

Kimmel, Amanda

From: Long, Natalie <NLong@atg.state.il.us>
Sent: Monday, March 23, 2020 1:39 PM
To: 'Deborah Bone'; Edward Casmere
Cc: Armstrong, Andrew; Navarrete, Brian
Subject: Follow-up on GMZ, touching base before hearing

Deb, Ed -

We hope you are both doing well, despite the peculiar circumstances of the current moment.

We heard back from Illinois EPA regarding the GMZ submission, and wanted to follow-up to share the feedback that we received.

As previously noted by Illinois EPA, the State's strong preference is that Peoples provide a fate-and-transport model at the present time, which could then serve as the basis for an approval/disapproval of the GMZ.

In the alternative, however, and with the understanding that Peoples does not have sufficient information to provide a fate-and-transport model upfront, the Agency is willing to accept a compromise position wherein Peoples:

- i) installs relief wells in the four stratigraphic trap areas identified in their 3-D visualization model and cross sections;
- ii) secures permits for, and begins flaring, existing relief wells (or continuing that flaring, to the extent it has already been initiated);
- iii) submits for review and approval a more extensive, ongoing monitoring and reporting protocol while the newly-installed and existing relief wells are operating;
- iv) collects data from both the newly-installed and existing relief wells;
- v) submits for review and approval a proposal of a network of dedicated groundwater monitoring wells in each of the four stratigraphic trap areas;
- vi) conducts extensive sampling of the groundwater monitoring wells, including a minimum of eight samples per well, per month, for a year, with quarterly sampling thereafter; and
- vii) uses all data generated, including integrating the groundwater monitoring well data with the potable well sampling data, to develop a fate-and-transport model.

Please let us know Peoples' response to the above positions. If you have any questions, please do not hesitate to follow-up.

Additionally, we wanted to see if you were available to touch base over the phone in advance of next Monday's hearing. We are generally available in the afternoons this week.

Thank you,
Natalie

IEPA-DIVISION OF RECORDS MANAGEMENT

RELEASABLE

FEBRUARY 15, 2022