United States Environmental Protection Agency

Success Story

Celotex Corporation

Celotex Corporation Site

Chicago, Illinois

February 2016

FINAL

U.S. EPA Region 5

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Executive Summary

Once a contaminated industrial property, the Celotex Corporation Superfund site (the site) is now a valued community park in Chicago's Little Village neighborhood. For years, the Celotex Corporation, along with other prior companies, produced, stored and sold asphalt roofing products on site, contaminating soils and materials with coal tar. After discovery of the contamination, U.S. EPA (EPA) and Illinois Environmental Protection Agency (IEPA) worked with the company on the site's cleanup. By late 1993, all buildings and visibly polluted soils and materials had been removed. In 2002, Sacramento Corporation acquired the site property and enhanced the remedy, placing 2 feet of gravel over 22 acres. This made sure that site soils would not wash onto nearby properties during heavy rains.

Figure 1. Site Vicinity Map

With the site's remedy in place, attention shifted to potential redevelopment opportunities. In 2008, the Chicago Park District and the City of Chicago prioritized the area for reuse as a community resource. Collaboration led to remarkable outcomes. The City and Chicago Park District worked closely with the Little Village Environmental Justice Organization (LVEJO) and coordinated with EPA and IEPA on plans for a 22-acre park. LVEJO and area residents provided feedback on design ideas and chose "La Villita Park" as the facility's name.

A ribbon-cutting ceremony in December 2014 celebrated the park's opening and recognized the community-led collaborative effort that made the site's reuse possible. Park features include two artificial turf athletic fields, three natural grass fields, a skate park, basketball courts, gardens, a playground with water features, a picnic pavilion, a small office for staff and a multi-use trail with fitness stations.

Introduction

When community members first discovered contamination near the Celotex Corporation property, they likely could not envision that the polluted site would one day be a treasured local park. Located in Chicago's Little Village neighborhood, the site includes the 22-acre Main Site and the 2-acre Former Asphalt Plant. More than 70 years of industrial activities and processing coal tar products resulted in contamination of site soils and surrounding residential yards. Beginning in 1989, citizen action prompted IEPA to start site inspections, which led to the discovery of the contamination.

Over the next 20 years, the site was cleaned up and transformed into Chicago's newest public park. This document tells the story of how the Superfund cleanup process combined with local government leadership and community collaboration led to development of La Villita Park in Chicago's Little Village neighborhood.

Site History

From 1911 to 1982, five companies – Allied Signal, Allied Chemical and Dye Corporation, Barrett Paving, Monarch Asphalt Company, and the Celotex Corporation – operated industrial facilities at the site. They produced coal tar, asphalt and roofing products. Most recently, the Celotex Corporation operated a roofing products facility on the majority of the 22-acre property (Main Site). Barrett Paving operated a separate Former Asphalt Plant on a 2-acre property south of the Main Site.

In 1979, Barrett Paving transferred operations to Monarch Asphalt Company, who dismantled the asphalt plant shortly after acquiring the property. Celotex ceased operations in 1982.

