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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #7**
FINAL
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: 4/13/2018
Reporting Period: August 2016 to April 12, 2018

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:	7/11/2016	**Completion Date:**	4/12/2018
CERCLIS ID:	ILN000504472	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time Critical Removal Action

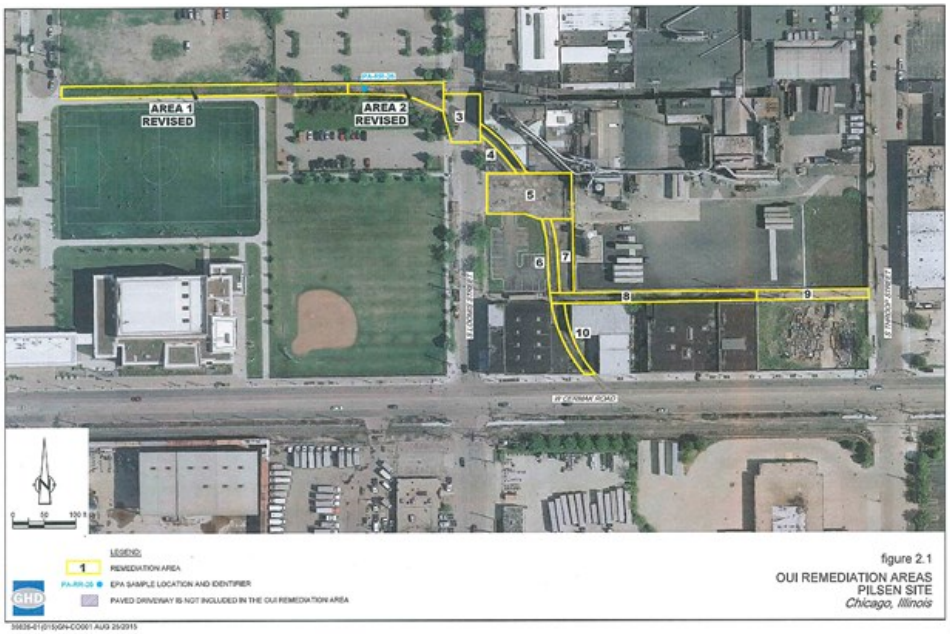
1.1.2 Site Description

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 [ft^2] 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 ft^2 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, 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.

These aforementioned areas have been divided into 10 Areas as shown below (Please note that Area 1 east is the portion directly north of the baseball field.) :



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 [RML] 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

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

The Responsible Parties initiated the cleanup at the Site on 11/16/2015. EPA OSC and EPA START oversaw the cleanup onsite. 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

Response actions taken from 11/16 to 12/30/2015 are summarized as follows: High levels of lead contaminated soil (above the hazardous waste characteristic) were excavated, treated (to non-hazardous waste) and disposed offsite at a permitted landfill in Areas 4 and 8. In addition, low levels of lead contaminated soil (non-hazardous) were excavated and disposed offsite at a permitted landfill. Solid waste, vegetation, most rail ties and rail were also removed. All areas were

graded with gravel cover with an underlying geotextile fabric for preparation for asphalt, except for Area 1 west where a final gravel cover was completed. Since the Asphalt plants closed in November, work crews temporarily demobed on 12/30/2015, with plans to return in April 2016.

Response actions were taken from April 1 to July 6, 2016 and Documented in previous POLREPs 1-6. In summary, except fo the western portion of Area 1, (which was covered with an eathen cap) an engineered asphalt cover was installed and completed in Eastern portion of Area 1, 2, 4,5,6,7,8,9, and 10. The primary cap construction crews have de-mobilized from the Site.

A repair crew from the City of Chicago returned on August 22, 2016 to repair the NE corner of Area 5.

H. Kramer contractors (GHD) completed the final survey of the Site in Sept. 2016.

GHD submitted its Draft Removal Completion Report (Dec. 6, 2016) which documented work conducted. EPA Reviewed and after addressing the EPA comments, the document went final and was approved and finalized April 6, 2017.

A final inspection of the engineered covers was conducted by the EPA OSC on April 12, 2018. No damage was observed and the Covers are in good condition. Photos are attached to this report.

2.1.2.1 Post Closure Removal Site Control - Sept 2016 to April 2018 :

During this period the responsible parties to the EPA Settlement and Agreement on Consent (AOC)drafted plans for post closure removal site controls for EPA review and concurrence. The controls were developed to meet the requirements under the AOC to ensure that the cover systems installed are maintained. Extended time was was granted by the EPA OSC since the controls require entering into environmental covenants which require review and signatures from multiple parties such as the Illinois EPA , Cook County, US EPA, responsible parties and the City of Chicago.

Overall, there are Environmental Convenants were signed by US EPA for : 1) Area 10 (August 18, 2017) ; 2) Areas 4 &6, (April 20, 2017); 3) Area 2 (April 5, 2018).

