

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CHEM-PLATE INDUSTRIES, Inc.,	)	
	)	
Petitioner,	)	
	)	
v.	)	PCB 2026-052
	)	(Permit Appeal - RCRA)
ILLINOIS ENVIRONMENTAL PROTECTION	)	
AGENCY,	)	
	)	
Respondent.	)	

NOTICE OF FILING

TO: Attached Service List Via Email

PLEASE TAKE NOTICE THAT today I caused to be electronically filed with the Clerk of the Illinois Pollution Control Board, via the "COOL" System, the Respondent, Illinois Environmental Protection Agency's Certificate of Record on Appeal and Record on Appeal (R 000001-000170), true and correct copies of which are attached hereto and hereby served upon you.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Molly Kordas

Molly Kordas
Assistant Attorney General
Environmental Bureau
Office of the Illinois Attorney General
115 S. LaSalle Street, 23rd Floor
Chicago, IL 60603
773.590.7047
Molly.Kordas@ilag.gov

Dated: September 11, 2026

SERVICE LIST

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Hearing Officer
Illinois Pollution Control Board
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CERTIFICATE OF SERVICE

I, Molly Kordas, an Assistant Attorney General, caused to be served on this 11th day of September, 2026, a true and correct copies of the Notice of Filing, Certificate of Record on Appeal and Record on Appeal (R 000001-000170), upon the persons listed on the Service List via electronic mail with return receipt.

By: /s/ Molly Kordas

Molly Kordas

Assistant Attorney General

Environmental Bureau

Office of the Illinois Attorney General

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	)	
Respondent.	)	

INDEX OF RECORD ON APPEAL

Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“Illinois EPA”), in accordance with the procedural rules of the Illinois Pollution Control Board (“Board”) as set forth in 35 Ill. Adm. Code 105.212 and 105.116, files in this cause the Illinois EPA’s Administrative Record of Permit Closure Final Action, regarding the modification request pertaining to the approved closure plan at the Chem-Plate Industries, Inc. facility located 30 North 8th Avenue, Maywood, Illinois, that consists of the following documents as set out in the index below:

Category 1: Chem-Plate Submittals to Illinois EPA and Review of Cleanup Objectives (RCRA Closure Log No. C-658-M-5)

RECORD NO.	DOCUMENTS	DATE
R000001-R000008	P. Huck (Terra Nova Research, Inc.) Letter to E. Bakowski (Illinois EPA-Bureau of Land (“BOL”), Permits) re: Chem-Plate Industries, Inc. Review of Cleanup Objectives for Maywood site, dated July 25, 1997; Attachments: Site Layout and Lab Data	7-25-1997
R000009	Illinois EPA-BOL, Permits Administrative File Title Page RCRA Closure Plan, dated July 25, 1997, and received August 4, 1997	8-4-1997
R000010	Blank Page	
R000011	Illinois EPA-BOL RCRA Closure Tracking Sheet Comment, dated September 3, 1997	9-3-1997

R000012-R000023	Memorandum from M. Ahmad and J. Moore (Illinois EPA-BOL, Permits) to Illinois EPA-BOL, Cleanup Objectives Review and Evaluation Group (“CORE”) re: Chem-Plate Industries, Inc. RCRA Closure, dated September 18, 1997; Attachments: Site Location Map (Attach. 1), Site Layout Map (Attach. 2), Soil Boring Locations and Results (Attach. 3), Geologic Cross-Sections (Attach. 4), Concentrations Above Tier I Class I Values (Attach. 5), and Concentrations Above Tier I Class II Values (Attach. 6)	9-18-1997
R000024-R000051	Illinois EPA-BOL, Permits Review Notes: RCRA closure of one container storage area (S01); Attachments: RCRA Closure Tracking Sheet and Figures 1-10	
R-000052	RCRA Closure Tracking Sheet	10-15-1997
R000053-R000059	E. Bakowski (Illinois EPA-BOL, Permits) Response to A. Straus (Chem-Plate) submittal by Terra Nova Research, Inc. re: RCRA closure of hazardous waste container storage area, dated October 15, 1997; Attachment: Closure Certification Statement Form	10-15-1997

Category 2: Chem-Plate Environmental Land Use Control Submittals to Illinois EPA
(RCRA Closure Log No. C-658-M-7)

RECORD NO.	DOCUMENTS	DATE
R000060-R000071	Chem-Plate Environmental Land Use Control (“ELUC”) Information Submitted by Facility, dated December 11, 2003	12-11-2003
R000072-R000085	Chem-Plate Revised ELUC Information Submitted by Facility, dated January 16, 2004	1-16-2004
R000086-R000093	Illinois EPA-BOL, Permits ELUC Review: Review Notes, Review of Original Draft ELUC, Comments on Draft ELUC and Overall RCRA Closure Efforts at Chem-Plate Facility, and Illinois EPA Corrective Action Unit Checklist for Reviewing ELUCs	
R000094-R000103	Chem-Plate Revised ELUC Information Submitted by Facility, dated March 25, 2004	3-25-2004
R000104-R000110	Illinois EPA-BOL, Permits Review Notes re: RCRA Closure of a container storage area; Attachments: Map (Figure 1), Plant Diagram (Figure 2), and Site Layout Map (Figure 3)	

R000111-R000120	J. Munie (Illinois EPA-BOL, Permits) Response to K. Ramsay (Chem-Plate) ELUC submittal re: RCRA closure of a former hazardous waste container storage area, dated April 23, 2004; Attachments: Site Layout Map, Boundaries of Engineered Barrier, and Closure Certification Statement Form	4-23-2004
R000121	Illinois EPA-BOL Closure Tracking Sheet, dated April 29, 2004	4-29-2004

Category 3: Final Action Correspondence and Modification Request Review (RCRA Closure Log No. RCRA Closure Log No. C-658-M-12)

RECORD NO.	DOCUMENTS	DATE
R000122-000144	A. DeDolph (Ramboll) Submittal to B. Feda (Illinois EPA-BOL, Permits), dated December 29, 2025, re: Chem-Plate Industries, Inc. February 29, 2024 RCRA Closure Plan Addendum and Illinois EPA August 9, 2025 Letter; Attachments: LPC-PA18 Form (Attach. 1); Figures 1 and 2 (Attach. 2); and Engineered Barrier Inspection Form with Photographs (Attach. 3)	12-29-2025
R000145	Illinois EPA-BOL, Permit Section RCRA Tracking Sheet: Response to Illinois EPA Comments on RCRA Closure Plan Addendum, dated January 5, 2026	1-5-2026
R000146-000149	Illinois EPA-BOL, Permits Review Package: Checklist by B. Feda re: Addendum to Closure Plan, dated January 14, 2026	1-14-2026
R000150-000163	Illinois EPA-BOL, Permits Review Package: Review Notes by B. Feda (Illinois EPA-BOL, Permits) re: Response to August 8, 2025 Closure Plan Disapproval Letter, dated January 14, 2026; Attachment: September 18, 1997 Memorandum from M. Ahmad and J. Moore (Illinois EPA-BOL, Permits) to Illinois EPA-BOL, CORE re: Chem-Plate Industries, Inc. RCRA Closure	
R000164	Illinois EPA-BOL, Permits Review Package: Environmental Justice Email to Illinois EPA re: Outreach status change for Chem-Plate Industries, Inc., dated January 26, 2026	1-26-2026
R000165	Illinois EPA-BOL, Permits Review Package: Illinois EPA-BOL, Permit Section RCRA Tracking Sheet: Response to Illinois EPA Comments on RCRA Closure Plan Addendum, dated March 3, 2026	3-3-2026
R000166-000170	J. Rhoades (IEPA-Permits) Permit Closure Final Action Letter to A. Straus (Chem-Plate Industries, Inc.) responding to	3-3-2026

	Ramboll Americas Engineering Solutions Inc. submittal in response to IEPA correspondence re: interim status closure of waste container storage area at Chem-Plate facility, dated March 3, 2026; Attachment: 1997 Facility Map with Soil Data	
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Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,
ex rel. KWAME RAOUL, Attorney General
of the State of Illinois

BY: /s/ Molly Kordas
Molly Kordas
Assistant Attorney General
Illinois Attorney General's Office
Environmental Bureau
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AGENCY,	)	
	)	
Respondent.	)	

CERTIFICATE OF RECORD ON APPEAL

I, Behzad Feda, of the Illinois Environmental Protection Agency hereby certify that the Record on Appeal filed in the above-referenced matter and summarized in the attached Index of the Record on Appeal pursuant to 35 Ill. Adm. Code 105.116 and 105.212 (the "Index") is true and complete to the best of my knowledge, information, and belief.



Behzad Feda
Environmental Protection Engineer II
Illinois Environmental Protection Agency

C-658-M-5

cc: Maywood

R000001

JTCM
MA

Specializing in Phase I and Phase II Environmental Site Assessments
Underground Storage Tank Investigations & Closures
Environmental Consulting

910 Lilac Lane
Naperville, IL 60540
630/717-0633 Tel
630/717-1537 FAX

25 July, 1997

Mr. Edwin, C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land
Illinois Environmental Protection Agency
1001 N. Grand Avenue East
Springfield, Illinois 62702



re: a) 0311835009--Cook County
Chem-Plate Industries, Inc.
ILD000665372

b) Review of Cleanup Objectives Per Our Letter of 14 July 19⁹7

Dear Mr. Bakowski:

As requested (b), we wish to review the cleanup objectives for the Chem-Plate Industries, Inc. Maywood site.

Geologic Setting

The site is located at Lake St. and Eighth Ave. in Maywood, Illinois. This is in Township 39 North, Range 12 East, Section 11. Willman¹ shows this area as lying in the Lake plain deposits. Berg² gives the site an "E" classification, indicating at least 50 ft of fine-grained soils overlying any aquifers.

Our own exploratory borings went to a maximum depth of 20 feet. As noted in the Basis of Design Report³, the surfacial soils include 0.6 to two m. of mixed brown, mottled gray/brown, and black silty clays containing frequent stringers of sand, silty sand and sandy gravel. These soils are typical of the Lake plain deposits indicated by Willman.

¹ Willman, H.B., "Summary of the Geology of the Chicago Area", **Circular 460**, Ill. State Geological Survey, 1971

² Berg, R.C., Kempton, J.P., and Cartwright, K., "Potential for Contamination of Shallow Aquifers in Illinois", **Circular 532**, Ill. State Geological Survey, 1984

³ Huck, P.J., "Basis of Design Report - Chem-Plate Industries, Inc." prepared for Stone, Pogrand, Korey and Spagat, 2 Nov. 1995

Some of these surficial soils were clearly fill, and some were clearly undisturbed indigenous soils, but it was very difficult to distinguish between the two. Although some of the granular seams produced some groundwater when penetrated, the flow was limited and soon ceased. Other granular seams were dry when encountered. These permeable layers appear at different elevations in the different borings, and were altogether absent in others. Thus there appear to be no permeable seams that are continuous across the site. These facts indicate that such water as was encountered represents perched groundwater rather than a near surface aquifer.

Beneath the surficial fill and Lake plain deposits, brown silty clay was encountered. This clay transitioned to gray silty clay at a depth of about three to four meters. The gray silty clay had a permeability of 10^{-8} to 10^{-9} cm/sec.

Cultural Setting

The site itself is an industrial site, and is surrounded on the south and west by other industrial sites. Retail establishments front Lake St. to the west. Residential areas lie across Eighth Ave. to the east, and across Lake St. to the north.

The surface of the site itself is covered almost completely, either by the structure or by asphaltic concrete pavement.

Pathway Analysis

Potential migration pathways to the environment at this site include:

- Ingestion (industrial - commercial)
- Inhalation (industrial - commercial)
- Ingestion (construction worker)
- Inhalation (construction worker)

The migration to groundwater pathway is not applicable to this site. As noted above, there is no groundwater in the surficial soils except for small volumes of perched waters in isolated, non-continuous seams. The site is underlain by impermeable gray silty clay. All exploration borings indicate that the contamination is generally lying on top of this dense, impermeable soil. The maximum depth to clean soil was 15 feet.

Table I displays the TACO Tier 1 soil cleanup objectives and the maximum concentration encountered on the site for each of the four compounds under consideration. It can be seen that the maximum concentration of cis 1,2 dichloroethylene encountered on the site is less than the Tier 1 soil cleanup objectives. It is therefore proposed that this compound be dropped from the cleanup program.

The remaining three compounds are carcinogens. If engineered barriers are placed on the site, the soil cleanup objectives may be increased by a factor of 100, equivalent to increasing the risk of cancer from 10^{-6} to 10^{-4} . Review of Table I indicates that the only compound that exceeds the elevated soil cleanup objective is trichloroethylene. The elevated soil cleanup objective for trichloroethylene would be 4000 mg/Kg, corresponding to the inhalation pathway for industrial / commercial workers.

Table I - Tier 1 Soil Cleanup Objectives

	Max on site	Industrial - Commercial		Construction Worker	
		Ingestion	Inhalation	Ingestion	Inhalation
cis 1,2 Dichloroethylene	16.6	20,000	1200 1500	20,000	1500
Tetrachloroethylene	163	110	1720	1600	47
Trichloroethylene	1100	520	48.9	7500	42
Vinyl Chloride	0.059	3	0.003 0.06	43	0.1

Table II displays the maximum compound concentration encountered across all borings as a function of boring depth. Here, it can be seen that trichloroethylene exceeds the elevated TACO 1 soil cleanup objective only at eight to ten ft sampling interval.

Table II - Maximum Concentrations Vs. Depth

Compound	1-3	3-5	6-8	8-10	11-13	13-15	TACO 1
cis 1,2 Dichloroethylene	0.189	0.561	0.592	16.600	0.394	0.017	1500 1200
Tetrachloroethylene	0.009	1.320	7.250	649.000	0.000	0.278	1720
Trichloroethylene	0.008	0.457	3.060	1100	0.048	0.351	48.9
Vinyl Chloride	0.090	0.045	0.000	0.069	0.017	0.008	0.003 0.06

We have attached a listing of all analytical testing conducted on this site. Reviewing these data reveal that:

1. No samples containing compound concentrations exceeding the TACO Tier 1 soil cleanup objectives were encountered outside the building⁴
2. Compound concentrations exceeding the elevated TACO Tier 1 soil cleanup objectives were encountered inside the building in borings C-6 and C-8, and these were both in the eight to ten ft sampling interval.

Summary

We suggest that the pathway to groundwater is not present at this site. This is based upon the observations that:

1. The gray silty clay encountered at a depth of about 10 ft has measured permeabilities in the range 10^{-9} cm/second.
2. Although the contaminants have probably been on site for years, they have not penetrated significantly into the gray silty clay. The maximum depth to clean soil was 15 feet.
3. There is no permeable layers in the near-surface soils which are consistent across the site. The few wet sand lenses that were encountered ran dry after making a few gallons of water. Sand lenses, wet or dry, occurred at different elevations in different borings, and many of the borings did not encounter

⁴ Borings designated with a "B" prefix were taken outside the building, while those designated with a "C" prefix were taken inside the building

sand lenses at all. These points all argue that there is not a near-surface aquifer on the site.

For all of these reasons, we suggest that the path to groundwater does not exist on this site.

No borings on the outside of the building encountered compound concentrations that exceeded the TACO Tier 1 soil cleanup objectives.

Two borings inside the building encountered trichloroethylene concentrations that were more than 100 times the TACO Tier-1 soil cleanup objectives for industrial - commercial workers. These were both below a concrete floor and further covered by eight feet of soil.

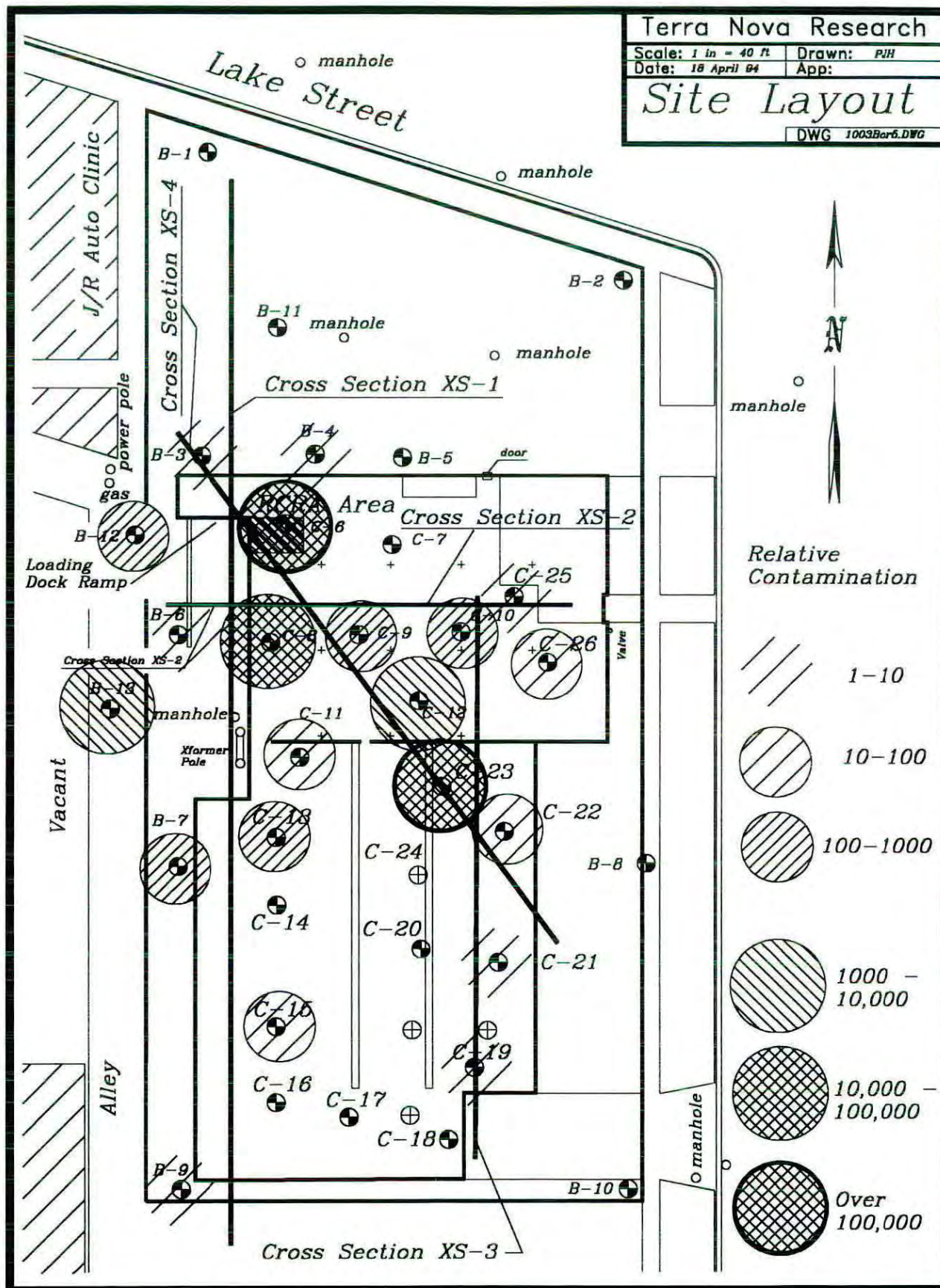
Therefore, we request that the Agency consider the existing concrete floors plus eight ft of overlying clay as constituting engineered barriers and issuing a no further action letter.

Please do not hesitate to contact us should you have any comments or suggestions in this matter. Again, I apologize for the delay in responding to your original request.

Respectfully submitted,
for Terra Nova Research, Inc.

Peter Jay Huck, P.E.
Consultant.

copy: Christopher Nowotarski, Stone, Poggrund, Korey & Spagat



Lab Data

	B-1	B-2	B-3	B-4	B-5	B-6	B-7	B-8	B-9	B-10	B-11	B-12
1-3												
Vinyl Chloride												
c-1,2-Dichloroethene												
Trichloroethene												
Tetrachloroethene												
3-5												
Vinyl Chloride	-	-	-	-	-	-	-	-	-	-	-	-
c-1,2-Dichloroethene	-	-	0.041	0.301	-	0.525	-	-	-	-	0.008	0.267
Trichloroethene	-	-	0.130	0.008	-	0.011	0.005	-	-	-	-	0.457
Tetrachloroethene	-	-	0.026	-	-	-	-	-	0.007	-	-	1.320
6-8												
Vinyl Chloride							-		-		-	
c-1,2-Dichloroethene							0.098		-		-	
Trichloroethene							1.130		-		-	
Tetrachloroethene							-		-		-	
8-10												
Vinyl Chloride			-	-		-	-		-		-	-
c-1,2-Dichloroethene			-	-		0.347	-		-		-	-
Trichloroethene			-	0.005		0.007	-		-		-	-
Tetrachloroethene			-	-		-	-		-		-	-
11-13												
Vinyl Chloride												-
c-1,2-Dichloroethene												-
Trichloroethene												-
Tetrachloroethene												-
13-15			-									
Vinyl Chloride			-	-		-						-
c-1,2-Dichloroethene			0.015	-		-						-
Trichloroethene			-	0.007		-						-
Tetrachloroethene				-		-						-

Lab Data

	B-13	C-6	C-7	C-8	C-9	C-10	C-11	C-12	C-13	C-14	C-15	C-16
1-3												
Vinyl Chloride											0.090	-
c-1,2-Dichloroethene											0.189	-
Trichloroethene											0.008	-
Tetrachloroethene											-	-
3-5												
Vinyl Chloride	-	0.025	-	-	-	-	-	-	-	-	-	-
c-1,2-Dichloroethene	0.561	0.034	-	0.268	0.211	0.138	-	-	-	-	-	-
Trichloroethene	-	-	-	-	0.154	0.032	0.044	-	-	-	-	-
Tetrachloroethene	-	-	-	-	-	-	0.261	-	0.015	-	-	-
6-8												
Vinyl Chloride								-				
c-1,2-Dichloroethene								0.592				
Trichloroethene								3.060				
Tetrachloroethene								7.250				
8-10												
Vinyl Chloride	-	-		-	-	0.059	-		-	-		
c-1,2-Dichloroethene	10.100	10.400		16.600	9.260	15.000	0.120		0.663	0.009		
Trichloroethene	47.300	1100.000		407.000	4.650	4.930	-		0.549	-		
Tetrachloroethene	4.450	416.000		149.000	-	-	-		0.965	-		
11-13												
Vinyl Chloride	-	-		-	-		-		-	-		
c-1,2-Dichloroethene	-	-		0.006	-		-		-	-		
Trichloroethene	-	-		0.048	-		-		-	-		
Tetrachloroethene	-	-		-	-		-		-	-		
13-15												
Vinyl Chloride	-					-	-		-			
c-1,2-Dichloroethene	-					0.017	-		-			
Trichloroethene	-					-	-		-			
Tetrachloroethene	-					-	-		-			

Lab Data

	C-17	C-18	C-19	C-20	C-21	C-22	C-23	C-25	C-26	MAX	TACO-1
1-3											
Vinyl Chloride	-	-		-						0.090	0.003 - 0.3
c-1,2-Dichloroethene	-	-		-						0.189	1500
Trichloroethene	-	-		-						0.008	4 - 400
Tetrachloroethene	-	0.009		-						0.009	17 - 1700
3-5											
Vinyl Chloride	-	-	-	-	-	0.045	-	-	-	0.045	0.003 - 0.3
c-1,2-Dichloroethene	-	-	-	-	0.005	0.068	0.023	-	0.128	0.561	1500
Trichloroethene	-	-	-	-	-	0.034	0.039	-	0.048	0.457	4 - 400
Tetrachloroethene	-	-	0.005	-	0.053	0.016	0.664	0.029	-	1.320	17 - 1700
6-8											
Vinyl Chloride								-		0.000	0.003 - 0.3
c-1,2-Dichloroethene								0.094		0.592	1500
Trichloroethene								-		3.060	4 - 400
Tetrachloroethene								-		7.250	17 - 1700
8-10											
Vinyl Chloride			-		-	0.069	-	-	0.008	0.069	0.003 - 0.3
c-1,2-Dichloroethene			0.064		0.008	1.120	0.785	-	1.070	16.600	1500
Trichloroethene			0.016		-	0.043	176.000	-	0.062	1100.000	4 - 400
Tetrachloroethene			0.014		-	-	649.000	-	-	649.000	17 - 1700
11-13											
Vinyl Chloride			-		-	0.017				0.017	0.003 - 0.3
c-1,2-Dichloroethene			-		-	0.394				0.394	1500
Trichloroethene			-		-	0.011				0.048	4 - 400
Tetrachloroethene			-		-	-				0.000	17 - 1700
13-15											
Vinyl Chloride			-		-	-	-		0.008	0.008	0.003 - 0.3
c-1,2-Dichloroethene			-		-	-	-		0.017	0.017	1500
Trichloroethene			-		-	-	0.351		-	0.351	980
Tetrachloroethene			-		-	-	0.278		-	0.278	17 - 1700

0311835009--Cook County
Chem-Plate Industries, Inc.
ILD000665372
Log No. C-658-M-5
Received: August 4, 1997
RCRA Closure

Remove Page 3-81 and replace with the attached Page 3-81.

Maywood

MA

CLOSURE LOG # : 658-M-5
 FACILITY : CHEM PLATE IND INC
 STATE ID # : 0311835009
 FED ID # : ILD000665372
 STATUS : A
 TYPE :
 NOTIFY RPMS : N

LOCATION : MAYWOOD
 COUNTY : COOK
 REVIEWER : MA
 GAU REVIEWER :
 NOTIFY FOS : Y
 NOTIFY CMS : Y
 PN : NA

RECEIVED
 ENVIRONMENTAL PROTECTION AGENCY

SEP 02 1997

BUREAU OF LAND POLLUTION CONTROL
 STATE OF ILLINOIS

1st-RECD : 97/08/04
 90-DUE : 97/11/02
 1-MAILED :
 APP or REJ :

INSP :
 2nd-SCHED :
 2nd-RECD :
 60-DUE : **
 E-MAILED :

CERTIFICATION DUE :

CLOSED :

UNITS CLOSED : S01
 UNITS REMAIN : NONE
 G OR T STATUS:

SR: 90 SR2: 60 RP: 90 RP2: ** RP3: **

COMMENTS : Did they ever steam clean + triple rinse storage area? Not familiar enough w/ TACO to comment

REVIEW TIME: REVIEW TIME2: REVIEW TIME3: PRP: PRP2: PRP3: TALK 9-3-97

CONTAM SOIL-Y/N/? : Y ABOVE PQL-Y/N/? : Y ABOVE CUO-Y/N/? : Y
 CONTAM-VO/SVO/M/? : VO
 CONTAM GW-Y/N/? : ? ABOVE PQL-Y/N/? : ? ABOVE CUO-Y/N/? : ?
 CONTAM-VO/SVO/M/? : ?

REMEDICATION-PROP/IN PROG/COMPLETE/NA:

VOLUME:

UNIT-T/CY:

SOIL VENT-Y/N: AERATE-Y/N/ON/OFF: STABILIZE-Y/N/ON/OFF:
 CAP IN PLACE-Y/N: BIOREM-Y/N: INCIN-Y/N/ON/OFF:
 LANDFILL-Y/N/ON/OFF: TREATMENT-Y/N/ON/OFF: PUMP & TREAT GW-Y/N:

PROCESS	AMOUNT	UNIT	ADD/DEL
PROCESS 1: S01	AMOUNT 1: 385	UNIT1: G	ADD/DEL: DEL
PROCESS 2:	AMOUNT 2:	UNIT2:	ADD/DEL:
PROCESS 3:	AMOUNT 3:	UNIT3:	ADD/DEL:
PROCESS 4:	AMOUNT 4:	UNIT4:	ADD/DEL:
PROCESS 5:	AMOUNT 5:	UNIT5:	ADD/DEL:
PROCESS 6:	AMOUNT 6:	UNIT6:	ADD/DEL:

REMEDIED ACREAGE:

- 1) COMPLETE CLOSURE CHECKLISTS (2 FOR NEW CLOSURE PLANS)
- 2) CALL FOS & MAKE SURE THESE ARE CORRECT AREAS TO CLOSE
- 3) STORAGE AREA INTEGRITY (CRACKS, GAPS, JOINTS, CURBS, ETC.)
- 4) STORAGE AREA RUNOFF/DRAINAGE
- 5) SAMPLING PARAMETERS W.R.T. WASTES MANAGED
- 6) SAMPLING METHODS AND LOCATIONS AND DEPTHS
- 7) ANALYTICAL METHODS (SW-846)
- 8) REVIEW NOTES
 - a. Intro to Project -- Site name, location, brief description of submittal
 - b. Pertinent Site History
 - c. Summary/Review/Evaluation of Submittal
 - d. Identification of Final Action to be Taken
 - e. Discussion of Final Action, Including Discussion of Final Letter
- 9) COMPUTER BLANKS
- 10) OCS SUBMITTAL BY _____
- 11) FINAL DRAFT & REVIEW NOTES TO MGR BY _____
- 12) FINAL TO MGR FOR LWE SIGNATURE BY _____

MEMORANDUM

DATE: September 18, 1997

TO: CORE

FROM: Munib Ahmad and Jim Moore (BOL-Permits)

SUBJECT: 0311835009--Cook
Chem-Plate Industries, Inc.
RCRA Closure

1.0 Recommendation Requested From CORE

This is a request for a site-specific soil cleanup objectives for RCRA closure of a hazardous waste container storage area at the Chem-Plate facility, located in Maywood, Illinois. The Permit Section recommends that the migration to groundwater route at the site be addressed through the use of an engineered barrier and an institutional control to achieve a "No Further Remediation" designation for this project. The engineered barrier and institutional control are being used to eliminate the inhalation and ingestion pathways.

2.0 Background

Description of the Facility

Chem-Plate Industries was an electroplater which utilized nickel, copper, zinc, cadmium, and chrome in their cyanide bearing processes. The facility is located in Section 2, Township 39 North, Range 12 East of the third Principal Meridian in Cook County, Illinois. A topographic map showing the location of the facility is included as **Attachment 1**. Perchloroethylene was used at the facility to degrease the items to be plated.

Description of the Hazardous Waste Management Unit

Chem-Plate is undergoing RCRA Closure of one (1) indoor container storage area (SO1). The subject storage area is located in the northwest corner of the facility. The size of the storage area is about 10 ft by 15 ft and it has a concrete floor. The location of the container storage area is shown in **Attachment 2**. A RCRA inspection was conducted on March 26, 1992 of the facility. During this inspection, this unit was cited for storage of seven (7) drums of perchloroethylene waste for longer than 90 days.

Chem-Plate Industries (CORE Submittal)

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3.0 Environmental Media

Soil is the environmental media of concern at the site. The extent of contamination has been defined at the site and is shown on **Attachment 3**. The vertical extent of contamination extends to a depth of 8 to 10 feet. The contaminants of concern at the site are trichloroethene, tetrachloroethene, cis-1,2-dichloroethene, and vinyl chloride.

4.0 Geology/Hydrogeology of the Site

Based on the information obtained from the Geologic Susceptibility Map contained in the 1984 ISGS publication "Potential for Contamination of Shallow Aquifers in Illinois", the surficial geology in this location is described as "*Uniform, relatively impermeable silty or clayey till at least 50 ft thick; no evidence of interbedded sand and gravel*".

The geologic cross-sections included as **Attachment 4** indicates that the shallow geology at the site consists of fill material which is about two to six feet in thickness. The fill material is comprised of mixed brown, mottled gray/brown and black silty clay. Beneath the fill lies a layer of brown/gray mottled silty clay, overlying a layer of brown silty clay. This extends from the bottom of the fill to a depth of ten to twelve feet. The underlying material is the gray silty clay.

Frequent stringers of sand, silty sand and sandy gravel were found in the indigenous brown and brown/gray mottled silty clay. Groundwater table was not encountered up to 20 ft depth. The facility performed permeability test of two samples of gray clay collected from two soil borings. The permeability was measured as 9.84×10^{-9} cm/s and 1.23×10^{-8} cm/s. The City of Maywood receives drinking water from the Lake Michigan.

5.0 Tier 1 EvaluationMigration to Groundwater Route

- The exceedances above the Tier 1 Class I cleanup objectives are identified below and are also depicted on **Attachment 5**.

Boring	Depth Interval	Constituent	Concentration (mg/kg)	Tier 1 Class I Value (mg/Kg)
C6	3'-5'	Vinyl Chloride	0.025	0.01
		cis-1,2-DCE	10.4	0.4
	8'-9'	Trichloroethene	1100	0.06
		Tetrachloroethene	410	0.06
C8	8'	cis-1,2-DCE	16.6	0.4
		Trichloroethene	400	0.06
		Tetrachloroethene	150	0.06

Chem-Plate Industries (CORE Submittal)

Page 3

Boring	Depth Interval	Constituent	Concentration (mg/kg)	Tier 1 Class I Value (mg/kg)
C9	3'-5'	Trichloroethene	0.154	0.06
	8'-10'	cis-1,2-DCE Trichloroethene	9.26 4.65	0.4 0.06
C10	8'-10'	Vinyl Chloride	0.059	0.01
		cis-1,2-DCE	15	0.4
		Trichloroethene	4.93	0.06
C11	3'-5'	Tetrachloroethene	0.261	0.06
C12	7'-8'	cis-1,2-DCE	0.592	0.4
		Trichloroethene	3.06	0.06
		Tetrachloroethene	7.25	0.06
C13	8'-10'	Trichloroethene	0.549	0.06
		Tetrachloroethene	0.965	0.06
C15	1'-3'	Vinyl Chloride	0.09	0.01
C22	3'-5'	Vinyl Chloride	0.045	0.01
	8'-10'	Vinyl Chloride	0.069	0.01
		cis-1,2-DCE	1.12	0.4
	11'-13'	Vinyl Chloride	0.017	0.01
C23	3'-5'	Tetrachloroethene	0.664	0.06
	8'-10'	Trichloroethene	0.176	0.06
		Tetrachloroethene	0.649	0.06
	13'-15'	Trichloroethene Tetrachloroethene	0.351 2.78	0.06 0.06
B3	3'-5'	Trichloroethene	0.13	0.06
B6	3'-5'	cis-1,2-DCE	0.525	0.4
B7	6'-8'	Trichloroethene	1.13	0.06
B12	3'-5'	Trichloroethene	0.47	0.06
		Tetrachloroethene	1.32	0.06
B13	3'-5'	cis-1,2-DCE	0.561	0.4
	8'-10'	cis-1,2-DCE	10.1	0.4
		Trichloroethene Tetrachloroethene	47.3 4.45	0.06 0.06

Chem-Plate Industries (CORE Submittal)

Page 4

- The exceedances above the Tier 1 Class II cleanup objectives are identified below and are also depicted on **Attachment 6**.

Boring	Depth Interval	Constituent	Concentration (mg/kg)	Tier 1 Class II Value (mg/Kg)
C6	8'-9'	cis-1,2-DCE	10.4	1.1
		Trichloroethene	1100	0.3
		Tetrachloroethene	410	0.3
C8	8'	cis-1,2-DCE	16.6	1.1
		Trichloroethene	400	0.3
		Tetrachloroethene	150	0.3
C9	8'-10'	cis-1,2-DCE	9.26	1.1
		Trichloroethene	4.65	0.3
C10	8'-10'	cis-1,2-DCE	15	1.1
		Trichloroethene	4.93	0.3
C12	7'-8'	Trichloroethene	3.06	0.3
		Tetrachloroethene	7.25	0.3
C13	8'-10'	Trichloroethene	0.549	0.3
		Tetrachloroethene	0.965	0.3
C15	1'-3'	Vinyl Chloride	0.09	0.07
C23	3'-5'	Tetrachloroethene	0.664	0.3
	8'-10'	Tetrachloroethene	0.649	0.3
	13'-15'	Tetrachloroethene	2.78	0.3
B7	6'-8'	Trichloroethene	1.13	0.3
B12	3'-5'	Trichloroethene	0.47	0.3
		Tetrachloroethene	1.32	0.3
B13	8'-10'	cis-1,2-DCE	10.1	1.1
		Trichloroethene	47.3	0.3
		Tetrachloroethene	4.45	0.3

6.0 Tier 1 Values for Ingestion and Inhalation Pathways

Constituent	Residential (mg/kg)		Industrial/Commercial (mg/kg)	
	Ingestion	Inhalation	Ingestion	Inhalation
Tetrachloroethene	12	11	110	20
Trichloroethene	58	5	520	8.9
cis-1,2-dichloroethene	780	1200	20000	1200
Vinyl Chloride	0.3	0.03	3	0.06

7.0 Cultural Setting

The facility is surrounded on the south and west by other industrial sites. Retail establishments front Lake Street to the west. Residential areas lie across Eighth Avenue to the east, and across Lake Street to the north. The facility is not operational at this time. The facility will be required to maintain engineered barrier and impose institutional controls for the protection against the inhalation and ingestion exposure routes.

8.0 Recommended Action or Resolution

The Permit Section recommends that the migration to groundwater route be considered eliminated due to the following reasons:

- The geology consists of impermeable silty or clayey till at least 50 ft thick. This indicates that the potential for downward migration of contamination is very low.
- The soil borings completed at the site indicate that silty clay is present down to 20 feet and no groundwater was encountered.
- The borings where contamination was detected at high concentrations at 8'-10' depth intervals are clean at 11'-13' depth interval.
- The contaminated area is present underneath the concrete floor of a building (an engineered barrier). Therefore, the possibility of the precipitation percolating into the ground do not exist. A deed restriction requiring continued maintenance of this barrier will be imposed.
- The City of Maywood receives its drinking water from Lake Michigan.

