

DRAFT

**Minutes from the Sub-Committee A Meeting
“Identifying potential and current contamination threats to the water
quality of the Mahomet Aquifer”**

May 21, 2018

Place: Champaign County Board; Brookens Administrative Center; 1776 East Washington Street
Urbana, Illinois.

Time Started: 10:00 AM

Time Adjourned: 12:04 PM

Members Present:

Charles Hostettler, PDC Technical Services

Alec Davis, Illinois Environmental Regulatory Group

Jim Risley, Mahomet-Seymour School District

Landon Stenger (Chief of Staff) for Senator Chapin Rose, 51st District

George Roadcap, Illinois State Water Survey/Prairie Research Institute

Eric Ballenger, Republic Services

Mayor Diane Marlin, City of Urbana

David Zimmerman, Tazewell County

Andrew Rehn, Prairie Rivers Network

Barb Lieberoff, Illinois EPA

Rick Cobb, Illinois EPA

TOPICS DISCUSSED:

Sub-Committee Chair Charles Hostettler opened the meeting by noting we were having technical difficulty with the conference call line. He also noted for the record that at the moment that in physical attendance we did not have a quorum so there would not be any approval of the minutes or any voting today. However, if there were any comments on the meeting minutes to forward them to Barb. Charles commented that he would like to begin with the first item on the Agenda.

Discussion of “Threat”

- a. Update on Threat Matrix (George)**

George Roadcap comments on his update of the Threat Matrix now called Source Matrix, that he has updated the chart to more of a flow chart. George discusses his handouts with the group. ***When the Source Matrix is to a draft point it will be posted on the webpage.** Rick Cobb comments on Class 4 regulations. Using landfills as an example, point of attenuation which is down gradient and they monitor and they must comply. Outside of those areas are the applicable classes for groundwater. Andrew Rehn comments so you are saying there are class 4 groundwaters that are naturally occurring b/c of TDS? Rick Cobb comments that is correct. Andrew Rehn comments could you make a distinction between class 1 and class 2? Rick Cobb comments that class 1 is a resource based classification not based on the water quality really based on the operational definition of what's an aquifer. The IPCB adopted those criteria for class 1. Anything that 10-4 hydrologic conductivity is considered class 2. It's not that those do not have standards b/c they do. George Roadcap comments for further reference 1,000 less permeability than the Mahomet Aquifer. George Roadcap continues discussion with the *Source Matrix* discussion. Andrew Rehn comments does this imply that all active primary source sites have groundwater monitor occurring and does potential secondary source sites have monitoring if it happens to be occurring is that how is this breaking down? George Roadcap comments I guess I'd have to respond to that No and No. Rick Cobb comments that with landfill regulations it's not required. There's a whole listing that with the parts would need groundwater monitoring. Andrew Rehn comments what do these labels mean if it doesn't imply monitoring? Why do we have potential primary sources and potential secondary sources labeled? Rick Cobb comments under the requirement of the committee we know it's a known source and to look at potential sources and the charge is to develop potential preventive before they become sources so that's why they are labeled that way. Charles Hostetler comments I think two things are getting mixed up here, one is what is the purpose of having these classifications that's a policy method and it was done a long time ago. It doesn't necessarily have anything to do with who's monitoring and who isn't. It's to help develop long term policy. The purpose of this group is to identify known and in particular Sub-Committee A, known and potential contamination threats to the Mahomet Aquifer. One of the things that we are trying to do today that I hope we make some progress on is to say in some detail what that means. So, this information about potential primary sources and potential primary secondary sources it was developed in the context of developing policy and can be useful to our thinking but it's not our definition. Andrew Rehn comments in regard to the source matrix then and the potential sources then what do we do with those then? Rick Cobb comments well we are getting into the protection side of things but absolutely things have been done for them, for example minimum protection zones are around all potable water supplies. George Roadcap comments on the label definition of his source matrix and will update on the confusion. George continues to comment on the source matrix and the Agencies involved. Rick Cobb and George discuss the Right to Know Process. Jim Risley comments on how information is sent to people at-risk where would you put in that category the People's Gas leak and who should of potentially notified the stakeholders

