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NSTC GREAT LAKES
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LETTER AND COMMENTS FROM ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ON
SITE INVESTIGATION REPORT BUILDING 222 NS GREAT LAKES IL
2/4/2014
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



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

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

(217) 557-8155
(FAX) 782-3258

February 4, 2014

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

Re: Site Investigation Report
Building 222 (AOC 222)
Naval Station Great Lakes
Great Lakes, Illinois

0971255048 – Lake
Great Lakes Naval Station
Superfund/Technical

Dear Mr. Stoick:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's *Site Investigation Report, Building 222, Naval Station Great Lakes, Great Lakes, Illinois*. It was dated December 2013 and was received at the Agency on January 17, 2014. The Site Investigation Report documents the sampling activities at Area of Concern 222 (AOC 222) in the vicinity of Building 222 on base. This work was conducted to address contamination identified during a previous evaluation of a release from an underground storage tank associated with Building 229. That contamination appeared to be attributable to previous operations on base and not to a release from the underground storage tank.

The Agency has reviewed the updated report and is providing the following comments generated during that review.

- 1) **Executive Summary** – The first bulleted item states that in present soil samples only B222J had detectable levels of PCE present at concentrations in excess of the soil remediation objective. This is incorrect. While there were a number of samples (5) with PCE detections, none of them were in exceedance of the most conservative soil remediation objective. This applies in Section 5.0 as well.
- 2) **Executive Summary** – The next to last paragraph states that the contaminants in the soil are unlikely to present significant environmental concern. Illinois EPA cannot agree with that assumption. There are a number of exceedances that may pose unacceptable risks to current and/or future receptors. Without complete delineation of the identified soil contamination, a proper determination of the groundwater classification, and a risk assessment, the risks to human health and the environment cannot be ascertained. This would apply to Section 5.0 as well.
- 3) **Executive Summary** – The last paragraph requests a No Further Remediation Letter for this site and mentions the implementation of land use controls. Illinois EPA cannot agree to this request. An NFR

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 (312)814-6026

would not be applicable to this site as it is not in the appropriate program to receive such a letter. In addition, implementing land use controls would be tantamount to selecting a remedy. This site is at the Site Inspection phase and selection of a remedy would be premature. As noted above, the Agency believes further investigation is warranted. This would apply to Section 5.0 as well.

- 4) **Section 2.5** – As before, a justification for a Class II Groundwater determination is made here. However, although groundwater samples were collected for analysis, there was no site-specific data collected in order to determine the hydraulic conductivity of the aquifer. Instead, reference is made to a regional document which identifies the potential for contamination of shallow aquifers based on generic area-wide data and to an approximation of the hydraulic conductivity based on the observed recovery time of the wells. This remains unacceptable. A proper groundwater classification must be based upon site-specific data.
- 5) **Section 5.0** – It states in the last paragraph under soil that, “No clear pattern of impacts is identifiable and that it is anticipated that contaminants are likely related to the various fill materials encountered at the site.” While that may be true, the contamination may well be related to past uses of the site, which included an incinerator, a foundry, firing ranges, a transformer storage area, and a pesticide storage location. The lack of a pattern to the impacts might have been caused by the numerous changes in site usage.
- 6) **Section 5.0** – The last few paragraphs discuss land use controls that are or would be put in place to close out this site. As noted above, selecting a remedy at this stage of the investigation is inappropriate. In addition, it is stated that there are soil lead exceedances of the industrial/commercial exposure route. The proposed land use controls would not properly address these exceedances/exposure pathways.

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.

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
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

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cc: Owen Thompson, USEPA (SR-6J)