



DEPARTMENT OF THE NAVY

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

N00164.AR.000575
NSWC CRANE
5090.3a

IN REPLY REFER TO:

5090
Ser 095/0176
18 AUG 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 incorporation and approval the response to comments and replacement pages for the August 2000 Revised Draft Interim Measures (IM) Workplan for Mine Fill A Battery Site as enclosure (1). Enclosure (2) is the required certification statement.

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

Sincerely,

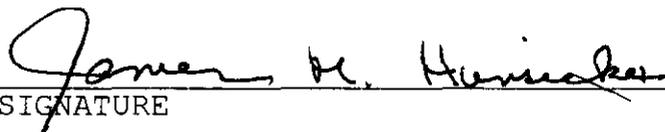
JAMES M. HUNSICKER
Director Environmental Protection
Department
By Direction
Of The Commander

Encl:

- (1) Revised Draft IM Workplan for Mine Fill A Battery Site
- (2) Certification Statement

Copy to: (w/o encls)
→ ADMINISTRATIVE RECORD
IDEM (D. Griffin)
SOUTHNAVFACENGCOM (Code 1864)
TOLTEST Crane

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

8/17/00
DATE

Comment Resolution on The Mine Fill A Battery Site Cleanup
Draft Work Plan, Quality Assurance Project Plan, And Sampling And Analysis Plan Dated
May 2000
Naval Surface Warfare Center
Crane, Indiana

Work Plan Comments

Comment 1:

List of Acronyms, page iii: The definition for NSWC should read Naval *Surface* Warfare Center.

Resolution 1:

The correction has been made.

Comment 2:

Section 2.0, page 7: Under the Site Supervisor section, seventh bullet, delete “(check the name of the form?)”

Resolution 2:

The correction has been made.

Comment 3:

Section 3.3.3, page 11: The first sentence should be clarified to state that analytical constituents detected above RBSLs at both areas will be referred to as constituents of concern.

Resolution 3:

This sentence has been changed to make this clarification.

Comment 4:

Section 3.4, page 12: Clarify if it is intended to excavate all soils determined to be above RBSLs. Also, identify steps taken to control runoff from contaminated soils and containers should precipitation events occur.

Resolution 4:

The clarification on what soils will be excavated has been made, and precipitation contingencies have been inserted.

Comment 5:

Section 3.8.2, page 14: Explain procedures for disposing of these decontamination fluids. See also SSHP comment 6.

Resolution 5:

A decontamination fluids handling procedure has been added.

Site Safety and Health Plan Comments

Comment 6:

Section 5.2, page A-10: Explain procedures for disposal of decontamination fluids.

Resolution 6:

Disposal of decontamination fluids has been referenced.

Sampling and Analysis Plan Comments

Comment 7:

Section 2.5, page B-6: Clarify if background samples will be analyzed for the full suite of Appendix IX constituents or only for COCs identified through pre-excavation sampling.

Resolution 7:

The clarification has been made.

Comment 8:

Section 3.1, page B-7: In the fifth sentence of the second paragraph, note that VOC samples are not to be mixed in the stainless steel bowl.

Resolution 8:

See Resolution 9.

Comment 9:

The Sampling and Analysis Plan should be fortified with step-by-step details concerning how each of the various sampling activities will be performed. This information would be best suited for a Standard Operating Procedure style of presentation. For instance, although the use of SW-846 method 5035 is mentioned, there is apparently no field procedure incorporated into this QAPP explaining how the field activity will be performed in the field.

Resolution 9:

A Standard Operating Procedure for soil sampling has been added as Attachment E which includes the procedures for obtaining samples requiring VOC analysis.

Comment 10:

Section 1.5, page B-1: The DQO section suffers from a lack of decision level comparisons to analytical method reporting limits. Although there is brief discussion of data comparison, the use of this QAPP as a planning tool is undermined by absence of a table comparing the decision levels, forming the basis of project objectives, to Quanterra's proposed method reporting limits. Clearly defined project objectives and decision rules should be included here.

Resolution 10:

A paragraph has been added to this section which states that the laboratory's reporting limits will be compared to SSL cleanup goals or the PQLs published in the Appendix IX list. Failure to meet these project reporting limits is also discussed.

