

**United States Environmental Protection Agency
Region V
POLLUTION REPORT**

Date: Wednesday, December 8, 2004

From: Mike Ribordy

To: Cheryal Callahan, Village of Gilberts

Subject: Initiation of Action
Gilberts/Kedzie Site
153 Railroad Street, Gilberts, IL
Latitude: 42.1081000
Longitude: -88.3761000

POLREP No.:	1	Site #:	B58R
Reporting Period:	11/15/2004 - 12/03/2004	D.O. #:	022
Start Date:	11/15/2004	Response Authority:	CERCLA
Mob Date:	11/15/2004	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		Contract #	68-S5-03-01
RCRIS ID #:			

Site Description

Based on information provided to the United States Environmental Protection Agency (U.S. EPA) from the Illinois Environmental Protection Agency (Illinois EPA), the Site was originally utilized as a tile manufacturing plant. Clay deposits located on-site were excavated and the clay used for the production of tile. After tile operations ceased, the Site was utilized for battery cracking/lead recycling from at least 1968 to at least 1978. The battery salvage operator reportedly cracked batteries on-site. These battery casings were discarded into the open pits which were originally dug to collect the clay. It has also been reported that the pits were used as municipal waste receptacles.

On October 21, 2003, a below ground surface fire occurred at the Site. U.S. EPA responded to the fire at the request of the Illinois EPA and local fire officials. U.S. EPA's Emergency Response personnel and the Superfund Technical Assistance and Response Team (START) mobilized to the site to provide air monitoring and sampling assistance to the local Fire Department.

As a result of this fire, on December 3, 2003, the Illinois EPA conducted groundwater and soil sampling at or near the Site. Groundwater samples were taken from two private wells on neighboring properties. Soil samples were taken from the area of broken lead acid batteries, the area of the fire, and from the sediment in the pond on Site. Final soil sampling analytical results from the sample collected on December 3, 2003 from the battery casing area at the Site, revealed a 110,000 parts per million ("ppm") total lead concentration, with a concentration of 520 ppm pursuant to the Toxic Characteristic Leaching Procedure ("TCLP"). The final soil sampling analytical results collected from the subsurface fire area at the Site also revealed a 2,400 ppm total lead concentration from the sample collected and 9.3 ppm pursuant to the TCLP. No elevated lead levels were found in the two private wells.

On March 10-11, 2004, the Illinois EPA collected approximately 150 soil samples from the Site. The samples were analyzed using a field-based X-Ray Fluorescence Spectrum Analyzer. The results indicate that significant levels of lead are present at the Site. The maximum level of lead detected was 225,920 ppm, with approximately 40 locations having total lead concentrations above 10,000 ppm.

On March 15, 2004, the Illinois EPA referred the Site to U.S. EPA to conduct a time-critical removal assessment and an emergency removal action to help control access to the Site and/or abate the immediate hazards at the Site.

On March 26, 2004, U.S. EPA conducted a Site inspection to evaluate the need for a removal action. The site is located in a mixed residential/commercial area. Approximately 58 homes are located near the Site. The area of contamination is devoid of most vegetation and is littered with cracked battery casings. There is also an area of burned debris from a fire. Numerous trails lead to the area of contamination. The trails are used by area children for biking, hiking, and riding all-terrain vehicles.

(ATVs). The main trail has markers designating its location. It appears this trail links up with a network of trails which could expand the number of people who may come into contact with the area of contamination. The State sampling data indicates that lead contamination is likely being spread along the trails by the ATVs. The caution tape, which had previously surrounded the area of contamination, was missing in most areas. Talking with area residents and Village officials, it appears the area is extensively used during warmer weather. A tree fort is located approximately 25 yards from the area of contamination. A wetland area and small pond are also located immediately adjacent to the area of contamination and could be susceptible to off-site migration of the lead containing material. An emergency removal action was determined necessary to mitigate immediate threats to public health, welfare, and the environment due to the elevated levels of lead in the surface soils and the accessibility of the property to the public.

On March 30, 2004, U.S. EPA began preparations for installing a chainlink fence around the area of contamination. On April 1, 2004, the acting Emergency Response Branch Chief verbally approved a \$25,000 ceiling for the Emergency and Rapid Response Services (ERRS) contractor to initiate the removal action. The ERRS contractor mobilized to the Site the same day and began installation of the chainlink fence. The fence was completed on April 7, 2004.

Current Activities

Mobilization activities occurred during the week of November 15, 2004. Earth Tech Inc. (ERRS Contractor) established a command post at the site, arranged utility locates for the excavation areas, and the mobilized heavy equipment to the site. Site personnel were mobilized to the site and began clearing and grubbing operations. Metal debris encountered during clearing operations was collected and sent to a scrap metal recycling facility. Pre-excavation planning included the execution of a site survey (plat of survey, mapping, and setting site property corners) and collection of a site soil sample for assessment of on-site treatment of hazardous soil. The process of procuring a vendor for on-site soil treatment was initiated.

On November 18, 2004, Weston Solutions, Inc. (START Contractor) initiated soil delineation activities using a Niton XLP series model X-ray fluorescence (XRF) analyzer. The locations of soil-screening samples were marked and the geographic coordinates were collected using a global positioning system (GPS) unit. The results of the soil delineation activities were used to guide the clearing and grubbing of excavation areas. START drafted a site-specific Field Sampling Plan detailing the confirmation sampling procedures and defining site-specific perimeter air quality standards.

Site activities were halted from November 24 to 28, 2004 in observance of the Thanksgiving holiday. Site activities resumed on November 29, 2004. Clearing and grubbing activities were conducted in identified areas of soil contamination located outside of the fence perimeter. Additionally, to avoid possible damage to residential roads, an alternate pathway for site access for heavy equipment and trucks was identified from Galligan Road. During the week of November 29, 2004 ERRS began to clear and grub an access path to the site from Galligan Road.

Planned Removal Actions

Survey railroad property line and create a topographic map of site to document site drainage so that the site can be properly restored to basically the same proportions and slope that existed prior to commencement of removal activities.

Initiate contaminated soil removal at the locations identified as containing lead and arsenic concentrations above the site cleanup levels.

Perform perimeter air monitoring during excavation activities.

Conduct on-site treatment and stabilization of excavated soil to render soils non-hazardous prior to off-site disposal.

Removal activities will include field-screening using the XRF analyzer, confirmation sampling of the excavated areas, and monitoring of the effectiveness of soil treatment.

Next Steps

Completion of site preparation and haul road construction.

Procure equipment and treatment reagent vendors for on-site treatment operations.

Procure disposal facility for treated soils.

Key Issues

Resolution of Village of Gilberts concerns regarding site work.

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