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REQUEST FOR REVISION OF CORRECTIVE ACTION MANAGEMENT PLAN CNC
CHARLESTON SC
10/10/1995
CNC CHARLESTON



DEPARTMENT OF THE NAVY

CHARLESTON NAVAL SHIPYARD

CHARLESTON, S.C. 29408-6100

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18 OCT 1995

Mr. G. Randall Thompson
Director, Division of Hazardous and Infectious Waste Management
Bureau of Solid and Hazardous Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, S. C. 29201

Re: REQUEST FOR REVISION OF CORRECTIVE ACTION MANAGEMENT PLAN
FOR NAVAL BASE CHARLESTON

Ref: (a) SCDHEC letter dated 6 July 1995
(b) SCDHEC letter dated 9 September 1995

Encl: (1) Corrective Action Management Plan for Naval Base Charleston, Revision 02

Dear Mr. Thompson:

Charleston Naval Shipyard (CNSY) is conducting the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) of Naval Base Charleston. This RFI meets the requirements of the RCRA Part B permit which was issued to CNSY by the South Carolina Department of Health and Environmental Control (SCDHEC) and the United States Environmental Protection Agency (EPA) for the management of hazardous waste at Naval Base Charleston. As a condition of the RCRA permit, a Corrective Action Management Plan (CAMP) was developed to satisfy the planned reporting requirements of Appendix C of the permit. The original CAMP was approved and issued in August 1994, with a subsequent Revision 01 issued in April 1995. The purpose of this letter is to submit Revision 02 of the CAMP and obtain SCDHEC approval of the revised regulatory compliance dates on accomplishment of the RFI at Naval Base Charleston.

In 1993, while developing the approach for conducting the RFI, Naval Base Charleston was selected for closure under the Base Closure and Realignment Act of 1993 (BRAC III). BRAC III required the strategy for the RFI to be evaluated for accomplishment of the investigation of potential environmental contamination as well as taking into consideration base closure procedures and community reuse of the property. The creation of twelve specific geographical "zones" provided a manageable approach to planning, investigating and reporting for the RFI while supporting the closure and community reuse priorities. The Department of Defense (DoD) established goals to clean up closing bases expeditiously to allow for the transfer of property to the local community for economic redevelopment. The original issue of the CAMP, which was

approved by SCDHEC and EPA in August 1994, provided an aggressive schedule to meet these goals based on no budgetary restraints. The CAMP provided regulatory compliance dates through the RFI report and identified anticipated dates through the Corrective Measures Study.

Revision 01 to the CAMP, approved in May 1995, provided an update to the regulatory compliance dates based on the best information available at the time. Since approval of Revision 01, several issues have necessitated re-evaluation of the present dates which shows that several dates associated with the zone investigations will not be met. These issues are: (1) several zones have not received funding anticipated for the preparation of work plans or field work implementation; (2) based on experience obtained in preparation of the Zone H RFI report, the time allowed for development of the zone RFI reports is not adequate; and (3) several approved extensions and review durations have caused subsequent actions to be past due. The major impact on the Revision 01 CAMP schedule is the reduction of funding to support the RFI. These issues are discussed in more detail below.

During preparation of Revision 01 to the CAMP, dates and durations were established based on anticipated funding which had been requested in the budget submittals. Funding for the RFI at Naval Base Charleston as well as for eight other closing bases under BRAC III is controlled locally by Southern Division Naval Facilities Engineering Command (SOUTHDIV). SOUTHDIV identified budgetary requirements to Naval Facilities Engineering Command Headquarters (NAVFAC) which establishes the overall budgetary requirements for all Navy BRAC III bases. These requirements are submitted to the Secretary of the Navy who reviews all requirements and allocates funds based on the controls established by the Comptroller of the Navy to be consistent with the President's budget for each fiscal year. Since funding requirements for the Department of the Navy exceeded what was allocated for fiscal year 1995, by the third quarter of the fiscal year the Department of the Navy's portion of the appropriated BRAC III funds were nearly exhausted. Funding was pursued from other DoD agencies such as the Army and Air Force; this was ultimately unsuccessful and did not provide any additional funding for fiscal year 1995. This has made it apparent that the approach to base closure has shifted from a "fast track" approach with no basis for funding availability to an approach based on priorities for utilization of available funds. This change in direction has not only affected work at Naval Base Charleston and the other BRAC III bases under SOUTHDIV, but has impacted all twenty two BRAC III bases under NAVFAC.

To support continued needs at all twenty two BRAC III bases, NAVFAC implemented a Secretary of the Navy prioritization strategy for distribution of the limited funds for fiscal year 1996 and beyond. Prioritization is based on the following considerations:

- Environmental cleanup work that impacts reuse
- Supporting actions not funded in previous fiscal years
- Established long term monitoring/long term operations for environmental cleanup
- Preparation of Environmental Baseline Surveys to support property transfer
- Continued preparation and updates to the BRAC Cleanup Plans
- Nominal site characterizations
- Allowing some environmental work to continue at all bases

- Human and ecological risk considerations
- Consensus of communities to adopted reuse plans
- Input from BRAC Cleanup Teams in acquisition planning and prioritization

Also considered but as a lower priority is Federal agency to Federal agency property transfers.

