



DEPARTMENT OF THE NAVY
CRANE DIVISION
NAVAL SURFACE WARFARE CENTER
300 HIGHWAY 361
CRANE, INDIANA 47522-5001

N00164.AR.000560
NSWC CRANE
5090.3a

IN REPLY REFER TO

5090
Ser 095/0133

28 JUN 2008

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 as enclosure (1), responses to the U.S. Environmental Protection Agency's approval conditions for the Indiana Bat food chain study. The permit required Certification Statement is provided as enclosure (2).

NAVSURFWARCENDIV Crane point of contact is Mr. Thomas J. Brent, Code 09510, telephone 812-854-6160.

Sincerely,

James M. Hunsicker
Director, Environmental
Protection Department
By direction of the Commander

Encl:

- (1) Conditional Approval Responses (3 Copies)
- (2) Certification Statement

Copy to:
ADMINISTRATIVE RECORD
SOUTHNAVFACENCOM (Code 1864)
USFWS (Lori Pruitt)
CEWES-EE-C
CEWESS ERD-A
IDEM (Doug Griffin)

Responses to the Conditional Approval of Bat/Insect Collection QAPP

Condition 1:

Include data obtained from U.S. FWS on explosives and inorganics levels in Tables 2 and 3 when such information becomes available. Create a new table comparing the anticipated detection limits for all analytes (inorganic and organic) to the proposed levels of concern.

Response 1:

As the start of the project was nearing at the time of this comment (and has now begun), Crane Division, Naval Surface Warfare Center (NSWC Crane) proposes that once data is received from the U.S. FWS, to include the information in the report brief that will be prepared at the end of the project. Since the information pending from the U.S. FWS will apparently not impact the way the collection and analyses are conducted, Tables 2 and 3 will be repeated in the final report package with the additional information from the U.S. FWS.

Condition 2:

Copies of the 8330 SOP no. M-8330-ECC-OP/A, Ver. 1.0 and the Phosphorous SOP should be provided that have been signed & dated by an approving official. (Did someone ever sign a copy of the 8330 SOP on Jan. 31, 1999?) Also, the laboratory name & facility address should appear on the cover pages of the SOPs.

Response 2:

The requested signature page for the Phosphorous SOP is provided as attachment (1). Please replace the current SOP signature page with the new one. A new SOP for Method 8330 is provided as attachment (2).

Condition 3:

Appendix 5 of the 8330 SOP mentioned above, dated Jan. 31, 1996, should be supplemented with retention time data for each of the degradation products to be reported in this project. (Because the degradation products will be analyzed using the same extract & analysis run as for the standard 14 compounds (minus tetryl), there could conceivably be coelution of degradation compounds w/standard compounds on the primary column.) And just to "confirm", it does appear that even though the degradation products will be confirmed using the photo diode array detector, the other standard analytes will be confirmed using a secondary confirmation column, as stated in the SOP.

Response 3:

The revision of Appendix 5 of the 8330 SOP is found in attachment (2). Also, the U.S. EPA is correct, the degradation products will be confirmed using the photo diode array, and the other standard analytes are confirmed with a confirmation column.

Condition 4:

The list of laboratory quality control qualifiers which will be used to qualify explosives data should be provided.

Response 4:

For explosives, WES uses "J" for estimated values between the MDL and LRL. WES also uses a "< LRL#" for undetected values.

Enclosure (1)

Replacement Standard Operating Procedure 365.3
Signature Page

for
Quality Assurance Project Plan
for
Insect Collection and Analysis
at the
Ammunition Burning Grounds
Crane Division, Naval Surface Warfare Center

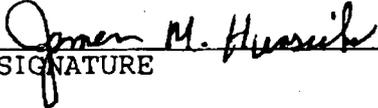
Revised Standard Operating Procedure 8330
for
Quality Assurance Project Plan
for
Insect Collection and Analysis
at the
Ammunition Burning Grounds
Crane Division, Naval Surface Warfare Center

5090
Ser 095/0133

28 JUN 2000

The letter Ser 095/0133 was for the
submittal of replacement pages for the
Final Insect Collection & Analysis QAPP
ABG. The replacement pages have been
incorporated into the previously submitted
QAPP on 03/06/00.

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

6/27/80
DATE