

**NOTICE OF INTENT TO PERFORM
A NATURAL RESOURCE DAMAGE ASSESSMENT**

**In re: SAUGET INDUSTRIAL CORRIDOR SITES
SAUGET, CAHOKIA, AND EAST ST. LOUIS, ILLINOIS**

POTENTIALLY RESPONSIBLE PARTIES:

(See Attachment A)

Pursuant to state and federal laws, the Illinois Environmental Protection Agency, the Illinois Department of Natural Resources, the Missouri Department of Natural Resources, and the U.S. Department of the Interior (collectively, the “Trustees”) have authority to perform natural resource damage assessments for the Sauget Industrial Corridor Sites (hereinafter referred to as the “Corridor”), located within the Villages of Sauget, Cahokia, and East St. Louis, in St. Clair County, Illinois. The Corridor includes:

1. Sauget Area I, which contains Dead Creek Segments A, B, C, D, E, and F (includes Borrow Pit Lake), and Sites G, H, I, L, M, and N
2. Sauget Area II, which contains Sites O, P, Q, R, and S, and a defined ground water “Plume Discharge Area” of the Mississippi River, adjacent to Site R
3. W.G. Krummrich Plant
4. Clayton Chemical Site
5. Dead Creek, Prairie du Pont Creek, Cahokia Chute, and the Mississippi River

The Trustees have concluded their preliminary investigation of potential injuries to natural resources under their trusteeship which may have occurred as the result of releases of hazardous substances within the Corridor. Pursuant to 43 C.F.R. Part 11, the Trustees have completed the enclosed Preassessment Screen (Attachment B). The Preassessment Screen contains, to the extent known, a description of the Corridor; the releases of hazardous substances of concern to the Trustees; and the natural resources potentially injured. The Preassessment Screen is a public document. The public will be encouraged to provide input into the assessment process, including reviewing and commenting on the development of the Assessment Plan(s), as well as any restoration proposals developed pursuant to the natural resource damage assessment regulations.

Information gathered by the Trustees and presented in the Preassessment Screen forms the basis of the Trustees’ conclusion that the following criteria have been met:

*Notice of Intent to Perform a Natural
Resource Damage Assessment for the
Sauget Industrial Corridor Sites*

1. Releases of hazardous substances have occurred.
2. Natural resources for which the Trustees may assert trusteeship under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Clean Water Act (CWA), and other applicable federal and state laws, have been or are likely to have been adversely affected by the releases.
3. The quantity and concentration of the released hazardous substances are sufficient to potentially cause injury to natural resources for which the Trustees may assert trusteeship under CERCLA, CWA, and other applicable federal and state laws.
4. Data sufficient to pursue a natural resource damage assessment are available or likely to be obtained at a reasonable cost.
5. Currently implemented and planned response actions will not sufficiently remedy the injury to natural resources without further action.


Based upon the above findings, the Trustees have determined that it is appropriate to perform a natural resource damage assessment for the Corridor, and hereby provide you with notice of their intent to do so. Your company or municipality has been identified as a potentially responsible party (PRP) in connection with the releases of hazardous substances and the subsequent damages resulting from injuries to natural resources. Accordingly, your company or municipality is invited to participate in the development of the type and scope of the assessment, and in the performance of the assessment. Also, your company or municipality is requested to participate in the funding of all phases of the damage assessment.

We recommend that your company or municipality evaluate its potential responsibility and determine whether it will participate in the assessment process. Within thirty (30) calendar days of your receipt of this notice, please provide a written response to all of the legal representatives designated in the attached cover letter indicating whether your company or municipality intends to participate in the natural resource damage process for the Corridor.

<Signature Pages Follow>

*Notice of Intent to Perform a Natural
Resource Damage Assessment for the
Sauget Industrial Corridor Sites*

U.S. Department of the Interior



Tom Melius, Regional Director
U.S. Fish and Wildlife Service, Region 3
Authorized Official for Department of the Interior
One Federal Drive
Fort Snelling, MN 55111-4056

Charles M. Wooley
Acting Regional Director

4/17/09
Date

*Notice of Intent to Perform a Natural
Resource Damage Assessment for the
Sauget Industrial Corridor Sites*

Illinois Environmental Protection Agency

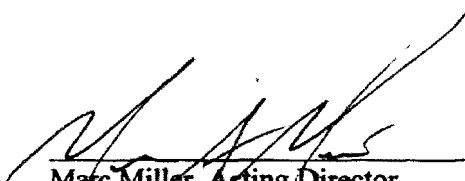


Douglas P. Scott, Director
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62796-1276

May 6, 2009
Date

*Notice of Intent to Perform a Natural
Resource Damage Assessment for the
Sauget Industrial Corridor Sites*

Illinois Department of Natural Resources



Marc Miller, Acting Director
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, IL 62702

527-09

Date

*Notice of Intent to Perform a Natural
Resource Damage Assessment for the
Sauget Industrial Corridor Sites*

Missouri Department of Natural Resources



Mark N. Templeton, Director
Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65101

4/28/09

Date