

COMMUNITY INVOLVEMENT PLAN

WEDRON GROUNDWATER SITE

WEDRON, ILLINOIS

FEBRUARY 2014

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1. OVERVIEW OF THE COMMUNITY INVOLVEMENT PLAN

The United States Environmental Protection Agency developed this *Community Involvement Plan* in preparation for community involvement activities to be conducted during the investigation and cleanup at the Wedron Groundwater site in Wedron, Illinois. This document provides information about current community concerns and presents a plan to enhance communication between local residents and EPA as the investigation and cleanup at the site progresses.

(Words appearing in **bold** are defined in Appendix A.)

The objective of community involvement is to involve the public in activities and decisions related to the investigation and cleanup of contaminated sites. The community involvement program promotes two-way communication between members of the public and EPA. EPA has learned that its decision-making ability is enhanced by actively soliciting comments and information from the public. Public input can be useful in two ways:

- Communities provide valuable information on local history, resident involvement and site conditions.
- By expressing its concerns, the community assists EPA in developing a response that more effectively addresses the community's needs.

The information in this plan is based primarily on interviews with local officials and residents conducted during community interviews, performed by EPA April 3-5, 2013.

1.1 A BRIEF EXPLANATION OF SUPERFUND, EPA'S EMERGENCY RESPONSE AND REMOVAL PROGRAM

In 1980, the United States Congress enacted the **Comprehensive Environmental Response, Compensation, and Liability Act**, also called **Superfund**. CERCLA authorizes EPA to investigate and respond to hazardous substance releases that may endanger public health and the environment. Congress amended and reauthorized the Superfund law in October 1986 as the **Superfund Amendments and Reauthorization Act**. If the site poses an immediate threat to public health or the environment, EPA can intervene with an **emergency response action**.

In December 2011 staff from EPA's Superfund Emergency Response and Removal Program began overseeing the activities concerning the Wedron Groundwater site. The goal of EPA's Emergency Response and Removal Program is to protect the public and the environment from immediate threats posed by the contamination in the groundwater and in private drinking water wells.

At the Wedron Groundwater site, EPA is working with BP Products, Illinois Railway, Lockheed Martin Corp., Technisand, Inc., and Wedron Silica Co., as well as using some Superfund money, to conduct the investigation and cleanup.

2. SITE BACKGROUND

2.1 SITE DESCRIPTION

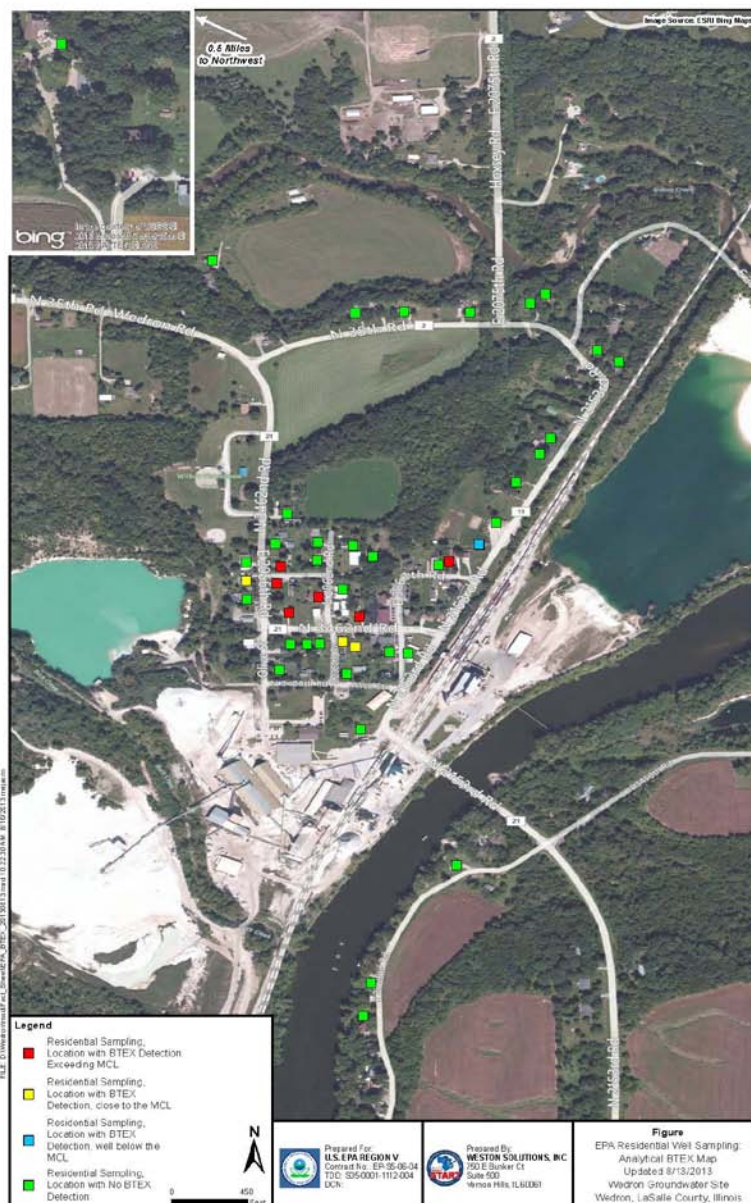
The site is the unincorporated community of Wedron located in LaSalle County, Ill. The site is located in a mixed rural, residential, and industrial area. North of the site are residential homes, agriculture, and undeveloped land. To the east are the railroad, Fox River, agriculture, and undeveloped land. To the south are the Wedron Silica Co. sand-mining facility and mining pits; and to the west are two Wedron Silica Co. quarries, agriculture, and undeveloped land. Current and former commercial and industrial businesses at the site include the former Hoxsey gas station, the former LaSalle County Farm Supply Co. operations, the former Wedron Dayton & Grain Supply Co. operations, the former Standard Oil of Indiana operations, Burlington Northern Santa Fe railroad company, the North American Railnet, Inc. railroad company, the Illinois Railway, Del Monte, Twentieth Century Fox, Lockheed Martin Corp., Wedron Silica Co. and Technisand, Inc.

2.2 SITE HISTORY

In April 1982, Illinois EPA began a groundwater investigation in Wedron after the Illinois Department of Public Health received complaints from several residents of gasoline-type odors in their private well water. Illinois EPA collected groundwater samples from several private wells in April 1982, June 1983 and August 1983 and confirmed the presence of chemicals typically found in gasoline. At that time, a new deeper well was drilled to provide clean drinking water to the affected homes. In addition, an investigation of several potential sources of contamination was completed, but no source was found.

