

**DECISION
MEMORANDUM**

**SPARTANS' SQUARE SHOPPING CENTER
NWC ILLINOIS ROUTE 53 & ALEXANDER CIRCLE
(3-23 TERRACE LANE, 615-625 ACCESS DRIVE)
ROMEOVILLE, WILL COUNTY, ILLINOIS
IEPA BOL SITE No. 1970905180**

**USEPA COOPERATIVE AGREEMENT
BF00E00881-0**

PREPARED FOR:

VILLAGE OF ROMEOVILLE
MS. DAWN CALDWELL
1050 W. ROMEO ROAD
ROMEOVILLE, ILLINOIS 60446

PREPARED BY:

V3 COMPANIES
7325 JANES AVENUE
WOODRIDGE, ILLINOIS 60517
630-724-9200

Village of Romeoville Spartans' Square Shopping Center Site DECISION MEMORANDUM

PURPOSE AND INTRODUCTION

The purpose of this Decision Memorandum is to document the Village of Romeoville's approval of the proposed environmental cleanup action at the Spartans' Square Shopping Center Redevelopment Site (the subject Site), which includes the former addresses 3-23 Terrace Lane and 615-625 Access Drive, located adjacent to Alexander Circle at the northwest corner of Illinois Route 53 and Alexander Circle in Romeoville, Illinois (**Figure 1**).

Site cleanup activities will consist of in-situ treatment where soil concentrations exceed IEPA Tiered Approach to Corrective Action Objectives (TACO) soil Remediation Objectives (ROs) concentrations for industrial-commercial and also above RCRA Alternative Land Disposal Restriction (LDR) Treatment Standards for Contaminated Soil. The Remediation Area (VOCs Impacts from Former Dry Cleaning Operations) is located in the southeastern portion of the property (**Figures 2 and 3.1**). Post-treatment verification sampling will be conducted to confirm that the limits of the excavation are below the remediation LDR goals.

The cleanup project is being financed using a U.S. EPA Cleanup grant (USEPA Cooperative Agreement # BF00E00881-0), through a formal agreement with the Village of Romeoville. The Village of Romeoville is acting as the Lead Agency for these remedial activities.

The Site is currently a USEPA Brownfield site owned by the Village of Romeoville. Future plans include the redevelopment of the subject Site for commercial use.

By approval of this memorandum, the Village of Romeoville determines that the remedial action will prevent public and construction worker exposure to chlorinated solvents, in the future via dermal contact, inhalation of dust and incidental ingestion of soil. The remedial action is being conducted to address these matters.

BACKGROUND AND SITE CONDITIONS

Prior to demolition, the Site contained a one-story commercial building with a paved parking lot. Site structure was demolished in summer 2013. A former asphalt paved parking lot was located in the northern portion of the Site, with concrete and asphalt paved access to the east and south. The Site and surrounding land use is commercial. Adjacent properties include similar commercial/retail properties.

Site soils consist of surface fill materials (asphalt, concrete, silty clay fill with bricks, sand and gravel) underlain by discontinuous areas of silty clay, clayey silt, or sand and gravel. Bedrock was encountered at depths ranging from 17-20 feet below ground surface.

The results of the previous site investigations indicate soil contaminants are present due to chemical spills from the former dry cleaner operations at the Site. The contaminants are metals and chlorinated solvents. The results of the previous site investigations indicate soil and groundwater contaminants are present due to chemical spills from the former dry cleaner operations at the Site. The contaminants are chlorinated solvents that resulted from the release of dry cleaning solvents that were historically used at the Site. It is not apparent that the identified metals concentrations represent a notable groundwater concern, and may be the result of relatively high suspended solids within collected samples. The area of impact remains

on the south end of the former dry cleaner location in soil and groundwater that are above state remediation objectives.

The data collected from 2008 to 2013 during the site investigations were compiled by V3 and presented in the CSI/ROR dated May 21, 2010, the Response to IEPA review letter of CSI/ROR dated February 18, 2011, the Supplemental CSI/ROR and RAP, dated June 2013 and the Amendment 1 to Supplemental CSI/ROR and RAP, dated August 1, 2013. The reports, including the RAP were approved in the August 14, 2013 review letter.

