Division File

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORAI

DATE: December 18, 1990

TO: Division File

FROM: Steve Gobelman, Project Manager

SUBJECT: 031600067 -- Cook County
Chicago/Paxton Avenue Lagoons
Superfund/Technical Reports

EPA Region 5 Records Ctr.
261547

Sampling Protocol for PCB's

Weston is required by the Division of Air Pollution Control's permit to sample all material to be incinerated for PCB's, BTU's, and TOC. Weston divided an area of contaminated soil into 4 piles. Each pile was analyzed according to Weston's permit.

On December 7, 1990 Weston informed the Agency that a pile had been analyzed and determined to have over 50 ppm PCB's, which would make that pile regulated under TSCA. Therefore, the pile cannot be incinerated on-site without notifying USEPA to activate the Weston's National TSCA Permit. Ultimately, piles 1, 2, and 3 indicated levels over 50 ppm PCB's. The fourth pile showed levels under 50 ppm. The Agency notified USEPA-Region V concerning sampling procedure for PCB's. Weston had been taking composite samples of the 4 side walls and a sample from the top of the pile. All 5 samples were sent to Gulf Coast Laboratory. According to John Love of USEPA-Region V TSCA Unit, the proper sampling of a pile for PCB's is to sample of the 4 side walls, top, and the center of the pile, then composite the 6 samples into one sample for analysis.

Using the new sampling procedures pile 3 had PCB's levels under 50 ppm but the first 2 piles remained over 50 ppm for PCB's. These 2 piles will have to be handled as TSCA waste. Therefore, Weston has been directed the incinerate the 2 piles that contain less than 50 ppm PCB's and set aside the piles that contain over 50 ppm PCB's. Attached are the corresponding analytical of the piles for PCB's.

Project File

WSI
Weston Services, Inc.

0316000067 - Cook
Chicago/Paxton Ave Lagoon
superfund/Tech Rep +

December 7, 1990

Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, IL 62706

W.O. #1104-05-01

Attention: Mr. Jim Janssen

Reference: Agency Contract No. BIE-9035
Paxton Avenue Lagoons Site
Chicago, Illinois - LPC #0316000067

Subject: PCB's in Soil Stockpile

Dear Jim:

This is to confirm our discussions relating to concentrations of PCB's determined to be present in a stockpile at Paxton. Analytical results indicate management will be TSCA regulated. This is also to advise you that WESTON is incurring extra costs due to this changed condition (expedited analytical samples).

A stockpile containing approximately 700 cubic yards of waste has been analyzed and found to contain PCB levels greater than 50 ppm. WESTON will not handle this stockpiled waste until we are given direction from IEPA.

We have formed and sampled another stockpile. We will be incurring extra cost since we have expedited turnaround on these samples in order to have the results back by next Tuesday, 11 December. It is estimated that unless this new stockpiled material is acceptable (less than 50 ppm PCB's) for incineration under the present permit, WESTON will run out of feed material sometime on Tuesday. If this occurs we may have to go on standby until other stockpiles are formed and analyzed. WESTON will expect relief from the Agency for the standby costs incurred due to this changed condition.

As you are aware, our National TSCA Permit contains requirements that must be satisfied prior to incineration of PCB's (TSCA). Requirements are dependent on the operational time needed to process the waste.

Please advise us whether we should be contacting USEPA to prepare for incineration of the TSCA waste. We would appreciate any ideas you may have to alleviate this situation. If you have any questions regarding this matter do not hesitate to contact me.

Very truly yours,

WESTON SERVICES, INC.

Luis A. Velazquez, P.E.
Department Manager -
Field Production

LAV:imn

Enclosures

cc: Mr. Jim Cobb, IEPA Air Division
Mr. Steve Gobelman, IEPA
Mr. John Noland, WSI
Mr. Tim Forden, WSI
Mr. Mike Pantaloni, WSI

IEPA2.D07/LAV

Roy F. Weston, Inc. - Gulf Coast Laboratories
PCBs by GC

RFW Batch Number: 90116625 Client: WSI-Paxton Lagoon Work Order: 3600-03-07-0000 Report Date: 12/02/90 17:41 Page: 1

	Cust ID:	1 Main Lagoon		2 Main Lagoon		3 Main Lagoon		3 Main Lagoon		3 Main Lagoon		4 Main Lagoon	
Sample Information	RFW#:	001		002		003		003 MS		003 MSD		004	
	Matrix:	SOIL		SOIL		SOIL		SOIL		SOIL		SOIL	
	D.F.:	250		50.0		50.0		50.0		50.0		50.0	
	Units:	ug/Kg		ug/Kg		ug/Kg		ug/Kg		ug/Kg		ug/Kg	
Surrogate: Di-n-butylchlorendate		D	% fl	D	% fl	D	% fl	D	% fl	D	% fl	D	% fl
Aroclor-1016		28000	U	5500	U	5800	U	5800	U	5800	U	5700	U
Aroclor-1221		28000	U	5500	U	5800	U	5800	U	5800	U	5700	U
Aroclor-1232		28000	U	5500	U	5800	U	5800	U	5800	U	5700	U
Aroclor-1242		110000		5500	U	5800	U	5800	U	5800	U	5700	U
Aroclor-1248		28000	U	26000		29000		29000		29000		41000	
Aroclor-1254		55000	U	11000	U	12000	U	D	%	D	%	11000	U
Aroclor-1260		31000	J	22000		22000		22000		21000		29000	