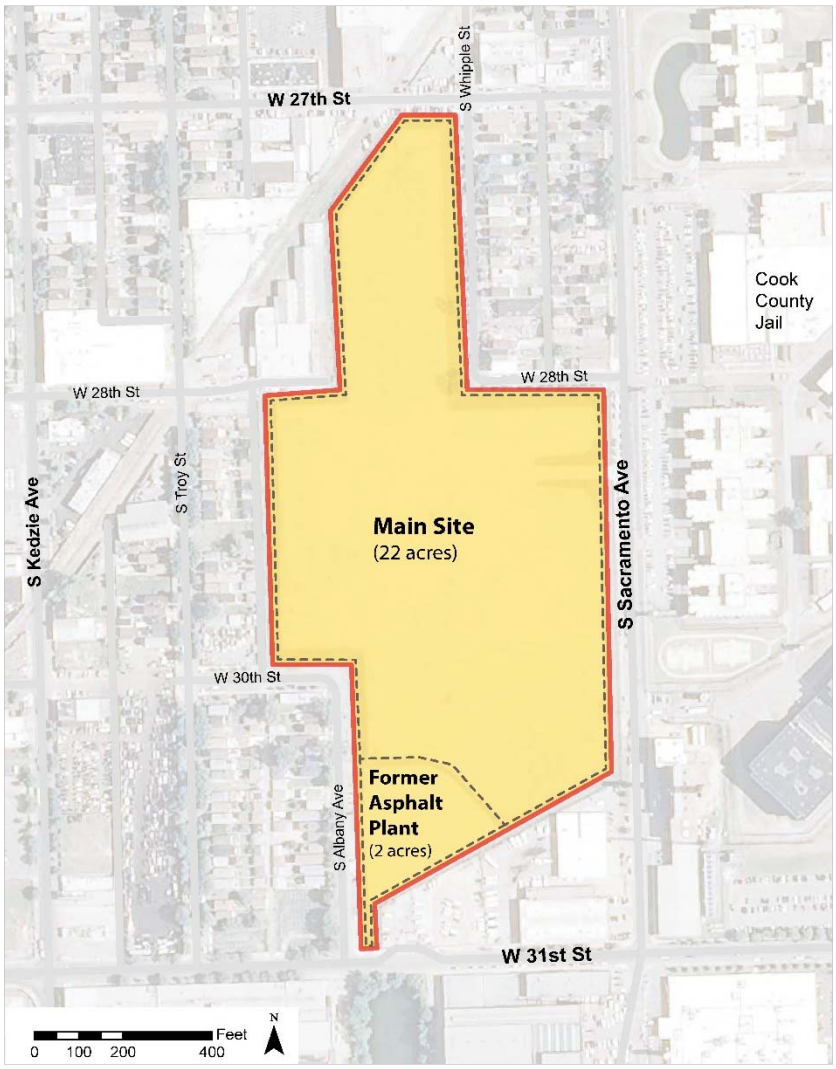


Figure 2. Site Detail Map

Citizen Discovery

In 1989, LVEJO (LVEJO was formally the Gary School Env. Justice Project in 1989) and citizens notified IEPA about the presence of coal tar on the Main Site. In addition, lack of soil cover and heavy rains frequently caused runoff onto residential properties on Troy Street next to the site. That same year, IEPA initiated site inspections. IEPA released a preliminary assessment report in 1992 that confirmed the presence of contamination at the site and showed that the contamination warranted cleanup under EPA's Superfund program.

In 1993, Celotex dismantled the manufacturing facilities and subsequently removed visible contaminated soils, placed 2 feet of gravel over most of the 22-acre Main Site and replaced the on-site drainage system that had previously directed stormwater during flood events to nearby residential areas. Celotex then sold the Main Site and Former Asphalt Plant to Sacramento Ave. Corporation, a trucking company, in 2002. Sacramento Ave. Corporation continued to use the area for trailer parking and trucking operations until the City of Chicago acquired the site in 2011.

Cleanup Process

From 1995 to 2005, EPA worked with the site's potentially responsible parties, state and federal agencies, and community members to develop the cleanup approach for the site. This section briefly summarizes that process as well as the site's contaminants of concern, cleanup activities and institutional controls (legal restrictions).

In 1995, EPA started negotiations with the potentially responsible parties to further evaluate the contamination and determine appropriate response actions to ensure the protection of public health and the environment.

EPA and potentially responsible party Honeywell (successor to Celotex, Allied Signal and Allied Chemical and Dye) signed an Administrative Order on Consent in 1996 requiring Honeywell to conduct an Engineering Evaluation and Cost Analysis for the Main Site and residential areas under EPA's Superfund Removal program.

Site History Timeline

1989: IEPA receives complaints from residents and begins site investigations.

1992: Preliminary site assessment completed.

1993: EPA involvement begins.

1995: Interim actions address stormwater runoff.

