



DEPARTMENT OF THE NAVY

CRANE DIVISION
NAVAL SURFACE WARFARE CENTER
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CRANE INDIANA 47522-5001

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NSWC CRANE
5090.3a

IN REPLY REFER TO:

5090/S4.7.3
Ser 095/3213

19 JUN 2003

U.S. Environmental Protection Agency, Region V
Waste, Pesticides, & Toxics Division
Waste Management Branch
Illinois, Indiana, and Michigan Section
ATTN: Mr. Peter Ramanauskas (DW-8J)
77 West Jackson Blvd.
Chicago, IL 60604

Dear Mr. Ramanauskas:

Crane Division, Naval Surface Warfare Center (NSWC Crane) submits responses to the May 27, 2003 U. S. EPA email comments on the PCB Capacitor Burial-Pole Yard (PCB-PY), Solid Waste Management Unit 17/04, Interim Measures (IM) planning documents. Two copies of the response to comments (RTCs), along with corresponding change pages, are provided as enclosure (1). Additional change pages are provided as enclosure (2). Please insert and replace the pages accordingly. The permit required Certification Statement is provided as enclosure (3).

NSWC Crane point of contact is Mr. Thomas J. Brent, Code 09510, telephone 812-854-6160.

Sincerely,

JAMES M. HUNSICKER
Director, Environmental
Protection Department
By direction of the Commander

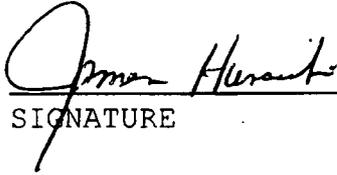
Encl:

- (1) PCB-PY IM RTCs and Corresponding Change Pages
- (2) Additional Change Pages
- (3) Certification Statement

Copy to:

ADMINISTRATIVE RECORD
SOUTHNAVFACENCOM (Code ES32)
IDEM (Doug Griffin)
IDEM (George Ritchotte)
TOLTEST (Debbie Leighty) (w/o encl)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.


SIGNATURE

Environmental Protection Department Manager
TITLE

6/19/03
DATE

5090

Ser 095/3213

19 June 2003

The letter was for the submittal of the response to comments and updated pages for the Final Interim Measures Work Plan, Health and Safety Plan, and Quality Assurance Project Plan for the PCB Capacitor Burial Pole Yard for SWMU 17. The final report was substituted for the draft report submitted 12/6/02 (Ser 2378).



*Solutions for Your Site Development,
Construction, and Environmental Projects*

June 16, 2003

Job No. 75110.01

Mr. Tom Brent
Environmental Protection Specialist
Naval Surface Warfare Center
Crane, Indiana 47522

Response to Peter Ramanaukas' Comments
FC No. 49 PCB Capacitor Burial Pole Yard,
N68950-00-D-0200 Environmental Job Order Contract,
Various Midwest States,
Great Lakes, IL

Dear Mr. Brent:

On May 27, 2003 Peter Ramanaukas, Environmental Engineer for the Corrective Action Section of the U.S. EPA Region V, made the following comments regarding the FC No. 49 PCB Capacitor Burial/Pole Yard Interim Measures Work Plan for Solid Waste Management Unit #17, dated November 2002. TolTest's response to Mr. Ramanaukas' comments may be incorporated into the final Interim Measures Work Plan by referencing this document.

Comment 1:

Generally referring to Comment 11 regarding 9-point composite verification sampling and field test kits (Section 4.2 and 4.3 in particular), please note that we can accept field test kit analysis with 10% lab verification for determining initial excavation limits for the > 25 ppm soils and > 1 ppm soils; however, when grid based post-remediation verification sampling will take place for the final 1 ppm cleanup level, all 9-point composite samples must be lab analyzed in accordance with TSCA regulations (40 CFR 761.292). It is this reviewer's understanding that Crane will remove soils to a final 1 ppm cleanup level. Sections 4.2 and 4.3 of the workplan and Worksheet #9a of the QAPP should be clarified to reflect the comments noted above and clarify that for > 25 ppm PCB soil excavation and disposal, the excavation will not be backfilled unless post-remediation verification sampling confirms cleanup to 1 ppm or below. How did Crane determine 13 field and lab sample locations noted in QAPP Worksheets #22a and #24a when a verification sampling grid has not yet been laid out?

