



**TETRA TECH EM INC.**

May 16, 2011

Mr. Dennis G. Walsh  
15010 S. Ravinia Avenue  
Suite 10  
Orland Park, IL 60462-5353

**RE:                Leaking Underground Storage Tank (LUST) Incident No. 20031336  
                     9850 West 143<sup>rd</sup> Street, Davidson and Company Property  
                     Orland Park, IL, Cook County, Illinois**

Dear Mr. Walsh:

Tetra Tech EM Inc. (Tetra Tech) is pleased to present this scope of work and cost estimate to conduct site closure activities for the above referenced LUST Incident at the T.H. Davidson and Company property. This proposal provides a brief overview of the history and current status of the site, a recommended approach for completing closure, and a cost estimate to conduct these activities.

## **SITE HISTORY AND CURRENT STATUS**

Tetra Tech has reviewed available documents concerning the LUST Incident, including:

- Illinois Environmental Protection Agency (IEPA) 2003a. Letter dated Sept 15; LUST notification letter.
- IEPA, 2003b. Letter dated November 7; approval of 45-day report.
- IEPA, 2004a. Letter dated January 28; approval of Early Action Remediation budget.
- IEPA 2004b. Letter dated May 12; approval of Site Investigation Work Plan and budget.
- IEPA, 2005. Letter dated May 2; approval of February 14, 2005 Corrective Action Plan.
- IEPA, 2006a. Letter dated June 1; comments on the June 6 SECI Amended Corrective Action Work Plan, Budget, and Completion Report.
- IEPA, 2006b. Letter dated June 1; approval of budget for June 6 SECI Amended Corrective Action Work Plan, Budget, and Completion Report.
- IEPA, 2006c. Letter dated September 22; partial approval of the August 2, 2006 SECI revised Corrective Action Plan and Budget.
- Schrack Environmental Consulting Inc. (SECI), 2003a; Letter dated September 22, 20-day Report.
- SECI, 2003b. Letter and report dated October 23; 45-day Report.
- SECI, 2003c. Letter dated December 29; Early Remedial Action Documentation, including eligibility determination letter from the Office of the State Fire Marshall (OSFM), and Budget Billing Forms.
- SECI, 2004a. Letter and report dated February 5; Site investigation Work Plan and Budget.
- SECI, 2004b. Letter and report dated June 23; Site Investigation Completion Report.
- SECI, 2004c. Draft Corrective Action Plan dated October 21.

- SECI, 2004d. Letter and report dated November 2. Corrective Action Plan.
- SECI, 2006a. Letter and report dated April 6. Amended Corrective Action Work Plan, Budget, and Completion Report.
- SECI, 2006b. Letter and report dated August 2. Revised Corrective Action Work Plan and Budget.
- SECI, 2006c. Letter dated October 9; re; Pioneer Environmental sample results from gasoline underground storage tank (UST) excavation area.

The information reviewed above is assumed to be complete and current. Reports and letters prepared by SECI document the activities undertaken to investigate soil and groundwater conditions near a former 5,000 gallon gasoline UST and a former 10,000 gallon diesel UST. These excavations were located in different areas of the site and included iterative excavation and sampling activities from 2003 to 2006. The most recent closure documentation provided by SECI in April 2006 (SECI, 2006a) documents the approved removal and remediation activities that have been conducted to date. This included the removal and offsite disposal of 60 tons of soil from the former diesel UST excavation and the removal of about 2,461 tons of soil from the former gasoline UST excavation. In addition, contaminated water was removed from the gasoline UST excavation. The results of SECI sampling at that time identified that soil met remediation objectives in the gasoline and diesel UST excavations. However, IEPA commented on an exceedance of the remediation objective in the diesel excavation area. In addition, Pioneer Environmental (Pioneer) conducted sampling activities in both the UST areas (and elsewhere on the property) that identified contamination above remediation objectives, including the base of the gasoline UST area.

SECI submitted a revised corrective action report in August 2006 (SECI, 2006b) that included proposed excavation in both the diesel and gasoline UST areas to address the IEPA comment on the diesel excavation and the Pioneer sample result for the gasoline UST. The IEPA approved further remediation activities for the diesel excavation, but denied further excavation in the gasoline UST area. The IEPA denial required SECI to document that their confirmation samples were inaccurate before they would reimburse remediation to address the Pioneer exceedance.

