

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 #3
Progress
Pilsen Soil OU1 Railroad Spur and Alley Site
C5N8 OU1
Chicago, IL
Latitude: 41.8535941 Longitude: -87.6610085

To: Richard Karl, U.S. EPA
Lindy Nelson, DOI
Lauder Roger, IL. EPA
Bruce Everetts, IL. EPA
Dave Graham, Chicago Dept. of Health
Terry Sheahan, Chicago Dept. of Health
Vicente Sanchez, Alderman Solis (Chief of Staff)
Mark Johnson, ATSDR
Samuel Borries, U.S. EPA
Jason El-zein, U.S. EPA
Anne Rowan, U.S. EPA
Brian Schlieger, U.S. EPA HQ
Kimberly Worthington, Chicago Dept. of Health

From: Ramon Mendoza, On-Scene Coordinator

Date: 12/4/2015

Reporting Period: 11/30/2015 to 12/4/2015

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 [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

Responsible Parties initiated the cleanup at the Site 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 11/30 to 12/4/2015. EPA, START, and H. Kramer contractors [GHD (prime), RW Collins (soil excavation), & Hygieneering (H&S, Monday only)] are onsite. Response actions from 11/16 to 11/25 are documented in the previous POLREPS #1 and #2.

The overall goals for the week was to: 1) remove vegetation, garbage and other solid waste from Areas 1 and 2 ; 2) Excavate Area 1 to appropriate depth to meet cleanup levels; 3) Conduct additional treatment of soil as needed. These goals were achieved as described in the following day to day work:

Monday 11/30 to Tuesday 12/1:

- RW Collins conducted and completed solid waste (garbage, and vegetation) removal activities in western portion of Area 1. The waste was stockpiled in the vacant lot north of western Area 1. There is a large amount of garbage from this area which was used as an encampment for homeless in the area. In addition, there were three large abandoned power poles, and rail ties mixed into the solid waste.

Wednesday 12/2 :

- Chicago Streets and Sanitation arrived on-site to assist in the removal of garbage and vegetation in Areas 1 (eastern portion) and 2. In addition, they transported all of the solid waste off-site to the Shred-all solid waste transfer station (43rd and Racine) in Chicago. EPA OSC had previously called the Alderman's Office for assistance to help dispose of the large amounts of garbage in Areas 1 and 2.
- GHD's TLCP lead results came back and the results were below the TCLP criteria for lead in Area 4 and the eastern portion of Area 8. However, TCLP lead results for the Area 8 were still above the Haz criteria and so H. Kramer contractor RW Collins conducted additional treatment in the western 50' of soil in Area 8. After treatment samples were collected (EPA collected split samples) for lab analysis.
- RW Collins begins soil excavation of western portion of Area 1. The excavation started on the west end. The first 50 feet on the west end was already at the lead cleanup level (below 800mg.kg) and 3 inches (bgs) of soil was removed in this area to make room for the

gravel cover. There after excavation was conducted to 6 inches bgs as described in the work plan.

- To confirm that the cleanup goal is being met, EPA OSC and START began collecting and screening soil samples with the XRF as RW Collins progressed with the excavation in western portion of Area 1.

Thursday, 12/3:

- Excavation of the western portion of Area 1 at 6 inch bgs continued. EPA OSC and START collected surface soil samples at about 40-50 foot horizontal intervals and evaluated using the XRF to confirm that cleanup levels are being met. Excavated soil was stockpiled over plastic sheets in the open parking area north of Area 1. EPA soil samples were sent to the START lab for analyses (total lead).

Friday, 12/4

- Excavation in the western portion Area 1 was completed. The final 54 feet was excavated down to 2 feet because the XRF lead concentration results were consistently above 1500 mg/kg. EPA and GHD determined this was a low drainage point in the area and it was decided to excavated down to the 2 feet bgs to meet the goals specified in the EPA Action memo.

- GHD and RW Collins initiated grading work in Area 2 and Eastern portion of Area 1 to prepare the ground for the gravel/asphalt cover.

- 17 truck loads of gravel arrived and were staged at the parking lot north of Area 1 for use in grading and cover in (366.6 tons) Area 1 and Area 2.

- Soil piles in the vacant parking lot and in Area 4 were covered and secured for the weekend.

-The EPA TCLP lead results for the 2 split samples from the Area 4 piles were 0.23 mg/L and 0.8 mg/l. The TCLP lead results for the 2 split samples from Area 8 were 0.029 mg/L and 2.4 mg/L.

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 had an additional monitoring location upwind with a DustTrak. EPA conducted additional air monitoring with a PDR for dust in air the PDR held by START personnel collected dust data for continuous monitoring near work areas.

The average PDR reading for the week is 0.0157 mg/m³ and average DataRAM 4 reading for the week is 0.0313 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(> TCLP Lead)		105 cubic yards excavated and treated			Soil excavated and treated on-site (estimate)
-----		-----			-----
Garbage and vegetation		38.8 tons			Shred-AI solid waste transfer station (Chicago)

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 12/7 to 12/11:

H.Kramer contractors will be working in Area 1 and 2 to grade the ground prepare the ground for the gravel and asphalt cover. Pending results of the EPA confirmatory soil samples (which are anticipated to meet the cleanup level,) the final cover for the western portion of Area 1 will be installed consisting of a geotextile layer with gravel on top.

Treated soil piles in Areas 4 and 8 are being schedule for disposal pending results of TCLP analysis for lead.

2.2.1.2 Next Steps

In addition to the planned and anticipated activities, OSC will continue to work with EPA community 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 help ensure safety of all people at the Site. Weather conditions are approaching winter conditions. Appropriate measures are being taken to ensure health and safety.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	\$50,000.00	\$36,064.00	\$13,936.00	27.87%
Intramural Costs				
Total Site Costs	\$50,000.00	\$36,064.00	\$13,936.00	27.87%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Ramon Mendoza, EPA OSC,

Andy Krein, 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	Chicago Streets and Sanitation	DF Rail Group	EPA	GHD	Hygieneering	RW Collins	START	W-T Land Surveying Inc.
11/30/15	--	--	--	1	3	1	4	1	--
12/01/15	--	--	--	1	1	--	4	1	--
12/02/15	--	6	--	1	1	--	5	1	--
12/03/15	--	--	--	1	2	--	5	1	2
12/04/15	--	--	--	1	1	--	5	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.