Response:

Section 4.2 has been rewritten as follows:

"Field test kits will be used during removal activities to determine disposal decisions and project completion decisions. If the field sample indicates that the concentration of PCBs in the soil is below the clean up objective, the excavation activities will be stopped in that area and soil confirmation samples will be collected. Field screening, with lab confirmation, will be completed at the 25 ppm boundary for disposal decisions and at the 1 ppm boundary for project completion decisions. For areas that fail the screening, additional soils will be

excavated. Testing and excavation will be performed until the area passes screening. Excavations will not be backfilled until Post-remediation Verification sampling confirms cleanup to 1 ppm or below."

The first paragraph in Section 4.3 has been changed as follows:

"The goal of verification sampling is to ensure that cleanup has occurred based on the guidelines described in the TSCA regulations (40 CFR 761 Subpart 0). Two excavation scenarios are addressed with this verification sampling. The surficial excavation scenario pertains to a situation where the width of the excavation is greater than the depth. The pit excavation scenario will be for excavations that are deeper than 1 meter. Ten percent of samples with less than 25 ppm of PCBs, and 100 percent of samples with less than 1 ppm of PCBs, as indicated by the field analysis, will be sent to Southwest Laboratory of Oklahoma, Inc. (SW Labs) for analysis. If the verification samples with less than 25 ppm PCBs are not in agreement with the field results, all verification samples will be sent for lab analysis. If all of the samples with less than 1 ppm PCBs are not in agreement with the field results, the area will be resampled and verification sampling will be repeated until they are in complete agreement. The rules for the verification sampling grid area are as follows:"

The Third Sub-bullet of the Second Bullet of Worksheet 9a has been changed as follows:

"Take confirmatory (Post-Remediation Verification) samples. 100% of samples with less than 1 ppm PCBs will be sent to the lab for analysis. If all of the samples with less than 1 ppm PCBs are not in agreement with the field results, the area will be resampled and verification sampling will be repeated with all verification samples going to the laboratory. Excavations will not be backfilled until Post-Remediation Verification sampling confirms cleanup to 1 ppm or below."

The "Number of Sample Locations" in all four boxes of Tables 22a and 24a have been changed as follows: "Unknown at this time"

Comment 2:

Referring to Response to QAPP comment #3, Crane should cite their PQLs or otherwise method 'reporting limits' not MDLs.

Response:

The tables on pages 20 and 21 have been corrected in their respective order:

Analyte	CAS Number	Project Action Limit (mg/Kg) (dry weight)	Project Quantitation Limits (mg/kg) (dry weight)	Analytical Method
				PQLs (ug/kg) ¹
Aroclor-1016	12674-11-2	25.0	1.0	72
Aroclor-1221	11104-28-2	25.0	1.0	78
Aroclor-1232	11141-16-5	25.0	1.0	39
Aroclor-1242	53469-21-9	25.0	1.0	45

Aroclor-1248	12672-29-6	25.0	1.0	42
Aroclor-1254	11097-69-1	25.0	1.0	33
Aroclor-1260	11096-82-5	25.0	1.0	60

Analyte	CAS Number	Project Action Limit (mg/Kg) (dry weight)	Project Quantitation Limits (mg/l) (dry weight)	Analytical Method
				PQLs (ug/l) ¹
Aroclor-1016	12674-11-2	25.0	1.0	1
Aroclor-1221	11104-28-2	25.0	1.0	2
Aroclor-1232	11141-16-5	25.0	1.0	3
Aroclor-1242	53469-21-9	25.0	1.0	1
Aroclor-1248	12672-29-6	25.0	1.0	1
Aroclor-1254	11097-69-1	25.0	1.0	1
Aroclor-1260	11096-82-5	25.0	1.0	2

Comment 3:

Referring to Response to QAPP comment #5, for some reason field duplicates were not addressed in the revision, which was one intent of the original comment.

