



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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December 4, 2000

Mr. Jim Hunsicker  
Director, Environmental Protection Department  
Department of the Navy, Crane Division  
Naval Surface Warfare Center  
300 HWY. 361  
Crane, Indiana 47522-5000

Dear Mr. Hunsicker:

Re: Revised Modified Closure Plan  
ABG Surface Impoundments  
Notice of Deficiency  
Crane Surface Warfare Center  
Crane, Indiana  
IN5170023498

The Indiana Department of Environmental Management (IDEM) has received the revised modified closure plan for Crane, dated June 2000. The closure plan has been reviewed for technical adequacy and determined to be inadequate pursuant to 329 IAC 3.1.

The enclosed Notice of Deficiency (NOD) outlines the specific deficiencies and provides discussion relevant to the revision. The information requested by the NOD must be submitted, in full, as a modified closure plan. This is required before the closure plan may be considered technically adequate.

The modified closure plan must be received by this office within thirty (30) days of receipt of this notice. Each page of your submission must be uniquely numbered and must have the date of the submission. If the revised plan is inadequate, this office may modify your plan in accordance with 40 CFR 265.112(d)(4).

Please submit four (4) copies of the revised closure plan to the IDEM at the address above. A certification statement identical to the one stated in 40 CFR 270.11 must accompany all submissions.

If you have any questions regarding this matter, please call (800) 451-6027, press 0, and ask for Mr. Jeff Workman at extension 2-3221, or call 317/232-3221.

Sincerely,

Victor P. Windle, Chief  
Hazardous Waste Permit Section  
Permits Branch  
Office of Land Quality

Enclosure

cc: IDEM Southwest Regional Office (with enclosure)  
Mr. Craig Barker, IDEM (with enclosure)  
Mr. Marty Harmless, IDEM (with enclosure)

Notice of Deficiency  
Revised Modified Closure Plan  
ABG Surface Impoundments  
Crane Surface Warfare Center  
Crane, Indiana  
IN5170023498

The revised Modified Closure Plan for Surface Impoundments located within the Ammunition Burning Grounds (ABG), dated June 2000, for Crane Naval Surface Warfare Center has been reviewed and found deficient. All comments are listed below.

**Section III. Description of Waste Units to be Closed.**

1. This section must be revised to indicate that ground water contamination will be addressed through Permit Condition IV of the Subpart X (Miscellaneous Unit) permit issued by Environmental Protection Agency, Region 5 (effective January 13, 2000).

**Section IX. Decontamination of Tanks, Equipment, and Structures.**

2. Correct the statement in Part A "Background sampling has been completed for portions of the area surrounding the surface impoundments. ." Background values for metals were incorrectly calculated from only one boring. The February 8, 2000 Notice of Deficiency (NOD) notes that this is not acceptable. If cleanup levels for metals will be determined by background values, the correct procedure for calculating background values must be used. The correct procedure is described in Section X.B.I.{c} of the plan.

**Section XII. Cleanup Levels.**

3. A specific statement indicating the cleanup levels for metals or how they will be determined must be included in this section. Crane indicates in their NOD response that cleanup levels have been removed from the closure plan "to allow flexibility if acceptable levels should change between the plan approval and actual work beginning under Corrective Action." Corrective Action is likely to use the same strategy to set cleanup levels as a closure plan (i.e., either background or a Risk Integrated System of Closure (RISC) based level). If Corrective Action uses a different strategy (e.g. a site specific RISC closure level) the Closure Plan may still be amended to use that value. The Closure Plan must state the cleanup levels. However, the statement may be conditional (e.g., closure levels for metals may be based on background or RISC default closure levels, whichever is higher).
  4. There are no RISC closure levels for the explosive compounds and background does not apply. The facility may either propose closure levels from an acceptable source, indicate that a risk assessment will be performed, or indicate that they will use Corrective Action closure values being developed for explosive compounds at military facilities statewide. Crane may use the ground water compliance monitoring values established in the Subpart X permit to calculate appropriate closure levels for explosive compounds contained in the soil.
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