



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

SEP 20 2000

REPLY TO THE ATTENTION OF:

DW-8J

Mr. Tom Brent  
Naval Surface Warfare Center  
EPD, Code 095 B-3260  
300 Highway 361  
Crane, IN 47522-5001

Re: Comments on Mine Fill A Battery  
Site WP/SAP/QAPP Revisions  
Dated August 2000

Dear Mr. Brent:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the Draft Work Plan, Quality Assurance Project Plan (QAPP), and Sampling and Analysis Plan (SAP) revisions for the Mine Fill A Battery Site Cleanup dated August 2000.

Attached you will find U.S. EPA's remaining comments. Please revise appropriate sections of the Work Plan, QAPP, and SAP to address these comments.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Ramanauskas".

Peter Ramanauskas  
Environmental Engineer  
Waste Management Branch  
Corrective Action Section

Enclosure

FAUSER\PRAMANAU\Crane\MFA\MFA Battery\MFA Battery August Revision Comments.wpd

cc: Core Team Members: Bill Gates, SOUTHDIV (w/ encl)  
Doug Griffin, IDEM (w/ encl)

Project Team Members: Allen Debus, USEPA (w/ encl)

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**Remaining Comments on the Mine Fill A Battery Site Draft Work Plan  
Quality Assurance Project Plan, and Sampling And Analysis Plan  
Revisions Dated August 2000  
Naval Surface Warfare Center  
Crane, Indiana**

*Comment 1:*

Referring to the revised Section 3.4, page 12, fourth paragraph, provide further information on what steps would be taken to control runoff from the excavation areas, containers, and, if needed, the 6-mil plastic sheeting between excavation and the containers in the event of precipitation to ensure that uncontaminated areas remain clean. Also, please estimate a "worst-case" scenario on volume of excavated soil at the battery area and how this would affect time required for excavation. Would you still be able to excavate the maximum soil volume in one day?

*Comment 2:*

Referring to the revised Section 3.8.2., provide further information on what tests will be utilized to characterize decontamination fluids. Would the IDW be disposed of on-site or off-site and what decision criteria would be used?

*Comment 3:*

Tables 2.0 and 4.0 of the QAPP should reference methods "8260/5035" because the laboratory must be equipped to conservatively measure VOCs in the EnCore samples. Quanterra should not analyze soil VOCs using the 8260/5030 method combination.

*Comment 4:*

Referring to the revised SAP Section 1.5, page B-2, which SSLs are being referred to? Please note that PQLs are not target levels based on risk. The QAPP writers should prepare a table comparing all target action levels to anticipated laboratory reporting limits. This table should be included in the QAPP.

*Comment 5:*

Note that the methods mentioned in QAPP Table 2.0 do not match those stated in Tables 3.0 and 4.0. Such inconsistencies should be resolved throughout the Workplan and QAPP.

*Comment 6:*

Referring to revised QAPP Section 10.2.2., note that explosives are not included in the CLP SOW. How will non-SOW data such as this be appropriately flagged/qualified? If the instructions are not in the SOW, then they should be included in the QAPP.