuric Acid Cleaning House

k. SWMU 19—Trichloroethylene Hazardous Waste Storage Area Northeast of Production Area

A drawing showing the location of each of these units within the facility is attached. In addition, a table summarizing the current status of corrective action efforts at each of these SWMUs is also attached.

2. The Solid Waste Management Unit referred to as Mosquito Creek cannot be considered clean closed at this time. Lead contamination above Tier 1 levels set forth in 35 Ill. Adm. Code 742 has been found at this unit. A plan to conduct further investigation at this unit was approved by Illinois EPA on September 8, 2004. Once the contamination at this unit has been adequately characterized, it will be necessary for Vision Properties to take appropriate action to ensure the contaminant levels remaining at this unit meet the requirements of 35 Ill. Adm. Code 742.

3. The SPLP results for soil samples collected and analyzed for metals which are presented in Table 3 indicate that the detection limit is higher than the remediation objectives found in 35 Ill. Adm. Code 742. As such, it appears as though the soil samples must be collected and analyzed again.

4. Based on boring logs and geologic cross-sections provided in the subject submittal, the Illinois EPA concurs with the facility's conclusion that the site was constructed on top of historical fill material, and that the fill material is laterally extensive across the site.

5. The Illinois EPA does not consider SPLP results to be directly comparable to 35 Ill. Adm. Code 742 Tier 1 GROs and thus does not concur with the discussion of those comparisons in Section 3.2 of the subject submittal or the analytical result comparisons as presented in Table 5 of the subject submittal.

6. The Illinois EPA has determined that, at this time, it cannot approve the facility's request to delete chloride, sulfate, iron, manganese, nickel and zinc from groundwater

monitoring at SWMUs 1, 5, 10, 12, 13 and 19 or the capped hazardous waste area (regulated unit) based on 35 Ill. Adm. Code 620.420(a)(3). This is due to the following:

a. The boring logs and geologic cross-sections provided in the subject submittal indicate that the uppermost aquifer at the facility extends to greater than 10 ft below the original land surface and possesses additional criteria specified in 35 Ill. Adm. Code 620.210. This information indicates that groundwater at the facility is appropriately classified as Class I Groundwater in accordance with 35 Ill. Adm. Code Part 620. The groundwater parameter monitoring exemption discussed in 35 Ill. Adm. Code 620.420(a)(3) applies to Class II Groundwater only.

b. The facility has not adequately demonstrated that these groundwater contaminants are not the result of releases from sources other than the SWMUs or the regulated unit. The Illinois EPA acknowledges that the facility has been working to complete a background evaluation pursuant to 35 Ill. Adm. Code 742.410 as required by Condition 4 of the November 13, 2003 Illinois EPA letter (Log No. B-149-CA-15, 16 and 18). The statistical demonstration discussed in Section 3.4 of the subject submittal is not appropriate to meet the requirements of 35 Ill. Adm. Code 742.410. Therefore, that evaluation has yet to be completed, and as a result, not enough information is available to make that determination.

c. Requests to remove parameters from the groundwater monitoring requirements for the regulated unit must be in the form of requests to modify Section II of the Permit through a permit modification request.

7. The Illinois EPA has determined that, at this time, it cannot approve the facility's request to delete cadmium, chromium and lead from groundwater monitoring at SWMUs 1, 5, 10, 12, 13 and 19 or the capped hazardous waste area based on currently observed background concentrations. This is due to the following:

a. The Illinois EPA does not concur with the following statement on Page 13 of the subject submittal:

> "… a comparison of the parameters cadmium, chromium and lead to that found in the background or upgradient well G115 reveals that the background concentration of these parameters appear to be greater than that found on-site."

This statement is not totally accurate. While it appears true for chromium and lead based on First and Second Quarter 2004 groundwater results, historically

their concentrations tend to be about an order of magnitude higher at well G-110 than concentrations detected so far at well G-115. As discussed in Condition 7.c below, an appropriate background evaluation for these parameters has yet to be completed by the facility. Additionally, the statement quoted above has been true for cadmium in eastern portions of the facility, but not the vicinity of well R-110. At that well, cadmium has consistently been detected at concentrations several orders of magnitude higher than observed so far at well G-115.

b. The Illinois EPA does not concur with the following statement from Page 13, paragraph 3 of the subject submittal:

> "... it is Andrews Engineering opinion that the ubiquitous nature of the parameters of concern provide sufficient evidence to document that the groundwater impacts are not from the remaining SWMUs."

The Illinois EPA acknowledges that information provided in the subject submittal indicates that many of these contaminants are relatively widespread across the facility. However, widespread distribution is not in and of itself sufficient evidence to demonstrate that groundwater impacts are not from any of the SWMUs. The facility must adequately demonstrate that concentrations of contaminants in downgradient wells are not the result of releases from the SWMUs or the regulated unit. This has yet to be accomplished for the units in question.

c. As discussed in Comment 6.b above, the Illinois EPA acknowledges that the facility has been working to complete a background evaluation pursuant to 35 Ill. Adm. Code 742.410 as required by Condition 4 of the November 13, 2003 Illinois EPA letter (Log No. B-149-CA-15, 16 and 18). The statistical demonstration discussed in Section 3.4 of the subject submittal is not appropriate to meet the requirements of 35 Ill. Adm. Code 742.410. Therefore, that evaluation has yet to be completed, and as a result, not enough information is available to make that determination.

d. Requests to remove parameters from the groundwater monitoring requirements for the regulated unit must be in the form of requests to modify Section II of the Permit through a permit modification request.

8. Based on Conditions 6 and 7 above, the Illinois EPA has determined that, at this time, it cannot approve the facility's request for a No Further Action (NFA) determination for groundwater at SWMUs 1, 5, 10, 12, 13, and 19.

9. The facility must continue the background evaluation for cadmium, chromium, iron, lead, manganese, nickel, zinc, chloride and sulfate in accordance with Condition 4 of the November 13, 2003 Illinois EPA letter.

10. By February 15, 2005, the facility must submit a report of the results of the background evaluation discussed in Condition 7 above. The report must be submitted as a request to modify corrective action activities at the facility. It must include, but not be restricted to the following information:

    a. Identification of the reason for the subject submittal;

    b. A discussion of the statistical method employed in the background analysis;

    c. Derived background values for the COCs in question and calculations used to determine those values;

    d. A summary in tabular form of analytical data used in the evaluation, including the appropriate Tier 1, Class I GRO and the derived background value for each COC;

    e. Isoconcentration maps for each COC depicting the extent of contamination exceeding appropriately derived background concentrations; and

    f. A course of action based on the evaluation results.

11. The facility must continue semi-annual groundwater monitoring at SWMUs 1, 5, 10, 12, 13 and 19 in accordance with Conditions 2.a through 2.g of the November 13, 2003 Illinois EPA letter.

12. The November 13, 2003 Illinois EPA letter (Log No. B-149-CA-15, 16 and 18) conditionally approved a Tier 2 evaluation for cis-1,2-DCE, TCE, vinyl chloride, copper, sulfate at SWMUs 5, 10, and 19, as well as zinc at SWMUs 1, 12 and 13. The Illinois EPA thus approves the facility's request to discontinue monitoring for those parameters at the respective SWMUs. Condition 6 of the November 13, 2003 letter, which outlines the steps necessary to eliminate the groundwater ingestion exposure pathway for those COCs, remains outstanding.