In 2011, residents of Wedron reported gasoline odors from their water. As a result, Illinois EPA collected drinking water samples from private wells in October 2011 and found two homes with benzene levels above the health standard. Illinois EPA sent those results to the Illinois Department of Public Health. In November 2011, the LaSalle County Health Department told these residents to no longer drink or use their well water. Illinois EPA then contacted U.S. EPA, which began the current investigation.

Figure 1
Residential Well Sampling Map



The figure shows that some homes had wells where benzene was detected at levels exceeding the standards that are set by the EPA for drinking water quality. Those are shown in red. Yellow shows that benzene was detected close to the standard, but not in excess of it. Blue shows some detection, but at levels that are well below the standards. Green shows homes with wells with no detection. MCL stands for Maximum Contaminant Level, and it is the legal threshold limit on the amount of a substance that is allowed in public water systems under the Safe Drinking Water Act. BTEX stands for benzene, toluene, ethylbenzene, and xylenes, which are frequently found together at hazardous waste sites.

3. COMMUNITY PROFILE

The Wedron Groundwater site is located in Wedron, Dayton Township, LaSalle County, Illinois. LaSalle County's first European settlement was established on behalf of France by a French Explorer named Robert de la Salle in 1680. However, LaSalle gave the area the name of Louisiana in honor of King Louis XIV. LaSalle County was officially formed and renamed in 1831. It is the home to the first of the Lincoln-Douglas debates and the Boy Scouts.

According to the 2010 census, Wedron has a population of 155 with 155 people identifying themselves as white. There are 89 males and 66 females. The average age of the population is 44.7 years old. There are 58 households in the town and five businesses. Approximately 72 percent of the households are family households with 32.8 percent of the households having children under the age of 18.

According to the 2010 Census, Wedron has 63 total housing units with 58 occupied and 5 vacant. Of the occupied homes, 35 are owner occupied and 23 are renter-occupied.

3.1 CHRONOLOGY OF COMMUNITY INVOLVEMENT

September 2012 - EPA established a Web page for the site:

epa.gov/region5/cleanup/wedron

September 2012, EPA established a site information repository at the Reddick Public Library District in Ottawa and Dayton Township building.

September 2012 - EPA mailed out a site fact sheet to residents and officials on the site mailing list. The fact sheet updated the community on the status of the work being conducted at the site and announced a public open house for October 3, 2012.

October 3, 2012 - EPA held an open house to inform local officials and community members about the project. An advertisement was placed in the *Ottawa Times* newspaper announcing the open house.

November 2012 - EPA mailed out a postcard to residents and officials in the Wedron area to announce a public meeting for December 5, 2012.

December 5, 2012 - EPA held a public meeting to inform local officials and community members about the project. An advertisement was placed in the *Ottawa Times* newspaper announcing the public meeting.

January 2013 - EPA mailed out a postcard to residents and officials in the Wedron area to announce a public meeting for February 6, 2013.

February 6, 2013 - EPA held an open house to inform local officials and community members about the project. An advertisement was placed in the *Ottawa Times* newspaper announcing the public meeting.

March 2013 - EPA mailed out a flyer to residents and officials in the Wedron area to announce a public meeting for April 3, 2013.

April 3, 2013 - EPA held a public meeting to inform local officials and community members about the project.



Steve Faryan, EPA On Scene Coordinator (in the photo on the left) and Heriberto León, EPA Community Involvement Coordinator (in the photo on the right) speak at the public meeting held on April 3, 2013.



EPA assembled a panel of experts to speak to residents at the April 3, 2013 meeting.

From April 3 – 5, 2013, EPA conducted community interviews with area residents and officials to use in developing this CIP.

June 2013 – EPA mailed out a site fact sheet to residents and officials on the site mailing list. The fact sheet updated the community on the status of the work being conducted at the site.

June 5, 2013 – EPA held an open house and public meeting to update local officials and community members about the project. A flyer was mailed out announcing the meeting.

September 18, 2013, EPA held a public meeting to update local officials and community members about the project. A flyer was mailed out announcing the meeting.

EPA staff has maintained direct contact with public officials and their representatives to update them about how EPA is addressing the contamination and community concerns.

Local newspapers and radio stations have featured stories about the site, including comments provided by OSC Steve Faryan. The stories have also notified the public of the time, date and location of public meetings.

3.3. KEY COMMUNITY COMMENTS AND CONCERNS

From April 3-5, 2013 and throughout the spring of 2013, EPA representatives met one-on-one with Wedron and LaSalle County residents and officials to discuss community issues and concerns regarding the contamination associated with the Wedron Groundwater site. From these interviews, EPA developed this CIP.

The following is a summary of the comments and major areas of concern raised during those interviews.

3.3.1 Human Health

The biggest concern raised by everyone interviewed was the potential human health risks posed by: drinking contaminated water from contaminated wells; inhaling vapors from contaminated well water while bathing or washing dishes, etc.; or through vapor intrusion. People talked about people that lived or worked in Wedron contracting: Leukemia; kidney and other cancers; Lupus; blood disorders; and skin rashes (that clear up when they leave town). Several people talked about otherwise healthy people getting sick. People said that they want to know how the contamination affects health. Several families talked about their particular concern for their children and grandchildren saying that they were concerned about how much contamination the children may have already been exposed to and what the long-term health effects might be. People stated that they were concerned about people getting sick from vapor intrusion if it is found to be occurring. They expressed concern that they may have already been breathing contaminated vapors since the contamination in the wells was discovered years ago, but the potential for vapor intrusion is only being studied now. Some interviewees asked if people would be tested for potential health problems from the contamination.

3.3.2 Property Values

Another big concern expressed by everyone interviewed was the “plummeting” property values in Wedron. Everyone talked about how, due to the contamination, the value of property in Wedron is currently “zero.” They said banks would not loan money for home equity loans in Wedron, nor would banks loan money for a mortgage for a home in Wedron. People talked about how they were all “paying for mortgages on homes that were worth nothing” and “paying for insurance on homes that may not really be covered by that insurance.” One person stated that he was told the banks would not even take the homes back. Another person who had paid off his home talked about how he had worked for years to pay off his mortgage and now “has nothing to show for it.” Another individual stated that in “one fell swoop, my fate was sealed,” saying that he was

now stuck in Wedron since he is unable to sell his home. People explained that the county had lowered their property assessments—thus lowering their tax burden—in an effort to make up for the loss in value, but some people said that they were not happy about this. Those individuals said the county should have consulted the homeowners first and that lowering taxes hurt some community services they were happy to pay for. They further stated that lowering the assessed value of the homes results in an actual decrease of their value in the market place. People asked if EPA had evidence from other sites where property values went up after the site is cleaned. A few people stated they would be willing to be “bought out,” but others said they did not want to sell their home – they just wanted a clean water source and the contamination to be cleaned up. A couple of people said they thought there was an outside entity pushing to lower property values in order to buy out the town at a discount.

