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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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RENEE CIPRIANO, DIRECTOR

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April 15, 2002

Commander, Southern Division
Naval Facilities Engineering Command
Attn: Mr. Anthony Robinson
2155 Eagle Drive
North Charleston, South Carolina 29406

Re: Draft Remedial Investigation and Risk
Assessment Report Site 7 – RTC Silk
Screen Shop

0971255048 – Lake
Great Lakes Naval Station
Superfund/Technical

Dear Mr. Robinson:

The Illinois Environmental Protection Agency (Illinois EPA) is in receipt of the Draft Remedial Investigation and Risk Assessment Report, Site 7 – RTC Silk Screen from Tetra Tech NUS, Inc. It was dated March 2002, and received at Illinois EPA on March 15, 2002. The Agency has reviewed the document and has the following comments:

- 1) Executive Summary – It is stated here and in other places (Sections 7.3.2, 7.4, 8.0 etc...) that, in regards to the groundwater, “Considerable dilution of chemical concentrations in the groundwater at Site 7 is expected to occur before discharge to the nearby ditch or Pettibone Creek.” Has any modeling or calculation been completed to determine this would be the case or is this just an assumption? If modeling was performed, that data should be included in this report. If this is an assumption, these statements should be removed or additional text added to clarify their derivation.
- 2) Executive Summary – It is stated here and in other sections that the Site 7 area is 100% paved. Illinois EPA believed the soil borings and monitoring wells installed furthest east (MW/SB05, MW/SB06, MW/SB07) were located in the ditch across the road (Ohio Street), which is not paved. Therefore, these statements should be corrected.
- 3) Executive Summary - Illinois EPA suggests rewording the last two sentences as follows: *Based on the results of this RI/RA, no further investigation or remedial action is warranted at this site. The Record of Decision for this site will state that No Further Action is necessary, provided a Land Use Control (LUC) is applied to insure the site remains Industrial/Commercial in use.*

GEORGE H. RYAN, GOVERNOR

- 4) Section 2.1.2 – In the second line on page 2-2, the units following the number 20 are missing. Please insert.
- 5) Section 2.1.2 – In the third line on page 2-2, RCC should be RTC.
- 6) Section 2.1.2 – In the sixth line on page 2-2, the word are should be area.
- 7) Section 2.3.2 - It is stated that the sample location is shown on Figure 2-2. However, the sample location is not identified on that figure. Please correct.
- 8) Section 3.2.2 – The sixth line should have the word “human” added prior to the word “health.”
- 9) Section 3.2.8 – The third sentence in the second paragraph does not make sense. Please re-write this sentence.
- 10) Section 3.2.9.4 – The acronym FOL should be defined the first time it is used. Please correct.
- 11) Figure 3-3 – For the cross-section, it should go from A to A'. The apostrophe is missing from the second A.
- 12) Section 4.0 – In the third paragraph, the definition of TACO should be Tiered Approach to Corrective Action *Objectives*.
- 13) Section 4.3.1 – In the last paragraph, it states that SW-846 method 6010B can produce false positive results for thallium and other metals because of interferences. What is the reference for this statement? Please clarify.
- 14) Section 4.3.3, SVOCs – The last sentence in this section applies to most of the subsurface samples, but does not apply to the sample from soil boring NTC07SB12. This should be clarified. Additionally, the more likely source for the contamination found in this boring, NTC07SB12, is a release from the aboveground storage tanks (ASTs) previously stored in that area.
- 15) Section 6.5.1.1, Existing Databases – The data were collected as part of a CERCLA Remedial Investigation (RI) rather than a RCRA Facility Investigation were they not? Please correct.
- 16) Section 6.6 – The ILCR risk values in the last few paragraphs of this section are stated to be in the USEPA risk management range of 1×10^{-6} to 1×10^{-4} . Please state the calculated ILCR value here followed by the USEPA risk management range. This presents a better picture of where the calculated value fits into the risk range, near the upper or lower end of the range.
- 17) Table 6-18 – The word “reasonable” is misspelled in the title.

- 18) Section 8.0, Sixth Bullet – See comment number 14 above.
- 19) Section 8.0 – See comment number 3 above.
- 20) Appendix A-10 – The Chain of Custody Forms have not been received by signatures. Were they not signed as having been received? Please submit the fully signed versions of these forms in the final version of this document.
- 21) General – Given that the risk driver responsible for the majority of the risk involved with this site is Benzo(a)Pyrene and several other polynuclear aromatic hydrocarbons (PAHs) in the immediate vicinity of the former ASTs, has any thought been given to performing a limited removal in that specific area? This would remove most of the higher-level residues of those PAHs and thereby possibly reduce the cancer risk to below the unrestricted use level (1×10^{-6}). (That calculation has not been performed, but it is assumed that would be the case.) This would allow the state to concur with a No Further Action Decision with no LUCs or restrictions whatsoever.
- 22) General – The document has a significant amount of typographical errors in the text. Please conduct a more thorough proof/review prior to submittal.

If you have any questions or require additional information, please contact me at (217) 557-8155 or by 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:PC/A/T/H/GIntc/site7ri.rvw

cc: Owen Thompson, USEPA (HSRL-5J)
Bob Davis, Tetra Tech NUS, Inc.
Mark Shultz, US Navy - EFA Midwest