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State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

April 21, 1993

U.S. Navy Great Lakes Naval Training Center
Attn: Mr. P.J. Mosites
Building 1
Great Lakes, Illinois 60088-5000

Re: 0971255004 -- Lake County
U.S. Navy Great Lakes Naval Training Center
IL7170024577
Log No. C-689
Received: January 21, 1993
RCRA - Closure

Dear Mr. Mosites:

The closure plan submitted by the Department of the Navy (hereafter "GLNTC") and prepared by SEC Donahue Environment and Infrastructure, dated July 1992, has been reviewed by this Agency. As part of this review, a Part A modification request dated August 14, 1992 and received by FAX on April 5, 1993 was also reviewed. This Part A modification request is addressed in Condition 1 below.

Your final closure plan to close the sixteen (16) hazardous waste container storage units at the above referenced facility as identified as "Hazardous Waste S01 Areas" in Table 2-1 of the subject submittal is hereby approved subject to the following conditions and modifications:

1. The Part A modification request, submitted as a Partial Facility Part A Withdrawal Request Form, dated August 14, 1992 and received by FAX on April 5, 1993, is hereby approved. Building 68H, Building 210B, and Building 3217 are hereby removed from the Part A application dated November 4, 1980, and signed by Mr. J.W. Tombarge, CAPT CEC USN, Commanding Officer, PWC.

2. Closure activities must be completed by November 1, 1993. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within sixty (60) days after closure, or by January 1, 1994. These dates may be revised if GLNTC finds that additional time is required to complete all required closure activities and GLNTC demonstrates to the Agency that it is carrying out the activities described in the approved closure plan in a timely manner.

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for the closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

As part of the closure certification, to document the closure activities at your facility, please submit a Closure Documentation Report which includes:

a. The volume of waste, waste residue, and contaminated soil (if any) removed. The term waste includes wastes resulting from decontamination activities.

b. Scaled drawings showing the horizontal and vertical boundaries from which contaminated soil was removed.

c. A description of the method of waste handling and transport.

d. The waste manifest numbers.

e. Copies of the waste manifests.

f. A description of the sampling and analytical methods used including sample preservation methods and chain-of-custody information.

g. A chronological summary of closure activities and the cost involved.

h. Color photo-documentation of closure [illegible] conditions before, during, and after closure.

i. Tests performed, methods and results.

j. Information documenting the results of all required soil sampling/analysis efforts. The goal of this presentation should be to present, in a logical manner, the activities and results associated with the sampling/analysis effort. At a minimum, such a presentation should contain:

1. Identification of the reason for the sampling/analysis effort and the goals of the effort.

2. A summary of the analytical data, including tables and all QA/QC data associated with the sampling/analysis effort.

3. A scaled drawing showing the horizontal and vertical location where all soil samples were collected.

4. A description of the soil sampling procedures, sample preservation procedures and chain of custody procedures.

5. Identification of the test methods used and detection limits achieved, including identification of any sample preparation techniques utilized, dilutions made and interferences encountered during the analysis.

6. Copies of the laboratory report sheets, including results of the analysis conducted on QA/QC samples.

7. A discussion of all QA/QC procedures implemented during to soil sampling efforts.

8. Visual classification of each soil sample in accordance with ASTM D-2488.

9. A discussion of the data, as it relates to the overall goal of the sampling/analysis effort.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control -- #33
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

3. Along with your certification of closure, please submit a letter requesting withdrawal of your facility's Part A application.

4. The soil cleanup objectives listed below must be met at those hazardous waste management units where soil sampling/analysis is required. Achievement of these objectives is necessary to ensure that the closure performance standards of 35 IAC 725.211 and 725.214 are met.