3.3.3 Increased Stress

Virtually everyone interviewed said that the contamination has caused them a lot of increased stress. One person interviewed said that she worries “constantly” and that she “cannot even have a life because she is so worried about what happened in the past.” Another person said “not a day goes by that I don’t think of this.” Still another resident said the situation is “mentally and emotionally stressful.” Finally, another resident said “I have an overwhelming sense of hopelessness.” People said that the stress is a result of the fear of potential health effects from the contamination as well as the financial strain of the loss of property values, the feeling of being “trapped,” and the anxiety of waiting for a “final” resolution. A few people also said that someone from Erin Brockovich’s firm made statements that scared them, adding to their stress.

3.3.4 Test Results Turnaround Time

Everyone interviewed that had their well tested said that it took too long for them to get their test results. Some said that they did get a verbal result saying if their well was “ok,” but many did not receive their written results for nine months to a year. One person said that she had “no faith” in her test results because it was nearly a year since the sample was taken. Her comment is representative of what others stated. Everyone requested that the results be given to them much sooner in the future.

3.3.5 Lack of Trust

During the community interviews, EPA staff became aware of trust issues in the community. The first issue of trust was between people who work(ed) at Wedron Silica versus those who do not work at the facility. Several people stated that they thought the people who either currently work or previously worked at Wedron Silica know more than they are saying. The second is between those who are in a position of authority versus those who are not. A couple of people stated that they thought some leaders in the community are also not as forthcoming as they could be. One person said “there is a lot of bad blood.” Finally, there is also a lack of trust of EPA. A couple of people said that they do not feel they are getting the truth from EPA. Another person interviewed said that he would like to know more detail about what EPA is doing. He said, “I would love to trust, but...”

3.3.6 Confusion about EPA's Authority

Virtually everyone expressed confusion about what EPA can or cannot do to fix the problem. Although people were appreciative that the EPA lawyer came to the most recent public meeting to explain the legal issues surrounding EPA's authority at the site, community interviews revealed that there was still confusion about this issue. This confusion is primarily due to the fact that because the contaminant is from gasoline, it is excluded from being addressed under the Superfund law (CERCLA). They made statements like: "It is confusing." "What difference does it make?" "It is still a pollutant!" "How can gasoline be singled out as something you cannot address." Because of this confusion, members of the community requested that the EPA keep them informed about how the various environmental laws will make it possible for the EPA to address the contamination in their well water.

3.3.7 Cost

Many people interviewed expressed concern regarding who would pay for the investigation, cleanup, and a permanent solution for a clean water supply for the people affected by the contamination. Many people said they are concerned that the community in Wedron will eventually just be left without a permanent solution if EPA cannot come up with the money to pay for it.

Another cost issue that was raised is regarding the cost of replacing the water filters in the homes where the filters had been installed. Those people said that they did not have \$4,000 a year to replace the filters. Cost was also a concern expressed by many people when discussing a potential permanent solution. Many people said that they did not want to pay monthly water bills if they were hooked up to Ottawa's water. They were also concerned that they would have to pay higher taxes if they were connected to Ottawa's water system.

3.3.8 Length of Time

Many people questioned said they were concerned about how long will it take for a permanent solution to be implemented. They said that it had already been 30 years since the problem was first identified, so questioned how much longer it would take. One group of people interviewed said that they were concerned that "it would drag out a long time." This statement is representative of what many others interviewed said.

People also expressed concern regarding how long their well would be tested and how long they will be provided bottled water. Several people expressed concern that their well would become contaminated after EPA stops testing and either they will not even know and/or they will have no way to fix it.

3.3.9 Conflicting Messages

Virtually everyone interviewed expressed confusion and frustration regarding conflicting messages they are hearing from EPA and Erin Brockovich's firm. Many people said that they do not know who or what to believe. According to those interviewed, EPA's lack of rebuttal to the statement(s) made by Erin Brockovich's firm lead the community to believe that EPA agreed. These

individuals said that if EPA did not agree, the Agency needed to make that clear. Nonetheless, residents stated that they are still not sure who is right.

3.3.10 Public Meeting Frustration

Many people interviewed expressed frustration that people who do not live in Wedron have been very vocal at the meetings. The interviewees said they felt like the meetings were being “hijacked by outsiders.” While most people interviewed said they understand other people are concerned about the contamination, those most affected said they felt they did not get the time they needed to ask their questions. Most said they found the format for the April 3, 2013 meeting the best format. (On April 3, 2013 EPA staff briefed owners with affected wells prior to the general public meeting.)

3.3.11 Permanent Solution

Everyone interviewed stated that they would like to see a permanent solution to the contamination. They said that they did not want to be going through this all over again in the future.

3.3.12 Contamination Found in the 1980s

Virtually everyone interviewed expressed frustration that the contamination was not cleaned up when it was first discovered in the 1980s. They said that if it had been cleaned up then, they would not be in the situation that they are in today.

3.3.13 Source of Contamination

Many people interviewed talked about where they thought the contamination might be coming from. There was no consensus on this. Some said they thought it came from Wedron Silica Co., others thought it was the railroad spill(s). Still others thought it was a combination of several sources including an old junk yard and pipelines in the area.

3.3.14 EPA Response

Several people interviewed stated that, at first, they did not feel EPA was responding as quickly as they would have liked. Several people also stated that some EPA staff had been difficult to get a hold of. One person said that he felt he had been “brushed off” by EPA.

3.3.15 Relationship with Wedron Silica Co.

Several people interviewed expressed concern that all of the negative talk, publicity and talk of a lawsuit against Wedron Silica Co. will have a detrimental effect on the current relationship the community has with the company. They stated that Wedron Silica Co. had been a “good neighbor” and that the community “needs them on our side.” They were worried that a lawsuit in particular would cause Wedron Silica Co. to “back off” from cooperating with the current investigation. Another couple said that they “would like to maintain a relationship with Wedron Silica Co., but cannot let them contaminate our home.”

