



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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April 25, 2006

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

Re: Thermal Remediation Services Air Discharge  
Request for the ERH System at Building 105  
Naval Station Great Lakes  
Great Lakes, Illinois

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 submitted Air Discharge Request for the Electrical Resistance Heating (ERH) System to be installed at Building 105 at Naval Station Great Lakes. It was drafted by TRS, Inc. and submitted via electronic mail by Tetra Tech NUS. It was dated April 5, 2006. The Agency has reviewed the submittal and is providing the following information to be used in the operation of the ERH system.

It should be noted that an official Air Permit for this site is not required as it is a Comprehensive Environmental Response, Compensation, and Liability Act site where the response is occurring entirely on-site. However, the substantive parts of such a permit are required to be complied with, nonetheless.

Illinois EPA has identified the following as actionable location and chemical-specific ARARs and TBC guidelines for this project:

*35 Illinois Administrative Code (IAC) Part 245: Odors:* Specifically those provisions regarding the detection of objectionable odors.

The operator is required to control and mitigate any objectionable odors at the site.

Organic Material

35 IAC Section 218 Subpart K. *Use of Organic Material*: These provisions establish a generic organic emission limitation (i.e., a limit of less than 8 lb/hr) or require the installation of a control device.

The Illinois EPA - Bureau of Air concurs with the stipulations outlined in the submittal. These include but are not limited to the following:

- a. The operator is prohibited from bypassing the air pollution control system (i.e., condenser and granulated charcoal filter) until VOC air emissions reach, and are confirmed to be at, a discharge level of 6 pounds per hour or less.
- b. The operator is required to monitor for the constituents of concern and determine emissions as stipulated in the above referenced submittal.

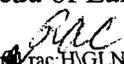
Along with the Air Discharge Request, an additional request was submitted to re-introduce treated condensate to the subsurface during the ERH remediation system operation. Illinois EPA has reviewed that submittal as well and concurs with the process outlined there. The only point the Agency would like to highlight is that the treated condensate requires confirmation sampling prior to being re-introduced into the subsurface to ensure the contaminant concentration levels are consistent with what was predicted (non-detect levels). Should the contaminant concentrations exceed expectations, Illinois EPA should be consulted to determine the appropriate course of action for proper disposal of the condensate.

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*

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

BAC: rac:H\GLN\TC\Site 22 related\ERHairpermitltr

cc: Bob Davis, Tetra Tech NUS, Inc.  
Howard Hickey, US Navy - EFA Midwest  
Owen Thompson, USEPA (SR-6J)