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NSTC GREAT LAKES  
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U S NAVY RESPONSES TO ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
COMMENTS ON THE DRAFT PROPOSED PLAN FOR SITE 5, SITE 9 AND SITE 21 NSTC  
GREAT LAKES IL  
1/6/2014  
TETRA TECH

**Responses to Illinois EPA's November 26, 2013 Comments  
Draft Proposed Plan for Sites 5, 9, and 21  
Naval Station Great Lakes, Great Lakes Illinois**

**Issued: January 6, 2014**

**Comment 1: Cover Page**

The front page of the Proposed Plan should be designed to attract 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 result in the selection of a final remedial alternative that differs from the listed Preferred Alternative.

**Response:** The front page will be modified to address these comments and clarify the purpose of the document, the public comment period, and that the final remedy could change.

In the Proposed Plan text box on the left, the introductory text will be modified as follows to clarify the purpose of the document and purposed remedy:

“This Proposed Plan describes the Navy’s proposed cleanup approach for Site 5 - Transformer Storage Boneyard, Site 9 - Camp Moffett Ravine Fill Area, and Site 21 - Buildings 1517/1506 Area at Naval Station Great Lakes (NSGL) in Great Lakes, Illinois. To address contaminated surface and subsurface soil and groundwater at Sites 5, 9, and 21, the Navy, with the concurrence of Illinois EPA, proposes alternatives that will include the following components...”

To clarify the request for comments and comment period, the heading of the text box on the right will be changed to “Let Us Know What You Think” and the public comment period dates (January 13, 2014 to February 14, 2014) will be placed on a separate line.

To clarify that the final remedy could change, the following sentences within the “About this Document” section will be moved to a separate paragraph: “The Navy, the lead agency, with input from Illinois EPA (the support agency), will make a final remedy selection after reviewing and addressing the public comments. Therefore, the public is encouraged to review and comment on the information presented in this Proposed Plan.”

**Comment 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.

**Response:** The following text will be added to the end of the first paragraph of the Summary of Site Risks sections for Sites 5, 9, and 21:

On page 8 for Site 5: “Potential receptors including construction workers, maintenance/occupational workers, trespassers, and hypothetical residents were evaluated in the risk assessment because they may come into direct contact with surface and/or subsurface soil. Construction workers might also encounter groundwater during excavation activities. Hypothetical residents could be exposed to groundwater by dermal contact, ingestion, and inhalation. Hypothetical residents and maintenance/occupational workers could be exposed to chemicals that migrated from groundwater by vapor intrusion.”

On page 14 for Site 9: “Potential receptors including construction workers, maintenance/occupational workers, and hypothetical residents were evaluated in the risk assessment because they may come into direct contact with subsurface soil. Construction workers might also encounter groundwater during excavation activities. Hypothetical residents could be exposed to groundwater by dermal contact and ingestion. Hypothetical residents and maintenance/occupational workers could be exposed to chemicals that migrated from groundwater by vapor intrusion.”

On page 22 for Site 21: “Potential receptors including construction workers, maintenance/occupational workers, trespassers, and hypothetical residents were evaluated in the risk assessment because they may come into direct contact with surface and/or subsurface soil. Construction workers might also encounter groundwater during excavation activities. Hypothetical residents could be exposed to groundwater by dermal contact, ingestion, and inhalation.”

### **Comment 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 Proposal Plan, or one of the other active measures considered in the Proposal Plan, is necessary to protect public health or welfare or the environment from actual or threatened releases of hazardous substances into the environment.”*

**Response:** The requested statement will be added as a new paragraph after the last paragraph of the Summary of Site Risks section on pages 8, 14, and 22 for Sites 5, 9, and 21, respectively.

**Comment 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 compliance with those ARARs.

**Response:** Disagree. Compliance with ARARs is a threshold criterion and is an essential part of the alternative development. Compliance with ARARs is not typically used as an RAO.

The Proposed Plan does not describe or discuss ARARs because guidance does not call for its inclusion. However the ARARs are noted within the criteria evaluated for the alternative, in the text box on page 7 (first referenced on page 5 in Evaluation of Remedial Alternative Section). Item 2 in the Text box on page 7 will be modified to read as follows: “Does the alternative meet all federal environmental, state environmental, and facility siting statutes, regulations and requirements? ARARs were determined and presented in the FFS. The chosen cleanup plan must meet this criterion.” In order to remind the reader of the criteria evaluated, including ARARs, the following statement will be added to the end of the first paragraph of the “Remedial Action Alternatives” sections for each site: “Based on the evaluation of various technologies documented in the FFS, the five remedial alternatives described below were developed and evaluated for Site (site-specific number) (see box on page 7 for evaluation criteria).”

**Comment 5: Remedial Action Objectives**

For all three sites, this section needs to provide the estimated quantities of the contaminated material to be addressed by each alternative.

**Response:** Alternatives 5-3, 9-3, and 21-3 provide the volume of soil to be excavated, which is the estimated volume of contaminated media at each site. These estimates will be added to the first paragraph under Remedial Action Alternatives by modifying the first sentence of that paragraph as follows:

Site 5

“The FFS presents the options that the Navy and Illinois EPA developed for remedial action at the site to address the estimated 4,000 cy of contaminated soil...”

Site 9

“The FFS presents the options that the Navy developed for remedial action at the site to address the estimated 10,000 cy of contaminated soil...”

Site 21

“The FFS presents the options that the Navy developed for remedial action at the site to address the estimated 3,000 cy of contaminated soil...”

**Comment 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.

**Response:** Agree. A footnote will be added to the arsenic Illinois EPA Class I Groundwater Standard. The footnote will state that: “The Illinois EPA Class I Groundwater Standard takes precedence over the Illinois EPA Class I TACO standard.”

**Comment 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 use of* and activities at the property.”

**Response:** Agree. The requested change will be made.

**Comment 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.”

**Response:** Agree. The requested change will be made on pages 10, 17, and 23 for Sites 5, 9, and 21, respectively.

**Comment 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 use of* and activities at the property.”

**Response:** Agree. The requested change will be made to page 17.

**Comment 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 use of* and activities at the property.”

**Response:** Agree. The requested change will be made.

**Comment 11: Glossary of Terms**

The definition of 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.

**Response:** Agree. The definition of Remedial Investigation will be modified to read as follows: “Mechanism for data collection to characterize site conditions and determine the nature and extent of contamination.”

**Comment 12: Glossary of Terms**

The definition of 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.”

**Response:** Agree. The definition will be changed as requested.

**Comment 13: Glossary of Terms**

The acronyms IAS, VS, UST, RCRA, and CSM should be included and defined here. In addition, the last few acronyms are not listed in alphabetical order.

**Response:** Agree. The requested acronyms will be included in the glossary of terms. The acronyms will be ordered alphabetically.