



**U.S. Department of Housing and Urban  
Development**

451 Seventh Street, SW  
Washington, DC 20410  
www.hud.gov

espanol.hud.gov

# **Supplemental Information**

## **Environmental Assessment**

### **Determinations and Compliance Findings for HUD-assisted Projects**

#### **24 CFR Part 58**

**This is a suggested format that may be used by Responsible Entities to document completion of an Environmental Assessment.**

#### **Project Information**

**Project Name:** Kerr-McGee Superfund Remediation/Community Park Project

**Responsible Entity:** City of West Chicago

**Grant Recipient** (if different than Responsible Entity):

**State/Local Identifier:** Illinois, DuPage County

**Preparer:** Lisa Mash

**Certifying Officer Name and Title:** Michael Guttman, City Administrator

**Grant Recipient** (if different than Responsible Entity):

**Consultant** (if applicable): Civil & Environmental Consultants, Inc.

**Direct Comments to:**

Mr. Michael Guttman at [mguttman@westchicago.org](mailto:mguttman@westchicago.org)

**Project Location:** The Kerr-McGee site is located at the southwest corner of Blair Street and Ann Street in West Chicago, DuPage County, Illinois (City) (see Figure 1). The site will be the location of a new community park that will be constructed on the following 14 parcels totaling approximately 43 acres (see Figure 2), herein referred to as the “project area”:

<b>PIN</b>	<b>Property Owner</b>
409423007	Weston Solutions Inc.
409423002	Weston Solutions Inc.
416202001	Weston Solutions Inc.
409425012	City of West Chicago
409425001	City of West Chicago
409432038	City of West Chicago
409432036	City of West Chicago
409432025	Weston Solutions Inc.
409423012	Weston Solutions Inc.
409432037	Weston Solutions Inc.
409433003	Weston Solutions Inc.
409423006	Weston Solutions Inc.
409423013	Weston Solutions Inc.
409423011	Weston Solutions Inc.
PIN: Property Identification Number	

The project area is bordered on the west by the Wisconsin Central Ltd. (WCL) Railroad (formerly Elgin-Joliet and Eastern [EJ&E], and currently owned by Canadian National), on the east and north by residential areas, and on the south by light commercial development. According to the U.S. Department of Housing and Urban Development (HUD), which obtains data from the U.S. Census, the area of the proposed community park is located within a Low to Moderate Income Area (LMA) with 82.81% of households earning less than 80% of the Area Median Income (HUD 2024) which meets HUD’s qualification criteria for the Community Development Block Grant (CDBG) program of 51% low- and moderate income persons (see Figures 3-5).

**Description of the Proposed Project** [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The proposed project consists of the construction of a new envisioned park at the Kerr-McGee site, a former industrial park contaminated with radioactive thorium wastes. The new envisioned community park was contemplated as part of a federal Consent Decree associated with the Kerr-McGee contamination remediation. The proposed project area comprises 14 parcels of land where environmental remediation activities have occurred since 1997. Those investigations and remediation activities (further described below under *Existing Conditions and Trends*) have resulted in the cleanup of contaminated soil and groundwater at the site. The final corrective measures are being implemented to complete the groundwater remediation activities. Once complete, those parcels will then be transferred over to the City for the newly envisioned park.

The City approved the new Community Park Master Plan developed by Upland Design Ltd on September 5, 2023, after extensive work with City staff and community members. The proposed development's general scope includes site preparation and the recreational park's construction. Proposed amenities include a therapeutic playground, walking paths, a monarch butterfly garden, a community gathering space for festivals, multi-use fields, and a challenge course. All the new parking lots will include Americans with Disabilities Act (ADA) parking spaces and pedestrian drop off locations. Additionally, a path will be constructed under the Canadian National Railroad tracks that would link the new park to the existing Pioneer Park and allow residents on both sides of the tracks to enjoy the amenities of both Parks (see Figure 6).

Groupings of Illinois native trees will be planted throughout the park along with pockets of native prairie. The proposed park will be constructed over 4 phases, starting in 2026 and completed by 2029. During the initial phase of the project, the City plans to use the Community Project Funding (CPF) grant funds to assist with natural area establishment including lawn restoration, planting of trees, and planting of perennials and ornamental grasses.

