JERRY F. COSTELLO
12TH DISTRICT, ILLINOIS

PLEASE RESPOND TO THE
OFFICE CHECKED BELOW:

# Congress of the United States
## House of Representatives
Washington, DC 20515-1312

COMMITTEES:
BUDGET
PUBLIC WORKS AND TRANSPORTATION
SCIENCE, SPACE, AND TECHNOLOGY
(ON LEAVE)
SELECT COMMITTEE ON AGING

153510

March 1, 1994

RECEIVED
MAR 9 1994
SITE ASSESSMENT SECTION

Mr. Alan Altur
Site Assessment Manager
EPA, Site Assessment Section
Office of Superfund
77 W Jackson
Chicago, IL 60604

Dear Mr. Altur:

I am writing in regard to Dead Creek in Cahokia, Illinois and I am interested in obtaining updated information as to the EPA's progress with this matter.

Recently, I held a town hall meeting in Cahokia and was confronted by several concerned residents. I am considering holding a special meeting in the area and inviting all concerned parties in an effort to bring them up-to-date on this issue.

Enclosed you will find a copy of the letter I received on December 9, 1993 from Mr. Tom Walters, Legislative Liaison with the Illinois EPA. As I understand, the process of becoming included in the National Priorities List is lengthy. Any further information you could provide me would be appreciated.

If you have any questions please feel free to contact my office manager Anne Risavy at 618/233-8026. Please forward any correspondence to my office address marked below.

Mr. Altur, thank you for your attention to this matter and I look forward to hearing from you.

Sincerely,

JERRY F. COSTELLO
Member of Congress

JFC/amr

Enclosure

☐ 119 CANNON BUILDING
WASHINGTON, DC 20515
TEL: (202) 225-5661
FAX: (202) 225-0285

☒ 327 W. MAIN ST.
BELLEVILLE, IL 62220
TEL: (618) 233-8026
FAX: (618) 233-8765

☐ 1363 NIEDRINGHAUS AVE.
GRANITE CITY, IL 62040
TEL: (618) 451-7065
FAX: (618) 451-2126

☐ 250 W. CHERRY ST.
CARBONDALE, IL 62901
TEL: (618) 529-3791
FAX: (618) 549-3768

☐ 8787 STATE ST.
EAST ST. LOUIS, IL 62203
TEL: (618) 397-8833

☐ 1330 SWANWICK ST.
CHESTER, IL 62233
TEL: (618) 826-3043

CONTROLLED CORRESPONDENCE

OFFICE OF THE REGIONAL ADMINISTRATOR (R-19J)

From: JERRY COSTELLO IL HOUSE OF REP.

Control Number: ORAC-888

Date Received: 03/17/94
Due Date.....: 03/30/94
Extension....: / /
Interim.....: / /
Final Due Date: / /

Subject: QUESTIONS OF EPA'S PROGRESS REGARDING DEAD CREEK IN CAHOKIA, ILLINOIS

Assigned To: WMD/CSF

Date Assigned: 03/17/94

Action: PREPARE RESPONSE

Due To Div.: / /

Sign. Req.: Y

SIGNATURE: RA

Signature Date: / /

COURTESY COPIES:
1) ORA W/CONTROL SLIP
2) AL W/CONTROL SLIP
3) CANAVAN
4) WESTLAKE

COORDINATE EXTENSION REQUESTS WITH ORA CORRESPONDENCE ASSISTANT:
DOROTHY WORMBLY AT 6-9736.

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Assigned To: WMD/OSF

Date Assigned: 03/17/94

Action: PREPARE RESPONSE

Due To Div.: / /

Sign. Req.: Y

SIGNATURE: RA

Signature Date: / /

COURTESY COPIES:
1) ORA W/CONTROL SLIP
2) AL W/CONTROL SLIP
3) CANAVAN
4) WESTLAKE

COORDINATE EXTENSION REQUESTS WITH ORA CORRESPONDENCE ASSISTANT:
DOROTHY WORMBLY AT 6-9736.

MAR 30 1994

R-19J

The Honorable Jerry Costello
Member, United States House
of Representatives
327 W. Main Street
Belleville, Illinois 62220

Dear Mr. Costello:

Thank you for your letter of March 1, 1994, regarding updated information on the National Priorities List (NPL) evaluation of the Dead Creek area in Sauget and Cahokia, Illinois.

