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LETTER AND ILLINOIS ENVIRONMENTAL PROTECTION AGENCY RESPONSE TO
COMMENTS TO DRAFT REMEDIAL INVESTIGATION REPORT FOR SITE 9 CAMP
MOFFETT RAVINE FILL AREA NS GREAT LAKES IL
9/21/2012
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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September 21, 2012

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

Re: Draft Remedial Investigation Report for
the Site 9 – Camp Moffett Disposal Area
Naval Station Great Lakes
Great Lakes, Illinois

0971255048 – Lake
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 responses to Agency comments regarding the Revised Draft Remedial Investigation Report for the Site 9 – Camp Moffett Disposal Area, Naval Station Great Lakes, Great Lakes, Illinois. They were submitted via electronic mail and were received August 07, 2012. Accompanying those responses was a redline-strikeout version of the revised Remedial Investigation Report. The Remedial Investigation Report presents the results of the September and November 2009 environmental investigation of Site 9 and the subsequent human health risk assessment for the site. The Agency has conducted a review of the Navy's responses and has the following additional comments to provide.

- 1) **Response to Comment Nos. 1-2** – Response acceptable.
- 2) **Response to Comment No. 3** – The response answers the question, but does not revise the text to include the explanation. That discussion should be included in the report. In addition, a lot of text has now been removed from the Executive Summary. Please explain its removal.
- 3) **Response to Comment Nos. 4-11** – Response acceptable.
- 4) **Response to Comment No. 12** – The response is noted. However, discussion, such as what was provided, should still be added to the report for clarity.
- 5) **Response to Comment Nos. 13-21** – Response acceptable.

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- 6) **Response to Comment No. 22** – See previous responses regarding the Executive Summary above.
- 7) **Response to Comment No. 23** – Response acceptable.
- 8) **Response to Comment No. 24** – While the added language is helpful, the Agency does not agree that it is probable the subsurface soil PAHs at the site are attributed to background. The concentrations may be approximately the same, but that in and of itself does not justify attributing it to background.
- 9) **Response to Comment No. 25** – Response noted. The recommendation to perform a Feasibility Study for the soil media will be appropriate once the RI is complete. However, as there are also unacceptable risks from exposure to groundwater, the recommendation should be to conduct a Feasibility Study to address both soil and groundwater.
- 10) **Response to Comment No. 26** – Response acceptable provided the necessary changes are made.
- 11) **Response to Comment Nos. 27-31** – Response acceptable.
- 12) **Response to Comment No. 32** – Response is unacceptable. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) does not provide an exemption for stopping a remedial investigation due to a change in property ownership or the addition/inclusion of another responsible party. In fact, it does quite the opposite. The Navy is the lead Agency at this site. According to the National Oil and Hazardous Substance Pollution Contingency Plan, the implementing regulation of CERCLA, in Section 300.430(d)(2) “The Lead Agency shall characterize the nature of and threat posed by the hazardous substances and hazardous materials and gather data necessary to assess the extent to which the release poses a threat to human health or the environment”. Illinois EPA is not being unreasonable in its expectation that the Navy “conduct additional investigation of areas that are off-site of the Navy property and related to property that was not owned by the Navy”. The former ravines, which are the subject of this investigation and where the contaminated media have been found, are all connected, are continuous, and are considered one site. The nature *and extent* of the identified contamination must be properly delineated before a proper risk assessment can be conducted and the appropriate remedy determined.
- 13) **Response to Comment No. 33** – Response noted. Illinois EPA suggests a comprehensive discussion similar to the response be added to the report to address the surface soil conditions.
- 14) **General Comment** – The Agency inadvertently omitted one comment in our original letter that will need to be addressed. In Table 6-10, there were several errors noted in the non-cancer inhalation toxicity values. These should be corrected.

- Vanadium: Change chronic reference concentration (RfC) to 0.0001 mg/m³, ATSDR.
- Vanadium: Conversion to an inhalation RfD is improper.
- Naphthalene: Add subchronic RfC (RfCs) of 0.003 mg/m³, chronic value.
- TCDD: Add RfCs of 4.0E-08 mg/m³, chronic value.
- Tetrachloroethylene: Add RfCs of 0.27 mg/m³, ATSDR.
- Aluminum: Add RfCs of 0.005 mg/m³, chronic value.
- Arsenic: Add RfCs of 0.000015 mg/m³, chronic value.
- Cadmium: Add RfCs of 0.00001 mg/m³, chronic value.
- Chromium VI: Add RfCs of 0.0003 mg/m³, ATSDR.
- Cobalt: Add RfCs of 0.00002 mg/m³, PPRTV.
- Manganese: Add RfCs of 0.00005 mg/m³, chronic value.
- Mercury: Add RfCs of 0.00003 mg/m³, chronic value.
- Vanadium: Add RfCs of 0.0001 mg/m³, ATSDR.

- 15) **General Comment** – In this revision of the report the Navy has changed the name of the site and has been very careful in reporting what has historically been found in the filled areas of the site to justify that change. While there is nothing wrong with being accurate and concise, it appears that some of the data that has been reported previously has been redacted and some of the initial assumptions ignored. The Agency is concerned that by only reporting what has been confirmed by way of this investigation, the Navy may be misrepresenting the data. The current investigation was scoped and conducted with certain information accepted as fact without further investigation. One example of this was that there was galley waste (stainless steel serving trays and food waste) in addition to the fly ash, coal, brick fragments, cinder, and glass disposed in the ravines. Now, some of that data is being revised, apparently based upon observations of the soil borings alone. That is inconsistent with the original premise and would change the assumptions agreed upon at the outset. The report now references an “unknown material from an unknown source” and states that “investigation of the site has showed no evidence of a disposal area”, as well as, “the Navy did not observe any physical waste.” Please explain how the documented waste at this site became an “unknown material” and provide the Navy’s definition of physical waste. The Navy already acknowledged that the fill material contained waste, before this investigation began. The Illinois Environmental Protection Act defines waste as “any garbage, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility or other discarded material, including solid, liquid, semi-solid, or contained gaseous material resulting from industrial, commercial, mining and agricultural operations, and from community activities...” The materials mentioned above are wastes. In addition, since they have been managed and disposed of, the site now constitutes a waste disposal site.

Had this investigation been scoped with the intent of disproving the notion that waste had been placed in the ravines, rather than quantifying contaminant levels and risk, the investigation would have included the digging of numerous test pits to see firsthand the nature of the fill material. If the Navy now wants to claim that there is no waste in the ravines, the Agency must insist on a more rigorous investigation (installation of test pits) to determine

what materials have been placed in the ravines. It should also be noted that the majority of the soil borings were installed via direct push. Collection of soil samples in this manner does not lend itself to bringing waste material or large objects to the surface. Therefore, some of the types of waste said to be in the ravines would likely not be observed during this type of sampling activities.

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 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)