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EMAIL AND THE ATTACHED U S NAVY RESPONSE TO THE U S EPA REGION V
COMMENTS ON THE INTERIM MEASURES REPORT SOLID WASTE MANAGEMENT UNIT 5
(SWMU 5) OLD BURN PIT NSA CRANE IN
04/30/2015
NAVFAC MID ATLANTIC

Cohen, Deborah

From: Brent, Thomas CIV NAVFAC MIDLANT, PWD Crane <thomas.brent@navy.mil>
Sent: Thursday, April 30, 2015 3:46 PM
To: Ramanauskas, Peter
Cc: Cole, Linda L CIV NAVFAC MIDLANT, IPTNE; Cohen, Deborah; Lyons, Karen; Basinski, Ralph; Bernhardt, Aaron
Subject: SWMU 5 IMR FINAL RESPONSE TO COMMENTS
Attachments: SWMU 5 Revised RTC_IMR_043015.docx
Signed By: thomas.brent@navy.mil

Pete,

Attached are the responses to your comments, hopefully resolving the remaining outstanding issues. If you still have concerns, let's get another call together to discuss. We're eager to get moving forward so we can get the remedy in place.

Thanks,
Tom

**RESPONSE TO EPA COMMENTS ON INTERIM MEASURES REPORT
SWMU 5 – OLD BURN PIT
NSA CRANE, CRANE, INDIANA**

There are two outstanding United States Environmental Protection Agency (EPA) concerns for the Solid Waste Management Unit (SWMU) 5 Final Interim Measures Report (IMR), dated March 2014, that need to be resolved. These concerns consist of (1) ecological risks associated with residual lead concentrations in the lead hot spot excavation area and (2) residual contaminant concentrations associated with areas where hazardous waste paint waste drums were removed during interim measures (IMs). These concerns also impact the Draft Final Corrective Measures Proposal (CMP), revisions dated April 2014.

Part 1 of this submittal provides revised Navy responses to EPA comments on the Draft Final IMR; original Navy responses to the comments were submitted to the EPA on 03/10/14. Ecological concerns associated with residual lead concentrations at SWMU 5 were reiterated in EPA comments in an email dated November 26, 2014 on the Draft Final CMP (Part 2 of this submittal). Therefore, the Navy chose to revise the original responses to the comments on the Draft Final IMR to clarify the Navy's position and resolve the EPA's concerns so that the site could move forward.

PART 1: REVISED RESPONSES TO COMMENTS ON FINAL IMR

02/24/14 Email from Peter Ramanaukas (EPA Region 5) to Tom Brent (NSA Crane)

1. EPA Comment: I am OK if you wish to finalize the draft Interim Measures Report (let me know if you need more than this email as an approval of the IMR), but the Navy will need to address elevated lead found during post excavation sampling. Explain how remaining elevated lead levels found during the post-excavation sampling will alter the conclusions of the risk assessments conducted for SWMU 5. Please include an explanation of whether the Navy believes lead bounding in soils for this area is adequate to address site risks.

Navy Response: The Navy believes the delineation of lead concentrations in soils completed using x-ray fluorescence (XRF) and fixed-base lab results during Interim Measures (IMs) is adequate for the following reasons:

- a) The Navy acknowledges that the elevated lead concentrations in the non-constructible area of SWMU 5 have not been bounded by "clean" samples and the maximum extent of lead contamination is not known. However, due to the nature of the deposition of buried debris at the site, the lead contamination is definitely spotty and therefore nearly impossible to determine, even with extensive sampling.
- b) The objective of the IM was to conduct an aesthetic-based surface debris cleanup and limited hotspot removal to minimize disruption of the ecological community. The complete removal of all lead concentrations above the media cleanup standard (MCS) was not a goal of the IM.
- c) An overall site management decision has been made to deal with the unacceptable risks in the non-constructible area by implementing land use controls (LUCs) because it is considered to be too costly to try to remove all buried debris throughout the area. The multi-site RFI identified potentially unacceptable human health residential risk to all media and construction worker risk to soil at SWMU 5 and potentially unacceptable risk to ecological receptors. The RFI recommended proceeding to a Corrective Measures Study (CMS). The implementation of LUCs was included in the remedial alternatives identified in the CMP.

LUCs would be used to restrict access and exposure to residual debris/contamination. The Navy would be responsible for implementing, maintaining, reporting on, and enforcing the LUCs. It is anticipated that periodic (e.g., annual) field inspections would be conducted to determine whether the current land use remains protective and consistent with all LUC objectives. If any land use or site conditions changed such that the buried material could be exposed or contaminated subsurface soil could be brought to the surface, the Navy would take immediate action to correct the issues. Also, additional evaluations of the protectiveness of the remedy would be documented as part of the 7-year review process established at NSA Crane.

