U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
OFFICE OF RESPONSE AND RESTORATION
ASSESSMENT AND RESTORATION DIVISION
Region 5 (SR-6J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

29 January 2009

EPA Region 5 Records Ctr.
313855

Kevin Adler, Remedial Project Manager
U.S. Environmental Protection Agency
Region 5 SR-6J
77 West Jackson Boulevard
Chicago, IL 60604

Dear: Mr. Adler

RE: Proposed Plan, Waukegan Harbor, Outboard Marine Corp. (OMC) Superfund Site

The National Oceanic and Atmospheric Administration (NOAA) has reviewed the subject document, which presents the remedial alternatives under consideration for the Waukegan Harbor portion of the OMC site. NOAA's technical review focused on the protection of aquatic natural resources and the services provided by those resources. As noted in my 16 May 2008 Memorandum to you that provided remedial considerations for the Waukegan Harbor OU, NOAA supports remedial actions that will protect human health and the environment, while not precluding future operational maintenance of the federal navigation channel.

The combination of process options that EPA has assembled for its environmental dredging followed by sand cover, Option D2, provides the best combination of risk reduction and permanence, while reducing cost through on-site dredge material management and dredge water treatment. The selection of hydraulic dredging facilitates efficient on-site transport of dredge material through a hydraulic pipeline, eliminating both the on-site transportation costs and risks associated with physical transfer and trucking. Inclusion of on-site management of the dredge material also eliminates potential risks associated with haul-truck traffic through Waukegan, which is a previously stated concern raised by the City in association with the project. The proposed treatment of the dredge water with subsequent discharge back to the harbor is both environmentally protective and cost effective. In addition, inclusion of a sand cover incorporates best management practices for addressing dredge residuals.

Dredging PCB-contaminated sediment that is greater than or equal to 1 part per million (ppm) will yield a remedy that is both ecologically protective and protective of the services provided by the resources such as recreational fishing and safe navigation. The 1 ppm PCB dredge target will result in an approximately 250 part per billion (ppm) surface-weighted average concentration, which represents a permanent remedy with respect to the PCB contamination in harbor sediment by minimizing areas that would be capped. Since contamination remains in place under capping scenarios, capping does not provide a permanent remedy as the potential future risk of recontamination associated with potential cap disturbance is a concern for as long as the PCBs are present.

In addition to the lack of permanence, the capping scenarios evaluated would restrict harbor navigation depths in perpetuity. In the case of Alternative D3, Slip 4 would be restricted to a mid-channel depth of

as shallow as eight feet deep in perpetuity, thereby precluding transit of current and potential future deeper-draft recreational vessels. The scenarios evaluated in options D4 and D5 include capping areas within the federal navigation channel with proposed top-of-cap depths shallower than the Congressionally-authorized depth of 23 feet below Great Lakes Low Water Datum (GLLWD). Capping above the authorized depth would pose an unacceptable risk to navigation safety and is therefore not supported by NOAA. As discussed in NOAA's 16 May 2008 memo, implementation of alternatives including capping to elevations above 25 feet below GLLWD would require EPA to first request Congress to re-authorize the federal channel to shallower depths to accommodate cap placement.

NOAA has concluded that EPA's recommended alternative, Option D2, Environmental Dredging with Residual Sand Cover, as set forth in the Proposed Plan, will provide acceptable environmental and human health protections and will adequately address navigation concerns. As such, NOAA supports EPA's recommendation of Option D2 for remediation of the Waukegan Harbor OU.

NOAA appreciates the opportunity to provide input on the OMC Waukegan Harbor site and looks forward to maintaining the cooperative relationship with EPA toward our mutual goal of protecting and restoring our nation's natural resources. Please feel free to contact me at (312) 886-7527 if you would like to discuss these comments or if I can provide any clarification or additional information.

Sincerely,

J. Todd Goeks

J. Todd Goeks
Coastal Resource Coordinator