

United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Tuesday, August 22, 2006

From: Tom Cook

To:	Sally Jansen, U.S. EPA	Stephen Mendoza, U.S. EPA
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Subject: Ongoing Site Activities
Ingersoll Removal
1000 W 120th street, Chicago, IL
Latitude: 41.6764000
Longitude: -87.6469000

POLREP No.:	13	Site #:	B5CW
Reporting Period:	August 1-21, 2006	D.O. #:	0057
Start Date:	1/18/2006	Response Authority:	CERCLA
Mob Date:	1/18/2006	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		Contract #	68S50306
RCRIS ID #:			

Site Description

The detailed site description can be found in POLREP #1

Current Activities

ERRS conducted ACM removal in Building 914 for this reporting period. Approximately 1,230 linear feet and 1,300 square feet of ACM and surface material were removed from Building 914. To prevent the release of ACM fibers into the atmosphere during removal work, ERRS covered the doorways and windows of Building 914 with poly sheeting and used water to suppress dust. Continuous personnel and work zone perimeter air monitoring was conducted by START during removal activities. ACM debris generated during the removal has been double-bagged, labeled, and consolidated into a 30 cubic yard roll-off box on site. To date a total of 14,070 linear feet of ACM has been removed from approximately 21 Buildings.

ERRS completed excavation of contaminated sludge and debris from the center conveyor pit in Building 912 during the previous Pollution Report reporting period. Since then, ERRS has backfilled the pit with course aggregate and stone. ERRS has also excavated and backfilled furnace pits 4, 5, and 6 in Building 924. Debris removed from these areas was stockpiled in Buildings 912 and 924.

During this reporting period, ERRS continued the final cleanup process of the wastewater holding area. On August 17, 2006, sludge that was moved to the sump area during initial cleanup (July 11-12 and 25 2006) was containerized into three 55-gallon metal drums for later disposal. During this cleanup, ERRS also pressure washed the sump floors and walls. Clean Harbors was on site during cleanup to pump remaining water from earlier rain showers and cleanup activities into a tanker truck for transportation off site and disposal.

During this reporting period, approximately 22,600 gallons of wastewater (oily rainwater) were hauled off site to the Clean Harbors Services, Inc. treatment facility in Chicago, IL. Loads were transported on August 14-17, 2006. To date, a total of 359,359 gallons of wastewater have been transported off site for disposal.

On August 21, 2006, Clean Harbors notified the ERRS Response Manager (RM) that the load pumped from the wastewater holding area on August 17, 2006 contained 25 parts per million (ppm) PCBs. The RM immediately updated the Clean Harbors waste profile to include oily water with 5-25% PCBs for all future wastewater loads.

Only one 30-cubic yard roll-off box of ACM was transported off site to Allied Waste for disposal (on

August 14, 2006) during this reporting period. To date a total of 210 cubic yards of ACM has been disposed of off-site.

Following the incident on July 25, 2006 involving an ERRS worker falling into a pit in Building 912, ERRS continues to implement the following corrective action measures on site:

- ♣ All open pits in Building 924 are being backfilled as soon as possible;
- ♣ Plywood coverings are being installed over pits and manholes that cannot be backfilled immediately;
- ♣ All plywood pit coverings will include a 12-inch perimeter overlap;
- ♣ All pits, manholes and holes within work areas have been marked with additional caution tape and highly-visible spray paint;
- ♣ The use of the buddy system at all times on site has been re-emphasized.

Air Sampling and Monitoring:

At the request of the OSC, START continued to collect daily asbestos air samples from the breathing zone of ERRS laborers and the perimeter of the work area on the days that asbestos removal work was being performed during the reporting period. One asbestos air sample was collected daily from one ERRS laborer and four or five samples were collected from around the perimeter of the work area. Typically, the perimeter samples covered all four compass directions and one additional location. The ERRS workers are encouraged to wet the ACM prior to removal to reduce the amount of airborne ACM fibers.

