



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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May 28, 2009

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

Re: Sampling and Analysis Plan 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 Sampling and Analysis Plan for the Site Investigation Site 21 – Building 1517 Landfill, Naval Station Great Lakes, Great Lakes, Illinois. It was dated April 2009 and was received on April 29, 2009. The SAP constitutes the Navy's planning document, addressing specific protocols for sample collection, sampling handling and storage, chain-of-custody, laboratory and field analysis, data validation, and data reporting. The SAP was generated for and complies with applicable U.S. Navy, Illinois EPA, and United States EPA Region 5 requirements, regulations, guidance, and technical standards. The Agency has conducted a review of the Draft SAP and is herein providing comments generated during that review.

- 1) **SAP Worksheets #11 and 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.
- 2) **SAP 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).
- 3) **SAP 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.
- 4) **SAP Worksheets #11, 13, 17, and 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.

- 5) **SAP 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*.
- 6) **SAP 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 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)
- 7) **SAP Worksbeet #16** – The Project Schedule\Timeline listed here will need to be updated.
- 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.
- 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.
- 10) **Appendix E** – On the title page, the word safety has been misspelled.

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
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

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cc: Biff Cummings, Tetra Tech NUS, Inc.

Owen Thompson, USEPA (SR-6J)