



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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March 7, 2005

Department of the Navy
EFA Midwest
c/o William Busko
Environmental Department
201 Decatur Avenue
Great Lakes, Illinois 60088-5600

Re: Proposed Plan to Install Geo-Fabric
Material and Additional Landfill Cover
On Supplside and Forrestal Landfills

0971255048 – Lake County
Naval Station, Great Lakes
Superfund/Technical Reports

Dear Mr. Busko:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the letter dated February 15, 2005 regarding the above-listed item. It was received on February 22, 2005. Illinois EPA has reviewed this submittal and has determined the following:

First, it was unfortunate that the topsoil source turned out to be contaminated with the transite-type material, an asbestos-containing material (ACM). It was even less fortunate that it was only identified after so much of it had already been placed on the landfills. While this situation should have been identified during the analysis of the topsoil source prior to its use, it is not in anyone's best interest to delay implementation of the corrective action, which would eliminate the current risks to human health and the environment, any more than is necessary. Illinois EPA does appreciate the Navy's timely efforts to notify the Agency of the situation, to take the necessary measures to protect the workers in the area, and to comply with the regulations cited to them as being appropriate to this situation. We also appreciate the Navy's willingness to provide additional information upon request.

There appear to be three corrective action alternatives to the situation at hand; first, the entirety of the contaminated topsoil (the stockpile and the already-placed topsoil) could be removed and disposed of in a properly permitted facility. Second, the topsoil in the current stockpile could be removed and disposed of appropriately, and the already-placed topsoil covered as described in your letter. Or third, the procedures described in your letter could be implemented as proposed. That would entail completing placement of the remaining ACM-contaminated topsoil prior to covering both landfills with the geo-fabric and additional topsoil and vegetative layer. It would also include the installation of warning signs, the appropriate Land Use Controls be placed on the property, and both sites be added to the Navy's Land Use Control Memorandum of Agreement with Illinois EPA.

Proposed Plan to Install Geo-Fabric and
Additional Topsoil Letter Review
Naval Station, Great Lakes
March 7, 2005
Page 2 of 2

After consulting with the appropriate units within Illinois EPA and discussing the Navy's situation with management, the Agency has come to a decision. Illinois EPA has decided to concur with the Navy's proposal as written in the above-referenced letter. However, there are several items that will need clarification and/or additional information be provided.

First, a detailed description of the specific type of geo-fabric needs to be provided for review. Illinois EPA would like to ensure that the side-slopes will be stable, the vegetative layer will be compatible with it, and the moisture capacity of the entire protective layer, both in trapping moisture to sustain the vegetation and in flow over and from that layer, are considered. The root system of the vegetative layer will also need to be considered. Illinois EPA believes a material that will allow water and roots to move through the fabric is preferable to one that totally impedes those processes.

Second, the protection of the site workers needs to be taken into account. During implementation of the proposed remedy those workers will need to be informed of the potentially hazardous situation and don the proper personal protection equipment to allow them to work safely in the potentially hazardous ACM now known to be present.

Illinois EPA's Project Manager for Naval Station, Great Lakes is willing to sit down with the Navy to discuss this matter further if there are any other concerns regarding the proposed plan for those two landfills.

If you have any questions regarding anything in this correspondence, you may contact me at (217) 557-8155 or via electronic mail at Brian.Conrath@epa.state.il.us.

Sincerely,

Brian A. Conrath

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

BAC:p [initials] RAC:H:glntc\Forrestal\F\ACMsoilltr

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