- d) While there is potential risk to ecological receptors, the contaminated area is but a small part of a much larger contiguous forested ecological habitat and does not warrant a remedial action and, therefore, does not warrant a remedial action. As per OSWER Directive 9285.7-28P, remedial actions should not be designed to protect organisms on an individual basis (with the exception of certain protected species) but to protect local populations and communities. The elevated lead concentrations do not appear to be significantly impacting the plant/invertebrate community at SWMU 5, as evidenced by aerial photographs included in the IM Report.

The conclusions of the risk assessments described in the SWMU 5 CMP do not need to be altered based on the aforementioned information. However, this information will be added to the CMP, where appropriate, when the document is finalized.

The following text has already been added at the end of Section 2.4 of the SWMU 5 Final IMR to address the comment. Therefore, no additional revisions will be made to the Final IMR.

"It is possible that some individual plants and/or invertebrates are being impacted at locations where lead concentrations in soil are elevated because lead concentrations exceed plant and invertebrate screening levels. Also, small mammals and birds with small home ranges could be impacted from the lead in the soil. However, as discussed in OSWER Directive 9285.7-28P, Issuance of Final Guidance: Ecological Risk Assessment and Risk Management Principles for Superfund Sites, remedial actions generally should not be designed to protect organisms on an individual basis (with the exception of certain protected species) but to protect local populations and communities of biota (1999).

SWMU 5 comprises a small percentage of the contiguous forested area (less than 5 percent) (see Figure 2). Based on observations during site visits and the apparent similarity between the forested area at and surrounding SWMU 5 (as seen in Figure 2), it does not appear that local populations of plants/invertebrates and/or the plant/invertebrate community are being significantly impacted by metals at SWMU 5. Also, even if there are subtle impacts to ecological receptors from chemicals in surface soil at the site, these impacts would be localized to the areas where lead concentrations are elevated. Although the lead concentrations in the post-excavation samples were still greater than ecological screening levels, because the site comprises only a small portion of the overall habitat for ecological receptors in this area, any localized impacts to ecological receptors (including wildlife) at SWMU 5 will not impact the overall ecology in this area of NSA Crane."

2. EPA Comment: Also, note that as part of the CMIP, I'd want you to collect some verification soil samples in the hazardous paint waste removal areas to determine residual levels of COCs.

Navy Response: The Navy's original response dated 03/10/14 indicated that surface soil sampling for metals analysis would be conducted in the hazardous paint waste removal area and that the results of the sampling would be included in the CMIP. However, after a thorough review of the IM activities, the Navy does not believe that soil sampling is needed in this area of the site for the following reasons:

- **The project team's goal of conducting an aesthetic-based removal of surface debris present in the non-constructible area of the site was accomplished during IMs.** While conducting IMs, the Navy found six 5-gallon pails, two 55-gallon drums, and one 35-gallon drum of dried paint waste; some of the containers were rotted and rusted. No liquid paint waste was found; only dried paint waste was encountered. The colored solid paint waste was sampled and determined to contain elevated TCLP concentrations of chromium. The Navy removed paint waste found on the surface and containers that were partially buried. All colored paint waste and impacted soil were disposed of as a hazardous waste. Erosion control (hay, straw matting, coir logs) were used to stabilize the excavated areas and slope of the general area. Excavated areas were also seeded during restoration efforts.
- **Potential future risks from residual buried debris and soil contamination in the non-constructible area of the site can be adequately addressed via the implementation of land use controls (LUCs).** This acknowledgement was made by the project team during the IM planning process and was the reason why only a limited excavation and debris removal (surface only) was conducted. LUCs would be used to restrict access and exposure to residual debris/contamination. The Navy would be responsible for implementing, maintaining, reporting on, and enforcing the LUCs. It is anticipated that periodic (e.g., annual) field inspections would be conducted to determine whether the current land use remains protective and consistent with all LUC objectives. If any land use or site conditions changed such that the buried material could be exposed or contaminated subsurface soil could be brought to the surface, the Navy would take immediate action to correct the issues. Also, additional evaluations of the protectiveness of the remedy would be documented as part of the 7-year review process established at NSA Crane.

PART 2: RESPONSES TO EPA COMMENT DATED 03/24/15 ON IMR/CMP

03/25/14 Email from Peter Ramanauskas (EPA Region 5) to Tom Brent (NSA Crane)

EPA Comment: I received the Final SWMU 5 IMR and Response to Comments, thank you. For response #1, given the existing soil data collected at SWMU 5 (e.g. RFI), what is the estimate of the maximum extent (acreage) of potentially lead impacted soil which could affect ecological receptors?

Navy Response: The Navy believes that estimating the maximum extent of lead impacted soil which could affect ecological receptors is neither practical nor feasible due to the non-uniform/non-homogenous nature of the buried debris. To come up with a reasonable estimate, extensive additional sampling, which the Navy is not prepared to do, would be required and it's not clear that the benefit would outweigh the costs involved for the sampling effort.