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TRANSMITTAL LETTER REGARDING RESPONSES TO COMMENTS ON THE DRAFT
INTERIM MEASURES WORK PLAN UNEXPLODED ORDNANCE 7 (UXO 7) OLD RIFLE
RANGE AND TRAP RANGES NSA CRANE IN

6/28/2013
TETRA TECH



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PITT-06-13-056

June 28, 2013

Project No. 112G01621

Mr. Howard Hickey
NAVFAC MW
201 Decatur Avenue
Building 1A, Code EV
Great Lakes, Illinois 60088

Subject: CLEAN Contract N62472-03-D-0057
Contract Task Order No. F272

Reference: Responses to Comments on the Draft Interim Measures Work Plan for UXO 7 – Old Rifle Range and Trap Ranges (May 2013), Naval Support Activity Crane, Indiana

Dear Mr. Hickey:

Enclosed for your information is copy of Tetra Tech's responses to the review comments provided by Mr. Tom Brent, NSA Crane for the subject Draft Interim Measures Work Plan (IMWP) for UXO 7 at Naval Support Activity (NSA) Crane, Indiana. An e-mail message with the electronic files for the responses to comments document and the proposed text changes for the UXO 7 IMWP was submitted to the Navy earlier today. Mr. Brent accepted the comment responses as submitted (via e-mail) and requested a printed copy of the responses via FedEx delivery. He also directed us to compile and reprint the revised UXO 7 IMWP for delivery to the Navy next week.

Please contact the undersigned at (412) 921-8524 (e-mail: rick.barringer@tetrattech.com) or Mr. Ralph Basinski (412) 921-8308 (e-mail: ralph.basinski@tetrattech.com) regarding any questions or comments.

Sincerely,

Richard A. Barringer
Task Order Manager

RAB/mlg
Enclosure

cc: Mr. Tom Brent, NSA Crane (letter and enclosure)
Mr. Ralph Basinski, Tetra Tech (letter and enclosure)
Mr. Rick Barringer, Tetra Tech (letter and enclosure)
Mr. John Trepanowski, Tetra Tech (letter)
File copy – CTO F272 (letter, hardcopy of enclosure, and CD)

**Responses to Navy Review Comments (dated 06/07/13) on
Draft UXO 7 IMWP
NSA Crane, Crane, Indiana**

Comments:

Tom Brent's comments (dated 06/07/13) on the draft UXO 7 IMWP are presented below in **bold font** and Tetra Tech's responses to those comments are presented below in regular font with any text changes presented in *italic font*:

SECTION 2.0 COMMENTS/RESPONSES

Comment TJB1 (Section 2.2.3 – West Trap Range): Note that the colors orange and yellow indicating depth switch meaning between Figures 2-7 and 2-8.

Response: Figure 2-7 has been updated so colored sample locations match those of Figure 2-8 (yellow for concentrations of 0.015 – 0.15 mg/kg and orange for concentrations of 0.15 – 1.5 mg/kg).

Comment TJB2 (Section 2.2.3 – Lead Risk Reduction and Mitigation in UXO 7 Former Old Rifle Range Soil): Clarify that this (192 mg/kg) is an eco-driven number.

Response: The Navy and the USEPA mutually agreed upon a lead media cleanup goal of 192 mg/kg as an acceptable ecological benchmark in soil at UXO 7.

To ensure the reader understands this to be an ecological benchmark concentration, the 1st sentence of the 7th paragraph in Section 2.2.3 – Lead Risk Reduction and Mitigation in UXO 7 Former Old Rifle Range Soil has been revised to now read:

“Per an e-mail from Mr. Peter Ramanauskas, dated June 24, 2011, the USEPA agreed upon a MCG of a concentration of 192 mg/kg as an acceptable ecological benchmark to be applied as a site-wide arithmetic average soil lead concentration in the surface soil (0 to 2 feet bgs) for UXO 7.”

Comment TJB3 (Section 2.2.3 – Northernmost Area of Northern Zone): Can we please use different terminology? Northernmost, Central, and Southernmost begin to get confusing with the zones.

Response: The terminology for the three areas within the Northern Zone of UXO 7 has been changed throughout the text, tables, and figures as follows:

- Northernmost Area changed to the “Drainage Area”
- Central Area changed to the “400-Yard Berm Area”
- Southernmost Area changed to the “Dirt Mound Area”

Comment TJB4 (Section 2.2.3 – Southernmost Area): State that since the mound was placed on plastic, samples collected through the plastic underneath the mound were clean.

Response: The following text has been added as new 4th and 5th sentences to the 2nd paragraph of Section 2.2.3 – Dirt Mound Area:

“To ensure the soil beneath the plastic sheeting was not contaminated, sample locations were placed around the perimeter of the dirt mound at the base and the samples were collected from the soil beneath the plastic layer on which the dirt mound is located. All samples collected from the soil underneath the plastic layer showed no signs of lead contamination.”

SECTION 3.0 COMMENTS/RESPONSES

Comment TJB1 (Section 3.2 – Soil Excavation/Removal): Since we will likely be proceeding with this cleanup “at risk” (i.e., prior to EPA approval), the excavation boundaries will definitely need to be re-evaluated. In other words, either connect clean-to-clean or explain why the excavation boundaries do not extend to known clean points.

Response: The proposed interim measures approach for UXO 7 is to excavate and remove “hot spot” pockets of soil with elevated concentrations of lead and PAH contamination in the former small arms range soil to mitigate risks to human or ecological receptors. A fence-line-to-fence-line or clean-to-clean remediation approach was not proposed for the soil at UXO 7. The elimination of peak “hot spot” concentrations was identified as an effective way to mitigate site risk and produce average site soil concentrations that demonstrate overall reductions in the lead and PAH contamination and produce more acceptable human and ecological exposure risks. Post-interim measures soils at UXO 7 may still contain residual areas with minor soil contamination in regards to lead and PAH concentrations, but the overall risks to site receptors will often be reduced by an order of magnitude or more, as described in the risk reduction and mitigation presentations in Section 2.2.3 of the IMWP. No changes are required to address this comment in the IMWP.

Comment TJB2 (Section 3.2 – Soil Excavation/Removal): It’s unclear why the following paragraphs on pp. 3-2 through 3-4 reference figures in Section 2. Please change to reference appropriate figures in Section 3.

Response: All of the figure references in Section 3.0 have been changed so they reference the correct figures in Section 3.0

Comment TJB3 (Section 3.2 – Northernmost Area of the UXO 7 Northern Zone): Again, this terminology (Northernmost, Central Area, and Southernmost) is potentially confusing. Please redo.

Response: The terminology has been changed. Please refer to the previous response for Comment TJB3 in Section 2.

Comment TJB4 (Section 3.2 – Central Area of the UXO 7 Northern Zone): Subareas CA-4 and CA-5 appear to be switched on Figure 3-2.

Response: Subareas CA-4 and CA-5 were indeed switched on Figure 3-2. This mistake has been corrected.

Note: All other deletions/insertions and grammar notations have been completed throughout the report (text, tables, and figures).