13. Considering that historic fill material has been identified to be laterally extensive at the facility, and that 35 Ill. Adm. Code 620.420(a)(3) cannot be applied to groundwater COCs at the facility because of the appropriate groundwater classification, the Illinois EPA wishes to provide the following guidance regarding groundwater:

a. The facility may be able to request excluding some of the remaining groundwater constituents as COCs pursuant to 35 Ill. Adm. Code 742.415(b)(1) by way of the background evaluation required in Comments 8 and 9 above.

b. The facility may request to utilize the derived background values as GROs in accordance with 35 Ill. Adm. Code 742.415(b)(2).

c. For any constituents that exhibit elevated background concentrations that cannot be excluded from consideration as COCs by way of a background evaluation, additional Tier 2 evaluations may be conducted (assuming that the requirements necessary to allow the use of 35 Ill. Adm. Code Part 742 risk assessment have been met). Under these circumstances, the extent of groundwater contamination would be defined as the area(s) where COC concentrations exceed background based GROs.

d. The facility must meet the requirements of 35 Ill. Adm. Code 742, Subpart J to exclude the groundwater ingestion pathway for any COCs evaluated under Tier 2.

14. As investigation of groundwater proceeds at the facility, it may be necessary to include additional groundwater constituents to meet the requirements of 35 Ill. Adm. Code 742.1015(b)(2).

15. Corrective action activities at this facility must meet the requirements of: (a) the facility's RCRA permit; (2) 35 Ill. Adm. Code 724.201 and 742; and (3) previous Illinois EPA letters regarding corrective action at this facility (Log No. B-142-CA-1 through B-142-CA-19).

16 As can be seen in the attached table, an engineered barrier and associated restrictions are being used at SWMUs 7, 14, 15, 17 and 17. This barrier must meet the requirements of 35 Ill. Adm. Code 742, Subpart K. It must be noted that an institutional control meeting the requirements of 35 Ill. Adm. Code 742, Subpart J must be met when an engineered barrier is used in developing remediation objectives for a project.

A detailed description of the proposed barriers must be submitted to Illinois EPA by May 1, 2005. The information submitted to Illinois EPA must include: (1) a description of the characteristics and construction details of the barrier; (2) plans and specifications for the barrier; (3) scaled drawing showing the horizontal and vertical boundaries of the barrier; and (4) a demonstration that the proposed barrier meets the requirements of 35 Ill. Adm. Code 742, Subpart K.

17. Remediation objectives for this project have been based on one of the following: (1) industrial/commercial property use; (2) engineered barriers; (3) point of human exposure at a location other than the source; and/or (4) exclusion of exposure routes. In accordance with 35 Ill. Adm. Code 742.1000, an institutional control meeting the requirements of 35 Ill. Adm. Code 742, Subpart J must be established to ensure that these facts do not change in the future, as they were fundamental to the establishment of the approved remediation objectives.

    A proposed institutional control meeting the requirements of 35 Ill. Adm. Code 742, Subpart J must be placed on the property must be submitted to Illinois EPA by May 1, 2005. It must be noted that Illinois EPA's internet site (www.epa.state.il.us) contains guidance regarding proposed institutional controls, including a model environmental land use control. This institutional control must:

    a. Restrict future use of the site to commercial/industrial activities (necessary for SWMUs 5, 10, 12 and 19);

    b. Require maintenance of an engineered barrier and restrict SWMUs 7, 14, 15, 16 and 17; and

    c. Requires maintenance of the final cover over SWMU 1 and restricts exposure to the material remaining at that unit.

18 The institutional control for an engineered barrier for SWMUs 7, 14, 15, 16 and 17 and for the final cover at SWMU 1 must be developed in accordance with 35 Ill. Adm. Code 742, Subpart J and must also clearly include the following information and restrictions:

    a. A statement that contaminated soil/material is present at the site, but does not pose a threat to human health or the environment, provided an engineered barrier or cover remains over it and the restrictions set forth in the institutional control are met;

    b. A scaled drawing showing the boundaries of the required engineered barrier or cover placed over the contaminated soil/material, relative to the property boundaries at the site;

    c. A description of the construction details of the required engineered barrier or cover placed over the contaminated soil/material;

    d. A requirement that the engineered barrier or cover in place over the contaminated soil/material of concern properly maintained in a future;

Code 1010(d)(8); (b) identifies the map within the exhibit which addresses the individual requirements of 35 Ill. Adm. Code 742.1010(d)(8)(A), (B), (C) and (D); and (c) lists the maps which comprise the exhibit by name and number.

(3) The Real Estate Tax Index/Parcel Index Number (PIN) of the property in question must be contained on each map in Exhibit B.

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

Work required by this letter, your submittals 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 corrective action at the facility please contact William T. Sinnott, II at 217/524-3310. If you have any questions regarding groundwater issues please contact Scott Kaufman at 217/785-6869.

Sincerely,

Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

JLM:WTS:bjh\04311s.doc
JLM OSK TBM

Attachments: Facility Layout Map
Corrective Action Status of the SWMUs of Concern at Vision Properties

cc: Harriet Croke—USEPA Region V (w/o enclosures)
Mahlon T. Hewitt III

Jeanna USEPA

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 Mary A. Gade, Director

217/524-3300

January 29, 1999

CERTIFIED MAIL
P 344 335 322
P 344 335 323

Mr. Richard Brereton
Gilbert & Bennett Manufacturing Company
Vice-President
155A Fernside Drive
Taccoa, Georgia 30577

Mr. John R. Powers, Plant Manager
Gilbert & Bennett Manufacturing Company
3301 Wireton Road
Post Office Box 56
Blue Island, Illinois 60406

Re: 0310240004 -- Cook County
Gilbert & Bennett Manufacturing Company
ILD005109525
Date Received: November 14, 1997
Log No. B-149-CA-3
RCRA Permit

Gentlemen:

The RCRA Facility Investigation (RFI) Phase I Report for the above-referenced facility submitted on your behalf by ENSR Consulting and Engineering has been reviewed by the Illinois EPA. This report was submitted in accordance with Section IV of the RCRA post-closure permit issued for the above-referenced facility (Log No. B-149-M-2) on December 27, 1995. A workplan for conducting a Phase I RCRA Facility Investigation for the eleven solid waste management units (SWMUs) of concern at this facility was approved by Illinois EPA on April 28, 1997.

The RFI Phase I report for the above-referenced facility, which also contained recommended Phase II activities in Section 10, is hereby approved subject to the following conditions and modifications:

1. The RFI Phase I Report described the investigation for possible releases from the eleven SWMUs of concern at the subject facility, as identified in Condition IV.B.1 of the RCRA post-closure permit issued for the Gilbert & Bennett Facility and the attached table entitled "SWMU Status, Gilbert & Bennett, Log No. B-149-CA-3." This attached table also provides a summary of RFI Phase I & II activities at each of these SWMUs.

2. Conditions and modifications regarding the RFI Phase I Report and results are contained in the attached document entitled "Conditions/Modifications for RFI Phase I Report, Gilbert & Bennett, Log No. B-149-CA-3".

3. Conditions and modifications regarding the proposed Phase II activities in Section 10 of the subject submittal are contained in the document entitled "Requirements for RFI Phase II Activities, Gilbert & Bennett, Log No. B-149-CA-3."

4. Gilbert and Bennett will not be required to submit a Phase II RFI Workplan. Gilbert and Bennett should follow the procedures set forth in the Phase I RFI workplan, the Illinois EPA's April 28, 1997 RFI Phase I workplan approval letter, and Section 10 of the subject report and this letter. A report documenting the results of the RFI activities should be submitted to Illinois EPA by July 1, 1999. Additional information regarding the contents of this report can be found in Condition 15 of the attached document entitled "Requirements for RFI Phase II Activities, Gilbert & Bennett, Log No. B-149-CA-3."

Within 35 days after the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the 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 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 this matter, please contact Victoria Broomhead at 217/524-3285 for groundwater related issues and William T. Sinnott, II at 217/524-3310 for other issues associated with this project.

