EPA Region 5 Records Ctr.
230146

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

MEMORANDUM

DATE: MAR 07 2005

SUBJECT: **ENFORCEMENT ACTION MEMORANDUM** - Request for a Non-Time-Critical Removal Action at the 2800 South Sacramento Avenue Site, Chicago, Illinois

FROM: Thomas G. Williams
Remedial Project Manager

THRU: Linda M. Nachowicz, Chief
Emergency and Enforcement Response Branch

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this action memorandum is to request and document approval of a non-time-critical removal action at the 2800 South Sacramento Avenue Site ("Site") located in Chicago, Illinois. The Site consists of both the 24-acre property on which the facility operations occurred (Main Site) and the residential area surrounding the 24-acre property at 2800 South Sacramento Avenue (Residential Area). The United States Environmental Protection Agency (U.S. EPA), has determined that the appropriate response action at the Main Site is the construction of a 24 inch minimum gravel cap over the 24-acre property and remediation of the polynuclear aromatic hydrocarbons (PAH)s in the Residential Area to 10 parts per million (ppm) (benzoapyrene equivalents). This action is necessary to abate the continuing imminent and substantial threat to public health and the environment from potential exposure to hazardous substances at the Main Site, including volatile organic carbons (VOC)s, and PAHs, along with PAHs in the Residential Area. The Agency has determined that this response action should be conducted as a removal due to the actual or potential exposure of nearby human populations to hazardous substances from the Site. Since at least a six-month planning period is available before on-Site activities must begin, however, the proposed action would be a non-time critical removal.

II. SITE CONDITIONS AND BACKGROUND

U.S. EPA's response at the Site will be a non-time critical action (CERCLIS ID# ILD051053692).

A. SITE DESCRIPTION

1. Removal Site Evaluation

A Removal Site Evaluation was performed on November 1,1993 by the On Scene Coordinator (OSC) and the Remedial Project Manager. Based on this inspection the OSC determined that a time critical removal was not warranted at the Main Site. The OSC determined for the Residential Area that corrective actions should be implemented to address potential health hazards from chronic exposure to residential soils contaminated with PAHs.

2. Physical Location

The Site is located on the west side of Sacramento Avenue between 31st Street and 27th Street (Figure 1). The United States Geological Survey (USGS) reference for the Site location indicates that it is situated in the West ½ of the Southwest 1/4 of Section 25, Township 39 North, Range 13 East of the Third Prime Meridian on the Englewood 7.5 Minute Quadrangle. The Site encompasses 24 acres; 22 acres of the property are owned by the Sacramento Corporation, and a 2-acre parcel to the south which is owned by the Palumbo Corporation et al.

The Site is situated amidst a multi-use area that includes residential, commercial, manufacturing, governmental, and industrial establishments. The Cook County Correctional Facility is located across from the Site, on the east side of Sacramento Avenue. Residential property/buildings and the Atkinson, Topeka & Santa Fe railroad line adjoin the Site along the north and west property boundaries. Residential homes are also located across from the north portion of the eastern property boundary (on the east side of Whipple Avenue). The south side of the Site is bounded by the No. 3050 Chicago Fire Department, the Bureau of Support Services, and by vacant land owned by the Palumbo Corporation et al. Residential homes are present on the west side of South Albany Avenue along the southwest quadrant of the Site. The Chicago Sanitary and Ship Canal is located approximately 1,500 feet south of the Site.

In Illinois, the low income percentage is 25 and the minority percentage is 27. To meet the Environmental Justice (EJ) criteria, the area within 1 mile of the Site must have a population that's twice the state low income percentage or/and twice the State minority percentage. That is, the area must be at least 50% low-income or 54% minority. At this site, the low income is 64% and the minority is 84% as determined by Arcview or Landview III EJ analysis. Therefore, this Site does meet the region's EJ criteria based on demographics identified in "Region 5 Interim Guidelines for Identifying and Addressing a Potential EJ Case, June 1998".

3. Site History

The Main Site formerly housed several manufacturing-related buildings including a large warehouse, smaller storage sheds, an enclosed tank area that included 35 storage tanks, and an office building. Manufacturing, storing and distribution of asphalt roofing products were conducted on the property from at least 1918 until 1982. All buildings have been demolished and removed from the Main Site. Most of the Main Site is covered with a 24 inch gravel cap over the 24-acre property with the exception of property owned by the Palumbo Corporation. The gravel

cap was placed on the Main Site in 1999 in conjunction with improving the drainage and sewer system.

In 1989 the Illinois Environmental Protection Agency (IEPA) completed a Preliminary Assessment. In 1991 and 1992, in order to gain information for Hazard Ranking System (HRS) Scoring, the IEPA conducted inspections and sampling at the Site, which resulted in submission of a Site Screening Inspection Report in September 1991 and an Expanded Site Inspection Report in 1992. These investigations included collection and analysis of 15 samples from residences near the property, a number of samples of highly contaminated materials on the property, and one sample of soil from the bank of the inlet to the Sanitary and Ship Canal near the pipeline from the Main Site. The analytical results indicated elevated levels of PAHs in both the Residential Area and the Main Site.

On September 20, 1996, and October 22, 1996, Allied Signal, now Honeywell, and Celotex, respectively entered into an Administrative Order by Consent (AOC) with the U.S. EPA, Region 5, pursuant to Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) to undertake actions to produce an Engineering Evaluation/Cost Analysis (EE/CA) to address contamination at the Main Site and Residential Areas.

Prior to the AOC in October 1996, ERM-North Central, Inc. (ERM) executed a residential area sampling program (hereinafter referred to as the Phase I Residential Area Sampling and Analysis Program (RASAP) on behalf of the Respondents. The Phase I RASAP encompassed over 100 soil samples collected from 57 residential properties located at varying distances from the Site. Composited surface soil samples were collected from each sampled property.

After the AOC was executed in November 1996, the first investigation program that was performed was the Main Site field investigation. Figure 2 shows the locations of the soil borings from which soil samples were collected during the Main Site field sampling program. In October 1997, a report entitled "Data Report for the Engineering Evaluation and Cost Analysis of the 2800 South Sacramento Avenue Site" (Data Report) was submitted to the U.S. EPA. This report presented the findings and analytical data generated from the Main Site investigation, and contained information on surrounding land use, and Site background. The data from the Main Site investigation also resulted in the generation of the report entitled "Main Site Risk Assessment for the 2800 South Sacramento Avenue Site," (Risk Assessment), October 1998. No additional investigatory activities have been performed at the Main Site.

Two phases of residential area investigation were performed after the execution of the Main Site field investigation program based on the "Residential Area Conceptual Work Plan," May 1997. The findings and analytical data from these investigations are presented in the " Phase II Residential Area Sampling Report," August 1998, and the "Phase III Residential Area Sampling Report,", June 1999.

4. Release or Threatened Release into the Environment of Hazardous Substances or Contaminants

The Data Report determined the following contaminants were found at high concentrations at the Main Site: VOCs and, PAHs. VOCs were highest at the southwest area of the Site at a depth of 0 to 0.5 feet at concentrations of 83 and 25 parts per million (ppm). At deeper depths that ranged from 8 to 18 feet the concentrations are much higher and are primarily located in the central west portion of the Site with a concentration as high as 862 ppm. See Figures 3 and 4,

respectively. PAHs (benzoapyrene equivalents) at a depth of 0 to 0.5 feet were highest at the northern and southern areas of the Site with a concentration as high as 139 ppm. This trend continues at 1 to 2 feet with a concentration as high as 421 ppm. This trend continues at depths of primarily 8 to 10 feet with a concentration as high as 3,236 ppm. See Figures 5, 6, and 7.

Residential neighborhoods to the northeast of the Site are contaminated with PAHs. The neighborhood to the southeast has elevated levels of PAHs as well but will require additional sampling to determine whether or not it requires cleanup. Contamination in one of the residential yards to the northeast was as high as 473 ppm, PAHs. The contamination is highest in this neighborhood, because the highest windrose (the direction that the wind blows most frequently) is to the northeast. See Figure 8. The neighborhood four blocks west of the Main Site was sampled to determine PAH background concentrations for the residential neighborhoods. The high and low concentrations were 13.05 and 0.32, respectively. The mean value was determined to be 3 ppm plus or minus or 1 ppm. The background concentration was determined to be 4 or 5 ppm benzoapyrene equivalents because "spike" values in excess of 10 ppm were observed.

5. NPL Status

The Site is not currently on the National Priorities List (NPL). However, U.S. EPA collected data during previous investigations and the data indicated that the Site would score high enough on the Hazard Ranking System to qualify for listing on the NPL. The preliminary Hazard Ranking System site score of 77 was based on air, soil, and to a lesser extent surface water pathway to the Ship and Sanitary Canal.

B. Other Actions to Date

1. Previous Actions

U.S. EPA has conducted no prior removals at the Site. Illinois EPA conducted several small scale investigations and an Expanded Site Assessment. Based on this information and the October 1996, ERM-North Central Report on November 1, 1996, Allied Signal, now Honeywell, and Celotex entered into an AOC with the U.S. EPA to conduct an EE/CA.

