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LETTER AND COMMENTS FROM ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
REAGRDING DRAFT REMEDIAL INVESTIGATION AND BASELINE RISK ASSESSMENT  
ADDENDUM FORT SHERIDAN IL  
3/14/2001  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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THOMAS V. SKINNER, DIRECTOR

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March 14, 2001

Ms. Colleen Reilly  
Fort Sheridan BRAC Office  
3155 Blackhawk Drive Suite 17  
Fort Sheridan, IL 60037-1289

Re: Draft RI/BRA Addendum  
for the DOD Operable Unit

0970555001/Lake Co.  
Fort Sheridan  
Superfund/Tech. Files

Dear Ms. Reilly:

On January 11, 2001, the Illinois Environmental Protection Agency ("Illinois EPA") received the Draft Remedial Investigation/Baseline Risk Assessment ("RI/BRA") Addendum for the Department of Defense Operable Unit ("DOD OU") at Fort Sheridan, Illinois. Science Applications International Corporation prepared this document on behalf of the U.S. Army Corps of Engineers and the Fort Sheridan BRAC Office. The RI/BRA reports the findings from the third phase of remedial investigation for the DOD OU and incorporates sampling results from the Landfill 6 and 7 interim remedial action and the Coal Storage Area #3 removal action. Illinois EPA completed its review and comments follow:

1. Section 1.2, Phase III RI Study Area Descriptions: Please include the estimated acreage of each DOD OU study area in subsections 1.2.1 through 1.2.10.
2. Table 3.5; Analytical Detection Limits, Pages 3-15 to 3-18: As presented, only SW-846 reporting limits above USEPA Region IX PRG's are highlighted. Please revise this table to highlight OQAPP and/or SW-846 reporting limits in excess of State of Illinois Class II Groundwater Quality Standards (35 IAC 620) and Tiered Approach to Corrective Action Objectives ("TACO," 35 IAC 742) Tier I soil criteria.
3. Table 3-6, Comparison of SW-846 and OQAPP Reporting Limits - Water, Page 3-19: Please include a column containing Illinois' Class II Groundwater Quality Standards.

GEORGE H. RYAN, GOVERNOR

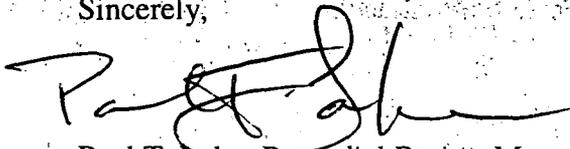
4. Table 3-7, Comparison of SW-846 and OQAPP Reporting Limits – Soil, Page 3-20: Please include a column containing the USEPA Region IX PRGs and another column indicating TACO Tier I soil objectives, or one column with the lower of the two screening values for a particular analyte.
5. Section 4.4.1, Background, Page 4-9: Please include in Section 4 a table or tables showing Fort Sheridan's calculated background inorganic groundwater, soil, and sediment UTL's from the *Final Background Sampling and Data Evaluation Report* (ESE 1997). No specific background table or tables could be found in Appendix D-1 either, only background values incorporated into the COPC screening tables. Since the Phase III background samples were not incorporated into 1997 UTLs, further explain here how the off-post sediment and on-post dioxin/furan background sample results are intended to be used in risk-management decision making.
6. Section 4.4.4.3, WRN Phase III Analytical Results, Page 4-19: Explain from which specific incinerated materials dioxins/furans are expected byproducts.
7. Figure 4-1, Phase III Background Sampling Locations, Page 4-35: Revise this figure to more clearly identify the former northern boundary of Fort Sheridan and the relative location of off-site sediment background sampling locations to the former Fort Sheridan boundary. Insert A on this figure also needs better identification of dioxin/furan background sampling locations relative to the whole of the DOD OU.
8. Tables 4-3 to 4-13, Analytical Results: Many of the results in these tables are bolded, but no explanation of this highlighting could be found. Please explain on each of the tables why results are bolded. Suggest adding another table up front with regulatory cleanup (screening) criteria for the various media to make comparison to field results possible for the reader without using other documents. Further, by highlighting results that exceed the screening criteria, contaminants of concern would be much more apparent to the reviewer.
9. Section 5.2.1.3, Identification of Potential Human Exposure Pathways, Page 5-9: Please clarify in the text that the exposure pathways for contaminated sediments and surface water were not evaluated in the addendum report because previous evaluations did not indicate significant human health risks, not because the pathways were deemed incomplete.
10. Section 5.3.2, Lead Toxicity, Page 5-13: It is stated that the "average" detected concentrations of lead in the soil were compared to the action level of 400 mg/kg. It is not clear whether this "average" was the arithmetic mean or the 95% upper confidence limit ("UCL95") of the mean. Clarify which exposure point concentrations were used in the evaluation of lead soil concentrations at various sites in the DOD OU. The document eliminated lead from further consideration

based upon this "averaging." Illinois EPA has a concern regarding the omission of lead from the risk assessment due to fact that certain sample locations exhibited elevated levels of lead. For example, lead was detected at 2,450 mg/kg at the Wells Ravine Northern Tributary ("WRN") sample location SB-WRN-15, 1,410 mg/kg at the WRN sample location TP-WRN-03, and 1,230 at the Wells Ravine Western Extension sample location TP-WRW-04. These levels may be a concern for a construction worker scenario.

11. Section 5.4.4, Summary of Human Health Risk Characterization, Page 5-16: In the sections describing the results of the risk characterization, only in those cases where total risk was found to be greater than  $1 \text{ E-}04$  were contributing contaminants identified. Illinois EPA requests a set of tables or text that describes those contaminants contributing significantly to site risk for any sites where the total risk exceeds  $1 \text{ E-}06$ .
12. Section 5.4.4.1 and 5.4.4.2, Background, Pages 5-19 and 5-28: Since dioxins were included as part of the background evaluation, remove statements here that refer to risks attributable to "naturally occurring substances."

Should you have any questions regarding this letter, please do not hesitate to contact me at the number above.

Sincerely,



Paul T. Lake, Remedial Project Manager  
Federal Sites Remediation Section  
Bureau of Land

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CC: Owen Thompson, USEPA (HSRL-5J)  
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Mona Reints, US Army Reserve

Ms. Colleen Reilly, BEC  
Draft DOD OU RI/BRA  
March 14, 2001  
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1970555001 - Lake Co.  
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