

STATE OF INDIANA

N00164.AR.000020
NSWC CRANE
5090.3a



INDIANAPOLIS, 46225

DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

105 South Meridian Street

November 3, 1986

Mr. James Hunsicker, 09245
Naval Weapons Support Center
Crane, IN 47522

Re: Closure Plan Third Technical Review
Notice of Deficiency
R-150 Tank Site
Naval Weapons Support Center
Crane, Indiana
IN 5170023498

Dear Mr. Hunsicker:

This is to transmit the results of a third technical review conducted in regard to the closure of your R-150 tank site. Staff have completed a review of the additional information which you submitted May 22, 1986.

Please respond to the listed deficiencies within thirty-five (35) days of the date of this letter. An incomplete response will cause the State to modify your plan. This plan would then become the approved plan.

If you have any questions in regard to this letter, please contact Mr. Garry Mills of my staff at AC 317/232-3242.

Very truly yours,

Terry F. Gray

Terry F. Gray, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

GLM/baw

Enclosure

cc: Mr. Hak Cho, U.S. EPA, Region V
Mr. Pat Vogtman, U.S. EPA, Region V

Reference

Enclosure (4)

Notice of Deficiency
Third Technical Review
R-150 Tank Closure Plan
Naval Weapons Support Center
Crane, Indiana
IN 5170023498

Chemistry Review Deficiencies

1. It was reported that the tank was located 15 feet under the surface of the soil. Soil samplings should have been taken at this depth and lower as specified in item 10 of the Geology Review, Notice of Deficiency, Second Technical Review. To emphasize another statement in item 10, "sample at five foot intervals" means that samples should be taken from specific depths instead of five foot core composites. Also, several sample locations should be chosen randomly from a grid system.
2. There should be more than one background sample taken from each soil horizon.
3. The validity of the analytical results are in question due to the fact that there is no documentation on the sampling methods utilized. This is also true in the case of soil samples 5, 6, and 7 where there is only a general sampling description. There are several concerns pertaining to the sampling methods. Two of which are that due to excessive sampling handling (composites of five feet) and the choice of sample containers the effect might be a loss of volatile organics.
4. A detailed explanation of the sampling methods utilized should be submitted on all subsequent sampling episodes.
5. Provide all quality control data necessary to verify the precision and accuracy of the analytical results on all subsequent analyses.

Geology Review Deficiencies

1. Crane needs to submit groundwater elevations at each sampling interval along with the analysis. Crane will also be responsible for submitting a groundwater elevation contour map annually for evaluation.
2. The Geology Section will recommend approval of the closure plan upon a satisfactory evaluation of the new data forthcoming from the new borings and monitoring wells along with their satisfying the above mentioned requirements.

MEMORANDUM TO FILE

FILE # R-150 Facility File

SUBJECT: R-150 Tank Closure Plan - Meeting with Indiana Department of Environmental Management (IDEM) personnel to discuss 3rd technical review on 11-14-86

ORIGINATOR: James Hunsicker

DATE OF RECORD: 11-17-86

=====
This meeting was held in IDEM Offices in Indianapolis to discuss deficiencies noted/found on 3rd technical review of closure plan for R-150 Tank.

Each deficiency was reviewed and my concerns relayed to IDEM personnel (see attachment (1)) at this meeting.

Chemistry Review Deficiency #1 I indicated to the IDEM personnel that the samples we collected were composite samples from each five foot and that was the way we interpreted the requirements outlined in 2nd technical review. I told them in our opinion this would give more accurate results of contamination there than at five foot depths which could possibly miss contamination. Also their 3rd review indicates we should sample at several locations. I contested that statement because it contradicts statements in 2nd review where IDEM tells us how many wells and core boring to install.

I indicated we followed guidance as they had outlined in 2nd technical review and to go back now and start clarifying and adding more requirements was not fair to the Center since most of this work has been done. I indicated to Mr. Mills, Mr. White and Mr. Miller that this time no work would be done until 4th technical review was done. And if we were required to do this additional work that we would want it in writing since it contradicts the 2nd technical review. I discussed the cost of redoing this work since initial work cost was approximately \$2,800.00 per well. We're looking at another \$18,000.00 to \$20,000.00 plus more sampling and analysis cost if we have to redo this work.

We discussed Chemistry review deficiency #2 and the fact that it contradicts information put out in deficiency #1.

I feel the work we have done answers/meets their requirements and I indicated this in our discussions. Before the meeting adjourned they agreed we did have reason to question 3rd review and deficiencies. Mr. Charles White indicated he had not been

involved in either of the first two technical reviews and I have a feeling that he really didn't look at/review the file very well before doing 3rd technical review.

They are to review the closure plan and all reviews and respond to us in writing as to what they are going to require. I advised Gary Mills that the Center would be requesting a 90 day extension on the December 8 1986 deadline so as to allow time to resolve these questions. He indicated there should be no problem with the extension.