



DEPARTMENT OF THE NAVY

CRANE DIVISION
NAVAL SURFACE WARFARE CENTER
300 HIGHWAY 361
CRANE, INDIANA 47522-5000

IN REPLY REFER TO:

5090
Ser 095/0054

13 MAR 2000

U.S. Environmental Protection Agency, Region V
Waste, Pesticides, & Toxics Division
Waste Management Branch
Illinois, Indiana, and Michigan Section
Attn: Mr. Peter Ramanauskas (DW-8J)
77 West Jackson Blvd.
Chicago, IL 60604

Dear Mr. Ramanauskas:

Crane Division, Naval Surface Warfare Center (NAVSURFWARCENDIV Crane) submits for review and approval the Response to October 1999 Comments and Replacement Pages for the Interim Measures Report (IMR) for the Battery Shop, Solid Waste Management Unit (SWMU) 23/00 as enclosure (1). Additional copies of the replacement pages will be provided once the IMR is approved. The required certification statement is included as enclosure (2).

NAVSURFWARCENDIV Crane point of contact is
Ms. Christine D. Freeman, Code 09511, telephone 812-854-4423.

Sincerely,

A handwritten signature in cursive script, appearing to read "James M. Hunsicker".

JAMES M. HUNSICKER, DIRECTOR
ENVIRONMENTAL PROTECTION DEPARTMENT
BY DIRECTION OF THE COMMANDER

Encls:

- (1) Response to Comments/Replacement Pages SWMU 23/00 IMR
- (2) Certification Statement

Copy to: (no encls)
ADMINISTRATIVE RECORD
IDEM (D: Griffin)
MK Cleveland
SOUTHNAVFACENGCOM (Code 1864)
TolTest Crane

**NSWC Crane, Crane, Indiana
Interim Measures Report
Solid Waste Management Unit (SWMU) 23/00 Battery Shop**

RESPONSE TO COMMENTS

Commentor: Peter Ramanauskas, US EPA Region V

COMMENT 1: The report is lacking in sufficient detail.

RESPONSE 1: More detail has been provided in the report

COMMENT 2: Please prepare the final report with a similar format to the Addendum #1 Interim Measures Report, SWMU #16/16 - Cast High Explosive/Incinerator Building 146 Area dated August 1999.

RESPONSE 2: The final report has been prepared with a similar format to the Interim Measures Report (IMR) mentioned above.

Commentor: Christine D. Freeman, NSWC Crane

**GENERAL
COMMENT:**

This report is only one volume. Delete references to having two volumes. Be sure to incorporate Volume two material to the table of contents.

RESPONSE: All references to having two volumes have been removed from the report. Material previously in Volume 2 has been incorporated into the Table of Contents.

**GENERAL
COMMENT:**

To complete the "Zoom in " effect for the figures in Appendix A, Figure A-4 should be Figure A-3 and vice versa.

RESPONSE: Figure A-3 in Appendix A has been re-labeled Figure A-4 and Figure A-4 has been re-labeled Figure A-3.

**GENERAL
COMMENT:**

Please provide a list of references at the end of the report for those materials listed in the report.

RESPONSE:

A list of references as well as a bibliography has been included in Section 6.0 of the report.

COMMENT 1

p.1 ¶4:

Appendix D is listed before Appendix C. Please switch the order of these references or change Appendix D to Appendix C and vice versa.

RESPONSE 1:

The order of the references has been changed so that Appendix C is referenced before Appendix D.

COMMENT 2

p. 2 §1.0 ¶1:

Rewrite as, "... as shown in Figure A-1 of Appendix A, and ..."

RESPONSE 2:

The Site Description section is now Section 2.0. The reference to Figure A-1 has been rewritten in the second sentence of the first paragraph.

COMMENT 3

p. 2 §1.0 ¶2:

After discussions with Rumpke, a total of 4.59 tons of debris was disposed of not the reported approximate 2 tons. A copy of Rumpke's landfill weight ticket showing the disposal of the 4.59 tons of debris should be included as an attachment in Appendix E.

RESPONSE 3:

MK contacted the landfill on November 11, 1999 in an attempt to locate the correct weight ticket. Ms. Donna White, Office Manager, said that the records are stored on site however, it would be a time consuming and costly effort to try and locate a document from such a long time ago. The text has been changed to "approximately four and one-half tons" The reference appears in the Executive Summary ¶4, p. 2-1 §2.1 ¶2 and p. 5-1 ¶1

COMMENT 4

p. 2 §2.0

- a. Typographical error: "...metal cans, drums and chairs, tires, and battery components."
- b. Clarification is needed here in referring to a drawing labeled "sheet 2 of 2" because there are two maps in Appendix A labeled as, "sheet 2 of 2." The two maps have also been labeled "Figure A-5."

- RESPONSE 4:**
- a. The typographical error noted above has been corrected. The location is now Section 3.1, second paragraph.
 - b. The label of the first oversize drawing has been changed to "sheet 1 of 2."

COMMENT 5
p. 3 §4.0:

Rewrite last sentence as, "activities are presented in Table 1 and Appendix D." Otherwise, Table 1 is not referenced in the text.

RESPONSE 5:

The section noted above was modified in the report. A reference to Table 1 is now in Section 3.1, first paragraph.

COMMENT 6
p. 4 §5.0:

A table should be added to this section or in Appendix D to clarify and coordinate which sample results are covered by a certain rinse or trip blank rather than trying to decipher the chain of custody reports.

RESPONSE 6:

Table 4 was added to the text. The table includes a listing of the samples and their associated trip and rinse blanks.

