Chicago, Illinois: Celotex Corporation Superfund Site
Situation Assessment and Meeting Summary
May 2006

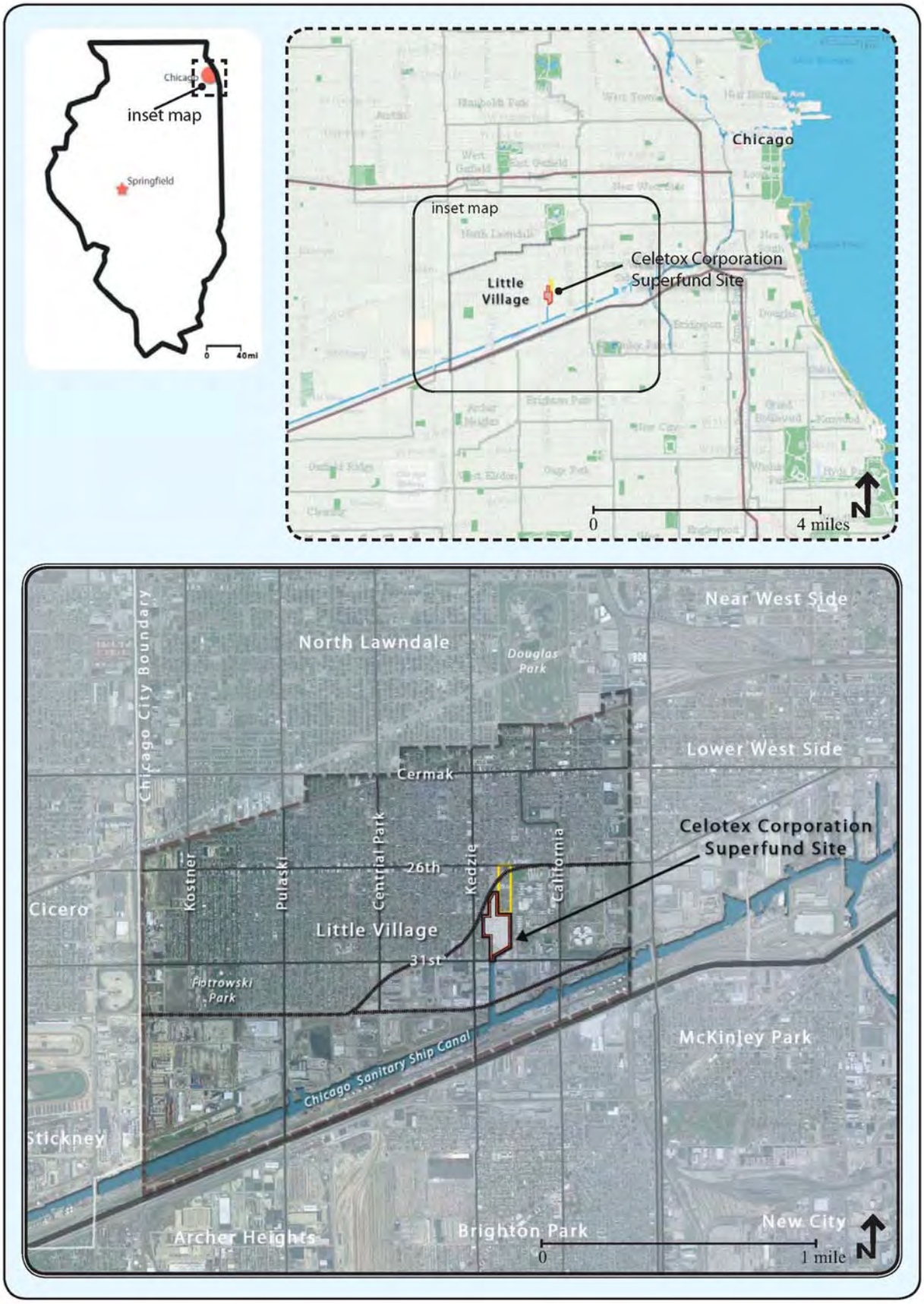
On April 18, 2006, EPA Region 5 hosted a site visit and meeting for the Celotex Corporation Superfund site in Community Area 30, also known as Chicago's La Villita ("Little Village") or South Lawndale neighborhood. The purpose of the site visit and meeting was for EPA site staff to meet with representatives from the City of Chicago and site PRP Honeywell International Inc. to gather information and spur ongoing discussions regarding future use considerations at the Celotex Corporation Superfund site. This information can inform ongoing response activities at the site and ensure the protectiveness of the site's remedy as the site is returned to use. The Celotex Corporation Superfund site has been selected as one of EPA's 2006 demonstration projects for the Agency's Return to Use Initiative, which is designed to remove barriers to appropriate reuse at over 500 Superfund sites where cleanup has been completed or is nearing completion.