Sincerely,

Theodore J. Dragovich

Theodore J. Dragovich, P.E.
Manager, Hazardous Waste Branch
Permit Section
Bureau of Land

TJD:JKM:bjh\98171S.WPD
bjh SKM jwb

Attachments: SWMU Status
Conditions/Modifications for RFI Phase I Report
Requirements for RFI Phase II Activities

cc: USEPA Region V -- Hak Cho
ENSR

Conditions/Modifications for RFI Phase I Report
Gilbert & Bennett
Log No. B-149-CA-3

An RFI Phase I report for the Gilbert & Bennett Manufacturing Facility in Blue Island, Illinois was received November 14, 1997. This report documented the results of a Phase I RFI conducted in accordance with a workplan approved by Illinois EPA on April 28, 1997 for the following solid waste management units:

SWMU NO.	NAME
1	Closed (pre-RCRA) Surface Impoundment
5	Water Soluble Waste Oil Drum Storage Area
7	Scrap Steel Storage Area
10	Trichloroethylene Hazardous Waste Storage Area at the Production Area
12	Wastewater Treatment System
13	Mosquito Creek
14	Suspected Disposal Area
15	Landfarm 1
16	Landfarm II
17	Sulfuric Acid Cleaning House and Drum Storage
19	Trichloroethylene Hazardous Waste Storage Area Northeast of Production Area

This report is hereby approved subject to the following conditions and modifications:

1. No further soil sampling nor remediation is necessary at **SWMU No 1**; (Closed Pre-RCRA Surface Impoundment) provided:

   a. A survey plat is developed which shows the locations and dimensions of the Closed Pre-RCRA Surface Impoundment, relative to the legal boundaries of the site. The plat must be prepared and certified by a professional land surveyor and be developed with respect to permanently surveyed benchmark.

   b. The survey plat identified in Condition 1.a above must contain a note, prominently displayed, which states that:

      (1) The unit has been used for the disposal of waste.

      (2) The unit has been closed to the satisfaction of the Illinois EPA by the placement of a final cover system consisting of compacted soil and vegetative layer. Post-

closure use of the unit must never be allowed to disturb the integrity of the final cover, liner(s) or any other components associated with the Closed Pre-RCRA Surface Impoundment or the function of the unit's monitoring systems, unless the Illinois EPA determines in writing that the disturbance:

(a) Is necessary to the proposed use of the property, and will not increase the potential hazard to human health or the environment; or

(b) Is necessary to reduce a threat to human health or the environment [35 Illinois Adm. Code 724.217(c)].

c. The survey plat identified in Condition 1.a and 1.b above must be:

a. Attached to the deed for the subject property, or on some other instrument which is normally examined during title search, which will in perpetuity notify any potential purchaser of the property of the requirements set forth in the notation identified in Condition 1.b above.

b. Submitted to the County Recorder, any local zoning authority and any other authority over local land use.

d. A copy of the survey plat required by Conditions 1.a and 1.b above shall be submitted to the Illinois EPA. A certification that the requirements of Condition 1.c have been met must be submitted to the Illinois EPA along with the RFI Phase II report for this facility. This certification must meet the requirements of 35 Ill. Adm. Code 702.126.

e. The final cover over the Pre-RCRA Surface Impoundment shall be inspected on a quarterly basis during the term of the facility's RCRA permit. During this period, corrective action shall be taken if problems, including but not limited to the following are observed during the required inspections:

ponding
cracks in the final cover greater than 1 inch wide
gas problems
odor problems
dead or stressed vegetation
vegetation with taproots growing in areas not so designed
vector problems
silting and erosion of the cover and drainage systems

In addition, the final cover must be inspected after each precipitation event greater than one inch over a 24-hour period. All observations during the inspections and corrective actions taken must be recorded in a log book. This log book shall be available for Illinois EPA review. In addition, all corrective actions taken shall be closely monitored during subsequent inspections.

f. Groundwater monitoring at this unit continues to be carried out in accordance with Section II of the facility's RCRA permit and any other requirements associated with the corrective action program required by the RCRA permit.

2. Low levels of arsenic remain in the soil beneath the Scrap Steel Storage Area **(SWMU No. 7)**. These levels will not pose a threat to human health or the environment and no further action will be required to close the subject unit provided:

   a. A relatively impermeable barrier, such as a concrete or asphalt cap, is in place over these soils;

   b. The barrier is properly maintained in the future;

   c. Restrictions are in place to limit direct human exposure to the soils beneath the cap;

   d. A site safety plan to address possible work exposure to the soil in this area is developed and implemented prior to and during any future excavation/construction activity in this area; and

   e. Any soil removed from this area during future activities is managed as a special waste in accordance with 35 Ill. Adm. Code, Subtitle G: Waste Disposal.

   Restrictions must be placed on the deed to this property to ensure these requirements are met. The procedures for establishing this deed restriction are set forth in Conditions 9, 10 and 11 below.

3. No further soil sampling nor remediation is necessary at **SWMU No. 12**; (Wastewater Treatment System) provided a deed restriction is attached to the deed requiring the facility remain commercial/industrial in accordance with Conditions 9, 10 and 11 below.

4. Sampling the sediment and surface water at **SWMU No. 13**; (Mosquito Creek) in the Spring of 1999 is hereby approved.

5. The integrity inspection performed at **SWMUs 5, 10 and 19** indicated that the cracks in the concrete extend to the soil/gravel interface which indicates soil sampling is necessary. Thus the Phase II RFI activities must include soil sampling/analysis efforts to investigate potential contamination beneath these units.

6. The plan to collect additional soil samples as outlined in Section 10.6 of the subject report for **SWMU Nos. 14, 15 and 16** (Investigation Area No. 1) is hereby approved. These units are also referred to as Disposal Area, Landfarm I and Landfarm II respectively.

7. No RFI Phase I activities took place at **SWMU No. 17**; (Sulfuric Acid Cleaning House Drum Storage). The plan to close this unit in-place is hereby approved. The procedure for closing this unit ins place and for determining if these has been a release from this unit is outlined in Appendix A of the subject report. Prior to placement of sand inside the tanks, the tanks shall be cleaned and inspected in accordance with Condition 8 of the Illinois' April 28, 1997 workplan approval letter. Provided the tanks are structurally sound, the tanks may be filled. Finally, Gilbert & Bennett should place a concrete cap on top of the sand. Documentation of the results of these efforts shall be documented in the RFI Phase II report for this facility.

8. Eight (8) inorganic parameters were detected during the Phase I RFI in excess of either the Class I Groundwater Quality Standard, where it exists, or the level established within the facility's RCRA Permit, in groundwater monitoring wells G106 and G107. Additional investigation of these parameters (see below table) must be carried out. The groundwater quality exceedances shall be addressed in the corrective action required by Condition IV.D of the facility's Part B Permit (Log # B-149).

Constituent	G106	G107	Class I Standard	Permit Level
Chloride	334 mg/L	2,130 mg/L	200 mg/L	208 mg/L
Sulfate	1,710 mg/L	1,120 mg/L	400 mg/L	151 mg/L
TDS	3,700 mg/L	8,900 mg/L	1,200 mg/L	
Calcium	810,000 ug/L	1,210,000 ug/L		166,000 ug/L
Iron	31,800 ug/L	33,400 ug/L	5,000 ug/L	6,700 ug/L
Magnesium	297,000 ug/L	338,000 ug/L		4,520 ug/L
Manganese	1,720 ug/L	3,810 J ug/L	150 ug/L	160 ug/L
Sodium	27,100 ug/L	304,000 ug/L		

9. As part of the corrective action activities, a survey plat must be developed which shows the location and dimensions of the closed Pre-RCRA Surface Impoundment (SWMU No. 1) Scrap Steel Storage Area (SWMU No. 7) and the Wastewater Treatment System (SWMU No. 12), relative to the legal boundaries of the site. The plat must be prepared and certified by a professional land surveyor and be developed with respect to permanently surveyed benchmark.

