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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 03 2020

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: ACTION MEMORANDUM - Request for Approval and Funding of a Time-Critical Removal Action at the 127th Street Soil Site, Chicago, Cook County, Illinois (Site ID # C5QW)

FROM: Kristina Miller, On-Scene Coordinator (OSC) KM
Emergency Response Branch 2/Emergency Response Section 3

THRU: Samuel Borries, Chief
Emergency Response Branch 2

TO: Douglas Ballotti, Director
Superfund & Emergency Management Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document your approval to expend up to $691,295 to conduct a time-critical removal action at the 127th Street Soil Site ("Site"), in Chicago, Cook County, Illinois (Figure 1). The proposed time-critical removal action is necessary to mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the Site. There are no nationally significant, or precedent-setting issues associated with the proposed response at this non-National Priority List (NPL) site.

This Action Memorandum serves as approval for expenditures by the U.S. Environmental Protection Agency, as the lead technical agency, to take the actions described below to abate the imminent and substantial endangerment posed by the hazardous substances at the Site. The proposed removal of the hazardous substances will be taken pursuant to Section 104(a)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a)(1), and Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.415.

II. SITE CONDITIONS AND BACKGROUND

Site ID: C5QW
CERCLIS ID: ILN000511842
RCRA ID: N/A
Category: Time-Critical Removal Action
Site Location: 12710 S. Carondolet Avenue, Chicago, Illinois 60633

A. Site Description

1. Removal Site Evaluation

The Hegewisch Little League Field, now known as the 127th Street Soil Site, was initially part of a removal site evaluation for the Watco Terminal Site (Site ID C5NL). EPA Region 5's Air Program has been studying ambient air in Chicago's Southeast side since 2013 in response to residents' concerns about the area's long industrial history. The Watco Terminal and Port Services Facility has been a part of this investigation, including several inspections since June 2014. After EPA's Air Program required the company to install an ambient air monitor to measure respirable particulate matter (PM_{10}) and metals, including manganese, the Agency determined manganese emissions exceeded the health-based screening level.

In response to the air monitoring data, on January 30, 2019, United States Senators Richard J. Durbin and Tammy Duckworth sent a letter to EPA Region 5 Regional Administrator Cathy Stepp requesting that EPA conduct soil sampling in the residential communities near the Watco facility located on 126th Street on the southeast side of Chicago, Illinois.

Following the letter from Senators Durbin and Duckworth, EPA's Removal Program planned a residential soil sampling assessment for the Watco Terminal Site. EPA's focus was to evaluate any impact in nearby residential properties from fugitive manganese emissions at the Watco Terminal and Port Services Facility. EPA sampled for other metals as well (including lead and arsenic). The target sampling area was roughly between East 126th Place to the north and East 127th and 128th streets to the south, South Torrence and South Muskegon Avenues to the east and South Carondolet Avenue to the west. EPA acquired access to and sampled over 50 homes within the target sampling area in Spring/Summer 2019. None of the residential homes sampled exceeded Removal Management Levels (RMLs) for lead, arsenic, or manganese.

As part of the Watco Terminal Site removal evaluation, EPA gained access to sample the Hegewisch Little League Field (later to be called the 127th Street Soil Site) located at 127th Street and Carondolet Avenue in early Fall 2019. The field was located within the target residential sampling area and is regularly used by children who reside in the area.

The Hegewisch Little League Field was sampled on September 18, 2019. The field was divided into 18 grids, which were sampled individually to provide better spacial representation (see Figure 3). The individual grid samples from within the baseball field fences were taken by advancing five boreholes within each grid. Each borehole was advanced to a depth of 12 inches below ground surface (bgs) utilizing a hand auger. From each borehole, the soil was divided into

two six-inch aliquots (0-6" and 6-12"), which were then combined with corresponding depths from each aliquot in the grid to create five-point composite samples. The samples collected from outside the baseball field fences were taken by collecting five-point composite samples from the surficial soils in each grid due to the soil being too compacted to sample down to a foot using a hand auger. In total, 35 samples were collected from the baseball field property, including two field duplicate samples, which were sent to an off-site laboratory for EPA Resource Conservation and Recovery Act (RCRA) 8 metals analysis. Samples were also later screened using X-Ray Fluorescence (XRF).

The results from the sampling indicated that six grids from within the baseball field (C2, C3, C4, D2, D3, and D4) contained lead and/or arsenic contamination within the 0 to 12-inch bgs sampling depth that exceeded the EPA residential RMLs for lead and arsenic, which are 400 mg/kg and 68 mg/kg, respectively (Tetra Tech, 2020). A summary of the sampling results can be found in Table 1 and a map of the corresponding grids can be found in Figure 2. The full validated analytical package can be found in the Administrative Record. The highest observed results for lead and arsenic were 686 mg/kg and 169 mg/kg, respectively. None of the samples exceeded the EPA residential soil RML for manganese (5,500 mg/kg).

