

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

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: 1810 W. Grace St. LLC
f/k/a E.R. Moore Co.

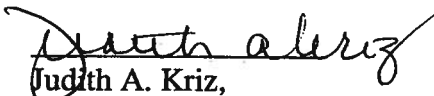
EPA ID No.: ILD 981 777 998

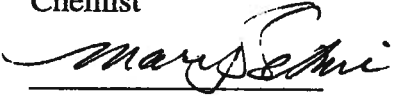
LOCATION ADDRESS: 1810 W. Grace St.
Chicago, IL 60640

NAICS CODE: 339999 (All other miscellaneous manufacturing)

DATE OF INSPECTION: April 30, 2007

USEPA INSPECTOR: Judith Anne Kriz, Chemist

PREPARED BY: 
Judith A. Kriz,
Chemist 2/7/08
Date

REVIEWED BY: 
Mary S. Setnicar, Acting Chief
Compliance Section 1
RCRA Branch 2/7/08
Date

Purpose of Inspection:

On April 30, 2007, I, Judith Kriz, of the Enforcement and Compliance Assurance Branch, U.S. EPA Region 5, conducted an unannounced compliance evaluation inspection (CEI) at the former E. R. Moore Co. site (Moore) located at 1810 W. Grace St., Chicago, IL. The purpose of this CEI was to evaluate Moore's (or the current site owner's) compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically those regulations related to Moore's management of hazardous waste.

History

Chester, the construction superintendent for the construction work at the site (converting site into loft condominiums) advised that he and his crew have been working at the site since around January of 2007. The former owners, E.R. Moore Co. submitted its notification of generation of hazardous waste on September 8, 1986, and received its current EPA ID number. Moore filed its notification as a small quantity generator (SQG) of hazardous waste, specifically F002.

Advance Preparations for Inspection

Enforcement history as well as inspection history were researched prior to this CEI. Records indicate that Moore has never been inspected under RCRA by U.S. EPA or Illinois Environmental Protection Agency (IEPA). Moore filed a notification with IEPA on March 1, 2006, indicating that it was no longer a generator of hazardous waste. The initial notification indicated that the facility was an industrial dry cleaner, hence the generation of perchloroethylene.

Entrance Interview

I began my inspection of Moore at approximately 9:30 am on April 30, 2007, and presented my credentials to Chester, who agreed to the inspection. I also gave him a copy of the U.S. EPA Small Business Resources brochure (SBREFA) as well as the Sustainable Solutions brochure.

Visual Inspection

Chester explained that the two structures at the site were in the process of being gutted, and converted to loft condominiums. At the time of the inspection, Chester and his crew were working on the sales office. The inspection began in the north end of the structure on the first floor. I immediately noted the presence of numerous containers, mostly unlabeled, as well as a yellow metal flammables cabinet. A stream of liquid appeared to be originating from the bottom of the cabinet, which was surrounded by containers and not able to be opened.

In the northeast corner of the first floor, five black 55-gallon open head drums were noted. These containers allegedly contain the soil from the borings which were done during a Phase 2 investigation prior to the current owner's purchase of the site, which closed on October 31, 2006.

On the east side of the first floor, about 50 apparently empty plastic drums were shrink-wrapped together on pallets, some labeled as perchloroethylene. On the third floor, east side, a single red metal closed-head drum was present, which was unlabeled. Stenciled on the side of the drum was the lettering "Macoma 73, NCC authorized, Bureau of Explosives". Chester did not have knowledge of the contents of this drum. No waste determinations or manifests were kept on-site.