Chem-Plate Industries (CORE Submittal)

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List of Attachments

1. Site Location Map
2. Site Layout Map
3. Soil Boring Locations and Results
4. Geologic Cross-Sections
5. Exceedances Above Tier 1 Class I Values
6. Exceedances Above Tier 1 Class II Values

CORE RECOMMENDATION

☐ Concur with action or resolution proposed by the project manager

☒ Concur with action or resolution proposed by the project manager with the following conditions:

*Facility needs to address off-site contamination
@ B-13
accepted by CORE 9/25/97
JKH*

☐ Reject action or resolution proposed by the project manager

☐ Request the following information before issuing a final CORE recommendation:

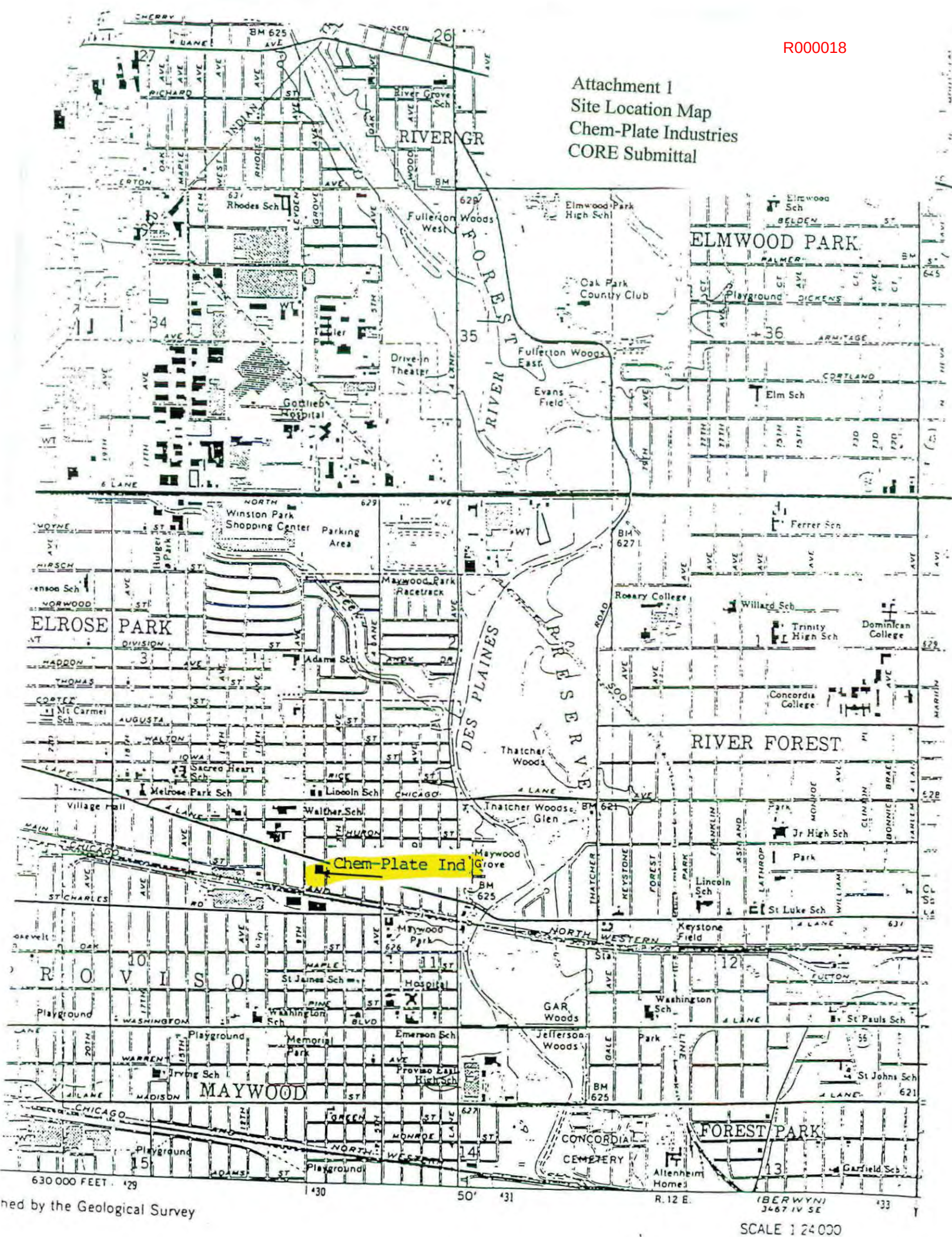
Section Manager Elvin C Bell Date 10/3/97

Unit Manager James K. Moore Date 9/10/97

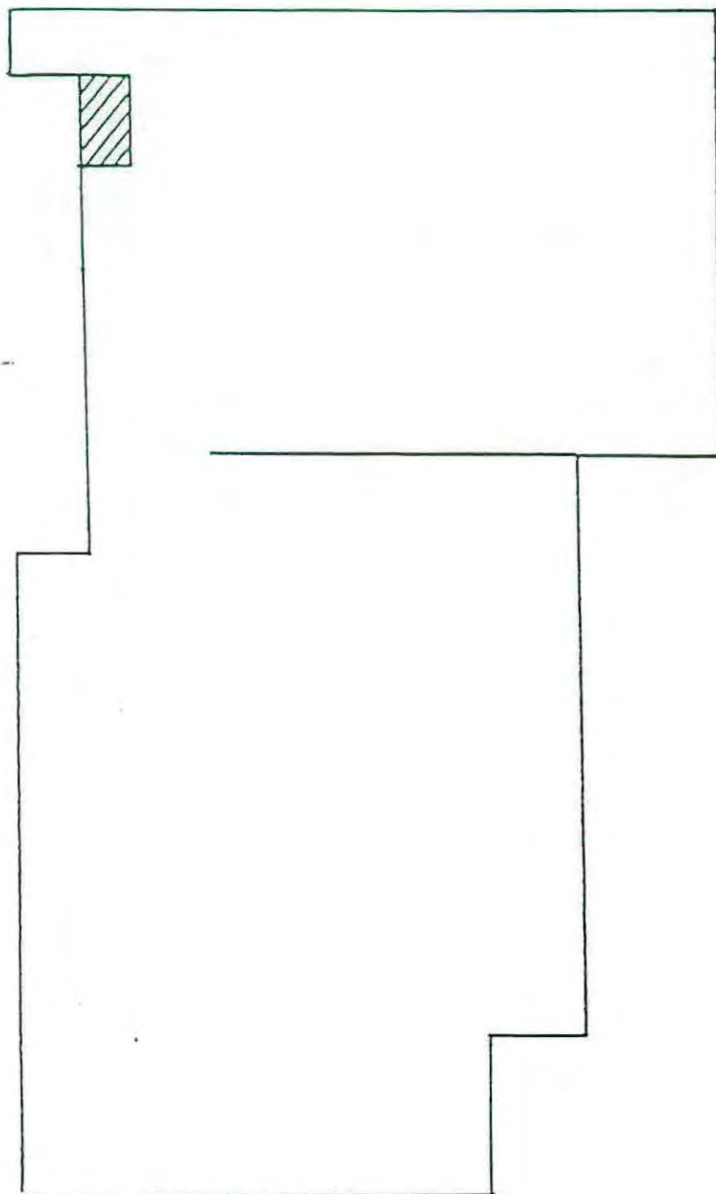
Project Manager M. Munir Ahmad Date 09-18-97

Notes:

Attachment 1
Site Location Map
Chem-Plate Industries
CORE Submittal



Attachment 2
Site Layout Map
Chem-Plate Industries
CORE Submittal



 Area to be
Closed

Scale 1/32" $\approx$ 1'

Plant Diagram

Chem-Plate Industries, Inc.
30 N. Eighth Avenue
Maywood, Il 60153

Attachment 3 Soil Boring Locations and Results Chem-Plate Industries CORE Submittal

RD00020

J/R Auto Clinic

B-2

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

B-11

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

B-4

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

B-3

B-5

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

B-12

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

B-43

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

C-13

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

E-19

C-24

B-8

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

C-22

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

C-21

C-15

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

C-19

C-16

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

C-17

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

C-18

BA	VC	TCR	PCE	1-3	3-5	5-8	8-10	10-15	15-25
VC	-	-	-	-	-	-	-	-	-
TCR	-	-	-	-	-	-	-	-	-
PCE	-	-	-	-	-	-	-	-	-

B-10

Depth Interval in feet
Concentration in ug/kg

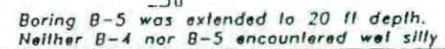
--No Analyte
SOL-Below Detection Limit
SPQL-Below Practical Quantitation Limit
VC-Vinyl Chloride
TCR-Trichloroethene
PCE-Tetrachloroethene

Soil Screening Level
10 ug/kg
30 ug/kg
40 ug/kg

Pathway Specific
Values (ug/kg)
Ingestion
10000
10000
10000

20 ft

Soil Boring Locations and Results
Chem-Plate Industries



J/R Auto clinic

Constituent	Ingestion (mg/Kg)	Inhalation (mg/Kg)	Migration to Groundwater Route (mg/Kg)	
			Class I	Class II
Vinyl Chloride	3	0.06	0.01	R000022
cis-1,2-DCE	20,000	1200	0.4	1.1
Trichloroethene	520	8.9	0.06	0.3
Tetrachloroethene	110	20	0.06	0.3

B-2

B2	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B11	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-11

B4	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-4

B5	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-5

B1	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-3

B12	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-12

B6	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-6

B13	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-13

C11	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-7

B7	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

Alley

B8	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-8

C14	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-24

C15	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-16

C16	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-9

C20	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-20

C17	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-17

C21	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-21

C19	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-19

C18	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-18

B10	1-3	3-5	5-8	8-10	11-13	13-15
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-10

Depth Interval in feet
Concentration in ug/Kg

--No Analysis
BDL=Below Detection Limit
BPQL=Below Practical Quantitation Limit
VC=Vinyl Chloride
cis-1,2-DCE
TCE=Trichloroethene
PCE=Perchloroethylene

Pathway Specific
Values (ug/Kg)
Ingestion
780000 1500000
12000 11000

20 ft

Attachment 5
Concentrations Above Tier 1 Class I Values
Chem-Plate Industries
CORE Submittal

J/R Auto Clinic

Contaminant	Ingestion (mg/kg)	Inhalation (mg/kg)	Migration to Groundwater (mg/kg)	
			Class I	Class II *
Vinyl Chloride	3	0.06	0.01	
cis-1,2-DCE	20,000	1200	0.1	1.1
Tetrachloroethene	320	8.9	0.06	0.3
Tetrachloroethane	110	20	0.06	0.3

R000023

B-2

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

B-11

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

B-4

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

B-5

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

B-3

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

B-12

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-6

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-7

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-25

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-8

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-10

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-26

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

B-6

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-11

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-23

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-22

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-13

B-7

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-14

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-16

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-15

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-20

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-21

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-17

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-19

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-18

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

C-18

BS	1-3	3-5	5-8	8-10	10-11	11-15
VC	-	BDL	-	-	-	-
cis-1,2-DCE	-	BDL	-	-	-	-
TCE	-	BDL	-	-	-	-
PCE	-	BDL	-	-	-	-

B-10

Depth Interval in feet
Concentration in ug/kg

--No Analysis
BDL=Below Detection Limit
BPQL=Below Practical Quantitation Limit

Contaminant	Soil Screening Level	Chem-Plate Industries
Vinyl Chloride	20 ug/kg	20 ug/kg
cis-1,2-DCE	20 ug/kg	20 ug/kg
TCE	20 ug/kg	20 ug/kg
PCE	20 ug/kg	20 ug/kg

Pathway Specific Values (ug/kg)

Contaminant	Soil Screening Level	Chem-Plate Industries
Vinyl Chloride	20 ug/kg	20 ug/kg
cis-1,2-DCE	20 ug/kg	20 ug/kg
TCE	20 ug/kg	20 ug/kg
PCE	20 ug/kg	20 ug/kg

20 ft

Attachment 6
Concentrations Above Tier 1 Class II Values
Chem-Plate Industries
CORE Submittal

REVIEW NOTES

INTRODUCTION

Site Name: Chem-Plate Industries, Inc.
Maywood, Cook County
State ID #0311835009
Fed. ID #ILD000665372
Log No. C-658-M-5

<u>Contact:</u>	Adam Straus	Peter Jay Huck
	Chem-Plate	GeoConsult Inc.
	708/640-1600	630/717-0633

Project: RCRA Closure of one (1) container storage area (SO1).

BACKGROUND

Description of the Facility

Chem-Plate Industries is an electroplater which utilize nickel, copper, zinc, cadmium, and chrome in their cyanide bearing processes. The facility is located in Section 2, Township 39 North, Range 12 East of the third Principal Meridian in Cook County, Illinois. A topographic map showing the location of the facility is included as **Figure 1**. Perchloroethylene is used at the facility to degrease the items to be plated.

Description of the Hazardous Waste Management Unit

Chem-Plate is undergoing RCRA Closure of one (1) indoor container storage area (SO1). The subject storage area is located in the northwest corner of the facility. The size of the storage area is about 10 ft by 15 ft and it has a concrete floor. The location of the container storage area is shown in **Figure 2**. A RCRA inspection was conducted on March 26, 1992 of the facility. During this inspection, this unit was cited for storage of seven (7) drums of perchloroethylene waste for longer than 90 days.

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August 7, 1992 Submittal (C-658)

Mr. Jeffrey Zak of Scientific Control Laboratories, Inc., submitted a closure plan for the subject container storage area on behalf of Chem-Plate under a August 7, 1992 cover letter. This closure plan was received by the Agency on August 14, 1994.

Agency's Response

The Agency approved the closure plan on November 2, 1994. It was identified in Condition 6 of the approval letter, that the facility perform the following:

- steam cleaning/triple rinsing of the concrete floor.
- structural integrity inspection of the concrete floor.
- submit a soil sampling plan if cracks/defects are observed on the concrete floor.

February 19, 1993 Submittal (C-658-M-1)

Mr. Peter Jay Huck of Terra Nova Research, Inc., submitted a closure plan modification request on February 19, 1993. This submittal was received by the Agency on March 1, 1993. This submittal described the findings of a structural integrity inspection performed for the concrete floor. There were one "Major Crack" and three "Minor Cracks" identified on the floor. The location of the cracks are shown on **Figure 3**. The facility also proposed to drill two (2) cores along the Major Crack.

Agency's Response

The Agency approved this closure plan modification request on May 27, 1993. The soil cleanup objectives were outlined in Condition 5 of the approval letter.

November 12, 1993 Submittal (C-658-M-2)

Mr. Peter Jay Huck of Terra Nova Research, Inc., submitted a closure plan modification request on November 12, 1993. This submittal was received by the Agency on November 17, 1993. This submittal contained the results of the soil sampling/analysis activities performed at the subject unit. A total of five (5) cores were made through the concrete floor, as indicated in **Figure 4**. The compounds detected above the cleanup objectives are tetrachloroethene, trichloroethene, cis 1,2-dichloroethene and vinyl chloride. The analytical results are summarized in **Table 1**. The analytical results are also summarized on the next page.

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Sample Depth=6" (Conc. in ug/Kg)

Parameter	CUO	Concentration Range
cis 1,2-dichloroethene	70	1.9-9.7
Trichloroethene	5	2.3-10.1
Tetrachloroethene	5	4.2-180

Sample Depth=24" (Conc. in ug/Kg)

Parameter	CUO	Backgrnd	Concentration Range
cis 1,2-dichloroethene	70	534	2.9-351
Trichloroethene	5	21	<5-8
Tetrachloroethene	5	130	<5 -53.9
Vinyl Chloride	2	3.6	9.2-531

Sample Depth=48" (Conc. in ug/Kg)

Parameter	CUO	Concentration Range
cis 1,2-dichloroethene	70	<MDL-2460
Trichloroethene	5	<MDL-5310
Tetrachloroethene	5	<MDL-77.1
Vinyl Chloride	2	<MDL-603

It was stated in the submittal that the facility does not believe that the contamination detected in the soil is related to the RCRA unit. The greatest contamination was found beneath the tightest cracks, at the greatest distance from the storage location, and at the greatest depths. Also, high levels of contamination was detected from a background location outside the building (location is shown in **Figure 4**).

This submittal also proposed to initiate a wider subsurface exploration program.

Agency's Response

The Agency approved this closure plan modification request on December 28, 1993.

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August 15, 1994 Submittal (C-658-M-3)

Mr. Peter Jay Huck of Terra Nova Research submitted a closure plan modification request under a August 15, 1994 cover letter which was received by the Agency on November 29, 1994. This report contained the results of the soil sampling/analysis activities performed at the site as part of the RCRA closure of the container storage area. The facility installed 13 borings outside the structure and 26 borings inside the structure. The boring locations and the analytical results are depicted on **Figure 5**.

Agency's Response

The Agency gave the following response to the above submittal in a letter which was sent out February 27, 1995.

- Chem-Plate has not provided any information which demonstrates that the requirements of 35 IAC 725.211 and 725.214 will be met by allowing the residual soil contamination in the vicinity of this unit to remain in place. The matter of special concern is the presence of contamination in several deeper samples. The contamination levels which were detected at high concentrations are summarized in the table below (values are in mg/Kg):

Boring		B-13	C-6	C-8	C-9	C-10	C-12	C-23
Depth Interval	CUO	8'-10'	8'-9'	8'	8'-10'	8'-10'	7'-8'	3'-5'
Vinyl Chloride	0.002	BDL	BDL	BDL	BDL	0.059	BDL	BDL
cis-1,2-DCE	0.07	10.1	10.4	16.6	9.26	15.0	0.59	0.023
TCE	0.005	47.3	1100	407	4.65	4.93	3.06	0.039
PCE	0.005	4.45	416	149	BDL	BPQL	7.25	0.664

- Based upon a review of the subject submittal, it appears as though soil remediation is necessary before a conclusion can be reached that closure of the subject area has met the closure performance standards of 35 IAC 725.211 and 725.214. A plan describing the remedial actions which will be taken in response to the detected soil contamination should be submitted to the Agency by May 1, 1995. This plan should describe in detail each step which will be taken in remediating the detected contamination. Guidance regarding the information which should be provided in this plan can be found in Section 2.6 of the attached document entitled Guidance for Preparing Closure Plans for Interim Status RCRA Hazardous Waste Facilities.

The Agency understands the consequences and implications of the comments made in this letter. In addition, it also understands that there are many complicating factors associated with this

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project. Please understand that the Agency is willing to work with the owners of this facility to complete closure of the subject hazardous waste container storage area but it must ensure that human health and the environment is adequately protected upon completion of the closure activities. As such, a meeting should be scheduled with the Agency to further discuss what actions should be taken to complete closure of this unit prior to expending much additional work on this project. The purpose of the meeting will be to further discuss what must be done to complete closure of this unit.

June 14, 1995 Meeting

A meeting was held between the representatives of the Chem- Plate and IEPA on June 14, 1995 at the Attorney General Office in Chicago. The attendees are listed below:

IEPA

Jim Moore
Munib Ahmad
Peter Orlinsky
Tina Kovasznay

Attorney General

Mike Mack

Chem-Plate

Chris Nowotarski
Peter Jay Huck

The subject of the meeting was the RCRA closure of the container storage area at the Chem-Plate Industries in Maywood, Illinois. Based upon the discussion made in the meeting the Permit Section went in front of CORE (Cleanup Objectives, Review and Evaluation Group) with some recommendations which are mentioned below.

June 22, 1995 CORE Meeting

- The facility proposed to remediate an area identified in **Figure 5** using soil vacuum extraction (SVE) technology. The permit section agrees with this recommendation. The permit section recommends that soil cleanup objectives for this facility should be established as follows:

Cleanup Objective

Trichloroethylene & Tetrachloroethene	100 ug/Kg
cis-1,2-dichloroethen	500 ug/Kg

The basis for the above recommendation is that a substantial amount of clay which has a very low permeability is present between the contaminated soil and the uppermost aquifer.

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The CORE group approved the above recommendation.

Agency's August 23, 1995 Letter

As a follow-up to the June 14, 1995 meeting and the decision made in the June 22, 1995 CORE meeting, the following comments were conveyed to the Chem-Plate Industries by the Agency in a 8/23/95 letter:

1. To achieve clean-closure of the subject area, Chem-Plate should perform soil remediation in the highlighted area as shown in the attached figure.
2. In order to meet the clean closure requirements of 35 IAC 725.211 and 725.214, contaminated soils should be remediated such that the following cleanup objectives are met:

<u>Parameter</u>	<u>Cleanup Objective (ug/Kg)</u>
cis-1,2-Dichloroethylene	500
Tetrachloroethylene	100
Trichloroethylene	100
Vinyl Chloride	10

3. A plan describing the remedial actions which will be taken to remediate the contaminated soil should be submitted to the Agency by September 1, 1995. This plan should describe in detail each step which will be taken in remediating the soil contamination. Guidance regarding the information which should be provided in this plan can be found in Section 2.6 of the attached document entitled Guidance for Preparing Closure Plans for Interim Status RCRA Hazardous Waste Facilities. Also included for your guidance a document entitled Information Which Should be Provided to IEPA Regarding Pilot Scale Study for Soil Vapor Extraction System.

November 28, 1995 Submittal (C-658-M-4)

Mr. Peter Jay Huck of Terra Nova Research submitted a closure plan modification request on November 28, 1995, and was received at the Agency on December 8, 1997. This submittal contained a discussion of some potential options and associated costs for disposal of drill cuttings generated at a result of closure activities to be performed at the site. This submittal was approved by the Illinois EPA in a February 27, 1997 letter subject to the following conditions and modifications:

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1. The drill cuttings which are generated as a result of closure activities to be performed at the facility are considered hazardous waste and must be managed in accordance with 35 IAC 721.722 and 809. Thus, if they are disposed off-site without any treatment, then they must be disposed at a hazardous waste landfill. However, if drill cuttings are treated on-site such that they meet the soil clean-up objectives given in the Agency's August 23, 1995 letter (Log No. C-658-M-3), then they can be managed as a fill material on-site or disposed off-site as a non-hazardous special waste.
2. If on-site treatment option is chosen to treat drill cuttings in containers using Soil Vacuum Extraction (SVE) technology, then Chem-Plate should contact Bureau of Air, Permit Section (Tel. No. 217/782-2113) and Bureau of Water, Permit Section (Tel. No. 217/782-0610) to determine if any air or water permits are required for running the remediation system. In addition, the RCRA closure plan must be modified to describe in detail the selected treatment system. Information which must be provided to the Agency in such a modification request can be found in Section 2.6.2 of the attached draft RCRA closure plan guidance document.
3. Except as modified above, closure of the subject hazardous waste container storage area must be carried out in accordance with the Agency's August 23, 1995 (Log No. C-658-M-3) closure plan approval letter.

REVIEW OF THE PRESENT SUBMITTAL

Mr. Peter Jay Huck of Terra Nova Research, Inc., submitted a submittal dated July 25, 1997, on behalf of Chem-Plate Industries. This submittal was received at the Agency on August 4, 1997. A summary of the present submittal is provided below:

- The pathway to groundwater is not present at the site. This is based upon the observations that:
 - (1) The gray silty clay encountered at a depth of about 10 ft has measured permeabilities in the range 10^{-9} cm/s.
 - (2) Although the contaminants have probably been on site for years, they have not penetrated significantly into the gray silty clay. The maximum depth to clean soil was 15 feet.
 - (3) There is no permeable layers in the near-surface soils which are consistent across the site. The few wet sand lenses that were encountered ran dry after making a few gallons of water. Sand lenses, wet or dry, occurred at different elevations in different borings, and many of the borings did not encounter sand lenses at all.

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These points all argue that there is not a near-surface aquifer on the site.

- No borings on the outside of the building encountered compound concentrations that exceeded the TACO Tier 1 soil cleanup objectives.
- Two borings inside the building encountered trichloroethene concentrations that were more than 100 times the TACO Tier 1 soil cleanup objectives for industrial/commercial workers. These were both below a concrete floor and further covered by eight feet of soil.
- It is requested that the Agency consider the existing concrete floors plus 8 ft of overlying clay as constituting engineered barriers and issuing a no further action letter.

Reviewer's Notes

Geology/Hydrogeology of the Site

Based on the information obtained from the Geologic Susceptibility Map contained in the 1984 ISGS publication "Potential for Contamination of Shallow Aquifers in Illinois", the surficial geology in this location is described as *"Uniform, relatively impermeable silty or clayey till at least 50 ft thick; no evidence of interbedded sand and gravel"*.

The geologic cross-sections included as **Figure 6** indicates that the shallow geology at the site is made up of fill material which is about two to six feet in thickness. The fill material is comprised of mixed brown, mottled gray/brown and black silty clay. Beneath the fill lies a layer of brown/gray mottled silty clay, overlying a layer of brown silty clay. This extends from the bottom of the fill to a depth of ten to twelve feet. The underlying material is the gray silty clay.

Frequent stringers of sand, silty sand and sandy gravel were found in the indigenous brown and brown/gray mottled silty clay. Groundwater table was not encountered up to 20 ft depth. The facility performed permeability test of two samples of gray clay collected from two soil borings. The permeability was measured as 9.84×10^{-9} cm/s and 1.23×10^{-8} cm/s. The City of Maywood receives drinking water from the Lake Michigan.

Extent of Contamination

The extent of contamination has been defined at the site and is shown on **Figure 5**. The vertical extent of contamination extends to a depth of 8 to 10 feet. The contaminants of concern at the site are trichloroethene, tetrachloroethene, cis-1,2-dichloroethene, and vinyl chloride.

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Tier 1 EvaluationIngestion Pathway

The following exceedances were observed above the Tier 1 industrial/commercial values. The exceedances are also identified on **Figure 7**.

Boring	Depth Interval	Constituent	Concentration (mg/kg)	Tier 1 Value (mg/Kg)
C6	8'-9'	Trichloroethene	1100	520
		Tetrachloroethene	410	110
C8	8'	Tetrachloroethene	150	110

Based upon a review of the above table, it appears as though that ingestion pathway is not a concern due to the following reasons:

- The contamination levels above the Tier 1 values were detected in only two borings.
- The contamination is present at approximately 8 to 10 feet below ground surface underneath a concrete floor of a building.

The facility needs to impose institutional controls to maintain engineered barrier over the contaminated area and to keep the property for industrial/commercial use only.

Inhalation Pathway

The exceedances above the Tier 1 (industrial/commercial) values are identified below and are also depicted on **Figure 8**:

Boring	Depth Interval	Constituent	Concentration (mg/kg)	Tier 1 Value (mg/Kg)
C6	8'-9'	Trichloroethene	1100	8.9
		Tetrachloroethene	410	20
C8	8'	Trichloroethene	400	8.9
		Tetrachloroethene	150	20
B13	8'-10'	Trichloroethene	47.3	8.9

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Based upon a review of the above table, it appears as though that the inhalation pathway is not a concern due to the following reasons:

- The contamination levels above the Tier 1 values were detected in only three borings.
- The contamination is present at approximately 8 to 10 feet below ground surface underneath a concrete floor of a building.

The facility needs to impose institutional controls to maintain engineered barrier over the contaminated area and to keep the property for industrial/commercial use only.

Migration to Groundwater Route

The exceedances above the Tier 1 Class I cleanup objectives are identified below and are also depicted on **Figure 9**.

Boring	Depth Interval	Constituent	Concentration (mg/kg)	Tier 1 Class I Value (mg/Kg)
C6	3'-5'	Vinyl Chloride	0.025	0.01
	8'-9'	cis-1,2-DCE	10.4	0.4
		Trichloroethene	1100	0.06
		Tetrachloroethene	410	0.06
C8	8'	cis-1,2-DCE	16.6	0.4
		Trichloroethene	400	0.06
		Tetrachloroethene	150	0.06
C9	3'-5'	Trichloroethene	0.154	0.06
	8'-10'	cis-1,2-DCE	9.26	0.4
		Trichloroethene	4.65	0.06
C10	8'-10'	Vinyl Chloride	0.059	0.01
		cis-1,2-DCE	15	0.4
		Trichloroethene	4.93	0.06
C11	3'-5'	Tetrachloroethene	0.261	0.06
C12	7'-8'	cis-1,2-DCE	0.592	0.4
		Trichloroethene	3.06	0.06
		Tetrachloroethene	7.25	0.06

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C13	8'-10'	Trichloroethene	0.549	0.06
		Tetrachloroethene	0.965	0.06
C15	1'-3'	Vinyl Chloride	0.09	0.01
C22	3'-5'	Vinyl Chloride	0.045	0.01
	8'-10'	Vinyl Chloride cis-1,2-DCE	0.069 1.12	0.01 0.4
	11'-13'	Vinyl Chloride	0.017	0.01
C23	3'-5'	Tetrachloroethene	0.664	0.06
	8'-10'	Trichloroethene Tetrachloroethene	0.176 0.649	0.06 0.06
	13'-15'	Trichloroethene Tetrachloroethene	0.351 2.78	0.06 0.06
B3	3'-5'	Trichloroethene	0.13	0.06
B6	3'-5'	cis-1,2-DCE	0.525	0.4
B7	6'-8'	Trichloroethene	1.13	0.06
B12	3'-5'	Trichloroethene	0.47	0.06
		Tetrachloroethene	1.32	0.06
B13	3'-5'	cis-1,2-DCE	0.561	0.4
	8'-10'	cis-1,2-DCE	10.1	0.4
		Trichloroethene	47.3	0.06
		Tetrachloroethene	4.45	0.06

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The exceedances above the Tier 1 Class II cleanup objectives are identified below and are also depicted on **Figure 10**.

Boring	Depth Interval	Constituent	Concentration (mg/kg)	Tier 1 Class II Value (mg/Kg)
C6	8'-9'	cis-1,2-DCE	10.4	1.1
		Trichloroethene	1100	0.3
		Tetrachloroethene	410	0.3
C8	8'	cis-1,2-DCE	16.6	1.1
		Trichloroethene	400	0.3
		Tetrachloroethene	150	0.3
C9	8'-10'	cis-1,2-DCE	9.26	1.1
		Trichloroethene	4.65	0.3
C10	8'-10'	cis-1,2-DCE	15	1.1
		Trichloroethene	4.93	0.3
C12	7'-8'	Trichloroethene	3.06	0.3
		Tetrachloroethene	7.25	0.3
C13	8'-10'	Trichloroethene	0.549	0.3
		Tetrachloroethene	0.965	0.3
C15	1'-3'	Vinyl Chloride	0.09	0.07
C23	3'-5'	Tetrachloroethene	0.664	0.3
	8'-10'	Tetrachloroethene	0.649	0.3
	13'-15'	Tetrachloroethene	2.78	0.3
B7	6'-8'	Trichloroethene	1.13	0.3
B12	3'-5'	Trichloroethene	0.47	0.3
		Tetrachloroethene	1.32	0.3
B13	8'-10'	cis-1,2-DCE	10.1	1.1
		Trichloroethene	47.3	0.3
		Tetrachloroethene	4.45	0.3

Chem-Plate (C-658-M-5)

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In reviewer's opinion, the migration to groundwater route is not a concern and can be eliminated due to the following reasons:

- The geology consists of impermeable silty or clayey till at least 50 ft thick. This indicates that the potential for downward migration of contamination is very low.
- The soil borings completed at the site indicate that silty clay is present down to 20 feet and no groundwater was encountered.
- The borings where contamination was detected at high concentrations at 8'-10' depth intervals are clean at 11'-13' depth interval.
- The contaminated area is present underneath the concrete floor of a building. Therefore, the possibility of the precipitation percolating into the ground do not exist.
- The City of Maywood receives its drinking water from Lake Michigan.

September 25, 1995 CORE Meeting

The Permit Section recommended to CORE on September 25, 1997 that the migration to groundwater route at the site be considered eliminated due to the following reasons:

- The geology consists of impermeable silty or clayey till at least 50 ft thick. This indicates that the potential for downward migration of contamination is very low.
- The soil borings completed at the site indicate that silty clay is present down to 20 feet and no groundwater was encountered.
- The borings where contamination was detected at high concentrations at 8'-10' depth intervals are clean at 11'-13' depth interval.
- The contaminated area is present underneath the concrete floor of a building (an engineered barrier). Therefore, the possibility of the precipitation percolating into the ground do not exist. A deed restriction requiring continued maintenance of this barrier will be imposed.
- The City of Maywood receives its drinking water from Lake Michigan.

The CORE accepted the above recommendation subject to the following condition:

- The facility must address the soil contamination detected in the vicinity of Boring B13 located in an alley to the west of the facility.

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FINAL ACTION TAKEN

The present submittal is approved subject to the following conditions and modifications:

1. Low levels of volatile organic compounds (VOCs) remain in the soil beneath the concrete floor in the vicinity of the container storage area inside the building. These levels will not pose a threat to human health or the environment provided:
 - a. A relatively impermeable barrier such as existing concrete floor is in place over these soils;
 - b. The barrier is properly maintained in the future;
 - c. Restrictions are in place to limit direct human exposure to the soils beneath the cover;
 - d. A site safety plan to address possible work exposure to the soil in this area is developed and implemented for any future excavation/construction activity in this area; and
 - e. Any soil removed from this area during future activities is managed as a special waste in accordance with 35 Ill. Adm. Code, Subtitle G: Waste Disposal.
2. As part of the closure activities, a survey plat must be developed which shows the location and dimensions of the contaminated area, relative to the legal boundaries of the site. The plat must be prepared and certified by a professional land surveyor and be developed with respect to permanently surveyed benchmark.
3. The survey plat identified in Condition 2 above must contain a note, prominently displayed, which states that:
 - a. A hazardous waste container storage area was once present at the facility. This container storage area was closed in accordance with an Illinois EPA approved closure plan. The Illinois EPA determined that the area in the vicinity of the container storage area was properly remediated and that no further action was necessary, so long as this note was placed in the deed to the property and the requirements set forth in this note are met.
 - b. Low levels of VOCs remain in the soils beneath the container storage area.
 - c. The low levels of contaminants in the soils beneath the container storage area pose no threat to human health and the environment provided:

Chem-Plate (C-658-M-5)

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- (1) A concrete floor is in place over the area where soil contamination is present;
 - (2) The cover is properly maintained;
 - (3) Access to the area is restricted so that humans will not come into direct contact with the soils;
 - (4) A site survey plan to address possible worker exposure to the soils in this area must be developed and implemented for any future excavation/construction activities in this area; and
 - (5) Any soil removed from this area during future activities must be managed as a special waste in accordance with 35 Ill. Adm. Code Subtitle G: Waste Disposal.
4. The survey plat identified in Conditions 2 and 3 above must be:
 - a. Attached to the deed for the subject property, or on some other instrument which is normally examined during title search, which will in perpetuity notify any potential purchaser of the property of the requirements set forth in the notation identified in Condition 3 above.
 - b. Submitted to the County Recorder, any local zoning authority and any other authority over local land use.
5. A copy of the survey plat required by Conditions 2 and 3 above as well as documentation indicating the requirements of Condition 4 has been met must be submitted to the Illinois EPA along with the closure certification/documentation report required by Condition 6 below.
6. Soil sample collected at a depth interval of 8'-10' from the boring B-13 (shown on Site Layout Plan of the subject submittal) which is located in an alley west of the on-site building detected trichloroethene at a concentration of 47 mg/kg. The facility must address this contamination by removing the contaminated soil or by imposing institutional controls. Chem-Plate must submit a plan to Illinois EPA by November 15, 1997 which identifies how the soil contamination detected in the vicinity of soil boring B-13 will be addressed. This plan should be developed in accordance with the procedures set forth in 35 Ill. Admin. Code 725, Subpart G and 35 Ill. Admin. Code 742. The attached RCRA closure plan guidance document should also be used in the development of this plan.
7. Closure activities should be completed by April 1, 1998. When closure is complete the owner or operator must submit to the Illinois EPA certification both by the owner or operator and by an independent registered professional engineer that the facility has been

Chem-Plate (C658-M-5)

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closed in accordance with the specifications in the approved closure plan. This certification should be received at the Illinois EPA within sixty (60) days after closure or by June 1, 1998. These dates may be revised if Chem-Plate finds that additional time is necessary to complete all required closure activities and Chem-Plate demonstrates to the Illinois EPA that it is attempting to complete closure in a timely manner.

The attached closure certification form must be used. Signatures must meet the requirement of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Illinois EPA approves the facility's closure certification.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E. Plans and specifications, designs, drawings, reports, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

As part of the closure certification, to document the closure activities at the subject facility, please submit a Closure Documentation Report which includes:

- a. the volume of waste, waste residue and contaminated soil removed, including wastes resulting from decontamination activities. Actual disposition of this waste must also be described;
- b. scaled drawings showing the horizontal and vertical boundaries from which any contaminated soil was removed;
- c. a description of the method of waste handling and transport;
- d. waste manifest numbers;
- e. copies of the waste manifests;
- f. a description of the sampling and analytical methods used including sample preservation methods and chain-of-custody information;

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- g. a chronological summary of closure activities and the cost involved;
- h. color photo documentation of the subject area/activities before, during and after closure;
- i. information documenting the results of all soil sampling/analysis efforts. The goal of presenting this information should be to describe, in a logical manner, the activities and results associated with the sampling/analysis effort. At a minimum, this information must include:
 - (1) identification of the reason for the sampling/analysis effort and the goals of the effort;
 - (2) a summary in tabular form of all analytical data, including all quality assurance/quality control data;
 - (3) a scaled drawing showing the horizontal and vertical locations where all soil samples were collected;
 - (4) a description of the soil sampling procedures, sample preservation procedures, chain of custody procedures and quality assurance/quality control procedures;
 - (5) identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical inferences;
 - (6) copies of the final laboratory report sheets;
 - (7) visual classification of each soil sample in accordance with ASTM D-2488;
 - (8) a discussion of the data, as it relates to the overall goal of the sampling/analysis effort;
- j. information required by Condition 5 above.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Illinois EPA by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control -- #33
Permit Section
1021 North Grand Avenue East
P.O. Box 19276

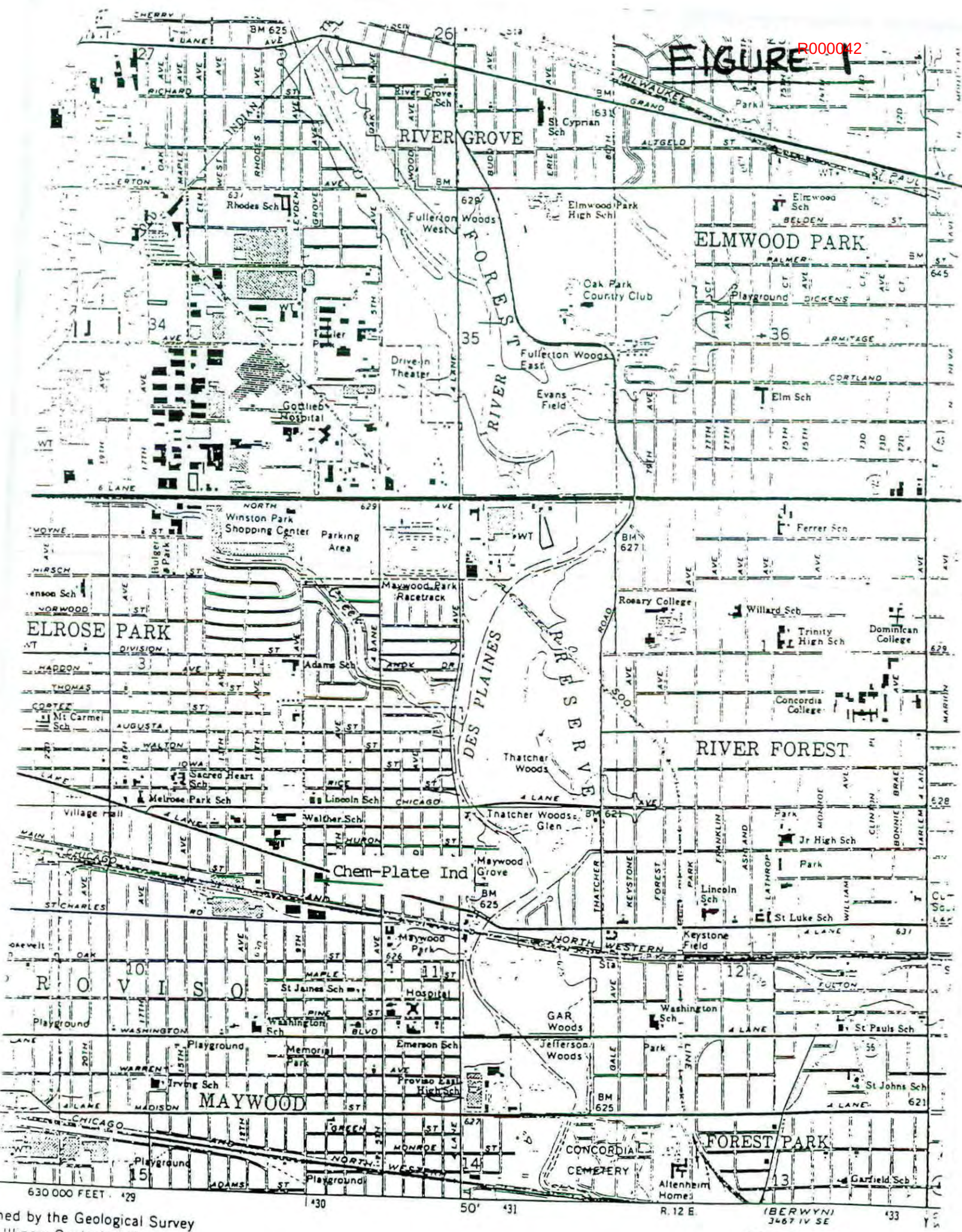
Chem-Plate (C658-M-5)
Page 18

Springfield, Illinois 62794-9276

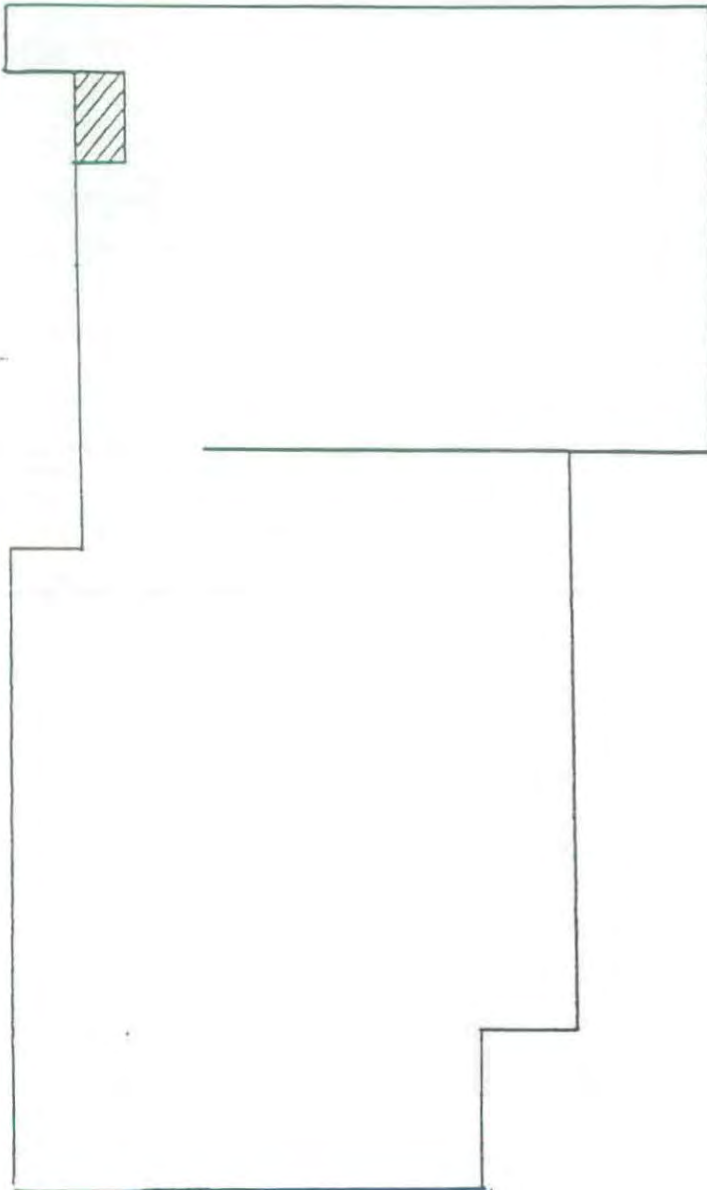
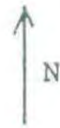
8. The approval of this closure plan does not resolve any of this facility's possible violations of 35 Ill. Adm. Code 725, Subpart H (Financial Requirements). Any such possible violation will not be resolved (and the facility will remain out of compliance) until: (1) adequate financial assurance is established; or (2) the Agency approves the certification of final closure for the facility.
9. The approval of this closure plan will not: (1) resolve any of this facility's possible violations of the Illinois Environmental Protection Act and/or (2) prevent the USEPA or Illinois EPA from pursuing enforcement proceedings and monetary penalties as a result of the afore-mentioned possible violations.
10. The attached form entitled RCRA Interim Status and Post-Closure Plans General Form (LPC-PA18) must be completed and accompany all information submitted to the Illinois EPA associated with the RCRA closure activities described in this letter. As noted on the form, two copies must accompany the original of all submittals, so that the information can be distributed to the appropriate Illinois EPA personnel, including regional offices.

