



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

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:

The Illinois Environmental Protection Agency (Illinois EPA) has received your letter dated November 5, 2019 regarding the Hilco Redevelopment Partners (Hilco) cleanup and redevelopment of the former Crawford Power Plant also known as Exchange 55. Responses to the questions from Little Village Environmental Justice Organization are provided below.

1. “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.” Can IEPA share with the community the sampling data results that support this decision?

The sampling results reviewed by the Illinois EPA to support the decision that impacts have not migrated to the neighborhoods to the north of the site can be found in Section 5.3.1, and supporting Figures 5.1.A through 5.5.a, in the July 2018 Comprehensive Site Investigation Report. Hilco conducted sampling in the north section of the site in December 2018 to assess data gaps identified by the Illinois EPA. The additional sampling summary is presented in Section 2.3, and supporting Figures 2.2A, 3.1.A through 3.3, in the April 2019 Supplement to Comprehensive Site Investigation Report, Remediation Objectives Report & Remedial Action Plan. Finally, Hilco conducted sampling in the north section of the site in July and August 2019 to assess data gaps identified in Comment #3 of the July 3, 2019 Illinois EPA comment letter. The additional sampling summary is presented in the responses and Figure 1 in the August 23, 2019 Response to IEPA Conditional Approval Letter dated July 3, 2019.

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The information may be accessed at V3's FTP site: <http://v3ftp.v3co.com>. The login name is "Crawford" and the password is "IEPADocuments" (case sensitive).

2. What is the status of the site inspection in regard to the use of treated effluent on the site being used for dust suppression?

The Illinois EPA Bureau of Water inspected the site on October 2, 2019. A Hilco Redevelopment Partner representative indicated that nearly all of the water used to control dust from demolition comes from the City of Chicago public water supply with about two percent from bio-swale/detention basins. Dust suppression water used during construction activities, currently earth moving work, comes from onsite post-treatment stormwater collected in the east bio-swales. Discharges of stormwater from the former Crawford Generating Station site are covered by NPDES Permit No. IL0002186. The use of treated stormwater from on-site bioswales for dust control during construction/earthwork activities must be documented in the facility's Stormwater Pollution Prevention Plan.

3. Given the results of the 2012 violation notice for ground water standards for pH, Iron, Manganese, Sulfate, Chloride, Total Dissolved Solids, and Antimony, why are those same contaminants not being monitored for currently?

Illinois EPA issued the 2012 violation notice for non-compliance with 35 Illinois Administrative Code Part 620: Groundwater Quality Standards at the former coal combustion residual (CCR) surface impoundment. After removing the coal combustion residues, Midwest Generation closed the CCR impoundment (See the attached Compliance Commitment Agreement). As the CCR impoundment is no longer a source of contamination, monitoring of pH, iron, manganese, sulfate, chloride, total dissolved solids and antimony is not necessary.

4. LVEJO will be following up separately on the issue of Coal Ash.

The Illinois EPA welcomes your comments and thoughts regarding coal ash.

5. "Based on the sampling results, no remedial measures of this area are warranted" - Can IEPA share the sampling results?

The sampling results collected on the eastern waterfront of the property can be found in Section 4.3, and corresponding Tables 4.3 through 4.3.4, in the July 2018 Comprehensive Site Investigation Report. Supplemental sampling results collected on the eastern waterfront of the property can be found in Section 3.3.3 and corresponding Table 3.3 in the April 2019

Supplement to Comprehensive Site Investigation Report, Remediation Objectives Report & Remedial Action Plan.

The information may be accessed at V3's FTP site: <http://v3ftp.v3co.com>. The login name is "Crawford" and the password is "IEPADocuments" (case sensitive).

6. What is the timeline for the modeling will occur once the assessment activities are completed?

Fate and transport modeling are conducted after the remedial action is completed at the site and remaining concentrations of contaminants are known. The modeling for the remaining contamination at the site will be provided in the Remedial Action Completion Report.

Further information about the former Crawford Power Plant site can be found at:

<https://www2.illinois.gov/epa/topics/community-relations/sites/hilco/Pages/default.aspx>.

Documents related to this site may be found on Illinois EPA's Document Explorer:

<https://external.epa.illinois.gov/DocumentExplorer/>. Please contact Chris Pressnall,

Environmental Justice Coordinator, at chris.pressnall@illinois.gov for further questions or for help in accessing the reports and related correspondence.

Thank you for your attention to the Crawford site cleanup and your ongoing commitment to a healthy environment. Illinois EPA staff are working across our Bureaus of Air, Land, and Water to ensure that Hilco's demolition and remediation activities comply with applicable state environmental laws and regulations. We appreciate the opportunity to continue to work with you on these shared goals.

Sincerely,



John J. Kim
Director