



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

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NSWC CRANE
5090.3a

REPLY TO THE ATTENTION OF:

October 31, 2000

DW-8J

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

Re: U.S. EPA Conditional Approval of
Work Plan for Risk Assessment at
SWMUs 4, 5, 9, & 10.

Dear Mr. Brent:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the revisions to the for the Draft Work Plan for Risk Assessment at SWMUs 4, 5, 9, & 10 submitted September 1, 2000 and October 3, 2000.

The U.S. EPA hereby conditionally approves the Work Plan for Risk Assessment at Solid Waste Management Units 4, 5, 9, & 10. This conditional approval is being granted so that you may begin fieldwork activities before adverse field conditions develop this winter. The conditions are included as Attachment 1 to this letter and should be addressed as soon as possible. Please note that in addition to the enclosed conditions, there may be additional comments on the ecological risk portions of the Work Plan forthcoming which I will promptly forward to you. Attachment 2 is the QAPP signature page. Please return this page to U.S. EPA when all signatures have been collected.

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
WMB, Corrective Action Section

Enclosures: 2

F:\USER\PRAMANAU\Crane\RA SWMUs 45910\RA SWMU45910 Approval.wpd

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

Project Team Members: Allen Debus, U.S. EPA (w/ encl)
Mario Mangino, U.S. EPA (w/ encl)
Dan Mazur, U.S. EPA (w/ encl)

Attachment 1

Condition 1:

Referring to the Navy's response to the second e-mail comment dated September 14, 2000, we would prefer that the Navy follow the low-level procedure of method 5035 for analysis by 8015 as described in the last paragraph of the response versus the high level technique because the toxicity of acetonitrile is high and the PRG values would be correspondingly low.

Condition 2:

In Section 10.1.2., page 10-5, of the work plan, please note that the second condition of the first sentence of the second paragraph should apply only to those chemicals for which comparison to background has been deemed appropriate.

Condition 3:

In Section 10.1.2.1., page 10-6, please note that the risk-based U.S. EPA Region IX screening concentrations are based on a hazard quotient of 1.0 for individual chemicals. Please clarify if this sentence is meant to reflect that the risk-based screening levels will be based on a hazard quotient of 0.1 to ensure that additive risks for all chemicals will not exceed 1.0 as noted in the footnote to Figure 4-1.

Condition 4:

As stated in Section 10.1.2.1., the site soil data will be compared to the U.S. EPA generic SSLs for transfers of soil to air to identify whether a quantitative analysis of this exposure pathway is needed. Based on this language, the U.S. EPA is expecting that each contaminant having a maximum soil concentration exceeding the corresponding soil-to-air SSL will be moved forward in the baseline risk assessment. This procedure will be used to determine which contaminants will be addressed in the quantitative evaluation of the inhalation exposure pathway. On the other hand, if the comparison data provide convincing evidence that no site contaminants are present at concentrations exceeding the corresponding SSLs, then the inhalation pathway will be eliminated from further evaluation. The HHRA report will provide a full explanation of all decisions made by employing the COPC screening levels.

Condition 5:

Referring to Section 10.2.4., page 10-13, second paragraph, non-carcinogenic intake estimation should be changed to "average *daily* exposure" and carcinogenic intake estimation to "lifetime *average daily* exposure".

Condition 6:

Section 10.2.4.3. states that RME and CTE values of 1.0 and 0.5, respectively, will be used for the "FI" parameter (fraction of soil ingested from the source). However, the RAGS document and the 1993 EPA memo on standard default exposure factors for the RME and CTE state that the FI is a value for which reliable site-specific information would be needed on the behavior of the receptor population and the possibility that the same receptor could contact both contaminated and non-contaminated media. In the absence of such information, we believe that the conservative default value of 1.0 should be used for both the RME and CTE cases.

Condition 7:

Referring to Table 10-3, on page 10-14, the "IR_s" value for CTE should be 100 as the rationale assumes similarity to adult exposure. Also, the RME and CTE "SA" values for Maintenance/Occupational Worker and Adult Recreational User noted in the Table and in the bulleted text on pages 10-19 & 10-20 should include skin surface area of the head or face.

Attachment 2

COPY

QUALITY ASSURANCE PROJECT PLAN
FOR
RISK ASSESSMENT
AT
SWMUs 4, 5, 9, AND 10

NAVAL SURFACE WARFARE CENTER, CRANE DIVISION
CRANE, INDIANA

REVISION 1
AUGUST 2000

COMPREHENSIVE LONG-TERM
ENVIRONMENTAL ACTION NAVY (CLEAN) CONTRACT

Submitted to:
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
North Charleston, South Carolina 29406

Submitted by:
Tetra Tech NUS, Inc.
661 Andersen Drive
Foster Plaza 7
Pittsburgh, Pennsylvania 15220

CONTRACT NUMBER N62467-94-D-0888
CONTRACT TASK ORDER 0010

Karen M. Smecker Date 8/28/00
KAREN M. SNECKER
TASK ORDER MANAGER
TETRA TECH NUS, INC.

Debbie Wroblewski Date 8/28/00
DEBBIE WROBLEWSKI
PROGRAM MANAGER
TETRA TECH NUS, INC.

Paul V. Frank Date 8/28/00
PAUL V. FRANK
QUALITY ASSURANCE MANAGER
TETRA TECH NUS, INC.

Allen Debus Date 10-27-00
ALLEN DEBUS
QUALITY ASSURANCE COORDINATOR
U.S. EPA REGION 5

Peter Ramanauskas Date 10/31/00
PETER RAMANAUSKAS
PERMITTING PROJECT MANAGER
U.S. EPA REGION 5

Thomas Brent Date 11/16/00
TOM BRENT
SITE MANAGER
NSWC CRANE

Date _____
KATHY KREPS
LABORATORY DIRECTOR
LAUCKS TESTING LABORATORIES, INC.

Date _____
BELEN RUEDA
LABORATORY MANAGER
TRIANGLE LABORATORIES, INC.