

**HAZARDOUS, TOXIC, AND RADIOACTIVE WASTE (HTRW)
PHASE I ENVIRONMENTAL SITE ASSESSMENT
NORTHERN ILLINOIS COASTAL COMMUNITIES SECTION 1122 PROJECT
COOK AND LAKE COUNTY, ILLINOIS**

Hydraulics and Environmental Engineering Section (TS-DH)
US Army Corps of Engineers, Chicago District

July 2020

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- Attachment 1. Historical Aerial Photographs
- Attachment 2. Site Visit Photographs

1 INTRODUCTION

The purpose of this report is to discuss the hazardous, toxic, and radioactive waste (HTRW) assessments for the proposed project identified in the Northern IL Coastal Communities Section 1122 Beach Nourishment Detailed Project Report. This HTRW investigation identifies both HTRW and non-HTRW environmental issues and presents appropriate measures to resolve these issues. The methods used in performing the investigation are described in detail. Conclusions and recommendations regarding potential impacts due to HTRW and non-HTRW issues associated with project sites are provided.

2 AUTHORITY

2.1 USACE HTRW Policy

Engineer Regulation (ER) 1165-2-132, Hazardous, Toxic, and Radioactive Waste (HTRW) Guidance for Civil Works projects, dated June 26, 1992, provides guidance for consideration of HTRW issues and problems within project boundaries or which may affect/be affected by Corps Civil Works projects. The ER states the Corps policy for addressing HTRW issues and outlines the timing and cost sharing requirements for HTRW encountered during the standard Civil Works project phases. Goals of the ER are to identify the level of detail for HTRW investigation for each phase of a civil works project, promote early detection and response by appropriate responsible parties, determine viable options to avoid HTRW problems, and establish a mechanism for resolution of HTRW issues. The Corps policy provides the following:

- Civil works funds are not be used for HTRW related activities except as specifically stated in the policy or provided for specifically in law (see paragraph 6a, ER 1165-2-132).
- Construction of civil works projects should be avoided in HTRW contaminated areas, where practicable.
- The Corps and project sponsor will cost share environmental investigations to identify existence of HTRW (see paragraph 6b, ER 1165-2-132).
- If not practicable to avoid HTRW for a project, the sponsor is responsible for ensuring that development and execution of HTRW response actions are accomplished at 100% sponsor provided cost.

2.2 HTRW – Local Sponsor Responsibilities

The sponsor is responsible for all costs associated with the required response of any known or unknown HTRW contamination existing at the project throughout all project phases. The sponsor is also 100% responsible for all costs associated with the required response plan and for ensuring that response actions are accomplished in accordance with federal, state and local

environmental laws. No in-kind project cost credit will be given to the sponsor for these activities.

2.3 HTRW Guidance

ER 1165-2-132 requires that a site investigation be conducted as early as possible to identify and evaluate potential HTRW problems. According to ER 1165-2-132, non-HTRW issues that do not comply with the federal, state, and local regulations should be discussed in the HTRW investigation along with HTRW issues. This HTRW investigation is conducted during the feasibility phase of the project. In general, HTRW Phase I ESAs should rely on existing information, observations made through database research, an aerial photograph, topographic map, and historical document review, a site visit, and information provided by the local sponsor.

As stated in the ER-1165-2-132 an initial assessment as appropriate for Reconnaissance Study should be conducted as a first priority for projects with no prior HTRW consideration. If the initial assessment indicated the potential for HTRW, testing, as warranted, and analysis similar to a Feasibility Study, or Phase II Environmental Site Assessment (ESA), should be conducted prior to proceeding with the project design.

3 DEFINITIONS

3.1 Hazardous, Toxic, and Radioactive Waste

The objective of ER 1165-2-132 is to outline procedures to facilitate early identification and appropriate consideration of HTRW. This investigation, therefore, identifies potential HTRW and discusses resolutions and/or provides recommendations regarding the HTRW identified. Except for dredged material and sediments beneath navigable waters proposed for dredging, for purposes of this guidance, HTRW includes any material listed as a "hazardous substance" under the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9601 et seq (CERCLA). (See 42 U.S.C. 9601(14).) Hazardous substances regulated under CERCLA include "hazardous wastes" under Sec. 3001 of the Resource Conservation and Recovery Act, 42 U.S.C. 6921 et seq; "hazardous substances" identified under Section 311 of the Clean Air Act, 33 U.S.C. 1321, "toxic pollutants" designated under Section 307 of the Clean Water Act, 33 U.S.C. 1317, "hazardous air pollutants" designated under Section 112 of the Clean Air Act, 42 U.S.C. 7412; and "imminently hazardous chemical substances or mixtures" on which EPA has taken action under Section 7 of the Toxic Substance Control Act, 15 U.S.C. 2606; these do not include petroleum or natural gas unless already included in the above categories. (See 42 U.S.C. 9601(14).)

3.2 Non-Hazardous, Toxic, and Radioactive Waste

According to ER 1165-2-132, non-HTRW environmental issues that do not comply with federal, state, and local regulations should be discussed in the HTRW investigation along with HTRW. For example, solid waste is a non-HTRW issue considered. Petroleum releases from Leaking Underground Storage Tanks (LUSTs) are not considered HTRW but are regulated. These sites have the potential to impose environmental hazards. Non-HTRW issues identified during the

investigation are also discussed in this report, along with resolutions and/or recommendations for resolution.

3.3 Recognized Environmental Condition

For the purposes of this investigation, the term REC may be used interchangeably with HTRW to identify a potential HTRW or non-HTRW environmental issue. ASTM defines a recognized environmental condition (REC) as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions.

4 GUIDANCE

Supplemental guidance is provided by the Standard Practice for Environmental Assessments: Phase I Environmental Site Assessment Process (Designation: E 1527-13) prepared by the American Society for Testing of Materials (ASTM). The purpose of this guidance is to define good commercial and customary practice in the United States of America for conducting an environmental site assessment of a parcel of commercial real estate with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. §9601) and petroleum products. These standards recommend that an environmental assessment include a records review, site visit, interviews, and report preparation.

