



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

BRUCE RAUNER, GOVERNOR

LISA BONNETT, DIRECTOR

Bureau

217/524-3300

March 21, 2016

John Albritton
Honeywell International, Inc.
2768 N. U.S. 45 Road
P.O. Box 430
Metropolis, Illinois 62960

Re: 1278540002 -- Massac County
Honeywell International, Inc.
ILD006278170
Log No. B-65R2-CA-4
Received: October 14, 2014 and June 16, 2015
RCRA Permit
Permit CA

Dear Mr. Pritchett,

This is in response to the following two documents you submitted on behalf of the Honeywell International Metropolis Works Facility (Honeywell), Metropolis, Illinois:

Submittal No. 1 – A document entitled, "Draft Environmental Land Use Control", dated October 10, 2014 and received by the Illinois EPA on October 14, 2014. The subject document provides a proposed Environmental Land Use Control (ELUC) to complete closure activities pursuant to 35 Ill. Adm. Code Part 742 (TACO) for groundwater contamination associated with Violation Notice (VN) No. L-2001-01382.

Submittal No. 2 – A document dated June 16, 2015 and received by the Illinois EPA on June 18, 2015. Submittal No. 2 was submitted in response to a December 2, 2014 e-mail from the Illinois EPA to Mr. Sean Chisek of Honeywell. It is addressed herein as additional information to Submittal No. 1 referenced above.

The subject documents were submitted to address the requirements of Condition 1 of the August 11, 2014 Illinois EPA letter (Log No. B-65R2-CA-3). These documents were reviewed as a request to modify the Corrective Action portion of the facility's RCRA Part B Permit (Permit) dated October 29, 2013 and last revised on February 22, 2016 (Log No. B-65R-M-22). The Permit among other things requires the facility to conduct corrective action as necessary on solid waste management units at the facility.

Upon review, the Illinois EPA has determined that the subject documents can be approved subject to the following conditions and modifications:

1. The proposed Environmental Land Use Control (ELUC) for the Honeywell International, Inc. Metropolis Works facility located at 2768 N. US 45 Road, Metropolis, Illinois in Massac County (PIN Nos. 05-33-200-001, 05-34-100-002, 05-34-100-997, 05-34-100-999, 05-35-300-039, 05-35-300-040, 08-02-100-999, 08-02-150-999) is hereby approved subject to the following conditions and modifications:
 - a. A survey plat of the property and legal description must be filed with the Office of the Recorder or Registrar of Titles of Massac County at the same time your approved draft ELUC is filed.
 - b. The final ELUC filed with the Office of the Recorder or Registrar of Titles for Massac County must include a dated and notarized signature of the property owner.
2. The ELUC approved herein places the following restrictions on the subject property:
 - a. Future use of the property shall be restricted to industrial/commercial use only.
 - b. All existing or potential buildings must have full concrete slab-on-grade construction or full concrete basement floor and walls.
 - c. Groundwater under the property shall not be used as a potable supply of water within the ELUC area.
3. Section Three of the draft ELUC must be revised to state:

Section Three. The Property Owner hereby agrees, for himself/herself, and his/her heirs, grantees successors, assigns transferees and any other owner, occupant, lessee, possessor or user of the Property or the holder of any portion thereof or interest therein, that:

- 1) The groundwater under the Property shall not be used as a potable supply of water within the ELUC area.
- 2) Any contaminated groundwater or soil that is removed, excavated, or disturbed from the Property described in Exhibit A herein must be handled in accordance with all applicable laws and regulations.
- 3) All existing or potential buildings on the Property described in Exhibit A herein must have full concrete slab on-grade or full concrete basement floor and walls. Defects found in any concrete slab on-grade or concrete basement floor/wall will be repaired in a timely manner.

- 4) The Property described in Exhibit A herein shall be used for Industrial/Commercial purposes.
4. This letter shall constitute the Illinois EPA's no further action determination instrument for the Chlorinated Solvent/Arsenic Area that must be filed with the ELUC approved herein, provided the terms and conditions of this letter are met.
5. After Honeywell has completed the inspection and repair of all process wastewater trenches and sumps at the subject facility, the ELUC approved herein must be fully executed, notarized and recorded in the chain of title for the subject property in the Office of the Recorder or Registrar of titles for Massac County. The approved ELUC will not become effective until recorded in the chain of title for the subject property.
6. Within 30 days after filing the approved ELUC in accordance with Condition 5 above, a certified true copy of the filed ELUC, along with certification for the Office of the Recorder or Registrar of Titles for Massac County that the ELUC was properly filed, must be submitted to the Illinois EPA. Once Illinois EPA receives this information and a final certification of closure and associated closure document report, it will be able to issue a final letter indicating the subject groundwater contamination has been properly closed in accordance with 35 Ill. Adm. Code 724.
7. Failure to comply with the limitations or requirements of an ELUC may result in voidance of an Illinois EPA no further action determination in accordance with the program under which the determination was made. The failure to comply with the limitations or requirements of an ELUC may also be grounds for an enforcement action pursuant to Title VIII of the Illinois Environmental Protection Act.
8. The limitations or requirements of the ELUC apply in perpetuity or until:
 - a. The Illinois EPA issues a new no further action determination approving modification or removal of the limitation/requirement; and
 - b. A release or modification of the land use limitation is filed on the chain of title for the property that is the subject of the ELUC.
9. At no time shall this site be used in a manner inconsistent with the land use limitations established in the approved ELUC, unless: (1) attainment of objectives appropriate for the new land use is achieved; and (2) a new no further action determination is obtained from Illinois EPA and subsequently recorded in accordance with 35 Ill. Adm. Code 742.
 - a. Requests to release or modify an ELUC must be formally requested in writing from Illinois EPA as a: (1) request to amend the certification of closure; or (2) a permit modification request. Sufficient information must be provided in these requests to demonstrate that the requested change meets all the requirements of 35 Ill. Adm. Code 742.

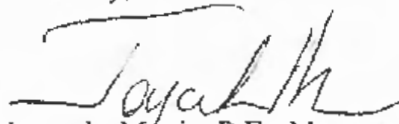
b. Any final approval by Illinois EPA of a request to release or modify an ELUC must be filed with the chain of title for the subject facility.

10. A completed RCRA Corrective Action Certification form must accompany all information submitted to the Illinois EPA regarding the RCRA Corrective Action Program being carried out at this facility. To aid in the proper review of submitted information, two copies must accompany the original of all submitted corrective action related information.

Work required by this letter, your submittal(s) 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 the groundwater aspects of this project, please contact Dana Austin at (217) 524-8964; questions regarding any other aspect of this project should be directed to Kelly Huser at (217) 524-3867.

Sincerely,



Joyce L. Manie, P.E., Manager
Permit Section
Division of Land Pollution Control
Bureau of Land

JLM/DMA:1278540002-RCRA-B65R2CA4-Approval

JLM

DMA-TBM

Bcc: Bureau File

Joyce Manie

Terri Blake Myers

Jim Moore

Kelly Huser

Bill Sinnott

Marion Region

Scott Kaufman

Dana Austin