

May 16, 2022

Verneta Simon  
U.S. Environmental Protection Agency  
Region 5  
77 W. Jackson Blvd., SE-5J  
Chicago, IL 60604

RE: Thorium Monitoring at 300 N. Michigan Avenue  
Final Report November 9, 2021 – May 1, 2022

Dear Ms. Simon:

This report is being submitted by Stan A. Huber Consultants, Inc. (SAHCI) on behalf of 300 N. Michigan, LLC c/o Sterling Bay, LLC. SAHCI was hired by 300 N. Michigan, LLC to provide radiological monitoring during demolition and construction activities at 300 and 310 N. Michigan Avenue in Chicago, Illinois. This report covers monitoring performed by SAHCI from November 9, 2021 – May 1, 2022.

Interim thorium monitoring reports have been submitted to USEPA for this project, as follows:

<u>Report Date</u>	<u>Monitoring Period</u>
1/7/20	9/19/19 -12/31/19
10/12/20	1/1/20 – 9/30/20
12/22/20	10/1/20 – 12/21/20
11/9/21	12/22/20 – 11/8/21

Thorium monitoring was conducted in accordance with the *Thorium Investigation Work Plan for 300 N. Michigan Ave, Chicago, Illinois*, revision dated November 25, 2019 (Work Plan). Per the Work Plan, monitoring for thorium is required during construction activities involving the disturbance or exposure of subsurface fill. The removal action level for thorium at the site has been established as 7.1 picocuries per gram (pCi/g) total radium (radium-226 + radium-228).

Thorium monitoring was performed for the following construction activities during this monitoring period:

- Concrete Restoration (Sidewalk, Curb, Street) 10/22/20-11/9/20

#### Instrumentation

Surface gamma scans were performed using a Ludlum Model 2221 Scaler / Ratemeter (serial no. 126497) with attached Ludlum Model 44-10 2"x2" NaI detector (w/ 6" lead collimator shield). This meter was calibrated on May 5, 2021. The USEPA action level of 7.1 pCi/g total radium count rate correlation for the instrument is 6,383 counts per minute (cpm).

The background count rate averaged 1,741 cpm during the excavation along the sidewalk and streets on Lower E. South Water Street and Lower Michigan Avenue.

### Surface Gamma Scans

Removal of concrete along the sidewalks and streets adjacent to the property took place from on April 4, April 6, and April 24 – April 26, 2022. Survey data was collected by measuring the surface and then again after concrete removal to a maximum depth of 12 inches below ground surface. The gross count rates in the excavations ranged from 1,400 cpm to 3,500 cpm. No count rates were observed at any time that exceeded the instrument specific threshold limit of 6,383 cpm.

### Asbestos

Although no specific asbestos testing was performed, soils were visually screened during excavation for evidence of potentially asbestos containing mantles or mantle strings, per Section 4.1 of the Work Plan. No potentially asbestos-containing materials were identified, so no abatement is required at this time.

### Conclusions

Since no count rates were identified above the 7.1 pCi/gram Removal Action Level, no additional soil sampling, air monitoring, or personnel monitoring were performed. As of May 1, 2022, no radiological contamination has been identified which would require notification of USEPA and/or remediation.

### Upcoming Work Schedule

Native material has been reached at all locations and no fill material remains on the property within the building footprint. All right of way work involving subsurface activities has concluded.

No further thorium monitoring is expected to be performed at this location.

Thank you for your assistance with this project. I will be providing a copy of this report to the City of Chicago Department of Public Health, as required. If you have any questions or need additional information, please call me at (815) 485-6161.

Sincerely,  
Stan A. Huber Consultants, Inc.



