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U S NAVY RESPONSE TO U S EPA REGION V COMMENTS ON DRAFT INTERIM MEASURES REPORT SOLID WASTE MANAGEMENT UNIT 5 (SWMU 5) OLD BURN PIT NSA CRANE IN
2/24/2014
U S NAVY

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

02/24/14 Email from Peter Ramanauskas (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 conclusions of the risk assessments described in the SWMU 5 Corrective Measures Proposal would not be altered. The following text has been added at the end of Section 2.4 of the SWMU 5 Interim Measures Report.

   "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: Surface soils samples will be collected for metals analysis in the hazardous paint waste removal areas. The results will be described in the CMIP.