In general, a site is proposed for the NPL by preparation of a Hazard Ranking System (HRS) scoring package. If the site score exceeds 28.5, it is submitted to the United States Environmental Protection Agency (U.S. EPA) Headquarters for Quality Assurance/Quality Control (QA/QC). The QA/QC revisions are forwarded to the Region who then prepares the final draft package. This final draft is then forwarded by U.S. EPA Headquarters to the Office of Management and Budget (OMB) who reviews all potential NPL candidate sites. If the site passes OMB review, the site is then proposed draft to the NPL by publication in the Federal Register. A sixty day comment period then follows and the EPA must respond to all comments that are received before that site can be proposed final on the NPL. The final proposal is also published in the Federal Register.

Currently, we are evaluating this area, known as Sauget Area 1 under the site assessment program, as a candidate for the National Priorities List. Since we are in the early stages of this process, we cannot discuss the specifics of this particular HRS package since it is considered predecisional. In addition to the HRS review, the U.S. EPA has also begun the evaluation of Potentially Responsible Parties (PRPs) to determine the likelihood of an enforcement action at this site.

I have enclosed a copy of a briefing memorandum that was prepared for our Agency by the Illinois Environmental Protection Agency (IEPA). As you know, the IEPA is actively involved in evaluating the Sauget Area and has provided most of the site assessment information, to date. Their fact sheet gives a brief description of the various sites which constitute Sauget Area 1. Since receipt of your previous letter sent by IEPA on December 9, 1993, the IEPA in response to a citizen complaint sampled at Site M on

March 11, 1994. Initial review of the sample results reveal similar compounds as indicated before. The Illinois Dept. of Health (IDPH), in conjunction with the IEPA, are reviewing the results and will provide their final determination to the City of Cahokia.

If you have any additional questions, please contact me. Thank you for your interest in this matter.

Sincerely yours,

/s/ original signed by
William Sanders III

Valdas V. Adamkus
Regional Administrator

Enclosure

bcc: ORA w/control slip
M. Canavan, ORA
AL w/control slip
K. Westlake, ORA
P. Takacs, IEPA
J. Gore, RRB
S. Borries, ERB
T. Martin, ORC
S. Pastor, OPA
R. Webb, OSF, w/control slip
M. Johnson, ERB, w/control slip
N. Maier, WMD, w/control slip

SUBJECT FILE -- CONCURRENCES

| AUTHOR | SAS SECTION SEC. | SAS SECTION CHIEF | ERB BRANCH SEC. | ERB BRANCH CHIEF | OSF ADD'S OFFICE | WMD DIRECTOR'S OFFICE |
|---|---|---|---|---|---|---|
| AA 3-30-94 | 3-30-94 | 3-30-94 | 3/30/94 | 3-30-94 | | 3/30/94 for WE III |

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3/30/94

## Briefing Memorandum on Sauget Area 1 Sites

The Sauget Area 1 sites comprise three hazardous waste disposal landfill, a formerly used waste impoundment, two abandoned gravel pits and five intermittent segments of Dead Creek. These sites had allegedly received hazardous materials/wastes from local industries that became established in this vicinity around the turn of the century. The primary disposal methods included direct industrial wastewater discharges into the five identified segments of Dead Creek, and controlled/uncontrolled disposal at the other six sites. The contaminants found at the Sauget Area 1 sites consist mainly of chlorobenzenes, chlorophenols, chloroanilines, nitrophenols, nitroanilines, napthalene, PCBs and PNAs. These sites were aggregated together on the basis of their relative proximity to each other, shared watershed, nearly identical contaminants, and a common property owner at many of the sites during the periods of disposal. Provided below is a brief description of each site:

### Site G

A former surface/subsurface hazardous waste disposal site which was originally used as a gravel pit. Site G occupies about 4.5 acres and is littered with demolition debris, metal wastes and corroded drums. Oily and tar-like wastes are found mainly in areas where drums are present, however most of the landfill is only partially covered with fly ash and cinders. IEPA estimates that there is approximately 22,000 cubic yds. of contaminated fill and about 60,000 cubic yards of saturated chemical waste materials. Surface soil sampling revealed PCBs (74,000 ppm total), 1,4-dichlorobenzene (22,000 ppm), PCP (21,00 ppm), 4-nitrophenol (1000 ppm), 2-nitroaniline (220 ppm), and PNAs. The primary contaminants detected in subsurface soils included naphthalene (5429 ppm), PCP (4769 ppm) and 4-chloroaniline (231 ppm). Access to the site is restricted by a chain-link fence installed by the USEPA. Aerial photos show major disposal activities occurring at Site G from the early to mid-1950s to the mid-1960s after which sporadic disposal occurred until it was fenced in 1982.