3.3.16 Effect of Dynamiting and Increased Mining

A couple of people questioned whether dynamiting at Wedron Silica Co. could affect the contamination. A couple of other people said they were worried that increased mining at Wedron Silica Co. would add to the contamination. They said that mining had increased due to the need for sand for fracking.

3.3.17 Sand Issues

Many people interviewed expressed concern and frustration with sand blowing throughout Wedron. They said that they were concerned about the health effects from breathing the sand as well as the nuisance and mess caused by the sand. A couple of people said that they thought a resin was put on the sand and they were concerned about what the resin was made of, how that might affect people's health, or that it might be adding to the contamination. One resident talked about how "the sand is all over." He further said that he cannot leave his windows open and that the sand tracks into the house and scratches the sheen off of hard floor surfaces. This resident said that sand is not his main concern, but silica is. Another person talked about "sand blowing constantly" and that on windy days he said it was impossible to sit outside on his deck or dock and fish along the river. Finally, several people stated that before EPA comes into town, the sand is covered up with what they believe is "clean" sand. These individuals said that they think someone is trying to cover up what is normally there.

One person also said that when Wedron Silica dynamites the mine, diesel fuel is used, which then contaminates the sand. This individual stated that Wedron Silica Co. then washes and recycles the sand. Another individual said that the diesel is burned off.

3.3.18 Noise

A couple of people interviewed stated that noise and vibration from the railcars, which come through after midnight wake them up. They described a banging-type noise, as if someone was walking along the tracks banging each of the cars, and that the vibration shakes their house. They said that pictures and other items atop shelves would shake and move around.

3.3.19 Fox River/Buck Creek

A couple of people interviewed reported some sort of pipe discharging into the Fox River. They described the pipe as having a little brick house around it, and liquid discharging out of it into the Fox River. They said that they attributed the pipe to Wedron Silica Co. This couple also stated that they thought that Buck Creek had been contaminated by Wedron Silica Co. They said that years ago that Buck Creek was clear and "you could see fish," and that now it is dirty with no fish, and at times is "bright green."

3.3.20 Questions Asked

During the community interviews, the following questions were raised:

- Why wasn't the contamination investigated and cleaned up in the 1980s?

Filter questions

- For filters, what level is allowed before it needs to be changed?
- Are the filters really working? (The Brockovich firm says the filters do not capture the degreasers.)
- EPA says the filters are working, the Brockovich firm says they don't. Who do we believe?
- Can I have my own filter tested at a lab that I select to compare the results?
- How do the carbon filters work?

Well sampling questions

- How soon can I get sampled again?
- How often can we get sampling?
- Can we get regular sampling?
- How long will EPA sample? Can EPA at least keep sampling once a year?
- Does the contamination happen gradually or all at once?
- Residents said that they want their test results sooner (the actual reports).

Funding questions

- Who is going to pay for the remedy?
- If not Superfund, what are the other funding/enforcement possibilities?
- Could the LUST fund cover something? (Explain the LUST fund.)

Vapor intrusion questions

- What happens if there is vapor in my home? (Explain the whole process – specific to Wedron.)
- Is vapor intrusion sampling going to be offered to everyone in Wedron, or just a few homes?
- Why would EPA do all of this work if the homes will not be habitable due to vapors?

Investigation questions

- How long do you expect the investigation to take?
- What is the timeline for upcoming work?
- Has the Fox River been sampled?
- If not, why not?
- Why has Erin Brockovich's firm been able to identify so quickly and EPA has not?
- Can you tell if it is an old spill or a new spill? (People talked about the smell being fresh and said if it was from an old spill, it would smell stale.)
- If the contamination is only from the 1950s, wouldn't the levels be getting lower? (The residents said that the levels actually seem to be increasing.)

Pit 3

- Can kids swim in the pit 3?
- Why hasn't pit 3 been sampled?
- Was pit 3 around in 1956?

Ground water flow questions

- In what direction is the contamination moving? (People asked if they could get groundwater flow maps and more hydrogeologic information. People are confused about which direction the contamination is going.)
- How fast does the contamination move?

Cleanup questions

- Can EPA clean up the source of the contamination? The soil? And, the ground water?
- What happens down the road? What if you fix everyone that is affected now, but my well becomes contaminated later? Will I even know? Because, will you still be testing? And, if I find out it becomes contaminated, will EPA be there to help me then? Can I get in on a fix now just in case?
- Why can't EPA install wells outside the plume now while EPA is here and then have the wells ready to go when they are needed?
- If we put in deeper wells, would EPA still clean up the soil?
- How will the ultimate solution be determined?
- How much contamination can EPA really get out?
- What are the cleanup options and the options for permanent water source?
- What is the best cleanup solution?
- Are we going to have to sue EPA to get something done?

Health questions

- Is ATSDR providing physicals?
- What are the health effects from the contamination?
- Can we eat food from our gardens?

Wedron Silica Co.-specific questions

- Could Wedron Silica Co.'s dynamiting affect the contamination?
- What about all of Wedron Silica Co.'s violations?
- We heard that there was a lot of dirt hauled out of Wedron Silica Co. Where did it go?

General questions

- How long will it take for the county to lift its ban on well drilling?
- A few people talked about a "list" the banks have that would mean they would not get loans, etc. – Can we address this somehow?
- How long will people get bottled water?
- Is it safe to play in the park? (People said there was backfilling at the park.)
- Can something be done about the sand blowing?
- How far down do well casings go?
- A local well driller questioned if he can work on the wells or will he be held liable if something happens and they become contaminated?
- What was done to clean up the railroad spills?

3.3.21 Information Requested

The following information was requested during community interviews:

- Explain how the public library in Ottawa works. Explain that Wedron residents can go in and look at the EPA files, but that they just cannot check out files. Explain that EPA files cannot be taken out anyway.
- Make sure to keep officials up to date so they can address their constituent concerns. Officials wanted to know what the well-testing results are.
- Explain the plan for the future.
- People said they wanted to hear some success stories about communities that have come back after the contamination has been cleaned up.
- People requested information on health effects.
- Explain Superfund and what can and cannot be done under the law.
- People want more information on the legal issues. They said the last meeting was good, but EPA should keep that information coming.
- People were a little confused and want more information about the gasoline/funding/legal issue. They made statements like: “It is confusing.” “What difference does it make?” “It is still a pollutant!” “How can gasoline be singled out as something you cannot address.”
- People want to know more about what is going on between EPA and the parties considered potentially responsible for the contamination, or **PRPs**. Explain what companies you are investigating as being PRPs. People said they want to know more about what is going on with that part of the investigation and what the current status is. They said they were happy with the attorney’s (Jacqueline Clark’s) update, but want to keep getting more information about the investigations.
- Make it clear in the fact sheet that EPA oversees all sampling.