As part of the proposed project, the following best management practices (BMPs) and measures will be implemented by the Contractor hired by the City to avoid and/or minimize potential impacts to human and natural resources during construction of the new park. The Contractor will:

- 1) Properly inspect and maintain all equipment.
- 2) Use water or chemical dust suppressant in exposed areas to control dust during construction.
- 3) Ensure trucks hauling dust-generating materials will be covered during construction.
- 4) Ensure reduced vehicle speeds on non-paved areas and all paved areas to be kept clean.
- 5) Follow specified procedures for managing contaminated materials discovered or generated during construction.
- 6) Employ spill mitigation measures immediately upon a spill of fuel or leaks from equipment during construction.
- 7) Outfit all internal combustion construction equipment with effective mufflers.
- 8) Limit construction to hours allowed by local ordinance or Monday through Saturday from 7 a.m. to 6 p.m., whichever is more restrictive.
- 9) Implement and maintain erosion and sedimentation control measures to prevent sediment laden stormwater runoff to be conveyed off-site during construction.
- 10) Properly dispose of construction waste and debris in accordance with all applicable federal, state, and local laws and regulations.
- 11) If project construction uncovers significant archaeological deposits, the Contractor agrees to immediately stop all work in that area and inform the City. Work will not commence again in that area until the City has conferred with the SHPO and/or Native American Tribes and informed the Contractor that work can re-commence.
- 12) Comply with all federal and state laws and regulations regarding the protection of sensitive wildlife and habitat, including migratory birds.

**Statement of Purpose and Need for the Proposal** [40 CFR 1508.9(b)]:

The Kerr-McGee site is one of four Superfund National Priorities List (NPL) sites in the West Chicago area contaminated with radioactive thorium wastes. The radioactive waste came from a nearby facility known as the Rare Earths Facility (REF). The REF produced non-radioactive elements known as rare earths and radioactive elements such as thorium, radium and uranium along with gas lantern mantles for private entities and federal atomic energy programs. As stated above, environmental remediation activities have occurred at the site since 1997. The overall cleanup of the site has now plagued West Chicago for over three decades.

The purpose of the project is to transform the decontaminated area into a state-of-the-art park that engages all members of the West Chicago community by establishing active and passive amenities, introducing a diverse plant palette within the park and creating neighborhood connections to the site. The proposed project will benefit the surrounding neighborhoods and local area. The goal of the project is to provide a recreational area for children and adults to promote physical wellness and social health. The new park will convert a former Superfund site into a recreational space.

**Existing Conditions and Trends** [24 CFR 58.40(a)]:

The history of the site is provided below as well as a summary of the environmental site assessments, investigations, and remediation activities that have occurred at the Kerr-McGee site (proposed project area) since 1994 and the final decommissioning activities that are in progress.

The former REF at the Kerr-McGee site was originally operated by Lindsay Chemical Company, subsequently by American Potash and Chemical Company, and finally by Kerr-McGee Chemical Corporation, which created Tronox, LLC (Tronox) as a subsidiary company. Tronox filed for bankruptcy in January 2009 and Weston Solutions, Inc. (Weston), as trustee for the West Chicago Environmental Response Trust (WCERT), is the current Radioactive Material Licensee. The facility operated from 1932 through 1973, producing and refining chemicals and metals, including thorium and rare earth compounds from ores. Kerr-McGee operated the facility for a short period between 1967 and 1973 under license from the U.S. Nuclear Regulatory Commission (NRC), previously the Atomic Energy Commission. Many of the early operations were conducted prior to the regulatory scheme established by the Atomic Energy Act in 1954.

From 1932 to 1973, thorium was produced at the facility for commercial purposes and for the federal government. Commercially, thorium was primarily used in gas lantern mantles, such as those formerly used for "gaslights" for street and home lighting and now used on a more limited scale in camping lanterns. The federal government purchased thorium for national stockpiles established by the Strategic and Critical Materials Stockpiling Act of 1946. Beginning in 1953, the General Services Administration procured some of the product from the West Chicago facility, and during the late 1950's, the Atomic Energy Commission purchased thorium processed at the site.

In September 1993, Kerr-McGee submitted a license application to decommission the facility. After an extensive review period, in February 1994, the Illinois Emergency Management Agency

(IEMA) informed Kerr-McGee that a phased approach to site decommissioning would be acceptable. IEMA has authorized a total of eight (8) phases and prepared environmental impact assessments for each. The major activities authorized and accomplished under these phases are detailed below. In some cases, work authorized under one phase was not completed until a subsequent phase.

Phase I (May 1994): site preparation, including construction of support zone facilities, a retention pond, a rail siding, and a railcar loading facility.

Phase IA (August 1994): construction of additional support zone structures.

