



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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July 2, 2009

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

Re: LPC # 0971255048 -- Lake County
Great Lakes Naval Station
Superfund Technical File

Dear Mr. Busko:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's Remedial Action Completion Report for Site 3 – Supply Side Landfill, Naval Station Great Lakes, Great Lakes, Illinois. It was dated April 2009 and was received at the Agency on June 9, 2009. This Remedial Action Completion Report (RACR) documents the implementation of the Supply Side Landfill Cap Work Plan, which occurred in 2004 and 2005, and was submitted to the Agency for review and comment. The Agency has conducted a review of the submittal and has generated the following comments:

- 1) **Section 2.0** – Following the fourth bullet, the sentence ends with the word “land.” That word should be deleted.
- 2) **Section 2.0** – The ARARs section should include IAC Title 35, Part 807.305(c) Final Cover, IAC Title 35, Part 807.502(a) and (b) Closure Performance Standard, and IAC Title 35, Part 811.322, Final Slope and Stabilization, Sections (a) through (c) also.
- 3) **Section 3.1** – The first sentence discusses the removal and replacement of waste from the “Panhandle Area.” The Agency recollects that this never took place. In Appendix E, the Daily Project Diary Report number 1 appears to bear this out. Please confirm whether the Panhandle Area was removed and re-deposited or not and revise the RACR accordingly.

- 4) **Section 4.1** – Midway through the first paragraph it mentions that “there are a few areas where the thickness is less than 2 feet”, which was the required minimum thickness for the cap. However, there is no discussion of what will be done to correct this situation. Please confirm that those areas have been or will, in a timely manner, be identified and the cap height increased to the minimum 2 foot thickness.
- 5) **Section 4.1** – The third paragraph begins by talking about the southern portion of the landfill and then switches to the northern half. Please determine which end of the landfill is the focus of this paragraph and revise accordingly.
- 6) **Section 4.2** – The second sentence ends with “in accordance with the land.” This does not make sense. Please review and revise as necessary.
- 7) **Appendix C** – Suggest adding the following items to the numbered Certification Checklist on the Compliance Certificate: Landfill properly vegetated, Presence of invasive, deep-rooted plant species, Gas vent rotary ventilator in working order and spinning freely.
- 8) **Appendix F** – Under number 4 on the Land Use Control Implementation Plan, suggest rewording the last line as follows: ...serves as a barrier against direct exposure to landfill waste and reduces the infiltration of storm water within the landfill boundary.
- 9) **Appendix F** – Under number 4a on the Land Use Control Implementation Plan, suggest rewording the second sentence as follows: A landfill cap/barrier exists at Site 3...”
- 10) **Appendix F** – Under number 4c on the Land Use Control Implementation Plan, suggest adding the words “disturbance or” between uncontrolled and removal in the first line. Additionally, suggest finishing the last line with the words “and maintain the final remedy/landfill cap.”
- 11) **Appendix F** – Under number 4d on the Land Use Control Implementation Plan, suggest inputting the word “reduces” between the words “and” and “infiltration” in the first line.

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July 2, 2009
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If you have any questions regarding anything in this correspondence or would like to discuss these comments, you may contact me at (217) 557-8155 or via 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

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