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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 MANAGMENT UNIT 16 (SWMU 16) CAST HIGH EXPLOSIVES FILL/  
BUILDING 146 INCINERATOR NSA CRANE IN  
05/09/2016  
NAVFAC MID ATLANTIC

## Cohen, Deborah

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**From:** Brent, Thomas CIV NAVFAC MIDLANT, PWD Crane <thomas.brent@navy.mil>  
**Sent:** Monday, May 09, 2016 2:55 PM  
**To:** GRIFFIN, DOUG  
**Cc:** Cole, Linda L CIV NAVFAC MIDLANT, IPTNORTH; Cohen, Deborah  
**Subject:** RE: SWMU 16 CMS  
**Attachments:** RTC\_IDEM\_SWMU16\_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 that you concur, we'll send an update to finalize the SWMU 16 CMS.

Thanks,  
Tom

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

**From:** GRIFFIN, DOUG [mailto:DGRIFFIN@idem.IN.gov]  
**Sent:** Friday, January 29, 2016 1:55 PM  
**To:** Brent, Thomas CIV NAVFAC MIDLANT, PWD Crane; Cole, Linda L CIV NAVFAC MIDLANT, IPTNORTH  
**Subject:** [Non-DoD Source] SWMU 16 CMS

The proposal to do LTM, VI, and LUC is appropriate for the site. You need to put together a workplan that specifies where the samples will be collected and what the standards will be (at what concentration do we take a closer look rather than waiting two years for the next samples).

The two VI samples the first year should be summer and winter samples with the building operating normally and the HVAC system running.

The annual inspection of the floors for cracks should explicitly tell the inspector to seal any cracks they find and document that the repairs are completed. I know that sounds obvious but I've found that people see the inspections as just a paperwork requirement to get out of the way and don't do anything about the problems they find.

**Response to IDEM Comment**  
**Draft Final CMS Report for SWMU 16**  
**NSA Crane, Indiana**  
**May 6, 2016**

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*Comment in Email Dated 1/29/2016 from Doug Griffin*

**Comment:** The proposal to do LTM, VI, and LUC is appropriate for the site. You need to put together a workplan that specifies where the samples will be collected and what the standards will be (at what concentration do we take a closer look rather than waiting two years for the next samples).

The two VI samples the first year should be summer and winter samples with the building operating normally and the HVAC system running.

The annual inspection of the floors for cracks should explicitly tell the inspector to seal any cracks they find and document that the repairs are completed. I know that sounds obvious but I've found that people see the inspections as just a paperwork requirement to get out of the way and don't do anything about the problems they find.

**Response:** The Navy agrees that a work plan would be prepared to specify the sampling requirements, frequency, and decisions for vapor intrusion (VI) sampling as part of the long-term management (LTM) component of the remedy. The requirements for inspection would also be provided in the work plan. As described in the January 2016 Draft Final Corrective Measure Study (CMS) Report, details of LTM and land use controls (LUCs) would be provided in a Corrective Measure Implementation Plan (CMIP)/Quality Assurance Project Plan (QAPP), which would include a LUC Implementation Plan (LUCIP) and LTM Sampling and Analysis Plan (SAP). The Navy will consider this comment and IDEM's VI guidance during development of the draft QAPP/CMIP, which will be provided to IDEM for review and comment.

Because no changes to the CMS Report are necessary based on these comments, the January 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.