

MAY 31 1991

5HR-13

CERTIFIED MAIL P 768 550 379
RETURN RECEIPT REQUESTED

Commander J. Hays
Public Works Officer
Building 2516
Naval Weapons Support Center
Crane, Indiana 47522

RE: Interim Measure Sampling
Old Burn Pit
Naval Weapons Support Center
Crane, Indiana
IN5 170 023 498

Dear Commander Hays:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the draft Interim Measure Sampling Report for the Old Burn Pit, Solid Waste Management Unit (SWMU) 05/03, dated November 19, 1990. The U.S. EPA hereby provides modifications of the draft report as follows:

1. It should be made clear in the report that the purpose of the sampling was to determine if the drums and debris could be removed, and their classification as a hazardous or a solid waste. Based on the available data for the unit, there appears to be no documentation to show that the waste was characteristic or not (by doing the TCLP and reactivity tests). The data shows that the waste is not characteristic, and may be handled as a solid waste. The management of the debris should be consistent with solid waste requirements.
2. Table 3.2 should explain what references were used for the regulatory limits.

3. It should be made clear to all contractors that the workplans have safety procedures that must be followed. The plan stated that safety glasses would be worn, and the female sampler from Engineering-Science was not wearing any glasses. Contractors must follow safety procedures or they should not be sampling.
4. Sample custody seals on the bottles and the cooler must be used. The Custody Transfer Record indicates that seals were not used. All the samples could be considered questionable based on the lack of custody seals. An explanation clarifying the integrity of the samples must be included.
5. An explanation must be given in the report as to why sample SS003-S was received by the lab three days after the sampling in a separate shipping package, without any chain-of-custody paperwork, and no explanation as to why it was not sent with the other samples. This sample result is questionable based on the lack of chain-of-custody and proper sample handling. An explanation clarifying the integrity of the samples must be included.
6. All chain-of-custody records must identify the SWMU being sampled.
7. Field notes from the sampling must be attached as an appendix to the report.
8. If samples are taken during the day, they should be shipped that night, if the crew is able to get to an overnight shipping service before it closes, instead of waiting until the next day. At the Old Burn Pit sampling, the samples were taken on Thursday 10/11 until 3:45 PM, and were not shipped until Friday 10/12 at 12:00 PM, and were received by the lab on Monday 10/15 at 10:00 AM.

A finalized sampling report, addressing these modifications, must be submitted to this office within 60 days of the date of this letter.

If you have any questions regarding this matter, please contact Ms. Carol Witt-Smith of my staff, at (312) 886-6146, for assistance.

Sincerely,

ORIGINAL SIGNED BY/
HAK K. CHO

Karl E. Bremer, Chief
RCRA Permitting Branch

cc: Tom Linson, IDEM
Hak Cho, RPB
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