

U.S. Navy Comments to Temporary Well Interim Report, Building 105

General Comments:

1. This document and any follow-on documents need to stand-alone by incorporating all pertinent information so the reviewed/reader can comprehend the entire picture. There appear to be significant gaps and missing information as delineated below.
2. There does not appear to be any mention of a time frame for closure under RCRA. Based on previous discussion and review of historical documents, this has been an issue and I would recommend that a brief discussion of this be include in the document to bring the reader/reviewer up to date.
3. There is no mention of what screening levels were used in this investigation or in earlier investigations.
4. Conclusions are being made based on assumptions that there is no definitive laboratory data to support. Specifically, what is the status for obtaining a groundwater classification?
5. You are making an assumption that LUCs will be the final remedial action. How has this been determined? Based on some of the hits, levels of PCE and DCE in both soil and groundwater are extremely elevated. Has a preliminary ECO/HHRA been run and determined that source removal/groundwater treatment will not be required?
6. I see no mention of migration to groundwater. Are there plans to run R-15, R-19, R-26, etc., calculations?

Specific Comments:

7. Executive Summary: You make reference to viable land use controls and environmental land use controls. What is the difference between viable land use controls and environmental land use controls? The correct terminology is identification and application of Land Use Controls (LUCs).
8. Executive Summary: There should be some mention of how the LUCs will be implemented and monitored. I realize that there will be no deed in which the restrictions can be incorporated...however, there is a means (*Memorandum of Agreement Between the Illinois Environmental Protection Agency The U.S. Environmental Protection Agency, Region 5, and the U.S. Department of Navy*: attached) to accommodate the LUCs and this should be briefly discussed.
9. Executive Summary: If there are concentrations (DCE 6,900 ug/l) that significantly exceed groundwater standards (assuming a Class II), I would have to assume that some form of LTM will be required. With this stated, how can we

‘maintain a status of “no further action” in lieu of assigning restrictions or management requirements to a property deed’?

10. Executive Summary: If only 14 temporary well points were installed, where are you going to located number 15 permanent monitoring well?
11. Section 1.0 Introduction: What date did the IEPA approve the RCRA Closure Plan?
12. Section 1.2 Previous Investigation Results: I realize that this project is to determine extent of groundwater contamination, however, there is no mention of other COC’s that may have been identified in earlier projects. Am I to assume that there were no metals or PNA’s that exceeded screening levels? If there were exceedances, then was an ECO/HHRA calculated ruling additional COCs? And if so, what were the results?
13. 1.2 Previous Investigation Results: You discuss concentrations of PCE and DCE....however, at what depth were they found? When you did the initial investigation, did you rule out the other daughter/degradation products of TCE? Why were these the only ones being investigated? This needs to be discussed in more detail.
14. Section 2.0 Site-Specific Sampling Methods and Results: You state that you have successfully defined the horizontal and vertical extent of the ground water plume with one exception. This is only true if screening against Class II. You make no mention of what standard you are comparing against; Class I vs Class II. If using Class I, then T0L01-GP08 (west), T0L01-GP07 (south) , and T0L01-GP02 (north) all exceed standards.
15. I assume that the IEPA reviewed and gave some form of approval for this work plan. With that stated, you mention that ‘several boring attempts were unsuccessful due to subsurface foundations....’ Did you consult Navy personnel or IEPA to inform of the problem and what you were proposing to do to rectify and where is this documented?
16. Section 2.2.1 Soil Analytical Results: There is no mention of what you are screening against. You state that concentrations were reported at depths from 8 ft to 12 ft. Were any other samples taken below 12 ft and were they non-detected? How many samples were taken per boring? What intervals were the samples taken?
17. Table 1: Results indicated ‘hits’ at 4-8 ft 8-12 ft. Were any samples taken below 12 ft and if so, what were the results? T0L01-GP04 has a value of 550,000 ug/kg....how do you know if you have the vertical delineation of contamination at this point?

18. Table 1: No screening values are indicated.
19. Figure 2-4: Can you overlay soil contamination with your proposed groundwater plume?
20. Figure 2.4: Can you overlay soil contamination with your proposed groundwater plume?
21. Figure 2-2: There is confusion between the text and this figure. Specifically, you mention GL95-105S-123 and GL95-105S-133 and neither of these are indicated on the figure. It looks like GL95-105S-121 and GL95-105S131 represent the former. Is this true?