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NSTC GREAT LAKES
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LETTER AND COMMENTS FROM ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
REGARDING CLOSURE OF BUILDINGS 90, 144, 238, 329, 3114A, 3216, 3216B, 3402, 3511
NS GREAT LAKES IL
8/31/2004
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



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August 31, 2004

Department of the Navy
 EFA Midwest
 c/o Dan Fleming
 Environmental Department
 201 Decatur Avenue
 Great Lakes, Illinois 60088-5600

Re: August 1, 2004 Letter Request for UST
 Closure at Bldg 90, 144, 238, 329, 3114A,
 3216, 3216B, 3402, and 3511

0971255048 – Lake County
 Naval Training Center Great Lakes
 Superfund/Technical Reports

Dear Mr. Fleming:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's letter requesting closure at Buildings 90, 144, 238, 329, 3114A, 3216, 3216B, 3402, and 3511 and the CDs, which provided electronic versions of 45-Day Reports/Corrective Action Closure Reports, that were attached. They were dated August 1, 2004. Also in the Agency's possession is the Report entitled *Leaking Underground Storage Tank Relative Risk Ranking Sampling Eighteen LUST Sites at GLNTC, Great Lakes, Illinois*. It was written by Toltest, Inc. and was dated April 2003. The Agency has reviewed these and other relevant documents and has the following comments:

Building 90

It appears that the 45-Day Report dated March 2003 was never submitted to the Agency. The Agency suggests the Navy complete the 45-Day Report and specify that it is also a Corrective Action Completion Report (CACR) and submit it officially to the Agency. In that report, the Navy will need to request/state how the Tier I Residential Remediation Objectives were met or how the Navy intends to designate the site for Industrial/Commercial use by means of the necessary Land Use Controls, etc...or whatever the Navy chooses for site closeout. Once that report is received, Illinois EPA can then review it and make a determination if the site is eligible

for closeout.

Building 144

In the CACR for this site dated July 1991, there were several recommendations made to collect additional data, both groundwater and air samples. Was this data ever collected and, if so, what were those results? Additionally, the samples collected as part of the LUST Relative Risk Ranking Sampling (2002) appear to have been collected in improper areas for locating contamination. When looking at the figures in the 1991 CACR, there is no Building 105 shown at all. Those figures show Building 144 across the street from Building 106, the Fire Station, on one side and across the street from Building 112, the Post Office, on the other. This is incorrect as Building 105 is (was) actually across the street from the Fire Station. The samples collected in 2002 are shown as being collected very near Building 105. The contamination for Building 144 was shown as being on the west side of Building 144. Therefore, the samples collected in 2002 appear to have been collected where Building 144 was located, not to the west of the building where the contamination was. Also, if the groundwater flow in this area is the same as next door at Building 105, the monitoring wells are not in the right places to find contaminated groundwater. The flow direction is to the east-southeast and there are no wells in that direction.

Given the data in the CACR and the information presented above, a new investigation is probably warranted for this site to fully delineate nature and extent of contamination.

Building 238

The LUST Incident number for this site is 911218. No reports have been submitted to the Agency regarding this site. The LUST Relative Risk Ranking Sampling data is insufficient to close out this site. The Agency suggests the Navy go back to this site and collect a sufficient number of confirmation samples from the appropriate locations, perform whatever remedial actions may be necessary, and then draft and submit a 45-Day/Corrective Action Completion Report to the Agency. The Agency will then review the report and determine if an NFR is appropriate.

Building 329

The LUST Incident number for this site is 990712. A 45-Day Report is on file at Illinois EPA. It was not a Corrective Action Completion Report. The original confirmation samples yielded values for several polynuclear aromatic hydrocarbons above the TACO Tier I Residential Screening values. The LUST Relative Risk Ranking Sampling had only one of the three samples in an area expected to be contaminated. That sample, soil-boring 2, was only to a depth of 8 feet. The original excavation in that area was to 10 feet. Therefore, the sample was not collected in native soil, but in backfill. The data from that sample is useless. The Agency suggests the Navy

go back to this site and collect a sufficient number of confirmation samples from the appropriate locations, perform whatever remedial actions may be necessary, if any, and then draft and submit a Corrective Action Completion Report to the Agency. The Agency will then review the report and determine if an NFR determination is appropriate.

Building 3114A

There was no LUST Incident number issued for this site and no 45-day report was submitted. There is very little detail provided on which to make a determination. The figure in the LUST Relative Risk Ranking Sampling report does not provide the location of the UST in relation to Building 3114A or the samples that were collected. It also does not provide a scale. Given the lack of information, Illinois EPA is unable to determine if the site is clean or not. Additional information will need to be provided before the Agency can concur that there is no risk to human health or the environment at this site.

Building 3216

The data for this site provided in the Final Closure Report are insufficient to confirm that this site is safe. There were not enough confirmation samples taken to verify that there is no contamination remaining. Also, the previous 45-day report was not a Corrective Action Closure Report. Therefore, the Agency suggests the Navy go back to this site and collect a sufficient number of confirmation samples from the appropriate locations, perform whatever remedial actions may be necessary, if any, and then draft and submit a complete Corrective Action Completion Report to the Agency. The Agency will then review the report and determine if an NFR determination is appropriate.

Building 3216B

This site should be a high priority and needs to be dealt with immediately. Every effort should be expended to obtain funding and begin work as soon as possible.

Building 3402

There was no LUST Incident number issued for this site and no 45-day report was submitted. There is very little detail provided on which to make a determination. The August 1, 2004 letter discusses the results of the analyses from the LUST Relative Risk Ranking Sampling report and states that there were no results above the remediation objectives. In the referenced LUST report, it states that petroleum hydrocarbon impacted soils were left within the UST excavation previously. This is not mentioned in the letter. In addition, the location of the tank is not depicted in Figure 2.0P,Q in the LUST report. Additional documentation will be required before the Agency can concur that there is no risk to human health or the environment at this site.

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Naval Station Great Lakes
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Building 3511

There was no LUST Incident number issued for this site, no 45-day report was submitted, and no soil or groundwater samples were collected. There is very little detail provided on which to make a determination. The August 1, 2004 letter discusses the results of the analyses from the LUST Relative Risk Ranking Sampling report and states that there several PNAs exceeding TACO Tier I Residential values and also two ground water samples with results exceeding Illinois EPA Class I/II GROs. Given the lack of information, Illinois EPA is unable to determine if the site is clean or not. Additional information will need to be provided before the Agency can concur that there is no risk to human health or the environment at this site. Although not as high a priority as Building 3216B above, this site should be listed higher on the priority list than others discussed in the Navy's letter.

If you have any questions regarding this correspondence, you may contact me at (217) 557-8155 or via electronic 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: Tom Henninger, LUST