4. HIGHLIGHTS OF THE COMMUNITY INVOLVEMENT PROGRAM

Community involvement objectives and activities have been developed to encourage public participation during upcoming activities at the site. They are intended to ensure that residents and interested officials are informed about activities taking place at the Wedron Groundwater site and, at appropriate times, have opportunities to provide input during the investigation and cleanup process. To be effective, the community involvement program must be formulated according to the community's need for information, and its interest and willingness to participate in the process.

The following objectives have been developed as a guideline for the implementation of community involvement activities.

4.1 ENLIST THE SUPPORT AND PARTICIPATION OF LOCAL OFFICIALS AND COMMUNITY LEADERS

Local officials and community leaders provide an invaluable resource in EPA's effort to understand and monitor community concerns. Local officials' and community leaders' frequent contact with residents provides direct lines of communication in which questions and concerns may be addressed or referred to EPA. It is essential that local officials be informed of site activities, plans, findings, and developments. The appropriate officials and community leaders that are to be kept informed and involved include individuals listed in Appendix C of this CIP.

4.2 IDENTIFY AND ASSESS RESIDENT PERCEPTION OF THE SITE

Information regarding resident concern and perception of the site is indispensable. As of the publication of this document, the primary concerns are: human health, property values, test results taking too long, lack of trust, confusion about EPA's authority, cost, and conflicting messages. Understanding these concerns will help EPA focus the level of effort for community involvement at the site. Background information and the direction of local concern will determine those activities that best meet the community's needs.

4.3 PROVIDE FOLLOW-UP EXPLANATIONS ABOUT TECHNICAL ACTIVITIES AND CONTAMINANTS

Concise, easily understood and timely information should be available to area residents concerning the schedule of technical activities, their purpose, and their outcome. A written, basic description and discussion of contaminants like benzene as well as vapor intrusion should be provided so that residents understand possible threats to the public. The community involvement staff should also attempt to identify special situations or concerns where more specialized information is desired by individuals or groups. Finally, to ensure that

inquiries from the community are handled efficiently and consistently, EPA should continue to maintain a single point of contact.

4.4 INFORM THE COMMUNITY ABOUT THE PROCEDURES, POLICIES AND REQUIREMENTS OF THE EPA EMERGENCY RESPONSE AND REMOVAL PROGRAM

Many individuals interviewed regarding the Wedron Groundwater site did not fully understand EPA's Emergency Response and Removal program. To dispel possible confusion about EPA's purpose and responsibilities at the site, an effort should be made to circulate basic information to the community describing the process. EPA terms, abbreviations and acronyms, policies and procedures should also be explained as site activities progress.

As the cleanup process progresses, it will also be worthwhile to evaluate the effectiveness of the community involvement activities in providing information to residents and encouraging resident participation.

5. COMMUNITY INVOLVEMENT TECHNIQUES

U.S. laws and EPA policy require that certain community involvement activities be conducted at designated milestones during the investigation and cleanup process. In addition, EPA Region 5 undertakes other activities to strengthen its communication with those affected by the contamination. A member of the EPA Region 5 community involvement staff has been designated to respond directly to media and public inquiries regarding site activities. Activities that will be conducted during the cleanup of the contamination are described below.

5.1 MAINTAIN CONTACT WITH LOCAL OFFICIALS, COMMUNITY LEADERS AND RESIDENTS

The process of community interviews has already established an initial communications link between the community and EPA. Furthermore, the community involvement coordinator for the site has been designated by EPA as a contact person (See Appendix C – EPA Representatives). Access to a contact person reduces the frustration that may accompany attempts to obtain information and communicate with the several agencies and organizations involved in the cleanup. The community involvement coordinator will continue to maintain contact with the appropriate local officials, community leaders and residents to provide them information on issues that may arise during the investigation and cleanup at the site.

5.2 PROVIDE SITE AND EPA EMERGENCY RESPONSE AND REMOVAL PROGRAM INFORMATION ON THE INTERNET

While it is not clear exactly how many people in Wedron have convenient access to the Internet, EPA will put site documents on the EPA Web site.

Information on EPA's Emergency Response and Removal Program and the site will be provided on the following EPA Web site:

www.epa.gov/region5/cleanup/wedron

5.3 MAINTAIN AN INFORMATION REPOSITORY

EPA policy requires the establishment of an information repository for any site where EPA cleanup activities are being conducted. An information repository is a designated location (usually a library or other public building), which houses a file of site-specific documents and general information about EPA programs. A site file found in an information repository typically includes legal documents, work plans, technical reports, and copies of laws that are applicable and relevant to activities at the site. Establishment of an information repository makes the site-related information more accessible to the public. EPA has established two repositories for the Wedron Groundwater site. Their locations are listed in Appendix B of this CIP. Many documents, plans and other finalized written materials generated during the investigation and cleanup have been and will continue to be placed in the repositories. EPA will notify community groups, local officials, and interested residents on the mailing list of their locations. Please note that many people in Wedron said they did not think they were

allowed to use the library in Ottawa. EPA should explain that anyone is allowed to use the library to look at the site file.

5.4 COORDINATE WITH THE OFFICE OF PUBLIC AFFAIRS ON NEWS RELEASES AND MEDIA INQUIRIES

Prepared statements will be released to local newspapers, radio and television stations to announce any significant findings at the site during the investigation and cleanup and to notify the community of public meetings. Media interviews of EPA staff are coordinated through the Office of Public Affairs. Additional news releases are advisable at the completion of the cleanup. The Community Involvement Section will coordinate with the Office of Public Affairs on the writing and distribution of news releases to the news media in Appendix C and other appropriate news media. News releases will be included in the site file at the information repositories and posted on the EPA Region 5 Web page at:

<http://www.epa.gov/region5/newsevents/index.html>.

5.5 PREPARE AND DISTRIBUTE FACT SHEETS OR UPDATE REPORTS

Fact sheets and update reports, written in non-technical language, will be produced to coincide with particular milestones during the investigation and cleanup process. The fact sheets and update reports are intended to provide the community with detailed information about the site. In addition, other fact sheets or update reports may be developed to respond to specific community information needs. These fact sheets and update reports will be placed in the information repositories and sent to all parties on the mailing list. Residents and officials stated that mailings were helpful in getting the information out to the community.

Information may also be placed on EPA Region 5's Web page at:

www.epa.gov/region5/cleanup/wedron.

