



DEPARTMENT OF THE NAVY

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

N00164.AR.001043
NSWC CRANE
5090.3a

IN REPLY REFER TO:

5090/S4.7.3
Ser PRCR4/6199
30 JUN 2006

Indiana Department Of Environmental Management
Office Of Land Quality
Hazardous Waste Permits
100 North Senate Ave.
MC 64-45 IGCN 1101
Indianapolis, IN 46204-2251

Dear Mr. Griffin:

Crane Division, Naval Surface Warfare Center (NSWC Crane) submits the Final Interim Measures Work Plan for the Building 106 Pond (B106P), Solid Waste Management Unit 08. The June 9, 2006 IDEM comments did not result in the need to make changes to the draft version of the IMWP. However, per agreement with the NSWC Crane Wastewater Treatment Plant, changes were made to the IMWP to reflect the management of the wastewaters from the B106P remediation activities. Enclosure (1) contains a copy of the responses to IDEM comments. The Final IMWP is 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. Responses to the June 9, 2006 IDEM Comments
2. Final B106P IMWP
3. Certification Statement

Copy to:

ADMINISTRATIVE RECORD
SOUTHNAVFACENCOM (Code ES31) (w/o encl)
USEPA (Pete Ramanauskas)
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.

James Hensche
SIGNATURE

Manager, Environmental Protection
TITLE

6/30/06
DATE

RESPONSES TO THE JUNE 9, 2006 IDEM COMMENTS

From: GRIFFIN, DOUG [mailto:DGRIFIN@idem.IN.gov]
Sent: Friday, June 09, 2006 10:00
To: Gates, William H CIV EFDSOUTH
Subject: SWMU 8 IMWP comments

Bill, since this is needed in a hurry I'll send my comments this way instead of by snail mail.

Comments specific to this work plan:

First a caveat; I am only commenting on my part of the plan. I am not commenting on issues related to air, NPDES, stormwater runoff, or disposal.

The Navy understands that IDEM's review did not cover IMWP content relative to management of wastewaters discharged from remedial activities to the NSWC Crane industrial wastewater treatment plant (IWWTP), storm water runoff, or emissions from remedial action activities (primarily air stripper) to air. However, the following information is provided regarding how these issues were addressed.

Ambient Air Emissions: NSWC Crane has a Title V Permit. The potential to emit (PTE) for organic compounds was calculated for the remediation activities (waters and sediments). This PTE was then compared to regulatory thresholds for determination of air permitting and potential treatment requirements for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). The methodology for making these determinations and conclusions were provided to the NSWC Crane Air Permitting Specialist. The Air Permitting Specialist reviewed and approved the methodology and conclusions. It was concluded that permitting and treatment requirements were not applicable because the PTE for organic compounds qualified for exemption from air permitting and treatment requirements.

That makes sense, since the volume of water is relatively small and the air emissions would be very short term.

Wastewater Discharges to NPDES Plant: The NSWC Crane WWTP is an NPDES-permitted facility. The NPDES permit contains limits for various contaminants, including organics. Information regarding the potential organic concentrations of pond and sediment waters, which would be discharged to the WWTP, was submitted to the NSWC Crane NPDES Permit Manager. The NPDES Permit Manager reviewed the information and determined that treatment of organics was necessary to reduce organic concentrations. As a result the air stripper was added to the treatment train. The NPDES Permit Manager determined that lead in the air stripper effluent would be the controlling factor for determining the loading from the remediation activities to the WWTP.

Storm Water Runoff: The Erosion and Sedimentation Control Plan describes requirements for control of storm water runoff. This Plan was developed in accordance with IDEM requirements and guidance for erosion and sedimentation control plans.

The area to be disturbed at this site may be too small to require a Stormwater Pollution Prevention Plan, and in any case I've found that the measures we routinely use in remediation projects meet the SWPPP standards in most cases.

No changes have been made to the SWMU 8 IMWP in response to this comment.

Section 3.1 states that 423 yards of soil will be removed, and 482 yards needed for backfill. The location will be revegetated except below the normal water surface of the pond. Does there need to be a pond at that location? (i.e. does DNR or IDEM's Office of Water require you to recreate the pond?) A pond focuses water flow through any residual contaminated soil and down through the bedrock conduits that have residual contamination. If we don't need to keep the pond it might be better to backfill the excavation and slope it to encourage precipitation to run off.

