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NSTC GREAT LAKES  
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TRANSMITTAL LETTER AND U S NAVY RESPONSES TO ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY COMMENTS ON THE DRAFT FINAL RECORD OF DECISION FOR  
SITE 19 SMALL ARMS RANGE 910 NSTC GREAT LAKES IL

4/30/2014  
TETRA TECH



**TETRA TECH**

PITT-04-14-086

April 30, 2014

Project 112G03628

Dept of the Navy  
Naval Station Great Lakes  
NAVFAC MW Code EV  
Attn: Terese Van Donsel  
201 Decatur Ave.  
Building 1A  
Great Lakes, IL 60088

Reference: CLEAN Contract No. N62470-08-D-1001  
Contract Task Order F27S

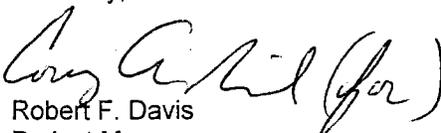
Subject: Response to Illinois EPA Comments on Draft Final Record of Decision  
Site 19 – Small Arms Range 910  
Naval Station Great Lakes  
Great Lakes, Illinois

Dear Ms. Van Donsel:

Please find attached one copy of the Response to Illinois Environmental Protection Agency Comments on the draft final Record of Decision. These response to comments were not included with the final Record of Decision submittal.

Copies have also been distributed as indicated below. If you have any questions, please call me at 412-921-7251.

Sincerely,

  
Robert F. Davis  
Project Manager

RFD/cm

Enclosure

cc: H. Hickey, NAVFAC MW (1 copy)  
O. Thompson, USEPA Region 5 (2 copies)  
B. Conrath, Illinois EPA (3 copies)  
J. Trepanowski, Tt (Letter only)  
File CTO F27S, Tt (1 copy)  
Administrative Record, Tt (1 copy)

**RESPONSES TO ILLINOIS EPA COMMENTS  
DATED AUGUST 6, 2013  
DRAFT FINAL RECORD OF DECISION FOR  
SITE 19 – SMALL ARMS RANGE 910  
NAVAL STATION GREAT LAKES  
GREAT LAKES, ILLINOIS**

- 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.”

Response: The first sentence in Section 1.1 was replaced with the sentence above.

- 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

Response: The requested correction was made for the Authorizing Signatures.

- 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.

Response: No additional text was added to this section since the revised reference blood level of 5 µg/DL has not been finalized. However the results of of the IEUBK and ALM model are provided below for your information.

Child Lead Model Results

The results from the IEUBK Model (USEPA, 2009b) estimated percent chance that any child will have a blood lead value greater than 5 µg/DL was calculated to be 1.703% percent, which is less than the USEPA acceptable target of 5 percent.

Adult Lead Model Results

ALM (USEPA, 2009c) results indicate that the central estimate blood-lead levels for construction workers and maintenance/occupational workers and their fetuses were less than the established level of concern (5 µg/DL) and the probabilities that receptor blood-lead levels would be less than the U.S. EPA’s goal of limiting exposure to lead so that no more than 5 percent of the exposed receptors have an estimated blood-lead level greater than the established level of concern. The estimated percent that the receptor will have a blood lead value greater than 5 µg/DL was 0.5 percent and 0.3 percent, respectively.

- 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.

Response: The following text was added to the third bullet “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.”

The following sentence was added to the paragraph following the bullet list “If the Navy transfers, sells, or leases the property, the Navy will be required to meet the requirements of Illinois EPA’s Uniform Environmental Covenants Act 765 Illinois Compiled Statutes 122 (an environmental covenant).”

- 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.

Response: The fifth bullet was revised to “LUCs will not result in short-term risks nor will they adversely impact the surrounding community or the environment. Excavation and Disposal has the potential to result in short-term risks to workers, the community, or the environment; however, engineering controls and compliance with health and safety procedures would minimize risks.

- 6) **List of Acronyms and Abbreviations** – The use of capital letters in the definitions is inconsistent. Please review and revise as necessary.

Response: The list was reviewed by a Technical Editor. Each definition was started with a capital letter. Only proper names, such as ARARs, used capital letters for each word.

- 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.

Response: The Navy will review the LUCMOA with Illinois EPA.