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NSTC GREAT LAKES
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U S NAVY RESPONSE TO U S EPA COMMENTS ON DRAFT FINAL ACTION
MEMORANDUM TIME CRITICAL REMOVAL ACTION FOR TSA RANGES SITE NS GREAT
LAKES IL
10/24/2012
U S EPA

Responses to the October 24, 2012 Illinois EPA Comments on the Draft Final Action Memorandum Time Critical Removal Action for TSA Ranges Site Naval Station Great Lakes, Great Lakes, Illinois

Bold and italic text indicates an addition. Stricken text indicates a deletion.

Specific Comments

1. **Comment:** Title Page – This Action Memorandum (AM) identifies the removal action as being time-critical. Please explain why that is the case. The AM should provide that justification as well.

Response: Agreed. This removal action is identified as time-critical because of the potential for soil/contaminant exposure risk for short-term recreational users of the site (camping) and longer term summer residents of the recreational vehicle (RV) park. This designation also helps allow completion of the removal action prior to the peak season for the park’s use. The following sentence has been added to Section 1.0, paragraph 1.

“This soil removal action is identified as time critical because observed releases of contaminants from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health.”

2. **Comment:** Section 1.0 – The second bullet item should identify what the “specified land use” is.

Response: Agreed. Bullet 2 has been revised as follows.

“Ensure that the TSA Ranges Site is safe for the ~~specified land use~~ as a recreational vehicle (RV) park and camp ground, and for potential future residential use.

3. **Comment:** Section 2.1 – Although rather obvious, the Site Description should describe all possible migration pathways of the affected media.

Response: Agreed. Section 2.1 has been revised to include the following sentences.

“The site topography was leveled on the western portion of the site prior to the installation of the RV park but slopes moderately to the east towards Lake Michigan. Possible migration pathways for contaminated surface and subsurface soils include erosion into Lake Michigan along the coast line. In addition, contaminants may migrate via leaching from surface and subsurface soil into shallow groundwater which discharges to surface water due to the sites close proximity to Lake Michigan.”

4. **Comment:** Section 2.3 – The exposure pathways that were determined to be the risk drivers should be identified here.

Response: Agreed. Section 2.3 has been revised as follows.

*“In September 2011, Tetra Tech conducted additional SI sampling activities as part of a Supplemental Site Inspection (SSI). In order to support the final site recommendations, the collected data were used to approximate the extent of soils contaminated with lead and PAHs, and to assess the potential hazards posed by MC remaining at the site. **The SSI identified human receptors as Navy personnel, construction workers, recreational users, or authorized visitors. Ecological receptors were limited to soil invertebrates, small mammals, and birds based on the poor quality habitat at the site. Complete exposure pathways for surface soil were identified for all human and ecological receptors at the TSA Ranges site via all exposure routes [i.e., dermal contact, inhalation of dust, and ingestion (via hand to mouth behavior for humans and via foraging or feeding for biota in surface soil)]. In subsurface soil, there is also a potentially complete pathway for construction workers and a complete pathway for potential future residents. Because there is no groundwater use on site, an exposure pathway is potentially complete for construction workers only (ingestion, dermal contact).** A soil removal action was recommended for the TSA Ranges Site in the SI Addendum report (Tetra Tech, 2012).”*

5. **Comment:** Section 4.0 – As above, the exposure pathways of concern should be listed here.

Response: Agreed. Section 4.0 has been revised to include the following sentences.

“In addition, complete exposure pathways for surface soil were identified for all human and ecological receptors via all exposure routes [i.e., dermal contact, inhalation of dust, and ingestion (via hand to mouth behavior for humans and via foraging or feeding for biota in surface soil)]. In subsurface soil, a potentially complete exposure pathway exists for construction workers and a complete pathway exists for potential future residents. Since groundwater is not used for onsite, a potentially complete exposure pathway only exists for construction workers.”

6. **Comment:** Section 5.0 – This section needs to state clearly the Navy’s intent to comply with the off-site disposal rule.

Response: Agreed. The following sentence has been added to Section 5.1.5, paragraph 2.

“All material disposed of off-site will be disposed of as specified in Illinois EPA environmental regulation Title 35 of the Illinois Administrative Code (Part 722, subpart C).”

7. **Comment:** Section 5.0 – There needs to be a section discussing the estimated costs of the removal action.

Response: Agreed. Section 5.1.4 has been revised as follows.

“An Engineering Evaluation/Cost Analysis (EE/CA) is not required for a time-critical removal action. **However, the estimated cost for the recommended removal action is approximately \$814,125.**”

8. **Comment:** Section 6.0 – The potential for the contamination to migrate to Lake Michigan if not removed should be discussed here.

Response: Agreed. Section 6.0 has been revised as follows

“If no action is taken or the action is delayed, the lead and PAH-contaminated soil at the TSA Ranges Site will continue to pose a potential threat to human health. The potential for direct contact with contaminants and the threat of migration of contaminants from the site **into Lake Michigan via erosional processes** will remain.”

9. **Comment:** Section 9.0 – There should be a space for the signature and date for whomever will be the signatory for this document.

Response: Agreed. A signatory page has been added to the document following the title page which reads as follows.

This Action Memorandum documents the time-critical removal action to be conducted under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 40 Code of Federal Regulations (CFR) 300.415, for a Removal Action at TSA Ranges at Naval Training Center (NTC) Great Lakes, Great Lakes, Illinois.

Approved: _____ Date: _____

CDR Mike Crafts
NAVSTA Great Lakes Public Works Officer