

FINAL RESTORATION PLAN
FOR THE
YEOMAN CREEK LANDFILL SUPERFUND SITE
AND
KERR-MCGEE KRESS CREEK/WEST BRANCH DUPAGE RIVER
SUPERFUND SITE

Prepared by:

U.S. Department of the Interior
Fish and Wildlife Service

May 2018

ACRONYMS AND ABBREVIATIONS

CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
DOC	U.S. Department of Commerce
DOI	U.S. Department of the Interior
EPA	U.S. Environmental Protection Agency
FWS	U.S. Fish and Wildlife Service
IDNR	Illinois Department of Natural Resources
IEPA	Illinois Environmental Protection Agency
KMS	Kerr-McGee Kress Creek/West Branch DuPage River Superfund Site
MBTA	Migratory Bird Treaty Act
NEPA	National Environmental Policy Act
NRDA	Natural Resource Damage Assessment
NRDAR	Natural Resource Damage Assessment and Restoration
NWR	National Wildlife Refuge
RP	Restoration Plan
USC	United States Code
YCL	Yeoman Creek Landfill Superfund Site

1.0 INTRODUCTION

This Final Restoration Plan (RP) presents and evaluates proposed restoration actions to address natural resources and resource services injured or lost due to the release of hazardous substances from the Yeoman Creek Landfill Superfund Site (YCL) and Kerr-McGee Kress Creek/West Branch DuPage River Superfund Site (KMS). This RP is part of restoration planning required under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The YCL is located in Waukegan, Lake County, Illinois and the KMS is located in West Chicago, DuPage County, Illinois.

In 2007, a settlement agreement for the YCL was reached between the responsible parties (Browning-Ferris Industries LLC; BFI Waste Systems of North America Inc.; the City of Waukegan, Illinois; Abbott Laboratories; Waukegan Community School District No. 60; the Goodyear Tire & Rubber Company; and Invitrogen Corporation) (Settling Defendants) and the YCL Trustees, the United States Department of the Interior (DOI), represented by the U.S Fish and Wildlife Service (FWS), the United States Department of Commerce (DOC), represented by the National Oceanic Atmospheric Association (NOAA), the Illinois Department of Natural Resources (IDNR), and the Illinois Environmental Protection Agency (IEPA), to resolve claims under CERCLA. NOAA, IEPA and IDNR, although YCL Trustees, will participate in the RP in an advisory-only role.

In 2005, a settlement agreement for the KMS was reached between the responsible party (Kerr-McGee Chemical LLC) and the KMS Trustees: DOI, the IDNR, and the IEPA, to resolve claims under CERCLA. IEPA and IDNR, although KMS Trustees, will participate in the RP in an advisory-only role.

The purpose of this RP is to document the selected restoration alternative that will restore, rehabilitate, replace, or acquire the equivalent natural resources and natural resource services injured as a result of the hazardous substance releases.

1.1 Trustee Authorities

Under CERCLA, Federal agencies, states, and federally-recognized Indian tribes that administer natural resources, are designated as natural resource trustees for those natural resources under their federal and state statutory authorities and responsibilities. These designated natural resource trustees have the authority under CERCLA and its regulations to restore, rehabilitate, replace, or acquire the equivalent of natural resources or natural resource services injured as a result of a hazardous substance release.

For the purpose of these incidents, the Region 3 Regional Director of the FWS has been designated as DOI's authorized official, to act as the natural resource trustee on behalf of the DOI Secretary.

The Trustees are responsible for the development of a restoration plan, and for the implementation and oversight of activities aimed at restoring natural resources injured by

the release of hazardous substances from the YCL and KMS. As lead administrative natural resource trustee, FWS is also responsible for administering the natural resource injury-related settlement funds and soliciting public input into the restoration process. Under the National Environmental Policy Act (NEPA), FWS must also assess the potential environmental impacts associated with the proposed restoration actions. Accordingly, the Trustees determined the preferred alternative qualifies under a categorical exclusion. An Environmental Action Statement documenting this determination has been prepared and is attached to this RP as Attachment A.

