



DEPARTMENT OF THE NAVY
CRANE DIVISION
NAVAL SURFACE WARFARE CENTER
390 HIGHWAY 301
CRANE INDIANA 47522-5001

N00164.AR.000959
NSWC CRANE
5090.3a
IN REPLY REFER TO
5090/S4.7.1
Ser RP3/5195
7 JUN 2005

Indiana Department of Environmental Management
Corrective Action Section
Office Of Land Quality
Hazardous Waste Permits
100 N Senate Ave
PO Box 6015
Indianapolis, In 46206-6015

Dear Mr. Griffin:

Crane Division, Naval Surface Warfare Center submits responses to comments on the proposal for no further sampling at Solid Waste Management Unit (SWMU) 15, the Roads and Grounds Area, as enclosure (1). The permit required Certification Statement is provided as enclosure (2).

If you require any further information, my point of contact is Mr. Thomas J. Brent; Code RP3-TB, at 812-854-6160, email thomas.brent@navy.mil.

Sincerely,

JAMES M. HUNSICKER
Manager, Environmental Protection
By direction of the Commanding Officer

Enclosures: 1. Responses to Comments on No Further Sampling
Proposal at SWMU 15
2. Certification Statement

Copy to:
ADMINISTRATIVE RECORD
SOUTHNAVFACENCOM (Code ES31) (w/o encl)
USEPA (Pete Ramanauskas)
TTNUS (Ralph Basinski) (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

Manager, Environmental Protection
TITLE

6/07/05
DATE

Response 4:

The Navy concurs that there are no detections of contamination in surface water samples in excess of Maximum Contaminant Levels (MCLs), except for benzo(a)pyrene (BaP). There were two detections of BaP in storm water samples of approximately 2 ug/L. The BaP MCL is 0.2 ug/L. MCLs, however, are applicable to drinking water and the storm water will not be used for drinking water. Iron was also detected in storm water at concentrations (764 and 976 ug/L) that exceed the secondary MCL of 300 ug/L. It is believed that there enough data have been collected to characterize risk, as well as the nature and extent of contamination at SWMU 15. The toxicity testing will supplement the current data sets to characterize site-specific risk associated with exposure to sediments.

Comment 5:

Table A1-3 Sediment – Lots of hits into the ppm range for PAHs

This table shows detections for a group of PAHs along a single stretch of stream about 300 yards long. They are high enough so that they need to be addressed in the human health risk assessment of the RFI Report.

Human Health (all conc in ppb)	RISC Res Direct	RISC Direct	Ind	EDQL	SD 6	SD 15	SD 16	SD 17
BENZO(A)PYRENE	500	1500	150	150	4150	2850	1100	1300
BENZO(G,H,I)PERYLENE	500	1500	170	170	4200	2250	1200	1600
BENZO(K)FLUORANTHENE	50500	153000	240	240	2100	1700	680	760
CHRYSENE	504700	1534000	166	166	4750	3750	1200	1500
FLUORANTHENE	6315400	16005000	423	423	12000	7700	2800	3400
INDENO(1,2,3-CD)PYRENE	5000	15300	200	200	3450	2100	1000	1300
PHENANTHRENE	1120600	2839000	204	204	10550	8100	2500	3200
PYRENE	5481700	14739000	195	195	16000	9900	2800	3400

This table is the same set of samples compared to the Region V EDQLs. This represents major exceedences in a significant number of constituents and needs a very careful look.

ECO (all conc in ppb)	EDQL	5 * EDQL	10 * EDQL	SD 6	SD 15	SD 16	SD 17
BENZO(A)PYRENE	150	750	1500	4150	2850	1100	1300
BENZO(G,H,I)PERYLENE	170	850	1700	4200	2250	1200	1600
BENZO(K)FLUORANTHENE	240	1200	2400	2100	1700	680	760
CHRYSENE	166	830	1660	4750	3750	1200	1500
FLUORANTHENE	423	2115	4230	12000	7700	2800	3400
INDENO(1,2,3-CD)PYRENE	200	1000	2000	3450	2100	1000	1300
PHENANTHRENE	204	1020	2040	10550	8100	2500	3200
PYRENE	195	975	1950	16000	9900	2800	3400

Exceeds 5 * EDQL

Exceeds 10 * EDQL

Response 5:

The Navy concurs that there were several detections of PAHs in sediment that were in excess of human health and ecological risk-based screening concentrations. Those exceedences will be evaluated in the RFI report with regard to the risks posed to human health and the environment, as well as the nature and extent of contamination. The Navy is, however, collecting samples for toxicity testing of sediments. These samples will be used to evaluate site-specific toxicity of sediments to aquatic organisms.

**RESPONSE TO INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT (IDEM)
COMMENTS (DATED MAY 20, 2005) REGARDING THE PROPOSAL FOR NO FURTHER
SAMPLING AT NSWC CRANE SOLID WASTE MANAGEMENT UNIT (SMWU) 15**

Note: All evaluations to date have been based on a mixture of validated and unvalidated data.

Comment 1:

I want to clarify that you are not proposing no further action...just saying that you have a sufficient number of samples.

Response 1:

Yes, it is true that no further action is *not* being proposed. It is believed that a sufficient number of samples have been collected to proceed with the RFI report. Whether any further action is necessary should become evident after completion of the RFI risk evaluations. It is worth noting that the Navy is conducting toxicity testing of steam sediments to supplement the current data set. These samples will be used to evaluate site-specific toxicity of sediments to aquatic organisms.

Comment 2:

Table A1-1 Soil data...there are no significant detections except BaP and other PAHs at SB3, which is a surface hit by RR tracks.

Response 2:

The Navy concurs that there are no significant detections of contamination except benzo(a)pyrene (BaP) and other polycyclic aromatic hydrocarbons (PAHs) at soil boring 3 (SB3), which represents a detection of PAHs in surface soil near railroad tracks.

Comment 3:

Table A1-2 Perched Groundwater...no meaningful detections

Response 3:

The Navy concurs that there are no meaningful detections of contamination in perched groundwater samples.

Comment 4:

Table A1-5 Storm Sewer water samples...no detections above MCLs

Table A1-4 Surface Water – Nothing close to MCLs, but BaP above EDQLs along a section of one creek.

ECO (all conc in ppb)	EDQL	5 * EDQL	10 * EDQL	SD 6	SD 15	SD 16	SD 17
BENZO(A)PYRENE	.014	.07	.14	.275	.1	.14	.12
BENZO(G,H,I)PERYLENE	7.64	38.2	76.4	.27	.11	.13	.11
BENZO(K)FLUORANTHENE	NA						
CHRYSENE	NA						
FLUORANTHENE	1.9	9.5	19	1.415	.15	.81	.71
INDENO(1,2,3-CD)PYRENE	4.31	21.55	43.1	.24		.09	.09
PHENANTHRENE	3.6	18	36	.55	.09	.34	.28
PYRENE	0.3	1.5	3	1.13	.12	.57	.53

Exceeds 5 * EDQL

Exceeds 10 * EDQL