



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DW-8J

September 20, 2000

Mr. Tom Brent
Naval Surface Warfare Center
EPD, Code 095 B-3260
300 Highway 361
Crane, IN 47522

Re: DR Navy RFI QAPP

Dear Mr. Brent:

This letter is to inform you that the Navy may disregard all sections in the Draft Solid Waste Management Unit (SWMU) 6 & 7 Phase III Soils RCRA Facility Investigation (RFI) Quality Assurance Project Plan (QAPP) dated February 2000 that relate to the ground water sampling at SWMU #6. The purpose of its inclusion in the RFI was to investigate the presence of a potential manganese "hot spot" in the soils of the Demolition Range (DR) Navy.

The Demolition Range (SWMU #6) is a regulated open detonation unit under the RCRA Subpart X permit issued in November 1999. This unit has been subdivided into the DR Army and the DR Navy. It has also been designated as SWMU #6 and has been undergoing corrective action investigations.

As part of the work involved in permitting the unit, the DR underwent a risk assessment along with the other open burning/open detonation units at NSWC (i.e., Ammunition Burning Grounds and Old Rifle Range). The risk assessment identified risks from two aquifers at the DR. The constituents of concern were identified as: Aluminum, Arsenic, Beryllium, Manganese, Nickel, and RDX. No risks were identified in the DR soils.

A conference call was held on June 27, 2000 between the Navy, Tetra Tech NUS, Inc., the Indiana Department of Environmental Management, and the USEPA to discuss the draft RFI QAPP developed for SWMUs 6 & 7. A question arose as to the practical benefits of the manganese "hot spot" study at the DR Navy at this time because soils were not identified as a risk driver in the risk assessment. Soils contamination at the DR Navy can be addressed via the RCRA Subpart X permit at unit closure. The DR unit is a permitted open detonation unit with an estimated closure date of 2015.

Because the risk assessment identified groundwater as the sole risk pathway at the DR, groundwater is being monitored under the Subpart X permit and groundwater use has been restricted. The groundwater use restriction eliminates the risk pathway of groundwater ingestion. The Navy is required to perform semi-annual RCRA Subpart F groundwater detection monitoring at the DR under the permit. The groundwater wells used in the risk assessment study done at the DR are being monitored under the Subpart X permit. Although wells having elevated manganese levels specific to the DR Navy that were identified through previous RFI work are not part of the DR point-of-compliance well network, the DR Navy is located within the point-of-compliance. Previous RFI investigations indicate that groundwater seeping from the DR Navy would be collected by the NPDES permitted sedimentation ponds around the perimeter of the DR or, because the aquifer underlying the DR Navy is discontinuous, migrate downward through fractures in the bedrock to be intercepted by the point-of-compliance wells.

It is the recommendation of this office that the proposed manganese "hot spot" study may be deferred until closure of the DR, if required at that time. The Navy should remove all reference to the groundwater sampling at SWMU #6 and may proceed with revision of the RFI QAPP to address the Old Rifle Range (SWMU #7). The Navy will need to add Aluminum to the groundwater monitoring program currently in place at the DR. By way of this letter, it is understood that all sections of the RFI QAPP pertaining to the DR will be disregarded and remediation at the DR will be addressed under unit closure or if groundwater monitoring detects contaminant migration requiring corrective action under the Subpart X permit.

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

Sincerely,



Peter Ramanauskas
Environmental Engineer
Waste Management Branch
Corrective Action Section

cc: Bill Gates, SOUTH DIV
Doug Griffin, IDEM
Hak Cho, USEPA