

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Pillsbury Mills - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #2  
Progress  
Pillsbury Mills  
C5BW  
Springfield, IL  
Latitude: 39.8113590 Longitude: -89.6321720

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**From:** Kevin Turner, OSC

**Date:** 3/28/2017

**Reporting Period:** 2/27/2017 – 3/24/2017

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C5BW	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	10/20/2016
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	2/6/2017	<b>Start Date:</b>	2/6/2017
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	ILD005172622	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Time critical removal and disposal action of friable asbestos contaminated debris (ACM) from prior improper abatement and building demolition actions taken by others. The Site is contaminated by asbestos resulting from demolition of Site buildings containing asbestos and the scrapping of metal pipes.

#### 1.1.2 Site Description

The Site is a former grain/flour processing plant with an 18.82 acre triangular parcel (20.90 acres including right-of-way). Most of the original surface coverage consisted of the grain elevators, the front office, and the facility's main industrial complex, including the mill buildings, the manufacturing areas, the warehouses, and the railroad spurs which previously delivered un-milled grain and finished flour products.

The remaining buildings are predominately contiguous throughout the first and second floors and have multiple, inter-connecting basements joined on the south and north by the grain and flour bins. There exists about 850,000 square feet of processing and warehouse space in the complex. The Site was first developed in 1929. Throughout the 1930s, additional buildings and other additions led to the current Site footprint. Portions of warehouse #9, warehouse #7, bakery mix building and the boiler room have been demolished. Most of the main buildings remain standing and include various pieces of equipment, elevators, and internal debris. Boilers, pipe runs and associate asbestos wrap is found throughout the remaining structures.

As noted above, the results of the scrapping and demolition activities have left a large amount of loose and friable asbestos all through the buildings and asbestos containing rubble and debris outside of the buildings which is exposed to the elements.

##### 1.1.2.1 Location

The Site is located on 1525 East Phillips Street at the intersection of East Phillips and North 15th Streets in Springfield, Sangamon County, Illinois, 62702. Residential properties are located immediately across the street from the facility on the north and east perimeters. Site coordinates are Latitude 39 48' 43.21" North and Longitude -89 38' 01.50" West. The Site is located in a mixed use area, including industrial, commercial, and residential areas. To the south and west are residential areas and to the east is railroad property. The Site is fenced along the west and south sides, and bounded by Illinois & Midland (I&M)/Tazewell & Peoria (T&P) Railroad spurs along the east. The capital building of the State of Illinois is

approximately one mile to the southwest. Interstate Highway 55 is approximately 1.5 miles east of the Site. Over 11,000 people live within one mile of the Site. The nearest residences are located approximately 100 feet from the main entrance and the asbestos-containing debris piles near the former plant buildings.

### 1.1.2.2 Description of Threat

Asbestos is the principal contaminant of concern, which makes this proposed removal action a nationally significant and precedent setting removal. Also, small quantities of paint containers, totes of unknown chemicals, suspected fuel oils and containers of gasoline products, antifreeze, PCB lighting ballasts, mercury switches and other common household hazardous wastes have been observed. The OSC documented the presence of friable asbestos, ACM, and regulated asbestos containing material (RACM) at the Site during a Site visit on May 17, 2016.

### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On several occasions in August and September 2015, the Illinois EPA (IEPA) conducted inspections of the Site and collected samples of ACM-impacted building materials. Most notably these samples came from debris piles strewn about inside and outside the buildings (warehouse #6) and from pipe insulation found on the floor in the buildings (warehouse #4, Grocery Mix building and warehouse #6). The IEPA lab sample results concluded that ACM is present inside and outside the buildings and co-mingled with debris piles.

The August 2015 collected samples showed 15 of 17 bulk sample locations contained 2%-70% chrysotile and 5%-40% amosite asbestos, including friable asbestos. A September 2015 sample result showed that asbestos was outside the buildings on the ground near the main entrance to the facility (Grocery Mix building).

On June 2, 2016, EPA and IEPA met on-site for a Site evaluation and to review the asbestos analytical data. All samples were analyzed using Polarized Light Microscopy (PLM) and were considered positive for asbestos if the sample had asbestos greater than 1 percent weight by volume. During the EPA removal site evaluation, the property showed evidence of trespassing in the form of graffiti and apparent illegal scrapping. Asbestos debris was observed on the surface of the Site, with limited restricted access.

In August 2016, IEPA took additional asbestos samples demonstrating that Transite found outside warehouse #7 and the Bakery Mix building (near the fence) had been released to the environment.

