



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

**236 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604**

JUN 29 1990

**CERTIFIED MAIL (P 185 141 065)
RETURN RECEIPT REQUESTED**

Commander M. L. Frey, CEC, USN
Public Works Officer
Department of the Navy
Naval Weapons Support Center (5090/H1.5.1, 0924)
Crane, Indiana 47522-5000

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**REPLY TO THE ATTENTION OF:
5HR-JCK-13**

**RE: Modified RFI Phase III Work Plan
Naval Weapons Support Center
Crane, Indiana
IN5 170 023 498**

Dear Commander Frey:

The United States Environmental Protection Agency (U.S. EPA) has reviewed your Modified RFI Phase III Release Characterization Work Plan for ground water at the Ammunition Burning Grounds, dated April 20, 1990. Please be aware that the modification of the work plan allowed the previous geologic reports to replace the Phase III environmental setting requirements, it did not allow the deletion of other Phase III requirements. Our deficiencies are listed in Attachment I. Submit a revised Modified RFI Phase III Work Plan to this office, within 45 days of the date of this letter. The time schedule may be submitted separately before the rest of the revisions in order to get a partial approval to continue work.

If you have any questions regarding this matter, please contact Ms. Carol Witt-Smith of my staff, at (312) 886-6146 for assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "George J. Hamper".

George J. Hamper
Acting Chief
RCRA Permitting Branch

Enclosure

cc: Jim Hunsicker, USNC
Jeff Ciocco, North NAVFACENCOM
Bill Murphy, WES
Dan Sparks, U.S. Fish & Wildlife Services
Tom Linson, IDEM

Attachment I

Comments on the Modified RFI Phase III Work Plan for Ground Water at the Ammunition Burning Grounds Naval Weapons Support Center

1. Time Schedule

The time schedule needs to be updated. Show that the geologic survey field work has been completed. Show that the tracer report and new work due dates have moved.

2. Phase III Work Plan Missing Items

Even though the work plan is to concentrate on ground water issues, and the U.S. EPA accepted a previous geologic report to replace the geologic summary required in Phase III, Condition III.2.a.(1), it did not allow the Permittee to delete other requirements of Phase III. The following items need to be addressed and included in the work plan:

a. Condition III.C.1.a. of Attachment III in the Permit

The Permittee must include a Project Management Plan. This plan will outline RFI objectives, technical approach, personnel, budget, and schedules. Only a schedule was submitted. This was not sufficient.

b. Condition III.C.1.b.

The Dye Tracer Test replaced the Sampling and Analysis Plan temporarily. The second test will need an explanation of the project and referenced to methods already approved in the first test. Eventually, after flow is defined from the second test off-site, a sampling and analysis plan will be necessary, once the monitoring points are established, for long term monitoring. The Permittee should use the permit requirements to guide him on what needs to be submitted.

c. Condition III.C.1.c.

Since construction of the wells occurred previously, this requirement does not apply at this time.

d. Condition III.C.1.d.

QA/QC requirements apply as described in 2.b. above.

e. Condition III.C.1.e.

A Data Management Plan shall be developed to document and track the ground water investigation. This shall include tracer testing and results and report writing formats.

f. Condition III.C.1.f.

A Health and Safety Plan must be supplied for ground water investigation activities.

g. Condition III.C.3.

The Permittee shall include in the work plan that this condition will be fulfilled.

h. Condition III.C.4.

The Permittee shall include in the work plan that this condition will be fulfilled, not just putting it in the time schedule.

3. The work plan should be written as a "plan of attack," how the Permittee will go about performing and managing the investigation.