Several samples collected at the 127th Street Soil Site exceeded EPA residential RMLs for lead and arsenic. The sampling results for the field are being compared to residential RMLs, rather than industrial RMLs because of the amount of time that children spend at the property. After receiving the sampling results for the Hegewisch Little League Field and comparing it to the residential sampling results, EPA determined that the contamination found at the Hegewisch Little League Field was not related to the Watco Terminal Site because the contamination was lead and arsenic, likely from historical fill material below the field. This is not consistent with the investigation into fugitive manganese air emissions. As such, this Site was separated from the Watco Terminal Site into the 127th Street Soil Site and evaluated for a time-critical removal action.

In late 2019, EPA determined that Hegewisch Little League (HLL), a non-profit organization operated under a Board, had owned and operated the HLL baseball field since 1963.

2. Physical location

The Site is in located at 12710 S. Carondolet Avenue in the City of Chicago, Cook County, Illinois and consists of a single baseball field and surrounding parking lot and spectator areas. The Site lies in the southwestern quadrant of Section 30, Township 37 North, Range 15 East, of Lake Calumet, Illinois, topographic quadrangle (Figure 1). The Site lies at approximately 584 feet above mean sea level and includes Hegewisch Little League baseball field. The geographic coordinates for the Site are latitude 41.664241 degrees north and longitude -87.550031 degrees west (as measured from the approximate center of the Site).

An Environmental Justice (EJ) analysis for the Site was conducted (Attachment 1). Screening of the surrounding area used Region 5's EJ Screen Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Region 5 reviewed

environmental and demographic data for the area surrounding the Site and determined that there is a high potential for EJ concerns at this location.

3. Site Characteristics

The Site consists of a single little league baseball field and adjoining parking lot and spectator areas that are owned by the Hegewisch Little League. According to aerial photography, the Site has been utilized as a baseball field since at least 1964. Prior to its utilization as a baseball field, the Site appears to have been vacant until at least 1938. Topographic maps indicate the site was part of a waterway associated with the former Hyde Lake prior to 1892 to between 1893 and 1900 and then a marsh or swamp.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

The presence of a hazardous substance at the Site is documented. Lead and arsenic are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14). *See* 40 C.F.R. § 302.4. Lead and arsenic levels at the surface of the soil exceed residential EPA RMLs. This time-critical removal action is addressing arsenic and lead contaminated soil exceeding EPA residential soil RMLs.

Lead exposure via inhalation and/or ingestion can have detrimental effects on almost every organ and system in the human body. Exposure may occur from direct ingestion of soil in yards, soil tracked indoors, or house dust; and inhalation of fugitive dust. Lead can cause a variety of health problems to people who are exposed to it. Potential human receptors include community members, including children under seven, recreational users, and pregnant or nursing women. Children are at greatest risk from the toxic effects of lead. Initially, lead travels in the blood to the soft tissues (heart, liver, kidney, brain, etc.). Then it gradually redistributes to the bones and teeth where it tends to remain. Children exposed to high levels of lead have exhibited nerve damage, liver damage, colic, anemia, brain damage, and death. The most serious effects associated with markedly elevated blood lead levels include neurotoxic effects such as irreversible brain damage.

Arsenic exposure via inhalation and/or ingestion has impacts on a broad range of systems in the human body. Potential health effects from exposure to arsenic include decreased production of red and white blood cells which may cause fatigue, abnormal heart rhythm, blood-vessel damage resulting in bruising, impaired nerve function, and skin changes. Swallowing arsenic has also been reported to increase the risk of cancer in the liver, bladder, and lungs. Exposure may occur from direct ingestion of soil, soil tracked on shoes, and inhalation of dust and soil particles from the yard. Potential human receptors include community members, including children under seven, recreational users, and pregnant or nursing women.

The known hazardous substances at the Site (lead and arsenic) exist in the soil of a little league field that is used for recreational sports. The lead and arsenic in soil is unsecured and has no containment. Lead and arsenic have the potential to be released from this property by means such as tracking, surface runoff, and wind dispersion.

5. NPL status

This Site is not on the NPL and is not being proposed for listing at this time.

6. Maps, pictures and other graphic representations

Figure 1: Site Location Map
Figure 2: Site Layout Map

Table 1: Summary of Soil Sampling Data and Comparison to Removal Management Levels

B. Other Actions to Date

1. Previous actions

No removal or remedial actions have been conducted at the Site. Assessment work conducted at the site was documented in section II.A.1.

2. Current actions

None

C. State and Local Authorities' Roles

1. State and local actions to date

EPA has continually coordinated with the Chicago Department of Public Health and the Agency for Toxic Substances and Disease Registry (ATSDR) regarding the investigation of contamination at the Site. The entities have assisted EPA with obtaining access agreements for sampling and community outreach.

2. Potential for continued state/local response

EPA is coordinating with various local, State, and federal agencies regarding the Site. These agencies include the City of Chicago, Illinois Environmental Protection Agency (Illinois EPA), and ATSDR.

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

EPA's removal site evaluation indicates that conditions at the Site present an imminent and substantial threat to the public health, or welfare, or the environment and meet the criteria for a time-critical removal action as provided for in 40 C.F.R. § 300.415(b)(1), based on factors in § 300.415(b)(2) of the NCP. These factors include, but are not limited to, the following:

40 C.F,R. § 300.415(b)(2)(i) - Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants:

Six grids at the Site are contaminated with lead and/or arsenic in soil that exceeds residential soil RMLs in the top 12 inches. Lead and arsenic are hazardous substances as defined by Section 101(14) of CERCLA. Exposure may occur from direct ingestion of soil, soil tracked indoors, inhalation of fugitive dust. Potential exposure through these pathways could cause imminent endangerment to human health, welfare, or the environment.

