United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Friday, January 25, 2008
From: Tom Cook

Subject: Peoples Gas Hough Place Station Site
2500 South Corbett Street, Chicago, IL
Latitude: 41.8469000
Longitude: -87.6503000

POLREP No.:	11	**Site #:**	B5HH
Reporting Period:	11/12/07 - 12/14/07	**D.O. #:**	Not Applicable
Start Date:	6/18/2007	**Response Authority:**	CERCLA
Mob Date:	6/18/2007	**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:	ILN000510190	**Contract #**	EP-S5-06-04
RCRIS ID #:			

Site Description

The Hough Place Station Site (Site) is located at 2500 South Corbett Street, Chicago, Cook County, Illinois, in a mixed residential, commercial, and industrial area. The site is approximately 4.5 acres and is bordered to the north by the South Branch of the Chicago River, to the east by a paper storage and distribution facility, to the south by railroad property, and to the west by vacant property. The vacant property to the west and the Site are currently owned by Crowley's Yacht Yard, which previously operated a sailboat storage, sales, and repair facility at the Site.

The Site is a former manufactured gas plant (MGP) that operated as an MGP facility from approximately 1886 to 1934. The Site was built in 1985 by the Equitable Gas Light and Fuel Company and in 1892 began producing "Pintsch gas," a relatively high quality gas produced by an oil gas process, for the Pintsch Compressing Company. Production of Pintsch gas occurred until about the early 1920s. In 1897 Peoples Gas acquired the facility and dismantled the station in 1934. Portions of the property were subsequently leased to other companies who used the property for storage of building materials and the production of asphalt, concrete, and other paving materials until approximately 1950. In 1953, Chicago Title and Trust Company took possession of the property as trustee. From approximately 1953 and 1978, the J.M. Corbett Company operated an asphalt mixing plant on the property. In 1978, Crowley's Yacht Yard bought the property.

From 2000 to November 2006, several investigations were conducted by Peoples Gas at the Site. These investigations included the excavation of test pits, the installation of shallow monitoring wells, the collection of soil borings, the collection of soil and groundwater samples, a geotechnical investigation, and borings into river sediments. Test pits revealed staining and odors, and black asphalt tar at 2 feet below ground surface (bgs). Benzene, toluene, ethylbenzene, and xylene (BTEX); polynuclear aromatic hydrocarbons (PAH); metals, and cyanide were detected in several surface and subsurface soil samples. BTEX, PAHs, and metals were also detected in groundwater samples collected at the Site. Soil borings indicated tar at levels below the water level in the filled-in boat slip. The river investigation revealed sheens, odors, tar coated/stained material, and traces of tar in some of the sediment borings.

Remediation activities by Peoples Gas began in November 2006 under the Illinois Environmental Protection Agency (IEPA) Site Remediation Program. Peoples Gas is the potentially responsible party (PRP) for the site. People's Gas contracted Burns & McDonnell Engineering Company, Inc. (BMcD) to remediate the Site, along with their subcontractors.

Remediation consists of excavation and disposal of contaminated soils. Excavation depths range from approximately 3 feet to 24 feet bgs. Other site activities conducted by the PRP include daily air monitoring, continuous 24-hour perimeter air monitoring and sampling, confirmation soil sampling, and water treatment, sampling, and discharge.

Prior to the U.S. EPA oversight at the Site, BMcD completed excavation of impacted material in excavation cells CF01 to CF58 (see BMcD map of excavation areas under "documents" on the OSC

website). An Administrative Order on Consent was signed by Peoples Gas in early June 2007 prompting the U.S. Environmental Protection Agency (U.S. EPA) to begin PRP oversight activities at the Site.

On June 12, 2007, a kick-off meeting was held at the 22nd Street Site between U.S. EPA, START, Peoples Gas, and BMcD, to discuss future oversight activities, documents required, and logistics for transmitting data and documents. The meeting addressed three MGP sites that U.S. EPA would be overseeing, all located within one mile of each other: 22nd Street Station, Hough Place, and Pitney Court. Note that one START member is to cover oversight of these three sites and will rotate to a different site each day. Both Hough Place and Pitney Court remediations are expected to be completed by the middle of 2008, while the 22nd Street Station Site remediation is expected to be completed by the end of 2008.

On June 18, 2007, U.S. EPA began PRP oversight activities at the three Peoples Gas MGP sites: Hough Place Station, Pitney Court, and 22nd Street Station. The U.S. EPA Superfund Technical and Response Team (START) contractor is performing PRP oversight during the removal activities at the sites. As part of the removal activities, START collects or observes the collection of soil confirmation samples to confirm that the PRP cleanup objectives are being met. Site contaminants of concern are:

- BTEX;
- PAHs;
- Synthetic precipitation leaching procedure (SPLP) lead, chromium, and selenium.

