



DEPARTMENT OF THE NAVY

CRANE DIVISION  
NAVAL SURFACE WARFARE CENTER  
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CRANE INDIANA 47522-5001

N00164.AR.000880

NSWC CRANE

5090.3a

IN REPLY REFER TO:

5090/S4.7.1  
Ser RP3/4201

12 JUL 2004

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 submits responses to the June 30, 2004 U. S. EPA comments on the Quality Assurance Project Plan (QAPP) Addendum No.2 for Solid Waste Management Units (SWMUs) 12, 13, 16, & 19 (Mine Fill A, Mine Fill B, Building 146 Area, and Pyrotechnic Test Area, respectively). The comment responses along with the changed QAPP pages are found as enclosure (1). The permit required Certification Statement is provided as enclosure (2).

If you require any further information, my point of contact is Mr. Thomas J. Brent, Code RP3-TB, at 812-854-6160, email [brent\\_t@crane.navy.mil](mailto:brent_t@crane.navy.mil).

Sincerely,

JAMES M. HUNSICKER  
Manager, Environmental Protection  
By direction of the Commanding Officer

Encl:

- (1) Responses to Comments and Change Pages for the SWMUs 12, 13, 16, & 19 QAPP Addendum #2
- (2) Certification Statement

Copy to:

ADMINISTRATIVE RECORD  
SOUTHNAVFACENCOM (Code ES32) (w/o encl)  
IDEM (Doug Griffin)  
TTNUS (Ralph Basinski) (w/o encl)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

James M. Hunsacki  
SIGNATURE

Manager, Environmental Protection  
TITLE

7/12/2004  
DATE

**RESPONSE TO U.S. EPA REGION 5 COMMENTS  
DATED JUNE 30, 2004 (via e-mail)  
ON  
QUALITY ASSURANCE PROJECT PLAN  
ADDENDUM NO.2  
SWMU'S 12, 13, 16, AND 19  
RCRA FACILITY INVESTIGATION**

**EPA Comment:  
Response to Comment 8:**

Referring to the surface water/sediment sampling at SWMU 16, I don't see 16SW/SD14 on Figure 3-4. Is this supposed to be 16SW/SD11? Also, I'm fine with adding 16SW/SD10 and removing 16SW/SD22, but how about adding 16SW/SD30 to monitor farther down the tributary should there be discharges/seeps to surface water further away from SWMU 16? Finally, Page 2 of Table 3-14 does not seem to reflect the modifications proposed in the response to comment 8. Verify that all tables are modified appropriately.

During Round 2 field sampling activities, the sample for 16SW/SD14 was incorrectly collected at a location that was north of the proposed location. Therefore, for Round 3, location 16SW/SD30 was added at the location that 16SW/SD14 was initially proposed. The sample location for 16SW/SD30 is located farther down the tributary from sample locations 16SW/SD11 and 16SW/SD22 to monitor surface water conditions further away from SWMU 16.

The original response to comment 8 indicated that sample location 16SW/SD14 will be one of two locations used to monitor drainage from the western side of the SWMU. The location should be 16SW/SD30, which replaced 16SW/SD14.

Tables 3-12, 3-13, 3-14, and 3-15 which are affected by the comment 8 response, have been modified as indicated below, and are attached.

Table 3-12 (surface water for Round 3) has been modified by removing sample location 16SW/SD14.

Table 3-13 (summary of surface water for Round 3) has been updated due to modifying Table 3-12.

Table 3-14 (surface water for Rounds 4 through 9) has been modified by removing sample location 16SW/SD14 and adding 16SW/SD30. Also note the sample IDs in Table 3-14 for both SWMUs 13 and 16 were incorrect and have been modified. The round identifier at the end of the sample ID has been replaced with the actual sample number collected. For example, at sample location 13SW/SD11 a surface water sample will be collected for the third time during Round 4, and therefore, the sample ID would be 13SW1103. The same location sampled during Round 5 would have a sample ID of 13SW1104.

Table 3-15 (summary of surface water for Rounds 4 through 9) has been updated due to modifying Table 3-14.

**New comment:**

**When vegetative samples are taken, identify which species are present (if any) at SWMU 13 that have been shown in the literature to have an affinity for removing explosives from groundwater. Have you had any luck obtaining information about the Yucca plant study that was done using plants from the Mine Fills? It seems to me that the study may never have been completed.**

The plant species that are present in the area where vegetative samples are to be taken will be identified, prior to collection of the samples. The identification of plant species will be made by the field biologist in consultation with the NSWC Crane forester. If this is not possible, samples of the plant will be shipped to a biologist for identification. This procedure is described in Section 3.5 of SOP CTO166-24. If plant species are present, which have been shown to have an affinity for explosives from groundwater, these will be preferentially sampled.

The Navy has not been able to obtain information about the Yucca plant study.

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The letter Ser RP3/4201 was for the submittal of the response to comments and change pages for the Final Quality Assurance Project Plan Addendum No. 2 for Solid Waste Management Units 12, 13, 16, and 19. Updated pages added to final report submitted on 5/19/04.