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State of Illinois

## ENVIRONMENTAL PROTECTION AGENCY

09.01.22 0002

Mary A. Gade, Director  
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

June 6, 1994

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

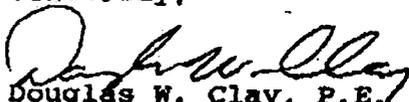
Re: 0971255004 -- Lake County  
Great Lakes Naval Training Center  
(Naval Public Works Center)  
IL7170024577  
RCRA - Closure

Dear Mr. Mosites:

Enclosed please find a corrected copy of this Agency's March 29, 1994 closure plan approval letter. Please note that the only changes occur in Conditions 4.b and 4.d. The last sentence in both of these Conditions now states "Confirmatory soil samples should be analyzed for PNAs utilizing Method 8310 of SW-846."

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

Sincerely,

  
Douglas W. Clay, P.E.  
Hazardous Waste Branch Manager  
Permit Section, Bureau of Land

DWC:mah

Enclosure: Corrected Copy

cc: Charles A. Zeal, P.E. -- RUS  
Harold McGill -- Department of the



State of Illinois  
**ENVIRONMENTAL PROTECTION AGENCY**

Mary A. Gade, Director  
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

March 29, 1994  
(Corrected June 6, 1994)

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

Re: 0971255004 -- Lake County  
Great Lakes Naval Training Center  
(Navy Public Works Center)  
IL7170024577  
Log No. C-689  
Date Received: January 12, 1994  
RCRA - Closure

Dear Mr. Mosites:

This letter is in response to your document entitled "Partial Closure Certification and Sampling/Inspection Report - RCRA Hazardous Waste Container Storage Areas Closure", dated December, 1993 and received by the Agency on January 12, 1994. This document addressed the RCRA closure of sixteen RCRA hazardous waste container storage areas at the above referenced facility and contained closure certification for 12 units and a portion of a thirteenth unit. The subject submittal was handled as a closure plan modification request. Your final closure plan for sixteen hazardous waste container storage areas at the above-referenced facility is hereby approved subject to the following conditions and modifications:

1. This condition is in response to the partial certification of closure submitted by the Department of the Navy / Southern Division for twelve hazardous waste container storage areas (S01) at Great Lakes Naval Training Center ("GLNTC"). This certification, signed by a representative of the owner/operator, Vincent Racanelli, LCDR, Staff Civil Engineer, and an independent registered professional engineer, Charles A. Zeal, P.E., indicated that the subject hazardous waste management unit(s) had been closed in accordance with the plan approved by the Agency on April 21, 1993.

The subject hazardous waste management units were inspected by a representative of this Agency on February 24, 1994. The inspection revealed that the units listed below were closed in accordance with the approved closure plan. In addition, a review of the closure certification and accompanying closure documentation report also indicates that the units were closed in accordance with the approved closure plan. Therefore, the Agency has determined that the closure of the eleven hazardous waste container storage units listed below has apparently met the requirements of 35 IAC 725.

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- a. Building 38H Drug Screening Laboratory S01 Area
- b. Building 81H Naval Hospital S01 Area
- c. Building 104A Public Works Center S01 Area
- d. Building 220 Navy Resale Activity S01 Area
- e. Building 520 Service School Command S01 Area 2
- f. Building 520 Service School Command S01 Area 3
- g. Building 521 Service School Command Gun School S01 Area  
(see Building 521 note)
- h. Building 1212 Loading Dock S01 Area
- i. Building 1517 Warehouse S01 Area
- j. Building 1712 Maintenance S01 Area
- k. Building 3212C S01 Area

Building 521 Note: It should be noted that during any future excavation and/or construction at Building 521, the site safety plan must address worker exposure to the remaining soil contamination.

The Agency has modified your Part A application to reflect the fact that these units have been closed. Since the goal of GLNTC is to withdraw its Part A application, a revised Part A Application does not need to be submitted.

