



DEPARTMENT OF THE NAVY
CRANE DIVISION
NAVAL SURFACE WARFARE CENTER
300 HIGHWAY 361
CRANE INDIANA 47522-5001

N00164.AR.001133
NSWC CRANE
5090.3a

IN REPLY REFER TO:

5090/S4.7.3
Ser PRCR4/7333
30 OCT 2007

Indiana Department Of Environmental Management
Office of Land Quality
Industrial Waste Compliance Section
Attn: Mr. Dave Berrey
100 North Senate Ave.
Indianapolis, IN 46204-2251

Dear Mr. Berrey:

Crane Division, Naval Surface Warfare Center (NSWC Crane) is preparing to conduct a voluntary interim measures removal of pesticide contaminated soils at Solid Waste Management Unit (SWMU) 9 (Pesticide Control Area). As such, NSWC Crane requests a contained-in determination for the SWMU 9 pesticide contaminated soils.

Enclosure (1) is a figure showing the area of excavation. Enclosure (2) contains the analytical data sheets for the excavation area. Enclosure (3) is the contained-in determination checklist.

Five samples clearly exceed the IDEM RISC industrial soil direct contact values. These samples are: 09SB018, 09SB026, 09SB046, 09SB067, & 09SB070. As such, the soils from these locations will be handled separately.

An additional 65 samples at various depths were collected from 23 sample locations and analyzed for herbicides. Of the 65, 44 were collocated with 17 of the pesticide samples within the area of excavation (samples 09SB090 - 09SB93 and 09SB095 - 09SB107). Analysis was conducted for four herbicides for a total of 260 analyses. All four herbicides were detected but at low levels and only in five of the samples. Within the area of excavation, three herbicides were detected at three different sample locations. Since herbicide contamination is not significant, the herbicide data is not presented and herbicides are not a concern for this interim measure.

Please review the information provided and let us know if you need any additional information or have any further questions.

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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 Mgr

By direction of the Commanding Officer

Enclosures: 1. SWMU 9 Sample Location and Excavation Figure
2. Pesticide Analytical Data Sheets
3. Contained-In Determination Checklist

Copy to:

ADMINISTRATIVE RECORD

NAVFAC MW (Howard Hickey) (w/o encl)

USEPA (Pete Ramanauskas) (w/o encl)

IDEM (Doug Griffin) (w/o encl)

NWRS (Todd Carmichael) (w/o encl)

TTNUS (Ralph Basinski) (w/o encl)



LEGEND

- Soil Boring
- Soil Excavation Node (Surface and Subsurface)
- Soil Boring (Surface Excavation Required)
- Soil Boring (Surface and Subsurface Excavation Required)
- Monitoring Well
- Surface Soil Excavation (0 to 2 Feet BGS)
- Subsurface Soil Excavation (2 to 6 Feet BGS)
- ▭ Building
- Steam Line
- Steam Line Requiring Support System
- ▭ Former Building
- Road
- Railroad
- Tree Line
- Stream
- Topographic Contour

CONTRACT NO. CTD 00042		DATE	
APPROVED BY		DATE	
APPROVED BY		DATE	
DRAWING NO. FIGURE 3-1		REV 0	
FORMER BUILDING 55 AND BUILDING 150 EXCAVATION AREA SWM 9 CAPP ADDENDUM NO. 4 NSWC CRANE CRANE, INDIANA			
DRAWN BY S. STROZ		DATE 3/28/07	
CHECKED BY T. SMITH		DATE 10/18/07	
CUSTODIAN AREA		SCALE	
AS NOTED			



TABLE 1
CROSS REFERENCE SHEET FOR SAMPLE LOCATION NUMBER AND SAMPLE DATA GROUP NUMBER
NAVAL WARFARE CENTER CRANE
CRANE, INDIANA

Sample Location Number	Sample Data Group Number
09SB018	37604
	37603
	37601
09SB019	37603
	37604
	37603
09SB020	37603
	37603
	37604
09SB021	37604
	37603
	37603
09SB022	37603
	37604
	37603
09SB023/TW004	37607
	37603
	37603
	37604
09SB024/TW006	37607
	37604
	37603
	37603
09SB025	37603
	37604
	37603
09SB026	37603
	37603
	37604
09SB027/TW005	37607
	37604
	37603
	37603
09SB030	37604
	37606
	37606
09SB031/TW002	37602
	37605
	37605
09SB032	37605
	37605
	37605
09SB033	37606
	37606
	37606

Sample Location Number	Sample Data Group Number
09SB034	37605
	37605
	37605
09SB035	37605
	37605
	37605
09SB040	37611
09SB042	37618
	37618
	37618
09SB046	37618
	37618
	37618
	37617
09SB047	37615
	37614
	37614
	37615
09SB051	37614
	37614
	37614
	37612_15
	37615
09SB055	37614
	37615
	37615
	37612_15
	37615
09SB066	TTC09
	TTC09
	TTC09
	TTC10
09SB067	TTC09
	TTC09
	TTC09
	TTC10
09SB068	TTC10
	TTC11
09SB069	TTC10
	TTC10
	TTC11
09SB070	TTC10
	TTC10
	TTC11
09SB082	TTC12

