



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGIONS 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



236131

REPLY TO THE ATTENTION OF:

October 6, 2006

SF-6J

Mr. Frank Horvath, Chief
Damage Assessment and Response
U.S. Fish & Wildlife Service
1 Federal Drive, BHW Federal Building
Ft. Snelling, MN 55111-4056

RE: Letter from R. Thorson, U.S. FWS to B. Mathur, U.S. EPA Region 5, dated September 28, 2006

Dear Mr. Horvath:

U.S. EPA Region 5 recently received the above referenced letter. In that letter, the U.S. Fish and Wildlife Service (Service) articulated a number of concerns with respect to certain components of the proposed remedial action to address groundwater contamination in the PCB Areas Operable Unit (PCBOU) at the Crab Orchard National Wildlife Refuge. Specifically, the Service expressed concerns related to the proposed remedy for "Plume 2". These concerns are expressed in the context of potential health and safety risks that the Service believes the proposed Plume 2 remedy (electric resistive heating or ERH) may present with respect to the operations of your tenant, General Dynamics Ordinance and Tactical Systems. The letter also states that due to these potential safety concerns pertaining to the Plume 2 portion of the proposed remedy, the Service is unable to concur with the remedy as outlined in the Proposed Plan.

In response to your concerns as stated in your letter of September 28, 2006, U.S. EPA has elected to defer that portion of the remedy pertaining to Plume 2 to a subsequent ROD Amendment. This subsequent ROD Amendment will be completed after further discussions between the Service, Illinois EPA, your tenant, and EPA can be conducted and your safety concerns are vetted and addressed as appropriate. Meanwhile, in order to maintain forward progress on the site, I have directed my staff to revise the existing PCBOU ROD Amendment to retain only the remedies for Plumes 1 and 3. This revised ROD Amendment is enclosed with this letter. U.S. EPA respectfully requests that the Service either sign or concur with this document within 30 days.

As stated above and pursuant to your request, U.S. EPA is willing to enter into further discussions with our Federal Facilities Agreement (FFA) partners and your tenant

regarding the safety issues pertaining to the proposed ERH remedy for Plume 2. We would like to begin these discussions as soon as possible. Please have your staff contact Nanjunda Gowda, U.S. EPA Remedial Project Manager at (312) 353-9236 to coordinate these discussions.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary M. Schafer". The signature is fluid and cursive, with the first name "Gary" being the most prominent.

Gary M. Schafer PG
Chief – Remedial Response Section 6 (Federal Facilities)
Superfund Division
U.S. EPA Region 5

Enclosure: Revised PCBOU ROD Amendment for Plumes 1 and 3

cc: Robert Carson – IEPA w/enclosure