



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN. 21 1996

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Mr. G.K. Hill
Public Works
Department of the Navy
Naval Surface Warfare Center
300 Highway 361
Crane, Indiana 47522-5001

REPLY TO THE ATTENTION OF:
DRP-8J

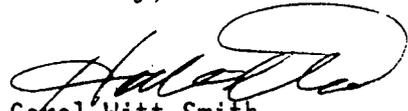
RE: Draft Operational Plan
Bioremediation Facility
Naval Surface Warfare Center
Crane, Indiana
IN5 170 023 498

Dear Mr. Hill:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the Draft Operational Plan for the Bioremediation Facility, dated March 15, 1996. Enclosed are our comments regarding the plan. The plan must be revised to incorporate the new proposed mixes. Overall, the plan does not include extensive details on the step-by-step process. It appears much more generalized. Please submit a revised Operational Plan within 30 days of the date of this letter. This time-frame is consistent with your request to keep this project on a fast-track. We will make every effort to meet your review needs.

If you have any questions regarding this matter, please contact me at (312) 886-6146.

Sincerely,


for Carol Witt-Smith
Corrective Action Expert
IL/IN/MI Permitting Section

Enclosures

cc: Tom Brent, NSWC ✓
Jim Hunsicker, NSWC
James May, ACOE-WES
Adrienne Wilson, SOUTHDIV
Allen Debus, WMB
Mario Mangino, WMB
Colleen Olsberg, WMB
Dan Mazur, WMB
John Manly, IDEM
Tom Linson, IDEM
Mike Sickels, IDEM

Attachment
Comments on the Draft Operational Plan
for
SWMUs #03/10, 10/15, 12/14, 13, 14 and
Soils Bioremediation Facility
Dated March 15, 1996

1. Page 4, Section 1.3.3 Phase III

Since there was no significant reduction in HMX observed during the bench scale test, and HMX exists at the Solid Waste Management Units (SWMUs), what is the Navy proposing to reduce the HMX concentrations?

2. Page 5, Waste Classification

The mixture of excavated soil may also be considered a media contaminated with K047.

3. Page 5, QAPP

When is the revised Quality Assurance Project Plan (QAPP) specifically for this operation going to be submitted?

4. Page 6, Item 4.

Add "40 CFR 264, Subpart S Corrective Action."

5. Page 7, Section 3.1 Compost Building Area

Add at the end of the first sentence: "...or as amended in the approved plans." Since there are some minor design changes being made.

6. Page 9, Section 4.0 Schedule

Modify the current schedule since the project was delayed in order to get State approval of the area.

7. Page 14, Section 5.1 Pilot-scale Operation

Modify this entire section. As discussed with SOUTH DIV the mixes should include wood chips, and chicken manure would be tested. It is our understanding that the following mixes would be used in the pilot-scale:

8. Page 15, Table 5-1 Pilot-scale windrow recipes

This table needs modification. See comment 7 above.

9. Page 15, Section 5.1.2 Pilot-scale Contingency Plan

What about the HMX level? How can we get more reduction?

10. Page 17, Section 5.2.1 Soil Excavation and Screening
 - a. At ABG, a metal screening shall be necessary.
 - b. A design of the screening equipment, proposed location at each unit, and methods to reduce spillages should be included.
 - c. Truck routes should be identified from each unit.
 - d. How will the stockpiles be contained? Show the proposed locations at each unit.
 - e. Where will the soil be spread for drying?
Will it be contained?
 - f. All rocks should be cleaned and used as a natural material. A rock should not be considered a solid waste. Confirmation sampling of wash waters can prove cleanliness.
 - g. A layout of the proposed excavation areas should be included in the operational plan.
11. Page 18, Section 5.2.4 Load Amendment Blend into Windrow
The manufacturer must be identified and include a copy of the design of its windrow.
12. Page 19, Section 5.2.6 Turn/Mix Windrow
Why won't the mixing be more frequent later in the test, to reduce the overall treatment period?
13. Page 21, Section 6.1 Analytical Services
The U.S. EPA must still review the QAPP and the laboratory must be identified.
14. Page 21, Section 6.1.1 Field Screening Services
Why are metals deleted? The U.S. EPA and the State previously expressed concerns about documenting the metals concentrations. Metals must be tested at least at the end of the treatment prior to disposal.
15. Page 22, Section 6.2.1
Make sure the current NPDES permit will allow the wash liquids to be sent to the wastewater treatment plants.
16. Page 23, Section 6.2.1
 - a. Will the wash water be tested?

- b. This rock use description is different than previously stated in the plan. We agree with use as a natural material.

17. Page 23, Section 6.2.2

Any sediment built up in the truck wash will be sent to composting or the solid waste landfill.

18. Page 24, Section 6.3.3

Make sure that the use of NPDES pretreatment plants is approved by the Water program.

19. Page 26, Section 7.2.3

At what point does calibration occur? Each day before use/

20. Page 26, Sections 7.24 and 7.25

Explain why TOC and Nitrogen are only sampled at the beginning of mixing and no other time.

21. Page 27, Section 7.2.7

- a. Add "U.S. EPA SW846" before "Method 8330."
- b. Analyses should match what we are finding for contamination at each unit.
- c. Chart different lists for each area of cleanup.
- d. For ABG, TCE and metals in the soil needs to be addressed.
- e. Make sure sampling includes metals analyses to ensure no TC wastes were formed.

22. Page 28, Section 8.0

Don't refer to the general QAPP. A site-specific plan is being created.

23. Page 28, Section 8.1

"Other methods" must be approved.

24. Page 30, Section 8.3

A map showing all excavation levels and sample locations shall be made for the report.

25. Page 30, Section 8.3.1

- a. In areas of shallow bedrock, soil excavation will stop at the bedrock.
- b. Add details when ABG cleanup will begin on how the current operations will be modified to adjust for excavation of areas and backfilling.

26. Page 31, Section 8.3.2

Show the proposed layout of the excavation and grid.

27. Page 32, Table 8-1

- a. What about adding HMX testing?
- b. Add confirmation sampling to the chart.
- c. Note that the methods are from SW846.
- d. List the TCLP metals methods specifically.

28. Page 35, Section 10.0

- a. The revised safety plan needs to be submitted.
- b. "Data" is misspelled in paragraph 2.

30. Page 40

Justify why wipe tests will be accurate enough to verify cleanliness.