

N00164.AR.002221
NSA CRANE
5090.3a

EMAIL AND THE INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
COMMENTS ON THE DRAFT FINAL RESOURCE CONSERVATION AND RECOVERY ACT
FACILITY INVESTIGATION REPORT SOLID WASTE MANAGEMENT UNIT 11 (SWMU 11)
OLD STORAGE BUILDING B-225 NSA CRANE IN
10/01/2014
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Buel, Jennifer

Subject: RE: SWMU 11 OSB B-225 RFI Report

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

From: GRIFFIN, DOUG [mailto:DGRIFFIN@idem.IN.gov]

Sent: Wednesday, October 01, 2014 9:58 AM

To: Cole, Linda L CIV NAVFAC MIDLANT, IPTNE; Brent, Thomas CIV NAVFAC MIDLANT, PWD Crane

Subject: SWMU 11 OSB B-225 RFI Report

May 2015 RFI Report and proposal

The report uses Johnson-Ettinger modeling to dismiss concerns about vapor intrusion. Johnson-Ettinger modeling has not been accepted by IDEM for years and is no longer accepted by EPA. TCE concentrations in groundwater greater than 9.1 ppb for residential, or 38 ppb for industrial, require indoor air sampling (not very practical in this case) or an ERIC that requires a vapor mitigation system.

The report recommends a CMS with an emphasis on MNA. This TCE contamination has been in place since at least 1976 and remains at high enough concentrations to represent a vapor intrusion concern. A plan for MNA will need to have a Plan B to take effect if the concentrations in groundwater don't attenuate to a preset goal within a reasonable time frame.