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NSTC GREAT LAKES
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LETTER REGARDING ILLINOIS ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE REMEDIAL ACTION COMPLETION REPORT FOR SITE 2 FORRESTAL LANDFILL
NSTC GREAT LAKES IL
7/7/2009
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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July 7, 2009

Engineering Field Activity, Midwest

Attn: Mr. Bill Busko
Building 1A, Code 931
201 Decatur Avenue
Great Lakes, Illinois 60088-5600

Re: LPC # 0971255048 -- Lake County
Great Lakes Naval Station
Superfund Technical File

Dear Mr. Busko:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's Remedial Action Completion Report for Site 2 – Forrestal Landfill, Naval Station Great Lakes, Great Lakes, Illinois. It was dated June 2009 and was received at the Agency on June 25, 2009. This Remedial Action Completion Report (RACR) documents the implementation of the Forrestal Landfill Cap Work Plan, which occurred in 2004 and 2005, and was submitted to the Agency for review and comment. The Agency has conducted a review of the submittal and has generated the following comments:

- 1) **Section 2.0** – The ARARs section should include IAC Title 35, Part 807.305(c) Final Cover and Part 811.322, Final Slope and Stabilization, Sections (a) through (c) also.
- 2) **Section 3.1** – The second sentence states that neither the slope nor the thickness of the low-permeability clay layer was specified. The Agency believed the cap for Forrestal was to be the same as that for Supply Side, which did have that information provided. Please verify that this was the case and revise as necessary.
- 3) **Section 4.0** – Midway through the third paragraph it mentions that “the cover system is 1 foot or thicker across most of the landfill.” As for Supply Side Landfill, the required minimum thickness for the cap should have been 2 feet, 18 inches of low-permeability clay and 6 inches of topsoil. As such, the Agency needs to know what will be done to correct this situation. Please confirm that this situation has been or

will be, corrected in a timely manner.

- 4) **Section 4.0** – The first sentence under Monitoring Wells repeats the words “has been conducted.” The second occurrence should be deleted.
- 5) **Section 4.0** – There is no discussion here of the transite-impacted cover soil that was discovered on-site or the approved remedy consisting of a geotextile cover and an additional 6 inches of clean topsoil over the impacted topsoil. This will need to be discussed. In addition, if the as-built survey conducted in 2008 and the stated depth of cover, as noted above, are accurate, then the thickness of the cap is severely lacking and requires significant work be done to correct this unacceptable situation. (The daily construction reports list three compacted six-inch lifts of clay and one six-inch lift of topsoil being constructed on the landfill. Combining that with the geotextile and additional six inches of topsoil that was placed afterwards, there should be a *minimum* of 30 inches of cover over the waste materials. The Agency cannot concur with this RACR if the depth of low-permeability clay and topsoil are as listed herein.
- 6) **Appendix A** – Plate C-8 shows what appear to be trees located on top of the landfill cap as well as surrounding the cap, but off of the cap surface. Trees are not allowed on top of the landfill cap. Their root system is too deep and will damage the cap once they take root within it. Please ensure that no trees are allowed to grow within the bounds of the landfill cap, in perpetuity. The trees surrounding the cap are acceptable, provided their root system does not include areas within the cap. The shrubs shown on this figure should be acceptable, provided they are not deep-rooted species.
- 7) **Appendix B** – Suggest adding the following items to the numbered Certification Checklist on the Compliance Certificate: Landfill properly vegetated, Presence of invasive, deep-rooted plant species, Gas vent rotary ventilator in working order and spinning freely.
- 8) **Appendix C** – Under number 4 on the Land Use Control Implementation Plan, suggest rewording the last line as follows: ...serves as a barrier against direct exposure to landfill waste and reduces the infiltration of storm water within the landfill boundary.
- 9) **Appendix C** – Under number 4a on the Land Use Control Implementation Plan, suggest rewording the second sentence as follows: A landfill cap/barrier exists at Site 3...”

- 10) **Appendix C** – Under number 4c on the Land Use Control Implementation Plan, suggest adding the words “disturbance or” between uncontrolled and removal in the first line. Additionally, suggest finishing the last line with the words “and maintain the final remedy/landfill cap.”

- 11) **Appendix C** – Under number 4d on the Land Use Control Implementation Plan, suggest inputting the word “reduces” between the words “and” and “infiltration” in the first line.

If you have any questions regarding anything in this correspondence or would like to discuss these comments, you may 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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