This baseball field has a high accessibility to sensitive populations, including young children under the age of seven years. Players and other children who utilize the property may be exposed to contamination through exposed patches of dirt, especially when disturbed by maintenance or activity. The highest lead and arsenic concentrations found in the surface soils at the Site were 686 mg/kg and 169 mg/kg, respectively.

ATSDR states that exposure to lead can lead to negative health effects. The main exposure pathways for lead are through inhalation or ingestion. People can be exposed by swallowing or breathing the lead into the body. The target system that lead affects in the body is the nervous system. Exposure to lead over long periods of time can lead to a small increase in blood pressure, anemia, and decreased neurological function. Exposure to high levels of lead can lead to brain and kidney damage and ultimately death. Pregnant women and children are populations of special concern for lead exposure. Lead exposure during pregnancy can cause miscarriage or developmental problems in the unborn fetus. No safe level of lead exposure has been found for children since they are more sensitive to lead than adults. Health effects from lead exposure in children include anemia, kidney damage, colic, muscle weakness, and brain damage. Children can also experience mental and physical development growth effects.[1]

ATSDR states that exposure to arsenic can also lead to negative health effects. According to ATSDR, "inorganic arsenic has been recognized as a human poison since ancient times, and large oral doses can result in death". Other health effects caused by ingestion of inorganic arsenic include decreased production of red and white blood cells which may cause fatigue, abnormal heart rhythm, blood-vessel damage resulting in bruising, impaired nerve function, and skin changes. Swallowing arsenic has also been reported to increase the risk of cancer in the liver, bladder, and lungs. Almost no information is available on the effects of organic arsenic compounds in humans. Studies in animals show that most simple organic arsenic compounds (such as methyl and dimethyl compounds) are less toxic than the inorganic forms. In animals, ingestion of methyl compounds can result in diarrhea, and lifetime exposure can damage the kidneys. Lifetime exposure to dimethyl compounds can damage the urinary bladder and the kidneys.[2]

1 http://www.atsdr.cdc.gov/toxprofiles/tp13.pdf
2 https://www.atsdr.cdc.gov/toxprofiles/tp2.pdf

40 C.F.R. § 300.415(b)(2)(iv) - High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate:

As stated previously, surface soils in six grids at the Site exceed RMLs established by the EPA for lead and arsenic, which are listed hazardous substances. The highest lead and arsenic concentrations found in the surface soils at the Site were 686 mg/kg and 169 mg/kg, respectively.

Recreational users of the Site may cause the high levels of lead and arsenic to migrate into other areas by walking through and tracking in, playing, and other recreational activities, especially in areas where the soil does not have any cover. Other means of migration may include routine construction and field maintenance activities.

40 C.F.R. § 300.415(b)(2)(v) - Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released:

The lead and arsenic contamination at the Site exist in the soil, which is exposed to the elements without proper containment. Release could occur from high winds dispersing surface particulate matter containing lead and/or arsenic, resulting in exposure to nearby residents or recreational users, including sensitive populations, within the Site. Grass cover is generally lighter in the early Spring and Fall, allowing more potential of tracking contaminated soil. Rain or thundershowers may cause the outdoor lead to migrate via surface runoff.

40 C.F.R. § 300.415(b)(2)(vii) - The availability of other appropriate federal or state response mechanisms to respond to the release:

At this time, it appears that no local or State agency has the resources to respond to the immediate threat.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the known and suspected hazardous substances at the Site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from the Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The response actions described in this memorandum directly address actual or potential releases of hazardous substances at the Site, which may pose an imminent and substantial endangerment to public health, or welfare, or the environment.

The proposed action involves excavation and removal of lead and arsenic-contaminated soil, backfilling excavated areas to original grade with clean material (backfill & topsoil), and landscape restoration. EPA proposes to remove and properly dispose of contaminated soil and waste materials that exceeds the action level of 400 mg/kg lead and/or 68 mg/kg arsenic within the top foot of soil that presents an imminent and substantial endangerment to public health. EPA has sampled the Site and found lead and/or arsenic contamination exceeding EPA RMLs in six of the 18 grids.

EPA Emergency Rapid Response Service (ERRS) contractor will take the following actions:

a) Develop and implement a Work Plan and site-specific health and safety plan (HASP);
b) Provide for site security measures, as necessary;
c) Establish and maintain staging and stockpile area(s), as necessary;
d) Excavate soil exceeding 400 mg/kg for lead and/or 68 mg/kg for arsenic, as determined by EPA sampling. Soil will be excavated to a depth not to exceed 24 inches below ground surface;
e) Implement dust control measures to ensure worker and public health protection;
f) Replace excavated soil with clean soil;
g) Place a visual barrier such as orange construction fencing or landscape fabric above the contaminated soil and beneath the clean backfill soil if contaminated soil is identified at a depth greater than approximately 24 inches below ground surface;
h) Restore the baseball field to as close to practicable to its pre-removal condition;
i) Stage, treat as necessary, transport, and dispose off-site of any hazardous substances, pollutants and contaminants at a CERCLA-approved disposal facility in accordance with EPA's Off-Site Rule (40 C.F.R. § 300.440); and
j) Take any other response actions to address any release or threatened release of a hazardous substance, pollutant and contaminant that the EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

