

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

Date: Monday, September 11, 2006

From: Tom Cook

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Subject: Ongoing Site Activities
Ingersoll Removal
1000 W 120th street, Chicago, IL
Latitude: 41.6764000
Longitude: -87.6469000

POLREP No.:	14	Site #:	B5CW
Reporting Period:	August 22-September 8, 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 completed ACM removal in Building 914 removing approximately 1,470 linear feet and 2,170 square feet of ACM and surface material. 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. During this reporting period, only one 30-cubic yard roll-off box of ACM was transported off site (August 23, 2006) to Allied Waste for disposal.

Ingersoll's ACM removal activities were temporarily suspended on August 28, 2006. ERRS are focusing on debris cleanup and consolidation as well as TSCA waste disposal. However, the majority of ACM removal has been completed and ERRS expect to resume removal activities in only a few localized areas. To date, the entire ACM removal activities has yielded approximately 14,310 linear feet of overhead material and 2,420 square feet of surface material removed from approximately 21 buildings. A total of eight, 30-cubic yard roll-off boxes have been transported off site to Allied Waste for disposal.

Once ERRS completed ACM removal from Building 914, the crew also cleared debris and sludge from the basement of Building 914 as well as pressure washed all floors. Water in the basement of Building 914 (from pressure washing and rain) was pumped into the central pit of Building 912 for later transport/disposal by Clean Harbors. ERRS continued to remove debris from two PCB transformer areas (located in the southwest corner) of Building 1018. Once all debris has been removed ERRS will pressure wash and degrease the area. Water from these activities will be stored in a trench along the southern wall of Building 1018.

During this reporting period, approximately 15,100 gallons of wastewater (oily rainwater) were hauled off site to Clean Harbors Services, Inc. treatment facility in Chicago, IL. Loads were transported on August 24 and 30, 2006. To date, a total of 374,459 gallons of wastewater has been transported off site for disposal/treatment. On August 23, 2006, ERRS discovered a manhole south of Building 920 full of liquid/sludge material with a layer of oil on the surface. START sampled the manhole for PCBs and the analytical results reported a reading of 88 mg/kg. An oil and water separator was brought on site to handle the dewatering of the sludgy material.

Air Sampling and Monitoring:

At the request of the OSC, START continued to collect asbestos air samples from the breathing zone of ERRS laborers and the perimeter of the work area from August 21-25, 2006. 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. 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.

On August 28, 2006 due to the temporary suspension of ACM removal activities, air sampling and monitoring was also temporarily suspended. During this reporting period, ERRS completed ACM removal in Building 914. The entire building was considered the exclusion zone; therefore all perimeter pumps were setup outside the building. During this removal, on perimeter pump on August 22, 2006 was reported overloaded with dust. The remaining air samples collected (not reported overloaded) during the reporting period indicated that levels of asbestos in air (inside and outside the work zone) were below permissible exposure levels. A total of 409 air samples (370 Asbestos and 39 Lead) were collected and analyzed from January 27, 2006-August 28, 2006.

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.

START conducted air monitoring with a MultiRae® five-gas photo-ionization detector (PID) on August 31 and September 1, 2006. Monitoring was done while ERRS crews cleared debris from the basement of Building 914. On September 7, 2006, START conducted air monitoring while collecting wipe samples from a storage tank (used for holding of sludge/solids pumped from pits in Building 920 using oil/water separator). The VOC, CO₂, H₂S, LEL and oxygen level readings for the workers' breathing zones were at or below background levels during both monitoring events.

Liquid Sampling:

On August 23, 2006, ERRS discovered a manhole south of Building 920. The manhole was full of liquid/sludge material with a layer of oil on the surface as well as a strong petroleum odor. START collected a sample from this location (MH002-0920-0823) which was sent to Microbac Laboratories (in Merriville, IN) to be analyzed for PCBs VOCs and SVOCs. The analytical results reported the manhole having a total PCB reading of 88 mg/kg which would characterize the liquid as TSCA. Due to these analytical results from Building 920, START collected three samples (in the center pit of Building 912 (PT-0912-0831), the basement in Building 920 (BM-920-0831) and the wastewater above-ground storage tank (AST) near Building 915 (AST-0915-0831)) on August 31, 2006 to verify that no PCBs exist in these areas. The sludge in the basement of Building 920 was analyzed for PCBs only and the samples from Building 912 pit and the AST were both analyzed for PCBs, VOCs and SVOCs. Analytical results from this sampling event reported a total PCB reading of 19 mg/kg samples taken from Building 920 (basement) and Building 912 (pit). The sample taken from the AST (AST-0915-0831) reported non-detect on all analysis.

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 Merriville, Indiana. The manhole and the UST were also analyzed for SVOCs. Analytical results for these reported a Total PCB reading of 14 mg/L for sample TR001-1018-0818. Sample UST001-1018-0818 had a Toluene reading of 40 mg/kg. All other results were non-detect or below permissible levels.

Wipe Samples:

On September 7, 2006 START took a total of five wipe samples (RFR-ST090706-North Wall, RFR-ST090706-South Wall, RFR-ST090706-East Floor, RFR-ST090706-West Floor and RFR-ST090706-Ceiling) from inside the holding tank used to store wastewater from the oil and water separator. The

analytical results from these samples are pending.

START took a wipe sample (WP001-1018-0818) along the south wall of the trench in Building 1018 on August 18, 2006. The sample was sent to Microbac Laboratories for PCB analysis. The analytical result for this sample reported a total PCB reading of 8.6 ug/area which is below the detection limit of 10 ug/area.

Solid Samples:

No solid samples were collected during this reporting period.

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

- Temporarily suspend ACM removal activities;
- 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 using oil and water separator;
- Continue power washing surfaces, excavation of pits and trenches, and backfilling open pits and trenches with clean fill;
- Suspend collection of 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;
 - Maintaining health and safety protocols; and
 - Taking all proper measures to keep airborne asbestos and lead contamination below OSHA and EPA standards.
- Continue to implement corrective measures of cover remaining manholes, pits and trenches including:

- Backfilling all open pits in Building 924;
- Installation of plywood coverings over pits and manholes that are not immediately backfilled;
- Marking all pits, manholes and holes within work area with additional caution tape and highly-visible spray paint;
- All plywood pit coverings having a 12-inch perimeter overlap;
- Reiterating the use of the buddy system at all times.