1.2 Summary of the Settlement

A Consent Decree for YCL was filed with the U.S. District Court for the Northern District of Illinois, by the United States on behalf of the YCL Trustees; and the Settling Defendants on April 4, 2007. The portion of the Consent Decree dealing with settlement of Trustee's natural resource damage claims required the Settling Defendants to pay \$200,000 to the DOI NRDAR Fund to pay for Trustee sponsored natural resource restoration projects. Per the CERCLA Natural Resource Damage Assessment (NRDA) regulations, these funds will be used to restore, replace, or acquire the equivalent of the injured natural resources.

A Consent Decree for KMS was filed with the U.S. District Court for the Northern District of Illinois, by the United States, on behalf of the KMS Trustees and Kerr-McGee Chemical LLC in 2005. The portion of the Consent Decree dealing with settlement of Trustee's natural resource damage claims required Kerr-McGee Chemical LLC to pay \$200,000 to the DOI NRDAR Fund to pay for Trustee sponsored natural resource restoration projects. Per the CERCLA NRDA regulations, these funds will be used to restore, replace, or acquire the equivalent of the injured natural resources.

1.3 Summary of the Hazardous Substance Releases and Injuries

The YCL is located between Sunset Avenue and Golf Road to the north, Glen Flora Avenue to the south, Lewis Avenue to the west, and Western Avenue to the east, in the City of Waukegan, Lake County, Illinois. The Site is approximately 60 acres in size. The Site operated as a landfill from 1959 to 1969. The landfill has no bottom liner and the underlying soils are permeable. Leachate from the landfill contains volatile organic compounds ("VOCs"), polychlorinated biphenyls ("PCBs"), bis(2-ethylhexyl) phthalate, and elevated concentrations of lead, manganese, iron, chloride, and ammonia. Some groundwater samples contained low concentrations of VOCs, bis(2-ethylhexyl) phthalate, and elevated concentrations of lead, chloride, and ammonia. Leachate from the site entered Yeoman Creek and adjacent wetlands. Sediments from Yeoman Creek at the landfill, and farther downstream at Yeoman Park, contain PCBs and other organic chemicals. The U.S. Environmental Protection Agency (EPA) placed the YCL on the Superfund National Priorities List on March 31, 1989 (EPA 2011).

The YCL is located within the drainage basin of the Waukegan River and its tributary, Yeoman Creek, flows adjacent to the Site. The Waukegan River discharges to Lake Michigan approximately 2.7 miles from the Site. The landfill is bordered by palustrine

emergent wetlands totaling approximately 105 acres. The YCL and surrounding area provides habitat that supports a variety of migratory birds. A cursory survey conducted by the FWS identified more than 11 species of migratory birds including waterfowl, songbirds and herons using the site. Yeoman Creek and the Waukegan River provide habitat for freshwater fish, including fish that migrate from Lake Michigan. Injury to these trustee resources occurred as a result of the release of hazardous substances from the Site. Birds may be exposed to PCBs from the fish, insects, and other animals in their diet, as well as through the soil they ingest while feeding. In studies at other locations and in the laboratory, PCBs have been linked to a wide range of adverse impacts to birds, including disease, behavioral abnormalities, genetic mutations, physical deformities, changes in brain chemistry, reduced hatching rates, mortality of embryos, and death of adult and juvenile birds. In addition, PCB-contaminated birds and bird eggs are a source of PCB contamination for the animals that consume them, such as reptiles, mammals, and other birds.

The KMS is located in West Chicago, DuPage County, Illinois and includes almost seven miles of creek and river sediment, banks and floodplain soils contaminated with radioactive thorium residue. The Kress Creek Site includes about a mile and a half of Kress Creek stretching from a storm sewer outlet to where the creek empties into the West Branch DuPage River. From there the site stretches about five miles down the West Branch DuPage River past the Warrenville Dam to the McDowell Dam. The radioactive thorium waste material was generated by a processing facility that operated in West Chicago between 1932 and 1973. The facility was originally owned by Lindsay Light and Chemical Co., but changed ownership several times. Kerr-McGee owned and operated the facility from 1967 to 1973 after which it closed the plant. Thorium and other elements were separated from ores at the plant using an acid process. This process created waste materials known as mill tailings that were stored at the facility. Wastes from the facility entered Kress Creek through a storm sewer, contaminating sediments in the Creek and the West Branch DuPage River. The thorium was also deposited onto floodplains during high water periods. Waste from the facility was also used as fill material at a sewage treatment plant and eroded into the West Branch DuPage River. The U.S. Environmental Protection Agency placed the KMS on the Superfund National Priorities List in 1990 (sewage treatment plant) and 1991 (creek and river) (EPA 2014).

