N00164.AR.002544
NSA CRANE
5090.3a

U S NAVY RESPONSE TO THE U S EPA REGION V COMMENTS TIER II SAMPLING AND ANALYSIS PLAN FOR SOLID WASTE MANAGEMENT PLAN 16 (SWMU 16) NSA CRANE IN
08/05/2011
NAVFAC MID ATLANTIC

AUGUST 5 2011
(see submittal letter
dated 8/9/2011)

RESPONSES TO EPA COMMENTS RECEIVED AUGUST 4, 2011

TIER II SAP FOR SWMU 16

NSA CRANE

Comment 1: In the new proposed text, remove reference to the Corrective Measures Study and proposed Alternative S-3 since this CMP hasn't been submitted.

Response: All references to the findings of the Corrective Measures Study have been removed from the SAP. In particular, Section 4.3 has been renamed "Summary of Proposed Interim Measures" and has been revised accordingly.

Comment 2: When determining which specific location of a surface or subsurface sample interval to collect, use the following hierarchy (borrowed from SOP-07 - new text in italics): If elevated volatile organics are measured via the PID, collect the VOC samples from the specific interval where the highest PID reading is measured. If no above-background PID readings are measured, then the VOC sample will be collected from a specific interval where visual signs of contamination (staining, etc.) are observed. If no above-background PID reading is measured, and no discoloration or odor in the soil core indicates potential contamination, then collect the VOC sample from near the center of the core *at the bottom of the interval.*

Response: The second to last sentence of Section 3.2 of SOP-07 has been revised to state:

If no above-background PID readings are measured, then the VOC sample will be collected from a specific interval where visual signs of contamination (staining, etc.) are observed. If no above-background PID reading is measured, and no discoloration or odor in the soil core indicates potential contamination, then collect the VOC sample from near the center of the core at the bottom of the interval.

In addition, the following text has been added to the eighth paragraph of Worksheet 7.0:

Sample collection for VOC parameters will follow the methodology described in SOP-07.

The following text has been added to the end of Section 7.1:

NOTE: Collection of the soil sample from the appropriate interval for VOC analyses is critical. When determining the specific location within the soil boring for sample collection, the following hierarchy must be followed:

If elevated volatile organics are measured via the PID, collect the VOC samples from the specific interval where the highest PID reading is measured. If no above-background PID readings are measured, then the VOC sample will be collected from a specific interval where visual signs of contamination (staining, etc.) are observed. If no above-background PID reading is measured, and no discoloration or odor in the soil core indicates potential contamination, then collect the VOC sample from near the center of the core at the bottom of the interval.

The following text has been added to the end of Section 7.3:

NOTE: See the discussion regarding the collection of soil samples for VOC analyses in Section 7.1.

Comment 3: IDEM Default Migration to Groundwater numbers do not apply to karst terrain and fractured flow geology (see RISC Technical Guidance Section 7.5.2). Given that the source area is approximately 0.5 acre and groundwater remediation will be addressed in the Corrective Measure Proposal, we will accept the PRG based MCS using DAF 20.

Response: This comment is noted. No response is required.

Comment 6: Where is Worksheet 8.3?

Response: The second paragraph in Worksheet 5 Section 4 has been revised to read:

TCE and Metals Contamination Area Decision Rule

If all data have been collected as planned (See Tables No. 8.1 and No. 8.3)...

The fifth paragraph in Worksheet 5 Section 4 has been revised to read:

UST Area Decision Rule

To determine whether soil contamination is present at the UST Area, the following decision rule will be applied to the data obtained in this investigation:

If all data have been collected as planned (See Tables No. 8.1 and No. 8.3)...

Comment 12: Note that 1,1,1 - TCA is on the UST target list, and p-dioxane is a known stabilizer in that chemical. Also, p-dioxane is commonly found at federal military installations.

http://www.clu-in.org/contaminantfocus/default.focus/sec/1,4-Dioxane/cat/Overview/

Consider holding the sample aliquot and analyzing for p-dioxane in the event that 1,1,1 - TCA is detected at the UST area.

Response: A separate sample will be collected and held for analysis of p-dioxane by SW 846 8270C. If 1,2,2 – TCA is detected, this sample will be analyzed for p-dioxane.

Comment 13: Referring to p. 48, (Table), the heading for the metals suite should probably begin, "Metals Contamination Area."?

Response: The heading on Worksheet 9.0 has been changed from *"Metals" to "Metals Contamination Area"*

Comment 14: Referring to SOP-07, to be conservative, GRO - soil samples should probably be collected as "soil VOCs" using the procedure described for the Terra Core device. Otherwise, the lower carbon GRO constituents (e.g. benzene, toluene) might volatilize.

Response: Section 1.0, paragraph 1, sentence 2 of SOP-07 has been revised to read:

This procedure also describes the collection of samples for analysis of volatile organic compounds (VOCs), including total petroleum hydrocarbon (TPH) gasoline range organics (GRO), in accordance with USEPA Method 5035A and the use of field screening [i.e., photoionization detector (PID)] to select the subsurface soil intervals for VOC sampling.

Section 3.3, paragraph 1, sentence 2 of SOP-07 has been revised to read:

Soil samples collected for volatile organics will be obtained directly from soil cores using Terra Core® samplers for each VOC and TPH-GRO sample.

Comment 15: The moisture container was left unstated in section 4.2.

Response: Section 4.2, paragraph 3 of SOP-07 has been revised to read:

Fill the required sample containers in the following order:

- *Container for other organic analyses (i.e., total petroleum hydrocarbons-diesel range organics [TPH-DRO]),*
- *Container for metals,*
- *Container for moisture.*

Comment 16: This may still be okay, as long as the most conservative (sensitive) analytical method is selected for the metals. ICP-MS (6020) certainly is a good bet to produce data that will be useable for eco-risk decision-making.

Response: This comment is noted. No response is required.

Less Significant Comments

Comment 1: Change Cisneros' title to "USEPA Remediation and Reuse Branch Chief", and add Debus as QA- signee.

Response: Mr. Cisneros' title has been changed to "USEPA Remediation and Reuse Branch Chief", and Mr. Allen Debus has been added as the "Quality Assurance Manager" to the Title Page of the SAP.

Comment 4: Typo - p. 16, "with"

Response: The sentence at the top of page 16 of 62 has been revised to read:

"...delineation of the areas of soil impacted with metals which were generally identified during the Resource Conservation and Recovery Act Facility Investigation (RFI) at concentrations above MCSs."

Comment 16: While MTBE may be analyzed using 8260B according to SW-846 guidance, MTBE is not specifically included on RTI's ELAP Accreditation sheet. Could some further evidence be provided that they have such capability? (e.g. recent performance evaluation data)

Response; RTI is certified by the state of Utah for MTBE. A copy of the certification is included in Appendix B. In addition, RTI will provide data demonstrating successful analysis of EPA Performance Testing samples for MTBE. This documentation will be added to Appendix B. NOTE: The incorrect ELAP certification was included in Appendix B. The correct ELAP Certification is now included.