



DEPARTMENT OF THE NAVY
CRANE DIVISION
NAVAL SURFACE WARFARE CENTER
300 HIGHWAY 361
CRANE, INDIANA 47522-5000

N00164.AR.001022
NSWC CRANE
5090.3a

IN REPLY REFER TO:
5090/S4.7.6
Ser PRCR4/6128
25 APR 2006

U.S. Environmental Protection Agency, Region V
Waste, Pesticides, & Toxics Division
Waste Management Branch
Corrective Action Section
77 West Jackson Blvd.
Chicago, IL 60604

Dear Mr. Ramanauskas:

Crane Division, Naval Surface Warfare Center submits the Final Statement of Basis (SB) for Rockeye, Solid Waste Management Unit 10 as enclosure (1). Also presented as enclosure (2), are the responses to the U. S. EPA comments on the SB. 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 PRCR4-TB, at 812-854-6160, email thomas.brent@navy.mil.

Sincerely,

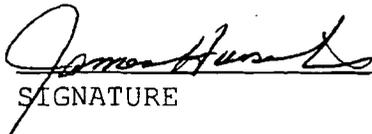
A handwritten signature in cursive script that reads "J. M. Hunsicker".

J. M. HUNSICKER
Environmental Site Manager
By direction of the Commanding Officer

Enclosures: 1. Final SB for Rockeye
2. Responses to U. S. EPA Comments
3. Certification Statement

Copy to:
ADMINISTRATIVE RECORD
SOUTHNAVFACENCOM (Code ES31) (w/o encl)
IDEM (Doug Griffin)
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

4/25/00
DATE

RESPONSES TO ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS (DATED 16 MARCH 2006) REGARDING THE STATEMENT OF BASIS (SB) FOR SOLID WASTE MANAGEMENT UNIT (SWMU) 10, NAVAL SURFACE WARFARE CENTER (NSWC) CRANE, CRANE, INDIANA

Comment 1:

Combine the information presented in the Proposed Remedy section on page 2 with the Rationale for Selecting the Proposed Remedy section on page 7.

Response to Comment 1:

The requested consolidation of text from the "Proposed Remedy" section with text in the "Rationale for Selecting the Proposed Remedy" has been done.

In addition, because there is no longer a "Proposed Remedy" section, the title of the "Rationale..." section has been changed to: "Proposed Remedy and Rational for Selection of the Proposed Remedy."

Comment 2:

Figure 3: include a legend identifying the brown squares and borders/boundaries shown.

Response to Comment 2:

On Figure 3 the squares have been deleted and the dashed line (fence line) has also been deleted because they tended to clutter the figure without adding materially to the understanding of the site layout. The thick solid line around the SWMU is now identified on the figure as the SWMU boundary. In addition, building 2733, which is referenced in the text, and a couple of other buildings are now identified on Figures 3 and 4.

Comment 3:

Referring to the groundwater, in addition to suggested changed text provided in Tetra Tech's March 3rd email response, state that all nickel detections were below IDEM Residential Groundwater Closure values.

Instead of the last sentence of saying "Therefore, metals were eliminated from further consideration", state that although elevated iron and manganese levels cannot be associated with any known present or past SWMU operations, groundwater use will be restricted under the Land Use Control for this SWMU. The LUC boundary shown in Figure 4 should be extended to include the SWMU proper as an industrial site and include wells exhibiting elevated levels of metals. Extending the LUC to these areas will provide a notification mechanism of elevated groundwater metals concentrations should land use change to the hypothetical residential use which presents an ingestion risk to receptors.

Response to Comment 3:

The following statement has been to the end of the third paragraph under "Summary of Rockeye Risks" in the left column of page 4:

"All nickel detections were below IDEM Residential Groundwater Closure values."

Per the electronic mail message of March 3, 2006 and this comment, the text of the last paragraph in the left column of page 4 and first paragraph in the right column of page 4 has been changed as follows:

"The elevated manganese concentrations causing unacceptable groundwater risks cannot be associated with any known present or past SWMU operations. There are no known source areas or spills, well-defined plumes, or other recognizable spatial patterns of manganese concentrations that are evident. Although elevated iron and manganese

levels cannot be associated with any known present or past SWMU operations, groundwater use will be restricted under the Land Use Controls for this SWMU. Therefore, metals were eliminated from further consideration for monitoring. The contaminants requiring remediation are the explosives-related...

The LUC boundary shown in Figure 4 has been extended to include the SWMU proper as an industrial site. The designation of the boundary has also been changed to "LUC Boundary 1". Numbering the boundary will facilitate discriminating between the current LUC boundary and any new boundaries that may be used in the future.

4) For the last paragraph of the right column on page 4, state that to date no surface water detections have exceeded the Surface Water MCS values. For Table 1, include the source information for the GW MCS values as a footnote. Were ecological MCSs in surface water evaluated for 2-A-4,6-DNT, 4-A-2,6-DNT, and TNT as was done for RDX?

The following sentence has been added to the end of the last paragraph of the right column on page 4:
"To date, no surface water detections have exceeded the surface water MCS values."

Source information for both the groundwater and surface water MCS values are now included as footnotes 1 and 2 to Table 1.

Regarding ecological MCS evaluations for 2-A-4,6-DNT, 4-A-2,6-DNT, and TNT, during the RFI investigation the maximum observed concentrations of these compounds did not exceed the alternate concentrations limits (ACLS) used during Step 3a of the tiered ecological risk assessment protocol. ACLs were used because there were no EPA Region 5 Ecological Screening Values (ESVs). The table below shows a comparison of the maximum detected concentrations of these compounds compared to the ACLs.

Parameter	Alternate Concentration Limit (Step 3a), ug/L	Maximum Observed Concentration, ug/L
2,4,6-Trinitrotoluene	90	4.4
2-Amino-4,6-dinitrotoluene	20	1.3
4-Amino-2,6-dinitrotoluene	20	1.4

Because the concentrations of these chemicals did not exceed the ACLs, they are not considered to be of concern.

5) Modify the Public Participation section as we have discussed.

Also, did you ever mail the hardcopy response to comments and figure for the RKI CMS? I got your email with the response, but don't think I ever got the hardcopy.

Response to Comment 5:

The Public Comment section of the Statement of Basis has been revised in accordance with previous agreements between EPA and Navy.

The hardcopy response to comments and figure for the RKI CMS are being addressed separately from this response document.

6) Additional, unsolicited changes:

A few minor editorial changes were made to correct previously unidentified grammatical errors or to modify text slightly to clarify the intent. In no instance, however, was the intent or technical content altered. As an example, perhaps the most significant change was to move the second sentence from the paragraph immediately before "Scope of Corrective Action" to the last sentence of the of previous paragraph. These two paragraphs now appear at the top of the left column on page 4.

5090

Ser PRCR4/6128

25 April 2006

The letter Ser PRCR4/6128 was for the submittal of the final Statement of Basis for Rockeye SWMU 10/15 and responses to EPA comments. The final report replaces the report dated 2/2/06 making it the final report.