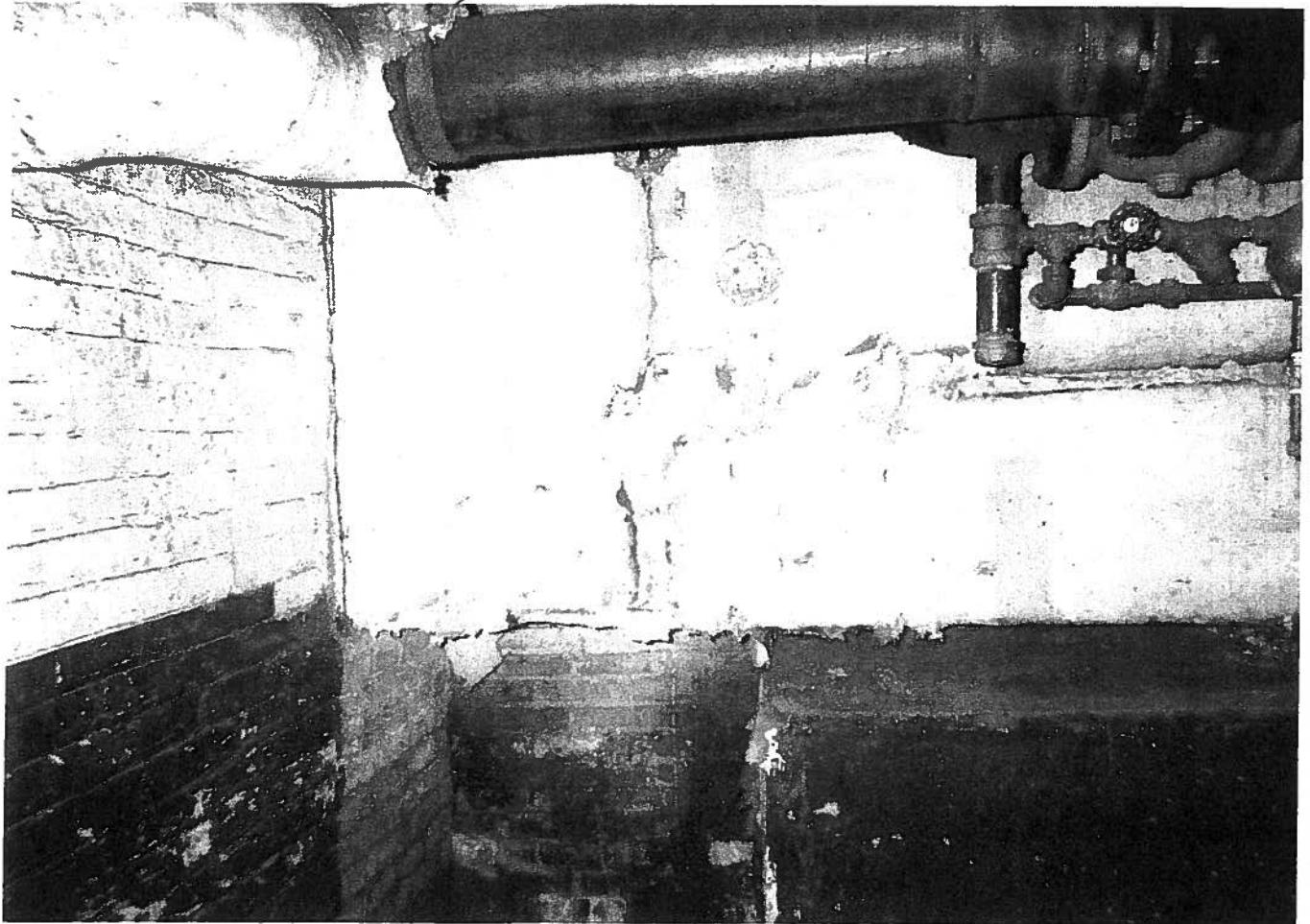
An additional observation during the inspection was the presence of what appeared to be asbestos, hanging in multiple locations throughout the structure. A storage box also contained what appeared to be asbestos which had been removed. I did place a call to Stanley Kaehler and Pete Badilla of Chicago Department of Environment regarding this, and Mr. Badilla arrived at the site that afternoon and took samples as well as ordering the building vacated.

Closing Conference

I discussed my observations with Chester, and told him that I would be communicating with Steve Karavolos, who represents the owner of the facility.



