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LETTER AND COMMENTS FROM ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ON  
PROPOSED PLAN SITE 17 PETTIBONE CREEK OPERABLE UNIT 1 (OU1) NSTC GREAT  
LAKES IL  
3/18/2013  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

JOHN J. KIM, DIRECTOR

(217) 557-8155  
(FAX) 782-3258

March 18, 2013

Engineering Field Activity, Midwest  
Attn: Mr. Ben Simes  
Building 1A, Code 931  
201 Decatur Avenue  
Great Lakes, Illinois 60088-5600

Re: Proposed Plan for Site 17 –  
Pettibone Creek (Operable Unit 1)  
Naval Station Great Lakes  
Great Lakes, Illinois

0971255048 – Lake  
Great Lakes Naval Station  
Superfund/Technical

Dear Mr. Simes:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's *Proposed Plan for Site 17 - Pettibone Creek (Operable Unit 1), Naval Station Great Lakes, Great Lakes, Illinois*. It was dated February 2013 and was received at the Agency in on March 04, 2013. The Proposed Plan (PP) is being presented to satisfy the statutory and regulatory requirements for public participation under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and to help the public understand and provide input on the proposed remedial alternative to address surface water and sediment in Site 17- Pettibone Creek. The Agency has reviewed the submittal and is providing the following comments.

- 1) **Introduction** – In the first paragraph, line 4, “Naval” is misspelled.
- 2) **Introduction** – This section should refer the reader to the Remedial Investigation and Feasibility Study Reports and to the Administrative Record file for more information.
- 3) **Figure 1** – This figure is rather small and difficult to read. Suggest it be enlarged to better show the entire site.
- 4) **Site Background** – Suggest providing a summary of the environmental history of Pettibone Creek similar to what was provided in the previous PP.

- 5) **Initial Investigations** – Suggest re-wording the last sentence to conclude “and metals were present on those sites.”
- 6) **Ecological Risks** – In discussing the three lines of evidence from the 2012 investigation, it concludes that “it is believed that benthic communities are affected more by habitat stressors than be sediment concentrations so any actions to address chemical concentrations in the sediment may not actually result in an improved benthic community.” Suggest adding a sentence stating that the physical act of remediating the site, e.g. conducting a removal, would likely further impact the ecological environment (creek bed), as well as the ravine sides, which are severely sloped and under continual erosive forces. Put simply, it would do more harm than good.
- 7) **Next Steps** – It should clearly state that the preferred alternative can change in response to public comment or upon receipt of new information. There should also be discussion, as was included in the previous PP, explaining the ability of the public to request an extension to the public comment period and how to make such a request.
- 8) **Glossary of Terms** – The definition of risk needs to include human health effects as well as ecological effects.

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)