of what you are talking about? Rick Cobb comments there is always evolving environmental regulations and protections and currently Right to Know is triggered by a threat to exceeding a groundwater standard and we do not have a numeric standard for thermogenic source of methane gas, in fact nobody in the country does, in fact even regulating these is pretty brand new, it really wasn't regulated. So, if I were to want to fix that I would propose a methane standard under Part 620 and then that would tie into the existing Right to Know law that could trigger notification. Now, using the criteria that the Dept. of Interior has on 10ppm of methane, the threats for methane is explosion and asphyxiation. When we were there in the homes when we took our own samples we also had the four gas meters there was no ambient level detection of methane in the homes and to be a threat, and I'm not saying it wasn't a threat it was a bad thing and it should have been handled and maybe notification should be done differently. A 5% lower explosive limit if we would of detected that—we had Public Health with us b/c if we would of found that level we would of made a recommendation to leave the home. Fortunately, we didn't find that. Jim Risley comments so what you are saying is that there may need to be more legislation put on this from happening? Rick Cobb comments what's interesting is right about this time this was happening is on the federal level there was a law that did pass called the Pipes Act of 2016. Charles Hostetler comments that this info legislative information may be more pertinent to Sub-Committee B it's necessary new legislation required but thinking a new standard for groundwater that could come into play here. Andrew Rehn comments on the Right to Know process and who is getting the information. Rick Cobb comments in most cases it's the off-site potable well users. Andrew Rehn comments on other notifications such as coal ash and when do we take things more broadly? I feel like they should be included in this matrix. George Roadcap comments sure I tried to make an attempt but if you send them to me I can add them. If you look in the Public Health Advisories it will/could fall into that category. Rick Cobb comments that coal ash comes out of Illinois EPA violations and new impoundments etc. What Andrew is talking about is public input into technical review of the groundwater management zone. Andrew Rehn comments I am interested in that. What are the lists of notifications as a whole? George Roadcap comments that's a good point that may be helpful to have here. Rick Cobb comments if we would have found one of the standards to exceed in the coal ash in the wells we would of done a right to know. Charles Hostetler comments we'd used about half of our time now on talking about the process in general. This was a good discussion and I hope it appears well in the minutes so Sub-Committee B benefits from it. I'd like to keep us focused on threats and what it means to compile a source list. George Roadcap comments and he is completed with his discussion of source matrix.

b. Update on Regulatory Meaning of Threat (Rick)

Rick Cobb begins his presentation on What is Considered a Threat to Groundwater
A Threat is used in setting up prevention programs. When we use the word degradation or prevention program I use the word threat. There is a groundwater protection policy.

There are potential contamination sources, contaminant sources and contaminant as well. They are all explained and defined in statute. They have been around since 1970 of the Environmental Protection Act. No person should cause threaten or all the discharge of any contaminates.... Threat doesn't mean its already contaminated up to a numerical value..threat is a threat. This is key to protecting all 4 classes of groundwater.

There is also resource groundwater which means groundwater this presently being or in the future is capable of being put to beneficial use by reason of being of suitable quality. There is a Resource Based Groundwater Classification System (1-4). There is also a listing of preventing notification and preventive response activities. Preventing contamination before you exceed the standard. Potential primary source means any unity at a facility or site not currently subject to a removal or remedial action. Charles Hostetler comments on threat vs potential source...so if a RCCRA site is permitted and in compliance that site is considered not a threat am I correct? Rick Cobb comments that is correct. A potential source is something different. This is something different and is just a starting point for us. Needs assessment is starting with that potential source identifying if it's in a recharge area and then evaluating the hazards with each area. If the laws are controlling the measures then it's not considered a threat at all. There may also be an advisory of groundwater contamination to a county or municipality which has not prepared a groundwater protection needs assessment. This was done before the Right to Know laws were passed. Right to Know based on Threat (Soil/Groundwater). George Roadcap comments that if we want to continue with the flow chart he has some good direction on threat and ways to incorporate the comments. Alec Davis comments are there aspects of chemical that makes it a potential threat but then factoring where it's taken place and if there are protections already in place to minimize that threat there is an almost an analysis on site specific basis needed but then putting all that together and then ranking it on a quantitative priority it's a tremendous task and I don't' know how to implement George's tool...not that it's not a useful tool. Rick Cobb comments to chime in there we could add in there a tool to evaluate the hazards looking at my presentation in a summary fashion and telling you we are fortunate to have what you do have. Going in different directions with quantity vs quality b/c of the geology.

c. Threats in other Environmental Contexts (Charles)