5 LAWS AND REGULATIONS

5.1 Federal

The definition of HTRW according to ER 1165-2-132, page 1, paragraph 4(a) is as follows: “Except for dredged material and sediments beneath navigable waters proposed for dredging, for purposes of this guidance, HTRW includes any material listed as ‘hazardous substance’ under the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9601 et seq (CERCLA). (See 42 U.S.C. 9601(14).) Hazardous substances regulated under CERCLA include ‘hazardous wastes’ under Sec. 3001 of the Resource Conservation and Recovery Act, 42 U.S.C. 6921 et seq; ‘hazardous substances’ identified under Section 311 of the Clean Air Act, 33 U.S.C. 1321, ‘toxic pollutants’ designated under Section 307 of the Clean Water Act, 33 U.S.C. 1317, ‘hazardous air pollutants’ designated under Section 112 of the Clean Air Act 42 U.S.C. 7412; and ‘imminently hazardous chemical substances or mixtures’ on which EPA has taken action under Section 7 of the Toxic Substance Control Act, 15 U.S.C. 2606; these do not include petroleum or natural gas unless already included in the above categories. (See 42 U.S.C. 9601(14).)” As noted in 42 U.S.C. 9601(14), the term “hazardous substance” does not include crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance, nor does the term include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel. Underground storage tanks (USTs) are federally regulated

under 40 CFR Part 280, which includes technical standards and corrective action requirements for owners and operators of USTs.

5.2 State

The Illinois State regulations were examined to determine which regulations governed the state specific hazardous waste disposal, release, and cleanup requirements. Illinois regulates USTs under Illinois Administrative Code, Title 35, Subtitle G, Chapter I, Subchapter D, Part 731, Underground Storage Tanks. The definition of a regulated substance under this regulation means any “hazardous substance” or “petroleum”. Hazardous substance UST is defined as an UST system that contains a “hazardous substance”, or any mixture of “hazardous substances” and “petroleum” which is not a petroleum UST system. Petroleum UST means any UST system that contains petroleum or a mixture of petroleum with minimal quantities of other regulated substances.

Owners and operators of petroleum or hazardous substance UST systems must comply with the requirements of Part 731 except for USTs excluded under Section 731.110(b) and UST systems subject to RCRA corrective action requirements under 35 Ill. Adm. Code 724.200, 724.296, 725.296, or 725 Subpart G. Other Illinois hazardous waste regulations included in 35 Illinois Administrative Code Subtitle G, Chapter I, Waste Disposal include Subchapter b, Permits; Subchapter c, Hazardous Waste Operating Requirements; Subchapter d, Part 738, Hazardous Waste Injection Restrictions; Subchapter e, Specific Hazardous Waste Management Standards; and Subchapter h, Illinois “Superfund” Program.

6 SITE DESCRIPTION

The study area is divided into 6 beaches located along approximately 54,560 yards of Lake Michigan shoreline in the communities of Lake Bluff, Glencoe, North Chicago, and Evanston, in Cook and Lake County, Illinois (see **Figures 1-6**).

The study area consists of: Sunrise Park and Beach in Lake Bluff, Foss Park in North Chicago, Glencoe Beach in Glencoe, Dog Beach in Evanston, Greenwood Street Beach in Evanston, and Lee Street Beach in Evanston. Study area parcels are owned by the Lake Bluff Park District, the Foss Park District, the Glencoe Park District, and the City of Evanston, respectively. Sunrise Park and Beach and Glencoe Beach are directly adjacent to single-family residential areas. Greenwood Street Beach, Lee Street Beach, and Dog Beach are adjacent to a park with grassy areas with some trees, past which begins single-family residential development. Foss Park is adjacent to a moderately vegetated area with some industry.

