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MINUTES AND AGENDA FROM RESTORATION ADVISORY BOARD COMMUNITY
RELATIONS SUBCOMMITTEE MEETING DATED 8 APRIL 1997 CNC CHARLESTON SC
4/8/1997
CNC CHARLESTON

Agenda

Restoration Advisory Board Community Relations Subcommittee

04/08/97
APRIL SUBCOMMITTEE MEETING
3:30 PM TO 4:30 PM
Building NH-51 (CSO Office)
Confernece Room

Attendees: Louis Mintz, Arthur Pinckney, Wannetta Mallette Pratt, Fouche'na Sheppard, Daryle Fontenot

Agenda topics

- Meeting Overview
- Earth Day Tour
- Zones A, B, C, I Investigation Results Fact Sheet
- Web Page for RAB
- Property Transfer Fact Sheet
- New RAB and RAB Goals Fact Sheet
- Other Agenda Items

Resource persons: Diane Cutler

May 9, 1994

NAVAL BASE CHARLESTON
RESTORATION ADVISORY BOARD
QUESTIONS AND ANSWERS CONCERNING ENVIRONMENTAL CLEAN-UP
SUBMITTED BY ARTHUR PINCKNEY ON APRIL 19, 1994

⇒ 1. How clean is clean? Will the base be cleaned to residential standards, industrial standards or what?

• Every effort will be made to restore the Base to the same environmental quality originally present before the Base existed. The technical terminology for this is to attempt "to clean-up the Base to background conditions." Determining background environmental quality will be difficult because large areas of the Base are dredged material.

If, and only if, it becomes apparent that background environmental quality cannot be determined, then the Base will be cleaned up to a level that will pose no significant risk to humans or the environment. The amount and type of clean-up will not be determined by anticipated future land use.

⇒ 2. What opportunity will the public have to review the proposed cleanup plan?

• The BRAC cleanup plan (BCP) is a management tool for maintaining status, schedules, strategies and budget information pertaining to environmental restoration of the Naval Base. At present the BCP is at the Under Secretary of Defense (USD) for review and approval. After approval by USD, the BCP will be updated with the latest status, and information and copies will be placed in the public repositories for access and review by the general public. The BCP was distributed to each RAB member for review and comment, and to allow the RAB members to see first hand the strategy and processes necessary to make base property available for public use.

⇒ 3. How does the Navy's environmental impact statement being prepared relate to the BRAC cleanup plan?

• The Environmental Impact Statement (EIS) is a requirement of the National Environmental Policy Act (NEPA) which was signed into law in 1970. NEPA requires federal agencies to incorporate environmental consideration in their planning and decision making through a systematic approach. Specifically, all federal agencies are to prepare detailed statements assessing the environmental impact of and alternatives to major actions significantly affecting the environment such as the Naval Base closure and its property reuse. This assessment is called an Environmental Impact Statement (EIS) and is being prepared for the Naval Base by Southern Division Naval Facilities Engineering

Command. The EIS is required to be completed within twelve months after an approved community reuse plan is developed and will be submitted to the Chief of Naval Operations for evaluation for any significant impact. The BCP as stated above is a management tool used by the BRAC Cleanup Team (BCT) to coordinate all aspects of the environmental cleanup process. The EIS is one part of the BCP process.

⇒ 4. When in May will the Environmental Baseline Survey be completed? How will the public get to see it?

● The draft Environmental Baseline Survey (EBS) is being reviewed by the Navy. The (EBS) is a snapshot of the environmental condition of property developed during the base fence-to-fence survey conducted earlier this year. It is required to be submitted to the South Carolina Department of Health and Environmental Controls (SCDHEC) by December of this year to identify Clean Parcels which are available for deed transfer to the public. No decision has been made as of yet on how the EBS will be made available to the general public.

5. What is the previous experience of Ensafe/Allen & Hoshall (the firm hired to prepare the Cleanup Plan and the Environmental Impact Statement)?