Quality Assurance Project Plan Comments

Comment 11:

How will this study address the potential for groundwater contamination from the battery and soil areas? Explanation should be included appropriate sections of the QAPP and Workplan.

Resolution 11:

The QAPP and Work Plan (Section 1) now reflect that this is an interim measure which addresses only source contamination removal and not groundwater contamination.

Comment 12:

Section 5.0, page C-10: If Quanterra is now known as Severn Trent Labs, change names through the entire document.

Resolution 12:

The references in the documents now use Quanterra exclusively since their QAMP and SOPs all use the name Quanterra, not Severn Trent.

Comment 13:

Section 12.1, page C-25: Referring to field instrumentation, if there will be VOC monitoring equipment used during excavation, it should be noted here. There are also two sections identified as 12.1 on this page (as well as in the Table of Contents) with a typo referring to Quanterra.

Resolution 13:

No VOC monitoring equipment is scheduled for use on this project. The error referring to two section 12.1 has been corrected.

Comment 14:

Appendix C Title Page: The word "quality" is misspelled on this page.

Resolution 14:

The correction has been made.

Comment 15:

The QAPP has no title page for approving officials.

Resolution 15:

A title page has been added.

Comment 16:

Section 3.1, page C-3: refers to a section 2.0 of the SAP, when really this should refer to section 2.0 of the Workplan instead.

Resolution 16:

The correction has been made.

Comment 17:

Section 3.2, page C-3: This section should mention which of the laboratory personnel take responsibility for performing internal data validation and who performs internal QA audits.

Resolution 17:

The text now states that the Laboratory QA Officer performs these functions.

Comment 18:

Section 4.5, page C-8:, “completeness”, should be specified as > 90% for each area.

Resolution 18:

The change has been made.

Comment 19:

Section 4.6, page C-8: VOCs trip blanks are intended for aqueous samples (e.g. groundwater). While they will not be relevant to soil samples, they may be of utility for QC purposes if aqueous equipment rinse blanks are collected. This section of the QAPP should reflect this understanding. Also, field temperature blanks should be included as part of the QC program for this project.

Resolution 19:

The text has been changed to reflect the understanding concerning trip blanks and VOC analysis. A discussion about temperature blanks has also been added.

Comment 20:

Section 4.6, page C-8: The third paragraph contains some confusing statements. For instance, it is stated that MS/MSD samples are designated/collected for VOCs analyses only, when they should also be collected for the Appendix IX analyses as well. While the purpose of collecting an MS sample is briefly explained, it isn't explained why the MSD sample is needed. Is it intended to only collect MSD samples for organic analyses, and use sample replicates or field duplicate data from the MS samples for metals analyses?

Resolution 20:

The reference to collecting MS/MSD samples for VOC analysis has been eliminated. As shown in the revised Table 1, MS/MSD samples will not be restricted to VOC analysis. An explanation of MSD samples is also included.

Comment 21:

Section 4.6, page C-9: Table 1.0 remains confusing. It would clarify matters if the Table could be revised such that the number of samples to be collected is presented in terms of each parameter group, per area. The way this reads, it could be (mis?)interpreted that 11 samples will be taken for analysis of total metals, and that 11 samples of TCLP metals will be collected, and also 11 samples will be taken to measure reactivity, then 11 samples will be taken for analysis of Appendix IX, etc. Specificity will clarify the meaning of the pre-excavation sampling table.

Resolution 21:

The table has been updated to reflect the number of samples obtained for each sample area and the specific analytical requirements.

Comment 22:

Section 5.0, page C-10: There is a bit of discussion concerning the soil area, and a table plus discussion devoted to summarizing the analysis to be performed for the Battery Area. However, there should be balance in presentation. A table indicating which test methods will be used to report the soil area test parameters should appear in the QAPP as well. (This tabulated information should appear in section 8.0 - Analytical Procedures.) Also, there are some parameters listed on p. C-10 (i.e. sulfide, cyanide) that do not appear in Table 1.0. Somewhere it should be indicated whether the "TCLP metals" group will be reported as metals determined in a leached TC extract.