1996: Honeywell and EPA enter into agreement for evaluation of cleanup options.

2002: Sacramento Ave. Corporation acquires site.

2004: EPA proposes cleanup plan.

2008: Residential soil cleanup complete.

2009: Main Site cleanup complete.

2011: City of Chicago acquires property.

2012: Property transfers to Chicago Park District.

A 1997 Data Report for the Engineering Evaluation and Cost Analysis identified the following contaminants of concern at the site:

- Volatile organic compounds and polycyclic aromatic hydrocarbons (PAHs) at the Main Site in surface soils and subsurface soils at depths ranging from 0 to 18 feet.
- PAHs in residential areas northeast of the site.

The Agency for Toxic Substances and Disease Registry (ATSDR) released a supplemental Health Consultation report for the Site. It recommended that EPA clean up contaminated soil to reduce potential for exposure and that residents in affected areas take steps to reduce exposure to PAHs in soil by maintaining grass cover in yards. Following several years of interagency discussions, EPA and Honeywell presented the results of the Engineering Evaluation and Cost Analysis and a draft proposed cleanup plan to the public in September 2004.

EPA shared the draft Proposed Plan with the community at a public meeting in September 2004. Following significant community comments on the draft Proposed Plan, EPA issued an Action Memorandum in 2005 outlining the response actions above, including additional residential yard sampling.

Between 2006 and 2009, Honeywell completed the removal actions outlined in the 2005 Action Memorandum, addressing contamination on the main site and in residential areas.

- *Residential Area Removal Actions*: Between 2006 and 2008, the potentially responsible parties and EPA sampled soils and met with property owners to discuss residential yard cleanup and landscape restoration. Honeywell excavated 14,000 tons of nonhazardous soil from 32 residential properties and transported the material off site for landfill disposal. Clean fill was used to backfill excavated residential yards and parkway buffer areas. The areas were then landscaped to pre-removal conditions.

- *Main Site Removal Action:* From 2008 to 2009, Honeywell completed several removal actions, including excavation and off-site disposal of 16,301 tons of contaminated soil, removal and off-site disposal of 52,250 gallons of liquid waste, placement of additional gravel cover across the Main Site, and placement of 2 feet of clay fill as cover across the Former Asphalt Plant. Perimeter fencing was installed after completion of the removal actions.

- *Institutional Controls:* EPA required use restrictions to limit disturbance of gravel cover without prior approval from the Agency, and to prevent future residential, commercial lodgings or daycare uses at the site. To

Proposed Cleanup Plan

The Proposed Plan outlined several removal response actions to address contamination at the Main Site and at 32 residential properties:

- Placement of 2 feet of gravel fill across the 22-acre Main Site.
- Placement of 2 feet of clay cover on the 2-acre Former Asphalt Plant Site.
- Removal of soils from residential areas with PAH concentrations greater than 10 parts per million.

ensure that the site remains safe for future uses, soil handling and maintenance plans are required for any construction that would modify the clay and gravel covers.

Removal actions at the Main Site and residential areas finished by 2009, ensuring the safety of neighborhood residents and the environment.

Community Collaboration

Throughout the cleanup and reuse process, LVEJO, the City of Chicago, the Chicago Park District (Park District), EPA and IEPA collaborated effectively to address potential exposure risks, implement cleanup, address liability concerns and create a valuable opportunity for public park access. The section below highlights the components of this successful partnership in greater detail.

Over the past 15 years, the efforts of LVEJO and community members were essential in advocating for agency involvement, cleanup and community-based reuse. LVEJO was among the first organizations to identify the site's public health impacts on neighborhood residents. Through their work with local youth, LVEJO discovered a pattern of stories among the community describing contact with water from basement flooding after rainstorms that caused rashes and skin ailments. This prompted LVEJO to contact the Illinois Department of the Environment. In turn, this led to IEPA beginning preliminary site inspections and investigations. Later, when EPA shared the site's draft Proposed Plan for public comment, LVEJO and many community members advocated for additional soil sampling and asked for consideration of a more stringent residential soil cleanup standard. Nefertiti DiCosmo, EPA's former project manager for the site, noted that "throughout the process, the community has been instrumental in getting the site cleaned up."

