



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

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NSWC CRANE  
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REPLY TO THE ATTENTION OF:

March 21, 2003

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 IM Work  
Plan

Dear Mr. Brent:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the PCB Capacitor Burial/Pole Yard Interim Measures Work Plan for Solid Waste Management Unit #17 dated November 2002.

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

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, SOUTH DIV (w/ encl)  
Doug Griffin, IDEM (w/ encl)  
Tony Martig, USEPA (w/ encl)

**COMMENTS ON THE INTERIM MEASURES WORK PLAN FOR  
SWMU 17 - PCB CAPACITOR BURIAL/POLE YARD - DATED NOVEMBER 2002  
NAVAL SURFACE WARFARE CENTER  
CRANE, INDIANA**

Work Plan Comments

*Comment 1:*

Sections 1.3.3.1. and 1.3.3.2. incorrectly state that Aroclor-1260 and Aroclor-1242 are congeners when they are mixtures of congeners.

*Comment 2:*

The sample designation #'s for samples cited in 1.3.3.4.3, page 1-4, seems incorrect. Should the 'SB' designations be 'SS' codes instead?

*Comment 3:*

Section 1.3.4 states that excavation areas do not move past the fence line to the west of the site into the transmission corridor. What is the plan for this area then, should contamination continue in that direction?

*Comment 4:*

Referring to Section 1.3.5., what is the future plan for the geophysical survey area should the Navy be unable to investigate all anomalies?

*Comment 5:*

Referring to Section 3.2, what is meant by "waste processing"?

*Comment 6:*

Referring to Section 3.3, please clarify what is the difference in disposal decision and completion decision. All soils will be removed to meet the 1 ppm standard, but will the concentration differences dictate to what type of landfill they may be shipped? Clarify bullet to state that post-excavation verification sample analysis will be done using a fixed lab. Clarify last bullet referring to ten additional samples in a drainage ditch. Does this refer to the northwest or southwest ditch? Place these sample locations on a figure.

*Comment 7:*

Referring to Section 3.4, refer to PCB-impacted soil as TSCA-waste and non-TSCA waste instead of hazardous/non-hazardous waste. Decontamination water containing < 3 ppm PCB may

be managed as non-hazardous.

*Comment 8:*

Referring to Section 3.5, imported fill material must contain < 1 ppm PCB.

*Comment 9:*

Referring to Section 4.3 - If the 10% of samples sent for lab analysis are not in agreement with the field results, all verification samples must be sent for lab analysis.

*Comment 10:*

In the last sentence of Section 4.3.1.1., call out Table 4-1 instead of saying "following table".

*Comment 11:*

Referring to Pages 4-1 to 4-3: Please explain the rationale for why less than 9 sample aliquots would be collected for areas smaller than 675 square feet while 9 aliquots will be used for the smaller 225 square foot grid area.

QAPP Comments

*Comment 1:*

On page 18, the second bullet refers to Pole 'Supports.' Please clarify the nature of this object.

*Comment 2:*

Referring to 'data verification and validation tasks' point no. 5 on page 19, what is meant by a 'Tier II level' data validation? Under 'quality assurance assessments,' please clarify who will review and approve the QA Plans. Under this same entry, please elaborate as to which of the 'various phases' will be audited & to what degree.

*Comment 3:*

On page 20, it should be clarified why PQLs aren't equal to 'Method QLS'. In the footnote it states the 'QLs are usually 3 - 10 times higher than the MDLs. But not here, for the 'Method QLS' are approximately 600 times higher than the MDLs. Should the footnote be changed accordingly?

*Comment 4:*

On page 23, the sample cleanup and extraction methods should also be mentioned under the 'Analytical Method/SOP' column heading. Also, how will 'Appendix IX' PCBs be reported? (As Aroclors? As select congeners? As chlorinated groups of congeners?) Prior to selecting how data will be reported, perhaps further considerations should be granted to data use.

*Comment 5:*

On page 25, which are the acceptance criteria for field duplicates? Although this page is labeled as a 'Measurement Performance Criteria Table,' acceptance criteria are absent. Surrogate QC information could be added to this page.

*Comment 6:*

On page 28, for 'verification' (lefthand column), is it intended to mean only the 0 to 12" of top (excavated) surface, (i.e. an analysis performed *following* an 'investigative' one which has resulted in soil excavation?)

*Comment 7:*

On page 29, for 'use of immunoassay kits,' (2<sup>nd</sup> column, bottom of table), there is an 'N/A' code under equipment identification. However, the QAPP SOPs make reference to immunoassay kits.

*Comment 8:*

On page 30, calibration for the immunoassay kits should be referenced on this page.

*Comment 9:*

There are many 'TBDs' cited on page 32 under the oval polygon titled 'Sample Analysis.'

*Comment 10:*

On page 39, instead of simply referring to SOP S-12, someone must be cited as being 'responsible for CA.'

*Comment 11:*

On page 42, under 'frequency of calibration,' the word 'met' is misspelled. Under '3)' in the footnote & referring to the term 'individual compound,' will congeners be measured and reported? Aroclors are mixtures of congeners, not true compounds.

*Comment 12:*

On pages 43 - 45: Referring to the 'Corrective Action' column, did the writer mean 'splits' or 'spikes' (as in MS)? Post-digest spikes are ordinarily done for metals analyses (not PCBs). What is the project rationale and purpose for collecting 'field splits,' as mentioned in the lefthand column? What acceptance criteria are proposed for determining whether split sample data are in agreement? Ordinarily PCBs samples would be 'extracted' prior to analysis, not 'digested.'

*Comment 13:*

On page 44, what is the significance of the 'Concentration level' of 3 ppb? (There is another adjacent worksheet tailored for the 1 ppb level.)

*Comment 14:*

On page 46: Is the 'laboratory spike' mentioned under 'Corrective Action' also a lab 'control spike' or a spiked, field sample (e.g. matrix spike)? Please clarify the terminology.

*Comment 15:*

On pages 50 and 54: Project assessment involves much more than data validation and audits. This worksheet should be expanded to encompass checking to see whether conformance was established with all relevant guidance and administrative SOPs, whether field and lab SOPs have been implemented properly, and if all relevant acceptance criteria for all aspects of the project have been met.

*Comment 16:*

On page 52, does 'I/E' stand for internal/external?

*Comment 17:*

Referring to SOP - PCB75110.01-05: Why is a PID relevant to this project as this is a PCB (not a VOCs) project? Is it intended to screen soils in the "dump area"?

*Comment 18:*

Referring to SOP - PCB75110.01-12: There is no QC evident whatsoever for operation of the Immunoassay test kit.

*Comment 19:*

In Attachment 2, Section 7.3.1. of SWOK's analytical SOP for PCB testing, the procedure for surrogate compound selection differs from instructions published in SW-846 Method 8082 guidance, Section 5.9. Please explain the rationale for this inconsistency in SWOK's SOP.

*Comment 20:*

Please provide recent Performance Evaluation (PE) sample data for Southwest Laboratory of Oklahoma. These PE results should be for a soil matrix for the form of PCBs (e.g. congeners, groups of congeners, or as Aroclors) consistent with how the data would be reported for the Pole Yard project.