Figure 3: Glencoe Beach in Glencoe

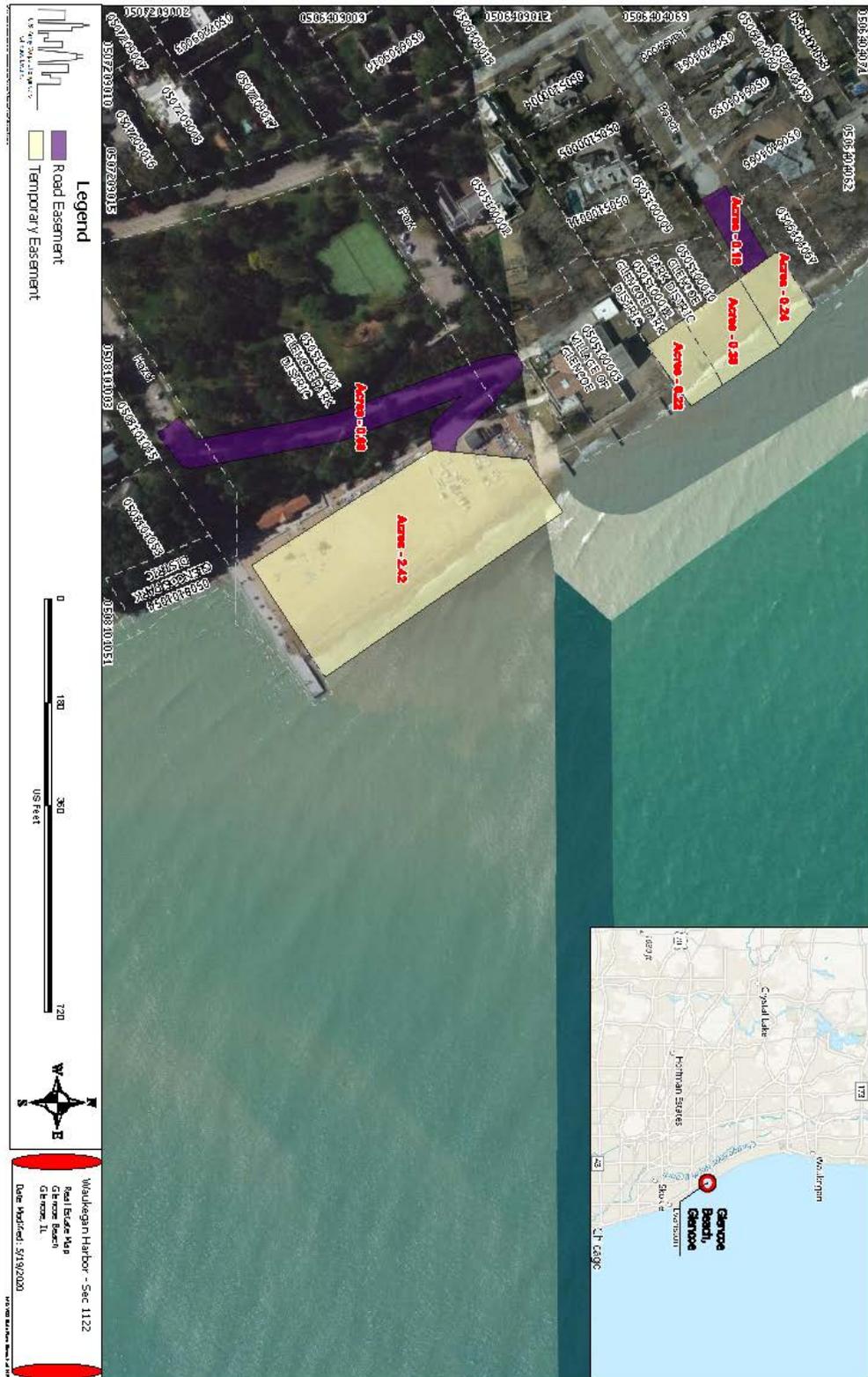


Figure 4: Dog Beach in Evanston

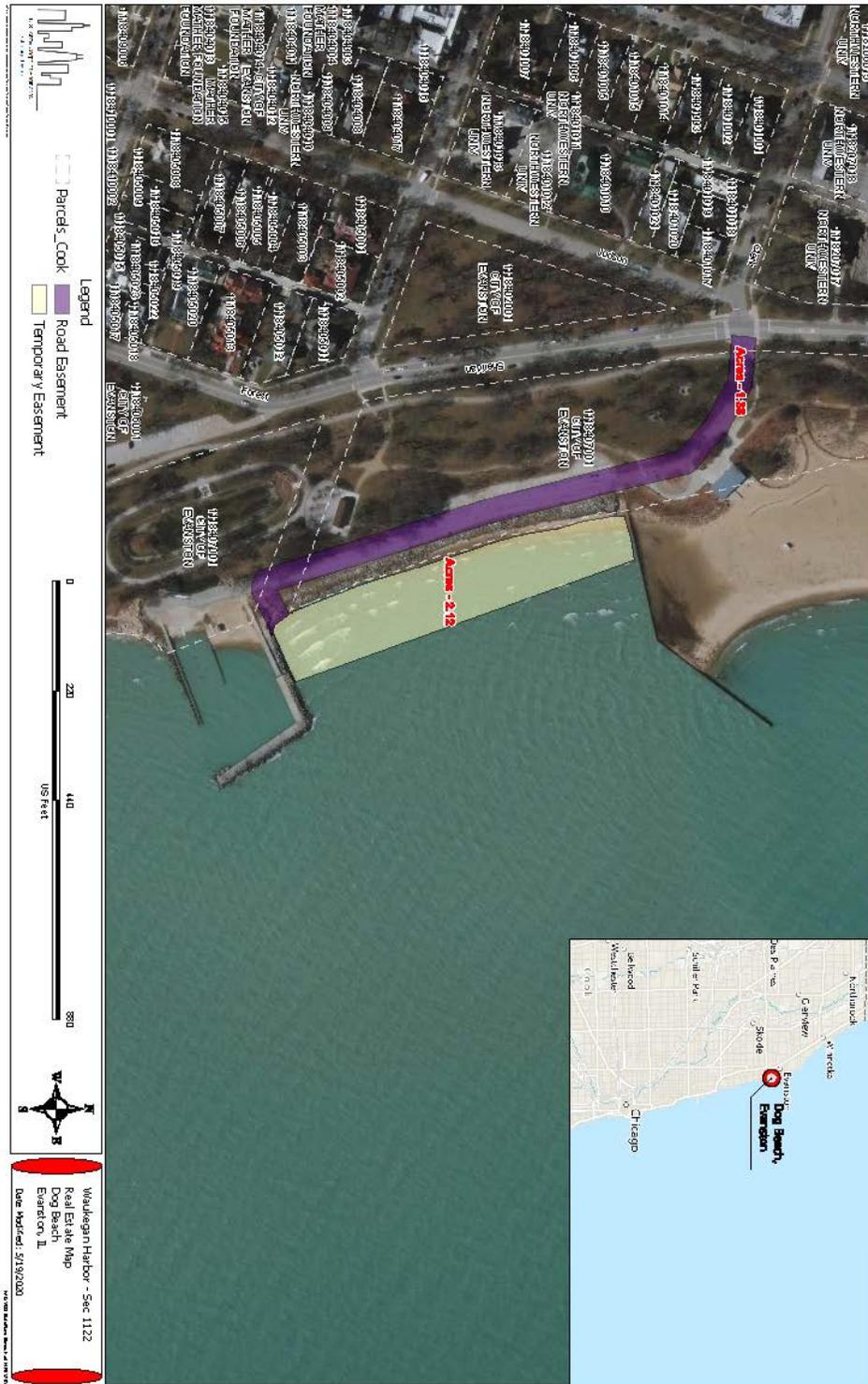


Figure 5: Greenwood Street Beach in Evanston

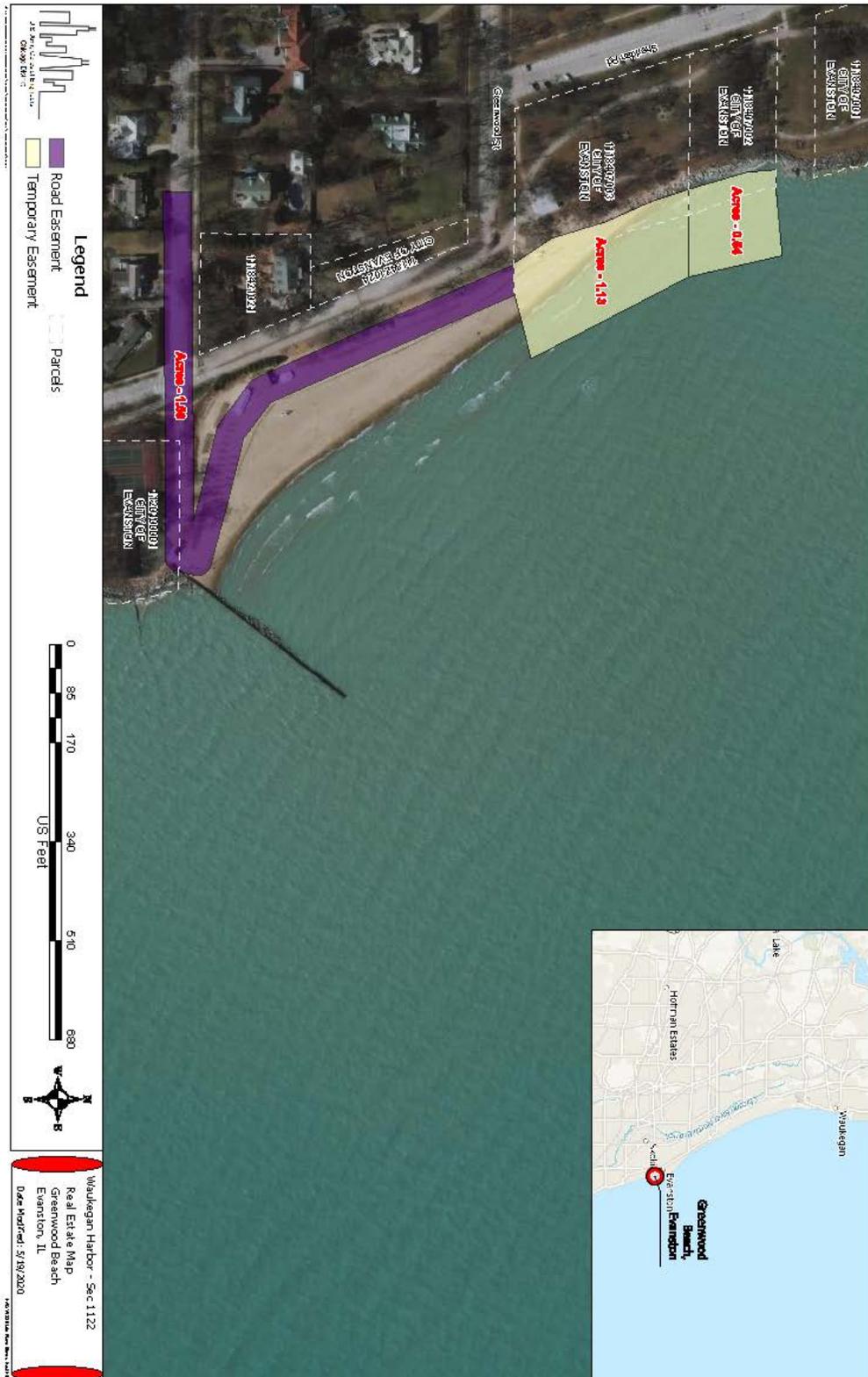


Figure 6: Lee Street Beach in Evanston



7 PROJECT DESCRIPTION

The purpose of this project is to beneficially use dredge material from Waukegan Harbor for the purpose of ecosystem restoration in four Illinois coastal communities. It will likely create flood risk management and/or coastal storm damage reduction benefits as well. The project includes dredging and sand transport, onshore sand placement, and beach monitoring. It will serve as an important proof-of-concept for how multiple communities – in close partnership with USACE – can amplify the collective impact of shoreline protection measures; paving the way for lasting and more holistic public shoreline protection in the region.

8 GENERAL METHODS

The following sections contain information that was requested and gathered in accordance with ER 1165-2-132 for this assessment. The information was obtained from:

- Existing information review
- Historical aerial photograph review
- Database research
- Site reconnaissance

This information was used to identify any environmental conditions in the proposed project area that would prevent USACE from implementing ecosystem restoration measures and provide environmental information to guide the team in the development of measures and the associated implementation costs.

9 EXISTING INFORMATION REVIEW

9.1 Sediment Type/Quality

The study area includes 6 beaches where the primary sediment type is sand. There have not been any sediment quality studies done on the site area. However, the areas adjacent to the beaches were found on the NRCS Web Soil Survey map. The area directly adjacent to Greenwood Street Beach, Lee Street Beach, and Dog Beach in Evanston is classified as Plainfield loamy sand. Plainfield