10. The survey plat identified in Condition 10 above must contain a note, prominently displayed, which states that:

    a. A solid waste management unit commonly referred to as the Scrap Steel Storage Area was once present at the facility. This area was remediated in accordance with an Illinois EPA approved closure plan. The Illinois EPA determined that the area was properly remediated and that no further action was necessary, so long as this note was placed in the deed to the property and the requirements set forth in this note are met.

        (1) Low levels of arsenic remain in the soils beneath the area.

        (2) The low levels of contaminants in the soils beneath the area pose no threat to human health and the environment provided:

            (a) A concrete cap or some other type of cover is in place over the area;

            (b) The cover is properly maintained;

            (c) Access to the area is restricted so that humans will not come into direct contact with the soils remaining beneath the area.

            (d) A site survey plan to address possible worker exposure to the soils in this area must be developed and implemented for any future excavation/construction activities in this area.

            (e) Any soil removed from the area during future activities must be managed as a special waste in accordance with 35 Ill. Adm. Code Subtitle G: Waste Disposal.

    b. The solid waste management unit referred to as the Wastewater Treatment System require no further soil sampling nor remediation provided the land use remain industrial/commercial.

11. The survey plat identified in Condition 9 and 10 above must be:

    a. attached to the deed for the subject property, or on some other instrument which is normally examined during title search, which will in perpetuity notify any potential purchaser of the property of the requirements set forth in the notation identified in Condition 10 above;

    b. submitted to the County Recorder, any local zoning authority and any other authority over local land use

12. A copy of the survey plat required by Conditions 9 and 10 above and documentation that the requirements of Condition 11 above have been met must be included in the RFI Phase II report for this facility.

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SWMU Status
Gilbert & Bennett
Log No. B-149-CA-3
January 1999

This document summarizes the RFI Phase I results and Phase II requirements for the eleven SWMUs of concern at the Gilbert & Bennett facility. The number in parentheses at the end of the description of Phase I activities refers to the condition in the document entitled "Conditions/Modifications for RFI Phase I Report" where this unit is further discussed. The number in parentheses at the end of the description of the Phase II requirements refers to the condition in the document entitled "Requirements for RFI Phase II Activities" where this unit is further discussed.

SWMU No.	Name	Phase I and II Status
1	Closed Pre-RCRA Surface Impoundment	Ph I -- soil investigation; cap evaluation (Condition 1) Ph II -- deed restriction, post-closure care (Condition 9)
5	Water Soluble Waste Oil Drum Storage Area	Ph I -- integrity inspection (Condition 5) Ph II -- soil investigation (Condition 1)
7	Scrap Steel Storage Area	Ph I -- soil investigation (Condition 2) Ph II -- engineered barrier, deed restriction (Condition 9)
10	TCE Hazardous Waste Storage Area at Production Area	Ph I -- integrity inspection (Condition 5) Ph II -- soil investigation (Condition 1)
12	Wastewater Treatment System	Ph I -- soil investigation (Condition 3) Ph II -- deed restriction (Condition 9)
13	Mosquito Creek	Ph I -- sediment sampling (Condition 4) Ph II -- soil and sediment investigation (Condition 4)
14	Suspected Disposal Area	Ph I -- limited soil investiagtion (Condition 6) Ph II -- additional soil investigation (Condition 2)
15	Landfarm I	Ph I -- limited soil investigation (Condition 6) Ph II -- additional soil investigation (Condition 2)
16	Landfarm II	Ph I -- limited soil investigation (Condition 6) Ph II -- additional soil investigation (Condition 2)
17	Sulfuric Acid Cleaning House and Drum Storage	Ph I -- no activities (Condition 7) Ph II -- close in place (Condition 3)
19	TCE Haz Waste Storage Area NE of Production Area	Ph I -- integrity 8inspection (Condition 5) Ph II -- soil investigation (Condition 1)
	Groundwater	Ph I -- sampling (Condition 8) Ph II -- additional investigation (Conditions 5-8)

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Requirements for RFI Phase II Activities
Gilbert & Bennett
Log No. B-149-CA-3

This document has been developed to identify the required RFI Phase II activities for the Gilbert & Bennett facility in Blue Island, Illinois to meet the corrective action requirements set forth in Section IV of the facility's RCRA permit (Log No. B-149). The goal of these activities is to further investigate potential contamination present at several solid waste management units at the facility and to take certain action in response to the results of a Phase I RFI conducted at the facility.

Section IV of the RCRA permit issued to the Gilbert & Bennett facility (Log No. B-149) required the facility to conduct corrective action, as necessary at 11 solid waste management units (SWMUs). This permit set forth a two step process for carrying out these corrective action requirements: (1) conduct a RCRA Facility Investigation (RFI) to characterize any contamination which may be present at these SWMUs; and (2) complete a Corrective Measures Program in response to the contamination detected during the RFI, as necessary to protect human health and the environment. Fore ease of implementation, the permit broke down each of these steps into a series of phases.

A Phase I RFI workplan for the 11 SWMUs of concern at the Gilbert & Bennett facility was approved by Illinois EPA on April 28, 1997. A report documenting the results of these Phase I activities was received by Illinois EPA on November 14, 1997. Section 10 of this report also contained proposed activities for a Phase II RFI. Illinois EPA's conditional approval of the Phase I report is set forth in a document entitled "Conditions/Modifications for RFI Phase I Report, Gilbert & Bennett, Log No. b-149-CA-3".

The proposed RFI Phase II activities for the Gilbert & Bennett facility, as set forth in Section 10 of the RFI Phase I report are hereby approved subject to the following conditions and modifications:

1. Joints, cracks or other defects were found during the Phase I RFI in **SWMUs 5, 10 and 19** which would potentially allow hazardous waste or hazardous constituents to migrate through the base, then soil samples <u>must</u> be collected from beneath the joint/crack/defect to determine if hazardous waste or hazardous constituents have been released to the underlying soil. This sampling/analysis effort shall be carried out either during the Phase II RFI in accordance to the below listed procedures.

    a. In general samples must be collected from at least one location along <u>each</u> joint or crack that provides a potential for hazardous waste or hazardous constituents to migrate to underlying soil: unless several cracks/joints are present, then the large cracks/joints located near the more probable contaminated locations should be selected for sampling the underlying soils. If the crack/joint is more than approximately 10' long, then

samples in general must be collected from along the crack/joint at approximately 10' intervals to demonstrate that no contaminants migrated to the soils beneath them. Such locations shall be biased to stained areas or low-lying areas where spills would tend to accumulate.

b. In general, samples must be from 3"-9" below the backfill/natural soil interface at each location. Collection and analysis of each sample shall be carried out in accordance with the procedures set forth in this letter.

c. Samples collected from SWMU 5 must be analyzed for the inorganic parameters and VOCs referred to in Condition 4. Samples collected from SWMUs 10 and 19 must be analyzed for VOC totals by Method 8240 of SW-846.

d. Collection and analysis of these samples shall be carried out in accordance with the procedures set forth in this letter.

2. The plan to collect additional soils as outlined in Section 10.6 of the subject report for **SWMUs 14, 15 and 16** is hereby approved.

3. The plan to close **SWMU 17** in-place is hereby approved and must be carried out during RFI Phase II activities. The procedures for closing this unit and for determining if there has been a release from this unit is outlined in Attachment A to the RFI Phase I. Prior to placement of sand inside the tanks, the tanks shall be cleaned and inspected in accordance with Condition 8 of Illinois EPA's April 28, 1997 RFI Phase I workplan approval letter. Provided the tanks are structurally sound, they may be filled. Finally, Gilbert & Bennett should place a concrete cap on top of the sand.

4. The sediment and surface water sampling proposed for **SWMU 13** (Mosquito Creek) is hereby approved.

5. The proposed Phase II well shall be installed at the location depicted on Figure 10-1. This new well shall be designated as groundwater monitoring well G108 and shall be installed so that the screened interval intercepts the water table. This newly installed groundwater monitoring well shall be constructed of the same materials as the previous two wells (G106 and G107), and shall be properly developed.

