

09.01.07.006



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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February 7, 2003

Commander, Southern Division  
Naval Facilities Engineering Command  
Attn: Mr. Anthony Robinson  
2155 Eagle Drive  
North Charleston, South Carolina 29406

Re: Navy Responses to Illinois EPA Comments,  
Draft Final Remedial Investigation and Risk  
Assessment Report, Site 7 – RTC, Silk Screen  
Shop, Naval Training Center Great Lakes

0971255048 – Lake  
Great Lakes Naval Station  
Superfund/Technical

Dear Mr. Robinson:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's responses to Illinois EPA's comments on the Draft Final Remedial Investigation and Risk Assessment Report, Site 7 – RTC Silk Screen from Tetra Tech NUS, Inc. The responses were sent via electronic mail on January 28, 2003. The Agency has reviewed the Navy's responses and a few responses elicited additional comments, which follow. However, all responses were judged acceptable. Once the changes delineated in the Navy's responses have been made, the document is ready to be finalized. Illinois EPA cannot grant its concurrence on the Final Remedial Investigation and Risk Assessment Report until the promised changes have been verified. Upon verification of these items, the Agency will draft a final concurrence letter.

Our specific additional comments follow:

**Response #1:** This response pertained to the State's comment regarding the need to use the lowest TACO objective from all receptors and all pertinent routes of exposure when performing an initial screen for chemicals of potential concern. The response observes that the manganese construction worker inhalation objective is lower than the residential inhalation value. It fails to note that the naphthalene construction worker inhalation objective (effective February 5, 2002) is substantially lower than the residential counterpart. However, the site concentration for naphthalene is below the lower construction worker objective and no revision of the report is required.

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Great Lakes Naval Training Center  
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**Response #14:** This response is in reply to the State's comment regarding the unjustified construction worker exposure frequency of 150 days. For the construction worker, the Agency targets activities that are soil intensive, such as excavating building foundations and form building, utility installation, and pre-construction and final landscape contouring. Given the size of Site 7, it is unlikely that any of these soil intensive activities would continue, for any given individual, for 30 weeks. However, the State will accept the exposure frequency of 150 days as a protective assumption.

If you have any questions regarding this letter, please contact me at (217) 557-8155 or via electronic mail at [brian.conrath@epa.state.il.us](mailto:brian.conrath@epa.state.il.us).

Sincerely,

*Brian A. Conrath*

Brian A. Conrath  
Remedial Project Manager  
Federal Facilities Unit  
Federal Site Remediation Section  
Bureau of Land

*BAC*  
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cc: Owen Thompson, USEPA (HSRL-5J)  
Bob Davis, Tetra Tech NUS, Inc.  
Mark Shultz, US Navy - EFA Midwest