

**Sauget Industrial Corridor Sites
Natural Resource Damage Assessment Process
St. Clair County, Illinois
July 2013**

You are cordially invited by the Illinois State Trustees (Department of Natural Resources, Environmental Protection Agency (both represented by Office of the Attorney General) and Missouri Department of Natural Resources) to attend a **public meeting to announce the release of the Natural Resources Damage Assessment (NRDA) Assessment Plan for the Sauget Industrial Corridor Sites. The public meeting is being held on August 6, 2013 at 6:30 PM - 8:00 PM at the Cahokia Village Hall's Training Room located at 103 Main Street, Cahokia, Illinois.**

This public meeting will include a presentation discussing an overview of natural resources damage assessment (NRDA) and the NRDA Plan. This natural resource damage assessment is being undertaken by US Fish & Wildlife Service and the Illinois and Missouri Trustee agencies (see above) at the Sauget Industrial Corridor (SIC) Sites. The Sauget Industrial Corridor Sites are located within the Villages of Sauget, Cahokia, and East St. Louis, in St. Clair County, Illinois.

As required by a variety of Federal laws, Natural Resources Damage Assessment (**NRDA**) involves ecological or environmental restoration which is the process of assisting with the recovery of an ecosystem (biological community of interacting organisms and their physical environment) that has been degraded, damaged or destroyed. (**Bold** words and acronyms are further explained in the Question and Answer Section of this fact sheet.)

Site Background

The Sauget Industrial Corridor (SIC) Sites are located within the Villages of Sauget, Cahokia, and East St. Louis, in St. Clair County, Illinois. The Assessment Area encompasses an area on the Mississippi River floodplain in Illinois that includes the SIC Sites, as well as, the surrounding and down-gradient natural resources and areas including groundwater, the floodplains, Dead Creek, Prairie du Pont Creek, Cahokia Chute, and the Mississippi River.

Currently, the SIC Sites are comprised of various facilities, landfills, disposal areas, and other properties. The site properties are generally referenced as *Sauget Area 1*, *Sauget Area 2*, *W.G. Krummrich Plant*, and the *Clayton Chemical Site*:

- *Sauget Area 1* was proposed for listing on the United States Environmental Protection Agency's (USEPA) National Priorities List (NPL) [66 Fed. Reg. 47612-01 (proposed Sept. 13, 2001)] which is the list of hazardous waste sites eligible for long-term remedial action (cleanup) and warrant further investigation. Sauget Area 1 is located in Sauget and Cahokia and contains Sites identified as Dead Creek Segments A, B, C, D, E, and F (which includes Borrow Pit Lake), and Sites G, H, I, L, M, and N.

- *Sauget Area 2* is also proposed for listing on the NPL [66 Fed. Reg. 47612 (proposed Sept. 13, 2001)]. Sauget Area 2 is located in East St. Louis, Sauget, and Cahokia and contains Sites O, P, Q, R, and S, and a groundwater discharge area of the Mississippi River, adjacent to Site R. Contaminated groundwater in this area is from Sauget Area 1, Sauget Area 2, the Krummrich Plant, and the Clayton Chemical site.
- *The W.G. Krummrich Plant*, located in the village of Sauget, is the subject of a Resource Conservation and Recovery Act (RCRA) enforcement action.
- *The Clayton Chemical Site* (or RRG/Clayton Chemical Company Site), also located in Sauget, is identified by the USEPA as an Eligible Response Site and is the subject of a CERCLA enforcement action. (CERCLA is the Comprehensive Environmental Response, Compensation, and Liability Act or “Superfund” and is the law that provides a process for how to clean-up a site that has hazardous waste contamination.)

Environmental Investigations

As part of the remedial investigation (RI), sampling is now largely complete. The RI involves gathering information which is used to define the risk at a site. In addition, feasibility studies (FS) have been completed for Sauget Area 1 and Sauget Area 2. The FS examine what actions could be undertaken to reduce the risk to acceptable levels. These RI/FS reports have been finalized and can be reviewed at the SIC Information Repository at the Cahokia Public Library, 140 Cahokia Park Drive or by contacting USEPA Region V in Chicago (see web address below).

(Note: All final technical documents can be reviewed by the public at the Information Repositories or by contacting USEPA.)

