

TRANSITION PLAN




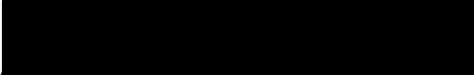
TRANSITION PLAN PREPARED FOR

INCIDENT NAME: Edwardsville Response

DATE PREPARED: 3/19/2022

THIS PLAN IS AGREED UPON AND APPROVED BY THE UNIFIED COMMAND.

APPROVED BY

 _____ Incident Commander	<u>3-19-2022 10:00AM</u> _____ Date
 _____ Federal On-Scene Coordinator	<u>3-19-2022 - 10:00 HRS</u> _____ Date
 _____ State On-Scene Coordinator	<u>3/19/22 1000</u> _____ Date
 _____ Local On-Scene Coordinator	<u>03/19/22 10:00AM</u> _____ Date

Edwardsville Response Transition Plan Approval
3/18/2022

PURPOSE: Outline plan to transition the Edwardsville Release from emergency response to a Marathon managed remediation project. Marathon commits to continuing protection of the public and the environment in a collaborative effort with our agency partners through on-going remediation projects.

This transition plan will stand down the formal Unified Command and formal execution of ICS structure but many of the on-going activities will be continued into the remediation phase.

OBJECTIVES SUMMARY: Edwardsville Response Unified Command identified five objectives as the incident team was stood up. The Unified Command and their support teams have successfully accomplished objectives tied to the emergency. The remaining objectives have been properly managed within the response effort but will continue into project remediation.

Incident Objectives Achieved

- ✓ Ensure safety of the public and responder personnel
- ✓ Identify and contain the leading edge
- ✓ Identify and control the source

Incident Objectives continuing into project remediation

- Ensure safety of the public and responder personnel
- Maximize protection of environmentally sensitive areas
- Control the source, through containment and collection of spilled products where possible and safe

Specific commitments and objectives regarding monitoring and environmental remediation below.

PROJECT REMEDIATION OVERVIEW

Cahokia Diversion Channel and Cahokia Creek

Marathon will maintain a boom presence and perform daily inspections as outlined below. Recoverable free product beyond Div. 4 constitutes an immediate notification to MPL Heartland Area Leadership, Marathon Environmental, US EPA, and IL EPA to address course of action and investigate cause.

Marathon has authority to adjust boom strategy but will maintain personnel, boom, and respond 24/7 through rainfall events of at least ½" over a 24-hour period at the following locations:

- Old Edwardsville Rd (Div. 1)
- Wanda Rd. (Div. 2)
- Oldenburg Rd. (Div. 3)
- Lewis and Clark Historical Site (Div. 4)

Review of past events show ½” of rainfall over a 24-hour period results in an average water level increase of approximately 2 feet. Based on historic minimum channel water levels, a ½” rain event will result in a higher channel level than at the time of release.

The monitoring plan outlined above is intended to remain in place for three rain events. Following each rain event, US EPA, IL EPA and MPL will meet on-site to determine if booming strategies need to be maintained, removed, or updated.

In addition to the monitoring and response outlined above, MPL is committed to the following efforts:

- Marathon will continue water sampling at designated points along the Cahokia Diversion Channel and Cahokia Creek under the oversight of the U.S. EPA and/or IL EPA.
- Marathon will execute a sediment plan addressing poling activities along the channel, implement reconnaissance surveys, and cleanup on the Cahokia Diversion Channel and Cahokia Creek under the oversight of U.S. EPA and/or IL EPA.
- Waste management and disposal will be conducted as required by Illinois rules and regulations in partnership with the IL EPA – Bureau of Land and Bureau of Water.

“Wetland” Land Area

Marathon commits to executing remediation plans in conjunction with the appropriate regulatory agencies in the “wetland” area located near the release site; including but not limited to:

- Marathon will maintain local and contract resources to execute the Wildlife Management Plan including to document, recover, and rehab impacted wildlife in partnership with the U.S. Fish and Wildlife Service and Illinois Department of Natural Resources.
- Marathon will continue to conduct air monitoring around the perimeter of Division 1 and will respond to community odor concerns until all gross impacted soil is removed and then for two consecutive days of no actionable readings.
- Marathon will continue air monitoring of employee and contractors during work at Division 1.
- Marathon will perform soil testing, remediation, waste management and disposal efforts under the direction of the Illinois EPA - Bureau of Land.
- The restoration of the wetland area will be completed in coordination and approval by the U.S. Fish and Wildlife Service, the Illinois Department of Natural Resources, the IL EPA and U.S. EPA