



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

October 2, 2019

Ms. Kimberly Wasserman
Little Village Environmental Justice Organization
2445 South Spaulding Ave.
Chicago, IL 60623

**RE: Former Crawford Power Plant Redevelopment
3501 S. Pulaski Avenue**

Dear Ms. Wasserman:

Illinois Environmental Protection Agency (Illinois EPA) has received your letter regarding the Hilco Redevelopment Partners (Hilco) redevelopment of the former Crawford Power Plant, which is also known as the Exchange 55 development. In response to your letter dated August 15, 2019, Illinois EPA has prepared responses to your questions where applicable; questions outside of Illinois EPA's direct oversight were intentionally omitted. The Illinois EPA coordinated responses with the City of Chicago Department of Public Health (CDPH). To that end, CDPH will be sending a letter addressing questions 1 – 11.

Illinois EPA responses to the Little Village Environmental Justice Organization's questions are below.

- 12. What are the impacts of the coal plant operations on residential neighborhoods north of the site boundary? What initiatives have been taken by Midwest Generation, Illinois EPA and/or the Remedial Applicant (RA) to assess the nature and extent of potential contamination in these areas?**

Based on current soil and groundwater sampling data collected from within the site boundaries, it does not appear on-site soil and groundwater impacts have migrated to the neighborhoods north of the site. As part of enrollment in the SRP, the RA is required to define the extent of contamination on-site.

- 13. What remedial measure will be taken in areas of the site that will not be covered by the physical engineered barrier (concrete, asphalt, parking lots and building)?**

Remedial measures to be taken in areas of the site not covered by engineered barriers include either excavation or in-situ (in-place) remediation, which are actions taken on-site to remediate the contamination. Examples are chemical oxidization, augmented microbial enhancement, aeration and soil blending.

- 14. Is water from the on-site wastewater treatment system being used for dust suppression on the site? If so, is this permitted?**

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Illinois EPA Bureau of Water staff were not previously aware of any treated effluent being used for dust suppression on the site. The Agency will conduct a site inspection to better understand water use at the site and evaluate compliance. To date, no permit has been applied for using treated effluent for dust suppression.

- 15. Is there coal ash in the subsurface of the site? If so, where is it and how will it be addressed as part of the site remediation?**

Coal ash was historically present in certain areas of the site. The Comprehensive Site Investigation Report stated coal ash was removed from the site as part of decommissioning activities (2012-2013). Historical information states fly ash and wet ash was recycled off-site by MSI of Naperville.

- 16. In light of historic coal ash disposal at the site, how does the Illinois Pollution Control Board's June 20, 2019 Opinion and Order in Case 13-15 affect the Illinois EPA's responsibilities in relationship to the site, separate and apart from its SRP-related activities?**

The Illinois Pollution Control Board's holding in PCB13-15 does not necessarily affect this situation. That case was an enforcement case where the Board considered site-specific facts to determine whether Midwest Generation violated the Environmental Protection Act or Board rules. The factual situation at Crawford is substantially different than the Midwest Generation sites considered by the Board in PCB13-15. Therefore, the Illinois Pollution Control Board's holding in that case does not directly impact this situation.

- 17. Has the site hydrology been characterized? If so, can this assessment be shared with the public?**

The site wide surficial geology is comprised of glacial till silts and clays (part of the Wedron Formation geologic description) overlain by urban fill. Urban fill consisted of reworked native soils, slag/cinders, coal, crushed limestone gravel, brick/wood fragments, and topsoil. Underlying urban fill were native clays believed to correlate with the Equality Formation. Depth to groundwater during the 2018 groundwater gauging events ranged from approximately 7 to 23 feet below ground surface. The site hydrogeologic information is detailed in the Comprehensive Site Investigation Report.

- 18. What is the fate and transport of contaminants in groundwater, both now and in the future? What measure will be taken to ensure that any groundwater contaminants will not be discharged into the Chicago Sanitary and Ship Canal (CSCC)?**

Final fate and transport modeling will be required after site assessment activities are completed. Once all site data is received, potential impacts to the Chicago Sanitary and Ship Canal will be evaluated.

- 19. What sampling and remedial measures are planned for the easternmost, waterfront portion of the property?**

Several samples (ES-EP-101-ES-GP-106) have been collected on the eastern waterfront portion of the property. Based on the sampling results, no remedial measures of this area are warranted.

- 20. What are the impacts of the coal plant operations on the CSCC, especially in sediments? What initiatives have been taken by Midwest Generation, Illinois EPA and/or the RA to assess the nature and extent of potential contamination in this waterway?**

Fate and transport modeling is required to be conducted to determine potential impacts to the Chicago Sanitary Ship Canal as part of compliance with 35 Illinois Administrative Code 742. This fate and transport modeling will occur once the assessment activities are completed.

- 21. Because significant quantities of subsurface materials will remain in place under the engineered barrier, what impact will residual contaminants in this material have on groundwater conditions?**

Fate and transport modeling of the contaminants remaining under the barrier is required to be conducted to determine potential impacts that soil may cause to groundwater as part of compliance with 35 Illinois Administrative Code 742. This fate and transport modeling will occur once the assessment activities are completed. Institutional controls that will be in place at the site include the City of Chicago groundwater ordinance, which prohibits installation of potable wells on the property and surrounding properties.