Soil Cleanup Objectives

Parameter	CUO (mg/kg)	ADL (mg/kg)
arsenic (TCLP)	0.05 mg/l	
barium (TCLP)	2.0 mg/l	
cadmium (TCLP)	0.005 mg/l	
chromium (TCLP)	0.1 mg/l	
cyanide (TCLP, pH=7)	0.2 mg/l	
lead (TCLP)	0.0075 mg/l	
mercury (TCLP)	0.002 mg/l	
selenium (TCLP)	0.05 mg/l	
silver (TCLP)	0.05 mg/l	
acetone	0.7	
benzene	0.005	
carbon tetrachloride	0.005	
dimethylaminoazobenzene	ND	
ethylbenzene	0.7	
methanol	3.5	
methylene chloride	0.005	
mineral spirits	50.0	
tetrachloroethylene	0.005	
trichloroethylene	0.005	
toluene	1.0	
1,1,1-trichloroethane	0.2	
1,1,2-trichloroethane	0.005	
1,1,2-trichloro-1,2,2-trifluoroethane	4200.	
trichlorofluoromethane	2.1	
xylenes	10.0	
acenaphthene	8.4	
anthracene	42.0	
fluoranthene	5.6	
fluorene	5.6	
naphthalene	0.025	
pyrene	4.2	
benzo(a)anthracene	0.0026	0.0087
benzo(a)pyrene	0.0046	0.015
benzo(b)fluoranthene	0.0036	0.012
benzo(k)fluoranthene	0.0034	0.011
chrysene	0.03	0.1
dibenzo(a,h)anthracene	0.006	0.02
indeno(1,2,3-cd)pyrene	0.0086	0.029
Other Non-Carcinogenic PNAs (total)	4.2	
acenaphthylene		0.66
benzo(g,h,i)perylene		0.051
phenanthrene		0.66

Soil Cleanup Objectives (continued)

Parameter	CUO (mg/kg)	ADL (mg/kg)
1,1-dichloroethane	0.7	
1,2-dichloroethane	0.005	
1,1-dichloroethylene	0.007	
cis-1,2-dichloroethylene	0.07	
trans-1,2-dichloroethylene	0.1	
vinyl chloride	0.02	

ADL: Acceptable Detection Limits have been set by the Agency to aid in the evaluation of residual soil contamination for those substances where health or environmentally based cleanup objectives are below commonly attainable detection limits. The stated cleanup objectives remain the goal; however the Agency will accept analyses as proof of acceptable cleanup if these analyses (1) do not detect the parameter of concern, (2) have a detection limit which is at or below the ADL for that parameter, and (3) were conducted in accordance with the quality assurance criteria set forth in SW-846.

ND: Not Determined; insufficient data available upon which to base a cleanup objective. If this chemical is detected after all other objectives have been met, additional efforts will be made by the Agency to establish soil cleanup objectives.

TCLP: Toxicity Characteristic Leaching Procedure (Method 1311 of SW-846, Third Edition)

5. The proposal contained in the second paragraph of Section 6.0, "Secondary Containment and Paved Surface Decontamination Requirements", to not steam clean and triple rinse the paved surfaces of hazardous waste container storage located outside a building that have cracks, gaps, or other voids that necessitate soil sampling on the condition that these soil sample analytical results indicate contaminant levels below IEPA established cleanup objectives is disapproved. Any paved surface, whether inside a building or outside a building, that was a part of a hazardous waste container storage unit shall be decontaminated utilizing the procedures presented in Condition 7 below.

6. The following comments pertain to Section 7.0, "S01 Area Descriptions and Specific Sampling, Analytical, and Decontamination Requirements":

   a. All references to "Section 6.0" refers to Section 6.0, "Secondary Containment and Paved Surface Decontamination Requirements" of the above referenced document.

   b. All soil samples shall be analyzed for the parameters listed in Table 5-2, "Sampling and Analysis Summary",

for the parameters listed in association with the soil sample's respective units.

c. All soil samples shall be collected in accordance with Section 5.0, "Sampling and Analytical Requirements", of the above subject submittal. Specifically, all soil samples to be collected beneath concrete shall be collected in the 0"-6" interval beneath the concrete/native soil interface or the backfill/native soil interface if backfill is present. All soil samples to be collected beneath bituminous paving (asphalt) shall be collected from the 6"-12" interval beneath the asphalt or backfill and the native soil interface. All soil samples to be collected from a location where there is not any paving or where the paving is grossly deteriorated shall be collected from the 6"-12" interval.

d. Except as modified in 6.e thru 6.t below, all soil sampling locations shall be as shown in Figure 7-3 thru Figure 7-16 of the subject submittal.

