



DEPARTMENT OF THE NAVY

CRANE DIVISION  
NAVAL SURFACE WARFARE CENTER  
300 HIGHWAY 361  
CRANE INDIANA 47522-5001

IN REPLY REFER TO:

5090/S4.7.3  
Ser 095/3232

**2 JUL 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 June 30, 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). The permit required Certification Statement is provided as enclosure (2).

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

Sincerely,

A handwritten signature in cursive script that reads "James M. Hunsicker".

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

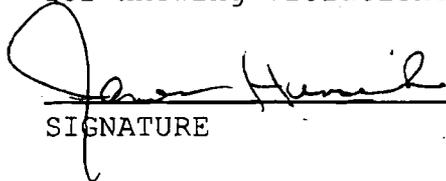
Encl:

- (1) PCB-PY IM RTCs and Corresponding Change Pages
- (2) 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

7/2/03  
DATE

July 3, 2003

Job No. 75110.01

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

**Response to Peter Ramanauskas' 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 June 30, 2003 Peter Ramanauskas, 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. Ramanauskas' comments may be incorporated into the final Interim Measures Work Plan by referencing this document.

**Comment 1:**

Referring to the QAPP worksheet #9b (pages 20 and 21). These tables still appear to contain errors. Let's start with the soil matrix table. It seems that the project action limit for PCBs has increased to 25 mg/kg from 1 mg/kg in this latest revision. Isn't our set action limit 1 ppm for final cleanup of soils?

**Response:**

The following changes have been made to worksheet #9b of the QAPP (page 20 – Soil Matrix Table):

The project action limit has been changed from 25 mg/kg to 1 mg/kg.

**Comment 2:**

For the Decon Water table, why is there a 25 mg/kg action limit? Shouldn't this be 3 ppm in mg/L units?

**Response:**

The following changes have been made to worksheet #9b of the QAPP (page 21 – Decontamination Water Table):

The project action limit has been changed from 25 mg/kg to 3 mg/l.

**Comment 3:**

It seems that the PQL column units should be in mg/L.

**C** **Response:**

The following changes have been made to worksheets #9b of the QAPP (pages 20 and 21):

The units listed under the Analytical Method/PQL have been changed from ug/kg to mg/kg in the Soil table and from ug/kg to mg/l in the Decon Water table.

**Comment 4:**

Footnote 1 is missing from these tables.

**Response:**

The following changes have been made to worksheets #9b of the QAPP (pages 20 and 21):

Footnote 1 has been completely removed from these tables, including the "1" noted in the heading.

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

Respectfully Submitted,

**TOLTEST, Inc.**

**C**  
Debbie Leighty  
Project Manager

Lance Parsons  
Regional Manager

**C**

5090  
Ser 095/3232

2 July 2003

The letter Ser 095/3232 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).