



DEPARTMENT OF THE NAVY

CRANE DIVISION
NAVAL SURFACE WARFARE CENTER
300 HIGHWAY 361
CRANE, INDIANA 47522-5000

N00164.AR.000990
NSWC CRANE
5090.3a

IN REPLY REFER TO
5090/H1.4.5
Ser RP3/5319

11 OCT 2005

Indiana Department Of Environmental Management
Office Of Land Quality / Permits Branch
Hazardous Waste Permit Section
100 North Senate Avenue
Mc 65-45 IGCN 1101
Indianapolis, IN 46204-2251

Dear Mr. Workman:

Crane Division, Naval Surface Warfare Center requests a determination on the annual 40 Code of Federal Regulations (CFR) Part 264 Appendix IX ground water monitoring parameters for the Old Rifle Range (ORR) in advance of the permit renewal. Appendix IX samples are collected and analyzed for Volatile Organic Compounds (VOC), Semi-Volatile Organic Compounds (SVOCs), and Dioxins/Furans at the ORR. Sources of SVOCs have been identified and as such, NSWC Crane recognizes the need to continue to sample for those parameters. However, there are no processes at the ORR that would result in releases of VOCs or Dioxins/Furans to the ground water.

On October 29, 2003, NSWC Crane requested a Class 3 modification of the Final Open Burning/Open Detonation (OB/OD) Hazardous Waste Management Permit dated January 13, 2000. The modification requested the deletion of VOCs, SVOCs, Dioxins/Furans, Pesticides, Herbicides, and Polychlorinated Biphenyls (PCBs) from the annual ground water monitoring requirements at the Ammunition Burning Grounds (ABG) and ORR. On May 3, 2004, the U. S. EPA approved deletion of Pesticides, Herbicides, and PCBs since the contaminants had not been detected in ground water and the three classes of contaminants are not treated by OB operations at the ABG or ORR. The U. S. EPA approval letter stated that deletion of annual monitoring for VOCs, SVOCs, or Dioxins/Furans was not granted because these types of materials are components of treated substances or have the potential to be generated during treatment operations. The approval letter is attached as enclosure (1).

As previously stated, there are no operations at the ORR that have treated materials that could generate Dioxins/Furans or VOCs. Additionally, Section 1.4.2.2 of the Final Quality Assurance Project Plan for RCRA Ground Water Monitoring at the Ammunition Burning Grounds, Old Rifle Range, and Demolition Range states that, "if these chemicals are not detected during the

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first annual sampling, a permit modification specifying a reduced list of Appendix IX parameters will be requested for approval by the U. S. EPA for future annual monitoring activities." After sampling for five years, it has been determined that there are no additional hazardous constituents from the list of Appendix IX parameters of statistical importance at the ORR.

Enclosure (2) contains the Annual Summary of Results for the years 2000 through 2005 for the ORR. Notice that there are no VOC hits and it is difficult to determine a trend in the Dioxin results as they occur sporadically in different wells over different monitoring events. The permit required Certification Statement is provided as enclosure (3).

Based on the above information, NSWC Crane would like to know if IDEM would consider eliminating VOCs and Dioxins/Furans from the annual monitoring requirements at the ORR, as part of the permit renewal. 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,


for JAMES M. HUNSICKER

Manager, Environmental Protection
By direction of the Commanding Officer

- Enclosures: 1. May 3, 2004 Class 3 Permit Modification Approval
2. Annual Monitoring Results for the ORR
3. Certification Statement

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

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.

Christine D. Freeman
SIGNATURE

For Manager, Environmental Protection
TITLE

10/11/05
DATE