



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

REPLY TO THE ATTENTION OF:

October 6, 1999

DW-8J

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

RE: Percent Reduction Goal
Windrows 01 to 25
Request to Delete Day 0 /
90 - 99% Reduction Goal

Dear Ms. Freeman:

The U.S. EPA has reviewed the report entitled Summary of Percent Reduction Goal - Windrows 01 to 25. We apologize for the delay in addressing your request. The report was submitted in conjunction with a request to delete Day Zero / 90 - 99% Reduction Requirements.

The report is lacking in detail and is mainly comprised of windrow data results. Attached please find our comments on the report. Please address and incorporate these comments into this current report and all future Percent Reduction Goal Summary submittals (i.e., for Rockeye and ABG).

The report data shows that remediation goals are being achieved for Mine Fill A soils. Based on the report data and the knowledge that Mine Fill B has similar soil characteristics and similar contaminants, the U.S. EPA waives the need for the 90 -99 % reduction requirements / Day Zero testing for Mine Fill B. Pre-excavation sampling will be done with field test kits and 10 to 20% will be analyzed by Method 8330 for explosives (and any other explosives tests required). Pre-excavation samples will be analyzed to ensure that all other constituents of concern are not exceeding hazardous waste levels. Please be aware that Day Last testing of the treated soils is to continue without change to ensure that the treated soils leaving the Biofacility meet the established industrial or residential remediation goals using the established laboratory techniques. The final treated soil resting areas are to be tracked and logged.

The Day Zero sampling and 90 - 99 % Reduction requirements are not deleted for the remaining two SWMUs undergoing bioremediation (i.e., Rockeye and ABG). Once sufficient data is collected for the treated soil of each unit, the Navy may submit a request to suspend the requirements for each unit along with a supporting report, as was done for Mine Fill A.

If you have any questions or comments, please contact me at (312) 886-7890.

Sincerely,



Peter Ramanauskas
Environmental Engineer

Enclosure

File: Req to Delete.wpd

cc: Bill Gates, SOUTHDIV (w/ encl)
Tom Brent, NSWC (w/o encl)
Phil Keith , NSWC (w/o encl)
Doug Johnson, NSWC (w/o encl)
E.P. Johns, SOUTHDIV (w/o encl)

U.S. EPA COMMENTS
Summary of Percent Reduction Goal - Windrows 01 to 25
Naval Surface Warfare Center
Crane, Indiana

Comment 1:

The report is lacking in any structure or detail. The submitted information is basically all data. The report should include detailed descriptive sections such as: executive summary, introduction, procedures, analytical results, summary, conclusions, and other relevant sections.

Comment 2:

The analytical results section mentioned in Comment 1 should provide explanation for negative results (e.g., -223% TNT reduction and -20.18% 4A26DT reduction in M013) and any other anomolous data. There should also be an explanation provided for the variations in reporting limits within one sample set (e.g., S005 and S016 Day Last). Why does the reporting limit change in S016 for Day Last?