

Brent Thomas J CNIN:

From: Ramanauskas.Peter@epamail.epa.gov
Sent: Wednesday, January 23, 2002 10:40 AM
To: Brent Thomas J CNIN
Cc: clarkr@ttnus.com; GatesWH@EFDSOUTH.NAVFAC.NAVY.mil
Subject: Re: FW: Response to Landfarm comments

Gentlemen,

We have no further comments or questions on the Landfarm soil sampling plan addendum. You may consider it approved for use at your discretion. Please send a final copy of the QAPP.

Thanks!
Peter

Brent Thomas J

CNIN To: Peter Ramanauskas/R5/USEPA/US@EPA
<brent_t@crane.navy.mil> cc: "Bill Gates (E-mail)"
<GatesWH@EFDSOUTH.NAVFAC.NAVY.mil>, "Roger Clark
(E-mail)" <clarkr@ttnus.com>
01/22/02 07:30 AM Subject: FW: Response to Landfarm comments

Pete:

Here are the response to the U.S. EPA's comments on the Landfarm soil sampling plan addendum. Please review and let us know if you have any more questions or comments.

Thanks,
Tom Brent

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

From: Gates, Bill (Efdsouth)
[SMTP:GatesWH@EFDSOUTH.NAVFAC.NAVY.mil]
<mailto:[SMTP:GatesWH@EFDSOUTH.NAVFAC.NAVY.mil]>
Sent: Tuesday, January 22, 2002 7:30 AM
To: Brent Thomas J CNIN
Subject: FW: Response to Landfarm comments

Tom - If you concur forward to Pete. Otherwise lets talk to Roger.
Bill

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

From: Clark, Roger [mailto:ClarkR@ttnus.com]
<mailto:[mailto:ClarkR@ttnus.com]>
Sent: Monday, January 21, 2002 12:50 PM
To: Gates, Bill (Efdsouth)
Cc: Francis, Mark; Sinagoga, Leeann
Subject: Response to Landfarm comments

Bill- Pls review and comment- thanks
Response to Comments on the
Phase II Ground Water RCRA Facility Investigation Solid Waste Management Unit 30
(LANDFARM)

Quality Assurance Project Plan Addendum for Soil/Sludge Sampling and
Risk
Screening

Comments from Mr. Peter Ramanauskas - EPA Region 5

- 1) The last sentence on the bottom of page 2 states that the
"Details regarding soil sampling equipment and procedures are included in the previously
approved work plan for the Landfarm." The previously approved work plan was for
groundwater only, however. Please clarify.

Response: You are correct - this was a typo. The sentence

was

re-written as follows:

"Details regarding soil sampling equipment and procedures are included in the previously
approved QAPP for the Old Rifle Range (ORR)

at

Crane (TtNUS, October 2000)".

- 2) The first bullet on page 3 refers to statistical analysis of
Phase 1 data. Please provide more detail on this proposed statistical analysis. Will the
Navy be using the IDEM RISC statistical analyses?

Response: The statistical analytical approach that will be used will be similar to that used
for the Mustard Gas Burial Ground. The appropriate and specific statistical tests to be
used cannot be determined until the analytical data is received and their underlying
distributions are determined. The specific statistical approaches utilized for data analyses
will be described in the report that will be prepared summarizing the findings of the soil
investigation. EPA will receive a copy of this report for review of the approaches used
and conclusions derived therefrom.

With regard to the IDEM RISC portion of the comment, Chapters 3, 6, and 7 of the RISC
Manual provide some guidance regarding adequate sampling that is statistically based.
Some of that guidance is based on the Federal Soil Screening Level guidance
documents with which the Navy is very familiar. The guidance presented is an example
of the tools available to our statistician to conduct his evaluation. However, it was the
Navy's intent to rely on the statistician's expertise (in conjunction with the risk assessor's
needs) to choose the most appropriate tools/techniques and that he would not be limited
to any particular approach. As stated above, whatever approach is used will be
described in the report that will be prepared summarizing the findings of the soil
investigation. EPA will receive a copy of this report for review of the approaches used
and conclusions derived therefrom.

To clarify these issues, the bullet could be re-written as follows:

- "The statistical analysis (specific statistical methodologies to be determined following receipt
of soil data) of the Phase 1 data indicates that exposure point concentrations based on the
Phase 1 data are highly uncertain (e.g., the variability in chemical concentrations noted in the
Phase I samples indicate an inadequate number of samples have been collected), and/or"

320



DEPARTMENT OF THE NAVY

CRANE DIVISION
NAVAL SURFACE WARFARE CENTER
300 HIGHWAY 361
CRANE INDIANA 47522-5001

5-1-2002
IN REPLY REFER TO:

5090
Ser 095/2036
28 JAN 2002

U.S. Environmental Protection Agency, Region V
Waste, Pesticides, & Toxics Division
Waste Management Branch
Corrective Action Section
Attn: Mr. Peter Ramanauskas (DW-8J)
77 West Jackson Blvd.
Chicago, IL 60604

Dear Mr. Ramanauskas:

Crane Division, Naval Surface Warfare Center (NSWC Crane) resubmits for review and approval with incorporated comments the Supplemental Toxicity Report Revision 1. Three copies of the report are provided as enclosure (1). Enclosure (2) is the required certification statement.

NSWC Crane point of contact is Ms. Christine D. Freeman, Code 09511, telephone 812-854-4423.

Sincerely,

JAMES M. HUNSICKER
Director Environmental Protection
Department
By Direction
of The Commander

Encl:

- (1) Supplemental Toxicity Report Revision 1
- (2) Certification Statement

Copy to:

Administrative Record
IDEM (D. Griffin)
SOUTHNAVFACENCOM (Code ES32)
TolTest