e. Regarding Building 38H, the proposed decontamination for this unit as described in Section 6.0 is hereby approved. In addition, the proposal to not collect soil samples at this unit is also approved.

f. Regarding Building 81H, the proposed decontamination for this unit as described in Section 6.0 is hereby approved. In addition, the proposal to not collect soil samples at this unit is also approved.

g. Regarding Building 104A, the proposed decontamination for this unit as described in Section 6.0 is hereby approved. The proposal to not collect soil samples at this unit is approved subject to the inspection detailed in Condition 7 below. If, based upon the inspection described in Condition 7 below, it is evident that soil samples will be necessary, then these soil samples shall be analyzed for RCRA Metals, VOCs, and SVOCs utilizing the test methods presented in Table 5-1, "Media-Specific SW-846 Analytical Methods", in the above-referenced document.

h. Regarding Building 105, the proposed decontamination for this unit as described in Section 6.0 is hereby approved. In addition, the two proposed soil samples are also approved, subject to Conditions 6.b, 6.c, and 6.d above. However, one additional soil sample shall be collected within one foot of the drain located approximately 15.8' west and 14' south of the northeast corner of Building 105. This additional soil sample shall be collected and analyzed utilizing the same procedures as the other three soil samples for this unit.

i. Regarding Building 145, the proposed decontamination for this unit as described in Section 6.0 is hereby approved. In addition, the proposed location for the three soil samples is also approved.

j. Regarding Building 220, the proposed decontamination for this unit as described in Section 6.0 is hereby approved. The proposed location for the two soil samples is also approved. However, the area between Building 220 and the gravel parking lot (i.e. the driveway) shall be inspected in accordance with Condition 7 below. If, based upon the inspection described in Condition 8 below, it is evident that soil samples will be necessary, then these soil samples shall be analyzed for VOCs utilizing the test method presented in Table 5-1, "Media-Specific SW-846 Analytical Methods", in the above-referenced document.

k. Regarding Building 415, the proposed decontamination for this unit as described in Section 6.0 is hereby approved. The two proposed sampling locations are also approved. The proposal to not decontaminate the concrete floor underneath the walk-in cooler is approved with the understanding that if the analysis of the washwater or rinsewater collected while steam cleaning/triple rinsing the rest of the hazardous waste container storage unit detects the presence of any hazardous constituents then the concrete floor underneath the walk-in cooler must be decontaminated as described in Section 6.0.

l. Regarding Building 520 - Area 1, the proposed decontamination for this unit as described in Section 6.0 is hereby approved subject to Condition 5 above. The proposed locations of the three soil sampling locations is also approved.

m. Regarding Building 520 - Area 2, the proposed decontamination for this unit as described in Section 6.0 is hereby approved. The proposal to collect no soil samples is also approved, subject to an inspection in accordance with Condition 8 below. If, based upon the inspection described in Condition 8 below, it is evident that soil samples will be necessary, then these soil samples shall be analyzed for RCRA Metals, VOCs, and SVOCs utilizing the test methods presented in Table 5-1, "Media-Specific SW-846 Analytical Methods", in the above-referenced document.

n. Regarding Building 520 - Area 3, the proposed decontamination for this unit as described in Section 6.0 is hereby approved. The proposal to collect no soil samples is also approved, subject to an inspection in accordance with Condition 8 below. If, based upon the inspection described in Condition 8

below, it is evident that soil samples will be necessary, then these soil samples shall be analyzed for RCRA Metals, VOCs, and SVOCs utilizing the test methods presented in Table 5-1, "Media-Specific SW-846 Analytical Methods", in the above-referenced document.

o. Regarding Building 521, the proposed decontamination for this unit as described in Section 6.0 is hereby approved. The proposal to collect no soil samples is also approved, subject to an inspection in accordance with Condition 8 below. If, based upon the inspection described in Condition 8 below, it is evident that soil samples will be necessary, then these soil samples shall be analyzed for ignitability, RCRA Metals, VOCs, and SVOCs utilizing the test methods presented in Table 5-1, "Media-Specific SW-846 Analytical Methods", in the above-referenced document.

