



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

N00164.AR.000754  
NSWC CRANE  
5090.3a

REPLY TO THE ATTENTION OF:

August 8, 2002

DW-8J

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

Re: Comments on SWMU#17 RFI Report

Dear Mr. Brent:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the PCB Capacitor Burial/Pole Yard RCRA Facility Investigation Report for Solid Waste Management Unit #17 dated June 2002.

Attached please find U.S. EPA's comments on this report. Please note that the Indiana Department of Environmental Management TSCA program may have additional comments on this report.

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

Sincerely,

Peter Ramanauskas  
Environmental Engineer  
WMB, Corrective Action Section

Enclosure

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cc: Bill Gates, SOUTHDIV (w/ encl)  
Doug Griffin, IDEM (w/ encl)  
Tony Martig, USEPA (w/ encl)

**COMMENTS ON THE RFI REPORT FOR  
SWMU 17 - PCB CAPACITOR BURIAL/POLE YARD - DATED JUNE 2002  
NAVAL SURFACE WARFARE CENTER  
CRANE, INDIANA**

*Comment 1:*

“Solid” is misspelled in the Acronym List section for SWMU.

*Comment 2:*

Section 2.11, page 2-9, states that samples of decontamination fluid were analyzed and found to contain PCBs at unacceptable levels for disposal in the NSWC-permitted sanitary sewer system. Please amend this section to state how the fluids were disposed.

*Comment 3:*

If there was any handling or storage of PCB electrical equipment inside building 3072 or 357, some description should be included of the considerations made to determine why the buildings were not sampled. This may be based on background information, visual inspections, previous samples, etc.

*Comment 4:*

It seems like there should be more investigation of sediment in NW drainage way unless an investigation will be pursued upon analysis of verification samples after the removal of the contaminated sediment.

*Comment 5:*

The TSCA program has generally required removal of contaminated material to the next clean sampling point. The proposed excavation areas as depicted in Figure 3-4 do not seem to be to the next clean sampling points and instead to almost a midpoint between a sample of contaminated material and a sample of clean material. The excavation can still be to the bounded areas as depicted in Figure 3-4, but verification sampling should be conducted to confirm that all the contaminated material was removed. This may be further explained in the Interim Measure removal work plan. See Comment 6 on required verification sampling.

*Comment 6:*

After removal of the contaminated soil, additional sampling to verify that the removal met the cleanup objectives is required (see 40 CFR 761.61(a)(6)). A description of the verification sampling plan should be included in the Interim Measure removal work plan.

*Comment 7:*

Section 1.3.1, 1<sup>st</sup> sentence: there is no section 1.2.4.

*Comment 8:*

Figure 3-1: the surface sample identifications should be 17SSxx, instead of 17SBxx.

*Comment 9:*

Table 3-4: Location of Maximum Concentration for March 2002 sample should be 17SB38.