EPA conducted assessment categorization of suspected ACM at the Site in accordance with the NESHAPS at 40 CFR, Parts 61.141 and 61.145. The ACM data was classified under one of the three categories summarized as follows:

- Category I Non-Friable ACM is defined as ACM packing, gaskets, resilient floor covering, and asphalt roofing products containing more than 1-percent asbestos. Generally, Category I building materials would not create an airborne release of asbestos fibers during normal demolition activities. However, the debris at the Site is the result of improper demolition, thereby creating Regulated ACM (see below).
- Category II Non-Friable ACM is defined as any material, excluding Category I non-friable ACM, containing more than 1-percent asbestos that, when dry, cannot be crumbled, pulverized, or reduced to a powder by hand pressure. An example of this ACM is asbestos cement board. Generally, Category II building materials would create an airborne release of asbestos fibers during normal demolition activities.
- Regulated ACM (RACM) is defined as (1) friable ACM; (2) Category I Non-Friable ACM that has become friable; (3) Category I Non-Friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading; or (4) Category II Non-Friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by forces expected to act on the material in the course of demolition or renovation operations regulated under Subpart 61.141 of 40 CFR, Part 61 (NESHAP Revision; Final Rule).

In addition to the Illinois EPA asbestos data, past owners and operators of the Site had conducted asbestos surveys. Prior owners documented that asbestos was found throughout the facility. For example, a December 1996 report produced by Cargill documented friable asbestos containing material, including pipe insulation, fitting insulation, tank insulation, and dryer insulation. The report identified areas where friable asbestos was found and quantified the amount: i.e. C. Mill — 1st floor, pipe insulation — 1,200 linear feet; 2nd floor, pipe insulation — 350 linear feet; 8180 Building — 3rd floor, pipe insulation — 3,500 linear feet; 5th floor, pipe insulation — 550 linear feet, etc. The data provided in this report showed that chrysotile ranged from 5%-15% and amosite ranged from 10% - 20%. In a May 2008 report, Ley Properties, LLC (the then-owner of the Site), in an effort to scrap valuable electrical equipment documented that asbestos was found in basement electrical vaults under warehouse #7. Their results showed Chrysotile ranged between 30% - 50%.

The documents referenced above confirm that large amounts of asbestos has been historically found at the Site, some in damaged condition. Due to uncontrolled scrapping and demolition activities at the Site, EPA cannot correlate these reports to current Site conditions. However, the current conditions demonstrate that the asbestos were released to the environment.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

The removal action will mitigate the threats from asbestos by locating, sampling, and arranging for disposal of asbestos and asbestos debris left at the Site. The uncontrolled conditions of the hazardous substances at the Site require that this action be classified as a time-critical removal action. Please note that the overall project duration will be driven by the vast size of the former facility. Additionally, some of the building basement hold water and because of such have not yet been assessed.

#### 2.1.2 Response Actions to Date

The OSC has tasked the ERRS (ER, LLC) and START (Tetra Tech) contractors to perform the following actions:

- Develop and implement a Removal Action Work Plan (RAWP);
- Develop and implement an Emergency Contingency Plan (ECP);
- Develop and implement a Site Health & Safety Plan (HASP) consistent with the work to be performed, but not limited to an air monitoring plan that address asbestos removal and friable asbestos containing materials (ACM) during the removal of asbestos, scrap steel and other PACM demolition debris on the site;
- Develop and implement an Air Monitoring Plan (AMP);
- As related to the AMP, START has developed and implemented a real-time dust particulate monitoring system using the Emergency Response Team VIPER System;
- On February 6, 2017, the ERRS contractor arranged for electrical and water service be provided to support project needs inside the temporary field office and decontamination station. That same day a fire hose was used to clean an existing concrete parking area on the south side of the site for a Command Post;
- The ERRS contractor routinely use fire hoses connected to a metered fire hydrant for routine wetting and misting of ACM impacted materials and PACM construction debris;
- The contractors placed clean rock next to the loading pad to facilitate ingress/egress of trucks that haul ACM and PACM demolition debris;
- On February 15, 2017, the ERRS contractor initiated the loading, transportation and disposal of PACM demolition debris materials;
- On February 21, 2017, the ERRS contractor initiated the repackaging of bagged asbestos pipe insulation materials that was illegally removed by others;
- On March 10, 2017, the ERRS contractor completed the loading, transportation and disposal of PACM demolition debris;
- The asbestos removal work was temporarily shut-down during the entire week of March 13, 2017, for OSC training in Angola, Indiana;
- EPA, START and ERRS contractors returned to work on March 20, 2017. Due to an increase in the number of asbestos removal workers, a larger crew shower trailer and diesel powered generator was delivered that same week;
- On March 21, 2017, ERRS assembled and affixed a debris chute onto the 4<sup>th</sup> floor of the Bakery Mix Building;
- On March 22, 2017, ERRS initiated asbestos glove-bag removal on the 8<sup>th</sup> floor of the Bakery Mix Building;
- On March 23, 2017, ERRS completed the pre-cleaning along with the completion of the negative-air containment system on the 4<sup>th</sup> floor of Bakery Mix Building;
- On March 23, 2017, ERRS initiated asbestos removal work on the 7<sup>th</sup> and 4<sup>th</sup> floor of the Bakery Mix Building. The 7<sup>th</sup> floor was completed on March 24, 2017;
- On March 24, 2017, ERRS completed glove-bag asbestos removal work on the 8<sup>th</sup> floor of the Bakery Mix Building.

### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Enforcement actions are pending at this time.

### 2.1.4 Progress Metrics

As part of the start-up to clean-up activities on this site, the USEPA and its contractors mobilized to the site on February 6, 2017 and initiated site preparations to clean up an existing concrete parking lot and prepare it for use as a command post which includes field office, breakroom and decontamination station. In addition the following waste streams disposal planning or materials have been shipped to date :

Waste Name	# of Loads	Quantity	Treatment	Location
ACM/PACM/RACM Impacted Debris	100	2195.90 tons	Land Disposal	Waste Management, Inc., Five Oaks Landfill Taylorville, IL
		tons	Land Disposal	Republic Services, Landfill, IL
<b>Drummed Wastes</b>	<b># of Loads</b>	<b>Quantity</b>	<b>Treatment</b>	<b>Location</b>
Waste Oils				
<b>Compressed Gas Cylinders - Wastes</b>	<b># of Loads</b>	<b>Quantity</b>	<b>Treatment</b>	<b>Location</b>
Oxygen				
Acetylene				
<b>Universal Wastes</b>	<b># of Loads</b>	<b>Quantity</b>	<b>Treatment</b>	<b>Location</b>
Fluorescent light bulbs				
PCB light ballast				
Spray paint cans				
Elemental mercury switches/thermometers				

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

Ongoing site operations will remove and transport PACM demolition debris scattered across the site; abate ACM found in buildings; remove and dispose of all unknown drummed materials along with many other universal waste streams.

#### 2.2.1.1 Planned Response Activities

During the implementation of the removal action, waste materials will be segregated and removed into the following categories:

- Friable asbestos-containing construction debris
- Friable asbestos-containing pipe wrap and boiler insulation materials
- Unknown drums
- Compressed Gas Cylinders
- Universal wastes
- Non-asbestos impacted scrap metal

The majority of the wastes will be directly loaded into lined trucks or dumpsters/roll-off containers. Any debris that is too large for transport will be mechanically demolished prior to load out and transport. Depending on the location of removal activities, some wastes (i.e., drummed and universal waste streams) may be temporarily stockpiled inside an outbuilding prior to transport and disposal.

#### 2.2.1.2 Next Steps

Continued site operations will load, transport and dispose PACM demolition debris found in many areas at the site along with the removal of hazardous and non-hazardous waste and miscellaneous debris materials.

### 2.2.2 Issues

None at this time. However, inclement weather may create weather delays to the project schedule.

## 2.3 Logistics Section

Not applicable (NA)

## 2.4 Finance Section

### 2.4.1 Narrative

A TDD for \$35,000 was issued to Tetra Tech Inc., on 1/10/2017. TDD Amendment #1 for \$35,000 was approved by the OSC on 2/17/2017. The START project budget is: \$70,000.00.

START costs to date are \$51,744.00.

A Task Order (TO) for \$300,000 was issued to Environmental Restoration, LLC, on January 11, 2017.

A TO Amendment for \$100,000 was issued on January 31, 2017.

A TO amendment for \$300,000 was issued on February 27, 2017

ER, LLC cost to date are \$439,909.

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$700,000.00	\$439,909.00	\$260,091.00	37.16%
TAT/START	\$70,000.00	\$51,744.00	\$18,256.00	26.08%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$770,000.00</b>	<b>\$491,653.00</b>	<b>\$278,347.00</b>	<b>36.15%</b>

\* 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

All field work conducted at the site is under an approved Health and Safety Plan (HASP).

### 2.5.2 Liaison Officer

NA

**2.5.3 Information Officer**

NA

**3. Participating Entities**

**3.1 Unified Command**

NA

**3.2 Cooperating Agencies**

Illinois EPA

**4. Personnel On Site**

USEPA	1
ER, LLC	14
START	1
Illinois EPA	1

**5. Definition of Terms**

ACM(s)	Asbestos Containing Materials
AMP	Air Monitoring Plan
BTEX	Benzene, toluene, ethyl benzene, xylenes
ECP	Emergency Contingency Plan
EPA	Environmental Protection Agency
ER, LLC	Environmental Restoration, LLC
ERRS	Emergency and Rapid Response Services
FPN	Federal Project Number
HASP	Health and Safety Plan
IEPA	Illinois Environmental Protection Agency
NA	Not Applicable
NESHAPS	National Emission Standards for Hazardous Air Pollution (asbestos)
OSC	On-Scene Coordinator
PACM	Presumed Asbestos Containing Materials
PLM	Polarized Light Microscopy
PRP	Potentially Responsible Party
RP	Respondents
RACM	Regulated Asbestos Contaminated Materials
RAWP	Removal Action Work Plan
SITREP	Situation Report
START	Superfund Technical Assessment and Response Team (Tetra Tech)
TDD	Technical Directive Document
TO	Task Order
UST	Underground Storage Tank
USEPA	United States Environmental Protection Agency

**6. Additional sources of information**

No information available at this time.

**7. Situational Reference Materials**

No information available at this time.