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RESPONSE TO SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL
CONTROL COMMENTS ON RESOURCE CONSERVATION AND RECOVERY ACT FACILITY
INVESTIGATION WORK PLAN ZONE E CNC CHARLESTON SC

6/29/1995

ENSAFE/ ALLEN AND HOSHALL

**COMPREHENSIVE LONG-TERM
ENVIRONMENTAL ACTION NAVY
NAVAL BASE CHARLESTON, SOUTH CAROLINA
CTO-029**

**RCRA FACILITY INVESTIGATION (RFI)
ZONE E WORK PLAN
RESPONSE TO REGULATORY COMMENTS**



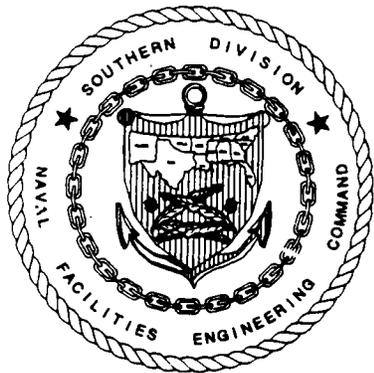
Prepared for:

**DEPARTMENT OF THE NAVY
SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
CHARLESTON, SOUTH CAROLINA**

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Prepared by:

**ENSAFE/ALLEN & HOSHALL
5720 SUMMER TREES DRIVE, SUITE 8
MEMPHIS, TENNESSEE 38134
(901) 383-9115**



June 29, 1995

RESPONSE TO COMMENTS
South Carolina DHEC
For Draft Final Zone E RFI Workplan
June 29, 1995

Comment:

1. It was noted in my previous memorandum (Bowers to Walton, 4/21/95) that the extent of contamination in soil and groundwater would have to be compared to background concentrations. In response, NAVBASE noted that a memorandum outlining several methods for determining background concentrations would be transmitted to the Department for review. However, the point of this comment was to state to NAVBASE that the Department requires assessment of the extent of contamination to be compared to base-specific background concentrations.

Response:

The Navy acknowledges receipt of this document.

Comment:

2. In comment 1 of my previous review, information was requested concerning the quaywall located at NAVBASE. As discussed during the meeting held at the EnSafe offices in Charleston on May 25, 1995, the Navy will provide this information to the Department. This information should be submitted on or about August 1, 1995.

Response:

The Navy is researching the information available concerning the construction of the quaywall and will forward this information to SCDHEC as soon as practicable.

RESPONSE TO COMMENTS
EPA
For Draft Final Zone E RFI Workplan

Comment:

1. EPA's April 20, 1995, Comment 2 identified the need for procedures for use of the mercury vapor detector and the high volume air sampler. Naval Base Charleston committed to include these in the Zone E Work Plan. These procedures are missing from the Zone E Work Plan. These procedures are needed. EPA will not use data collected by procedures not included in an approved RFI Work Plan.

Response:

Section 2.4.4 of the work plan has been revised to include a reference to an attachment to the plan which outlines instrument operating procedures for a mercury vapor detector. Section 2.11.4 of the work plan has been revised to include a reference to procedures for operating a PM₁₀ station. Both sets of procedures will be submitted as part of the plan.

Comment:

2. EPA's April 20, 1995, Comment 18 identified the need for mercury sampling underneath the floor. This is a comment that EPA has made previously, but Naval Base Charleston has still not taken seriously. EPA is still concerned about the report of an opening in the floor where mercury was stored (and spilled) for a number of years. EPA wants the same sampling strategy at this building as proposed for Building 13A; the strategy does not need to contain the same number of samples per square foot as Building 13A but should contain the same general approach. EPA is not going to be satisfied that the property is sufficiently clean for transfer pending such an investigation.

Response:

As previously discussed during the May 25, 1995 meeting to discuss the comments, soil samples are proposed to be collected under the floor as indicated on Figure 2-07.

Comment:

3. Page 2-41, Section 2.8.4, second paragraph. This paragraph is confusing. Paraphrased, EPA's interpretation is "A mercury vapor detector will be used in lieu of using EPA's procedures." Is this the interpretation intended? While this may be acceptable (subject to review and approval by EPA), where are the mercury procedures?

Response:

The interpretation is correct. The alternative method was proposed following the meeting hosted by USEPA in Atlanta at which time the sole purpose was to discuss mercury sampling methodologies. The procedures will be provided per response to USEPA comment 1 above.

Comment:

4. EPA's April 20, 1995, Comment 23 identified the need for soil and groundwater sampling around Building 79 similar to the strategy proposed for Building 13A. This comment has not been addressed.

Response:

The work plan has been revised to relocate two of the soil borings to the central portion of Building 79 where the mercury spill reportedly occurred. The southernmost proposed monitoring well location was changed to a soil boring location upon further review of the sampling plan for AOC 590 which already proposed a well in the immediate vicinity of the formerly proposed SWMU 102 well location. As for additional sampling outside the building, several soil borings, monitoring wells, and sediment samples have been proposed for AOC 590 which is adjacent to and outside of Building 79. AOC 590 is located just outside a doorway on the southwestern side of Building 79. The significance being the doorway has been used as a reference point by NAVBASE employees to indicate where the spill occurred. The sharing of data collection points between adjacent sites follows an overall sampling strategy concept designed to eliminate duplicative effort.

Comment:

5. EPA's April 20, 1995, Comment 24 identified the need for the sampling in this area to be expanded. In the RFA, Naval Base Charleston agreed to this expansion. However, EPA does not consider the addition of one sample to be an adequate expansion of the sampling effort. As a minimum, one additional soil boring is needed between SWMU 106 and River Road.

Response:

In the RFA, NAVBASE agreed to expand the suspected site boundary of SWMU 106. Figure 2-15 has been revised to agree with the boundary depicted in the RFA. In addition, two soil borings have been proposed to be added to the sampling strategy.