

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Sangamon Street Right of Way - Removal Polrep  
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #2  
Final  
Sangamon Street Right of Way  
C54R  
Chicago, IL

**To:** Sam Borries, U.S. EPA  
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**Date:** 8/26/2016

**Reporting Period:** 7/13/2016-11/11/2016

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C54R	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	9/8/2015
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	6/20/2016	<b>Start Date:</b>	6/20/2016
<b>Demob Date:</b>	8/5/2016	<b>Completion Date:</b>	11/11/2016
<b>CERCLIS ID:</b>	ILN000505581	<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 Action

#### 1.1.2 Site Description

As part of the investigation phase of the Lowenthal removal project, EPA requested access to the BNSF Right of Way which borders the Lowenthal Site on the east boundary, to delineate the extent of contamination. It was agreed that on behalf of the EPA, the BNSF contractor would collect the necessary soil samples at the designated EPA sampling locations and split samples. These samples were collected on June 21, 2013. In addition to the EPA sampling activities, TRC collected three additional soil samples on June 21, 2013, one block north of the EPA sampling locations (north of Cullerton Street) along the BNSF ROW and east of Sangamon Street. The City of Chicago also owns and maintains a side walk and portions of the Sangamon right of way.

U.S. EPA signed an action memorandum documenting the site conditions on September 8, 2015 and began negotiations to sign a consent order with BNSF railroad to complete the removal action. The consent order with BNSF was signed on March 16, 2016. The removal action work plan which was prepared by BNSF's contractor and all accompanying plans were attached to the consent order.

##### 1.1.2.1 Location

The BNSF Sangamon Right of Way is located in the City of Chicago, Cook County, and runs from 16th Street south along Sangamon Street to 21st Street. The right of way between 16th and 18th street was fenced off to prevent access and has been assessed separately due to being adjacent to the National Lead Site, which is a site that was in the IEPA voluntary remediation program. The 16th to 18th portion of the site is being handled as an Operable Unit OU\_1. The BNSF right of way is located adjacent to the City of Chicago's right of way which includes Sangamon Street and the sidewalk that runs along the west side of the right of way.

##### 1.1.2.2 Description of Threat

Based on the results of the soil samples collected and analyzed for total lead, 33 soil boring locations on the BNSF ROW have total lead concentrations above 800 mg/kg, which is above the RML for industrial and residential values. In addition, six sample locations were above the TCLP for lead of 5 mg/l, which is above the RCRA criteria and as such this material will have to be managed as a hazardous waste.

The high levels of lead that were documented meet the criteria for a Superfund Removal Action and as such an Administrative Order on Consent was signed with BNSF to conduct the removal of the soil.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

*Refer to PolRep #1 for a summary of Site activities from 6/20/16 to 7/12/16*

Between 7/13/2016 and 8/3/2016 Stiles completed the remaining excavations, placed appropriate demarkation barrier, backfilled with 18" of CA7 stone and 6" of topsoil, and completed grading of the backfilled areas.

On 8/5/2016 Hydro seeding was completed on-site by subcontractor (McGinty Brothers). Backfilled areas were seeded using INDOT Type 2 seed, fertilizer and mulch mix.

On 8/24/2016 EPA (Faryan), BNSF (Jefferies), TRC (Meagher), and START (Kleist) conducted a final site walk to verify that all work was completed.

On 8/25/2016 Stiles and TRC oversaw the installation of a chain link fence around BNSF property to the north of 18th Street.

On the week of 9/16/2016 the silt fence and temporary fence were removed from the site.

U.S. EPA conducted sample of the 16th to 18th Street section of the Sangamon Right of way on October 27, 2016 to re-assess this area and compare the results to previous sampling conducted at the National Lead site. This portion of the Right of way will be handled as Operable Unity OU\_1.

TRC had the survey contractor provide a final survey map which show pre and post excavations. A final report was prepared and submitted to US EPA on November 11, 2016. US EPA will prepare a completion letter once the final report is approved.

