

N00210.AR.001314  
NSTC GREAT LAKES, IL  
5090.3a

LETTER AND COMMENTS FROM ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
REGARDING RECORD OF DECISION SITE 12 HARBOR DREDGE SPOIL AREA NSTC  
GREAT LAKES IL  
2/18/2016  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

BRUCE RAUNER, GOVERNOR

LISA BONNETT, DIRECTOR

(217) 557-8155

February 18, 2016

NAVFAC MIDLANT

Attn: Maritza Montegross, Code OPTE3

9324 Virginia Avenue

Norfolk, VA 23511-3095

Re: Record of Decision for 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. Montegross:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's *Record of Decision for Site 12 – Harbor Dredge Spoil Area, Naval Station Great Lakes, Great Lakes, Illinois*. It was dated December 2015 and was received at the Agency on December 14, 2015. The Record of Decision presents the selected remedy for Site 12, which was chosen by the Department of the Navy (Navy), as lead Agency, in accordance with the statutory and regulatory requirements under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

Illinois EPA has completed our review of the Record of Decision and is providing the following comments.

- 1) **Section 2.3** – Here and throughout the document, the Community Participation details will need to be updated, once that information is available.
- 2) **Section 2.5.3** – This section should specify the quantity/volume of contamination to be addressed and provide the concentrations of the identified contaminants of concern for each matrix.
- 3) **Section 2.9** – This section needs to discuss the Applicable or Relevant and Appropriate Requirements (ARARs) associated with the alternatives. It should also discuss the estimated time required for implementation and the time to reach cleanup levels.

4302 N. Main St., Rockford, IL 61103 (815)987-7760  
595 S. State, Elgin, IL 60123 (847)608-3131  
2125 S. First St., Champaign, IL 61820 (217)278-5800  
2009 Mall St., Collinsville, IL 62234 (618)346-5120

9511 W. Harrison St., Des Plaines, IL 60016 (847)294-4000  
5407 N. University St., Arbor 113, Peoria, IL 61614 (309)693-5462  
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200  
100 W. Randolph, Suite 10-300, Chicago, IL 60601

- 4) **Section 2.10** – The nine evaluation criteria should each be briefly defined prior to the comparison of the alternatives.
- 5) **Section 2.13** – As was done for the Site 19 Record of Decision, the bullet item which discusses notification of Illinois EPA prior to property transfer should conclude with “An environmental covenant will be required to be placed on the property, unless the site no longer contains hazardous substances in soil and groundwater at levels that do not allow for unrestricted use and unlimited exposure.”
- 6) **General Comment** – The Agency is providing these comments prior to completion of the formal public comment period on the Proposed Plan for the sake of expediency. As of the date of this letter, there have been no public comments received by the Navy. However, Illinois EPA reserves the right to revise these comments or our position regarding the final remedy pending the receipt of any public comments or information that may not yet have been received.

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*

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

BAC:gs\cls:PIGLNTC\Site 12\Site12RODrvw.docx

cc: Corey Rich, Tetra Tech NUS, Inc.

Owen Thompson, USEPA (SR-6J)