The KMS is located within the drainage basin of the West Branch DuPage River, which flows through the Site. Kress Creek and adjacent wetlands and uplands provide habitat that supports a variety of migratory birds including waterfowl, songbirds and other wildlife. Injury to these trustee resources occurred as a result of the release of hazardous substances from the site. Thorium is a relatively reactive, metallic radioactive element. Radiation is a health risk because radioactive elements can emit energetic particles or electromagnetic radiation that can damage cells. The existing health effects data suggest that thorium may pose a potential health threat to an exposed population.

1.4 Purpose of Restoration

The purpose of the proposed restoration actions are to restore, rehabilitate, replace, or acquire the equivalent of natural resources (migratory birds, fish and other wildlife and their supporting habitat) and resource services that were injured or destroyed by the hazardous substance release from the YCL and KMS pursuant to applicable federal and state laws and regulations.

1.5 Compliance with Other Authorities

The following environmental laws were considered in the restoration planning process because they may impose limits or standards for restoration completion.

1.5.1 Clean Water Act

The Clean Water Act, 33 USC § 1251, *et seq.*, is the principal law governing pollution control and water quality of the nation's waterways. Section 404 of the Act authorizes the permit program that allows for the disposal of dredged or fill material into navigable waters. The U.S. Army Corps of Engineers administers this program. Restoration projects that move material into or out of waters or wetlands require individual Section 404 permits or may be addressed under nationwide permits.

1.5.2 Fish and Wildlife Conservation Act

The Fish and Wildlife Conservation Act, 16 USC § 2901-2911, authorizes federal financial and technical assistance to the states for the development, revision, and implementation of conservation plans and programs for nongame fish and wildlife.

1.5.3 Fish and Wildlife Coordination Act

The Fish and Wildlife Coordination Act, 16 USC § 661, *et seq.*, states that wildlife conservation shall receive equal consideration with other features of water resource development. The Act requires federal permitting and licensing agencies to consult with the FWS and state wildlife agencies before permitting any activity that in any way modifies any body of water to minimize the adverse impacts of such actions on fish and wildlife resources and habitat.

1.5.4 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA), 16 USC § 715, *et seq.*, provides for the protection of migratory birds. The MBTA may be used to consider time of year restrictions for construction activities on sites where it is likely migratory birds may be nesting, and to stipulate maintenance schedules that would avoid disturbances during the nesting seasons of migratory birds.

1.5.5 National Environmental Policy Act

The National Environmental Policy Act (NEPA), 42 USC § 4321, *et seq.*, established a national policy for the protection of the environment. NEPA applies to all major federal agency actions that affect the human environment. Federal agencies are obligated to comply with NEPA regulations issued by the Council on Environmental Quality. NEPA requires that for activities not categorically excluded, an analysis be conducted to determine whether proposed actions will have a significant effect on the quality of the human environment. If an impact is considered significant, then an Environmental Impact Statement (EIS) is prepared and a Record of Decision is issued. If the impact is considered not significant, then an Environmental Assessment is prepared and a Finding of No Significant Impact is issued.

1.5.6 Endangered Species Act

The purpose of the Endangered Species Act (ESA), 16 USC § 1531, *et seq.*, is to protect and recover imperiled species and the ecosystems upon which they depend. It is administered by the Interior Department's U.S. Fish and Wildlife Service (FWS) and the Commerce Department's National Marine Fisheries Service (NMFS). Section 7 of the Act requires agencies to consult with the FWS and NMFS, as appropriate, on actions that may affect federally listed species.

1.5.7 National Wildlife Refuge System Administration Act

The 1966 Act, 16 USC § 668dd, provides guidelines and directives for administration and management of all areas in the system, including "wildlife refuges, areas for the protection and conservation of fish and wildlife that are threatened with extinction, wildlife ranges, game ranges, wildlife management areas, or waterfowl production areas."