EPA Superfund Technical Assessment and Response Team (START) contractor will take the following actions:

a) Develop and implement the following site-specific plans:
    a. Air Monitoring Plan (AMP)
    b. Sampling and Analysis Plan (SAP)
    c. Emergency Contingency Plan (ECP)
b) Conduct air monitoring during on-site activities, which will include the utilization of wireless telemetry (VIPER) and sampling for heavy metal particulates per the Air Monitoring Plan;
c) Submit air samples to a laboratory per the Air Monitoring Plan;
d) Conduct pre- and post-removal elevation surveying, as necessary;
e) Conduct oversight and documentation of removal and restoration activities;
f) Collect confirmation samples from the removal area for field x-ray fluorescence (XRF) and/or laboratory analysis;
g) Conduct GIS and data management;
h) Complete a removal report.

As of the September 2019, round of sampling, six grids of the Site are targeted for removal. If additional sampling identifies other areas above RMLs, those areas may be excavated as well.

The proposed response action will mitigate the threats at the Site by properly identifying, consolidating and packaging hazardous substances and materials on-site. The consolidated materials will be removed and ultimately disposed off-site. Additional Site activities may include security, perimeter air monitoring and decontamination on the Site, as needed to complete the removal action.

This response action will be conducted in accordance with Section 104(a)(1) of CERCLA, 42 U.S.C. § 9604(a)(1) and Section 300.415 of the NCP, 40 C.F.R. § 300.415, to abate or eliminate the immediate threat posed to public health and/or the environment by the presence of the hazardous substances.

The removal action will be conducted in a manner not inconsistent with the NCP. If necessary, post-removal site control may be conducted consistent with the provisions of Section 300.415(l) of the NCP.

2. Contribution to remedial performance

The proposed action will not impede future remedial actions based on available information.

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

Not Applicable.

4. Applicable or relevant and appropriate requirements (ARARs)

Applicable or relevant and appropriate requirements (ARAR) of federal and State law identified in a timely manner will be complied with to the extent practicable considering the exigencies of the situation. On January 7, 2020, EPA sent an email request to Jerry Willman of Illinois EPA requesting any State of Illinois ARARs that may apply (Miller, 2020). EPA will consider and implement the submitted ARARs, as appropriate.

While it is not strictly an ARAR, all hazardous substances removed off-site pursuant to this removal action for treatment, storage, and disposal will be treated, stored, or disposed of at a facility in compliance, as the EPA determines, with the EPA Off-Site Rule, 40 C.F.R. § 300.440.

5. Project schedule

It is estimated that the project will take approximately 20 working days.

6. Estimated costs

REMOVAL ACTION PROJECT CEILING ESTIMATE	
Extramural Costs:	
Regional Removal Allowance Costs:	$505,160
Other Extramural Costs Not Funded from the Regional Allowance:	
Total START, including multiplier costs	$70,919
Subtotal Extramural Costs	$576,079
Extramural Costs Contingency (20% of Subtotal)	$115,216
TOTAL REMOVAL ACTION PROJECT CEILING	$691,295

The response actions described in this memorandum directly address the actual or threatened release of hazardous substances, pollutants or contaminants at the Site which may pose an imminent and substantial endangerment to public health or welfare or to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

All hazardous substances, pollutants or contaminants removed off-site pursuant to this removal action for treatment, storage and disposal shall be treated, stored, or disposed at a facility in compliance, as determined by EPA, with the EPA Off-Site Rule, 40 C.F.R. § 300.440.

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

Given the Site conditions, the nature of the hazardous substances on-site, the potential exposure pathways to nearby populations described in Sections II, III, and IV above, and the actual or threatened release of hazardous substances from the Site, failing to take or delaying action may present an imminent and substantial endangerment to public health, welfare or the environment.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in the Enforcement Confidential Addendum.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be $1,173,076[3].

($691,295 + $25,000) + (63.77% x $716,295) = $1,173,076

IX. RECOMMENDATION

This decision document represents the selected removal action for the 127th Street Soil Site in Chicago, Cook County, Illinois. This document has been developed in accordance with CERCLA, as amended and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site, see Attachment III. Conditions at the Site meet the NCP criteria at 40 C.F.R. § 300.415(b)(2) for a time-critical removal action, and I recommend your approval.

The total removal project ceiling, if approved, will be $691,295. Of this, an estimated $620,376 may be used for the cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: _____ DATE: 3/3/2020
Douglas Ballotti, Director
Superfund & Emergency Management Division

DISAPPROVE: _____ DATE: _____
Douglas Ballotti, Director
Superfund & Emergency Management Division

Figures:
Figure 1: Site Location Map
Figure 2: Site Layout Map

Tables:
Table 1: Summary of Soil Sampling Data and Comparison to Removal Management Levels

[3] Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgement interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States right to cost recovery.

