

N00210.AR.000615
NSTC GREAT LAKES
5090.3a

LETTER REGARDING ILLINOIS ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON RECORD OF DECISION FOR SITE 19 SMALL ARMS RANGE 910 NSTC GREAT LAKES

IL

8/6/2013

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

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

August 6, 2013

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

Re: Record of Decision for Site 19
Small Arms Range 910
Naval Station Great Lakes
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 *Record of Decision for Site 19 – Small Arms Range 910, Naval Station Great Lakes, Great Lakes, Illinois*. The Record of Decision (ROD) was dated July 2013 and was received on July 15, 2013. The ROD presents the selected final remedy for addressing surface soil and subsurface soil contamination at this site. The Sites 19 final remedy was selected by the Navy, as the lead agency, in consultation with the Illinois EPA, the support agency, in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, Title 42 United States Code Sections (t) 9601 et seq., and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 Code of Federal Regulations 300, et seq. The Agency has conducted a review of the submittal and has generated the following comments.

- 1) **Section 1.0 Declaration** – The Declaration should included a statement such as: “The response action selected in this Record of Decision is necessary to protect public health or welfare or the environment from actual or threatened releases of pollutants or contaminants from this site which may present an imminent and substantial endangerment to public health or welfare.”
- 2) **Section 1.3** – The identities for the Authorizing Signatures need to be determined and input here. For Illinois EPA, the current Director's signature line should be as follows:

Lisa Bonnett, Director, Illinois Environmental Protection Agency

- 3) **Section 2.3** – In the last full paragraph on page 7, the discussion of lead revolves around the 10 µg/DL value. Illinois EPA is considering revising its remediation objective for lead based upon the revised reference blood level of 5 µg/DL recently established by the Centers for Disease Control. Illinois EPA requests the Navy run the Integrated Exposure Uptake Biokinetic Model using this lower value and report that result here as well.
- 4) **Section 2.9.2** – In the third bullet item which discusses Illinois EPA’s UECA, it should state that an environmental covenant will be *required* to be placed on the property, unless the site no longer contains hazardous substances in soil at levels that do not allow for unrestricted use and unlimited exposure. This should also be mentioned in the paragraph following the bullet list.
- 5) **Section 2.9.4** – The fifth bullet states that neither LUCs nor Excavation and Disposal result in short-term risks. However, in Section 2.8.2 it states that Alternative 3 has the potential to result in short-term risks to workers, the community, and the environment. Please review and revise as necessary.
- 6) **List of Acronyms and Abbreviations** – The use of capital letters in the definitions is inconsistent. Please review and revise as necessary.
- 7) **General Comment** – Illinois EPA requests the Navy review the Land Use Control Memorandum of Agreement (LUCMOA) with Illinois EPA to ensure that it is up to date. In particular, the LUCMOA should include language requiring the use of an environmental covenant in accordance with Illinois EPA’s UECA, should Navy property with land use controls be transferred in the future.

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
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

BAC: \\fac:H\GLNTC\Site 19\Site19RODrvw.docx

cc: Bob Davis, Tetra Tech NUS, Inc.

Owen Thompson, USEPA (SR-6J)