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NSTC GREAT LAKES
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LETTER AND ILLINOIS ENVIRONMENTAL PROTECTION AGENCY COMMENTS TO LONG
TERM GROUNDWATER MONITORING REPORT ROUND 14 MAY 2011 SITES 2 AND 3
NSTC GREAT LAKES IL
11/21/2011
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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November 21, 2011

Department of the Navy
EFA Midwest
Attn: Bill Busko
Building 1A, Environmental Department
201 Decatur Avenue
Great Lakes, Illinois 60088-5600

Re: Long-Term Groundwater Monitoring
Report Round 14 (May 2011) for
Sites 2 and 3, Naval Station Great Lakes
Great Lakes, Illinois

0971255048 – Lake
Great Lakes Naval Station
Superfund/Technical

Dear Mr. Busko:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's above-listed report, which was drafted by Tetra Tech NUS, Inc. on behalf of the Naval Facilities Engineering Command (Navy). It was dated October 2011 and was received at the Agency on November 16, 2011.

The submittal included five years (fourteen time points) of supporting documentation and requested the removal of a list of parameters (contaminants) from the routine monitoring list for groundwater analysis at Sites 2 and 3. It also requested a reduction in frequency from semi-annual to annual sampling. The Agency has reviewed the monitoring results, the associated tables and trend graphs, and the Agency-approved Sampling and Analysis Plan for these sites. Illinois EPA provides the following response.

Sites 2 and 3, Forrestal and Supplyside Landfills, stopped receiving waste roughly 42 and 28 years ago, respectively. Cover and gas management systems were installed in 2004 with groundwater monitoring beginning in 2006. As of May 2011, five years (fourteen rounds) of groundwater samples have been collected from each of 6 monitoring wells at each site.

After careful consideration of all of the submitted data, Illinois EPA can concur with the reduction in frequency to annual sampling for both sites. The Agency can also concur with some

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of the justification for removing parameters, but cannot agree to the entire list that has been proposed for removal.

The following parameters for **Site 2** must be retained for monitoring:

- VOCs: benzene, toluene, cis-1,2-dichloroethene, vinyl chloride, and tetrahydrofuran
- SVOCs: PAHs and DEHP only
- TAL metals (dissolved only)
- General water chemistry: ammonia, chloride, nitrate, sulfate, TDS, TSS, and pH

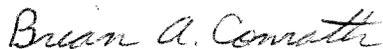
The following parameters for **Site 3** must be retained for monitoring:

- SVOCs: PAHs and DEHP only
- Herbicides: MCPA and MCPP
- TAL metals (dissolved only)
- General water chemistry: ammonia, chloride, nitrate, sulfate, TDS, TSS, and pH

Reasons for parameters remaining on the monitoring list included; recent detections, the parameter being reasonably expected to be found in the leachate of those landfills, a significant upward trend in the data, or inclusion on the basic L1 list of routine monitoring parameters.

If you have any questions regarding anything in this letter or require additional information, please contact me at (217) 557-8155 or via electronic mail at Brian.Conrath@illinois.gov.

Sincerely,



Brian A. Conrath
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

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cc: Bob Davis, Tetra Tech NUS, Inc.