

N61165.AR.002864
CNC CHARLESTON
5090.3a

LETTER TRANSMITTING COMMENTS ON RECOURSE CONSERVATION AND RECOVERY
ACT FACILITY INVESTIGATION WORK PLAN ZONES J AND L CNC CHARLESTON SC
7/7/1995
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



Commissioner: Douglas E. Bryant

Board: John H. Burriss Chairman
Sandra J. Molander, Secretary

Promoting Health, Protecting the Environment

Richard E. Jabbour, DDS,
William M. Hull, Jr., MD
Roger Leaks, Jr.

Office of Ocean and Coastal Resource Management

H. Wayne Beam, Ph.D., Deputy Commissioner

Christopher L. Brooks, Assistant Deputy Commissioner

(803) 744-5838

(803) 744-5847

July 7, 1995

Commanding Officer
Attn: Mr. Tony Hunt/Code 1877
SOUTHDIVNAVFACENGCOM
2155 Eagle Drive
Charleston, SC

Re: Draft RFI Zone J Work Plan
Zone J and L Work Plans
Naval Base Charleston
Charleston, SC

Dear Mr. Hunt:

This letter is written to comment on the proposed work plans for the two zones referenced above. In reviewing the work plan I noticed that sediment samples would be taken adjacent to many of the outfalls into freshwater and saltwater wetlands that are located on the property. However, I was unable to determine what constituents or pollutants the sediment samples would be testing. The Office of Ocean and Coastal Resource Management would appreciate being able to review the proposed sample regiment for these outfalls. Also, we feel that the effluent coming out of the stormwater pipes should be sampled. Many of the test site locations are shown as receiving both sediment and water column analysis but I was not clear as to whether or not any samples of the actual runoff water were proposed in this sampling schedule. If these types of tests have not been included, we feel that they should be added to most stormwater outfalls in order to determine exactly what these outfalls are carrying into these wetland areas.

Regarding AC IV-1, there are several outfalls indicated into this wetland area that are not proposed to be tested. Particularly a stormwater outfall coming off Viaduct Road and discharging into the grassy wetland area. It is our opinion that a sample should be taken of this area as well. AC V-1 is the wetland area adjacent to Shipyard Creek. Both sides of this creek are surrounded by buildings and past naval construction, yet there is only one outfall indicated into this creek, and no sample is proposed at this outfall. This area should be investigated to determine the condition of the runoff water discharging into

this wetland area, and if additional outfalls are located in these areas, they should be included and a sediment and stormwater sample be taken at each outfall. AC V-2 is another area of intertidal wetlands located adjacent to Shipyard Creek as well as a forested wetland contiguous to the intertidal area. This area is bordered by parking facilities as well as extensive development, yet very few stormwater outfalls are indicated as discharging into this area. This area should again be surveyed for additional discharge locations. The outfalls once located should be sampled in locations adjacent to these outfalls.

Regarding the spoil disposal site at the southern end of the base, there are several spillways indicated adjacent to the dredged spoil area yet the sample stations are not located adjacent to the spillway areas. Sediment samples should be taken adjacent to the spillways. Also, it is very likely that additional stormwater discharges outfall into the Cooper River along this area, yet the maps do not indicate the location of any of these discharges. The area should be re-surveyed to locate any outfalls, and where they are located new stations added. The report states that 13 identified stormwater outfalls discharge into the fresh wetlands along the Cooper River and 18 outfalls discharge into wetlands along southern shorelines. Other outfalls include a drainage ditch, spillway within the dredge disposal area and surface runoff from the marina parking area. It is not clear to me that all of these outfall locations are proposed to be sampled by sediment and stormwater samples. Samples are proposed intermittently, however, I feel that samples should be taken at all of these outfalls to get a realistic picture of what is actually being discharged into the river and where additional treatment or remediation measures might be required. Additionally, there are two large slips that have been constructed at the Northern boundary of ESA #3. Only one sediment stormwater sample is proposed in this area. This seems inadequate because of the enclosed nature and likely intensive use (a dry dock?); it would be more realistic to provide additional samples in this area.

ESA VIII Clouter Island discharges from the spoil area. Again, sampling stations should be located at the outfalls from the spillways sediment samples as well as water column samples should be included in the testing.

Please be aware that as many sampling procedures may require the use of equipment in intertidal wetland areas. There is a possibility that wetlands can be impacted by the testing operation. Measures should be taken to avoid permanent alterations caused by drilling sampling, wells, or similar measures, and areas should be restored to previously existing conditions. The OCRM has issued a general permit for doing soil boring in jurisdictional wetlands and all testing contractors should comply with the terms and conditions of this permit if they are undertaking using drilling rigs or similar equipment in wetland areas.

Zone L work plan:

The OCRM is very interested in how the stormwater system has operated in the past and if there have been any contamination problems resulting from the system. The sampling of the oil and water separators particularly interests us. The discharge from the oil and water separators into the Cooper River or the stormwater systems that ultimately discharge into the Cooper River should be fully investigated. It is unclear to me the extent of the sampling program that is proposed to be undertaken around these oil and water

separators. The sampling program of the sanitary sewer system should be adequate. Again, we are particularly interested in the results in any breaks in sewer lines that are a result into a situation that could discharge into the Cooper River or the adjacent wetlands and waterbodies.

The Zone L plan states that the stormwater system can collect and discharge 8.3 million gallons for a one half inch rainfall event over two hour period. Because this is a relatively small rainfall amount, the actual discharge can be well in excess of 8.3 million gallons. Some sections of the system are very old, created at the turn of the century. We feel that this system has the great potential to effect the ecology of the adjacent tidal waterbodies. The proposed methods for investigating the stormwater sewer system appear to be adequate and a reasonable approach. I would appreciate having our engineers more activity involved in the review of the data collected during the analysis of this system. Any large breaks in the system should be investigated thoroughly.

We appreciate the opportunity to review these documents and look forward to working with the Navy as these areas are analyzed.

Please contact me if I can answer any questions regarding this matter.

Sincerely,



Robert D. Mikell
Director of Planning
and Federal Certification

RDM/G/common/Ensafe/jk

cc: Dr. H. Wayne Beam
Mr. Christopher L. Brooks
Mr. H. Stephen Snyder