### Site H/I

Both Site H and Site I are former gravel pits with only portions of Site I filled with chemical wastes. Site H is about 5 acres and is completely covered with fly ash and cinders while Site I is having the same cover materials and being completely covered, is approximately 55 acres. Aerial photos indicate that waste disposal at these sites began prior to 1937 and continued until the mid to late 1950s. IEPA estimates the volume of fill material to be about 116,000 cubic yards and saturated chemical waste material about 250,000 cubic yards. Predominant contaminants found at Site H included dichlorobenzene (50,242 ppm total), 1,2,4-trichlorobenzene (7581 ppm), naphthalene (2,265 ppm), 4-nitroaniline (1,834 ppm), PCBs (1,800 ppm) and PNAs.

Site I has similar contaminants but at lower concentrations with the exception of 1,2,4-trichlorobenzene (8,225 ppm) and cyanide (3,183 ppm). Access to Site H is completely unrestricted, however waste materials are not present at the surface as they are at Site G. Access to Site I is restricted by a chain-link fence and a 24 hour guard at both entrances to the business which owns the site.

**Site L**

This site is the location of a former surface impoundment used by a local hazardous waste hauling firm. It is approximately 70 feet by 150 feet and about 8 feet deep. The site is mostly covered with cinders and access is not restricted. The main contaminant at Site L consist of PCBs (500 ppm), 4-chloronaniline (270 ppm) and PNAs.

**Site M**

Site M is a formerly used gravel pit that was excavated sometime in the 1940s. The principle contaminants at Site M included PCBs (505 ppm total) and dichlorobenzenes (66 ppm total). The Monsanto Company has performed most of the investigatory work at this site. Monsanto determined that the volume of sediment from Dead Creek migrating into Site M is on the order of 3,600 cubic yds. Access to this site is restricted by a chain-link fence installed by U.S. EPA in 1982. The probability that persons could come into contact with PCB-contaminated sediments is low considering the contaminated sediment is always under water.

**Site N**

Another site located next to Dead Creek, Site N was a 10 foot deep excavation owned and operated by a construction company. The site was evidently used for disposal of construction and demolition debris. Two soil borings have shown PNA contamination, however the main group of chemicals found at other Area 1 sites were not found at Site N. Access at Site N is restricted by a chain-link fence.

**Dead Creek Segment A**

Located next to Site I, this portion of Dead Creek is owned by Cerro Copper Products, Inc. As the the culvert at the south end of Dead Creek Segment A (CS-A) had been blocked, this site behaved as an impoundment. It was used a surcharge basin for the Village of Sauget sewer system during storm events. Given that most of the users in the system were industries, this site received a large volume of industrial process wastewater. Many of the contaminants found at this site were of the same nature as those found at other Sauget Area 1 sites. As part of a consent decree with the State of Illinois, Cerro Copper agreed to remove approximately 25,000 cubic yds. of contaminated creek sediment from CS-A in 1990 at the cost of over $13.6 million. Work was