● Environmental & Safety Designs, Inc. (Ensafe) is an environmental consulting firm founded in Memphis, Tennessee in 1980 with the goal of providing responsive consulting services in the areas of hazardous waste management, hazardous substance remediation, hazardous materials safety and transportation, and environmental management. Ensafe has one of the largest staffs of environmental specialist in the Mid-south, including more than 50 geologists, environmental engineers, chemists, safety specialists, risk assessors, community relations experts and environmental scientists. Ensafe's work includes environmental management services with emphasis on compliance issues at Department of Defense installations.

6. Is it possible or likely that any of the contaminated areas of the base will qualify as Superfund sites?

● The Environmental Protection Agency (EPA) reserves the right to add any area to the National Priorities List (NPL) as a Superfund site anytime new information becomes available which justifies such action. This is always a possibility at any hazardous waste site in the United States.

EPA has reviewed all currently available information and determined that there is currently no justification for adding a site at Naval Base Charleston to the NPL as a Superfund site. Based on currently available information, we do not expect that subsequent investigation will justify such action.

7. How will federal agencies use the base if it has not been cleaned up yet?

- There is no requirement for property to be uncontaminated or cleaned prior to transfer to or used by federal agencies. It is the policy of the Navy to provide the condition of the property to the receiving federal agency prior to the transfer in the form of a property specific EBS. All property will be investigated and cleaned up on the base whether it will be used by another federal agency or not.

⇒ 8. How many of the 153 underground storage tanks are leaking?

- The total number of underground storage tanks (UST) on the base has not been fully determined. During the base investigation a complete inventory of USTs is being developed. All leaking USTs will be removed and remedial action taken to respond to any releases to the environment.

9. The BRAC Cleanup Plan says that the Environmental Baseline Study was conducted "under extreme constraints of time and accessibility" (p. 3-15). What does this mean exactly and how accurate can we consider it to be given this fact?

- The Environmental Baseline Survey (EBS) is one part of the President's "Fast Track" turnover of base property for community economic redevelopment. To expedite this process the Secretary of Defense established a time table for development of plans for environmental cleanup of the base. Ensafe/Allen & Hoshall was given four months to perform the fence-to-fence survey including mobilization and research. The EBS was developed from the information obtained by the survey which included review of all available records and interviews with past and present employees. It is a compilation of the best available information and is being utilized only for making initial determination of clean property for immediate availability to transfer by deed to the local community.

10. Are there any citizens representing environmental groups or citizens with environmental experience on the Restoration Advisory Board? If not, why not?

- The Restoration Advisory Board (RAB) is intended to bring together members who reflect the diverse interests within the local community, enabling the early and continued two-way flow of information, concerns, values, and needs between the affected community, Navy and environmental regulating agencies. Being a member of an environmental group or having an environmental background was not a prerequisite for selection as a community representative to the RAB. Invitation to apply for membership was extended to all groups and community members. Selection was provided by a non-biased group with emphasis on the diverse

interest within the local community. Several community members did identify on their applications that they have some environmental experience which will be an asset to the RAB.

11. The BRAC Cleanup Plan says "minimal investigation and sampling has been done at the base" (p. 3-31), and so the majority of the base remains unevaluated for contamination. What is being done to evaluate these areas?

- SOUTHDIRV has a contract with Ensafe/Allen & Hoshall to prepare a RCRA Facility Investigation (RFI) workplan which will be submitted to EPA and SCDHEC for approval. The RFI provides all requirements for investigation, sampling and analysis of the Naval Base to determine the types and concentrations of contamination present in the environment, how widespread the contamination may be, how fast the contamination may be migrating through the environment, and what adverse impact or threat the contamination poses to human health and the environment. The base has been divided into zones to provide manageable areas for the investigation. These zones and the strategies to be used are detailed in Section 4 of the BCP. The RAB and BEST committee reuse plan will be used to determine the priorities in which the zones will be investigated.