1.5.8 National Wildlife Refuge System Improvement Act of 1997

Public Law 105-57, approved October 9, 1997, (111 Stat. 1253) gives guidance to the Secretary of the Interior for the overall management of the Refuge System. The Act's main components include: a strong and singular wildlife conservation mission for the Refuge System; a requirement that the Secretary of the Interior maintain the biological integrity, diversity and environmental health of the Refuge System; a new process for determining compatible uses of refuges; a recognition that wildlife-dependent recreational uses involving hunting, fishing, wildlife observation and photography, and environmental education and interpretation, when determined to be compatible, are legitimate and appropriate public uses of the Refuge System; that these compatible wildlife-dependent recreational uses are the priority general public uses of the Refuge System; and a requirement for preparing comprehensive conservation plans.

1.6 Coordination and Scoping

This RP was prepared jointly by the YCL and KMS Trustees in accordance with CERCLA, 42 USC § 9601, *et seq.*. The goal of an injury assessment is to determine the

nature and extent of injuries to natural resources and to quantify the resulting resource and service losses, providing a basis for evaluating the need for, type of, and scale of restoration actions. The Trustees reviewed data collected from spill response agencies to document natural resource injuries and recovery. The Trustees also reviewed restoration alternatives. Restoration projects will be selected to provide the value to adequately offset the natural resource losses.

Proposed restoration sites will be identified cooperatively by the Federal and State Trustees. The USFWS will own and manage the acquired site(s) as a national wildlife refuge. The site(s) will be open for refuge compatible public recreation including wildlife observation, hunting and fishing.

1.6.1 Public Participation and Response to Comment

Under the CERCLA NRDA regulations and NEPA, the natural resource trustees shall notify the public and any federal, state, and local government agencies that may have an interest in the activities analyzed in the RP. A notice of the availability of the draft RP for public comment was published in *The Daily Herald* on July 1, 2015.

The public comment period was open for 30 days and no comments were received.

Trustees have maintained records documenting the information considered and actions taken during this NRDA process. The records are available at the FWS Chicago Field Office, 230 South Dearborn St., Suite 2938, Chicago, IL 60604.

1.6.2 Responsible Party Involvement

The responsible parties did not participate in restoration planning and implementation.

2.0 PROPOSED RESTORATION ACTION/PREFERRED ALTERNATIVE

The purpose of this section is to describe each of the proposed restoration actions.

2.1 Criteria for Identifying and Selecting the Proposed Restoration Action/Preferred Alternative

The primary goal of restoration is to restore, rehabilitate, replace, or acquire fish and wildlife supporting habitats that were injured or destroyed by the hazardous substance releases from the YCL and KMS.

The CERCLA NRDA regulations (43 CFR § 11.82(d)) require the Trustees to consider the following criteria for evaluating restoration alternatives and for selecting a preferred restoration alternative:

- Technical feasibility.
- Relationship of the expected costs of the proposed actions to the expected benefits from the restoration, rehabilitation, replacement, or acquisition of equivalent resources.
- Cost-effectiveness.
- The results of any actual or planned response actions.
- Potential for additional injury resulting from the proposed actions, including long-term and indirect impacts to the injured resources or other resources.
- The natural recovery period.
- Ability of the resources to recover with or without the alternative actions.
- Potential effects of the action on human health and safety.
- Consistency with relevant federal and state policies.
- Compliance with applicable federal and state laws.
- Public access and potential for fish and wildlife based recreation.

The preferred restoration alternative described in this RP is based on conceptual plans for which some costs have been estimated. The size and design of the recommended restoration actions may change based on additional scientific findings or other factors. If, during implementation, it is determined that significant changes to the selected restoration alternative are needed, additional public review and comment will be sought, as appropriate.

2.2 Description of the Alternatives

The alternatives considered, including the no action and preferred, are discussed in this section.

2.2.1 Alternative A: No Action Alternative

A no action alternative is considered to fulfill requirements under NEPA, and is consistent with the damage assessment process under the CERCLA NRDA regulations. Under this alternative, no action would be taken to restore migratory birds, wildlife and fish and their supporting habitats that were injured from hazardous substance releases to Yeoman Creek, Kress Creek, West Branch DuPage River and adjacent wetlands and uplands, or to replace or acquire the equivalent of the ecological resources lost. The underlying assumption of this alternative is that adequate numbers and diversity of migratory bird species, fish and other wildlife are present within the geographic area, and given adequate time and a stable habitat, recovery of the resources and resource function would occur. This assumption would be completely dependent upon natural processes.

