

N00210.AR.000576  
NSTC GREAT LAKES  
5090.3a

U S NAVY RESPONSES TO ILLINOIS EPA COMMENTS ON DRAFT PROPOSED PLAN FOR  
SITE 17 PETTIBONE CREEK OPERABLE UNIT 1 (OU1) NSTC GREAT LAKES IL

4/3/2013  
U S NAVY

**RESPONSES TO ILLINOIS EPA COMMENTS DATED MARCH 18, 2013  
DRAFT PROPOSED PLAN FOR  
SITE 17 – PETTIBONE CREEK (OPERABLE UNIT 1)  
NAVAL STATION GREAT LAKES  
GREAT LAKES, ILLINOIS  
ISSUED: APRIL 3, 2013**

**SPECIFIC COMMENTS**

1. **Comment:** Introduction - In the first paragraph, line 4, "Naval" is misspelled.  
**Response:** The referenced spelling error will be corrected.
  
2. **Comment:** Introduction - This section should refer the reader to the Remedial Investigation and Feasibility Study Reports and to the Administrative Record file for more information.  
**Response:** The following statement will be added to the first paragraph of the Introduction after the second sentence: "The results of the investigation of Site 17 – Pettibone Creek were presented in the Remediation Investigation/Risk Assessment (RI/RA) Report and Sediment Characterization Report. Additional information on investigation activities and results can be found in the Administrative Record (see section "For More Detailed Information" at the end of the Proposed Plan for details on accessing the Administrative record)." The Feasibility Study was not used to select the remedy; therefore, it will not be referenced in the Proposed Plan.
  
3. **Comment:** Figure 1 - This figure is rather small and difficult to read. Suggest it be enlarged to better show the entire site.  
**Response:** Figure 1 will be modified to present a larger and clearer image.
  
4. **Comment:** Site Background - Suggest providing a summary of the environmental history of Pettibone Creek similar to what was provided in the previous PP.  
**Response:** A table summarizing previous investigations will be included.
  
5. **Comment:** Initial Investigations - Suggest re-wording the last sentence to conclude "and metals were present on those sites."  
**Response:** The requested change will be made.
  
6. **Comment:** 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 by 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.  
**Response:** The following statement will be added to the end of the "Ecological Risks" section: "In addition, because of the existing physical site characteristics of the site, a removal action, such as dredging the sediment, would likely further impact the creek bed habitat, as well as the ravine sides, which are severely sloped and under continual erosive forces."
  
7. **Comment:** 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.

**RESPONSES TO ILLINOIS EPA COMMENTS DATED MARCH 18, 2013**  
**DRAFT PROPOSED PLAN FOR**  
**SITE 17 – PETTIBONE CREEK (OPERABLE UNIT 1)**  
**NAVAL STATION GREAT LAKES**  
**GREAT LAKES, ILLINOIS**  
**ISSUED: APRIL 3, 2013**

**Response:** The following statement will be added after the second sentence of the “Next Steps” section: “In response to public comments or upon receipt of new information, the preferred alternative for the site may change.” The following statement will be added to the end of the second paragraph under “Use This Space to Write Your Comments”: “A request for an extension to the public comment period (minimum of 30 days) must be made in writing. A request for a public meeting to present your formal comments must also be made in writing.”

8. **Comment:** Glossary of Terms - The definition of risk needs to include human health effects as well as ecological effects.

**Response:** The definition of risk will be modified as follows: “Likelihood that adverse human health effects or ecological effects are occurring or may occur as a result of exposure to one or more contaminants or stressors.”