p. Regarding Building 912, the proposed decontamination for this unit as described in Section 6.0 is hereby approved. The seven proposed soil samples are also approved, however one additional soil sample shall be located approximately 8 ft. west of proposed soil sampling location 912-SO-06 inside of the bermed area on the western wall and located over the crack identified in Figure 7-12 of the subject submittal. This additional soil sample shall be collected and analyzed utilizing the same procedures as the other seven soil samples for this unit. The four soil samples to be collected outside, 912-SO-01 through 912-SO-04, must be collected in native soil. The soil sampling locations may be adjusted if it is determined that the soil at any of the four proposed locations is native soil.

q. Regarding Building 1212, the proposed decontamination for this unit as described in Section 6.0 is hereby approved. The proposal to not collect any soil samples is also approved.

r. Regarding Building 1517, the proposed decontamination for this unit as described in Section 6.0 is approved, although only the southern half of the storage unit, as identified in Figure 7-14 as an area 31.6' X 15.0', needs to be decontaminated. Additionally, proposed soil sampling location 1517-SO-01 need not be collected. Proposed soil sampling locations 1517-SO-02 and 1517-SO-03 are approved, subject to Conditions 6.b, 6.c, and 6.d above. The Agencys decision to not require the decontamination or sampling of the northern half of the hazardous waste container storage area is due to a telephone conversation between Mr. Mark Schu[illegible] of GLNTC and the Agency during which it was indicated that the northern half of the storage unit has never been used

for the storage, treatment, or disposal of hazardous wastes.

s. Regarding Building 1712, the proposed decontamination for this unit as described in Section 6.0 is hereby approved, subject to Condition 5 above. The five proposed soil samples are also approved, subject to Conditions 6.b, 6.c, and 6.d above. However, one additional soil sample shall be collected on the west side of the pad near where the crack shown in Figure 7-15 of the subject submittal intersects the western edge of the storage unit (approximately due west of proposed soil sampling location 1712-SO-01 as shown in Figure 7-15 of the subject submittal).

t. Regarding Building 3212C, the proposed decontamination for this unit as described in Section 6.0 is hereby approved. The three proposed soil sampling locations are also approved.

7. The concrete/asphalt surfaces of each container storage area with such a base shall be visually inspected, photographed, and any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete/asphalt surfaces must be steam cleaned and triple rinsed. All wash and rinse water shall be collected.

8. After cleaning the concrete/asphalt surfaces at each applicable storage area, an independent registered professional engineer shall inspect the integrity of the concrete/asphalt surfaces. These surfaces shall be inspected for cracks which penetrate through the concrete. In addition, all construction joints must be inspected to ensure that they are watertight. This inspection must be carried out in accordance with standards and recommendations of professional/technical entities such as the American Concrete Institute, the Portland Cement Association, the American Society for Testing and Materials, the American Society of Civil Engineers, etc. which relate to the ability of concrete/asphalt structures to contain liquids. The results of this inspection shall be (1) submitted in the form of a report, (2) included in the closure documentation report required by Condition 1 above, and (3) certified in accordance with 35 Ill. Adm. Code 702.126 by the engineer. The reports must include (1) the results of the inspection, (2) scaled drawings showing the location of all cracks and construction joints observed during the investigation, (3) conclusions reached regarding any cracks or construction joints observed in the areas of concern, (4) justification for the conclusions reached (e.g., information must be provided which indicates that any construction joints in the areas of concern are indeed watertight) and (5) photographs to support the conclusions reached.

If joints, cracks, or other defects are found in the concrete/asphalt during the inspection required in the above paragraph which would potentially allow hazardous waste or hazardous constituents to migrate through them, then soil samples must be collected from beneath the concrete/asphalt to determine if hazardous waste or hazardous constituents have been released to the underlying soil. This sampling/analysis effort shall be carried out in accordance to the below listed procedures:

a. Samples must be collected from at least one location along each joint or crack that provides a potential for hazardous waste or hazardous constituents to migrate to underlying soil. If the crack/joint is more than 15' long, then samples must be collected from along the crack/joint at 15' intervals. Such locations shall be biased to stained areas or low-lying areas where spills would tend to accumulate.

b. The procedures used to collect and analyze all samples shall be carried out in accordance with the procedures approved by this letter.

c. Samples shall be collected from the 0"-6" interval or the 6"-12" interval if VOCs are of concern below the subgrade/natural soil interface.

