U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Pullman Yards - Removal Polrep
Initial and Final Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #1**
Removal Site Evaluation POLREP
Pullman Yards
Atlanta, GA
Latitude: 33.7586700 Longitude: -84.3281150

To: Jim McGuire, USEPA R4 ERRB

From: Jeffery Crowley, On-Scene Coordinator
Date: 7/21/2011
Reporting Period: May 2011 - July 2011

1. Introduction

1.1 Background

Site Number:		**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Assessment
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:		**Start Date:**	
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

CERCLA Incident Category: Transportation/Inactive Production Facility

1.1.2 Site Description

The Pullman Yards Site is a 26 acre property located in the Kirkwood neighborhood of Atlanta, GA. The Site operated as a train yard and sandblasting/paint facility from as early as the 1890's. It was operated in this capacity until the 1960s. After this time the property was used for several operations until stopped in the late 1990s. The concern at the Site stems from the former operation of sandblasting railcars to remove lead-based paint. The sand was used to fill in areas of the Site.

1.1.2.1 Location

The Pullman Yards Site is located at 225 Rogers Street, Atlanta, Dekalb County, Georgia. It is bordered by Toomer Elementary School to the South, rail lines to the north, residential land to the east and a mixture of residential and commercial property to the west. There is also a small creek that runs down the eastern border of the Site. Rogers Street forms the western boundary of the property. The Site is currently owned by the Georgia Building Authority (GBA), a state agency.

1.1.2.2 Description of Threat

As mentioned earlier, the Site operated at one time as a maintenance and training facility for the Pullman Company. The main contaminant of concern at the Site was lead that stemmed from the sand blasting of railcars painted with lead-based paint. The sand was collected on Site and used as fill material at various location on the Site. GBA conducted a removal action in late 2007 to remove some of the stockpiled sand from the Site. At that time approximately 5,800 tons of impacted sand were removed. However, during the sale process for the land, it was found that there was still lead contamination left on-site. Another concern is the proximity of the elementary school to the south of the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The Pullman Yards Site was referred to EPA Emergency Response and Removal Branch in March 2011 by the Superfund Remediation and Site Evaluation Branch (SRSEB) and EPA Brownfields for a Removal Site

Evaluation (RSE).

The first phase of the RSE was focused on the Pullman Yards Site. On May 10-11, 2011 EPA OSC Crowley and members of Superfund Technical Assessment and Response Team (START) conducted an assessment at the property. *In situ* soil screening was conducted at 73 locations using portable X-Ray Fluorescence (XRF) technology. The values obtained were compared to the Removal Screening Levels (RSL) for lead of 400 mg/kg (ppm). Of the 73 samples, 11 were sent to a laboratory for analysis. The screening data identified 4 areas on site where contamination was above the RSL and the Removal Action Level (RAL) as well. These areas area as follows:

1. The northwest corner of the Site where the average screening value was 1,126 mg/kg.
2. The former transfer yard and adjacent building where the average screening value was 1,083 mg/kg. An analytical sample was taken from this area and was 753 mg/kg.
3. Near a former building 15 where the average screening value was 2,621 mg/kg.
4. An area in the southern field area of the Site where the average screening value was 997 mg/kg. Two analytical samples taken from this field were 2,790 and 521 mg/kg respectively.

The last thing conducted during the first phase of the RSE was to collect samples of possible asbestos containing materials located in areas that are open to the environment. Four samples were collected and the results are below:

1. Pipe wrapping in a crawl space on site - Positive
2. Fibrous material on top of bricks stored on site - Negative
3. Tar Paper (roofing material) - Positive
4. Fallen ceiling tiles - Negative

The second phase of the RSE was conducted on the Toomer Elementary School property on June 17, 2011. Screening showed no levels of lead above RSLs or RALs. In addition a soil sample was pulled from the former transfer area and screened for Poly Chlorinated Biphenals (PCBs). The field screen was positive for PCBs above 50 ppm. Analytical results from the lab confirm the presence of PCBs but the levels fall below RALs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

As stated above ERRB has conducted two separate Site Evaluations at the Site. The first focused on the Pullman property itself and the second focused on the Toomer Elementary School property. There is lead and asbestos present at the Site above EPA RALs on the Pullman property. However, no elevated lead levels were found on the elementary school property.

After a review of the data generated from the site evaluation and a review of all site information, ERRB has concluded that the site meets the criteria as set forth in 40 CFR 300.415 (b)(2) for a time critical removal action.

2.1.2 Response Actions to Date

No response actions have been conducted at the Site to date.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The current owner of the Site is Georgia Building Authority. EPA has notified them of their potential liability and will continue to work with them on the cleanup of the Site.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

Lead and asbestos are hazardous substances, as listed in 40 CFR 302.4, and referred to in Section 101 (14) of CERCLA, as amended. Lead contaminated soil and asbestos in onsite debris and exposed pipe wrapping at the Site pose a significant threat to public health. The threat comes primarily from potential human exposure to this hazardous substance. Direct contact and ingestion of these hazardous substances are the primary pathways of exposure. Continued release of these hazardous substances may cause potential chronic health effects to persons living and working nearby.

Lead present in on-site surface and subsurface soils and asbestos in onsite debris and exposed pipe wrapping pose the following threats to public health or welfare as listed in Section 300.415 (b)(2) of the

National Oil and Hazardous Substances Pollution Contingency Plan (NCP):

Section 300.415 (b)(2)(i) Actual or potential exposure to nearby human populations, or the food chain from hazardous substances pollutants or contaminants;

Sampling conducted by EPA confirmed elevated lead levels. EPA Region 4 Technical Services Section (TSS) recommends an RAL of 400 mg/kg lead for residential exposure scenarios. Concentrations exceeding these levels at the Site were confirmed though on-site XRF analysis and laboratory analysis. The maximum lead concentration detected in surface soils was above 2,500 mg/kg.

The Site is located in a mix use neighborhood. There are many homes that border the Site and an elementary school along the southern border of the Site. There were also many holes in the fence and evidence that the Site was used as a cut-through to avoid walking along Rogers St. GBA has since repaired the holes in the fence, but constant monitoring of the fence including repairs to gates and other access points will be needed to adequately secure the Site.

Section 300.415 (b)(2)(iv) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;

Analytical results reveal that elevated lead levels are present at or near the surface creating a potential for migration to off-site locations. Lead concentrations exceeding the lead RAL of 400 mg/kg was confirmed through on-site XRF and laboratory analysis. There is also a creek that runs along the eastern side of the Site that may carry lead-containing sediments off-site.

Section 300.415 (b)(2)(v) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

As stated earlier, the site drains to the east into a small creek. If the contamination is not addressed with a removal action then lead contamination could possibly migrate offsite.

Section 300.415 (b)(2)(vii) The availability of other appropriate federal or state response mechanisms to respond to the release;

Georgia Environmental Protection Division (EPD) is aware of the Site and during a meeting between EPD, GBA, and EPA regarding the Site assessment data, EPD informed EPA that they would like the opportunity to work with potential investors to clean and redevelop the Site. Due to the threat and/or future threat to human health from the hazardous substances, the Site achieves removal eligibility based on the removal criteria listed above; however In the event EPD is not able to clean and redevelop the Site, ERRB will re-evaluate this removal eligibility criteria.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.