

August 15, 2019

Alison Arwady  
Interim Commissioner  
Chicago Department of Public Health

Dear Commissioner Arwady,

We extend thanks to the Department of Public Health for sending Dave Graham to attend and present at the Illinois Environmental Protection Agency's Crawford Coal Power Plant meeting on Tues, August 6, 2019. As residents clearly communicated at the community meeting, our community wants to ensure that the state site remediation process includes active participation by community members, a full and complete characterization of site contamination, as well as full and complete characterization of any potential contamination that extends further into the community or the Sanitary and Ship Canal outside of the site boundary, and a remediation that is protective of human health and the environment, now and in the future. As you know, the public health of the Little Village community has been severely and adversely affected by persistent, cumulative impacts from environmental exposure for decades, including from the operations at the former Crawford Coal Power Plant site and ongoing exposure to a multitude of toxins from transportation and industrial facilities overburdening the neighborhood.

We are happy to read in the news that the City of Chicago Chicago Department of Public Health will be doing weekly inspections at the site. As a follow up to Tuesday's meeting, we request the following in service of the public health of the community

1. A detailed daily timeline for work being completed on the site
2. Names and permits of the contractors and subcontractors hired for the remediation of the Crawford Coal Power Plant site, including those handling asbestos
3. Ongoing provision of copies of the violations and inspections on site
4. CDPH to flyer and host local informational events to educate the community at large of the process, in Spanish & English
5. Based on regulatory authority, the creation of rules specific to demolition, remediation, and redevelopment of this specific type of urban coal-fired power plant in advance of the demolition of Fisk such that both processes adhere to strict, protective city rules
6. How will vermiculite-containing substances be removed from the building and site as part of demolition activities? Where are these substances located?
7. How many boilers are located on the site and how will contamination associated with these boilers be addressed?
8. Prior to demolition activities, including the use of torches, is there an assessment of lead-based paint of building components, and how is lead-based paint being abated prior to these activities?
9. Are there any air monitors on the perimeter of the site to assess whether particulate matter is being released off-site? Given the microscopic nature of particulate matter, is



there any other credible method to detect and respond to off-site releases if they are occurring?

- a. If no, we would demand air monitoring along the Crawford Coal Power Plant perimeter and in the yards of the homes closest to the site to ensure the protection of the community at large, as well as on-site air monitoring to ensure the protection of workers
  10. Is there an existing fugitive dust control plan to control dust during the remediation and redevelopment of the site? If so, can this plan be shared with the public?
  11. What provisions are there to notify nearby residents during more intense phases of demolition and remedial activities that have the potential to affect air quality?
  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, IL EPA and/or the Remedial Applicant to assess the nature and extent of potential contamination in these areas?
  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)?
  14. Is water from the on-site wastewater treatment system being used for dust suppression on the site? If so, is this permitted?
  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?
  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 IL EPA's responsibilities in relationship to the site, separate and apart from its SRP-related activities?
  17. Has the site hydrogeology been characterized? If so, can this assessment be shared with the public?
  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 CSSC?
  19. What sampling and remedial measures are planned for the easternmost, waterfront portion of the property?
  20. What are the impacts of the coal plant operations on the Chicago Sanitary and Ship Canal, especially in sediments? What initiatives have been taken by Midwest Generation, IL EPA and/or the Remedial Applicant to assess the nature and extent of potential contamination in this waterway?
  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?
  22. How will the existence of engineered barriers affect access to subsurface electric transmission infrastructure?
  23. Is the Remedial Applicant 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?
  24. IL 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
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on Site, are wholly inadequate. Why does IL EPA now believe that the groundwater sampling activities are adequate for determining the nature and extent of groundwater contamination and, specifically, whether whether contamination has/could migrate to the Sanitary and Ship Canal?

25. Can IL EPA use its authority to require additional groundwater monitoring wells be installed directly adjacent to the Sanitary and Ship Canal?
26. The Chicago Sanitary and Ship Canal is listed as an impaired water on Illinois' 2018 § 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 Phosphorous [Total]). What steps is IL 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?
27. IL 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 used, or when IL EPA has reason to question the validity of the sampling activities.
  - a. Given the repeated discrepancies that existed between IL EPA's characterizations of sampling results and those of V3 Companies, HRE Crawford's consulting agency, how is this not an instance where IL EPA has reason to question the validity of the sampling activities?
  - b. If this isn't such an instance, can IL EPA provide examples of what an accredited consulting entity would need to do to cause IL EPA to question the validity of the sampling results?

We request this information, as this is the first time that a Coal Power Plant in a dense, urban area such as the City of Chicago is being demolished, and the city and state have a unique opportunity to collaborate with the community to ensure well-being and mitigate additional pollution burdens on neighbors who cannot shoulder more.. We want to ensure that the contractors and subcontractors hired have the correct experience, know how, and permits to do said work, and we want to ensure that the community is educated on what is happening on the site to best protect themselves. Closing our doors and locking our windows is an unreasonable ask of community residents who are made to take measures to protect themselves as a result of this project, and it puts the onus of protection on the community residents, instead of compelling protective action from the company doing the work. This approach is not adequate solution for community members, hence our stated requests above. We look forward to your response.

Enclosed please find a list of organizations and individuals that have signed onto this letter in support of the community. Thank you for your time. We look forward to your response.

Sincerely,  
Kim Wasserman  
Little Village Environmental Justice Organization

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Southside Coalition to Ban Petcoke  
People for Community Recovery

CC:

Roberto Perez, CEO, Hilco Redevelopment Partners  
Michael Rodriguez, Alderman, 22nd Ward  
George Cardenas, Alderman, 12th Ward; Chair, Committee on Environmental Protection and Energy  
48 Aldermen of Chicago's City Council  
Mayor Lori Lightfoot, City of Chicago  
Candace Moore, Chief Equity Officer, City of Chicago  
Dave Graham, Associate Commissioner, Chicago Department of Public Health  
President Toni Preckwinkle, Cook County Board of Commissioners  
Alma Anaya, Cook County Commissioner, 7th District  
Celina Villanueva, State Representative, 21st District  
Martin Sandoval, State Senator, 11th District  
John Kim, Director, Illinois Environmental Protection Agency  
Chris Pressnall, Environmental Justice Officer, Illinois Environmental Protection Agency  
Jay Robert Pritzker, Governor, State of Illinois  
Cathy Stepp, Regional Administrator, Region 5, U.S. Environmental Protection Agency  
Nathan Frank, Office of Enforcement and Compliance Assurance, U.S. Environmental Protection Agency  
Alan Walts, Director, Office of Enforcement and Compliance Assurance, U.S. Environmental Protection Agency  
Tammy Duckworth, U.S. Senator  
Dick Durbin, U.S. Senator  
Jesus Garcia, U.S. Representative, Illinois 4th District

