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EMAIL AND THE U S NAVY RESPONSE TO 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
05/09/2016
NAVFAC MID ATLANTIC

Cohen, Deborah

From: Brent, Thomas CIV NAVFAC MIDLANT, PWD Crane <thomas.brent@navy.mil>
Sent: Monday, May 09, 2016 2:52 PM
To: GRIFFIN, DOUG
Cc: Cole, Linda L CIV NAVFAC MIDLANT, IPTNORTH; Cohen, Deborah
Subject: RE: SWMU 11 CMS
Attachments: RTC_IDEM_SWMU11_CMS Report_20160506.docx
Signed By: thomas.brent@navy.mil

Doug,

Please find the Navy's response to your comments in the attached. Once you let us know they're acceptable, we can send an update to finalize the SWMU 11 CMS.

Thanks,
Tom

-----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.

Response to IDEM Comment
Draft Final CMS Report for SWMU 11
NSA Crane, Indiana
May 6, 2016

Comment in Email Dated 4/21/2016 from Doug Griffin

Comment: 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:

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Response: Agreed. As described in the April 2016 Draft Final Corrective Measure Study (CMS) Report, details of long-term management (LTM) and land use controls (LUCs) would be provided in the Corrective Measure Implementation Plan (CMIP)/Quality Assurance Project Plan (QAPP), which would include the LUC Implementation Plan (LUCIP) and LTM Sampling and Analysis Plan (SAP). The Navy will prepare the CMIP/QAPP after the Statement of Basis is published and the Navy will ensure that that LUCIP will use similar language provided in the comment above.

Because no changes to the CMS Report are necessary based on these comments, the April 2016 version will be the final CMS Report and the Navy will update the cover page, signature page, and spine to indicate that it is the final version.