Attachments:
I: Environmental Justice (EJ) Screen
II: Detailed Cleanup Contractor Estimate
III: Administrative Record Index
IV: Independent Government Cost Estimate (IGCE)

Enforcement Addendum

cc: S. Ridenour, U.S. EPA, 5104A/B517F (Ridenour.Steve@epa.gov)
L. Nelson, U.S. DOI, **w/o Enf. Addendum,** (Lindy_Nelson@ios.doi.gov)
J. Willman, Illinois EPA w/o Enf. Addendum (jerry.willman @illinois.gov)
Dave Graham, CDPH **w/o Enf. Addendum** (Dave.Graham@cityofchicago.org)

BCC PAGE HAS BEEN REDACTED

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ENFORCEMENT ADDENDUM

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ENFORCEMENT CONFIDENTIAL

NOT SUBJECT TO DISCOVERY

FOIA EXEMPT

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

Figure 1
Site Location
127th Street Soil Site, Chicago, Cook County, Illinois

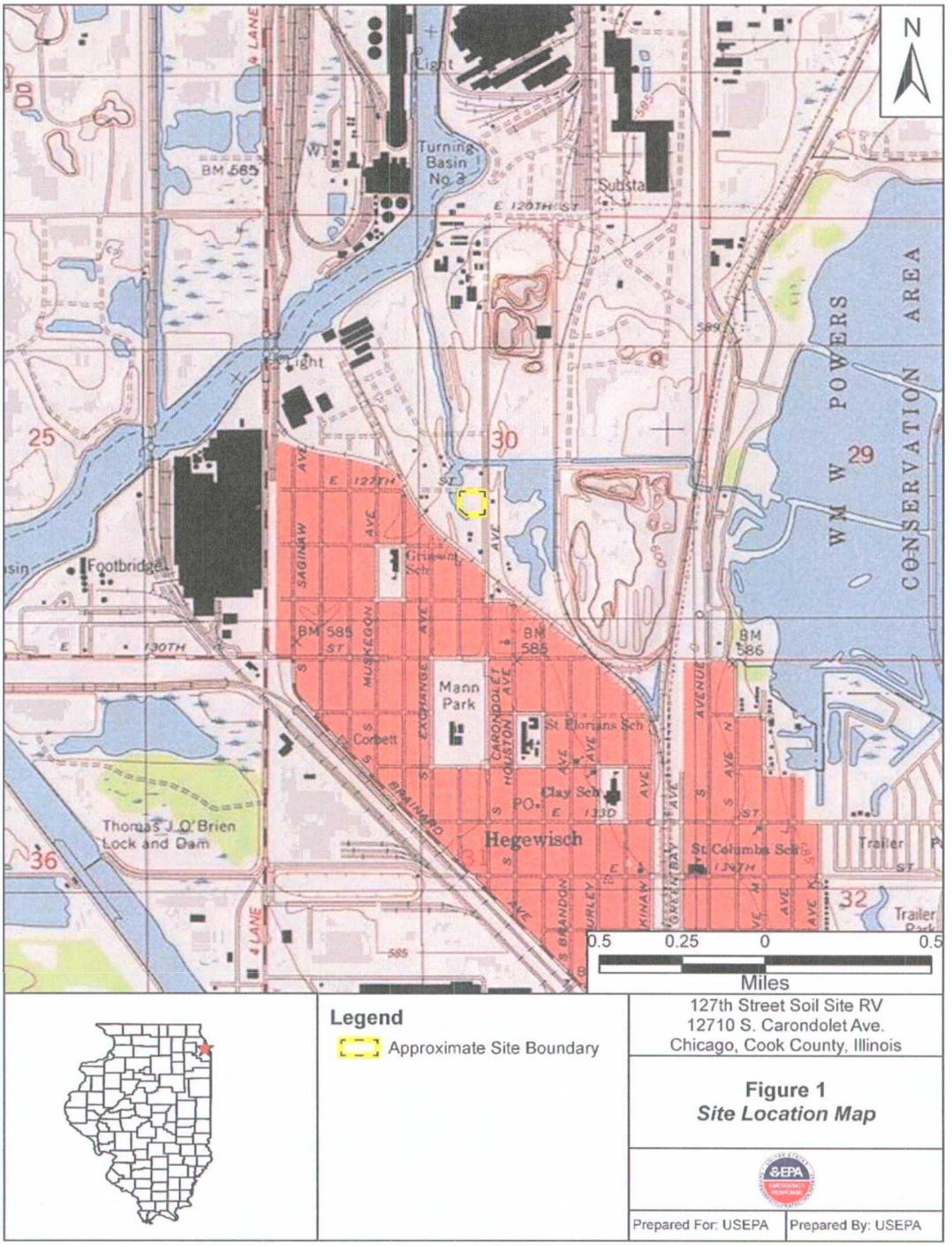


Figure 2
Site Layout
127th Street Soil Site, Chicago, Cook County, Illinois

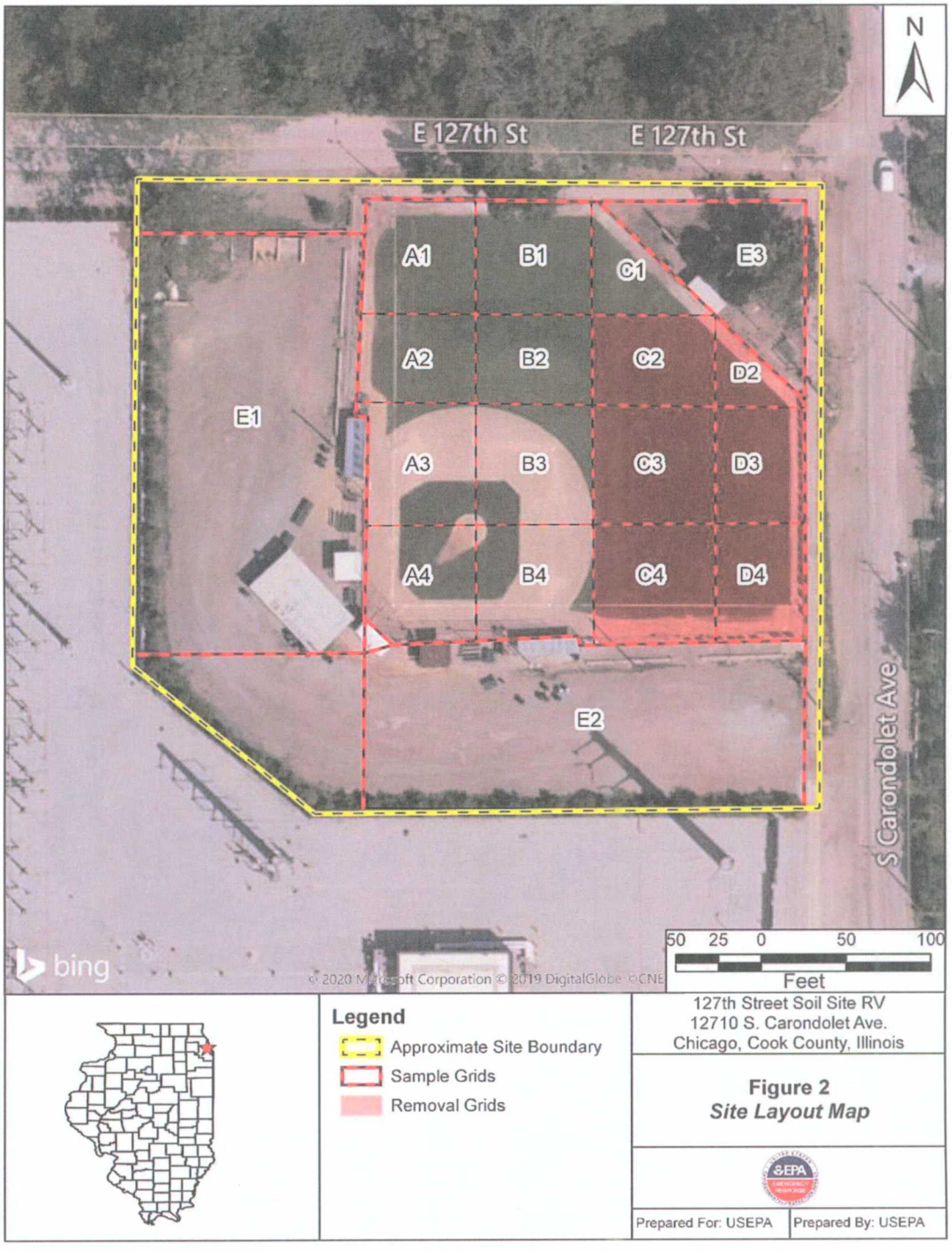


Table 1
Summary of Soil Sampling Data and Comparison to Removal Management Levels
127th Street Soil Site, Chicago, Cook County, Illinois