FIGURE 1

R000042



R000043
FIGURE 2

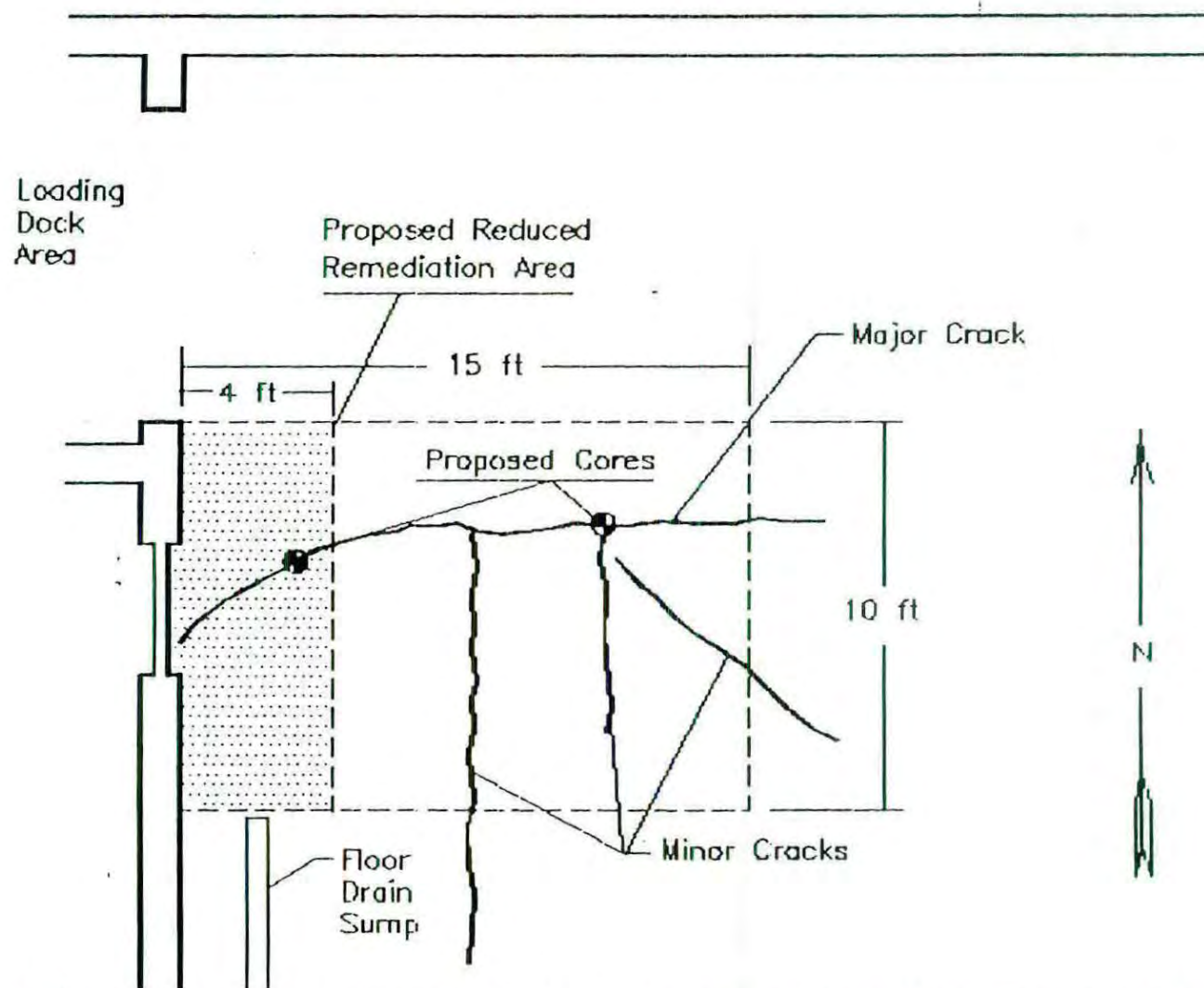


 Area to be
Closed

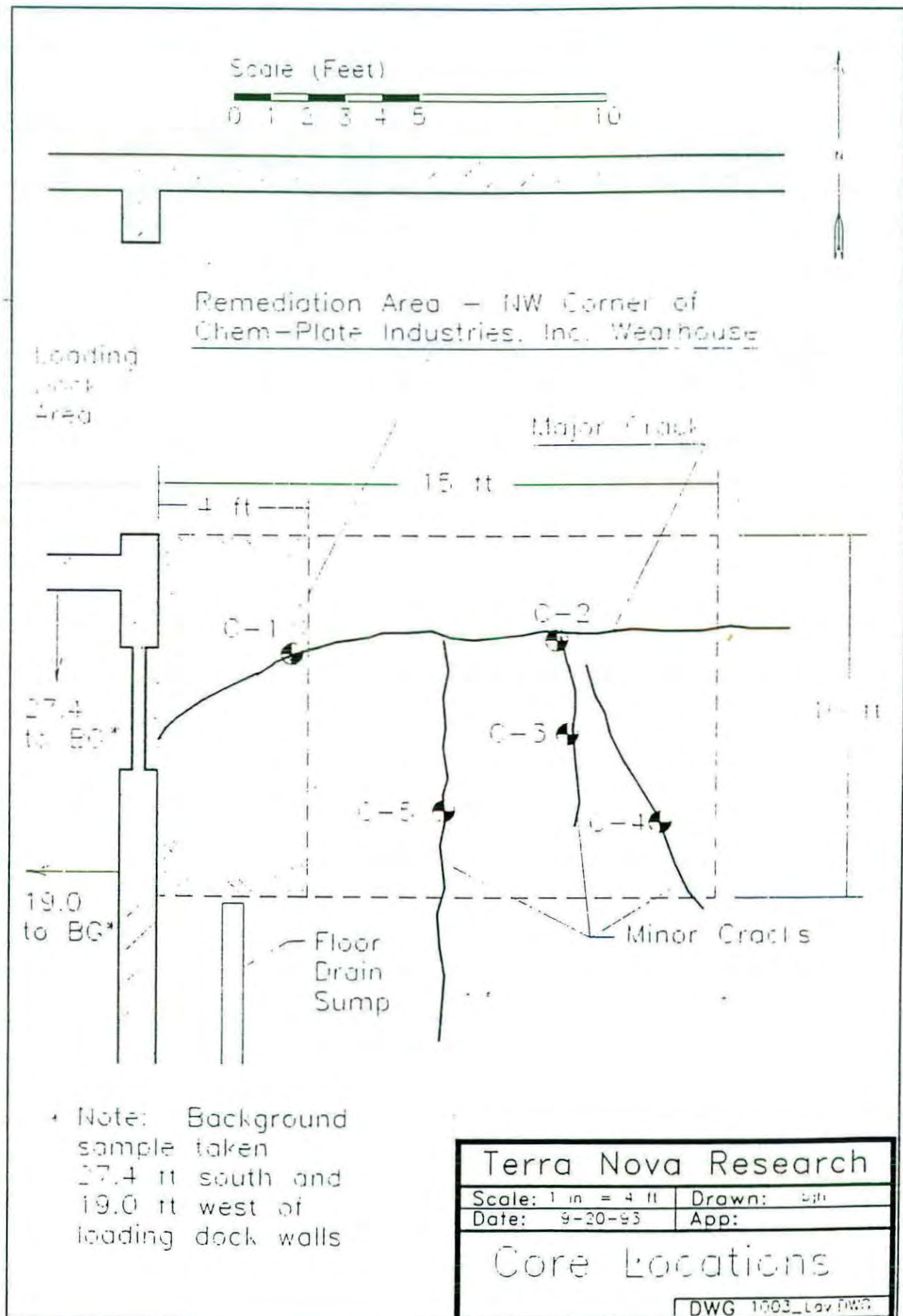
Scale 1/32" $\approx$ 1'

Plant Diagram

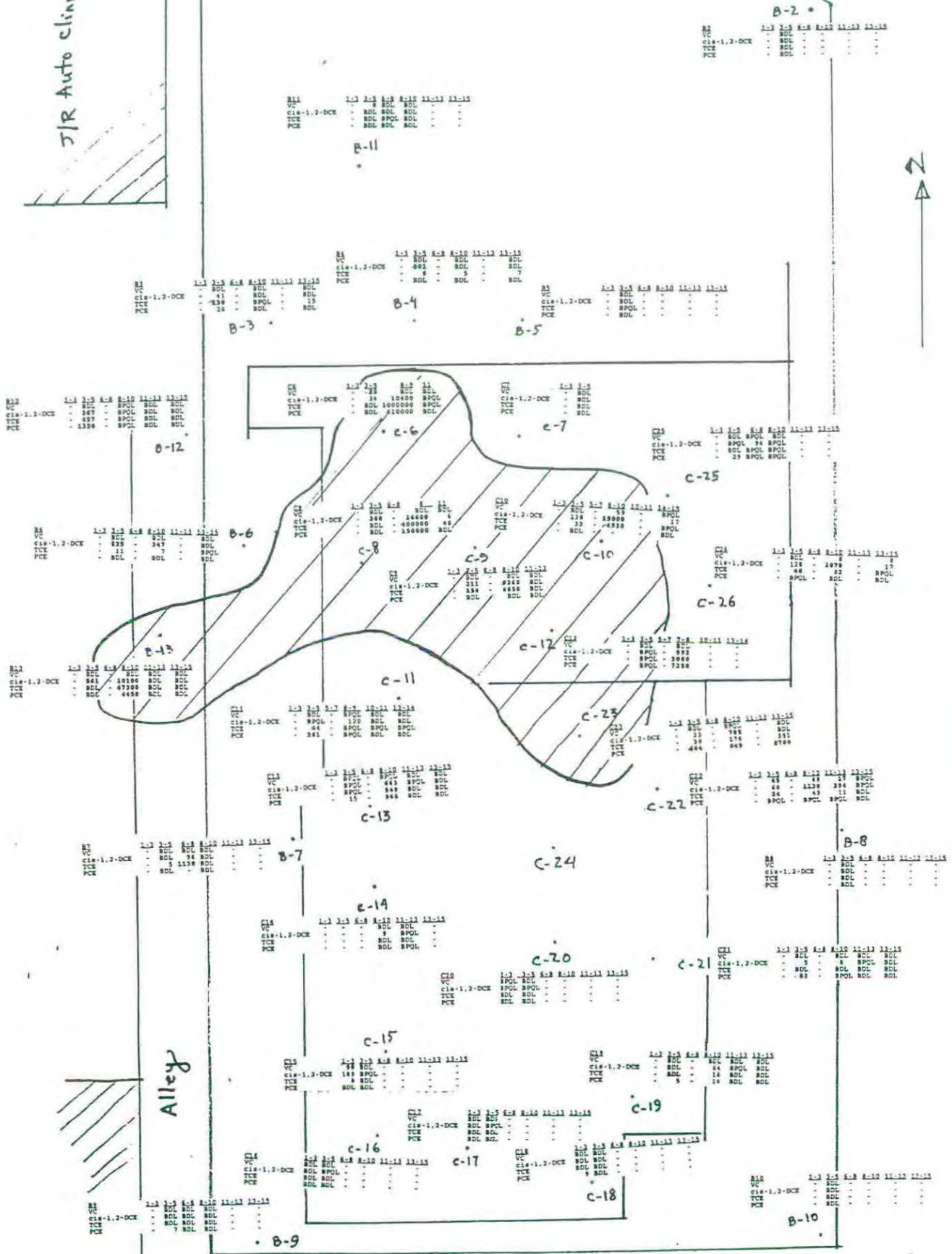
Chem-Plate Industries, Inc.
30 N. Eighth Avenue
Maywood, IL 60153



Remediation Area - NW Corner of Chem-Plate Industries, Inc. Wearhouse



J/R Auto clinic



Depth Interval in feet
Concentration in ug/kg

--No Analysis
NDL=Below Detection Limit
SPQL=Below Practical Quantitation Limit

VC=Vinyl Chloride
cis-1,2-DCE=cis-1,2-Dichloroethene
TCE=Trichloroethene
PCE=Tetrachloroethene

Pathway Specific Values (ug/kg)
Ingestion Inhalation
100 100000
10000 10000
10000 10000
10000 10000

20 ft

Soil Boring Locations and Results
Chem-Plate Industries

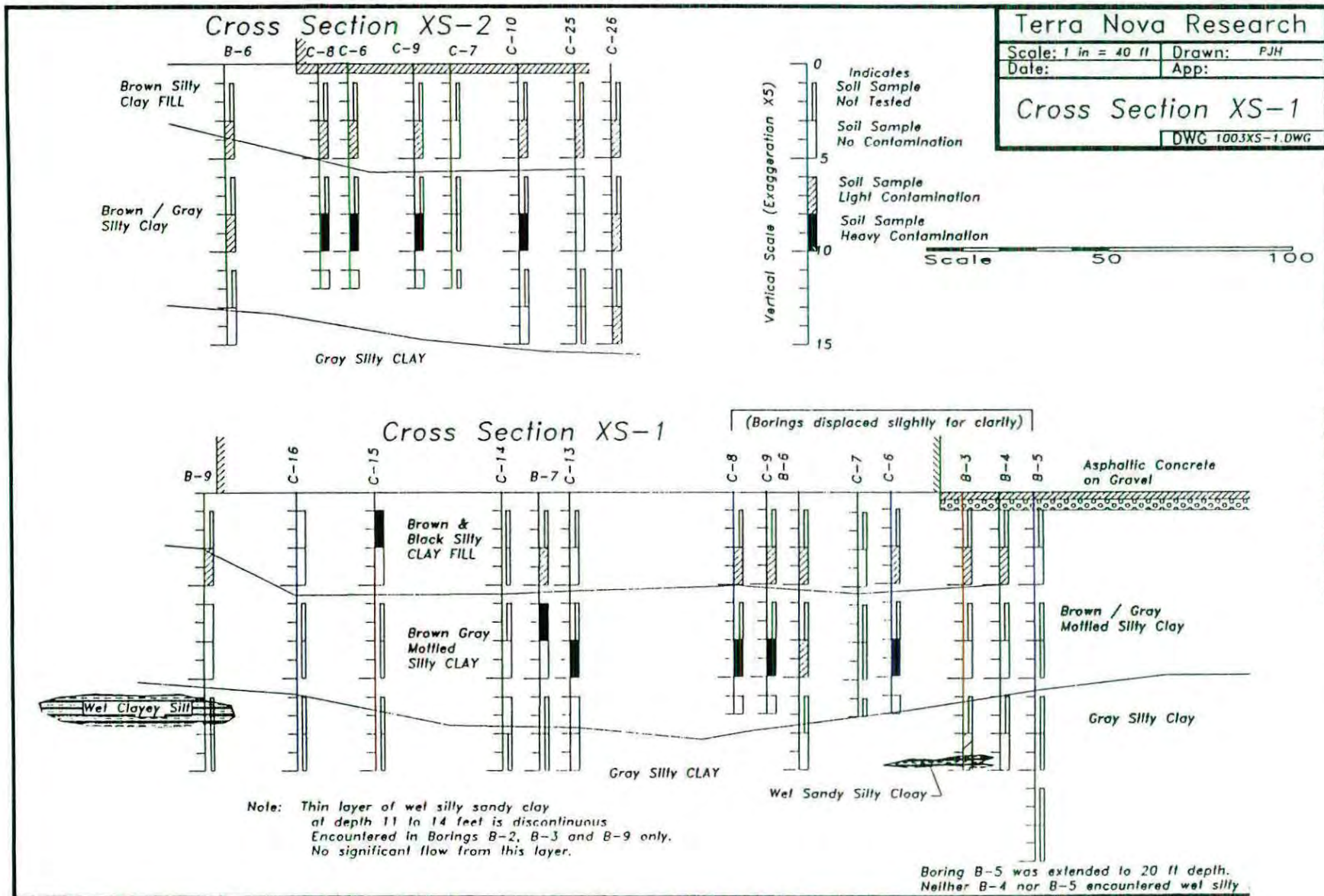


Figure 6
Attachment 3
Geologic Cross-Section
Chem-Plate Industries
CORE Submittal

5/R Auto clinic

Constituent	Ingestion (mg/kg)	Inhalation (mg/kg)	Migration to Groundwater (mg/kg)	
			Class I	Class II
Vinyl Chloride	3	0.06	0.01	0.01
cis-1,2-DCE	30,000	1200	0.4	0.4
Trichloroethene	520	8.9	0.06	0.3
Tetrachloroethene	110	20	0.06	0.3

R000048

B-2 •

	1-3	3-5	5-8	8-10	10-13	13-15
B2	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

	1-3	3-5	5-8	8-10	10-13	13-15
B11	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-11

	1-3	3-5	5-8	8-10	10-13	13-15
B4	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-4

	1-3	3-5	5-8	8-10	10-13	13-15
B5	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-5

	1-3	3-5	5-8	8-10	10-13	13-15
B3	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-3

	1-3	3-5	5-8	8-10	10-13	13-15
B12	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-12

	1-3	3-5	5-8	8-10	10-13	13-15
C6	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-6

	1-3	3-5	5-8	8-10	10-13	13-15
C7	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-7

	1-3	3-5	5-8	8-10	10-13	13-15
C21	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-25

	1-3	3-5	5-8	8-10	10-13	13-15
C8	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-8

	1-3	3-5	5-8	8-10	10-13	13-15
C10	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-10

	1-3	3-5	5-8	8-10	10-13	13-15
C12	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-26

	1-3	3-5	5-8	8-10	10-13	13-15
B13	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-13

	1-3	3-5	5-8	8-10	10-13	13-15
C11	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-11

	1-3	3-5	5-8	8-10	10-13	13-15
C23	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-23

	1-3	3-5	5-8	8-10	10-13	13-15
C22	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-22

	1-3	3-5	5-8	8-10	10-13	13-15
B7	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

	1-3	3-5	5-8	8-10	10-13	13-15
C13	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-13

	1-3	3-5	5-8	8-10	10-13	13-15
C14	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-14

	1-3	3-5	5-8	8-10	10-13	13-15
B8	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-8

	1-3	3-5	5-8	8-10	10-13	13-15
C15	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-15

	1-3	3-5	5-8	8-10	10-13	13-15
C20	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-20

	1-3	3-5	5-8	8-10	10-13	13-15
C21	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-21

	1-3	3-5	5-8	8-10	10-13	13-15
B9	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

	1-3	3-5	5-8	8-10	10-13	13-15
C16	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-16

	1-3	3-5	5-8	8-10	10-13	13-15
C17	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-17

	1-3	3-5	5-8	8-10	10-13	13-15
C18	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-18

	1-3	3-5	5-8	8-10	10-13	13-15
B10	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-10

Depth Interval 10 feet
Concentration in ug/Kg

• No Analysis
• Below Detection Limit
• Below Practical Quantitation Limit

Soil Screening Level	Wing Chloride	Trichloroethene	Tetrachloroethene
cis-1,2-DCE	200 ug/Kg	20 ug/Kg	40 ug/Kg

Pathway Specific
Values (ug/Kg)

Ingestion	Inhalation
100	1500000
780000	3000
17000	11000

20 ft

Chem-Plate Industries
Maywood, Illinois

Figure 7

Exceedances Above Tier
Ingestion only (indicated)

J/R Auto Clinic

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

Constituent	Ingestion (mg/Kg)	Inhalation (mg/Kg)	Migration to Groundwater Route (mg/Kg)	
			Class I	Class II
Vinyl Chloride	3	0.06	0.01	
cis-1,2-DCE	20,000	1200	0.4	1.1
Trichloroethene	520	8.9	0.06	0.3
tetrachloroethene	110	20	0.06	0.3

R000049

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-11

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-4

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-5

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-3

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-12

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-6

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-7

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-25

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-8

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-9

C-10

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-26

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-13

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-11

C-23

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-22

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-7

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-14

C-24

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-8

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-20

C-21

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-15

C-19

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-16

C-17

C-18

	1-3	2-5	6-8	8-10	11-13	13-15
BA	-	-	-	-	-	-
VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-9

B-10

Depth Interval is feet
Concentration in ug/Kg

No Analysis
Below Detection Limit
Below Practical Quantitation Limit

VC-Vinyl Chloride
cis-1,2-DCE
TCE-Trichloroethene
PCE-Tetrachloroethene

Soil Screening Level
15 ug/Kg
200 ug/Kg
20 ug/Kg
40 ug/Kg

Pathway Specific
Values (ug/Kg)

Ingestion Inhalation
780000 1500000
58000 3000
12000 11000

20 ft

Chem-Plate Industries
Maywood, Illinois

Figure 8

Exceedance Above Tier
Inhalation CUB (ind/cows)

J/R Auto clinic

Contaminant	Ingestion (mg/kg)	Inhalation (mg/kg)	Migration to Groundwater Route (mg/kg)	
			Class I	Class II
Vinyl Chloride	3	0.06	0.01	
cis-1,2-DCE	20,000	1200	0.4	1.1
Trichloroethene	520	8.9	0.06	0.3
Tetrachloroethene	110	20	0.06	0.3

R000050

B-2

BA	1-3	2-5	6-8	9-10	11-13	13-15
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

BA	1-3	2-5	6-8	9-10	11-13	13-15
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-11

BA	1-3	2-5	6-8	9-10	11-13	13-15
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-3

B-4

B-5

BA	1-3	2-5	6-8	9-10	11-13	13-15
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-12

BA	1-3	2-5	6-8	9-10	11-13	13-15
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-6

C-7

C-25

BA	1-3	2-5	6-8	9-10	11-13	13-15
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-6

BA	1-3	2-5	6-8	9-10	11-13	13-15
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-8

C-9

C-10

C-26

B-13

BA	1-3	2-5	6-8	9-10	11-13	13-15
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-11

C-12

C-23

BA	1-3	2-5	6-8	9-10	11-13	13-15
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-13

C-22

BA	1-3	2-5	6-8	9-10	11-13	13-15
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-7

C-24

B-8

BA	1-3	2-5	6-8	9-10	11-13	13-15
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-14

C-20

C-21

BA	1-3	2-5	6-8	9-10	11-13	13-15
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-15

C-19

BA	1-3	2-5	6-8	9-10	11-13	13-15
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-16

C-17

C-18

BA	1-3	2-5	6-8	9-10	11-13	13-15
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-10

B-9

Depth Interval in feet
Concentration in ug/kg

No Analysis
BDL-Below Detection Limit
SPQL-Below Practical Quantitation Limit

VC-Vinyl Chloride
cis-1,2-DCE
TCE-Trichloroethene
PCE-Tetrachloroethene

Soil Screening Level
15 ug/kg
200 ug/kg
30 ug/kg
40 ug/kg

VC-Vinyl Chloride
cis-1,2-DCE
TCE-Trichloroethene
PCE-Tetrachloroethene

Pathway Specific Values (ug/kg)
Ingestion
150000
12000
11000

Exceedance Above Threshold
Migration to GW Route

Chem-Plate Industries
Maywood, Illinois

Figure 9

20 ft

J/R Auto clinic

Contaminant	Injection (mg/kg)	Inhalation (mg/kg)	Migration to Groundwater (mg/kg)	
			Class I	Class II
Vinyl Chloride	1	0.06	0.01	
cis-1,2-DCE	25,000	1,200	0.4	1.1
Trichloroethene	120	6.9	0.06	0.3
Tetrachloroethene	110	20	0.06	0.3

R000051

B-2

	1-3	3-5	5-8	8-10	10-11	11-15
B2 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-11

	1-3	3-5	5-8	8-10	10-11	11-15
B11 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-4

	1-3	3-5	5-8	8-10	10-11	11-15
B4 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-5

	1-3	3-5	5-8	8-10	10-11	11-15
B5 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-3

	1-3	3-5	5-8	8-10	10-11	11-15
B3 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

	1-3	3-5	5-8	8-10	10-11	11-15
B12 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-12

	1-3	3-5	5-8	8-10	10-11	11-15
B6 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-13

	1-3	3-5	5-8	8-10	10-11	11-15
B13 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

	1-3	3-5	5-8	8-10	10-11	11-15
B7 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

	1-3	3-5	5-8	8-10	10-11	11-15
C6 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-6

	1-3	3-5	5-8	8-10	10-11	11-15
C7 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-7

	1-3	3-5	5-8	8-10	10-11	11-15
C11 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-25

	1-3	3-5	5-8	8-10	10-11	11-15
C8 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-8

	1-3	3-5	5-8	8-10	10-11	11-15
C9 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-9

	1-3	3-5	5-8	8-10	10-11	11-15
C10 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-10

	1-3	3-5	5-8	8-10	10-11	11-15
C26 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-26

	1-3	3-5	5-8	8-10	10-11	11-15
C12 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-12

C-11

	1-3	3-5	5-8	8-10	10-11	11-15
C13 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-13

	1-3	3-5	5-8	8-10	10-11	11-15
C23 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-23

	1-3	3-5	5-8	8-10	10-11	11-15
C24 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-24

	1-3	3-5	5-8	8-10	10-11	11-15
C22 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-22

C-24

	1-3	3-5	5-8	8-10	10-11	11-15
B8 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-8

	1-3	3-5	5-8	8-10	10-11	11-15
C14 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-14

	1-3	3-5	5-8	8-10	10-11	11-15
C20 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-20

	1-3	3-5	5-8	8-10	10-11	11-15
C21 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-21

	1-3	3-5	5-8	8-10	10-11	11-15
C15 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-15

	1-3	3-5	5-8	8-10	10-11	11-15
C19 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-19

	1-3	3-5	5-8	8-10	10-11	11-15
C16 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-16

	1-3	3-5	5-8	8-10	10-11	11-15
C17 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-17

	1-3	3-5	5-8	8-10	10-11	11-15
C18 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

C-18

	1-3	3-5	5-8	8-10	10-11	11-15
B9 VC	-	-	-	-	-	-
cis-1,2-DCE	-	-	-	-	-	-
TCE	-	-	-	-	-	-
PCE	-	-	-	-	-	-

B-9

B-10

Depth Interval in feet
Concentration in ug/kg

No Analysis
Below Detection Limit
Below Practical Quantitation Limit

VC-Vinyl Chloride
cis-1,2-DCE
TCE-Trichloroethene
PCE-Tetrachloroethene

Pathway Specific
Values (ug/kg)

Ingestion Inhalation
780000 1500000
18000 3000
12000 11000

20 ft

Chem-Plate Industries
Maywood, Illinois

Figure 10

COMMENTS #3 :

CLOSURE LOG # : 658-M-5
 FACILITY : CHEM PLATE IND INC
 STATE ID # : 0311835009
 FED ID # : ILD000665372
 STATUS : P
 TYPE :
 NOTIFY RPMS : N

LOCATION : MAYWOOD 8000052
 COUNTY : COOK
 REVIEWER : MA
 GAU REVIEWER :
 NOTIFY FOS : Y
 NOTIFY CMS : Y
 PN : NA
 INSP :
 2nd-SCHED :
 2nd-RECD :
 60-DUE : **
 2-MAILED : |

1st-RECD : 97/08/04
 90-DUE : 97/11/02
 1-MAILED : 97/10/15
 APP or REJ : APP

CERTIFICATION DUE : 98/06/01

CERTIFICATION RECD :

CLOSED :

CLEAN CLOSURE :

UNITS CLOSED : S01

CIL SENT :

UNITS REMAIN : NONE

PECL SENT :

G OR T STATUS:

SR: 90 SR2: 60 RP: 90 RP2: ** RP3: **

COMMENTS :

REVIEW TIME: 72 REVIEW TIME2: REVIEW TIME3: PRP: 80 PRP2: PRP3:

CONTAM SOIL-Y/N/? : Y ABOVE PQL-Y/N/? : Y ABOVE CUO-Y/N/? : Y

CONTAM-VO/SVO/M/? : VO

CONTAM GW-Y/N/? : ? ABOVE PQL-Y/N/? : ? ABOVE CUO-Y/N/? : ?

CONTAM-VO/SVO/M/? : ?

REMEDIATION-PROP/IN PROG/COMPLETE/NA:

VOLUME:

UNIT-T/CY:

SOIL VENT-Y/N:

AERATE-Y/N/ON/OFF:

STABILIZE-Y/N/ON/OFF:

CAP IN PLACE-Y/N:

BIOREM-Y/N:

INCIN-Y/N/ON/OFF:

LANDFILL-Y/N/ON/OFF:

TREATMENT-Y/N/ON/OFF:

PUMP & TREAT GW-Y/N:

PROCESS 1: S01	AMOUNT 1: 385	UNIT1: G	ADD/DEL: DEL
PROCESS 2:	AMOUNT 2:	UNIT2:	ADD/DEL:
PROCESS 3:	AMOUNT 3:	UNIT3:	ADD/DEL:
PROCESS 4:	AMOUNT 4:	UNIT4:	ADD/DEL:
PROCESS 5:	AMOUNT 5:	UNIT5:	ADD/DEL:
PROCESS 6:	AMOUNT 6:	UNIT6:	ADD/DEL:

REMEDIED ACREAGE:

- 1) COMPLETE CLOSURE CHECKLISTS (2 FOR NEW CLOSURE PLANS)
- 2) CALL FOS & MAKE SURE THESE ARE CORRECT AREAS TO CLOSE
- 3) STORAGE AREA INTEGRITY (CRACKS, GAPS, JOINTS, CURBS, ETC.)
- 4) STORAGE AREA RUNOFF/DRAINAGE
- 5) SAMPLING PARAMETERS W.R.T. WASTES MANAGED
- 6) SAMPLING METHODS AND LOCATIONS AND DEPTHS
- 7) ANALYTICAL METHODS (SW-846)
- 8) REVIEW NOTES
 - a. Intro to Project -- Site name, location, brief description of submittal
 - b. Pertinent Site History
 - c. Summary/Review/Evaluation of Submittal
 - d. Identification of Final Action to be Taken
 - e. Discussion of Final Action, Including Discussion of Final Letter
- 9) COMPUTER BLANKS
- 10) OCS SUBMITTAL BY _____
- 11) FINAL DRAFT & REVIEW NOTES TO MGR BY _____
- 12) FINAL TO MGR FOR LWE SIGNATURE BY _____



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

R000053

File

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

October 15, 1997

CERTIFIED MAIL
P 344 343 668

Chem-Plate Industries, Inc.
Attn: Mr. Adam Straus
30 North 8th Avenue
Maywood, Illinois 60153

Re: 0311835009 -- Cook County
Chem-Plate Industries, Inc.
ILD000665372
Log No. C-658-M-5
Received: August 4, 1997
RCRA Closure

IEPA
Division of Records Management
Releasable

JUL 16 2026

Reviewer: MDB

Dear Mr. Straus:

This is in response to a July 25, 1997 submittal made on your behalf by Mr. Peter Jay Huck, P.E., of Terra Nova Research, Inc., regarding the RCRA closure of a hazardous waste container storage area (SO1) at the above-referenced facility. This submittal contained a Tiered Approach to Corrective Action Objectives (TACO) evaluation for the soil underlying the storage area. This submittal also concludes that no further remediation is necessary for this project.

The subject submittal was handled as a request to modify the approved closure plan for the container storage area and is hereby approved subject to the following conditions and modifications:

1. Low levels of volatile organic compounds (VOCs) remain in the soil beneath the concrete floor in the vicinity of the container storage area inside the building. These levels will not pose a threat to human health or the environment provided:
 - a. A relatively impermeable barrier such as existing concrete floor is in place over these soils;
 - b. The barrier is properly maintained in the future;
 - c. Restrictions are in place to limit direct human exposure to the soils beneath the cover;
 - d. A site safety plan to address possible work exposure to the soil in this area is developed and implemented for any future excavation/construction activity in this area; and

SCREENED
M M

Mr. Adam Straus
C-658-M-5
Page 2

- e. Any soil removed from this area during future activities is managed as a special waste in accordance with 35 Ill. Adm. Code, Subtitle G: Waste Disposal.
2. As part of the closure activities, a survey plat must be developed which shows the location and dimensions of the contaminated area, relative to the legal boundaries of the site. The plat must be prepared and certified by a professional land surveyor and be developed with respect to permanently surveyed benchmark.
3. The survey plat identified in Condition 2 above must contain a note, prominently displayed, which states that:
 - a. A hazardous waste container storage area was once present at the facility. This container storage area was closed in accordance with an Illinois EPA approved closure plan. The Illinois EPA determined that the area in the vicinity of the container storage area was properly remediated and that no further action was necessary, so long as this note was placed in the deed to the property and the requirements set forth in this note are met.
 - b. Low levels of VOCs remain in the soils beneath the container storage area.
 - c. The low levels of contaminants in the soils beneath the container storage area pose no threat to human health and the environment provided:
 - (1) A concrete floor is in place over the area where soil contamination is present;
 - (2) The cover is properly maintained;
 - (3) Access to the area is restricted so that humans will not come into direct contact with the soils;
 - (4) A site safety plan to address possible worker exposure to the soils in this area must be developed and implemented for any future excavation/construction activities in this area; and
 - (5) Any soil removed from this area during future activities must be managed as a special waste in accordance with 35 Ill. Adm. Code Subtitle G: Waste Disposal.
4. The survey plat identified in Conditions 2 and 3 above must be:

03/18/03

Mr. Adam Straus

C-658-M-5

Page 3

- a. Attached to the deed for the subject property, or on some other instrument which is normally examined during title search, which will in perpetuity notify any potential purchaser of the property of the requirements set forth in the notation identified in Condition 3 above.
 - b. Submitted to the County Recorder, any local zoning authority and any other authority over local land use.
5. A copy of the survey plat required by Conditions 2 and 3 above as well as documentation indicating the requirements of Condition 4 has been met must be submitted to the Illinois EPA along with the closure certification/documentation report required by Condition 6 below.
6. Analysis of a soil sample collected at a depth interval of 8'-10' from boring B-13 (shown on Site Layout Plan of the subject submittal) which is located in an alley west of the on-site building detected trichloroethene at a concentration of 47 mg/kg. The facility must address this contamination by removing the contaminated soil or by imposing institutional controls. Chem-Plate must submit a plan to Illinois EPA by November 15, 1997 which identifies how the soil contamination detected in the vicinity of soil boring B-13 will be addressed. This plan should be developed in accordance with the procedures set forth in 35 Ill. Adm. Code 725, Subpart G and 35 Ill. Adm. Code 742. The attached RCRA closure plan guidance document should also be used in the development of this plan.
7. Closure activities should be completed by April 1, 1998. When closure is complete the owner or operator must submit to the Illinois EPA certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification should be received at the Illinois EPA within sixty (60) days after closure or by June 1, 1998. These dates may be revised if Chem-Plate finds that additional time is necessary to complete all required closure activities and Chem-Plate demonstrates to the Illinois EPA that it is attempting to complete closure in a timely manner.

The attached closure certification form must be used. Signatures must meet the requirement of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Illinois EPA approves the facility's closure certification.

Mr. Adam Straus
C-658-M-5
Page 4

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E. Plans and specifications, designs, drawings, reports, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

As part of the closure certification, to document the closure activities at the subject facility, please submit a Closure Documentation Report which includes:

- a. the volume of waste, waste residue and contaminated soil removed, including wastes resulting from decontamination activities. Actual disposition of this waste must also be described;
- b. scaled drawings showing the horizontal and vertical boundaries from which any contaminated soil was removed;
- c. a description of the method of waste handling and transport;
- d. waste manifest numbers;
- e. copies of the waste manifests;
- f. a description of the sampling and analytical methods used including sample preservation methods and chain-of-custody information;
- g. a chronological summary of closure activities and the cost involved;
- h. color photo documentation of the subject area/activities before, during and after closure;
- i. information documenting the results of all soil sampling/analysis efforts. The goal of presenting this information should be to describe, in a logical manner, the activities and results associated with the sampling/analysis effort. At a minimum, this information must include:
 - (1) identification of the reason for the sampling/analysis effort and the goals of the effort;

Mr. Adam Straus

C-658-M-5

Page 5

- (2) a summary in tabular form of all analytical data, including all quality assurance/quality control data;
 - (3) a scaled drawing showing the horizontal and vertical locations where all soil samples were collected;
 - (4) a description of the soil sampling procedures, sample preservation procedures, chain of custody procedures and quality assurance/quality control procedures;
 - (5) identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical inferences;
 - (6) copies of the final laboratory report sheets;
 - (7) visual classification of each soil sample in accordance with ASTM D-2488;
 - (8) a discussion of the data, as it relates to the overall goal of the sampling/analysis effort;
- j. information required by Condition 5 above.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Illinois EPA by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control -- #33
Permit Section
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

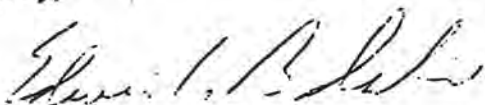
8. The approval of this closure plan does not resolve any of this facility's possible violations of 35 IAC 725, Subpart H (Financial Requirements). Any such possible violation will not be resolved (and the facility will remain out of compliance) until: (1) adequate financial assurance is established; or (2) the Illinois EPA approves the certification of final closure for the facility.
9. The approval of this closure plan will not: (1) resolve any of this facility's possible violations of the Illinois Environmental Protection Act and/or 35 Ill. Adm. Code, Subtitle G: Waste Disposal; or (2) prevent the USEPA or IEPA from pursuing enforcement proceedings and monetary penalties as a result of the afore-mentioned possible violations.

Mr. Adam Straus
C-658-M-5
Page 6

10. The attached form entitled RCRA Interim Status Closure and Post-Closure Plans General Form (LPC-PA18) must be completed and accompany all information submitted to the Illinois EPA associated with the RCRA closure activities described in this letter. As noted on the form, two copies must accompany the original of all submittals, so that the information can be distributed to the appropriate Illinois EPA personnel, including regional offices.

Should you have any questions regarding this matter, please contact Munib Ahmad at 217/524-3300.

