

8/12/02

Response to Comments (cont.)
Illinois Environmental Protection Agency Comments on the
Draft Site 7 RI/RA Report
at NTC Great Lakes

- 1) Executive Summary – It is stated here and in other places (Sections 7.3.2, 7.4, 8.0 etc...) that, in regards to the groundwater, “Considerable dilution of chemical concentrations in the groundwater at Site 7 is expected to occur before discharge to the nearby ditch or Pettibone Creek.” Has any modeling or calculation been completed to determine this would be the case or is this just an assumption? If modeling was performed, that data should be included in this report. If this is an assumption, these statements should be removed or additional text added to clarify their derivation.
These statements will be revised based on the information provided in the attached memorandum on modeling of metals transport in groundwater. Some of the specifics of this modeling will be added to the text of the report and as a table, no appendix will be provided.
- 2) Executive Summary – It is stated here and in other sections that the Site 7 area is 100% paved. Illinois EPA believed the soil borings and monitoring wells installed furthest east (MW/SB05, MW/SB06, MW/SB07) were located in the ditch across the road (Ohio Street), which is not paved. Therefore, these statements should be corrected.
These three soil borings/monitoring wells were moved into the street and out of the grassy area (not a ditch) due to underground and overhead utilities. Therefore, all of the samples were within the paved area of Site 7.
- 3) Executive Summary - Illinois EPA suggests rewording the last two sentences as follows:
Based on the results of this RI/RA, no further investigation or remedial action is warranted at this site. The Record of Decision for this site will state that No Further Action is necessary, provided a Land Use Control (LUC) is applied to insure the site remains Industrial/Commercial in use.
The document will be changed based on the results of the hot spot removal and confirmatory sampling. When the hot spot removal is completed, a No Further Action will be applied. No LUCs will be required.
- 4) Section 2.1.2 – In the second line on page 2-2, the units following the number 20 are missing. Please insert.
The document will be changed to include the units, feet.
- 5) Section 2.1.2 – In the third line on page 2-2, RCC should be RTC.
The document will be changed in accordance with the comment.
- 6) Section 2.1.2 – In the sixth line on page 2-2, the word are should be area.
The document will be changed in accordance with the comment.
- 7) Section 2.3.2 - It is stated that the sample location is shown on Figure 2-2. However, the sample location is not identified on that figure. Please correct.
The reference to the figure will be removed.

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- 8) Section 3.2.2 – The sixth line should have the word “human” added prior to the word “health.”
The document will be changed in accordance with the comment.
- 9) Section 3.2.8 – The third sentence in the second paragraph does not make sense. Please re-write this sentence.
The sentence will be re-written to say “The solid slug was then removed and the rate of rise in the water level back to equilibrium (rising-head test) was measured.
- 10) Section 3.2.9.4 – The acronym FOL should be defined the first time it is used. Please correct.
The document will be changed in accordance with the comment.
- 11) Figure 3-3 – For the cross-section, it should go from A to A’. The apostrophe is missing from the second A.
The figure will be changed in accordance with the comment.
- 12) Section 4.0 – In the third paragraph, the definition of TACO should be Tiered Approach to Corrective Action *Objectives*.
The document will be changed in accordance with the comment.
- 13) Section 4.3.1 – In the last paragraph, it states that SW-846 method 6010B can produce false positive results for thallium and other metals because of interferences. What is the reference for this statement? Please clarify.
The paragraph will be revised to say “However, the Site 7 groundwater samples were analyzed for metals on the Trace version of the ICP using SW 846 6010B. This method can produce false positive results for thallium (and other metals such as arsenic and lead). These analytes may require a more sensitive method (ICP-MS) to prevent uncertain quantitation below the optimum range of the instrument (EPA, 2001).”
- 14) Section 4.3.3, SVOCs – The last sentence in this section applies to most of the subsurface samples, but does not apply to the sample from soil boring NTC07SB12. This should be clarified. Additionally, the more likely source for the contamination found in this boring, NTC07SB12, is a release from the aboveground storage tanks (ASTs) previously stored in that area.
The text will be clarified in accordance with the comment.
- 15) Section 6.5.1.1, Existing Databases – The data were collected as part of a CERCLA Remedial Investigation (RI) rather than a RCRA Facility Investigation were they not? Please correct.
You are correct, this is a CERCLA RI and will be changed to indicate so.
- 16) Section 6.6 – The ILCR risk values in the last few paragraphs of this section are stated to be in the USEPA risk management range of 1×10^{-6} to 1×10^{-4} . Please state the calculated

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ILCR value here followed by the USEPA risk management range. This presents a better picture of where the calculated value fits into the risk range, near the upper or lower end of the range.

The calculated ILCRs that are in the text and tables of Section 6 will be included in Section 6.6 as follows: (calculated total ILCR (adult + child) for the military resident is 1.6×10^{-5}) – this is a typical example.

- 17) Table 6-18 – The word “reasonable” is misspelled in the title.
The document will be changed in accordance with the text.
- 18) Section 8.0, Sixth Bullet – See comment number 14 above.
The text will be clarified in accordance with the comment.
- 19) Section 8.0 – See comment number 3 above.
The document will be changed in accordance with the response to comment 3 above and the results of the hot spot removal.
- 20) Appendix A-10 – The Chain of Custody Forms have not been received by signatures. Were they not signed as having been received? Please submit the fully signed versions of these forms in the final version of this document.
The document will be changed to include the signed COCs.
- 21) General – Given that the risk driver responsible for the majority of the risk involved with this site is Benzo(a)Pyrene and several other polynuclear aromatic hydrocarbons (PAHs) in the immediate vicinity of the former ASTs, has any thought been given to performing a limited removal in that specific area? This would remove most of the higher-level residues of those PAHs and thereby possibly reduce the cancer risk to below the unrestricted use level (1×10^{-6}). (That calculation has not been performed, but it is assumed that would be the case.) This would allow the state to concur with a No Further Action Decision with no LUCs or restrictions whatsoever.
A limited removal action will be conducted and text will be added to reflect this. This will delay finaling the Site 7RI/RA so that text can be added after the removal occurs. Risks from soil will be reevaluated assuming that samples with the higher concentrations will be removed. The risks were lower but were still greater than $1E-6$. This is mainly due to the toxicity value (CSF) for benzo(a)pyrene. It should be noted that even exposure to 1/2 the analytical detection limit (165 mg/kg) for benzo(a)pyrene results in residential ILCRs greater than $1E-6$. Therefore, the calculated risks would probably always be within the risk management range.
- 22) General – The document has a significant amount of typographical errors in the text. Please conduct a more thorough proof/review prior to submittal.
The document will be proof read prior to final submittal.