During this reporting period, ERRS conducted ACM removal in Building 914. The entire building is considered the exclusion zone; therefore all perimeter pumps were setup outside the building. During this removal, the personnel pump was reported overloaded on five consecutive work days from August 10 to 17, 2006. The perimeter pumps were also reported overloaded on three separate occasions, August 1, 10 and 15, 2006. On August 16, 2006, all five samples (personnel and perimeter) were reported overloaded. Results from samples that were not overloaded during the reporting period indicated that levels of asbestos in air are inside and outside the work zone were below permissible exposure levels.

Following collection of the overloaded samples, the OSC recommended that ERRS continue to use water for dust suppression and take steps to reduce the possibility of ACM pipe wrap falling to the floor. In addition, since the lab reported that most of the overloaded perimeter filters appeared to have been impacted by dust and debris, the OSC requested that the perimeter pumps be placed so that they will not be impacted by dust produced by roadway or heavy equipment traffic.

Due to the continuous change in work activities, the number of interconnected buildings on site, and the overloaded filters, the OSC has recommended that the workers continue to dress in Level C PPE while performing asbestos removal work.

START conducted air monitoring with a MultiRae® five-gas photo-ionization detector (PID) on August 17, 2006. Monitoring was done while sludge material from the wastewater holding area was containerized into 55-gallon metal drums and the area was pressure washed. The VOC, CO₂, H₂S, LEL and oxygen level readings for the workers' breathing zones were at or below background levels.

Liquid Sampling:

On August 18, 2006, during debris removal in Building 1018, ERRS discovered four pits, one trench, one manhole and an underground storage tank (UST) along the south wall of Building 1018. The UST was mainly filled with oil and the other elements appeared to be filled with water. START took a total of seven liquid samples from these areas (UST001-1018-0818, MH002-1018-0818, PT001-1018-0818, PT002-1018-0818, PT003-1018-0818, PT004-1018-0818, TR001-1018-0818). Each location was sampled for PCBs (aqueous and in oil) and VOCs and sent to Microbac Laboratories in Merrillville, Indiana. The manhole and the UST were also analyzed for SVOCs. Analytical results for these samples are pending.

Wipe Samples:

START also took a wipe sample (WP001-1018-0818) along the south wall of the trench in Building 1018. The sample was sent to Microbac Laboratories for PCB analysis. The analytical result for this sample is pending.

Solid Samples:

No solid samples were collected during this reporting period.

For additional information regarding site activities, see Data Summary in the documents section.

Planned Removal Actions

To mitigate the threats to human health and the environment posed by conditions at the Former Ingersoll Site, the U.S. EPA plans to:

- Fortify and maintain site security to prohibit the public from entering the site;
- Evaluate the nature of liquid in on-site sumps, pits, vaults, basements, and manholes, and remove and dispose of contaminated liquid and sediment from those areas;
- Evaluate transformer pads for PCB contamination and remove those pads that are contaminated;
- Decontaminate surfaces contaminated with PCBs; and
- Evaluate the exposure of nearby populations to asbestos fibers that may migrate from the site property and remove the ACM from the site.
- Wipe samples for PCBs will be collected from the wastewater holding area.

Samples for PCBs will be collected from the sludge that was collected from the wastewater holding area.

Next Steps

Continue with ACM removal;

- Continue stockpiling debris and floor scrapings from within facility buildings;
- Continue the extent of contamination survey of on-site sumps, pits, vaults, basements, and manholes containing liquid as well as potentially impacted soil;
- Continue de-watering contaminated liquid from sumps, pits, vaults, basements, and manholes;
- Continue power washing surfaces, excavation of pits and trenches, and backfilling open pits and trenches with clean fill;
- Continue collecting air samples for asbestos from worker breathing zones and work zone perimeter;
- Continue to document site activity and conditions;
- Evaluate analytical results from samples collected on-site as they become available; and
- Continue transportation and disposal of liquid and solid waste.

Key Issues

- Meeting transportation and disposal analytical requirements for debris and floor scrapings that have been stockpiled;
- Handling contents of on-site sumps, pits, vaults, basements and manholes that may contain standing or running liquid with potentially elevated levels of toxic and hazardous constituents;
- Covering remaining manholes, pits and trenches;
- Maintaining health and safety protocols; and
- Taking all proper measures to keep airborne asbestos and lead contamination below OSHA and EPA standards.
- Monitoring overloaded air samples

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