5.6 HOLD PUBLIC MEETINGS AND HEARINGS

A public meeting provides an opportunity for EPA to present specific information and a proposed course of action. EPA staff is available to provide information and answer questions. A public meeting is not a formal public hearing where testimony is received. Instead it might be a meeting to exchange information or comments. Public meetings provide community members with an opportunity to express their concerns to and ask questions of the EPA, state, or local government officials. In addition, EPA holds informal open-house style meetings where residents can meet EPA experts one-on-one to discuss the activities at the site. Public meetings or informal open houses may be held at various times throughout the investigation and cleanup process. Scheduling meetings should remain flexible to account for technical milestones and public interest.

A public hearing is a formal meeting wherein EPA officials hear the public's views and concerns about an EPA action or proposal. There are specific regulations about when EPA is required to consider such comments when evaluating its actions. Public hearings are recorded by a professional transcriber and become part of the administrative record. The comments also are posted to the Web. Most people interviewed stated that the format that they thought worked best was a combination of a public meeting and an open house with a formal presentation followed by "break out" sessions where individuals can speak one-on-one with EPA representatives.

5.7 PUBLISH NOTICES OR NEWSPAPER ADVERTISEMENTS

A public notice may be placed if significant findings are made during the investigation and cleanup at the site or upon completion of the cleanup. Notices or newspaper advertisements also may be published to announce public meetings and hearings conducted by EPA.

5.8 WORK WITH A COMMUNITY ADVISORY GROUP ON TECHNICAL ISSUES

If the community forms a Community Advisory Group, EPA may work with or provide assistance to the CAG, on technical issues. This can provide a way for the community to provide input on site technical issues and become more involved in the decision-making process. It can also provide a way for EPA to explain, in greater detail, the site technical information. Furthermore, involvement with a CAG can provide a forum for EPA and the various members of the group to discuss their concerns and learn from each other.

5.8 PROVIDE HEALTH INFORMATION ABOUT EXPOSURE TO CONTAMINANTS

The Agency for Toxic Substances and Disease Registry has been working closely with the EPA during the groundwater investigation in Wedron to assess the potential public health impact of exposure to the contaminants found in the water and soil. ATSDR is currently drafting a Health Consultation, which will provide health information about exposure to benzene and other contaminants and provide recommendations for actions to protect the public's health. As part of this process, ATSDR is doing the following:

- Evaluating the concentrations of benzene and other contaminants that EPA is measuring in the water and soil
- Evaluating the potential health impacts of how the public is being exposed (through "exposure pathways" such as drinking water, eating foods grown in the soil, or inhaling gases or vapors)
- Evaluating health information about the community from various sources (such as health records, cancer registry data, and information from the state and county health department)
- Understanding and addressing community health concerns

To talk with someone at ATSDR about your health concerns, please call 312-886-0840.

6. COMMUNITY INVOLVEMENT ACTIVITY TIMEFRAME

Figure 2
Timeframe for Community Involvement Activities

| Community Involvement Activities | Timeframe |
|--|-----------|
| 1. Maintain contact with local officials, community leaders and residents | Ongoing |
| 2. Provide site and Superfund information on the Internet | Ongoing |
| 3. Maintain information repositories | Ongoing |
| 4. Coordinate with the office of public affairs on news releases and media inquiries | As needed |
| 5. Prepare and distribute fact sheets or update reports | As needed |
| 6. Hold public meetings and hearings | As needed |
| 7. Public notices or newspaper advertisements | As needed |
| 8. Work with the CAG on technical issues | As needed |
| 9. Provide health information about exposure to contaminants | Ongoing |

APPENDIX A

GLOSSARY

Benzene

Benzene is a colorless liquid with a sweet odor. It evaporates into the air very quickly and dissolves slightly in water. It is highly flammable and is formed from both natural processes and human activities. Benzene is widely used in the United States; it ranks in the top 20 chemicals for production volume. Some industries use benzene to make other chemicals which are used to make plastics, resins, and nylon and other synthetic fibers. Benzene is also used to make some types of rubbers, lubricants, dyes, detergents, drugs, and pesticides.

Breathing very high levels of benzene can result in death, while high levels can cause drowsiness, dizziness, rapid heart rate, headaches, tremors, confusion, and unconsciousness. Eating or drinking foods containing high levels of benzene can cause vomiting, irritation of the stomach, dizziness, sleepiness, convulsions, rapid heart rate, and death. The major effect of benzene from long-term exposure is on the blood. Benzene causes harmful effects on the bone marrow and can cause a decrease in red blood cells leading to anemia. It can also cause excessive bleeding and can affect the immune system, increasing the chance for infection. Long-term exposure to high levels of benzene in the air can cause leukemia, particularly acute myelogenous leukemia, often referred to as AML. According to EPA, the Department of Health and Human Services and the International Agency for Research on Cancer, benzene is known to cause cancer in humans.

More information on benzene can be found on the following website:

www.atsdr.cdc.gov/tfacts3.pdf

Community Advisory Group

A Superfund community advisory group or CAG is a way for people in the community to participate in providing coordinated, local input to the decision-making process at Superfund sites. It is a forum for community members to present and discuss their needs and concerns related to Superfund cleanup projects. A CAG assists U.S. Environmental Protection Agency in making better decisions by providing the Agency a unique opportunity to hear and seriously consider community preferences for site cleanups.

Community Involvement Plan

A Community Involvement Plan, or CIP, outlines specific community involvement activities that occur during the investigation and cleanup at the site. The CIP outlines how EPA will keep the public informed of work at the site and the ways in which residents can review and comment on decisions that may affect the final actions at the site. The document is available in the site's information repository maintained by EPA. The CIP may be modified as necessary to respond to changes in community concerns, information needs and activities.

Clean Air Act

The Clean Air Act is the comprehensive federal law that regulates air emissions from stationary and mobile sources. Among other things, this law authorizes EPA to establish National Ambient Air Quality Standards to protect public health and public welfare and to regulate emissions of hazardous air pollutants.

One of the goals of the Act was to set and achieve NAAQS in every state by 1975 in order to address the public health and welfare risks posed by certain widespread air pollutants. The setting of these pollutant standards was coupled with directing the states to develop state implementation plans, applicable to appropriate industrial sources in the state, in order to achieve these standards. The Act was amended in 1977 and 1990 primarily to set new goals (dates) for achieving attainment of NAAQS since many areas of the country had failed to meet the deadlines.