Site Current and Planned Use

The future site use is intended to be consistent with the commercial past site use. Redevelopment plans include a commercial /retail building with parking. The Site is currently vacant with no structures.

THREATS TO PUBLIC HEALTH AND STATUTORY AND REGULATORY AUTHORITIES

Public Health Threat

The previous Site investigations revealed that a limited area of the soil saturation limit for tetrachloroethylene concentration is present at the Site as a result of historic use as a dry cleaning facility. While the presence of tetrachloroethylene in shallow soils (from 0-3 feet deep) do not pose an immediate threat to the public, the VOC poses a potential threat to those involved in future development of the Site (e.g., construction workers) and leaching to groundwater resources.

State and Local Authorities

The IEPA Voluntary Site Remediation Program (SRP) will continue to participate in the project in its role as approving authority and the issuance of a No Further Remediation (NFR) letter, and the Village of Romeoville will continue to participate in their role as the local lead authority.

REMEDATION ALTERNATIVES ANALYSIS

A discussion and evaluation of remedial alternatives for contaminated soil was presented in the *Analysis of Brownfields Cleanup Alternatives (ABCA)* report, dated August 2013, which the Village has filed at the Village Clerk's office, as part of the Administrative Record for this project.

As previously mentioned, cleanup activity is for the area where soil concentrations exceed IEPA Tier 1 RO concentrations and the RCRA LDRs for specific solvents. The Remediation Area is located in the southeastern portion of the property (**Figure 3.1**).

Remediation Goals

Following remedial activities to address the chlorinated solvents, verification soil sample results will be analyzed and the cleanup activities will be deemed complete when concentrations of chlorinated solvents meet RCRA Alternative Land Disposal Restriction (LDR) Treatment Standards for Contaminated Soil (35 IAC Part 728.149 and 40 FDR Part 268.49), which will remove the need for additional pre-treatment of in-situ soils prior to potential future soil removals and disposal at a landfill (see **Figure 3.1 – Proposed Soil Remediation Area**). Specifically, the following LDRs will be used as the remediation objectives (ROs) for the primary contaminant of concern (COC) and related degradation products:

- Tetrachloroethylene (PCE): 60 mg/kg
- Trichloroethylene (TCE): 60 mg/kg
- 1,1,1-trichloroethane or 1,1,2-trichloroethane (TCA): 60 mg/kg each
- Trans-1,2-dichloroethane (DCE): 300 mg/kg

- Vinyl chloride (VC): 60 mg/kg

With the exception of PCE, the other COCs are currently below LDRs. However, the additional LDRs are provided for reference, if needed. *Note: Based on laboratory analytical results, the site soil concentrations for TCA, DCE and VC are 'non-detect' and one sample had a TCE concentration that exceeds the Tier 1 soil component of the groundwater ingestion RO.*

The intent of these remedial measures are to reduce VOC concentrations of impacted soils that may be encountered by end users during redevelopment and have the option to dispose off-site as non-hazardous waste. Any remaining exposure route Tier 1 soil RO exceedances may be addressed through engineering and institutional controls (construction worker notification, groundwater use restriction).

Soil Remediation Alternatives Analysis

The alternatives considered for mitigating the risks associated with the chlorinated solvent contaminated soil that exceed IEPA applicable ROs were discussed in the ABCA. The alternatives included no action, source removal (with landfill pre-treatment and with in-situ pre-treatment), capping and in-situ soil remediation without excavation.

Public Meeting

A public comment period focused on the Spartans' Square Shopping Center Redevelopment Site was held September 3 – October 2, 2013, during the 30-Day review period for the ABCA report. The comment period was announced in the local newspaper and the website. Public comment and questions were solicited on the ABCA. No public comments were submitted to the Village.

