



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 27 2017

REPLY TO THE ATTENTION OF:

S-6J

Tia Cauley, Executive Director
East Chicago Housing Authority
4920 Larkspur Street
East Chicago, Indiana 46312

Re: Demolition Activities in Zone 1 of the U.S. Smelter and Lead Refinery, Inc.
Superfund Site

Dear Executive Director Cauley:

Recently, contractors for the East Chicago Housing Authority (ECHA) submitted for review to the U.S. Environmental Protection Agency a remedial action plan (RAP) for proposed demolition work at the U.S. Smelter and Lead Refinery Inc., Superfund Site (Site) in East Chicago, Indiana. Specifically, the RAP will be included with the application submitted to the U.S. Department of Housing and Urban Development (HUD) for demolition of the West Calumet Housing Complex (WCHC) located in Zone 1 of the Site. This letter describes the scope of EPA's review the RAP.

As you are aware, soils in WCHC contain elevated levels of lead and arsenic as a result of historic industrial operations in the area. In 2012, EPA issued a Record of Decision (ROD) setting forth its plans for remediation of residential portions of the Site, including WCHC. Consistent with the ROD, EPA planned to excavate, dispose of, and replace contaminated soils at WCHC. However, in 2016 ECHA informed EPA that it intended to demolish the WCHC. Because demolition of WCHC would expose contaminated soils covered by WCHC's concrete foundations and re-contaminate any soils remediated by EPA, EPA put on hold its excavation plans.

Among other things, the RAP and its Appendices outline measures that will be taken by ECHA and its contractors to ensure that the demolition activities do not cause releases of contaminated materials beyond the boundaries of WCHC. The RAP also outlines measures to be taken after the demolition is completed to ensure that contaminated soils left behind do not pose an immediate threat to public health and the environment. EPA reviewed these measures to ensure that the demolition work would be protective of human health and the environment.

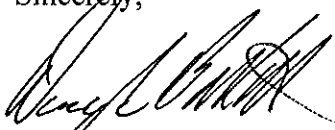
Specifically, EPA reviewed the Air Monitoring and Sampling Plan, the Asbestos Survey Project Report, the Waste Management Plan, and the Health and Safety Plan. EPA provided comments requesting modification of the plans to include measures to prevent the movement of contaminated materials beyond the project boundaries and to stabilize the site after demolition is completed. All of EPA's comments have been incorporated into the RAP, and EPA is willing to

work with ECHA to ensure that it effectively implements the requirements under the RAP. If the RAP is effectively implemented, EPA believes that it is unlikely the demolition work will exacerbate the scope of contamination at the Site or cause releases beyond the project boundaries.

EPA did not review the scope or requirements of the demolition work itself because EPA does not consider the demolition work to be a response action for preventing or minimizing a release of hazardous substances consistent with the selected ROD or National Contingency Plan. The sole purpose of EPA's review was to ensure that contamination already present at WCHC does not leave the boundaries of that property during and after the demolition. Please be advised that EPA's review of the RAP and issuance of this letter are not intended to be and do not constitute a release from any CERCLA liability ECHA might have.

If you any questions regarding EPA's review or this letter, please feel free to contact Tom Alcamo, Remedial Project Manager at (312) 886-7278 or Steven Kaiser, Associate Regional Counsel at (312) 353-3804.

Sincerely,



for Margaret M. Guerriero
Acting Director
Superfund Division