Glenn Huber, CHP  
President

## Radiation Survey Form

**Location/ Project ID:** 300 N. Michigan Ave.

4/4/22, 4/6/22, &

**Date:** 4/22/22 - 4/26/22

**Technician:** Brian Schmidt

**Inst Model:** Ludlum 2221

**Serial No. :** 126497

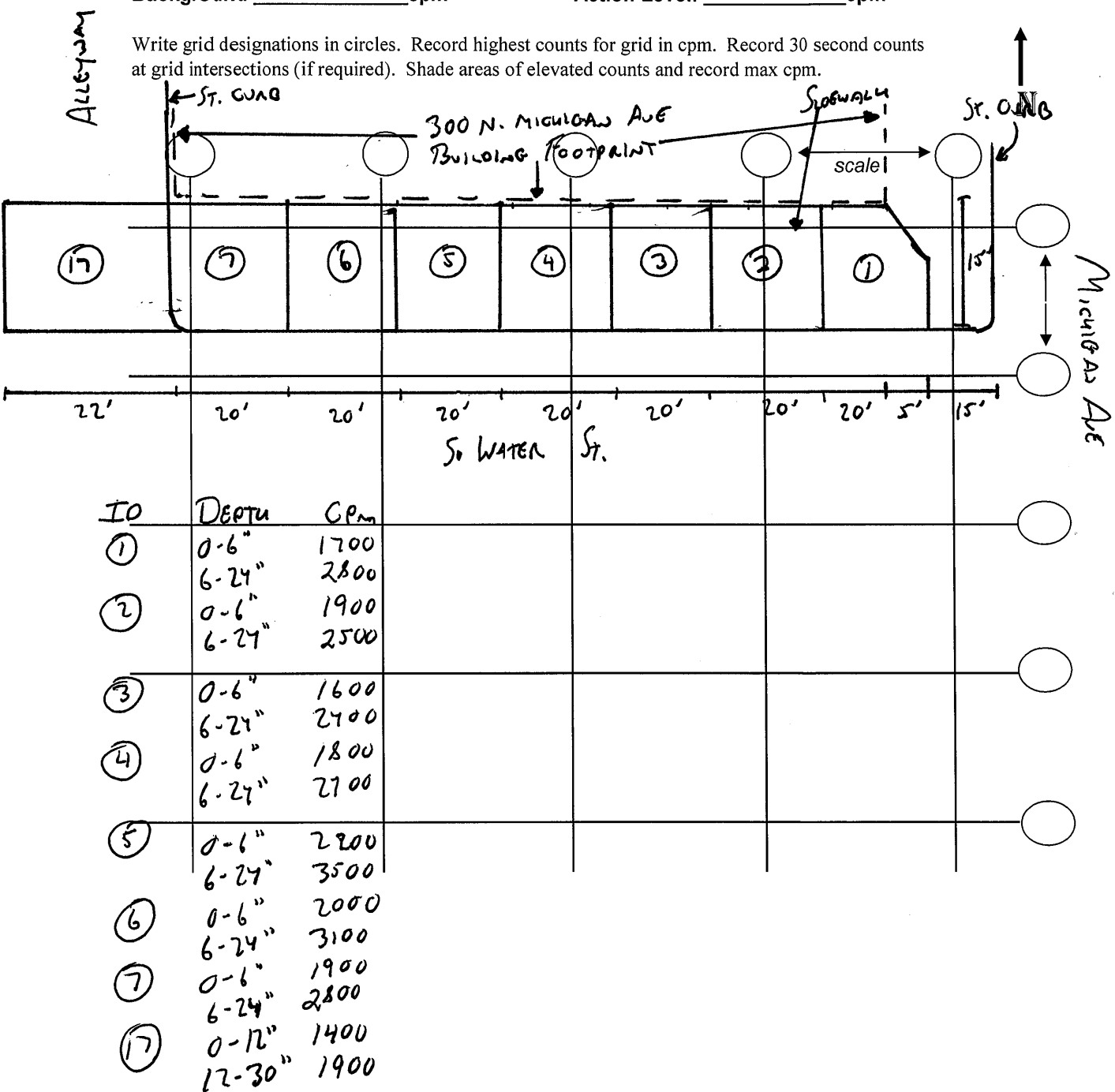
**Probe Type:** 1"x1" NaI / 2"x2" NaI  
Shielded / Not Shielded

**Lift Elevation:** Surface to -12"

**Background** 1,741 cpm

**Action Level:** 6,383 cpm

Write grid designations in circles. Record highest counts for grid in cpm. Record 30 second counts at grid intersections (if required). Shade areas of elevated counts and record max cpm.



