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REGULATORY COMMITTEE RESPONSE TO SOUTH CAROLINA DEPARTMENT OF
HEALTH AND ENVIRONMENTAL CONTROL COMMENTS ON DRAFT COMPREHENSIVE
CORRECTIVE MEASURE STUDY CNC CHARLESTON SC

8/12/1997
ENSAFE



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August 12, 1997

Mr. Johnny Tapia
Bureau of Land and Hazardous Waste
South Carolina Department of Health and Environmental Control
8901 Farrow Road
Columbia, South Carolina 29203

Re: Charleston Naval Complex Draft Comprehensive Corrective Measures Study, Project Management Plan and Work Plan (dated January 31, 1997), Formal Response to United States Environmental Protection Agency Comments

Dear Mr. Tapia:

This letter is being written to formally respond to comments from Mr. Jay Bassett, Remedial Project Manager, Region IV, of the United States Environmental Protection Agency (USEPA) regarding the referenced document. This study was prepared by EnSafe/Allen & Hoshall (E/A&H) for the Department of the Navy, Southern Division Naval Facilities Engineering Command, in Charleston, South Carolina.

Mr. Bassett's comments were received by way of an e-mail message dated April 2, 1997. These comments were noted and incorporated into the final version of the Comprehensive Corrective Measures Study (CMS), Project Management Plan (PMP) and Work Plan (WP), dated June 25, 1997. However, a formal response (i.e., a comment/response-to-comment (C/RTC) written document) to the USEPA comments was not completed. It should be noted that the official C/RTC written document was completed in June of 1997 and was included with the final version of the Comprehensive CMS PMP and WP. The official C/RTC document responded to twenty comments made by the South Carolina Department of Health and Environmental Control only.

As a clarification, Mr. Bassett's comments have been paraphrased below and the corresponding E/A&H responses are noted. Please note that the former joint venture of E/A&H is now being represented by EnSafe Inc. (as of Spring 1997).

USEPA Comment 1

Figure 2-1 (of the draft PMP), Corrective Action Flow Chart, and the task list on page 6-2, Proposed Project Work Tasks (of the draft PMP), are confusing and do not include site management decision points (SMDPs) or nodes to indicate when important decisions are

required. No further action (NFA) designations are not part of the CMS process and thus the figure should reflect this.

E/A&H Response 1

Figure 2-1 and the list on page 6-2 have been extensively revised for the final Comprehensive CMS PMP and WP document. Decision points have been included in Figure 2-1 and the work task list on page 6-2 has been rewritten to more accurately reflect the changes in the figure. In addition, NFA designations are now shown to occur "prior" to implementation of the CMS process.

USEPA Comment 2

First paragraph of page 2-4 (of the draft PMP). The evaluation and designation of sites warranting CMS should be completed in the RFI and not the CMS.

E/A&H Response 2

Concur. The text was revised accordingly.

USEPA Comment 3

Fourth paragraph of page 2-4 (of the draft PMP) and list of tasks on page 6-2 (of the draft PMP). Several task items appear redundant. We (the Project Team) can speed up the review process if we agree to a less stringent (i.e., less oversight) approval and review process.

E/A&H Response 3

Concur, if the Project Team concurs. The text was revised accordingly.

USEPA Comment 4

Section 2.3.5 on page 2-23 (of the draft PMP), cost estimating. A sensitivity analysis should be performed for potential remedial alternatives that cost more than \$1,000,000. The analysis would highlight significant cost-sensitive parameters and therefore aid in the remedy evaluation process.

E/A&H Response 4

Concur. The text was revised on page 2-24 to include a paragraph stating the significance of cost sensitivity in evaluating potential remedies.

USEPA Comment 5

List of tasks on page 6-2 (of the draft PMP). This list could be shortened by combining and eliminating some steps. Expediting the CMS process should be the objective of streamlining this list.

E/A&H Response 5

Concur. Please refer to our response to comments number 1 and 3.

USEPA Comment 6

Table 2-1, Treatment Technologies Screening Matrix (of the draft WP). Need to add intrinsic bioremediation to groundwater matrix.

E/A&H Response 6

Intrinsic bioremediation is listed as natural attenuation and it is the first groundwater technology presented in Table 2-1. Contaminants treated and appropriate data quality needs are also presented in Table 2-1.

USEPA Comment 7

Section 5, Treatability Study Plan (of the draft WP). Treatability studies can be long and expensive. It is recommended that the Project Team be involved in any decisions pertaining to Treatability need and scope. This decision point should be indicated in Figure 2-1 (previously discussed) as a SMDP. In addition, the CMS goal is to present RGOs and the reasonable expectation that attainment of the goals is likely for the remedies analyzed.

E/A&H Response 7

The revised Figure 2-1 includes a SMDP pertaining to treatability study scoping (i.e., the need for the study, the goal, and the overall process). In regards to RGOs, E/A&H believes it is the intent of the CMS to primarily identify, evaluate and rank potential remedial options. RGOs will be site-specific negotiated clean-up goals and will prove instrumental in determining the appropriate remedial alternative(s). Sometimes, site conditions and/or the technical feasibility of the potential remedial alternative may drive the selection of an RGO.

Mr. Johnny Tapia
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Page 4

USEPA Comment 8

It is recommended that the Land Use Restriction (LUR) Model be included in this document.

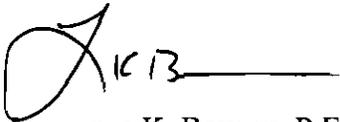
E/A&H Response 8

Concur. Though the LUR Model is not directly noted in the Comprehensive CMS PMP and WP, future land use will be considered during the identification, evaluation, and ranking of potential remedial alternatives. It is important to note that future land use is a key parameter in determining clean-up goals and objections.

Feel free to contact me at 757-766-9556 should you have any questions regarding the contents of this letter.

Sincerely,

EnSafe Inc.

A handwritten signature in black ink, appearing to read 'LKB', followed by a horizontal line.

Lawrence K. Bowers, P.E.
Senior Engineer

cc: Mr. Jay Bassett, Remedial Project Manager, Region IV, USEPA
Mr. Matthew A. Hunt, Engineer in Charge, SOUTHNAVFACENGCOM

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