



DEPARTMENT OF PUBLIC HEALTH
CITY OF CHICAGO

September 26, 2019

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

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

Dear Ms. Wasserman:

The Chicago Department of Public Health (CDPH) has received your inquiry regarding the Hilco Redevelopment Partners (Hilco) redevelopment of the former Crawford Coal Power Plant, which is marketed as Exchange 55. CDPH is committed to protecting the health and safety of all people who live in or visit Little Village. We will continue to work with you, Hilco, and the Illinois Environmental Protection Agency (IEPA) to ensure that all applicable laws and regulations are enforced during this redevelopment project.

In response to your letter dated August 15 (and received August 26), 2019, CDPH has prepared answers to the questions and requests that are within our department's scope and authority to address; answers to any other questions were intentionally omitted. Please note, the Illinois Environmental Protection Agency (IEPA) has jurisdiction over its Site Remediation Program (SRP) and CDPH has indicated below the questions under IEPA authority. In addition to the numbered questions which are addressed below, at the conclusion of your letter you also reference residents' concerns that they should close doors and lock windows during active site work. Please be assured that with the safeguards being implemented at the site, such measures are not necessary.

1. A detailed daily timeline for work being completed on the site

CDPH response: Due to the nature and complexity of construction work at the site, CDPH has requested that Hilco publicly post its construction schedule, including all associated activities, on its website (CrawfordStation.com) with weekly updates. Daily updates are not in line with best practices for a project this large, as they would likely require numerous revisions, which would cause confusion.

2. Names and permits of the contractors and subcontractors hired for the remediation of the Crawford Coal Power Plant site, including those handling asbestos

CDPH response: The following contractors are working onsite. Please note this list does not include trades such as electrical, masons, plumbers, dry wall installers, etc.

- Marine Technology Solutions – construction management and environmental safety
- Jenkins Engineering Inc. – civil engineer
- Morgan/Harbor Construction – general contractor
- MCM Management Corp. – asbestos contractor

Attached are the environmental permits submitted to CDPH.

3. Ongoing provision of copies of the violations and inspections on site

CDPH response: All inspection reports and violations can be accessed online through the following links. Inspection reports and violations will continue to be publicly available throughout the project:

- Inspections: <https://data.cityofchicago.org/Environment-Sustainable-Development/CDPH-Environmental-Inspections/i9rk-duva/data>
- Complaint Inspections: <https://data.cityofchicago.org/Environment-Sustainable-Development/CDPH-Environmental-Complaints/fypr-ksnz/data>
- Violations Issued: <https://data.cityofchicago.org/Environment-Sustainable-Development/CDPH-Environmental-Enforcement/yqn4-3th2/data>

4. CDPH to flyer and host local informational events to educate the community at large of the process, in Spanish & English

CDPH response: The City of Chicago's Department of Planning & Development (DPD) and Hilco have participated in numerous public meetings related to the planning, redevelopment, demolition and future construction activities. CDPH has requested that Hilco continue its bilingual outreach to inform the neighborhood of progress and anticipated activities during remediation and construction activities. CDPH has requested that Hilco provide its construction schedule, including all associated activities, on its website (CrawfordStation.com) with weekly updates.

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

CDPH response: The City of Chicago has existing ordinances and rules intended to ensure health and safety during demolition, soil remediation or construction. CDPH will continue to inspect the site as demolition continues, as remediation is completed, and during the various construction phases. Also, the site has been entered into the IEPA's voluntary Site Remediation Program and, as part of this process, IEPA evaluates remediation requirements and controls required to ensure human health and the environment are protected during and after construction.

6. How will vermiculite-containing substances be removed from the building and site as part of demolition activities? Where are these substances located?

CDPH response: During CDPH asbestos inspections and review of asbestos documentation (waste manifests, etc.), vermiculite has not been identified or reported. If such material is encountered, CDPH inspectors and management will ensure appropriate state and federal rules are followed.

7. How many boilers are located on the site and how will contamination associated with these boilers be addressed?

CDPH response: Nine boilers remain within the current structure. The developer completed the onsite regulated waste material mitigation and abatement activities in conformance with applicable federal, state and city regulations, prior to demolition of all structures on site.

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?

CDPH response: All suspected lead-based material, such as piping or dismantled material, is identified and segregated during demolition for appropriate disposal. Limited lead-based surfaces (walls or floors) are present in the building and lead abatement is not required. During demolition, dust control activities such as watering will be used to minimize any dust generated.

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**

CDPH response: Although air monitoring during this demolition project is not required by state or federal law, there are a number of measures that the City of Chicago is undertaking to ensure public health is protected. First, the City is requiring the contractor to perform frequent watering to prevent the emission or dispersion of dust, and is performing inspections of the worksite to make sure this requirement is met. Secondly, the City requires the contractor to use a street sweeper to manage dust on vehicular travel paths and water to reduce dust dispersion. In addition, CDPH inspectors will continue to inspect and monitor site activities to ensure visible dust does not cross the site boundary.

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?

CDPH response: CDPH has requested a copy of the fugitive dust control plan for public release.

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?

CDPH response: CDPH has requested that Hilco provide its construction schedule, including all associated activities, on its website (CrawfordStation.com) with weekly updates. CDPH has recommended that Hilco distribute multi-lingual flyers for nearby residents in advance of major activity.

We share your concern about Chicago's environment and are dedicated to ensuring that all of the city's residents have a healthy place to live.

Sincerely,

A handwritten signature in black ink that reads "Allison Arwady, MD, MPH". The signature is written in a cursive, flowing style.

Allison Arwady, MD, MPH
Acting Commissioner
Chicago Department of Public Health