   The Illinois EPA requests the facility submit the completed boring log, well completion and well development forms within thirty (30) days of the date of well installation.

6. Newly installed groundwater monitoring well G108 shall be sampled and analyzed for the list of constituents included in Table 5-1, page 5-5 of the Illinois EPA approved Sampling and Analysis Plan (included as part of the Phase I RFI Workplan). In addition to the sixteen (16) constituents included in Table 5-1, the facility shall also sample this well for the parameters listed in 35 Ill. Adm. Code 620.410, for this initial sampling event only.

7. The facility shall sample the two other RFI wells (G106 and G107) at the same time as the newly installed well is sampled. These two wells shall be sampled for all constituents listed above in Condition 6 except for the following: PCB's, pesticides/herbicides, carbamates, total phenolics, cyanide and the radionuclides).

8. In addition to the sampling requirements in conditions 6 and 7 above, the facility shall collect groundwater level elevations from each well at the facility as part of the Phase II investigation. This information should then be used to construct a new potentiometric/groundwater flow map.

9. Phase II activities must include the development and recording of the survey plat deed restrictions for the Closed Pre-RCRA Surface Impoundment (SWMU No. 1), the Scrap Steel Storage Area (SWMU No. 7) and the Wastewater Treatment System (SWMU No. 12), as required by Conditions 1, 2 and 3 of the document entitled "Conditions/Modifications for RFI Phase I Report. The other requirements for SWMU No. 1 set forth in the RFI Phase I report approval document must continue to be carried out during the term Gilbert & Bennett's RCRA permit.

10. All soil, sediment, surface water, and groundwater samples to be analyzed in the lab shall be analyzed individually (i.e., no compositing). The soil samples shall be analyzed for the constituents listed in Table 4-2 of the subject submittal. Analytical procedures shall be conducted in accordance with Test Methods for Evaluating Solid Wastes, Third Edition, and all finalized updates (SW-846). When a SW-846 analytical method is specified, all the chemicals listed in the Quantitation Limits Table for that method shall be reported unless specifically exempted in writing by the Illinois EPA. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed. Also note that all inorganic parameters listed in Table 4-1 of the RFI Phase I workplan (in addition to barium and zinc) of the subject submittal must be analyzed in the soil, sediment, and surface water samples and must be analyzed for totals, and the pH of the samples must also be noted. All volatile organic compounds (VOCs) should be analyzed using totals by Method 8260 of SW846. Note that the Illinois EPA's TACO Guidance document lists Tier 1 cleanup objectives for VOC totals and total metals (using pH values). The detection limits for those samples required to be analyzed for VOCs must also be as low as those identified in SW846 of Method 8260.

11. The following procedure must be utilized in the collection of all required samples:

    a. The procedures used to collect soil samples must be sufficient so that all soil encountered is classified in accordance with ASTM Method D-2488.

    b. If a drill rig or similar piece of equipment is necessary to collect required soil samples, then:

        (1) The procedures specified in ASTM Method D-1586 (Split Spoon Sampling) or D-1587 (Shelby Tube Sampling) must be used in collecting the soil samples.

        (2) Soil samples must be collected continuously at several locations to provide information regarding the shallow geology of the area where the investigation is being conducted;

    c. All soil samples which will be analyzed for volatile organic compounds (VOCs) must be collected in accordance with Attachment 7 of the Illinois EPA's RCRA closure plan instructions. Note that sediment, surface water and groundwater samples must be collected and handled in such a way that minimizes the loss of VOCs in that sample (i.e., no stirring of the sample).

    d. Soil and sediment samples not collected explicitly for VOC analysis should be field-screened for the presence of VOCs at all locations and the results recorded within the Phase 1 report;

    e. All soil, sediment, groundwater, and surface water samples must be collected in accordance with the procedures set forth in SW-846; and

    f. When visually discolored or contaminated material exists within an area to be sampled, horizontal placement of soil, sediment and surface water sampling locations shall be adjusted to include such visually discolored and/or contaminated areas. Sample size per interval shall be minimized to prevent dilution of any contamination.

12. Quality assurance/quality control procedures which meet the requirements of SW-846 (Third Edition and all finalized updates) 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.

13. As sampling efforts progress at Gilbert & Bennett Manufacturing Company, the number of parameters necessary to be analyzed from a given sample may be reduced with Illinois EPA approval as sampling results may indicate later that certain parameters will not be a concern.

14. The Health and Safety Plan contained in the subject workplan is neither approved nor disapproved. 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.

15. RFI Phase II activities should be completed by May 1, 1999. When Phase II are complete, the owner or operator must submit to the Illinois EPA certification both by a responsible officer of the owner or operator and by an independent registered professional engineer that the facility completed Phase II in accordance with the specifications in the conditionally approved RFI Phase II workplan. In addition, a certification statement meeting the requirements of 35 IAC 702.126 must be provided by a responsible officer of the laboratory which conducted the chemical analyses that the requirements of this letter were met during the chemical analysis of all samples. This certification must address the applicable sample collection, preservation, handling preparation and analytical requirements set forth in this letter. These certifications must be received at the Illinois EPA by July 1, 1999. These dates may be extended if Gilbert & Bennett submits information to the Illinois EPA indicating that it is attempting to complete the required activities in a timely manner but needs additional time to complete the investigation.

    The attached certification forms must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the RFI. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity.

    The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5105 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Section 1). Therefore, any certification or

engineering services which are performed for a RFI workplan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, Section 13.1 of the Illinois Professional Engineering Act.

A report documenting the results of Phase II activities must also be developed and submitted to Illinois EPA for review and approval. This report should include:

a. Background information about the overall facility and its RCRA corrective action program activities;

b. A description of the SWMUs investigated (include scaled maps showing locations of SWMUs within facility and layout of SWMUs; information regarding the construction and operation of the SWMUs' identification of wastes managed in the SWMUs;

c. A general description of the Phase II activities and what was accomplished as a result of completing these activities;

d. The information identified in the attached document entitled Recommended Contents of RCRA Soils and/or Groundwater Investigation Reports.

e. Information which the workplan indicates will be in the report;

f. A chronological summary of Phase II activities and the cost involved.

g. Color photo documentation of Phase II activities.

h. A description of the qualifications of personnel performing and directing the RFI activities including contractor personnel.

i. The information required by condition;

j. A general discussion of the activities which should be carried out to complete the corrective action requirements of Gilbert & Bennett's RCRA permit.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Illinois EPA by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control -- #33
Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

16. If the Illinois EPA determines that implementation of this RFI Workplan fails to satisfy the requirements of Section IV of the RCRA Permit (Log No. B-149), the Illinois EPA reserves the right to require that additional work be completed to satisfy these requirements. Revisions of RFI Workplans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.

Attachments: Certification Statement
Laboratory Certification Statement

JKM:bjh\9882S.WPD

Certification Statement
Phase II of the RCRA Facility Investigation
Gilbert & Bennett Manufacturing Company
3301 Wireton Road, Blue Island, Illinois 60406
Log No. B-149-CA-3

Upon completion of Phase II of the RFI, this statement is to be completed by both a responsible officer of the owner or operator (as defined in 35 IAC 702.126) and by the registered professional engineer overseeing all work associated with the investigation. Submit one copy of the certification with original signatures and three additional copies.

RFI Phase II activities at the facility described in the RFI Phase II Workplan have been completed in accordance with the specifications in the approved RFI Workplan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number		Facility Name
Signature of Owner/Operator	Date	Name and Title
Signature of Registered P.E.	Date	Name of Registered P.E. and Illinois Registration Number

Mailing Address of P.E.:

Registered P.E.'s Seal:

ECB:WTS:bjh\98511S.WPD

Laboratory Certification Statement
Phase II of the RCRA Facility Investigation
Gilbert & Bennett Manufacturing Company
3301 Wireton Road, Blue Island, Illinois 60406
Log No. B-149-CA-3

Upon completion of Phase II of the RFI, this statement is to be completed by both a responsible officer of the owner or operator (as defined in 35 IAC 702.126) and (2) a responsible officer (as defined in 35 IAC 702.126) of the laboratory which conducted the chemical analyses required as part of Phase II of the RFI. The original of this statement shall accompany the original certification statement for the overall Phase II activities and the RFI Phase II Report.

