Nicor Gas and ComEd COMMUNITY RELATIONS PLAN

AURORA MANUFACTURED GAS PLANT SITE ENVIRONMENTAL PROJECT

River Street between North Avenue and Prairie Street Aurora, Illinois March 2014

COMMUNITY RELATIONS PLAN Aurora Manufactured Gas Plant Site River Street between North Avenue and Prairie Street March 2014

1. Overview of the Community Relations Plan

The Community Relations Plan describes the strategy for informing the public about an environmental project at a former manufactured gas plant site located on and near the property at 408 and 424 S. River St. in Aurora, Illinois. Between approximately 1868 and 1925, gas was manufactured from coal at this location for distribution to the community. Nicor Gas and ComEd (the utilities) are jointly conducting the project as part of a comprehensive program to evaluate environmental conditions at historical gas manufacturing facilities. Under an agreement between the two utilities, Nicor Gas is taking the lead in managing site activities.

The goal of the project is to identify impacts to the environment from former gas manufacturing operations; evaluate environmental impacts; and undertake remedial actions to bring the site up to current environmental standards. The project is being conducted in cooperation with the Illinois Environmental Protection Agency (Illinois EPA) through the agency's voluntary Site Remediation Program (SRP).

The Illinois EPA has determined that this site is subject to the notification requirements of the 2006 Community Right-To-Know law (Illinois Environmental Protection Act at 415 ILCS 5/25d-1–25d-10 (P.A. 94-314) because of potential environmental impacts that may pose a risk to public health. Nicor Gas has accepted Illinois EPA's offer to conduct notification of the public about the impacts from the historic gas manufacturing operations. Therefore Nicor Gas has compiled a public notification list and developed a fact sheet about remediation of the Storeroom Facility property in early 2014. Illinois EPA has reviewed and approved these documents.

The community relations program is designed to provide the community (including government officials, Nicor Gas employees at the River Street facility and surrounding neighbors) with the following:

- 1) A general understanding of the former MGP site and associated site history.
- 2) A summary of previous investigations and remedial actions undertaken at the site.
- 3) An overview of the upcoming site activities and measures taken to remediate and bring the site up to current environmental standards.
- 4) Specific actions the utilities are pursuing to establish, maintain and develop clear lines of communication with the community, in addition to soliciting and addressing concerns that may arise.
- 5) Helpful references and contacts to address requests for additional information.

2. Site Description

Before interstate pipelines made natural gas available in this area, gas was manufactured using a variety of raw materials, most commonly coal and oil. The gas was stored in large cylindrical tanks, known as gas holders, until it was distributed to homes and businesses in the community. Manufactured gas provided energy for cooking, lighting, heating and industrial processes. At one time up to 3,000 plants operated in the United States. Manufactured gas ceased to be a major energy source in Illinois by the 1940s. A manufactured gas plant (MGP) was located on the east and west sides of South River Street. It operated between approximately 1868 and 1925, serving as an important energy provider for the community, although full production ceased in 1912 when manufactured gas was transported to Aurora by pipeline from a plant in Lockport, Illinois. In the 1920s, a large gas holder was constructed north of the railroad tracks on Hurds Island in the Fox River east of the MGP.

The portions of the Aurora MGP site located on the west bank of the Fox River, which extend on both sides of River Street from North Avenue southwest to Prairie Street, are known as the East Facility, West Facility and Storeroom Facility. Nicor Gas owns the East and West Facilities and has used them as an employee reporting center, for fleet maintenance, and for storage of equipment and supplies. Nicor Gas sold the Storeroom Facility to a private firm in 1999, and Nicor Gas and Commonwealth Edison jointly purchased the property in 2011.

The Aurora Park District's Hurds Island Park is located on the northern portion of the island where the gas holder was once located. Steck Park is on the far side of North Avenue on the west bank of the Fox River. Commercial areas are to the north and south, with residences and businesses west and northwest of the site.

3. Environmental Investigation and Remediation Phases

Beginning in the 1990s, an engineering firm hired by Nicor Gas performed environmental assessments in areas where historical maps indicated remnants of the gas plant structures might remain below ground as well as in the surrounding area. The investigations located gas manufacturing residuals and byproducts, primarily coal tar, in underground structures and soil and groundwater impacted with substances typically found at former MGP sites.

