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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL REVIEW OF DRAFT ENVIRONMENTAL BASELINE SURVEY
FOR LEASE (EBSL) AND DRAFT FINDING OF SUITABILITY TO LEASE (FOSL) REVISION 0
DATED OCTOBER 1999 FOR FORMER BUILDINGS NS-2 AND NS-3
03/21/2000
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2600 Bull Street
Columbia, SC 29201-1708

COMMISSIONER: March 21, 2000
Douglas E. Bryant

BOARD: Henry Shepard II, P.E.
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Chairman Caretaker Site Office

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P. O. Box 190010
North Charleston, SC 29419-9010

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Re: Draft Environmental Baseline Survey for Lease (EBSL) and Draft Finding of Suitability to Lease (FOSL) for Site of Former Buildings NS-2 and NS-3 and Facility NS-4, Charleston Naval Complex, SCO 170 022 560, Revision 0, dated October, 1999.

Dear Mr. Shepard:

The South Carolina Department of Health and Environmental Control (Department) has reviewed the above referenced document according to applicable State and Federal Regulations, and the Charleston Naval Complex Hazardous Waste Permit, effective September 17, 1999. The attached comments were generated based on a review of the information provided in the EBSL and the FOSL. The Department would be receptive to a comment resolution meeting.

Should you have any questions regarding this comments, please contact Mihir Mehta at (803) 896-4088 or Paul Bergstrand at (803) 896-4016.

Sincerely,

Ann Clark
Federal Facility Liaison
EQC Administration

Attachment

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Water Monitoring, Assessment &
Protection Division

South Carolina Department of Health and Environmental Control comments on: Draft Environmental Baseline Survey for Lease (EBSL) and Draft Finding of Suitability to Lease (FOSL) for Site of Former Buildings NS-2 and NS-3 and Facility NS-4, Charleston Naval Complex, SCO 170 022 560, Revision 0, dated October, 1999.

Comments By Mihir Mehta:

1. Executive Summary; page v.
The Department of the Navy intends to lease the property in the former location of Buildings NS-2, NS-3, and Facility NS-4 for unrestricted use. This statement is misleading or contradicting with the text in the Section 7.2 "Recommended Use Restriction" of the referenced document. The land use selection (residential, industrial, recreational..etc) is based on risk/hazard posed by the residual contamination or clean up goals selected for that particular site. Please revise the text in all pertinent sections to be consistent with the anticipated land use that has been agreed upon by all parties.
2. Executive Summary; page vi.
Please provide the exact dates of the site visit that took place based on which the environmental findings are stated.
3. Section 1.3; Boundary/Properties Identification; page 1-3.
One line for this section states that, "A real property survey will be conducted to delineate the property boundaries prior to lease." The Department can not approve the referenced document when the land to be leased is not delineated nor surveyed. Please suggest an adequate approach to address this comment.
4. Section 3.0; Past and Current Operations; page 3-1.
This section provides no information regarding the past use/operation of the property to be leased. It only provides the dates when the buildings were constructed and abandoned. Based on the information provided herein the Department can not approve the referenced document. One of the criteria for identifying the "uncontaminated parcel of land" per EPA guidance is to have a complete understanding of its past operation or use. Therefore, please provide a detail discussion for the operation of the buildings and spills or accidents that may have temporary released contaminants into the surrounding media. Also, provided the dates when the buildings were demolished.
5. Figure 3-1; Former NS-2, NS-3, and NS-4 Parcels
The figure should be revised to illustrate the location of this parcel with respect to other physical features, landmarks, and its relation/vicinity with other zones, SWMU, and AOC.
6. Section 4.0; Environmental Setting; page 4-1.
Please provide a map or a figure that illustrates the environmental setting and features that are associated with this parcel of land to be leased.