EPA and Honeywell listened to community concerns and responded with an updated cleanup approach. After completing site investigations and evaluating cleanup options, Honeywell and EPA reached agreement on a preferred cleanup approach outlined in the site's 2004 draft Proposed Plan. LVEJO initially raised concerns about the cleanup approach for the Main Site and residential areas. Community members were concerned that proposed cleanup goals for contaminated soils in residential yards would not be sufficiently protective of public health. Working in collaboration with EPA and LVEJO, Honeywell provided community involvement staff and hired a Spanish-speaking representative to assist the site team in meetings with residential property owners. The site team met with each resident to explain how the removal action would affect each property. Based on these discussions and additional sampling, Honeywell was able to satisfy community members' public health concerns, proceed with the cleanup and restore residential yards with new landscaping. EPA's project manager for the site, noted that Honeywell's involvement helped facilitate the cleanup and redevelopment process by proactively addressing citizen concerns.

Residential yard sampling by Honeywell prior to removal actions in 2006.

Leadership

La Villita Park would not have been possible without significant contributions and investment of time, energy and resources from the community, City of Chicago and the Chicago Park District. The City of Chicago took on the challenge of acquiring the property and working with EPA to address potential liability concerns, while LVEJO led an innovative park design process to inform the Chicago Park District's plan for a new park. The three entities responded to community needs, prioritized investment in the neighborhood, and collaborated effectively with EPA and community residents to turn park plans into reality.

Building on years of citizen action focused on addressing contamination concerns, residents of the Little Village neighborhood and LVEJO began to look at the site as an opportunity to improve quality of life for residents in a community with limited recreation resources. LVEJO started working with local elected officials and staff from the City of Chicago and the Chicago Park District, advocating for a new park in the Little Village neighborhood. LVEJO's Kim Wasserman noted that community advocacy was critical at this stage. She noted "School teams were going to the Park District to advocate for a park in the neighborhood."

Alderman George Cardenas, who represents Chicago's 12th Ward, recognized Little Village community interests and needs, advocated for a new park in the neighborhood, and became a champion of the site's reuse and park development. He saw that a park at the site could provide major community benefits.

The Chicago Park District confirmed that the Little Village neighborhood lacked adequate parkland. Based on a target of 2 acres of parkland for every 1,000 residents, the South Lawndale Community Area – which encompasses the site and Little Village – had a park deficit of almost 80 acres. Given the site's size and location in a priority neighborhood for new park space, the City began looking at ways to acquire the property. With support from elected officials and community residents, the City entered into discussions with the site owner (Sacramento Avenue Corporation). After several years of negotiations, the City exercised its authority to acquire property for public use as part of the South Lawndale Community Redevelopment Area in 2011. Following a settlement with Sacramento Avenue Corporation, the City acquired 24 acres at the site for $7.5 million.

Alderman George Cardenas addresses community members celebrating the opening of La Villita Park in December 2014.

Liability Protections

As a condition of the acquisition, the City needed assurances for liability protections that would enable the municipality and the Chicago Park District to invest in a large-scale park development process. Through a collaborative effort among the City of Chicago Legal Department, the U.S. Department of Justice (DOJ) and EPA, the City obtained a Prospective Purchaser Agreement (PPA) that included a Superfund liability release and a covenant not to sue from DOJ. EPA Region 5's Office of Regional Counsel and City of Chicago attorneys identified settlement terms to ensure that the Chicago Park District would serve as a reliable long-term steward of the site and its remedy. Agreements also stipulated that the Park District would use sustainable development approaches in developing a new park. According to Lisa Misher, attorney in the City of Chicago's Legal Department, "the acquisition of the site would not have been possible without EPA's work on the PPA." In 2012, the City transferred ownership of the 24-acre property to the Park District.

