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NSTC GREAT LAKES  
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LETTER AND COMMENTS FROM ILLINOIS DEPARTMENT OF NATURAL RESOURCES  
REGARDING DRAFT SAMPLING AND ANALYSIS PLAN SITE 17 PETTIBONE CREEK FOR  
BENTHIC AND SEDIMENT SAMPLING NSTC GREAT LAKES IL  
3/16/2012  
ILLINOIS DEPARTMENT OF NATURAL RESOURCES

**Archived:** Thursday, July 19, 2012 10:01:49 AM  
**From:** Whetsell, Beth  
**Sent:** Friday, March 16, 2012 9:35:58 AM  
**To:** Simes, Benjamin W CIV NAVFAC MW, EV  
**Cc:** Conrath, Brian A.; Davis, Robert  
**Subject:** RE: NSGL Draft Site 17 Tier II SAP  
**Response requested:** Yes  
**Importance:** Normal

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Benjamin,

IDNR provides the following comments on the **Draft UFP Sampling and Analysis Plan, Site 17 – Pettibone Creek – Benthic and Sediment Sampling, Naval Station Great Lakes, Great Lakes, IL.**, dated March 7, 2012:

1. Although March is not the optimal time to sample benthic invertebrates for multiple reasons, as long as reference streams are sampled at the same time, IDNR has less issue with the proposed March sampling date.
2. The comparison between reference data and Navy property data would have more statistical power if the same number of samples were collected from reference locations that are being collected from Navy property locations.
3. The Navy continues to ignore the IDNR Consultation recommendation to include the mudpuppy as a species of concern in Pettibone Creek.
4. Limiting the sediment investigation to the top 4 cm of sediment has the potential to overlook contaminated sediments below 4 cm. IDNR's understanding is that if the top 4 cm are deemed "clean," then no sediments will be removed, when in fact, sediments below 4 cm (**or 1 ½ inches**) may be contaminated.
5. On page 30 the sampling reaches are summarized as follows: "At this time, 13 reaches are targeted for sampling to adequately characterize Pettibone Creek (see Figure 7-1). Nine of these reaches represent the site and will be located along the preferential pathway of the North Branch of Pettibone Creek, while four are reference areas, located in the South Branch of Pettibone Creek....Each of the sample locations (NTC17PCSD53, NTC17PCSD54, NTC17PCSD58 through NTC17PCSD68) will consist of samples collected along a 300 foot long creek reach....Although the western fork of the South Branch of Pettibone Creek receives more urban runoff than does the southern fork, one reference sample (NTC17PCSD69) will be collected from this area as the stream is not influenced by potential Navy sources." With the inclusion of the South Western reference site – NTC17PCSD69, there is a total of 14 reaches (9 test sites and 5 reference sites). This SW reference site should also be included with the

summary: NTC17PCSD58 through NTC17PCSD69.

Please let me know if you have questions or concerns.

Beth

Office of Realty and Environmental Planning

Illinois Department of Natural Resources

One Natural Resources Way

Springfield, IL 62702

Ph: 217.557.7816

Fax: 217.524.4177

**From:** Conrath, Brian A.

**Sent:** Thursday, March 15, 2012 7:30 AM

**To:** Whetsell, Beth

**Subject:** RE: NSGL Draft Site 17 Tier II SAP

Good morning Beth.

It would be best if you would send them to Ben and copy Bob and me. Thanks.

Brian

**From:** Whetsell, Beth

**Sent:** Wednesday, March 14, 2012 3:50 PM

**To:** Conrath, Brian A.

**Subject:** RE: NSGL Draft Site 17 Tier II SAP

Brian,

Unfortunately, I don't think I will have comments to you by COB today. I am close, but just don't quite have them altogether. Should I send comments to Robert Davis or Ben Simes?

Beth

**From:** Conrath, Brian A.  
**Sent:** Wednesday, March 07, 2012 2:35 PM  
**To:** Whetsell, Beth  
**Subject:** NSGL Draft Site 17 Tier II SAP

Beth,

Good afternoon. The Navy would like to deploy the sediment trap samplers in the creek as soon as possible to allow sufficient time to collect those samples. Therefore, they are requesting we take a look at the portions of the SAP related to that in the very near future and provide our comments or approval in advance of our full comments. It is a fairly short section or two for review, so it shouldn't take much time to complete. If you could complete this task by say the middle of next week, that would be great. I am scheduled to be out of the office between the 15<sup>th</sup> and the 26<sup>th</sup>, so if your response cannot be completed before then, you will need to send them directly to the Navy and just copy me.

As noted in Bob's e-mail, they want to get started by the end of March, so our reviews will have to be pretty quick anyway. I'm not sure we can finish up that quickly, but I guess we will need to give it a shot.

Thanks for your help with this. If you have any questions, please give me a call at 217-557-8155.

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))