loamy sand is considered excessively drained with a high to very high capacity to transmit water. Just past the Plainfield loamy sand area is classified as Urban Land-Psamments Complex, nearly level. Urban Land-Psamments Complex is considered excessively drained with a moderately high capacity to transmit water. The area adjacent to Glencoe Beach in Glencoe, Sunrise Park and Beach in Lake Bluff, and Foss Park in North Chicago is classified as Ozaukee silt loam, 20 to 30% slopes, which is considered moderately well drained with a moderately low to moderately high capacity to transmit water.

Additionally, in 2015, a study was done on the sediment quality at Waukegan Harbor, which is the site where the sand for this project is being dredged. According to the study conducted by the U.S.A.C.E. Chicago District, the sediment dredged from Waukegan Harbor is acceptable for

open water disposal. There have been no detectable levels of PCB's or asbestos since 1997. The sediment was also determined to be approximately 90% fine grain sand.

9.2 Wetlands

The study area includes a portion of Lake Michigan shoreline, which is a Lake type wetland according to the U.S. Fish and Wildlife Service (USFWS). Additionally, the northern half of Foss Beach is classified as a Freshwater Emergent Wetland with the code PEM1J. The code describes the wetland as follows:

System Palustrine (P): The Palustrine System includes all nontidal wetlands dominated by trees, shrubs, persistent emergents, emergent mosses or lichens, and all such wetlands that occur in tidal areas where salinity due to ocean-derived salts is below 0.5 ppt. It also includes wetlands lacking such vegetation, but with all of the following four characteristics: (1) area less than 8 ha (20 acres); (2) active wave-formed or bedrock shoreline features lacking; (3) water depth in the deepest part of basin less than 2.5 m (8.2 ft) at low water; and (4) salinity due to ocean-derived salts less than 0.5 ppt.

