

**APPENDIX F – ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY CSIR/ROR REVIEW  
LETTER, OCTOBER 17, 2019**



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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October 17, 2019

City of Chicago, Dept of Fleet & Facility Management (2FM)  
Attn: Ms. Kimberly Worthington  
30 North LaSalle Street, Suite 300  
Chicago, IL 60602-2575

Re: 0316275397/Cook County  
Chicago/Resilient Corridor Fifth Avenue Eco Orchard – Southern Parcel  
Site Remediation/Technical Reports

Dear Ms. Worthington:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the *July 23, 2019 Comprehensive Site Investigation Report and Remedial Objectives Report* (received July 24, 2019/Log No. 19-69745), which was submitted by Brecheisen Engineering, Inc. (BEI) on behalf of City of Chicago Department of Fleet and Facility Management. **The aforementioned document is conditionally approved with the following comments:**

1. Please clarify the acreage of the Site, as the DRM-1 states 0.33 acres while the report states 0.27 acres.
2. Section 1.6 mentions an additional parcel being acquired and added to the Remediation Site. If so, additional figures and investigation and/or subsequent sampling may be necessary.
3. It is noted there were no exceedances of the Tier 1 Groundwater Remediation Objectives (GROs) for the indoor air inhalation exposure route as found in 35 Illinois Administrative Code (IAC) 742 Appendix B Table H. Please note use of this table is based on the assumption that any existing or future building has a full concrete slab-on-grade or full concrete basement floor and walls. If this condition is not preferred in the No Further Remediation (NFR) letter, an alternate approach may be proposed.
4. The site specific  $f_{oc}$  values cannot be approved at this time. Analytical tables show that SB-1 0-3', SB-5 6-9', and SB-9 3-6' were co-analyzed for select volatile organic compounds (VOCs), select semi-volatile organic compounds (SVOCs), and RCRA metals.  $f_{oc}$  samples must be collected from uncontaminated areas of the site. To support this demonstration, the

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9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000  
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022  
2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200  
100 W. Randolph Street, Suite 4-500, Chicago, IL 60601

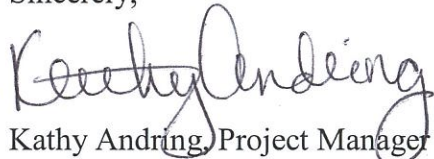
Illinois EPA requires co-sampling of the  $f_{oc}$  sample locations for VOCs and SVOCs listed in 35 IAC 740 Appendix A Tables A and B.

5. Analytical results identify dibenzo(a,h)anthracene at a concentration of 11 mg/kg (measured at SB-4 0-3'), above the soil component of the groundwater ingestion route remediation objective for Class II groundwater. This Contaminant of Concern was not included on Table 5.1 "Remaining Soil Exceedances of the Tier 1 SROs."
6. Section 6.2 mentions the possible excavation and disposal of impacted soil and the construction of an engineered barrier of three (3) feet of clean fill. Please note, any clean fill imported to the site must be analyzed at a rate of one (1) sample per 500 cubic yards of material for the 35 IAC 740 Target Compound List and results must meet their respective 35 IAC 742 Tier 1 residential remediation objectives. If an engineered barrier not identified in 35 IAC 742.1105 is planned (i.e. 18-inches of clean fill material coupled with geotextile), it is suggested the Remedial Action Plan be approved by the Illinois EPA prior to beginning construction.

The Illinois EPA anticipates receipt of additional discussion of the above comments as part of the Remedial Action Plan. The Illinois EPA requests a fourteen (14) day advance notice of any site investigation or remedial activities at the Remedial Site so Illinois EPA personnel can schedule site visits during those activities.

If you have any questions, please feel free to contact me at (217) 785-1978 or e-mail me at [katherine.andring@illinois.gov](mailto:katherine.andring@illinois.gov).

Sincerely,

TH 

Kathy Andring, Project Manager  
Voluntary Site Remediation Unit  
Remedial Project Management Section  
Division of Remediation Management  
Bureau of Land

cc: Mr. Thomas Brecheisen, BEI, - [tom@beichicago.com](mailto:tom@beichicago.com)

Bureau of Land file