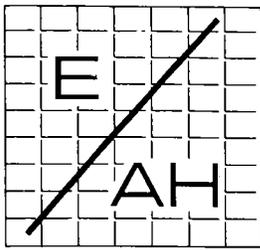


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LETTER TRANSMITTING FINAL RESOURCE CONSERVATION AND RECOVERY ACT  
FACILITY WORK PLAN ZONE L CNC CHARLESTON SC  
12/30/1996  
ENSAFE/ ALLEN AND HOSHALL



# EnSafe / Allen & Hoshall

a joint venture for professional services

30 December 1996

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Mr. G. Randall Thompson  
Director, Division of Hazardous and Infectious Waste Management  
Bureau of Solid and Hazardous Waste Management  
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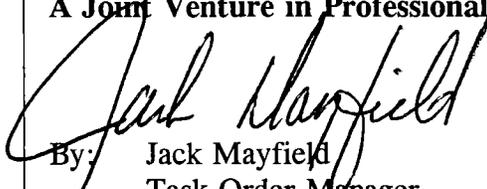
**Re: Distribution of *Final Zone L RFI Work Plan*  
Naval Base Charleston, Charleston, South Carolina**

Dear Mr. Thompson:

At the direction of the Southern Division Naval Facilities Engineering Command (SOUTHNAVFACENGCOM), EnSafe/Allen & Hoshall (E/A&H) is completing distribution of the *Final Zone L RFI Work Plan* dated 27 November 1996. The minor changes were made per verbal and written communication with SCDHEC and EPA representatives on the Naval Base Charleston project team. Approval of the changes was granted per letter from SCDHEC dated 13 December 1996 and the document is now considered "final". Please find enclosed one copy of the "final" document for your use.

If you have any questions or if I can be of assistance please do not hesitate to contact Mr. Tony Hunt of SOUTHNAVFACENGCOM at (803)820-5525 or call me at (803)884-0029.

Sincerely,  
**EnSafe/Allen & Hoshall**  
**A Joint Venture in Professional Services**

  
By: Jack Mayfield  
Task Order Manager

**Attachments:**

cc: CTO-029 Project File, 2912-07150  
SOUTHNAVFACENGCOM (Hunt)  
SCDHEC (Bergstrand, Tapia)  
USEPA (Brittain)  
CSO (Crawford)

**RESPONSE TO COMMENTS**  
**SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL**  
**CONTROL (SCDHEC) ON THE DRAFT ZONE L RCRA FACILITY**  
**INVESTIGATION WORK PLAN DATED July 24, 1996.**  
**CHARLESTON NAVAL BASE**  
**CHARLESTON, SOUTH CAROLINA**

Comment 1:

Comment # 20 related to the inclusion of locations of abandoned sections of railroad lines, was answered as if Figure 2-10 had been revised to include such locations. From the review of this figure, it was found that Figure 2-10 relates to Oil-Water Separators and Septic Tanks. Although this error has no relevance in the overall response to comments it should be avoided in future responses.

**Response 1:**

**Response to Comment # 20 should have read, "Figures 2-27 to 2-29 have been revised to include abandoned rail lines and spurs." Efforts will be made to avoid these minor errors in the future. No modification to the work plan was necessary per this comment.**

Comment 2:

The same type of error described in Comment # 1, was found on the response to Comment # 11. Building 675 is identified as located on Figure 2-8, however this building is located on Figure 2-9. Again, NAVBASE does not need to respond to this comment, just avoid these mistakes in the future.

**Response 2:**

**Response to Comment # 11 should have referenced Figure 2-9 as opposed to Figure 2-8. Efforts will be made to avoid these minor errors in the future. No modification to the work plan was necessary per this comment.**

Comment 3:

The Report of the interim measure work performed at AOC 690 gives notice of an unrecorded drain outfall located besides the West Road section of AOC 690 that discharges into Shipyard Creek. The Report states that these drain outfall could be connected with a series of storm drains located on the parking lot of Building 677. The Report additionally states that neither drain outfall nor storm drains related to Building 677 have been recorded in the Zone L RFI Work Plan.

The Zone L RFI Work Plan should be modified to include these information and propose additional investigation if necessary.