The sample collection, handling, preservation, preparation and analysis conducted as part of Phase II of the RFI at the facility described in this document has been conducted in accordance with the specifications in the approved workplan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number	Facility Name
Signature of Owner/Operator Date	Name and Title of Owner/Operator Representative
Name of Laboratory	Signature of Laboratory Responsible Officer Date
Mailing Address of Laboratory:	
	Name and Title of Laboratory Responsible Officer

ECB:WTS:bjh\98511S.WPD

B-149-CA-1

Gilbert & Bennett cc: Maywood
ILD005109525 USEPA

JR

JKM
MGS

ENSR

Consulting • Engineering • Remediation

740 Pasquinelli Drive
Westmont, IL 60559

(630) 887-1700
FAX (630) 850-5307

August 28, 1997

ENSR Project No: 3078-001-810

Mr. Greg Saunders
Permit Section
Bureau of Land
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62794-9276

RECEIVED
AUG 29 1997
IEPA-BOL
PERMIT SECTION

SUBJECT: Request for Extension for Submittal of Phase I RFI Report
Gilbert & Bennett Manufacturing Company - Blue Island Facility
Permit# B-149-M-1

Dear Mr. Saunders:

This letter is written pursuant to the telephone conversation you had with Mr. Joe Kang regarding the need for a forty-five (45) day extension for submittal of the Phase I RFI Report for the above-referenced facility.

Pursuant to Section 2 of the IEPA's April 28, 1997 letter approving the RFI Phase I Workplan, Gilbert & Bennett may request an extension of the September 1, 1997 due date for the report if it demonstrates to the IEPA that it is carrying out the Phase I RFI in a timely manner but needs additional time to complete all required activities. The attached schedule shows that Gilbert & Bennett has been carrying out Phase I RFI activities in a timely manner. Our original schedule anticipated that we would receive laboratory results within two weeks of submitting samples to the laboratory for analysis. However, it has taken from three to five weeks to obtain results from the laboratory. As a result, we will be unable to submit the report by September 1, 1997. Accordingly, we hereby request a forty-five (45) day extension for submittal of the Phase I RFI Report to the Agency.

Based upon telephone conversations with yourself and Ms. Victoria Broomhead and the granting of the extension, the report will be submitted to the Agency by October 15, 1997.

If you have any questions please call me at (630)887-1700.

Sincerely,

Mark McGlathery

Mark McGlathery

Reference No. 97-08-B373

ATTACHMENT 1

COMPLETION OF PHASE I RFI ACTIVITIES

ENSR

Completion of Phase I RFI Activities

Task	Completion Date
Mobilization	6/9/97 to 6/20/97
Soil Sampling (SWMUS 1,2,12,7 and IA1)	6/25/97 to 6/27/97 and 6/30/97
Monitoring Well Installation	6/25/97 to 6/27/97 and 6/30/97
SWMU 1 Cap Investigation (Completed pursuant to permit condition)	6/25/97 to 6/27/97 and 6/30/97
Monitoring Well Development	7/3/97
Groundwater Sample Collection	7/14/97
SWMU Structural Integrity Evaluation	7/17/97 to 7/18/97 and 7/21/97 to 7/22/97
Hydraulic Conductivity Testing	7/30/97 to 7/31/97
Sample Analysis (Groundwater & Sediment)	ONGOING - (Due 8/15/97)

B-149-CA-1

cc: Maywood
USEPA

Juana JKM MGS

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February 25, 1997

Mr. Greg Saunders
Permit Section
Bureau of Land
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62794-9276

RECEIVED
FEB 27 1997
IEPA-BOL
PERMIT SECTION

SUBJECT: Conditional Approval of the RCRA Facility Investigation Phase I Workplan for Gilbert & Bennett's Blue Island, Illinois Facility

Dear Mr. Saunders:

In order to provide a basis for discussion during our upcoming meeting regarding the subject workplan, the Gilbert & Bennett Manufacturing Company submits the following comments with respect to your conditional approval received December 23, 1996:

Condition 1

The purpose of the RCRA Facility Investigation (RFI) is to determine whether releases of hazardous wastes and hazardous constituents have occurred from the SWMUs at the facility, and if so, the nature and extent of releases. (See Permit Section IV.A) Section IV.B.6.b of the permit requires further investigation if the Agency determines that data associated with a given SWMU is inconclusive. This section does not set forth the purpose of the Phase I investigation as demonstrating "conclusively" whether or not hazardous wastes or hazardous constituents have been released from the SWMUs.

Condition 2

RFI Phase I activities will be completed within 270 days of the Agency's final approval of the RFI Workplan in accordance with the schedule set forth in the Project Management Plan. Certifications will be sent to the Agency within 60 days of completion of Phase I.

Condition 4

Table 4-1 of the RFI Workplan's sampling and analysis plan lists the following soil sampling target parameters: arsenic, cadmium, chromium, iron, and lead. These parameters were chosen based upon historical information regarding the type of waste managed by each of the SWMUs requiring surface soil investigation. SW-846 (Third Edition) analytical method 6010A is specified in the workplan for these parameters.

Gilbert & Bennett will report the results of analysis for the target parameters only. While we recognize the Agency's concern regarding potential interferences and overlap with use of inductively coupled plasma-atomic emission spectroscopy (ICP), we believe reporting of all chemicals listed in the Quantitation Limits Table is unnecessary. The analytical method itself states a number of ways in which spectral overlap can be compensated. These methods will be followed in the event an interference is encountered. In addition, all analyses will follow the procedures outlined in the Quality Assurance Plan to ensure data accuracy.

The Agency's requirement to add barium and zinc to the target parameters is objectionable. As stated above, the target parameters were selected based upon historical information regarding types of waste managed by the SWMUs. There is no information that barium or zinc were ever managed in any of the SWMUs. Accordingly, it is unnecessary to sample for them at any of the SWMUs.

Further, the permit does not include barium or zinc as a hazardous constituent. 35 Illinois Administrative Code Section 724.193(b) allows the Agency to exclude constituents from the list of hazardous constituents specified in the permit if it finds that the constituent is not capable of posing a substantial present or potential hazard to human health or the environment. In issuing the permit without including barium or zinc as hazardous constituents, the Agency made the determination that these constituents do not pose a threat to human health or the environment. Accordingly, there is no need to sample for either barium or zinc since the Agency has already determined that they do not pose a threat.

Condition 5

Although field screening for VOCs is used widely in the environmental industry as a precaution for facilities that have managed VOCs, VOCs have never been identified as a constituent of concern at this facility. Accordingly, the requirement to field screen for VOCs at all locations is unnecessary.

Condition 11

Soil samples from the deeper interval will be collected above the water table. As part of the Phase 1 activities, soil samples will be collected from three locations as set forth in the Workplan. The objective of this sampling effort is to gain an initial indication of whether releases of hazardous waste have occurred to surface and subsurface soils adjacent to SWMU 1. Additional soil sampling/analysis will be performed in Phase II to verify that there has been no release from the unit.

Condition 12

The Workplan specifies that surface samples will be collected from three locations to be field determined when the investigation is conducted. One of these samples can be taken from a location along the low lying area where drainage would tend to take place.

Condition 13

Soil samples from the deeper interval will be collected above the water table. As part of the Phase 1 activities soil samples will be collected from three locations as set forth in the Workplan. The objective of this sampling effort is to gain an initial indication of whether releases of hazardous waste have occurred to surface and subsurface soils adjacent to SWMU 12. Additional soil sampling/analysis will be performed in Phase II to verify that there has been no release from the unit.

