

1 Gas and Waterloo Electric-Farm facilities. I obtained my current position on March 1,
2 1989.

3 **Q. Please describe industry-related activities in which you have participated.**

4 A. I was the first of a group of Company employees assigned specifically to deal with former
5 manufactured gas plant (MGP) remediation. I have been project manager on numerous
6 MGP sites. I have experience in all phases of project work including title
7 searches/historical checks, intrusive investigation work, intrusive remedial actions,
8 budgeting and administration. The project work includes direct oversight and
9 management of non-company personnel, direct contact with relevant regulatory agencies,
10 direct contact with other potentially responsible parties and performance of all duties that
11 insure compliance with State and Federal laws.

12 **Q. What is the purpose of your prepared direct testimony in this proceeding?**

13 A. The purpose of my testimony is to discuss the technical work associated with the
14 environmental remediation activities at the former manufactured gas plant site located at the
15 Moline Generating Station. The site is now the responsibility of MidAmerican.

16 **Q. What environmental regulatory agency is overseeing MEC's work at the former
17 manufactured gas plant site located at the Moline Generating Station?**

18 A. The Illinois Environmental Protection Agency (IEPA) was providing this oversight.

19 **Q. Please provide a background of the regulatory compliance activities at the Moline site.**

20 A. The remedial investigation study for the site was submitted to IEPA in April 1993. This
21 study characterized conditions at the site, identifying the sources of contamination, pathways
22 of possible releases to the environment and the extent of potential human or environmental
23 exposure to contamination at the site. This study was approved by the IEPA in October 1993.

1 The risk assessment study for the site was submitted to the IEPA in February 1994. This
2 study employed risk assessment methodologies consistent with those used by the United
3 States Environmental Protection Agency (USEPA) to assess and quantify potential human
4 health and environmental risks posed by the site. The study also developed 'site specific' risk
5 based soil cleanup levels for the contaminants of concern at the site based on a less restrictive
6 standard than the risk standard originally required by the IEPA. This study was approved by
7 the IEPA in May 1995. The feasibility study was submitted to IEPA in March 1994. This
8 study evaluated a series of alternatives, including costs, for remediating the site. This study
9 was approved by the IEPA in April 1995. The work plan for soil remediation at the site was
10 submitted to IEPA in February 1995. This plan described how contaminated soil at the site
11 would be remediated. This plan also included information on site safety, quality assurance
12 and sample collection. This plan was approved by the IEPA in May 1995. A site
13 groundwater characterization work plan was submitted by MidAmerican to the IEPA in
14 February 1996. This plan included a well search to identify potential groundwater receptors
15 within a 1-mile radius of the site. This plan was approved by the IEPA in February 1996.
16 The site has since undergone continuous quarterly groundwater sampling and data analysis to
17 determine groundwater impact. A notice of No Further Action was received for this site from
18 IEPA in December 2001.

19 **Q. Please discuss the physical remediation work which took place from October 2001 to**
20 **September 2002.**

21 A. MidAmerican's contractors monitored the site groundwater in accordance with previous
22 approvals by the IEPA. The monitor wells were then abandoned with IEPA approval and a
23 No Further Action notice was issued by that agency in December 2001.

24 **Q. Please provide examples of cost savings strategies used while the technical work was**

1 **performed during the October 2001 to September 2002 time period.**

2 A. No new cost saving measures were instituted during this time period. All investigations and
3 remedial activities were complete. The site was actively undergoing the closure process
4 during the last quarter of 2001.

5 **Q. Please describe how site costs incurred during the October 2001 to September 2002 time**
6 **period relate to those costs previously presented to the Illinois Commerce Commission.**

7 A. The work performed during the period in question is a continuation and progression of the
8 work approved by the IEPA and required by MidAmerican's work plans. MidAmerican is
9 under a legal obligation to continue the work and respond to any site conditions that were
10 unknown at the time the work plan was written, and follow good environmental remediation
11 practices.

12 **Q. Has MidAmerican been prudent in its remediation of the Moline site?**

13 A. Yes it has. MidAmerican followed good management practices and protocols in evaluating
14 the site and in contracting for the remediation work at the site. MidAmerican has worked
15 with the IEPA to adopt appropriate cleanup standards and methods which minimize costs
16 consistent with public safety and the Orders of this Commission. MidAmerican has made
17 appropriate investigations of the issues and facts in order to make reasoned and appropriate
18 decisions with regard to site remediation.

19 **Q. Does this conclude your prepared direct testimony?**

20 A. Yes, it does.