Message

Sent: 9/6/2018 12:21:03 PM
To: Tsai, Shu-Mei [Shu-Mei.Tsai@Illinois.gov]; jack@autumnwoodesh.com
CC: Gerald Ruopp [gruopp@centralwire.com]
Subject: RE: [External] FW: Comments from the Sierra Club
Attachments: 3008 h order Techalloy 2-3-93.pdf; 3008h Order Techalloy 9-30-1999.pdf; 3008 h Order Mod Techalloy 1-3-2003.pdf; Table 2-1 - 2016 Plume Investigation Dlata.xlsx; Table 2-2 - 2016 Geoprobe Sampling Locations - 11-9-2016.xlsx; Table 2-3 -2016 RCRA CMI Field Investn GW Stabilizan Data - 11-9-2016.xlsx; Table 2-4 - 2016 GP Plots- MCL excedances - 12-1-2016.xlsx; Table 3 -1 - 6-2016 RCRA MW Data - 11-9-2016.xlsx; Table 3-2 - Crosswalk of addresses to occupants - 12-30-2016.docx; Table 3-3 - 6-2016 monitoring & Res Well Stabn Data.xls; Table 3-4 - DGW-1S - 12-2016.xlsx; Table 3-5 - 6-2016 Extraction Well Data.xlsx; Central Wire 2016 RCRA CMI Field Investigation Summary Report rev 1 - 3-23-2017 .pdf; Certification_2016 RCRA Corrective Measures Field Investigation Report_Rev 1_3-23-17.pdf; Figure 2-1 - 2016 Geoprobe Locations.jpg; Figure 3-1 - MW-2 - 12-2016.xlsx; Figure 3-2 - MW-4 - 12-2016.xlsx; Figure 3-3 - MW-5 (wo 95)- 12-2016.xlsx; Figure 3-4 - MW-5D - 123-2016.xlsx; Figure 3-5 - MW-6 - 12-2016.xlsx; Figure 3-6 - MW-7 - 12-2016.xlsx; Figure 3-7 - MW-8 - 12-2016.xlsx; Figure 3-8 - MW-9 - 12-2016.xlsx; Figure 3-9 - MW- HBR - 12-2016.xlsx; Figure 3-10 - DGW-1I - 12-2016.xlsx; Figure 3-11 - DGW-1D -12-2016.xlsx

Ms. Tsai,

Per our conversation on September 5, 2018, I have attached the Orders on Consent for the Techalloy Facility, that you requested. I have also attached the 2016 RCRA CMI Study report. Please contact me if you have any questions.

From: Tsai, Shu-Mei [mailto:Shu-Mei.Tsai@Illinois.gov]
Sent: Wednesday, September 05, 2018 10:12 AM
To: jack@autumnwoodesh.com
Cc: Nordine, John <nordine.john@epa.gov>; Gerald Ruopp <gruopp@centralwire.com>
Subject: RE: [External] FW: Comments from the Sierra Club

Good morning, gentlemen:

For Comment # 4, do you have any response letter from USEPA or IEPA?

Shu-Mei

From: jack@autumnwoodesh.com [mailto:jack@autumnwoodesh.com]
Sent: Thursday, August 16, 2018 2:59 PM
To: Tsai, Shu-Mei <Shu-Mei.Tsai@Illinois.gov>
Cc: John Nordine <nordine.john@epa.gov>; Gerald Ruopp <gruopp@centralwire.com>
Subject: [External] FW: Comments from the Sierra Club

Shu-Mei:

I have responded to the comments within the text, below.

Please call me if you have any questions or concerns.

Regards,

Jack

John W. Thorsen, P.E.

Autumnwood ESH Consultants, LLC
262.237.1130

From: Tsai, Shu-Mei <Shu-Mei.Tsai@Illinois.gov>
Sent: Wednesday, August 15, 2018 10:48 AM
To: jack@autumnwoodesh.com; Gerald Ruopp <gruopp@centralwire.com>; Robert Johnson <rjohnson@centralwire.com>
Subject: Comments from the Sierra Club

Gentlemen:

I received the several comments from the Sierra Club. Please provide the answer for following questions. Thank you

1. Has the facility developed and submitted its Storm Water Control Program to IEPA?

Central Wire (CWI) has developed and submitted a Storm Water Pollution Prevention Plan in 2001. All storm water on the approximately 5 acre plant site drains internally to two seepage ponds that also receive non contact cooling waters and have been permitted by the IEPA.

2. What treatment technology is proposed for the discharges from the new Outfall 002? Is it the same air stripping system that is used at Outfall 001? If so, then why should the limits not remain the same as they are for Outfall 001 in the current permit?

Outfall 002 is at the leading edge of the chlorinated plume and has been tested for Volatile Organic Compounds and only has degradation products, i.e., 1,1-Dichloroethene at around the EPA Maximum Contaminant Limit (groundwater standard) of 7 μg/L. IEPA allows a discharge of up to 110 μg/L to surface waters (http://www.epa.illinois.gov/topics/water-quality/standards/derived-criteria/index). CWI has proposed and is being permitted for a direct discharge of the extracted groundwater and will be required to sample the discharged water monthly to confirm that CWI is not exceeding the NPDES effluent limitations.

3. How might greater discharges of these pollutants impact the South Branch of the Kishwaukee River, where aquatic life and aesthetic quality uses are now fully supported?

CWI does not expect that this additional discharge of relatively clean groundwater will adversely impact the aquatic life or aesthetic quality of the South Branch of the Kishwaukee River.

4. What analysis has been performed under RCRA to determine that the additional loading of these pollutants into the South Branch of the Kishwaukee River will not pose a risk to public health and welfare?

CWI has been conducting field investigations on almost an annual basis to determine the leading edge of the chlorinated plume under an Order on Consent with U.S. EPA since 2007. In 2016, EPA requested CWI propose solutions to manage the leading edge of the chlorinated plume so it would not impact the Ex. 6 Personal Privacy (PP) well and accepted the option to pump and discharge water to the South Branch of the Kishwaukee River. IEPA accepted that concept and is in the process of issuing a NPDES permit.

Shu-Mei Tsai,
Environmental Protection Engineer, Industrial Unit
Permit Section
Division of Water Pollution Control
Illinois Environmental Protection Agency

ph: 217-782-0610
fax: 217-782-9891
Shu-Mei.Tsai@Illinois.gov

State of Illinois - CONFIDENTIALITY NOTICE: The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.