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TRANSMITTAL EMAIL AND U S NAVY RESPONSES TO INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT COMMENTS ON THE SAMPLING AND ANALYSIS PLAN
FOR A THIRD ROUND OF DELINEATION SAMPLING AT SOLID WASTE MANAGEMENT
UNIT 21 NSA CRANE IN
2/27/2014
NAVFAC MIDWEST

Lyons, Karen

From: Brent, Thomas CIV NAVFAC MW, PWD Crane EV <thomas.brent@navy.mil>
Sent: Thursday, February 27, 2014 9:43 AM
To: dgriffin@idem.in.gov
Cc: Hickey, Howard M CIV NAVFAC MW EV; Basinski, Ralph; Lyons, Karen; Barringer, Rick
Subject: FW: SWMU 21 Sampling Plan (RESPONSE TO IDEM COMMENTS)
Attachments: SWMU 21 RTCs and Navy Observations.docx

Doug,

Thanks for the questions/comments. For ease of reading (and since the Navy email system is text only), I'm providing our responses in the attached Word document.

-Tom

-----Original Message-----

From: GRIFFIN, DOUG [<mailto:DGRIFFIN@idem.IN.gov>]
Sent: Wednesday, February 26, 2014 3:14 PM
To: Brent, Thomas CIV NAVFAC MW, PWD Crane EV
Cc: Hickey, Howard M CIV NAVFAC MW EV; Basinski, Ralph; Lyons, Karen
Subject: RE: SWMU 21 Sampling Plan

Tom,

I have no concerns or comments relative to the sample locations for the constituents. Just two peripheral comments:

I am NOT a TSCA expert, but I thought the 25ppm concentration was for industrial 'low occupancy' areas...that may not be correct but you should probably verify it.

The plan is to have a professional surveyor log the sampling points. Hand held GPS units exist that are pretty accurate for X and Y coordinates (we have found survey grade equipment is needed for elevation).

-----Original Message-----

From: Brent, Thomas CIV NAVFAC MW, PWD Crane EV [<mailto:thomas.brent@navy.mil>]
Sent: Friday, February 14, 2014 7:23 AM
To: GRIFFIN, DOUG
Cc: Hickey, Howard M CIV NAVFAC MW EV; Basinski, Ralph; Lyons, Karen
Subject: FW: SWMU 21 Sampling Plan

Doug,

Attached is the Sampling and Analysis Plan for a third round of additional delineation sampling at SWMU 21, the DRMO Scrap Yard. Since this is a continuation of a field effort begun under the August 2010 SWMU 21 SAP and the March 2011 SWMU 21 SAP Addendum, I'm submitting this via email only. If you think a hard copy with an official Navy letter is required, let me know and I'll get one out. Please review and let us know if you have any comments or questions.

Thanks,
Tom

IDEM COMMENT: I am NOT a TSCA expert, but I thought the 25ppm concentration was for industrial 'low occupancy' areas...that may not be correct but you should probably verify it.

NAVY RESPONSE: We're not TSCA experts either, but it's our understanding or interpretation that 761.61 is applicable:

§761.61 PCB remediation waste.

This section provides cleanup and disposal options for PCB remediation waste. Any person cleaning up and disposing of PCBs managed under this section shall do so based on the concentration at which the PCBs are found. This section does not prohibit any person from implementing temporary emergency measures to prevent, treat, or contain further releases or mitigate migration to the environment of PCBs or PCB remediation waste.

(a) *Self-implementing on-site cleanup and disposal of PCB remediation waste.*

(4) *Cleanup levels.* For purposes of cleaning, decontaminating, or removing PCB remediation waste under this section, there are four general waste categories: bulk PCB remediation waste, non-porous surfaces, porous surfaces, and liquids. Cleanup levels are based on the kind of material and the potential exposure to PCBs left after cleanup is completed.

(i) *Bulk PCB remediation waste.* Bulk PCB remediation waste includes, but is not limited to, the following non-liquid PCB remediation waste: soil, sediments, dredged materials, muds, PCB sewage sludge, and industrial sludge.

(A) *High occupancy areas.* The cleanup level for bulk PCB remediation waste in high occupancy areas is ≤ 1 ppm without further conditions. High occupancy areas where bulk PCB remediation waste remains at concentrations >1 ppm and ≤ 10 ppm shall be covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section.

(B) *Low occupancy areas.* (1) The cleanup level for bulk PCB remediation waste in low occupancy areas is ≤ 25 ppm unless otherwise specified in this paragraph.

High and Low Occupancy areas are defined under 761.3.

The 25 ppm PCB concentration applies only within the DRMO which is fenced and is not accessible to the public. The 1 ppm PCB standard does not apply to the fenced area of the DRMO.

IDEM COMMENT: The plan is to have a professional surveyor log the sampling points. Hand held GPS units exist that are pretty accurate for X and Y coordinates (we have found survey grade equipment is needed for elevation).

NAVY RESPONSE: We have found hand held GPS units to be fairly accurate for X and Y coordinates when proper techniques are followed. However, the basic error in hand-held units is higher than encountered in surveys by licensed surveyors. In the case of SWMU 21, it is anticipated that hot spot removal actions will be required and it will be necessary to lay out excavation nodes. Locations coordinates will be determined during sampling. These locations will be used to define excavation nodes.

The excavation nodes will be reacquired and marked shortly before remediation actually occurs. While hand-held GPS units are used for initial marking of sample locations, we generally rely on land survey data to develop and reacquire excavation nodes due to the higher accuracy required for hot-spot removals.