Analytical results for soil samples collected at the Hegewisch Little League Baseball Field as a part of the Watco Terminal site evaluation.		Compounds	Arsenic	Lead	Manganese
		Analytical Method	6010C	6010C	6010C
		Residential RML	68 mg/kg	400 mg/kg	5,500 mg/kg
		Result units	mg/kg	mg/kg	mg/kg
Grid	**Depth (Inches)**	**Date Collected**	**Arsenic Result**	**Lead Result**	**Manganese Result**
A1	0-6	9/18/2019	5.3	150	1020
	6-12	9/18/2019	5.5	113	626
A2	0-6	9/18/2019	6.7	76.3	839
	6-12	9/18/2019	5.8	87.2	845
A3	0-6	9/18/2019	5	12.4	368
	6-12	9/18/2019	9	74	285
A4	0-6	9/18/2019	4.7	18.1	298
	6-12	9/18/2019	7.7	47.4	283
B1	0-6	9/18/2019	10.3	121	634
	6-12	9/18/2019	8.2	89.8	1820
B2	0-6	9/18/2019	9.1	114 J-	644 J-
	6-12	9/18/2019	8.6 J	84.6	452
	6-12-D	9/18/2019	5.1 J	66.6	697
B3	0-6	9/18/2019	5.3	55.4	368
	6-12	9/18/2019	11.2	109	355
B4	0-6	9/18/2019	7.9	57.5	307
	6-12	9/18/2019	31.5	240	368
C1	0-6	9/18/2019	7.1	68.6	613
	6-12	9/18/2019	5.2	62.7	483
C2	0-6	9/18/2019	27.4	377	954
	6-12	9/18/2019	30.3	515	700
C3	0-6	9/18/2019	41.6 J	508	660 J
	6-12	9/18/2019	40.4	461	340
C4	0-6	9/18/2019	141	428	576
	6-12	9/18/2019	85.1	399	211

