



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

BRUCE RAUNER, GOVERNOR

ALEC MESSINA, DIRECTOR

217/524-3300

August 30, 2018

Certified Mail

7017 2680 0001 0213 7850

Jeff Fulks  
Honeywell Intl Inc  
2768 N. U.S. 45 Road  
P.O. Box 430  
Metropolis, Illinois 62960

Re: 1278540002 -- Massac County  
Honeywell International, Inc  
ILD006278170  
Permit No. B-65R2-CA-20  
RCRA Permit  
Permit CA

Dear Mr. Fulks:

This letter is in response to the submittal entitled, "Underground Sewers (AOC-1 and AOC-2) Groundwater Monitoring Review", dated July 12, 2018 and received by the Illinois EPA on July 17, 2018. The submittal includes the groundwater monitoring results and review for AOC-1 and AOC-2 Groundwater Monitoring Programs associated with the Underground Process Sewer Inspection and Maintenance Plan approved by the Illinois EPA (Log B-65R2-M-17) on October 13, 2015.

The Illinois EPA approved the AOC-1 investigation work plan on March 29, 2016 (Log B-65R2-CA-8) and the AOC-2 investigation work plan on April 18, 2016 (Log B-65R2-CA-11). Based on the results for the AOC-1 and AOC-2 Groundwater Monitoring Programs, the subject submittal proposes: (1) reduction of the sampling frequency for the Underground Sewer Monitoring Well Network; and (2) additional corrective action for AOC-1 and AOC-2 is not warranted.

The Illinois EPA has reviewed the information in your submittal as a modification to Honeywell's corrective action program and hereby approves this submittal as a modification to the approved RCRA corrective action program being carried out at the Honeywell facility in Metropolis, Illinois, subject to the following conditions and modifications:

1. If soil samples cannot be obtained for AOC-1, then an engineered barrier and associated institutional control must be established to restrict exposure to the soils at AOC-1. This barrier must meet the requirements of 35 Ill. Adm. Code 742, Subpart K.

A detailed description of any proposed engineered barrier must be submitted to Illinois EPA if a determination is made that soil samples cannot be collected at AOC-1. 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.

- a. If a determination is made to use an engineered barrier at AOC-1, then an institutional control must be developed in accordance with 35 Ill. Adm. Code 742, Subpart J and must also clearly include the following information and restrictions:
    - i. 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 remains over it and the restrictions set forth in the institutional control are met;
    - ii. A scaled drawing showing the boundaries of the required engineer barrier placed over the contaminated soil, relative to the property boundaries at the site;
    - iii. A description of the construction details for the required engineered barrier based over the contaminated soil;
    - iv. A requirement that the engineered barrier in place over the contaminated soil of concern properly be maintained in the future;
    - v. 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;
    - vi. A requirement that any soil removed from beneath the engineered barrier be managed in accordance with 35 Ill. Adm. Code, Subtitle G: Waste Disposal.
  - b. If necessary, the proposed institutional control described in Item 1 must be submitted to the Illinois EPA for approval within 60 days of this letter.
2. Due to the results of the eight quarters of sampling for the Underground Sewers Groundwater Monitoring Well Program, the Illinois EPA concurs with the Facility that no further remediation or corrective action is required for AOC-1 and AOC-2, pertaining to groundwater. As a result, the following conditions and modifications apply:

- a. The wells must be properly maintained as described in Condition III.D.8 for potential future use; or
- b. The facility must properly plug and abandon wells G1A4, G1A5, GB10, and G1B7 as described in Condition III.D.5 and the "Illinois EPA Monitor Well Plugging and Abandonment Procedures" provided in Attachment A to the Permit. Submit certification that plugging and abandonment of the wells was carried out in accordance with the approved procedures to the Illinois EPA at the address below within thirty (30) days of the date that the wells are plugged and abandoned. All information should be submitted to the appropriate State Agencies.

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

- c. Upgradient wells G101 and R110 must continue to be sampled quarterly as required by Permit Section III.J.2.
3. Based on completion of the groundwater investigation of the Underground Sewers at AOC-1 and AOC-2, Honeywell must submit a Class 1\* Permit Modification as described in Condition III.K of the Permit to request removal of Conditions V.G.2, V.G.3, and V.G.4 of the Permit.
4. Honeywell must submit an Illinois EPA RCRA Corrective Action Certification Form with any request to modify corrective action activities. To aid in the proper review of submitted information, two copies must accompany the original of all corrective action related information.
5. The facility remains subject to the monitoring and reporting requirements for the interim network as defined in previous Illinois EPA letters. RCRA corrective action activities carried out at the facility, including off-site activities as necessary, must meet the requirements of: (1) 35 Ill. Adm. Code 724.201; (2) the facility's Permit; and (3) Illinois EPA letters regarding such activities.

This letter shall constitute Illinois EPA's final decision on the subject submittal. The applicant may appeal this final decision to the Illinois Pollution Control Board pursuant to Section 40 of the Act by filing a petition for a hearing within 35 days after the date of issuance of the final decision. However, the 35-day period may be extended for a period of time not to exceed 90 days by written notice from the applicant and the Illinois EPA within the initial 35-day appeal period. If the owner or operator wishes to receive a 90-day extension, a written request that includes a statement of the date the final decision was received, along with a copy of this decision, must be sent to the Illinois EPA as soon as possible.

For information regarding the request for an extension, please contact:

Illinois Environmental Protection Agency  
Division of Legal Counsel  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, IL 62794-9276  
217/782 5544

For information regarding the filing of an appeal, please contact:

Illinois Pollution Control Board, Clerk  
James R. Thompson Center  
100 West Randolph, Suite 11-500  
Chicago, IL 60601  
312/814 3620

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 Engineering Practice Act of 1989, the Professional Land Surveyor 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.

If you have any questions regarding the groundwater related issues associated with this project please contact Adam Shade at 217/785-9633. If you have any questions regarding the other aspects of this project, please contact Kelly Huser at 217/524-3867.

Sincerely,



Theodore J. Dragovich, P.E., Manager  
Permit Section  
Division of Land Pollution Control  
Bureau of Land

<sup>AMS KPA WRW</sup>  
TJD:AMS:1278540002-RCRA-B65R2CA20-Approval.docx  
<sub>AMB WBS</sub>

Bcc: Bureau File  
Collinsville Region  
DLC - Melanie Jarvis  
Michael Summers  
Rob Watson, Kelly Huser  
Amy Butler