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NSWC CRANE
5090.3a

**DEPARTMENT OF THE NAVY**
CRANE DIVISION
NAVAL SURFACE WARFARE CENTER
300 HIGHWAY 361
CRANE, INDIANA 47522-5000

IN REPLY REFER TO:

5090
Ser 095/0280
18 DEC 2009

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 November 21, 2000 comments and subsequent 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,

Thomas J. Brent
for JAMES M. HUNSICKER
Director Environmental Protection Department
By Direction
Of The Commander

Encl:
(1) Response to Comments & Replacement Pages
(2) Certification Statement

Copy to:
Administrative Record
IDEM (D. Griffin)
SOUTHNAVFACENGCOM (Code 1864)
TOLTEST Crane (w/o encls)

**Response to Comments on the Mine Fill A Battery Site QAPP**
**NSWC CRANE, Indiana**
**For Comments Received from EPA Dated 11/21/00**

Comment 1:

Referring to comment 4, I note that in Appendix D (for the Battery QAPP only), many residential Region 9 PRGs are flagged as "NA". I am uncertain why there are both industrial and residential level risk columns in this table. Which of these columns will be considered relevant to the investigation? Given that more human health risk data appears in the industrial column than in the residential column, the project's unclear objectives seem weighted to industrial type goals. I do concur with your notes on the cover of Appendix D that Crane should set up a set of decision rules in the form of a "decision tree" for both the MFA and Better Site. Also, in this table, there are at least two compounds (e.g. hexachlorophene) for which the reporting limit entry simply reads "don't do". Why do such compounds appear in the table then? Several EDQLs and several residential risk goals won't be met with the proposed methods. Some further attention should be given to data needs and associated decisions to be made based on environmental chemical data.

Response 1:

Appendix D has been revised. Many of the "NA" entries, which are now identified as "not applicable to this constituent or not available", have been filled in with values from the NSWC Crane Biofacility QAPP, which references the *USEPA Region 5 Site-Specific Risk Assessment Memorandum for NSWC Crane* (this document is not available to TolTest). The table includes the various cleanup goals (i.e. Ingestion, Residential, Industrial, and Ecological) so that the ECOTR can determine the appropriate cleanup goal given the results of pre-excavation sampling. Section 8 of the QAPP now includes this "decision tree" language. The two compounds previously identified as "don't do" are now identified as "contract laboratory can not perform this analysis." These two compounds were left in the table so that the complete constituent list was available to the reader. According to Peter Ramanauskas the "Detection limit issues can be ironed out later on, but you should understand up front (through the devised decision tree) what the impact of these detection limits will be for the post-excavation sampling events. (i.e. that the present detection limits may not suffice for certain post-excavation project decisions that must be made)." Resolution of these issues, if they occur, will be determined by the ECOTR with input from the EPA and assistance from TolTest.

**Response to Comments on the Mine Fill A Battery Site QAPP**
**NSWC CRANE, Indiana**
**For Comments Received from EPA Dated 11/21/00**

Comment 2:

The response to comment 5 is acceptable, but Table 2.0 should conform with tables 3.0 and 4.0 (i.e. see cyanide and sulfide methods).

Comment 3:

Referring to comment 5, data qualifier "flags" should be added for evaluating explosives data QC.

**TolTest NOTE**: this apparently refers to comment 6, not comment 5.

Comment 4:

Referring to comment 7, I don't see where proposed changes were made.

Response 2, 3, & 4:

These issues were addressed in the previous response to comments (possibly the previous replacement pages were not inserted). Regardless, the current responses have required that new pages be printed for Sections 8 through 14 (pages 15 through 32).

5090
Ser 095/0280

19 DEC 2000

The letter Ser 095/0280 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.

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.

Thomas J. Grant, acting
SIGNATURE

DIRECTOR, ENVIRONMENTAL PROTECTION DEPARTMENT
BY DIRECTION OF THE COMMANDER
TITLE

19 DEC 2000
DATE

Enclosure (2)