EXTERIOR, 1810 W. GRACE ST



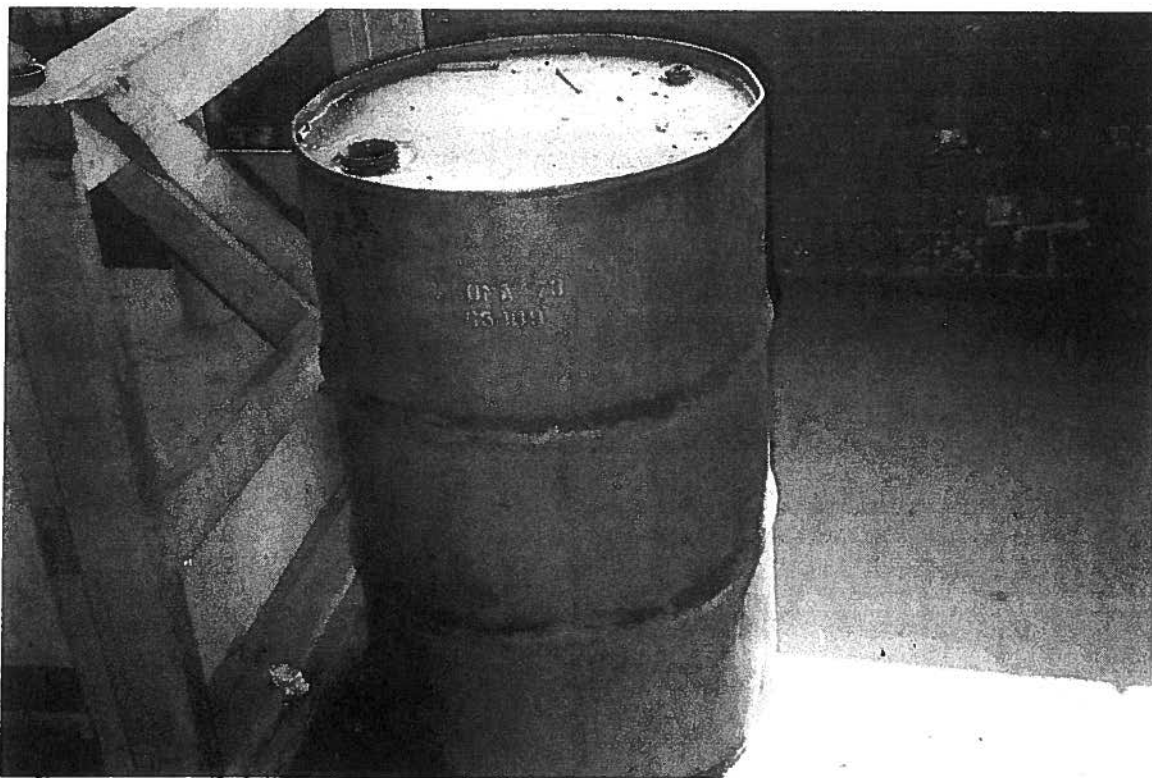
APPARENT ASBESTOS



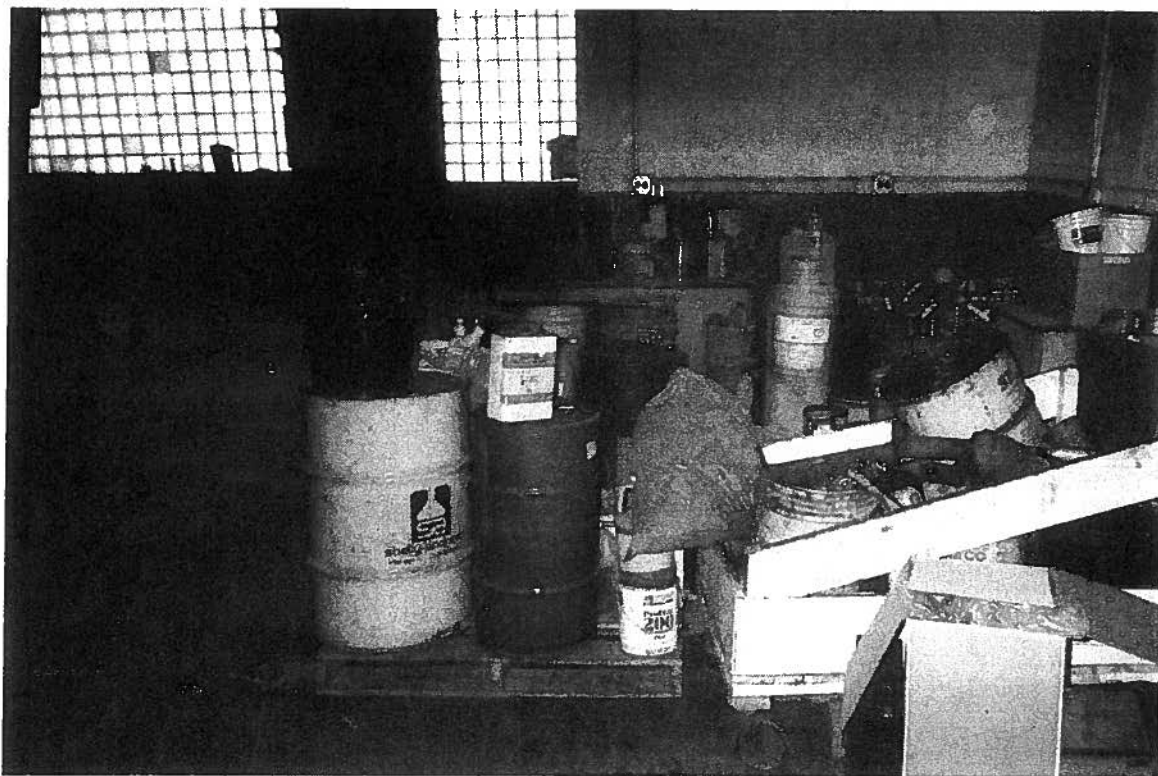