Class Emergent (EM): Characterized by erect, rooted, herbaceous hydrophytes, excluding mosses and lichens. This vegetation is present for most of the growing season in most years. These wetlands are usually dominated by perennial plants.

Subclass Persistent (1): Dominated by species that normally remain standing at least until the beginning of the next growing season. This subclass is found only in the Estuarine and Palustrine systems.

Water Regime Intermittently Flooded (J): The substrate is usually exposed, but surface water is present for variable periods without detectable seasonal periodicity. Weeks, months, or even years may intervene between periods of inundation. The dominant plant communities under this Water Regime may change as soil moisture conditions change. Some areas exhibiting this Water Regime do not fall within our definition of wetland because they do not have hydric soils or support hydrophytes. This Water Regime is generally limited to the arid West.

Figure 7: USFWS Wetland Map for Foss Beach



9.3 Surface Water Quality

The State of Illinois is responsible for specifying appropriate water uses for state waters; identification of appropriate water uses takes into consideration the usage and value of public water supply, protection of fish, wildlife, recreational waters, agricultural, industrial, and navigational water ways. The assessment of suitability of a river, lake, stream, or wetland for a particular use is based on physical, chemical, and biological characteristics of the water body. Illinois Environmental Protection Agency (IEPA) applies water quality criteria to protect designated uses of waters of the state, and documents the quality of water of the state in the *National Water Quality Inventory Report*, an integrated report submitted biennially to EPA that is required to comply with Sections 305(b) and 303(d) of the Clean Water Act (CWA).

IEPA has conducted surface water quality assessments for the waters of Lake Michigan, including the shoreline waters that are part of each site. As of 2018, IEPA assessed 64 miles of Lake Michigan shoreline. It was determined that some of the Lake Michigan shoreline is intermittently not supporting of primary contact and fish consumption, due to *E. coli*, PCB's, and mercury. The Illinois Department of Health hosts a website called the Illinois BeachGuard System that has historical data on beach closings across the state. For Sunrise Beach and Park, there have been 37 closures since 2006, all related to high bacteria levels. Glencoe Beach has been closed 71 times due to high bacteria levels, 5 times due to rainfall, and once due to sewage. Greenwood Street Beach has had 68 closures, Lee Street Beach 71, and Dog Beach 65, all due to high bacteria levels. The reasons most often cited were "Unknown" or "Storm water runoff" for all beaches. There was no monitoring information for Foss Park.

9.4 Groundwater

No project specific studies have been done to characterize the groundwater water quality at the project site. Surface topography may be indicative of the direction of surficial groundwater flow. The available topographic maps indicate the general topographic gradient of the site is to the east towards Lake Michigan.

10 HISTORICAL AERIAL PHOTOGRAPH REVIEW

Indications of potential RECs can be determined by identifying the past land use and site activities at the project area and surrounding areas. Identifying industrial and residential areas and locating extensive areas that lack vegetation can determine indications of a potential REC. Historical aerial photographs for the project area are included in **Attachments 2 and 3**.

A series of historical aerials dated 1938 to 2020 were reviewed; findings are presented in **Tables 1-4**.

Table 1: Summary of Historical Aerial Photograph Review for Sunrise Park and Beach

Photo Year	Observation
1946 Aerial Photograph	The project area is a beach surrounded by a forested area with dense foliage.
1961 Aerial Photograph	Residential development has occurred adjacent to the beach.
1974 Aerial Photograph	Parts of the beach are beginning to erode.
1993 Aerial Photograph	A large portion of the bottom right area of the site appears to have eroded into a crescent moon shape.
2019 Aerial Photograph	Slight reduction in vegetation adjacent to project site. No other changes apparent.

Table 2: Summary of Historical Aerial Photograph Review for Foss Beach

Photo Year	Observation
1946 Aerial Photograph	The project area is a beach with some sparse vegetation nearby. The area adjacent to the site appears to already be in development. There is a building on the southernmost point of the site that is the City of North Chicago water utility.
1961 Aerial Photograph	The beach remains mostly unchanged.
1974 Aerial Photograph	The project area is unchanged.
1993 Aerial Photograph	The project area did not change much. There are more buildings at the southernmost point of the site that seem to be additions to the water utility.
2020 Aerial Photograph	The project area is unchanged.

Table 3: Summary of Historical Aerial Photograph Review for Glencoe Beach

Photo Year	Observation
1938 Aerial Photograph	The project area is a beach. The land adjacent to the project area appears to be a single-family residential area.
1994 Aerial Photograph	The project area is unchanged.
2020 Aerial Photograph	The project area is unchanged.

Table 4: Summary of Historical Aerial Photograph Review for Lee Street, Greenwood Street, and Dog Beaches

Photo Year	Observation
1938 Aerial Photograph	The project area is a beach. The land adjacent to the project area appears to be a single-family residential area.
1994 Aerial Photograph	The project area is unchanged.
2020 Aerial Photograph	The project area is unchanged.

Review of historical aerial photographs suggests that residential development took place adjacent to the project areas many decades ago. All beach sites have remained beaches since at least 1938.

11 DATABASE SEARCH

A search of available environmental records was conducted utilizing various environmental databases, including those from sites such as the IEPA website. Federal and state databases were searched using the minimum search distances issued in the ASTM E 1527-13 guidelines. **Table 5** notes the recommended ASTM search distances for federal and state databases. All results reported were analyzed during preparation of this report.