9. The following procedures must be utilized in the collection of all required soil samples:

a. The procedures used to collect the soil samples must be sufficient so that all soil encountered is classified in accordance with ASTM Method D-2488.

b. If a drill rig or a similar piece of equipment is necessary to collect the required soil samples, then:

1. The procedures specified in ASTM Method D-1586 (Split Spoon Sampling) or D-1587 (Shelby Tube Sampling) must be used in collecting the samples;

2. Soil samples must be collected continuously at several locations to provide information regarding the shallow geology of the area where the investigation is being conducted;

3. Soil samples not collected explicitly for VOC analysis should be field-screened for the presence of VOCs;

4. All soil samples which will be analyzed for volatile organic compounds must be collected in accordance with Attachment 7 of the Agency's RCRA closure plan instructions; and

5. All other soil samples must be collected in accordance with the procedures set forth in SW-846.

6. When visually discolored or contaminated material exists within an area to be sampled, horizontal placement of sampling locations shall be adjusted to include such visually discolored and/or contaminated areas. Sample size per interval shall be minimized to prevent dilution of any contamination.

10. Quality assurance/quality control procedures which meet the requirements of SW-846 must be implemented during all required sampling/analysis efforts. Except as modified in this letter, sample collection, handling, preservation, preparation, and analysis must be carried out in accordance with the procedures set forth in SW-846

11. If soil is present in the vicinity of the subject container storage areas which contains contaminants above the soil cleanup objectives set forth in Condition 3 above, then a sufficient number of additional soil samples should be collected and analyzed to clearly determine the horizontal and vertical limits of the soil which exceeds the established cleanup objectives in and around the hazardous waste container storage units undergoing closure. The procedures used to collect and analyze these samples must be in accordance with those approved by this letter. The procedures used for determining the horizontal and vertical locations from which these samples must be collected shall be in accordance with Sections 13.a and 13.b of the Agency's RCRA closure plan instructions. However, no random sampling shall be used to make this determination.

    a. Samples need only be analyzed for those constituents which exceed the cleanup objectives in the vicinity of the additional sample locations.

    b. Where the cleanup objectives in Condition 5 exceeds the ADL, then the required detection limit must meet the ADL for that compound.

12. The Agency must be notified in writing if, at any time, it is found that soil contamination above the established cleanup objectives extends to near the water table. This notification must be made within 15 days after such a discovery is made. A plan to investigate for potential groundwater contamination must be submitted to the Agency for review and approval within 60 days after the initial written notification is submitted to the Agency.

13. Contaminated soil may be excavated and disposed off-site at any time during closure. The goal of any such effort should be to remove all soil which exceeds the established cleanup objectives.

14. If GLNTC determines that soil excavation and off-site disposal is not the preferred remedial action for this closure, then the Agency must be notified in writing when such a determination is made. At that time, the Agency will provide GLNTC with additional guidance regarding the information which must be submitted to the Agency for review and approval relative to the alternative remedial action which the facility would like to implement.

15. To avoid creating another regulated storage unit during closure, it is recommended that you obtain any necessary permits for waste disposal prior to initiating excavation activities. If it is necessary to store excavated hazardous waste on-site prior to off-site disposal, do so only in containers or tanks for less than ninety (90) days. Do not create regulated waste pile units by storing the excavated hazardous waste in piles. The ninety (90) day accumulation time exemption (35 IAC 722. 134) only applies to containers and tanks.

16. All contaminated soil which is excavated for off-site disposal must be managed as hazardous waste in accordance with 35 IAC 722, 723, 728, and 809, as well as applicable federal regulations.