Sincerely,



Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

ECB:MA:bjh\971111S.WPD

Attachment: Closure Certification Statement
LPC PA-18
RCRA Closure Plan Guidance (draft, November 1994)

cc: Peter Jay Huck - Terra Nova Research
Christopher Nowotarski - Stone, Pogrun, Korey and Spagat
Mike Mackoff - AGO, Chicago

bcc: Bureau File
Maywood Region
Peter Orlinsky - DLC
Jim Moore
Munib Ahmad

Closure Certification Statement

Closure Log C-658

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

The hazardous waste container storage area (S01) at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

 USEPA ID Number

 Facility Name

 Signature of Owner/Operator Date

 Name and Title

 Signature of Registered P.E. Date

 Name of Registered P.E. and Illinois
Registration Number

 Mailing Address of P.E.:

 Registered P.E.'s Seal:

ECB:MA:bjh971112.WPD

C-658-M-7

Information Submitted by Facility

- 12/11/03 letter from Christopher T. Nowotarski, Stone, Pogrud & Korey

C-658-M-7

cc: DesPlaines

R000061

JKM
BAI

STONE, POGRUND & KOREY

LAW OFFICES

32ND FLOOR
221 NORTH LASALLE STREET
CHICAGO, ILLINOIS 60601
TELEPHONE: (312) 782-3636
FACSIMILE: (312) 782-1482
WEB SITE: www.spklaw.com

BERTRAM A. STONE (1915-1994)
SHERWIN I. POGRUND, P.C.
MARTIN S. KOREY
JAMES P. ZIEGLER
DAVID B. POGRUND
CHRISTOPHER T. NOWOTARSKI, P.C.
LAWRENCE J. STARK
CARTER A. KOREY
DEAN J. LURIE

WRITER'S E-MAIL:
cnowotarski@spklaw.com

December 11, 2003

IEPA, Bureau of Land
1021 N. Grand Avenue East
PO Box 19276
Springfield, IL 62794
Attn: Joyce Munie

Re: Chem Plate Maywood Facility

Dear Ms. Munie:

As you may be aware, this office represents Chem-Plate Industries, Inc. regarding the closure of their Maywood Facility. In order to receive no further remediation letter, we have enclosed a draft Environmental Land Use Control Agreement for the facility located in Maywood, Illinois, and a separate Environmental Land Use Control Agreement for the neighbor's property.

After you have reviewed these Agreements please call the undersigned to discuss any issues or additions to the Agreement you may require.

RECEIVED

DEC 19 2003

**IEPA - BOL
PERMIT SECTION**

Very truly yours,

STONE, POGRUND & KOREY

Christopher T. Nowotarski/cs

Christopher T. Nowotarski

CTN/cs

cc: Chem-Plate, Inc., Attn. Mr. Jim See
Peter J. Huck

PREPARED BY:**Name:** Christopher T. Nowotarski**Address** Stone, Pogrund & Korey
221 N. LaSalle Street, #3200
Chicago, Illinois 60601**RETURN TO:****Name:** Christopher T. Nowotarski**Address** Stone, Pogrund & Korey
221 N. LaSalle Street, #3200
Chicago, Illinois 60601**THE ABOVE SPACE FOR RECORDER'S OFFICE****Environmental Land Use Control**

THIS ENVIRONMENTAL LAND USE CONTROL ("ELUC"), is made this _____ day of _____, 200__, by Tim Megenbier, ("Property Owner") of the real property located at the common address 15 North 9th Avenue, Maywood, Illinois ("Property").

WHEREAS, 415 ILCS 5/58.17 and 35 Ill. Adm. Code 742 provide for the use of an ELUC as an institutional control in order to impose land use limitations requirements related to environmental contamination so that persons conducting remediation can obtain a No Further remediation determination from the Illinois Environmental Protection Agency ("IEPA"). The reason for an ELUC is to ensure protection of human health and the environment. The limitations and requirements contained herein are necessary in order to protect against exposure to contained soil or groundwater or both, that may be present on the property as a result of metal finishing activities. Under 35 Ill. Adm. code 742, the use or risk-based, site-specific remediation objectives may require that use of an ELUC on real property, and the ELUC may apply to certain physical features (e.g. engineered barriers, monitoring wells, caps, etc.).

WHEREAS, Tim Megenbier intends to request risk-based, site specific soil and groundwater remediation objectives from IEPA under 35 Ill. Adm.Code 742 to obtain risk-based closure of the site, identified by Bureau of Land LPC: 0311835009 , utilizing an ELUC.

NOW, THEREFORE, the recitals set forth above are incorporated by reference as if fully set forth herein, and the Property Owner agrees as follows:

Section One. Property Owner does hereby establish an ELUC on the real estate, situated in the County of Cook, State of Illinois and further described in Exhibit A attached hereto and incorporated herein by reference (the "Property").

Attached as Exhibit B are site maps that show the legal boundary of the Property, any physical features to which the ELUC applies, the horizontal and vertical extent of the contaminants of concern above the applicable remediation objectives for soil or groundwater or both, and the nature, location of the source, and direction of movement of the contaminants of concern, as required under 35 Ill. Adm. Code 742.

Section Two. Property Owner represents and warrants **it** is the current owner of the Property and has the authority to record this ELUC on the chain of title for the Property with the Office of the Recorder in Cook County, Illinois.

Section Three. The Property Owner hereby agrees, for itself, and its officers, directors, employees, grantees, successors, assigns, transferees and any other owner, occupant, lessee, possessor or user of the Property or the holder of any portion thereof or interest therein, that the groundwater under the Property shall not be used as a potable supply of water, and any contaminated groundwater or soil that is removed, excavated, or disturbed from the Property described in Exhibit A herein must be handled in accordance with all applicable laws and regulations.

Section Four. This ELUC is binding on the Property Owner, for itself, its officers, directors, employees, grantees, successors, assigns, transferees and any other owner, occupant, lessee, possessor or user of the Property or the holder of any portion thereof or interest therein. This ELUC shall apply in perpetuity against the Property and shall not be released until the IEPA determines there is no longer a need for this ELUC as an institutional control; until the IEPA, upon written request, issues a new no further remediation determination approving modification or removal of the limitation(s) or requirement(s); and until and a release or modification of the land use limitation or requirement is filed on the chain of title for the Property.

Section Five. Information regarding the remediation performed on the Property may be obtained from the IEPA through a request under the Freedom of Information Act (5 ELCS 140) and rules promulgated thereunder by providing the IEPA with the LPC 0311835009 listed above.

Section Six. The effective date of this ELUC shall be the date that it is officially recorded in the chain of title for the Property to which the ELUC applies.

WITNESS the following signatures:

Property Owner(s)

Tim Megenbier

Date: _____

STATE OF ILLINOIS)
) SS:
COUNTY OF)

I, _____ the undersigned, a Notary Public for said County and State, **DO**
HEREBY CERTIFY, that _____, personally known to me to be the same persons
whose name is subscribed to the foregoing instrument, appeared before me this day in person and
severally acknowledged that in said capacity he signed and delivered the said instrument as his
free and voluntary act for the uses and purposes therein set forth.

Given under my hand and official seal, this ____ day of _____, 20__.

Notary Public

PIN NO. XX-XX-XXX-XXX-XXXX
(Parcel Index Number)

Exhibit A

The subject property is located in the City of Maywood, Illinois County, State of Illinois, commonly known as 15 North 9th Avenue, Maywood, Illinois and more particularly described as:

Lots 29 and 39 both inclusive in Block 198 in Maywood a Subdivision in Section 2, 11 and 14, Township 39 North, 12 East of the Third Principal Meridian, in Cook County, Illinois

COMMON ADDRESS;	15 North 9 th Avenue, Maywood, Illinois
REAL ESTATE TAX INDEX OR PARCEL #	15-11-132-005, 006, 007 & 031
(PURSUANT TO 742. 1010(D)(2))	

PIN NO. XX-XX-XXX-XXX-XXXX

Exhibit B

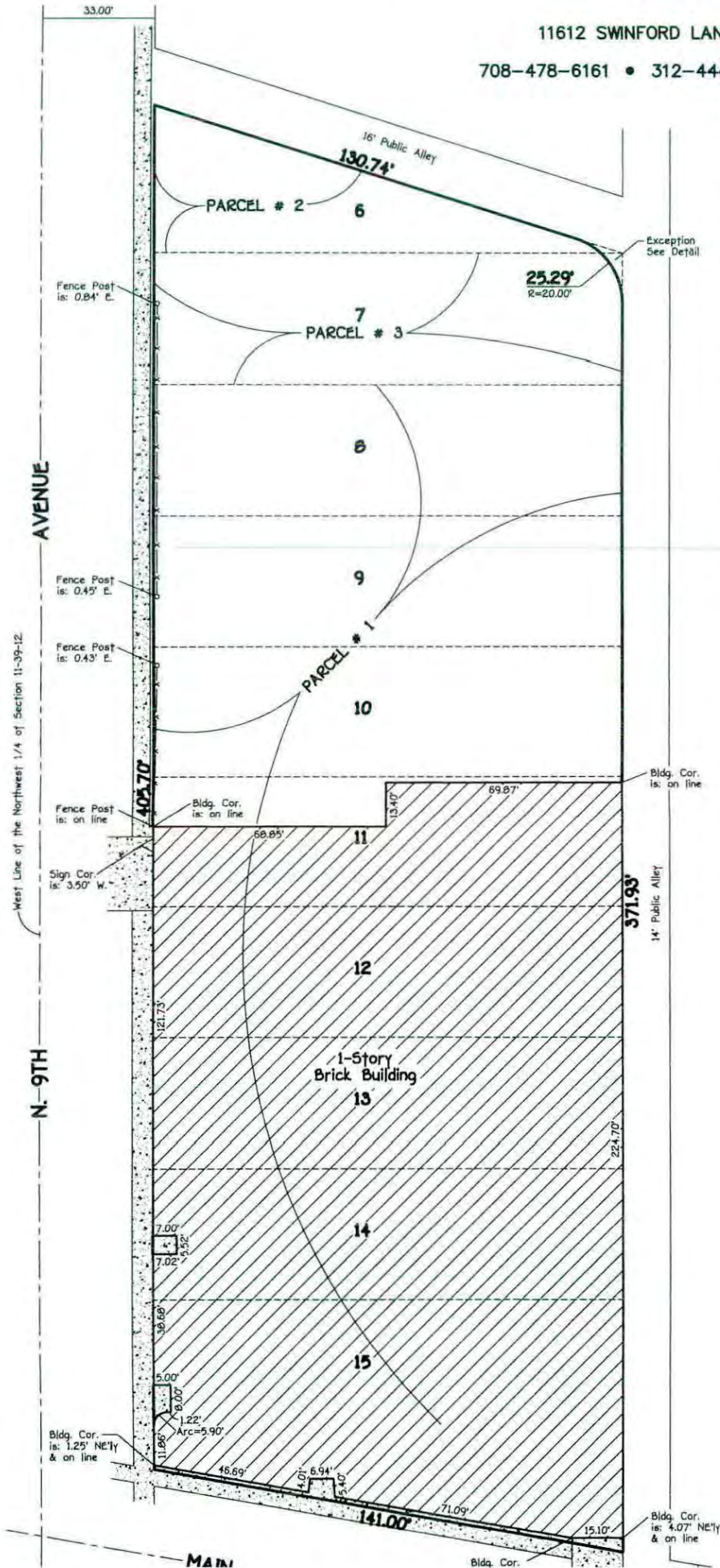
IN ACCORDANCE WITH SECTION 742.1010(D)(8)(A)-(D), PROVIDE ALL THE FOLLOWING ELEMENTS. ATTACH SEPARATE SHEETS, LABELED AS EXHIBIT B, WHERE NECESSARY.

- (A) A scaled map showing the legal boundary of the property to which the ELUC applies.
- (B) Scaled maps showing the horizontal and vertical extent of contaminants of concern above the applicable remediation objectives for soil and groundwater to which the ELUC applies.
- (C) Scaled maps showing the physical features to which an ELUC applies (e.g., engineered barriers, monitoring wells, caps, etc.).
- (D) Scaled maps showing the nature, location of the source, and direction of movement of the contaminants of concern.

11612 SWINFORD LANE • MOKENA, IL 60448

708-478-6161 • 312-444-9240 • FAX 708-478-71

of



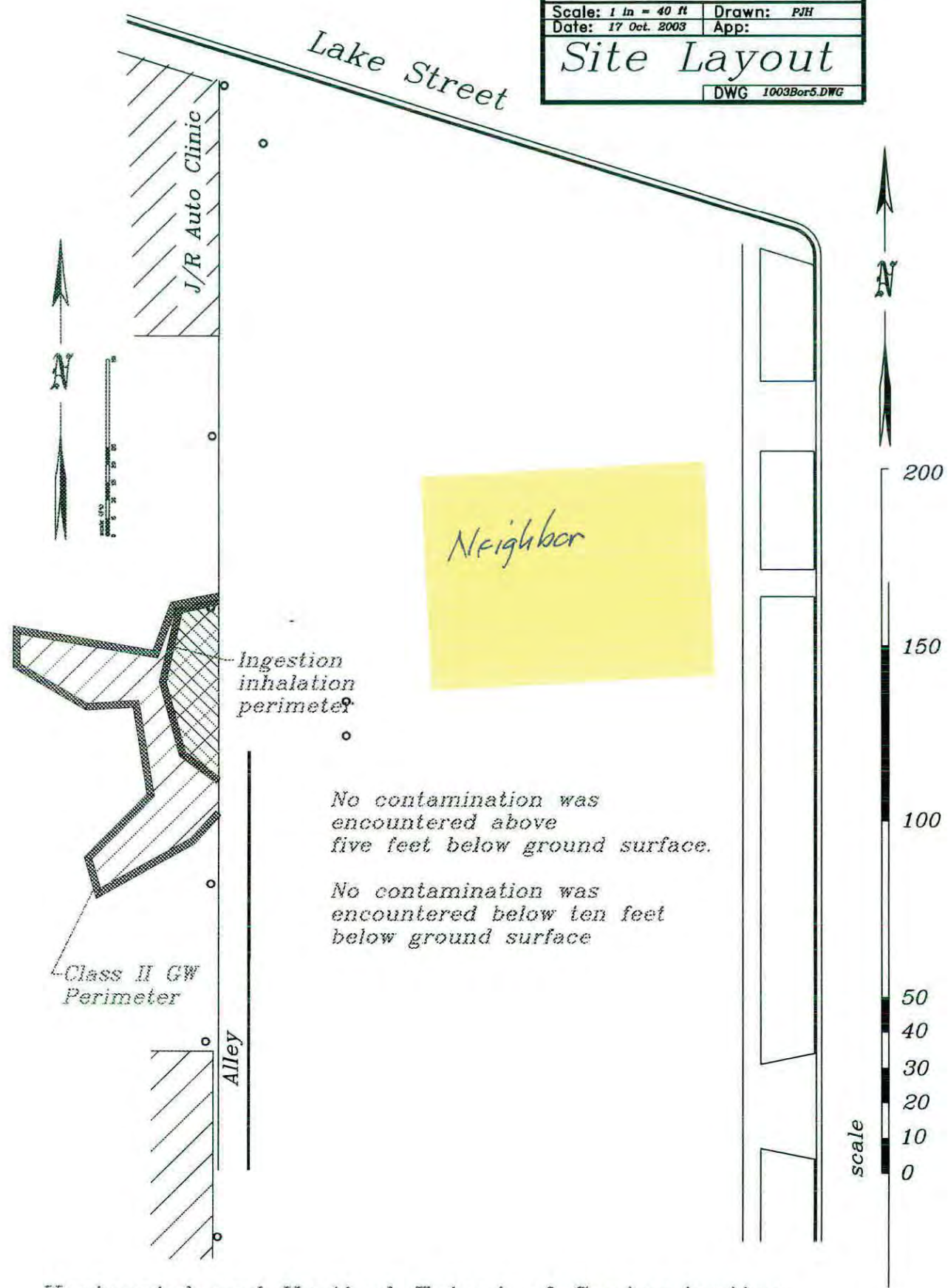
PARCEL 1:
LOTS 8 TO 15, BOTH 1
WEST 1/2 OF BLOCK 1
14, TOWNSHIP 39 NORTH
IN COOK COUNTY, ILLINOIS

PARCEL 2:
LOT 6 (EXCEPT THAT F
NORTHEASTERLY CORNER
NORTHERLY LINE OF 5/
RADIUS OF 20.00 FEET
TANGENT TO LAST DES
OF 8.77 FEET TO INTER
OF LOT 6; THENCE EAST
POINT OF BEGINNING) IN
198 IN MAYWOOD, IN S
THIRD PRINCIPAL MERIDIAN

PARCEL 3:
LOT 7 (EXCEPT THAT F
BEGINNING AT A POINT
LOT 7 HEREINAFTER DE
HAVING A RADIUS OF 2
LINE, TANGENT TO THE
CHORD DISTANCE OF 16
WITH THE NORTH LINE
OF SAID LOT 7, 6.40 F
THENCE SOUTH ALONG
PLACE OF BEGINNING) IN
198 IN MAYWOOD, A S
OF SECTION 2, THE WE
SECTION 14, TOWNSHIP
MERIDIAN, IN COOK COU

South Line of Lot
North Line of Lot

Terra Nova Research	
Scale: 1 in = 40 ft	Drawn: PJH
Date: 17 Oct. 2003	App:
<i>Site Layout</i>	
DWG 1003Bor5.DWG	



No contamination was encountered above five feet below ground surface.

No contamination was encountered below ten feet below ground surface

Horizontal and Vertical Extent of Contamination

Terra Nova Research

Scale: 1 in = 40 ft

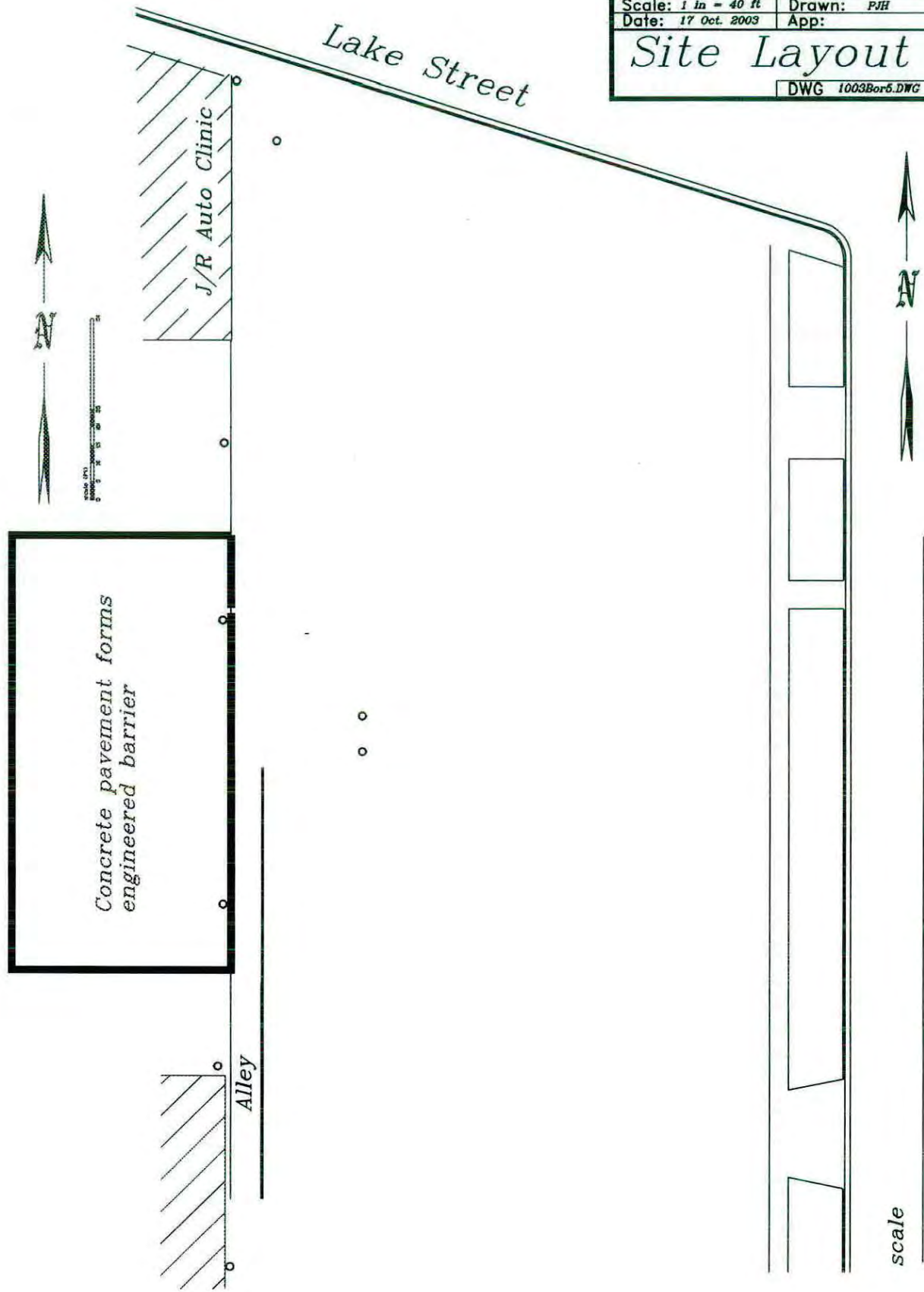
Drawn: PJH

Date: 17 Oct. 2003

App:

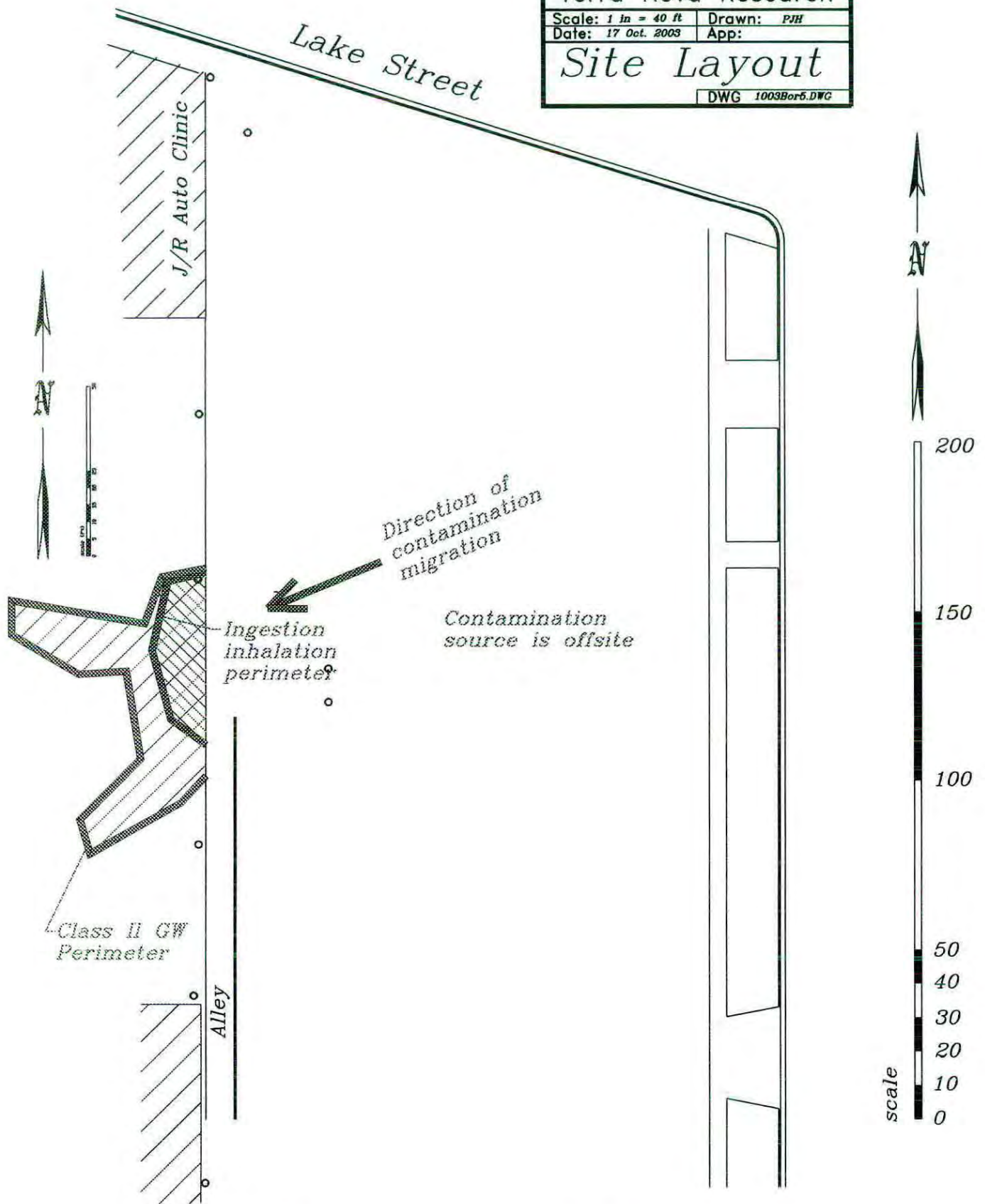
Site Layout

DWG 1003Bor5.DWG



Engineered Barrier

Terra Nova Research	
Scale: 1 in = 40 ft	Drawn: PJH
Date: 17 Oct. 2003	App:
Site Layout	
DWG 1003Bor5.DWG	



Direction of Contamination Migration

C-658-M-7

Information Submitted by Facility

1/16/04 Revised ELUC

LAW OFFICES
STONE, POGRUND & KOREY32ND FLOOR
221 NORTH LASALLE STREET
CHICAGO, ILLINOIS 60601
TELEPHONE: (312) 782-3636
FACSIMILE: (312) 782-1482
WEB SITE: www.spklaw.comBERTRAM A. STONE (1915-1994)
SHERWIN I. POGRUND, P.C.
MARTIN S. KOREY
JAMES P. ZIEGLER
DAVID B. POGRUND
CHRISTOPHER T. NOWOTARSKI, P.C.
LAWRENCE J. STARK
CARTER A. KOREYWRITER'S E-MAIL:
cnowotarski@spklaw.com**FACSIMILE TRANSMITTAL FORM**

THE INFORMATION TRANSMITTED BY THIS FACSIMILE IS CONSIDERED ATTORNEY PRIVILEGED AND CONFIDENTIAL AND IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE TO DELIVER IT TO THE INTENDED RECIPIENT, YOU SHOULD BE AWARE THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THE COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.

PLEASE DELIVER IMMEDIATELY**To:** Jim Moore**Fax:** 217-524-3291**From:** Christopher T. Nowotarski**Re:** Chem Plate Industries**Date:** January 16, 2004**Number
of Pages:**12

(including this page)

Copy to:

Note: Attached please find a draft Environmental Land Use Control Agreement for Chem Plate's facility located at 30 N. 8th Ave in Maywood, Illinois.

Please call with questions or comments.

Cc: Joyce Munie **Fax:** 217-524-3291

If there is a problem with this transmission or if you do not receive all of the pages, please call 312/782-3636.

RELEASABLE

MAY 10 2004

REVIEWER MM

PREPARED BY:

Name: Christopher T. Nowotarski
Address Stone, Pogrund & Korey
221 N. LaSalle Street, #3200
Chicago, Illinois 60601

RETURN TO:

Name: Christopher T. Nowotarski
Address Stone, Pogrund & Korey
221 N. LaSalle Street, #3200
Chicago, Illinois 60601

THE ABOVE SPACE FOR RECORDER'S OFFICE

Environmental Land Use Control

THIS ENVIRONMENTAL LAND USE CONTROL ("ELUC"), is made this _____ day of _____, 200 __, by Rentabilite, L.L.C., ("Property Owner") and Chem-Plate Industries, Inc. ("Property Occupant") of the real property located at the common address 30 North 8th Avenue, Maywood, Illinois ("Property").

WHEREAS, 415 ILCS 5/58.17 and 35 Ill. Adm. Code 742 provide for the use of an ELUC as an institutional control in order to impose land use limitations requirements related to environmental contamination so that persons conducting remediation can obtain a No Further remediation determination from the Illinois Environmental Protection Agency ("IEPA"). The reason for an ELUC is to ensure protection of human health and the environment. The limitations and requirements contained herein are necessary in order to protect against exposure to ~~contained soil~~ ^{contaminated} or groundwater or both, that may be present on the property as a result of metal finishing activities. Under 35 Ill. Adm. code 742, the use or risk-based, site-specific remediation objectives may require that use of an ELUC on real property, and the ELUC may apply to certain physical features (e.g. engineered barriers, monitoring wells, caps, etc.).

WHEREAS, Chem-Plate Industries, Inc. intends to request risk-based, site specific soil and groundwater remediation objectives from IEPA under 35 Ill. Adm. Code 742 to obtain risk-based closure of the site, identified by Bureau of Land LPC: 0311835009 , utilizing an

ELUC.

NOW, THEREFORE, the recitals set forth above are incorporated by reference as if fully set forth herein, and the Property Owner & Property Occupant agree as follows:

Section One. Property Owner does hereby establish an ELUC on the real estate, situated in the County of Cook, State of Illinois and further described in Exhibit A attached hereto and incorporated herein by reference (the "Property").

Attached as Exhibit B are site maps that show the legal boundary of the Property, any physical features to which the ELUC applies, the horizontal and vertical extent of the contaminants of concern above the applicable remediation objectives for soil or groundwater or both, and the nature, location of the source, and direction of movement of the contaminants of concern, as required under 35 Ill. Adm. Code 742.

Section Two. Property Owner represents and warrants it is the current owner of the Property and has the authority to record this ELUC on the chain of title for the Property with the Office of the Recorder in Cook County, Illinois.

Section Three. The Property Owner hereby agrees, for itself, and its officers, directors, employees, grantees, successors, assigns, transferees and any other owner, occupant, lessee, possessor or user of the Property or the holder of any portion thereof or interest therein, that the groundwater under the Property shall not be used as a potable supply of water, and any contaminated groundwater or soil that is removed, excavated, or disturbed from the Property described in Exhibit A herein must be handled in accordance with all applicable laws and regulations.

Section Four. This ELUC is binding on the Property Owner, for itself, its officers, directors, employees, grantees, successors, assigns, transferees and any other owner, occupant, lessee, possessor or user of the Property or the holder of any portion thereof or interest therein. This ELUC shall apply in perpetuity against the Property and shall not be released until the IEPA determines there is no longer a need for this ELUC as an institutional control; until the IEPA, upon written request, issues a new no further remediation determination approving modification or removal of the limitation(s) or requirement(s); and until a release or modification of the land use limitation or requirement is filed on the chain of title for the Property.

Section Five. Information regarding the remediation performed on the Property may be obtained from the IEPA through a request under the Freedom of Information Act (5 ELCS 140) and rules promulgated thereunder by providing the IEPA with the LPC 0311835009 listed above.

R000076

Section Six. The effective date of this ELUC shall be the date that it is officially recorded in the chain of title for the Property to which the ELUC applies.

WITNESS the following signatures:

Property Owner(s)

Rentabilite, L.L.C.

By: _____

Its: _____

Date: _____

STATE OF ILLINOIS)
) SS:
COUNTY OF)

I, _____ the undersigned, a Notary Public for said County and State, **DO**
HEREBY CERTIFY, that _____ and _____, personally known to me to be
the Operating Manager of the Property Owner(s) of _____, and personally known
to me to be the same person whose name is subscribed to the foregoing instrument, appeared
before me this day in person and severally acknowledged that in said capacities they signed and
delivered the said instrument as their free and voluntary act for the uses and purposes therein set
forth.

Given under my hand and official seal, this ____ day of _____, 20____.

Notary Public

PIN NO. XX-XX-XXX-XXX-XXXX
(Parcel Index Number)

Exhibit A

The subject property is located in the City of Maywood, Illinois County, State of Illinois,
commonly known as 30 North 8th Avenue, Maywood, Illinois and more particularly described as:

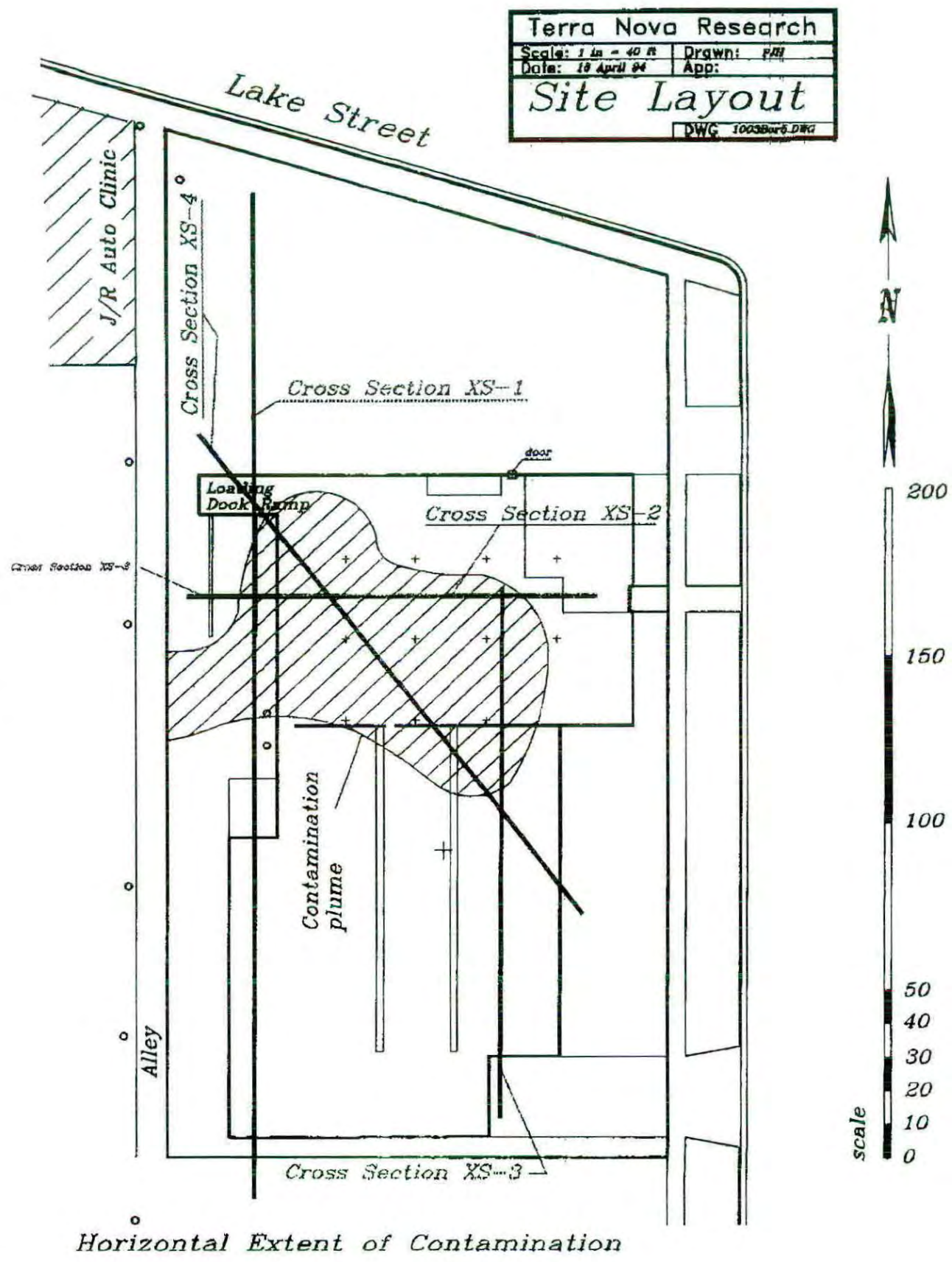
REAL ESTATE TAX INDEX OR PARCEL # 15-11-132-015, 016 & 033

