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EMAIL AND INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT COMMENTS
ON THE CORRECTIVE MEASURE STUDY REPORT FOR SOLID WASTE MANAGEMENT
UNIT 11 (SWMU 11) OLD STORAGE BUILDING B-225 NSA CRANE IN
04/21/2016
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Doug Griffin, IDEM
IDEM comments on the Corrective Measure Study Report for SWMU 11
Naval Support Activity Crane, Crane, Indiana
21 April 2016

Subject: RE: SWMU 11 CMS

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

From: GRIFFIN, DOUG [mailto:DGRIFFIN@idem.IN.gov]

Sent: Thursday, April 21, 2016 3:28 PM

To: Brent, Thomas CIV NAVFAC MIDLANT, PWD Crane; Cole, Linda L CIV NAVFAC MIDLANT, IPTNORTH

Subject: [Non-DoD Source] SWMU 11 CMS

I've reviewed the CMS for SWMU 11 and have the following comments:

-LTM to demonstrate MNA/plume stability is an acceptable approach. A CMIP should be developed with the specifics.

-The recommendation for LUC that restricts 'inhabitable' buildings needs to be adjusted. You do NOT need to modify the CMS, but the LUC Plan should follow Indiana's ERC approach. Rather than say you can't use the land for something the LUC plan should say you can't use it for these things unless you demonstrate safety. As an example if Crane wanted to build housing in this location the first thing you would have to do is remove the slab, which would make removal of the contaminated soil easy. Any building you put in that location for residential or commercial use should have a vapor mitigation system, which is fairly straightforward in new construction. When the building is in place and the HVAC system is operating you test the indoor air to demonstrate that your vapor mitigation system is working. This is the language in the generic ERC template:

(f) Shall not construct or allow occupancy of a dwelling or work space on the Real Estate unless a vapor mitigation system is installed, operated, and maintained within the dwelling or work space. IDEM may waive this restriction in writing if the Owner has provided data and analysis demonstrating to IDEM's satisfaction that there is no unacceptable risk to human health via the vapor intrusion exposure pathway.