Table 5: Minimum Search Distance for Federal and State Databases

Database	Minimum Search Distance (mi)
Federal NPL Site List	1.0
Federal CERCLIS List	0.5
Federal NPL Site List	1.0
Federal CERCLIS List	0.5
Federal CERCLIS NFRAP (SEMS-ARCHIVE) site list	Property and Adjoining Properties
Federal RCRA CORRACTS Facilities List	1.0
Federal RCRA non-CORRACTS TSD Facilities List	0.5

Database	Minimum Search Distance (mi)
Federal RCRA Generators List	Property and Adjoining Properties
State Equivalent NPL	1.0
State Equivalent CERCLIS	0.5
State Landfill/Solid Waste Disposal Site Lists	0.5
State LUST Lists	0.5
State registered UST List	Property and Adjoining Properties

11.1 SEMS

SEMS (Superfund Enterprise Management System) tracks hazardous waste sites, potentially hazardous waste sites, and remedial activities performed in support of EPA's Superfund Program across the United States. The list was formerly known as CERCLIS, renamed to SEMS by the EPA in 2015. The list contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). This dataset also contains sites which are either proposed to or on the National Priorities List (NPL) and the sites which are in the screening and assessment phase for possible inclusion on the NPL. SEMS-ARCHIVE tracks sites that have no further interest under the Federal Superfund Program based on available information. The list was formerly known as the CERCLIS-NFRAP, renamed to SEMS ARCHIVE by the EPA in 2015. EPA may perform a minimal level of assessment work at a site while it is archived if site conditions change and/or new information becomes available. Archived sites have been removed and archived from the inventory of SEMS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list the site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. The decision does not necessarily mean that there is no hazard associated with a given site; it only means that based upon available information, the location is not judged to be potential NPL site. There were no SEMS search results within the minimum search distance for Sunrise Park and Beach, Glencoe Beach, Lee Street Beach, Greenwood Street Beach, or Dog Beach. There were two sites discovered near Foss Beach, which are shown in **Table 6**.

Table 6: SEMS Database Search Results for Foss Beach

Database	Site Name	Status	Potential Impact
SEMS	Chemical Packaging Site	Not on NPL. No site assessment work needed.	No known releases. REC unlikely.
SEMS	Lavin & Sons	Not on NPL. Site reassessment start needed.	No known releases. REC unlikely.

11.2 RCRIS

The Resource Conservation and Recovery Information System (RCRIS) lists sites which generate, transport, store, and/or dispose of hazardous waste defined by the Resource Conservation and Recovery Act (RCRA). The RCRIS database includes RCRA Corrective Action Report (CORRACTS), which identify hazardous waste handlers with RCRA corrective action activity; RCRA treatment, storage, and disposal facilities (TSDFs), and RCRA conditionally exempt small quantity generators (CESQGs), RCRA small quantity generators (SQGs), and large quantity generators (LQGs) facilities. The database search returned one RCRA corrective action site and one non-corrective site within the recommended search distance for Foss Beach, and one small quantity generator (SQG) and one conditionally exempt small quantity generator (CESQG) near Glencoe Beach, see **Tables 7 and 8**. No sites were found for Sunrise Park and Beach, Lee Street Beach, Greenwood Street Beach, or Dog Beach.

Table 7: RCRIS Database Search Results for Foss Beach

Database	Site Name	Status	Potential Impact
RCRA-SQG CORRACTS	Abbie Inc.	Facility handled ignitable waste with RCRA CORRACTS required.	Releases addressed. Site closed. REC unlikely.
RCRA	City of North Chicago Landfill	Facility handled ignitable waste. No violations.	No known releases. REC unlikely.

Table 8: RCRIS Database Search Results for Glencoe Beach

Database	Site Name	Status	Potential Impact
RCRA-SQG	Top Cleaners	Facility handles various spent halogenated solvents.	No known releases. REC unlikely.
RCRA-SQG	Village of Glencoe Public Works	Facility has handled ignitable waste. No violations.	No known releases. REC unlikely.

11.3 ERNS/SPILLS

The SPILLS database contains a listing of hazardous materials incidents reported to the Illinois Emergency Management Agency and the Office of Emergency Response. Spills were found near Sunrise Park and Beach, Foss Beach, and Glencoe Beach as shown in **Tables 9, 10, and 11**.

Table 9: SPILLS Database Search Results for Sunrise Park and Beach

Database	Site Name	Status	Potential Impact
SPILLS LUST	45261 E. Scranton Ave.	Heating oil spill occurred in 2004, spill reported from LUST incident.	See Table 12

Table 10: SPILLS Database Search Results for Foss Beach

Database	Site Name	Status	Potential Impact
SPILLS LUST	1900 Foss Park Ave.	Fuel oil spill occurred in 1989, spill reported from LUST incident.	See Table 13
SPILLS	501 Foss Park Ave.	Poison gas leak occurred in 1989, leak reported from 50-gallon drum.	Reported releases addressed. REC unlikely.
SPILLS LUST	501 Foss Park Ave.	Waste oil spill occurred in 1990. Leak reported from LUST incident.	See Table 13
SPILLS LUST	Sheridan Rd. & Foss Park Ave.	Fuel oil spill occurred in 1992. Spill reported from LUST incident.	See Table 13
SPILLS	501 Foss Park Ave.	1,3-dihydroxymethyl-5 spill occurred in 1995 from 50-gallon drum.	Reported release addressed. REC unlikely.
SPILLS LUST	1820 Sheridan Rd.	Gasoline spill occurred in 2006. Spill reported from LUST incident.	See Table 13
SPILLS	1704 Sheridan Rd.	Hydraulic oil spill from dump truck occurred in 2006.	Reported release addressed. REC unlikely.

Table 11: SPILLS Database Search Results for Glencoe Beach

Database	Site Name	Status	Potential Impact
SPILLS LUST	196 Beach Rd.	Heating oil spill occurred in 2000, spill reported from LUST incident.	See Table 14
SPILLS LUST	325 Hazel Ave.	Diesel spill occurred in 1991, spill reported from LUST incident.	See Table 14

Database	Site Name	Status	Potential Impact
SPILLS LUST	320 Hazel Ave.	Gasoline spill occurred in 1998. Leak reported from LUST incident.	See Table 14

11.4 SSU

A State equivalent CERCLIS database: the State Response Action Program database identifies the status of all sites under the responsibility of the Illinois EPA's State Sites Unit. These sites may or may not have already been listed on the federal CERCLIS list. There are no SSU sites within the recommended search distance.