SELECTED REMEDIAL ACTION, SCHEDULE AND ESTIMATED COSTS

Selected Remedial Action

On the basis of effectiveness, costs within the grant budget, time constraints, future land use goals and site plans, regulatory criteria and technical feasibility, V3 recommends in-situ remediation (soil mixing with reagents) without excavation as the most appropriate alternative to remediate impacted soils.

Under V3's direction, the remediation contractor will mix and apply reagents to the impacted soils as depicted in the general area shown in **Figure 3.1**. The treated soils will be left in place. Verification soil samples will be collected and analyzed along excavation sidewalls and bottom.

The specific areas of soil to be remediated are at and in the vicinity of soil borings with the highest known concentrations and along adjoining underground utility lines. The general treatment area is 60 feet x 45 feet encompassing these locations.

Groundwater was encountered between 3 and 17 feet below ground surface in previous soil borings, and may be encountered during remediation activities. If groundwater is encountered in the remediation excavation in contact with contaminated soils, a vacuum truck that is a licensed special waste hauler will be used to pump out and transport the water to a licensed disposal facility.

Project Schedule

Pending final EPA approval, the Village and their consultant tentatively plan on commencing contracting and mobilization activities in October-November 2013.

Estimated Cleanup Costs

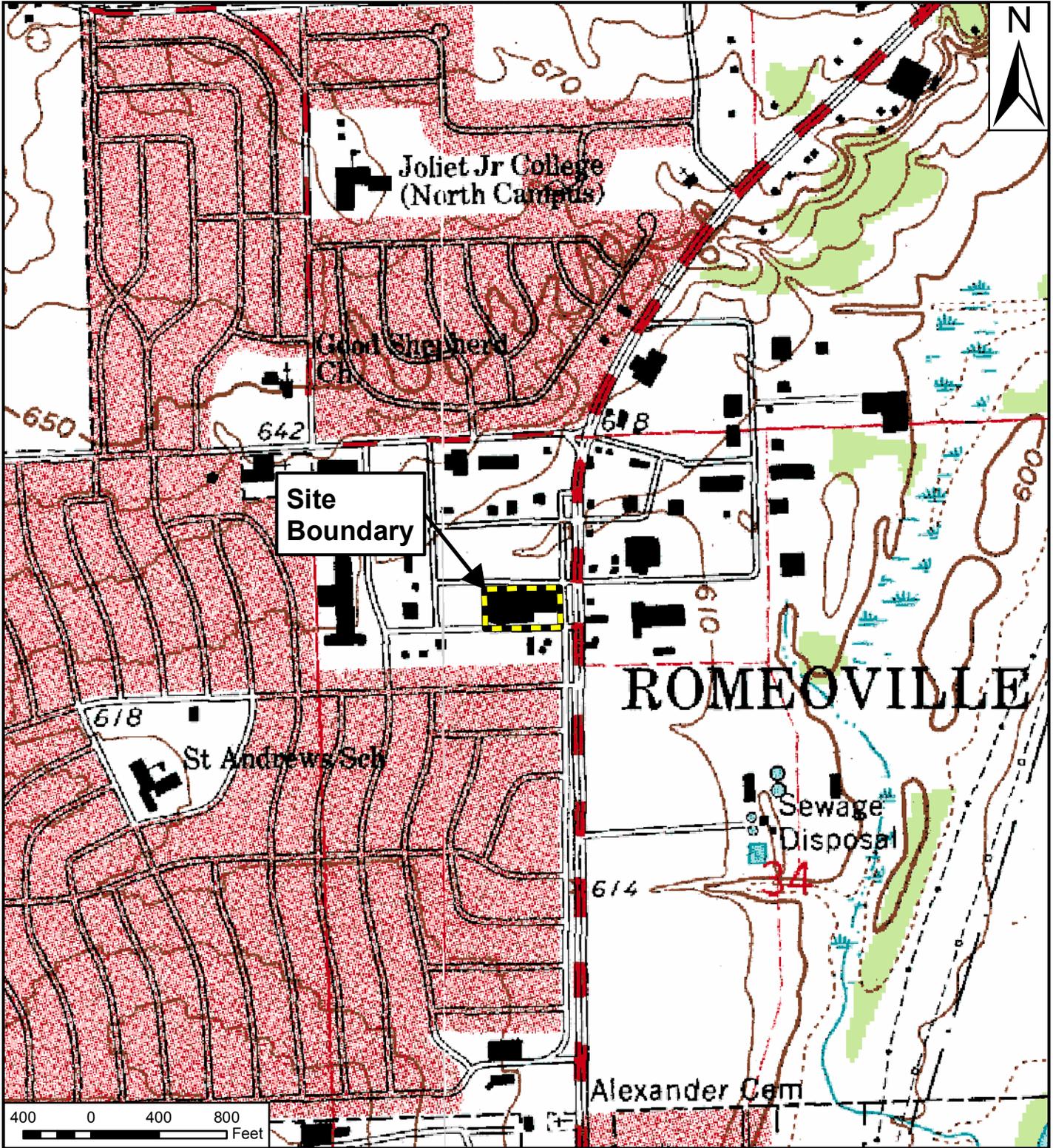
The projected remediation costs to implement and complete the cleanup project are estimated as noted in the table below.