2. Current Actions

Honeywell contracted with Parsons to perform an EE/CA which was released to the public in September 2004. On November 9, 2004 a public meeting was held at the Auditorium of the West Side Technical Institute, 2800 S. Western Avenue, Chicago, Il, to present the proposed Alternative, Alternative 2, which consists of 2 foot minimum gravel cap for the Main Site, along with institutional controls and Alternative 3 for the residential area which consists of remediating at least 32 homes to10 ppm benzoapyrene equivalents and institutional controls. Oral comments were taken at the meeting and written comments were accepted from October 26, 2004 until November 26, 2004. No change in the preferred Alternatives was made based on comments provided by Alderman Cardenas, and others.

C. Role of State and Local Authorities

1. State and Local Action to Date

As stated previously, Illinois EPA conducted several small scale investigations and an Expanded Site Assessment.

On June 11, 2004, a Health Consultation Report for the Site was released by the U.S. Department of Health and Human Services. The health investigation had been performed under a cooperative agreement between the Illinois Department of Health and the Agency for Toxic Substances and Disease Registry. The report recommended the following:

> That U.S. EPA remediate contaminated soil to reduce the potential for exposure. Residents in the area can reduce their exposure to the PAHs in the soil by maintaining good ground cover (e.g. grass), thoroughly washing any vegetables grown in the soil, washing hands, and removing shoes before entering the home to reduce tracking.

2. Potential for Continued State/Local Response

U.S. EPA expects IEPA will not assist in implementing the response actions proposed herein as well as any further action deemed necessary to control the release and potential release of hazardous constituents at the Site.

III. THREATS TO PUBLIC HEALTH or WELFARE and the ENVIRONMENT

In accordance with Section 300.415 (b)(2) of the National Contingency Plan, U.S. EPA must evaluate certain factors to determine if a removal action is the appropriate response to a situation involving hazardous substances. After analyzing the specific factors set forth below, U.S. EPA has concluded that a non-time critical removal action should be conducted to control the release of hazardous substances from the Site. U.S. EPA's actions are necessary to protect human populations, wildlife, and the environment.

A. Threats to Public Health or Welfare

The primary exposure pathways with the Main Site and Residential Area are direct contact (dermal and ingestion) with contaminated surface soil. Based on the findings of the Risk Assessment, estimated carcinogenic risks for each human receptor population were 7×10^{-4} for the Main Site and 1.8×10^{-4} for the Residential Area for dermal and ingestion exposure to contaminated soil.

Drinking water is not a problem because all residents are supplied water by the City of Chicago.

B. Threats to the Environment

No assessment was made for risks to the environment because of the highly urban nature of the Site.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the hazardous substances on-Site, the continued potential release of these substances into the potential human pathway identified in the Risk Assessment, actual or threatened releases of hazardous substances from this Site may present an imminent and substantial endangerment to public health or welfare if not addressed by implementing the response action selected in this Action Memorandum.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Action

1. Proposed Action Description

The Proposed Action consists of a two foot minimum gravel cap for the Main Site and deed restrictions on the entire Main Site (to prevent residential development of the Main Site and to require all current and future owners to keep the gravel cover intact) and for the residential area, remediating at least 32 homes. Twenty-two acres of the 24 acre Main Site already has more than two feet of gravel on it. The two acres that doe not are the Palumbo property. At least two feet of gravel will be placed on this property to complete the remedy on the Main Site. Additional sampling will be performed in the residential area within the boundary set by Whipple Avenue, Sacramento Avenue, 28th Street and 26th Street. The purpose of this sampling is to determine whether contamination exceeds the cleanup goals of 10 ppm, benzo(a)pyrene equivalents. Remediation shall entail the removal of impacted soils down to a depth of 1 foot and replacement with clean soils. Soils removed from the impacted residential properties shall be disposed of at a U.S. EPA approved landfill. The residential area to the south west of the Main Site bounded by 28th Street, Troy Street, 31st Street and the western Main Site boundary will be sampled to determine if the PAH contamination can be linked to the Main Site. If PAH levels in the soil can be linked to the Main Site, then residential properties with soils that have concentrations of PAHs that exceed the cleanup objective of 10 ppm, benzo(a)pyrene equivalents shall be remediated as previously described.

The response actions described in this action memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the Site which pose an imminent and substantial endangerment to human health and the environment. These response actions do not impose a burden on affected property. In accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 117, U.S. EPA finalized the EE/CA in September 2004 and established a public comment period which ended on November 26, 2004 to allow interested parties to comment on the EE/CA. The Responsiveness Summary (Attachment III) documents the U.S. EPA's response to comments received during the comment period and at the November 9, 2004 public meeting. These comments were evaluated prior to, and were considered in the determination of, the non-time critical removal action for the Site.

2. Contribution to Remedial Performance

The proposed non-time critical removal action is expected to significantly reduce the long-term threats associated with the Site, including the threats of ingestion of, inhalation of, and direct contact with the hazardous substances at the Site.

Drinking water is not a problem because all residents are supplied water by the City of Chicago.

3. Description of Alternative Technologies

The EE/CA evaluated, based upon their relative technological and cost attractiveness, only two technologies for the Main Site, an engineered barrier or cap, and a cap along with hot spot removal. Three different types of covers were evaluated. The EE/CA only evaluated excavation and disposal for the Residential Area.

The following removal action technologies were evaluated in the EE/CA:

- Access Control, Main Site
- 1.5 foot Clay Cap, with 6 inch soil/ grass cover, Main Site
- 2 foot minimum gravel cover, Main Site
- Asphalt Cover, Main Site
- 3 - foot Clay Cover, with Hot Spot Removal, Main Site
- Excavation and Off-Site Disposal, Residential Area

4. Engineering Evaluation/Cost Analysis (EE/CA)

As noted in Section II.B.2, an EE/CA was released by U.S. EPA in September of 2004. When evaluating the most appropriate response for a site, an EE/CA must consider the criteria of effectiveness, implementability and cost. Based upon these criteria, sampling results and the Risk Assessment, a 2 foot gravel cover is the preferred Alternative for the Main Site. Remediation of the residential area will be to 10 ppm, benzo(a)pyrene equivalents.

All of the cover technologies reduce human health risk equally by creating a barrier that eliminates human health exposure if properly maintained. U.S. EPA anticipates that minimal maintenance will be required for the gravel cover. The human health risks eliminated by each of the cover technologies are direct contact, ingestion and inhalation of contaminants. The cost of the gravel cover alternative is $270,000 because 22 acres have already been covered with two feet of gravel. The 3 - foot Clay Cover, with Hot Spot Removal costs $48.6 million, the asphalt cover would cost $5.6 million, and the 1.5 foot clay cap, with 6 inches of soil/grass cover would cost $328,000. Therefore, the gravel cover alternative is the most cost-effective alternative. Furthermore excavation of the contamination at the Main Site would significantly disrupt the local neighborhood due to excessive truck traffic and other construction impacts.

EPA selected the cleanup level for removal of PAHs at the residential area based on the risk assessment. A cleanup level of 10 ppm will achieve a carcinogenic risk level to children ingesting or inhaling contaminants remaining in soils of 5.8×10^{-5}, well within the EPA's acceptable exposure levels for individuals as specified in the National Contingency Plan (40 CFR Section 430(e)). The background concentration in the Residential Area was determined to be approximately 5 ppm which has a correlating risk of 2.9×10^{-5}. The difference in the level of exposure risk between cleanup to 10 ppm and cleanup to background, 5 ppm, is only 2.9×10^{-5} and that difference is not statistically significant. However, the cost difference between the two action levels is significant ($420,000). Therefore, U.S. EPA selected a remediation level of 10 ppm because it is more cost-effective, less disruptive to the local area and it is protective of human health and the environment.

5. Applicable or Relevant and Appropriate Requirements (ARARs)

There are no ARARs which apply to the removal action at the Main Site. Pursuant to Section 300.415 (j) of the NCP, the disposal of the soil in the Residential Area will comply with Federal and State ARARs including RCRA's requirements regarding transportation of hazardous

waste and land disposal restrictions. Another TBC is Section 11-4-1500 of the Chicago Municipal Code that addresses waste management actions within the City of Chicago. A complete list of potential ARARs for the Site is provided in Table 3.1 through 3.4 of the EE/CA and is Attachment 5 to this Action Memorandum.

6. Project Schedule

Design and contractor procurement for the non-time critical removal action are expected to take approximately 12 months. The primary components of the non-time critical removal action are expected to be installed during approximately one six-month construction season.

7. Post-Removal Site Control

Consistent with Section 300.415 (l) of the NCP, it is anticipated that the Potentially Responsible Parties (PRP)s for the Site will perform all required post-removal site control activities required by the removal action, with EPA oversight.

B. Estimated Costs

Design	$ 220,799
Construction	
- Gravel Cap	$1,781,120
- Site Work	$ 426,867
- CM/CQA/Eng.	$ 555,196
O&M	$ 12,000
Contingency	$ 110,399
	$ 3,106,381

However, because only 2 acres of the 24 acre Main Site are not currently covered with gravel, the cost to cover the other 2 acres is estimated at $270,000.

