

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial
Pilsen Soil OU1 Railroad Spur and Alley Site
C5N8 OU1
Chicago, IL
Latitude: 41.8535941 Longitude: -87.6610085

To: Richard Karl, U.S. EPA
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Terry Sheahan, Chicago Dept. of Health
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Kimberly Worthington, Chicago Dept. of Health

From: Ramon Mendoza, On-Scene Coordinator

Date: 11/20/2015

Reporting Period: 11/16 to 11/19/2015

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 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 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

(Response actions from 11/16 to 11/20/2015.)

BNSF (Railroad PRP) and its contractors mobilized to the site and completed removal of about 1150 feet of rail and about 575 wooden railroad ties in Site Areas: 1,2,4,5,6,8,&10 (see photo attached to POLREP). The railroad ties were transported off-site to a BNSF staging area (near the Site) for disposition (at an energy recovery facility) at later date. The rails were staged in a gated empty lot next to the Site (after getting owner permission) for recycling at a later date. At all phases of the cleanup water was discharged on to the ground in the work areas to ensure dust control. In addition, sidewalks were also cleaned to make sure that dirt tracked in and out by vehicles was removed (swept back to the Site). (Work to remove the rails and ties was completed on 11/19/2015).

GHD (H.Kramer and & Co. contractors) coordinated the cleanup crews onsite and conducted particulate monitoring (upwind and downwind). BNSF conducted its own worker personal protection air monitoring (under OSHA). The personal protection air monitoring results were below the criteria to the extent that the workers were able to go to a PPE modified level D on 11/17 after being in Level C on 11/16.

EPA OSC and START contractors observed the cleanup to ensure compliance with the work plan and conducted air monitoring in coordination with GHD.

GHD and EPA conduct air monitoring using DataRAM 4 and DustTraks for dust in air. EPA utilized a Gillian to monitor START personnel exposure, sampling for arsenic, cadmium, chromium, and lead particulates in air.

EPA START reported that the average DataRAM 4 downwind dust particulate reading for this week was 0.0140 mg/m³. The average pDR dust particulate reading for this week was 0.0094 mg/m³. (The action levels 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. **No action levels (for dust) were exceeded.**

EPA OSC and GHD met with the principal (Benito Juarez Academy, High School adjacent to Areas 1 and 2) to coordinate work schedule and addressed all health and safety concerns from the high school.

Controls such as maintaining safe distance and air monitoring carried out by EPA START and OSC (plus BNSF and GHD personnel) were in place to ensure protection of students and teachers.

EPA OSC met with representatives of the Community Group PERRO on 11/16 in the morning. They were concerned about the dust issues and the OSC briefed them on the work and dust controls in place.

EPA OSC coordinating with the Alderman's (Solis) Office to help address homeless trespassers at the Site and an abandoned van and dumpster (blocking work in Area 8). The Van was removed by the City on 11/20/2015.

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			to be recycled.

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 11/23 to 11/25:

GHD contractors will arrive on 11/23 to set up and initiate soil stabilization of soils contaminated with lead above the TCLP in Area 4. Stabilization of Areas 5 and 8 the rest of the week will follow.

Areas 4, 5, and 8 had the highest levels of total lead contamination and exceed the TCLP lead criteria. These soils will be treated (stabilization) in-situ then will be excavated and shipped off-site for disposal.

No work is planned for the rest of the week, November 26-27.

2.2.1.2 Next Steps

In addition to the planned and anticipated activities, OSC will continue to work with EPA community relations 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 ensure safety of all people at the Site. In addition, crews have found medical waste (needles) and biological waste in addition to the garbage in Areas 1 and 2. EPA and GHD are amending the Health and Safety Plan in the field to ensure worker protection.

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	\$28,450.00	\$21,550.00	43.10%
Intramural Costs				
Total Site Costs	\$50,000.00	\$28,450.00	\$21,550.00	43.10%

* 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

Matt Lazaric, GHD

Daniel Roberts, BNSF contractor

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

Date	BNSF	DF Rail Group (BNSF contractor)	EPA (OSC)	GHD (H.Kramer contractor)	Hygieneering BNSF contractor)	RW Collins (GHD contractor)	START
11/16/15	--	4	1	2	1	2	1
11/17/15	1	4	1	1	1	--	1
11/18/15	1	4	1	1	1	--	1
11/19/15	1	4	1	2	1	--	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.