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# RIVER PRAIRIE GROUP

DuPage County, Illinois

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RPG River Monitoring Network - 2007 State of Illinois Environmental Hero Award Recipient

October 21, 2009

The Honorable Lisa P. Jackson  
Administrator  
USEPA Ariel Rios Building (AR)  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20004

Dear Ms. Jackson,

re: NPL site #ILD980823991; Kerr-McGee (Kress Creek/West Branch of DuPage River)

River Prairie Group, the Sierra Club's local chapter in DuPage County, Illinois, has been actively monitoring the Tronox (nee Kerr-McGee) NPL project since 2005. During this time, we have engaged with the community, attended project-sponsored meetings, participated in the public comment process, communicated with Region 5 and subcontractor personnel, and monitored ambient radionuclide levels in the water column. Given the project's relative low profile beyond the riparian corridor, we have also fielded inquiries from some individuals who were surprised to learn of an active Superfund site within their county and others who were simply interested in knowing if "the river is safe".

In the earlier part of this year, we were in contact with project personnel regarding the not altogether surprising bankruptcy filing of Tronox and its impact on continued project financing. With the bankruptcy court's September approval of Tronox's sale, there is now a likelihood that the NPL site status will move from 'limbo' to 'canceled'.

In light of these events, we request that Region 5 utilize CERCLA to fund the project through completion; specifically, to finance the remediation and restoration of the remaining river segments - Reach 7 (Butterfield Road to Warrenville Dam; *figure 1*) and Reach 8 (Warrenville Dam to McDowell Dam; *figure 2*). While the primary project objective is removal of contaminated material, the restoration component is critical to prevent bank erosion. The restoration plan should inherit the current provision for ongoing (three year) monitoring, as the past few springs have illustrated that newly planted site vegetation is easily destroyed by floodstage streamflow (*figure 3*). And, while aesthetics may seem like an ancillary objective to a project of this nature, the return of the riparian corridor to its prior vegetative state is a priority for homeowners whose property values continue to be impacted by the project, and *should* be a priority for the EPA, as the banks of this river present to county residents the public face of an otherwise nebulous agency. The project, it should be noted, skirts residential and public (forest preserve, park, and school) property along its entirety.

If, for some reason, this project is not eligible for CERCLA funding or if CERCLA funding does not materialize in a reasonable time, we request that your office solicit its share of funds from the pending lawsuit against the parent company (Anadarko Petroleum Corporation), filed in May of this year in federal court by U.S. Attorney L. Dassin on behalf of EPA.

We are optimistic and confident that the political climate fostered by the new administration will enable a return to normalcy for the EPA, granting the agency both the freedom and funding to pursue its charter.

Thank you for considering our request.

Sincerely,

Paul Mack  
River Prairie Group  
Sierra Club – DuPage County, Illinois

cc: Mr. Timothy Fischer, Project Manager  
USEPA - Region 5

Figure 1. Reach 7 of ILD980823991, showing pedestrian bridge.



Figure 2. Reach 8 of ILD980823991, showing pedestrian bridge.



Figure 3. Reach 5E of ILD980823991 at floodstage. Note eroded, breached bank in foreground and destroyed restoration plantings along its entirety. Excavation completed 12/07, photo taken on 3/9/09.