Information Checklist for Contained-In Request

1. Name of responsible party (property owner/operator).
Naval Surface Warfare Center Crane, Crane Indiana
2. Site description (Name, Address, Size of Site, Number of Areas Involved). Please provide any site ID# such as EPA ID#, VRP number, etc.
**Solid Waste Management Unit 09 (Building 55 Pesticide Control Area)
RCRA Permit ID #: IN5170023498**
3. Is the site subject to RCRA corrective action, enforcement orders?
RCRA corrective action site
4. Is the site being remediated under state or federal oversight? Identify Agency and Agency contacts.
The U.S. EPA, Region V is the lead agency on this project. Mr. Peter Ramanauskas (312-886-7890) is the U.S. EPA point of contact.
5. How was the site contaminated? (Spill of hazardous waste, product release, process waste release, other?)
The former Building 55 was a heavy equipment garage that also housed the Pest Control functions. At the edge of the paved lot west of B55 was a vehicle wash rack that sat atop an embankment. Presumably, following application, pesticide containers, sprayers, and/or applicators were rinsed on this wash rack. This resulted in pesticide contamination of ~9,000 square feet of soil.
6. When was the site contaminated?
Unknown. Pesticide operations may have been located in B55 from the early 1950s to early 1970s.
7. What EPA waste codes apply and why? Indicate all listed and characteristics codes applicable to the material which contaminated the site.
Based upon RCRA Facility Investigation (RFI) samples taken from 2005 to 2007, the following listed waste codes apply: U060, U061, U036, U247, P004, P037, P050, and P059. The following characteristic waste codes may apply to samples whose total results exceed 20 times the respective TCLP concentration: D020 and D031. NOTE, five samples exceed the IDEM RISC Industrial Direct Soil Contact values (09SB018, 09SB026, 09SB046, 09SB067, & 09SB070) and are excluded from this request, since the areas from those samples will be handled separately. Since sample 09SB018 is the only sample that potentially exceeds the D031 TCLP limit, and since 09SB018 is not eligible for a Contained-In determination, D031 is not applicable to the scope of this request.
8. Does the media exhibit any characteristics of hazardous waste, in addition to being contaminated with a listed waste? If it does, the media would be subject to

hazardous waste rules regardless of listed waste concentration. Media cannot exit hazardous waste system unless treated to remove the characteristics.

See response above. Samples for TCLP analyses will be run on the in-situ samples prior to disposal. All wastes will be handled accordingly.

9. Which specific hazardous substances/constituents are present based on analytical results? Be sure to include breakdown products of the listed waste.

The following pesticides were detected in the RFI samples: 4,4'-DDD; 4,4'-DDE; 4,4'-DDT; ALDRIN; ALPHA-BHC; ALPHA-CHLORDANE; BETA-BHC; DIELDRIN; ENDOSULFAN I; GAMMA-CHLORDANE; HEPTACHLOR; HEPTACHLOR EPOXIDE; METHOXYCHLOR.

10. What is the volume/quantity of media involved? An estimate of the volume/quantity will provide some idea of what size project we are dealing with.

The estimated quantity is 666 cubic yards of surface soil and 195 cubic yards of subsurface soil (including soils excavated to meet OSHA sloping requirements).

11. Will the media in question be generated one time only, as a batch or in a continuous manner?

This is a one time generation from the voluntary interim measures remediation of the site.

12. Is treatment of the media involved or necessary?

No. Material will be direct loaded for transportation and disposal.

13. Analytical results and test methods. Results must be based upon representative sampling.

Hard copy analytical results will be provided via mail. A spreadsheet summary of the results is included with this submittal as well as a figure of the sample locations.

14. A description of the sampling plan and methods used to assure representative sampling.

An intensive sampling program was conducted as part of the RFI for the B55 area, which consisted of four sampling events (March, May, and September/October 2005; and October 2006).

15. QA/QC documentaton should be provided. For most industrial default level determinations, we only need a statement that QA/QC procedures were followed and are available if requested. For residential default determinations complete QA/QC documentation must be provided with the request.

All QA/QC procedures were followed. QA/QC documentation is available upon request.

16. How will the material be managed at the generation site, intermediate sites, and final destination? What time periods are involved?

Material will be direct loaded into trucks for shipment. The waste will then be transported directly to the landfill for disposal.

17. What is the final destination of the contaminated media and how is it to be managed at the final destination site?

Non-characteristic wastes will be taken to Daviess County LF or Sycamore Ridge LF.

Wastes that fail TCLP analysis will be taken to EQ- Michigan Disposal, EQ-Detroit, Michigan or Clean Harbors Lambton, Ontario, Canada.

18. How will the company assure contained-in threshold levels are attained for media that will be generated on an ongoing basis?

NA