

**RESPONSE TO COMMENTS  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
JULY 16, 2007  
PROPOSED PLAN FOR SITE 22  
NAVAL STATION GREAT LAKES**

August 17, 2007

N00210.AR.000330  
NTC GREAT LAKES  
5090.3a

1) **About This Document** – Obviously, the dates listed here and elsewhere in this document for accepting public comments will need to be updated.

***Response:*** *The document will be changed to indicate the public comment period is from February 4 to March 5, 2008 and the postmark date for the comments will be March 5, 2008. In addition, in the section Next Steps the September 2007 date will be changed to May 2008 anticipating a signed ROD by then.*

2) **Facility Description** – The last sentence mentions the intent to close the hazardous waste storage area through the Resource Conservation and Recovery Act (RCRA) program. It does not discuss the intent to close the site out under CERCLA or how these two programs interrelate at this site. There should be a brief explanation of why the site was investigated, remediated, and closed under CERCLA, while also complying with the closure requirements under RCRA.

***Response:*** *The following sentence will be added to the end of this section: "Because of the historical operations at the site and the fact that the majority of the contamination was not necessarily associated with the RCRA storage unit, the investigation, remediation, and closure are being conducted utilizing CERCLA guidance; however, because of the RCRA storage unit at the site, closure will also comply with RCRA guidance."*

3) **Site Description** – As above, this section should explain why the closure of this site will be handled under both programs.

***Response:*** *The last sentence of the second paragraph will be deleted and the following sentence will be added at the end of the second paragraph: "Because a large portion of the contamination associated with this hot spot was believed to be due to the building floor drains and grease catch basin utilized as part of the historical dry cleaning operation (and not the RCRA storage unit itself), the investigation and remediation were conducted utilizing CERCLA guidance. Because of the presence of the RCRA storage unit, the Illinois EPA is requiring cleanup of this contamination to allow closure of that unit; therefore, closure of the site will meet both the CERCLA and RCRA requirements."*

4) **Site Description** – The discussion in the second paragraph should explain that the hotspot near the southeastern corner of the building (grease trap) was related to the dry cleaner, rather than the RCRA storage facility.

***Response:*** *See the response to Comment 3 above.*

5) **The Proposed Cleanup Plan** – It should also state here that a Land Use Control Implementation Plan (LUCIP) for this site will be appended to the Land Use Control Memorandum of Agreement (LUCMOA) between the Navy and Illinois EPA to ensure the restrictions will be applied and enforced until they are no longer required.

***Response:*** *The following sentence will be added to the end of this section: "A LUC Implementation Plan will identify the restrictions for this site and will be appended to the LUC Memorandum of Agreement between the Navy and Illinois EPA to ensure the restrictions will be applied and enforced until they are no longer required".*

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6) **Summary of Site Risks** – In the last paragraph, it is stated that the estimated cancer risk value for future occupational workers of  $1.1 \times 10^{-6}$  is less than the U.S. EPA's target risk range and the Illinois EPA's goal of  $1 \times 10^{-6}$ . This is inaccurate. A value of  $1.1 \times 10^{-6}$  is within the U.S. EPA's target risk range and slightly above Illinois EPA's goal of  $1 \times 10^{-6}$ .

***Response:*** *The description of risk will be modified. The estimated cancer risk is shown in Table 4-3 of the ERH Treatability Study Report as  $1 \times 10^{-6}$ . This is rounded down from the calculated value of  $1.1 \times 10^{-6}$ . According to EPA guidance, the rounded value (in this case  $1 \times 10^{-6}$ ) is utilized for comparison to the risk criteria. In this manner, there is no difference between  $9.5 \times 10^{-7}$ ,  $1.1 \times 10^{-6}$ , and  $1.4 \times 10^{-6}$ . They all are rounded off to  $1 \times 10^{-6}$  and are considered acceptable.*

*Therefore, this portion of the sentence will be re-written as: "...and future occupational workers ( $1 \times 10^{-6}$ ) are acceptable when compared to the U.S. EPA target risk range and the Illinois EPA goal of  $1 \times 10^{-6}$ ." Additionally, all other risk values in this section will be rounded to one significant digit.*

7) **What's a Formal Comment** – This section needs to inform the public that they have the ability to request a 30-day extension to the public comment period. It should also tell them how to request such an extension.

***Response:*** *The following changes will be made to the section. The first sentence of the second paragraph will be moved to the end of the first paragraph. The following sentence will start the second paragraph: "A request for an extension of the public comment period (minimum of 30 days) must be made in writing." The last sentence of the paragraph will be changed to "...requests for a public meeting or an extension of the public comment period should..."*

*Note – other minor changes were made to the document based on comments from the Navy and comments on the ERH Treatability Study Report.*