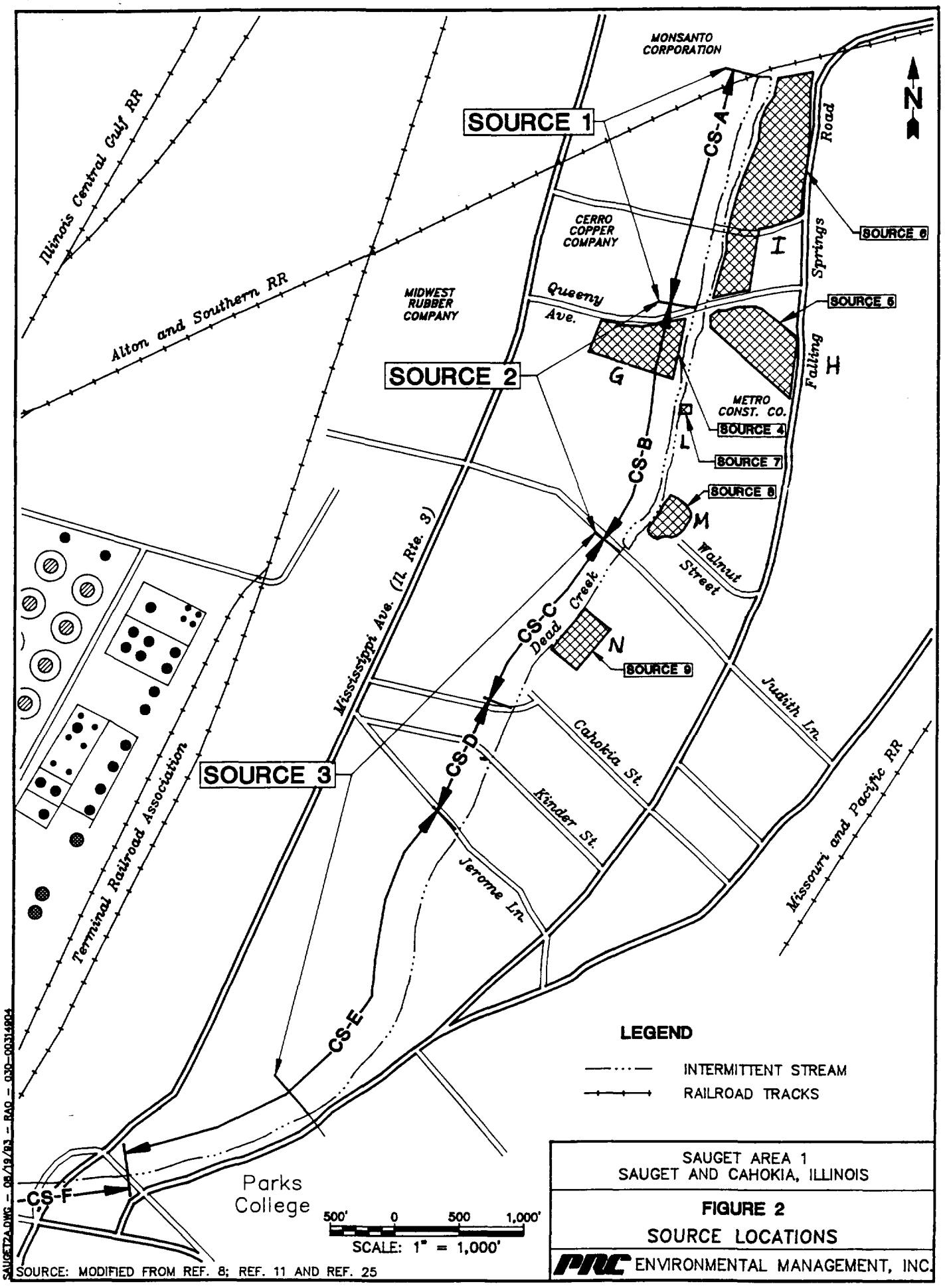
performed under IEPA oversight and CS-A was backfilled and regraded after the removal was complete. A vapor barrier was placed beneath the final regrade to inhibit volatilized compounds coming from groundwater flowing through Site I.

**Dead Creek Segment B**

As in the case with the above site, the culvert at the south end of Dead Creek Segment B (CS-B) was sealed, also causing this site to behave as an impoundment. CS-B received the same wastewater flows from the Sauget industries prior to the sealing of the culvert at the south end of CS-A. CS-B also received direct wastewater flows from a rubber recycling operation, the hazardous waste hauling firm that operated at Site L and overflows from Site L when it was in use. CS-B also recieves surface runoff from Site G. The main contaminants found in the sediments at this site include PCBs (546 ppm total), diclorobenzenes (237 ppm total) and minor amounts of PNAs, naphthalene and chlorobenzenes. Access to this site was restricted by a chain-link fence installed by U.S. EPA. Additional sediment sampling by the Monsanto Company has further verified that creek sediments have been impacted by PCBs. Sampling by IEPA has shown that surface water in CS-B is affected by contaminants from Site G.

