

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Pilsen Soil OU1 Railroad Spur and Alley Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #2
Progress
Pilsen Soil OU1 Railroad Spur and Alley Site
C5N8 OU1
Chicago, IL
Latitude: 41.8535941 Longitude: -87.6610085

To:
From: Ramon Mendoza, On-Scene Coordinator
Date: 11/27/2015
Reporting Period: 11/23/2015 to 11/25/2015

1. Introduction

1.1 Background

Site Number:	C5N8 OU1	Contract Number:	
D.O. Number:		Action Memo Date:	6/22/2015
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	1
Mobilization Date:	11/16/2015	Start Date:	11/16/2015
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical Removal Action

1.1.2 Site Description

The Site consists of an alley (owned by the City of Chicago) and a railroad spur (historically operated by Burlington Northern Santa Fe Railway [BNSF]) located in the Lower West Side (Pilsen) area of Chicago, Cook County. The Site is in the City's 25th Ward. The east to west portion of the alley is approximately 460 feet (ft) long and 18 ft wide (approximately 8,280 square feet [ft²] in area) and is roughly paved with asphalt over 25% of its length from the east side. The north to south portion of the alley is about 110 feet long. The remaining 75% of the alley is soil. The alley connects South Loomis Street and South Throop Street and is south of West 21st Street and north of West Cermak Road. The alley is bordered to the north by H. Kramer and Company (H. Kramer) and Co., the east by South Throop Street, to the south by commercial and industrial businesses, and to the west by the railroad spur and then South Loomis Street.

The railroad spur is approximately 1,120 ft long and 28,215 ft² in total area. The railroad spur consists of an unused rail track and soil and asphalt where it is bisected by South Loomis Street. The western portion of the railroad spur is located in the north region of a property occupied by the Benito Juarez Community Academy (Juarez), located at 1450-1510 West Cermak Road. The railroad spur curves to the south, crosses South Loomis Street, and extends along the west boundary of H. Kramer, located at 1345 West 21st Street. The eastern portion of the railroad spur is bordered by businesses along Loomis Street and West Cermak Road to the south. According to a historical Sanborn fire insurance map, the railroad spur and the alley have existed since at least 1914.

The alley and railroad spur soil (surface soil and subsurface soil) generally consists of silty, clayey, sandy, and gravelly fill materials. In the alley soil, some traces of wood chips, cinders, and pieces of glass, brick, plastic debris, and slag were observed [slag was observed in eight alley soil borings and one railroad spur soil boring]. Slag is a solid-phase waste generated by secondary lead processing. In general, the surface and subsurface railroad soil contained more gravel than the alley soil. The western portion of the railroad spur west of Loomis street also contained vegetation (weeds) and garbage.

See the attached photo to the PolRep, which shows all the 10 areas for the Site.

1.1.2.1 Location

In addition to the information provided in the previous section. The geographical coordinates for the alley portion of the Site are 41° 51' 10.38" North latitude and 87° 39' 35.54" West longitude. The geographical coordinates for the railroad portion of the Site are 41° 51' 13.58" North latitude and 87° 39' 41.66" West longitude. The Site is an industrial site in a residential neighborhood with a portion of it (Western Area of the Railroad Spur west of Loomis Street) located within a ¼-mile of two schools - Juarez and the Manuel Perez Jr. Elementary School (Perez). Two City of Chicago parks are located within a ½-mile-radius of the Site, Dvorak Park and Throop Park.

1.1.2.2 Description of Threat

EPA Removal Site Assessment analytical results document high levels of Lead in soil at or near the surface (which exceed the EPA Removal Management Level of 800 mg/kg for industrial use scenario). Access to the Alley is unrestricted and the fence in portions of the railroad spur is inadequate to prevent trespassers.

The surface soil at the Site has the potential to migrate offsite via wind, rain, vehicular and pedestrian traffic, or manual dispersion and presents a threat of exposure to the residents and workers in the surrounding area.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA conducted a removal site assessment from Dec. 2012 to 2013 in the field and found that average alley surface soil total lead was 2419 mg/kg. Average railroad spur surface soil total lead was 4340 mg/kg. In addition to the high concentrations of total lead, two soil samples from the alley and one from the railroad spur collected from 0 to 6 inches bgs contained TCLP lead at concentrations exceeding the TCLP lead regulatory limit of 5.0 mg/L in 40 C.F.R. § 261.24(b).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Responsible Parties initiated the cleanup on 11/16/2015. EPA OSC and EPA START oversaw the cleanup onsite at all times. The overall goal of the removal action is to remove the threat of lead exposure to surrounding residents and workers from surface soil through: 1) removal of soil contaminated with high levels of lead above the EPA RML, and 2) placement of permanent covers at the Site.

2.1.2 Response Actions to Date

The following are response actions from 11/23 to 11/25/2015. The main goal for the week was to excavate and treat the lead contaminated soil in Areas 4, 5, and 8 that exceeded the TCLP characteristic criteria for lead (5 mg/l) to below the criteria for disposal at a later date. In addition, OSC had requested the previous week that additional areas in Area 2 be capped. Day to day work was as follows:

Monday November 23, 2015:

- EPA OSC, EPA START and H. Kramer contractors (GHD, Hygieneering, RW Collins, start work on-site. GHD is the lead contractor coordinating cleanup in addition to air monitoring and soil sampling for the responsible party (Same contractors were present on-site through Nov. 25).
- The Area 5 area planned for treatment was too close to the H. Kramer daily truck traffic so EPA OSC and GHD adjusted boundaries for TCLP lead treatment area in Area 5 to ensure worker safety. New area 55' west from H. Kramer, east side extends 40' south from northern H. Kramer wall, west side extends 25' south from the northern H. Kramer wall.
- EPA and GHD adjusted boundaries to adjust asphalt cap area in Area 2 for additional coverage (south). Asphalt cap adjusted to 15' south (originally 9 feet) from rail line center on the west side of Area 2 and 17' south (originally 9 feet) from the rail line center on the east side of Area 2.
- RW Collins completed excavation and mixing 0-6" bgs Area 4 soil with Free Flow Heavy Metals Treatment Regent which is phosphate based material which is mixed at a 4% application rate to soil for TCLP lead treatment.
- Hygieneering monitors RW Collins personnel exposure utilizing AirCheck 224-52's to sample for lead and arsenic particulates in air. (11/23-25/2015).