EPA contractor E^2 Inc., an environmental consulting company that helps EPA, local governments, and other key stakeholders integrate future use considerations at Superfund sites, attended the April 18 site visit and meeting and developed this Situation Assessment as a summary report for EPA Region 5 and to inform site stakeholders' future activities.

Activities completed as part of the Situation Assessment include:

- conference calls with local officials, site PRP Honeywell International, and EPA site staff in March-April 2006;
- information gathering and review of community planning materials and EPA site reports; and
- April 17-18 site visit and stakeholder meeting. Invited participants included representatives from EPA Region 5, the City of Chicago's Parks District, Planning and Development Department, Department of the Environment, and Department of Law, the Little Village Board of Aldermen, and Honeywell International.

Site Location: The Little Village in Chicago, Illinois



Site Visit Findings

Site and Surrounding Land Use Summary

- The Celotex Corporation Superfund site is located in the Little Village neighborhood in Chicago's West Side. With a population of 91,000 mainly Latino residents, Little Village is known as the Mexican Capital of the Midwest. High-density residential areas, thriving commercial corridors, and active and vacant industrial areas characterize the area.
- The Celotex site is bounded to the east by S. Sacramento Avenue, to the south by 31st street, to the west by S. Albany St. and a rail line, and to the north by 27th street. A major commercial corridor is located one block north of the site, on 26th street. The site is surrounded by residential properties to the north and west, the Cook County Correctional Facility to the east, and industrial land uses to the south and southwest.
- The Little Village Community Development Corporation (LVCDC) was formed in 1990 and works with residents to plan for the community's future development. Together with LISC/Chicago's New Communities Program, a Quality-of-Life Plan was adopted in January 2005. In addition to addressing several community needs, ranging from improved health services and violence prevention, part of the community's vision is to "increase access to parks and open space by improving existing facilities and creating a large new park." Existing community parks and recreation facilities include Douglas Park, Piotrowski Park, the Little Village Lawndale High School ball fields.
- Several locations in Little Village are under consideration for future use as a park. The Celotex site is a strong candidate because of the approaching completion of response activities, its central location, lack of building structures, and close proximity to schools and residential areas. Alternate locations, like the former Washburne Trade School facility, pose multiple challenges, including building demolition, remote location, and potential contamination.

Reuse Planning Status

- *While the main portion of the Celotex Corporation Superfund site is currently in use for light industrial purposes, future development of the site for recreational land uses is under consideration.* Property owner Sacramento Corporation (Sacramento Corp.) placed two feet of gravel on 22 acres of the site in 2002 to support the area's current use as a truck parking lot and storage area. Palumbo Corporation et al. (Palumbo Corp.) owns the site's remaining two acres, which were not covered with gravel and are not currently in use. The City of Chicago intends to make an offer this year to purchase both parcels comprising the Celotex site, and has expressed significant interest in developing the 24-acre site into a recreational area with sports fields and playgrounds for the Little Village neighborhood. The Little Village Community Development Corporation supports the development of recreational uses at the site.

- *Recreational land use considerations have not informed the development of response actions taken at the site to date. However, these considerations could significantly inform remaining response actions.* Site PRP Honeywell International's remaining responsibilities include capping the edges of the 22-acre graveled area and capping the vacant two-acre portion of the site. Consideration of the characteristics of recreational facilities as part of the design, timing, and materials used for these activities could reduce site preparation costs for the City of Chicago and could also result in a more efficient, lower cost response approach.