2.2.2 Alternative B: On-Site Restoration

This alternative involves restoring the river, creeks, and associated wetlands and uplands at the YCL and KMS Sites. Wetlands at the YCL have been affected by landfilling activities. On site restoration would restore the riverine habitat and associated wetlands and uplands.

and wildlife. The purchased property would become part of the Hackmatack National Wildlife Refuge and be managed to provide optimal fish and wildlife habitat.

Parcels selected for protection and restoration under this alternative will be compatible with the Land Protection Priorities identified in the Figure 10. Land Protection Priorities for the Proposed Hackmatack NWR; Appendix A: Land Protection Plan; of the U.S. Fish and Wildlife Service's Hackmatack National Wildlife Refuge Environmental Assessment, Land Protection Plan, and Conceptual Management Plan (available at: <https://www.fws.gov/midwest/planning/hackmatack/EA/EAHackmatack-FINAL-10May2012Edited120531.pdf>).

The habitat acquisition and restoration area is located approximately 25 miles west of the YCL and 35 miles north of the KMS. The selected site will be restored and managed as part of the National Wildlife Refuge System and will provide opportunities for wildlife based public recreation, including wildlife observation, hunting and fishing.

3.0 EVALUATION OF THE ALTERNATIVES

3.1 Evaluation of Alternative A: No Action Alternative

The no action alternative relies on natural recovery to restore injured resources and the services provided by those resources and would not create additional injuries. This alternative would not restore migratory bird habitats that have been permanently destroyed by engineered controls at the Sites or injured by hazardous substance releases. The resources permanently impacted by engineered landfill controls would not recover in the foreseeable future. This alternative is technically feasible but would not compensate the public for lost use of resources during the period of injury. There are no costs associated with this alternative and the expected benefits are low. This alternative has no impacts on human health and safety. This proposal is not consistent with relevant federal and state policies regarding restoration of injured natural resources. This alternative complies with federal and state laws. This proposal does not provide any public access or potential for fish and wildlife based recreation. Therefore, the Trustees rejected this alternative.

3.2 Evaluation of Alternative B: On-Site Restoration

The presence of landfill caps and residual contamination in soil and groundwater limits the potential restoration options at YCL. There is also the potential for residual contamination or future pollutant releases to cause injury to trust resources using on site habitats. This alternative is not technically feasible because some of the wetlands and creek habitat have been permanently destroyed by construction of landfill caps and cannot be fully restored. Resources permanently impacted by engineered controls would not recover in the foreseeable future and limited potential exists for expanding existing resources on site. At the KMS, most of Kress Creek and West Branch DuPage River has been restored following removal of contamination, thereby limiting additional restoration

options. There are no acquisition costs associated with this alternative. This alternative has no impacts on human health and safety. This proposal is not consistent with relevant federal and state policies regarding restoration of injured natural resources because sufficient restoration potential does not exist on site. This alternative complies with federal and state laws. This proposal does not provide suitable public access or potential for fish and wildlife based recreation because of the presence of a hazardous waste landfill. Therefore, the Trustees rejected this alternative.

3.3 Evaluation of Alternative C: Off-Site Acquisition and Restoration at Hackmatack National Wildlife Refuge (preferred alternative)

Off-site restoration provides several benefits that are not present in the other alternatives. Implementing this alternative would result in increased water quality and restore and permanently protect fish and wildlife habitat. This alternative will restore fish and wildlife habitat along the riparian corridor of Nippersink Creek or the Kishwaukee River in McHenry County, Illinois. This area is dominated by agricultural land use and migratory birds will benefit from habitat restoration and protection. The FWS will hold title and assume management responsibilities for the site.

Lands acquired, restored, and managed as part of the Hackmatack National Wildlife Refuge would link and expand upon existing conservation areas to benefit migratory birds and other wildlife. The corridors would assist terrestrial migration of small mammals, herptiles, and plants that may be impacted by a changing climate. Goals for the proposed Hackmatack NWR were developed within the framework of the Refuge System's mission statement, the Refuge Improvement Act, the Refuge's primary purposes, and other FWS policy and directives. The goals are intentionally broad statements that describe desired future conditions and guide the management of the Refuge in the interim period and the development of management objectives and strategies for the CCP. They include:

- Protect and enhance habitats for federal trust species and species of management concern, with special emphasis on grassland-dependent migratory birds and protection of wetlands and grasslands.
- Create opportunities for hunting, fishing, wildlife observation and photography, and environmental education and interpretation, while promoting activities that complement the purposes of the Refuge and other protected lands in the region.