1ST FLOOR, NORTH SIDE - RED FLAMMABLE STORAGE



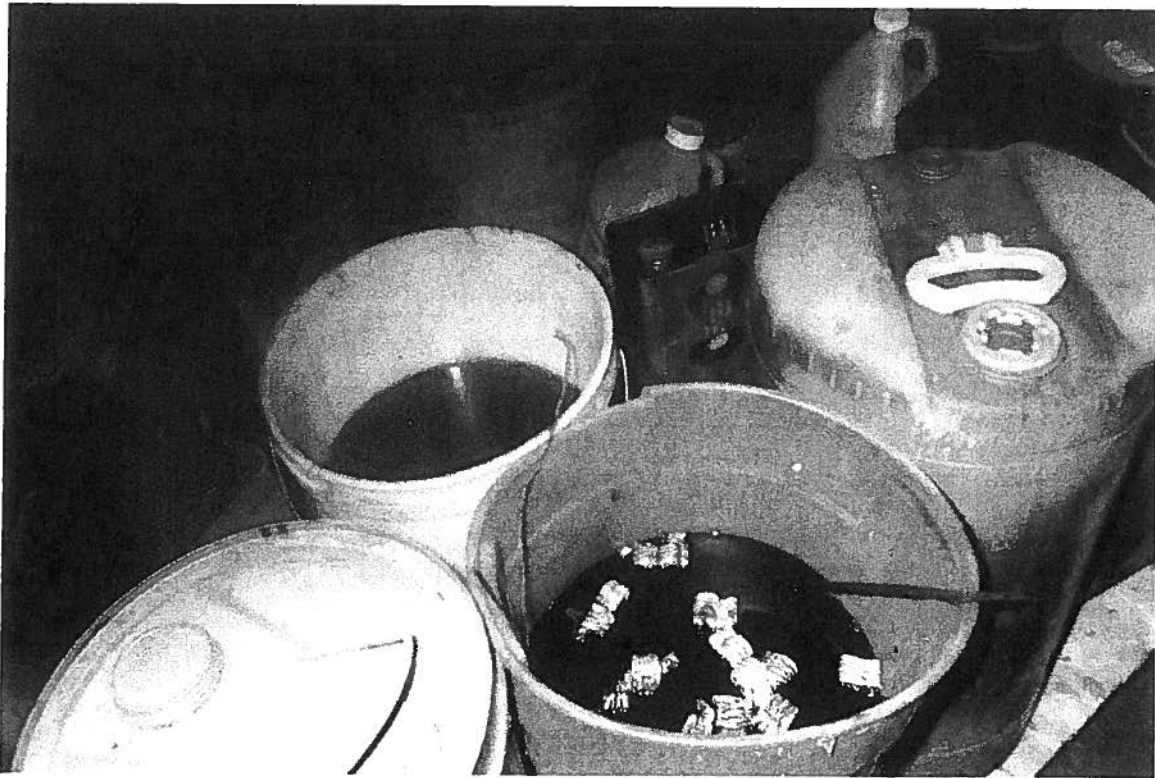
N.E. CORNER, 1ST FLOOR DRUM WITH SOIL CORES



