



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUL 03 1995

HRP-8J

Mr. Tom Brent  
Department of the Navy  
Crane Division  
Naval Surface Warfare Center  
300 Highway 361  
Crane, Indiana 47522-5001

RE: Dye Burial Grounds  
Interim Measure Workplan  
Naval Surface Warfare Center  
Crane, Indiana  
IN5 170 023 498

Dear Mr. Brent:

The United States Environmental Protection Agency (U.S. EPA) has reviewed your final draft recommendations for remedial measures at the Dye Burial Ground Trenches, dated May 15, 1995. This Interim Measure describes the proposal for capping the trenches. We agree with the overall workplan and provide the attached additional comments that need to be addressed. Please respond to these comments and provide a final version of the Interim Measure Cap Workplan to the Agency within 45 days of the date of this letter.

We will try to make every effort to meet your request to streamline the reviews for the Interim Measure. With that in mind, the U.S. EPA hereby approves site preparation to begin. This includes specifically, the following construction phases (as identified on Page 15 of the workplan):

1. Conduct topographic survey.
2. Mark and remove all trees within the cap construction area identified.
3. Mow vegetation in the cap construction area.
4. Grade the cap area with fill (i.e., natural earthen material).

The rest of the construction phases may progress upon approval of the final revision. There are a few questions about drainage and design that we would like answered prior to the rest of the construction. (See attached comments). As specific design Construction Quality Assurance becomes available, please send the U.S. EPA and the State a copy for their files.

We are requesting that all trees within the construction area, be checked for Indiana bat nest locations prior to removal. If bat nests are found, the Navy should notify the U.S. EPA immediately in order to initiate consultation with the U.S. Fish and Wildlife Service. This step is a precautionary since the bat survey for the risk assessment in the general area has not been performed.

If you have any questions regarding this matter, please contact me at (312) 886-6146.

Sincerely,



Carol Witt-Smith  
Corrective Action Expert  
RCRA Permitting Branch, IN Section

cc: Tom Linson, IDEM  
Adrian Wilson, SOUTHDIV  
Mr. G. K. Hill, Deputy Director, Public Works Directorate, NSWC  
Brian Van Gutten, IDEM  
Chuck Maurice, RPB

Comments on the Interim Measures Cap for the Dye Burial Grounds  
Naval Surface Warfare Center  
Crane, Indiana  
IN5 170 023 498

1. Page 11, Plan and Profile View of the Proposed DBG Cover.
  - a. The diagram and the text do not match perfectly. The text is missing the filter on both sides of the biotic layer.
  - b. Specify the type of vegetative cover (i.e., grasses) that will be used.
2. Page 12, Cover Design  
Describe in the text and show on a map where the drainage will discharge, and how erosion at the discharge point will be minimized.
3. Page 13, Paragraph 4, Sentence 5  
Typographic error, "depends".
4. Page 16, Construction Sequence
  - a. Specific the sources of the construction materials, including the natural and synthetic materials.
  - b. The Construction Quality Assurance documentation must include photographs of the installation, and survey prints for each layer installed, to assure thickness, placements, overlapping, etc.
  - c. It is not recommended to have pipes wrapped adjacent to them with fabric material because of clogging. We recommend a change that a coarse natural material be used around the pipe and then the wrap the fabric, and have the pipe/gravel/fabric surrounded be the rest of the filter natural material in the trench.
  - d. What is the "sewer" pipe material?
  - e. Identify the type of seed that will be used.
  - f. 6 or 8 inch lifts should be used for the vegetation layer.
5. Page 17  
Include a short description on why all the materials should be compatible with the waste dyes.
6. Page 21, Performance Monitoring  
The second sentence in the ground water monitoring section does not read well. Are you recommending chemical or static water level readings or both? Please clarify.

7. Page 22, Appendix A
  - a. Clarify the difference between the Layer 5 pipe and the drainage pipe. I am assuming that the Layer 5 pipe is the drainage trench in the cap, and the sewer pipe goes to a discharge somewhere, that has not been identified clearly.
  - b. Make sure the estimates include a minimum 4 inch overlap for the fabric materials.
8. Will there be a coordinating health and safety plan and data management plan?
9. Long term monitoring beyond the one year time table will need to be addressed. See attached Corrective Action Monitoring Plan.

## CORRECTIVE ACTION MONITORING PLAN

### A. Performance Standard

The Corrective Action Monitoring Plan (CAMP) is designed to ensure that the Solid Waste Management Unit (SWMU) is maintained and controlled to minimize or eliminate threats to human health and the environment by preventing release of hazardous waste or hazardous constituents into the ground water beyond the SWMU's boundary. If there is evidence of spills or leaks, samples will be collected, evaluated, and analyzed if necessary, to determine the extent, if any, of contamination in the soil and/or in the ground water.

### B. Content of the CAMP

The CAMP shall include the following:

1. Cap (cover) Maintenance and Monitoring
  - a. A description of the design and construction of the cap of the SWMU;
  - b. A description of the long-term minimization of migration of liquids through the cap of the SWMU;
  - c. A description of maintenance procedures and schedules, to control and minimize erosion or failure of the cap of the SWMU;
  - d. A description of how settling and subsidence will affect the cap's integrity to prevent infiltration of rainfall or ground water into the SWMU;
  - e. A description of cap repair procedures; and
  - f. A description of procedures to prevent animals from burrowing into the cap, if applicable.
2. Run-on and Run-off Control Maintenance and Monitoring
  - a. A description of the design and construction of any run-on and run-off controls on or around the SWMU; and
  - b. A description of maintenance procedures and schedules, to control and minimize erosion or failure of any run-on and run-off controls on or around the SWMU.

3. Ground Water Monitoring and/or Collection System Maintenance and Monitoring

- a. A detailed description of the ground water monitoring system around the SWMU, or a system used to control a release from the SWMU, including procedures for sampling and analysis; and
- b. A description of maintenance procedures and schedules to control and minimize erosion or failure of any ground water monitoring system being used, or present, to monitor the SWMU, or to collect contaminated ground water.

4. Surveyed Bench Mark Maintenance

- a. A description of maintenance procedures and schedules, to control and minimize erosion or destruction of surveyed bench marks used to identify the location of the SWMU; and
- b. A surveyed map and legal description identifying the location of the SWMU and the bench mark.

5. Inspection Information

- a. The name, address, and phone number of the person or office to contact about the SWMU during the CAMP's monitoring timeframe; and
- b. Examples of any inspection logs concerning the SWMU.

6. Reporting Requirements

- a. The Permittee shall, at a minimum, report the following information to the Regional Administrator:
  - (1) A notice when repairs are necessary, including a description of the intended repair and a work schedule;
  - (2) A notice when the Permittee intend to do any construction within the SWMU area that may change the integrity of the cap or monitoring systems; and
  - (3) A report when a release has been found, including leachate seeps and releases into the ground water or soil, and the planned corrective actions to contain and/or clean up the release.
- b. The Permittee shall maintain at the facility all inspection records for the SWMU, for a period of at least 3 years from the date of the inspection. Any inspection report shall be made available to the U.S. EPA upon request.