



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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June 2, 2008

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

Re: Draft Year 1 Long-Term Groundwater
Monitoring Report (April 2008)
Naval Station, Great Lakes
Great Lakes, Illinois

0971255048 – Lake County
Naval Station, Great Lakes
Superfund/Technical Reports

Dear Mr. Busko:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the *Draft Year 1 Long-Term Groundwater Monitoring Report April 2008) for Site 2 -Forrestal and Site 3 - Supplyside Landfill*, Naval Station Great Lakes, Great Lakes, Illinois. It was dated April 2008 and was received at the Agency on May 27, 2008. This report summarizes the results of the first year of quarterly groundwater monitoring for those two landfills which occurred between August 2006 and August 2007. This document was submitted to the Agency for review and comment.

Illinois EPA has reviewed the report and has generated the following comments.

- 1) **Section 1.2** – The first sentence at the top of page 1-2 states to meet the objective of the groundwater monitoring, eight quarterly rounds of groundwater monitoring are to be conducted over a two year period. The Agency has never agreed that the groundwater monitoring would only last for two years. Please see previous comments on the Sampling and Analysis Plan and subsequent documents for these landfills for the specifics to which the Agency did agree.
- 2) **Section 3.1** – The title of this section is misspelled.

- 3) **Section 3.3** – Following the last bullet on page 3-3, the report recommends deletion of VOCs, pesticides, PCBs, and herbicides from the analytical suite as early as the end of year 2. The Navy is free to submit a request for such a reduction at that time. However, it should be noted that the fact that those constituents have not exceeded their respective criteria does not necessarily justify their deletion from the analysis suite. The Agency has agreed in the past to removing constituents that have not been detected during recent or historical groundwater monitoring, but if those constituents are or have been detected in the groundwater, they would be required to remain on the list. The Navy, at the conclusion of the first two years of monitoring, may request to reduce the frequency of said monitoring though.
- 4) **Section 4.3** – See previous comment regarding deletion of constituents from the analytical suite.
- 5) **General Comment** – There is no discussion provided in this report regarding a determination for which, if any, of the monitoring wells would be considered either upgradient or unimpacted by the landfills. This should be part of the report, even if there is no definitive answer either way.

If you have any questions regarding this correspondence, you may contact me at (217) 557-8155 or via 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: Bob Davis, Tetra Tech NUS, Inc.