Section 112 of the Clean Air Act addresses emissions of hazardous air pollutants. Prior to 1990, CAA established a risk-based program under which only a few standards were developed. The 1990 Clean Air Act Amendments revised Section 112 to first require issuance of technology-based standards for major sources and certain area sources. "Major sources" are defined as a stationary source or group of stationary sources that emit or have the potential to emit 10 tons per year or more of a hazardous air pollutant or 25 tons per year or more of a combination of hazardous air pollutants. An "area source" is any stationary source that is not a major source.

For major sources, Section 112 requires that EPA establish emission standards that require the maximum degree of reduction in emissions of hazardous air pollutants. These emission standards are commonly referred to as "maximum achievable control technology" or "MACT" standards. Eight years after the technology-based MACT standards are issued for a source category, EPA is required to review those standards to determine whether any residual risk exists for that source category and, if necessary, revise the standards to address such risk.

Comprehensive Environmental Response, Compensation, and Liability Act

A federal law passed in 1980 and modified in 1986 by the Superfund Amendments and Reauthorization Act. Under the program, EPA can either:

- Pay for site cleanup when parties responsible for the contamination cannot be located or are unwilling or unable to do the work; or
- Take legal action to force parties responsible for site contamination to clean up the site or pay back the federal government for the cost of the cleanup.

Emergency Response Action

If a site poses an immediate threat to public health or the environment, an emergency response action will be taken immediately to stop the threat.

National Contingency Plan

The National Oil and Hazardous Substances Pollution Contingency Plan, more commonly called the National Contingency Plan or NCP, is the federal government's blueprint for responding to oil spills and hazardous substance releases. The NCP was developed and published in 1968 in response to a massive oil spill. This plan provided the first comprehensive system of accident reporting, spill containment and cleanup, and established a response headquarters, a national reaction team and regional reaction teams.

Congress has broadened the scope of the NCP over the years. As required by the Clean Water Act of 1972, the NCP was revised the following year to include a framework for responding to hazardous substance spills as well as oil discharges. Following the passage of the Superfund law in 1980, the NCP was broadened to cover releases at hazardous waste sites requiring emergency removal actions. Over the years, additional revisions have been made to the NCP to keep pace with additional legislation. The latest revisions to the NCP were implemented in 1994 to reflect the oil spill provisions of the Oil Pollution Act of 1990.

It is in accordance with the NCP that EPA is required to conduct community interviews and develop a community involvement plan.

Potentially Responsible Party

A potentially responsible party, or PRP, is any individual or company potentially responsible for, or contributing to, contamination at a Superfund site.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act was enacted in 1976 to address the nation's huge volumes of municipal and industrial solid waste being generated. RCRA provides EPA with broad and effective enforcement tools that can be used to address conditions that may pose an imminent and substantial threat to human health or the environment. It allows EPA to address situations where the handling, storage, treatment, transportation or disposal of any solid or hazardous waste may present such a danger. In these situations, EPA can take legal action against any person who has contributed, or is contributing to, such handling, storage, treatment, transportation or disposal to require the person to stop those activities or to take any necessary action.

Safe Drinking Water Act

The Safe Drinking Water Act was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply. The law was amended in 1986 and 1996 and requires many actions to protect drinking water and its sources: rivers, lakes, reservoirs, springs, and ground water wells. (SDWA does not regulate private wells which serve fewer than 25 individuals.) SDWA authorizes the EPA to set national health-based standards for drinking water to protect against both naturally-occurring and man-made contaminants that may be found in drinking water. EPA, states, and water systems then work together to make sure that these standards are met.

Originally, SDWA focused primarily on treatment as the means of providing safe drinking water at the tap. The 1996 amendments greatly enhanced the existing

law by recognizing source water protection, operator training, funding for water system improvements, and public information as important components of safe drinking water. This approach ensures the quality of drinking water by protecting it from source to tap.

Superfund

Superfund is the commonly used term for the Comprehensive Environmental Response, Compensation and Liability Act (see Page A-1).

Superfund Amendments and Reauthorization Act

The Superfund Amendments and Reauthorization Act, or SARA, made modifications to the Comprehensive Environmental Response, Compensation and Liability Act, enacted on October 17, 1986.

APPENDIX B

INFORMATION REPOSITORIES AND PUBLIC MEETING FACILITIES

B.1 INFORMATION REPOSITORIES

The information repositories for the Wedron Groundwater site will be available for public review at the following locations:

Reddick Public Library District

1010 Canal St.
Ottawa, IL 61350

815-434-0509 - Kathy Clair, Library Director

Hours:

| | |
|--------------------|------------------|
| Monday – Thursday: | 9 a.m. – 9 p.m. |
| Friday & Saturday: | 9 a.m. – 5 p.m. |
| Sunday: | 12 noon – 5 p.m. |

Dayton Township Hall

3312 E. 18th Road
Ottawa, IL 61350

815-433-0855 - Phyllis Donahue, Supervisor

An additional site file can also be reviewed at EPA offices in Chicago:

EPA Region 5

Documents Management Section
77 W. Jackson Blvd.
Chicago, IL 60604

312-886-6541 (Call for an appointment)

B.2 PUBLIC MEETING FACILITIES

Dayton Township Hall

3312 E. 18th Road
Ottawa, IL 61350

Capacity: 52 people
Contact: Phyllis Donahue, Supervisor 815-433-0855
Cost: No charge

Serena High School

2283 N. 3812th Road
Serena, IL

Capacity: 200+ people (old gym)
Contact: Pat Leonard, Principal 815-496-2361
pleonard@unit2.net
Dan Joyce, Superintendent 815- 496-2850
djoyce@unit2.net
Cost: No charge

APPENDIX C

LIST OF CONTACTS (as of February 2013)

C.1 FEDERAL ELECTED OFFICIALS

Senator Richard Durbin
711 Hart Senate Office Building
Washington, D.C. 20510

Fax: 202-224-2152
202-228-0400
Web: www.durbin.senate.gov/public/index.cfm/footer-contact?p=contact

District Office

230 S. Dearborn St., Suite 3892
Chicago, IL 60604

Fax: 312-353-4952
312-353-0150

Senator Mark Kirk
524 Hart Senate Office Building
Washington, D.C. 20510

Fax: 202-224-2854
202-228-4611
Web: www.kirk.senate.gov/?p=contact

District Office

230 S. Dearborn St., Suite 3900
Chicago, IL 60604

Fax: 312-886-3506
312-886-2117

Representative Adam Kinzinger
1221 Longworth House Office Building
Washington, D.C. 20515

