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NSWC CRANE
5090.3a



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

IN REPLY REFER TO:

5090/S4.7.6
Ser PRCR4/6161
2 JUN 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 revisions to the Revised Final Statement of Basis (SB) for the Dye Burial Grounds (DBG), Solid Waste Management 02. One copy is presented as enclosure (1) for your approval. Responses to your May 2006 comments are presented as enclosure (2). The permit required Certification Statement is provided as enclosure (3).

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,

J. M. Hunsicker

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

Enclosures: 1. Revisions to the Revised Final DBG SB
2. Responses to May 2006 Comments
3. Certification Statement

Copy to:
ADMINISTRATIVE RECORD
SOUTHNAVFACENGCOM (Code ES31) (w/o encl)
IDEM (Doug Griffin)
TTNUS (Ralph Basinski) (w/o encl)
NAVFAC MW (Howard Hickey)

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

6/2/06
DATE

RESPONSE TO COMMENTS

RESPONSES TO UNITED STATES ENVIRONMENTAL PROTECTION AGENCY COMMENTS (DATED 11 MAY 2006) CONCERNING THE STATEMENT OF BASIS (DATED APRIL, 2006) FOR NAVAL SURFACE WARFARE CENTER CRANE SOLID WASTE MANAGEMENT UNIT #02/11

Comment 1:

There is a problem with inconsistent use of units. For example, in the text on page 5, the MCS for Acid Orange 10 is reported as 150,000 mg/kg, while Table one reports it as 150,000 µg/kg.

Response 1:

The correct units for the Acid Orange 10 MCS are ug/kg and the text has been corrected to reflect this. In addition the following changes were made:

- Recently computed soil MCS values for several dyes that did not have MCSs in Table 1 of the Statement of Basis have been entered into Table 1. The revised Table is included as Attachment 1 to this response to comments document.
- With the addition of new MCS values, Acid Yellow 23 now has an MCS value so sentence 5 of the last paragraph in the left column of page 5 has been changed to the following:
"Of the two detected dyes, Acid Yellow 23 has an MCS of 49,000,000 µg/kg and the maximum concentration was much less (i.e., 12,000 µg/kg); the Acid Orange 10 maximum concentration was 4,200 µg/kg which is much less than the 150,000 µg/kg MCS."

Note that concentrations of mg/kg for Acid Yellow 23 and Acid Orange 10 were converted to equivalent ug/kg units to make it easier to compare the cited concentrations with the MCSs in Table 1.

- Pigment Red 1 and Smoke Dye were removed from the list of dyes in Table 1 because these dyes were not analyzed at SWMU 2 and should not have been on the table.

Note that the changes to Table 1 render the table more complete and consistent with the Corrective Measures implementation Plan for SWMU 2.

Comment 2:

The left column on page 6 states that the objective of this corrective action is to monitor that acceptable contaminant concentrations are eventually achieved through natural processes. As stated before, we do not have natural attenuation occurring here. This should be changed. Similarly, 'Other Considerations' on the same page refers to timeframes for achieving cleanup. 'Proposed Remedy and Rationale for Selection' on page 7 refers to contaminated groundwater and acceptable timeframes for remedy performance. What are those acceptable timeframes? This section also states that it is probable that organic contaminants will degrade naturally and monitoring data will ensure that LUCs remain in place until concentrations reach acceptable levels. To what monitoring does this refer? There are no GW detections and no degradation monitoring is proposed for dye material under the cap. This should be changed.

Response 2:

The last sentence of "Alternative No. 2..." in the left column of page 6 has been changed as follows:
"The objective of this corrective action would be to warn of groundwater contamination from dyes underneath the cap and to protect the public and the environment by prohibiting groundwater use and inappropriate use of the site."

The third sentence under "Other Considerations" has been changed as follows:

Therefore, the details of monitoring such as the actual monitoring concentration limits will be established during the design of the final remedy that is accepted by EPA and the public."

Sentence 1 under "Proposed Remedy and Rationale for Selection" on page 7 has been changed as follows:

"Alternative 1 would not be sufficiently protective of human health and the environment because it would not prevent potential future exposure to soils under the cap."

The second-to-last sentence of the last full paragraph in the left column of page 7 has been deleted.

The last sentence of the last full paragraph in the left column of page 7 has been changed as follows:

"The monitoring data will provide information useful for ensuring that land use controls remain effective."

In the last paragraph of the right column on page 7, "within acceptable timeframes" has been deleted.

Comment 3:

Alternative 3 on page 6 notes that 31,000 cubic yards of material would require excavation. The October 28, 2004 Response to Comments states 19,000 cubic yards would require excavation. This needs to be corrected. Verify that the Alternative 3 cost accurately reflects excavation of this soil volume.

The 31,000 cubic yards has been verified to be the correct value representing the amount of material that would require excavation under Corrective Action Alternative 3. Excavation costs were based on the 31,000 cubic yards.

No change has been made in response to this comment.

**Attachment 1
Revised Table 1 of the SWMU 2 Statement of Basis**

TABLE 1

**MEDIA CLEANUP STANDARDS FOR MILITARY DYES ANALYZED IN
SOIL
SWMU 2 - DYE BURIAL GROUNDS
NSWC CRANE
CRANE, INDIANA**

Dye	Preliminary Risk-Based Target Levels - Human Health (µg/kg)	Preliminary Risk-Based Target Levels - Ecological (µg/kg)
Acid Blue 1	760,000 ⁽¹⁾	10,000 ⁽¹⁾
Acid Blue 9	380,000,000 ⁽¹⁾	1,630,000 ⁽¹⁾
Acid Blue 45	380,000,000	1,630,000
Acid Red 64	--	---
Acid Yellow 3	3,100,000	129,000
Acid Yellow 23	49,000,000	11,475,000
Acid Yellow 73	950,000	2,000
Acid Orange 10	150,000 ⁽¹⁾	6,460 ⁽¹⁾
Basic Violet 10	950,000 ⁽¹⁾	12,000 ⁽¹⁾
Basic Yellow 2	100,000 ⁽¹⁾	1,300 ⁽¹⁾
1-Aminoanthraquinone	14,700	---
2-Aminoanthraquinone	14,700 ⁽¹⁾	---
Disperse Blue 14	490,000	42,000
Disperse Red 9	490,000	42,000
Disperse Violet 1	490,000	42,000
Solvent Green 3	125,000	108,000
Solvent Orange 3	1,000,000 ⁽¹⁾	129,000 ⁽¹⁾
Solvent Orange 7	1,200,000 ⁽¹⁾	52,000 ⁽¹⁾
Solvent Red 1	1,200,000	52,000
Solvent Red 24	1,200,000	52,000
Solvent Yellow 2	110 ⁽¹⁾	26,000 ⁽¹⁾
Solvent Yellow 3	130 ⁽¹⁾	---
Solvent Yellow 14	760,000	3,230 ⁽¹⁾
Solvent Yellow 33	3,100,000	129,000

1 Values taken from TtNUS, 2004.

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Ser PRCR4/6161

2 June 2006

The letter Ser PRCR4/6161 was for the
submittal of the revisions to the revised
Final Statement of Basis (SB) for Dye
Burial Ground (DBG) SWMU 02/11. The final
report replaces the report dated 12/14/05
making it the final report.