11.5 SWF/LF

The IEPA records the state's Solid Waste Facilities/Landfill sites (SWF/LF). These sites may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites. There are no SWF/LF sites within the recommended search distance.

11.6 CCDD

Construction and demolition (C and D) debris is nonhazardous, uncontaminated material resulting from construction, remodeling, repair, or demolition of utilities, structures, and roads. There are no CCDD sites within the recommended search distance.

11.7 Special Waste LF

These landfills, as of January 1, 1990, accept non-hazardous special waste pursuant to the Illinois EPA Non-Hazardous Special Waste Definition. List A includes landfills that may receive any non-hazardous waste, Non-Regional Pollution Control Facilities are so noted. List B includes landfills designed to receive specific non-hazardous wastes. List B landfills are designated as a Regional Pollution Control Facility by RPCF, or Non-Regional Pollution Control Facility by Non-RPCF. There are no special waste landfill sites within the recommended search distance.

11.8 IL NIPC

NIPC is an inventory of active and inactive solid waste disposal sites, based on state, local government and historical archive data. Included are numerous sites which previously had never been identified largely because there was no obligation to register such sites prior to 1971. There are no IL NIPC sites within the recommended search distance.

11.9 LUST/UST

The Illinois State Fire Marshall maintains a listing of registered underground storage tanks (UST), as required by RCRA Subtitle I. The Illinois Environmental Protection Agency maintains a listing of leaking underground storage tank reports (LUST). There are multiple LUSTs and USTs reported in the database search results, see **Table 10** below.

Table 12: IL LUST/UST Database Search Results for Sunrise Park and Beach

Database	Site Name	Status	Potential Impact
LUST	Center Avenue Partners	IEPA 0970755107, incident 20041815	Reported releases addressed. REC unlikely.

Table 13: IL LUST/UST Database Search Results for Foss Beach

Database	Site Name	Status	Potential Impact
LUST	Stone Container	IEPA 0971255006, incident 891337	Reported releases addressed. REC unlikely.
LUST	Brown Printing	IEPA 0971255036, incident 901346	Reported releases addressed. REC unlikely.
LUST	Foss Park District	IEPA 0971255057, incident 920151	Reported releases addressed. REC unlikely.
LUST	City of North Chicago	IEPA 0971255130, incident 20060146	Reported releases addressed. REC unlikely.

Table 14: IL LUST/UST Database Search Results for Glencoe Beach

Database	Site Name	Status	Potential Impact
LUST	Village of Glencoe (325 Hazel Ave.)	IEPA 0310995009, incident 912525	Reported releases addressed. REC unlikely.
LUST	Village of Glencoe (320 Hazel Ave.)	IEPA 0310995009, incident 982189	Reported releases addressed. REC unlikely.
LUST	196 Beach Develop Co. LLC	IEPA 0310995027, incident 20000558	Reported releases addressed. REC unlikely.

11.10 SRP and INST/ENG CONTROL

The Site Remediation Program (SRP) database lists all voluntary remediation projects administered through the pre-notice site clean-up program (1989 to 1995) and the site remediation program (1996 to present). Some of the SRP sites have engineering and/or institutional controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated

substances to enter environmental media or effect human health. Institutional controls include administrative measures, such as groundwater use restriction, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls. There are no SRP sites near any of the locations investigated.

12 Site Reconnaissance

A site visit was conducted on July 7, 2020. The purpose of the site reconnaissance was to make observations of surficial conditions of the project site for evidence of HTRW or other environmental issues. See **Attachment 2** for site visit photographs. The weather on the day of the site visit was sunny and warm. The weather in the few days prior to the site visit was also sunny and warm.

The first sites visited were Lee Street Beach, Greenwood Street Beach, and Dog Beach in Evanston. Lee Street Beach and Greenwood Street Beach were accessed via Dempster Street, as the main entrances were blocked off. Near the main entrance of Greenwood Street Beach there is a building used for public restrooms, with some garbage and recycling bins nearby. The surrounding park appeared well maintained with no debris or dumping. Both Greenwood and Lee Street Beaches were being used for recreation. The water level was very high. Both beaches had areas that were completely under water up to the rock walls. Dog Beach was closed entirely due to the high water level; pictures were taken from Greenwood Street Beach or behind the fence blocking the beach. None of the beaches had any evidence of hazardous waste, petroleum, or chemical waste.

The second site visited was Glencoe Beach in Glencoe. Glencoe beach was accessed via an access road monitored by park staff that leads down a bluff into the beach area. Upon entering the beach there is a boathouse with an adjacent area covered in sailboats. Next to the boathouse there were two large blocks of rebar that did not appear to have any waste on them. Past the boat area is a beach for recreation with picnic tables and a playground. Near the base of the bluff is a pavilion with picnic tables underneath. On the southernmost part of the beach there is a pier, but it was closed off due to not being structurally stable. There was not any evidence of any HTRW or non-HTRW environmental issues.

The third site visited was Sunrise Park and Beach in Lake Bluff. This beach was also accessed via an access road monitored by park staff that leads down a bluff into the beach area. The beach is used for recreational purposes as well. The erosion is very apparent on this beach, as several crescent moon shapes have formed along the beach where sand has eroded away. There is also an area that is temporarily closed off because it is entirely under water up to the riprap. Near the southernmost point is a fenced off area for dogs. Just south of the dog area is a building that a park employee stated is a water treatment facility. No evidence of any HTRW or non-HTRW environmental issues was found.

The final site visited was Foss Park in North Chicago. The park was accessed via an access road near some buildings that appear to be industrial in nature, though not noticeable in aerial photographs. The beach area was closed for the day though there was not any clear information

why. There was no clear access to the beach, except a make-shift path through the riprap and under a boardwalk that was closed due to structural issues. The beach was covered with debris, including trash and dead trees. The beach was empty but is normally used for recreational purposes. It was impossible to access the northern third of the beach due to a large tree blocking the way. It was noted that much of the upper parts of the beach have what appears to be black sand. The sand is odorless, fine, and contains mica. The area where the black sand was located appeared to have a healthy amount of vegetation, so it is unlikely the black sand is doing any environmental damage.

