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LETTER TRANSMITTING COMMENTS ON CHANGES TO FINAL RESOURCE
CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION WORK PLAN ZONES C
AND I DATED 24 JANUARY 1996 CNC CHARLESTON SC
3/19/1996
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

South Carolina
DHEC

Department of Health and Environmental Control
2600 Bull Street, Columbia, SC 29201-1708

Commissioner: Douglas E. Bryant

Board: John H. Burriss, Chairman
William M. Hull, Jr., MD, Vice Chairman
Roger Leaks, Jr., Secretary

Promoting Health, Protecting the Environment

2903-07150

2909-07150

Richard E. Jabbour, DDS
Cyndi C. Mosteller
Brian K. Smith
Rodney L. Grandy

03/19/96 ✓

CERTIFIED MAIL

March 19, 1996

Captain William F. Nold
Commanding Officer
Charleston Naval Shipyard
Charleston, SC 29408-5100

Re: RCRA Facility Investigation
Zones C & I Workplan Changes
Dated January 24, 1996
Charleston Naval Shipyard
SCO 170 022 560

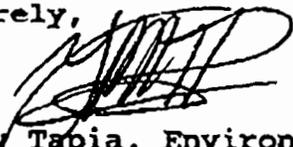
Dear Captain Nold:

The South Carolina Department of Health and Environmental Control (Department) has reviewed the above referenced document in accordance with applicable State and Federal Regulations, and the Charleston Naval Shipyard's Hazardous Waste Permit, effective June 5, 1990. Based on this review the Department has generated the attached comments.

The attached comments were provided by the Hydrogeology section (Memo Bowers to Tapia dated March 7, 1996). These comments may be addressed by submitting revised pages with filing instructions. If the revisions are approved, the revised pages will be inserted into the original document.

Should you have any questions regarding this issue, please contact me at (803) 896-4182 or Joe Bowers at (803) 896-4024.

Sincerely,


Johnny Tapia, Environmental Engineer Associate
Hazardous Waste Permitting Section
Bureau of Solid & Hazardous Waste Management

Attachments

cc: Joe Bowers, Hydrogeology
Rick Richter, Trident EQC
Bobby Dearhart, COMNAVBASE
Tony Hunt, SOUTHNAVFACENGNCOM
Doyle Brittain, EPA Region IV

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Board: John H. Burries, Chairman
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Promoting Health. Protecting the Environment

MEMORANDUM

TO: Johnny Tapia, Environmental Engineering Associate
Hazardous Waste Permitting Section
Division of Hazardous and Infectious Waste Management
Bureau of Solid and Hazardous Waste Management

FROM: Joe B. Bowers, Hydrogeologist *SB*
Hazardous Waste Section
Division of Hydrogeology
Bureau of Solid and Hazardous Waste Management

DATE: March 7, 1996

RE: Charleston Naval Base and Shipyard (NAVBASE)
SC0 170 022 560
Charleston County

Review of Proposed Revisions to the

- Final Zone C RCRA Facility Investigation Work Plan (dated 2/24/95)
- Final Zone I RCRA Facility Investigation Work Plan (dated 2/24/95),
(Lancy to Thompson, 1/24/96)

The proposed revisions to the above referenced RFI Workplans have been reviewed with respect to the requirements of R.61-79.264 Subpart F of the South Carolina Hazardous Waste Management Regulations (SCHWMRs), as amended, Hazardous Waste Permit SC0 170 022 560, and appropriate guidance documents, including the RCRA Facility Investigation Guidance (EPA 530/SW-89-031, dated May 1989) and Environmental Compliance Branch Standard Operating Procedures and Quality Assurance Manual, dated February 1, 1991. The Final Zone C RCRA Facility Investigation Work Plan and the Final Zone I RCRA Facility Investigation Work Plan have been approved by the Department. Areas of Concern (AOCs) 522 and 700 were inadvertently omitted from the Final Zone C RFI Work Plan, while SWMU 177 was inadvertently omitted from the Final Zone I RFI Work Plan, necessitating these revisions. Below, please find comments generated from review of the proposed revisions to the approved workplans.

Zone C RFI Work Plan

1. Pages 2-25, 2-32, and 2-34 are included in the page changes for the Zone C RFI Work Plan, however the table describing the reasons for the revisions does not provide a reason for revising these pages. The reasons for revision of pages 2-25, 2-32, 2-38 should be included in this table.
2. It is stated on page 2-60 of the proposed revisions that "The underground utility system will be investigation in the Zone L work plan." This statement is misleading. Zone L consists of the sewer and railroad systems on the base, it does not include all underground utilities, such as underground electrical lines, etc. This statement should be clarified.
3. In Section 2.7.7 (Sampling and Analysis Plan), it is stated: "The number of samples and sample locations for the above-listed AOCs...". It is unclear to which "above-listed AOCs" this sentence applies. This section of the Zone C RFI Work Plan applies only to AOC 522. This sentence should be corrected in the revised submittal.