R000079

PIN NO. XX-XX-XXX-XXX-XXXX

Exhibit B

R000080



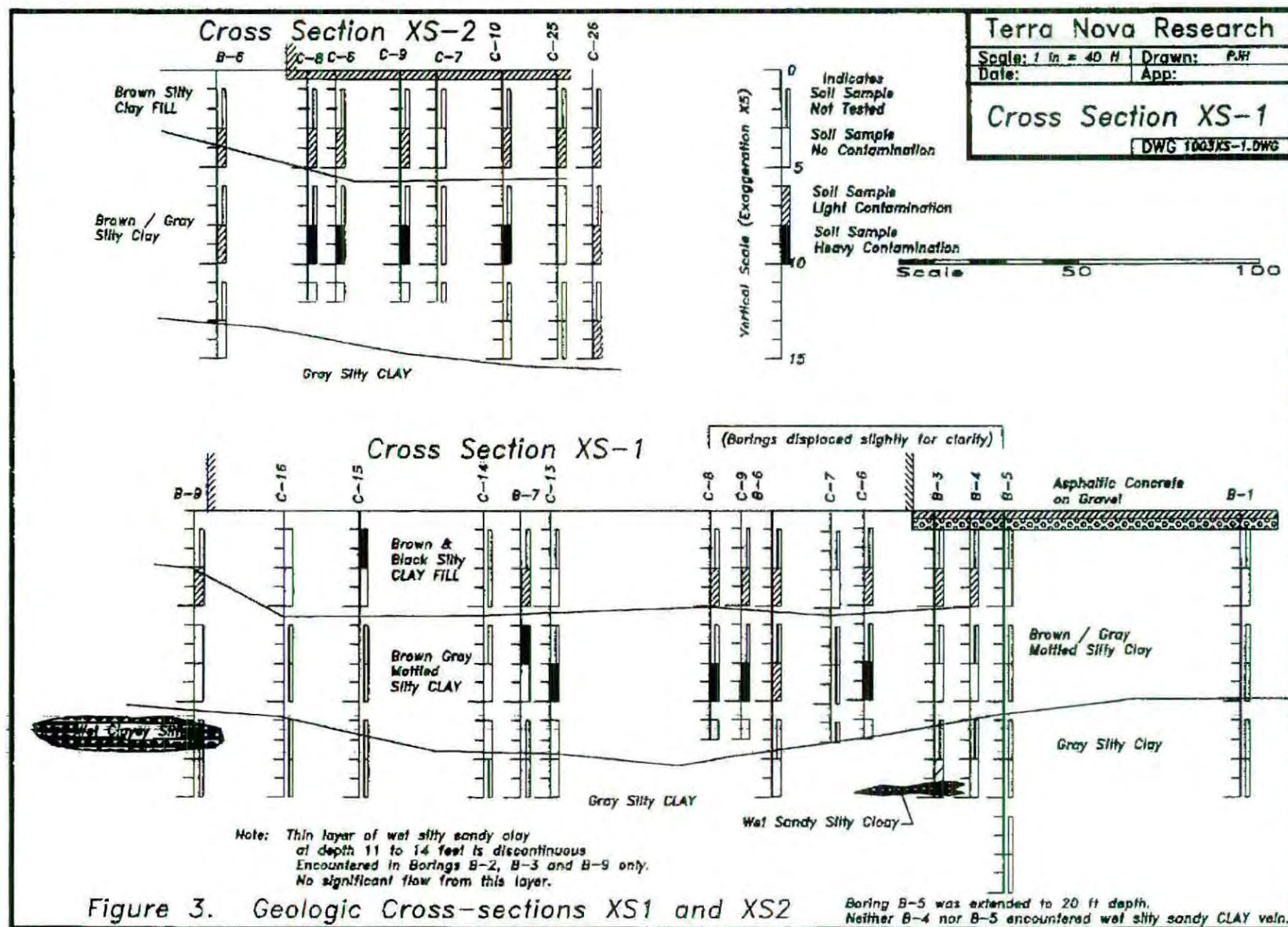
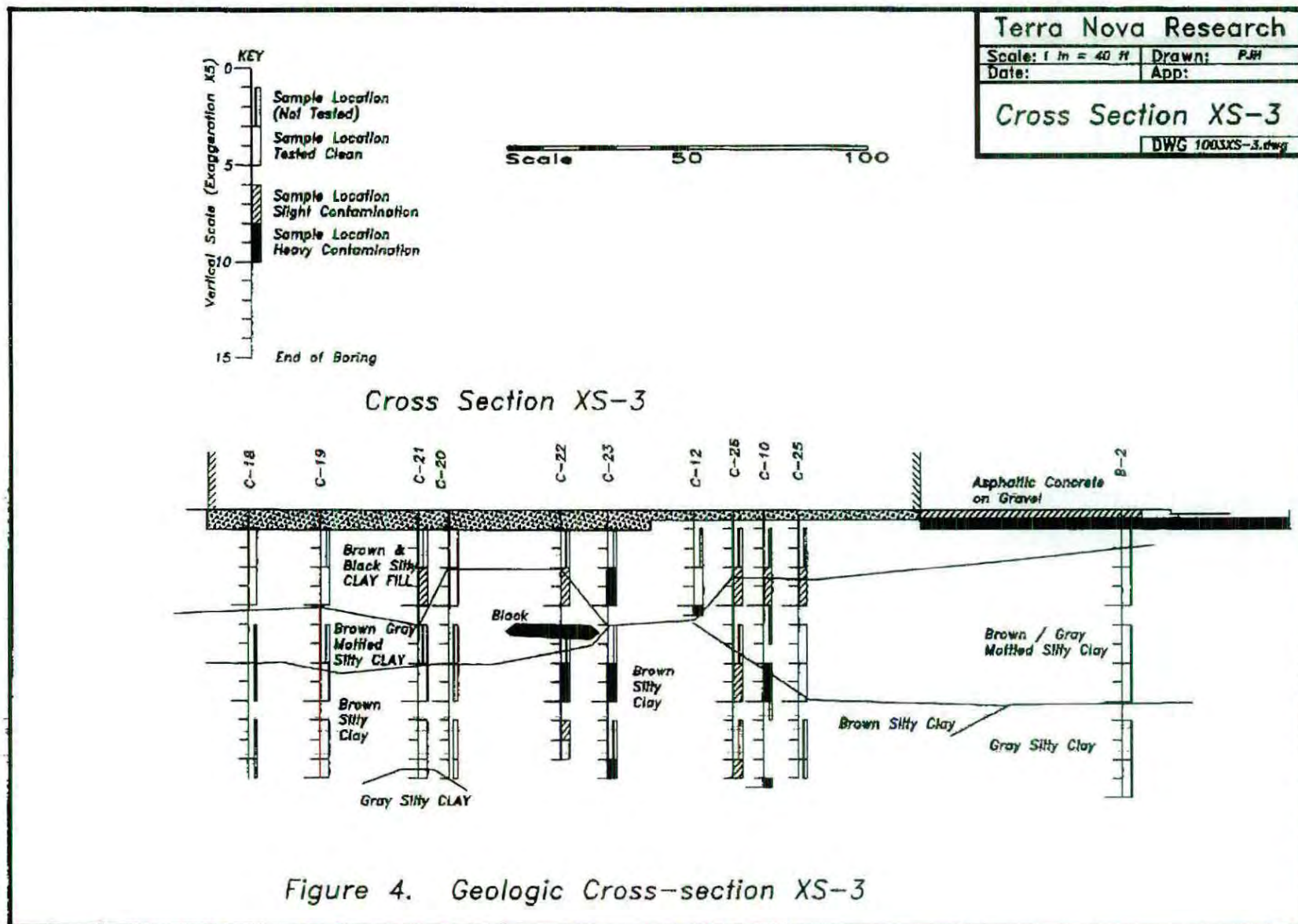
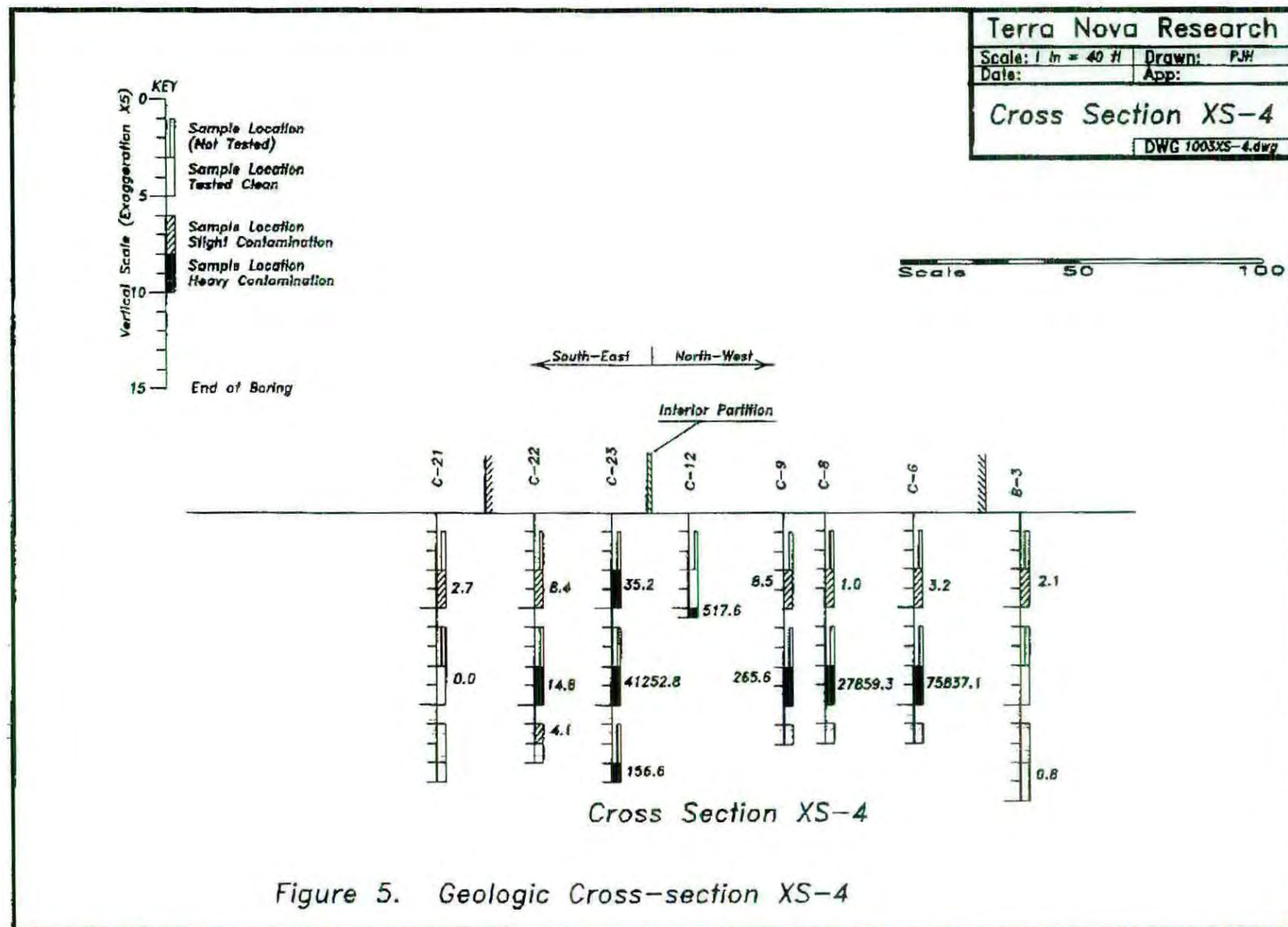
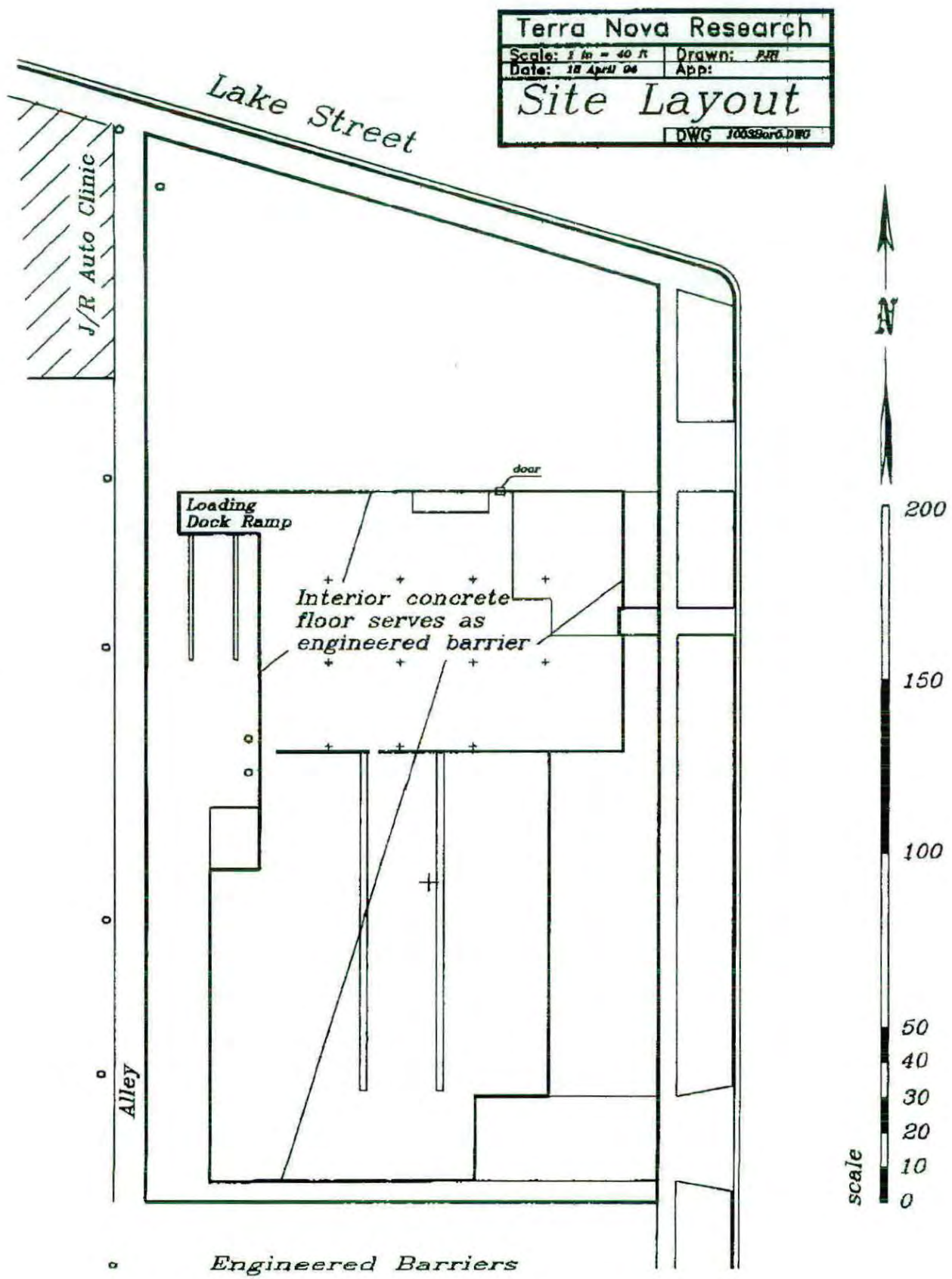


Figure 3. Geologic Cross-sections XS1 and XS2

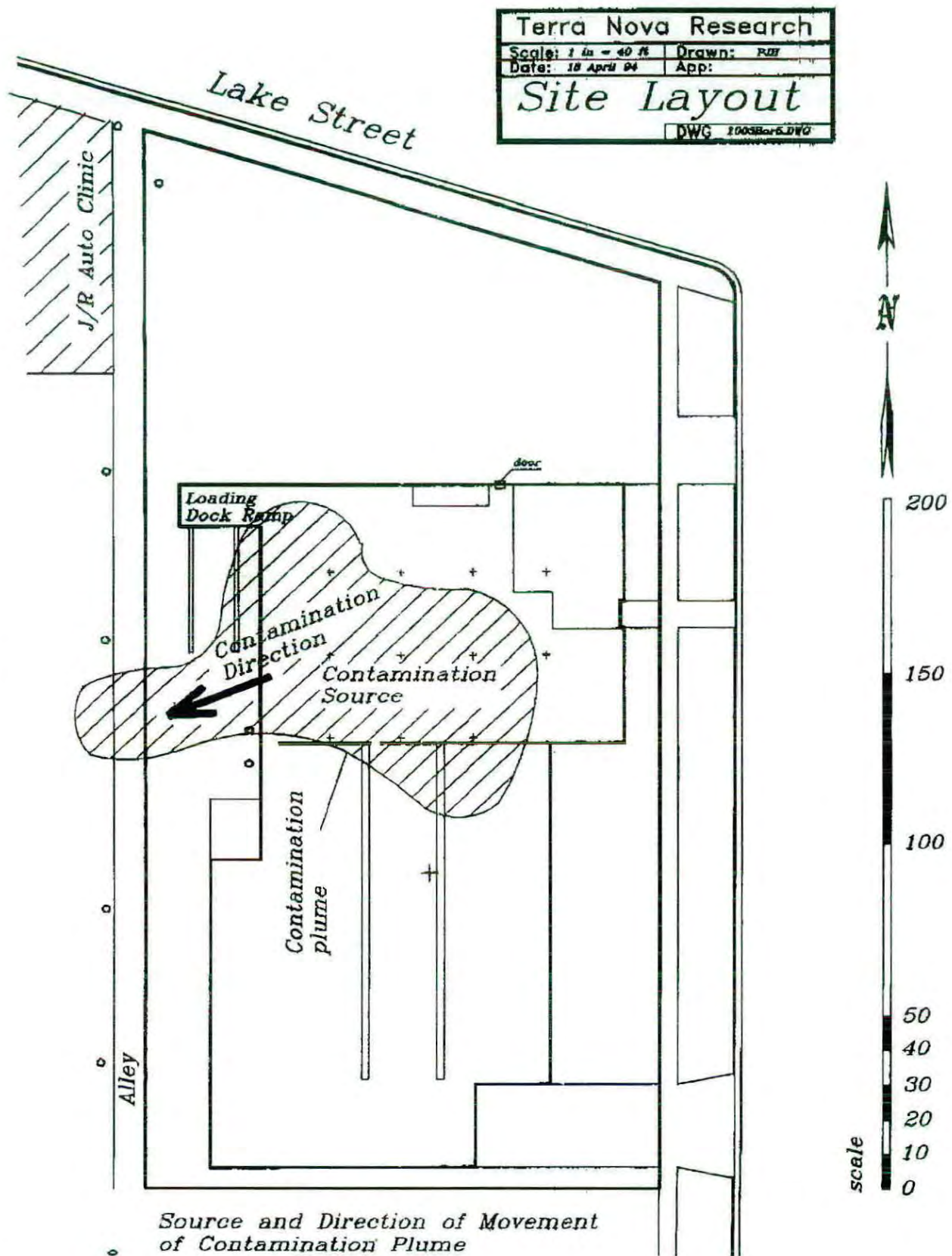




R000084



R000085



Source and Direction of Movement of Contamination Plume

C-658 -M-7

ELUC Review

Review Notes
0311835009
Chem-Plate Industries

1. The above-referenced facility is undergoing RCRA closure of a former hazardous waste container storage area (Log No. C-658 and associated modifications). The last IEPA approval letter for this project is January 18, 2002. Important aspects of this letter are as follows:
 - a. An engineered barrier is being used to address the soil contamination at this site. The boundaries of the contaminated soil and thus the required boundaries of the engineered are shown in Attachment I to this letter. Plans for the engineered barrier are to be submitted to Illinois EPA for review and approval.
 - b. It will be necessary to establish an institutional control at this facility to require that the engineered barrier be maintained in the future and that exposure to the soils underlying it is restricted. This institutional control must be developed in accordance with 35 IAC 742, Subpart J and also clearly include the following information and restrictions:
 - (1) A statement that contaminated soil is present at the site, but does not pose a threat to human health or the environment, provided an engineered barrier remains over it and the restrictions set forth in the institutional control are met;
 - (2) A scaled drawing showing the boundaries of the required engineered barrier;
 - (3) A description of the construction details of the required engineered barrier;
 - (4) A requirement that the engineered barrier be properly maintained in the future;
 - (5) A requirement that a site safety plan meeting the requirements of 49 CFR be developed and implemented any time construction/excavation efforts take place in the contaminated soil present beneath the engineered barrier. Among other things, this plan must properly restrict worker exposure and other person's exposure to the contaminated soil;
 - (6) A requirement that any soil removed from beneath the engineered barrier be managed as a waste in accordance with 35 IAC, Subtitle G: Waste Disposal.

A proposed institutional control is supposed to be submitted to Illinois EPA for review and approval prior to being recorded.
 - c. A plan to address soil contamination in the vicinity of Boring B-13 must be submitted for review and approval.

2. On February 16, 2004, Illinois EPA received a draft ELUC for the Chem Plate facility. A review of this submittal is documented in chem. plate notes

Exhibit I of this review package.

- a. *The draft ELUC is provided at the end of these notes*
- b. *The deficiencies in the draft document were faxed to Chris Nowotarski on 2/4/04*

Review of Original Draft ELUC

**Comments on the Draft ELUC for the Chem Plate Facility
and the Overall RCRA Closure Efforts at this Facility**

The Chem Plate facility located at 30 North 8th Avenue in Maywood, Illinois is undergoing RCRA closure of a former hazardous waste container storage area. Illinois EPA has approved a plan for this effort and last approved a modification request for the plan on January 18, 2002. In that letter, Illinois EPA determined that no further action was necessary for the contamination on this property, provided that an engineered barrier and associated institutional control meeting the requirements of 35 Ill. Adm. Code 742 was established to restrict exposure to this contamination. A draft ELUC was submitted to Illinois EPA on January 16, 2004 and the following deficiencies are noted in its contents:

1. A legal description of the property in question was not provided in the draft ELUC.
2. The PIN for the property in question should be placed on Exhibits A and B in place of PIN XX-XX-XXX-XXX-XXXX on the model ELUC.
3. The first word of the seventh line of the second paragraph of the ELUC should be "contaminated", not "contained".
4. Section Three of the draft ELUC must also include the following:
 - a. A description of the construction details of the required engineered barrier based over the contaminated soil;
 - b. A requirement that the engineered barrier in place over the contaminated soil of concern properly maintained in a future;
 - c. A requirement that a site safety plan meeting the requirements of 29 CFR be developed and implemented any time construction/excavation work takes place in the contaminated soil present beneath the engineered barrier. Among other things, this plan must properly restrict worker exposure and any other person's exposure to the contaminated soil;
 - d. A requirement that any soil removed from beneath the engineered barrier be managed in accordance with 35 Ill. Adm. Code, Subtitle G: Waste Disposal.
5. 35 Ill. Adm. Code 742.1010(d)(8) requires that an ELUC contain scaled maps which show information about the facility, any remaining contamination at the facility and any physical features at the facility to which the ELUC applies. Comments on the scaled drawings provided as Exhibit B are as follows:
 - a. The required scaled site maps must specifically show:
 - (1) the legal boundary of the property to which the ELUC applies (the legal boundaries of the property in question are not shown in Exhibit B);
 - (2) The horizontal and vertical extent of contaminants of concern above applicable remediation objectives for soil and groundwater to which the ELUC applies

(This information is not clearly shown in Exhibit B as: (1) there is a cross-hatched area shown which appears to identify the horizontal extent of contamination but it is not defined as such; and (2) there are several cross sections which appear to attempt to show the vertical extent of contamination but there are several sample locations shown in the cross-sections that are not shown in the plan view of the property and there are several numbers which appear to be concentrations but again they are not defined.;

- (3) The engineered barrier to which it applies (the boundaries of the required engineered barrier are not shown in Exhibit B); and
 - (4) The nature, location of the source, and direction of movement of the contaminants of concern (The nature of the contamination, especially the contaminants of concern and their concentration within the area being covered by the engineered barrier is not identified in Exhibit B. In addition, the location of the source of the contamination is not identified in Exhibit B).
- b. Exhibit B of the model ELUC developed by Illinois EPA is comprised of the maps necessary to meet the requirements of 35 Ill. Adm. Code 742.1010(d)(8). In developing such an exhibit for an ELUC associated with an engineered barrier:
- (1) If only one drawing is used to present all the required information, then it must be clearly labeled as Exhibit B to the ELUC in question. Many times however, it will be necessary to include more than one drawing in Exhibit B to meet the requirements of the requirements of 35 Ill. Adm. Code 742.1010(d)(8). In such cases, each map shall be given a unique Exhibit number (i.e., Exhibit B-1, B-2, B-3, etc.) and labeled as such.
 - (2) A cover sheet must be provided for the exhibit which: (a) lists the types of scaled maps that must be provided in the ELUC as required in 35 Ill. Adm. Code 1010(d)(8); (b) identifies the map within the exhibit which addresses the individual requirements of 35 Ill. Adm. Code 742.1010(d)(8)(A), (B), (C) and (D); and (c) lists the maps which comprise the exhibit by name and number.
 - (3) The Real Estate Tax Index/Parcel Index Number (PIN) of the property in question must be contained on each map in Exhibit B.

Finally, it must be noted that No information was provided regarding the procedures which were being followed to address the contamination in the vicinity of Boring B-13 (see Condition 4 of Illinois EPA's January 18, 2002 letter) and the off-site contamination to the west of the Chem Plate facility (it is understood that a separate ELUC is being or has been established for this contamination; however, Chem Plate should point this out). Also, there are requirements that the ELUC be filed and a final certification of closure be submitted to Illinois EPA—see Illinois EPA's January 18, 2002 letter for all requirements which must be met to complete closure of the former hazardous waste storage area at this facility.

chem plate—ELUC reqts

Checklist for Reviewing ELUCs Corrective Action Unit

Facility Name: 0311835009

Log No. of Project: _____

Reviewer: _____ Date: _____

*The ELUC reviewed herein was submitted by Christopher T. Nowotarski.
The model ELUC developed by IEPA was used as a foundation in
developing the ELUC submitted by Mr. Nowotarski.*

This document has been developed to aid in the evaluation of ELUCs reviewed by the Corrective Action Unit. The requirements of the contents of an ELUC, as set forth in 35 Ill. Adm. Code 742.1010(d), are identified in Items 1 through 10 below. The reviewer should summarize the information contained in the proposed ELUC relative to each item and then indicate whether that information is adequate. At the end of this document, the reviewer should make a final recommendation indicating whether the ELUC should be accepted or not. This recommendation should also identify: (1) any conditions/modifications necessary to make the ELUC acceptable; or (2) a detailed description of all deficiencies in the ELUC, if it is not acceptable.

OK

1. Name of property owners and declaration of property ownership;

1st paragraph → Rentabilite, LLC is property owner

2. Identification of the property to which the ELUC applies by common address, legal description, and Real Estate Tax Index/Parcel Index Number;

Exhibit A identifies facility by common address; so does 1st paragraph

No legal description provided

PIN → on Exhibit A ⇒ 15-11-132-⁰¹⁵₀₁₆⁰³³

*PIN line on Exhibit A+B needs to be properly filled out, not just
XX-XX-XX - XXX-XXXX*

OK

3. A reference to the Bureau of Land LPC numbers or the 10-digit identification numbers under which the remediation was conducted;

Site No. 0311835009

4. A statement of the reason for the land use limitation or requirement relative to protecting human health and the surrounding environment from soil, groundwater, and/or other environmental contamination;

*→ in 2nd paragraph ⇒ necessary to protect against exposure to
contaminated soil or groundwater or both, that may be
present on the property as a result of metal finishing
operations*

"containe"

*first word in 7th line of 2nd paragraph should be
"contaminated" not "contained"*

*need to note
these deficiencies
but easily
corrected*

ELUC Review
Log No.
Page 2

5. The language instituting such limitations or requirements;

→ in Section 3

need to point
this deficiency
out
→ easy to
correct

"... gw under the Property shall not be used as a potable supply of water, and any contaminated gw or soil that is removed, excavated, or disturbed from the property described in Exhibit A herein must be handled in accordance with all applicable laws & regs

→ need to include restrictions on maintaining engineered barriers
+ restricting exposure to soil

6. A statement that the limitations or requirements apply to the current owners, occupants, and all heirs, successors, assign, and lessees;

OK

see Section 4

OK
see

A statement that the limitations or requirements apply in perpetuity or until:

- The Agency issues a no further remediation determination approving modification or removal of the limitations or requirements; and
- A release or modification of the land use limitation is filed on the chain of title for the property that is the subject of the ELUC;

see Section 4

8. Scaled site maps showing:

- The legal boundary of the property to which the ELUC applies;

Exhibit B is a site layout map

→ however, legal boundary of the property
not identified

ELUC Review
Log No.
Page 3

- b. The horizontal and vertical extent of contaminants of concern above applicable remediation objectives for soil and groundwater to which the ELUC applies;
→ horizontal extent not clearly identified
⇒ there are some X-hatched
- c. Any physical features to which an ELUC applies (e.g. engineered barriers, monitoring wells, caps); and
boundaries of required engineered barrier not shown any where
- d. The nature, location of the source, and direction of movement of contaminants of concern;
→ location of source of contamination not shown
→ nature of contamination not identified ⇒ need identify contaminants or their concentrations
9. A statement that any information regarding the remediation performed on the property for which the ELUC is necessary may be obtained from the Agency through a request un the Freedom of Information Act [5 ILCS 140] and rules promulgated thereunder; and
10. The dated, notarized signatures of the property owners or authorized agent.

JKM:mls\01191s.doc

C-658-M-7

Information Submitted by Facility

3/25/04 Revised ELUC

R000095

LAW OFFICES
STONE, POGRUND & KOREY

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221 NORTH LASALLE STREET
CHICAGO, ILLINOIS 60601
TELEPHONE: (312) 782-3636
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MARTIN S. KOREY
JAMES P. ZIEGLER
DAVID B. POGRUND
CHRISTOPHER T. NOWOTARSKI, P.C.
LAWRENCE J. STARK
CARTER A. KOREY
DEAN J. LURIE

WRITER'S E-MAIL:
dlurie@spklaw.com

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To: Jim Moore
IEPA (217) 524-3291

From: Dean J. Lurie

Re: ELUC for 30 North 8th Avenue, Maywood, Illinois

Date: March 25, 2004

Number of Pages: 9 Including Transmittal Form

Message:

Attached please find the revised ELUC agreement regarding the above referenced property. I believe that all of your comments have been complied with. Please advise if the ELUC is acceptable.

Please call 312-782-3636 if there is a problem with this transmission.

PREPARED BY:

Name: Christopher T. Nowotarski
Address Stone, Pogrund & Korey
221 N. LaSalle Street, #3200
Chicago, Illinois 60601

RETURN TO:

Name: Christopher T. Nowotarski
Address Stone, Pogrund & Korey
221 N. LaSalle Street, #3200
Chicago, Illinois 60601

THE ABOVE SPACE FOR RECORDER'S OFFICE**Environmental Land Use Control**

THIS ENVIRONMENTAL LAND USE CONTROL ("ELUC"), is made this _____ day of _____, 200__, by Rentabilite, L.L.C., ("Property Owner") and Chem-Plate Industries, Inc. ("Property Occupant") of the real property located at the common address 30 North 8th Avenue, Maywood, Illinois ("Property").

WHEREAS, 415 ILCS 5/58.17 and 35 Ill. Adm. Code 742 provide for the use of an ELUC as an institutional control in order to impose land use limitations requirements related to environmental contamination so that persons conducting remediation can obtain a No Further remediation determination from the Illinois Environmental Protection Agency ("IEPA"). The reason for an ELUC is to ensure protection of human health and the environment. The limitations and requirements contained herein are necessary in order to protect against exposure to contaminated soil or groundwater or both, that may be present on the property as a result of metal finishing activities. Under 35 Ill. Adm. code 742, the use or risk-based, site-specific remediation objectives may require that use of an ELUC on real property, and the ELUC may apply to certain physical features (e.g. engineered barriers, monitoring wells, caps, etc.).

WHEREAS, Chem-Plate Industries, Inc. intends to request risk-based, site specific soil and groundwater remediation objectives from IEPA under 35 Ill. Adm. Code 742 to obtain risk-based closure of the site, identified by Bureau of Land LPC: 0311835009, utilizing an ELUC.

NOW, THEREFORE, the recitals set forth above are incorporated by reference as if fully set forth herein, and the Property Owner & Property Occupant agree as follows:

Section One. Property Owner does hereby establish an ELUC on the real estate, situated in the County of Cook, State of Illinois and further described in Exhibit A attached hereto and incorporated herein by reference (the "Property").

Attached as Exhibit B are site maps that show the legal boundary of the Property, any physical features to which the ELUC applies, the horizontal and vertical extent of the contaminants of concern above the applicable remediation objectives for soil or groundwater or both, and the nature, location of the source, and direction of movement of the contaminants of concern, as required under 35 Ill. Adm. Code 742.

Section Two. Property Owner represents and warrants it is the current owner of the Property and has the authority to record this ELUC on the chain of title for the Property with the Office of the Recorder in Cook County, Illinois.

Section Three. The Property Owner hereby agrees, for itself, and its officers, directors, employees, grantees, successors, assigns, transferees and any other owner, occupant, lessee, possessor or user of the Property or the holder of any portion thereof or interest therein, that (a) Contaminated soil is present at the site, but does not pose a threat to human health or the environment, provided an engineered barrier remains over it and the restrictions set forth in the institutional control are met; (b) A scaled drawing showing the boundaries of the required engineered barrier placed over the contaminated soil, relative to the property boundaries at the site is provided as Exhibit B to this ELUC; (c) The engineered barrier in place over the contaminated soil of concern properly must be maintained in the future; (d) A site safety plan meeting the requirements of 29 CFR must be developed and implemented any time construction/excavation work takes place in the contaminated soil present beneath the engineered barrier. Among other things, this plan must properly restrict worker exposure and any other person's exposure to the contaminated soil; and (e) Any soil removed from beneath the engineered barrier must be managed in accordance with 35 Ill. Adm. Code, Subtitle G: Waste Disposal.

Section Four. This ELUC is binding on the Property Owner, for itself, its officers, directors, employees, grantees, successors, assigns, transferees and any other owner, occupant, lessee, possessor or user of the Property or the holder of any portion thereof or interest therein. This ELUC shall apply in perpetuity against the Property and shall not be released until the IEPA determines there is no longer a need for this ELUC as an institutional control; until the IEPA, upon written request, issues a new no further remediation determination approving modification or removal of the limitation(s) or requirement(s); and until a release or modification of the land use limitation or requirement is filed on the chain of title for the Property.

Section Five. Information regarding the remediation performed on the Property may be obtained from the IEPA through a request under the Freedom of Information Act (5 ELCS 140) and rules promulgated thereunder by providing the IEPA with the LPC 0311835009 listed above.

Section Six. The effective date of this ELUC shall be the date that it is officially recorded in the chain of title for the Property to which the ELUC applies.

WITNESS the following signatures:

Property Owner(s)

Rentabilite, L.L.C.

By: _____

Its: _____

Date: _____

R000099

STATE OF ILLINOIS)
) SS:
COUNTY OF)

I, _____ the undersigned, a Notary Public for said County and State, **DO**
HEREBY CERTIFY, that _____ and _____, personally known to me to be
the Operating Manager of the Property Owner(s) of _____, and personally known
to me to be the same person whose name is subscribed to the foregoing instrument, appeared
before me this day in person and severally acknowledged that in said capacities they signed and
delivered the said instrument as their free and voluntary act for the uses and purposes therein set
forth.

Given under my hand and official seal, this ____ day of _____, 20__.

Notary Public

**PIN NO. 15-11-132-015, 016 & 033
(Parcel Index Number)**

Exhibit A

The subject property is located in the City of Maywood, Illinois County, State of Illinois, commonly known as 30 North 8th Avenue, Maywood, Illinois and more particularly described as:

Legal Description: Lots 29 and 39 both inclusive in Block 198 in Maywood a Subdivision in Section 2, 11, and 14, Township 39 North, Range 12 East of the Third Principal Meridian, in Cook County, Illinois.

PIN NO. 15-11-132-015, 016 & 033

Exhibit B

- A) Types of maps required by 35 IAC 742.1010(d)(8) are:
- a) The legal boundary of the property to which the ELUC applies;
 - b) The horizontal and vertical extent of contaminants of concern above applicable remediation objectives for soil and groundwater to which the ELUC applies;
 - c) Any physical features to which an ELUC applies (e.g., engineered barriers, monitoring wells, caps); and
 - d) The nature, location of the source, and direction of movement of the contaminants of concern;
- B) The table below indicates which maps in Exhibit B address the specific requirements of 35 IAC 742.1010(d)(8)

Requirement in 35 IAC 742.1010(d)(8)	Addressed by Exhibit B-1 Contamination	Addressed by Exhibit B-2 Engineered Barriers
a	Yes	Yes
b	Yes	No
c	No	Yes
d	Yes	No

- C) The following maps are included in Exhibit B:

Exhibit B-1 Contamination

Exhibit B-2 Engineered Barriers

Note: The interior engineered barrier is a portland cement concrete floor with a minimum thickness of six inches.
The exterior engineered barrier is asphaltic concrete pavement with a minimum thickness of three inches.

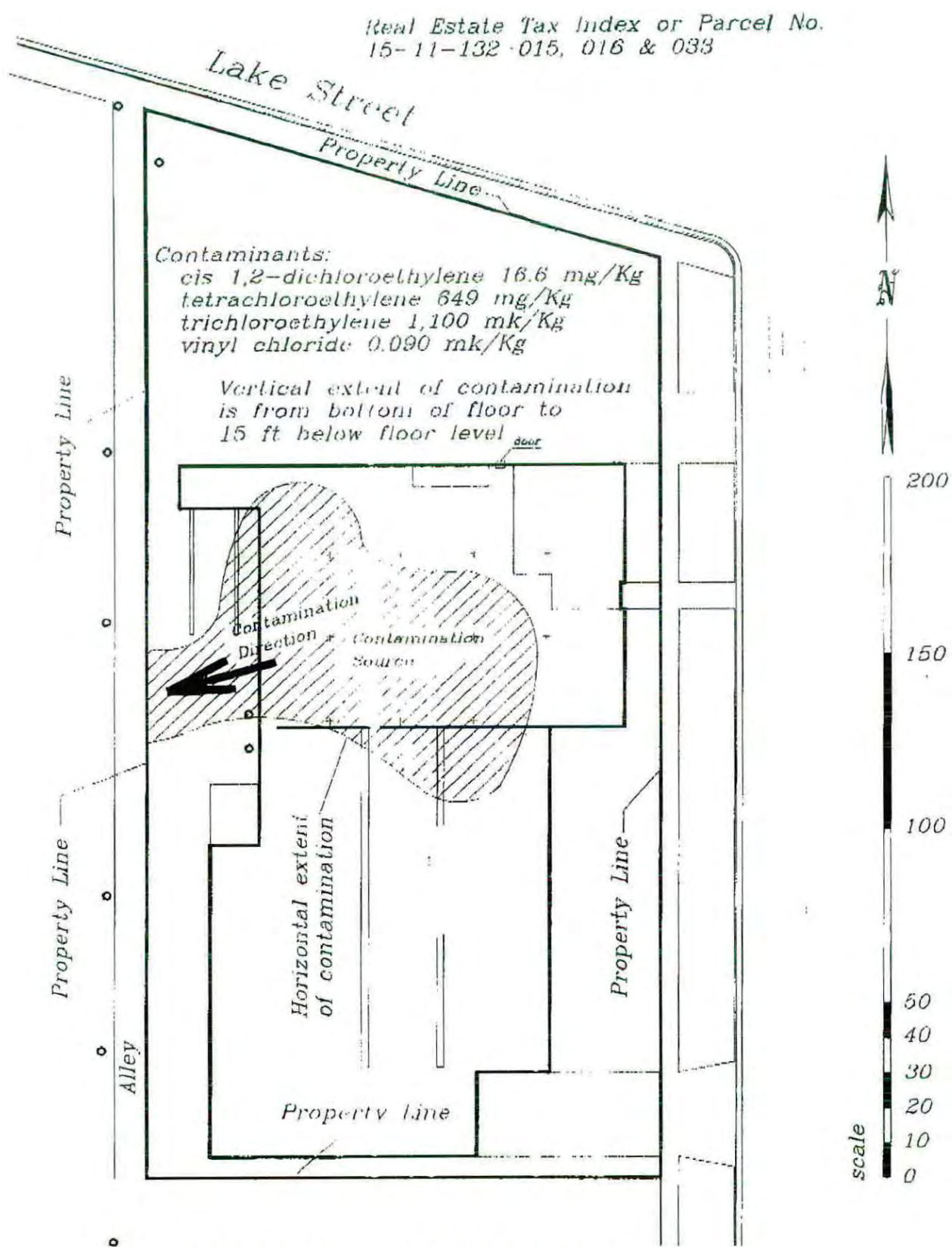


Exhibit B 1 Contamination

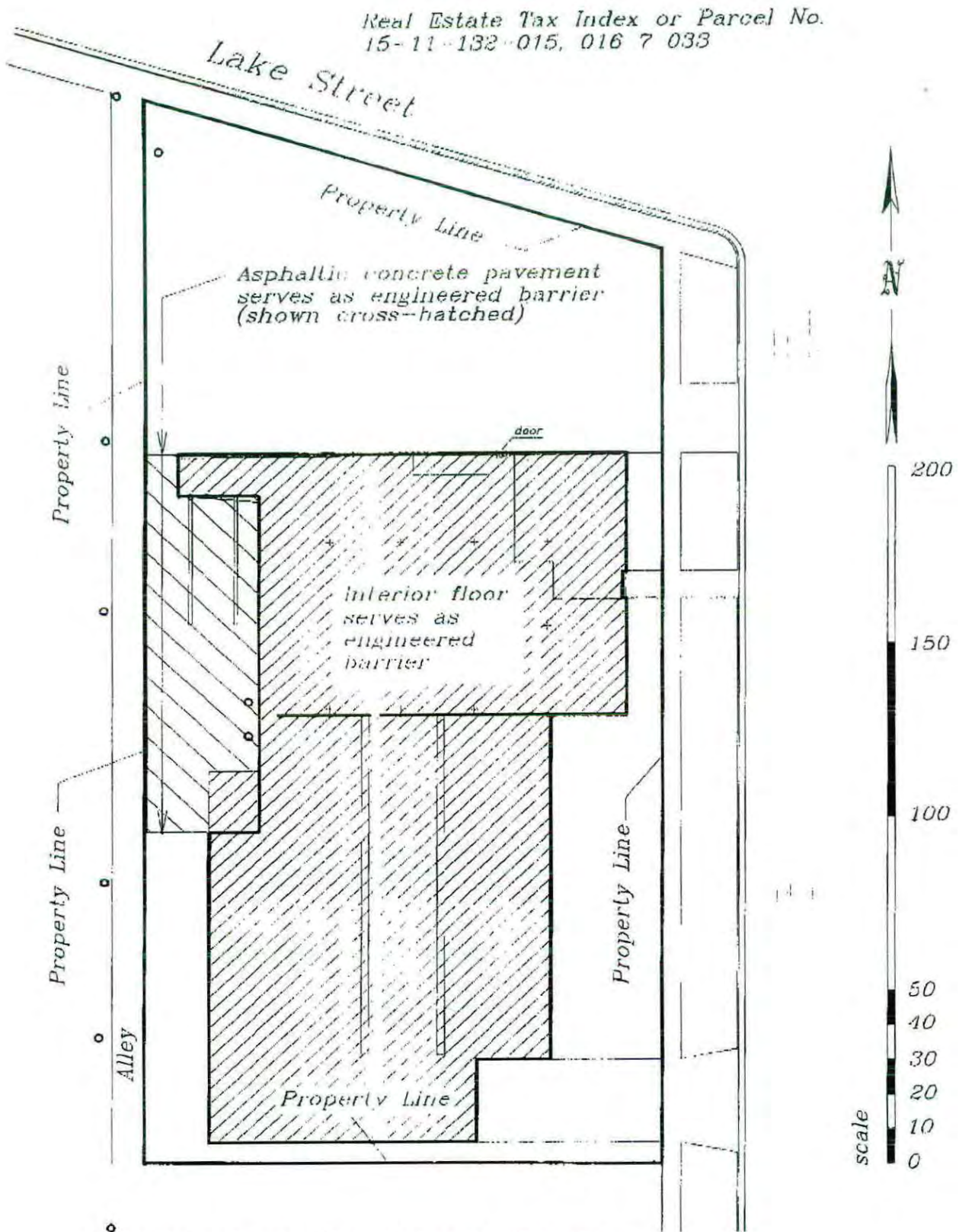


Exhibit B-2 Engineered Barriers

REVIEW NOTES

INTRODUCTION

Site: Chem-Plate Industries
Maywood, Cook County
State ID #0311835009
Fed. ID #ILD000665372
Log No. C-658-M-7

Contact: Adam Straus Christopher Nowotarski Peter Jay Huck
Chem-Plate Stone, Pogrund & Korey Terra Nova Research
708/640-1600 312/782-3636 ~~630/772-2456~~
630/717-0633

Project: RCRA Closure of a Container Storage Area

Document: Mr. Christopher Nowotarski of Stone, Pogrund & Korey submitted a draft Environmental Land Use Control (ELUC) for the facility on December 11, 2003 and was received at the Agency on December 19, 2003. Revisions to this ELUC were submitted on January 16, 2004 and March 25, 2004.