**Response 3:**

**An intent of the Zone L RFI Work Plan is to investigate sections of the sanitary and storm sewer systems which are or have been associated with or downgradient of facilities identified as Industrial Sources or Potential Sources of Contaminants. Following the criteria specified in the Zone L RFI Work Plan, Building 677 was not identified as either an “industrial source” or a “potential source”, it was omitted from list of facilities in Appendix C, *Facility Matrix for Industrial Sources*, or Appendix D, *Facility Matrix for Potential Sources of Contaminants*. No investigative actions are recommended for the sanitary and/or storm sewer lines associated with Building 677 under the guidance of the Zone L RFI Work Plan.**

**Comment 4:**

The first bullet on page 2-37 indicates that AOC 504-AB is being investigated as part of Zone F. It is also stated that because the investigation proposed for AOC 619 (in Zone F) includes AOC 504-AB, no additional samples are proposed for AOC 504-AB under the Zone L RFI Work Plan. However, Figure 2-13 shows sampling points (soil borings and shallow monitoring wells) proposed as part of Zone L RFI Work Plan. Figure 2-13 and the text on page 2-37 do not agree. Please revise the above to clarify the discrepancy.

**Response 4:**

**The text on Page 2-37 will be modified, as necessary, to ensure that the verbiage agrees with the proposed sampling scheme indicated on Figure 2-13.**

**Comment 5:**

Section 2.4.4, Sampling and Analysis Plan, second paragraph, page 2-63: This section of the Zone L RFI Work Plan is supposed to be related to the Storm Sewer System, however the text of the second paragraph reads “ the primary pathway of contamination from the **Sanitary Sewer System** is exfiltration...”. Please correct this paragraph to relate the text to the Storm Sewer System.

**Response 5:**

**Section 2.4.4, Sampling and Analysis Plan, second paragraph, page 2-63 will be modified to state “...the primary pathway of contamination from the *Storm Sewer System* is exfiltration...”.**

**Comment 6:**

Oil Water Separators (OWS) will be considered for the study of the Sanitary and Storm Sewer System. Currently is not known if OWS are connected to the Sanitary or the Storm Sewer System. This has been identified as one of the Data Gaps that needs to be resolved for an appropriate characterization of Zone L. Some areas at NAVBASE are going through Interim Measures and as they move forward some information collected could be useful in filling previously identified Data Gaps. As an example, SWMU 13 (Firefighter Training Area), has been proposed for IM. Two OWS are related to the site. One of the steps of the proposed IM will be the identification of all underground utilities before commencing soil removal work. Information obtained from this step could be used for the preparation of Zone L RFI Report.

**Response 6:**

**It is agreed that some information derived during the Interim Measures process, as well as any other investigations at NAVBASE Charleston, may be beneficial in the preparation of the Zone L RFI Report. Therefore, communications between the investigative parties and EnSafe/Allen & Hoshall will be required to ensure that all relevant information is accessible. No modification to the work plan was necessary per this comment.**

**RESPONSE TO COMMENTS**  
**PAUL BERGSTRAND SOUTH CAROLINA DEPARTMENT OF HEALTH AND**  
**ENVIRONMENTAL CONTROL (SCDHEC) ON THE DRAFT ZONE L RCRA**  
**FACILITY INVESTIGATION WORK PLAN dated July 24, 1996.**

Comment 1:

Review of Section 3: Site Specific Health and Safety Plan is deferred to EPA.

**Response 1:**

**No modification to the work plan was necessary per this comment.**

Comment 2:

Page 2-30 This section and the diagram on the following page describes a fixed process of sampling oil water separators (OWS) and septic systems. The goal should be to sample the site or unit to best determine if a release has occurred. The process should consider groundwater flow also. The sampling protocol should be modified such that the monitoring well is placed downgradient of the unit. Furthermore, there is a concern that a monitoring well placed in the septic drain field may damage or destroy the drain field. The septic tank drain field sample locations may be modified based on conversation with Southern Division Staff.

**Response 2:**

**The text on Page 2-30 will be modified to incorporate the above comments on the OWSs and the septic fields. The modified text shall include that the actual location of the proposed monitor well at each OWS (Figure 2-10) is dependent upon the direction of the groundwater flow; therefore one will be placed downgradient of each OWS unit.**

**Additionally, the text concerning the septic fields will be modified to state the actual location of the proposed monitor well will be outside the perimeter of the septic field and downgradient of the groundwater flow.**

Comment 3:

Figures E-1 and E-2 These figures are somewhat mislabeled. The hachured areas indicate the areas served by OWS and septic systems and not the units themselves. It is not necessary to revise this document, however the monitoring well requests and the final document should reflect the actual site or unit.

**Response 3:**

**A drawing indicating the location, not the general area, of the OWSs and the septic fields in relation to the servicing facilities will be submitted with the monitoring well permit application and the Zone L RFI Report. No modification to the work plan was necessary per this comment.**