Tasks	Estimated Costs
<i>Remediation Implementation for In-situ chemical oxidation</i>	
Contractor Bidding/Selection/Contract Execution /Mobilization Activities	\$13,600
Field Oversight/Verification Sampling/Laboratory Analysis	\$25,000
Contracted Services (Chemical oxidation treatment, labor and equipment)– 1 event)	\$ 40,000
<i>Total Remediation Activities – Estimated Cost</i>	\$78,600

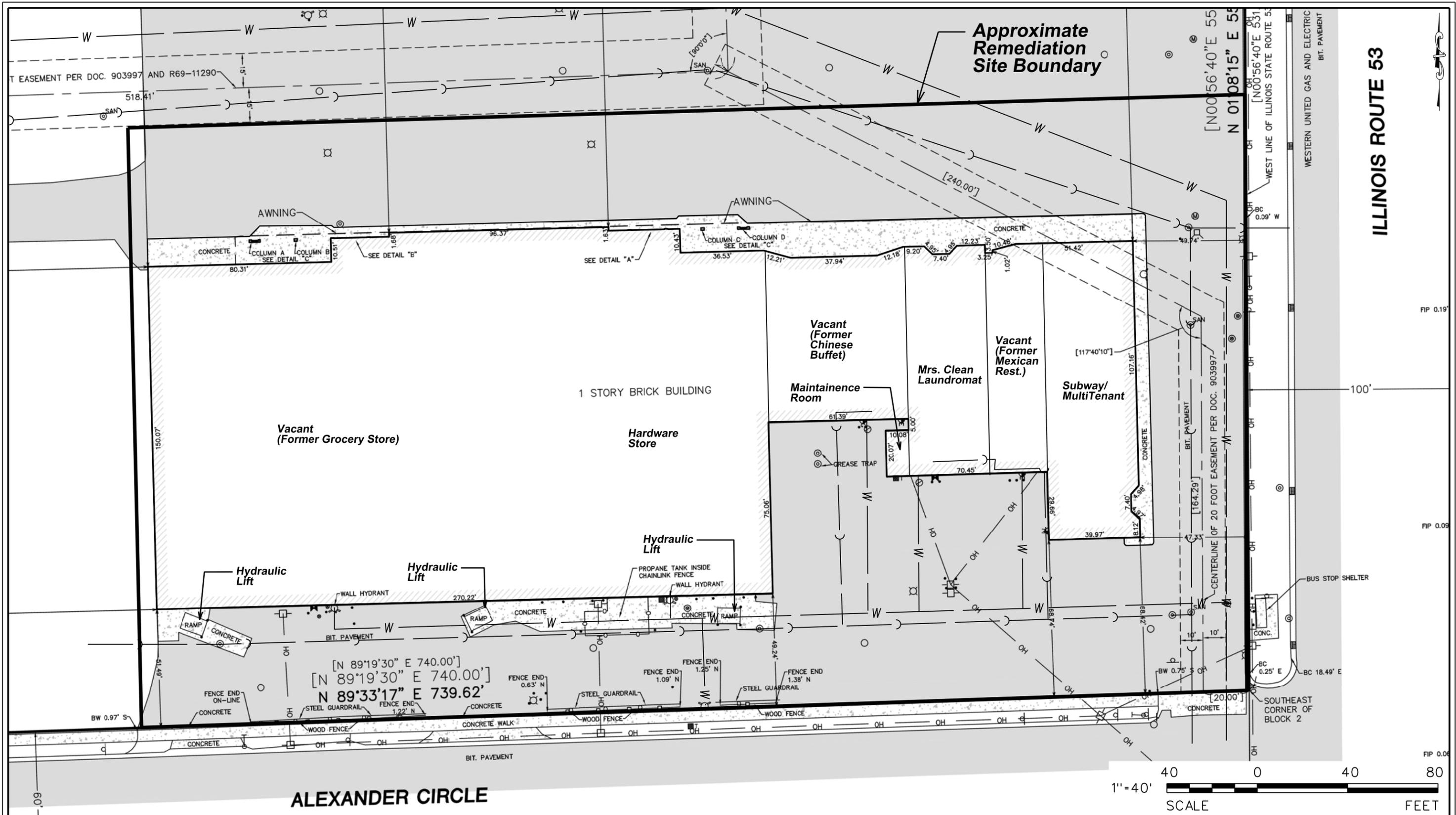
Assumes 375 cy of a limited area of impacted soil treated. Actual costs would be based upon remediation contractor bids obtained prior to implementation. The alternative costs do not include regulatory reporting requirements, programmatic and general project management, field contingencies and applicable IEPA review fees. Costs for treating all of the impacted soils to “clean” conditions or for soil removal are not included.