	Cust ID:	5 Main Lagoon		6 Main Lagoon		7 Main Lagoon		8 Main Lagoon		9 Main Lagoon		10 Main Lagoon	
Sample Information	RFW#:	005		006		007		008		009		010	
	Matrix:	SOIL		SOIL		SOIL		SOIL		SOIL		SOIL	
	D.F.:	50.0		50.0		50.0		50.0		50.0		50.0	
	Units:	ug/Kg		ug/Kg		ug/Kg		ug/Kg		ug/Kg		ug/Kg	
Surrogate: Di-n-butylchlorendate		D	% fl	D	% fl	D	% fl	D	% fl	D	% fl	D	% fl
Aroclor-1016		5400	U	5700	U	5600	U	5200	U	5800	U	5800	U
Aroclor-1221		5400	U	5700	U	5600	U	5200	U	5800	U	5800	U
Aroclor-1232		5400	U	5700	U	5600	U	5200	U	5800	U	5800	U
Aroclor-1242		5400	U	5700	U	5600	U	5200	U	5800	U	54000	
Aroclor-1248		30000		35000		35000		49000		28000		5800	U
Aroclor-1254		11000	U	11000	U	11000	U	10000	U	12000	U	12000	U
Aroclor-1260		20000		22000		29000		36000		24000		27000	

U= Analyzed, not detected. J= Present below detection limit. B= Present in blank. NR= Not requested. NS= Not spiked.
%= Percent recovery. D= Diluted out. I= Interference. NA= Not Applicable. *= Outside of EPA CLP QC

:n Number: 9012G074 Client: WSI-Paxton Lagoon Work Order: 3600-03-87-0000

	Cust ID:	1 Main Lagoon	1 Main Lagoon	1 Main Lagoon	2 Main Lagoon	3 Main Lagoon	4
	RFW#:	001	001 MS	001 MSD	002	003	
:ion	Matrix:	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL
	D.F.:	50.0	50.0				
	D.F.:	50.0	50.0	50.0	50.0	50.0	50.0
	Units:	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg

e: Di-n-butylchlorendate	I	%	I	%	I	%	I	%	I	%	I	%
		fl		fl		fl		fl		fl		fl
1016	1100	U	1100	U	1100	U	1100	U	1100	U	1200	U
1221	1100	U	1100	U	1100	U	1100	U	1100	U	1200	U
1232	1100	U	1100	U	1100	U	1100	U	1100	U	1200	U
1242	1100	U	1100	U	1100	U	1100	U	1100	U	1200	U
1248	27000		25000		24000		14000		14000		23000	
1254	2200	U	D	%	D	%	2100	U	2300	U	2300	U
1260	15000		15000		14000		10000		11000		15000	

	Cust ID:	5 Main Lagoon	PBLK	PBLK BS	PBLK BSD
	RFW#:	005	90GP0698-MB1	90GP0698-MB1	90GP0698-MB1
ion	Matrix:	SOIL	SOIL	SOIL	SOIL
	D.F.:	50.0	5.00	5.00	5.00
	Units:	ug/Kg	ug/Kg	ug/Kg	ug/Kg

e: Di-n-butylchlorendate	I	%	54	%	58	%	61	%				
		fl		fl		fl		fl		fl		fl
1016	1100	U	80	U	80	U	80	U				
1221	1100	U	80	U	80	U	80	U				
1232	1100	U	80	U	80	U	80	U				
1242	1100	U	80	U	80	U	80	U				
1248	24000		80	U	80	U	80	U				
1254	2200	U	160	U	102	%	105	%				
1260	16000		160	U	160	U	160	U				

:ed, not detected. J= Present below detection limit. B= Present in blank. NR= Not requested. NS= Not spiked.
:t recovery. D= Diluted out. I= Interference. NA= Not Applicable. *= Outside of EPA CLP QC

RFW Batch Number: 90126154 Client: WSI-Paxton Lagoon Work Order: 3600-03-87-0000

	Cust ID:	Composite #1	Composite #1	Composite #1	Composite #2	PBLK	
Sample Information	RFW#:	001	001 MS	001 MSD	002	90GP0706-MB1	90
	Matrix:	SOIL	SOIL	SOIL	SOIL	SOIL	
	D.F.:	50.0	50.0	50.0	50.0	5.00	
	Units:	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/

Surrogate: Di-n-butylchlorendate	I	%	I	%	I	%	I	%	65	%	63
		fl		fl		fl		fl		fl	
Aroclor-1016	1100	U	1100	U	1100	U	1100	U	80	U	80
Aroclor-1221	1100	U	1100	U	1100	U	1100	U	80	U	80
Aroclor-1232	1100	U	1100	U	1100	U	1100	U	80	U	80
Aroclor-1242	1100	U	1100	U	1100	U	1100	U	80	U	80
Aroclor-1248	30000		31000		31000		26000		80	U	80
Aroclor-1254	2100	U	D	%	D	%	2300	U	160	U	96
Aroclor-1260	12000		13000		13000		17000		160	U	160

