



# Illinois Environmental Protection Agency

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JB Pritzker, Governor

James Jennings, Acting Director

December 1, 2025

Attn: Mr. Curt R. Bailey  
RMW CRG Quantum Shore Ground Tenant LLC  
350 West Hubbard Street  
Chicago, Illinois 60654

Refer to: 0316515061/Cook County  
Chicago/USX South Works (a.k.a. US Steel Southworks)  
Site Remediation/Technical

Dear Mr. Bailey:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the document titled *Comprehensive Site Investigation Report / Remediation Objectives Report / Remedial Action Plan ("CSIR/ROR/RAP")* (received October 15, 2025/Log Number 25-80437), as prepared by Pioneer Engineering & Environmental Services, LLC regarding the USX South Works site. Based on the Illinois EPA review, the above-mentioned document is conditionally approved with the following conditions:

1. Soil, groundwater, and soil gas sampling has been performed across the 440-acre property to investigate the general site conditions. Exposure pathway exclusion has been evaluated at this time using the location and number of samples collected across the entire site. Illinois EPA understands that the larger 440-acre property will be split into various areas receiving separate No Further Remediation (NFR) Letters corresponding to future development phases. Prior to activities associated with final development of a phase area (e.g., infrastructure development, final grading, and/or construction), a RAP Addendum for the area must be submitted for review and approval detailing: (i) any Recognized Environmental Conditions (RECs), including historical RECs, identified in the development phase area and (ii) investigation and remedial activities performed within the development phase area to demonstrate whether any additional investigation or remedial actions are necessary before a NFR Letter can be issued.

2. The indoor inhalation exposure route has been evaluated at this time using the distribution of groundwater and soil gas samples across the entire 440-acre remediation site. As forthcoming development plans become more apparent, additional sampling may be necessary to ensure the indoor inhalation exposure route is fully evaluated and addressed for each development phase area that will receive a NFR Letter. A RAP Addendum must be submitted for review and approval prior to the construction of any permanent buildings in a development phase area that are designed for human occupancy. The RAP Addendum must describe in detail (i) a building control technology (BCT) to mitigate the potential risk for vapor intrusion or (ii) any additional soil gas or groundwater sampling needed to evaluate the indoor inhalation exposure route.
3. The pH in sample SB96 (7-10') is characteristically hazardous based on the corrosivity criterion. The characteristically hazardous sample result must be addressed pursuant to 35 Illinois Administrative Code (35 IAC) 742.305(d) prior to issuance of a NFR Letter for the area. Prior to final development activities occurring on the parcel, a RAP Addendum must be provided for review and approval to delineate the characteristically hazardous pH and describe remedial actions including confirmation sampling to be performed to address the area of this sample location.
4. Section 3.4 of the *RAP* proposes that "imported soils used as structural fill be sampled at a rate of one [Target Compound List] sample per 2,500 cubic yards to confirm compliance with applicable Tier 1 [soil remediation objectives]." Until the sources for imported fill material have been determined, the Illinois EPA maintains that a standard sampling rate of one (1) Target Compound List (TCL) sample per 500 cubic yards per material source be utilized for all imported fill material. The Illinois EPA will consider a lesser sampling rate for structural fill for each source site based on additional information on said sources.
5. Please note that uncontaminated crushed concrete generated on-site may be used as structural fill material (excluding engineered barrier material) at the remediation site in accordance with Section 3.160 of the Environmental Protection Act.
6. Section 3.7 of the *RAP* describes the proposal for Soil Management Zones (SMZs) to be implemented within each development phase area that will be obtaining separate NFR Letters. As noted in Section 3.7 of the *RAP*, no soils may be relocated between any two or more SMZs located in separate development phase areas, and soils not meeting the requirements of 35 IAC 742.305 may not be consolidated/relocated as part of an SMZ. In addition, contaminated soil may not be relocated to areas where TCL analysis identified no exceedances of Tier 1 residential objectives. Once the boundaries of any given SMZ are defined, a RAP Addendum which identifies in detail where soil relocation is permissible must be submitted to Illinois EPA for review and approval prior to any final development activities in the development phase area.
7. The site investigation identified vinyl chloride concentrations at monitoring well MW-102D in excess of Tier 1 groundwater ingestion objectives for Class II groundwater.

Section 2.5.3.3 of the *RAP* indicates that this groundwater impact might be addressed through either in-situ remediation or modeling supported by additional sample analysis at this location. Prior to issuance of an NFR Letter for this area, a RAP Addendum must be submitted for review and approval, specifying details on how the vinyl chloride will be addressed.

