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NSTC GREAT LAKES
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LETTER AND COMMENTS FROM ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
REGARDING DRAFT FOCUSED FEASIBILITY STUDY FOR SITE 19 SMALL ARMS RANGE
910 NSTC GREAT LAKES IL
7/9/2012
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

JOHN J. KIM, INTERIM DIRECTOR

(217) 557-8155
(FAX) 782-3258

July 9, 2012

NAVFAC Midwest IPT EV
Attn: Ms. Terese Van Donsel
Building 1 A
201 Decatur Avenue
Great Lakes, Illinois 60088-2801

Re: Draft Focused Feasibility Study for
Site 19 — Small Arms Range 910
Naval Station Great Lakes
Great Lakes, Illinois

0971255048 — Lake County
Great Lakes Naval Station
Superfund/Technical

Dear Ms. Van Donsel:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's *Draft Focused Feasibility Study for Site 19 — Small Arms Range 910, Naval Station Great Lakes, Great Lakes, Illinois*. The Focused Feasibility Study (FS) was drafted by Tetra Tech NUS, Inc. on behalf of the Naval Facilities Engineering Command Midwest (Navy). It was dated May 2012 and was received at the Agency on May 14, 2012. The FS presents the development and evaluation of remedial alternatives for the remediation for current and hypothetical future land use activities at this site. The Agency has conducted a review of this submittal and is herein providing comments generated during that review.

- 1) **Section 1.2.2** — On page 1-5, the second paragraph states the CTE HIs for the future child resident and the future construction worker are less than or equal to 1.0. This is inaccurate. According to the RI, the CTE HI for the future construction worker was 5.0.
- 2) **Section 2.1.2.1 and Table 2-1** — Other TBCs to be listed on the Federal Chemical-Specific ARARs Tables would include the following:
 - Preliminary Remediation Goals, U.S. EPA Region 9, most recent
 - Generic Soil Screening Levels, U.S. EPA, most recent
- 3) **Section 2.1.2.3 and Table 2-3** — Federal Action-Specific ARARs would include the following:

4302 N. Main St., Rockford, IL 61103 (815)987-7760
595 S. State, Elgin, IL 60123 (847)608-3131
2125 S. First St., Champaign, IL 61 820 (217)278-5800
2009 Mall St., Collinsville, IL 62234 (618)346-5120

951 1 W. Harrison St., Des Plaines, IL 60016 (847)294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309)693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200
1 00 W. Randolph, Suite 11-300, Chicago, IL 60601 (312)814-6026

- Occupational Safety and Health Administration Standards, 29 CFR 1910.120
 - Soil Conservation Act, U.S.C. 5901 et seq.
- 4) **Section 2.1.2.3 and Table 2-3** — Other State Action-Specific ARARs would include the following:
- Illinois Solid Waste and Special Waste Hauling, 35 Illinois Administrative Code (IAC) 809
 - Illinois Environmental Protection Act, 415 Illinois Compiled Statute 5/1, Titles II, III, V, and VI
- 5) **Section 2.3** — In the last line on page 2-4, it lists 32 mg/kg as the Illinois EPA TACO Soil Remediation Objective for chromium. That value is incorrect unless using the pH-specific soil remediation objective for a soil pH between 7.25 and 7.74. The text should be clear as to from where this value was obtained. If the pH-specific objective is not used, the proper objective would be the background value of 16.2.
- 6) **Section 4.3.1.2** — Under State Acceptance, it states that the State could accept Alternative 1 if the concentrations of PAHs and inorganics in site soil are ultimately determined to be consistent with background concentrations for the Metropolitan Statistical Area. Although Illinois EPA does not recall having provided that determination, the premise is basically accurate. However, while the PAH concentrations appear to be within the listed background concentrations for the Metropolitan Statistical Area, the inorganic concentrations are not. Therefore, while the statement is true, the data do not support such a determination.
- 7) **Section 4.3.2.2** — The cost for Alternative 2 appears to be over-estimated. When compared with the projected land use control costs for Site 22, a similar sized site with the same land use controls, in the 2008 Record of Decision (<\$50,000), the estimate here is nearly 4 times higher. Has the cost of this work really quadrupled in the last 4 years?
- 8) **Figure 4-1** — In the text of the FS, the removal is stated to meet the remedial objectives for arsenic, chromium, manganese, and lead. However, the figure identifies only arsenic and manganese at the soil locations used for determining the limits of excavation. Do the chromium and lead concentrations have any effect on the limits of excavation or do they coincide with the arsenic and manganese locations? In addition, the figure shows manganese concentrations that are below the PRG for manganese of 1600 mg/kg. This should be corrected to show only samples that are in exceedance of the PRG, should it not?

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

Draft Focused Feasibility Study for
Site 19 — Small Arms Range 910
Naval Station Great Lakes
July 9, 2012
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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)