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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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April 28, 2003

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

Re: Draft Record of Decision Site 7, RTC Silk Screening Shop, Naval Training Center Great Lakes Great Lakes, Illinois

0971255048 – Lake
Great Lakes Naval Station
Superfund/Technical

Dear Mr. Robinson:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Draft Record of Decision Site 7, RTC Silk Screening Shop. It was dated November 2002, and received on November 13, 2002. The Agency has reviewed the document and has the following comments.

1) **Acronyms and Abbreviations Section** – The Agency would prefer its acronym be *Illinois EPA*, rather than IEPA.

2) **Section 1.2, Statement of Basis and Purpose** – Please change "state of Illinois" to "Illinois Environmental Protection Agency (Illinois EPA)."

3) **Section 1.2, Statement of Basis and Purpose** – Since the USEPA has not been actively involved with this study site, it should not be stated that they concur with the selected remedy. To be more accurate, that sentence should state that the USEPA defers remedial oversight and concurrence with remedial alternatives at Great Lakes Naval Training Center to the Illinois EPA. It might be prudent to contact Mr. Owen Thompson, at USEPA HQ, for his opinion for the proper wording.

4) **Section 1.3, Assessment of Site** – Similar to the Proposed Plan, this statement should read, "Based on a Remedial Investigation/Risk Assessment (RI/RA) evaluation of current conditions and a removal action for polynuclear aromatic hydrocarbons (PAH)-contaminated soil, no pathways pose a threat to human health or the environment."

5) **Section 1.4, Description of the Selected Remedy** – Please remove the first sentence, as it does not belong in this section.

6) **Section 1.4, Description of the Selected Remedy** – This section should state that no CERCLA remedial action is necessary for this site.

7) **Section 1.5, Statutory Determinations** – This section should state that it has been determined that no remedial action is necessary at this site and it should explain that the previous response action at this site eliminated the need to conduct further remedial action. It should also note that no five-year review will be required.

8) **Section 1.6, Authorizing Signatures** - Please remove Brian Conrath from this page and replace with *Renee Cipriano, Director, Illinois Environmental Protection Agency*. Agency policy dictates that the Director of Illinois EPA must sign all Decision Documents.

9) **Section 2.1, Site Name, Location, and Description** – The beginning of the fourth paragraph lists the approximate size of Site 7 as 250 feet. This should be approximately 4000 square feet, as was corrected in the Proposed Plan. Also, the word "cover" should be "covers."

10) **Section 2.1, Site Name, Location, and Description** – The last sentence states the topography is relatively flat, but then lists the elevation as being between 640 and 660 feet above mean sea level. This statement is misleading. It leads one to believe that there is as much as a 20-foot change in elevation within the Site 7 area. This is not the case. That statement should be reworded to more clearly present the actual site elevations, which probably do not vary by more than a few feet.

11) **Section 2.2, Site History and enforcement Activities** – The last sentence in this section should state, "Some of the contaminated soil in the area was removed *at that time, but the actual soil volume of that removal was not specified.*"

12) **Section 2.3, Highlights of Community Participation** – This section should be amended to read as follows: "A Community Involvement Plan (CIP) was not developed for NTC Great Lakes because *the* removal action was *triggered by the PAH-contaminated soil from the* petroleum spill, and petroleum and petroleum-related products do not fall under the jurisdiction of CERCLA. Therefore, a public meeting was not necessary. However, a Proposed Plan for this No-Action Record of Decision was drafted and made available to the public for their input. See Section 3.0 for details relating to comments received on the Proposed Plan." This could vary based on comments received during the public comment period.

13) **Section 2.4, Scope and Role of Action** – The fourth sentence should read, "In 2001, a RI/RA was conducted at Site 7 and concluded that *no pathways pose a threat to public health or the environment, indicating that no further remediation is necessary at this site.*"

14) **Section 2.4, Scope and Role of Action** – The final sentence in this section states that the selected final remedy is "no further action". We feel it is important to also state that this remedy was selected following a hot spot removal. Technically, all RODs will conclude with the recommendation of no further action (with the exception of continued monitoring) since sites are only closed when cleanup and remedial actions are complete and no additional activities are planned. To simply state that the <u>remedy</u> is no further action is misleading and ignores the fact that specific, focused cleanup activities have taken place.

15) **Section 2.5.1, Geology** – Please remove the word "it" from the last sentence of the second paragraph.

16) **Section 2.5.3.2, Semivolatile Organic Compounds – Soil** – Suggest replacing the word "is" with "are" in the last sentence to be grammatically correct.

17) **Section 2.5.3.3, Inorganics – Soil** – In the middle of the first paragraph, suggest changing the word "most" to "the majority of".

18) **Section 2.5.3.3, Inorganics – Soil** – The last sentence in the first paragraph refers to alternative screening criteria for lead. It appears that the alternative methodology was to average (95% UCL) the environmental lead data and to include this average in the IEUBK blood lead model. The IEUBK model is the same model used to derive the 400 mg/kg remediation objective for lead thus it cannot be characterized as an alternative method. Furthermore, running the IEUBK model was unnecessary since the average lead concentration was below the remediation objective thus removing lead from consideration as a COPC for all but the construction worker receptor.

