



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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February 27, 2007

Engineering Field Activity, Midwest
Attn: Mr. Howard Hickey
Building 1A, Code 931
2703 Sheridan Road, Suite #120
Great Lakes, Illinois 60088-5600

Re: Proposed Plan for Site 17
Pettibone Creek and Boat Basin
Naval Station, Great Lakes
Great Lakes, Illinois

0971255048 – Lake
Great Lakes Naval Station
Superfund/Technical

Dear Mr. Hickey:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the submitted Proposed Plan for Site 17, Pettibone Creek and Boat Basin, Naval Station Great Lakes. It was drafted on behalf of the Naval Facilities Engineering Command (Navy). It was dated February 2007 and was received at the Agency on February 7, 2007. The Proposed Plan is being presented to satisfy the statutory and regulatory requirements for public participation under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and to seek public input on the proposed cleanup alternatives. The Agency has reviewed the submittal and is providing the following comments.

- 1) **About This Document Section** – The public comment period date range will need to be revised based upon when the plan is actually made available. This revision will need to occur throughout the document.
- 2) **About This Document Section** – Suggest adding the word “final” in the last sentence of the first paragraph just prior to the word “remedy.”
- 3) **Page 3, 2nd Paragraph** – The first sentence does not appear to be complete. As written, it does not make sense. Please revise as necessary.
- 4) **Summary of Site Risks Section** – The estimated cancer and non-cancer risks associated with the exposure pathways should be provided along with the chemicals of concern.

- 5) **Why is Cleanup Needed? Section** – Suggest rewording the last sentence to read as follows: It is the judgment of the Navy and Illinois EPA that the preferred alternative identified in this Proposed Plan, or one of the other active measures considered in the Proposed Plan, is necessary to protect the public health and welfare and the environment from actual or potential releases of hazardous substances into the environment.
- 6) **A Closer Look at the Proposed Cleanup Plan Section** – There should be a concluding summary statement at the end of this section similar to:

“Based on the information currently available, the Navy believes the Preferred Alternative meets the threshold criteria and provides the best balance of tradeoffs among the other alternatives with respect to the balancing and modifying criteria. The Navy expects the Preferred Alternative to satisfy the following statutory requirements of CERCLA §121(b): 1) be protective of human health and the environment; 2) comply with ARARs; 3) be cost-effective; 4) utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable; and 5) satisfy the preference for treatment as a principal element.”
- 7) **Table 1** – Under Alternative 4, the timeframe to attain the RAOs is listed as “within 5 years.” A more specific evaluation should be presented. An estimated amount of time to conduct the removals, dewater the sediments, and dispose of the contaminated sediment should be provided. It is understood that this is merely an estimate and may vary a great deal based upon funding, but within 5 years is too vague for a Proposed Plan. The feasibility study stated that the RAOs would be achieved almost immediately and the PRGs would be attained within 1 year.
- 8) **Page 7** – The second section should be titled “Why Does the Navy Recommend this Proposed *Alternative*?”
- 9) **Page 8** – The second sentence in the last paragraph on the page should read, “You can use the form below to send written comments or to request a formal public meeting be held.”
- 10) **General Comment** – Although it is implied, there should be a clear statement provided that the preferred alternative can change in response to public comments or based upon receipt of new information.

Once these comments have been properly addressed and the document revised accordingly, Illinois EPA should be able to provide our concurrence with the proposed alternative, as listed in this Proposed Plan.

Site 17 Proposed Plan Review Letter
Naval Station Great Lakes
February 27, 2007
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If you have any questions regarding anything in this letter or require any additional information, please contact me at (217) 557-8155 or by electronic mail at brian.conrath@illinois.gov.

Sincerely,

Brian A. Conrath

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

BAC: *ROC* \\frac:H\GLNTC\Site 17related\Site17PPrvw

cc: Bob Davis, Tetra Tech NUS, Inc.
Owen Thompson, USEPA (SR-6J)