Analytical results for soil samples collected at the Hegewisch Little League Baseball Field as a part of the Watco Terminal site evaluation.		Compounds	Arsenic	Lead	Manganese
		Analytical Method	6010C	6010C	6010C
		Residential RML	68 mg/kg	400 mg/kg	5,500 mg/kg
		Result units	mg/kg	mg/kg	mg/kg
Grid	**Depth (Inches)**	**Date Collected**	**Arsenic Result**	**Lead Result**	**Manganese Result**
D2	0-6	9/18/2019	22.5	227	402
	6-12	9/18/2019	42.9	435	308
D3	0-6	9/18/2019	70.2	548	426
	6-12	9/18/2019	136	581	244
D4	0-6	9/18/2019	87.6	608	530
	0-6-D	9/18/2019	169	554	441
	6-12	9/18/2019	99.8	686	287
E1	0-6	9/18/2019	4.7	84.1	2200
E2	0-6	9/18/2019	2.9	50.2	1070
E3	0-6	9/18/2019	4.1	229	99.2

Notes:

	Analytes that exceed the Removal Management Level are shaded.
D	Field duplicate sample
J	The analyte was positively identified; the associated value is the approximateconcentration of the analyte in the sample.
J-	The analyte was positively identified; the associated value is the approximateconcentration of the analyte in the sample and may be biased low.
mg/kg	Millgrams per kilogram
RML	EPA Removal Management Level (Based on a Target Risk level of 10e-4 for carcinogens or a Hazard Quotient [HQ] of 3 for non-carcinogens. Can be found online at: https://www.epa.gov/risk/regional-removal-management-levels-chemicals-rmls).

Attachment I

U.S. Environmental Protection Agency Removal Action

Environmental Justice (EJ) Screen for the 127th Street Soil Site Chicago, Cook County, Illinois

Original- January 2020

EPA United States Environmental Protection Agency

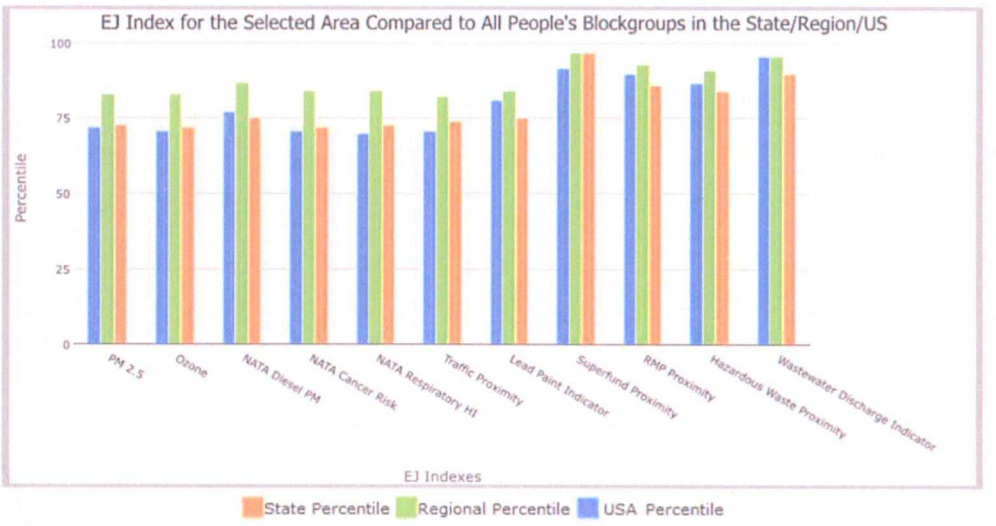
EJSCREEN Report (Version 2019)

0.5 miles Ring around the Area, ILLINOIS, EPA Region 5

Approximate Population: 2,945

Input Area (sq. miles): 0.89

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	73	83	72
EJ Index for Ozone	72	83	71
EJ Index for NATA* Diesel PM	75	87	77
EJ Index for NATA* Air Toxics Cancer Risk	72	84	71
EJ Index for NATA* Respiratory Hazard Index	73	84	70
EJ Index for Traffic Proximity and Volume	74	82	71
EJ Index for Lead Paint Indicator	75	84	81
EJ Index for Superfund Proximity	97	97	92
EJ Index for RMP Proximity	86	93	90
EJ Index for Hazardous Waste Proximity	84	91	87
EJ Index for Wastewater Discharge Indicator	90	96	96



