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NSA CRANE
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TRANSMITTAL EMAIL AND U S NAVY RESPONSES TO INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT COMMENTS ON THE DRAFT FINAL INTERIM
MEASURES REPORT FOR SOLID WASTE MANAGEMENT UNIT 23 (SWMU 23) BATTERY
SHOP NSA CRANE IN
2/25/2016
NAVFAC MID ATLANTIC

Cohen, Deborah

From: Brent, Thomas CIV NAVFAC MIDLANT, PWD Crane <thomas.brent@navy.mil>
Sent: Thursday, February 25, 2016 3:07 PM
To: GRIFFIN, DOUG
Cc: Cole, Linda L CIV NAVFAC MIDLANT, IPTNORTH; Cohen, Deborah
Subject: RE: NSA Crane - SWMU 23 - Status - 20150918
Attachments: Responses to IDEM Comments dated 012016.docx
Signed By: thomas.brent@navy.mil

Doug,

Attached are responses to your comments. Mostly, they're clarifications that the recommendations you made are addressed in the RFI which was submitted to you after the IMR was submitted. The RFI includes post-IM exposure calculations. Please let us know if you have any further comments or questions.

Thanks,
Tom

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

From: GRIFFIN, DOUG [mailto:DGRIFIN@idem.IN.gov]
Sent: Wednesday, January 20, 2016 9:29 AM
To: Brent, Thomas CIV NAVFAC MIDLANT, PWD Crane
Cc: Cole, Linda L CIV NAVFAC MIDLANT, IPTNORTH; Cohen, Deborah
Subject: [Non-DoD Source] RE: NSA Crane - SWMU 23 - Status - 20150918

OK Tom.

I don't see any problems with the work that was done in the IM.

The Recommendations suggest updating the RFI Report and recalculating the exposures under the current conditions. First, I don't see any reason to touch the RFI Report, but the Final version of this IM report could discuss the updated exposures. Since the IM was designed to get the exposures down to acceptable levels that shouldn't be a complex undertaking:

Figure 2-3 shows the Pb concentrations after the excavations. Use the mean of the outlying areas (visually that looks to be about 15-20) as the value for the 'Removed' (we're assuming your fill material is no higher than the background) and calculate a new mean for the area, which will be very low. This calculation may have even been done (should have been done) as part of the planning for the IMWP.

Figure 2-2 shows the PAH concentrations after the excavations. Do a similar exercise...replace the 'Removed' with the quantitation limit (.004) and calculate an overall mean exposure number. Again, this should have been done already as part of the planning.

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

From: Brent, Thomas CIV NAVFAC MIDLANT, PWD Crane [mailto:thomas.brent@navy.mil]
Sent: Friday, January 15, 2016 12:50 PM
To: GRIFFIN, DOUG
Cc: Cole, Linda L CIV NAVFAC MIDLANT, IPTNORTH; Cohen, Deborah

**Responses to IDEM Comments Dated 01/20/16
Draft Final Interim Measures Report Dated September 2015
SWMU 23 – Battery Shop Building 36
Naval Support Activity Crane
Crane, Indiana**

- (1) The Recommendations suggest updating the RFI Report and recalculating the exposures under the current conditions. First, I don't see any reason to touch the RFI Report, but the Final version of this IM report could discuss the updated exposures. Since the IM was designed to get the exposures down to acceptable levels that shouldn't be a complex undertaking:**

Response: The DON agrees that under normal circumstances (when the RFI has been finalized) the IM Report should document the current risk (after the IM). However, the RFI for SWMU 23 was never finalized. The SWMU 23 Draft Final RFI Report, submitted for IDEM review in January 2016, provides the post-IM nature and extent of contamination and human health and ecological risks for SWMU 23. No change to the IM Report is warranted in response to this comment.

- (2) Figure 2-3 shows the Pb concentrations after the excavations. Use the mean of the outlying areas (visually that looks to be about 15-20) as the value for the 'Removed' (we're assuming your fill material is no higher than the background) and calculate a new mean for the area, which will be very low. This calculation may have even been done (should have been done) as part of the planning for the IMWP.**

Response: No change to Figure 2-3 was taken in response this comment. The intent of Figure 2-3 is to present post IM soil lead concentrations that remain at the site. No calculations regarding remaining lead concentrations or associated risks was completed as part of the IM Report because this information is provided in the RFI Report under IDEM review (see the Navy's response to Comment No. 1).

- (3) Figure 2-2 shows the PAH concentrations after the excavations. Do a similar exercise...replace the 'Removed' with the quantitation limit (.004) and calculate an overall mean exposure number. Again, this should have been done already as part of the planning.**

Response: No change to Figure 2-2 was taken in response this comment. The intent of Figure 2-2 is to present post IM soil PAH (based on BaP Equivalent) concentrations that remained at the site after excavations were complete. No calculations regarding remaining BaP Equivalent concentrations was completed as part of the IM Report because this information is provided in the RFI Report under IDEM review (see the Navy's response to Comment No. 1).