This alternative, the potential acquisition and restoration of lands that can provide habitat for migratory birds and other wildlife in the proposed Hackmatack National Wildlife Refuge acquisition area, directs funds toward a project that has already received extensive public review and comment. The U.S. Fish and Wildlife Service conducted extensive scoping, multiple public meetings and presentations, in development of the Hackmatack National Wildlife Refuge Environmental Assessment, Land Protection Plan, and Conceptual Management Plan (USFWS 2012).

This alternative is technically feasible. There is low potential for additional injury resulting from this proposed action. This alternative has no impacts on human health and safety. This proposal is consistent with relevant federal and state policies regarding restoration of injured natural resources. This alternative complies with federal and state laws. This proposal provides suitable public access and potential for fish and wildlife based recreation. The Trustees selected this alternative as the preferred alternative.

3.4 Comparison of Habitat Restoration Actions by Alternative

Alternative	Opportunity to Increase Habitat	Cost per Acre	Probability for Success
A - No Action	None	N/A	Low
B – On Site Restoration	Low	High	Moderate
C - Off Site Hackmatack NWR	High	Moderate	High

3.5 Comparison of Alternatives by Restoration Criteria

Alternative	Technically Feasible	Cost Effective	Injury Potential	Recovery Without Action	Public Health Protection	Policy Consistency	Compliance with Laws	Public Use
A - No Action	Yes	Yes	Low	Low	Yes	No	Yes	No
B – On Site Restoration	No	No	Moderate	Low	Yes	Yes	Yes	Low
C - Off Site Hackmatack NWR	Yes	Yes	Low	Low	Yes	Yes	Yes	High

4.0 LIST OF AGENCIES, ORGANIZATIONS, AND PARTIES CONSULTED FOR INFORMATION

National Oceanic and Atmospheric Administration
 Illinois Environmental Protection Agency
 Illinois Department of Natural Resources

5.0 LITERATURE CITED

U.S. Environmental Protection Agency. 2011. NPL Fact Sheet, Yeoman Creek Landfill

U.S. Environmental Protection Agency. 2014. Kerr-McGee Superfund Sites Website.
<http://www.epa.gov/region5/cleanup/kerrmcgee/index.htm>

U.S. Fish and Wildlife Service. 2012. Proposed Hackmatack National Wildlife Refuge.
Environmental Assessment, Land Protection Plan, and Conceptual Management Plan.
<https://www.fws.gov/midwest/planning/hackmatack/EA/EAHackmatack-FINAL-10May2012Edited120531.pdf>

UNITED STATES FISH AND WILDLIFE SERVICE

ENVIRONMENTAL ACTION STATEMENT

Within the spirit and intent of the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act (NEPA), and other statutes, orders, and policies that protect fish and wildlife resources, I have established the following administrative record and determined that the action of (describe action): land acquired, restored and managed as part of the Hackmatack National Wildlife Refuge.

Check One:

- Is a categorical exclusion as provided by 51 6 DM 2, Appendix I and 516 DM 6, Appendix 1. No further NEPA documentation will therefore be made.
- is found not to have significant environmental effects as determined by the attached environmental assessment and finding of no significant impact.
- is found to have significant effects and, therefore, further consideration of this action will require a notice of intent to be published in the Federal Register announcing the decision to prepare an EIS.
- is not approved because of unacceptable environmental damage, or violation of Fish and Wildlife Service mandates, policy, regulations, or procedures.
- is an emergency action within the context of 40 CFR 1506.11. Only those actions necessary to control the immediate impacts of the emergency will be taken. Other related actions remain subject to NEPA review.

Other supporting documents (list):

Signature Approval:

Edward Kumpf 9-20-18
(1) Originator Date

Lan H. Nord 10/2/18 (2) AD/ARD Date
Carol Wasby 10/5/18 ACTING Regional Director Date