



August 1, 2013

Mr. Todd Gross
Bureau of Land
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

Re: 1970905180-DuPage County
Romeoville Spartans' Square Shopping Center
Amendment 1 to Supplemental CSI/ROR/RAP

Dear Mr. Gross:

V3 Companies (V3) has prepared this amendment to the June 2013 Supplemental Comprehensive Site Investigation (CSI) / Remediation Objectives Report (ROR) / Remedial Action Plan (RAP). The purpose of the amendment is to clarify certain report items.

Remediation goals / objectives:

- Perform soil remediation (in-situ chemical oxidation via soil mixing) at and in the vicinity of soils with elevated VOC concentrations, to meet RCRA Alternative Land Disposal Restriction (LDR) Treatment Standards for Contaminated Soil (35 IAC Part 728.149 and 40 FDR Part 268.49), and to remove the need for additional pre-treatment of in-situ soils prior to potential future soil removals and disposal at a landfill. Specifically, the following LDRs will be used as the remediation objectives (ROs) for the primary contaminant of concern (COC) and related degradation products:
 - Tetrachloroethylene (PCE): 60 mg/kg
 - Trichloroethylene (TCE): 60 mg/kg
 - 1,1,1-trichloroethane or 1,1,2-trichloroethane (TCA): 60 mg/kg each
 - Trans-1,2-dichloroethane (DCE): 300 mg/kg
 - Vinyl chloride (VC): 60 mg/kg

With the exception of PCE, the other COCs are currently below LDRs. However, the additional LDRs are provided for reference, if needed. *Note: Based on laboratory analytical results, the site soil concentrations for TCA, DCE and VC are 'non-detect' and one sample had a TCE concentration that exceeds the Tier 1 soil migration to groundwater RO.*

- Following the in-situ soil treatment, any remaining TACO risks in excess of Tier 1 industrial-commercial ROs will be addressed using engineering and institutional controls.

Groundwater Ordinance: The Agency no longer needs to review the site-specific groundwater ordinance that was submitted with the Supplemental CSI/ROR/RAP. Instead, the existing IEPA-approved limited groundwater use ordinance will be used, since it covers both on-site and potential off-site (modeled) groundwater impacts.

Soil Gas Laboratory Analyses: Soil gas samples were analyzed using the TO-15 standard, for only VOCs because these are the target COCs. Since SVOCs and mercury are not site COCs, V3 did not include them in the analytical program, and so did not run the full list of compounds in Part 742 Appendix B, Table H.

Remediation Schedule: Soil remediation activities are anticipated to begin in about two months. However, before any field work can commence, the USEPA Brownfields Grant Manager must also provide authorization to begin, which is in part dependent on IEPA's written approval of the RAP.

We will notify you at least two weeks in advance of the start of field work. Thank you for your consideration and assistance in these matters. Please contact me at 630.729.6562 with any questions.

Sincerely,
V3 COMPANIES



Rachael K. Berthiaume, P.E., LEED AP
Project Engineer

RKB/CAM

cc: Lawrence Eastep, P.E., Andrews Engineering
Dawn Caldwell, Village of Romeoville
Jan Pels, USEPA (via email)