



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-2829
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

DOUGLAS P. SCOTT, DIRECTOR

(217) 557-8155
(FAX) 782-3258

March 2, 2009

Engineering Field Activity, Midwest
Attn: Mr. Howard Hickey
Building 1A, Code 931
201 Decatur Avenue
Great Lakes, Illinois 60088-5600

Re: Sampling and Analysis Plan for the
Remedial Investigation/Risk Assessment
Site 19 - Small Arms Range 910, Naval
Station Great Lakes, Great Lakes, Illinois

0971255048 - Lake
Great Lakes Naval Station
Superfund/Technical

Dear Mr. Hickey:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's responses to Illinois EPA's follow-up comments regarding the Sampling and Analysis Plan for the Remedial Investigation/Risk Assessment Site 19 - Small Arms Range 910, Naval Station Great Lakes, Great Lakes, Illinois. They were received via electronic mail on February 6, 2009. The Agency has reviewed the Navy's responses and those responses were deemed acceptable. A single follow on comment is provided for future use, but does not require an official response at this time.

Regarding the original Comment #12 and the follow-up comment, the Agency finds the Navy's response to be unacceptable. Our comment regarding the null hypothesis was not completely addressed in this response. To repeat, the null hypothesis should be restated to reflect baseline conditions. Site history suggests that baseline conditions include the likelihood that certain contaminants are above threshold levels. On page 16 of the Sampling and Analysis Plan document, we are told that, "Soil contamination associated with this facility has been documented..." Past activities at Site 19 suggest that unrestricted contaminant releases have taken place. The RI/FS is designed to determine the degree and extent of these long-term releases. The baseline condition for Site 19 favors the likelihood that it is contaminated and the null hypothesis should reflect this assumption.

The portion of the response relating to the statistical decision error rates is also unacceptable. We request use of more protective error rates. On page 56 of current DQO guidance, USEPA

recommends 0.01 as the starting point for both the false rejection and false acceptance error limits (*Guidance on Systematic Planning Using the Data Quality Objectives Process, EPA QA/G-4*, February 2006, USEPA, Office of Environmental Information, Washington, DC, EPA/240/B-06/001). The IEPA realizes that, in many cases, these criteria are too stringent. When advising on this topic, the IEPA parrots the recommendations of the USEPA Office of Solid Waste and Emergency Response as presented in the *Supplemental Guidance for Developing Soil Screening Levels for Superfund Sites* guidance document and suggest a false rejection rate of 5% and a false acceptance rate of no more than 20%.

However, given the willingness of the Navy to make adjustments in the field as necessary, and that such adjustments have already been made at this site, the Agency is willing to overlook the differences between our positions in stating the null hypothesis and the decision error rates used for the false rejection and false acceptance error limits for this site. Illinois EPA is comfortable with the number and location of soil samples collected at Site 19 and believes the proper remedial decisions can and will be made. Therefore, Illinois EPA can now concur with the contents of the submittal as written. As requested, Agency personnel have signed the appropriate page and are herein returning said page for inclusion in the final document.

In the future, Illinois EPA suggests following the guidance documents listed above more closely when working through these same steps of the process at other sites so that everyone is on the same page at the outset. (The Agency realizes this issue was likely caused by miscommunication early on and will strive to ensure all future work plans do not replicate this oversight.)

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.

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: Bob Davis, Tetra Tech NUS, Inc.

Owen Thompson, USEPA (SR-6J)