In addition, a Natural Resource Damage Assessment Plan was developed to take advantage of the results from the RI/FS investigation. However, NRDA provisions allow Trustees to collect appropriate and necessary data that may not have been developed during the RI/FS. A NRDA Pre-Assessment Screen (**PAS**) for the SIC sites was completed in April 2009 and signed by the Trustees. The PAS can also be reviewed by the public at the Information Repository.

Questions and Answers

What is a Natural Resource Damage Assessment (NRDA)?

The NRDA is used in environmental restoration to repair or compensate for natural resource losses and injuries caused by oil or hazardous substances released into the environment. Natural resources include land, air, surface and ground water, fish, plants and wildlife (biota).

<p>Who are the Trustees?</p>	<p>Trustees for the NRDA are:</p> <ul style="list-style-type: none"> • Illinois Environmental Protection Agency • Illinois Department of Natural Resources • U.S. Fish and Wildlife Service • Missouri Department of Natural Resources
<p>Please describe the NRDA process.</p>	<p>The NRDA is a multi-step process that begins with a Pre-Assessment Screen (PAS). The PAS is a review of site-specific data to determine whether a release of contaminants may have injured natural resources and to determine how necessary assessment data can be obtained.</p> <p>Results from the PAS indicated the presence of uncontrolled waste and other contamination at various locations throughout portions of the site. Therefore, PAS data supported the Natural Resources Trustees' decision to proceed to assess injuries to natural resources, which may then be evaluated and converted to actual damages in the damage determination phase. The Trustees have published an Assessment Plan (January 2013) to outline the steps to be taken for further investigation.</p> <p>Following and/or concurrent with the assessment work, the Trustees will evaluate a number of alternatives to adequately address the resource injuries. Once the process is completed, a restoration plan that outlines those projects will be developed and made available for public comment. The final step is to implement the plan and to ensure restoration projects are meeting their goals.</p>
<p>Will information collected during the RI process under Superfund provide the data necessary for the NRDA?</p>	<p>In a typical RI, obtained information is not specific enough to adequately address all of the NRDA concerns. However, as identified in the Assessment Plan, the Trustees intend to use this information as a proper first step to evaluate the NRDA.</p>
<p>What is the study area?</p>	<p>The scope of the areas to be studied includes the geographical description above and potentially any natural resource outside the site that has been potentially affected by site contamination.</p>

What will be done to investigate the fish and wildlife habitat (i.e. wetlands and other areas that provide habitat for migrating birds)?

As previously stated, the state and federal Trustees completed a Pre-Assessment Screen in 2009 and prepared an Assessment Plan in 2012. The Assessment Plan presents how the Trustees intend to investigate injury to wildlife, plants, soils, sediments, wetlands, streams and groundwater resources that may have been affected by release of hazardous waste in the surrounding area.

The data collected for the remedial investigation and additional reports will be used to determine the extent of natural resource injuries to wildlife habitats, including wetlands, streams, biota and groundwater.

Will the eventual cleanup allow for long-term land reuse plans that might include parks, recreational areas or conservation areas?

Once injuries have been determined and damages evaluated, a plan will be developed to compensate the public as a whole for the injuries. The Trustees will evaluate all possible alternatives for long-term land reuse, including restoration of natural resources for use as parks, recreational areas or conservation areas. The Trustees will select an alternative based on regulatory criteria and public input.

Many factors are considered when developing and selecting restoration plan options, such as the type of resource injured, the extent of the cleanup, the cost, public comments, landowners' intentions for the property, and community land-use plans.

Will there be any public involvement in the NRDA process?

Yes. The Natural Resource Trustees will host a public meeting in the summer of 2013 (see invitation above). The Trustees will be available to answer questions about the Natural Resource Damage Assessment process; representatives from Illinois EPA will respond to questions about the ongoing RI/FS-related site work. In addition, a display ad announcing this public meeting will be placed in the *Belleville News Democrat* and *The Herald*. Technical documents from the NRDA investigation can be reviewed at the Information Repository (address listed above). Selected documents are available on the US Fish & Wildlife Service website at <http://www.fws.gov/midwest/es/ec/nrda/Sauget/index.html>.

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