N00210.AR.000416
NSTC GREAT LAKES
5090.3a

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

(217) 557-8155
(FAX) 782-3258

September 24, 2009

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

Re: Navy Responses to Comments on the Sampling and Analysis Plan for the RI/RA Site 9 – Camp Moffett Disposal Area 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 on the Sampling and Analysis Plan for the Remedial Investigation/Risk Assessment Site 9 – Camp Moffett Disposal Area, Naval Station Great Lakes, Great Lakes, Illinois. They were dated July 24, 2009 and were received via electronic mail on July 26, 2009. The Agency has conducted a review of the Navy's responses and has generated a few follow-on comments, which are provided below. Navy responses not discussed below are considered to be acceptable.

1) **Response to Comment #2** - The original comment was concerned with the absence of surface soil samples and a subsequent risk evaluation of the surficial soil level. As stated, a decision was made to exclude surface soil from the investigation, which has since been revised to be a Site Inspection rather than a Remedial Investigation. This decision should be presented and discussed in the Sampling and Analysis Plan. Without such discussion and proper justification, the absence of a surface soil assessment appears to be a major oversight.

2) **Response to Comment #11** – The State understands the Navy's hesitancy to revise the Worksheet #15 "action limits" to conform to the proposed TACO objectives. We concur with the added footnote explaining that revised values will be used upon finalization of the TACO proposal. However, an explanation is needed for the solitary Worksheet #15 revision; the soil action limit for mercury was changed from 0.1 mg/kg to 3.1 mg/kg. The lowest current TACO value for mercury (the Construction Worker inhalation objective) is 0.1 mg/kg. If it can be demonstrated that there is no **elemental** mercury contamination (see

742.Appendix B Table B, footnote "s"), the inhalation pathway can be excluded and the mercury screening level could then be increased to 23 mg/kg, the current residential ingestion value. Please revise accordingly.

3) **Response to Comment #12** – The response states the worksheet was corrected based on the revised screening values. However, the footnote at the bottom of the worksheet noting the applicable screening values should include the specified ARAR even if none of the values listed there have been used.

4) **Response to Comment #22** – The original comment asked that the distinction between the Worksheet #15 "action limits" and Appendix B Section 1.2.1 "screening criteria" be explained. The response provides that explanation. However, we cannot find the explanation within the revised document.

5) **Response to Comment #33** – The original comment requested details regarding the "Occupational Worker" exposure input parameters presented in Appendix B, Tables 3 and 4. Appendix B, Section 2.1.3, Bullet #2, indicates that the occupational worker is included in the risk assessment to account for possible future commercial/industrial land use. In answer to an earlier comment (Agency Comment #28), it appears this receptor now encompasses future and current workers. The Tables 3 and 4 exposure parameters are inconsistent with these receptors. Additionally, the Construction Worker PEF was recalculated per Agency Comment #34 and should be included in the subject tables. Tables 3 and 4 should be revised and provided to the Agency for review.

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:[illegible]\GLNTC\Site 9\Site9RISAPR\Crvw

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