Phase IB (September 1994): shipment of significant amounts of material from surface stockpiles (sediment, tailings, debris piles, and containerized materials) to Envirocare; management and shipment of contaminated off-site materials brought on-site for shipment to Envirocare via the railcar loading facility.

Phase II (April 1995): excavation of waste pond sediments and some below-grade material; construction of infrastructure facilities; preparation of the site for a Water Pre-Treatment Plant and a Physical Separation Facility; backfilling of certain areas subject to IEMA verification.

Phase IIA (September 1995): shipment of 87,000 tons of contaminated on-site material and 54,000 tons of contaminated off-site material to Envirocare for disposal during calendar years 1995 and 1996.

Phase III (February 1997): excavation of contaminated materials; installation of sheet piling; backfilling of excavations and grading; construction of haul roads; construction and operation of the Water Treatment Plant and Simplified Physical Separation Facility; delineation drilling; groundwater monitoring. During 1997, 27,000 tons of contaminated material from the site and 51,000 tons of off-site material were shipped for disposal.

Phase IV (April 1998): deep excavation below the water table; dewatering; backfilling and final grading of the site. The site cleanup, except for groundwater remediation and a small footprint of contaminated soils beneath the railcar load-out facility was completed in November 2004. The railcar facility continued to operate while off-site materials were being received from the U.S. Environmental Protection Agency (EPA) Superfund cleanup of Kress Creek and the residential areas.

Phase V (June 2013): groundwater remediation is the final phase of cleanup under closure requirements outlined in the licensing regulations for this source/mill tailings site. A groundwater corrective action plan (CAP) was submitted by Tronox and accepted by IEMA. Implementation of corrective actions could take 5 to 50 years to achieve the groundwater protection standards established to meet unrestricted release of the site.

In 2013, the WCERT hired contractors to excavate and ship contaminated materials and restore the REF site to the final grading plan established in 1996. This contract was awarded in May 2013 and excavation activities started in July 2013. Work was scheduled to be completed in November 2013 but more subsurface contamination than estimated was discovered pushing the project into 2014.

Decommissioning activities in 2014 showed some progress with characterizing, excavating, and shipping contaminated soils that were previously unaccounted for. However, funding limitations delayed the timely removal of the remaining source until the spring of 2015. By the spring of 2015, Title X Department of Energy reimbursements had been re-established and the decommissioning was able to be completed. With the final railcar of contaminated soil shipped to Energy Solutions in Clive, Utah in November of 2015. All remediated areas were verified to comply with residential-use-based soil cleanup standards. After the soil remediation portion of the decommissioning activities was completed, the primary focus has been on groundwater remediation.

Although all on-site materials meet cleanup standards, residual constituents such as uranium continue to leach from some of the remediated soil into the shallow groundwater aquifer below the site. Under current conditions, the resulting contaminated groundwater in the shallow aquifer below the site does not pose an exposure threat to human health and the environment because it is confined to a small geographical area and its constituent concentrations are declining. Additionally, there are existing laws and regulations in place that prevent and control the use of this groundwater for human consumption and other uses. Furthermore, groundwater in the deep bedrock aquifers, from which the City of West Chicago derives its water supply, is not impacted by the shallow groundwater contamination at the site.

IEMA is overseeing the final phase of groundwater cleanup. WCERT has begun implementing the final corrective measures to complete the groundwater remediation activities at the site. The final radiation cleanup of the groundwater is slated to finish in 2026. After the groundwater remediation portion of the decommissioning activities has been completed, the lands associated with those activities within the project area will be conveyed to the City of West Chicago for park development.

DuPage County has the second largest population (next to Cook County) among all counties in the State of Illinois and offers the benefits of urbanized living, high quality educational systems, a wide variety of housing, extensive areas of open space, recreational resources, and excellent health care facilities in a safe and attractive environment. The City of West Chicago is mostly a suburban area, as is most of DuPage County.

During the site reconnaissance conducted by Civil & Environmental Consultants, Inc. (CEC) on September 30, 2023, the project area was observed to be vacant land composed of mowed grasses with no buildings present. There is a parking lot in the northern portion of the project area and a small drive and pad in the central portion of the project area. Earthwork construction

associated with the ongoing remediation activities was also observed within portions of the project area.



**U.S. Department of Housing and Urban  
Development**

451 Seventh Street, SW  
Washington, DC 20410  
[www.hud.gov](http://www.hud.gov)

[espanol.hud.gov](http://espanol.hud.gov)