



DEPARTMENT OF THE NAVY
CRANE DIVISION
NAVAL SURFACE WARFARE CENTER
300 HIGHWAY 361
CRANE INDIANA 47522-5001

N00164.AR.000890
NSWC CRANE
5090.3a

IN REPLY REFER TO:

5090/H14.3
Ser RP3/4261

9 SEP 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, for your review and approval, the response to U.S. Environmental Protection Agency comments dated 12 Aug 2004 for the Amendment for the Grit Blast Closure Plan as enclosure (1). The Amendment covers the Surface Water Sampling Standard Operation Procedure (SOP) for the Grit Blast Closure. A copy of the replacement pages for the Final Closure Plan Grit Blast Site Building 3220 and the Surrounding Area dated January 2003 is included as enclosure (2). Enclosure (3) is the permit required certification statement.

If you require any further information, my point of contact is Ms. Christine Freeman, Code RP3-CF, at 812-854-4423, or email christine.freeman@navy.mil.

Sincerely,

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

- Encl: 1. Response to comments for Grit Blast Closure Amendment
2. Replacement Pages for Grit Blast Closure
3. Certification Statement

Copy to:
Administrative Record
IDEM (D. Griffin)
NAVSEA 04XQ CHAS DET
TOLTEST Odon

ENCLOSURE 1

**RESPONSE TO COMMENTS FOR
GRIT BLAST CLOSURE
SURFACE WATER SAMPLING SOP AMENDMENT**

**Response to Comment for Grit Blast Closure Surface Water Sampling SOP
Amendment 12 August 2004
EPA Comments**

Comment 1:

Page 1, the second paragraph of the 'Procedure' section states that there are several potential sampling points inside B-2720, but cross contamination from other sources inside the building eliminate these from consideration. What are these "other sources" and what chemicals would they release? Lead and chromium? Other? Where does runoff flowing along the west side of B-2720 end up?

Response 1:

The text has been revised to eliminate the confusion of discussing B2720 unrelated processes. B2720 is a railroad car repair building where cutting, welding, and other maintenance on railroad engines and cars occurs that could produce oils, asbestos, and residues containing lead and chromium. All materials generated within B2720 are treated in accordance with applicable rules and regulations. Personnel reported to ToITest that water flows into the building, however after further investigation by RP3, it has been discovered that the statement concerned past operations. An earthen berm was constructed almost two years ago that reroutes runoff water around the west side of the building. Other sample points that would better represent surface water conditions outside the building have been proposed.

The text has also been revised to explain where surface water on the west side of B-2720 flows (to the south).

Comment 2:

Referring to the third paragraph of the 'Procedure' section, take a surface soil or sediment sample from the area between the 6-inch and 12-inch pipes.

Response 2:

Text has been added to include this sample.

**Comment Resolution for Grit Blast Surface Water Sampling SOP May 2004
EPA Comments**

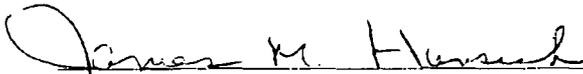
Comment 3:

First, page 27 of the 6010 SOP indicated that reporting limits for Chromium and Nickel are 10 ug/L, whereas the table labeled Contaminants of Concern on p. 3 of 3 stated 5 ug/L for both (although in the case of chromium they indicated the value was for hexavalent chromium). Confirm that analysis will be done for total chromium, but will be compared to a hexavalent chromium closure value.

Response 3:

The table on page 3 has been updated to reflect the 10 ug/L detection limit and text has been added to reflect that analysis will be for total chromium but the results will be compared to a hexavalent chromium closure value.

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.



SIGNATURE

MANAGER, ENVIRONMENTAL PROTECTION
BY DIRECTION OF THE COMMANDING OFFICER

TITLE

9/9/04
DATE

5090
Ser RP3/4261

9 Sept 2004

The letter Ser RP3/4261 was for the response to comments and replacement pages for the amendment to the Grit Blast (A01/00) Closure Plan submitted on 3/25/03. Replacement pages added to Surface Water Sampling SOP Amendment at the end of Final report.