



What to Expect in the NJ/Zinc Mobil Chemical Assessment Plan

Purpose of the Assessment Plan (43 C.F.R. Part 11):

The Assessment Plan (AP) is a *work plan* used to guide Trustee actions to perform a Natural Resource Damage Assessment (NRDA) in a planned and systematic manner, and to ensure that the assessment methodologies selected can be conducted at a reasonable cost. The goal of the plan is to present a proposed approach and methods for identifying natural resource injuries and determining the value of the injuries that have resulted from the hazardous substances released from the Site.

The Trustees based this AP on their knowledge of the Site, their natural resource interests, and on the extensive Remedial Investigation/Feasibility Study (RI/FS) dataset. These factors help to guide the cooperative approach with the PRPs (Potentially Responsible Parties). In this cooperative approach, the PRPs were made aware of the Trustee plan and provided feedback to the Trustees.

What does the AP include? (43 CFR Part 11.31):

There are seven major parts of the AP, as outlined below:

1. Descriptions of the geographic areas and natural resources involved (Sections 2.1.1 and 2.1.2).

The assessment area includes all locations where hazardous substances released at the Site have come to be located. The assessment area extends to anywhere injury may occur, and the area may change based on the Trustees' evaluation of the data.

2. Information sufficient to demonstrate coordination with the RI/FS process (Sections 2.1.3 & 2.2).

The Trustees must consider previous, current, and future remedial activities occurring at the Site. This consideration enables the Trustees to coordinate with the RI/FS process and avoid duplication of data, reduce costs and achieve common objectives where possible.

3. A statement of authority for asserting trusteeship, or co-trusteeship, for natural resources (Section 3.1).

CERCLA (Superfund) and CWA (Clean Water Act) give Trustees the authority to assess and seek to recover damages to natural resources. At this Site, the Trustees are the Directors of the Illinois EPA and IDNR.

4. Procedures and schedules for sharing data, splitting samples, and providing analytical results to PRPs and other interested parties (Sections 5.1 & 5.1.2).

The NRDA process requires that all potentially relevant data, reports, and studies will be shared with any other interested parties once the data have been validated and are available. Examples of the types of data used for this AP include (but are not limited to): government, industry, and RI/FS data and reports; long-term monitoring data being collected for the Site; ecological risk assessments conducted for Operable Units (OUs), including supporting studies and information; and other ecological or toxicological studies (e.g. the fingernail clam study being conducted by the DePue Group in 2017 & 2018).

5. An explanation of the decision to proceed with a Type B Assessment (Section 3.2).

A Type B Assessment provides alternative methodologies for conducting NRDA and consists of three phases: 1. injury determination, 2. injury quantification, and 3. damage determination. The Trustees supported their Type B Assessment decision with the substantial volume of existing Site-specific data and with the reasonable cost at which any additional Site-specific data could be collected.

6. Confirmation of exposure of natural resources to hazardous substances (Section 4).

Per the NRDA regulations, the AP should confirm that at least one of the natural resources identified as potentially injured in the preassessment screen has, in fact, been exposed to a Site-related hazardous substance.

Using existing data, Trustees were able to confirm that geologic, surface water, sediment, groundwater, and biological (including plants, birds, fish, aquatic macroinvertebrates, and mammals) resources at this Site were exposed to Site-related hazardous substances.

7. A Quality Assurance Plan (Section 7).

Quality Assurance Project Plans (QAPPs) ensure that the Trustees have thoroughly outlined quality objectives and quality indicators; have established procedures and criteria for maintaining and documenting custody and traceability of environmental samples and data; and have a consistent and documented set of QA/QC procedures for the preparation and analysis of samples and data. These QAPPs are utilized to make sure that data collected by the Trustees are as sufficiently complete, comparable, representative, unbiased, and precise as possible.

Public Review and Comment (43 CFR Part 11.32 (c)):

The AP will be made available to the public in May 2019. The report will be open for public comment for a 30-day period.

Comments on the AP may be sent to:

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This document, the forthcoming Assessment Plan, and other Site related documents can be found at:

<https://www.dnr.illinois.gov/programs/NRDA/Pages/Lake-DePue---New-Jersey-ZincMobil-Chemical-NPL-site.aspx>

