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 #5**
Progress
Pilsen Soil OU1 Railroad Spur and Alley Site
C5N8 OU1
Chicago, IL
Latitude: 41.8535941 Longitude: -87.6610085

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From: Ramon Mendoza, On-Scene Coordinator
Date: 12/31/2015
Reporting Period: 12/14 to 12/30/2015

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 [ft^2] 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 ft^2 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, 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.

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 12/14 to 12/30/2015. EPA OSC, START, and H. Kramer contractors [GHD (prime), RW Collins (subcontractor/soil excavation) are onsite. Response actions from 11/16 to 12/11/2015 are documented in the previous POLREPS #1,2,3, and 4.

The overall goals for the period were to: a) Complete the treatment, excavation, and disposal of the treated lead contaminated soil in Area 4 and 8; b) Complete gravel subgrade activities in Areas 4, 6, 7, and 8; These goals were largely achieved as described in the following work.

Areas 4 and 8 contained soil where TCLP lead (greater than 5 mg/l) were exceeded. A total of about 31.8 cubic yards of soil were excavated and successfully treated in Area 4. A total of about 73.2 cubic yards of soil were excavated and successfully treated in Area 8. These soils were treated with Free Flow Heavy Metals Treatment Regent which is a phosphate based material and is mixed at a 4% application rate to soil for TCLP lead treatment. The lab results for TCLP lead after treatment in Area 4 was 1.5 and 2.9 mg/L. Area 8 TCLP lead results after treatment was <.05mg/l (east pile) and 4.7 mg/L (west Pile). The results are all below below the 5 mg/L toxicity characteristic requirement and qualifies these soils for disposal as a solid waste. EPA split samples results for TCLP were comparable.

About 152 cubic yards of soil was excavated in Area 1 West (area north of the soccer field) to meet the cleanup goal. In addition, soil was excavated to meet the proper subgrade in Areas 2, 6, 7, 8, and Area 1 East. Overall about 600.1 cubic yards of lead contaminated soil was excavated and disposed of as solid waste (See Section 2.1.4 Progress Metrics). In addition to the aforementioned TLCP Lead treated soils (Areas 4 and 8), these soil soils were transported and disposed offsite at the Laraway RDF in Joliet, IL (IL ID 1970450002.). This landfill is currently acceptable to receive waste regulated by the CERCLA Off-site rule.

Subgrade preparations using gravel and some soil was completed in Areas 4, 6, 7, and most of 8. Typical subgrade preparations of soil excavation ranged from 6-9" below ground surface. As in all other areas, an orange geotextile cover was installed at the bottom of the excavations. Snow, ice, and standing water prevented completion of subgrade work in Area 8 and Area 5.

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 (except for days with rain or snow). GHD had an additional monitoring location upwind with a DustTrak.

The average DataRAM 4 reading for the period was about 0.0291 mg/$m^{3.}$ **No action levels (for dust) were exceeded.**

Note: The action levels EPA START developed for the site are 0.812 mg/m^3 for Areas 8 and 9, 1.19 mg/m^3 for Areas 4, 5, 6, 7, and 10, and 3.19 mg/m^3 for Areas 1 and 2.) GHD has a single action level of 0.480 mg/m^3. The off-site dust particulate action level is any sustained downwind reading of 0.150 mg/m^3 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

Pilsen Soil Ou1 Area Name	**Lead Contaminated Soil Excavated and Disposed**	**Disposal Facility**	**Comment**
Area 1	175.3 cubic yards	Laraway RDF, Waste Management (Joliet, IL)	Excavated for grading and to meet cleanup goal.
Area 2	60.4 cubic yards	Laraway RDF, Waste Management (Joliet, IL)	Excavated for grading
Area 4 (Treated for TCLP Lead)	31.8 cubic yards	Laraway RDF, Waste Management (Joliet, IL)	
Area 8 (Treated for TCLP Lead)	73.2 cubic yards	Laraway RDF, Waste Management (Joliet, IL)	
Area 8	97.4 cubic yards	Laraway RDF, Waste Management (Joliet, IL)	Excavated for grading
Area 6 & 7	162 cubic yards	Laraway RDF, Waste Management (Joliet, IL)	Excavated for grading
Total	**600.1 cubic yards**		

Waste Stream	***Medium***	***Quantity***	***Manifest #***	***Treatment***	***Disposal***
Railroad ties (wood)		575 feet			disposal thru energy recovery, Staged BNSF Yard (Chicago)
Rails (steel)		1150 feet			recycled.

Solid waste (Garbage and Vegetation)		38.8 tons			---------- Shred-Al solid waste transfer station (Chicago)

2.2 Planning Section

2.2.1 Anticipated Activities

All Site work remaining requires working in warm non-winter conditions and all Site work has been completed for the winter. Response activities will resume again in April 2016 and will consist of repairs of the gravel subgrade, final subgrade construction, and asphalt capping work.

2.2.1.1 Planned Response Activities

- Maintain fencing and signage at the Site.

- Conduct monthly monitoring inspections to ensure no major damage to Site.

- Remove remaining wood rail ties in Area 2.

- Conduct inspection to determine scope of repair work.

- Complete subgrade work in Area 5 and Area 8.

- Install asphalt cover in Area 1 (east), Areas 2, 4, 5, 6, 7, 8, 9, and 10.

-Coordinate with the City on all relevant issues.

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

Weather conditions have halted work at the Site temporarily. Work to complete the job will start again in April 2016 (when the asphalt plants reopen).

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

Note: A request to increas the START contractor support by $25000 is in the process of being approved at this time.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	$50,000.00	$49,145.00	$855.00	1.71%
Intramural Costs				
Total Site Costs	$50,000.00	$49,145.00	$855.00	1.71%

* 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.**
12/14 to 30 /15	--	--	--	1	2	--	3 to 4	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.


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