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NSTC GREAT LAKES
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LETTER REGARDING ILLINOIS ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON DRAFT PROPOSED PLAN FOR SITE 5 FORMER TRANSFORMER STORAGE
BONEYARD, SITE 9 CAMP MOFFETT RAVINE FILL AREA AND SITE 21 BUILDINGS
1517/1506 AREA NSTC GREAT LAKES IL
11/26/2013
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

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November 26, 2013

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

Re: Draft Proposed Plan for Site 5 - Transformer
Storage Boneyard, Site 9 – Camp Moffett Ravine
Fill Area, and Site 21 – Buildings 1517/1506 Area
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 *Draft Proposed Plan for Site 5 – Transformer Storage Boneyard, Site 9 – Camp Moffett Ravine Fill Area, and Site 21 – Buildings 1517/1506 Area, Naval Station Great Lakes, Great Lakes, Illinois*. It was received via electronic mail on November 14, 2013 with hard copies to follow. The Proposed Plan is presented to satisfy the statutory and regulatory requirements for public participation under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Its primary intent is to help the public understand and provide input on the proposed cleanup alternatives to address impacted surface soil, subsurface soil, and/or groundwater at Site 5 - Transformer Storage Boneyard, Site 9 - Camp Moffett Ravine Fill Area, and Site 21 - Buildings 1517/1506 Area at Naval Station Great Lakes. All three sites are addressed in one document because of their proximity to each other and their similar geology, hydrogeology, and contaminated media.

Illinois EPA has completed our review of the Proposed Plan and is providing the following comments.

- 1) **Cover 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. It should state that public review and comment is requested on all of the remedial alternatives. The dates of the public comment period should be readily apparent. It should also point out on this page that the final remedy has not yet been determined and that new information or arguments provided to the Navy could

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result in the selection of a final remedial alternative that differs from the listed Preferred Alternative.

- 2) **Page 8, Summary of Risks** – This section provides the calculated cancer and non-cancer site risks and identifies the potential receptors, but does not discuss the exposure pathways by which those receptors may come into contact with the contaminated media. This information should be provided. This comment also applies to this same section on pages 14 and 22.
- 3) **Summary of Site Risks** – For all three sites, this section needs to include the following standard concluding statement that supports the need for taking action.

“It is the lead Agency’s current judgment that the Preferred Alternative identified in this Proposed Plan, or one of the other active measures considered in the Proposed Plan, is necessary to protect public health or welfare or the environment from actual or threatened releases of hazardous substances into the environment.”

- 4) **Remedial Action Objectives** – For all three sites, another remedial action objective should be to comply with Federal and State ARARs. In addition, there is little specific discussion of ARARs in this Proposed Plan. While it may not be necessary to provide a complete list of ARARs, there should at least be mention that they were determined and are presented in the Focused Feasibility Study and a statement included that each alternative was evaluated to determine its compliance with those ARARs.
- 5) **Remedial Action Alternatives** – For all three sites, this section needs to provide the estimated quantities of the contaminated material to be addressed by each alternative.
- 6) **Table 2** – It should be footnoted below this table that for arsenic, the Illinois EPA Class I Groundwater Standard takes precedence over the Illinois EPA Class I TACO standard.
- 7) **Page 10, Why Does the Navy Recommend This Preferred Alternative?** – Following the first bullet, it should state that “This alternative would effectively prevent exposure to surface and subsurface soil and groundwater contamination by *maintaining an engineered barrier and controlling uses of* and activities at the property.”
- 8) **Page 10, Why Does the Navy Recommend This Preferred Alternative?** – For all three sites, following the fourth bullet it should read “Five-Year Reviews would be conducted to make sure the engineered barriers and the LUCs are in place and maintained for continued protection of human health and the environment.”
- 9) **Page 17, Why Does the Navy Recommend This Preferred Alternative?** – For all three sites, this section should state that “This alternative would effectively prevent exposure to subsurface soil and groundwater contamination by *maintaining an engineered barrier and controlling uses of* and activities at the property.”

- 10) **Page 23, Why Does the Navy Recommend This Preferred Alternative?** – Following the first bullet it should state that “This alternative would effectively prevent exposure to surface and subsurface soil and groundwater contamination by *maintaining an engineered barrier and* controlling uses *of* and activities at the property.”
- 11) **Glossary of Terms** – The definition for Remedial Investigation describes it as a report, rather than the mechanism for data collection to characterize site conditions and determine the nature and extent of contamination. Suggest either revising the definition or changing the term to Remedial Investigation Report.
- 12) **Glossary of Terms** – The definition for Remedial Action Objective provided here should match that provided on page 5, which read “The RAOs are medium-specific goals that define the objectives of conducting cleanups to protect receptors that are at risk from contaminated media.”
- 13) **Glossary of Terms** – The acronyms IAS, VS, UST, RCRA, and CSM should also be included and defined here. In addition, the last few acronyms are not listed in alphabetical order.

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.

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)