



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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217/524-3300

September 3, 2003

CERTIFIED MAIL

7002 3150 0000 1219 8797

Mr. Mark Schultz
Department of the Navy
Navy Public Works Center
Building 1-A
2703 Sheridan Road, Suite 120
Great Lakes, Illinois 60088-5600

Re: 0971255004—Lake County
US Navy Great Lakes Naval Training Center
IL7170024577
Log No. C-689-M-9
Received: May 23, 2003
RCRA Closure

Dear Mr. Schultz:

This letter is in response to a May 19, 2003 submittal from Mr. Daniel M. Fleming, Department of the Navy regarding certain aspects of RCRA closure activities at the above-referenced facility. Mr. Fleming's submittal responded to the Illinois EPA letter of April 9, 2003 and presented appendices to the Land Use Control Memorandum of Agreement (LUCMOA) between the Illinois EPA, United States EPA and the United States Department of Navy to place restrictions on Buildings 145, 415, and 912 at this facility necessary to complete RCRA closure efforts of the former hazardous waste container storage areas in these buildings.

The facility is currently undergoing RCRA closure of four (4) hazardous waste container storage areas. These units are referred to as Building 105, 145, 415, and 912. A plan to close these units, as well as several units at this facility was initially approved by Illinois EPA on March 29, 1994 (Log No. C-689); this plan has been modified several times, the last being on April 9, 2003 (Log No. C-689-M-8). The Illinois EPA's April 9, 2003 letter required that the LUCMOA for the subject facility be modified to place certain restrictions on Buildings 145, 415 and 912 to complete RCRA closure of the former hazardous waste container storage areas in these buildings; this letter also approved certification of closure for a fifth former hazardous waste container storage area at Building 520.

Mr. Fleming's May 19, 2003 submittal was reviewed as a request to modify the approved RCRA closure plan for the four remaining former hazardous waste container storage areas at the above-

referenced facility. This closure plan modification request is hereby approved subject to the following conditions and modifications:

1. It appears as though the Great Lakes Naval Training Center has met the requirements of 35 Ill. Adm. Code 725 for Buildings 145, 415 and 912 and Illinois EPA hereby accepts the certification of closure of these units. As such, no further action is necessary for the aforementioned units at these buildings provided the requirements of this letter are met.
2. Certain restrictions must remain in place as part of the LUCMOA for this facility:
 - a. For Building 145, the LUCMOA: (1) restricts future groundwater usage at the facility; and (2) restricts future exposure to the soils remaining at this unit;
 - b. For Building 415, the LUCMOA: (1) requires future maintenance of the engineered barrier in place over the soil remaining at this unit; and (2) restricts future exposure to the soils remaining at this unit;
 - c. For Building 912, the LUCMOA: (1) requires future maintenance of the engineered barrier in place over the soils remaining at this unit; (2) restricts future exposure to the soils remaining at this unit and (3) restricts future groundwater usage at the facility.
3. Closure activities for the former hazardous waste container storage area at Building 105 may be coordinated with remedial activities being carried out at the rest of Building 105 under the DSMOA between the Department of the Navy and Illinois EPA for this facility. This is the only former hazardous waste container storage area yet to be closed at this facility.
4. A completed LPC PA-18 must accompany all submittals made to Illinois EPA regarding RCRA closure activities at this facility.
5. Closure efforts at this facility must meet the requirements of 35 Ill. Adm. Code 725, Subpart G. Any variation to the closure activities approved by this letter shall be the subject of a request to modify the approved closure plan which is submitted to the Illinois EPA for review and approval. Any such request must contain detailed information regarding the proposed modifications and the procedures which will be followed to complete closure of the unit(s). In addition, this request must contain information demonstrating that the proposed modifications meet the requirements of 35 Ill. Adm. Code 725, Subpart G.

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This letter shall constitute Illinois EPA's final decision on the subject submittal. Within 35 days after the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Work required by this letter, your submittals or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This letter does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Should you have questions regarding groundwater issues associated with this project, please contact Jeff Guy at 217/558-2710; any other questions associated with this project should be directed to William T. Sinnott, II at 217/524-3310.

Sincerely,



Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

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John IBM