No attempt will be made to collect soil samples beneath the tank. Instead, a location for the installation of a groundwater monitoring well close to SWMU 12 will be proposed in the Phase II workplan.

Condition 15

A one-time sampling event of the surface water in SWMU #13 is planned following a significant rain event. Samples will be collected a few days after the rainfall, if possible. During Phase I efforts, the samples will be taken from the four station points for surface water and sediment sampling proposed in the workplan.

Additional sampling activities, if needed, to demonstrate that no remediation will be necessary at SWMU #13, will be carried out as part of Phase II activities.

Sediment samples to be collected from all stations, except for Station 1, will be collected (1) towards the middle half of the creek located closest to the Gilbert & Bennett Manufacturing Company's property and (2) where visual contamination appears to be located.

The sediment samples will be collected from the 0.5-1.0 foot interval of the remaining sediments for lab analyses and the interval from 0-6 inches will be field screened visually and by use of a device that detects VOCs (i.e., PID). Should visual contamination be observed or contamination be detected by the use of a device such as PID, then the observations/measurements from such an interval will be recorded within the required RFI reports. Sediment samples collected at each station from the interval of 0.5-1.0 foot will be

analyzed by the lab for metals (see condition 4 above). The results of these investigations will be reported in accordance with the Conditions of the Agency's approval letter.

Condition 16

Nine samples will be collected as set forth in the submitted Workplan. The goal of this initial sampling is to gain an initial indication of the level and type of contamination that may be present. The results of the initial sampling will be reported within the Phase I Report. The Phase II workplan will contain additional sampling locations that will be needed to demonstrate that no soil remediation is necessary.

Condition 19

This condition is objectionable in that it appears to expand the scope of the RFI beyond what was intended. The purpose of Condition 4 is to set forth the methods of analysis for metals as well as VOCs. Pursuant to Condition 4, if a sample is to be analyzed in the lab for either metals or VOCs, the method specified in Condition 4 must be used. However, Condition 19 seems to require that all samples collected for analysis must be analyzed for both metals and VOCs (the constituents referred to in Condition 4). The proposed sampling and analysis plan was based upon historical information regarding the type of waste managed at each SWMU. Because VOCs were not managed at every SWMU, lab analysis of every sample for VOCs was not included in the plan.

Condition 21 and Condition 24

Gilbert & Bennett's interpretation of the permit is that semiannual sampling would not begin until 1997. Gilbert & Bennett has performed sampling of R05S for the G1 permit parameters and quarterly sampling on well G01S to establish background concentration for zinc. The first groundwater sampling event for 1997 is scheduled for April. During this April 1997 event, Gilbert & Bennett will sample for all G1 permit parameters as well as perform the Appendix I scan. In addition RFI groundwater investigation activities, proposed in Section 4.3 of the Sampling and Analysis Plan, will be implemented.

Condition 23

The purpose of the groundwater investigation is to determine whether constituents of waste determined to have been placed or released from the SWMUs have entered groundwater. With this purpose in mind, incorporation of the entire 620.410 list is unnecessary.

ENSR

If you have any questions regarding this matter, please contact me at (630) 887-1700.

Sincerely,

Mark S. McGlathery
Program Manager

Reference No. 97-02-B084

B-149-CA-1

cc: Maywood
USEPA

JKM
MGS

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October 2, 1996

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OCT 07 1996
IEPA-BOL
PERMIT SECTION

Mr. Edwin C. Bakowski, P.E., Manager
Permit Section
Bureau of Land
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62794-9276

SUBJECT: Gilbert & Bennett Manufacturing Company's Comments to the Illinois Environmental Protection Agency's Conditional Approval of the RCRA Facility Investigation Phase I Workplan for Gilbert & Bennett's Blue Island, Illinois Facility

Dear Mr. Bakowski:

In response to your Agency's draft conditional approval of the above referenced workplan received August 30, 1996, Gilbert & Bennett Manufacturing Company submits the following comments.

IEPA Condition

7. Gilbert & Bennett Manufacturing Company must demonstrate to the Agency conclusively in the Phase I RFI report that a potential does not exist for waste to migrate to underlying soil; otherwise a soil sampling and analysis plan will be required within the Phase I report or Phase II RFI Workplan for SWMU #5.

Comment

Gilbert & Bennett objects to the standard articulated in Comment 7, which requires Gilbert & Bennett to "demonstrate....conclusively...that a potential does not exist for waste to migrate to soil." The standard articulated by the Agency is objectionable for at least two reasons. First, Gilbert & Bennett questions whether one can ever demonstrate "conclusively" that a condition or fact does not exist. In the context of demonstrating the absence of migration, such a standard implies or would seem to imply that Gilbert & Bennett must conduct soil sampling below the floors of the units to be inspected, regardless of the results of the integrity inspection.

Second, and more important, the standard articulated in Comment 7 is objectionable because it appears to modify the terms of and the standard contained in the facility's permit. The permit provides that soil sampling will be required "[i]f joints, cracks or other defects are found in the base of any

SWMU...which would potentially allow [migration]." Attachment A, § III.E. Gilbert & Bennett intends to follow the procedures and be guided by the standards outlined in the permit.

IEPA Condition

8. Prior to inspection, the concrete/asphalt surfaces of SWMU#s 5, 10, and 19 are to be steam cleaned and triple rinsed.

Comment

Gilbert & Bennett disagrees with IEPA's requirement that surfaces be triple rinsed prior to inspection. Steam cleaning will be sufficient to clean surfaces in order to conduct structural integrity inspections of these SWMUs. Triple rinsing is usually performed prior to formal closure of hazardous waste storage facilities. Gilbert & Bennett believes triple rinsing will generate an inordinate amount of waste water which would have to be managed by the facility.

IEPA Condition

10. The subject submittal apparently did not outline or provide a description of how the source of contaminated material at SWMU #1 and its vertical migration would be evaluated (i.e., investigated, stabilized, treated, removed, monitored, etc.). Also, there was no mention of developing an engineering cap for SWMU #1. Gilbert & Bennett Manufacturing must address these concerns within the Phase I report and will be required to submit additional plans within the Phase II RFI Workplan to further address these issues.

Comment

According to IEPA's RCRA Facility Assessment, the most likely scenario for SWMU #1 is overflow of waste sludge from the impoundment and leaching of hazardous constituents into the adjacent soils. Accordingly, the workplan did not seek to address vertical migration.

In addition, a discussion regarding stabilization, treatment, or removal of wastes from SWMU #1 would be premature in the workplan because there is no evidence of a release. Also, an engineered cap was previously rejected by IEPA, thus the workplan did not address this issue.

IEPA Condition

11. To demonstrate that there have been no releases from SWMU #7, soil samples must be collected from one additional sample location further south of the proposed sample locations toward the edge of the unit along a low lying area where drainage would tend to take place. At this additional location, a boring must be made to a depth of at least 6 feet and soil samples must be inspected for discolored soils and field screened for VOCs.

All soil samples collected from SWMU #7 to be analyzed at a lab must be analyzed for the metals listed in Condition 4.

Should any of the samples from the additional sample location be detected for VOCs during field screening, then a duplicate sample or the next deeper sample in the same interval should be analyzed by a lab for VOCs by Method 8240 of SW-846 and also for the metals listed in Condition 4.

Should any of the samples from the additional sample location appear to be visually contaminated, then the sample must be noted in the RFI Phase I Report as such and analyzed by a lab for VOCs by Method 8240 of SW-846 and also for the metals listed in Condition 4.

As possible, the placement of the three proposed sample locations should be from soils that are discolored as shown in the photographs within the RCRA Facility Assessment Report previously developed by the Agency.