- *Several obstacles will likely need to be addressed in order for the Celotex site to be used for recreational purposes.* First, the City of Chicago will not be able to close on the purchase of site properties until it completes its due diligence at the site and EPA clarifies whether the site's remedy is supportive of recreational land uses as well as industrial land uses. Second, the contents of the existing gravel cap will need to be sampled and analyzed before the acquisition can go forward; the City intends to comply with Illinois EPA's Tiered Approach to Corrective Action Objectives (TACO).[1] Third, the City may need to address funding for the development of the park; the City indicated that at least 12 inches of clean fill would likely need to be placed on top of the gravel cap to comply with City and TACO Tier 1 (residential) standards.

Stakeholder Interests and Site Reuse

City of Chicago

- *Spurred by strong community interest, the City of Chicago is working to acquire and reuse the Celotex Corporation Superfund site, but will need assistance from EPA Region 5 and could benefit from assistance from site PRP Honeywell International.* The City of Chicago has sent letters of intent to the site's two owners, Sacramento Corp. and Palumbo Corp. and plans to offer approximately $4 million for both parcels.

  Four primary concerns will likely need to be addressed to enable the City of Chicago's plans to reuse the Celotex Corporation Superfund site for recreational land uses:

  - First, EPA will need to clarify for the City whether the site's remedy will support recreational land uses; the site's risk assessment assumes that the site will be reused for commercial/industrial land uses.
  - Second, the City would like to purchase the site in a condition that meets City and TACO residential and recreational guidelines. Honeywell International is obligated under the site's Action Memorandum to remediate the site to EPA commercial/industrial standards.
  - Third, EPA will need to confirm that the City will not incur any future liability under CERCLA if it acquires the two site properties under consideration.
  - Fourth, the City will need to identify funding resources for site preparation, construction and maintenance of a new park. City representatives estimate that site preparation and construction costs could approach $1 million per acre.

Honeywell International

- *Honeywell International indicated a willingness to coordinate with the City of Chicago as needed on remaining response activities to support recreational reuse outcomes at the site.* Honeywell International reiterated that it will fulfill its obligations at the Celotex Corporation Superfund site, as laid out in the March 2005 Action Memorandum. In implementing

[1] Tiered Approach to Corrective Action Objectives (TACO), is the "Illinois EPA's method for developing remediation objectives for contaminated soil and groundwater. These remediation objectives protect human health and take into account site conditions and land use. Remediation objectives generated by TACO are risk-based and site-specific." www.epa.state.il.us/land/taco/1-introduction.html

remaining response actions, Honeywell International would be willing to coordinate with the City to consider the design and timeline of future reuse in capping the edges of the 22-acre graveled area and the vacant two-acre area (see Figure 1 on page 7.) For example, a clay and soil cap could be used in place of gravel for the two-acre portion of the site and the edge capping could be designed to provide for multiple community access points and to help link the site with surrounding neighborhoods. In the immediate term, Honeywell International and the City also agreed to work together to the extent possible to coordinate pending on-site activities and share site access.

- *While significant opportunities currently exist for coordination between Honeywell International and the City of Chicago, significant areas of disagreement may also arise in coming months, as the site's Consent Decree is finalized.* The City of Chicago has indicated that the purchase of the Sacramento Corp. and Palumbo Corp. properties may be contingent on their condition meeting TACO guidelines for residential use. Honeywell International has indicated that it intends to comply with its obligations under the site's 2005 Action Memorandum, which stipulates response actions that will clean up the site to a commercial/industrial standard.

Key Considerations and Potential Next Steps

- *Assuming completion of remaining response actions at the site and ongoing coordination between Honeywell International and the City of Chicago, it is still possible that the main portion of the Celotex Corporation site will not be easily reusable for recreational land uses.* While EPA may confirm the protectiveness of the gravel cap placed on this portion of the site, the City of Chicago has indicated that it will follow Illinois EPA's Tiered Approach to Corrective Action Objectives (TACO) standards for Tier 1 (residential) land uses in planning for the site's future use. Meeting participants indicated that TACO Tier 1 standards would require a three-foot cap (including the existing gravel cap). In terms of state remedial guidelines, as well as likely recreational reuse scenarios, approximately 12 inches of soil would need to be placed on top of the main, 22-acre portion of the site to enable the area's recreational reuse.