Costs for the Residential Area are:

Design	$ 420,000
Construction	
- Contractor Mob	$ 24,000
- Soil Excavation	$ 100,000
- Place Soil	$ 44,000
- Plant Trees	$ 46,000
CM/CQA/Eng.	$ 226,000
Contingency	$ 20,000
	$ 880,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD THE ACTION BE DELAYED OR NOT TAKEN

If the proposed action is not taken or delayed, human receptors will continue to be exposed to PAH contamination.

VII. OUTSTANDING POLICY ISSUES

This response action implicates no outstanding policy issues.

VIII. ENFORCEMENT

The PRPs for the Site were identified early in the process. Honeywell has indicated a willingness to perform the removal. Information concerning the confidential enforcement strategy for this Site is contained in the Enforcement Confidential Addendum (Attachment II).

IX. RECOMMENDATION

This decision document represents the selected non-time critical removal action for the Site, located in Chicago, Illinois. This decision document was developed in accordance with CERCLA as amended by SARA; the selected response action is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site. Attachment IV identifies the items that comprise the Administrative Record, upon which the selection of the non-time critical removal action is based.

Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a non-time critical removal. I recommend your approval of the proposed removal action.

APPROVE: Richard C. Karl Date 3-7-05
Richard C. Karl, Director
Superfund Division

DISAPPROVE: _____ Date _____
Richard C. Karl, Director
Superfund Division

Attachments:
I. Site Location Figures
II. Enforcement Confidential Addendum
III. Responsiveness Summary
IV. Administrative Record Index
V. Table of ARARs

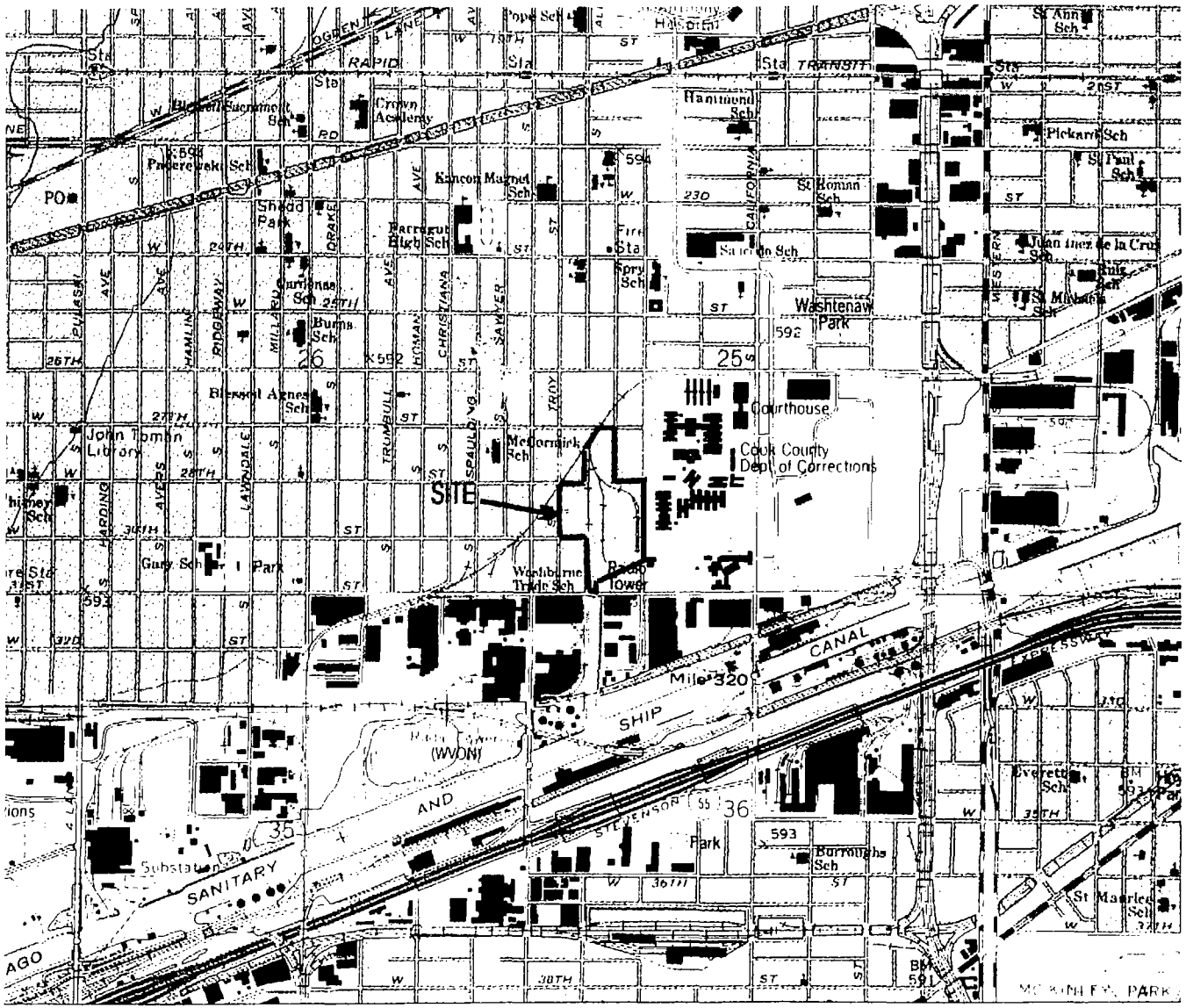
cc: David Chung, U.S. EPA, OEM
Mike Chezik, U.S. DOI

BCC PAGE

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

(REDACTED 1 PAGE)

ATTACHMENT I



VICINITY MAP

SOURCE: 7.5 MINUTE QUADRANGLE MAP OF ENGLEWOOD, IL. DATED 1963, PHOTOREVISED 1972 & 1980.

SITE PLAN

2000 0 2000

SCALE IN FEET

PARSONS ENGINEERING SCIENCE, INC.

SITE LOCATION MAP

AlliedSignal, Inc./The Celotex Corporation

FIGURE 1

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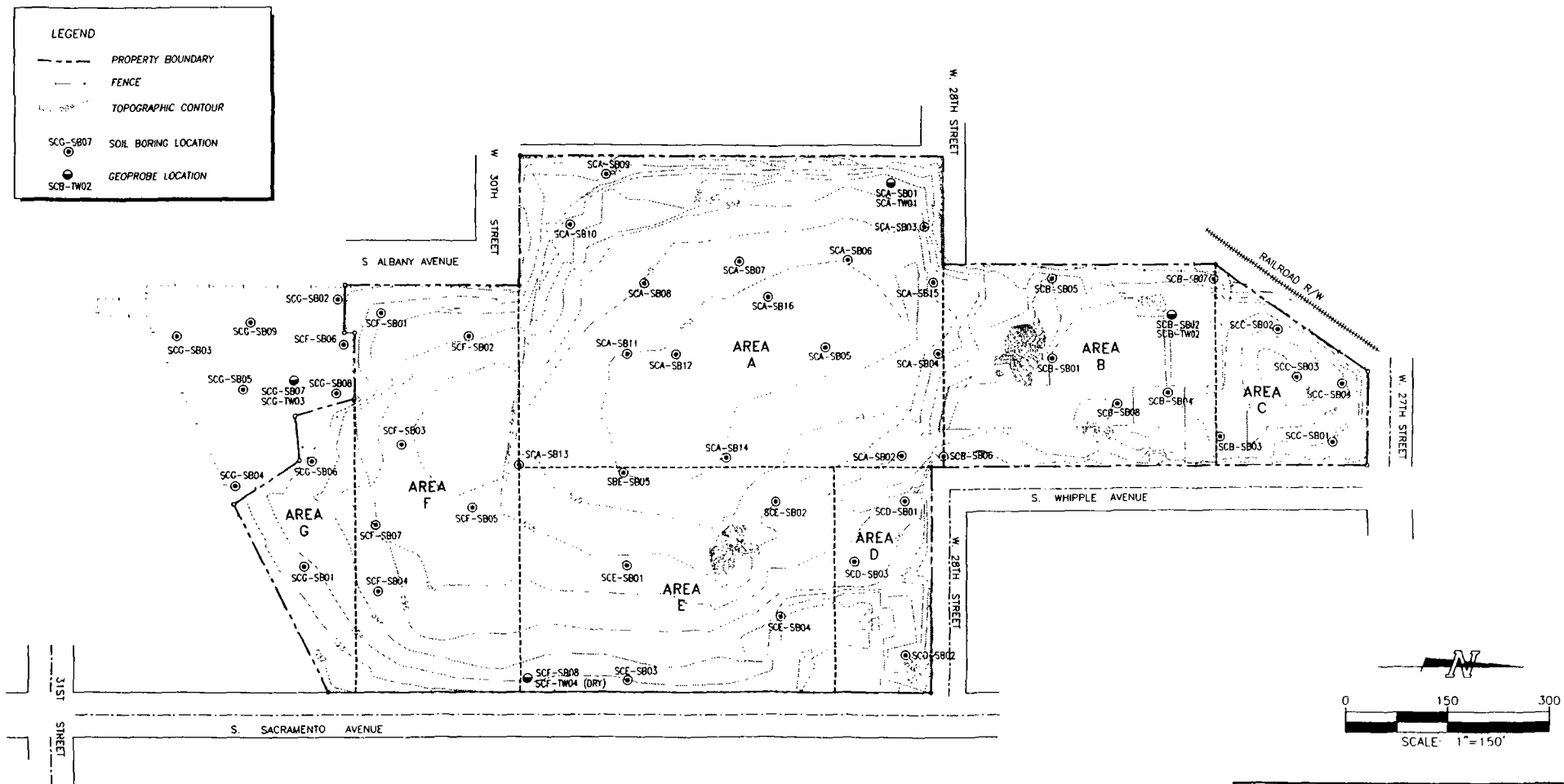

