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NSTC GREAT LAKES
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U S NAVY RESPONSES TO ILLINOIS EPA COMMENTS ON DRAFT FINAL PROPOSED
PLAN SITE 19 SMALL ARMS RANGE 910 NSTC GREAT LAKES IL
6/6/2013
TETRA TECH

**RESPONSES TO ILLINOIS EPA COMMENTS
RECEIVED NOVEMBER 13, 2012
DRAFT FINAL PROPOSED PLAN FOR
SITE 19 – SMALL ARMS RANGE 910
NAVAL STATION GREAT LAKES
GREAT LAKES, ILLINOIS**

- 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.

Response: This logo was removed.

- 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.

Response: A text box with contact information was added to the first page.

- 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.

Response: These were removed.

- 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.

Response: Dates will be added to the final as soon as they become available.

- 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*."

Response: This change was made.

- 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.

Response: The sentence was reworded as suggested.

- 7) **Site Description** – The nature and extent of the contamination should be identified here, including the horizontal and vertical extent of the contaminated area.

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Response: “Nature and Extent of Contamination” was added. The following was added in the middle of the first paragraph of Nature and Extent of Contamination: “PAHs did not appear to be confined to any particular area of the site.”

The following sentence was added to the end of the last paragraph of Nature and Extent of Contamination: “Figure 4 illustrates the horizontal extent of arsenic and manganese contamination and exceedances with respective depths.”

- 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.

Response: The sentence was reworded as suggested.

- 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.

Response: The sentence was reworded as suggested.

- 10) **Summary of Site History** – This section should discuss any public participation activities initiated prior to issuance of the Proposed Plan, if any.

Response: No public participation activities have been conducted. No change will be made based on this comment.

- 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.

Response: The first part of the first sentence of this paragraph relating to the ROD was deleted. The LUC RD information for this alternative remains.

- 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.

Response: This information was added to Alternative 3.

- 13) **Table 2** – The last sentence in the write-up for Alternative 3 for Short-Term Effectiveness is incomplete.

Response: This oversight was corrected.

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- 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.

Response: Based on discussions between the Navy, Tetra Tech, and Illinois EPA, the recommended alternative will be Alternative 2. The flexibility for the Navy to implement Alternative 3 will be deleted.