



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 Mary A. Gade, Director

217/524-3300

March 31, 1998

CERTIFIED MAIL  
P 344 343 887

Department of the Navy  
Southern Division  
Naval Facilities Engineering Command  
David Cabiness  
P.O. Box 190010  
North Charleston, SC 29419-9010

Re: 0971255004 -- Lake County  
U.S. Navy Great Lakes Naval Training Center  
IL7170024577  
Log No. C-689-M-5  
RCRA Closure

Dear Mr. Cabiness:

This letter is in response to a closure plan modification request entitled "RCRA Closure Soil & Groundwater Sampling Plan Addendum" (Addendum No. 3, September 1997) submitted by Charlie Zeal, P.E. of Rust Environment & Infrastructure, Inc. on your behalf. This submittal dealt with RCRA closure activities for three (3) hazardous waste container storage areas at the above referenced facility (referred to as Building 105, Building 415 and Building 912). A plan to close these units, and several other units at the facility was initially approved by Illinois EPA on April 21, 1993 (Log No. C-689) and was last modified on February 21, 1997 (Log No. C-689-M-4).

The subject submittal was reviewed as a request to modify the approved final RCRA closure plan for Great Lakes Naval Training and is hereby approved subject to the following conditions and modifications:

1. For Building 105, soil samples shall be collected within the shaded areas for the proposed boring locations as depicted in Figure 3-4, Building 105-S01 Area. These soil samples shall be continually sampled down to the water table. Soil samples sent to the laboratory should be analyzed for Volatile Organic Compounds using Test Method 8260b of SW-846. Additional soil sampling and analysis should be conducted as necessary to define the extent of contamination.
2. For Building 415, soil samples shall be collected within the shaded areas for the proposed boring locations as depicted in Figure 3-6, Building 415-S01 Area. These soil samples shall be continually sampled down to the water table. Soil samples sent to the laboratory should be analyzed for Volatile Organic Compounds using Test Method 8260b of SW-846.

Additional soil sampling and analysis should be conducted as necessary to define the extent of contamination.

3. For Building 912, soil samples shall be collected within the shaded areas for the proposed boring locations as depicted in Figure 3-6, Building 912-S01 Area. These soil samples shall be continually sampled down to the water table. Soil samples sent to the laboratory should be analyzed for Volatile Organic Compounds using Test Method 8260 of SW-846. Additional soil sampling and analysis should be conducted as necessary to define the extent of contamination.
4. A report documenting the results of the additional soil investigation efforts described above should be submitted to the Illinois EPA by July 1, 1998. This report should be developed in accordance with the attached document entitled "RCRA Soil and/or Groundwater Investigation Results Report." This date may be extended if a written demonstration is made to Illinois EPA that the facility is attempting to carry out the required activities in a timely manner, but needs additional time to complete them.
5. At the time of this letter, an inspection has yet to be performed for the two (2) hazardous waste container storage (S01) areas referred to as Buildings 145 and 520. Correspondence regarding closure of these two units will be sent at a later date.
6. The five hazardous waste container storage areas referred to as Buildings 105, 145, 415, 520 and 912 are the only RCRA units yet to be close at this facility.
7. Closure of the hazardous waste management units at this facility must meet the requirements of 35 Ill. Adm. Code 620, 35 Ill. Adm. Code 725, Subpart G and 35 Ill. Adm. Code 742.
8. The attached form entitled RCRA Interim Status Closure and Post-Closure Plans General Form (LPC-PA18) must be completed and accompany all information submitted to the Illinois EPA associated with the RCRA closure activities described in this letter. As noted on the form, two copies must accompany the original of all submittals, so that the information can be distributed to the appropriate Illinois EPA personnel, including regional offices.
9. The facility shall compare all groundwater analytical results to the 35 Ill. Adm. Code 620.420 (Class II) Groundwater Quality Standards. The facility shall determine the classification of groundwater in accordance with the attached procedures for the purpose of applying groundwater standards.
10. The data submitted indicates that the groundwater surrounding the three (3) container storage (S01) areas, a.k.a., Buildings 105, 415 and 912, has been impacted, as indicated by the sampling and analysis results previously submitted. As previously requested in

