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Sent: Wednesday, November 27, 2002 9:59
To: Brent Thomas J CNIN; gateswh@efdsouth.navfac.navy.mil
Cc: Debus.Allen@epamail.epa.gov; dgriffin@dem.state.in.us
Subject: SWMU 12, 13, 16, 19 Additional Comments

Gentlemen,

Attached is an electronic copy of the additional EPA comments on the SWMU 12, 13, 16, 19 QAPP.

Please let me know if you have any questions.

Thanks & Happy Thanksgiving!

Pete

(See attached file: Additional comments SWMU 12131619 QAPP.wpd)



Additional
Comments SWMU 1213

Remaining EPA Comments on SWMU 12, 13, 16, 19 QAPP - July 2002
November 26, 2002

Response to Comment 6: The response is acceptable. However, is it possible to sample the material in the UAP drainage piping? I seem to recall that there was a drain in the center of the pad.

Response to Comment 8: In referring to Building 173, the response states that there are no records of historical spills in the area. Did the Navy along with Tetra Tech visually inspect these areas prior to developing the QAPP?

Response to Comment 10: The text on pages 1-38 and 1-39 remains confusing with respect to VOC analysis at MFB. The paragraph before the bottom bullet on page 1-38 mentions VOCs as having potentially be released at MFB and VOCs are noted for analysis near the therminol boilers in Table 1-3; however, VOCs are not mentioned in the analytical scheme bullets on pages 1-38 and 1-39. Please provide clarification to the text on VOC sampling and why this analysis will be only done near the therminol boilers. Mention of the VOC sampling results done under Interim Measures for MFB would be useful.

Response to Comment 12: Please state rationale for not performing hexavalent chromium analysis in this project.

Response to Comment 15: Does this mean that if soil sampling results near the therminol boilers exceed RBTLs for SVOCs and the sediment results for SVOCs do not exceed RBTLs, the soils will not be further investigated for SVOCs?

Response to Comment 16: The rationale stated for PCB sediment sampling at SWMU 16 seems to be opposite of the rationale stated for SVOC sampling at SWMU 13 noted in Response to Comment 15. If there was a PCB release to surface soils, particulates with PCB adhering to them would most probably have been transported to stormwater runoff channels. Same with dioxins/furans.

Response to Comment 18: Please clarify how data points detected below TV will be qualified.

Response to Comment 23: This response is acceptable. Are there similar areas at MFB which require similar investigation?

Response to Comment 27: Laboratory analysis of nitrate is noted in Tables 1-3 (SW-846 9056) and 1-7. Field test kits may be used for screening prior to lab analysis provided the detection limit is below RBTLs.

Additional Comments:

Comment 1:

Referring to MFA - revise the document to include additional investigation of the MFA Battery area.

Comment 2:

When determining sample locations for firing ranges at SWMU #19, were locations selected and samples placed to account for residues present at the firing point, safety fan, and target areas?