SOURCE: SITE MAP BASED ON FILE No. WAS BASED ON SITE DRAWING PROVIDED BY WESTSHORE ENGINEERING AND SURVEYING, INC (FILE No. WS-440-11, 5-16-96)

DATE. 10/16/97
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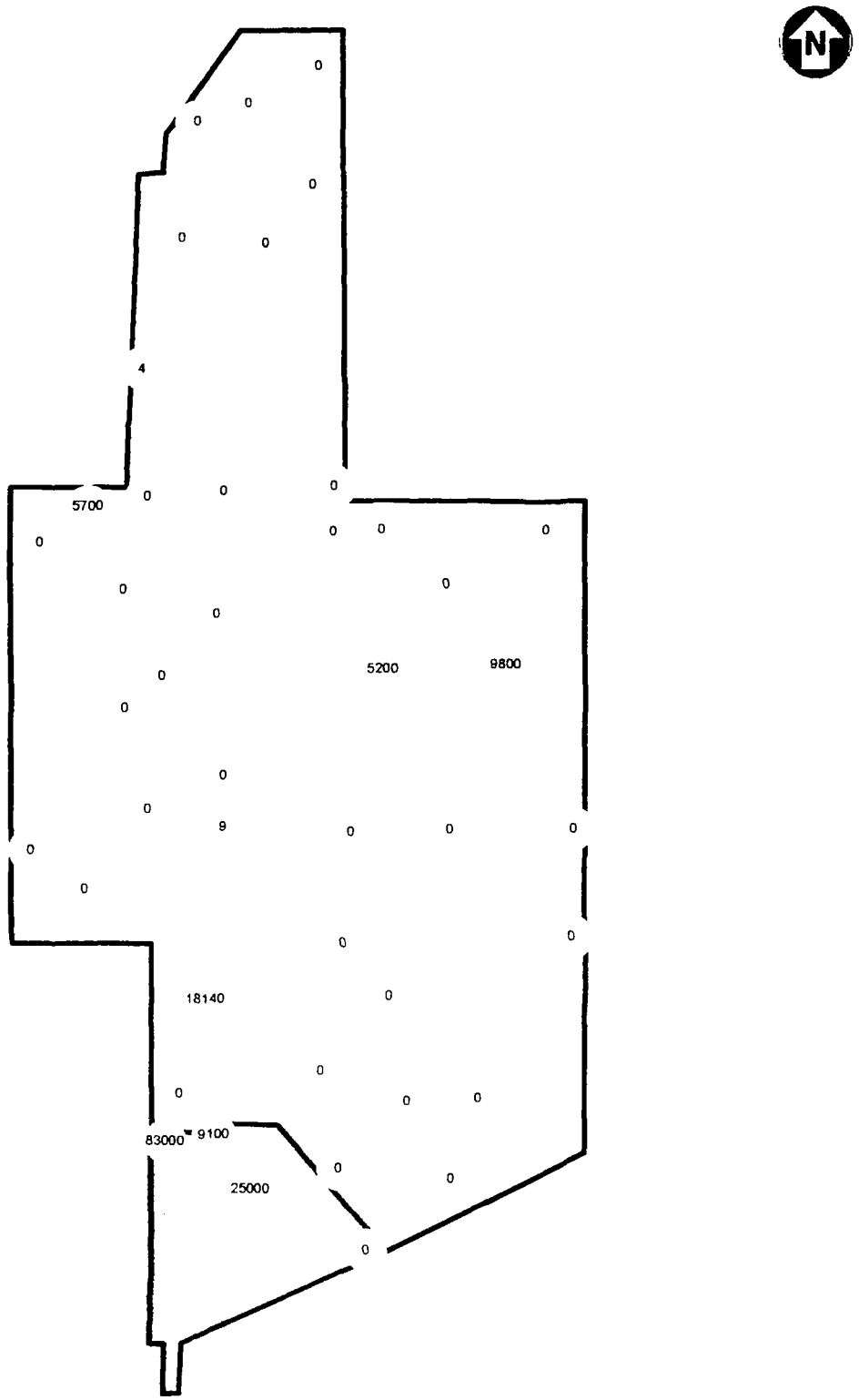
FIGURE 2

AlliedSignal, Inc./The Celotex Corporation

SOIL BORING LOCATION MAP

PARSONS ENGINEERING SCIENCE, INC.
DESIGN • RESEARCH • PLANNING
1000 JORIE BLVD. • OAKBROOK, IL 60523 • (630) 990-7200



LEGEND

780 TOTAL VOCs (ug/kg)

NOT TO SCALE

voc01.srf

FIGURE 3

AlliedSignal, Inc./The Celotex Corporation

DISTRIBUTION OF TOTAL VOCs in SOIL (0 to 0.5 feet)

PARSONS ENGINEERING SCIENCE, INC.

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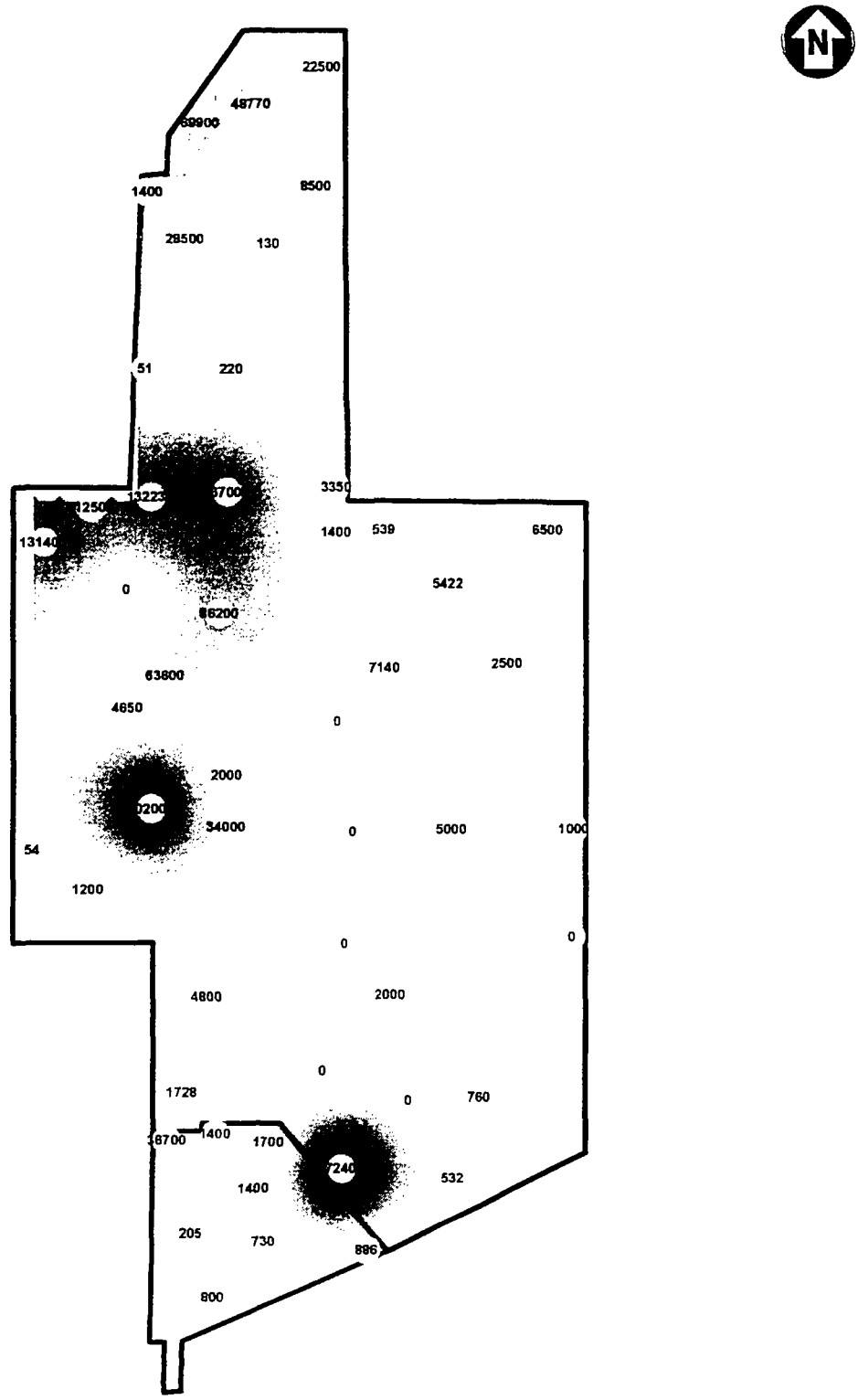


LEGEND

780 TOTAL VOCs (ug/kg)

NOT TO SCALE

vocdp.srf

FIGURE 4

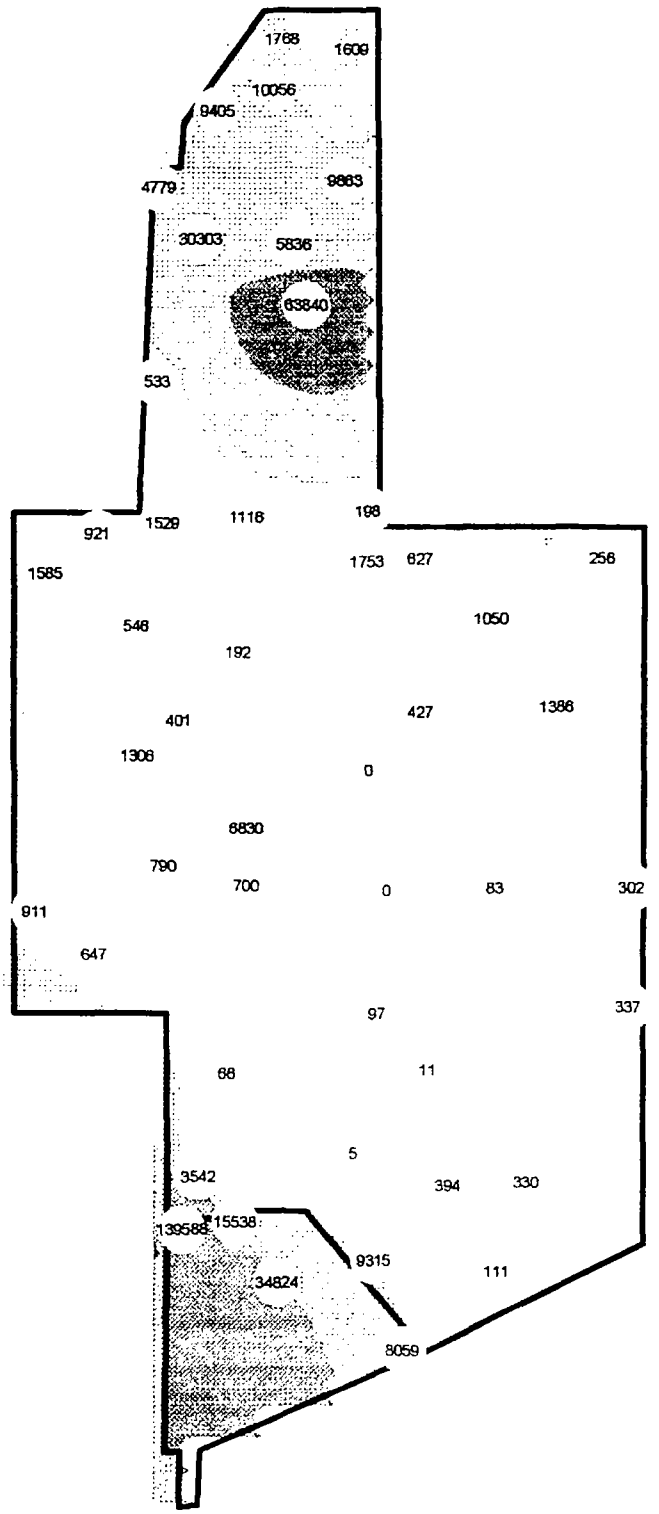
AlliedSignal, Inc./The Celotex Corporation

DISTRIBUTION OF TOTAL VOCs in SOIL (deep sample)

PARSONS ENGINEERING SCIENCE, INC.

DESIGN * RESEARCH * PLANNING

OFFICES IN PRINCIPAL CITIES



LEGEND

780 TOTAL BAP EQUIVALENTS (ug/kg)

NOT TO SCALE

bap01.srf

FIGURE 5

AlliedSignal, Inc./The Celotex Corporation

DISTRIBUTION OF TOTAL BAP EQUIVALENTS (0 to 0.5 feet)

PARSONS ENGINEERING SCIENCE, INC.

DESIGN * RESEARCH * PLANNING

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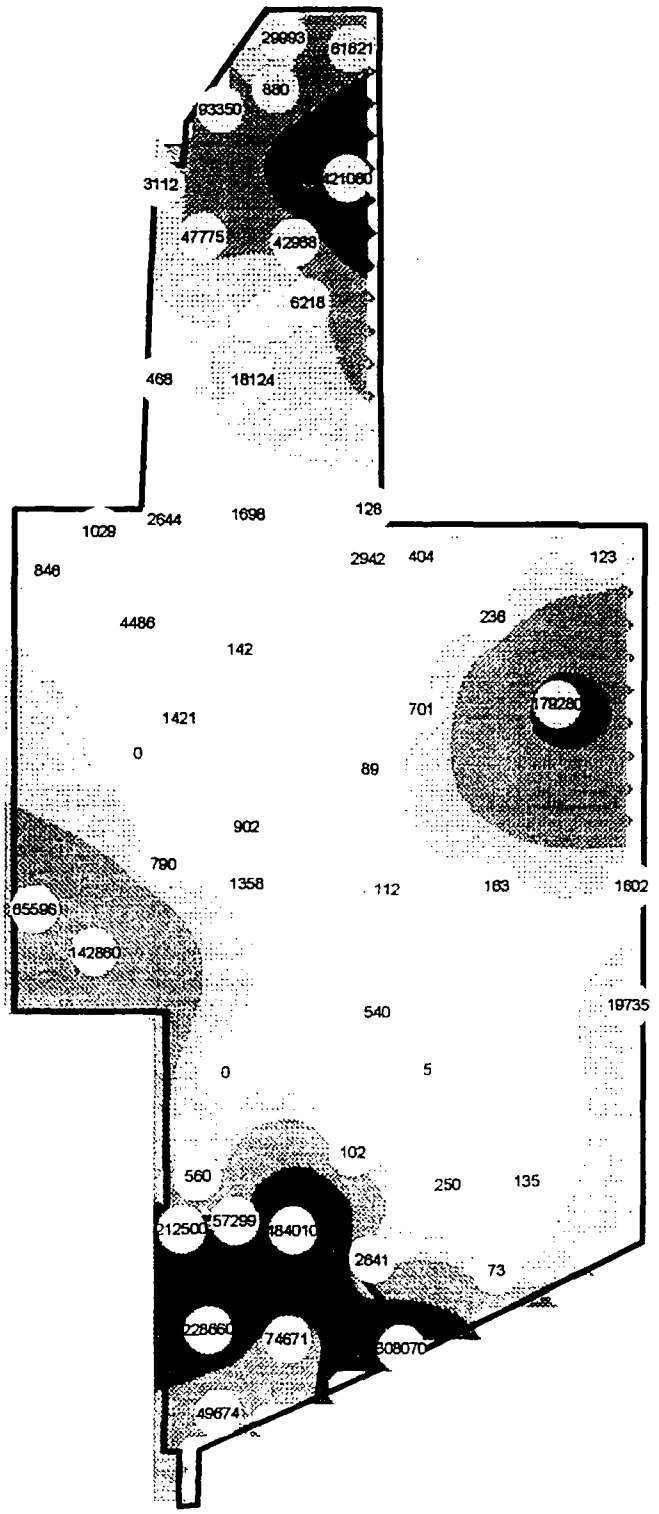

LEGEND

780 TOTAL BAP EQUIVALENTS (ug/kg)

NOT TO SCALE

bap02.srf

FIGURE 6

AlliedSignal, Inc./The Celotex Corporation

DISTRIBUTION OF TOTAL BAP EQUIVALENTS (1 to 2 feet)

PARSONS ENGINEERING SCIENCE, INC.

