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NSTC GREAT LAKES  
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LETTER AND COMMENTS FROM ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
REGARDING DRAFT TIER II SAMPLING AND ANALYSIS PLAN SITE 17 NSTC GREAT  
LAKES IL  
3/13/2012  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

**Archived:** Thursday, July 19, 2012 10:01:22 AM  
**From:** Simes, Benjamin W CIV NAVFAC MW, EV  
**Sent:** Tuesday, March 13, 2012 4:50:38 PM  
**To:** Conrath, Brian A.; Davis, Robert  
**Cc:** Hickey, Howard M CIV NAVFAC MW EV  
**Subject:** RE: Draft Site 17 Tier II Sampling and Analysis Plan  
**Importance:** Normal

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Brian,  
Thanks for the quick turn around time, much appreciated. I better let Bob answer number four, before I get my self into trouble.

Benjamin Simes, CHMM  
Environmental Scientist  
NAVFAC MW IPT EV  
201 Decatur Avenue, Building 1A  
Great Lakes, IL 60088-2801  
F 847-688-6567  
P 847-688-2600x 320

-----Original Message-----

From: Conrath, Brian A. [<mailto:Brian.Conrath@Illinois.gov>]  
Sent: Tuesday, March 13, 2012 10:24  
To: Simes, Benjamin W CIV NAVFAC MW, EV; Davis, Robert  
Subject: Draft Site 17 Tier II Sampling and Analysis Plan

Draft Site 17 Tier II Sampling and Analysis Plan  
0971255048 - Lake

Naval Station Great Lakes  
Great Lakes Naval Station

Great Lakes, Illinois  
Superfund/Technical

Mr. Simes,  
As requested, Illinois EPA is providing our comments on the above listed document via electronic mail. A paper copy of this correspondence will be submitted to the Agency's files upon transmittal.

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's Draft Tier II Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan), Naval Station Great Lakes, Great Lakes, Illinois. The submitted document was drafted by Tetra Tech NUS, Inc. on behalf of the Naval Facilities Engineering Command Midwest (Navy). It was dated March 2012 and was received at the Agency via electronic mail on March 07, 2012 and via regular mail on March 08, 2012. The submittal describes the sediment characterization investigation in support of the Feasibility Study for Site 17 - Pettibone Creek. The Agency has conducted an expedited review of this submittal and is herein providing comments generated during that review. Please be advised, the State's review was not as thorough as it normally would be due to the short turn-around time requested. Therefore, Illinois EPA reserves the right to provide additional comments, specifically regarding the project screening levels, at a later date. Given the proposed schedule, those comments may be incorporated into our comments on the draft report. The provided comments also do not include input from the Illinois Department of Natural Resources (IDNR). Any comments generated by IDNR will be submitted separately.

1) Section 4.4 - It is listed here that the elevation of the top of the bluffs is approximately 600 feet and the elevation at the Boat Basin is 577 feet above mean sea level. If the bluffs rise 70 feet above the beach as is stated in Section 4.2, the then the elevation of the bluffs must be approximately 650 feet above mean

sea level.

- 2) Section 7.0 - There are 3 sediment samples to be collected in the North Branch of Pettibone Creek upstream of Navy property. Has a right-of-entry been obtained for access to this property?
- 3) Section 8.1 - There is mention here of a 100-particle Wolman pebble count. There is no description included of how this is conducted, either in the text or the appendices. A short explanation should be provided.
- 4) Section 8.1 - It states under Investigation-Derived Waste Management that "Discarded alcohol used for sample preservative will be diluted and discarded". In what manner will it be discarded? It should be containerized, sampled, and disposed of in accordance with the appropriate regulations. Please provide the specifics of how the discarded alcohol will be disposed.
- 5) Section 8.1 - It is noted on page 40 that the analytical "laboratory SOPs are not included in this SAP, but have been reviewed to make sure they are suitable for use on this project." Illinois EPA has no way of verifying that statement. However, the generated data will ultimately reveal whether those procedures were acceptable or not. Therefore, the Agency will withhold judgment until the data has been collected, validated, and submitted for review.
- 6) Section 9.0 - The Project Screening Levels listed in the table in this section are consistent with the values used for screening in the original remedial investigation for this site. However, that investigation was conducted roughly 10 years ago. A thorough review of the listed values to confirm that they remain current could not be completed in the time allotted. Therefore, the Agency reserves the right to request revisions to these values once a more complete review has been conducted. (This may occur as part of the draft report review.)
- 7) Health and Safety Plan - There are several instances (e.g. Sections 2.5 and 2.7) where a sentence or several sentences are repeated in succession. The Navy should delete the duplicate lines.
- 8) General Comment - The submitted plan is stated to be a Uniform Federal Policy (UFP) - Sampling and Analysis Plan (SAP). A UFP-SAP incorporates informational inputs on 37 numbered worksheets. The submitted plan doesn't really provide worksheets. It provides references to the associated worksheets, which is a deviation from the guidance as written. It is noted that the majority of the specified information has been provided, but not all. The Navy should ensure that all of the necessary information has been included and the proper references added, if not following the guidance strictly.

Respectfully,

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

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))