12. Given the high water table, how is the possibility of groundwater contamination being addressed?

- The RFI will provide the detailed investigative requirements for identifying contamination. This will include soil samples as well as water samples. If groundwater is found to be contaminated, it will be addressed. Groundwater monitoring wells will be used for water sampling and long term monitoring to ensure implemented corrective measures are working satisfactorily.

13. From the BRAC Cleanup Plan, it looks like there is a lot of asbestos and PCB contamination. Does this represent a serious problem? How will it be cleaned up?

- Although asbestos does exist on the base and there is a likelihood that some PCB contamination will be found, neither are considered serious problems. Asbestos surveys have been previously performed on the Naval Base. Friable asbestos which poses health concerns is being abated as it is identified. Any other asbestos will be evaluated to determine if it is accessible/friable. If it is the Navy will take the appropriate action for abatement prior to transfer. The existence of asbestos that is not accessible/friable will be disclosed to the property receiver. PCB contamination will be investigated during the RFI for each zone and the appropriate remedial action taken if contamination is found.

14. Will "Zone E" as listed in the BRAC Clean Up Plan be cleaned

up first because it is the most contaminated and offers the greatest potential for job creation?

- The selection of priorities for zone investigation considered several factors including the concern for environmental contamination and the potential for reuse. Unless other reasons prevailed, priorities for zone investigation have been based on actual or potential reuse. The existing sequence does not preclude a change in priorities if a reason to do so is identified. However, once the investigation has been initiated in a zone it is planned to be completed prior to leaving the zone. The current strategy is to use two teams to conduct the investigation activities to allow at least two zones to be investigated in parallel. Identification of investigative priorities will be subject for review by the RAB.

15. Is there a way to produce documents for the public that are summaries of the most important information in language that lay people can understand?

- The BCT plans to issue "Fact Sheets" that can be readily understood by the general public. Unfortunately the environmental world is filled with legal and technical terminology, and acronyms. The "Fact Sheets" will be produced in lay language to the maximum extent possible while maintaining the needed meaning for correct interpretation. The BCT will request the RAB to assist in development and providing comments on the "Fact Sheets" prior to them being issued. The BCT is also preparing a briefing package concerning BRAC and the environmental cleanup process that will be suitable for presenting to local interest groups in the community. This briefing will be presented at the next RAB and members will be requested to provide comments on its content. The BCT is open to other suggestions on information distribution to the general public.

16. Will the Environmental Impact Public Meetings be held the week of April 25?

- The EIS public meetings were postponed to the week of May 9 to coincide with the BEST committee consultant briefings. The schedule for these meetings will be provided at the RAB meeting on May 10.

**UPDATED RESPONSES FOR
RESTORATION ADVISORY BOARD QUESTIONS
PRESENTED BY ARTHUR PINCKNEY
DATED 19 APRIL 1994**

Response to Question 1

Future land use will plan a part in the cleanup level at some sites on the base. SCDHEC requirements are that all site be cleaned to residential standards. If the Navy proposed sites to be cleanup to industrial standards, the Navy must justify to SCDHEC reasons why residential cleanup standards can not be met. The approval of industrial cleanup standards is the decision of SCDHEC. The Navy's policy is to cleanup to reuse.

Response to Question 2

The last two years the BRAC Cleanup Plan has been updated by the submission of a BRAC Business Plan. This Business Plan has been given to every RAB member and is also located in the Information Repository at the Dorchester Road Regional Branch of the Charleston County Library at 6325 Dorchester Road, North Charleston, SC.

Response to Question 3

The Environmental Impact Statement (EIS) has been finalized and the Record Of Decision (ROD) was signed on May 7, 1996.

Response to Question 4

The Environmental Baseline Survey (EBS) was completed and submitted to the regulators in January 1996. The EBS was approved by the regulators in October 1996.

Response to Question 8

To date over 90 underground storage tanks have been removed at the base. Further investigate and cleanup of tank sites where leaks have occurred is currently under way. The Detachment is performing the tank removals, tank investigations and tank cleanups.

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September 7, 1994
Rev. Sept. 30, 1994

Restoration Advisory Board Questions
Presented by Arthur Pinckney
Dated August 9, 1994

⇒ 1. When will the BRAC Cleanup Team produce and distribute fact sheets on the cleanup process?