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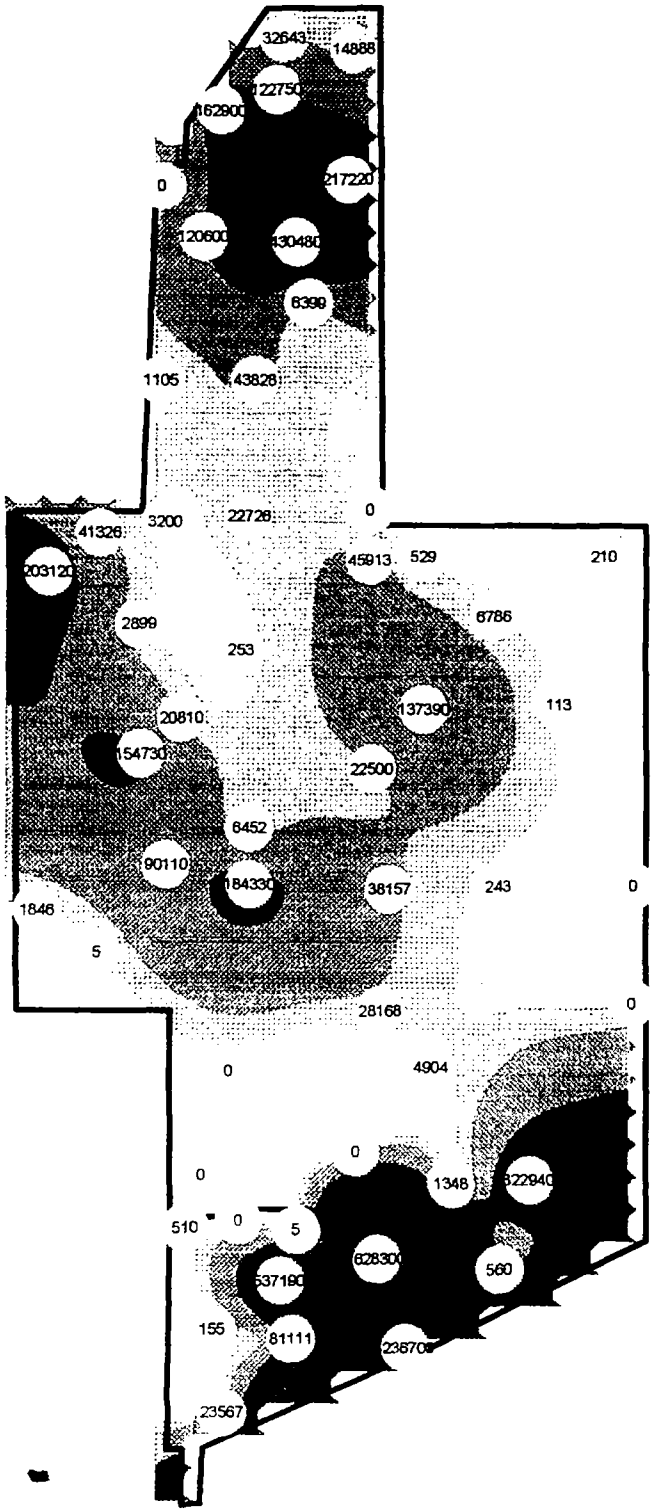

LEGEND

780 TOTAL BAP EQUIVALENTS (ug/kg)

NOT TO SCALE

bapdp.srf

FIGURE 7

AlliedSignal, Inc./The Celotex Corporation

DISTRIBUTION OF TOTAL BAP EQUIVALENTS (deep sample)

PARSONS ENGINEERING SCIENCE, INC.

DESIGN * RESEARCH * PLANNING

1000 JORIE BLVD * SUITE 200 * OAK BROOK, IL 60523 * 630/990-7200

OFFICES IN PRINCIPAL CITIES

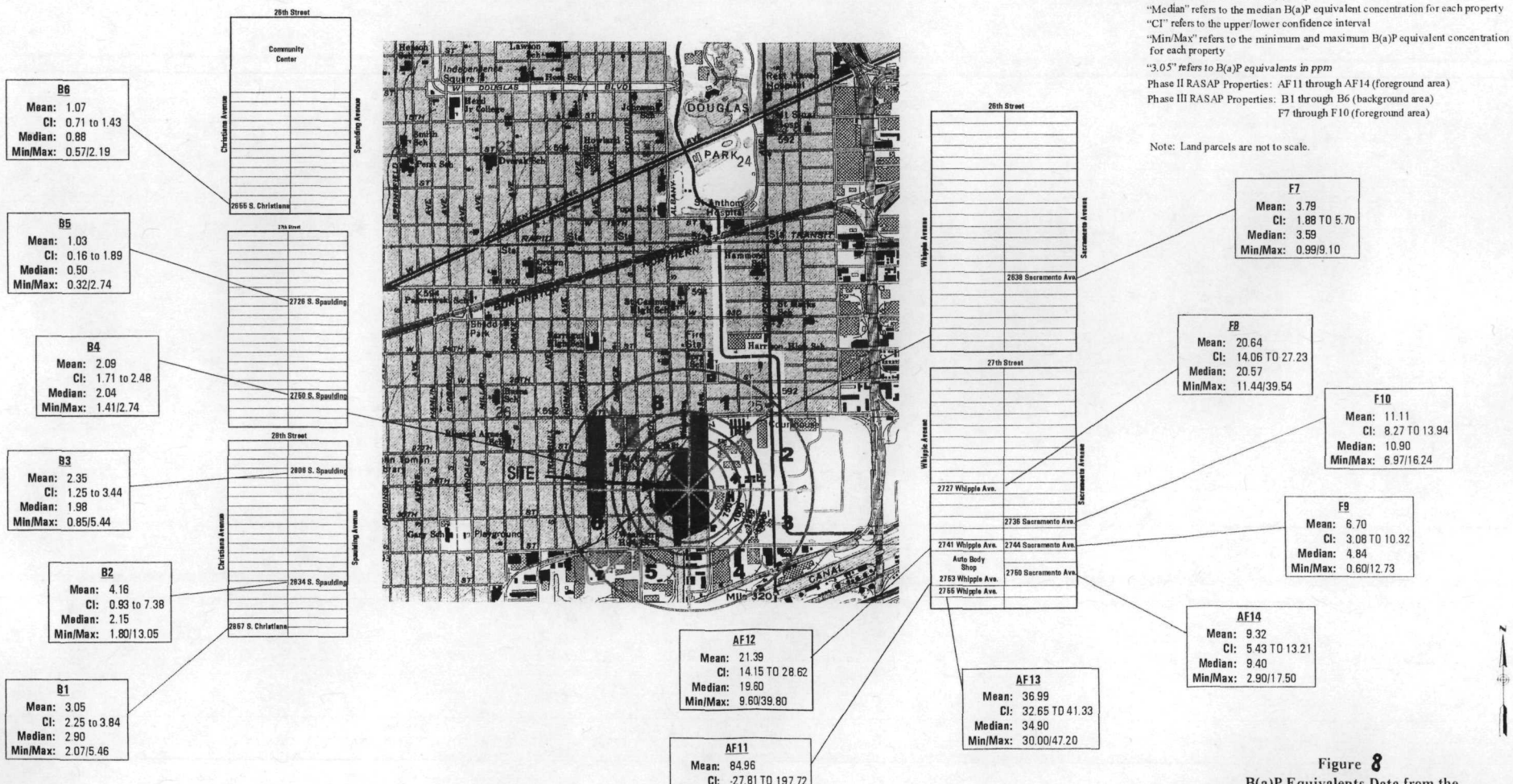

Figure 8
B(a)P Equivalents Data from the
Phase II and III RASAP Based on Various Statistics

AlliedSignal, Inc./The Celotex Corporation

PARSONS ENGINEERING SCIENCE, INC.

ATTACHMENT II

ATTACHMENT III

RESPONSIVENESS SUMMARY

RESPONSE TO COMMENTS ON U.S. EPA's PROPOSED RESPONSE ACTION FOR 2800 SOUTH SACRAMENTO AVENUE SITE ("Site"), CHICAGO, ILLINOIS

The public comment period for U.S. EPA's proposed response action at the Site opened on October 26, 2004 and closed on November 26, 2004. A public meeting was held on November 9, 2004 to discuss the results of the Engineering Evaluation/ Cost Analysis (EE/CA) document and U.S. EPA's proposed response action to the public.

U.S. EPA received a total of one written comment during the public comment period. Several comments were made orally at the public meeting and were answered by Joe Munoz, the U.S. EPA Community Involvement Coordinator or Tom Williams, the U.S. EPA Remedial Project Manager, although only one was made formally. The written comment and the public meeting transcript are included in the Administrative Record for the Celotex Site. This responsiveness summary addresses these comments. Each response is divided into two portions, a summary of the comment and a response to the comment.

The oral comment raised during the public meeting for the Site remediation has been summarized below together with U.S. EPA's response to this comment.

COMMENT: Ms. Carina Sanchez asked whether the Main Site would be restricted from any future use.

RESPONSE: The only restrictions which will be placed on the Main Site are that it cannot be used for residential purposes and EPA will place institutional controls on the Main Site to restrict excavation through the gravel cap.

The written comment from Mr. Ken Lyko of Bennett Environmental regarding the Site has been summarized below, together with U.S. EPA's response to this comment.

COMMENT: The choice to cap the "Main Site" with clay and gravel seems to me to be the easiest way out for both the EPA and Honeywell. Honeywell is a huge Company which budgets tens of millions of dollars annually for remedial actions around the country. The petty amount the EPA is proposing to spend is an insult to the community, for the years of pollution that Honeywell is now responsible for. It is disturbing that a 24 acre site that is heavily contaminated with cancer causing contaminants and next to a residential neighborhood is being considered to be left in place. This piece of property is located in a Chicago District which needs economic development and not another parking lot for trucks, as proposed.

If this contaminated soil is allowed to remain in place, the future of this parcel will be very limited. It seems to me that the entire volume of contaminated soil should be excavated and sent off-site to a Secure Landfill or Soil Incineration plant. Once the entire contamination is removed, endless re-development activities are possible for this choice parcel of land. However, having a "tomb" of contaminated soil just under the surface of this property, reminds me of the "Barrie Park" project in Oak Park. Eventually, the coal tar contamination present made its way to the surface and endangered the residents. The soil was excavated and finally, the proper and "right thing to do" was accomplished. The same thinking should be applied to Celotex site. Remove the contamination first and re-develop a clean parcel of choice land in the district. The money should never be the limiting factor in doing the right thing for the residents and city of Chicago. Honeywell has the money to complete this project, with the entire volume of contaminated soil being excavated and sent off-site.