Fax: 202-225-3635
202-225-3521
Web: kinzingerforms.house.gov/email-adam

District Office

628 Columbus St., Suite 507
Ottawa, IL 61350

Fax: 815-431-9271
815-431-9383

C.2 STATE ELECTED OFFICIALS

Governor Pat Quinn
James R. Thompson Center
100 W. Randolph, 16-100
Chicago, IL 60601

Fax: 312-814-2121
312-815-5512
Web: www2.illinois.gov/gov/Pages/ContacttheGovernor.aspx

Senator Sue Rezin
309I Capitol Building
Springfield, IL 62706

Fax: 217-782-3840
217-782-0116
E-mail: senatorrezin@gmail.com

District Office

103 Fifth St.
Peru, IL 61301

Fax: 815-220-8720
815-220-8721

Representative Frank Mautino
300 Capitol Building
Springfield, IL 62706

Fax: 217-782-0140
217-557-7680
E-mail: patti76th@ivnet.com

District Office

221 E. St. Paul St.
Spring Valley, IL 61362

Fax: 815-664-2717
815-663-1629

C.3 LASALLE COUNTY OFFICIALS

JoAnn Carretto
Clerk
707 E. Etna Road
Ottawa, IL 61350

815-434-8202
Fax: 815-434-8319
E-mail: countyclerk@lasallegcounty.org

Board Members:

| | |
|-----------------------|--------------------|
| Jerry Hicks, Chairman | Jim Olson |
| Steve Abel | Joe Oscepinski Jr. |
| Jill Bernal | Cathy Owens |
| Sandi Billard | Joe Panzica Jr. |
| Russell Boe | Walter Roach Jr. |
| Chuck Borchsenius | Joseph Savitch |
| Larry Butkus | Mike Sheridan |
| Lou Anne Carretto | Gary Small |
| Brian Dose | Steve Tuftie |
| Allen E. Erbrederis | David Van Duzer |
| Randy Freeman | Tom Walsh |
| Robert Jakupcak | Elmer Walter |
| Mike Kasap | David Zielke |
| Joanne McNally | Arratta Znaniecki |

Ted Pumo
Environmental Health Division
La Salle County Health Department
717 Etna Road
Ottawa, IL 61350

815-433-3366
Fax: 815-433-9522
Web: www.lasallegcounty.org/frm_set_index.htm

Thomas Templeton
La Salle County Sheriff
707 E. Etna Road
Ottawa, IL 61350

815-433-2161
Fax: 815-434-8393
Web: www.lasallegcounty.org/frm_set_index.htm

Linda Kendall
Chief County Assessment Officer
707 E. Etna Road
Ottawa, IL 61350

815-434-8233
Fax: 815-434-8327
E-mail: lkendall@lasallegcounty.org

Donald Lamps
La Salle County Treasurer
707 E. Etna Road
Ottawa, IL 61350

815-433-8219
Fax: 815-433-8248
Web: www.lasallegcounty.org/frm_set_index.htm

C.4 DAYTON TOWNSHIP OFFICIALS

Phyllis Donahue, Supervisor
Earl Donahue, Clerk
3312 E. 18th Road
Ottawa, IL 61350

815-433-0855
Fax: 815-433-0855
E-mail: daytontwp@gmail.com

Marty Wheatland, Road Commissioner
Bill Vogel, Assessor

Trustees

Michael Stone
Paul Newton

Robert Rogowski
Paul Pitstick

C.5 EPA REPRESENTATIVES

Heriberto León
Community Involvement Coordinator
Community Involvement Section
Superfund Division (SI-7J)
EPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604-3590

312-886-6163 or
800-621-8431 Ext. 66163
Fax: 312-697-2754
E-mail: leon.heriberto@epa.gov

Steve Faryan
On-Scene Coordinator
Superfund Division (SE-5J)
EPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604-3590

312-353-9351
Fax: 312-353-9176
E-mail: faryan.steven@epa.gov

EPA Website:

www.epa.gov/region5/cleanup/wedron

C.6 AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY REPRESENTATIVES

Dr. Mark Johnson
Senior Environmental Health Scientist
Agency for Toxic Substances
and Disease Registry
77 W. Jackson Blvd. (ATSD-4J)
Chicago, IL 60604

312-353-3436
Fax: 312-886-6066
E-mail: mkj5@cdc.gov

C.7 ILLINOIS REPRESENTATIVES

John Richardson
Remedial Project Manager
Illinois EPA
1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276

217-782-0243
Fax: 217-782-3258
E-mail: john.richardson@illinois.gov

Kathy Marshall
Environmental Toxicologist
Illinois Department of Public Health
525 W. Jefferson, 3rd Floor
Springfield, IL 62761

217-782-5830
Fax: 217-785-0253
E-mail: kathy.marshall@illinois.gov

C.8 NEWS MEDIA

C.8.1 NEWSPAPER

| | |
|---|------------------------------------|
| Steve Stout, Staff Writer | 815-431-4082 |
| Lisa Ostby, Advertising | 815-431-4059 |
| <i>Ottawa Times</i> (Daily) | Ad Fax: 815-433-1626 |
| 110 W. Jefferson St. | Ad E-mail: lisao@mywebtimes.com |
| Ottawa, IL 61350 | News E-mail: steves@mywebtimes.com |
| Jeff Dankert, Reporter | 815-220-6977 |
| <i>News Tribune</i> (Daily except Sunday) | E-mail: perureporter@newstrib.com |
| 426 2 nd St. | |
| LaSalle, IL 61301-2366 | |

C.8.2 TELEVISION

No local stations

C.8.3 RADIO

| | |
|-------------------------------|-----------------------------------|
| WCMY 1430 AM & WRKX 95.3 FM | 815-434-6050 |
| 216 W. Lafayette St. | Fax: 815-434-5311 |
| Ottawa, IL 61350 | News E-mail: info@ottawaradio.net |
| WNIJ – 89.5 FM WNIU | 815-753-9000 |
| 90.5/105.7 FM (NPR) | Fax: 815-753-9938 |
| 801 N. First St. | News: 815-753-7000 |
| DeKalb, IL 60115 | E-mail: nprnews@niu.edu |
| WALLS 102 FM, | |
| WSTQ/WIVQ 97.7 FM & 103.3 FM, | |
| WYYS 106 FM, WGLC 100.1 FM, | |
| WBZG 100.9 FM, WSPL 1250 AM | |
| Nick Deranek, News Reporter | 815-224-2100 |
| The Radio Group | Cell: 630-808-3758 |
| 3905 Progress Blvd. | E-mail: nick@theradiogroup.net |
| Peru, IL 61354 | |