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NSTC GREAT LAKES
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LETTER AND ILLINOIS ENVIRONMENTAL PROTECTION AGENCY RESPONSE TO U S
NAVY RESPONSE TO COMMENTS ON REMEDIAL INVESTIGATION/RISK ASSESSMENT
SITE 5 TRANSFORMER STORAGE BONEYARD NSTC GREAT LAKES IL
3/21/2013
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

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March 21, 2013

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

Re: Navy Responses to Comments on the
Remedial Investigation/Risk Assessment
for Site 5 – Transformer Storage Boneyard
Naval Station 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 Responses to Comments on the *Remedial Investigation/Risk Assessment Report for Site 5 – Transformer Storage Boneyard, Naval Station Great Lakes, Great Lakes, Illinois*. They were dated February 21, 2013 and were received at the Agency on February 28, 2013.

The Agency has reviewed the Navy's responses and is herein providing a few follow-up comments.

- 1) **Response to Comment Number 9** – The response justifies pathway screening procedures because they were included in the approved work plan. Since the impact to this assessment is negligible, the response will be considered acceptable. When reviewing work plans in the future, Illinois EPA will be watchful for the unacceptable procedure of eliminating pathway-specific intakes for a chemical when site concentrations fall below the pathway-specific screening concentration. Risks due to intakes from all pathways should be calculated and summed whenever a chemical exceeds *any* pathway-specific screening concentration.
- 2) **Response to Comment Number 13** – The response is acceptable. We trust that the omission of three input variables in the definitions for the VF and D_a equations is a typographical error and that they will appear in the final.
- 3) **Response to Comment Number 18** – The response appears to provide two example sentences for inclusion in the report. Neither is quite what the State had in mind. Suggest the

following be added: “The associated risks may be underestimated due to the exclusion of the soil to groundwater pathway. However, exposure to groundwater does not occur under current land use and is unlikely to in the future, although there is currently nothing in place to prevent the Navy from rescinding the base-wide restriction on groundwater use.

- 4) **Response to Comment Number 22** – The response is noted. The Agency would caution that direct observations need to be documented at the time of occurrence, rather than after the fact.

Although these additional comments are advisory in nature, the Agency cannot provide our concurrence with the document until the revised pages have been received and the specified revisions verified. Once that has been completed, Illinois EPA will then make a final determination regarding document acceptance.

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

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)