Restoration of the pond was included in the SWMU 8 IMWP at the request of the NSWC Crane Natural Resources Manager. He noted the following in an e-mail dated April 7, 2006.

"As far as I can tell, the nearest permanent water source to the B-106 pond is Boggs Creek. So, if it makes sense from an environmental standpoint, I would like to maintain the pond as a wildlife waterhole after the remediation if possible. Thanks.

Steve

Steve Andrews, Natural Resources Manager"

The pond will result in a slightly increased recharge of groundwater. However, this additional recharge is expected to be relatively insignificant when compared to the total recharge area. The pond will be excavated to bedrock and clean fill will be used to replace the excavated sediment. Therefore, any water infiltrating through the pond bottom into the bedrock will be clean. Based on the information collected during the RFI, the residual contamination in the surrounding soils is expected to be low. Any focusing of the water flow would also be relatively small. This focusing would occur only in the areas where contamination has occurred and would flush out residual contamination in bedrock conduits. However, this impact should be balanced against the beneficial ecological impact resulting from maintaining the B-106 pond as a wildlife waterhole.

I asked about DNR because I suspected there might be wetlands concerns. If this is the only nearby source Steve Andrews is right, and I agree that the potential releases would be far too small in comparison to the benefit.

No changes have been made to the SWMU 8 IMWP in response to this comment.

P 3-7 says verification samples will be collected, but doesn't say how many or where. Section 5-2 says every 900 sq ft of floor and every 900 sq ft of wall. I will withhold judgment until I see how many feet there will be between sidewall samples. Section 5-3 says the specifics will be sent as an addendum.

The Navy is in the process of preparing an Addendum to the QAPP that was used for the RF investigation at NSWC Crane SWMUs 8 and 15. This Addendum will contain the detailed description of the confirmation sampling program including sampling procedures, collection of sample aliquots within the excavation area for field testing and fixed laboratory confirmation for SWMU 8.

It should be noted that the actual square footage per sample as stated in the QAPP will be less than 900 square feet per sample. Also, assuming that soils and sediment are excavated to bedrock, it may not be possible to collect any samples from the excavation floor.

The draft QAPP Addendum will be provided to IDEM for review in late June 2006.

I understand that there may not be many bottom samples, which is why I mentioned sidewall samples. It is highly unlikely that we would have a problem agreeing on the number of samples. Bill, I won't be back until late June, so don't hold up this project waiting for me to approve the sampling plan.

No change was made to the SWMU 8 IMWP to address this comment.

Other comments:

Section 2.3.3 Ecological Risks

This workplan addresses the soil and sediment removal in the pond and is not specifically related to risk assessment, but since the plan references the previous risk assessment work it must be pointed out that in the review of the previous work IDEM did not address the deficiencies in the risk assessments because it was clear that removal was required. Apparently not commenting on the risk assessments was taken as acceptance. Both human health and ecological risk assessments for this site are incomplete:

- COPCs cannot be removed from consideration because the concentrations are lower than upgradient sites, since the upgradient sites at Crane are still part of the facility. If upgradient sites

have higher concentrations then the scope of the investigation and potential remediation must be changed.

- COPCs cannot be removed from consideration because they did not come from the unit being investigated. Contamination must be addressed regardless of the source.

- Aquatic toxicity methods that evaluate acute toxicity are not acceptable unless you can demonstrate a very short term exposure. Toxicity methods must evaluate chronic effects.

The Navy concurs that this IMWP addresses an interim removal action and is not intended to address the risk assessment process. The information, which was obtained from the internal draft version of the RFI Report, was provided only to supply background information. It is understood that IDEM has not had the opportunity to review the SWMU 8 RFI report including the health and ecological risk assessments

No change was made to the SWMU 8 IMWP to address this comment.

5090

Ser PRCR4/6199

30 June 2006

The letter Ser PRCR4/6199 was for the
submittal of the Final Interim Measure Work
Plan (IMWP) for B106 Pond SWMU 08/17. This
report updates the draft report dated
6/5/06 making it the final report.