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Solutions to the Army Corps of Engineers Proposed Confined Disposal Facility (Pollution Dump) in the 10th Ward

Overview

In August 2020, FOTP (along with Alliance for the SouthEast, Openlands, and Sierra Club IL) submitted lengthy comments detailing deficiencies in the US Army Corps of Engineers’ (ACOE) Dredged Material Management Plan and Integrated Environmental Impact Statement (DMMP/EIS) and provided several alternatives to managing the dredge while avoiding dumping more toxic pollution at the CDF in the 10th Ward or at another site in the 10th Ward.

21st Century Dredge Management Solutions

I. Sedimentation Reduction – Reducing the volume of dredge in the Calumet River and Cal Sag Channel dredge to be managed over time by better upland land management practices.

* The ACOE could utilize barging and industrial facilities that line the Calumet River and Cal Sag channels to holistically respond to dredge management and their current policies encourage this. If sediment reduction occurred, the cost of storing the rest of the materials in a landfill would go down.
* ACOE’s policy requires that they work with local governments to find solutions for dredge management so they should engage the City, County, state of Illinois and stakeholders in a regional planning process that can lead to the adoption of enforceable requirements to reduce industrial and agricultural runoff to the Calment River and Cal Sag Channel.
* The ACOE acknowledges that 50,000 cu. Yards of sediment enters the Calumet channel every year, this is the same number that was used in the ACOE’s 2015 Draft DMMP/EIS so there has likely been an increase due to water levels increasing.
* Alderwoman Sadlowski-Garza noted in her comments to the ACOE in February 2019: “...the Army Corps should consider more robust measures to prevent sediment from entering into the Calumet River. There are currently many sections of severely degraded seawall as well as rocky and unimproved shoreline that convey sediment into the river. A plan to provide green infrastructure to prevent sediment from entering the river and repairing damaged and degraded seawall may help prevent the need for dredging and allow for a smaller site to be used for any containing sediment that cannot be remediated.”

II. Beneficial Reuse of the Cleaner Harbor Dredge – Reducing the volume of overall dredge by beneficially using all of the cleaner Calumet Harbor dredge at off-site locations (rather than disposing all of the dredge at the CDF location).

* ACOE has identified beneficial use opportunities to include wetlands nourishment, engineered soil and use as a product in various manufactured products and they have admitted that there are markets within the Great Lakes and inland Waterway system for beneficial use of the Calumet Harbor dredge yet continue to contradict themselves to say that they must dredge at the facility every year for the next 20 years beginning in 2022.

III. Landfilling the Contaminated Dredge – Barging the remaining contaminated dredge from the Calumet River and Cal-Sag Channel to a transfer location along one of the rivers to then be driven via highway to a permitted landfill.

* Dredged sediments that are not considered “clean” must be managed as “waste” in both Illinois and Indiana and require landfilling of dredged material.
* There is currently capacity in permitted landfills in the greater Chicago Metropolitan area to accept the volume of dredge in the Calumet Harbor, reported to be 25,000 cu yards/year. These facilities are regulated and constructed to safety manage waste.
* The ACOE has barged and trucked wet dredge 160 miles from East Peoria to the Chicago U.S. Steel site for beneficial use.
* The ACOE has barged and trucked contaminated dredge from the ACOE Grand Calumet River project to the Newton Landfill in Indiana (60 miles away).
* Costs of transporting the dredge do not top costs to the ASOE for expanding the CDF which include: real-estate, long-term maintenance, monitoring and liability.