

# U.S. FISH AND WILDLIFE SERVICE POLLUTION/SITUATION REPORT

Crab Orchard National Wildlife Refuge Area 7 Pesticide Removal Area – Initial PolRep



## UNITED STATES FISH AND WILDLIFE SERVICE MIDWEST REGION

**Subject:** POLREP #1 Initial  
Area 7 Pesticide Area Non-Time Critical Removal  
MARION, IL  
Latitude: 37° 40'50.05 N Longitude: 88° 59'29.30" W

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**From:** Timothy Rodeffer, USFWS Project Manager

**Date:** 3/4/2024

**Reporting Period:** 3/4/2024 – 11/31/2024 (approximate)

### 1. Introduction

#### 1.1 Background

**Site Number:**

**D.O. Number:**

**Response Authority:** CERCLA

**Contract Number:**

**Action Memo Date:** 4/4/2018

**Response Type:** PRP Oversight

**Response Lead:** PRP  
**NPL Status:** NPL  
**Mobilization Date:** 3/4/2024  
**Demob Date:** TBD  
**CERCLIS ID:** IL8143609487  
**ERNS No.:**  
**FPN#:**

**Incident Category:** Removal Action  
**Operable Unit:** AUS  
**Start Date:** 3/4/2024  
**Completion Date:** (approx. Nov.2024)  
**RCRIS ID:**  
**State Notification:** ILEPA  
**Reimbursable Account #:**

### **1.1.1 Incident Category**

Non Time Critical Removal Action- PRP/USFWS Oversight

### **1.1.2 Site Description**

The project area consists of 4 buildings and the footprint of surrounding contaminated soils, totaling approximately 7 acres.

#### **1.1.2.1 Location**

Area 7 of the AUS OU is located 4.5 miles southwest of Marion Illinois, approximately 1.5 miles east of the intersection of Highway 148 and Ogden Road, and approximately 0.5 miles north of Ogden Road. The removal action area is the northwest corner of Area 7 and the command center is onsite.

#### **1.1.2.2 Description of Threat**

Warehouse buildings IN-1-3 through IN-1-6 of Area 7 contain pesticides (aldrin and dieldrin) in the soil, on interior building surfaces. Asbestos exists in the warehouses slated for demolition.

### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

A PA/SI conducted in 2000 had concentrations in exceedance of screening criteria for several pesticides in both the 0.0 to 0.5 foot interval and the 0 to 2 foot interval. The following constituents were identified as either contaminants of potential concern for human health risk or contaminants of potential concern for environmental risk 4,4'-DDD, 4,4'-DDE, 4,4'-DDT, aldrin, alpha-chlordane, beta-BHC, dieldrin, endosulfan sulfate, endrin, endrin aldehyde, gamma-BHC, gamma chlordane, heptachlor, heptachlor epoxide, isodrin, and methoxychlor. While several different pesticide compounds were detected at each of these sampling locations, aldrin and dieldrin were the predominant soil contaminants, in terms of both frequency of detection and concentrations detected. Concentrations ranged up to 520 mg/kg for aldrin, and 290 mg/kg for dieldrin.

Aldrin and dieldrin were the primary contaminants in the interior dust and wipe samples in the Warehouses, in terms of maximum concentration and frequency of detection.

Several sediment samples were collected from surface drainages west and north of the Warehouses, as well as from the central drainage downstream of the site. A phase I EE/CA performed in 2014 revealed that the Area 7 Pesticide project area was not a source of pesticides in sediment in Crab Orchard Lake.

## **2. Current Activities**

### **2.1 Operations Section**

### **2.1.1 Narrative**

The overall project will take place from March 2024 to approximately November 2024. Phases include mobilization to the site, warehouse clearing and tree removal, warehouse abatement and demolition of concrete slabs, brush clearing and baseline soil sampling, laboratory analysis of samples and supplemental samples if needed, identification of extent of soil excavation, slab removal and soil excavation and disposal, and site restoration.

### **2.1.2 Response Actions to Date**

In 2003 some of the sealed packages in building IN-1-6 were wiped clean and returned to their owner. Outside of that action there has been no removal of contents of the Warehouses (IN-1-3, -4, -5, -6) or of soil within Area 7, Pesticide Area.

### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

On July 26, 2012, Great Lakes Synergy Corporation (GLS) and the United States Fish and Wildlife Service (FWS) entered into an Administrative Settlement Agreement and Order on Consent (AOC) for an Engineering Evaluation/Cost Analysis (EE/CA) for the Crab Orchard National Wildlife Refuge, Additional & Uncharacterized Site Operable Unit (AUS OU), Area 7 Pesticide Area. TRC Environmental Corporation (TRC) submitted the EE/CA to the Federal Facilities Agreement (FFA) partners in January 2018. On April 4, 2018, the USFWS issues an action memorandum approving the Removal Action (RA). GLS and the FWS negotiated the terms of a Consent Decree (CD) to perform a RA. The CD was lodged with the district court on June 6, 2023, and entered on July 30, 2023.

### **2.1.4 Progress Metrics**

None to report at this time.

## **2.2 Planning Section**

### **2.2.1 Anticipated Activities**

During the next reporting period, the following activities are expected to occur:

- Site mobilization
- Cleaning of warehouse and tree clearing prior to bat roosting season
- Abatement and demolition to slabs of warehouse
- Brush clearing, establishment of decontamination facilities
- Remedial Design soil sampling for baseline samples
- Laboratory analysis of baseline soil samples
- Supplemental remedial design soils samples (as needed)
- Identification of the extent of soil excavation
- Agency concurrence of extent of soil excavation
- Slab removal and soil excavation and disposal

-Site restoration

#### **2.2.1.1 Planned Response Activities**

See Section 2.2.1

#### **2.2.1.2 Next Steps**

See Section 2.2.1

#### **2.2.2 Issues**

None

### **2.3 Logistics Section**

The project command center is located on site. Soils removed will be taken off site to an approved landfill compliant with the CERCLA off site rule.

### **2.4 Finance Section**

No information available at this time.

### **2.5 Other Command Staff**

#### **2.5.1 Safety Officer**

Robert Rydell, TRC Companies

#### **2.5.2 Liaison Officers**

In accordance with the signed CD (June 30, 2022), FWS has designated Timothy Rodeffer as its Project Coordinator and EPA has designated Viral Patel as its On-Scene Coordinator ("OSC"). The OSC and FWS' Project Coordinator shall have the authority vested in an OSC by the NCP, including the authority to halt, conduct, or direct any Work required by the CD or to direct any other removal action undertaken at the Site. Katherine Vater will be the Senior Project Manager for TRC (contractor for Great Lakes Synergy Corporation)

This site is located behind a controlled gate. Nearby tenants and FWS personnel will be notified by USFWS of activities, timing of activities, and site-specific layout. The area is not in a location where tenants or USFWS personnel would have a need to be in, so impacts or conflicts with ongoing activities and personnel are expected to be negligible.

#### **2.5.3 Information Officer**

Tim Rodeffer, FWS, and Viral Patel, USEPA, will serve as the information Officers for this Action and will ensure the Information Repository is updated.

## **3. Participating Entities**

### **3.1 Unified Command**

N/A

### **3.2 Cooperating Agencies**

USEPA

ILEPA

USFWS

USDOJ

## **4. Personnel On Site**

Personnel from USEPA, USFWS, TRC, Earth Services, AECOM, and other subcontractors of the PRP, are expected on site during the reporting period. Generally, staff numbers will be 1-3 persons on site, however during the soil removal and building demolition periods, up to approximately 12 individuals may be on site.

## **5. Definition of Terms**

ILEPA- Illinois Environmental Protection Agency

USFWS- United State Fish and Wildlife Service

USACE- Unites States Corps of Engineers

TRC- TRC

PolRep- Pollution Report

PRP- Potentially Responsible Party

USEPA- United States Environmental Protection Agency

TRC- TRC Companies

TBD- To Be Determined

GLS- Great Lakes Synergy Corporation

AOC- Administrative Settlement Agreement and Order on Consent

EE/CA- Engineering Evaluation/Cost Analysis

RA- Removal Action

CD- Consent Decree

AUS OU- Additional & Uncharacterized Site Operable Unit

ASDTR- Agency for Toxic Substances and Disease Registry

## **6. Additional sources of information**

Additional sources of information are on file at the USFWS Crab Orchard National Wildlife Refuge Headquarters Building located at: 6987 Headquarters Road, Marion Illinois.

### **6.2 Reporting Schedule**

This is the initial PolRep, a final PolRep will be produced at the end of the project.

## **7. Situational Reference Materials**

No information available at this time.