COMMENT 7
p. 4 §5.0 ¶2:

The margins on this paragraph are not correct; it is indented.

RESPONSE 7:

This section of the report has been rewritten and is now Section 4.0.

COMMENT 8
p. 5 §8.0:

- a. In the first sentence, delete the space after the hyphen in the word "roll-off".
- b. Give more details as to which off-site landfill was used as the disposal location for the debris.
- c. A copy of the disposal ticket from the off-site landfill should be referenced and included as an attachment in Appendix E.

RESPONSE 8:

- a. Section 8.0 is now Section 3.4 in the rewritten report. The space after the hyphen has been removed.
- b. The name and location of the landfill has been added in Section 3.4, first sentence.

- c. A reference to the disposal ticket has been added to the text in Section 3.3, last sentence.

COMMENT 9

p. 5 §10.0:

- a. For ease in reviewing, add a column to Tables 2 and 3 showing the cleanup level.
- b. Delete hyphen: "... the presence of Methyl-Parathion near the ..."
- c. More detailed information needs to be discussed in this section. Section 2.0, which is entitled Characterization, contains a more detailed analysis summary than does this section.

RESPONSE 9:

- a. A column listing clean-up levels has been added to Tables 2 and 3.
- b. The hyphen has been removed from the word Methyl Parathion.
- c. A detailed analytical summary has been provided in the rewritten report as Section 4.0.

COMMENT 10

p. 5 §11.0 ¶1:

Reference which figure of Appendix A is the contour map.

RESPONSE 10:

The section noted above is now Section 3.5 in the rewritten report. A reference to the contour map, Figure A-5 sheet 1 of 2, has been added to the first paragraph, fifth sentence.

Commentor: Adrienne T. Wilson, SOUTH DIV

COMMENT 1: Please include in the Executive Summary that roll-off box debris was transported to a landfill off base.

RESPONSE 1: A reference that roll-off box debris was transported to an off-site landfill has been added to the 4th paragraph, 3rd sentence, of the Executive Summary.

COMMENT 2: Please include the quantity of debris that was removed from the site in the executive summary.

RESPONSE 2: The quantity of debris removed from the site has been added to the fourth paragraph, eighth sentence, of the Executive Summary.

COMMENT 3: In the future please do not send documents directly to the regulator unless specifically asked. The base, Tom Brent will provide documents to the regulators.

RESPONSE 3: Morrison Knudsen will not send comments to any regulator(s) unless directed to do so by the Navy.

INSTRUCTIONS FOR UPDATING DRAFT TO FINAL DRAFT

Instructions for updating *Volume I Draft Interim Measures Report, SWMU 23/00 - Battery Shop* dated September 5, 1996 to the Final Draft version of the report, dated January 2000 are provided below:

REPORT COMPONENT/PAGE	INSTRUCTIONS
Binder Spine	Remove and discard white spine from Volume I 3-ring binder, dated September 5, 1996, and replace with the attached white spine dated January 2000.
Binder Cover	Remove and discard white cover from Volume I 3-ring binder, dated September 5, 1996, and replace with the attached white cover dated January 2000.
Report Text	Remove and discard report text including cover sheet, table of contents, Executive Summary and sections 1.0 through 11.0 and replace with the attached text dated January 26, 2000 including cover sheet, table of contents, Executive Summary and sections 1.0 through 6.0.
Table 1	Remove and discard Table 1 and replace with the attached Table 1.
Table 2	Remove and discard Table 2 and replace with the attached Table 2.
Table 3	Remove and discard Table 3 and replace with the attached Table 3.
	Add the attached tabbed divider sheet labeled Table 4 after Table 3. Add the attached Table 4 after the tabbed divider labeled Table 4.
Appendix A cover sheet	Remove and discard the cover sheet for Appendix A and replace with the attached cover sheet and Drawing List sheet page A-1 and A-2.
Figure A-3	Remove and discard Figure A-3 from Appendix A and replace with the attached Figure A-3.
Figure A-4	Remove and discard Figure A-4 from Appendix A and replace with the attached Figure A-4.
Battery Shop drawing sheet 1 of 2	Remove and discard the Battery Shop drawing sheet 1 of 2 and replace with the attached Figure A-5 Battery Shop sheet 1 of 2
Battery Shop drawing sheet 1 of 2	Remove and discard the Battery Shop drawing sheet 2 of 2 and replace with the attached Figure A-5 Battery Shop sheet 2 of 2
Appendix B cover sheet	Remove and discard Attachment B cover sheet and replace with the attached Appendix B cover sheet page B-1 and the Regulatory Forms/Correspondence table of contents sheet page B-2.
Appendix C cover sheet	Remove and discard Attachment C cover sheet and replace with the attached Appendix C cover sheet page C-1 and Photographs table of contents sheet page C-2.
Appendix D cover sheet	Remove and discard Attachment D cover sheet and replace with the attached Appendix D cover sheet page D-1 and Analytical Results table of contents sheet page D-2.
Appendix E cover sheet	Remove and discard Attachment E cover sheet and replace with the attached Appendix E cover sheet page E-1 and table of contents sheet page E-2.
Appendix E text	Remove and discard the text sheet from Appendix E and replace with the attached text sheet page E-3.

5090
Ser 095/0054

13 MAR 2000

The letter Ser 095/0054 was for the
submittal of replacement pages for the
Final Draft Interim Measures Report for the
Battery Shop. The replacement pages have
been incorporated into Final Report which
can be found on 05/16/00.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.


SIGNATURE

DIRECTOR, ENVIRONMENTAL PROTECTION DEPARTMENT
BY DIRECTION OF THE COMMANDER
TITLE

3/13/00
DATE