Response:

The following line has been added to the bottom of Worksheet 11, pages 25 and 26:

DQIs: Relative Percent Difference; Measurement Performance Criteria: Precision/ RPD +/- 35%;
Sample/Performance Measurement: Field Duplicates; Assesses for: A

In addition, the following has been added to the "DQI" column for "blanks" on pages 25 and 26:
"Relative Percent Difference"

Comment 4:

Referring to the PCB immunoassay test provided in Response to Comment 18, under the QC section, section 4.0, bullet 6, method 8082 should be cited as the method to match the QAPP. We'd like to reiterate how important it is to follow the manufacturer's recommendations on holding times & temperature control of test kits prior to their use. Is there any system of documentation Crane's field crew can devise to answer questions after-the-fact in case they should arise as to the suitability of the test kits? Referring to Section 6.3 of the SOP, QA/QC should be fleshed out a bit as to how or to the extent to which Crane will implement each of these QC sample types & elements.

Response:

"8080" in Section 4.0 has been changed to "8082".

Section 1.0 has been rewritten as follows:

"Manufacturer's recommendations will be precisely followed in lieu of this SOP. A form has been created per the manufacturer's recommendation and all procedures will be recorded in full in order to maintain complete documentation. The form is included as Attachment 1."

The QA/QC paragraph of Section 6.0 has been changed as follows:

"The validity of field test results can be substantially enhanced by employing a modest, but effective QA/QC plan. The following recommendations have been developed based on the data quality principles established by the U.S. EPA. At a minimum, each principle will be employed during all field testing activities.

- **Sample Documentation** - All samples will be documented to include the following: Date/time of sampling; Sampler's signature; Brief description of sample(s) appearance; Sample numbers; Sampling location(s), including detailed sketch; and Number and type of sampling containers prepared at each location and corresponding analytical method(s) to be used.
- **Field analysis documentation** - All samples will be documented to include the following: Raw data; Calibration; Calculations; and Final results of field analysis for all samples screened (including QC samples).

Method calibration - This is an integral part of the EnSys immunoassay tests; A duplicate calibration will be performed for each set of samples tested. The instructions in the User's Guide will be used for proper techniques.

- **Site-specific matrix background field analysis** - For each set of samples tested, an uncontaminated sample from the site matrix will be collected and field analyzed to document the matrix effect.
- **Duplicate sample field analysis** - At least one of every 20 samples will be analyzed in duplicate to document the method of repeatability.
- **Confirmation of field analysis** - 10 percent of samples with less than 25 ppm of PCBs, and 100 percent of samples with less than 1 ppm of PCBs, as indicated by the field analysis, will be sent to Southwest Laboratory of Oklahoma, Inc. (SW Labs) for analysis. If the verification samples with less than 25 ppm PCBs are not in agreement with the field results, all verification samples will be sent for lab analysis. If all of the samples with less than 1 ppm PCBs are not in agreement with the field results, the area will be resampled and verification sampling will be repeated until they are in complete agreement. Chain of custody and other documentation used will be maintained in this file.

C Mr. Brent
US Navy

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- Performance evaluation sample field analysis (optional, but strongly recommended) - A performance evaluation sample will be field analyzed daily to document method/operator performance.

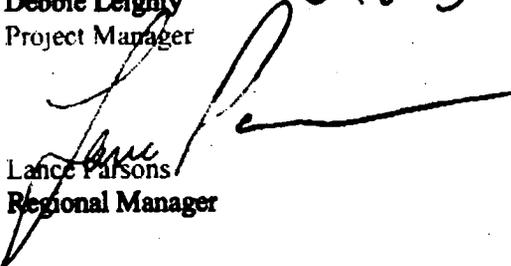
Matrix spike field analysis (optional) - A matrix spike will be field analyzed for each set of samples tested in order to document the matrix effect on analyte measurement."

TolTest appreciates the opportunity to respond to Mr. Ramanauskas' comments. Should further clarification concerning this document be necessary, please do not hesitate to contact us at 812-636-8501.

Respectfully Submitted,

TOLTEST, Inc.


Debbie Leighty
Project Manager


Lance Parsons
Regional Manager

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