Cleanup objectives for the Hough Place Station Site are as follows:

1. For the 0 to 3.5 foot depth interval, remove all soil that exceeds IEPA TACO Tier 1 residential standards for soil ingestion and install a 3 foot engineered barrier.
2. For the 0 to 10 foot depth interval, remove all soil that exceeds IEPA TACO Tier 1 residential standards for soil inhalation and where necessary, install a 10 foot engineered barrier.
3. For soil deeper than 10 feet bgs, remove all soil that exceeds IEPA TACO Tier 1 and Tier 3 residential standards for soil ingestion, and use the 10 foot overburden as an engineered barrier, if necessary, to prevent exposure via inhalation.
4. Invoke a construction worker notice and the City of Chicago Ordinance prohibiting installation of potable wells on the Site to eliminate the construction worker and groundwater exposure pathways.

In August 2007, Metropolitan Water Reclamation District of Greater Chicago (MWRD) finalized the discharge permit that authorizes treatment and discharge of treated Site water to an onsite MWRD sanitary sewer. START collects or observes the collection of treatment water samples to confirm that the MWRD objectives are being met. Samples are being collected to identify the potential presence of the following site contaminants of concern:

- Target Compound List (TCL) VOC;
- PAH; and
- Target Analyte List (TAL) Metals.

Treated water objectives for the Site are established by MWRD in the discharge permit issued for the site.

Current Activities

During the reporting period, the PRP excavated cells 090, 091, 092, 093 and 094. The PRP conducted confirmation sampling of excavation cells 092 and 093. The PRP subcontractor North Star, a sheet pile wall installation contractor, mobilized a trailer and heavy equipment to the site to install cofferdams along the site boundaries. The PRP contractor mobilized a winterized water treatment system to the site.

A summary of the remediation activities performed during the reporting period are as follows:

- Transported 441 loads to CID Landfill in Calumet City, Illinois; trucks decontaminated prior to leaving site.
- Performed perimeter air sampling and air monitoring on a continuous basis (24-hour air samples and air monitoring is conducted around the perimeter). On November 14, 2007, elevated benzene in air levels were detected: benzene control measures were taken. On November 15, 2007, elevated dust levels were detected: dust control measures were taken. On November 29 and December 3, 2007, elevated dust and benzene in air levels were detected: re-sample was below action levels. On December 5, 7 and 10, 2007, elevated dust levels were detected: re-sample was below action levels.
- Performed health and safety air monitoring during site activities.
- Performed street sweeping activities in front of the Site and along Senour Street.

- Performed daily de-watering activities in excavation areas. Performed water treatment and discharged 359,150 gallons of treated water to the MWRD system in November. No water treatment or discharge was performed in December. Shipped 72 loads of untreated water offsite for disposal at CID or Ortek.
- Performed dust suppression activities on-site and along Senour Street with use of a water truck.
- Collected confirmation soil samples from excavation cells 092 floor and south wall, and 093 floor. Collected the November 2007 MWRD monthly confirmation sample of treated discharge water.
- Backfilled completed excavation cells.

On November 26, 2007, START personnel collected a treatment water sample from the discharge hose of the water treatment system, along with BMcD. The START sample was submitted for TCL VOCs, PAHs and TAL metals. The BMcD sample was submitted for SDA-002 parameters specified by MWRD. The START and BMcD sample results met the MWRD criteria.

On December 7, 2007, START personnel collected one soil sample from the south wall of excavation cell 092, along with BMcD. START personnel observed as BMcD collected one soil sample from the floor of cell 092. The samples were analyzed for BTEX and PAHs. The soil sample results met the PRP cleanup levels as stated in the Remedial Action Plan (RAP).

On December 12, 2007, BMcD collected one soil sample from the floor of excavation cell 093. The samples were analyzed for BTEX and PAHs. The soil sample results met the PRP cleanup levels as stated in the RAP.

Analytical results from previous sampling events have been received and evaluated by START:

On October 24 - 26, 2007, BMcD collected four confirmation samples for soil borings drilled within Hough Slip. The samples were analyzed for a "fingerprint" to identify the nature of any source material. According to the laboratory interpretation, contamination in the samples was likely derived from coal tar, creosote, petroleum, and carbureted water gas. The laboratory report indicated contamination was consistent with impacts from former manufactured gas plants.

On October 29, 2007, BMcD collected a treatment water sample from the discharge hose of the water treatment system, and submitted it for SDA-002 parameters specified by MWRD. The water sample results met the MWRD criteria.

Planned Removal Actions

Planned removal actions at the Hough Place Station Site are as follows:

- Excavate soil per the RAP
- Transport excavated soil to CID Landfill for disposal
- De-water excavation areas
- Treat and dispose water onsite to the MWRD system, or dispose offsite to CID or Ortek
- Backfill completed excavation areas

Next Steps

The next steps to be carried out by the PRP are as follows:

- Complete excavation of cells 090 and 091; including disposal of soil
- Begin excavation of cell CF92
- Continue to de-water excavation areas as required
- Treat water and discharge to MWRD system or dispose offsite
- Continue dust suppression activities with water truck
- Continue 24-hour perimeter air monitoring and sampling
- Continue air monitoring in work zones
- Continue street sweeping activities
- Continue to decontaminate trucks prior to trucks leaving site
- Collect confirmation samples of cells 090-091, when completed
- Backfill completed excavation cells with clean fill when confirmation results are received

Key Issues

None.