Resolution 22:

The discussion of analytical procedures has been moved to Section 8.0. A table (Table 4.0) has been added listing the analytical parameters applying to the Soil Area. The missing parameters have been added to Table 1.0, and a clarification has been added concerning TCLP metals analysis.

Comment 23:

Section 7.0, page C-13: contains some elaboration on laboratory calibration for metals analyses, but remains silent on the other methods which will be performed. As opposed to summarizing these procedures, the QAPP writer is instead encouraged to itemize the specific sections from each of the relevant proposed SOPs addressing calibration so that the sections can be readily found & checked. Tabular presentation is preferred.

Resolution 23:

The discussion on calibration for metals analysis has been removed and a table (Table 2.0) has been inserted to guide the reader to specific pages within the SOPs where calibration procedures can be found.

Comment 24:

Section 10.1.1, page C-18: What project objective might the field GC be used to satisfy? What decision criteria will be applied to its use? Unless this instrument will definitely be used, it is recommended to delete this reference to its speculative use.

Resolution 24:

The reference to the potential use of a field GC has been removed.

Comment 25:

Section 10.2.2, page C-18: requires further clarification. First, the CLP National Functional guidelines are not directly to RCRA SW-846 methods, and in some cases even will not be addressed to any degree (i.e. explosives testing methods). Also, the QAPP writer is referred to the Region 5 QA Policy document (April 1998), for definite distinctions between the meanings of laboratory data validation and data assessment. (I think the terms may have been used interchangeably here.) Does Quanterra know they are supposed to perform a method detection limit study in support of this project? Will they really need to? Furthermore, it is not explained who will be performing independent data validation. (This person should also be identified in section 2 of the QAPP.) Also, who will perform the data review mentioned near the bottom of the page.

Resolution 25:

This section has been revised to clarify validation (not assessment) procedures and who performs these procedures. The reference to the method detection limit study has been removed.

Comment 26:

Section 10.2.2., page C-20: The definitions for the “B” and “J” qualifiers seem identical, which should be explained or corrected. Also, for the “E” phrase, “... greater than calibration curve...” contains a typo, and the phrase itself should be clarified to mean beyond the upper range of the calibration curve, instead.

Resolution 26:

The required clarifications have been made.

Comment 27:

Section 10.3.2, page C-22: Insert “surrogates” into the last bullet, and include chromatograms, specifically, in the 3rd bullet from end.

Resolution 27:

These items have been inserted into the text.

Comment 28:

Section 13, page C-26: This section of the QAPP is silent on the subject of Data Assessment. The QAPP writer is referred to the Region 5 1998 QA Policy, (and also page C-19 of the QAPP & comment 25 above).

Resolution 28:

The reference to assessment has been removed (now discussed in Section 3.3).

Comment 29:

Section 14.3, page C-30: The "Project Manager" is mentioned twice. Is this person the "Toltest Project Manager" as mentioned in section 2 of the Workplan? When, or under what circumstances would U.S. EPA be notified of any need for corrective action?

Resolution 29:

The reference to the Project Manager has been clarified, and a statement for notification of the EPA has been added.

**MINE FILL A BATTERY SITE CLEANUP AT THE NAVAL SURFACE WARFARE
CENTER CRANE, IN
REPLACEMENT PAGES**

The following pages are provided as replacement pages for the Work Plan, Site Safety and Health Plan, Sampling and Analysis Plan, and the Quality Assurance Project Plan.

Work Plan:

- Title page
- Pages iii, 1&2, 7&8, 11&12, and 13&14

Site Safety and Health Plan:

- Title page
- Page A-9&10

Sampling and Analysis Plan:

- The entire plan
- Attachment E tab and title page (a new insert, not a replacement)
- SOP 1.0 (a new insert, not a replacement)

Quality Assurance Project Plan

- The entire plan
- New attachment tabs
- Supplemental SOP Binder

5090
Ser 095/0176

18 AUG 2000

The letter Ser 095/0176 was for the
submittal of Revised Draft Interim Measures
Workplan for Mine Fill A Battery Dump Site.
The Revised Draft submitted 02/02/01
replaced this workplan.