

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
North Plant MGP - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #3  
Progress  
North Plant MGP  
O5KT  
Waukegan, IL  
Latitude: 42.3737150 Longitude: -87.8243880

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**From:** Brad Benning, OSC  
**Date:** 6/10/2014  
**Reporting Period:** November 2013 to May 2014

**1. Introduction**

**1.1 Background**

<b>Site Number:</b>	O5KT	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	4/8/2013
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	PRP Oversight
<b>Response Lead:</b>	PRP	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	5/6/2013	<b>Start Date:</b>	5/6/2013
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	ILD984807990	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

**1.1.1 Incident Category**

Manufacturing/processing/maintenance - oil and gas refining

**1.1.2 Site Description**

The North Plant site is composed of three parcels (parcels 1, 2, and 4). The former MGP was located on parcel 1.

### 1.1.2.1 Location

The Site is located on vacant land at 849 Pershing Road, Waukegan, Lake County, Illinois. The geographical coordinates for the Site are Latitude 42.3737 north and Longitude -87.8246 west. The Site is bounded to the north by Dahringer Road, on the west by Pershing Road, on the east by the Elgin, Joliet & Eastern Railroad, and to the south by property owned by A.L. Hansen Manufacturing Company. The Site is located about one-half mile west of Lake Michigan.

### 1.1.2.2 Description of Threat

Past data indicates the presence of TCLP benzene concentrations exceeding 0.5 mg/l in addition to concentrations exceeding the 540 mg/kg RML. Depth to groundwater in the area varies from 2-5 feet below ground surface. Groundwater flows east towards Lake Michigan and organics contained in the DNAPL may leach into the groundwater and migrate to Lake Michigan.

### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Several site investigations have occurred at the Site since 1990. Analytical results from historical samples in the proposed removal areas indicate the presence of elevated concentrations of polynuclear aromatic hydrocarbons (PAH) and VOCs in the DNAPL present in both the surface and subsurface.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

On April 8, 2013, EPA executed an Administrative Order by Consent (AOC) under Sections 104, 106(a), 107, and 122 of the Comprehensive Environmental Response, Compensation and Liability Act.

#### 2.1.2 Response Actions to Date

To date, North Shore Gas has notified EPA of its designated contractor and project coordinator. Additionally, North Shore Gas through its General Contractor, Natural Resource Technologies (NRT) mobilized to the Site and ;

- Implemented site security measures
- Constructed a tracking pad and temporary access roads
- Implemented the applicable portions of the air monitoring (Burns & McDonnell)
- Completed assembly of water treatment system
- Initiated excavation and demolition of subsurface foundations/structures
- Implemented erosion control program (James Anderson Co.)
- Disposed of 54,086 tons of soil and debris at Countryside Landfill
- Began ISS process and stabilized 232,922 cubic yards to date (Geo-Solutions, Inc.)

Routine Site Activities include:

#### NRT

- ♣ Manage site security and construction activities with IBS, GSI, WMI, and Burns & McDonnell. Facilitated and participated in daily safety meetings. Management and oversight of GSI's construction efforts.
- ♣ Management and oversight of GSI during full-scale ISS construction.
- ♣ Coordination and scheduling of disposal trucks with WMI and GSI.
- ♣ Prepared Construction Quality Assurance (CQA) samples.
- ♣ Received and reviewed ISS CQA sample test results.
- ♣ Construction survey verification of ISS column locations and elevations.
- ♣ Accompany James Anderson Co. during a weekly erosion control inspections.
- ♣ Monitored site conditions for traffic flow, fugitive dust, odors, and general overall safety. Conduct periodic worker health and safety air monitoring in the work zone.

#### Geo-Solutions Inc.

- ♣ Continue full-scale ISS construction in Removal Action Areas.
- ♣ Receive ground granulated blast furnace slag (GGBFS) and Portland cement for full-scale ISS construction.
- ♣ Implement fugitive emission controls, emission controls include water for dust suppression, Rusmar foam for odor and VOC emissions, and stockpile covering with scrim reinforced plastic. Maintain and administer site exclusion zones, decontamination areas, and site health and safety procedures.
- ♣ Conduct worker health and safety air monitoring in the work (exclusion) zone.

#### James Anderson Company

- ♣ Complete a weekly erosion control inspection. The inspections are performed in accordance with the Watershed Development Permit and the general National Pollutant Discharge Elimination System (NPDES) permit.

#### Burns & McDonnell

Burns & McDonnell is performing ambient air monitoring and sampling along the site perimeter at the Former North Plant MGP Site in accordance with the North Plant MGP Site – Removal Action Work Plan (RAWP). They are completing real time ambient air monitoring 24-hours a day, seven days a week at seven locations (AMS-1 through AMS-7) along the Site perimeter. They are collecting 24-hour perimeter air samples at upwind and downwind locations at the Air Monitoring Stations on a routine basis at frequencies and quantities outlined in the RAWP. Burns & McDonnell is also performing real-time handheld and observation monitoring as described in the RAWP.

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

EPA executed Docket No. V-W-13 C-009, an AOC with North Shore Gas on April 8, 2013.

### 2.1.4 Progress Metrics

Milestone	Date Due	Date Done
Effective Date (ED)		4/8/2013
Contractor Notification	4/22/2013	4/26/2013
Project Coordinator Notification	4/22/2013	4/26/2013
Site Preparation	7/24/2013	7/11/2013
Remove subsurface structures	7/24/2013	8/5/2013
Install erosion controls	7/01/2013	5/10/2013
ISS work completion	8/1/2014	
Site demobilization	9/1/2014	

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

The following sections discuss planned response activities and next steps.

#### 2.2.1.1 Planned Response Activities

During the next reporting period North Shore Gas will continue to follow the activities laid out in the Removal Action Work Plan. An additional area, Parcel 4 has been added to the RAWP, which consists of a triangular portion in the northeast corner of the site currently owned by the adjacent railroad

#### 2.2.1.2 Next Steps

North Shore Gas will continue ISS activities in areas A and B.

Parcel 4 will be added for future ISS work.

Load surface soil and debris for disposal at WMI's Countryside Landfill.

Receive and evaluate ISS CQA data.

Continue perimeter air monitoring.

#### 2.2.2 Issues

Recent emission have been occurring due to the presence of a very pure coal tar zone that is being prepared for ISS work. Additional foam is being utilized to suppress odors and a scented misting system is being installed along the west and north perimeter to help mask the coal tar odor.

## 2.3 Logistics Section

Not applicable (NA)

## 2.4 Finance Section

### 2.4.1 Narrative

Responsible Party (North Shore Gas) is providing all financial resources for the Removal Action.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

EPA has approved the HASP approved by North Shore Gas.

### 2.5.2 Liaison Officer

NA

### 2.5.3 Information Officer

NA

## 3. Participating Entities

### 3.1 Unified Command

NA

### 3.2 Cooperating Agencies

IEPA

City of Waukegan

## 4. Personnel On Site

START - OTIE 1 (Tues thru Thursday)

EPA - 1 (Random visits)

## 5. Definition of Terms

No information available at this time.

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

Additional information can be found at [www.epaosc.org/northplant](http://www.epaosc.org/northplant).

**6.2 Reporting Schedule**

The next PolRep will be issued in August 2014.

**7. Situational Reference Materials**

NA

POLREP #3 Last Updated 6/10/2014