DECISION TO PROCEED

The Village of Romeoville has considered all the factors presented in this Decision Memorandum and has decided to proceed with the remediation activities necessary to redevelop the site. The USEPA grant resources obtained for this work will be administered in accordance with Cooperative Agreement between the USEPA and the Village of Romeoville.



 <p>V3 Companies 7325 Janes Avenue Woodridge, IL 60517 630.724.9200 phone 630.724.9202 fax www.v3co.com</p>	<p>TITLE: Site Location Map</p>		<p>PROJECT AND SITE LOCATION: Spartans' Square Shopping Center NWC Illinois Route 53 and Alexander Circle Romeoville, Illinois 60446</p>		
	<p>BASE LAYER: USGS Topographic Map (1993)</p>		<p>PROJECT No. 07292</p>	<p>FIGURE: 1.1</p>	<p>SHEET: OF: 1 1</p>
	<p>CLIENT: Village of Romeoville 13 Montrose Drive Romeoville, Illinois 60446</p>		<p>QUADRANGLE: Romeoville, IL</p>	<p>DATE: 12/04/09</p>	<p>SCALE: See Scale Bar</p>



ALEXANDER CIRCLE



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REVISIONS		
NO.	DATE	DESCRIPTION

PROJECT NO.:	07292	DESIGNED BY:	JP
FILE NAME:	FIGbase072925	DRAWN BY:	JP
DATE:	01/13/09	CHECKED BY:	RB
SCALE:	1"=40'	PROJECT MANAGER:	CM