EPA's ER3 Initiative

In 2009, EPA entered into a Prospective Purchaser Agreement (PPA) with City of Chicago and the Chicago Park District at the site as part of the Agency's Environmentally Responsible Redevelopment and Reuse (ER3) Initiative, which offers incentives for sustainable reuse projects through EPA's Office of Enforcement.

EPA considers entering into a PPA under limited circumstances, such as situations where a new use offers significant environmental benefits and a there is a significant need for a PPA to advance the project. City of Chicago staff credit successful collaboration with EPA and DOJ in developing the PPA as a critical component of site's reuse.

Park Design Process

As the City worked to acquire the site property, LVEJO sponsored a design process that included conducting community surveys and convening stakeholder meetings to identify the community's needs and recreation goals. Once the land was acquired, the Chicago Park District designed models of the park and adapted them based on feedback from the community.

LVEJO's park design activities engaged neighborhood residents and youth.

Throughout the process, community members expressed concerns about whether the site would be safe for future park use. EPA, the Chicago Park District and the contractor worked together on the site's Contaminated Soil and Engineered Barrier Management Plan. The plan, prepared in 2012, guided construction activities necessary to implement park reuse consistent with final cleanup and institutional controls. This roadmap included stringent construction requirements to make sure park improvements were compatible with the site's remedy. The plan also outlined maintenance obligations for park operations after construction.

The Chicago Park District collaborated with EPA to determine the feasibility of integrating various park features with site cleanup restrictions. According to the Park District's Daniel Cooper, "initially, the community wanted a swimming pool in the park, but the Park District was limited on what it could build on the property without disturbing the soil cap that protected the release of contaminants. The Park District worked hard to ensure that the community was informed about what kinds of redevelopment limitations the park had." This collaborative design process between the Park District and community members moved the project forward. In August 2012, the community approved of the park's initial design. LVEJO's Director of Organizing and Strategy Kim Wasserman underscored the importance of community involvement throughout the process, emphasizing that "you need the community to have a stake in the project." She noted that the park's final design encompassed many of the community's priorities.

In the final stage of the design process, LVEJO led a collaborative process to identify an appropriate name for the new park. LVEJO held several community meetings to gather ideas and then engaged more than 700 residents via an online survey. The outcome was a strong consensus for selecting La Villita Park as the name of the City's newest recreation resource. The name acknowledges the vitality of the area's diverse neighborhoods as well as the contributions that Mexican immigrants and Mexican Americans have made to the Little Village neighborhood.

The Park District sponsored a design process that included models of potential design options, such as the playground features shown above, to illustrate reuse options during the park design process.

La Villita Park Today

In December 2014, the Park District opened the City's newest park. La Villita Park responds to the community's vision for a vibrant multi-use park, encompassing a wide range of recreation options, including:

- Natural grass and turf soccer fields
- Basketball courts
- Skate park
- Playground and splash park
- Picnic pavilion
- Walking trail and fitness stations

La Villita Park is accessible to pedestrians from 27th Street (north entrance) and 31st Street (south entrance). From the 27th Street entrance, paths guide visitors to two basketball courts, a skate park and a naturally landscaped playground and splash pad. A picnic pavilion and rest room facilities are centrally located. Central and southern portions of the park host two turf athletic fields with lighting and two natural grass, multi-purpose athletic fields. Walking trails, including a fitness loop with exercise stations, circle around the perimeter of the athletic fields. Vehicle access from South Albany Street leads to a parking area with direct access to the sports fields.

Playground

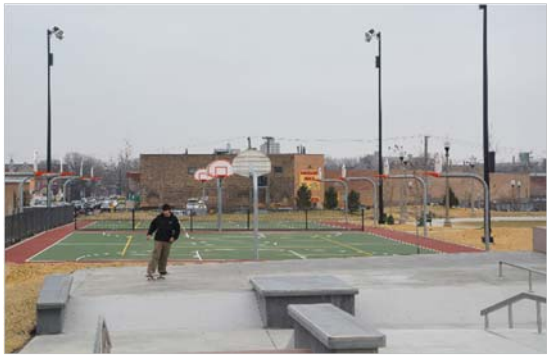
Figure 3. La Villita Park Layout Map

Outcomes of the Reuse Process

Although the cleanup and redevelopment process was a long journey, the outcomes today benefit the community and the environment.

