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LETTER FROM ILLINOIS ENVIRONMENTAL PROTECTION AGENCY REGARDING
PROPOSED PILOT STUDY FOR DISPOSAL OF LEACHATE LANDFILLS 6 AND 7 FORT
SHERIDAN IL
1/31/2007
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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January 31, 2007

Assistant Chief of Staff for Installation Management
Base Realignment and Closure Division
ATTN: Michael G. Drumheller
600 Army Pentagon
Washington, DC 20310-0600

Re: Proposed Pilot Study for Disposal of Leachate
At Landfills 6 and 7 at the former
Fort Sheridan, Fort Sheridan, Illinois

0970555001/Lake
Fort Sheridan (BRAC)
Superfund/Technical

Dear Mr. Drumheller:

Over the past year, Illinois EPA has been engaged with Mr. Kurt Thomsen, the Army's Fort Sheridan Environmental Coordinator, and various persons from KEMRON, Inc. (KEMRON) regarding a proposed pilot study to determine if the leachate produced by Landfills 6 and 7 could be used for irrigation of trees and lawns off the cap of Landfill 7. The Agency considered this option to be reasonable and potentially feasible. As such, when requested, a significant amount of time and effort was spent by Agency personnel to determine what the applicable regulations and permit requirements would be to conduct such a study. The expectation was that the pilot study would be conducted as soon as possible so that, if that method of leachate disposal were deemed acceptable, the Final Record of Decision for Landfills 6 and 7, currently scheduled for Fall 2007, would include it rather than the current method, which is to truck it to a disposal facility in Wisconsin.

On January 26, 2007, Illinois EPA received an electronic mail message from Mr. Lou Ehrhard, of KEMRON, stating the proposed Pilot Study had been shelved. The message read, "While we think this pilot study would produce beneficial results for the long-term management of the groundwater/leachate generated at Landfills 6 and 7, the IEPA requirements for this work make it difficult for us to move forward with the project at this time. I believe the Army is still interested in performing the pilot study and may find some additional funding necessary to perform this work, possibly in 2008." This led us to believe the reason for shelving the study was strictly monetary in nature, even though use of the leachate in this manner very likely would save money

in the long run. This was extremely disappointing to read. The Agency had expected that this study, which would qualify as an "*Alternative Treatment Technology*" as defined in the NCP, would be initiated this year to determine its applicability for use at this site. The potential for significant cost savings and for a beneficial reuse of the leachate would have been much preferred over the continued hauling to another state for disposal. Illinois EPA had been told the Army was on board with the proposed pilot study.

The State realizes that KEMRON was merely looking after their financial interest based upon their GFPR contract with the Army, but the potential for long-term cost savings for the Army and the taxpayer would appear to be worth the upfront expense. Additionally, as one part of the CERCLA final remedy for Landfills 6 and 7, the long-term method for handling the leachate must be factored into the evaluation of the nine criteria used to select a final remedy. The short-term risks would be significantly less than trucking it out of state. The long-term effectiveness and permanence of disposing of the leachate on-site would also compare favorably against trucking it off-site for disposal, especially when one considers that the final remedy for Landfills 6 and 7 will be in place in perpetuity and leachate disposal may well be required just as long.

While selection of the final remedy remains the Army's decision as Lead Agency, the choice to conduct the pilot study appears to have been left up to KEMRON. Illinois EPA believes decisions affecting the proposed final remedy should be made by the Lead Agency. Illinois EPA requests the Army be more involved in the closure process at Fort Sheridan and resolve to make these types of decisions, not leave them up to their contractor. However, the choice is the Army's to make as is the long-term liability and financial responsibility for disposal of the leachate. KEMRON's contract, and their financial liability, runs out shortly after completion of the Record of Decision. The long-term costs associated with leachate disposal are not part of their contract. Once that contract expires, the Army will again be saddled with the long-term Operations and Maintenance of the remaining sites at Fort Sheridan in perpetuity.

Disposal of the leachate as proposed in the pilot study, if designed and operated in accordance with the cited regulations, would comply with the Applicable or Relevant and Appropriate Requirements (ARARs), be protective of human health and the environment, and compare favorably against the current method of disposal when judged against the 7 remaining CERCLA remedy selection criteria. It also could save the Army and the taxpayer a significant amount of money over the life of the closure activities at Landfills 6 and 7. The Agency believes the pilot study should be conducted as originally planned. We therefore request the Army become more involved in the closure process at Fort Sheridan and obtain and obligate the necessary funding to conduct the pilot study. The Army should then instruct their contractor, KEMRON, to complete and submit the design for the pilot study and, upon receiving Agency approval, conduct the study during the upcoming growing season. The Final Record of Decision for Landfills 6 and 7 should not be issued until the pilot study has been completed and the results analyzed.

Pilot Study Shelved Letter
Landfills 6 and 7, Fort Sheridan, IL
January 31, 2007
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As the 2007 growing season is rapidly approaching, a swift response to this letter is requested.
Thank you.

If you have any questions regarding this correspondence, you may contact me at 217/557-8155 or
via electronic mail at Brian.Conrath@illinois.gov.

Sincerely,

Brian A. Conrath

Brian A. Conrath
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Federal Facilities Unit
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Bureau of Land

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cc: Bill Brawner, US Army
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