Condition 4 of the Illinois EPA's September 9, 1996 (Log #C-689-M-3) letter, the facility shall determine the vertical and horizontal extent of groundwater contamination. The installation and utilization of the proposed temporary well points is hereby approved, however, the Illinois EPA reserves the right to require additional permanent groundwater monitoring wells and additional sampling and investigative techniques, based upon the results obtained from the temporary points, if necessary.

11. The facility has proposed to use SW-846 Method 8240 to analyze the groundwater samples for the presence of volatile organic compounds. The Final (Promulgated) Update III to SW-846 has deleted this particular method and replaced the analysis with Method 8260b. SW-846 method 8260b shall be used to analyze the collected groundwater samples for volatile organic compounds at the facility.
12. Well completion reports, boring logs and copies of well abandonment forms for each of the temporary well points installed at the facility shall be submitted to the Illinois EPA by July 1, 1998. All necessary forms must be complete and accurate; all boring logs must be completed by a Licensed Professional Geologist (LPG).
13. The facility shall purge a minimum of three (3) wells volumes prior to sampling each temporary well points. The Illinois EPA notes that a maximum of five (5) well volumes will be removed from each well point. The facility should also rely on the stability of field parameters (e.g., pH, temperature, specific conductance) to determine when the monitor point has been sufficiently purged/evacuated.
14. The facility shall submit a scaled map(s) of each container storage area, depicting the actual locations of each of the temporary well points installed at the three (3) container storage areas (Building 105, 415 and 912) as part of the submittal required by Condition 12 above.
15. When closure of the remaining RCRA storage units at this facility is complete, certification of closure of these units must be submitted to Illinois EPA. This certification must be developed in accordance with 35 Ill. Adm. Code 725.215 and Condition 3 of Illinois EPA's March 29, 1994 letter (corrected June 6, 1994).
16. In a March 29, 1994 letter (corrected June 6, 1994), Illinois EPA accepted certification of closure of the following former RCRA storage units at the subject facility:
  - a. Building 38H Drug Screening Laboratory S01 Area
  - b. Building 81H Naval Hospital S01 Area
  - c. Building 104A Public Works Center S01 Area
  - d. Building 220 Navy Resale Activity S01 Area
  - e. Building 520 Service School Command S01 Area 2
  - f. Building 520 Service School Command S01 Area 3
  - g. Building 521 Service School Command Gun School S01 Area

- h. Building 1212 Loading Dock S01 Area
- i. Building 1517 Warehouse S01 Area
- j. Building 1712 Maintenance S01 Area
- k. Building 3212C S01 Area

It should be noted that during any future excavation and/or construction at Building 521, the site safety plan must address worker exposure to the remaining soil contamination at that unit.

Except as modified above, closure activities at the above referenced facility must be carried out in accordance with 35 Ill. Adm. Code 725, Subpart G and Illinois EPA's letters of February 21, 1997 (Log No. C-689-M-4), September 9, 1996 (Log No. C-689-M-3), September 28, 1995 (Log No. C-689-M-2), June 12, 1995 (Log No. C-689-M-1) and March 6, 1994, corrected June 6, 1994 (Log No. C-689).

Should you have any questions regarding groundwater issues, please contact Vickie Broomhead at 217/524-3285. Questions regarding any other aspect should be directed to William T. Sinnott, II at 217/524-3310.

Sincerely,



Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Bureau of Land

ECB:WTS\mls\97623.WPD

*SKA*  
Attachments: Class II Groundwater Demonstration Guidance Document  
LPC-PA18  
RCRA Soil and/or Groundwater Investigation Results Report

bcc: Bureau File  
Maywood Region  
Jim Moore  
Vickie Broomhead  
Bill Sinnott