As a result of the prioritization process, SOUTHDIV was allocated \$26.1 million for fiscal year 1996 to be distributed among nine BRAC III bases, of which \$9.6 million has been designated for use at Naval Base Charleston. Funded projects for fiscal year 1996 include:

- Completion of the Zone E investigation through the Corrective Measures Study
- Continued preparation of Finding of Suitability to Lease (FOSLs) for community reuse
- Management and disposal of Investigative Derived Waste (IDW)
- Development of a Tank Management Plan
- Continued asbestos surveys
- Preparation of a Petroleum Remediation Plan
- Underground storage tank removals
- Voluntary interim measures for designated solid waste management units (SWMU) and areas of concern (AOC)

Even with the disproportionate allocation of the fiscal year 1996 funds to Naval Base Charleston, there was still a \$7.5 million deficit for completing all RFI actions as specified in Revision 01 to the CAMP.

SOUTHDIV and CNSY have continued to pursue means for obtaining additional funds to lessen the impact of the limited appropriations. As a result, funds have been able to be shifted and absorbed by existing budgets for funded zones where obligations have not been completely used. Also, cost savings are being realized in accomplishment of field work using innovative approaches and in decreased costs for analytical services due to market conditions. This has resulted in a \$3 million savings which has been used to fund previously unfunded work, including the Zones D, F, and G workplan preparations, and the Zones J and L field work implementation. Even though funds have been identified for this work, due to the late contract awards, these zones will not meet the Revision 01 CAMP dates. Below are the resulting changes due to the lack or late identification of funds:

Zone	Impacted Actions	Revision 01 CAMP Date	Proposed Date Change
D	Workplan submittal	27 October 1995	14 December 1995
D	Field work implementation	27 November 1995	1 October 1996
F	Workplan submittal	27 October 1995	14 December 1995
F	Field work implementation	27 November 1995	1 October 1996
G	Workplan submittal	27 October 1995	14 December 1995
G	Field work implementation	27 November 1995	1 October 1996
J	Field work implementation	7 August 1995	1 December 1995
K	Workplan submittal	24 October 1995	27 December 1996
K	Field work implementation	22 November 1995	26 January 1997
L	Field work implementation	26 June 1995	1 December 1995

Additional cost savings and other means of funding are being explored to fund the remaining \$4.5 million of work in fiscal year 1996. Any work not funded in fiscal year 1996 will be deferred until fiscal year 1997.

The CAMP is also being revised to reflect several approved extensions and to reflect the resulting dates from extended and multiple reviews. Actual start dates for Zones A, B, and E are not reflected in the present CAMP. These dates have changed due to approved extensions for the preparation of the workplans as well as to allow necessary time for additional regulatory reviews. In order to allow sufficient time to adequately complete field work, each zone schedule has been revised to reflect actual start dates and the resulting follow-on event dates maintaining the durations as previously approved or requested to be changed by this letter.

The durations for the required field work and report generation in the CAMP were estimated based on past experience, which had not included projects of base closure magnitude and complexity. As a result of the Draft Zone H RFI report submittal, it has been determined that the durations for preparation of the RFI reports are not sufficient. Although work can begin on the report prior to completion of field investigation, the main body of the report can not begin until final data is received from sample analysis. Therefore the report preparation duration really begins at the time data is received. As indicated in Appendix C of the RCRA permit, the draft RFI report is required within 90 days after completion of the RFI. As seen with the Draft Zone H RFI report, this duration was not adequate, even with a 30 day extension, to provide a complete report. CNSY considers that it is as important to provide a complete quality report as it is to meet the required submittal dates. CNSY has reviewed each zone on a basis of magnitude and complexity, and has made a determination on the necessary durations. This determination resulted in changes only to Zones C and I which have been incorporated in enclosure (1).

References (a) and (b) requested extensions for submittal of the Zone H RFI report and the Zone L RFI workplan respectively. SCDHEC approved the extension to the Zone H RFI report. The Zone L RFI workplan extension was disapproved with the requirement that an approvable workplan must be submitted by 18 October 1995. In both responses, SCDHEC stressed that future extension and schedule change requests would not be granted unless justified by extenuating circumstances. This letter submits a revised CAMP for the RFI at Naval Base Charleston. The schedule changes and extensions requested are mainly due to nonfunded or late funded projects. Funding for all Federal activities is being reduced which is outside of CNSY and SOUTHDIIV control. CNSY and SOUTHDIIV are continuing to look for ways to lessen the impact from this reduced funding, but as shown in the changes to the CAMP in enclosure (1) do not anticipate any relief.

SCDHEC's approval is requested on Revision 02 of the CAMP as presented in enclosure (1) based on the justification provided. If there are any questions or additional information is required, we are available to meet with you and your staff. The CNSY point of contact is Amos Webb at (803) 743-5519.

Sincerely,



W. F. NOLD
Captain USN
Commander
Charleston Naval Shipyard

Copy to:
NAVSEA 07, Peggy Bianco
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