

N00210.AR.000569
NSTC GREAT LAKES
5090.3a

TRANSMITTAL LETTER AND U S NAVY RESPONSES TO REGULATOR COMMENTS TO
FOCUSED FEASIBILITY STUDY FOR SITE 19 SMALL ARMS RANGE 910 NSTC GREAT
LAKES IL
11/15/2012
TETRA TECH



TETRA TECH

PITT-11-12-032

November 15, 2012

Project 112G00936/112G03628

Dept of the Navy
Naval Station Great Lakes
NAVFAC MW Code EV
Attn: Terese Van Donsel
201 Decatur Ave.
Building 1A
Great Lakes, IL 60088

Reference: CLEAN Contract No. N62467-04-D-0055/N62470-08-D-1001
Contract Task Order 468/F27S

Subject: Final Focused Feasibility Study
Site 19 – Small Arms Range 910
Naval Station Great Lakes
Great Lakes, Illinois

Dear Ms. Van Donsel:

Please find attached two paper copies and two compact discs of the subject report. Copies the final Focused Feasibility Study have also been distributed as indicated below.

Also attached is one copy of the responses to Illinois Environmental Protection Agency comments. If you have any questions, please call me at 412-921-7251.

Sincerely,

Robert F. Davis, P.E.
Project Manager

RFD/clm

Enclosure

cc: H. Hickey, NAVFAC Midwest (1 copy with 1 CD and 1 RTC)
O. Thompson, USEPA Region 5 (2 copies with 2 CDs and 1 RTC)
B. Conrath, Illinois EPA (3 copies and 3 CDs and 1 RTC)
G. Wagner (Admin Record), TtNUS (1 copy and 1 CD and 1 RTC)
File CTO 468, Tetra Tech (1 copy with 1 CD and 1 RTC)
File CTO F27S, Tetra Tech (1 copy with 1 CD and 1 RTC)
J. Trepanowski, TtNUS (transmittal letter)

Tetra Tech

661 Andersen Drive, Pittsburgh, PA 15220-2700
Tel 412.921.7090 Fax 412.921.4040 www.tetrattech.com

**RESPONSES TO ILLINOIS EPA COMMENTS
RECEIVED JUNE 7, 2012 WITH FOLLOW UP ON JULY 9, 2012
DRAFT FOCUSED FEASIBILITY STUDY FOR THE
SITE 19 – SMALL ARMS RANGE 910
NAVAL STATION GREAT LAKES
GREAT LAKES, ILLINOIS**

- 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.

Response: The paragraph was revised to report the RME HI for the future construction worker was 5.0 and the CTE HI for the construction worker was 2 for both surface and subsurface soil using the USEPA PEF. Based on the conference call on August 9, 2012 the construction worker HI was recalculated using the Illinois EPA PEF and these results are also reported in this paragraph.

- 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

Response: The preference for the presentation of ARARs is to only include on the ARAR tables those criteria sets that are actually used for the selected PRGs. This prevents the accidental inclusion of criteria that are overly stringent in the ROD. The text and PRG table can be revised to include these other criteria along with an explanation as to why they are excluded. Also, the Region 9 values have been replaced by the RSLs. In any case, they are TBCs and the State TACO values have more weight.

- Generic Soil Screening Levels, U.S. EPA, most recent

Response: The Generic Soil Screening Levels have not been updated since 2002. The policy in EPA Regions 3, 4, 6, and 9 is to use the RSLs. Region 5 is silent on this issue. Like the Region 9 PRGs above, they can be discussed in the text and PRG selection table. In any case, they are TBCs and the State TACO values have more weight.

- 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

Response: These OSHA regulations (Hazardous waste operations and emergency response) are for occupational hazards, and are not environmental remediation or protection standards or siting laws. Therefore, these regulations are excluded from ARARs. Further, 40 CFR 300.150 Worker Safety requires

**RESPONSES TO ILLINOIS EPA COMMENTS
RECEIVED JUNE 7, 2012 WITH FOLLOW UP ON JULY 9, 2012
DRAFT FOCUSED FEASIBILITY STUDY FOR THE
SITE 19 – SMALL ARMS RANGE 910
NAVAL STATION GREAT LAKES
GREAT LAKES, ILLINOIS**

that “Response actions under the NCP will comply with the provisions for response action worker safety and health in 29 CFR 1910.120.” Thus, the subject regulation is already a requirement.

- Soil Conservation Act, U.S.C. 5901 et seq.

Response: The Soil Conservation Act is implemented at the state level, and often at the local level. In this case, the Illinois Urban Manual (2010) was included as a TBC to address erosion and sediment control. Therefore, the Federal Act will not be included.

- 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

Response: Because transport is an off-site activity, all of the requirements (substantive and administrative) must be met in any case. As such, this requirement was not included on the ARARs list.

- Illinois Environmental Protection Act, 415 Illinois Compiled Statute 5/1, Titles II, III, V, and VI

Response: The information in the Titles listed (Air Pollution, Water Pollution, Land Pollution and Refuse Disposal, and Noise) are very broad, primarily giving other agencies authority to create regulations, grant permits, and change fees. This law does not appear to provide any requirements that are useful in developing ARARs. Therefore, this law will not be included in the ARAR table unless there is a specific paragraph that can be used.

- 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.

Response: Chromium concentrations were below the TACO residential criteria for soil ingestion. This statement was removed from the FFS.

**RESPONSES TO ILLINOIS EPA COMMENTS
RECEIVED JUNE 7, 2012 WITH FOLLOW UP ON JULY 9, 2012
DRAFT FOCUSED FEASIBILITY STUDY FOR THE
SITE 19 – SMALL ARMS RANGE 910
NAVAL STATION GREAT LAKES
GREAT LAKES, ILLINOIS**

- 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.

Response: This statement was deleted from the FFS.

- 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?

Response: The inspections and land use controls differ based on assumptions between the sites. Annual inspections with reports for Site 22 were estimated using facility personal to complete the work. Site 19 differs because it uses a consultant to complete the task. The Five-Year Review cost of \$7,000 for Site 22 versus \$23,000 for Site 19 is based on updated information and additional details received from past work.

- 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?

Response: Based on risk assessment results, it was determined that lead concentrations were less than the level of concern for children, adults, and construction workers. Chromium concentrations were below the TACO residential minimum criteria value. The text will be changed accordingly. The manganese concentration below background was removed from the figure.

