



Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-5953

March 1, 1996

Tony Andrews  
EFA Midwest  
Building 1A  
Great Lakes, IL 60088

Re: Fire Fighting Training Area (FFTU) Site Visit, after action report  
0971255048 -- Lake County  
Great Lakes Naval Training Center  
Superfund/Technical

Dear Mr. Andrews:

After reviewing the relevant and applicable regulations; 35 IAC Part 732, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the previously submitted investigative reports, and the information submitted during the site visit conducted by this Agency on February 23, 1996, a conference was held with Agency manager to determine the appropriateness of conducting your proposed remediation under those regulations. Specifically, if it is possible with the existing conditions to remove the underground storage tanks (USTs) and associated pipeline and pumps under UST rules rather than as a CERCLA action.

It is the opinion of myself and management that, if the following conditions are met, this type of action is warranted and appropriate. These conditions and caveats must be met both prior to and during all work at this site.

- It is required that Great Lakes Naval Training Center (GLNTC) submit acceptable documentation to substantiate its claim that no other substance than petroleum fuels, i.e., gasoline and diesel oil, were used during fire fighting training exercises at this site. If such documentation is unavailable this Agency will require a round of TAL/TCL and TCLP for Lead confirmatory sampling to confirm the absence of non-petroleum contamination. Specifically such sampling must include the sludge present in each UST.
- This Agency will require shallow subsurface sampling of the soils to substantiate GLNTC's contention that training exercises were conducted exclusively within the containment structures at this site; specifically the 3304A through D buildings, the torch stacks, and fire

fighting rings.

- Discussions should be held between this Agency, the project manager assigned by Region V, USEPA, and representatives of GLNTC to determine the appropriate course of action necessary to address the problem of invalidated sample analysis present in the Remedial Investigation Work for Site 4 produced by Halliburton NUS dated January 1993. Of particular interest will be confirmation of those samples previously reported as non-detect or below detection limits.
- The serviceability of the monitoring wells located adjacent to this site must be determined prior to the commencement of any work. If such examination of these wells indicates that they are in serviceable condition the Agency will require a preliminary round of sample to assess this sites potential impact of the groundwater resources present.
- It is requested that GLNTC provide answers to the following questions generated by a review of the Remedial Investigation Work Plan.

(1). What is the composition of "Solvent 144" referenced in section 2.1.4.1 (12) on page 2-7?

(2). What is the present condition of the pad mounted transformers and what plans for removal or protection of these areas does GLNTC have? This question is submitted due to the proximity of these structures to the two (2) 5,000 gallon USTs located in the east-central portion of the site. Excavation of these USTs could disturb soil that may be contaminated with Polychlorinated Biphenyls (PCBs) from leaks in the transformers. It is necessary to resolve this issue prior to beginning work on these USTs.

(3). What is the chemical composition, including breakdown products, of the substance commonly known as 'CS Gas' and any other gas compound used at building 3305 for the purposes of gas mask training? This question is posed for the same reasons as (2) above.

The work to be conducted at this site under Part 732 is to include only the Existing USTs and the associated underground pumps and pipelines. Also included in this discussion, at the present time, are those structures known as 'torch stack', 'fire fighting rings', and 'christmas trees'.

Specifically exempted from this discussion are the drain lines which lead from any of the aforementioned structures to the existing oil-water separator or to the decant ponds. Areas where fuel pipelines and drains intersect are also exempted from Part 732 and remain an open subject of discussion under CERCLA authority.

It is necessary for the final determination of Cleanup Objectives (CUOs) for the contaminants found at this site that a determination of the long term use to which this property will be put be made by GLNTC and submitted to this Agency. Without such a statement of post-remediation land use it is this Agency's policy to enforce the strictest standard available and set CUOs for residential use.

In the interim it is necessary that GLNTC maintain those physical barriers presently in place to restrict access to this site. It is requested that hazard notices be posted in addition to making any warranted repairs.

This correspondence is forwarded to aid in the definition of existing discussions between this Agency and GLNTEC and should not be considered as authority to proceed.

Please contact me at 217/524-5953 if you have any question or need any assistance.

Sincerely,



Donald W. Harrison  
Remedial Project Manager  
Federal Facilities Unit  
Remedial Project Management Section  
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Bureau of Land

DWH: ~~CLB~~:dwh:960301-1

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