



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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July 16, 2007

Engineering Field Activity, Midwest
Attn: Mr. Howard Hickey
Building 1A, Code 931
2703 Sheridan Road, Suite #120
Great Lakes, Illinois 60088-5600

Re: Proposed Plan for Site 22
Former Building 105 – Old Dry
Cleaning Facility, 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 submitted Proposed Plan for Site 22, Former Building 105 – Old Dry Cleaning Facility, Naval Station Great Lakes. It was drafted on behalf of the Naval Facilities Engineering Command (Navy). It was dated June 2007 and was received at the Agency on June 7, 2007. The Proposed Plan is being presented to satisfy the statutory and regulatory requirements for public participation under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and to seek public input on the proposed cleanup alternative. The Agency has reviewed the submittal and is providing the following comments.

- 1) **About This Document** – Obviously, the dates listed here and elsewhere in this document for accepting public comments will need to be updated.
- 2) **Facility Description** – The last sentence mentions the intent to close the hazardous waste storage area through the Resource Conservation and Recovery Act (RCRA) program. It does not discuss the intent to close the site out under CERCLA or how these two programs interrelate at this site. There should be a brief explanation of why the site was investigated, remediated, and closed under CERCLA, while also complying with the closure requirements under RCRA.
- 3) **Site Description** – As above, this section should explain why the closure of this site will be handled under both programs.

- 4) **Site Description** – The discussion in the second paragraph should explain that the hotspot near the southeastern corner of the building (grease trap) was related to the dry cleaner, rather than the RCRA storage facility.
- 5) **The Proposed Cleanup Plan** – It should also state here that a Land Use Control Implementation Plan (LUCIP) for this site will be appended to the Land Use Control Memorandum of Agreement (LUCMOA) between the Navy and Illinois EPA to ensure the restrictions will be applied and enforced until they are no longer required.
- 6) **Summary of Site Risks** – In the last paragraph, it is stated that the estimated cancer risk value for future occupational workers of 1.1×10^{-6} is less than the U.S. EPA's target risk range and the Illinois EPA's goal of 1×10^{-6} . This is inaccurate. A value of 1.1×10^{-6} is within the U.S. EPA's target risk range and slightly above Illinois EPA's goal of 1×10^{-6} .
- 7) **What's a Formal Comment** – This section needs to inform the public that they have the ability to request a 30-day extension to the public comment period. It should also tell them how to request such an extension.

Once these comments have been properly addressed and the document revised accordingly, Illinois EPA should be able to provide our concurrence with the proposed alternative, as listed in this Proposed Plan.

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

BAC:  H:\GLN\TC\Site 22related\Site22PPrvw

cc: Bob Davis, Tetra Tech NUS, Inc.
Owen Thompson, USEPA (SR-6J)