**Dead Creek Segments C, D, E**

These segments of Dead Creek received the same industrial flows from the Sauget industries and sources mentioned above prior to the culverts being blocked at CS-A and CS-B. Because these blocking actions had occurred long ago, many of the contaminants which IEPA suspects should be present have since volatilized. Presently, the main contaminants of concern in these creek segments are PCBs. Very limited sampling has revealed total PCB concentrations of up to 60 ppm, These segments of Dead Creek run through residential areas of Cahokia and access to them is completely unrestricted.




SOURCE: MODIFIED FROM REF. 8; REF. 11 AND REF. 25

SAUGET AREA 1
SAUGET AND CAHOKIA, ILLINOIS

**FIGURE 2**

SOURCE LOCATIONS

PRC ENVIRONMENTAL MANAGEMENT, INC.

SAUGET2A.DWG - 08/19/93 - RAO - 030-00314904

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director 2200 Churchill Road, Springfield, IL 62794-9276

(217) 782-3397

December 9, 1993

The Honorable Jerry Costello
United States Congressman
1363 Niedringhaus Avenue
Granite City, Illinois 62040

Dear Congressman Costello:

Thank you for you letter of November 23, 1993 in which you requested information regarding Dead Creek in Cahokia, Illinois. The following information is to address the questions and concerns of your constituents, Richard and Diane McDonnell.

**Studies have found "30 different chemicals" in Dead Creek:**

Environmental studies have found contamination in Dead Creek, but the most significant problem from a human health standpoint is the PCB-contaminated sediment at the bottom of the creek bed. PCBs (Polychlorinated Biphenyls) do not move readily in groundwater, since they tend to bind tightly to soil particles. There might be an increased hazard if the sediment were to be transported downstream (through pumping from the creek-bottom, or opening the culvert at the creek-bottom under Judith Lane, for example). However, in the present situation, the greatest public health threat would occur if the creek were to dry up completely, allowing PCB-contaminated sediments in the creek bed to be carried by the wind or by animals into nearby residential yards. Such a development appears to be far in the future, at this point.

IEPA has submitted the Superfund "scoring package" for Sauget Sites Area I to U.S. EPA's Region V office, where it is under final review. This document is the basis for proposing the area containing Dead Creek for inclusion in the National Priorities List (NPL). The final package is expected to go to U.S. EPA headquarters this month? and the federal agency could formally propose Area I for the NPL as soon as the spring of 1994?

**Eight-foot-high fence around part of Dead Creek:**

True? In the 1980's U.S. EPA constructed a fence around Dead Creek Segment B (north of Judith Lane, to Queeny Ave., in Sauget), and around several other Sauget Sites (Site G, Site

page 2 - Dead Creek

[redacted] in order to limit public access and prevent exposure of the public to the chemical contamination known to be present at those sites. In some cases the danger was not only direct contact, but also the possibility of consuming contaminated fish from those waters. Another purpose of constructing the fence was to prevent any continued dumping of wastes at the sites.

**EPA "blocked the creek" at Judith Lane"**

IEPA has no formal record of how the culvert under Judith Lane came to be blocked. We believe that the culvert was probably blocked in the late 1960s or early 1970s in order to halt the further southward migration of contaminants that were known to be moving into the two northern segments of the creek from adjacent hazardous waste sites. It is not presently clear what governmental unit or private party actually ordered or carried out the blocking action, but the finding in more recent years of PCB contamination in sediments above Judith Lane (as well as those south of Judith) makes this action seem prudent today. The fact that the PCBs tend to stay with the sediment particles, however, suggests a remedy for the concerns expressed by area residents. If water could be pumped out of Segment B to the nearby American Bottoms wastewater treatment plant, without disturbing the PCB-contaminated sediments, the water level could be reduced.

**Concerns about possible health hazards from odors in creek:**

Responding to concerns expressed over the summer by area residents, IEPA sampled the creek water both above Judith Lane (9/24/93, 9/28/93, & 10/15/93) and below Judith (10/15/93) to make sure the water did not pose a significant public health threat. IEPA's Office of Chemical Safety (OCS) concluded that the contaminants present in the water would not pose a public health risk, but noted that certain chemicals (notably phenolics) that were characteristic of Site G (west of Dead Creek south of Queeny Ave.) were found above the very low odor threshold for these chemicals. Residents would smell these chemical odors at levels far too low to be harmful.