EXECUTIVE SUMMARY

The present submittal contains a proposed ELUC for the Chem-Plate facility to maintain an engineered barrier over the contaminated soil. The proposed ELUC is approved subject to certain conditions and modifications. Chem-Plate must now submit a plan to properly address the soil contamination at Boring B-13 (located in an alley to the west of the facility. An ELUC for the neighboring Megenbier Property (located to the west of Chem-Plate facility) to address soil contamination using an engineered barrier has already been established. After the contamination at Boring B-13 has been addressed, Chem-Plate can submit a final certification/documentation for the subject container storage area.

BACKGROUND

Description of the Facility

Chem-Plate Industries is an electroplater which utilize nickel, copper, zinc, cadmium, and chrome in their cyanide bearing processes. The facility is located in Section 2, Township 39 North, Range 12 East of the third Principal Meridian in Cook County, Illinois. A topographic map showing the location of the facility is included as Figure 1. Perchloroethylene is used at the facility to degrease the items to be plated.

Review Notes

C-658-M-7

Page 2

Description of the Hazardous Waste Management Unit

Chem-Plate is undergoing RCRA Closure of an indoor container storage area. The subject storage area was located in the northwest corner of the facility. The size of the storage was about 10 ft by 15 ft and it has a concrete floor. The location of the storage area is shown on Figure 2. A RCRA inspection was conducted on March 26, 1992 of the facility. During this inspection, this unit was cited for storage of seven (7) drums of perchloroethylene waste for longer than 90 days.

CHRONOLOGY OF RCRA CLOSURE ACTIVITIESIEPA's November 2, 1992 Letter (C-658)

This letter approved the closure plan for the subject container storage area. This letter required that the facility perform: (1) steam cleaning/triple rinsing of the concrete floor; (2) structural integrity inspection of the concrete floor; and (3) submit a soil sampling plan if cracks/defects are observed on the concrete floor.

IEPA's May 27, 1993 Letter (C-658-M-1)

This letter approved a February 19, 1993 closure plan modification request that contained the results of the structural integrity inspection for the concrete floor. This submittal proposed to collect soil samples along the cracks. Illinois EPA established soil cleanup objectives in this letter.

IEPA's December 28, 1993 Letter (C-658-M-2)

This letter approved a November 12, 1993 closure plan modification request that contained results of soil sampling/analysis effort. The contaminants detected above the cleanup objectives included tetrachloroethene, trichloroethene, cis-1,2-dichloroethene, and vinyl chloride. This submittal contained a proposal for additional soil investigation.

IEPA's February 27, 1995 Letter (C-658-M-3)

This letter contained IEPA's comments on a report entitled "Subsurface Exploration and Analytical Testing" that contained the results of the soil investigation. The facility installed 13 borings outside the structure and 26 borings inside the structure. This letter determined that Chem-Plate had not provided information that demonstrates that the requirements of 35 Ill. Adm. Code 725.211 and 725.214 will be met by allowing the residual soil contamination in the vicinity of the unit to remain in place. This letter identified soil sample locations that exhibited high levels of contamination. This letter required that the facility submit a soil remediation plan.

Review Notes
C-658-M-7
Page 3

June 14, 1995 Meeting

A meeting was held between the representatives of the Chem-Plate and IEPA on June 14, 1995 at the Attorney General Office in Chicago. The attendees are listed below:

<u>IEPA</u>	<u>Attorney General</u>	<u>Chem-Plate</u>
Jim Moore	Mike Mackoff	Chris Nowotarski
Munib Ahmad		Peter Jay Huck
Peter Orlinsky		
Tina Kovasznay		

The subject of the meeting was the RCRA closure of the container storage area at the Chem-Plate Industries. Based upon the discussions in the meeting, the Permit Section went to the CORE with some recommendations discussed below.

June 22, 1995 CORE Meeting

The facility proposed to remediate soil contamination using soil vacuum extraction (SVE). The permit section agreed with that proposal. The permit section recommended the following soil cleanup objectives to the CORE:

	<u>Cleanup Objective</u>
TCE and PCE	100 ug/kg
Cis-1,2-DCE	500 ug/kg

The basis for the above recommendation was that a substantial amount of clay (with very low permeability) was present between the contaminated soil and the uppermost aquifer. The CORE group approved the above recommendation.

IEPA's August 23, 1995 Letter (C-658-M-3)

This letter was issued as a follow-up to the June 14, 1995 meeting and contained the revised soil cleanup objectives. This letter also identified the area requiring remediation and required that a plan describing the remedial action to remediate the contaminated soil be submitted to IEPA for review.

IEPA's January 11, 1996 Letter (C-658-M-4)

This letter provided comments on the management of drill cuttings generated as a result of closure activities.

IEPA's October 15, 1997 Letter (C-658-M-5)

This letter approved a July 25, 1997 submittal containing a TACO evaluation. IEPA determined that closure of the subject unit could be achieved using an engineered barrier and an institutional control. This letter also required that a plan describing how the contamination detected in the vicinity of soil boring B-13 (located in an alley west of the facility) will be addressed be submitted to IEPA.

IEPA's January 18, 2002 Letter (C-658-M-6)

This letter approved a December 3, 2001 submittal that contained the results of an additional investigation conducted in the vicinity of boring B-13 and a TACO evaluation of those results. This letter determined that contamination beneath the former container storage area could be addressed using an engineered barrier and an institutional control. This letter required that: (1) a proposed institutional control for the facility be submitted to IEPA; and (2) a plan to properly address the contamination in the vicinity of Boring B-13 be submitted to IEPA for review.

ELUC FOR THE NEIGHBORING FACILITY

In a March 31, 2004 letter, IEPA determined that no further action was necessary to address the soil contamination beneath the engineered barrier at the Megenbier Property (located directly west of the Chem-Plate facility) provided: (1) an engineered barrier is properly maintained over the contaminated soil; and (2) an ELUC is maintained. ELUC for the Megenbier Property was recorded with the Cook County Recorder of Deeds on January 20, 2004 as Document Number 0402044036.

REVIEW OF THE PRESENT SUBMITTAL

Mr. Christopher Nowotarski of Stone, Pogrand & Korey submitted a proposed ELUC for the Chem-Plate facility under a December 11, 2003 submittal. Revisions to the proposed ELUC were submitted on January 16, 2004 and March 25, 2004. A detailed review of the proposed ELUC is attached.

FINAL ACTION TAKEN

The proposed ELUC is approved subject to some conditions and modifications (see the final letter). The facility must submit a plan for addressing the contamination in the vicinity of boring B-13 as required by Condition 4 of the IEPA's January 18, 2002 letter.

FIGURE 1

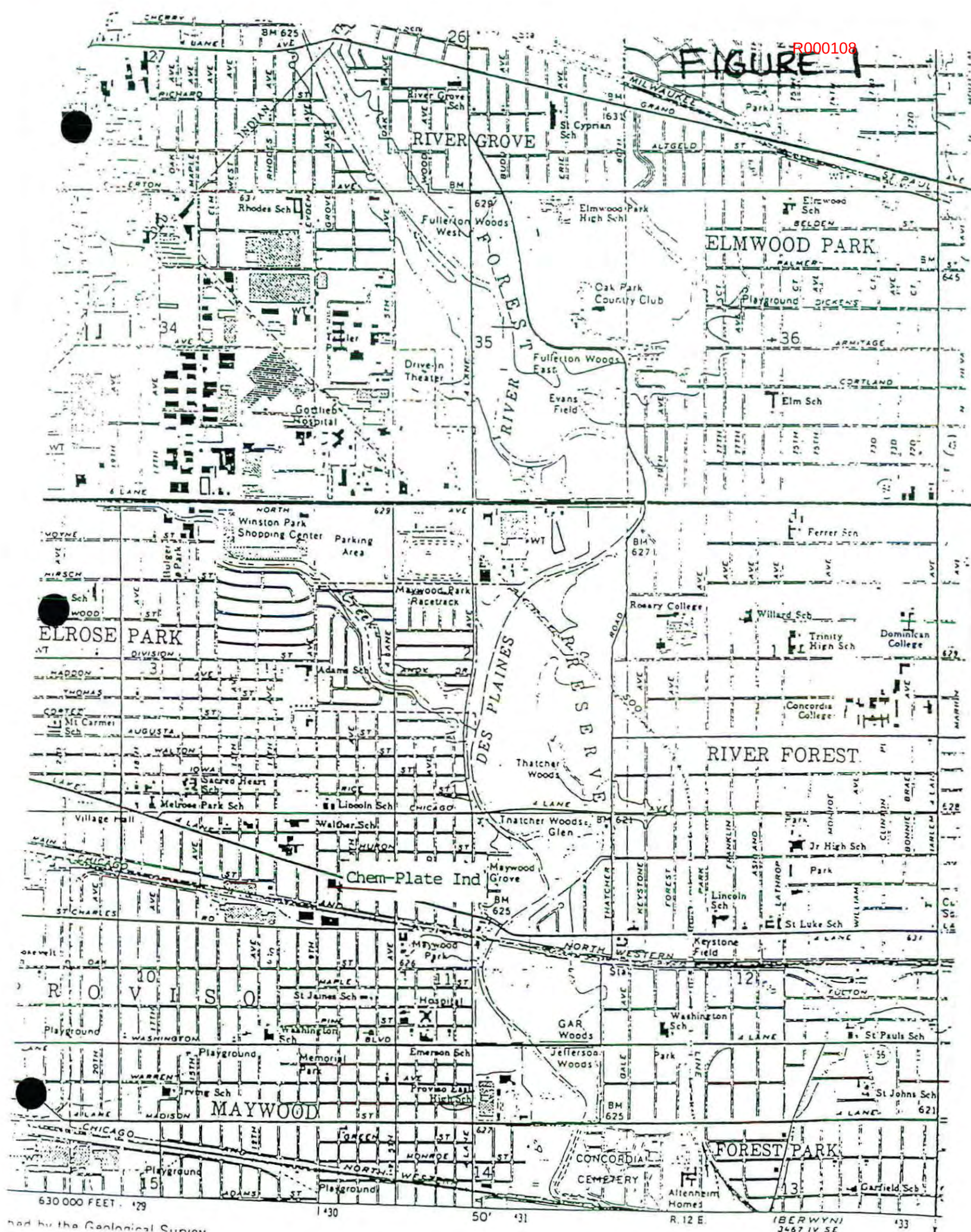
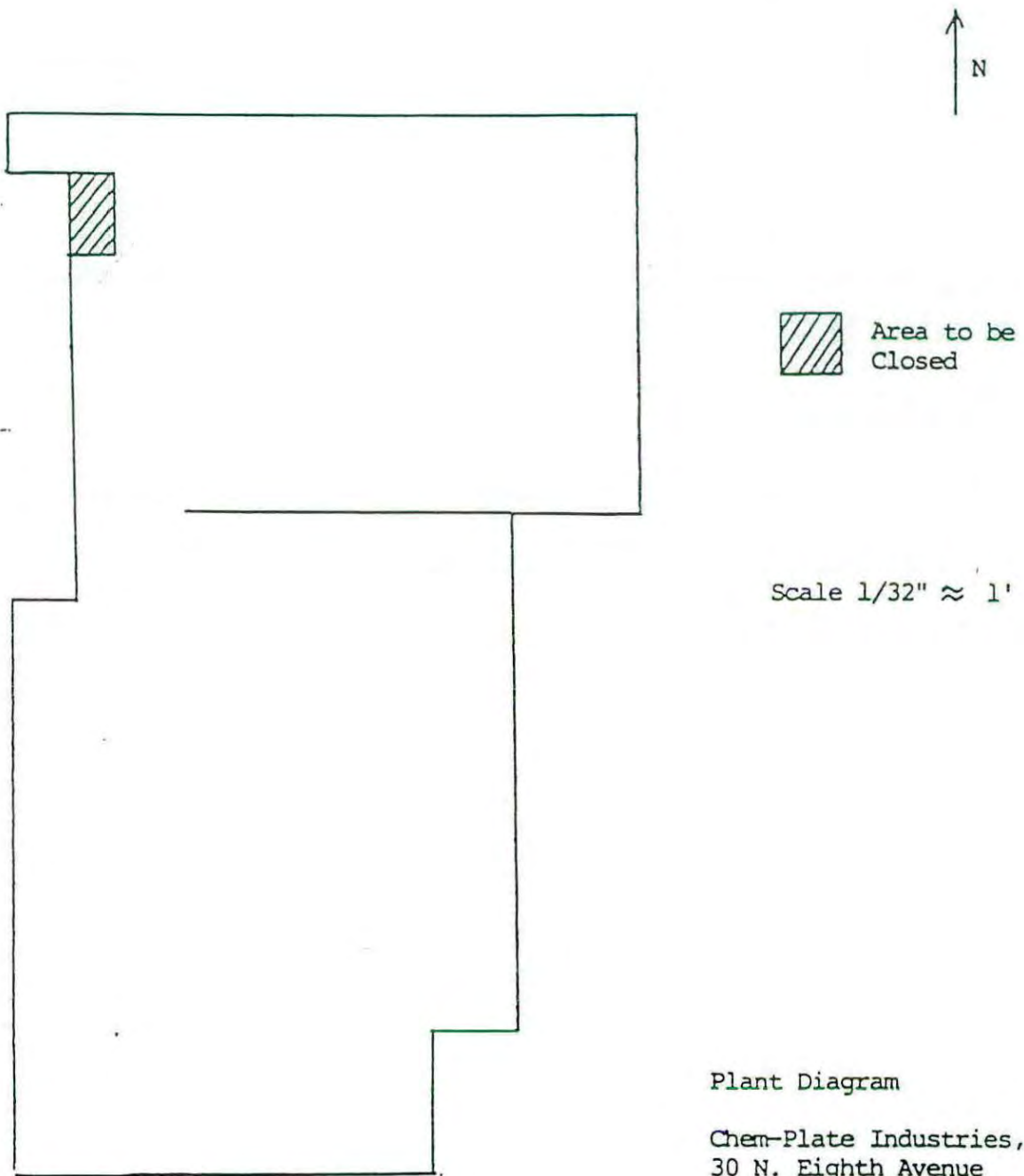


FIGURE 2



Plant Diagram

Chem-Plate Industries, Inc.
30 N. Eighth Avenue
Maywood, IL 60153

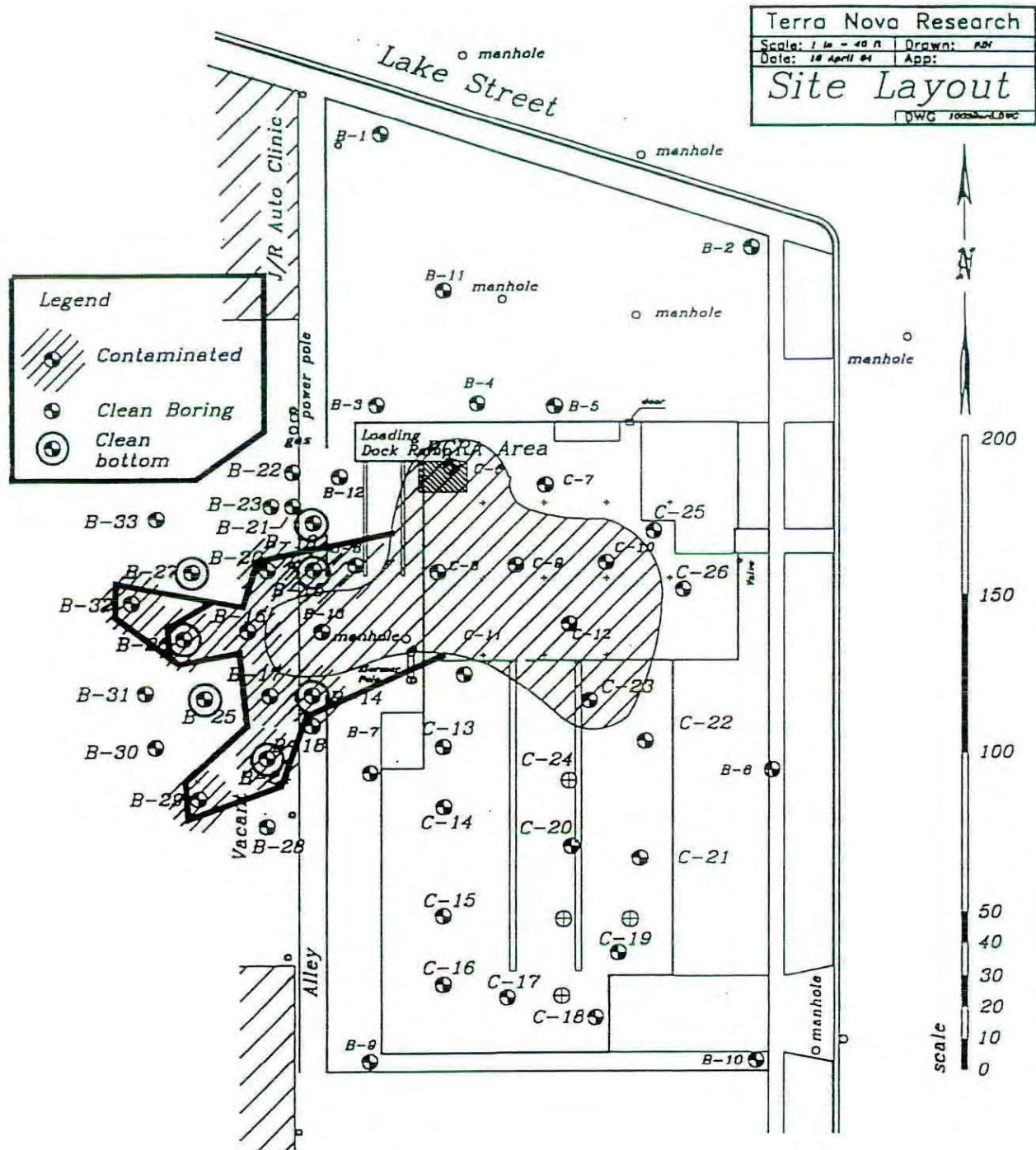


Figure 3. Site Layout, Contamination and Borings

File



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
 JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

217/524-3300

April 23, 2004

CERTIFIED MAIL

7002 3150 0000 1222 5356

Chem-Plate Industries, Inc.
 Attn: Mr. Kenneth Ramsay
 1990 East Devon
 Elk Grove Village, Illinois 60007

Re: 0311835009 -- Cook County
 Chem-Plate Industries, Inc.
 ILD000665372
 Log No. C-658-M-7
 Received: December 11, 2003; March 25, 2004
 RCRA Closure

RELEASABLE

MAY 10 2004

REVIEWER MM

Dear Mr. Ramsay:

This is in response to December 11, 2003 and March 25, 2004 submittals made on your behalf by Mr. Christopher T. Nowotarski of Stone, Pogrud & Korey, regarding the RCRA closure of a former hazardous waste container storage area (SO1) at the above-referenced facility (a drawing showing the former location of this unit is attached). Revisions to this submittal were made on January 16, 2004 and March 25, 2004.

The subject facility is located at 30 North 8th Avenue in Maywood, Illinois. A plan to complete RCRA closure of the former hazardous waste container storage area at this facility was initially approved by Illinois EPA on November 2, 1992 (Log No. C-658). Several modifications to this plan have subsequently been approved by Illinois EPA, the last on January 18, 2002. In the January 18, 2002 approval letter, Illinois EPA required: (1) a proposed institutional control meeting the requirement of 35 Ill. Adm. Code 742, Subpart J to maintain an engineered barrier be submitted to Illinois EPA (Condition 2); and (2) a plan to properly address the contamination in the vicinity of Boring B-13 (located in an alley west of the on-site building where the former hazardous waste storage area was located) be submitted to Illinois EPA (Condition 4).

Mr. Nowotarski's submittals contained a proposed Environmental Land Use Control (ELUC) for the facility as required by the Illinois EPA January 18, 2002 letter. This submittal was reviewed as a request to modify the approved closure plan for the former hazardous waste container storage area at the above-referenced facility and is hereby approved subject to the following conditions and modifications:

Mr. Kenneth Ramsay
Log No. C-658-M-7
Page 2

1. The proposed Environmental Land Use Control (ELUC) submitted March 25, 2004 for the Chem-Plate facility located at 30 North 8th Avenue in Maywood, Illinois in Cook County (PIN No. 15-11-132-015, 016 & 033) is hereby approved. The final ELUC filed with the Office of the Recorder or Registrar of Titles for Cook County must include a dated and notarized signature of the property owner.
2. The ELUC approved herein requires that an engineered barrier be maintained over the contaminated soil present in a portion of the facility; a drawing showing the boundaries of this engineered barrier is attached. This ELUC also requires that: (a) a site safety plan meeting the requirements of 29 CFR be developed and implemented any time construction/excavation efforts take place in the soil beneath the barrier; and (b) any soil removed from the barrier must be managed as a waste in accordance with 35 Ill. Adm. Code, Subtitle G: Waste Disposal. By establishing the engineered barrier and institutional control set forth in this condition, no further action will be necessary to complete closure of the subject container storage area except for compliance with the requirements set forth in this letter.
3. Within forty-five days of the date of this letter, the ELUC approved herein must be fully executed, notarized and recorded in the chain of title for the subject property in the Office of the Recorder or Registrar of Titles for Cook County. The approved ELUC will not become effective until officially recorded in the chain of custody for the subject property. A copy of this letter must also be recorded with the ELUC.
4. Within 30 days after filing the approved ELUC in accordance with Condition 3 above, a certified true copy of the filed ELUC, along with certification for the Office of the Recorder or Registrar of Titles for Cook County that the ELUC was properly filed, must be submitted to Illinois EPA.
5. Failure to comply with the limitations or requirements of an ELUC may result in voidance of an Illinois EPA no further action determination in accordance with the program under which the determination was made. The failure to comply with the limitations or requirements of an ELUC may also be grounds for an enforcement action pursuant to Title VIII of the Illinois Environmental Protection Act.
6. The limitations or requirements of the ELUC apply in perpetuity or until:
 - a. The Illinois EPA issues a new no further action determination approving modification or removal of the limitation/requirement; and

Mr. Kenneth Ramsay
Log No. C-658-M-7
Page 3

- b. A release or modification of the land use limitation is filed on the chain of title for the property that is the subject of the ELUC.
- 7. At no time shall this site be used in a manner inconsistent with the land use limitations established in the approved ELUC, unless: (1) attainment of objectives appropriate for the new land use is achieved, and (2) a new no further action determination is obtained from Illinois EPA and subsequently recorded in accordance with 35 Ill. Adm. Code 742.
 - a. Requests to release or modify an ELUC must be formally requested in writing from Illinois EPA as a: (1) request to amend the certification of closure; or (2) a permit modification request. Sufficient information must be provided in these requests to demonstrate that the requested change meets all the requirements of 35 Ill. Adm. Code 742.
 - b. Any final approval by Illinois EPA of a request to release or modify an ELUC must be filed with the chain of title for the subject facility.
- 8. As required by Condition 4 of Illinois EPA's January 18, 2002 letter (Log No. C-658-M-6), a plan to properly address the contamination in the vicinity of Boring B-13 must be submitted to Illinois EPA by June 1, 2004. This plan should be developed in general accordance with the procedures set forth in 35 Ill. Adm. Code 740. If an engineered barrier and associated institutional control are to be used, then the requirements of Conditions 1 through 3 of the January 18, 2002 letter must be met.
- 9. Illinois EPA approved an ELUC (recorded with the Cook County Recorder of Deeds on January 20, 2004 as Document Number 0402044036) established at the neighboring Megenbier property located to the west of the Chem-Plate facility in a March 31, 2004 letter. This letter determined that no further action was necessary to address soil on this property apparently contaminated as a result of hazardous waste management activities at the Chem-Plate provided: (1) ELUC is maintained; (2) an engineered barrier over the soil contamination is properly maintained; and (3) exposure to the soils beneath the engineered barrier is restricted.
- 10. In accordance with 35 Ill. Adm. Code 725.215, when closure is complete a certification must be submitted to Illinois EPA by the owner/operator and an independent professional engineer that the hazardous waste management units at the facility have been closed in accordance with the specifications in the approved closure plan. This certification should be received at the Illinois EPA within sixty (60) days after closure.

Mr. Kenneth Ramsay
Log No. C-658-M-7
Page 4

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity.

The Professional Engineering Practice Act (225 Illinois Compiled Statutes 325/1-325/49) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be licensed under that Act. Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with Paragraph 325/14 of the Professional Engineering Practice Act.

As part of the closure certification, to document the closure activities at your facility in accordance with 35 Ill. Adm. Code 725.215, a Closure Documentation Report must be developed and submitted to Illinois EPA along with the closure certification statement which includes the following:

- a. Background information about the facility overall and the overall closure project.
- b. A description of the unit(s) closed (include scaled maps showing location of unit(s) within facility and layout of unit(s), information related to construction of the unit(s), identification of wastes managed in the unit(s)).
- c. A general discussion of all completed closure activities and what was accomplished as a result of completing these activities.
- d. The volume of waste, waste residue and contaminated soil (if any) removed. The term waste includes wastes resulting from decontamination activities.
- e. Scaled drawings showing the horizontal and vertical boundaries of the extent of any soil removal effort.
- f. A description of the method of waste handling and transport.

Mr. Kenneth Ramsay
Log No. C-658-M-7
Page 5

- g. The waste manifest numbers.
- h. Copies of the waste manifests.
- i. Information documenting the results of all sampling/analysis efforts. The goal of presenting this information should be to describe, in a logical manner, the activities and results associated with the sampling/analysis effort. At a minimum, this information must include:
 - (1) identification of the reason for the sampling/analysis effort and the goals of the effort;
 - (2) a summary in tabular form of all analytical data, including all quality assurance/quality control data;
 - (3) a scaled drawing showing the horizontal location from which all soil samples were collected;
 - (4) identification of the depth and vertical interval from which each sample was collected;
 - (5) a description of the soil sampling procedures, sample preservation procedures and chain of custody procedures;
 - (6) identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical inferences;
 - (7) copies of the final laboratory report sheets, including final sheets reporting all quality assurance/quality assurance dates;
 - (8) visual classification of each soil sample in accordance with ASTM D-2488;
 - (9) a summary of all procedures used for quality assurance/quality control, including the results of these procedures; and
 - (10) a discussion of the data, as it relates to the overall goal of the sampling/analysis effort.

Mr. Kenneth Ramsay
Log No. C-658-M-7
Page 6

- j. Color photo documentation of closure. Document conditions before, during and after closure.
 - k. A chronological summary of closure activities and the cost involved.
11. The attached form entitled RCRA Interim Status Closure and Post-Closure Plans General Form (LPC-PA18) must be completed and accompany all information submitted to the Illinois EPA associated with the RCRA closure activities described in this letter. As noted on the form, one copy must accompany the original of all submittals, so that the information can be distributed to the appropriate Illinois EPA personnel, including regional offices.
12. Except as modified herein, closure of the subject unit must be carried out in accordance with: (1) 35 Ill. Adm. Code 725 and 742; and (2) the following previous closure plan approval letters for this project:
- | | |
|---------------------------------------|--------------------------------------|
| November 2, 1992 (Log No. C-658) | August 23, 1995 (Log No. C-658-M-3) |
| May 27, 1993 (Log No. C-658-M-1) | January 11, 1996 (Log No. C-658-M-4) |
| December 28, 1993 (Log No. C-658-M-2) | October 15, 1997 (Log No. C-658-M-5) |
| February 27, 1995 (Log No. C-658-M-3) | January 18, 2002 (Log No. C-658-M-6) |

This action shall constitute Illinois EPA's final action on the subject submittal. Within 35 days after the date of mailing of Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA. However, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Work required by this letter, your submittal or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This letter does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Mr. Kenneth Ramsay
Log No. C-658-M-7
Page 7

Should you have any questions regarding this matter, please contact Munib Ahmad, P.E., at 217/524-3300.

Sincerely,



Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

JLM:MA:bjh\042631s.doc
JLM

Attachments: Site Layout Map
Boundaries of Engineered Barrier
Closure Certification Statement
LPC PA-18

cc: Christopher Nowotarski - Stone, Pogrud & Korey
Peter Jay Huck - Terra Nova Research
Mike Mackoff - AGO, Chicago

bcc: Bureau File
DesPlaines Region
Jim Moore
Munib Ahmad

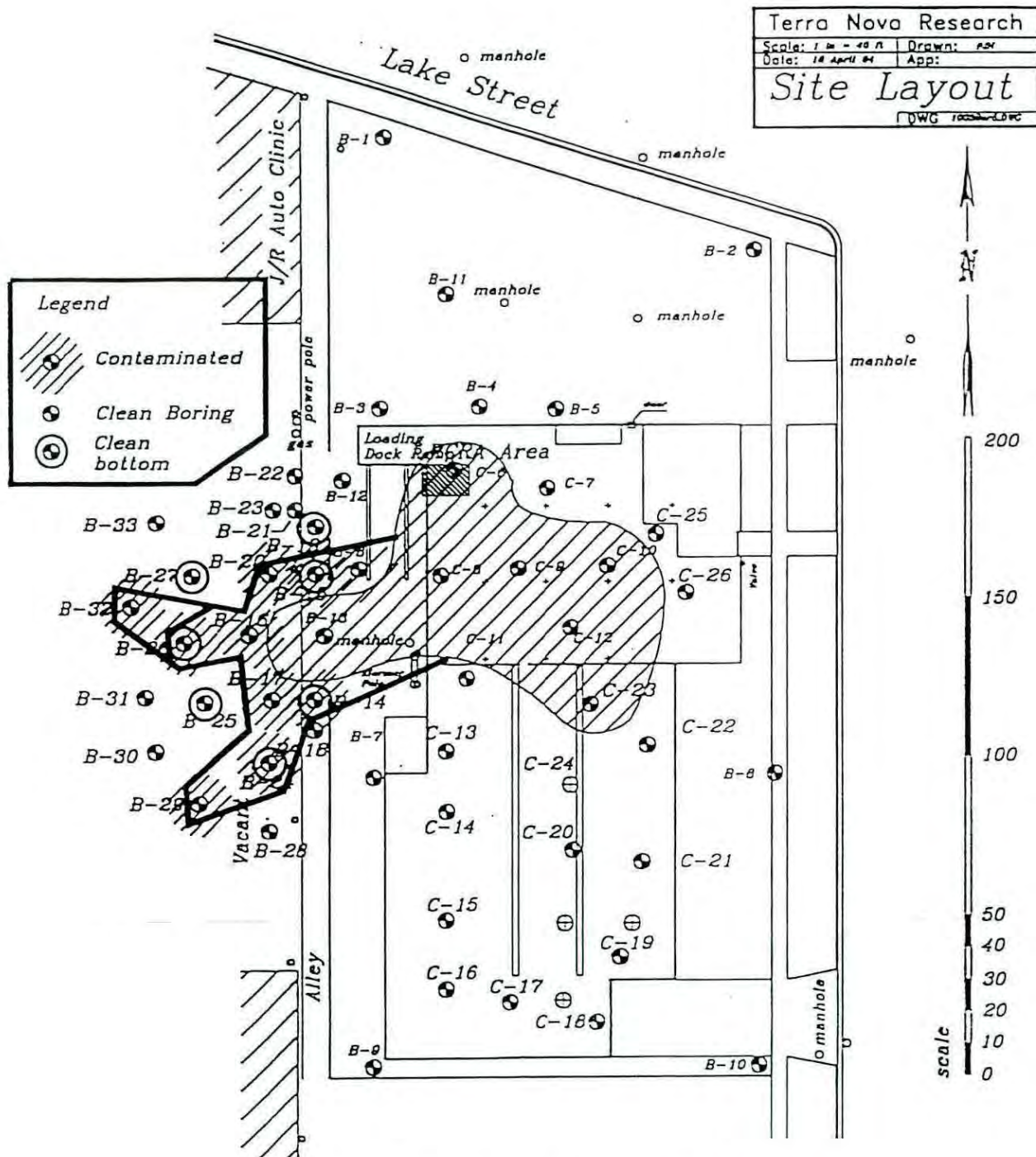


Figure 1. Site Layout, Contamination and Borings

R000119

Real Estate Tax Index or Parcel No.
15-11-132-015, 016 7 033

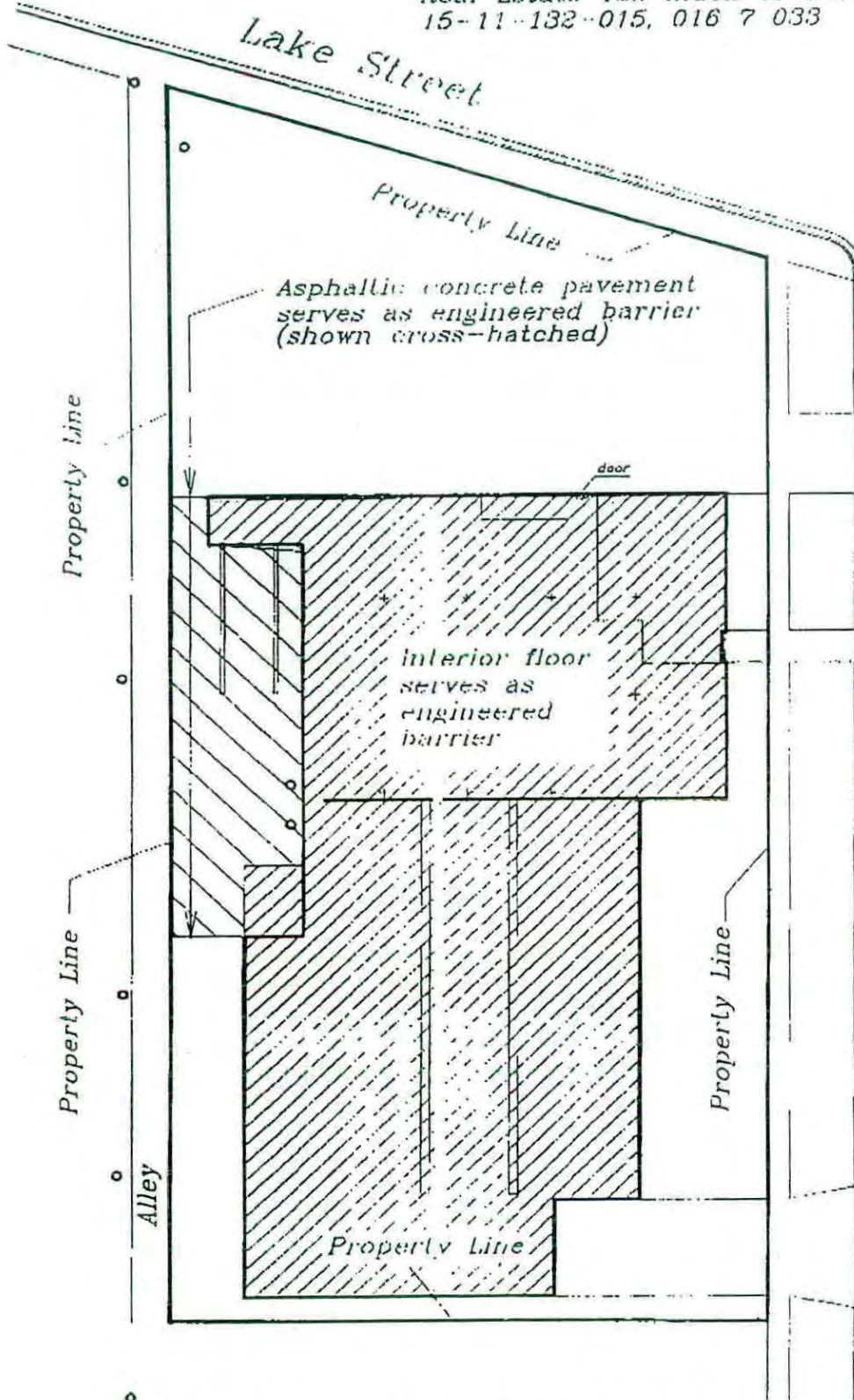


Exhibit B-2 Engineered Barriers

CLOSURE CERTIFICATION STATEMENT

Chem-Plate – Cook County

Log No. C-658

0311835009

ILD000665372

To meet the requirements of 35 Ill. Adm. Code 725.215, this statement is to be completed by both a responsible officer of the owner/operator (as defined in 35 Ill. Adm. Code 702.126) and by an independent licensed professional engineer upon completion of closure. Submit one copy of the certification with original signatures and two additional copies.

The former hazardous waste container storage area at the Chem-Plate facility has been closed in accordance with the specifications in the approved closure plan. A report documenting that closure has been carried out in accordance with the approved plan is attached.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner/Operator Date
Responsible Officer

Name and Title of Owner/Operator
Responsible Officer

Signature of Licensed P.E. Date

Name of Licensed P.E. and Illinois License
Number

Mailing Address of P.E.:

Licensed P.E.'s Seal:

Closure Tracking Sheet

4/29/2004

Log #
658-M-7

City:
MAYWOOD

County:
COOK

Comments Due:
5/29/2004

Facility:
CHEM PLATE IND INC

Notifications:
☒ FOS
☒ CMS
☐ RPMS

State ID#:
0311835009

Reviewer: GAU:
BAI

USEPA ID#:
ILD000665372

Status: Type:
P

Received
12/19/2003

Due 90:
3/18/2004

Mailed:
4/23/2004

Received 2

Mailed 2:

Due 60:

App/Rej:
APP

Cert Due:

Cert Received

Closed:

G/T Status:

Unit Closed

Clean Close

Comments:

Process:

Amount:

Unit of Measure

Add/Del:

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**ENVIRONMENT
& HEALTH**

Behzad Feda
Environmental Engineer
Illinois Environmental Protection Agency
2520 West Iles Ave
Springfield IL 62704
behzad.feda@illinois.gov

RE: 0311835009 -- Cook County
Chem-Plate Industries Inc
ILD0006653 72
Log No C-658-M-1
RCRA Closure - 24B
Permit Closure Final Action

Dear Behzad:

December 29, 2025

This letter has been prepared in response to the August 8, 2025 IEPA letter regarding the February 29, 2024 RCRA Closure Plan Addendum submitted by Ramboll Americas Engineering Solutions (Ramboll) on behalf of Chem-Plate Industries Inc. (Chem-Plate). IEPA's letter included 6 comments, which are addressed on a point-by-point basis below with the IEPA's comments in bold and Chem-Plate's response immediately following. As we discussed during our October 31, 2025 call with IEPA, due to ownership/organizational changes within Chem-Plate, many of the original documents that were submitted to IEPA, as well as IEPA's responses were not available to Chem-Plate. In response to a Freedom of Information Act request submitted on October 31, 2025, Chem-Plate was provided with much of the missing correspondence from IEPA, but very few of the report submittals from Chem-Plate. As such, our responses are based on the information that we have available.

Ramboll
333 West Wacker Drive
Suite 1050
Chicago, IL 60606
USA

T +1 312 288 3800
www.ramboll.com

A copy of the LPC-PA18 form is included in Attachment 1. Figures showing the existing soil sampling locations and the approved engineered barrier locations are included in Attachment 2. A completed site inspection form for the existing engineered barriers is included in Attachment 3.

1. **In 2013, the indoor inhalation exposure route was added to Title 35 Illinois Administrative Code (35 IAC) Part 742, Subpart C. In accordance with 35 IAC 725.211, Chem-Plate must assess the indoor inhalation exposure route. Exclusion of the indoor inhalation exposure route must be achieved before RCRA closure can be completed. A work plan for investigating soil gas must be submitted within 60 days of the date of this letter, and it must include:**
 - a. **background information about the facility;**
 - b. **the goals and objective of the sampling effort;**
 - c. **drawings showing the horizontal and vertical boundaries of the contaminant plume(s) existing at the site;**
 - d. **a list of analytes, which must include any volatile organic compound that has been detected at this site;**
 - e. **a scaled map showing the locations where samples will be collected;**

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**IEPA-BOL
PERMIT SECTION**

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- f. a description of the quality control/ quality assurance procedures that will be utilized during sampling;
- g. a description of the sampling procedures; and
- h. a description of how waste generated by sampling will be handled.

The building is currently used to store parts by a former tenant but will soon have no regular occupants. As such, there is currently only a minimal risk to the occasional worker that may enter the building to obtain parts. Given the lack of a future use of the building, there is no current realized exposure to volatile organic compounds (VOCs) that may be present in the indoor air within the building as a result of residual subsurface impacts. Rather than expend its remaining and extremely limited resources to assess and potentially mitigate vapors, Chem-Plate intends to demolish the above grade structure, leaving only the floor slab in-place. Chem-Plate will also implement an Environmental Land Use Control (ELUC) requiring the installation of a vapor mitigation system or vapor barrier for any future occupiable structures constructed within 50 feet of the identified area of contamination. As discussed in our response to Comments 2 and 4, Chem-Plate will repair deficiencies in the engineered barrier upon completion of the demolition.