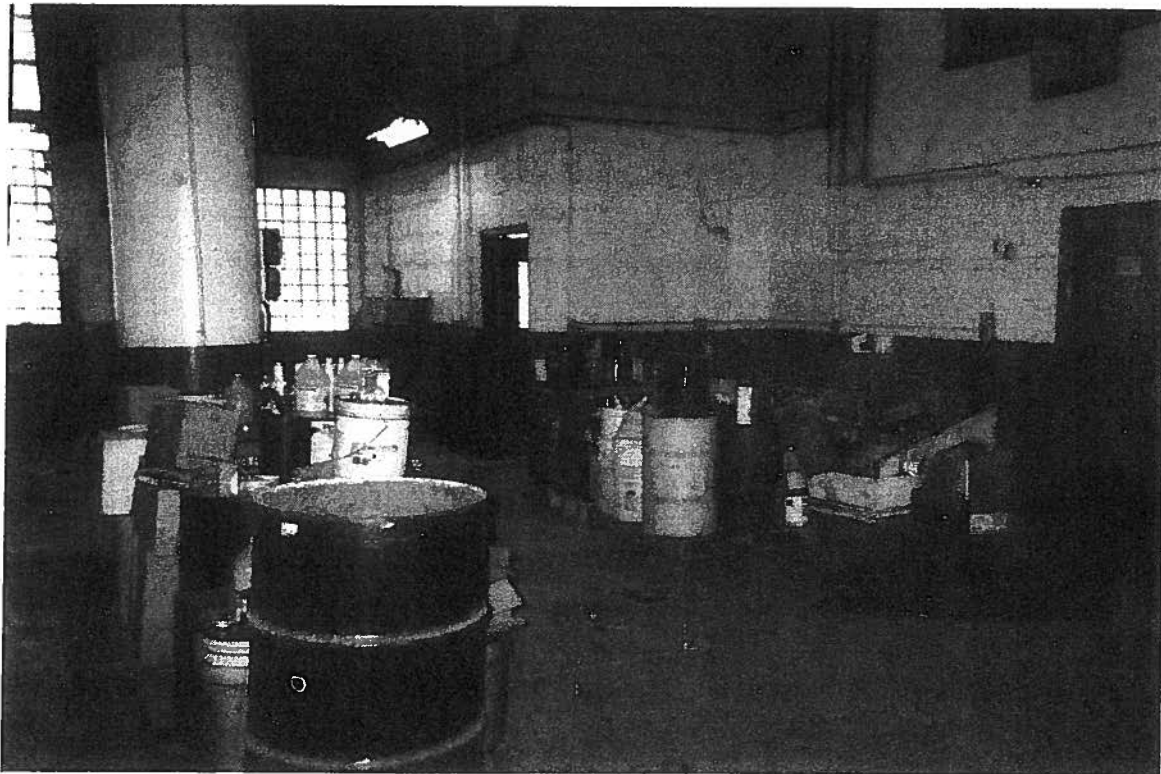
FULL DRUM, 3rd FLOOR



1st FLOOR, NORTH END, UNKNOWN WASTE



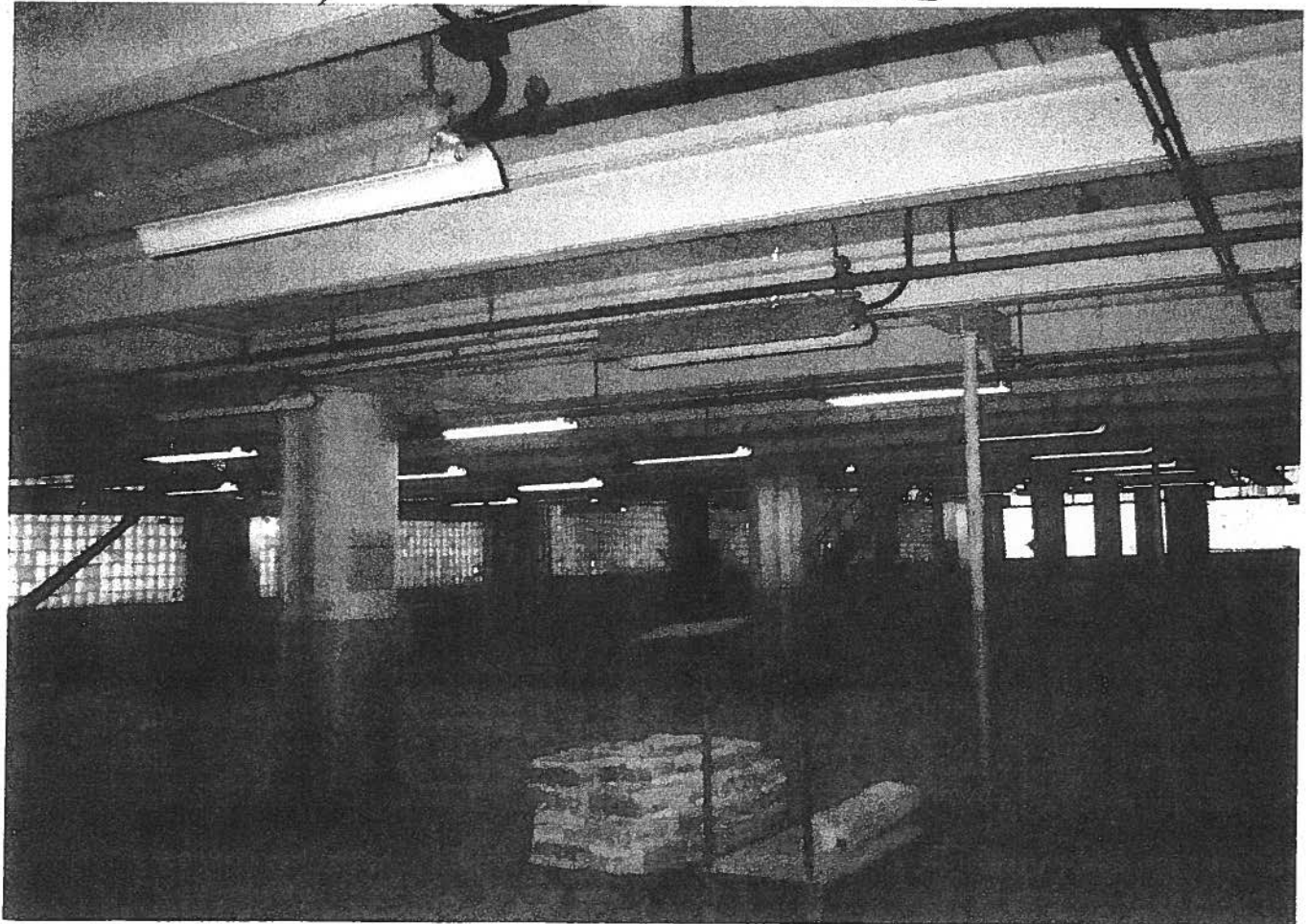
1ST FLOOR NORTH SIDE UNKNOWN WASTE



1ST FLOOR N.E CORNER WASTE
CONTAINERS, UNKNOWN CONTENT



6 DRUMS, NE CORNER 1ST FLOOR



1ST FLOOR, VIEW TO N.W.