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## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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April 9, 2003

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

Re: Responses to Comments on the Draft Remedial  
Investigation and Risk Assessment Report  
Site 17 - Pettibone Creek and Boat Basin

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 Responses to Illinois EPA's Comments on the Draft Remedial Investigation and Risk Assessment Report, Site 17 - Pettibone Creek and Boat Basin from Tetra Tech NUS, Inc. It was received at Illinois EPA via electronic mail on March 28, 2003. The Agency has reviewed the Navy's responses and has the following comments:

- 1) **Comment numbers 3, 19, 20, 21, 28, 33, 36, 57, 64, and 67** - These comments all relate to the VOC sample collection and analysis methodology. The Agency is in agreement that the QAPP was incorrect in its description of the procedures for collecting and analyzing sediment samples for VOCs and that the document reviewers overlooked the mistake. Therefore, with the knowledge gained from previously held discussions and the explanation included in this Response to Comments, Illinois EPA concurs that the procedures used to collect and analyze the sediment samples for VOCs were acceptable.
- 2) **Comment numbers 6, 7, 8, 10, 15, 22, 23, 25, 26, 27, 31, 35, 66, 68, and 69** - These comments all relate to the issue of upstream, off-site sources for the contaminants found at Site 17. The provided example verbiage is a distinct improvement over the version in the Draft RI. The revised explanation is more accurate as to the possible sources. However, the added text still does not discuss the possible contribution to the PAH and

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arsenic levels by the historical coal-fired plants used for heating and other industrial-type activities that were on base or the storage areas where the coal would have been kept prior to its use. This will need to be discussed also. The revision also states that there is no data to indicate the transformer storage locations are a source of contaminants to Pettibone Creek. As is stated in the response, the clean-up documentation for those locations is not available. Therefore, there is no data to indicate that the PCB-contaminated soil, that has been documented, has been removed or has not migrated to the creek. Given the lack of analytical data, the assumption that those locations are not sources to Pettibone Creek are just that, assumptions, and should not be stated in this document without some justification of that fact.

- 3) **Comment number 29** – Please add the clarification to the referenced paragraph.
- 4) **Comment numbers 30, 34, and 65** – The comment is understood. However, it should then also be stated that while the reported concentrations are within the anthropogenic background range for soils, Illinois EPA currently does not recognize those values as background concentrations in Illinois.

Illinois EPA cannot grant its concurrence on the Final Remedial Investigation and Risk Assessment Report until these additional comments have been addressed and the proposed changes have been verified. Upon reaching agreement on the above comments and verification that the proposed changes have been made to the final document, the Agency will draft a final concurrence letter.

If you have any questions or require additional information, please contact me at (217) 557-8155 or by electronic mail at [brian.conrath@epa.state.il.us](mailto:brian.conrath@epa.state.il.us).

Sincerely,

*Brian A. Conrath*

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Remedial Project Manager  
Federal Facilities Unit  
Federal Site Remediation Section  
Bureau of Land

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