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NSTC GREAT LAKES
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LETTER AND NO FURTHER COMMENTS FROM ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY REGARDING FEASIBILITY STUDY SITE 19 NSTC GREAT LAKES IL
7/9/2012
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Davis, Robert

From: Conrath, Brian A. <Brian.Conrath@Illinois.gov>
Sent: Monday, July 09, 2012 12:23 PM
To: Van Donsel, Terese A CIV NAVFAC MW, IPT
Cc: Davis, Robert
Subject: RE: Site 19 FFS

Terese,

I'm back from vacation now and have found that we will not have any additional comments on the FS. My comment letter should go out later today, pretty much unchanged from what I sent previously. Therefore, I am not sending an electronic copy at this time.

Let me know if you need anything else.

Respectfully,

Brian A. Conrath
Illinois EPA

---Original Message ---

From: Van Donsel, Terese A CIV NAVFAC MW, IPT (<mailto:terese.vandonsel@navv.mil>)
Sent: Wednesday, June 27, 2012 7:13 PM
To: Conrath, Brian A.
Subject: Site 19 FFS

Brian,

Just checking to see if you are going to have any additional comments on the FFS. We're trying to wrap things up on the site and get in any final changes.

As you probably know from Tetra Tech calls over to Les, we're still trying to figure out why there seems to be such a disconnect on manganese when it comes to construction worker risk. The risk assessment is showing a HI of 5, I think, but we're under the TACO construction worker criteria. Seems strange. We need to resolve this so we know whether any LUCs would need to address this pathway.

Your thoughts would be appreciated.

Thanks.

V/r,
Terese
(in beautiful hot, sticky, and mosquito-y Puerto Rico)
Mobile: 847-830-1385

Davis, Robert

From: Conrath, Brian A. <Brian.Conrath@Illinois.gov>
Sent: Thursday, June 07, 2012 3:26 PM
To: Van Donsel, Terese A CIV NAVFAC MW, IPT
Cc: Davis, Robert
Subject: RE: Site 19 FFS Draft Comments

Terese,

You are correct. What I meant to say was they should be included on the ARAR Tables and listed as TBCs. I neglected to complete that train of thought. I did say those comments were in draft form, didn't I? That comment will be corrected before the formal comment letter goes out. Let me know if you find any more of my mistakes. Thanks.

Respectfully,

Brian A. Conrath
Illinois EPA

---Original Message---

From: Van Donsel, Terese A CIV NAVFAC MW, IPT [<mailto:terese.vandonsel@navv.min>]
Sent: Thursday, June 07, 2012 2:11 PM
To: Conrath, Brian A.
Cc: Davis, Robert
Subject: RE: Site 19 FFS Draft Comments

Brian,

Just a quick follow up on the comments that you provided yesterday. For comment #2, you are requesting that generic soil screening levels and region 9 PRGs be included as chemical-specific ARARs. While these documents do reference chemical-specific concentrations, they should not be considered chemical-specific ARARs. Rather, they would be to-be-considered (TBC) guidelines that can be used to screen chemical concentrations that pose potential threats to human health.

If screening levels were to be included as chemical-specific ARARs and all selected remedies need to meet ARARs, any screening criteria included as a chemical-specific ARARs would need to be met and would therefore become cleanup criteria. In addition, the screening criteria certainly shouldn't be more important than the state's TACO criteria, which are also TBCs.

Please let me know if this makes sense or if you disagree with my thought process.

Thanks.

V/r,
Terese

---Original Message---

From: Conrath, Brian A. [<mailto:Brian.Conrath@Illinois.gov>]
Sent: Thursday, June 07, 2012 8:58
To: Van Donsel, Terese A CIV NAVFAC MW, IPT; Davis, Robert

Subject: Site 19 FFS Draft Comments

Terese,

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 is conducting a review of this submittal and is herein (attached) providing the comments generated thus far in order that the Navy may begin working on their responses. Please note: These comments are still in draft form and may be revised prior to issuance of our final comment letter. In addition, since the document is still under review there will likely be additional comments provided at a later date.

If you have any questions regarding any of the attached comments or would like to discuss them, please give me a call at 217-557-8155 or you may contact me via electronic mail at brian.conrath@illinois.gov.

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))

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 Federal Chemical-Specific ARARs 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:
 - 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?