



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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January 20, 1998

Mr. Tom Brent
NSWC Crane
B-3260 Code 09510
300 Highway 361
Crane, IN 47522

Dear Mr. Brent:

Re: Draft Work Plan for Phase II Groundwater
RCRA Facility Investigation (RFI), Solid
Waste Management Unit (SWMU) 30 -
Landfarm, Naval Surface Warfare Center
(NSWC), Crane IN

To expedite document review, EPA, Region V has requested that staff of the Indiana Department of Environmental Management review the Draft Work Plan RFI for SWMU 30. Our review of the RFI generated the following comments:

Sampling and Analysis Plan

Specific Comments

Figure 1-3: The boundaries of the landfarm must be included on this map.

Page 1-6, Paragraph 1: There is no Figure 2-1 as referenced. This paragraph also states that sludge application was moved from the site to another location immediately east of the site. The new location should be shown on Figure 1-3.

Page 1-11: The reasoning for the conclusion that the groundwater at the site is under "confined or semi-confined" conditions must be explained further, including a definition of the two conditions.

Page 1-14: "If Then" Chart: The proposed statistical method(s) to determine whether a parameter concentration is insignificant relative to background must be presented. Also, all assumptions

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and requirements of the method(s) must be stated.

Section 2.3.2: The use of the terms "development" and "redevelopment" are confusing in this section. One term or the other should be used throughout this section.

Page 2-4, Paragraph 4: Redevelopment techniques should not only be designed to re-open the screened interval, but also to remove as much sediment as possible from the monitoring well. If significant sediment is present in the well, one hour of overpumping followed by measuring the thickness of the sediment in the well is insufficient. Efforts must be made to remove all sediment from the well. Additional redevelopment methods including the use of bailers, surge blocks, forced air, or similar techniques may be necessary to achieve this goal.

Page 2-7, Table 2-2: There is no Figure 2-3 as referenced. The terms "n/a" and "IDW Sample" should also be defined in the table.

Page 2-14, Section 2.5: This section does not discuss equipment (i.e. field instruments) decontamination procedures between wells. These procedures should be discussed, including a list of items anticipated to require decontamination. Also, the paragraph regarding electric power to the site does not seem appropriate in the decontamination section.

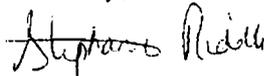
Appendix A: The designs of the monitoring wells at this site do not meet the Indiana rule for monitoring wells (IAC 310 16-8-3). The filter pack is not to exceed two feet above the top of the screened interval. All seven of these wells have filter packs which extend more than two feet above their screened intervals. Future wells installed at this site must adhere to all monitoring well design rules.

Quality Assurance Project Plan

Page 7-2, Section 7, Table 7-1: Superscript #2 references SW-846 and should end with "and subsequent updates." Superscript #3 needs to be completed. Method 8080 as listed in Table 7-1 has been deleted from SW-846; it has been replaced with 8081A. Please update this and any other table which may be affected by this change.

The Health and Safety Plan should be implemented in accordance with OSHA requirements. If you have any questions regarding the above comments, please contact me at (317) 308-3367.

Sincerely,



Stephanie Riddle, Project Manager
Defense Environmental Restoration Program
Office of Environmental Response

SR:mg

cc: Rex Osborn, IDEM
Carol Witt-Smith, USEPA
James Hunsicker, NSWC Crane