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

AUG 04 1999

REPLY TO THE ATTENTION OF:

DW-8J

Ms. Christine Freeman
Naval Surface Warfare Center
EPD, Code 095 B-3260
300 Highway 361
Crane, IN 47522-5001

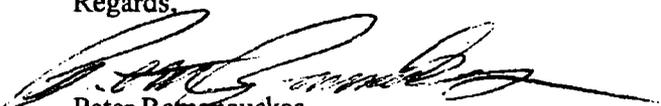
Re: Backfilling of Reject Gravel at
Mine Fill A, Grids 27 & 28

Dear Ms. Freeman:

The United States Environmental Protection Agency (U.S. EPA) hereby approves your August 2, 1999 request to backfill reject gravel from operations at the Mine Fill A Solid Waste Management Unit (SWMU) into excavation grids 27 & 28 at Mine Fill A. The U.S. Navy shall meet the required field documentation for the backfilled gravel in these grids.

If you have any questions regarding this matter, please contact me at (312) 886-7890.

Regards,


Peter Ramanauskas
Environmental Engineer
WMB, IL/IN/MI Section

cc: Bill Gates, SOUTHDIV
Lance Parsons, TolTest, Inc.

From: Freeman Christine D CNIN

Sent: Wednesday, August 04, 1999 9:05 AM

To: Peter Ramanauskas (E-mail)

Cc: William H. Gates (E-mail); Lance Parsons (E-mail)

Subject: FW: Gravel Backfilling

Peter,

Attached is TolTest's response that addresses your first two questions. In regard to your third question, material backfilled & grids marked as contaminated would be addressed in the future, since this is an Interim Measure the Navy never intended to remove all the contamination and feels comfortable leaving contamination in place that if removed would undermine structures. A final cleanup will be done when the buildings are demolished or a Risk Assessment determines there is a risk. I hope these responses are satisfactory.

-----Original Message-----

From: Lance Parsons (SNIP) [mailto:lance@crane.navy.mil]

Sent: Tuesday, August 03, 1999 5:16 PM

To: Freeman Christine

Cc: Brent Robertson

Subject: Re: Gravel Backfilling

Christine,

The attached word document was prepared to address Peters concerns. Feel free to add to it or revise and forward to Peter. Hope this helps to alleviate Peters concerns.

Lance Parsons, NSWC TolTest Project Manager P.O. Box 629 Crane, Indiana 47522 (812) 854-6941

----- Original Message -----

From: PETER RAMANAUSKAS

To: <freeman_cd@crane.navy.mil>

Cc: <toltest@kiva.net>

Sent: Tuesday, August 03, 1999 12:36 PM

Subject: Gravel Backfilling

Christine & Lance,

I've got a few concerns regarding the backfilling of the gravel into Grids 27 & 28:

- 1) If excavation near the existing structures cannot proceed due to potential building collapse, I would like that stated in writing along with an explanation of why controls such as shoring are not practical.
- 2) Were other grids near existing structures (e.g. 3, 4, 23, 24, 25, 26, 32, 33, etc.. Figure E1-1 of the Full Scale Op Plan) excavated completely? If so, then why can't the same be done with #27/28? If not, are they marked "hot" also?
- 3) If this material were to be backfilled and the grids marked as "hot", the areas would still need to be addressed at some time in the future. Does the Navy feel that it can be handled later, or would it be more practical to clean as much up as is possible at this stage?

Thanks! Let me know.

Pete



**Naval Surface Warfare Center (NSWC) Crane, IN.
Bio-Remediation Facility
Deliver Order FC03**

Page 1 of 1

TO: Peter Ramanuskas
FROM: Lance Parsons (Project Manager)
DATE: August 2, 1999
SUBJECT: Backfilling of Reject Gravel at Mine Fill A, Grids 27 and 28

Excavation of contaminated soil at Bldg. 153 (and other buildings at MFA) has historically halted in certain cases despite the presence of contaminated soil. This process was started with Morrison Knudsen, Corp. and has continued with TolTest Inc. For instance, if contaminated soil is removed from a berm down to original grade and the blast wall footer is exposed, then excavation has stopped. This was precisely the case with grids 1,2,3,126, & 127. These grids were all excavated to original grade and post-excavation samples indicated that explosives contamination still exists.

Removal of additional contaminated soil would require (in this example) shoring up a 15 foot high concrete blast wall. Despite the obvious safety concerns, this type of activity is outside the scope of work for this interim measure and would require additional engineering, safety planning, and hazard analysis.

Other grids where contamination remains after excavation has halted include (among others) grids 4 and 134 due to the presence utility lines and diesel range organic contamination, or grid 17 where contamination is present below the railroad grade. Grids 27 and 28 are expected to be contaminated (post-excavation samples have not yet been obtained) because contaminated soil has been left in place to support the steam line that crosses these grids.

Removing or mitigating the impediments to allow for excavation of contaminated soil would entail activities which are outside the scope of work for this interim measure. Unless the scope of work includes removal of the structures (buildings, blast walls, railroad tracks, etc.), it is doubtful that all of the contaminated soil would be removed from the site.

Therefore, placing contaminated reject gravel into grids 27 and 28 would not be inconsistent with the scope of work for this interim measure or with past backfilling practices at MFA.