	Cust ID:	PBLK BSD
Sample Information	RFW#:	90GP0706-MB1
	Matrix:	SOIL
	D.F.:	5.00
	Units:	ug/Kg

Surrogate: Di-n-butylchlorendate	65	%										
		fl		fl		fl		fl		fl		fl
Aroclor-1016	80	U										
Aroclor-1221	80	U										
Aroclor-1232	80	U										
Aroclor-1242	80	U										
Aroclor-1248	80	U										
Aroclor-1254	103	%										
Aroclor-1260	160	U										

U= Analyzed, not detected. J= Present below detection limit. B= Present in blank. NR= Not requested. NS= Not spike
%= Percent recovery. D= Diluted out. I= Interference. NA= Not App

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To Steve Gobelman	From Mike Pantaloni
Co. IEPA	Co. WSI
Dept. LAND DIVISION	Phone # 312 646-6593
Fax # 217 524-4193	Fax # 5131

1D
PESTICIDE ORGANIC ANALYSIS

Customer Sample No.

PILE 1

Lab Name: ARDL, Inc. Contract: PAXTON AVE LAGOON
Lab Code: _____ Case No.: 200196 SAS No.: ____ SDG No.: ____

Matrix (soil/water) : SOIL Lab Sample ID : 200196-1
Sample wt/vol : 1.0 (g/mL) g Lab File ID :
Level (low/med) : MED Date Received : 12/13/90
% Moisture (not dec): 29 dec. - Date Extracted : 12/13/90
Extraction (Sepf/Cont/Sonc): SONC Date Analyzed : 12/14/90
GPC Cleanup (Y/N): No pH: Dilution Factor: 1.0

CAS No.	Compound	Concentration Units: ug/Kg (ug/L or ug/Kg)	Q
319-84-6	alpha-BHC		
319-85-7	beta-BHC		
319-86-8	delta-BHC		
58-89-9	gamma-BHC(Lindane)		
76-44-8	Heptachlor		
309-00-2	Aldrin		
1024-57-3	Heptachlor epoxide		
959-98-8	Endosulfan I		
60-57-1	Dieldrin		
72-55-9	4,4'-DDE		
72-20-8	Endrin		
33213-65-9	Endosulfan II		
72-54-8	4,4'-DDD		
1013-07-8	Endosulfan sulfate		
50-29-3	4,4'-DDT		
72-43-5	Methoxychlor		
53494-70-5	Endrin ketone		
5103-71-9	alpha-Chlordane		
5103-74-2	gamma-Chlordane		
8001-35-2	Toxaphene		
12674-11-2	Aroclor 1016	1700	U
11104-28-2	Aroclor 1221	1700	U
11141-16-5	Aroclor 1232	1700	U
53469-21-9	Aroclor 1242	140000	
12672-29-6	Aroclor 1248	1700	U
11097-69-1	Aroclor 1254	100000	
11096-82-5	Aroclor 1260	39000	

1D
PESTICIDE ORGANIC ANALYSIS

Customer Sample No.

PILE 2

Lab Name: ARDL, Inc. Contract: PAXTON AVE LAGOON
Lab Code: _____ Case No.: 200196 SAS No.: ____ SDG No.: ____

Matrix (soil/water) : SOIL
Sample wt/vol : 1.0 (g/mL) g
Level (low/med) : MED
% Moisture (not dec): 28 dec. -
Extraction (Sepf/Cont/Sonc): SONC
GPC Cleanup (Y/N): No pH:

Lab Sample ID : 200196-2
Lab File ID :
Date Received : 12/13/90
Date Extracted : 12/13/90
Date Analyzed : 12/14/90
Dilution Factor: 1.0

CAS No.	Compound	Concentration Units: ug/Kg (ug/L or ug/Kg)	Q
319-84-6	alpha-BHC		
319-85-7	beta-BHC		
319-86-8	delta-BHC		
58-89-9	gamma-BHC(Lindane)		
76-44-8	Heptachlor		
309-00-2	Aldrin		
1024-57-3	Heptachlor epoxide		
959-98-8	Endosulfan I		
60-57-1	Dieldrin		
72-55-9	4,4'-DDE		
72-20-8	Endrin		
33213-65-9	Endosulfan II		
72-54-8	4,4'-DDD		
1013-07-8	Endosulfan sulfate		
50-29-3	4,4'-DDT		
72-43-5	Methoxychlor		
53494-70-5	Endrin ketone		
5103-71-9	alpha-Chlordane		
5103-74-2	gamma-Chlordane		
8001-35-2	Toxaphene		
12674-11-2	Aroclor 1016	1700	U
11104-28-2	Aroclor 1221	1700	U
11141-16-5	Aroclor 1232	1700	U
53469-21-9	Aroclor 1242	140000	
12672-29-6	Aroclor 1248	1700	U
11097-69-1	Aroclor 1254	100000	
11096-82-5	Aroclor 1260	39000	