What will happen to the site if the new owner, who wants to park trucks there, goes out of business in 2 years? A new park on top of a contaminated site is not very appealing. The Chicago Alderman indicated he is not in favor of another "park". Another business who has to build on a contaminated Site is not very appealing knowing the liability present. Also, having to build on a slab, not a foundation because you wouldn't be able to dig a new hole obviously, would be a limiting factor to prospective new buyers.

What about groundwater monitoring, what is the plan for that?

In conclusion, I am sure that the residents of the area are willing to endure some short-term hardship in order to pave the way for a long term positive outcome regarding this situation. Removing them to temporary housing while cleaning their neighborhood and removing contaminated soil is a temporary hardship for a better future.

RESPONSE: The proposed action for the Main Site was evaluated for effectiveness, implementability, and cost in the EE/CA and the gravel cover was determined to represent the best balance of these three criteria. The gravel cover alternative reduces human health risk by creating a barrier that eliminates human health exposure if properly maintained. The human health risks eliminated by the gravel cover alternative are direct contact, ingestion and inhalation of contaminants. The cost of the gravel cover currently in place is estimated to have cost $2,836,000. The cost of covering the additional two acres of gravel is $270,000. Removing the contaminated soil from the Main Site was estimated in the EE/CA to cost $48,600,000 and would dramatically impact the surrounding neighborhood for years by the excavation, truck traffic, and other construction impacts. The gravel cover is clearly the more cost-effective alternative. Furthermore, the gravel cap does not preclude redevelopment, because with proper institutional controls the Main Site can be redeveloped.

The "Barrie Park" project in Oak Park, Il was not evaluated by U.S. EPA under the EE/CA process and therefore can not be compared to the Celotex Site even though the two Sites

have similarities. Barrie Park was remediated under the direction of the Illinois Environmental Protection Agency without input from U.S. EPA.

Groundwater monitoring was determined to be unnecessary because the City of Chicago provides potable water to the residents and soil borings drilled at the Site did not encounter groundwater at any level of the contamination.

ATTACHMENT IV

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
CELOTEX PLANT SITE
CHICAGO, COOK COUNTY, ILLINOIS

ORIGINAL
SEPTEMBER 3, 2004

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	01/00/97	Parsons Engineering Science, Inc.	AlliedSignal, Inc. and The Celotex Corporation	Final Work Plan for the Engineering Evaluation and Cost Analysis of the Former Celotex Site	26
2	03/00/97	Parsons Engineering Science, Inc.	AlliedSignal, Inc. and The Celotex Corporation	Final Support Sampling Plan: Part I - Quality Assurance Project Plan, Part II - Field Sampling Plan, Part III - Health and Safety Plan for the Engineering Evaluation and Cost Analysis of the Former Celotex Site	263
3	05/00/97	Parsons Engineering Science, Inc.	AlliedSignal, Inc. and The Celotex Corporation	Residential Area Conceptual Work Plan for the Engineering Evaluation and Cost Analysis of the Former Celotex Site	137
4	10/00/97	Parsons Engineering Science, Inc.	AlliedSignal, Inc. and The Celotex Corporation	Data Report for the Engineering Evaluation and Cost Analysis of the Former Celotex Site	733
5	10/00/97	Roy F. Weston, Inc.	U.S. EPA	Final Community Involvement Plan for the Celotex Corporation Site	3
6	11/00/97	Parsons Engineering Science, Inc.	AlliedSignal, Inc. and The Celotex Corporation	Final Support Sampling Plan Addendum No. 3 Associated with Phase II of the Residential Area Sampling and Analysis Program for the Engineering Evaluation and Cost Analysis of the Former Celotex Site	23
7	12/00/97	Parsons Engineering Science, Inc.	AlliedSignal, Inc. and The Celotex Corporation	Work Plan for the Main Site Risk Assessment Associated with the Engineering Evaluation and Cost Analysis of the Former Celotex Site	13

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
8	08/00/98	Parsons Engineering Science, Inc.	AlliedSignal, Inc. and The Celotex Corporation	Phase II Residential Area Sampling Report for the Engineering Evaluation and Cost Analysis for the Former Celotex Site	63
9	10/00/98	Parsons Engineering Science, Inc.	AlliedSignal, Inc. and The Celotex Corporation	Final Main Site Risk Assessment for the Engineering Evaluation and Cost Analysis of the Former Celotex Site	313
10	06/00/99	Parsons Engineering Science, Inc.	AlliedSignal, Inc. and The Celotex Corporation	Phase III Residential Area Sampling Report for the Engineering Evaluation and Cost Analysis of the Former Celotex Site	98
11	03/00/04	Parsons	Honeywell International, Inc.	Final Engineering Evaluation and Cost Analysis Report for the Former Celotex Site w/Appendix	376
12	07/00/04	Parsons	Honeywell International, Inc.	Addendum to the Final Engineering Evaluation and Cost Analysis Report for the Former Celotex Site	4

UPDATE #1
OCTOBER 12, 2004

1	10/12/04	Williams, T., U.S. EPA	Administrative Record for the Celotex Plant Site	Memorandum re: Final Clean-up Alternatives at the Former Celotex Site	1

UPDATE #2
JANUARY 26, 2005

1	10/00/04	U.S. EPA	Public	Fact Sheet: EPA Proposes Cleanup Plan; Requests Public Comment	4
2	11/09/04	L.A. Reporting & Videoconferencing	Public	Transcript of Proceedings: Public Meeting for the Proposed Cleanup Plan for the Celotex Plant Site	37
3	00/00/00	U.S. EPA	U.S. EPA	Action Memorandum: **(PENDING)**	

ATTACHMENT V

TABLE 3.1
POTENTIAL FEDERAL STATUTES

ENGINEERING EVALUATION AND COST ANALYSIS REPORT
2800 SOUTH SACRAMENTO AVENUE SITE
CHICAGO, ILLINOIS

Regulation Title or Subject/Revised Code Section and Pertinent Paragraph	Regulation Description	Regulation Application	ARAR
Clean Air Act (CAA) 42 U.S.C. 7400	Statute to protect and enhance the quality of air resources so as to promote public health, welfare, and the productive capacity of the population. Provides guidance for air pollution prevention and control, emission standards, noise pollution and acid deposition control, permits, and ozone layer protection.	Applies to the ambient atmosphere.	Yes
Clean Water Act (CWA) 33 U.S.C. 120	The Clean Water Act is a 1977 amendment to the Federal Water Pollution Control Act of 1972, which set the basic structure for regulating discharges of pollutants to waters of the United States. Primary goal is to restore and maintain the chemical, physical, and biological integrity of U.S. waters.	Applies to waters of the United States.	Yes
Comprehensive Environmental Response, Compensation and Liability (CERCLA) 42 U.S.C. 9600	Statute establishes prohibitions and requirements concerning closed and abandoned hazardous waste sites, provides for liability of persons responsible for releases of hazardous waste at these sites, and establishes a trust fund to provide for cleanup when no responsible party can be identified. Also establishes guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants	Applies to releases or threatened releases of hazardous substances that may endanger public health or the environment.	Yes
Occupational Safety and Health Act (OSHA) 29 U.S.C. 650	Congress passed the Occupational and Safety Health Act to ensure worker and workplace safety. Its goal is to ensure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions.	Applies to employers.	Yes

TABLE 3.1 (Continued)
POTENTIAL FEDERAL STATUTES

ENGINEERING EVALUATION AND COST ANALYSIS REPORT
2800 SOUTH SACRAMENTO AVENUE SITE
CHICAGO, ILLINOIS

Regulation Title or Subject/Revised Code Section and Pertinent Paragraph	Regulation Description	Regulation Application	ARAR
Noise Control Act (NCA) 42 U.S.C. 4900	Purpose is to promote environment free from noise that jeopardizes human health or welfare. Establishes means for effective coordination of federal research and activities in noise control, authorizes establishment of federal noise emission standards for products and provides public with information about noise emission/reduction of products.	Applies to sources of noise pollution.	No
Resource Conservation and Recovery Act (RCRA) 42 U.S.C. 6900	Enacted to protect the quality of groundwater, surface water, air, and land from contamination by hazardous waste. Law gives EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous wastes.	Applies to hazardous waste.	No
Safe Drinking Water Act (SDWA) 43 U.S.C. 300	Established to protect the quality of drinking water in the U.S. This law focuses on all waters actually or potentially designed for drinking use, whether from above ground or underground sources. Sets minimum national drinking water standards.	Applies for drinking waters of the United States.	No

