

N00210.AR.000670
NSTC GREAT LAKES
5090.3a

TRANSMITTAL EMAIL AND U S NAVY RESPONSES TO ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY COMMENTS ON THE RECORD OF DECISION FOR SITE 19 NSTC
GREAT LAKES IL
8/27/2013
NAVFAC MIDWEST

Davis, Robert

From: Van Donsel, Terese A CIV NAVFAC MW, IPT <terese.vandonsel@navy.mil>
Sent: Tuesday, August 27, 2013 4:38 PM
To: Conrath, Brian A.
Cc: Davis, Robert
Subject: Site 19 ROD Response to Comments
Attachments: RTC IEPA ROD comments.docx
Signed By: terese.vandonsel@navy.mil

Brian,

Here is Tetra Tech's response to comments for Site 19. Since the change in the lead rule isn't official, the response to your question regarding the 5 ug/DL blood level is provided in the response to comments but we don't plan to include the discussion in the ROD.

If all looks good here, we'll send you what I hope will be the final ROD.

Thanks!

V/r,
Terese

**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.