Tuesday November 24, 2015:

- RW Collins completed removal of 0-6" bgs of adjusted TCLP lead treatment area in Area 5. 0-6" bgs of Area 5 TCLP treatment area not impacted with TCLP lead. RW Collins did not conduct Free Flow soil mixing for TCLP treatment of 6-18" bgs as intact brick and concrete barriers were observed 0-6" bgs. **EPA OSC and GHD agreed that the intact brick and concrete barriers are an effective cap for the lead contaminated soil underneath and no treatment of the TCLP soil was necessary at this location since the route of exposure to the TCLP lead soil had been removed.**
- GHD collected 5 point composite samples (for TCLP Lead analysis) from two stock piled Free Flow

treated 0-6" bgs soil piles from Area 4. EPA collected split samples of the composite samples.

- EPA (FIELDS) collected GPS points of adjusted TCLP treatment area in Area 5, adjusted asphalt coverage area in Area 2, and TCLP treatment area in Area 8.

Wednesday, November 25, 2015:

- RW Collins completed excavation and mixing 0-12" bgs of the western 80' of the TCLP lead treatment area soil in Area 8 with Free Flow.
- RW Collins completed excavation and mixing 0-18" bgs of the eastern 20' of the TCLP lead treatment area soil in Area 8 with Free Flow.
- GHD collects two 5 point composite samples, one from the eastern 50' of the TCLP lead treatment area in Area 8 and one from the western 50' of the TCLP lead treatment area in Area 8. EPA collected splits of the 5 point composite samples.

Throughout the reporting period GHD and EPA continued to conduct air monitoring with DataRAM 4 and DustTraks for dust in air. EPA monitored downwind with GHD. GHD has an additional monitoring location upwind with a DustTrak. EPA conducted additional air monitoring with a PDR for dust in air. PDR held by START personnel for continuous monitoring near work areas. The average DataRAM 4 downwind dust particulate reading for this week was 0.0383 mg/m³. The average pDR dust particulate reading for this week was 0.0253 mg/m³. **No action levels (for dust) were exceeded.**

Note: The action levels EPA START developed for the site are 0.812 mg/m³ for Areas 8 and 9, 1.19 mg/m³ for Areas 4, 5, 6, 7, and 10, and 3.19 mg/m³ for Areas 1 and 2.) GHD has a single action level of 0.480 mg/m³. The off-site dust particulate action level is any sustained downwind reading of 0.150 mg/m³ above background or the upwind reading.

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

On 9/29/2015 EPA signed an Settlement Agreement and Order on Consent For Removal Action with the PRPs for the Site: H.Kramer and Company, City of Chicago, and BNSF Railway Company.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Railroad ties (wood)		575 feet			disposal thru energy recovery
Rails (steel)		1150 feet			to be recycled.
Lead contaminated Soil (exceeds TCLP Lead)		105 cubic yards excavated and treated			Soil excavated and treated on-site (estimate)

2.2 Planning Section

2.2.1 Anticipated Activities

EPA and START will continue air monitoring and oversight of response activities onsite to ensure compliance with the Administrative Settlement Agreement and Order on Consent (AOC).

2.2.1.1 Planned Response Activities

For the week of 11/30 to 12/4:

H.Kramer contractors will be working in Area 1 and 2 to remove vegetation and solid waste. Excavation of contaminated soil in Area 1 is also planned. The soil will be shipped to an appropriate disposal facility.

Results will come in to determine if the soil treatment in Areas 4 and 8 are effective. If not additional treatment may be necessary.

2.2.1.2 Next Steps

In addition to the planned and anticipated activities, OSC will continue to work with EPA community relations to address concerns from the community and media as they come.

2.2.2 Issues

Areas 1 and 2 are areas where the homeless in the neighborhood sleep on a daily basis. OSC is walking down the Site daily before work starts as necessary and working with the Alderman's office to ensure safety

of all people at the Site. In addition, crews have found medical waste (needles) and biological waste in addition to the garbage in Areas 1 and 2. EPA and GHD are amending the Health and Safety Plan in the field to ensure worker protection.

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

2.5.1 Safety Officer

Ramon Mendoza, EPA OSC

Matt Lazaric, GHD

2.5.2 Liaison Officer

2.5.3 Information Officer and Community Relations

Philippa Cannon, EPA (PIO support)

Clarke, Rosita, EPA (Community Relation).

Leon, Heriberto, EPA

3. Participating Entities

3.1 Unified Command

None

3.2 Cooperating Agencies

City Department of Transportation

Alderman Solis Office (City of Chicago)

4. Personnel On Site

Pilsen OU1 Removal – Personnel Counts							
Date	BNSF	DF Rail Group	EPA	GHD	Hygieneering	RW Collins	START
11/23/15	–	–	1	2	1	4	1
11/24/15	–	–	1	1	1	4	1
11/25/15	–	–	1	2	1	4	1

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.