**2.1.2 Response Actions to Date**

Refer to PolRep #1 for response actions from 6/20/16 to 7/12/16

A total of 5520.39 tons of non-hazardous soil has been loaded into trucks and transported to Waste Managment Laraway landfill in Joliet, Illinois.

The site was backfilled with 2 feet of clean soil from a burrow source with certified data. The backfill was hydroseded with a Illinois DOT specified seed mixture.

All of the fence, silt fence and signs were removed at the end of the action.

**Regional Metrics**

	Miles of river systems cleaned and/or restored	0
This is an Integrated River Assessment. The numbers should overlap.	Cubic yards of contaminated sediments removed and/or capped	0
	Gallons of oil/water recovered	0
	Acres of soil/sediment cleaned up in floodplains and riverbanks	0
Stand Alone Assessment	Number of contaminated residential yards cleaned up	0
	Number of workers on site	6
Contaminant(s) of Concern	Lead, arsenic, heavy metals,	

**Oil Response Tracking**

Estimated volume	Initial amount released	0
	Final amount collected	0
	FPN Ceiling Amount	0
CANAPS Info	FPN Number	0
	Body of Water affected	0

**Administrative and Logistical Factors (Place X where applicable)**

Precedent-Setting HQ Consultations (e.g., fracking, asbestos)	x	Community challenges or high involvement	Radiological
More than one PRP		Endangered Species Act / Essential Fish Habitat issues	Explosives
X AOC	x	Historic preservation issues	X Residential impacts
UAO		NPL site	Relocation
DOJ involved		Remote location	Drinking water impacted
Criminal Charges Have Been Filed*		Extreme weather or abnormal field season	X Environmental justice
Tribal consultation or coordination or other issues		Congressional involvement	X High media interest
Statutory Exemption for \$2 Million		Statutory Exemption for 1 Year	Active fire present
X Hazmat Entry Conducted – Level A, B or C		Incident or Unified Command established	Actual air release (not threatened)

**Green Metrics** **Directions (Delete in report)**

Metric	Amount	Units	Directions (Delete in report)
Diesel Fuel Used	350	gallons	ERRS fuel use. If possible, can also include estimate of fuel used in trucking subcontracts - estimate via # loads over # miles.
Unleaded Fuel Used	155	gallons	ERRS fuel use. Don't include GOV fuel - tracked elsewhere.
Alternative/E-85 Fuel Used	0	gallons	ERRS fuel use. Don't include GOV fuel - tracked elsewhere.
Electricity from electric company	0	kWh	Total used on site
Electric Company Name and Account #			Helps us calculate sources of power and emissions
Electricity from sources other than the electric company	0	kWh	Onsite energy generation (solar, wind, other)
Solid waste reused	0		Material reused onsite. Examples include reusing excavated material for fill, using flyash to treat for metals, using corn cob to dry waste. Feel free to add as many lines as necessary to capture your materials. Use units most applicable.
Solid waste recycled	0		Material sent off site such as typical recyclables, as well as scrap metal, pallets for cogen, etc. Feel free to add as many lines as necessary to capture your materials. Use units

Final Volumes for Soil and Rail Ties.

<b>Waste Stream</b>	<b>Date</b>	<b># of Trucks</b>	<b>Volume (Tons)</b>
Soil	6/27/2016	27	511.11
Soil	6/28/2016	27	523.33
Soil	6/29/2016	20	405.43
Soil	6/30/2016	24	483.33
Soil	7/1/2016	19	391.59
Soil	7/5/2016	18	384.89
Soil	7/6/2016	25	515.41
Soil	7/7/2016	28	570.26
Soil	7/8/2016	38	799.44
Soil	7/11/2016	20	466.19
Soil	7/12/2016	13	292.93
Soil	7/13/2016	9	176.15
Railroad Ties	6/28/2016	2	18.23
Railroad Ties	6/29/2016	2	34.34
Railroad Ties	6/30/2016	1	13.85
Railroad Ties	7/1/2016	1	15.33
Railroad Ties	7/6/2016	3	46.87
Railroad Ties	7/11/2016	2	26.05
Railroad Ties	7/13/2016	1	11.39
<b>TOTAL</b>			<b>5686.45</b>

## 2.2 Planning Section

### 2.2. Anticipated Activities

All work required under the consent order has been completed and was sent to USEPA on November 11, 2016. A completion letter will be drafted and sent out to BNSF that all requirements of the order have been completed.