8. The Illinois EPA conditionally approves the hybrid slurry wall system as an alternative barrier in accordance with 35 IAC 742.1105(d) in support of a Tier 3 proposal to exclude the soil migration to surface water pathway pursuant to 35 IAC 742.925. Please note the following conditions of this approval:
  - a. An adequate number and location of monitoring wells must be proposed on the interior and exterior of the slurry wall to monitor the performance of the full perimeter. This must include a proposal identifying where nested wells are necessary for measuring the vertical extent of the water column, including locations where deeper impacts were identified or additional depth coverage is needed to evaluate Total Petroleum Hydrocarbons (TPH) concentrations observed below the currently proposed water table wells. In addition, the proposal should include pumping wells sufficient to manage expected mounding of groundwater once the slurry wall is installed. Pumping wells must be operated to minimize interaction with shallow soil contamination and to prevent overtopping of the slurry wall.
  - b. Slurry wall efficacy will be monitored for a minimum of 30 years. Quarterly monitoring events will occur for the first five (5) years of monitoring, followed by semi-annual (twice yearly) monitoring events for the remaining years. If exceedances of applicable surface water quality standards (SWQSS) or attenuation objective of 4 mg/L TPH are identified at interior monitoring wells, subsequent sampling events will revert to a quarterly basis. If three (3) consecutive years without SWQS or TPH exceedances have been achieved, the program may return to semi-annual monitoring.
  - c. Groundwater samples collected from all wells at the permeable reactive barrier (PRB) gates must be analyzed for BTEX (benzene, toluene, ethylbenzene, and xylenes), naphthalene, vanadium and TPH.
    - i. Once an impact is identified at an interior PRB monitoring well exceeding applicable trigger criteria (i.e. exceedance of SWQS or attenuation objective), a confirmation sampling event for the interior PRB monitoring well must be performed within 30 days of the previous event.
    - ii. If an exceedance of any of these constituents is confirmed at an interior PRB monitoring well at the PRB gates, then an expanded list of contaminants will be analyzed during subsequent sampling events on a quarterly basis. This expanded list will include contaminants which were identified to have

exceeded Class II soil component to the groundwater ingestion (SCGI) soil remediation objectives. Any additional constituents on the expanded list of analytes should be sampled until analysis at an exterior well shows non-detection of a given constituent for 3 years of consecutive sampling events and concentrations are below the trigger criteria at interior wells.

- d. The remedial applicant and/or the property owner at the time one or more of the following trigger conditions occur, will provide the Illinois EPA, for review and approval, a summary memorandum of findings and proposed response measures within 45 days after the occurrence of each "trigger" condition: (1) one or more exceedances of applicable SWQSs or attenuation objective in interior and/or exterior PRB wells, (2) any other evidence of declining PRB reactivity, (3) hydraulic conditions that require corrective action, or (4) slurry wall deterioration that requires repair or corrective action.
  - e. If an exceedance of the SWQS is observed at an exterior well for any constituent, a work plan to address exceedance(s) must be provided within 45 days.
  - f. Transducers at all gauging wells around the slurry wall must be operated until all monitoring has ceased.
9. The Tier 3 Impractical Remediation proposal described in Section 2.6 of the *ROR* for existing TPH impacts outside of the proposed slurry wall system boundary is approved contingent on the application of the conditions outlined in Comment 8 above. No further action is required with respect to these impacts pursuant to 35 IAC 742.920. This approval shall only apply so long as the physical constraints and/or access limitations remain intact/present within the impractical remediation areas as depicted on the site base map.
10. The Tier 3 Exposure Route Exclusion proposal based on an incomplete pathway described in Section 2.5.3.1 of the *ROR* is conditionally approved. In accordance with Comment 1 above, the sufficiency of soil and groundwater data in each development phase area receiving an NFR Letter will be further evaluated with respect to any RECs and/or corresponding remedial actions performed to date within the area. Additional data may be requested in the form of a RAP Addendum in order to further support the assertion that contaminant migration from soil to groundwater is an incomplete pathway for each applicable contaminant. Furthermore, contaminants exceeding objectives for the SCGI exposure route on Parcel 17 (Phase I IQMP Development), will be included in an expanded list of analytes as part of the long-term monitoring at the slurry wall system's PRB gates in accordance with Comment 8c(ii)
11. The proposed Tier 3 alternative engineered barrier designs described in Section 3.4 of the *RAP* have been approved for use across the remediation site to exclude exceedances of the soil ingestion and outdoor inhalation exposure routes. If future data indicates higher concentrations of contaminants exceeding soil ingestion/inhalation pathways are

present in a development phase area, or additional exceedances of objectives for the outdoor inhalation of vapors are identified, a submittal must be provided to the Illinois EPA to reevaluate the efficacy of the alternative barriers to manage those impacts. Revision to the barrier designs for alternative or conventional clean-fill barriers may be necessary in this event. Additionally, any deviation from the proposed construction methods or material specifications must be approved prior to the installation of the alternative barrier.

12. Section 1.5.1 of the *CSIR* indicates that "certain areas may be redeveloped with land uses that would be considered residential... and in those cases, an amended report(s) comparing results to residential standards will be issued once those property uses and areas are defined." Amendments to the combined reports for residential land use evaluation must be submitted to the Illinois EPA for review and approval prior to construction activities beginning at a given development phase.

Please provide the Illinois EPA with two (2) paper copies and one (1) electronic copy of any future information submitted regarding the above referenced site. The Illinois EPA also requests not less than ten (10) business days notification of all site investigation and remedial activities in order to coordinate oversight.

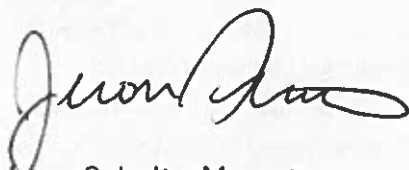
If you have any questions, please utilize the following Illinois EPA points of contact assigned to the USX South Works site:

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Sincerely,



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