Comment

This condition requires field screening as well as potential analysis of samples for VOCs. This requirement has been imposed at other SWMUs as well.

Gilbert & Bennett questions the need to field screen soil samples for VOCs in areas there is no history of the use of VOCs. Only SWMUs 10 and 19 have been identified as historically using VOCs (trichlorethylene). Gilbert & Bennett does not question the necessity to analyze for VOCs in these areas if sampling is necessary based on the results of the structural integrity inspections. However, in areas where VOCs were not used, field screening and analysis for VOCs is not necessary.

In addition, VOCs have never been identified as a constituent of concern at the facility until issuance of the permit which requires groundwater sampling for 1-1-1-trichloroethane for a minimum of 2 quarters. This condition was placed in the permit due to its presence in one sampling event during 1991 where it was found in both groundwater samples and the field blanks. VOCs have not been detected in groundwater samples since this one event.

IEPA Condition

14. The subject submittal proposed a one-time sampling event of the surface water in SWMU #13 following a significant rain event. If Gilbert & Bennett wants to initially perform a one-time surface water sampling event, the sampling must be performed in a period of time when little rain has occurred so that normal levels of the constituents present can be assessed and sources determined. A large rainfall would introduce a significant volume of water from non point sources that are not of concern. This would also introduce a larger dilution of the contaminant than normally experienced. Gilbert & Bennett must notify and discuss with Gregg Sanders of my staff the past rainfall conditions, creek level, etc., prior to performing a surface water sampling event to be conducted prior to a significant rainfall as discussed above.

Gilbert & Bennett may follow the surface water sampling required to occur prior to a significant rainfall, with a water sampling event that follows a significant rainfall. If this is done, Gilbert & Bennett should collect samples in 10-15 minute intervals during/after the rainfall in an attempt to capture a peak level of contaminant flow.

The subject submittal proposed four station points for surface water and sediment sampling. The locations for these stations are hereby approved for an initial investigation of the surface water and sediments to be reported when the RFI Phase I Report.

To demonstrate that no remediation will be necessary at SWMU #13, an additional three stations must be established from which surface water and sediment samples will be analyzed in the lab. The results of all the samples should properly access the water and sediments of the creek for which the length is estimated to be approximately 900 feet long. The locations of the additional stations from which the sediments and surface water will be analyzed by the lab should be located in the following manner:

- 100 upstream/northwest of Station 2;
- between Station 2 and 3; and
- approximately 100 to 200 feet downstream from Station 4.

The sampling efforts at the additional stations listed above may be carried out as part of the Phase II activities.

Sediment samples to be collected from all stations, except for Station 1, must be collected (1) towards the middle half of the creek located closest to the Gilbert & Bennett Manufacturing Company's property and (2) where visual contamination appears to be located.

Gilbert & Bennett proposed Station 1 to obtain representative background samples from a water/sediment inlet entering Mosquito Creek SWMU #13 from an off-site location. The Agency will evaluate the data collected and submitted, and consider potential source migration to the creek from other sources other than Gilbert & Bennett.

The subject submittal proposed the use of nitric acid as a preservative for the surface water samples to be analyzed for metals at SWMU #13. This proposal is hereby approved. Note however that surface water samples must also be initially analyzed for VOCs and the samples collected for this must not contain this additive.

The subject submittal proposed to collect sediment samples from a 0-6 inch interval for lab analysis. Because the facility has been operating for over 175 years and some sediments were removed from SWMU #13 in 1993 as a result of a release from the Gilbert & Bennett Manufacturing Company as indicated in the subject submittal, the sediment samples should be collected from the 0.5-1.0 foot interval of the remaining sediments for lab analyses and the interval from 0-6 inches should be field screened visually and by use of a device that detects VOCs (i.e., PID). Should visual contamination be observed or contamination be detected by the use of a device such as PID, then the observations/measurements from such an interval must be recorded within the required RFI reports. Sediment samples collected at each station from the interval of 0.5-1.0 foot must be analyzed by the lab for the metals and VOCs referred to in Condition 4. (Note that it may be helpful to analyze the 0-6 inch interval also at Station 1 since the sediments at this location may or may not have been disturbed by the 1992 sediment removal effort.) The results of these investigations must be reported in accordance with the Conditions of this letter.

Comment

Gilbert & Bennett proposed sampling after a significant rainfall in order to ensure there was enough water in the creek to sample. The creek has intermittent flow, and at certain times of year there is no flow. It was not Gilbert & Bennett's intention to dilute samples. In addition, Gilbert & Bennett does not see the necessity to sample 100 to 200 feet downstream from proposed sampling station 4. If results of the proposed Phase I sampling demonstrate the need to sample off-site, this sampling will be performed during Phase II of the RFI.

IEPA Condition

20. In accordance with Condition II.E.b of the RCRA post-closure permit issued for this facility, only the annual Appendix I sampling event has been delayed until the first sampling event of 1997, which in accordance with Permit Section I.2 is to occur during the months of April-May with sampling results due to the Agency by July 15, 1997. The semi-annual sampling and analysis of the facilities five wells was to begin with the first sampling event immediately following the effective date of the Permit (see Permit Section II.E.2.e). This schedule shall be maintained unless a corrective action plan is approved by the Agency prior to the above date.

Comment

During negotiation of this permit with the IEPA, it was agreed that semiannual sampling would not begin until 1997 so the facility could establish background groundwater quality. Permit condition II.E.1.B confirms this interpretation.

IEPA Condition

21. The Agency can see no reason to delay the RFI Groundwater Investigation Activities, therefore, the Permittee shall implement the groundwater activities proposed in Section 4.3 of the Project Management Plan Section and in the sampling and Analysis Plan Section of the RFI Workplan, within 45 days of the date of this conditional approval letter.

Comment

The delay of RFI Groundwater Investigation Activities is proposed in order to coincide with the semi-annual sampling required by the permit.

IEPA Condition

22. All groundwater samples shall be analyzed for the constituents listed in Table 5-1, page 5-5 of the Sampling and Analysis Plan section of the RFI Workplan, as well as the 35 IAC Part 620.410 parameter list for the initial sampling event. The permittee may propose to reduce the Part 620 constituent list for the initial sampling event, provided that none of the 620.410 parameters are detected in the groundwater sample.

Comment

Gilbert & Bennett objects to the incorporation of the entire Part 629.410 parameter list into the groundwater investigation. Under the terms of the permit, the sampling plan, including the list of constituents for analysis, was to be proposed by the facility, along with a basis for the proposal. Attachment A,¶ III.G.4(a) & (b). Both the introduction to §III.G. of Attachment A and paragraph III.G.4(a) indicate that the purpose of the groundwater investigation is to determine whether constituents of waste determined to have been placed in or released from the SWMUs have entered groundwater. Given that purpose, the incorporation of the entire Part 620.410 list is unnecessary. Furthermore, the Agency's comment is surprising because the issue pertaining to the constituents to be sampled for in the groundwater at the facility was extensively discussed by Gilbert & Bennett's representatives and Agency management during the negotiations of the permit. IEPA agreed to the sampling program set forth in Section II of the permit, including the list of parameters for analysis. The list of parameters was composed of those parameters that have been detected in groundwater during nearly 10 years of groundwater monitoring at the facility.

IEPA Condition

A quarterly report of the work completed from the date of this letter to September 30, 1996 (the first quarter of the current calendar year during which the required Phase I investigation is taking place) must be submitted to the Agency by November 1, 1996. Subsequent quarterly reports must be submitted in a similar manner until the final Phase I RFI Report is submitted to the Agency.

ENSR

Comment

The workplan sets forth a schedule in which work will be completed in 180 days. Given this schedule, Gilbert & Bennett does not see the necessity for quarterly reporting.

If you have any questions regarding this matter, please give me a call.

Sincerely,

For Joseph Kenny

Mark S. McGlathery
Program Manager

MSM/bjk

Reference No. 96-10-B380