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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 5**  
**230 SOUTH DEARBORN ST.**  
**CHICAGO, ILLINOIS 60604**

**JUL 27 1990**

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

CERTIFIED MAIL (P 352 932 395)  
RETURN RECEIPT REQUESTED

Commander M. L. Frey, CEC, USN  
Public Works Officer  
Department of the Navy (5090/H.1.5.1, 0924)  
Naval Weapons Support Center  
Crane, Indiana 47522-5000

RE: RFI Phase II Soils 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 the RFI Phase II Soils Work Plan for the Old Rifle Range, dated July 6, 1990. Enclosed are our comments on areas that need to be revised. Please submit a revised work plan to this Agency within 30 days of the date of this letter.  
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If you have any questions regarding this matter, please contact Ms. Carol Witt-Smith of my staff, at (312) 886-6146 for assistance.

Sincerely,

*Lisa A. Pierard*

Lisa A. Pierard  
Acting Chief  
RCRA Permitting Branch

Enclosure

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

Comments on the  
RFI Phase II Soils Work Plan  
for the Old Rifle Range  
Naval Weapons Support Center

1. Page 3, section 1.1.3, line 5  
Add "to" after "moved."
2. Page 3, section 1.2.1, line 3  
"Place" should be "placed."
3. Page 3, section 1.2.2, line 3  
"Part B" should be "storage operating."
4. Page 3, section 1.2.2, line 4  
"Assessment (RFA)" should be "Investigation (RFI)." The U.S. EPA performed the RCRA Facility Assessment.
5. Page 4, section 1.2.2, line 3 from the top of the page  
"Equivalent" should be added after "RFA." Add "identify if a release has or has not occurred" after "Phase II."
6. Page 4, section 1.2.2  
The Permittee should make this paragraph clearer. Identify that you are only discussing Solid Waste Management Units (SWMUs) requiring Phase II Soil investigations, not all SWMUs on-site.
7. Figure 1.1.2  
Identify north on the map.
8. Page 8, section 2.2.1, line 5 and section 2.2.3, line 1  
Change "disposal" to "treatment."
9. Page 11, section 2.3.2 and diagram 2.3.2  
Progress reports should be identified in the schedule.
10. Page 14, section 3.1.1, line 2  
Change "disposal" to "treatment."
11. Page 14, section 3.1.3, line 3  
Change "disposal of" to "treat."

12. Pages 14 and 15, section 3.1.3

Further explanation and references are necessary to delineate waste types, codes, and manufacturing processes for where the waste came from. This list then must be used to determine if Appendix IX constituents may be deleted. A statement with no backup information is not a sufficient demonstration. The Permittee should follow the same type of procedures listed in 40 CFR §264.93, for deleting constituents in ground water sampling.

13. Table 3.1.3

The explosives list must be expanded for all the parameters tested for using the Army explosives method.

14. Figures 3.1.2a and 3.1.3b

Identify: north, the scale units, the background wells and soil boring locations, the boundary of the unit, any topography to the area. Correct the use of duplicate identification numbers (i.e., 07/09-7-90.) A site map must be consistent with the requirements of RFI Phase I in Attachment III of the permit.

15. Page 18, section 3.2.1 and Figure 3.2.1

The following sampling intervals must be used: 3-6", 12-18", 18-24", 36-42", and at the interface with bedrock. If contamination is evident or suspected in other areas in the core not being sampled for analysis, a field decision will be made to take a sample of the suspected contamination for analysis.

A description of how cores will be handled must be given.

16. Page 20, section 3.2.4, lines 42-45

Backfilling with drill cuttings alone is not allowed. Open boreholes must be filled with a material of the same or lesser permeability than the surrounding soil. The Permittee may make a field judgment on which portions of the drill cuttings may or may not be contaminated (i.e., based on contamination suspected at the surface and not at depth); and may mix uncontaminated cuttings with a bentonite slurry to seal the borehole. Otherwise, a bentonite or bentonite-cement seal should be used. The Permittee should not allow contaminated soil to impact another zone or allow a highly permeable zone to be created. If soil is confirmed to be derived from or mixed with a listed or characteristic hazardous waste, and is removed, it should be handled as a listed or characteristic hazardous waste. If drill cuttings are left at the site, while waiting for analysis, they should be drummed or covered in plastic.

17. Page 22. section 3.3.0

A description of how decontamination waters, while be handled and disposed of, must be included.

18. Soil Sampling QA and the Generic Work Plan

Comments on these areas were previously sent to the Permittee by the U.S. EPA, in a letter dated July 11, 1990.

19. Data Management Plan

a. Section 6.4.0

Change "contaminate" to "contaminant."

b. The DMP must include a section on bimonthly (every 2 months) progress reports.

c. Photo documentation must be provided and discussed.

20. Geologic Summary

A summary of the available geologic information should be included. This information should be used to prepare the sampler for expected conditions and the siting of background locations.

21. Backgrounds

Attachment III, Phase II Soil Investigations states that a minimum of 3 background samples per soil horizon must be taken.

22. Health and Safety Plan

The Permittee must fill in the blanks under emergency information, Section 7.