The Office of Chemical safety also noted that the levels of iron, lead, and phenolic compounds in the water exceeded State water quality standards and would be potentially damaging to fish and other aquatic species.

**IEPA says not to drain the creek:**

IEPA has long warned against disturbing the contaminated sediments in the creek, and the State has not had the funding

that would have been needed to pay for pumping water from above Judith Lane into the American Bottoms treatment works. The IEPA has been open to that solution from the start of this unusual flooding event, but no party came forward with a workable way to get the water from the creek to the treatment works: no sewers existed nearby in Cahokia with the needed capacity.

However, as noted previously, based on both old and recent sampling, IEPA held the view that water could safely (from a human health standpoint) be pumped from this creek segment as long as the sediments were not disturbed. This could be accomplished by keeping the pump intake a sufficient height above the creek bed. Thus, the creek segment could not safely be pumped dry (not a desirable state anyway, since that would expose contaminated sediments), but it could be pumped down, considerably, to alleviate the flooding problem. Again, because tests of the water in Dead Creek north of Judith Lane have exceeded State water standards and could harm the environment, the IEPA has recommended the option of pumping the water to a treatment facility.

On November 16, 1993, after a particularly heavy series of storms, Mayor King, of Cahokia contacted IEPA to inform the Agency that Cahokia was starting to pump water from above Judith Lane to the next segment of Dead Creek. The mayor was informed that Cahokia was undertaking some risk of being drawn in as a Potentially Responsible Party if it were to be claimed in the future that this action had spread contamination from the area north of Judith Lane. IEPA also emphasized that recent tests of the surface water had shown levels of contamination that would violate state standards na might harm aquatic species if the water were not treated before being released to the environment. Cahokia officials were advised strongly to avoid placing the intake so as to disturb the contaminated sediments, however.

Further discussions with the mayor led to a phone conference with IEPA that concluded that no treatment process would be required for the emergency pumping to alleviate the flooding, based on IEPA's recent sampling results and the dilution with other runoff water prior to the water reaching the Mississippi River (see attached letter from Mayor King). The pumping continued for several days, was halted for several more, and was resumed when groundwater recharge apparently refilled the creek.

While the pumping continues, IEPA has periodically sampled the creek water. IEPA took a sample of the water being pumped from north of Judith Lane on 11/19/93 and found increased levels of phenolic compounds. Again, these levels do not indicate any human health risk, but they show an

increased threat to aquatic organisms.

**Perceived hazard to residents from water seepage into basements:**

In response to concerns expressed by the McDonnell's, IEPA sampled the seepage water in their basement in June, 1993, and followed up on September 28 by re sampling that basement, and five others near the creek that had seepage problems. Stan Black, of IEPA's Office of Community Relations, notified all the residents by phone on October 12 that the sample results had been quite normal for basement seepage water, posing no health risk to residents. IEPA sent residents copies of the lab results for their records on November 9 & 10, and the Illinois Department of Public Health (IDPH) sent letters to the residents explaining the results in health terms on November 24.

**Property value concerns; Need to inform potential buyers:**

Stan Black, of IEPA's Office of Community Relations, had indeed mentioned to Diane McDonnell in the course of a phone conversation that several realtors and/or appraisers from her area had called him to obtain information on contamination in the Dead Creek area. They had specifically mentioned that they had a professional "duty to inform" potential buyers in the area about possibly adverse factors that could affect property values. Part of the motivation for IEPA's effort to add Area I to the NPL is the desire to remedy the environmental problems in the area so that local residents will not need to be concerned about their effects on property values.

This response to your inquiry has been delayed by the fluidity of the Dead Creek situation. Indeed, matters have not yet reached a settled state, by any means. We are sending your office this response in order to be as complete as possible at this time, but we will also provide further updates as additional developments occur.

If I can be of further assistance, please do not hesitate to call.

Sincerely,

Thomas P. Walters

Thomas P. Walters
Legislative Liaison

MGkml048

Enclosure