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NSTC GREAT LAKES
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LETTER AND ILLINOIS ENVIRONMENTAL PROTECTION AGENCY RESPONSE TO U S
NAVY COMMENTS TO DRAFT FINAL REMEDIAL ACTION PLAN SITE 17 PETTIBONE
CREEK NSTC GREAT LAKES IL
4/17/2012
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

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April 17, 2012

Engineering Field Activity, Midwest
Attn: Mr. Ben Simes
Building 1A, Code 931
201 Decatur Avenue
Great Lakes, Illinois 60088-5600

Re: Draft Final Remedial Action Plan
For Site 17 - Pettibone Creek
Naval Station, Great Lakes
Great Lakes, Illinois

0971255048 — Lake
Great Lakes Naval Station
Superfund/Technical

Dear Mr. Simes:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's responses to Agency comments on the *Revised Draft Remedial Action Plan for Pettibone Creek, Naval Station Great Lakes* as well as the Draft Final version of the document. They were dated March 2011 and were received at the Agency in hard copy and via electronic mail on April 3, 2012. The Remedial Action Plan (RAP) includes the excavation and offsite disposal of contaminated sediment located within the North Branch of Pettibone Creek. In addition, the RAP activities include stream restoration. This RAP was prepared for the United States Navy, Naval Facilities Engineering Command Midwest, by Tetra Tech NUS, Inc. Illinois EPA has conducted a review of the entire submittal and is providing some additional comments generated during that review.

- 1) **Response to Comment Numbers 1-2** — Response acceptable.
- 2) **Response to Comment Number 3** — The date has been revised from May 2009 to March 2011, but should be March 2012.
- 3) **Response to Comment Numbers 4-5** — Response acceptable.
- 4) **Response to Comment Number 6** — The response states the Navy is in agreement. However, the requested change has not been made. Response unacceptable.

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- 5) **Response to Comment Number 7** — While the requested information is stated to be in the Note on Table 3-1, that is not sufficient. The proper disposal of the wash water should be addressed in the text in this section as well. Currently it reads "Wash water will be filtered, characterized, and discharged to the creek or tributary." The insinuation here is that regardless of the results of the characterization, the creek will be the discharge point. That is inaccurate and could mislead a future Navy contractor.
- 6) **Response to Comment Number 8** — See the previous comment.
- 7) **Response to Comment Numbers 9-11** — Response acceptable.
- 8) **Response to Comment Number 12** — The Table has **not** been edited as stated in the response.
- 9) **Response to Comment Numbers 13-19** — Response acceptable.
- 10) **Response to Comment Number 20** — Response acceptable, as long as the influence on and from those tributaries has been properly accounted for in the modeling.
- 11) **Response to Comment Numbers 21-22** — Response acceptable.
- 12) **Response to Comment Number 23** — Response noted. However, the reviewer could not find any discussion within the Plan regarding the appropriate action or with whom the Navy would coordinate to determine said action. This needs to be addressed in the Work Plan. It should also be noted that during the recent benthic invertebrate sampling in the creek (March 2012), numerous other fish (steelhead and some type of sucker) were spotted in the North Branch, some of which were at least 18 inches long.
- 13) **Response to Comment Number 24** — Response noted. Suggest the Navy and Illinois EPA agree to keep the biological survey on the table, although on hold, until sufficient funding can be allocated or a third party identified to conduct the survey.
- 14) **Response to Comment Number 25** — Response noted. Please keep these items in mind as this project moves forward.
- 15) **Response to Comment Number 26** — Response acceptable. The State will keep an open mind when evaluating whether specific stabilization methods are appropriate for use in Pettibone Creek.
- 16) **Response to Comment Number 27** — Response acceptable.

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

In accordance with Public Act 96-0603, which went into effect on August 24, 2009, any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

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.
Owen Thompson, USEPA (SR-6J)