



April 6, 2017

Reference No. 039826-18

Mr. Ramon C. Mendoza
Federal on Scene Coordinator
USEPA Region 5
Superfund Division
Removal Branch 3
77 West Jackson
Chicago, Illinois 60604

Dear Mr. Mendoza:

**Re: Responses to EPA Comments on Draft Removal Action Completion Report
Alley and Railroad
OU1 Pilsen Site
Chicago, Illinois (January 30, 2017)**

General Comments

Comment #1

Please include a good faith estimate of total costs or a statement of actual costs incurred in complying with the AOC.

GHD Response

A new Section 4.11, Removal Action Cost has been added to the report.

Comment #2

Discussion of removal and disposal options considered for those materials should be provided.

GHD Response

Additional text regarding removal and disposal options considered have been added to Sections 4.7 and 4.8 of the report.

Specific Comments

Comment #1

Page 1, Section 1.1.1, Area 1 - Are the lengths and widths provided surveyed distances? Area 1 excluding the parking lot driveway area is approximately 435 feet long.

GHD Response

The distance cited was the overall length including the parking lot driveway. Text has been revised to exclude the driveway as suggested.



Comment #2

Page 2, Section 1.1.1, Area 6 - "This part is approximately 110 feet by 15 feet in area with a 110 foot long section of railroad tracks used by BNSF and owned by H. Kramer."

GHD Response

The comment is accepted. The report text has been revised to include the area width.

Comment #3

Page 2, Area 9 - The text indicates the "poor shape" of Area 9. But then on the very next page they note Area 9's "good condition." Please clarify.

GHD Response

Area 9 includes pavement in the western half in poor condition, and pavement in the eastern half in good condition. The report text has been modified to reflect two separate areas of pavement within Area 9.

Comment #4

Page 3, Section 1.2, 1st bullet – The Area 5 revised TCLP soil zone was excavated to brick pavers approximately 0-6 inches below grade. The remainder of Area 5 was graded only.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #5

Page 3, Section 1.2, 5th bullet - Area 6 and 7 were excavated and graded to approximately 6" below grade. Excavated soil from Area 6 and 7 was stock piled in Area 5 and transported off-site for disposal. Area 8 and 9 were graded only but excess graded soil was transported off site for disposal.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #6

Page 4, Section 1.3, 2nd bullet - Change "Geofabric and asphalt covers" to "Geofabric, gravel, and asphalt covers". Change "protective barrier2" to "protective barrier2".

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.



Comment #7

Page 4, Section 3, 3rd bullet – Change “join” to “joint”.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #8

Page 4, Section 3, 7th bullet - Stabilization of lead and cadmium impacted soil (Areas 4 and 8) exceeding the TCLP lead criteria (5.0 milligrams per liter (mg/L) and cadmium (1.0 mg/L) regulatory levels (Code of Federal Regulations [CFR] Title 40 Part 261 Section 24 Toxicity Characteristics).

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #9

Page 4, Section 3, 9th bullet - Excavation of contaminated soil exceeding cleanup levels: EPA industrial soil RML for lead of 800 mg/kg, CFR Toxicity Characteristics TCLP lead criteria (5.0 mg/L), and CFR Toxicity Characteristics TCLP cadmium criteria (1.0 mg/L) regulatory levels.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #10

Page 4, Section 3, 10th bullet - Change to "Off-Site disposal of non-hazardous contaminated soil".

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #11

Page 5, Section 4.1, 4th bullet - Soil stabilization of lead and cadmium impacted soil in Areas 4 and 8 exceeding the CFR Toxicity Characteristics TCLP lead criteria (5.0 mg/L) and cadmium criteria (1.0 mg/L) regulatory levels.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #12

Page 6, Section 4.2, 2nd paragraph – Change “mobilized to the on” to “mobilized to the Site on”. Change “a small grew” to “a small crew”.



GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #13

Page 8, Section 4.4, 1st paragraph – to below the CFR Toxicity Characteristics TCLP lead criteria (5.0 mg/L), and CFR Toxicity Characteristics TCLP cadmium criteria (1.0 mg/L) regulatory levels.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #14

Page 8, Section 4.4, 2nd paragraph – Change “disposal” to “disposal as non-hazardous soil waste”.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #15

Page 8, Section 4.4, 5th paragraph – One stock pile of treated soil was the eastern 50 feet of the Area 8 TCLP lead soil, the second stock pile of treated soil was the western 50 feet of the Area 8 TCLP lead soil.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #16

Page 9, Section 4.4, 7th paragraph – Change “eastern portion of Area 8” to “eastern 50 feet of the Area 8 TCLP lead soil”.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #17

Page 9, Section 4.4, 8th paragraph – Change “western portion of Area 8” to “western 50 feet of the Area 8 TCLP lead soil” throughout the paragraph. December 2, 2015 confirmation samples included one 5pt composite collected from the eastern 30' and one 5pt composite collected from the western 20' of the western 50' of the Area 8 TCLP soil. After the treatment on 12/8/15, one 7pt composite confirmation sample was collected from western 50' of the Area 8 TCLP soil on 12/8/15.



24hrs later one 5pt composite confirmation sample was collected from western 50' of the Area 8 TCLP soil on 12/9/16.

GHD Response

The comments are accepted. The report text has been corrected to reflect the comment.

Comment #18

Page 10, Section 4.6, Area 4 – Change “treated soil was excavated” to “treated soil was excavated to 6" below grade”. Change “disposal” to “disposal as non-hazardous soil waste”.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #19

Page 10, Section 4.6, Area 5 – Include information that the revised Area 5 TCLP lead soil zone was excavated to the brick pavers approximately 6" below grade. The revised Area 5 TCLP lead zone soil above the brick pavers was not treated with Free Flow 200. Remainder of Area 5 was graded following removal of stock piled soil and prior to placement of an asphalt cover.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #20

Page 10, Section 4.6, Area 6 – Excavation work was conducted to approximately 6" below grade.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #21

Page 10, Section 4.6, Area 7 – Excavation work was conducted to approximately 6" below grade.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #22

Page 10, Section 4.6, Area 8 – Change “The results” to “The initial results”.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.



Comment #23

Page 11, Section 4.6, Area 8 – Change “disposal” to “disposal as non-hazardous soil waste”.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #24

***Page 11, Section 4.7 – Change “soil from Areas 4 and 8” to “TCLP lead soil from Areas 4 and 8”.
Appendix J does not include loads shipped on 12/29/2015.***

GHD Response

The comment is correct. The report text and Appendix J has been corrected to reflect the comment.

Comment #25

Page 11, Section 4.8 – Change “A surveyor placed stakes were along” to “Surveyor placed stakes were” or “A surveyor placed stakes along”.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #26

Page 12, Section 4.8 – Change “section 4.5” to “section 4.6”.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #27

Page 12, Section 4.9 – Although Area 1 was not paved still provide engineered barrier information for Area 1. Gravel depths were deeper than 6" in the Area 8 TCLP lead soil excavation.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

Comment #28

Figure 3 – Change “3” Compacted Gravel” to “6” Compacted Gravel”. Gravel depths were greater than 6" in Area 8 TCLP lead soil excavation, may need a different engineered barrier cross-section.

GHD Response

The comment is accepted. The report figure has been corrected to reflect the comment.



Comment #29

Table 1 – USEPA Split Result for S-112415-ML-004 was validated and qualified, the validated result was 0.029 J-. USEPA Split Results for S-120815-GW-009 were validated and qualified, validated results were a TCLP lead result of 8.1 J and a TCLP cadmium result of 0.00039 J.

GHD Response

The comment is accepted. The report Table 1 has been corrected to reflect the comment.

Comment #30

Section 5, Page 12 - The certification is incomplete: a) it's missing the second-to-last sentence beginning "I have no personal knowledge," b) Under the AOC, the project coordinator (Pochron) must certify the report. Although Ron Frehner can sign the report, he cannot provide certification under the AOC as he is neither the project coordinator nor a responsible corporate official of H. Kramer.

GHD Response

The comment is accepted. The report text has been corrected to reflect the comment.

If you have any questions regarding this monthly progress report, please do not hesitate to contact us.

Sincerely,

GHD

A handwritten signature in black ink that reads "Walter J. Pochron". The signature is written in a cursive, flowing style.

Walter J. Pochron

WJP/lg/44

Encl.