2. GLNTC must conduct additional closure activities at the following hazardous waste container storage units:
  - a. Building 105 Former Laundry S01 Area
  - b. Building 145 S01 Area
  - c. Building 415 Navy Exchange S01 Area
  - d. Building 520 Service School Command S01 Area 1
  - e. Building 912 Navy Resale Activity Laundry S01 Area

The term "closure activities" includes further investigation including the collection and analysis of additional soil samples to determine the extent of soil contamination and as necessary remediation of the contaminated soil.

Additional discussion of these five units are provided in Condition 4 below.

3. Closure activities must be completed by October 1, 1994. 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 December 1, 1994. These dates may be revised if GLNTC finds that additional time is necessary to complete all required closure activities and demonstrates to the Agency that it is attempting to complete closure 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,

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backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity.

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 and waste residue 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 chronological summary of closure activities and the cost involved.
- g. A description of the sampling and analytical methods used including sample preservation methods and chain-of-custody information.
- h. Color photo-documentation of closure. Document 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:

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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. A description of all quality assurance/quality control procedures implemented and the results of these efforts.
7. Copies of the laboratory report sheets, including results of the analysis conducted on QA/QC samples.
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 above-referenced closure documentation report does not need the units which have completed closure (the eleven units listed in Condition 1 above).

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  
Permit Section/Hazardous Waste Branch -- #33  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

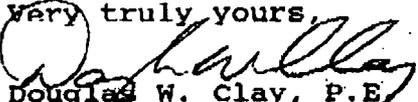
4. The following is a discussion of the five hazardous waste container storage units listed in Condition 2 above:
  - a. Building 105 Former Laundry S01 Area: Additional soil sampling shall be performed as necessary to determine the extent of soil contamination and to develop and implement an appropriate remedial action. Confirmatory soil samples should be analyzed for VOCs utilizing Method 8240 of SW-846.

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- b. Building 145 S01 Area: Additional soil sampling shall be performed as necessary to determine the extent of soil contamination and to develop and implement an appropriate remedial action. Confirmatory soil samples should be analyzed for PNAs utilizing Method 8310 of SW-846.
  - c. Building 415 Navy Exchange S01 Area: Additional soil sampling shall be performed as necessary to determine the extent of contamination to develop and implement an appropriate remedial action. Confirmatory soil samples should be analyzed for VOCs utilizing Method 8240 of SW-846.
  - d. Building 520 Service School Command S01 Area 1: The Agency has determined that this unit should not be allowed to clean close without any further investigation due the levels of PNAs detected. Therefore, additional soil sampling shall be performed as necessary to determine the extent of soil contamination and to develop and implement an appropriate remedial action. Confirmatory soil samples should be analyzed for PNAs utilizing Method 8310 of SW-846.
  - e. Building 912 Navy Resale Activity Laundry S01 Area: Additional soil sampling shall be performed as necessary to determine the extent of soil contamination and to develop and implement an appropriate remedial action. Confirmatory soil samples should be analyzed for VOCs utilizing Method 8240 of SW-846. Although the proposal to separate the outside and inside areas into two distinct units is disapproved, no further soil sampling needs to be conducted at this time at the outside area except where soil samples are necessary to determine the extent of a potential wide-spread contaminated area (i.e. soil samples should be collected to the north of soil sampling location GL93-912S-52).
5. All referenced to SW-846 are to "Test Methods for Evaluating Hazardous Wastes, Third Edition".
  6. Except as modified by this letter, closure activities should be carried out in accordance with this Agency's closure plan approval letter dated April 23, 1993 (C-689).

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

Very truly yours,

  
Douglas W. Clay, P.E.  
Hazardous Waste Branch Manager  
Permit Section, Bureau of Land

DWC:mah

cc: Charles A. Zeal, P.E. -- RUST Environmental  
Harold McGill -- Department of the Navy/Southern Division