- *In contrast, the smaller, two-acre Palumbo Corp. property could provide an opportunity to phase in recreational reuse opportunities for the community at the site in the shorter-term.* Given that Honeywell International will be capping this area within the year and has indicated a willingness to work with the City of Chicago to incorporate future use considerations as part of the cap's design, it could make sense to prioritize the remediation and reuse of this area. The reuse of the area would expand limited local park resources and could also provide an opportunity for site and environmental education opportunities, so that residents can learn about the site's history, cleanup, and transition to recreational use.

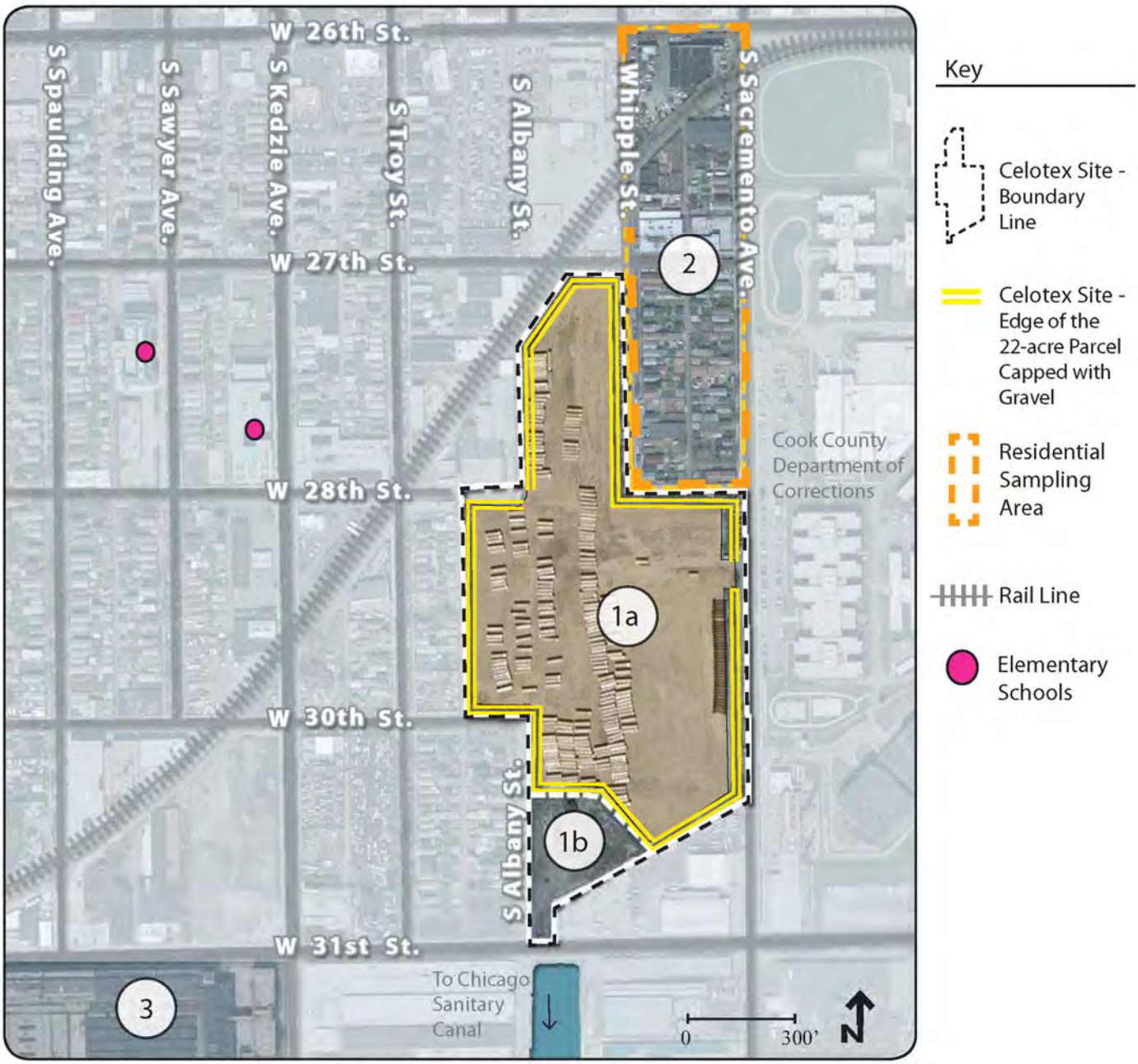
- *EPA could take several actions to help support the site's return to recreational use and ensure the protectiveness of the site's remedy.* First, EPA could clarify whether the site's remedy, as outlined in the 2005 Action Memorandum, will be protective of recreational land uses. Second, EPA could confirm that the City of Chicago will not incur any future liability under CERCLA if it acquires the two site properties under consideration. Third, EPA could consider whether issuance of a Ready for Reuse Determination (RfR) could facilitate the City's purchase and reuse of the Celotex site. The RfR could determine the site's availability for recreational reuse and serve as an informational tool for the community.