Charles Hostetler comments on his letter that he sent to the group ([on the task force webpage](#)). This reminds us that we are here to compile a list of known or potential threats. I sent out an attachment (SCA memo) that was sent to all the members of the Task Force, that reminded us we are to compile a list of known potential threats. This term threat I think we have to understand that and this is one particular context in this email I also attached two examples I think could inform out thought process. This would be from due diligence and risk assessment. I also have some comments about the list of 52 that has been sent out, with some research I did in respect to this with Rick's prompting. This is

all historic landfills located in the counties of the Mahomet Aquifer and this map is on the Task Force webpage as well. Not just historic, its historic and existing. The second page of the attachment is 52 things and has Bureau of Land site number, so this is a starting point with in regard to, Sen Rose's intent remember he said two things; old landfills we don't know what's in them and they have never been monitored. What that means for our purposes pre IEPA there was not definition of hazardous waste so literally anything could be in there. Those were largely regulated by Public Health and by City's. These landfills will not be in IEPAs database but the local officials may have record of them. We do need to get a hold of what is called chapter 7 landfills and that would fall under Sen. Rose's request. Then what we have is what I call 807 and 811 landfills, probably 807 landfills do not have hazardous waste in them after the manifest system but they might not have groundwater monitoring in them. There are some of those in this list of 52. We need to check those on a case by case basis. Finally, the remainder 807 and 811 do not fall under what Sen Rose requested. I wanted to make sure the record shows we listened to that request and we gave it some thought. George Roadcap asks would one of our tasks be to look at that list of 52 and see what has been done? Charles Hostetler comments if we are going to do at least two things look at the list of 52 and whittle out the wheat from the chaff. Rick Cobb comments that he has emails out to IEPA staff to field office staff in Peoria and Champaign to answer some of those questions. Andrew Rehn comments would we need to call towns and ask what information they know regarding these closed landfills? Do we think they'd want to give that information up/economic burden per say? Charles Hostetler comments that's a possibility and I have brought this up before for the full Task Force and I think this is matter for Sub-Committee B. Our job is to provide a list we need to provide a list that will be most useful to Sub-Committee B. Provide some data gaps as well to Sub-Committee B and the Task Force as whole. George Roadcap comments we could go to IEPA FOIA site and find out what is there as well.

Discussion of Definition of Work Product

Charles Hostetler comments this gets us to the point where I want to ask the group what does our product look like? I'd like to open the floor what could we do to narrow the universes of known or potential threats for the package. I jotted down a couple suggestions already was to restrict the area of scope, maybe to the recharge areas, pilot project, type of source. They all have the pluses and minuses but we have to decide if we are going to get something to the full task force before September. Let's have a discussion about that and send them to Barb for distribution and send them to Barb before the next meeting and we can discuss. Jim Risley comments I've looked through a lot of things distributed though emails and they divide contaminations and I think we look at that closer...types of contaminations. Jim Risley will forward this to Barb and can distribute for discussion at next meeting. George Roadcap comments look at source water protection documents that have been completed in other communities and what have they done. Rick Cobb comments that is not a bad place to start b/c

they have done inventories on sources for water quality etc. Charles Hostetler comments that's a good source so my question on that is are we going to rely on one person to get hundreds of pdf's and digest and make summary of them and if we are going to ask someone else to do the work and it may have the flavor that was the legislative intent and on the other hand we as a group may not have the time...these are the questions to think about. Jim Risley comments I think the answer is it depends on what you're looking for. Eric Ballenger comments it would be good to look at permitted subtitle D landfills over the aquifer we already have that in place. Charles Smith comments we have to have some guidelines some starting point in order to move forward. There are a lot of variables here. It does bring thoughtful thinking. Diane Marlin comments and asks regarding a budget...do we have one? Consensus was no. Back to making phone calls on the 52 landfills. I wouldn't expect us to get any of the answers. Back to restricting the scope do we know where the recharge areas are? Rick Cobb shows the map of the recharge areas and the reasons and why the map was done for planning. Diane Marlin comments that our focus should be on the recharge and top priorities and inform the legislators of such. Discussion commences on prelaw IEPA landfills. What is exempt closed or meet new design standards. Eric Ballenger comments on the 807 and 811 sites and monitoring.

Future Sub-Committee Meetings, Venues, and Speakers

Charles Hostetler comments that the main Task Force meeting will be June 18th. We are currently meeting the 3rd Monday of the month. Barb comments that the 3rd Monday is June 18th and we could have both meeting and Sub-Committee A in the afternoon. Sub-committee A will meet next on June 18th. Charles Hostetler ask if there are any additional speakers or venues please email to Barb.

Sub-Committee Comments

No comments

Public Comments

Randy Locke-PRI/ISWS appreciates the discussion. Important for the sub-committee to continue the potential contamination threat/potential contamination source/contaminant threat with threat being the highest risk and sending that the sub-committee B. Appreciated the regulatory presentation by Rick. Identifying the gaps in the regulatory side. More complete picture of protecting the aquifer. Edges of the western side of aquifer is still uncertain.

Chris Stohr-Champaign Co Board-prelaw landfills about 218. 99 of those lie over shallow aquifers. Something that the committee could look at. Offers to give talk of the old closed landfills.

Adjourn

Not a quorum. Diane Marlin motioned to adjourn. Jim Risley seconded. Meeting adjourned.