Long-Term Stewardship

The Chicago Park District is responsible for the site's long-term stewardship as well as regular maintenance of La Villita Park. The city government's presence at the site provides certainty for EPA that a responsible entity is in place to help monitor the site. The Park District's investment in the site has created a valuable amenity that community members are proud to have in the neighborhood. Since park planning started, community perspectives have been a vital part of all phases of the process. Community members have been involved in the design and naming of the park and are involved in the on-going development of park programming. EPA community involvement coordinator Heriberto Leon highlighted these sentiments, stating that "the community's experience with the cleanup and construction of the park will give the neighborhood a sense of ownership." To ensure that the new park maintained robust programming in its inaugural summer and that neighborhood residents were aware and involved in park programming, the Chicago Park District and LVEJO partnered together to launch the Keep La Villita Park Safe and Beautiful Pilot Program.



Skate park and basketball courts

Artificial turf soccer field

Community members celebrate design of La Villita Park.

This groundbreaking program identified four strategies to ensure park safety and meaningful community engagement thru: Police/Community Relations, Robust Sports and Arts Programming, Mi Parque Recycling and Zero Waste Volunteer Program and Consistent Community Outreach to Nearby Residents and Schools to Ensure Program Participation.

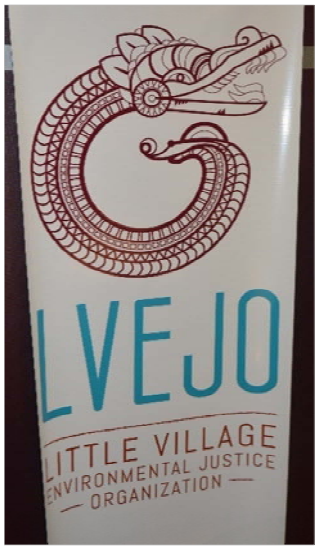
Under the leadership of LVEJO, the pilot program was successfully planned and introduced to the community. During the summer LVEJO staff established relationships with nearby schools and community organizations, and worked through the new Park Advisory Council and social media to share information about the new park and available programming. In addition, LVEJO identified community and youth leaders, and organized a formal volunteer program to train the leaders to address conflict and perform park cleanups.

Through dedicated community outreach and the inclusion of community residents, schools and organizations in discussions about the new park, LVEJO and the Chicago Park District successfully increased safety in the new park, and navigated the challenges that emerged with a new park opening.

La Villita Park is a source of community pride for neiahborhood residents.

Environmental Justice

The site's reuse provides a much-needed community resource for the environmentally overburdened and underserved Little Village neighborhood and Chicago's South Lawndale Community Area. Prior to the site's acquisition and development of La Villita Park, the South Lawndale Community Area had an open space deficit of nearly 80 acres and ranked second out of 77 community areas in need for open space. The site's redevelopment has increased park acres and created new opportunities for sports, play and social interaction. This is the only park in the area where playgrounds, sports fields and basketball courts are all in one location. In addition, the park has one of the largest playgrounds in the city, while the community area in the northern part of the park serves as a space for farmers markets, festivals and other community events. Kim Wasserman from LVEJO noted that, in addition to the green space, the park has improved local quality of life, observing that "our community is becoming healthier as a result of this park." Collaboration, cleanup and reuse have transformed a site that was once an environmental and public health liability into a highly valued community asset.



At La Villita Park's ribbon cutting ceremony in December 2014, Chicago Mayor Rahm Emanuel noted that the park now serves over 6,000 children ages six or under within a 10-minute walk of the park. Many of these children previously did not have easy access to a park or recreation facilities.