#### Sangamon 16th to 18th Street Hook (OU 1)

BNSF granted access to USEPA under an access agreement and has conducting additional sampling on the 16th to 18th street part of the right way. The data has been received and being reviewed. This site will be handled as operable Unit of the Sangamon right way. After the data is reviewed USEPA will evaluate the enforcement options and may bring in additional parties to complete the removal of contaminated soil in this section of the right of way. The work is expected to be completed under a signed order.

The EL Paseo project will be funded and conducted by the City of Chicago to construct a green space and trail along the former right of way. The City of Chicago is negotiating conveying the property over from BNSF and preliminary drawings and plans have been completed.

U.S. EPA has worked with the City of Chicago to have a system set up as an institutional control on the former right of way. The City will place a permit hold on any work conducted in the former right of way. When a permit is applied for to conduct work in the area the City will be notified and the contractor will be notified to properly manage any soil in the area where work is to be completed. Appropriate safety measures would also be instituted if the contractor digs below the 2 foot barrier marking that was placed at the bottom of the excavation. The program will be tied to the Property Identification Number (PIN) number.

## 2.3 Logistics Section

No information available at this time.

## 2.4 Finance Section

### 2.4.1 Narrative

The START cost ceiling is \$30,000.

NO EERS cost the work is for oversight of a consent order. BNSF railroad paid for all response costs.

### Estimated Costs \*

	<b>Budgeted</b>	<b>Total To Date</b>	<b>Remaining</b>	<b>% Remaining</b>
<b>Extramural Costs</b>				

TAT/START	\$30,000.00	\$27,958.00	\$2,042.00	6.81%
<b>Intramural Costs</b>				
USEPA - Direct	\$10,555.00	\$6,300.00	\$4,255.00	40.31%
<b>Total Site Costs</b>	<b>\$40,555.00</b>	<b>\$34,258.00</b>	<b>\$6,297.00</b>	<b>15.53%</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

NA

### 2.5.2 Information Officer

USEPA Community Involvement Coordinator Heriberto Leon has meet with the neighborhood community groups. Fact Sheets were handed out in the 1/2 mile square area around the property. A public meeting and open house were held to provide facts and answer questions from the residents. An open house was held at the neighboring Resurrection Project apartments to brief the residents and media and answer questions.

U.S. EPA has provided fact sheets. All of the fact sheets have been reproduced in English and Spanish.

An open house was held on June 15, 2016 at the CASA Maravilla at 2021 S. Morgan in Chicago, Illinois from 5-7. Approximately 30 residences attended the open house.

U.S. EPA maintained and updated the website during and after the clean up operations to inform the Citizens and community groups.

## 3. Participating Entities

### 3.1 Unified Command

US EPA is providing oversight of BNSF contractors

### 3.2 Cooperating Agencies

City of Chicago

## 4. Personnel On Site

No personnel on site

## 5. Definition of Terms

BNSF-Burlington Northern Santa Fe

RCRA-Resource Conservation and Recovery Act

RML-Removal Management Levels

ROW-Right of Way

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

[www.epaosc.org/sangamonstreet](http://www.epaosc.org/sangamonstreet)

<https://www.epa.gov/il/sangamon-right-way>

### 6.2 Reporting Schedule

This is the final PolRep for the Sangamon Street Right of Way Site.

## 7. Situational Reference Materials

No information available at this time.