On January 12, 2018, the City of Chicago Dept. of Transportation Commissioner signed a letter (to the USEPA) committing the City to implement post removal site controls for the unparceled city owned properties for Areas 1,5,7,8&9.

2.1.2.2 - Notice of Completion - On Feb 20, 2018, EPA OSC sent an final letter to GHD/Project Coordinator : Notice of Completion of Work for the Pilsen Soil Operable Unit 1Railroad Spur and Alley Site.

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

On 9/29/2015 EPA signed an Settlement Agreement and Order on Consent (AOC) For Removal Action with the PRPs for the Site: H.Kramer and Company, City of Chicago, and BNSF Railway Company. Response Actions described in this report were taken in accordance with the AOC.

2.1.4 Progress Metrics

Regional Metrics		
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	N/A
	Cubic yards of contaminated sediments removed and/or capped	N/A
	Gallons of oil/water recovered	N/A
	Acres of soil/sediment cleaned up in floodplains and riverbanks	N/A
Stand Alone Assessment	Number of contaminated residential yards cleaned up	N/A
	Number of workers on site	8
Contaminant(s) of Concern	Lead	
Oil Response Tracking		
Estimated volume	Initial amount released	N/A
	Final amount collected	N/A
CANAPS Info	FPN Ceiling Amount	N/A
	FPN Number	N/A
	Body of Water affected	N/A

Administrative and Logistical Factors (Place X where applicable)					
	Precedent-Setting HQ Consultations (e.g., fracking, asbestos)	X	Community challenges or high involvement		Radiological
	More than one PRP		Endangered Species Act / Essential Fish Habitat issues		Explosives
	AOC		Historic preservation issues	X	Residential impacts
	UAO		NPL site		Relocation
	DOJ involved		Remote location		Drinking water impacted
	Criminal Charges Have Been Filed*		Extreme weather or abnormal field season	x	Environmental justice
	Tribal consultation or coordination or other issues		Congressional involvement		High media interest
	Statutory Exemption for $2 Million		Statutory Exemption for 1 Year		Active fire present
	Hazmat Entry Conducted – Level A, B or C		Incident or Unified Command established		Actual air release (not threatened)

Green Metrics		
Metric	**Amount**	**Units**
Diesel Fuel Used	N/A	gallons
Unleaded Fuel Used	N/A	gallons
Alternative/E-85 Fuel Used	N/A	gallons
Electricity from electric company	N/A	kWh
Electric Company Name and Account #	N/A	
Electricity from sources other than the electric company	N/A	kWh
Solid waste reused	N/A	
Solid waste recycled	N/A	
Water Used	N/A	gallons

**Removal program received this infomation from CID* NO

The following Solid Wastes were transported and disposed off-site (Completed by July 2016)

Pilsen Soil Ou1 Area Name	**Lead Contaminated Soil Excavated and Disposed**	**Disposal Facility**	**Comment**
Area 1	175.3 cubic yards	Laraway RDF, Waste Management (Joliet, IL)	Excavated for grading and to meet cleanup goal.
Area 2	60.4 cubic yards	Laraway RDF, Waste Management (Joliet, IL)	Excavated for grading
Area 4 (Treated for TCLP Lead)	31.8 cubic yards	Laraway RDF, Waste Management (Joliet, IL)	
Area 8 (Treated for TCLP Lead)	73.2 cubic yards	Laraway RDF, Waste Management (Joliet, IL)	
Area 8	97.4 cubic yards	Laraway RDF, Waste Management (Joliet, IL)	Excavated for grading
Area 6 & 7	162 cubic yards	Laraway RDF, Waste Management (Joliet, IL)	Excavated for grading
Total	**600.1 cubic yards**		

Waste Stream	***Medium***	***Quantity***	***Manifest #***	***Treatment***	***Disposal***
Railroad ties (wood)		575 feet			disposal thru energy recovery, Staged BNSF Yard (Chicago)
Rails (steel)		1150 feet			recycled.

Solid waste (Garbage and Vegetation)		38.8 tons			---------- Shred-Al solid waste transfer station (Chicago)

2.2 Planning Section

2.2.1 Anticipated Activities

All Site work has been completed.

2.2.1.1 Planned Response Activities

None.

2.2.1.2 Next Steps
None

2.2.2 Issues

None

2.3 Logistics Section
None

2.4 Finance Section
No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

Ramon Mendoza, EPA OSC,

Walt Pochron, GHD, Project Manager

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 (Community Relation).

Muhtsun, Ruth (Community Relation).

3. Participating Entities

3.1 Unified Command

None

3.2 Cooperating Agencies

City of Chicago Department of Transportation
City of Chicago Department of Health
Chicago Public Schools
Agency for Toxic Substances and Disease Registry
Alderman Solis Office (City of Chicago)

4. Personnel On Site
None

5. Definition of Terms
No information available at this time.

6. Additional sources of information
6.1 Internet location of additional information/report

https://www.epa.gov/il/pilsen-area-soil-site

6.2 Reporting Schedule

None

7. Situational Reference Materials

No information available at this time.