



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND
MIDWEST
201 DECATUR AVENUE, BUILDING 1-A
GREAT LAKES, ILLINOIS 60088-2801

5090
Ser EV 1574
12 Dec 2005

Mr. Brian A. Conrath
Illinois Environmental Protection Agency
Bureau of Land, Federal Facilities Unit
Federal Site Remediation Section
1021 North Grand Avenue East
P. O. Box 19276
Springfield, Illinois 62794-9276

SUBJECT: RESPONSE TO ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
LETTERS DATED JULY 20, 2004 AND MAY 12, 2005 AND
REQUEST FOR NO FURTHER REMEDIATION LETTER FOR
BUILDINGS 324 & 106

Dear Mr. Conrath,

The Navy requests a No Further Remediation Letter for Buildings 324 and 106. Enclosed please find two (2) copies of amended November 2005 Corrective Action Completion Reports (CACRS) for the former leaking underground storage tanks at Buildings 324 and 106. The amended November 2005 CACRS address Illinois Environmental Protection Agency's (IEPA) comments in letters dated July 20, 2004 and May 12, 2005 for Buildings 324 and 106 respectively.

For Building 324, the original Navy CACR submission is dated May 2004 and was received by the IEPA on June 9, 2004.

Similarly, the original Navy CACR submission for Building 106 is dated February 2005 and was sent to IEPA on March 21, 2005.

If you have any questions, please feel free to contact me at (847) 688-5999, ext 154.

Sincerely

A handwritten signature in black ink, appearing to read "William Busco".

WILLIAM BUSCO
Environmental Engineer

Enclosures: Bldg 324 CACR (2)
Bldg 106 CACR (2)



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

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

2005 MAY 20 PM 12:25

May 12, 2005

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Department of the Navy
EFA Midwest
c/o Bill Busko
Environmental Department
201 Decatur Avenue
Great Lakes, Illinois 60088-5600

Re: LPC # 0971255004 -- Lake County
Naval Station Great Lakes -- Building 106
Naval Station Great Lakes -- Naval Station Great Lakes Fire Department - Building 106
LUST Incident No. 933116
LUST Technical File and Superfund Technical File

Dear Mr. Busko:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's Amended Corrective Action Completion Report, Closure of Former Leaking Underground Storage Tank Building 106, Naval Station Great Lakes, Great Lakes, Illinois requesting closure at Building 106. It was generated by Toltest, Inc. and was dated February 2005 and received on March 25, 2005. In the submittal the Navy provides responses to Illinois EPA's comment letter dated September 24, 2004 and requests an NFR determination be made based on the proposed institutional controls, land use restrictions (Industrial/Commercial current and future land use), base-wide groundwater use restriction, and the existence of an engineered barrier. The Agency has reviewed this submittal and provides the following additional comments:

- 1) **Response to Comment Number Two** -- The response states that Section F has been revised to include the GPS coordinates. Section F does not appear to have been revised, as there are no GPS coordinates provided there. Please revise as necessary.
- 2) **Response to Comment Number Three** -- The response states that the 45-Day Report apparently had some errors and that the excavation dimensions were really 20 feet by 9

feet by 6 feet, rather than the reported 36' x 16'. It also states that the liner was either not installed or was removed at a later time. It then suggests the PNA contamination could be attributed to the area being covered with asphalt and that PNAs are ubiquitous throughout the area. Finally, it states that large chunks of concrete fill would account for auger refusal at both borings within the former excavation. First, please document in the report how and from where the new dimensions for the excavation were derived and whether the liner existed or not. Second, the Agency will agree that some trace level PNA contamination might be attributed to the asphalt, but not a level high enough to more than double the Tier I Industrial / Commercial Ingestion pathway soil remediation objective of 0.8 mg/kg. Levels this high are also not ubiquitous. Last, if the excavation cavity had been backfilled with gravel which included large chunks of concrete, then auger refusal would have occurred prior to reaching the lower limit of the previous excavation. If the previous excavation went to a depth of 6 feet, the underground storage tank invert would have been located roughly at approximately that depth. It would be unlikely that the tank would have been installed directly on top of chunks of concrete. Since soil boring NTC-106-SB2 was located directly above the west end of the former tank location and only met refusal at 6 feet below ground surface, it must then follow that refusal was met below the previous excavation in what should have been native soil. The Navy's explanation may have merit, but at this point it appears to be merely a convenient theory.