Tetra Tech discussed the site status with the IEPA project manager on, Ms. Melinda Friedel on May 6, 2011. Ms. Friedel indicated that the OSFM would have to make an eligibility determination to allow for the Village of Orland Park (Village) to obtain reimbursement for any remediation activity, should the Village wish to complete the approved corrective action. However, Ms. Friedel stated that there had been revisions to the LUST program requirements since 2006 and that implementation of the approved Corrective Action Plan would be “at risk”, as the required remediation would only have to meet Industrial/Commercial remediation objectives. Thus, the IEPA may disallow most, if not all, of the cost reimbursement.

## **DISCUSSION**

Tetra Tech reviewed the available data related to the diesel and gasoline UST excavations.

The Pioneer data for the gasoline UST excavation identifies an elevated benzene concentration (17 mg/kg) at the base of the excavation at a depth of 9 to 11 feet. The sample location is in the base of the former UST excavation. The IEPA has stated that they will not approve remediation to address this contamination, as they have already approved the remediation based on SECI’s confirmation sample results.

The SECI corrective action plan for addressing residual contamination in the diesel UST excavation was based on remediation of contamination in one wall sample [D-4(W)-5’]. This sample exhibited an exceedance of the Tiered Approach to Corrective Action Objectives (TACO) Tier 1 remediation objectives for the residential ingestion exposure pathway for benzo(a)pyrene and dibenzo(a,h)anthracene. However, TACO allows for

consideration of urban background concentrations for these compounds to meet the TACO Tier I remediation objective. When the results are compared against the metropolitan statistical average (MSA) background criteria (the background Tier 1 TACO residential RO), it is apparent that the results meet TACO Tier I residential criteria. Thus, no additional remediation activity is necessary to meet the RO for the diesel UST excavation and the IEPA LUST program has already denied additional remediation activity for the gasoline UST excavation.

Tetra Tech believes that the following activities should be considered to close out the LUST incident number: (1) obtain an eligibility determination from the OSFM; (2) submit required paperwork to allow the Village to act as the owner/operator for the UST systems; and (3) submit a revised corrective action completion report that requires no further remediation activity.

Tetra Tech notes, however, that there may be residual contamination present associated with other past operations at the Davidson site, as identified by the Pioneer sampling activities in 2006; this information was provided to the IEPA with the August 2006 revised corrective action plan and budget (SECI, 2006c). This scope of work is not intended to investigate or address past operations unrelated to the LUST incident.

## **SCOPE OF WORK**

### **Task 1 – Obtain Eligibility Determination from OSFM**

Tetra Tech will work with the Village to obtain an eligibility determination from the OSFM for the former UST systems. Tetra Tech will prepare and submit required paperwork.

Cost estimate -- \$500.00.

### **Task 2 – Submit Required Forms to LUST Program**

Tetra Tech will work with the Village to submit the revised USTowner/operator forms to the IEPA. Tetra Tech will prepare and submit required paperwork.

Cost estimate -- \$500.00

### **Task 3 – Submit Revised Corrective Action Completion Report.**

Tetra Tech will submit a revised Corrective Action Completion Report to the IEPA that calls for no further remediation activities to close out the LUST Incident.

Cost estimate -- \$6,000.00

The total cost estimate to complete these activities is \$7,000.00

Acceptance of this proposal can be initiated by signing and returning the enclosed "Tetra Tech EM Inc. Professional Services Agreement." Tetra Tech will not begin work prior to receiving your written authorization. Tetra Tech believes that the work can be completed with 45 days of authorization to proceed.

If you have any questions regarding this proposal, please contact me at 312-201-7474.

We appreciate the opportunity to provide this proposal and look forward to working with you on this project. Do not hesitate to call me to discuss this proposal.

Sincerely,

Mr. Walsh  
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**TETRA TECH EM, INC.**

A handwritten signature in black ink, appearing to read 'Tom Hahne', with a long, sweeping underline that extends to the right.

Tom Hahne  
Project Manager

