

**RESPONSE TO COMMENTS
ILLINOIS EPA REVIEW
JUNE, 2009
SITES 1 and 4 PROPOSED PLAN
NAVAL STATION GREAT LAKES**

The following provides responses to comments made by Illinois EPA in a March 30, 2009 letter to Mr. Howard Hickey regarding the Draft Proposed Plan for Site 1 – Golf Course Landfill and Site 4 – Fire Fighting Training Unit located at Naval Station Great Lakes.

- 1) **About This Document** – Here and throughout the submittal, the actual dates for the public comment period will need to be provided once they have been determined.

Response: *The appropriate dates will be added once they are determined.*

- 2) **Site Description** – The estimated quantities of material to be addressed by the proposed remedy needs to be provided here.

Response: *The following statement has been added to this section: “An estimated 1.5 million tons of waste were disposed of at Site 1 via a trench and fill operation. Once in the trench the waste was burned and then covered with soil. It is estimated that 1.0 million cubic yards of impacted material remains covered within the landfill’s 50 acre foot print.”*

- 3) **Summary of Site Risks** – This section needs to provide a more detailed description of the potentially exposed populations in the current and future risk scenarios (e.g. site workers, future residents living on the site, golfers, etc...).

Response: *The following statement has been added to this section: “Under current land use scenarios the potential exposed population included maintenance workers, trespassers, and recreational users such as golfers. Future use scenarios considered the same population but also considered site residents under the unlikely premise that the site would be developed for residential use.”*

- 4) **Why is Remedial Action Needed?** – The landfill closure requirements should also be listed here.

Response: *The following bullet item has been added to this section. This along with the additions related to Comment 5 should address this comment:*

- ▶ *As defined by Title 35 of the Illinois Administrative Code, several standards must be met to close the landfill in accordance with the applicable regulations.*

- 5) **Remedial Action Objectives** – When discussing the Applicable or Relevant and Appropriate Requirements (ARARs), the landfill closure requirements should be included as a separate bullet item.

Response: *The following statement and bullet items have been added to this section:*

- ▶ *Comply with Illinois EPA landfill closure requirements.*

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- 6) **A Closer Look at the Proposed Remedial Action** - It should state here under Component 2 that a Land Use Control Implementation Plan (LUCIP) for this site will be appended to the Land Use Control Memorandum of Agreement (LUCMOA) between the Navy and Illinois EPA to ensure the restrictions will be applied and enforced until they are no longer required.

Response: *The following statement has been added to this section: “A Land Use Control Implementation Plan (LUCIP) for Sites 1 and 4 will be appended to the LUCMOA to ensure restrictions will be applied and enforced until they are no longer needed. ”*

- 7) **General Comment** – The Proposed Plan mentions that land use will be restricted to non-residential use. However, it does not discuss what the anticipated future land use will be and whether it will be compatible with the proposed alternative. It is assumed that the site will remain a golf course, but the plan makes no mention of the golf course at all, other than to state that the site is currently within the current limits of the course. Suggest the plan be revised to include such discussion.

Response: *The following statement has been added to the section titled, “A Closer Look at the Proposed Remedial Action”:* *“The future land use is anticipated to remain the same as the current land use, a golf course, making Alternative 2 compatible with the land use.”*

- 8) **General Comment** – The plan needs a concluding summary statement by the Navy similar to:

“Based on information currently available, the lead agency believes the Preferred Alternative meets the threshold criteria and provides the best balance of tradeoffs among the other alternatives with respect to the balancing and modifying criteria. The Navy expects the Preferred Alternative to satisfy the following statutory requirements of CERCLA §121(b): 1) be protective of human health and the environment; 2) comply with ARARs; 3) be cost-effective; 4) utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent possible; and 5) satisfy the preference for treatment as a principal element.”

Response: *The above statement was added to the end of the section titled, “A Closer Look at the Proposed Remedial Action”.*

Note – *other minor changes were made to the document based on comments from the Navy. All additions have been highlighted to assist with the review process.*