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NSTC GREAT LAKES
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U S NAVY RESPONSES TO ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON DRAFT SAMPLING AND ANALYSIS PLAN ADDENDUM JUNE 2013 PHASE
3 REMEDIAL INVESTIGATION FOR SITE 12 HARBOR DREDGE SPOIL AREA NSTC GREAT
LAKES IL
7/19/2013
NAVFAC MIDWEST

**Responses to Illinois EPA's July 3, 2013 Technical Review Comments
Draft Sampling and Analysis Plan Addendum (June 2013)
Phase 3 Remedial Investigation for Site 12 Harbor Dredge Spoil Area
Naval Station Great Lakes, Great Lakes, Illinois**

Date Issued: July 19, 2013

- 1. Worksheet No. 2:** The scoping Session is listed as occurring on March 20, 2013. That call was conducted on Thursday March 21, 2013. This will need changed throughout the SAP.

Response: Agree. The date was corrected throughout the Sampling and Analysis Plan.

- 2. Worksheets No. 9 and 11, and elsewhere:** Under Project Action Limits, the results should be compared to 35 Illinois Administrative Code (IAC) 620.420, the groundwater standards rather than what was listed here. These regulatory values are enforceable and have the added weight of being an ARAR.

Response: Agree. The Project Action Limits were changed to reflect 35 IAC 620.420 throughout the Sampling and Analysis Plan.

- 3. Worksheet No. 15:** The matrix groundwater table contains several errors.
- The PAL reference should be corrected to the Illinois groundwater standards
 - The Class II standard for Nickel should be corrected to 2000 ug/L.
 - The Class II standard for Thallium should be corrected to 20 ug/L.
 - The class II standard for Silver should be nondetected. Use of the class I standard is acceptable; however, this should be explained in a footnote.
 - The PAL concentrations for Calcium, Magnesium, Potassium, and Sodium should be combined and defined as Class II standard for Total Dissolved Solids (1200 mg/L).

Response: Agree. The PAL reference has been changed to 35 IAC 620.420 Groundwater Quality Standards for Class II: General Resource Groundwater. The values for Nickel, Thallium, and Silver have been revised to 2000 ug/L, 20 ug/L, and nondetected, respectively.

Disagree. The PAL concentrations for Calcium, Magnesium, Potassium, and Sodium will not be revised as requested as this approach is not applicable to meet the data quality objectives for the project. Total Dissolved Solids is not a concern for the project.

- 4. Worksheet No. 15:** The Matrix: IDW entry for Heptachlor and Heptachlor Epoxide should be combined. The maximum regulatory level for Heptachlor included any concentrations of Heptachlor Epoxide.

Response: Disagree. The values will not be combined as requested because the base has historically looked at these values separately for RCRA waste characterization and disposal purposes. Investigation-derived waste, not groundwater samples, will be sampled and analyzed for heptachlor and heptachlor epoxide. No change is required.

- 5. Worksheet No. 15:** The Note: for "1" should be corrected to reflect use of the 35 IAC 620.420 regulations. Many of the PAL columns include the footnote "5". This should be added to the Notes section or removed from the column headers.

Response: Agree. The footnote "5" was removed from column headers.