There are no indications that any of the project sites contain HTRW. During work, the Contractor may encounter some debris at Foss Park such as dead trees, bricks, or stone. Those materials could be removed from the beach by the Local Sponsor prior to construction to ensure problem free construction.

13 FINDINGS AND CONCLUSIONS

This HTRW investigation was performed to determine if HTRW and non-HTRW environmental issues at the Northern Illinois Coastal Communities Section 1122 study area, or surrounding area, have impacted the project site or will impact implementation of a project. According to ER 1165-2-132, non-HTRW environmental issues that do not comply with federal, state, and local regulations should be discussed in the HTRW evaluation along with HTRW issues. No HTRW issues were identified during this investigation. One non-HTRW issue was identified in the investigation. The Contractor may encounter debris at Foss Park consisting of stone, bricks, or dead trees.

No HTRW investigation can wholly eliminate uncertainty regarding the potential for HTRW associated with a project area. Performance of the HTRW investigation is intended to reduce, but not eliminate, uncertainty regarding the potential for HTRW in connection with a project area.

14 REFERENCES

- American Society for Testing of Materials. Publication E 1527-13. Standard Practice for Environmental Assessments: Phase I Environmental Site Assessment Process.
- Department of the Army. U.S. Army Corps of Engineers. ER 1165-2-132. Hazardous, Toxic, and Radioactive Waste (HTRW) Guidance for Civil Works Projects. June 1992.
- IEPA Bureau of Water, 2014. Illinois Integrated Water Quality Report and Section 303(d) List, Water Resource Assessment Information and Listing of Impaired Waters.
- USGS 2003. Kay and others - Concentrations of Polynuclear Aromatic Hydrocarbons and Inorganic Constituents in Ambient Surface Soils, Chicago, Illinois: 2001-02—U.S. Geological Survey Water-Resources Investigations Report 03-4105.
- 35 Illinois Administrative Code. Environmental Regulations for the State of Illinois.

**HAZARDOUS, TOXIC, AND RADIOACTIVE WASTE (HTRW)
PHASE I ENVIRONMENTAL SITE ASSESSMENT
NORTHERN ILLINOIS COASTAL COMMUNITIES SECTION 1122 PROJECT
COOK AND LAKE COUNTY, ILLINOIS**

Digital copies of attachments available upon request

Attachment 1: Historical Aerial Photographs

Sunrise Beach 1946



Sunrise Beach 1961



Sunrise Beach 1974



Sunrise Beach 1993



Foss Beach 1946



Foss Beach 1961



Foss Beach 1974



Foss Beach 1993



Glencoe Beach 1938



Glencoe Beach 1994



Evanston Beaches 1938



Lee Street Beach 1999



Greenwood Street Beach 1999



Dog Beach 1999



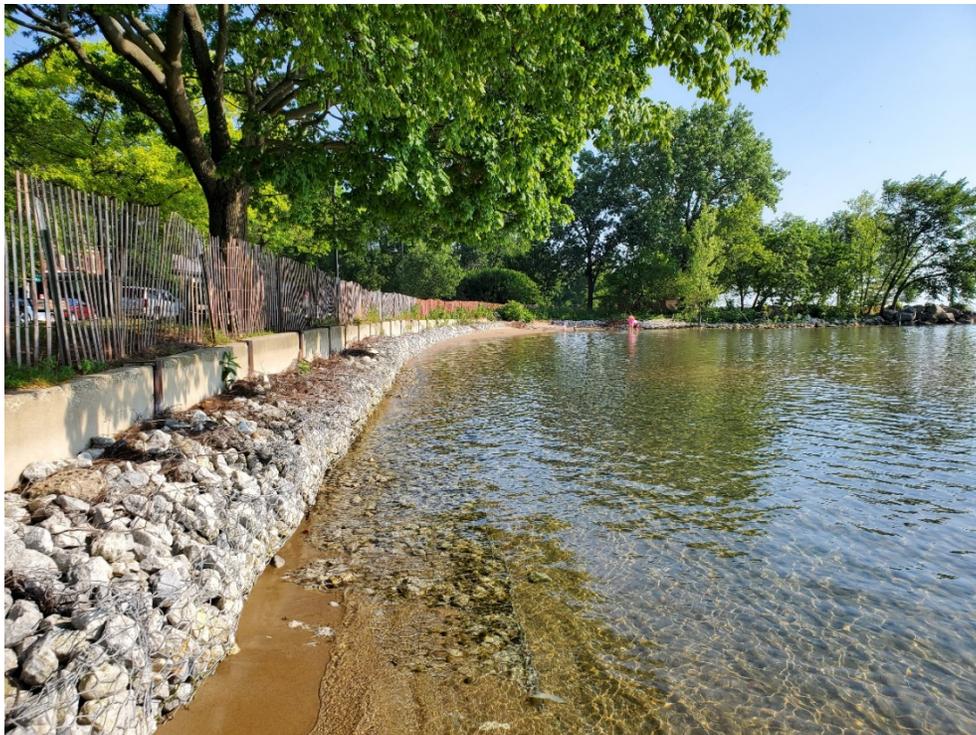
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Attachment 2: Site Visit Photographs

Lee Street Beach



Lee Street Beach facing north.



Northernmost part of Lee Street Beach, now under water.

Greenwood Street Beach



Greenwood Street Beach facing north.



Northern portion of Greenwood Street Beach; water line reaching riprap.

Dog Beach



Dog Beach facing north.

Glencoe Beach



Glencoe Beach boathouse.



Glencoe Beach facing south.



Glencoe Beach pier.

Sunrise Park and Beach



Sunrise Park and Beach facing south.



Northern portion of Sunrise Beach now temporarily closed.



Water treatment facility on beach property.



Sunrise Park and Beach facing south.

Foss Park



Water treatment facility at Foss Park.



Entrance to Foss Beach.



Dead tree and debris on beach.



Black sand with some vegetation.