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LETTER AND COMMENTS FROM ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
REGARDING DRAFT FINAL PROPOSED PLAN LANDFILL 1 FORT SHERIDAN IL
6/28/2004
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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June 28, 2004

Headquarters, Forces Command
Deputy Chief of Staff, G1
Attn: AFG1-BC (Victor Bonilla)
1777 Hardee Avenue, SW
Fort McPherson, Georgia 30330-1062

Re: Draft Final Proposed Plan for Landfill 1
Department of Defense Operable Unit
Fort Sheridan, Illinois, Dated June 23, 2004

0970555001/Lake
Fort Sheridan (BRAC)
Superfund/Technical

Dear Mr. Bonilla:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Draft Final Proposed Plan for Landfill 1, Department of Defense Operable Unit, Fort Sheridan, Illinois. It was dated June 23, 2004 and received on June 24, 2004. The Army requested an expedited review to assist the Army in addressing the governmental schedule for acquiring funding. Illinois EPA has reviewed the submittal and has the following comments.

- 1) **General** – Included with the submittal was an additional version of the plan that highlighted the changes made to the document to aid in the Agency’s review. The effort is appreciated. However, that version appears to only highlight the changes made regarding previous Agency comments. There are other changes to the document, made since the draft version was submitted, that have not been highlighted. It would have been more helpful had all of the changes been highlighted. Nonetheless, the Agency did perform an expedited review of the submitted Draft Final Proposed Plan.
- 2) **Response to Comment (RtC) Number 2** – The added wording is acceptable. However, the end of the sentence just previous to the added wording has been changed. The Agency prefers the original wording, which was consistent with that used in the Proposed Plan for Landfill 5. That sentence should conclude with, “...recreational land users *through direct contact with or ingestion of the substances if they are exposed.*”
- 3) **RtC Number 5** – Due to the recent Agency decision regarding the need for a Land Use Control Memorandum of Agreement (LUCMOA), the original comment is no longer valid. The Agency suggests removing the last three sentences from the last full

paragraph on page 5.

- 4) **RtC Number 12** – The requested information regarding the post-removal site grading should be included in this Proposed Plan. This plan should present a complete picture of the proposed alternative, both before and after the remedial effort is complete. The public will want, and needs, to know what will become of the access road that currently runs across the off-site portion of Landfill 1. Please provide this information.
- 5) **RtC Number 17** – The response is acceptable. However, the wording that has been added to this section, specifically the second sentence, is not acceptable. The site-specific LUC planning cannot begin after the design is completed. As agreed to, in lieu of a signed LUCMOA, the details of the land use controls (implementation, enforcement, inspections, etc...) will need to be included as an appendix to the design document. Therefore, the planning will have to be performed and completed prior to completion of the design, in order for that information to be incorporated into the design document.
- 6) **RtC Number 18** – The response is acceptable. However, the date for the public meeting should be July 29, 2004, not July 28, 2004. Please correct.

The Army needs to respond to and incorporate the Agency's additional comments on the Draft Final Proposed Plan. Once this has been accomplished, the Agency should be able to concur with the Army's choice for a remedial alternative for Landfill 1.

If you have any questions regarding this correspondence, you may contact me at 217/557-8155 or via e-mail at Brian.Conrath@epa.state.il.us.

Sincerely,

Brian A. Conrath

Brian A. Conrath
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

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cc: Owen Thompson, USEPA (SR-6J)
Mark Shultz, US Navy - EFA Midwest
Kurt Thomsen, Fort Sheridan EC

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