



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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BRUCE RAUNER, GOVERNOR

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217/782-5504

November 16, 2015

Norman and Richard Vuillaume
Norman's Cleaners and Formal Wear
17702 Oak Park Avenue
Tinley Park, Illinois 60477-3936

Refer to: 0312310009– Cook County
Orland Park/Norman's Cleaners and Formal Wear
Site Remediation Program/Technical Report

Dear Mr. Norman and Mr. Richard Villaume:

The Illinois Environmental Protection Agency (Illinois EPA) has completed review of the *Remedial Action Completion Report* (dated October 5, 2015/15-60532) submitted by E. Cooney Associates, Inc. for the Norman's Cleaners and Formal Wear site located at 17702 Oak Park Avenue in Orland Park, Illinois. The Illinois EPA disapproves of the *Remedial Action Completion Report*, please address the following comments.

1. Page 7, paragraph 1 of the *Remedial Action Completion Report* references the Focused Site Investigation (FSI) Report dated February 19, 2014. The Illinois EPA did not receive a Focused Site Investigation Report for the Norman's Cleaners and Formal Wear remediation site dated February 19, 2014; however, the Illinois EPA did receive a *Focused Site Investigation Report, Remediation Objectives Report, and Remedial Action Plan* dated March 13, 2014, and conditionally approved by the Illinois EPA on May 15, 2014. Is this the report that is referenced in the *Remedial Action Completion Report*?
2. Page 7, paragraph 1 of the *Remedial Action Completion Report* also states, in part, that, "The estimated pre-RA area is presented in Figure 1-1." Figure 1-1 is not provided with the report. Please provide Figure 1-1.
3. Page 9, paragraph 3 of the Chemical Oxidation section states, in part, that, "BAM is a proprietary additive that was developed by Orin to stabilize chlorinated

solvent impacted soils. BAM reduced the TCLP PCE concentrations to t.” Please explain what is meant by “t”.

4. Page 12, paragraph 1 of the *Remedial Action Completion Report* states, in part, that, “All sample results met the ingestion and inhalation ROs. Soil component of the”. Please complete the sentence.
5. The soil used as backfill at the remediation site was analyzed and iron was detected in concentrations exceeding the soil component of the groundwater ingestion exposure route remediation objective. The concentration of iron detected in soil sample BF7 was modeled and it was predicted that iron may model off-site 190 feet in groundwater in concentrations exceeding the groundwater remediation objective. Please address the concentrations of iron detected in the backfill soils.
6. The remediation site boundaries should be clearly defined and identified on all figures submitted with reports. Figures 1-2, 1-3, 1-4, 1-5, 1-6, and 1-7 do not include the remediation site boundaries. Please amend these figures to depict the remediation site boundaries.
7. Figure 6 submitted with the *Focused Site Investigation Report, Remediation Objectives Report, and Remedial Action Plan* dated March 13, 2014, indicated that the Trench 1 area of the remediation site would be excavated to 10 feet. Figure 1-2 Final Excavation Area and Figure 1-7 Final Excavation Depths submitted with the *Remedial Action Completion Report* do not appear to depict excavation of the Trench 1 area of the remediation site. Please address this apparent variation from the approved *Remedial Action Plan*.
8. The *Remedial Action Completion Report* proposes to exclude the indoor inhalation exposure route by including the institutional control in the No Further Remediation letter requiring any future buildings built on the remediation site to be constructed of full concrete slab-on-grade or full concrete basement floors and walls with no sumps. During the focused site investigation, perchloroethylene, trichloroethylene, and vinyl chloride were detected in groundwater in concentrations exceeding the indoor inhalation exposure route remediation objectives found in 35 Illinois Administrative Code (IAC) 742. Appendix B, Table H; therefore, the aforementioned institutional control may not be used to exclude the indoor inhalation exposure route unless, following remediation activities, the concentrations of contaminants of concern in soil gas are less than the remediation objectives found in 35 IAC 742. Appendix B, Table H or I. The approved *Remedial Action Plan* proposed to conduct soil gas sampling after soil excavation to determine if the indoor inhalation exposure route is complete following remediation activities. Additional groundwater and/or soil gas sampling is necessary to evaluate the current soil gas concentrations of contaminants at the remediation site in order to determine how to address the indoor inhalation exposure route.

If you have any questions regarding these comments, I may be contacted at (217) 782-5504 or by e-mail at barb.conner@illinois.gov.

Sincerely,

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Barbara Conner
Voluntary Site Remediation Unit
Remedial Project Management Section
Division of Remediation Management
Bureau of Land

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Bureau of Land File