



TETRA TECH

PITT-06-9-003

June 4, 2009

Project Number 112G01573

Mr. Howard Hickey
NAVFAC MW
201 Decatur Avenue
Building 1A, Code EV
Great Lakes, Illinois 60088

Subject: CLEAN Contract N62467-94-D-0888
Contract Task Order No. F271

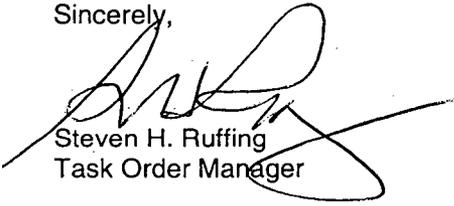
RE: Responses to United States EPA Comments (May 18, 2009) Regarding
SWMU 12 Interim Measures Work Plan (IMWP) – Battery Dump Site
Naval Surface Warfare Center (NSWC) Crane, Indiana

Dear Mr. Hickey:

On May 18, 2009 the United States Environmental Protection Agency provided Tetra Tech with comments on the Interim Measures Work Plan (IMWP) for Solid Waste Management Unit (SWMU) 12 - Battery Dump Site, dated April 2009. Enclosed are the responses to these comments.

If you have any questions or comments concerning the response to comments document, please contact myself at (412) 921-8989 (e-mail Steve.Ruffing@tetrattech.com) or Tim Smith at (412) 921-7720 (e-mail Timothy.Smith@tetrattech.com).

Sincerely,



Steven H. Ruffing
Task Order Manager

SHR/clm

Enclosure

cc: Mr. Tom Brent, NSWC Crane (letter and enclosure – 3 copies)
Ms. Bonnie Capito, NAVFAC Atlantic (PDF copy of letter via e-mail)
Mr. Glenn Wagner, Tetra Tech (letter and enclosure)
Mr. John Trepanowski, Tetra Tech (letter and enclosure)
Mr. Garth Glenn, Tetra Tech (letter only)
Mr. Timothy Smith, Tetra Tech (letter and enclosure)
Project File – CTO F271

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**RESPONSE TO MAY 18, 2009 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
(EPA) COMMENTS (E-MAIL FROM PETER RAMANAUSKAS)
ON THE INTERIM MEASURES WORK PLAN (IMWP)
FOR SWMU 12 – BATTERY DUMP SITE
NAVAL SURFACE WARFARE CENTER
CRANE, INDIANA**

Comments provided by the EPA are shown in bold font. Responses following each EPA comment are shown in regular font. Changes to the IMWP are italicized and enclosed in quotation marks.

EPA Comment 1:

Table 2-2, Footnote 3: It appears that the numbers in the table identified as being IDEM Default Closure Levels for Migration to Groundwater are really the IDEM Direct Contact numbers. The footnote or the values in the table should be corrected as needed.

Response to EPA Comment 1:

The numbers reported in the table are IDEM Direct Contact numbers, Footnote 3 has been revised to read as follows;

"3 Human Health COC. Human Health Cleanup Goals indicate the lowest of calculated risk level for direct contact reported in the RFI (Oak Ridge National Laboratory Screening Level for Iron), the IDEM Direct Contact concentration, and the maximum background detection."

EPA Comment 2:

The tables presented on pages 3-4 and 3-5 contain footnotes indicating that certain volumes of removed soils may be expected to exhibit hazardous characteristics based on TCLP results. This seems to contradict the table on page 3-7 which labels the same volumes of soils as non-hazardous. Please clarify and provide some additional information on how the Navy will verify the boundaries and volumes of hazardous soils and ensure such soils are kept segregated from non-hazardous soils upon removal.

Response to EPA Comment 2:

The note that accompanies the tables on pages 3-4 and 3-5 is to indicate that the Contractor must verify the non-hazardous soil determination by running TCLP analysis on the excavated soil. Note 1 on both of these tables has been revised to read as follows;

"1 Reported volume is expected to be non-hazardous, the EMAC Contractor must verify this through TCLP testing prior to offsite disposal."

EPA Comment 3:

Referring to Section 3.2.4, please provide some additional information on how the XRF screening will be done. If the procedures are identical to a previously approved workplan, supplement this workplan with that information or reference the previously approved workplan/procedures and state how field crews will know to follow those procedures.

Response to EPA Comment 3:

The procedures for analyzing the samples with XRF will be presented in the QAPP (see Response to EPA Comment 4 for information on the QAPP preparation). The text will be revised to reference the QAPP and to direct the sampler to follow the XRF procedures identified in the QAPP. The revised text for Section 3.2.4 has been revised as follows

“Verification samples will be collected from the excavation floors and sidewalls to confirm the removal of COCs at concentrations that result in unacceptable human health or ecological risk. The collection of verification samples will be performed by Tt in accordance with the Quality Assurance Project Plan (QAPP). Additionally, the EMAC Contractor may be required to assist in the collection of the verification samples by using their decontaminated excavation equipment for verification sample soil retrieval. To guide excavation activities, these samples will be field tested with XRF (Tt personnel will follow XRF sampling and analysis procedures presented in the QAPP). XRF sample results will be reviewed by the Navy along with historic correlation information between XRF and fixed base laboratory results to determine whether additional excavation is necessary or if the verification sample should be sent to a fixed-base laboratory for final determination of remaining COC concentrations. In addition to the collection of verification samples from the excavations, verification samples will be collected from the surface soil below the decontamination pad, material handling pad, gravel construction entrance, and any other support facility constructed by the EMAC Contractor. Although not required, the EMAC Contractor may want to collect samples from these proposed support facilities areas for comparison with support facilities verification samples. Verification sampling and analysis procedures and acceptable COC concentrations are provided in Section 5.0 and the QAPP. Based on historic removal actions, the EMAC Contractor can expect a 5 business day delay between verification sample collection and availability of fix-based laboratory analytical results. While awaiting the results of verification samples, exposed soil must be covered with plastic sheeting.”

EPA Comment 4:

Is there a previously EPA approved QAPP the Navy anticipates to reference that can cover these activities?

Response to EPA Comment 4:

There is not a current EPA approved Quality Assurance Project Plan (QAPP) for the activities associated with the SWMU 12 Battery Dump Site IMWP. It is anticipated that an addendum to the EPA approved QAPP titled Resource Conservation and Recovery Act QAPP for SWMUs 8, 9, 15, 18, 19, 20, and the Old Gun Tub Storage Lot and Interim Measures at SWMU 7 (Old Rifle Range), SWMU 8 (Building 106 Pond), SWMU 13 (Mine Fill B), SWMU 17 (PCB Burial/Pole Yard), and SWMU 9 (Pesticide Control Area) (Addendum No. 4 dated September 2008) will be prepared to include the activities associated with SMWU 12 Battery Dump Site IMWP prior to start of IMWP implementation.

EPA Comment 5:

Referring to Section 5.1, please provide design drawings similar to Figure 4-2 for the decontamination pad, dewatering pad, material storage areas, referenced here.

Response to EPA Comment 5:

Details are not provided in the IMWP for these support facilities because they are specific to the equipment that the Environmental Multiple Award Contract (EMAC) Contractor uses to perform the work. Details of these devices should be included in the EMAC Contractor's work plan.