



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

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REPLY TO THE ATTENTION OF:

DW-8J

January 31, 2003

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

Re: U.S. EPA Comments on Interim
Measures Report Removal And
Bioremediation of Mine Fill B
Material

Dear Mr. Brent:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the Interim Measures Report Removal and Bioremediation of Mine Fill B (MFB) Material dated August 2002.

Comments on the document are provided as an attachment to this letter. Please revise the document to address these comments.

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

Sincerely,

Peter Ramanauskas
Environmental Engineer
WMB, Corrective Action Section

Enclosures: 1

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

Project Team Members: Allen Debus, U.S. EPA (w/ encls)

**COMMENTS ON THE INTERIM MEASURES REPORT
REMOVAL AND BIOREMEDIATION OF MINE FILL B MATERIAL
DATED AUGUST 2002
NAVAL SURFACE WARFARE CENTER
CRANE, INDIANA**

Comment 1:

Section 1.1, page 1-5: This page states in the top paragraph that contaminants likely to be present at the SWMU include explosives, SVOCs, dioxins, PCBs, and metals, yet some of these are not noted in Table 1-1 (e.g., PCB, dioxin).

Comment 2:

The last paragraph of Section 3.1.2. is confusing. Did initial characterization samples reveal this PCB contamination? Would B-161 have been the source of PCB? Verify that this area will be investigated during the MFB RFI. B-161 is not noted on Figure 1-3; nor is B-177, B-2172 or B-3299. Please provide an explanation for the presence of PCB near B-161 and 171 when the thermol boilers were near buildings 166 and 177.

Comment 3:

Table E-2 reports some metals hits over residential levels and there is a missing lead result in sample MFB ICS #297. What do the asterisks and other data qualifiers for Aluminum, Barium, and Chromium results on Table E-2 page 5 represent? The Appendix E and H tables should highlight those values that exceed a cleanup goal. The units on Table H-2 are in error. The second paragraph of Section 3.1.3 states that no metals or VOCs were detected above cleanup goals in any grid requiring excavation, yet Table E-2 page 1 shows values of mercury exceeding the residential cleanup goal (MFB ICS# 013 = 60J ppm), arsenic (MFB ICS# 001 = 7300J ppm) and selenium (MFB ICS# 090 and 092 = 820 ppm).

Comment 4:

The last paragraph of Section 2.2 on page 2-1 states that waste acetone from the field test kits was transported to ABG for treatment. Please provide an explanation for disposal of waste acetone at the ABG. The open burning of solvents is prohibited and is the reason for U.S. EPA's Subpart X Permit Condition X.D. If the waste solvent is a waste explosive that *has the potential to detonate*, then it can be open burned provided that the Subpart X unit fits the appropriate criteria. For more information see RCRA Permit Policy Compendium Document Number 9489.1988(01): *THERMAL TREATMENT UNITS, SCOPE OF SUBPART X, U.S. EPA MEMORANDUM, MAY 18 1988, SUBJECT: Morton Thiokol Thermal Treatment Units, FROM: Sylvia K. Lowrance, Director Office of Solid Waste, TO: Robert L. Duprey, Director Hazardous Waste Management Division Region VIII.*

Comment 5:

The last paragraph on page 3-1, Section 3.1.1., refers to consolidation of several grids into one larger grid for areas where blast-wall berms were covered by a thick gravel layer. Was a Field Clarification Request submitted for this? It doesn't seem to appear in Table 1-2 or in Appendix A.

Comment 6:

Referring to Table E-4, why were most samples analyzed for only Aroclor 1242, 1254, and 1260 when sample MFBICS315 detected Aroclor 1248? Furthermore, what is the source of the residential cleanup level of 66 ppm for these aroclors? What is the definition of the "D" qualifier for Aroclor 1248 detected at 13,000 ppm? It appears that Table E-4 notes the wrong units as the text in the third paragraph of Section 3.1.2. notes that "PCBs were detected in grid 137 at 13 ppm". Why was confirmation sampling as shown in Table H-4 limited to the three aroclors noted above?

Comment 7:

Page 6-2, section 6.2.3.1: The laboratory should improve their procedures for preparation of trip blanks for VOCs analyses. Given the broken vials and significant headspace, a low analyte bias would be anticipated. Also, if the 48 hour holding times were sometimes exceeded, but samples were all analyzed within 14 days, exactly by how much were holding times exceeded?

Comment 8:

Page 6-3: Samples MFBICS 400- 408 had low recoveries for the explosives analyses although it isn't indicated just how low these recoveries were.

Comment 9:

Page 6-5: Here there is mention of a low VOCs surrogate value. What is the actual result?

Comment 10:

In the middle of 4th paragraph block on page 6-5 the section beginning with the phrase "The individual LCS/LCSD percent recoveries were acceptable and MS/MSD" and ending several sentences later with the phrase "...reported RPD values were 12% and 13% respectively." should be clarified.

Comment 11:

Please provide actual tabulated MS/MSD % recovery data for the sample sets mentioned in the 3rd paragraph on page 6-6.

Comment 12:

Please submit the tabulated LCS and MS data for the m,p xylenes sample set MFBICS457-465, mentioned in the 3rd par. block on page 6-7.

Comment 13:

Page 6-11, section 6.2.4: In the 5th sentence of the 2nd paragraph in this section, ("Higher temperatures did not appear to have adversely affected results..."), on what basis could such a conclusion be formulated? Also, what kind of sample was MFB PES052 (i.e. a VOCs sample)? Given the significant headspace for trip blanks, a low analyte bias would be anticipated. Also, if the 48 hour holding times were sometimes exceeded, but samples were all analyzed within 14 days, exactly by how much were holding times exceeded?

Comment 14:

Referring to page 6-11, under 'Field QC,' in the 3rd paragraph block, could it be explained why acetone levels in a trip blank 'exceeded the calibration curve'? That sounds like an excessively high level of contamination. Also, in this same paragraph, could the sentence, "The LCS/LCSD samples were outside the QC limits for 2-butanone for the trip blank associated with samples MFBPES387-412." be clarified as to meaning?

Comment 15:

Referring to page 6-14, Field QC, what were the % RPD's reported for field duplicates for 'Day Last' samples?

Comment 16:

Please provide tabulated MS/MSD data for samples referred to on page 6-14, 3rd paragraph under Lab QC.

Comment 17:

Please provide tabulated RDX MS/MSD QC data referred to on the last paragraph of page 6-15 which was said to be off-spec.