



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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June 29, 2009

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

Re: Responses to Comments on the SAP for the  
Site Investigation Site 21 – Building 1517  
Landfill, 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 Agency comments regarding the Sampling and Analysis Plan for the Site Investigation Site 21 – Building 1517 Landfill, Naval Station Great Lakes, Great Lakes, Illinois (attached). They were dated June 2009 and were received via electronic mail on June 11, 2009.

The Agency has conducted a review of the Navy's responses and verified the changes were made appropriately in the accompanying pdf file of the UFP-SAP in track-change mode. The Agency has nothing further to add at this time. Please provide at least 2 weeks notice before commencement of Site Investigation field activities at Site 21.

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](mailto: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 21\Site21SISAPRtCrww

cc: **Biff Cummings, Tetra Tech NUS, Inc.**

Owen Thompson, USEPA (SR-6J)

**RESPONSE TO COMMENTS  
ILLINOIS EPA REVIEW  
June, 2009  
SITE 21 UFP-SAP  
NAVAL STATION GREAT LAKES**

The following provides response to comments made by Mr. Brian Conrath in a May 28, 2009 letter to Mr. Howard Hickey regard the Draft Sampling and Analysis Plan for the Site Investigation to be performed at Site 21 – Building 1517 located at Naval Station Great Lakes.

- 1) **Worksheet #11, 13** – Another input that should be listed in Section 11.2 is the UST Site 5 closure soil sampling data. Some of those sample locations were actually within the bounds of Site 21 and the results will have an impact on the Site 21 data.  
***Response: References to the monitoring reports obtained for the biosparge remediation system at Building 1600A (UST Site 5) have been added to Worksheets #11 and 13.***
- 2) **Worksheet #11** – On page 25, and elsewhere, another source for the Project Action Limits for groundwater should be the regulations found at 35 Illinois Administrative Code (IAC) 620. These are State of Illinois regulations for groundwater quality and are considered to be Applicable or Relevant and Appropriate Regulations (ARAR).  
***Response: Added Reference to Worksheet #11, 15, and in References Section.***
- 3) **Worksheet #11** – In the last sentence of Section 11.3, the field work is said to be scheduled for spring 2009. This will need to be updated as appropriate.  
***Response: Updated to from spring 2009 to fall 2009.***
- 4) **Worksheet #11, 14, 17, 18** – The shallow subsurface sampling interval should be 0-6 inches rather than the 0-2 feet listed here, provided there is enough material to collect all of the required samples. If there is insufficient volume, the Agency can agree to the interval being increased to 0-12 inches.  
***Response: The shallow subsurface sampling interval was changed to 0 – 6 inches starting below pavement/gravel. And the second subsurface sampling interval was changed to 6 inches below pavement/gravel to the water table.***
- 5) **Worksheet #11** – Under Step 2 of Section 11.4, suggest rewording the end of the last sentence to ... and no COPCs are selected, determine that No Further Action is warranted.  
***Response: Reworded Decision Statement and Decision Rules to “the project team will determine that NFA is appropriate for Site 5.***
- 6) **Worksheet #14** – On page 31 under DPT Boring, it appears that the deeper subsurface soil samples are to be collected only if there are elevated readings on the PID or the XRF. The Agency disagrees with this strategy. A subsurface sample should be collected in every case, with the elevated readings, as well as other inputs, merely determining from what depth below ground surface those samples are collected. One of the listed reasons for investigating this site was the possibility of landfilling operations

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having been conducted there. Without pushing through to the water table and collecting additional samples at-depth, it will be impossible to confirm or refute that possibility. This comment will apply elsewhere in the document as well. (Worksheet 17)

***Response: Changed sampling strategy to collecting a soil sample from each interval at each DPT Boring location (a total of 44 samples). PID/XRF, along with visual observations, will be used to help determine the location of the subsurface soil sample within each interval. The following sentences are included in the discussion on DPT Borings in Worksheet #14:***

***“Subsurface soil will be collected from two intervals (0 to 6 inches below pavement/gravel and 6 inches below pavement/gravel to water table) in 22 locations using DPT. Therefore, a total of 44 subsurface soil samples will be collected. Each subsurface soil interval will be screened with the PID and XRF, and any signs of potential contamination (such as odor or staining) will be noted. This data, along with visual observations, will be used to select the soil sample to be tested. For each interval, a sample will be collected from the area where the elevated reading and/or odor or staining was located.”***

- 7) **Worksheet #16** – The Project Schedule\Timeline listed here will need to be updated.  
***Response: Updated UFP-SAP completion dates.***
- 8) **Figure 17-1** – The Agency was unable to locate soil sample 21SB06 on the figure. Suggest locating it due south of 21SB07, at the edge of the parking area.  
***Response: Inserted soil sample as suggested.***
- 9) **Figure 17-1** – Suggest rearranging the monitoring well locations slightly. Suggest moving monitoring well 21MW02 to the east approximately half the distance to the eastern site border and moving monitoring well 21MW03 to the south to just north of the edge of the paved parking area, as shown on this figure.  
***Response: Rearranged monitoring wells as suggested.***
- 10) **Appendix E** – On the title page, the word safety has been misspelled.  
***Response: This correction has been made.***

***Note – other minor changes were made to the document based on comments from the Navy Government Chemist. All changes have been highlighted or tracked in ‘track change’ mode to assist with the review process.***