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LETTER REGARDING ILLINOIS ENVIRONMENTAL PROTECTION AGENCY COMMENTS  
ON THE U S NAVY RESPONSES TO COMMENTS ON THE DRAFT FEASIBILITY STUDY  
REPORT FOR SITE 12 NSTC GREAT LAKES IL  
6/16/2014  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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June 16, 2014

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

Re: Navy Responses to Agency Comments  
On the Draft Feasibility Study Report for  
Site 12 at 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 responses to Agency comments on the *Draft Feasibility Study for the Site 12 – Harbor Dredge Spoil Area, Naval Station Great Lakes, Great Lakes, Illinois*. They were received via electronic mail on June 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 provided responses and has generated a few follow-up comments for the Navy's consideration.

- 1) The responses to comment numbers 1, 2, 7, 9, and 10 are acceptable.
- 2) The response to comment 3 is not acceptable. The "maintenance/occupational worker" receptor was included and evaluated in the Remedial Investigation/Risk Assessment Report upon which this Feasibility Study (FS) was based. This receptor was in addition to the industrial/commercial worker. Table 6-13 of the Remedial Investigation Report not only provides calculated risk values for this receptor different from the industrial/commercial worker, but those values are reported as being within the United States Environmental Protection Agency's risk range ( $2 \times 10^{-5}$  for surface soil and  $4 \times 10^{-5}$  for subsurface soil). Illinois EPA does not consider those values representative of "no unacceptable risk." Illinois EPA's point of departure for acceptable risk is  $1 \times 10^{-6}$ . Risks within the risk range are not

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deemed acceptable, but require risk management decisions to be made, which may require that remedial action be taken. As such, Illinois EPA's original request for a Remedial Action Objective to address the risks to those receptors is reasonable.

- 3) Regarding the first part of the response to comment number 4, see the previous comment. For the second part, there are calculated risks to current maintenance/occupational workers, and these risks would be applicable to potential future receptors as well. Exposure routes and criteria for the maintenance/occupational workers should be considered in the evaluation of alternatives.
- 4) For response to comment number 5, it is noted that the Region 9 PRGs have been replaced by the Oak Ridge National Laboratory/USEPA Regional Screening Levels for Chemicals at Superfund Sites. In addition, while Illinois EPA understands that they would be merely To Be Considered (TBC) guidelines, the listed State of Illinois Tiered Approach to Corrective Action Objectives (TACO) regulations are TBCs as well. The Site 19 FS listed both the Region 9 PRGs and the TACO regulations on the ARAR Table. Illinois EPA believes this FS should list both the Oak Ridge National Laboratory/USEPA Regional Screening Levels for Chemicals at Superfund Sites and the TACO regulations on its ARAR Table.
- 5) The State does not agree with the response to comment number 6. Please include the specified regulations in the table as was done for the FS for Site 19.
- 6) The response to comment number 8 answers the question posed by the comment. However, if no explanation is included in the FS, the reader will not have that information. Please include the explanation provided within the FS Report.

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](mailto: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)