



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

N00164.AR.001192  
NSWC CRANE  
5090.3a

IN REPLY REFER TO:

5090/S4.7.3  
Ser 0592/9154  
21 JUL 2009

U.S. Environmental Protection Agency, Region V  
Waste, Pesticides, & Toxics Division  
Waste Management Branch  
Corrective Action Section LU-9J  
77 West Jackson Blvd.  
Chicago, IL 60604

Dear Mr. Ramanauskas:

Crane Division, Naval Surface Warfare Center submits for your review and comment, the Draft Uniform Federal Protocol - Sampling and Analysis Plan (UFP-SAP) for the Mine Fill A (MFA) Battery Dump Site (Solid Waste Management Unit 12). The UFP-SAP is provided as enclosure 1.

The Final MFA Battery Dump Site Interim Measures Work Plan is submitted for your review 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, PRCR43, at 812-854-6160, email thomas.brent@navy.mil.

Sincerely,

*J. M. Hunsicker*  
J. M. HUNSICKER

Environmental Protection Mgr  
By direction of the Commander

Enclosures: 1. Draft MFA Battery Dump Site UFP-SAP  
2. Final MFA Battery Dump Site IMWP  
3. Certification Statement

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

**RESPONSE TO MAY 18, 2009 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
(EPA) COMMENTS (E-MAIL FROM PETER RAMANAUSKAS)  
ON THE INTERIM MEASURES WORK PLAN (IMWP)  
FOR SWMU 12 – BATTERY DUMP SITE  
NAVAL SURFACE WARFARE CENTER  
CRANE, INDIANA**

Comments provided by the EPA are shown in bold font. Responses following each EPA comment are shown in regular font. Changes to the IMWP are italicized and enclosed in quotation marks.

**EPA Comment 1:**

**Table 2-2, Footnote 3: It appears that the numbers in the table identified as being IDEM Default Closure Levels for Migration to Groundwater are really the IDEM Direct Contact numbers. The footnote or the values in the table should be corrected as needed.**

Response to EPA Comment 1:

The numbers reported in the table are IDEM Direct Contact numbers, Footnote 3 has been revised to read as follows;

*"3 Human Health COC. Human Health Cleanup Goals indicate the lowest of calculated risk level for direct contact reported in the RFI (Oak Ridge National Laboratory Screening Level for Iron), the IDEM Direct Contact concentration, and the maximum background detection."*

**EPA Comment 2:**

**The tables presented on pages 3-4 and 3-5 contain footnotes indicating that certain volumes of removed soils may be expected to exhibit hazardous characteristics based on TCLP results. This seems to contradict the table on page 3-7 which labels the same volumes of soils as non-hazardous. Please clarify and provide some additional information on how the Navy will verify the boundaries and volumes of hazardous soils and ensure such soils are kept segregated from non-hazardous soils upon removal.**

Response to EPA Comment 2:

The note that accompanies the tables on pages 3-4 and 3-5 is to indicate that the Contractor must verify the non-hazardous soil determination by running TCLP analysis on the excavated soil. Note 1 on both of these tables has been revised to read as follows;

*"1 Reported volume is expected to be non-hazardous, the EMAC Contractor must verify this through TCLP testing prior to offsite disposal."*

**EPA Comment 3:**

**Referring to Section 3.2.4, please provide some additional information on how the XRF screening will be done. If the procedures are identical to a previously approved workplan, supplement this workplan with that information or reference the previously approved workplan/procedures and state how field crews will know to follow those procedures.**

Response to EPA Comment 3:

The procedures for analyzing the samples with XRF will be presented in the QAPP (see Response to EPA Comment 4 for information on the QAPP preparation). The text will be revised to reference the QAPP and to direct the sampler to follow the XRF procedures identified in the QAPP. The revised text for Section 3.2.4 has been revised as follows

## Change Page Directions

The following are directions for replacing pages in the Draft Final version of the NSW Crane SWMU 12 IMWP to create the Final version of the NSW Crane SWMU 12 IMWP.

- 1) Remove old cover and spine dated April 2009 and replace with new cover and spine dated July 2009.
- 2) Remove old signature page dated April 2009 and replace with new signature page dated July 2009.
- 3) Remove old table of contents and acronyms and replace with new table of contents and acronyms.
- 4) Remove Table 2-2 page 11 of 12 and 12 of 12, Table 2-3, and Table 2-4 and replace with new Table 2-2 page 11 of 12 and 12 of 12, Table 2-3, and 2-4.
- 5) Remove old Section 3 text (do not remove tables), and replace with new Section 3 text.
- 6) Remove old Figure 3-1 and replace with new Figure 3-1.
- 7) Remove old Section 5 text, and replace with new Section 5 text.

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Ser 0592/9154

21 July 2009

The letter SER 0592/9154 dated 7/21/09 was for the submittal of the response to EPA comments and change pages for the Draft MFA Battery Dump Site UFP-SAP and the Final MFA Battery Dump Site IWMP. The change pages were added to the draft report dated 4/8/09 making it the final report.