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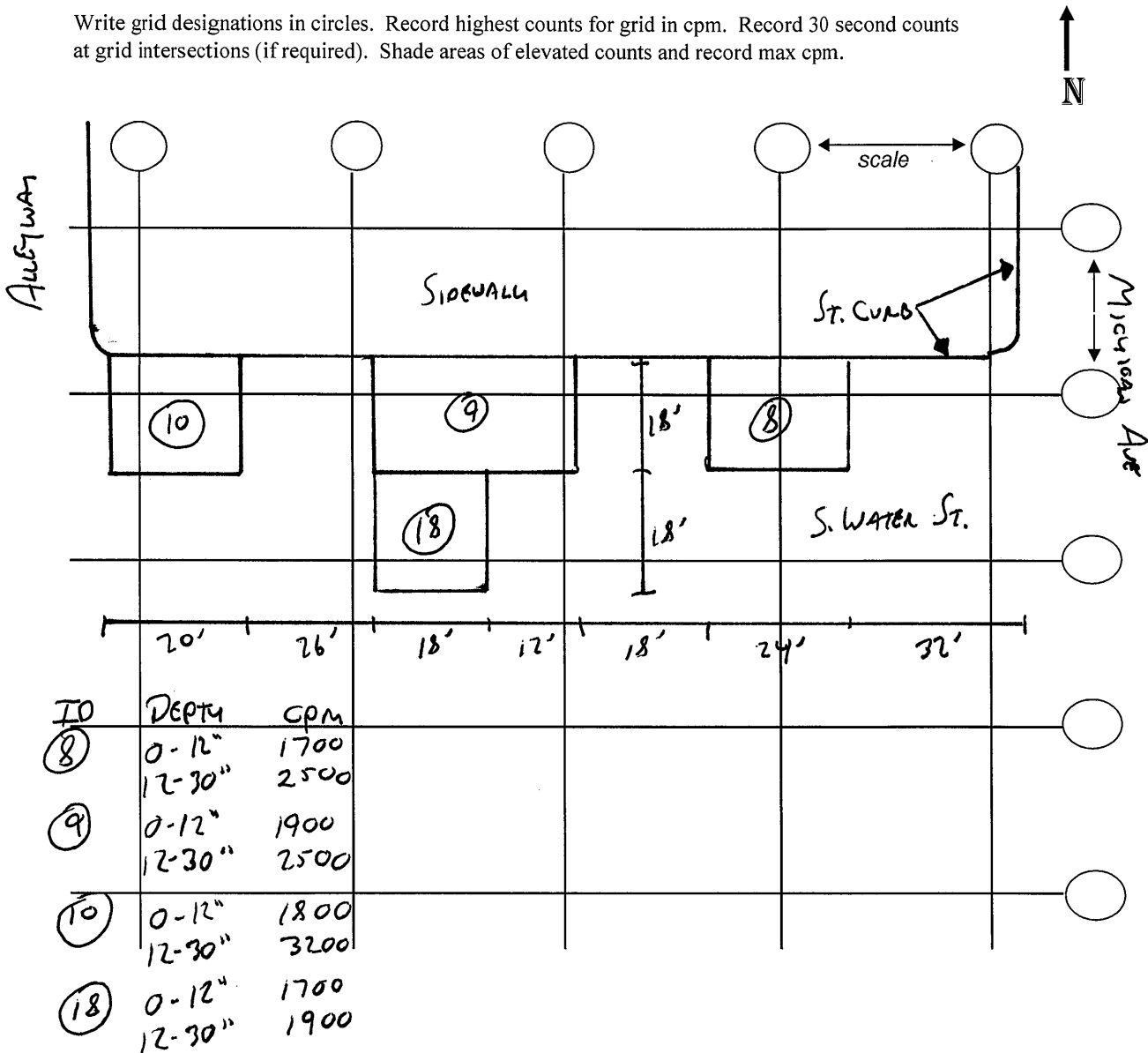
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