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NSTC GREAT LAKES
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LETTER AND COMMENTS FROM ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
REGARDING THE CORRECTIVE ACTION COMPLETION REPORT BUILDING 3216B NS
GREAT LAKES IL
8/17/2010
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

(217) 557-8155
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August 17, 2010

Engineering Field Activity, Midwest
Attn: Mr. Howard Hickey
Building 1A, Code 931
201 Decatur Avenue
Great Lakes, Illinois 60088-5600

Re: LPC # 0971255004 -- Lake County
Naval Station Great Lakes – Building 3216B
Great Lakes, Illinois
IEMA Incident Nos. 992703 and 20011971
Leaking UST Technical File and Superfund Technical File

Dear Mr. Hickey:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's Corrective Action Completion Report, Building 3216B, Great Lakes Naval Training Center, Great Lakes, Illinois. The Completion Report was generated by Versar, Inc. and was dated January 2003. It was received at the Agency on August 6, 2010. In the submittal the Navy provides information regarding the removal of a 3500 gallon diesel underground storage tank and requests a No Further Remediation (NFR) Letter be issued based on the submitted information. The Illinois EPA has reviewed the Completion Report and has generated the following comment.

Section 3.2 Soil Ingestion Route SRO lists the Tiered Approach to Corrective Action Objectives (TACO) requirements for excluding the soil ingestion exposure route followed by two sentences justifying why this exposure route may be excluded at this site. As listed, the second requirement is that an engineered barrier is in place that is constructed of compacted clay, asphalt, concrete or other material approved by the Agency and/or permanent structures such as buildings and highways. The first sentence following states, "Concentrations of PNAs did not exceed Tier I SROs for soil ingestion within the top three feet of fill soil within and around the former excavation." However, in Section 1.5.2, the fill material in the former excavation is reported as CA-6 stone, not soil or any of the materials called for in the TACO requirement for an engineered barrier. Therefore, an approved engineered barrier is not currently in place so the soil ingestion exposure route may not be excluded.

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Building 3216B CACR Review
Naval Station Great Lakes
Great Lakes, Illinois
August 17, 2010
Page 2 of 2

The remainder of the Completion Report appears to follow the TACO regulations appropriately and, as such, is acceptable. Therefore, the Navy has two options for remedying this deficiency. They may construct a proper engineered barrier over the site or conduct additional remedial efforts to remove the contamination that exceeds the soil ingestion remediation objective. Once the necessary work has been completed, the Navy could then submit a revised Corrective Action Completion Report and therein request a No Further Remediation (NFR) Letter be issued.

The Agency would ask that the Navy include the common street address of Building 3216B within the revised Completion Report.

If you have any questions regarding anything in this letter or require additional information, please contact me at (217) 557-8155 or by electronic mail at Brian.Conrath@illinois.gov.

In accordance with Public Act 96-0603, which went into effect on August 24, 2009, any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

Sincerely,

Brian A. Conrath

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

BAC: rac:HGLNTC\LUSts\B3216BCACRrww

cc: Tom Henninger, LUST