17. If removal and off-site disposal is the chosen remedial action for the soil contamination encountered at the subject container storage area, then soil samples must be collected for analysis from the bottom and sidewalls of the final excavation from which contaminated soil was removed. This sampling analysis effort is necessary to demonstrate that the remaining soil meets the established cleanup objectives.

    a. A grid system as set forth in Section 13.b of the Agency's closure plan instructions must be established over the excavation.

    b. Samples must be collected from the floor of the excavation at each grid intersection, including intersections along the perimeter of the excavation.

    c. Samples must be collected 6"-12" below the ground surface at each grid intersection around the excavation perimeter. Samples must also be collected at the midpoint of the excavation wall at each grid intersection along the excavation perimeter.

    d. Collection/analysis of all required samples must be in accordance with the procedures approved in this letter.

    e. Soil samples which must be analyzed for volatile organic compounds (VOCs) shall be collected using Attachment 7 of the Agency's RCRA closure pla instructions. In addition, such sample must be collected 6"-12" beneath the floor/sidewalls of the

excavation to minimize the possibility of volatilization of the contaminants prior to the collection of the samples.

f. No random sampling shall be conducted to verify that the cleanup objectives have been met.

18. If removal and off-site disposal is the chosen remedial action for the soil contamination encountered at the subject container storage area, then additional soil must be removed, as necessary, until it can be demonstrated that the remaining soil in and around the area of concern meets the established cleanup objectives. Additional samples must be collected and analyzed in accordance with Condition 11 above from areas where additional soil has been removed.

19. If it is determined that paved surfaces must be removed to remediate any contaminated soil lying below it, then the top of the paved surface utilized to store hazardous waste shall be cleaned in accordance with Condition 7 above. The bottom of the paved surface shall then be scraped and/or brushed to remove all materials adhering to it. Once the top and bottom of the paved surface has been cleaned in accordance with these procedures, the pad may be disposed of as construction debris. All activities must be carried out by personnel who are properly trained and who have the proper personal protective equipment.

20. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

21. All references to the "Agency's RCRA closure plan instructions" refers to the document entitled Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities, December 11, 1990. A copy of this document is enclosed.

22. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 IAC 725.211, the Agency reserves the right to amend the closure plan. Revisions of closure plans are subject to

the appeal provisions of Section 40 of the Illinois Environmental Protection Act.

23. All samples shall be analyzed individually (i.e., no compositing). Sampling and analytical procedures shall be conducted in accordance with the Third Edition of SW-846 and Attachment 7 to this Agency's closure plan instruction package. When an SW-846 (Third Edition) analytical method is specified, all the chemicals listed in the Quantitation Limits Table for that method shall be reported unless specifically exempted in writing by the Agency. When visually discolored or contaminated material exists within an area to be sampled, horizontal placement of sampling locations shall be adjusted to include such visually discolored and/or contaminated areas. Sample size per interval shall be minimized to prevent dilution of any contamination. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed. To demonstrate that a parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the Third Edition of SW-846 (Third Edition) Volume 1A, pages TWO-29 and TWO-30, Table 2-15. If possible, your sampling program should be extensive enough to determine the lateral and vertical extent of contamination to the detection limit (PQLs) referenced above.

24. If clean closure cannot be achieved pursuant to 35 IAC Part 725 then a modified closure plan and a post-closure plan prepared pursuant to 35 IAC Part 725 must be submitted to the Agency for review and approval within 60 days of such a determination.

25. Please be advised that the requirements of the Responsible Property Transfer Act (Public Act 85-1228) may apply to your facility due to the management of RCRA hazardous waste. In addition, please be advised that if you store or treat on-site generated hazardous waste in containers or tanks pursuant to 35 IAC 72.134, those units are subject to the closure requirements identified in 35 IAC 722.134(a)(1).

26. All hazardous wastes that result from this project are subject to annual reporting as required in 35 IAC 722.141 and shall be reported to the Agency by March 1 of the following year for wastes treated and left on-site or shipped off-site for storage, treatment, and/or disposal during any calendar year. Additional information and appropriate report forms may be obtained from the Agency by contacting:

    Facility Reporting Unit
    Bureau of Land
    Illinois Environmental Protection Agency
    2200 Churchill Road
    P.O. Box 19276
    Springfield, Illinois 62794-9276

Should you have any questions regarding this matter, please contact Michael A. Heaton at 217/524-3312.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:mah

Attachments: I. Closure Certification Statement
II. Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities (December 11, 1990)

cc: USEPA Region V -- George Hamper
Charles A. Zeal, P.E. -- RUST Environment and Infrastructure
Cindy Burns - SOUTHNAVFACENGCOM