



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
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CHICAGO, IL 60604-3590

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November 25, 2002

REPLY TO THE ATTENTION OF

DW-8J

Ms. Christine Freeman
Naval Surface Warfare Center
EPD, Code 095 B-3260
300 Highway 361
Crane, IN 47522-5001

Re: U.S. EPA Comments on Revised
Grit Blast Site Closure Plan
August 2002

Dear Ms. Freeman:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the revised Closure Plan for the Grit Blast Site Building 3220 dated August 2002. Comments on this plan are attached to this letter. Please revise the plan to address these comments.

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

Regards,

Peter Ramanauskas
Environmental Engineer
Corrective Action Section

Enclosures: 1

cc: Bill Gates, SOUTH DIV (w/ encls)
Doug Griffin, IDEM (w/ encls)
Allen Debus, U.S. EPA (w/ encls)

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U.S. EPA COMMENTS
Revised Closure Plan for the Grit Blast Site - Building 3220
Naval Surface Warfare Center
Crane, Indiana

Closure Plan:

Comment 1:

Page 6, Section 3.0: Chromium is mentioned here. Presumably this is 'total chromium,' but would there be any need to report hexavalent chromium too? In this event the analytical and sampling strategy would be altered.

Comment 2:

Page 12: It should be stated what factors/data results (specifically) will trigger the decision to conduct groundwater sampling & for which parameter.

Comment 3:

Page 18, Section 8.0: Please modify the first paragraph to state that closure will be completed in accordance with the approved closure plan and soil remediation plan. Referring to Table 4 - footnote asterisk: A CLP-like data Level IV data package should also be prepared as a supplement to the closure documentation report.

Comment 4:

Page 19, Section 9.0: The title of this section should also refer to Soils as they are described in the ensuing bullets.

Comment 5:

Page 19, Figure 7: The logic of the decision tree is a bit confusing. (Look at the array of arrows associated with two boxes under the left hand column of boxes.) Please update the green box to say "Complete Sampling Report and/or Soil Remediation Plan." In the second column of boxes, and elsewhere where references to screening levels are stated, a reference should be made to Table 5 (if that is the case). TCLP levels stated in Table 3 should not be regarded as human health screening values.

Comment 6:

Page 19, first sub-bullet: Note that there is an unintended, apparent (semantic) inconsistency here where it states that 14 discreet SS samples will be collected from area of visible contamination, followed by a

reference to the 10 borings within the area of visible contamination. Please clarify the first sentence to be consistent with the meaning of the rest of this paragraph. Also, the bullets on page 19 seem to be inconsistent with the Figure 7 decision tree. The bullets seem to indicate that subsurface soils will be taken in the first round of sampling while the decision tree seems to show subsurface sampling as optional depending on surface sampling results. See also page 22 last paragraph (text) and Closure Plan Comment 5 (tree).

Comment 7:

Page 20, 1st bullet (1st sub-bullet): Please clarify what the 'accepted concentration levels' are, or provide a specific reference to where they are stated.

Comment 8:

Table 5: Rationale should be provided as to whether hexavalent chromium is a relevant target parameter for this project. This table should be referred throughout the document where the text mentions closure levels.

Comment 9:

Page 22, Section 11.1.1: In the final paragraph, the twice-used term 'contamination' should be clarified. By 'contaminated', is it intended that Table 5 closure levels have been exceeded?

Comment 10:

Page 23, Section 11.2.2: The overlying gravel should be washed & verified clean prior to disposal or recycling. Washing appears to be planned as Table 5 contains rinsate levels and should be explained in the text. Gravel washing was discussed during a December 13, 2001 phone call between the Navy and U.S. EPA.

Comment 11:

Page 24, Table 6: Is hexavalent chromium an issue?

Comment 12:

Page 25, 2nd bullet: There should be a reference to sample tags here.

Comment 13:

Page 29, Section 11.2.3: This section is somewhat confusing. Could the second sentence which pertains to QC samples, be clarified?

Comment 14:

Page 29, Section 11.2.4: It should be explained how or under what circumstances soil sampling data would trigger decision to conduct groundwater sampling.

Comment 15:

Page 30, Section 11.3: Tables 5 and 6 mention equipment blanks and wash water rinsates. The plan would benefit from additional clarification here so that terms used to refer to 'blanks' are not inadvertently thought to be interchangeable.

Comment 16:

Page 30, Section 11.4, Analytical Requirements: because GC and GC/MS methodologies haven't been proposed for this project, all references to such instrumentation should be deleted.

Comment 17:

Page 32, Section 12.0: Please correct the text stating "thirty (90) days". Also, the text "significant levels" should be changed to refer to levels exceeding the closure levels found in Table 5.

Comment 18:

Page 33, Section 12.1: Will filtering of rinsate samples be consistent with IDEM's RISC guidelines?

Comment 19:

Page 33, Section 12.2: How would bioremediation or SVE be amenable to lead and chromium contamination?

QAPP:

Comment 1:

Pages 4 of 33 and 14 of 33: Clarify why lead and chromium (and not hexavalent chromium) are the only COCs. For consistency, change "Project Action Limits" to "Closure Levels".

Comment 2:

Page 18 of 33: The deliverable due dates seem inconsistent with the dates in the 2nd and 3rd columns of this table.

Comment 3:

Page 19 of 33, 3rd paragraph, 3rd sentence: Closure Plan - comment # 9, also applies to the discussion of 'contamination.' See discussion in the 4th paragraph which clarifies criteria for removal. The 3rd paragraph should sound as clear as the 4th. For consistency, change "Project Action Limits" to "Closure Levels".

Comment 4:

Page 19 of 33, 4th paragraph: Here there is a discussion of the use of a grid system. How this grid will be designed should be clarified. Also, how the results of analytical testing apply to sampled grid spacings, bearing on the issue of whether 'contamination' is identified, should be clarified for all soil boring intervals. It seems as if the sampling locations have been judgmentally selected (see Figure 3), but that this was done before grid spacings were known.

Comment 5:

Page 20 of 33, last paragraph bullets: There is no rationale explaining why hexavalent chromium wouldn't also be a relevant target parameter.

Comment 6:

Page 21 of 33: The 2nd box is in need of clarification, as there is very little discussion of how the grid spacings were developed, or based on which equations, or how sampled grids pertain to relevant decision rules for closure. This tree should be consistent with what is presented in Figure 7 of the Closure Plan.

Comment 7:

Pages 27 and 28 of 33: There is an apparent redundancy for MS/MSD (or matrix duplicates) both in field and lab QC tables.

Comment 8:

Page 33 of 33, 2nd paragraph: Two very important decision rules casually slipped in here at the very end which should be 'fleshed-out' to further, appropriate degree in a 'project objectives' focused section of the Closure Plan or QAPP.

Comment 9:

It should be described (specifically) where and how all QC field sample types will be collected, and whether or to what extent these will be homogenized.

Comment 10:

The results of the most recent PE audit sampling conducted by the proposed laboratory (i.e. SWOK) for soil and water matrices (for target parameters of concern) should be submitted with the QAPP revision.