Zone I RFI Work Plan

4. The word "designated" is misspelled in Section 2.12 (SWMU #177, RTC-4 Oil Spill).
5. The headings of subsections are not numbered like those in the remainder of the Zone I RFI Work Plan. For example, the heading of the section of "Previous Investigations" should be numbered "2.12.1". The proposed revisions should be revised to correct this error.

cc: Foster Coleman, Trident District Director
Christine Sanford-Coker, Trident District

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South Carolina
DHEC
 Department of Health and Environmental Control
 2600 Bull Street, Columbia, SC 29201-1708

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Promoting Health. Protecting the Environment

CERTIFIED MAIL

March 13, 1996

Captain William F. Nold
 Commanding Officer
 Charleston Naval Shipyard
 Charleston, SC 29408-5100

Re: RCRA Facility Investigation
 Zones C & I Workplan Changes
 Dated January 24, 1996
 Charleston Naval Shipyard
 SCO 170 022 560

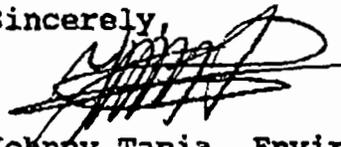
Dear Captain Nold:

The South Carolina Department of Health and Environmental Control (Department) has reviewed the above referenced document in accordance with applicable State and Federal Regulations, and the Charleston Naval Shipyard's Hazardous Waste Permit, effective June 5, 1990. Based on this review the Department has generated the attached comments.

Comments may be addressed by submitting revised pages with filing instructions. If the revisions are approved, the revised pages will be inserted into the original document according to the submitted filing instructions.

Should you have any questions regarding this issue, please contact me at (803) 896-4182 or Joe Bowers at (803) 896-4024.

Sincerely,


 Johnny Tapia, Environmental Engineer Associate
 Hazardous Waste Permitting Section
 Bureau of Solid & Hazardous Waste Management

Attachments

cc: Joe Bowers, Hydrogeology
 Rick Richter, Trident EQC
 Bobby Dearhart, COMNAVBASE
 Tony Hunt, SOUTHNAVFACENGNCOM
 Doyle Brittain, EPA Region IV

**COMMENTS ON RCRA FACILITY INVESTIGATION
ZONE C & I WORKPLAN CHANGES
DATED 01/24/96**

AOC 522: Former Grease and Wash Building

1. The location of AOC 522 has to be defined on Figure 1-1, "General AOC/SWMU Location Map," on the already approved RFI workplan for Zone C.
2. Figure 2-1 in the currently approved RFI workplan for zone C has to be updated by including the proposed sampling locations for AOC 522.
3. On page 2-59 of the proposed RFI workplan for AOC 522, the word "site" can be fitted in the previous line of that paragraph, in the interest of a good presentation.

AOC 700: Golf Course Maintenance Building

4. Same as (1), for AOC 700.
5. Same as (2), for AOC 700.
6. Since this section makes references to runoff patterns, drainage ditches and runoff accumulation areas as possible contaminant routes to Noisette Creek, the compromised area with its topographical relief should be included on figure 2-14.
7. Same as (3) on section 4.8A.

SWMU # 177: RTC-4 Oil Spill

8. Take precautions to include the location of SWMU # 177 on the appropriate map. An updated map with the locations of AOCs and SWMUs should be submitted.
9. The text on page 2-84 makes reference to figure 2.12 for the soil borings sampling locations. This mentioned figure has not been included for review nor is listed on the Table of Contents (List of Figures section). The workplan should be revised accordingly.
10. Section 2.12 of the Table of Contents has not been listed in detail as all the other similar sections. Subsections of section 2.12 should be listed, following the same scheme, in the Table of Contents.
11. On the Health and Safety Plan section of the Table of Contents, the addition of SWMU # 177 as subsection 4.14A shows the intention to maintain order in the numbering of the document pages, and serve the intrinsic purpose of a "Table of Contents." If such is the purpose, the same should be done with the page numbering of this added subsection. It is recommended to change the page

numbering, starting at subsection 4.14A to the end of section 4. It should be noted that if the page numbering changes, as recommended, tables 4.21A and 4.21B should be re-enumerated accordingly and appropriate changes to the List of Tables should be made as well.

12. Section 4.14A on page 4-50a, in the Site Activities Section, refers back to section 2.12A. There is no such section in the workplan. On the same page, next to the previously mentioned paragraph, is made reference to table 4-22B. This should be table 4-21B instead.
13. Table 4-21B, "Exposure Guidelines for Expected Site," does not refer to SWMU # 177. Instead it refers to the guidelines for SWMUs 672 & 673, or else this header is mistaken. The same mistake is repeated in the Table of Contents. The proposed workplan for SWMU # 177 should be revised accordingly.

