



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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May 24, 2010

NAVFAC Midwest IPT EV
Attn: Ms. Terese Van Donsel
Building 1A, 201 Decatur Avenue
Great Lakes, Illinois 60088-2801

Re: Draft Record of Decision for Site 1 – Golf
Course Landfill and Site 4 – Fire Fighting
Training Unit, Naval Station Great Lakes
Great Lakes, Illinois

0971255048 – Lake
Great Lakes Naval Station
Superfund/Technical

Dear Ms. Van Donsel:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's *Draft Record of Decision for Site 1 – Golf Course Landfill and Site 4 – Fire Fighting Training Unit, Naval Station Great Lakes*. It was dated May 2010 and was received via electronic mail on May 6, 2010. Hard copies of the document were received on May 11, 2010. This Record of Decision (ROD) presents the selected final remedy for addressing soil, sediment, groundwater, and surface water contamination at these sites. The Sites 1 and 4 final remedy was selected by the Navy, as the lead agency, in consultation with the Illinois EPA, the support agency, in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, Title 42 United States Code Sections (t) 9601 et seq., and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 Code of Federal Regulations 5 300, et seq. The Agency has conducted a review of the submittal and has generated the following comments.

- 1) **Section 1.1** – The first bulleted item on page 3 should state that the golf course cover equates to a landfill cap (35 Illinois Administrative Code 807) in that it consists of a minimum of 3 feet of silty-clay with a very low hydraulic conductivity.
- 2) **Section 1.1** – The second bulleted item on page 3, and elsewhere, should explain that the abandonment of the current storm sewer lines will be achieved by grouting them closed.

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- 3) **Section 2.1** – In the third paragraph on page 6, the age of the existing storm sewer should be provided, or at least an approximation, as that speaks to the cause of the pipe being in a deteriorated condition.
- 4) **Table 2-1** – Under Activities across from the 1998 Remedial Investigation, FFTU the sixth sentence is a fragment. Please revise as necessary.
- 5) **Nature and Extent of Contamination** – The last sentence prior to the bulleted items should read “...during the investigations *at* each of the sites.”
- 6) **Figure 2-5** – This figure is merely a blue block. There is no information shown whatsoever. Please revise to include the information intended to be shown here.
- 7) **Figure 2-6** – The text in the figure is difficult to read. Suggest enlarging the figure to make the wording more legible.
- 8) **Table 2-2** – Under Groundwater in the first box, the symbol is located between lines such that it is unclear whether it is associated with the Dermal Contact line or the Ingestion line. Please relocate that symbol to whichever line is appropriate.
- 9) **Section 2.5.3** – This section should mention that action is also being taken to comply with ARARs, which include the landfill closure requirements. These can be found in the Focused Feasibility Study.
- 10) **Section 2.7** – The remedial action objectives listed here and elsewhere (Table 2-6) do not match those provided in the Proposed Plan. The objective for complying with Illinois EPA landfill closure requirements has been omitted.
- 11) **Section 2.8** – In the fourth paragraph, there is reference to “Illinois Administrative Code Title 35 Part 811.319.” The reference should be to Illinois Administrative Code Title 35 Parts 811.318-320. This should be corrected throughout the document.
- 12) **Section 2.8** – In the fourth paragraph, there is mention that land use controls in the LUC Tracker system would be transferred to the property deed should the federal government sell or otherwise relinquish ownership of the property. It should also state that pursuant to enactment of the Illinois EPA’s Uniform Environment Covenants Act, 765 ILCS 122, LUC responsibility will be documented in an Environmental Covenant that will be incorporated into the pertinent contractual and property documentation, such as a purchase agreement, deed, or lease.
- 13) **Section 2.8** – At the end of the third full paragraph on page 19, the last sentence should conclude with “...solely to assess the general condition of the groundwater *and provide*

a means for identifying any adverse impacts to the groundwater in the vicinity of Sites 1 and 4.”

- 14) **Section 2.9.1** – Another reason for choosing the selected remedy is to properly close out this landfill in accordance with Illinois’ landfill closure regulations. This would be considered a principal factor in selection of the remedy.
- 15) **Section 2.9.2** – As above in the first comment, it should clearly state that the containment portion of the remedy is a landfill cap, in accordance with the presumptive remedy for municipal landfills.
- 16) **Section 2.9.2** – In the fourth line of the first full paragraph on page 22, the word sediment is repeated. One usage should be removed.
- 17) **Section 2.9.2** – Another performance objective should be to maintain the landfill cap as already installed, which provides a minimum of 3 feet of clay above the waste material.
- 18) **Section 2.9.4** – The last sentence under Protection of Human Health and the Environment, should conclude with “...by verifying that the landfill cover is in place *and COCs are not migrating from the capped areas.*”
- 19) **Section 2.9.4** – Under Implementability, the second sentence is a fragment.
- 20) **List of Acronyms and Abbreviations** – The definition of PPE should be personal protective *equipment*.
- 21) **List of Acronyms and Abbreviations** – The definition of RI should be remedial investigation.
- 22) **General Comment** – Somewhere within the ROD the planned sequence of actions should be presented.
- 23) **General Comment** – The ROD needs to discuss the current adjacent/surrounding land uses, as well as, the future uses, if known.
- 24) **General Comment** – Although, there is a link provided in Section 2.9.4 to the Focused Feasibility Study to view the ARARs, those ARARs should be provided within this document as well.
- 25) **General Comment** – The ROD repeatedly mentions the replacement of the Skokie Ditch storm sewer infrastructure, with the abandonment of the existing lines. However, nowhere does it discuss the actual location of the replacement sewer line, except to state that it will be located outside the landfill, nor is it shown on any of the figures. Since it is considered part of the selected remedy, it must be discussed and its location shown on

one of the figures. Additionally, the riprap to be placed just north of Buckley Road is not shown on a figure either.

- 26) **General Comment** – There was little to no mention of ongoing operations and maintenance (O & M) for the selected remedy, the landfill cap. O & M will be required to ensure the cap remains protective of human health and the environment and should be discussed within this Record of Decision. (It is included only briefly in Table 2-5 under the Cost heading.)
- 27) **General Comment** – There are several typographical errors within the document that need to be corrected. Suggest someone proof read the document with this in mind.

If you have any questions regarding anything in this letter or require any 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
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

BAC:  fac:H\GLNTC\WGGCLF\Site1RODrww

cc: Biff Cummings, Tetra Tech NUS, Inc.

Owen Thompson, USEPA (SR-6J)