- 22. How will the existence of engineered barriers affect access to subsurface electric transmission structures?**

The Illinois EPA does not regulate access to subsurface electric transmission structures.

- 23. Is the RA still planning to utilize soil management zones? If so, why doesn't this initiative to reduce the toxicity and mobility of contaminants constitute regulated on-site treatment, storage and/or disposal of hazardous wastes?**

On August 23, 2019, Hilco's consultant, V3, submitted a document entitled, *Site Remediation Program/Technical Reports – Response to IEPA Conditional Approval Letter dated July 3, 2019*, stating that the Remedial Applicant plans to use two soil management zones (SMZs) at the site. One SMZ is below the expanded engineered barrier and the other SMZ is outside of the limits of the engineered barrier. The purpose of the SMZs is to allow consideration and approval of on-site solutions to on-site soil contamination without violating the solid waste disposal regulations at 35 IAC 807 or 811-815. The key component in approving an SMZ is that a Comprehensive Site Investigation be conducted, which is the case for this site. On September 20, 2019, the Illinois EPA conditionally approved this document.

- 24. Illinois EPA itself expressed, both in its comments on the Comprehensive Site Investigation Report and in its comments on the Supplement to Comprehensive Site**

Investigation Report, that the frequency of groundwater sampling, the analyses performed on the samples taken, as well as the overall quantity of groundwater monitoring wells installed on Site, are wholly inadequate. Why does Illinois EPA now believe that the groundwater sampling activities area adequate for determining the nature and extent of groundwater contamination and, specifically, whether contamination has/could migrate to the CSCC?

The Illinois EPA required additional groundwater sampling as part of site characterization efforts. As a result, the environmental consultant installed five (5) monitoring wells and analyzed the groundwater samples for Target Compound List analysis. This was in addition to seven (7) monitoring wells installed by the previous environmental consultant. There were no detections in any of the groundwater samples above their respective Class II groundwater remediation objectives.

25. Can Illinois EPA use its authority to require additional groundwater monitoring wells be installed directly adjacent to the CSCC?

If the Illinois EPA believes additional groundwater sampling is required, the Illinois EPA can require the installation of additional groundwater monitoring wells. A select number of groundwater monitoring wells were installed in the proximity of the CSCC and no contaminants exceeding the Class II groundwater objectives were detected. An active ComEd utility corridor is located in the extreme south portion of the site making additional groundwater sampling adjacent to the CSCC impracticable.

26. The CSCC is listed as an impaired water on Illinois' 2018 Section 303(d) list. The section identified as IL GI-03, which borders the Crawford site, is in non-attainment for Fish Consumption (Mercury and Polychlorinated biphenyls) and Indigenous Aquatic Life (Oxygen, Dissolved and Phosphorus [Total]). What steps is Illinois EPA taking to assess the contribution of the Crawford site to the impairment, and to establish additional controls on releases from the Crawford site to address these impairments?

On June 11, 2012, the Illinois EPA issued a violation notice (W-2012-00055) for violations of the groundwater standards for pH, Iron, Manganese, Sulfate, Chloride, Total Dissolved Solids, and Antimony. Under the Compliance Commitment Agreement (CCA) entered on October 24, 2012, the Agency required the Midwest Generation to remove all ash and coal (including fines) from the Crawford property within a year. The sediment from the coal pile run-off pond and the wastewater treatment system equalization basins were also removed. It is not believed that Polychlorinated biphenyls, phosphorous, or any contaminants that would affect the dissolved oxygen were present at this site. Data from the monitoring wells did not detect any mercury. Thus, the Agency does not believe that mercury from the Crawford site contributes to the impairment for Waterbody Segment IL_GI-03.

27. Illinois EPA indicated that there's a process whereby it could perform "split sampling" and run checks on duplicate samples in order to assure the accuracy and

adequacy of the sampling activities that are being performed on Site. Split sampling was said to be employed when either an unaccredited consulting agency is use, or when Illinois EPA has reason to question the validity of the sampling activities.

- a. Given the repeated discrepancies that existed between Illinois EPA characterizations of sampling results and those of V3 Companies, HRE Crawford's consulting agency, how is this not an instance where Illinois EPA has reason to question the validity of the sampling activities?**
- b. If this isn't such an instance, can Illinois EPA provide examples of what an accredited consulting entity would need to do to cause Illinois EPA to question the validity of the sampling results?**

The Illinois EPA does not question the validity of the data collected to date based on the fact that an accredited laboratory has been used to analyze the samples.

Further information about the former Crawford Power Plant site can be found at Illinois EPA's website: <https://www2.illinois.gov/epa/topics/community-relations/sites/hilco/Pages/default.aspx>. Additionally, documents related to this site may be found on Illinois EPA's Document Explorer: <https://external.epa.illinois.gov/DocumentExplorer/>.

If you have other questions, please contact Chris Pressnall, Environmental Justice Coordinator, chris.pressnall@illinois.gov or 217-524-1284.

Sincerely,



John J. Kim,
Director