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NSTC GREAT LAKES
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LETTER AND U S NAVY RESPONSE TO ILLINOIS DEPARTMENT OF NATURAL
RESOURCES COMMENTS TO DRAFT TIER II SAMPLING AND ANALYSIS PLAN SITE 17
NSTC GREAT LAKES IL
3/22/2012
U S NAVY

**RESPONSE TO COMMENTS
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY COMMENTS
MARCH 13, 2012
DRAFT SITE 17 TIER II SAMPLING AND ANALYSIS PLAN
NAVAL STATION GREAT LAKES**

- 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.

Response: *The text will be corrected to indicate the bluffs are 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?

Response: *The sediment samples upstream will be collected from public property and entry to Pettibone Creek will be obtained from the Illinois DOT exit ramp from the Amstutz Expressway.*

- 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.

Response: *After the statement “In addition to collecting the benthic samples, the field crew will make field observations related to stream habitat conditions and will conduct a visual-based physical habitat assessment and a modified 100-particle Wolman pebble count at each sample location.”, the following text will be added to Section 8.1: “The modified 100-particle Wolman pebble count will be conducted by dividing the sampling location into 10 transects based upon the percentage of features present within the stream reach (e.g., pools, riffles). Ten particles will be measured in each transect using calipers to determine the size class.”*

- 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.

Response: *The sentence will be modified as follows: Ethanol used for sample preservative will be decanted from the samples and stored in a 5 gallon bucket with a screw on lid. The bucket and material safety data sheet (MSDS) for ethanol will be provided to NSGL for proper disposal.*

- 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.

Response: *Comment noted. The criteria provided in the Sampling and Analysis Plan are primarily to guide analytical method selection and current criteria will be used for decision making. The laboratory SOPs are not included in the Tier II SAPs as part of the Navy’s streamlined SAP approach (see the response to Comment 8 below). As part of the streamlining the Navy recognized that the laboratories that are being utilized were accredited in the U.S. Department of Defense Environmental Laboratory Accreditation Program (DoD ELAP) as detailed in the DoD Quality Systems Manual for Environmental Laboratories (DoD QSM v4.1) based on the*

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National Environmental Laboratory Accreditation Conference Chapter 5 Quality Systems Standard (NELAC Voted Revision June 5, 2003) and for Naval Station Great Lakes in the State of Illinois Environmental Protection Agency Environmental Laboratory Accreditation Program (NELAP) for drinking water, wastewater, and hazardous waste analysis.

- 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.)

Response: Comment noted.

- 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.

Response: The duplicate sentences will be deleted.

- 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.

Response: The Navy has streamlined their UFP-SAP approach by revising the 37-worksheet UFP-SAP to remove redundant information. The 12 worksheets submitted to Illinois EPA is the result of that streamlining and contains all the necessary information to complete the work. The text referenced above will be revised to state that "the SAP contains all necessary information to complete the project and is a streamlined approach based on the standard worksheets as specified in the Uniform Federal Policy (UFP) QAPP guidance documents (USEPA, 2005). References to the UFP-QAPP manual will be removed from the beginning of each section. The Tier II SAP is the preferred format based on Navy guidance. The SAP has been reviewed and the necessary information for the project is included.