- *Once the City of Chicago has determined to move forward with the acquisition of the Celotex Corporation Superfund site, significant opportunities exist for EPA contractor E^2 Inc. to provide the City of Chicago and the Little Village neighborhood with reuse planning assistance.* Potential assistance could include the development of a community-based site reuse strategy that incorporates community and City needs and priorities as well as site and surrounding land use information, broad community outreach to ensure effective neighborhood input into site reuse plans, and the identification of partnerships and resources to help enable the Celotex site's recreational reuse.

- *Two additional tools could be used to help foster the site's recreational reuse and ensure the protectiveness of the site's remedy.* First, institutional controls and operations and maintenance responsibilities at the site remain to be finalized as part of the upcoming Consent Decree. The City of Chicago and Honeywell International could work with each other and EPA to incorporate these considerations as part of ongoing discussions to ensure that these responsibilities are tailored to reflect future site use considerations. Second, Honeywell International inquired about signing a "flexible" Consent Decree in 2006 in order to fulfill its response obligations while also supporting potential future uses at the site. EPA could work with the City of Chicago and Honeywell International to determine how the upcoming Consent Decree could best reflect the need for ongoing coordination of remedial and reuse considerations related to the edge capping of the site's 22-acre area and the capping of the site's two-acre area.

- *The City of Chicago and Honeywell International will coordinate efforts to sample the existing two-foot gravel cap on the 22-acre portion of the site*. Honeywell International is required to sample the thickness of the gravel cap to ensure that two feet of gravel covers the 22-acre portion of the site. The City expressed interest in coordinating the sampling with Honeywell in order to determine the contents of the gravel cap. Honeywell agreed to prepare and distribute a draft survey-sampling plan for review. This proposed coordination would proceed after it is determined that the joint effort is legally acceptable to both parties.

Figure 1: Map of the Celotex Corporation Superfund Site and Surroundings



Celotex Corporation Superfund Site: ***Potential Issues and Opportunities***

(1a) **Twenty-two acres owned by the Sacramento Corporation** were capped with gravel in 2002 (in brown). The source and content of the gravel is not known. Sampling and analysis will take place during summer 2006 to determine the depth and content of the gravel. The site edges (in yellow) will also be capped to ensure the protectiveness of the site's remedy. The edges could be capped and regraded to help support potential future recreational uses.

(1b) **Two acres owned by the Palumbo Corporation et al.** that has not been capped with gravel. Recreational land use considerations could hep inform the remedial design for this area.

(2) **Residential area** that will be tested for potential contamination in summer 2006. If contaminants are found, residential soils may be excavated and replaced with clean fill.

(3) **The former Washburne Trade School**, a potential alternate location for a new neighborhood park. The site poses several challenges, including building demolition, remote location, and potential contamination.