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United States Department of the Interior

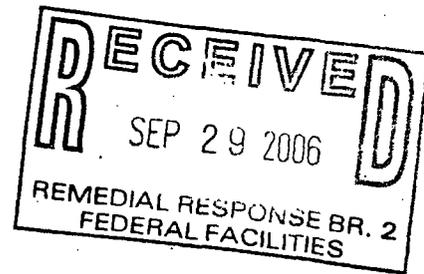
FISH AND WILDLIFE SERVICE
Bishop Henry Whipple Federal Building
1 Federal Drive
Fort Snelling, MN 55111-4056

SEP 28 2006

EPA Region 5 Records Ctr.



236132



Mr. Bharut Mathur, Acting Regional Administrator
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard R19-J
Chicago, Illinois 60604-3590

Dear Mr. *Bharut* Mathur:

I am writing to share with you the concerns of the U.S. Fish and Wildlife Service (Service) regarding certain components of the proposed remedial action to address groundwater contamination in the "PCB Areas Operable Unit (OU)" at the Crab Orchard National Wildlife Refuge. The proposed remedial action, described in the Proposed Plan issued by the Environmental Protection Agency (EPA) for public comment on April 5, 2006, would address three plumes of groundwater contaminated with trichloroethylene (TCE).

The proposed remedy for "Plume 2" would involve the use of a treatment technology known as electric resistive heating (ERH). Two electrical arrays would be installed in which electrodes would be inserted in a treatment zone that would range from eight feet below ground to a depth of 48 feet. The electrodes would then be used to heat the soil to sufficient temperatures to volatilize the TCE.

As you may know, the Service leases significant portions of the area to be addressed by the proposed remedial action to General Dynamics Ordnance and Tactical Systems (GD-OTS), which conducts a munitions manufacturing operation. In their comments on the Proposed Plan, GD-OTS identified potential human health and safety risks that GD-OTS believes would be posed by the use of ERH in the Plume 2 area.

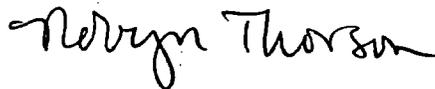
Specifically, GD-OTS indicated that it uses three warehouses in the Plume 2 area for the storage and warehousing of explosives and primers used in production of military ammunition and for warehousing of finished military ammunition. GD-OTS has indicated that the proximity of the ERH activity to these storage activities may pose safety hazards. GD-OTS has also expressed concerns that the use of ERH may pose the potential to detonate historic and undefined unexploded ordnance that may be located in and around the treatment area. GD-OTS has indicated that it may be possible to resolve these safety concerns but that further evaluation is required before it is known whether such resolution can be achieved.

As the agency with land management responsibility for the Refuge as well as landlord responsibilities to our tenants, the Service strongly believes that the safety concerns identified by GD-OTS should be fully evaluated and resolved prior to the selection of remedial action addressing groundwater contamination at the PCB OU. For this reason, the Service cannot

concur at this time with the remedy outlined in the Proposed Plan.

We look forward to working closely with EPA, Illinois EPA, and GD-OTS to resolve the safety concerns that have been identified so that a remedy that is protective of human health and the environment may be selected and implemented. If you would like to discuss this further, and initiate discussions with GD-OTS, please contact Frank J. Horvath, Chief, Damage Assessment and Response, Region 3, at 612-713-5336 or Dennis Pinigis, CERCLA Activities Coordinator, Crab Orchard National Wildlife Refuge, at 618-998-5912.

Sincerely,

A handwritten signature in black ink that reads "Robyn Thorson". The signature is written in a cursive, flowing style.

Robyn Thorson
Regional Director