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NSTC GREAT LAKES
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LETTER REGARDING ILLINOIS ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE DRAFT FINAL FEASIBILITY STUDY FOR SITE 12 HARBOR DREDGE SPOIL AREA
NSTC GREAT LAKES IL
6/2/2014
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

(217) 557-8155
(FAX) 782-3258

June 2, 2014

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

Re: Draft Feasibility Study Report
for the Site 12 – Harbor Dredge Spoil Area
Naval Station Great Lakes
Great Lakes, Illinois

0971255048 -- Lake County
Naval Station Great Lakes
Superfund/Technical File

Dear Ms. Van Donsel:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's *Draft Feasibility Study for the Site 12 – Harbor Dredge Spoil Area, Naval Station Great Lakes, Great Lakes, Illinois*. It was dated March 2014 and was received at the Agency on March 10, 2014. The Feasibility Study Report (FS) describes the formulation and evaluation of remedial alternatives for contaminated soil and groundwater at Site 12 and is based upon data collected during the Remedial Investigation/Risk Assessment.

Illinois EPA has conducted a review of the submittal and has generated the following comments for the Navy's consideration.

- 1) **General Comment** – As this document was submitted for review before Agency comments on the Draft Final Remedial Investigation/Risk Assessment (RI/RA) were addressed, please ensure that all subsequent revisions to the RI/RA are carried forward to the FS, as appropriate.
- 2) **Section 1.2.7.3** – The calculated non-carcinogenic risk for the child resident should be stated here.
- 3) **Section 2.2.1** – Suggest a third Remedial Action Objective to address exposure of maintenance/occupational workers exposure to surface and subsurface soil.
- 4) **Section 2.2.2.1** – The last statement in the next to last paragraph states, “The I/C and construction worker exposure TACO criteria will not be considered in the evaluation of the alternatives.” This is inconsistent with the FS for Sites 5, 9, and 21, which stated just the

opposite. It is understood that the calculated risks for the construction worker at this site were less than the USEPA target risk range of 1×10^{-4} to 1×10^{-6} . However, the risks for the maintenance/occupational worker were within the risk range, not below.

- 5) **Table 2-1** – Another TBC to be included on the chemical-specific ARAR Table would be the most recent Preliminary Remediation Goals, U.S. EPA Region 9. They may be only TBCs, but they are, in many instances, more stringent than the TACO screening values.
- 6) **Table 2-3** – Please include the Illinois Solid Waste and Special Waste Hauling regulations (35 Illinois Administrative Code (IAC) 809) in the ARAR table.
- 7) **Section 4.2.2** – Alternatives 2 and 3 list Natural Attenuation as part of the remedy. However, there are no monitoring activities (groundwater sampling) included along with the natural attenuation. Please explain how the addition of Natural Attenuation, without some type of monitoring, is considered an enhancement of the remedy. Simply mentioning natural attenuation without providing some way of determining that it is actually occurring is not acceptable.
- 8) **Section 4.2.3.1** – The description for Alternative 2A assumes approximately 5 years will be required for treatment. From where did this estimate come? Please explain its origin.
- 9) **Appendix C** – On page 2, the site is mistakenly identified as the Naval Weapons Industrial Reserve Plant at the end of the first paragraph.
- 10) **Appendix C** – On page 3, the FS/Corrective Measures Study for Site 4 (Area of Concern 22) – Former Underground Storage Tanks is mentioned, rather than the FS for Site 12.

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
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land



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cc: Corey Rich, Tetra Tech NUS, Inc.

Owen Thompson, USEPA (SR-6J)