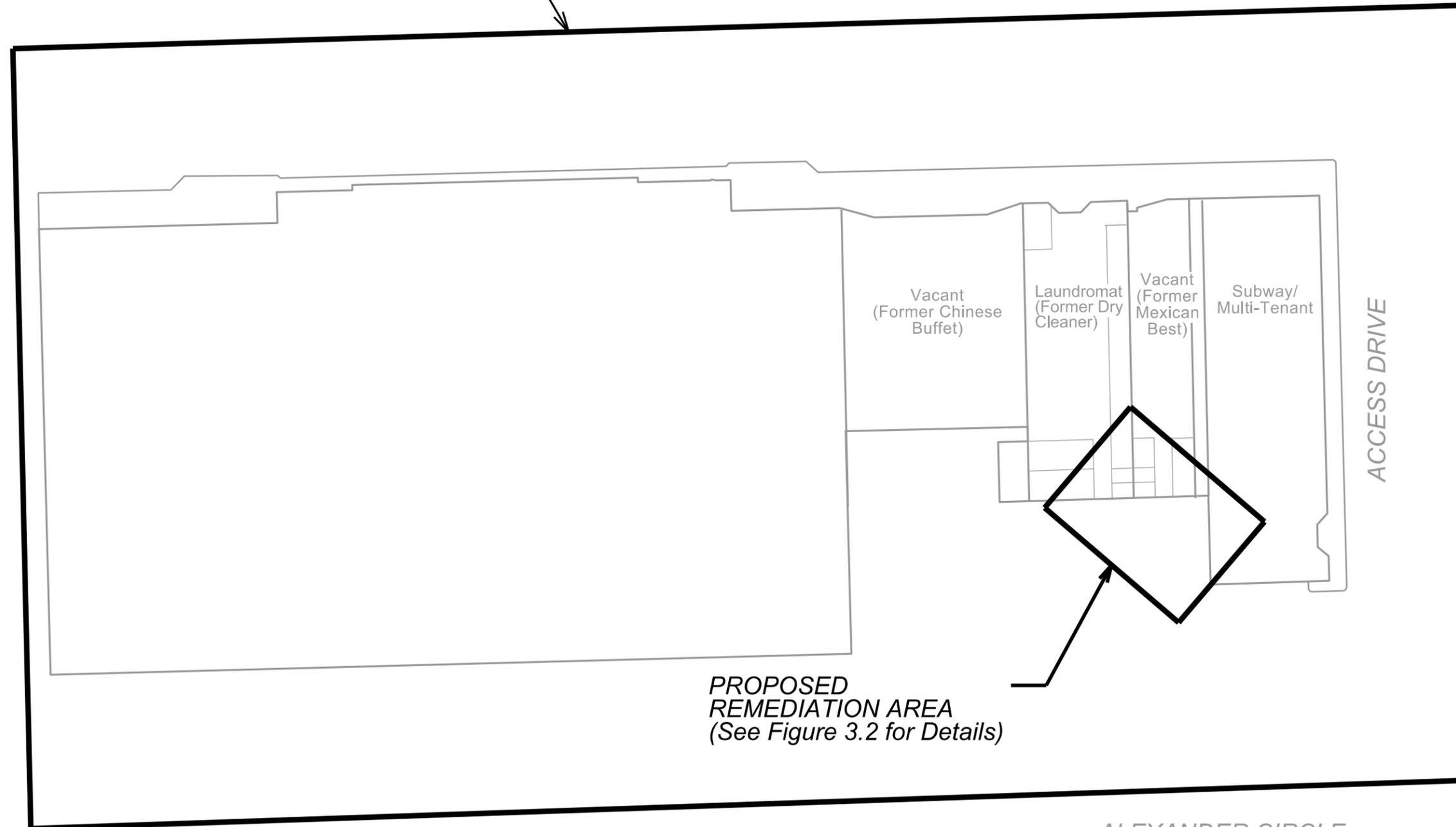
SPARTANS' SQUARE SHOPPING CENTER

ILLINOIS

SITE BASE MAP

DRAWING NO. **2.1**

REMEDIATION SITE
BOUNDARY



ILLINOIS
ROUTE 53



V3 Companies
7325 Janes Avenue
Woodridge, IL 60517
630.724.9200 phone
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REVISIONS

NO.	DATE	DESCRIPTION

PROJECT NO.: 07292	DESIGNED BY: KJW
FILE NAME: FIGpsoil_rem07292	DRAWN BY: RKB
DATE: 02/28/13	CHECKED BY: CAM
SCALE: 1"=40'	PROJECT MANAGER: CAM

SPARTANS' SQUARE
SHOPPING CENTER

PROPOSED SOIL REMEDIATION
AREA

DRAWING NO.

3.1