2. **In previous Illinois EPA letters, the establishment of engineered barriers over contaminated soil was approved and deemed sufficient to exclude certain exposure routes under 35 IAC Part 742. However, that determination was made with the assumption that the engineered barriers would be effectively maintained. Chem-Plate has not maintained the engineered barriers and has not yet closed the hazardous waste management unit. Therefore, it is necessary to assess the current conditions of contaminated soils beneath the barriers to meet the requirements of 35 IAC Part 742 before certifying closure. In addition, Illinois EPA does not consider engineered barriers sufficient to exclude the soil component of the groundwater ingestion exposure route. Within 60 days of the date of this letter, submit a work plan for investigating the current conditions of any remaining contamination at the site to evaluate and to determine if further remediation is necessary in accordance with the requirements of 35 IAC Part 742.**

Chem-Plate respectfully disagrees with IEPA's request for additional investigations. As the IEPA is aware, facility operations ceased in 1995, and all relevant chemicals were removed from the building shortly thereafter. The contamination is under the interior building slab. As discussed on page 15 of the Terra Nova Research, Inc. Subsurface Exploration and Analytical Testing Report dated August 15, 1994, investigations failed to identify groundwater in any of the borings, the deepest of which extended to 25 feet below ground surface. This was corroborated by regional geological studies. See for example, the TechLaw, Inc. Preliminary Assessment/Visual Site Inspection Report (the "PA/VSI") dated April 29, 1998, which stated on page II-5 that "ISWS data indicates the shallowest well in the area had a completed depth of 72 feet below ground surface...[which was] used as the depth to groundwater." Testing of the gray clay underlying the site indicates that its permeability ranges from 9.84×10^{-9} to 1.23×10^{-8} cm/sec indicating that the clay is extremely impermeable. The highest concentrations of VOCs detected at the property are inside the northwest corner of the building where the former hazardous waste storage area was located. While there are some shallow cracks in building floor, soil has never been exposed in the building and the roof has prevented water from percolating into the soils and causing migration from the residual source material. While the exterior engineered barriers are in less-than-desirable condition, pavement is still present in the loading dock area and robust pavement is present within the alley. A 2022 RCRA inspection report by IEPA noted that the interior floor "had some cracks and chips which may need to be addressed depending on if they compromise the purpose of the barrier". The inspection noted that they alley appeared to be in good condition, but "the barrier between the alley and the building appeared to possibly need refinishing or repair." It also noted a section of gravel that did not appear to be adequate as an engineered barrier. It concluded that "some maintenance is needed for the engineered barrier outside directly west of the building." Chem-Plate notes that the "section of gravel"

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noted in the report is approximately 4 feet wide and it is unknown whether there is asphalt under it. Also, there is no indication that groundwater is used as a potable source at or in the vicinity of the site. Page II-5 of the PA/VSI states that: "drinking water supplies for the area are obtained from Lake Michigan." In addition, there is a current groundwater ordinance in place for Maywood prohibiting the installation or use of potable water supply wells in Maywood (Ordinance No. CO-99-30, accepted by IEPA on 4/26/2000, available at <https://webapps.illinois.gov/EPA/WebsiteApi/api/GroundwaterOrdinance/GetDocument?documentName=00042402.pdf>.)

Chem-Plate believes that IEPA's request for additional investigation is unnecessary for the following reasons:

- The highest concentrations of VOCs are beneath the building, which are protected from infiltration.
- Groundwater is not present within at least 25 feet of the ground surface.
- The underlying soils are extremely impermeable and, with the exception of the contamination present, would be acceptable for use as an engineered barrier.
- Chemicals have not been used or stored at the facility since approximately 1995.
- Engineered barriers have been present over most of the area with the exception of the small strip of gravel adjacent to the building under which it is unknown whether an engineered barrier exists. Chem-Plate understands that maintenance is needed and has been planning to conduct that maintenance since December 2024 when the last closure plan modification was submitted.
- There is currently a groundwater ordinance in place in Maywood.

As discussed above, it is Chem-Plate's intention to demolish the above-grade structures present at the site and establish an ELUC to address the vapor intrusion pathway. During demolition, any soils excavated in areas subject to the engineered barrier will be stockpiled on plastic within the area of concern and then replaced at the approximate same location and depth in accordance with RCRA requirements under OSWER Directive 9441.1922(16). After the demolition is complete, engineered barrier deficiencies will be addressed. Chem-Plate proposes to repair the engineered barriers after demolition because the heavy equipment and demolition processes may result in significant wear and tear on the surfaces. Thus, once the demolition debris is removed, the cracks in the concrete floor will be cleaned and sealed and the loading dock area leveled to grade and paved with a minimum of 6 inches of asphalt. Because of the weather, it will not be possible to asphalt the dock area until the spring of 2026.

In regard to IEPA's inquiry about the adjacent property during the October 31, 2025 call, Chem-Plate notes that IEPA approved an ELUC (recorded with the Cook County Recorder of Deeds on January 20, 2004 as Document Number 0402044036) that required installation and maintenance of an engineered barrier at the neighboring Megenbier property located to the west of the Chem-Plate facility in a March 31, 2004 letter. As a result, the IEPA determined no further remediation was necessary to address soil contamination on that property.

3. **Chem-Plate did not submit the Illinois EPA form titled, "RCRA Interim Status Closure and Post-Closure Care Plans General Form (LPC-PA 18)," with original signatures in accordance with the requirements of 35 IAC 702.126. The LPC-PA18 form must be completed and must accompany all information submitted to Illinois EPA associated with closure activities. As noted on the form, two copies must accompany the original of all submittals, so that the information submitted can be distributed, as necessary, to Illinois EPA personnel and regional offices. The LPC-PA18 form and guidance to complete the form can be found on Illinois EPA's website.**

Chem-Plate notes this requirement and will include the form in all future submittals. This form is attached to this letter as Attachment 1.



4. **An integrity inspection of the engineered barriers by a qualified Illinois licensed professional engineer must occur within 30 days of the date of this letter. Submit the results of the integrity inspection with the work plan described in Condition 1.**

An integrity inspection was conducted by an Illinois-licensed Professional Engineer (PE) on December 12, 2025 after receipt of the Freedom of Information Act materials from the IEPA. Attachment 3 includes a completed inspection form, signed by Illinois-licensed professional engineer. The interior inspection revealed some minor and moderate cracks in the concrete and some holes that appear to be related to concrete patch failing in old soil borings. A portion of the floor could not be observed because of the presence of pallets but will be inspected after removal of materials and demolition. The observed cracks did not appear to fully penetrate the slab, which was reported by the property owner to be approximately 6 inches thick. As discussed in our response to Comment 2, the cracks and holes will be cleaned and sealed after all of the interior materials are removed and the building demolished. Significant cracks were observed in the loading dock area and moderate cracks in the adjacent pavement. The visible portions of the alley were in good condition, with no observable cracks. After demolition, the loading dock area will be filled to match the exterior grade and covered with a 6-inch-thick asphalt cap. Because of snow cover, portions of the area could not be observed.

5. **Chem-Plate does not have a current cost estimate and financial assurance for closure activities as required by 35 IAC 725.242 and 725.243. With the work plan described in Condition I, submit a cost estimate for the activities required to complete closure of the hazardous waste container storage area. The detailed, itemized cost estimate must be based on the activities and procedures specified in the Chem-Plate's closure plan and the activities required by this letter. The estimate must be in current dollars for a third party to complete the work with 10% contingency cost. Financial assurance must be established for the approved estimated amount within 60 days of approval by Illinois EPA.**

Upon IEPA approval of Chem-Plate's approach, Chem-Plate will present a cost estimate to complete the remaining work that will include a 10% contingency.

6. **In view of the need for additional investigations, as described in this letter, the signing of the HAA with the Village of Maywood and the subsequent closure report should be postponed until Illinois EPA has determined the current conditions meet the requirements of 35 IAC Part 742. Based on the results of the investigations required by this letter, the HAA may need to be amended. Illinois EPA will inform Chem-Plate if a revised HAA is required.**

Given the presence of a robust pavement in the alley that acts as an engineered barrier and an existing Highway Authority Agreement that addresses potential exposure concerns, Chem-Plate has no concerns with not updating the Highway Authority Agreement until other matters are resolved.

Sincerely,

Ramboll Americas Engineering Solutions, Inc.

Angela DeDolph, PE
Principal

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adedolph@ramboll.com

Daniel W. Petersen, PG
Principal

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dpetersen@ramboll.com

Attachments

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**ATTACHMENT 1
LPC-PA18 FORM**



Illinois Environmental Protection Agency

Bureau of Land • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

RCRA INTERIM STATUS CLOSURE AND POST-CLOSURE CARE PLANS GENERAL FORM

LPC-PA18

This Form Must Accompany Any Rcra Interim-status Closure And/or Post-closure Care Plans Or Modification Request Submitted To The Division Of Land Pollution Control. The Original And Two Copies Of All Documents Submitted Must Be Provided.

FACILITY IDENTIFICATION (Information about the facility where the units are located which are addressed in this closure plan submittal)

Name: Chem-Plate Industries, Inc.
Street Address: 30 N. 8th Avenue
City: Maywood

County: Cook
Site # (IEPA): 0311838009
Site No. (USEPA): ILD000665372

Owner Information

Name: Chem-Plate Industries, Inc.
Mailing Address:
1800 Touhy Ave
Elk Grove Village, IL
60007
Contact Name: Aaron Straus
Contact Title: Executive Vice President
Phone #: 847-640-1600

Operator Information

Name: Chem-Plate Industries, Inc.
Mailing Address:
1800 Touhy Ave
Elk Grove Village, IL
60007
Contact Name: Aaron Straus
Contact Title: Executive Vice President
Phone #: 847-640-1600

TYPE OF SUBMISSION (check applicable item and provide requested information, as applicable)

- ☐ Original (New) Closure Plan
☐ Original (New) Post-Closure Plan
☒ Response to Disapproval letter

Log No. of Most Recent Agency Approval/Disapproval Letter C-658-M-11

Date of Most Recent Agency Approval/Disapproval Letter August 8 2025

- ☐ Modification Request
☐ Additional Information for _____ Submittal (Log No. _____ if known)
(enter date)

Does this submittal contain groundwater information?

Yes

No

No

(IF YES, PLEASE INCLUDE ONE ADDITIONAL COPY OF SUBMITTAL)

IL 532-2106
LPC 464
Rev. 06/03

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

RECEIVED

JAN 05 2026

**IEPA-BOL
PERMIT SECTION**

DESCRIPTION OF SUBMITTAL: (briefly describe what is being submitted)

Response to IEPA comments on RCRA Closure Plan Addendum dated February 29, 2024

LIST OF DOCUMENTS SUBMITTED: (identify all documents in this submittal, including the cover letter)

Response to comments letter

UNITS UNDERGOING CLOSURE (please identify what type of units are addressed in the plan, their capacities and whether they are on the RCRA Part A for the facility)

Unit	Unit Code	Number of Units Closing	Capacity	On Part A Y/N
<u>Storage:</u>				
Container (barrel, drum, etc.)	S01	1	NA	
Tank	S02			
Waste Pile	S03			
Surface Impoundment	S04			
<u>Treatment:</u>				
Tank	T01			
Surface Impoundment	T02			
Incinerator	T03			
Other (explain)	T04			
<u>Disposal:</u>				
Landfill	D80			
Land Application	D81			
Surface Impoundment	D83			

CERTIFICATION AND SIGNATURE (Must be completed for all submittals. Certification and signature requirements are set forth in 35 IAC 702.126. Any submittal involving engineering plans, specifications and calculations as defined in the Illinois Professional Engineering Practice Act (225 ILCS 325) and 68 Ill. Adm. Code 1380 must be signed and certified by an Illinois licensed professional engineer.)

All closure plans, post-closure plans and modifications must be signed by the person representing the owner/operator designated below or by a duly authorized representative of that person:

1. If the owner/operator is a Corporation - By a principal executive officer of at least the level of vice-president.
2. If the owner/operator is a Partnership or Sole Proprietorship - By a general partner or the proprietor, respectively.
3. If the owner/operator is a Government - By either a principal executive officer or a ranking elected official.

A person is a duly authorized representative only if:

1. the authorization is made in writing by a person described above; and
2. is submitted with this application (a copy of a previously submitted authorization can be used).

RECEIVED

JAN 05 2026
IEPA-BOL
PERMIT SECTION

CERTIFICATION STATEMENT - I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

Owner Signature Aaron Straus

Date 12/26/25

Title Executive Vice President

Operator Signature Aaron Straus

Date 12/26/25

Title Executive Vice President

Engineer Signature Angela E. DeDolph
(if necessary)

Date 12/29/2025

Engineer Name Angela DeDolph

Engineer Seal

Engineer Address 333 West Wacker, Suite 1050

Chicago, IL 60606

Engineer Phone # 312-288-3816

JM:bjh\97763i.doc



RECEIVED

JAN 05 2026

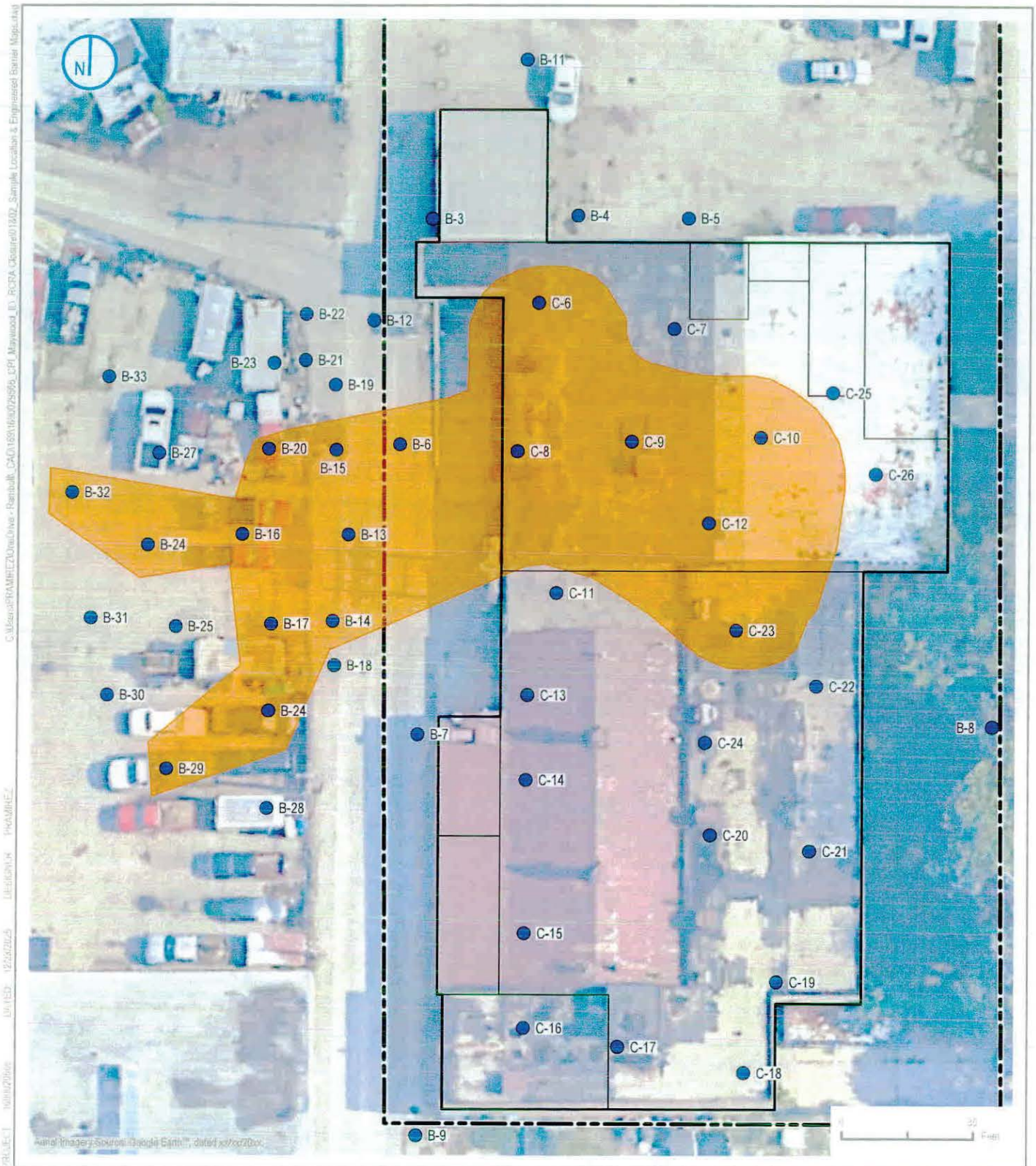
**IEPA-BOL
PERMIT SECTION**

ATTACHMENT

2

RAMBOLL

ATTACHMENT 2
FIGURES



- PROPERTY BOUNDARY (APPROXIMATE)
- CHLORINATED VOC IMPACTS

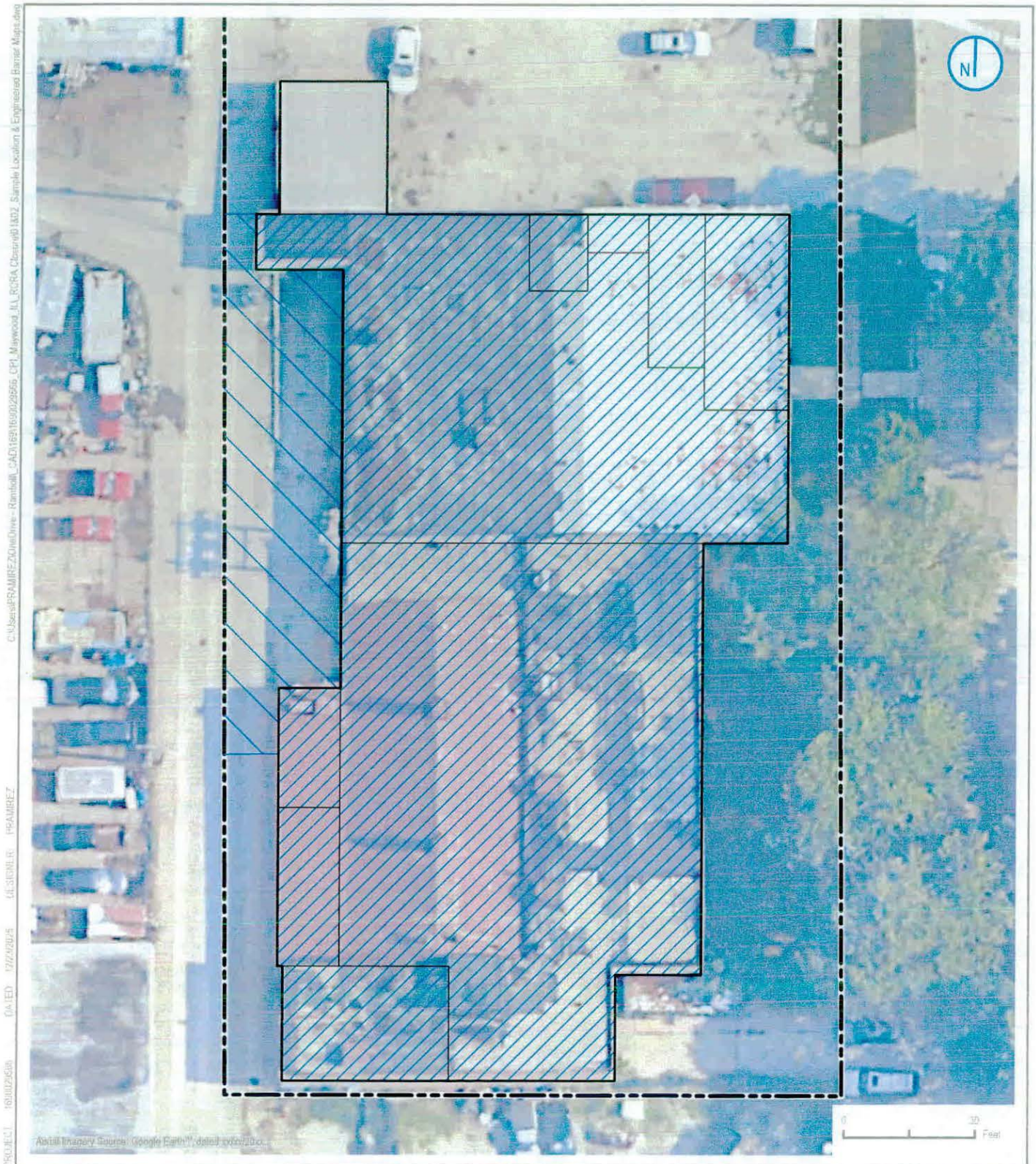
SAMPLE LOCATION MAP

FIGURE 01

CHEM-PLATE INDUSTRIES, INC. FACILITY
30 NORTH 8th AVENUE
MAYWOOD, ILLINOIS

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.
A RAMBOLL COMPANY

RAMBOLL



--- PROPERTY BOUNDARY (APPROXIMATE)

▨ INTERIOR FLOOR

▨ ASPHALT/CONCRETE PAVEMENT

ENGINEERED BARRIER MAP

FIGURE 02

CHEM-PLATE INDUSTRIES, INC. FACILITY
 30 NORTH 8th AVENUE
 MAYWOOD, ILLINOIS

RAMBOLL AMERICAS
 ENGINEERING SOLUTIONS, INC.
 A RAMBOLL COMPANY

RAMBOLL

RAMBOLL

**ATTACHMENT 3
ENGINEERED BARRIER INSPECTION FORM**

Engineered Barrier Inspection Form
Chem-Plate Industries, Inc. Facility
30 North 8th Avenue, Maywood, Illinois

Inspector(s)/Signature	Angela DeDolph, P.E. <i>Angela E. DeDolph</i>
Date/Time of Inspection	December 12, 2025/10:00 am
Company	Ramboll Americas Engineering Solutions, Inc.
Registration Number	062.054572
License Expiration Date	November 30, 2027
Professional Engineer Stamp	
Interior Building Floor	
Condition of Building Floor	• Pallets and materials were stored in portions of building, which limited the ability to observe the floor condition in those areas. • Property owner reported that the floor slab is 6 to 8 inches thick. • The visible portions of the floor in the northeastern portion of the building were in good condition; cracks were minimal and appeared shallow. • The visible portions of the floor in the northwestern and southern portions of the building contained some moderate cracks and holes. The cracks did not appear to penetrate the full depth of the slab, but many were filled with dirt/debris.
Summary of Locations where Repairs Needed	• Property owner plans to clear remaining pallets and storage. • When building is empty, floors will be cleaned using a power broom or equivalent. • Cracks and holes in the northwestern and southern portions of the building will be filled. If significant cracks or holes are observed in the northeastern portion of the building after floor cleaning, those will be filled as well.
Description of and Date Repairs Performed	• Not yet completed; work to be completed once stored materials are removed and floor is fully accessible.

**Engineered Barrier Inspection Form
Chem-Plate Industries, Inc. Facility
30 North 8th Avenue, Maywood, Illinois**

Exterior Areas	
Condition of Alley	• Due to recent snowfall, portions of the alley were snow covered. • The visible portions of the alley were in good condition with no observed cracks.
Condition of Exterior Paved Areas	• Due to recent snowfall, portions of the exterior paved area were snow covered. • The loading dock area had significant cracks. • Exterior asphalt had moderate cracks.
Summary of Locations where Repairs Needed	• Property owner plans to fill the loading dock area to bring it to grade and remove the portions of the retaining wall that area elevated above the surrounding grade. • Once the loading dock area is filled and the elevated portions of the retaining wall removed, the western portion of the property covered by the exterior portion of the engineered barrier will be paved between the alley and the building.
Description of and Date Repairs Performed	• Not yet completed; work will be scheduled pending weather conditions appropriate for asphalt paving.

**Engineered Barrier Inspection Photographs
Chem-Plate Industries, Inc. Facility
30 North 8th Avenue, Maywood, Illinois**

Date of Inspection: December 12, 2025



Photo 1: Interior Floor – view to the east of the northeastern portion of the building; visible portions of floor are in good condition with minimal shallow cracks.



Photo 2: Interior Floor – view of the floor in the northwest portion of the building adjacent to the loading dock area with cracks and holes.

**Engineered Barrier Inspection Photographs
Chem-Plate Industries, Inc. Facility
30 North 8th Avenue, Maywood, Illinois**

Date of Inspection: December 12, 2025



Photo 3: Interior Floor – view to the south of the floor in the southern portion of the building with a crack partially filled in.

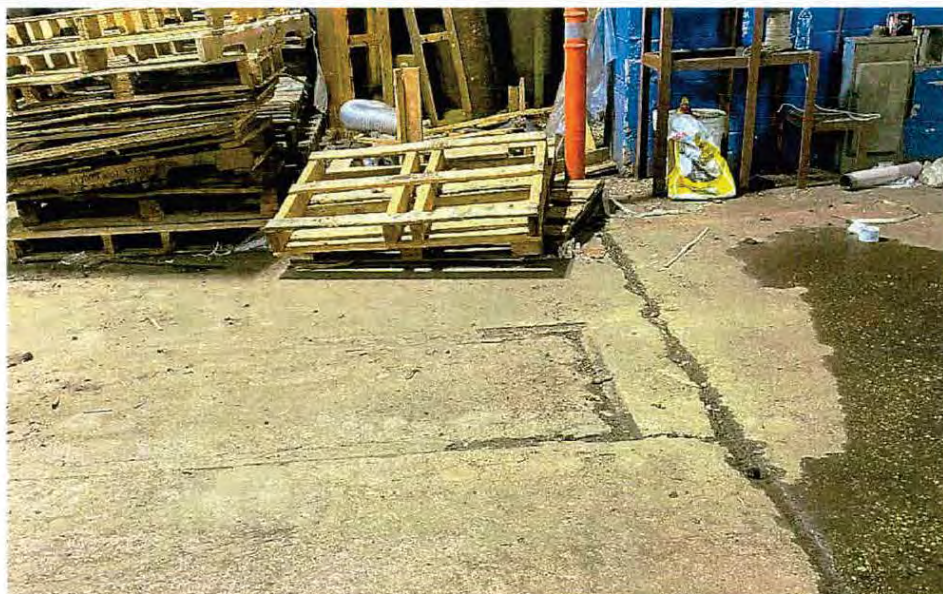


Photo 4: Interior Floor – view to the east of the floor in the southeast portion of the building with cracks needing repair.

**Engineered Barrier Inspection Photographs
Chem-Plate Industries, Inc. Facility
30 North 8th Avenue, Maywood, Illinois**

Date of Inspection: December 12, 2025

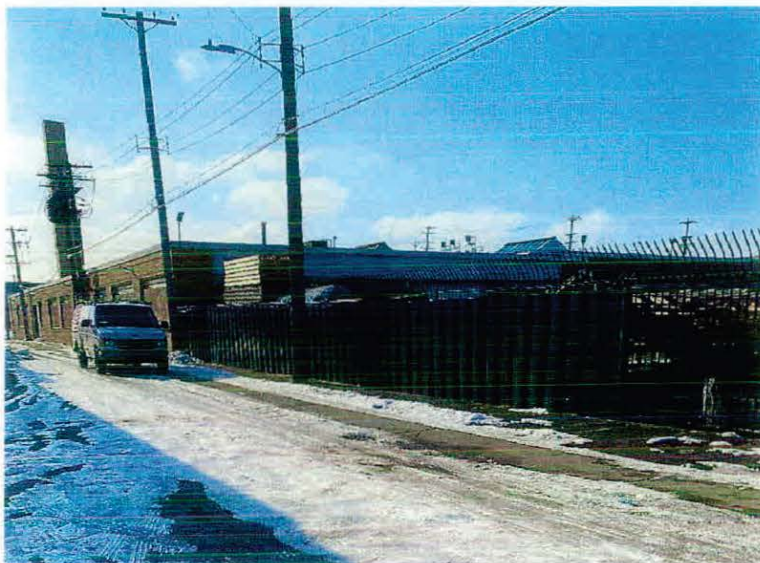


Photo 5: Alley – visible portions of alley are covered with concrete in good condition.

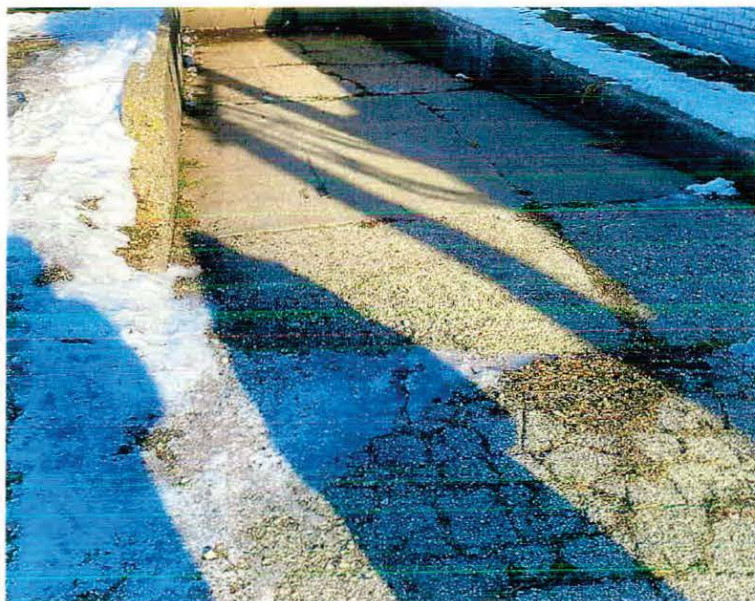


Photo 6: Exterior Paved Area – loading dock and adjacent asphalt pavement have cracks.

BOL Permit Section RCRA Tracking Sheet

BOLSiteCode 0311835009

Fed ID(s): ILD000665372

Respond by: 4/2/2026

Site: Chem Plate Ind Inc

Region: Des Plaines

City: Maywood

County: Cook

 Facility Permit Universe: ☐ OperatingUniverse ☐ PostClosureUniverse ☐ CorrActionUniverse ☐ UIC

Facility Type:

Right-to-Know Status:

RTK Status Change Date:

Site Comments:

Data Regarding Log #: C-658-M-12

Review Status	PermitClass	AppType	Reviewers:			
			RCRA	CAU	DAU	GU
Inactive	Closure Plan Mod	Interim Status Closure		BF		

LogComments:

Submittals for Log

DocTitle_Description	Submittal Type	Review Type	Agency Response
Response to 8/8/2025 IEPA comments on RCRA Closure Plan Addendum dated 2/29/2024	1st Submittal	Technical	

Submittal Received: 01/05/2026

Date Due: 04/05/2026

Pub Notice/Date Mailed:

Submittal Comments:

Final Action Data

For Log No: C-658-M-12

Units Addressed	Final Action Status	Date FA Issued	Date NFA	Date Closure Cert Accepted	Acres Remediated
	Denied	03/03/2026			0

 Closure Type: Institutional Control ☐ Clean Closed: ☐ 1 Institutional Control: ☐ 2 Institutional Control: ☐

REVIEW NOTES CHECKLIST**General Information**

0311835009 – Cook County

Chem-Plate Industries Inc

ILD000665372

Log No: C-658-M-12

Start of Review (Date)	January 14, 2026	
Project Manager	Behzad Fedaa	
Groundwater Unit Reviewer		
Corr. Action Reviewer		
Brief Description of Project	Addendum to Closure Plan	
Site Name/Location	Chem-Plate Industries Inc 30 N 8th Ave Maywood, IL 60153	
Facility Contact ☒ - Operator ☒ - Owner	Chem-Plate Industries Inc Attn: Aaron Straus 1800 Touhy Ave Elk Grove Village, IL 60007	Phone #: 312-749-1600 Email: aistraus@chemplateindustries.com
Owner ☒ - Same as Facility Contact		Phone #: Email:
Consultant	Ramboll Americas Engineering Solutions Inc Attn: Daniel Petersen & Angela DeDolph 333 W Wacker Dr Chicago, IL 60606	Phone #: 847-224-5441 (Petersen) 224-659-9102 (DeDolph) Email: dpetersen@ramboll.com adedolph@ramboll.com
Forms, Certifications and Original Signatures	☒ - All required forms are provided with the application. ☒ - Professional Engineer and Licensed Professional Geologist have provided a certification statement and seal as required. * ☒ - Original signatures present on all documents/forms provided with application. * * Original signatures/seals are not required on additional copies of the application.	
Siting (Sec. 3.330 of Act) <u>Cert. of Siting (LPC-PA8)</u>	Has siting for facility been approved: ☐ -Yes ☐ -No ☒ -NA	
Environmental Justice Evaluation (See <u>Procedure I.28</u>) <u>EJ Start</u> <u>EJ Review Request Webpage</u> <u>EJ Review Request System</u>	Determine if the submittal requires an Environmental Justice (EJ) evaluation, if so use the <u>EJ Start</u> webpage to determine if the facility is located within an EJ area. See <u>BOL Permit Procedure I.28</u> for information on applicability, and performing an EJ evaluation. See the <u>EJ Review Request System Guide</u> for information on submitting an EJ Review Request. a. EJ Evaluation Required: ☒ -Yes ☐ -No	

<u>Guide</u>	b. EJ SWAP Results: ☐-Not in an EJ Area ☐-Blue (1) Minority ☐-Yellow (2) Low Income ☒-Red (3) Minority & Low Inc. c. EJ Review Request: If the facility is in an EJ area submit an EJ Review Request to the EJ Office using the <u>EJ Review Request</u> webpage. d. Final EJ Office Evaluation Response: (Note: Projects with an EJ status of "Outreach in Progress" will not be signed by the Permit Section Manager). ☒-Complete – No Outreach ☐-Complete – With Outreach e. Documentation: Emails from EJ Office documenting the EJ review should be attached to review notes. Notes:
39(i) Certification <u>39(i) Cert. form (LPC 643)</u> a. Review (See <u>BOL Adm. Procedure I.25</u>, <u>39(i) Investigations Memo</u> & Sec. 39(i) of the Act)	☒-Not Applicable as this is not an application for a RCRA permit, permit modification, waste storage site, landfill/disposal site, transfer station, treatment facility, incinerator, waste transportation, CCDD fill operation, or tire storage site. <u>Review of 39(i) Certification:</u> I. Applicant Information: ☐-Complete/adequate ☐-Not complete/not adequate II. Officers & Employees: ☐-Complete/adequate ☐-Not complete/not adequate III. Owner, Operator, Officer, and Employee Information: A. Prior Conduct Identification: ☐-Yes ☒-No: Are one or more of the questions in this section marked "Yes"? If so, an Attachment A must be included (see below). B. Pending Proceedings: ☐-Yes ☒-No: Are one or more of the questions in this section marked "Yes"? If so, an Attachment A must be included (see below). C. Prior Application Information: i. ☐- Yes ☒-No: Are Previously submitted <u>Attachment A</u>'s incorporated into this Certification? ii. ☐- Yes ☐-Not complete/adequate: If C.i. is checked yes; are the applications containing the previously submitted <u>Attachment A</u>'s identified? Certification Statement: ☐-Yes ☒-Not complete/not adequate: Has the certification been signed by responsible corporate officer who meets the requirements of 702.126(a)(1)? Attachment A – Information for Individual Persons: Required if item III A. and/or B. above is check Yes. ☒-N/A ☐-Yes ☐-Not complete/adequate: Attachment A has been completed and contains the required information for individuals, identified in Section II that have prior findings, convictions or pending proceedings.

b. FACES Database Review <u>FACES-DB</u> <u>FACES – 39i Guidance</u> <u>FACES User Manual</u>	☐ -Yes ☒ -No: Facility has more than two consent decrees. If “Yes” request Full Compliance History (FCH), see item c. below. Notes:
c. Full Compliance History (FCH) Review	FCH Requested: ☐ -Yes ☒ -N/A: If item b above is checked yes, request a full report of the site compliance history for the facility from the Waste Reduction and Compliance Section, Manager. ¹ Date FCH request made:
d. Other Information	Other Information: ☐ -Yes ☒ -No: Other information has been identified that suggest that applicant has not been truthful, or information provided is incomplete. Other information can be from public comments, news reports, personal knowledge, etc.
e. 39i violations identified that may require permit denial.	☐ -Yes ☒ -No: 39i violations identified that may require permit denial. If yes, a memo to the Unit Manager should be prepared detailing the violations. i. ☐ -A memo, dated _____, has been forwarded to the Unit Manager for evaluation.
f. Revised Permit Condition for 39(i)	☐ -Yes ☒ -N/A: Permit Condition _____ has been revised to require the submittal of 39(i) Certification Forms with all applications (see item 4 of <u>BOL Adm. Procedure I.25</u>).
Field Office Section	a. FOS Region/Contact: Anthony Guido Email: anthony.guido@illinois.gov Phone: 847-294-4072 b. Field Inspection Required: ☐ -Yes ☒ -No If yes, a memo/email should be prepared and sent to the FOS contact, copy FOS Regional Manager. i. ☐ -A memo/email, dated _____, has been forwarded to the FOS. c. Comments Received from FOS: ☐ -Yes ☒ -No
CROPA Memo <u>Procedure I.31</u> <u>CROPA Template</u>	a. ☐ -Yes ☒ -No : CROPA Memo distributed on _____. i. ☐ -Yes ☐ -No: Permit(s) from other Bureaus required.
Change of Basic Facility Information (Change of: Name, Owner/Operator, Contact Information, etc.)	a. ☐ -Yes ☒ -No If yes: i. Facility with BOL ID/Inventory Number only (Non-RCRA Facility): ☐ -Reviewer has completed <u>Site Inventory Data Input Form</u> -OR- ☐ -Facility has submitted an <u>IEPA Inventory Application Form</u> . ii. Facility with a Federal (RCRA) ID Number : ☐ - Facility has submitted a revised <u>Notification of Regulated Waste Activity Form (USEPA Form 8700-12)</u> .

¹ See item 2 of June 26, 2018 39(i) Investigations Memo

Right-to-Know (RTK) Evaluation <u>Sec. 25d of Act</u> <u>Right-to-Know Evaluation Form (2/2024)</u> <u>Contaminant Evaluation Group (CEG) Referral Form (1/2024)</u> <u>IEPA Right-to-Know Website</u>	A Right-to-Know (RTK) evaluation must be performed for any review in which soil, soil gas and/or groundwater contamination data is reviewed. a. ☐ -N/A No release near the property boundary has been documented. b. ☐ -RTK Evaluation performed, <u>RTK Evaluation Form</u> attached. c. Soil, soil gas and/or groundwater contamination were evaluated. The evaluation determined: • ☐ -Further evaluation required and Item d below must be completed. • ☐ -Additional information is required to make an evaluation. • ☐ -No criteria met; site does not warrant further evaluation. d. ☐ -<u>Right-to-Know Evaluation Form</u> required a CEG Referral Memorandum be completed and sent to Community Relations RTK Coordinator. Memo sent on date: _____ e. ☒ -Other: <u>Right-to-Know Evaluation Form</u> completed, met criteria for referral to CEG but was not required based on: release event occurred too long ago for RTK referral Notes:
RCRA Permit, RCRA Corrective Action, & RCRA Closure Submittals <u>USEPA RCRAInfo Database</u> <u>IEPA RCRAInfo Data Entry Guidance (Draft)</u> <u>USEPA R1 RCRAInfo Data Entry Walk Through</u> <u>USEPA Comprehensive RCRAInfo Help & Guidance</u> <u>USEPA RCRAInfo Data Element Dictionary</u>	☐ - N/A: Submittal(s) is not a RCRA Permit, RCRA Closure or RCRA Corrective Action Submittal. a. ☒ - RCRA Info: Enter data into the <u>USEPA RCRAInfo Database</u> for RCRA permits, permit modifications, RCRA Closure and Corrective Action submittals as required. See linked documents to the left for additional guidance. b. ☐ -Yes ☐ -No ☒ -N/A: Permit Modification Class Correctly Identified: The submittal has been properly classified by the applicant i.e., as a Class I, Class I*, Class II or Class III modification (35 IAC 703.280) or as a Corrective Action submittal. If the permit class was <u>not</u> correct: • ☐ - Admin Support was contacted to correct the permit class in the RCRA Database, and the Tracking Sheet was updated and was redistributed to the FOS regional office and other staff. • ☐ -Yes ☐ -N/A: If necessary, the applicant has been notified of the change in the permit modification Class of the submittal. (35 IAC 703.280(d)(2)(A); 703.282(f)).