TABLE 3.2
POTENTIAL FEDERAL, STATE, AND COUNTY CHEMICAL-SPECIFIC ARARs

ENGINEERING EVALUATION AND COST ANALYSIS REPORT
2800 SOUTH SACRAMENTO AVENUE SITE
CHICAGO, ILLINOIS

Regulation Title or Subject/Revised Code Section and Pertinent Paragraph	Regulation Description	Regulation Application	ARAR	Comments
40 CFR 50	Establishes ambient air quality standards.	Applies to the ambient atmosphere	Possible	Applicable to discharges of toxic substances to the atmosphere during waste handling or disposal.
40 CFR 261	Part 261 identifies and lists those solid wastes that are subject to regulation as hazardous wastes.	Applies to solid wastes	No	Soils removed from the Site are not hazardous waste. Soils removed from the residential areas will be non-special non-hazardous waste.
40 CFR 262	Parts 262 establishes procedures for obtaining an EPA identification number and identifies record keeping, packaging, labeling, and reporting requirements for hazardous waste generators.	Applies to generators of hazardous waste	Possible	Applicable if soil removed from the site is identified as a special waste.
40 CFR 122-124	Parts 122-124 establish rules for obtaining a National Pollutant Discharge Elimination System (NPDES) permit for wastewater discharges.	Applies to CERCLA wastewater discharges	Possible	Applicable if remedial action involves significant excavation, regrading or resurfacing of the site that could result in the discharge of pollutants through storm water runoff.
Title 35 IAC Part 212	Sets standards and limitations for visible and particulate matter emissions from stationary emission units. Permits for source subject to this part may be required pursuant to 35 Ill. Adm. Code 201.	Applies to the ambient atmosphere	Possible	Applicable to discharges of toxic substances to the atmosphere during waste handling or disposal.
Title 35 IAC Part 218	Sets standards and limitations for emission of organic material and volatile organic material from stationary sources located in the Chicago area.	Applies to the ambient atmosphere	Possible	Applicable to discharges of toxic substances to the atmosphere during waste handling or disposal.
Title 35 IAC Part 720	Establishes the all management policies, procedures and regulations for hazardous waste that are subject to the notification requirements of Section 3010 RCRA.	Applies to hazardous waste management	No	Soils removed from the Site are not hazardous waste. Soils removed from the residential areas will be non-special non-hazardous waste.

TABLE 3.2 (Continued)
POTENTIAL FEDERAL, STATE, AND COUNTY CHEMICAL-SPECIFIC ARARs

ENGINEERING EVALUATION AND COST ANALYSIS REPORT
2800 SOUTH SACRAMENTO AVENUE SITE
CHICAGO, ILLINOIS

Regulation Title or Subject/Revised Code Section and Pertinent Paragraph	Regulation Description	Regulation Application	ARAR	Comments
Title 35 IAC Part 721	Identifies those solid waste which are subject to regulations as hazardous waste under 35 Ill. Adm. Code 702,703, 705 and 722 through 725 and 728, and which are subject to the notification requirements of Section 3010 of the RCRA.	Applies to solid wastes	No	Soils removed from the Site are not hazardous waste but could be special waste. Soils removed from the residential areas will be non-special non-hazardous waste.
Title 35 IAC Part 722	Establishes regulations and standards for generators of hazardous waste under 35 Ill. Adm. Code 721.105(c) and (d).	Applies to generators of hazardous waste	No	Soils removed from the Site are not hazardous waste. Soils removed from the residential areas will be non-special non-hazardous waste.
Title 35 IAC Part 740	Site Remediation Program - Establishes the procedures for the investigative and remedial activities at a site where there is a release, threatened release, or suspected release of hazardous substance, pesticides, or petroleum and for the review and approval of those activities.	Applies to CERCLA sites	Yes	Applicable to this site due to the presence of hazardous substances in the soil.
Title 35 IAC Part 742	Tiered Approach to Corrective Action Objectives - Sets forth procedures for evaluating the risk to human health posed by environmental conditions and developing remediation objectives that achieve acceptable risk levels. The purpose of these procedures is to provide for the adequate protection of human health and the environment based on the risk to human health pose by environmental conditions while incorporating site related information.	Applies to CERCLA sites	Yes	Applicable to this site due to the presence of hazardous substances in the soil.
430 ILCS 55	Hazardous Material Emergency Reimbursement Act - provides for financial resources to any community that responds to an emergency incidents involving hazardous material	Applies to CERCLA sites	Yes	Applicable to this site due to the presence of hazardous substances in the soil.

TABLE 3.3
POTENTIAL FEDERAL, STATE AND COUNTY LOCATION-SPECIFIC ARARs

ENGINEERING EVALUATION AND COST ANALYSIS REPORT
2800 SOUTH SACRAMENTO AVENUE SITE
CHICAGO, ILLINOIS

Regulation Title or Subject/Revised Code Section and Pertinent Paragraph	Regulation Description	Regulation Application	ARAR	Comments
33 CFR 320-330	Parts 320-330 identify requirements to minimize potential harm and preserve and enhance wetlands.	Applies to management of property in wetlands.	No	The Site is not believed to contain any wetlands.
36 CFR 65	Sets forth requirements that encourage the long range preservation of nationally significant properties that illustrate or commemorate the history and prehistory of the United States.	Applies to the alteration of a site that threatens objects of historical or archeological significance.	No	Applicable if significant artifacts are found at the site. No indications of artifacts have been associated with the Site to date.
40 CFR 264.18	Identifies design, operation, and maintenance standards for owners and operators of hazardous waste treatment, storage and disposal (TSD) facilities located within a 100 year floodplain.	Applies to owners and operators of hazardous waste treatment, storage, and disposal facilities.	No	The Site is not a TSD.
50 CFR Parts 200 and 402	Parts 200 and 402 contain requirements regarding endangered or threatened species of fish, wildlife, or plants and habitat of such species that has been designated as critical.	Applies to areas designated as critical habitats	No	No endangered or threatened species are known to be associated with the Site.
55 ILCS 5	Provides for the identification, protection, preservation, restoration, and rehabilitation of buildings, structures, objects, areas, sites, and landscape that are of historical, archaeological, architectural or scenic significance. Promotes economic development through the protection and enhancement of resources important to tourism and business so as to promote the general welfare of the State.	Applies to areas designated as historical landmarks	No	The Site is not a historical landmark.

TABLE 3.4
POTENTIAL FEDERAL, STATE AND COUNTY ACTION-SPECIFIC ARARs

ENGINEERING EVALUATION AND COST ANALYSIS REPORT
2800 SOUTH SACRAMENTO AVENUE SITE
CHICAGO, ILLINOIS

Regulation Title or Subject/Revised Code Section and Pertinent Paragraph	Regulation Description	Action	ARAR	Comments
40 CFR 262 and 263 49 CFR 100-199	Establishes responsibilities for transporters of hazardous waste in regards to handling, transportation and management of the waste. Sets requirements for manifesting, record keeping and emergency response actions in case of a spill.	Off-site transport	No	Applies if soil identified as hazardous waste is transported off- site. Soils removed from the Site will not be hazardous waste and soils removed from the residential areas will be non-special non-hazardous waste.
40 CFR 264	Establishes standards for owners and operators of hazardous waste treatment, storage, and disposal facilities. Also establishes closure and post-closure requirements for RCRA sites.	Storage, Treatment, Incineration, Stabilization, Capping, Land Disposal	No	Applies to the treatment, storage, and disposal of soil identified as a hazardous waste. Soils from the Site are not hazardous waste and soils removed from the residential areas will be non-special non-hazardous waste.
40 CFR 268	Regulates land disposal of solid waste and establishes land disposal restrictions (LDR) treatment standards.	Excavation and land disposal	Possible	Movement of excavated soils to a new location and placement in or on land will trigger LDR for the excavated waste. Applies to soil identified as a restricted hazardous waste (not all hazardous wastes are subject to LDR treatment standards). Soils removed from the Site are not hazardous waste but could be special waste. Soils removed from the residential areas will be non-special non-hazardous waste.

TABLE 3.4 (Continued)
POTENTIAL FEDERAL, STATE AND COUNTY ACTION-SPECIFIC ARARs

ENGINEERING EVALUATION AND COST ANALYSIS REPORT
2800 SOUTH SACRAMENTO AVENUE SITE
CHICAGO, ILLINOIS

Regulation Title or Subject/Revised Code Section and Pertinent Paragraph	Regulation Description	Action	ARAR	Comments
430 ILCS 50/	This Act requires that the Illinois Department of Transportation adopt the federal hazardous material placarding regulations promulgated under the Hazardous Material Transportation Act (PL 93-633) for the interstate and intrastate transportation of hazardous material.	Off-site transport	Possible	Applies if soil identified as hazardous or special waste is transported off- site. Soils removed from the Site are not hazardous waste but could be special waste. Soils removed from the residential areas will be non-special non-hazardous waste.
Section 11-4-1500	Chicago Municipal Code that addresses waste management actions within the City of Chicago.	Excavation and Land Disposal	Yes	Prohibits the disposal of any waste other than at a permitted facility. Would apply to excavated residential soils and would prevent these soils from being placed on the Main Site.
Title 35 IAC Part 728	Identifies hazardous wastes that are restricted from land disposal and defines those circumstances under which an otherwise prohibited waste may continue to be land disposed.	Excavation and land disposal	No	Applies to land disposal of hazardous waste. Soils removed from the Site will not be hazardous waste and soils removed from the residential areas will be non-special non-hazardous waste.