The results of these studies indicated the site posed little risk to people on or near the property since the impacts are beneath the ground where people do not come in contact with them. The city's drinking water, which is supplied from deep wells a half-mile and more away from the site is not affected. In order to bring the site up to current environmental standards, in 2002 and 2005 the utilities undertook remedial actions to remove gas manufacturing residuals and impacted soil for off-site disposal on the Nicor Gas property. In addition, two underground gasoline storage tanks were removed from the Storeroom Facility in 1999.

The remedy for the one-acre Storeroom Facility portion of the MGP site consists of excavation and removal for off-site disposal of the gas manufacturing byproduct coal tar and impacted soil.

The goal of the Storeroom Facility project is to restore the property to meet today's environmental standards. Upon conclusion of the work, the utilities will submit a report to

Illinois EPA and apply for a "No Further Remediation" letter that indicates the property is safe for any use. Once issued by the agency, this document will be filed with the Kane County Recorder.

4. Community Background

Community Profile

Aurora (2010 population 197,899) is located in the Fox River Valley at the western edge of the metro Chicago area. Its population makes it the second largest city in Illinois. Residents of Hispanic/Latino heritage comprised approximately 41% of the city's population in 2010. Major employers are heavy equipment manufacturer Caterpillar, two medical centers and public school districts.

Aurora is governed by a mayor and 12 aldermen, 10 of which are elected by ward and two elected at-large. The Fire Department provides emergency response service. Nicor Gas provides natural gas service and ComEd provides electricity.

Community activities are typically covered by the Aurora *Beacon News* and AM and FM radio stations.

As with many communities with a long industrial history, Aurora has had some experience with environmental remediation projects, primarily Brownfield sites.

Community Interests

Based on experience with similar environmental projects, residents nearby may be interested in the following during the course of the Storeroom Facility remedial action:

- Additional vehicles in the vicinity used for project activities. There will be increased traffic
 when material is being removed from the site and clean fill is being brought to the site. Signs
 and flaggers will be utilized around site activities, when necessary, to to guide safe traffic
 flow.
- Traffic and parking restrictions that may impact daily activities in the neighborhood. In order to protect people traveling through the area, the sidewalks along the River Street and Prairie Street sides of the property will be closed. In addition, the westbound right lane of Prairie Street and the southbound right lane of River Street will be closed for much of the project.
- Odors. There may be a release of odors while the project is in progress. Depending on the circumstances, odors may occur near the site. Foams and tarps are used to minimize odors.
- Air quality. The removal project will be conducted under a health and safety plan. An air monitoring program will be used to document that there are no adverse impacts to air quality in the area.

It is the utilities' experience that community concerns that may be identified can be addressed through an ongoing public communications effort before and during project activities. As described in more detail below, information is provided through various communication channels.

Chronology of Community Involvement

Since the first environmental investigation at the MGP site in 1995, Nicor Gas has kept the community informed of major project activities, distributing fact sheets to key stakeholders, issuing news releases and providing an information repository at the library.

5. The Community Relations Program

The community relations program for the Storeroom Facility remedial phase will involve regular communication with government officials, people in the vicinity, Nicor Gas employees and other interested individuals and organizations. The utilities will monitor possible concerns and provide responses as needed.

The community relations program includes the following elements:

- Identify public officials, community leaders, nearby property owners, users and occupants and area organizations that may have an interest in the environmental project. Media organizations that cover Aurora activities are also identified.
- Place copies of project work plans and reports and communications distributed to the public in the information repository at the Aurora Public Library's Reference Desk, 1 E. Benton Street. Phone: 264-4100. www.aurora.lib.us.
- Maintain a public notice list to distribute fact sheets and status reports to the community.
 The list in Attachment A includes residents and businesses in the vicinity, local government
 officials, federal and state legislators, and Illinois Environmental Protection Agency and
 Illinois Department of Public Health staff.
- Issue fact sheets with cover letters and news releases that explain any major impending work at the site, describe how citizens may ask questions and offer comments, and direct interested citizens to the information repository at the Aurora Public Library.
- Nicor Gas staff is available for meetings or telephone conversations with interested officials and residents.

Nicor Gas's designated information contacts are:

Tom Kallay, Director Regional Community Relations & Economic Development, by phone: 630.816.0147, by email: tkallay@aglresources.com or by mail: 1844 Ferry Rd., Naperville, IL 60563

Annette Martinez (for media inquiries), Director External Relations, 630-388-2781; amartinez@aglresources.com

The contact for information about Illinois EPA's oversight of the project is: Carol Fuller, Office of Community Relations, 217.524.8807; carol.fuller@illinois.gov