13. Section 5.17; Lead in Drinking Water; page 5-6.
It states that, "No source of drinking water are present at the subject property." This does not provide adequate information to establish whether lead is present in water and at what concentration. Prediction of future groundwater use or control of groundwater movement is not feasible and therefore, please additional information to address this concern.
14. Section 6.0; Findings for Adjacent Property; page 6-1.
This section does not present any information that would help understand the risk associated with the adjacent property and how does it relate the subject property. Please revise this section to include adequate information regarding the risk, hazard, or other issues related to adjacent property as deemed appropriate.
15. Section 7.2; Recommended Use Restrictions; page 7-1.
Restriction # 1. Please elaborate what constitutes as an industrial storage and what are the related support activities. Please be more precise as to the use of the property.
Restriction # 2. It states that the lessee shall not do.....without prior Government approval. Please explain what agencies of the Government are required to approve any future land use proposal.
Please revise this section to address these concerns.
16. Please add language to Section 7.0 to explain current and future land lease and transfer process as it pertains to the subject property. This will help develop a complete picture of the process and the Departments role in the process.

Comments by Paul Bergstrand

1. Chapter 3, Figure 3-1. This Figure indicates NS-4 is where an oil water separator and the associated UST are located. The OWS and UST have been identified as NS-2A. The UST NS-2A was registered with DHEC as #17595 and was removed by excavation according to a removal report submitted to the Department on 29 August 1996. That removal report documented soil and groundwater contamination which required additional assessment. It must be noted the excavation confirmation sampling was for a limited range of analytes and not for the full suite of potential contaminants. The Navy should conduct the additional assessment for the full suite of potential contaminants before the Department can concur with this lease proposal.

NS-4 is identified in the RFA as AOC 675, a 25,000 gallon UST installed in 1952 to refuel seaplanes. The UST was converted to store fuel oil in 1958 when the boiler NS-2 was constructed. The fuel oil UST was registered with DHEC as #17595 and was removed by excavation according to a removal report submitted to the Department on 3 February 1997. That removal report documented soil and groundwater contamination which required additional assessment. The Navy should conduct the additional assessment before the Department can concur with this lease proposal.

generated at these former buildings.” This statement conflicts with the June 1995 RFA Report and the March 1999 RFI Report which state that the “sump pump for the boilers discharged to the base storm sewer system. After 1979, the sump pump discharged to the sanitary sewer system via an oil/water separator.” This section should be corrected.

7. Chapter 6, Findings for Adjacent Property

This section does not specifically reference UST sites which were not identified as SWMUs or AOCs in the RCRA RFA process. The UST sites not identified as SWMUs or AOCs should be included in this section.

8. Chapter 6, Page 6-3

The description of the Current Status column for AOCs 678, 679, 680, and 681 is not correct. The latest RFI Zone I RFI Report is dated March 1999 and the comments from DHEC are dated 7 May 1999. This description should be corrected.

9. Section 7.1, Page 7-1

This section states “According to a review of all reasonably available information, the parcels where former Buildings NS-2, NS-3, and NS-4 were located have been categorized as 2-Blue under the DoD Environmental Condition of Property Classifications previously discussed in Section 2.4 of this report. This classification is indicative of areas where only release or disposal of petroleum products has occurred.” This definition of 2-Blue is contradicted in Appendix A which states “2-Blue: Areas where only storage of hazardous substances or petroleum products has occurred (but no release, disposal, or migration from adjacent areas has occurred).” The Zone I RFI Report dated March 1999 clearly states that free product was detected in monitoring well 675001. The extent of the free product has not been determined. Furthermore, analysis of the free product indicated chloroform was present. Chloroform is a daughter product of carbon tetrachloride, a chlorinated solvent. The Condition of Property Classification for NS-2, NS-3 and NS-4 should be revised to Red or Yellow. The Navy should determine the full nature and extent of all contaminants at this property before the Department can concur with this lease proposal.

10. Section 7.3, Page 7-6

The recommendation for no further environmental action should be postponed pending the determination of the full nature and extent of all contaminants at this property by the Navy.