MEMORANDUM

To: JP Messier, Environmental Engineer
From: Robert R. Beckwith, TolTest Project Manager
Date: February 21, 2000
Re: Delivery Order Completion Report
Remedial Investigation of Soil at Former FFTU Sludge Pit
Naval Training Center, Great Lakes, Illinois

This memo addresses your comments dated December 1999 concerning the Draft DOCR as referenced above.

Comments:

1. *Page 2, Section 2.0 - In the numbered bullets: move the ",and" to the end of bullet 2 and delete bullet 4*
Response: Done

2. *Page 4, section 4.2 - In the discussion of the material found in the sludge pit, there is no discussion of the moistness of the material or whether ground water was encountered. This should be briefly discussed since the boring logs in every case indicate that this material was dark colored and "wet".*
Response: Statement added: "The former sludge pit was found to be filled with medium-to-coarse grained sand, which was wet from perched water, and gray in color."

3. *Page 5, Section 4.3 - Paragraph 1, 3rd sentence change "were" to "was" in "A stainless steel, 2-inch diameter, split barrel sampler was used for sample collection."*
Response: Done

4. *Page 7, Section 5.1 - Reference is made in this section and in other subsequent sections to a Test Report which is attached. Which appendix is this document in? None of the appended documents are identified at the "Test Report".*
Response: Appendix C and Table of Contents changed to read "Test Report".

5. *Page 7, Section 5.2 - I don't understand the Antimony discussion. If 0.006 mg/L is the Tier 1 migration to groundwater standard then say so. The text implies in the first sentence that there are hits that are significantly below the detection limit signify but later in the paragraph I see detected concentrations of 0.224 mg/L. The impact of having a detection limit that is significantly higher than the remediation objectives should be discussed.*
Response: Discussions added for Tier 1, Tier 2, and Tier 3, and Class I groundwater and Class II groundwater objectives for inorganic compounds.

6. *Page 10, Section 6.0 - The recommendations here are for closure of the site however in the inorganics discussion, there are four metals that were detected at concentrations above the remediation objectives. In the discussion of the analytical*

results additional research is recommended to evaluate the impact of the results for antimony, iron, lead, and manganese. This section recommends a request for closure be prepared. These recommendations seem inconsistent. If further evaluation is required, a specific recommendation should be made either for modeling, more sampling, or a risk assessment. If no further investigation is recommended then a definite recommendation that the site can be closed should be made.

There is a reference made here to the possibility that new guidance will be issued by USEPA on risk assessments for golf courses. In the absence of this guidance or a definite date for it to be issued, existing levels in TACO or the Region 9 PRGs should be used for evaluation. Since submittals on this project are being made to IEPA, TACO should be used for evaluation of the analytical results. If the submittals were to go to EPA then a full risk assessment or screening against PRGs would be required. Fort Sheridan is a former Army base not Naval.
Response: Section 6.0 has been re-written.

7. Figure 2 - The units used in these summaries should be the same as the unit designations used in the text (mg/L vs ppm)
Response: Figure 2 was redone to show concentrations in mg/L.