19) **Section 2.5.3.3, Inorganics – Soil** – In the second sentence of the second paragraph, the word "collected" is unnecessary and should be removed. The third sentence in this paragraph is a fragment and it is incomplete. It is ambiguous to state "IEPA TACO Tier GROs". It should be stated that Tier 1 GROs were used if both classes of groundwater were considered or Class 1 or Class 2 should be reported if the comparison was to a specific class of groundwater.

20) **Section 2.5.3.5, Inorganics – Groundwater** – The third sentence should state why the thallium positive results might be considered false positives.

21) **Section 2.5.3.5, Inorganics – Groundwater** – In the last sentence, the words "a strictly risk-based criterion" should be set apart by commas.

22) **Section 2.5.3.5, Inorganics – Groundwater** – The last sentence in this paragraph characterizes the IEPA TACO Tier 1 GRO for manganese as incorporating concerns for "...aesthetics as well as human health risk considerations." The TACO GRO for manganese is 150 μg/L and the federal EPA secondary MCL for aesthetic consequences is 50 μg/L. It makes little sense to state that an aesthetic-based objective will be increased to incorporate added concerns for potential health impacts. Actually, the IEPA GRO for manganese is a state maximum allowable concentration (MAC) carryover that originated from an agency/industry compromise.

23) **Section 2.5.3.6, Surface Water** - The first sentence in this paragraph should be revised to read "One or more analytical groundwater results..."

24) **Section 2.6, Summary of Site Risks** – The fourth sentence references Figure 2-4. There is no Figure 2-4 included in this document. Please include the referenced figure.

25) **Section 2.6, Summary of Site Risks** – In the second sentence of the third paragraph, it states, "...one-in-one million and one-in-ten thousand chance ..., respectively." These are reversed with respect to the order listed previously that is being referenced.

26) **Section 2.6, Summary of Site Risks** – The last sentence in the third paragraph should be clarified as being stated only for reference purposes. TACO is not an ARAR at this site and the no further remediation decision was not based upon, nor does it meet TACO Tier I decision guidelines. That decision was made under CERCLA authority and was based on the risk values being at the low end of the USEPA risk management range.

27) **Section 2.6, Summary of Site Risks** – In the first paragraph on page 2-8, suggest adding statements to mention that groundwater at the site was also not evaluated due to the abundant source of drinking water found immediately adjacent to the site (Lake Michigan) and that the only contaminants above remediation objectives found in the groundwater samples were a few inorganic constituents that did not appear to be related to the identified sources at this site.

28) **Section 2.6, Summary of Site Risks, Page 2-8, second paragraph** – This paragraph includes calculated theoretical increased cancer risk levels hypothesized from the presence of carcinogenic chemicals in the soil. These risks were also calculated in the RI/RA for this site. The risk values do not agree. The differences are due to the inclusion of cancer risks for all carcinogenic chemicals in the RI/RA and only two chemicals in the ROD. We feel it is unwise to modify the cancer risks for presentation in the ROD. Please correct the values listed in the ROD to match those in the RI/RA. If the intent was to show the proportion of the total risk attributed to only those two chemicals, that may also be presented for comparison, in addition to the total risk values.

    The sixth sentence in the second paragraph states that the information in Tables 2-6 through 2-9 shows that two chemicals were the main risk drivers at this site. These tables cannot show this to be true. Only the two problematic chemicals are presented in these tables making comparisons to determine their relative contribution to total risk impossible. Please include the complete risk tables as well, so that comparisons of relative contribution can be made.

29) **Section 2.6, Summary of Site Risks** – In the third paragraph on page 2-8, the chemicals driving the added hazard at this site and their respective calculated hazard quotient and total hazard indices should be listed.

30) **Section 2.6, Summary of Site Risks** – In the fifth paragraph on page 2-8, the second sentence should mention the groundwater modeling performed in support of the presumption that contaminants are diluted prior to reaching the ditch or Pettibone Creek.

31) **Section 2.7, Documentation of Significant Changes** – The statement in this section is incorrect and should be deleted. Provided there are no changes to the Proposed Plan, a statement to that effect should be made here.

32) **Section 3.0 and 3.1** – These sections discuss the Proposed Plan and the public comment period and public comments that could have been associated with it. They assert that there was no Proposed Plan and therefore no public comments. However, since drafting of this document, the Navy decided to produce a Proposed Plan and did provide for the associated public comment period. These sections need to be updated to provide the relevant information regarding the Proposed Plan, the public comment period, and any comments provided by the public.

33) **Section 3.2** – This section may require amending if public comments are submitted.

34) **Table 2-4** - The title for this table is misleading since many more than two chemicals were identified as chemicals of concern at this site.

35) **References** – Shouldn't the reference for the Site 7 RI/RA be separate from the Site 17 RI/RA, since they are two separate reports?

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

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