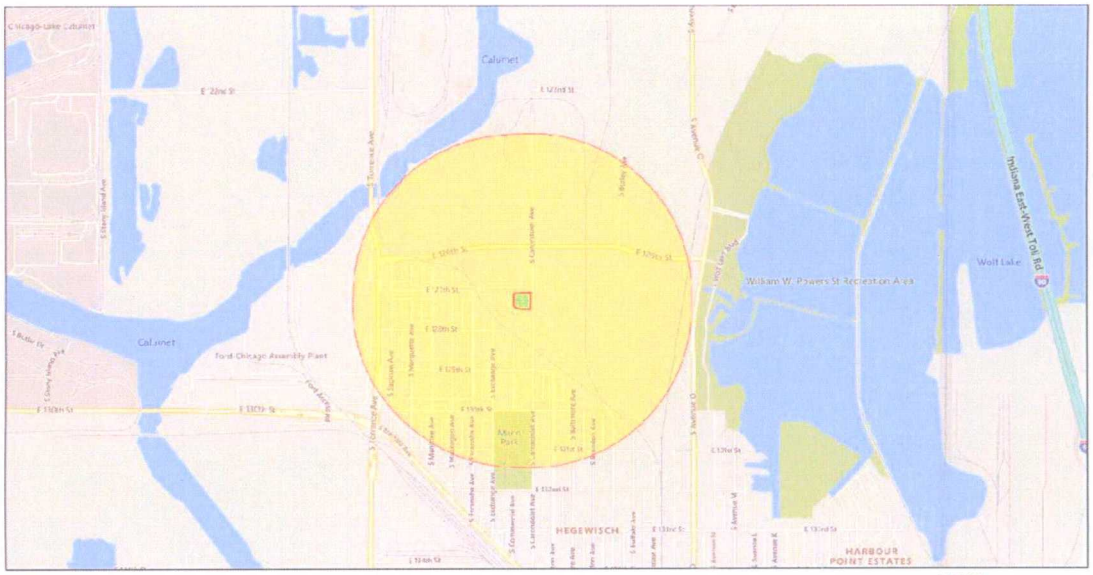
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

EJSCREEN Report (Version 2019)

0.5 miles Ring around the Area, ILLINOIS, EPA Region 5

Approximate Population: 2,945

Input Area (sq. miles): 0.89



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJSCREEN Report (Version 2019)

0.5 miles Ring around the Area, ILLINOIS, EPA Region 5

Approximate Population: 2,945

Input Area (sq. miles): 0.89

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in µg/m³)	9.69	9.25	69	8.63	89	8.3	84
Ozone (ppb)	44.9	44.8	42	43.4	62	43	62
NATA* Diesel PM (µg/m³)	0.829	0.669	72	0.446	90-95th	0.479	80-90th
NATA* Cancer Risk (lifetime risk per million)	35	33	68	26	90-95th	32	60-70th
NATA* Respiratory Hazard Index	0.45	0.42	62	0.34	80-90th	0.44	50-60th
Traffic Proximity and Volume (daily traffic count/distance to road)	230	630	53	530	57	750	51
Lead Paint Indicator (% Pre-1960 Housing)	0.39	0.41	50	0.38	58	0.28	69
Superfund Proximity (site count/km distance)	0.65	0.095	98	0.13	96	0.13	96
RMP Proximity (facility count/km distance)	3.8	1.2	94	0.82	97	0.74	97
Hazardous Waste Proximity (facility count/km distance)	5.3	2	89	1.5	93	4	91
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.65	1.7	82	0.82	93	14	94
Demographic Indicators							
Demographic Index	45%	34%	70	28%	80	36%	69
Minority Population	62%	38%	75	25%	87	39%	74
Low Income Population	28%	30%	53	31%	51	33%	47
Linguistically Isolated Population	8%	5%	78	2%	89	4%	80
Population With Less Than High School Education	11%	11%	59	10%	64	13%	54
Population Under 5 years of age	6%	6%	53	6%	54	6%	52
Population over 64 years of age	15%	14%	58	15%	53	15%	57

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: https://www.epa.gov/national-air-toxics-assessment.

For additional information, see: www.epa.gov/environmentaljustice

ATTACHMENT II

DETAILED CLEANUP CONTRACTOR ESTIMATE

HAS BEEN REDACTED – ONE PAGE

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ATTACHMENT III

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR THE
127TH STREET SOIL SITE
CHICAGO, COOK COUNTY, ILLINOIS

ORIGINAL
JANUARY, 2020
SEMS ID:

NO.	SEMS ID	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	953168	8/1/07	Agency for Toxic Substances and Disease Registry (ATSDR)	General Public	Toxicological Profile for Arsenic	559
2	953164	1/30/19	Durbin, R. and Duckworth, T., U.S. Senate	Stepp, C., U.S. EPA	Letter - Air and Soil Sampling	2
3	953166	5/1/19	Agency for Toxic Substances and Disease Registry (ATSDR)	General Public	Toxicological Profile for Lead - Draft for Public Comment	561
4	953162	1/6/20	Miller, K., U.S. EPA	Willman, J., Illinois EPA	ARAR Request	2
5	953165	1/7/20	Schendel, J., Tetra Tech	Miller, K., U.S. EPA	Data Validation Reports	29
6	953163	1/22/20	Willman, J., Illinois EPA	Miller, K., U.S. EPA	ARAR Response	3
7	_____	_____	Miller, K., U.S. EPA	Ballotti, D. and Borries, S., U.S. EPA	Action Memorandum Re: Request for Approval and Funding of a Time-Critical Removal Action	_____

ATTACHMENT IV

INDEPENDENT GOVERNMENT COST ESTIMATE

HAS BEEN REDACTED – THREE PAGES

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION