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LETTER AND COMMENTS FROM ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
REGARDING PROPOSED PLAN FOR SITE 19 SMALL ARMS RANGE 910 NSTC GREAT  
LAKES IL  
10/29/2012  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

JOHN J. KIM, INTERIM DIRECTOR

(217) 557-8155  
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October 29, 2012

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

Re: Proposed Plan for Site 19  
Small Arms Range 910  
Naval Station Great Lakes  
Great Lakes, Illinois

0971255048 – Lake County  
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 *Proposed Plan for Site 19 – Small Arms Range 910, Naval Station Great Lakes, Great Lakes, Illinois*. It was received at the Agency on September 26, 2012. The Proposed Plan is being presented to satisfy the statutory and regulatory requirements for public participation under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and its primary intent is to help the public understand and provide input on the proposed remedial alternatives to address impacted surface and subsurface soil at Site 19.

Illinois EPA has completed our review of the Proposed Plan and is providing the following comments.

- 1) **First Page** – Please remove the Illinois EPA logo from the top of this page. The State is not a co-author for this document nor are we a signatory. Therefore inclusion of our logo is inappropriate.
- 2) **First Page** – The front page of the Proposed Plan should be designed to attract the attention of the reader. It should high-light the proposed remedy and encourage the reader to submit comments. Its purpose should be evident at a glance without having to read halfway down the page. In addition, the dates for public comment should be readily accessible.
- 3) **First Page** – On this page and throughout the Proposed Plan, there is no need to direct the reader to the following page or from the previous page every time the text is continued on a

subsequent page. This need only occur in instances where the text does not continue on the following page.

- 4) **About This Document** – Here and throughout the submittal, the actual dates for the public comment period and the other relevant dates will need to be provided once they have been determined.
- 5) **The Proposed Plan** – The last sentence in the box is missing at least the last word. The sentence should conclude “...in the foreseeable *future*.”
- 6) **Site Description** – In the second sentence it states that 19 million pounds of ammunition were generated by this facility. Suggest rewording this to state that 19 million pounds of *spent* ammunition were generated by this facility.
- 7) **Site Description** – The nature and extent of the contamination should be identified here, including the horizontal and vertical extent of the contaminated area.
- 8) **Site Description** – In the third paragraph, the last sentence states that “exceedances remained below soil screening criteria.” Suggest rewording to state that *detections* remained below soil screening criteria.
- 9) **How are Human Health Risks Evaluated?** – The last line under Step 2 requires revision. Suggest it be revised to read ...which represent the highest level and average level of human exposure.
- 10) **Summary of Site History** – This section should discuss any public participation activities initiated prior to issuance of the Proposed Plan, if any.
- 11) **Site 19 Remedial Action Alternatives** – Suggest moving the paragraph preceding Alternative 3 to the end of this section. The remedial action alternatives should all be presented before discussing the Record of Decision and the recommended alternative.
- 12) **Site 19 Remedial Action Alternatives** – For Alternative 3, the approximate volume of soil to be removed should be provided. The estimated time to complete the removal should also be given.
- 13) **Table 2** – The last sentence in the write-up for Alternative 3 for Short-Term Effectiveness is incomplete.
- 14) **Why Does the Navy Recommend This Proposed Alternative?** – In the last paragraph, the Navy recommends “that the ROD provide the Navy with the flexibility to implement Alternative 3 at its discretion if sufficient funding is available.” While we understand what the Navy is proposing to do and agree it would be beneficial to the Navy to have that flexibility

built in to the ROD, we cannot agree to the use of what would be a contingency alternative based solely upon funding.

There is another way to address this issue. This situation has been similarly dealt with in the past by tying the contingency alternative, the removal, to the five-year review. The Navy would state in the ROD that at the first five-year review the remedy be re-evaluated and a determination made at that point as to its effectiveness and current Navy need/use for the subject property. (Or something similar) The Navy could then identify a need for the property and invoke the contingency remedy allowing the removal to be conducted and the site to be clean closed. In doing so, the Navy would accomplish the same goal without requiring a ROD amendment.

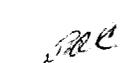
If you have any questions regarding anything in this letter or require any additional information, please contact me at (217) 557-8155 or via electronic mail at [brian.conrath@illinois.gov](mailto:brian.conrath@illinois.gov).

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)