- 3) **Response to Comment Number Six** – It is agreed that the groundwater has not been adequately characterized at Building 106. According to 35 IAC 742.300(b), “No exposure route may be excluded from consideration until characterization of the extent and concentrations of contaminants of concern at a site has been performed.” Therefore, the groundwater at this site must be adequately characterized before an exposure pathway can be excluded or any final determination made.
- 4) **Response to Comment Number Seven** – The response states that the mistake noted in this comment has been corrected. It has not. It still references two samples with elevated analytes as being between 7 to 10 feet below ground surface, when in the previous paragraph, the depth range listed for benzo(a)pyrene contamination is from 4-6 feet, due to auger refusal at 6 feet. Therefore, the actual depth of that borehole is 6 feet and the identified contamination must be 4-6 feet, rather than 7-10 feet. This discrepancy still requires correction.
- 5) **Response to Comment Number Eight** – The comment listed here does not match the comment made in the Agency's September 24, 2004 letter. The comment repeated and responded to here was a comment made in regards to another LUST site at Naval Station, Great Lakes in a different letter. It has been noted that the comment referred to a statement that has now been removed from the CACR. However, the information now presented in Section 2.2 still requires revision. See comment number 3 above.

- 6) **Executive Summary** – The last sentence of the second paragraph states that all results were below the SRO for TACO Tier I Residential Pathway. That is not the case. Those results may have been below the Tier I Residential Ingestion and Inhalation specific exposure route screening values, but as stated in the previous two sentences, there were exceedances of the soil component of the groundwater ingestion exposure route screening values. The soil remediation objective is always the most conservative (lowest) of all the applicable exposure route screening values, of which the soil component of the groundwater ingestion exposure route is one. Please clarify the intent of this statement. This clarification will need to be made throughout the report as well.
- 7) **Executive Summary** – Several times in the third paragraph and throughout the report, there is reference to the Tier I Residential and Commercial Soil Remediation Objectives (SROs). Please clarify what is meant. Does this refer to the Industrial-Commercial SROs, the Residential SROs, or both the Residential and the Industrial-Commercial SROs?
- 8) **Section 1.5, Pathway Exclusion** – The first bulleted item states the requirements of Sections 742.300 and 742.305 have been met and then provides the justification. As noted in comment number 3 above, the requirements under 35 IAC 742.300(b) have not been met.
- 9) **Section 3.0, Recommendations** – The justification for NFR status provided in this section is compelling and addresses the majority of the Agency's concerns. However, the groundwater has not been adequately characterized. The Agency, therefore, does not concur with the Navy's recommendation.

Illinois EPA suggests the Navy make the necessary corrections to the report, as noted in the above comments, and properly characterize the groundwater in the vicinity of the site. Once that has been accomplished, provided there are no additional exceedances of any groundwater screening values, the Agency should then be able to concur with the Navy's request for NFR status, incorporating the proposed institutional controls, land use restrictions (Industrial/Commercial current and future land use), base-wide groundwater use restriction, and the existence of an engineered barrier.

This letter does not complete the statutory and regulatory requirements pursuant to Section 57 of the Act (415 ILCS 5/57) for this LUST Incident. The outstanding LUST Program requirements must be addressed prior to the Illinois EPA issuing any No Further Remediation letter for this LUST Incident.

If you have any questions regarding this correspondence, you may contact me at (217) 557-8155

Building 106 Amended CACR Review
Naval Station, Great Lakes
May 12, 2005
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or via electronic mail at Brian.Conrath@epa.state.il.us.

Sincerely,

Brian A. Conrath

Brian A. Conrath
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

BAC
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cc: Tom Henninger, LUST