Review Notes

Reviewer: Behzad Feda (BF)

Subject: Response to Closure Plan Disapproval Letter

Basis

This review is for the document dated December 29, 2025, and received by Illinois EPA on January 5, 2026. The subject submittal is the response to Illinois EPA's disapproval letter dated August 8, 2025, regarding the closure plan addendum for Chem-Plate Industries Inc (Chem-Plate).

History

Chem-Plate is a metal finishing business located in Cook County. Before plating, metals are degreased using tetrachloroethylene (aka perchloroethylene aka PCE). PCE is a listed hazardous waste with code U210.

On March 26, 1992, Illinois EPA cited Chem-Plate for storing PCE in containers for longer than 90 days without a RCRA permit. Illinois EPA approved the closure plan for the container storage area on November 2, 1992, which included conditions to investigate the area for contamination. Soil investigations found that PCE contamination extended into the alley west of the facility and into an adjacent property. Illinois EPA approved engineered barriers and an environmental land use control (ELUC) on April 23, 2004, as part of the remediation process for the affected parcels in accordance with 35 IAC Part 742. The ELUC for the facility was recorded on December 9, 2005. A separate ELUC was recorded for the off-site property.

In 2022, Illinois EPA identified that several aspects of Chem-Plate's closure plan were incomplete. Namely, the engineered barriers were not maintained, the facility had not yet signed a Highway Authority Agreement with the Village of Maywood to address the contamination that extended into the alley west of the facility, and a closure certification report was never submitted. Chem-Plate sent a letter that was received by Illinois EPA on March 6, 2024, to address the outstanding issues with the closure plan.

Evaluation

Response to Comment 1

"The building is currently used to store parts by a former tenant but will soon have no regular occupants. As such, there is currently only a minimal risk to the occasional worker that may enter the building to obtain parts.

Chem-Plate intends to demolish the above grade structure, leaving only the floor slab in-place. Chem-Plate will also implement an Environmental Land Use Control (ELUC) requiring the

installation of a vapor mitigation system or vapor barrier for any future occupiable structures constructed within 50 feet of the identified area of contamination."

Reviewer Comment:

Establishing an institutional control which requires a building control technology to address vapor intrusion satisfies the requirements of 35 IAC 742.312 to exclude further consideration of the indoor inhalation exposure route.

However, according to 35 IAC 742.305, no exposure route can be excluded if contaminants exceed the soil saturation limit. Upon review of the site's soil sampling data from 1997 (Log No C658M5), it appears that a boring (designated C6 in the 1997 data) exceeds the soil saturation limit for trichloroethylene and tetrachloroethylene. See Conclusion for additional discussion of this matter.

Response to Comment 2

"Chem-Plate respectfully disagrees with IEPA's request for additional investigations...Facility operations ceased in 1995, and all relevant chemicals were removed from the building shortly thereafter. Investigations failed to identify groundwater in any of the borings, the deepest of which extended to 25 feet below ground surface. This was corroborated by regional geologic studies...for example, the TechLaw Inc Preliminary Assessment/Visual Site Inspection Report dated April 29, 1998. Testing of the gray clay underlying the site indicates that its permeability ranges from 9.84E-9 to 1.23E-8 cm/sec indicating that the clay is extremely impermeable.

Soil has never been exposed in the building and the roof has prevented water from percolating into the soils and causing migration from the residual source material. There is no indication that groundwater is used as a potable source of water at or in the vicinity of the site. In addition, there is a current groundwater ordinance in place for Maywood prohibiting the installation or use of potable water supply wells in Maywood (Ordinance No CO-99-30, accepted by IEPA on 4/26/2000).

Chem-Plates believes that IEPA's request for additional investigations is unnecessary for the following reasons:

- the highest concentrations of VOCs are beneath the building, which are protected from infiltration
- groundwater is not present within at least 25 feet of the ground surface
- the underlying soils are extremely impermeable...
- chemicals have not been used or stored at the facility since approximately 1995
- engineered barriers have been present over most of the area with the exception of the small strip of gravel adjacent to the building under which it is unknown whether an engineered barrier exists
- there is currently a groundwater ordinance in place in Maywood"

Reviewer Comment:

As referenced in my above comment, even if the relevant exposure routes are incomplete, they cannot be excluded if soil saturation limit exceedances exist. The facility must demonstrate that such exceedances no longer exist before they can exclude exposure routes or meet risk-based remediation objectives. In addition, because the contamination involved chlorinated solvents, the risk has likely increased at the facility due to degradation of PCE, trichloroethylene, and dichloroethylene to vinyl chloride, which is more acutely hazardous than its parent products. For that reason, further investigation and remediation must be completed.

"...It is Chem-Plate's intention to demolish the above-grade structures present at the site and establish an ELUC to address the vapor intrusion pathway. During demolition, any soils excavated in areas subject to the engineered barrier will be stockpiled on plastic within the area of concern and then replaced at the approximate same location and depth in accordance with RCRA requirements under OSWER Directive 9441.1922(16)."

Reviewer Comment:

I couldn't find the specified OSWER Directive.

"After the demolition is complete, engineered barrier deficiencies will be addressed. Chem-Plate proposes to repair the engineered barriers after demolition because the heavy equipment and demolition processes may result in significant wear and tear on the surfaces. Thus, once the demolition debris is removed, the cracks in the concrete floor will be cleaned and sealed and the loading dock area leveled to grade and paved with a minimum of 6 inches of asphalt. Because of the weather, it will not be possible to asphalt the dock area until the spring of 2026."

Reviewer Comment:

This is acceptable.

"In regard to IEPA's inquiry about the adjacent property...Chem-Plate notes that IEPA approved an ELUC...that required installation and maintenance of an engineered barrier at the neighboring Megenbier property located to the west of the Chem-Plate facility in a March 31, 2004, letter. As a result, IEPA determined no further action was necessary to address soil contamination on that property."

Reviewer Comment:

I read the terms of that ELUC and the responsibility for maintenance of the barrier was explicitly transferred to the owner of the Megenbier property. The owner of that property will be contacted to inform them that their ELUC must be amended to address potential vapor intrusion concerns.

Response to Comment 3

The appropriate forms were included with this submittal.

Response to Comment 4

"An integrity inspection was conducted by an Illinois-licensed Professional Engineer (PE) on December 12, 2025...Attachment 3 includes a completed inspection form...The interior inspection revealed some minor and moderate cracks in the concrete and some holes that appear to be related to concrete patch failing in old soil borings. A portion of the floor could not be observed because of the presence of pallets but will be inspected after removal of materials and demolition. The observed cracks did not appear to fully penetrate the slab.

Significant cracks were observed in the loading dock area and moderate cracks in the adjacent pavement. The visible portions of the alley were in good condition, with no observable cracks. Because of snow cover, portions of the area could not be observed."

Response to Comment 5

Chem-Plate will present a cost estimate to complete the remaining work that will include a 10% contingency.

Response to Comment 6

Chem-Plate will sign an amended Highway Authority Agreement with the Village of Maywood, if necessary, after the activities described in the subject submittal are completed.

References

35 IAC Parts 725 and 742

Conclusion

The subject submittal, previous letters, and field boring logs indicate that the soil around the facility consists mainly of silty clay. Equation S29 from 35 IAC Part 742 can be used to calculate soil saturation limits for vinyl chloride, cis 1,2-dichloroethylene, trans 1,2-dichloroethylene, trichloroethylene, and tetrachloroethylene:

Contaminant	Subsurface Csat (mg/kg)
vinyl chloride	2200
cis 1,2-dichloroethylene	700
trans 1,2-dichloroethylene	1500
trichloroethylene	520
tetrachloroethylene	290

Boring C6, at 8 to 9 feet, had concentrations of trichloroethylene and PCE of 1000 and 410 mg/kg, respectively. Despite the Csat limit exceedance, Illinois EPA allowed for exclusion of the migration to groundwater exposure route in a September 1997 Tier 3 evaluation (see attached memo). From my review of the records, it appears that only that specific exposure route was addressed in the Tier 3 evaluation; therefore, the soil saturation limit exceedance prevents the facility from excluding other exposure routes. Note that the memo states that the soil ingestion and inhalation pathways will be addressed through engineered barriers and institutional controls, which I believe was an incorrect application of 35 IAC Part 742 regulations.

Since the 1997 data demonstrates that Tier 1 Industrial/commercial remediation objectives were not met, I calculated Tier 2 industrial/commercial remediation objectives using the soil screening level (SSL) equations provided in 35 IAC Part 742 and with consideration for the site geology.

Contaminant	Soil Ingestion (mg/kg)	Outdoor Inhalation (mg/kg)
vinyl chloride	7.9	1.3
cis 1,2-dichloroethylene	4100	200
trans 1,2-dichloroethylene	41000	160
trichloroethylene	120	3.1
tetrachloroethylene	2700	77

Several borings emplaced in the 1997 investigation exceed the Tier 2 remediation objectives for the outdoor inhalation exposure route. In addition, each of these contaminants are volatile enough to have indoor inhalation risks. The soil vapor saturation limit cannot be exceeded if the facility would like to exclude consideration of the indoor inhalation exposure route through removal of the building and establishing an ELUC requiring building control technologies to mitigate vapors. Considering the above, it appears that it is necessary to investigate the current soil conditions. Note that Chem-Plate and its consultants were approved to conduct soil remediation using steam vapor extraction, but it is unclear whether this procedure was completed (Log No C-658-M-5).

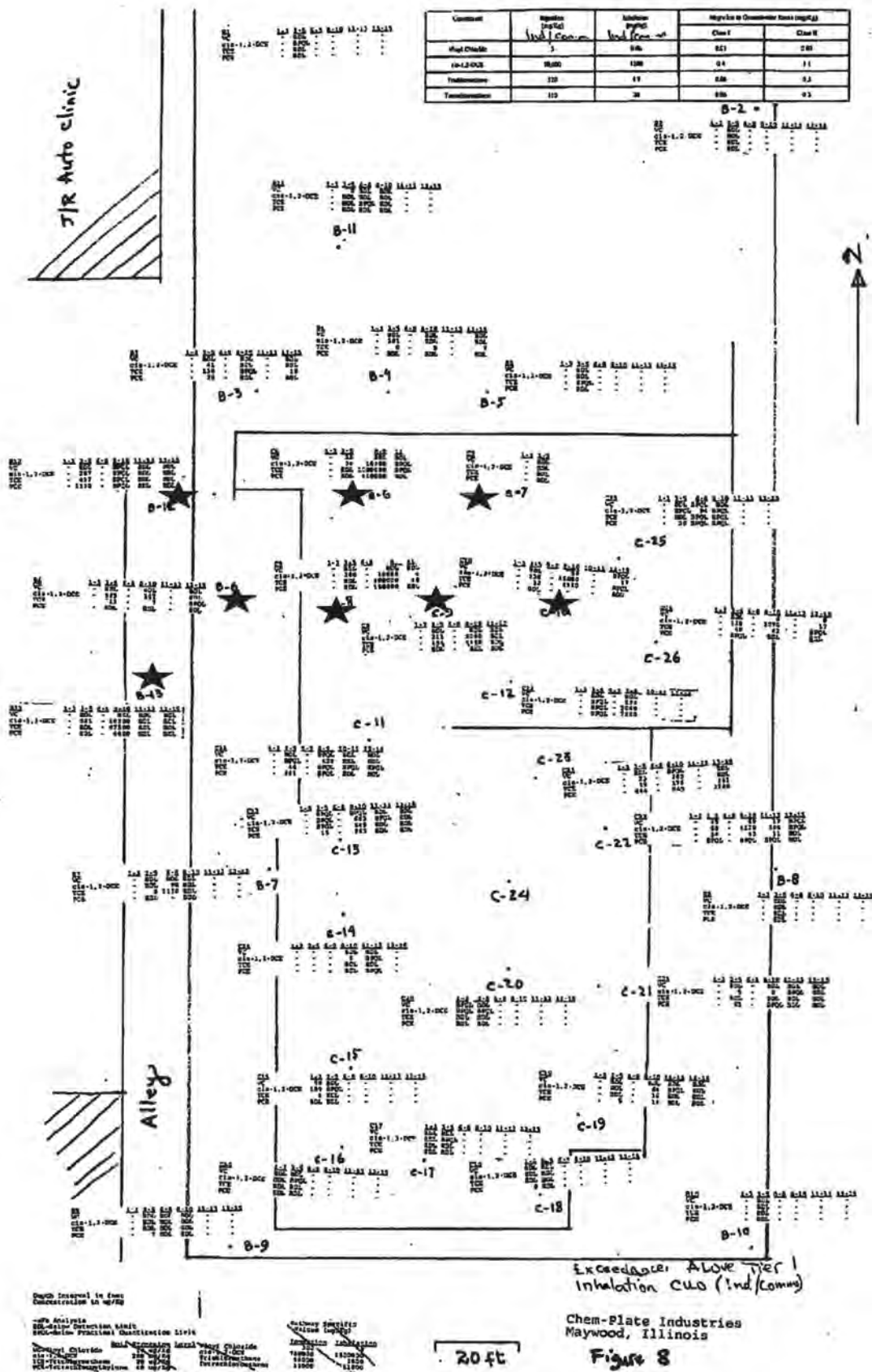
In our October 31, 2025, meeting with Chem-Plate, the facility informed us that it was their intention to sell the facility because they do not have the finances to complete any remediation that may be required beyond what was introduced in the subject submittal. Since the soil contamination at the facility has been delineated previously, and there is no reason to believe that the contamination has migrated horizontally given the site's hydrogeology, I believe that we

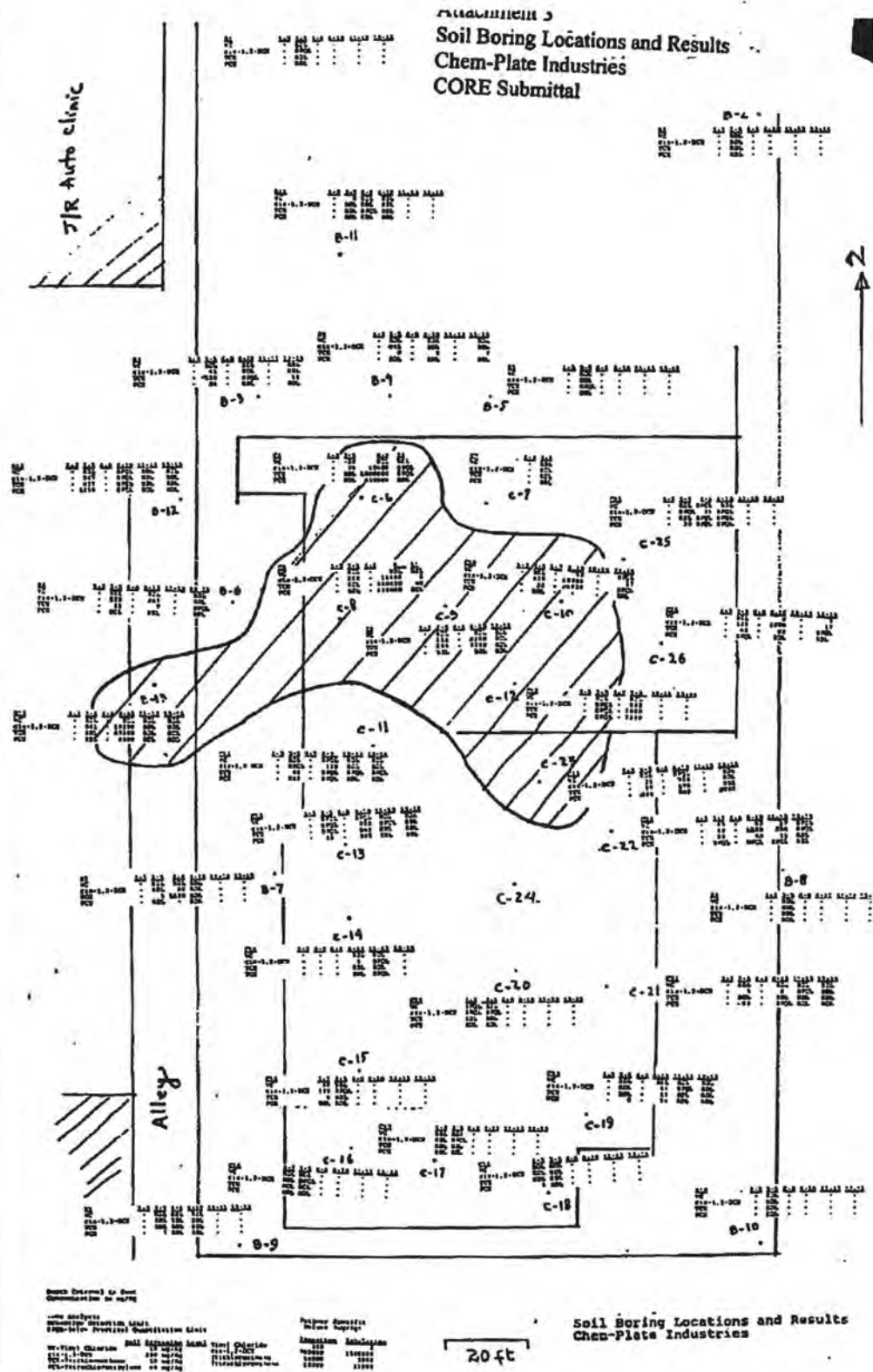
can require a limited soil investigation centered around boring C6 to observe the current soil conditions. Additional work can be required after this initial investigation if it is deemed necessary. I would like borings C6, C7, C8, C9, C10 and B6, B12, B13 to be revisited (see below figures).

Recommendation

I recommend not approving the subject submittal for the following reasons:

1. Illinois EPA has reviewed the data collected from historical site investigations conducted by Terra Nova Research Inc which were reported to Illinois EPA in a document (Log No C-658-M-5) dated July 25, 1997, and has determined that the contaminants trichloroethylene and tetrachloroethylene were present in concentrations higher than their soil saturation limit. In accordance with 35 IAC 742.305, no exposure route can be excluded from consideration while contaminants exceed their soil saturation limit.
2. Illinois EPA has calculated the Tier 2 industrial/commercial remediation objectives using site-specific information presented in the 1997 report and in accordance with the soil screening level equations presented in 35 IAC 742. Appendix C. The calculations indicate that several boreholes had contaminant concentrations higher than the Tier 2 industrial/commercial remediation objectives.
3. Illinois EPA expects that much of the contamination has naturally degraded over time since the 1997 investigation; however, the product of natural degradation of tetrachloroethylene and trichloroethylene is vinyl chloride, a contaminant that poses greater risk to human health and the environment than the original contaminants.
4. Considering the level of contamination that was historically detected, the present need to investigate the indoor inhalation exposure route in accordance with 35 IAC 725.211 and 35 IAC 742.115, and the nature of the contaminants involved, it appears prudent to reassess the current soil conditions before Illinois EPA can approve closure of the hazardous waste management unit.
5. Within 60 days of the date of this letter, submit a work plan investigating the soil and soil gas at this facility which includes the following:
 - a. background information about the facility;
 - b. the goals and objectives of the sampling effort;
 - c. a description of the quality assurance/quality control procedures that will be utilized during sampling;
 - d. a description of the sampling procedures;
 - e. a description of how waste generated by sampling will be handled.





MEMORANDUM

DATE: September 18, 1997
TO: CORE
FROM: Munib Ahmad and Jim Moore (BOL-Permits)
SUBJECT: 0311835009--Cook
Chem-Plate Industries, Inc.
RCRA Closure

1.0 Recommendation Requested From CORE

This is a request for a site-specific soil cleanup objectives for RCRA closure of a hazardous waste container storage area at the Chem-Plate facility, located in Maywood, Illinois. The Permit Section recommends that the migration to groundwater route at the site be addressed through the use of an engineered barrier and an institutional control to achieve a "No Further Remediation" designation for this project. The engineered barrier and institutional control are being used to eliminate the inhalation and ingestion pathways.

2.0 Background

Description of the Facility

Chem-Plate Industries was an electroplater which utilized nickel, copper, zinc, cadmium, and chrome in their cyanide bearing processes. The facility is located in Section 2, Township 39 North, Range 12 East of the third Principal Meridian in Cook County, Illinois. A topographic map showing the location of the facility is included as **Attachment 1**. Perchloroethylene was used at the facility to degrease the items to be plated.

Description of the Hazardous Waste Management Unit

Chem-Plate is undergoing RCRA Closure of one (1) indoor container storage area (SO1). The subject storage area is located in the northwest corner of the facility. The size of the storage area is about 10 ft by 15 ft and it has a concrete floor. The location of the container storage area is shown in **Attachment 2**. A RCRA inspection was conducted on March 26, 1992 of the facility. During this inspection, this unit was cited for storage of seven (7) drums of perchloroethylene waste for longer than 90 days.

Chem-Plate Industries (CORE Submittal)

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3.0 Environmental Media

Soil is the environmental media of concern at the site. The extent of contamination has been defined at the site and is shown on **Attachment 3**. The vertical extent of contamination extends to a depth of 8 to 10 feet. The contaminants of concern at the site are trichloroethene, tetrachloroethene, cis-1,2-dichloroethene, and vinyl chloride.

4.0 Geology/Hydrogeology of the Site

Based on the information obtained from the Geologic Susceptibility Map contained in the 1984 ISGS publication "Potential for Contamination of Shallow Aquifers in Illinois", the surficial geology in this location is described as *"Uniform, relatively impermeable silty or clayey till at least 50 ft thick; no evidence of interbedded sand and gravel"*.

The geologic cross-sections included as **Attachment 4** indicates that the shallow geology at the site consists of fill material which is about two to six feet in thickness. The fill material is comprised of mixed brown, mottled gray/brown and black silty clay. Beneath the fill lies a layer of brown/gray mottled silty clay, overlying a layer of brown silty clay. This extends from the bottom of the fill to a depth of ten to twelve feet. The underlying material is the gray silty clay.

Frequent stringers of sand, silty sand and sandy gravel were found in the indigenous brown and brown/gray mottled silty clay. Groundwater table was not encountered up to 20 ft depth. The facility performed permeability test of two samples of gray clay collected from two soil borings. The permeability was measured as 9.84×10^{-9} cm/s and 1.23×10^{-8} cm/s. The City of Maywood receives drinking water from the Lake Michigan.

5.0 Tier 1 EvaluationMigration to Groundwater Route

- The exceedances above the Tier 1 Class I cleanup objectives are identified below and are also depicted on **Attachment 5**.

Boring	Depth Interval	Constituent	Concentration (mg/kg)	Tier 1 Class I Value (mg/Kg)
C6	3'-5'	Vinyl Chloride	0.025	0.01
	8'-9'	cis-1,2-DCE	10.4	0.4
		Trichloroethene	1100	0.06
		Tetrachloroethene	410	0.06
C8	8'	cis-1,2-DCE	16.6	0.4
		Trichloroethene	400	0.06
		Tetrachloroethene	150	0.06

Chem-Plate Industries (CORE Submittal)
Page 3

Boring	Depth Interval	Constituent	Concentration (mg/kg)	Tier 1 Class I Value (mg/kg)
C9	3'-5'	Trichloroethene	0.154	0.06
	8'-10'	cis-1,2-DCE Trichloroethene	9.26 4.65	0.4 0.06
C10	8'-10'	Vinyl Chloride cis-1,2-DCE Trichloroethene	0.059 15 4.93	0.01 0.4 0.06
C11	3'-5'	Tetrachloroethene	0.261	0.06
C12	7'-8'	cis-1,2-DCE Trichloroethene Tetrachloroethene	0.592 3.06 7.25	0.4 0.06 0.06
C13	8'-10'	Trichloroethene Tetrachloroethene	0.549 0.965	0.06 0.06
C15	1'-3'	Vinyl Chloride	0.09	0.01
C22	3'-5'	Vinyl Chloride	0.045	0.01
	8'-10'	Vinyl Chloride cis-1,2-DCE	0.069 1.12	0.01 0.4
	11'-13'	Vinyl Chloride	0.017	0.01
C23	3'-5'	Tetrachloroethene	0.664	0.06
	8'-10'	Trichloroethene Tetrachloroethene	0.176 0.649	0.06 0.06
	13'-15'	Trichloroethene Tetrachloroethene	0.351 2.78	0.06 0.06
B3	3'-5'	Trichloroethene	0.13	0.06
B6	3'-5'	cis-1,2-DCE	0.525	0.4
B7	6'-8'	Trichloroethene	1.13	0.06
B12	3'-5'	Trichloroethene Tetrachloroethene	0.47 1.32	0.06 0.06
B13	3'-5'	cis-1,2-DCE	0.561	0.4
	8'-10'	cis-1,2-DCE Trichloroethene Tetrachloroethene	10.1 47.3 4.45	0.4 0.06 0.06

Chem-Plate Industries (CORE Submittal)

Page 4

- The exceedances above the Tier 1 Class II cleanup objectives are identified below and are also depicted on Attachment 6.

Boring	Depth Interval	Constituent	Concentration (mg/kg)	Tier 1 Class II Value (mg/Kg)
C6	8'-9'	cis-1,2-DCE	10.4	1.1
		Trichloroethene	1100	0.3
		Tetrachloroethene	410	0.3
C8	8'	cis-1,2-DCE	16.6	1.1
		Trichloroethene	400	0.3
		Tetrachloroethene	150	0.3
C9	8'-10'	cis-1,2-DCE	9.26	1.1
		Trichloroethene	4.65	0.3
C10	8'-10'	cis-1,2-DCE	15	1.1
		Trichloroethene	4.93	0.3
C12	7'-8'	Trichloroethene	3.06	0.3
		Tetrachloroethene	7.25	0.3
C13	8'-10'	Trichloroethene	0.549	0.3
		Tetrachloroethene	0.965	0.3
C15	1'-3'	Vinyl Chloride	0.09	0.07
C23	3'-5'	Tetrachloroethene	0.664	0.3
	8'-10'	Tetrachloroethene	0.649	0.3
	13'-15'	Tetrachloroethene	2.78	0.3
B7	6'-8'	Trichloroethene	1.13	0.3
B12	3'-5'	Trichloroethene	0.47	0.3
		Tetrachloroethene	1.32	0.3
B13	8'-10'	cis-1,2-DCE	10.1	1.1
		Trichloroethene	47.3	0.3
		Tetrachloroethene	4.45	0.3

Chem-Plate Industries (CORE Submittal)

Page 5

6.0 Tier 1 Values for Ingestion and Inhalation Pathways

Constituent	Residential (mg/kg)		Industrial/Commercial (mg/kg)	
	Ingestion	Inhalation	Ingestion	Inhalation
Tetrachloroethene	12	11	110	20
Trichloroethene	58	5	520	8.9
cis-1,2-dichloroethene	780	1200	20000	1200
Vinyl Chloride	0.3	0.03	3	0.06

7.0 Cultural Setting

The facility is surrounded on the south and west by other industrial sites. Retail establishments front Lake Street to the west. Residential areas lie across Eighth Avenue to the east, and across Lake Street to the north. The facility is not operational at this time. The facility will be required to maintain engineered barrier and impose institutional controls for the protection against the inhalation and ingestion exposure routes.

8.0 Recommended Action or Resolution

The Permit Section recommends that the migration to groundwater route be considered eliminated due to the following reasons:

- The geology consists of impermeable silty or clayey till at least 50 ft thick. This indicates that the potential for downward migration of contamination is very low.
- The soil borings completed at the site indicate that silty clay is present down to 20 feet and no groundwater was encountered.
- The borings where contamination was detected at high concentrations at 8'-10' depth intervals are clean at 11'-13' depth interval.
- The contaminated area is present underneath the concrete floor of a building (an engineered barrier). Therefore, the possibility of the precipitation percolating into the ground do not exist. A deed restriction requiring continued maintenance of this barrier will be imposed.
- The City of Maywood receives its drinking water from Lake Michigan.

Chem-Plate Industries (CORE Submittal)
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List of Attachments

1. Site Location Map
2. Site Layout Map
3. Soil Boring Locations and Results
4. Geologic Cross-Sections
5. Exceedances Above Tier 1 Class I Values
6. Exceedances Above Tier 1 Class II Values

CORE RECOMMENDATION

- ☐ Concur with action or resolution proposed by the project manager
- ☒ Concur with action or resolution proposed by the project manager with the following conditions:

Facility needs to address off-site contamination
@ BQ-13
accepted by CORE 9/25/97
JKH

- ☐ Reject action or resolution proposed by the project manager
- ☐ Request the following information before issuing a final CORE recommendation:

Section Manager Elvin C. Bell Date 10/2/97

Unit Manager James K. Moore Date 9/18/97

Project Manager M. Munib. Ahmad Date 09-18-97

Notes:

Feda, Behzad

From: DoNotReply.EJRequest@illinois.gov
Sent: Monday, January 26, 2026 7:47 AM
To: Mara.McGinnis@illinois.gov; Bräd.Frost@illinois.gov; Pressnall, Chris; Herr, Alane; Lopez, Luis A.; Lopez-Santos, Paulina; Feda, Behzad
Subject: Outreach Status Change for Chem-Plate Industries Inc | 0311835009 | C658M12 | Land

The EJ source (Chem-Plate Industries Inc) has moved forward in the outreach process on 01/26/2026.

The status has changed from *Review Pending* to *Complete - No Outreach*.

BOL Permit Section RCRA Tracking Sheet

BOLSiteCode 0311835009

Fed ID(s): ILD000665372

Respond by: 2/4/2026

Site: Chem Plate Ind Inc

Region: Des Plaines

City: Maywood

County: Cook

Facility Permit Universe:

☐

Operating Universe

☐

Post Closure Universe

☐

Corr Action Universe

☐

UIC

Facility Type:

Right-to-Know Status:

RTK Status Change Date:

Site Comments:

Data Regarding Log #: C-658-M-12

Review Status	Permit Class	App Type	Reviewers:		
Active	Closure Plan Mod	Interim Status Closure	RCRA	CAU	DAU GU
			B5		

Log Comments:

Submittals for Log

Doc Title Description	Submittal Type	Review Type	Agency Response
Response to 8/8/2025 IEPA comments on RCRA Closure Plan Addendum dated 2/29/2024	1st Submittal	Technical	

Submittal Received: 01/05/2026

Date Due: 04/05/2026

Pub Notice/Date Mailed:

Submittal Comments:

Final Action Data

For Log No: C-658-M-12

Units Addressed	Final Action Status	Date FA Issued	Date NFA	Date Closure Cert Accepted	Acres Remediated
					0

Closure Type:

Institutional Control

Clean Closed:

1 Institutional Control:

2 Institutional Control:



Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield, Illinois • 62794-9276 • 217-782-3397

JB Pritzker, Governor

James Jennings, Acting Director

217-524-3301

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

MAR 03 2026

9589 0710 5270 2887 2258 32

Aaron Straus
Chem-Plate Industries LLC
1800 Touhy Ave
Elk Grove Village, IL 60007

Re: 0311835009 -- Cook County
Chem-Plate Industries LLC
ILD00665372
Log No C-658-M-12
RCRA Closure - 24B
Permit Closure Final Action

*EPA - Division of Records Management
Releasable*

APR 29 2026

Reviewer: EMI

Dear Aaron Straus:

This letter is in response to the document dated December 29, 2025, which was received by Illinois EPA on January 5, 2026. It was submitted by Ramboll Americas Engineering Solutions Inc on behalf of Chem-Plate Industries Inc (Chem-Plate) in response to Illinois EPA's correspondence dated August 8, 2025, regarding the interim status closure of the hazardous waste container storage area (process code S01) at the Chem-Plate facility located at 30 North 8th Avenue in Maywood, Illinois.

The original closure plan for the hazardous waste storage area was approved on November 2, 1992 (Log No C-658), following an inspection by Illinois EPA which observed storage of tetrachloroethylene for greater than 90 days without a RCRA Permit. In 1993, soil investigations at the facility revealed that chlorinated solvent contamination had extended into the alley west of the Chem-Plate facility. Illinois EPA approved a Highway Authority Agreement with the Village of Maywood on March 9, 2011, for the alley and it approved an Environmental Land Use Control (ELUC) requiring engineered barriers over contaminated soil at the facility. The ELUC was recorded on December 9, 2005, with the Cook County Recorder of Deeds (Document No 0535603120). A separate ELUC for a contaminated neighboring property was recorded on January 20, 2004 (Document No 0402044036).

2125 S. First Street, Champaign, IL 61820 • 217-278-5800
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 • 618-346-5120
595 S. State Street, Elgin, IL 60123 • 847-608-3131
412 SW Washington Street, Suite D, Peoria, IL 61602 • 309-671-3022

115 S. LaSalle Street, Suite 2203, Chicago, IL 60603
9511 Harrison Street, Des Plaines, IL 60016 • 847-294-4000
2309 W. Main Street, Suite 116, Marion, IL 62959 • 618-993-7200
4302 N. Main Street, Rockford, IL 61103 • 815-987-7760

Please print on recycled paper.

0311835009 -- Cook County
Log No C-658-M-12
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More recently, Illinois EPA issued a Non-Compliance Advisory (NCA) to Chem-Plate on June 27, 2022, when it was observed that the activities required by the approved closure plan were not yet completed. Chem-Plate submitted a closure plan modification in response to the NCA dated February 29, 2024, which was not approved by Illinois EPA.

Illinois EPA has reviewed the subject submittal as a modification to the approved closure plan and cannot approve it for the following reasons:

1. Illinois EPA reviewed data submitted under Log No C-658-M-5, dated July 25, 1997, which indicate that trichloroethylene (TCE) and tetrachloroethylene (PCE) were present at concentrations exceeding the soil saturation limit. In accordance with 35 IAC 742.305, no exposure route may be excluded from consideration while contaminant concentrations exceed the applicable soil saturation limit.
2. Some of the original contamination may have naturally degraded over time; however, the degradation of PCE and TCE can produce vinyl chloride, a daughter product that poses greater risk to human health and the environment than the parent compounds.
3. In 2013, the indoor inhalation exposure route was added to 35 IAC Part 742. The most recent soil investigation at this facility did not evaluate this pathway; therefore, Illinois EPA requires evaluation of the indoor inhalation exposure route prior to completion of RCRA closure. Although demolition of the existing structure would typically render this pathway incomplete, contaminant concentrations exceeding the soil saturation limit, and potentially the soil vapor saturation limit, prevent exclusion of this pathway.
4. Illinois EPA allowed for exclusion of the soil component of the groundwater ingestion exposure route during a Tier 3 evaluation which was approved on September 18, 1997. This pathway does not need to be assessed further.
5. Within 60 days of the date of this letter, submit a work plan addressing the concerns identified in Conditions 1-3. The work plan must include:
 - a. background information about the facility;
 - b. the goals and objectives of the sampling effort;
 - c. a description of the quality assurance/quality control procedures that will be utilized during sampling;
 - d. a description of the sampling procedures;
 - e. a description of how waste generated by sampling will be handled;

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Log No C-658-M-12

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- f. the locations to be sampled, which must be approximately those locations indicated B-6, C-6, C-7, C-8, C-9, and C-10 on the map attached to this letter;
 - g. the list of analytes, which may be limited to PCE, TCE, cis and trans 1,2-dichloroethylene, and vinyl chloride; and
 - h. a plan for addressing the indoor inhalation exposure route at the affected off-site property located at 15 North 9th Avenue, Maywood, Illinois.
- 6. Chem-Plate does not have a current cost estimate and financial assurance for closure activities as required by 35 IAC 725.242–243. With the work plan described in Condition S, submit a cost estimate for the activities required to complete RCRA closure. Chem-Plate must establish financial assurance for the estimated amount within 60 days of Illinois EPA's approval of the cost estimate in accordance with 35 IAC 725.243.

This letter will constitute Illinois EPA's final decision on the subject submittal. The owner or operator may appeal this final decision to the Illinois Pollution Control Board in accordance with Section 40 of the Act by filing a petition for a hearing within 35 days after the date of issuance of the final decision. However, the 35-day period may be extended for a period not to exceed 90 days by written notice from the applicant and Illinois EPA within the initial 35-day appeal period. If the owner or operator wishes to receive a 90-day extension, a written request that includes a statement of the date the final decision was received, along with a copy of this decision, must be sent to Illinois EPA as soon as possible.

For information regarding the request for an extension, please contact:

Illinois Environmental Protection Agency
Division of Legal Counsel
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276
217-782-5544

For information regarding the filing of an appeal, please contact:

Illinois Pollution Control Board
60 East Van Buren Street, Suite 630
Chicago, Illinois 60605-1241
312-814-3620

Work required by this letter, submittal, or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the

0311835009 -- Cook County
Log No C-658-M-12
Page 4

Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This letter does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Questions regarding this letter should be sent to Behzad Feda by phone at 217-524-8980 or by email at behzad.feda@illinois.gov.

Sincerely,



Joshua L Rhoades, PG
Permit Section Manager
Bureau of Land

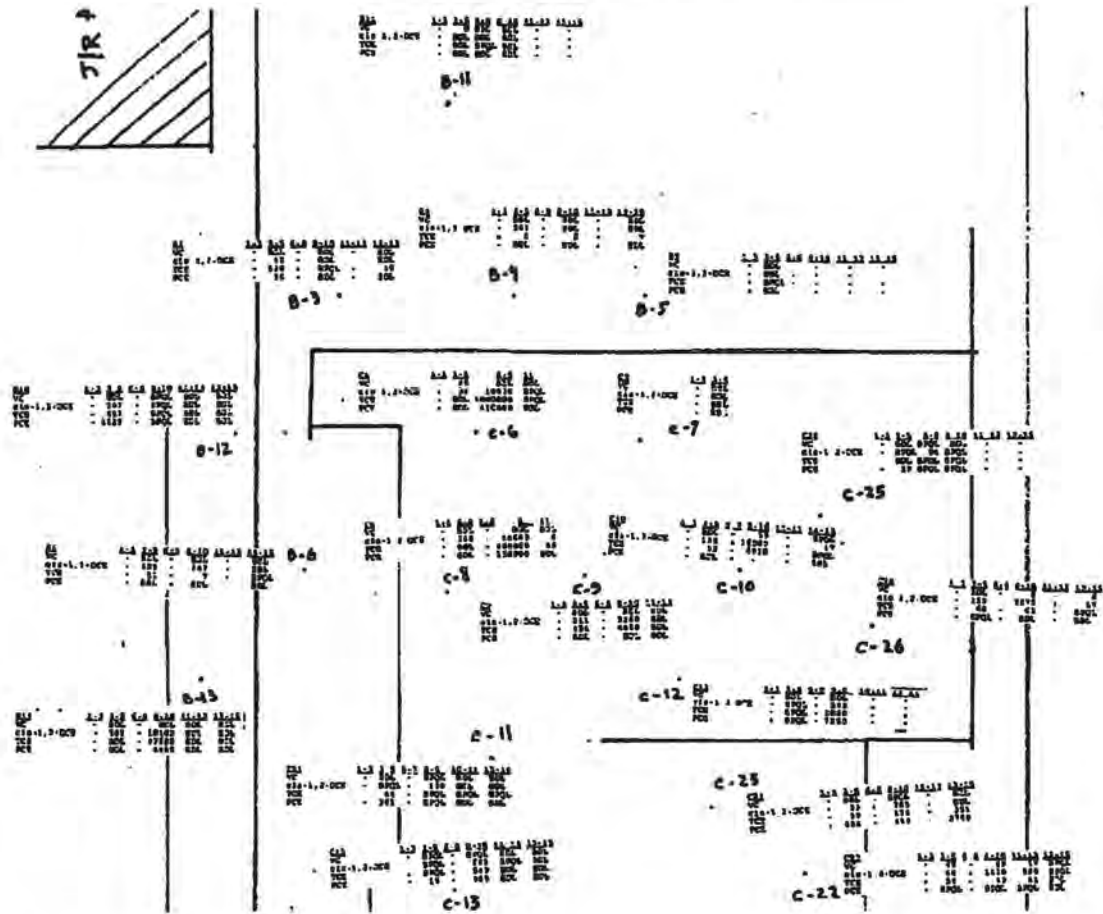
JLR:BF:0311835009-RCRA-C658M12-Denial.docx

BF TJH.

Attachment: 1997 Facility Map with Soil Data

cc: Angela DeDolph – Ramboll Americas Engineering Solutions Inc
Daniel Petersen – Ramboll Americas Engineering Solutions Inc

Attachment
1997 Facility Map with Soil Data



This is an excerpt from a map submitted with the 1997 soil investigation conducted by Terra Nova Research Inc (Log No C-658-M-5).