



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SRF-5J

Thursday, 10 July 1997

Mr. J.P. Messier
Department of the Navy
Engineering Field Activities
Midwest Code 930
Naval Facilities Engineering Command, Bldg. 1-A
2703 Sheridan Road, Suite #120
Great Lakes, Illinois 60088-5600

Re: Review of the Work Plan for Limited Demolition Services Fire Fighting Training Unit Facility - Great Lakes Naval Training Center, Great Lakes, Illinois.

Dear Mr. Messier:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act and Executive Order 12088, the U.S. EPA has reviewed the above referenced document for the Naval Training Center, Great Lakes, Illinois. We reviewed the document to ensure that the limited demolition services would be in accordance with appropriate federal regulations.

U.S. EPA has the following comments which should be considered and addressed prior to commencing demolition activities:

- 1) Page 4, Section 2.0, Site Description - The paragraph indicating that U.S.EPA Region 5 regulates activities at the site due to the potentially hazardous concentrations of CERCLA compounds associated with the combustion of fuels is inaccurate. U.S. EPA Region 5 regulates activities at the site due to the potentially hazardous concentrations of compounds associated to past management and disposal activities associated with the site.

This section also indicates that free product encountered will be collected, containerized and disposed. Please specify that this free product will be sampled, handled and disposed of in accordance with Federal and State regulations.

- 2) Page 5, Section 3.1, Remove Aboveground Storage Tanks - This section indicates all liquid contents and wash water or solids, as well as the tanks, concrete slabs and cradles, pipes, dikes, signage, and accessory items will be cleaned, containerized and disposed. Please specify that all liquid contents, wash water or solids, as well as the tanks, concrete slabs and cradles, pipes, dikes, signage, and accessory items will be sampled, handled and disposed of in accordance with Federal and State regulations.
- 3) Page 6, Section 3.4, Prepare Laydown Areas and Decontamination Areas - This section establishes two laydown areas for piping and associated demolition debris. U.S. EPA does not necessarily agree with handling the two areas differently. With respect to the laydown areas, these areas may be subject to RCRA technical storage requirements for waste piles, 40 CFR 264 Subpart L and 265 Subpart L. Attached to this letter is a Guide to Management of Investigation-Derived Wastes, Publication : 9345.3-03FS, January 1992. This guide should help in revision of this document with respect to investigation-derived wastes as well as demolition debris. It should be noted that U.S. EPA doesn't necessarily regulate piping. U.S. EPA regulates releases or substantial threats of releases of hazardous substances into the environment, and releases or substantial threats of releases of pollutants or contaminants which may present an imminent or substantial danger to public health or the environment. This is specified in 40 CFR 300.
- 4) Page 7, Section 3.5, Demolish Oil Water Separator System and Related Subsurface Structures - It would be appropriate to modify the last statement to: "The Contractor is responsible to sample, handle and dispose of wastes in accordance with Federal and State regulations."

In the event that dewatering is necessary, the Guide to Management of Investigation-Derived Wastes should be consulted and the text should be modified accordingly. Depending upon sampling results, it may not be appropriate to pump groundwater to the former decant pond.

- 5) Page 8, Section 3.6, Site Drainage - It should be noted that the quality of containerized water may be required to comply with Clean Water Act Federal, State and local requirements.
- 6) Page 9, Section 3.7, Remove Underground Storage Tank - It would be appropriate to specify that the sludges from the tank, rinseate water, and the tank itself will be sampled, handled and disposed of in accordance with Federal and State regulations.

Thank you for the opportunity to provide comments on this document. If you have any questions, please contact me: (312) 886-0850.

Sincerely,

Laura J. Ripley

Laura J. Ripley

Federal Facilities Project Manager

cc: Donald Harrison, IEPA
Molly Arp, Beling Consultants
Section File