**RESPONSE TO
SOUTH CAROLINA DEPARTMENT OF HEALTH
AND ENVIRONMENTAL CONTROL
COMMENTS FOR THE
RCRA FACILITY INVESTIGATION (RFI) ZONE C & I WORK PLAN
CHANGES (DATED 1/24/96)
March 7, 1996**

AOC 522: Former Grease and Wash Building

Comment 1:

The location of AOC 522 has to be defined on Figure 1-1, "General AOC/SWMU location map," on the already approved RFI workplan for zone C.

Response 1:

AOC 522 has been included on Figure 1-1.

Comment 2:

Figure 2-1 in the currently approved RFI workplan for zone C has to be updated by including the proposed sampling locations for AOC 522.

Response 2:

Figure 2-1 has been updated to include the proposed sampling locations for AOC 522.

Comment 3:

On page 2-59 of the proposed RFI workplan for AOC 522, the word "site" can be fitted in the previous line of that paragraph, in the interest of a good presentation.

Response 3:

On Page 2-59 the word "site" has been added to the previous line in the interest of a good presentation.

*These are our responses
contained in package sent
to DHEC on the 15th April*

Response to Comments
S.C. Department of Health and Environmental Control
RFI Zone C & I Work Plan (Dated 1/24/96)
March 7, 1996

AOC 700: Golf Course Maintenance Building

Comment 4:

Same as (1), for AOC 700.

Response 4:

AOC 700 has been included on Figure 1-1.

Comment 5:

Same as (2), for AOC 700.

Response 5:

Figure 2-1 has been updated to include the proposed sampling locations for AOC 700.

Comment 6:

Since this section makes reference to runoff patterns, drainage ditches and runoff accumulation areas as possible contaminant routes to Noisette Creek, the compromised area with its topographical relief should be included on figure 2-14.

Response 6:

Figure 2-14 has been updated to indicate topographical relief.

Comment 7:

Same as (3) on section 4.8A.

Response 7:

The word "site" has been added to the previous line in the interest of a good presentation.

Response to Comments
S.C. Department of Health and Environmental Control
RFI Zone C & I Work Plan (Dated 1/24/96)
March 7, 1996

SWMU #177: RTC-4 Oil Spill

Comment 8:

Take precautions to include the location of SWMU #177 on the appropriate map. An updated map with the locations of AOCs and SWMUs should be submitted.

Response 8:

Figure 1-1 has been updated to indicate the location of SWMU 177.

Comment 9:

The text on page 2-84 makes reference to figure 2.12 for the soil borings sampling locations. This mentioned figure has not been included for review nor is listed on the Table of Contents (List of Figures section). The workplan should be revised accordingly.

Response 9:

Figure 2.12 has been included in this submission.

Comment 10:

Section 2.12 of the Table of Contents has not been listed in detail as all the other similar sections. Subsections of section 2.12 should be listed, following the same scheme, in the Table of Contents.

Response 10:

The Table of Contents has been updated to include consistent subsection numbering details.

Comment 11:

On the Health and Safety Plan section of the Table of Contents, the addition of SWMU #177 as subsection 4.14A shows the intention to maintain order in the numbering of the document pages, and serve the intrinsic purpose of a "Table of Contents." If such is the purpose, the same should be done with the page numbering of this added subsection. It is recommended to change the page numbering starting at subsection 4.14A to the end of section 4. It should be noted that

Response to Comments
S.C. Department of Health and Environmental Control
RFI Zone C & I Work Plan (Dated 1/24/96)
March 7, 1996

if the page numbering changes, as recommended, tables 4.21A and 4.21B should be re-enumerated accordingly and appropriate changes to the List of Tables should be made as well.

Response 11:

As recommended, all subsequent page, subsection, and table numbering to the added section for SWMU 177 has been changed. In addition, all references to these "changed" sections and tables has been changed.

Comment 12:

Section 4.14A on page 4.50a, in the Site Activities Section, refers back to section 2.12A. There is no such section in the workplan. On the same page, next to the previously mentioned paragraph, is made reference to table 4-22B. This should be table 4.21B instead.

Response 12:

The referenced section and table number has been corrected.

Comment 13:

Table 4-21B, "Exposure Guidelines for Expected Site," does not refer to SWMU #177. Instead it refers to the guidelines for SWMUs 672 & 673, or else this header is mistaken. The same mistake is repeated in the Table of Contents. The proposed workplan for SWMU #177 should be revised accordingly.

Response 13:

The table header has been corrected to read "SWMU 177" instead of SWMUs 672 and 673.