• During the RAB meeting of July 12 it was agreed that a sub-group of RAB members would develop the process for dissemination of information and status of the cleanup process. A progress report will be provided at the September 13 RAB meeting. Also, the Naval Base Public Affairs Office in conjunction with the BCT is providing news releases for general information to the public.

2. How are the Corrective Action Management Plan (CAMP) and the Comprehensive RFI Work Plan different from the Project Management Plan that the RAB has (page 19)? Can the RAB community members get a copy of these?

• In accordance with the HWSA portion of the RCRA Part B Permit, a RFI Work Plan is required to be developed to provide the investigative strategy for identifying environmental contamination on the Naval Base. Because of the size of the Naval Base, it was decided that a new approach would be used by dividing the base into twelve investigative zones. A Comprehensive RFI Work Plan for the base was developed with individual detailed Work Plans for each zone. The Comprehensive Work Plan contains a Project Management Plan (PMP), Sampling and Analysis Plan, Data Management Plan, Baseline Risk Assessment Plan and a Health and Safety Plan which are generic to all zones. The PMP identifies the technical approach, project management team and the schedule, or CAMP, for accomplishment of the RFI and Corrective Measures Study (CMS).

A draft copy of the PMP and CAMP were provided to each RAB member. The Comprehensive RFI Work Plan has now been approved by EPA. Final copies of the CAMP will be provided. Access to the Comprehensive Work Plan as well as all Zone Specific Work Plans will be provided to all RAB members as well as being available at the Information Repositories.

3. When will the 30 day public comment periods begin? Can the RAB produce an explicit fact sheet with a timeline that highlights opportunities for public participation?

- The 30 day public comment period addressed in the PMP is in support of the CMS which will select the specific remedies to cleanup up the Naval Base after the RFI. The RAB will have an important role for providing community input to the remedy selections. The CAMP provides anticipated schedules for the CMS for each investigative zone. The RAB sub-group will discuss the need for a fact sheet.

⇒ 4. Where is the cleanup process according to the activities described in table 5-1 (page 20)?

- The cleanup process is now in the RFI Work Plan stage. The Comprehensive Work Plan has been approved by EPA and the Zone H Work Plan is awaiting EPA final approval. Work Plans for Zones C and I are being completed for submittal to EPA and DHEC. Based on verbal agreement sampling began in Zone H on August 9, 1994. The CAMP also provides the schedule for the phases shown in Table 5-1.

5. Page 8 says that the tables in Appendix A-1 and A-2 "include proposed recommended actions for each SWMU and AOC." Are "proposed recommended actions" considered the same as the column labeled "investigative approach" in the tables? In that column in Appendix A-1 and A-2, what do "NFI", "CSI", and "RU" stand for?

- The "proposed recommended actions" and "investigative approach" are the same and designate the type of investigation necessary to determine the extent of contamination at an identified site. The following designators are used:

NFI - No Further Investigation is required based on information provided by the RFA that no releases of contamination to the environment have occurred.

CSI - Confirmatory Sampling Investigation is required where not enough information is available to determine whether or not contamination has been released to the environment. Based on the CSI either a full RFI or NFI designation will be made.

RU - Regulated Units are sites specifically regulated by the RCRA Part B permit and will be closed using specific requirements of the SC Hazardous Waste Management Regulations.

This page is from the questions & answers of Mr. Pinckney. He wanted clarification of questions #6.

RFI - RCRA Facilities Investigation is a full site investigation to determine nature and extent, and the potential pathways of contaminant releases where contamination is known to have been released to the environment.

⇒ 6. Has the BRAC Cleanup Team made commitments to hire in-state contractors for preparing the EIS and for the cleanup?

• The BRAC Cleanup Team is not involved in the contracting process. Contracting for both the EIS and cleanup is accomplished by Southern Division Naval Facilities Engineering Command using standard Department of Defense contracting regulations. *These contracting regulations require competition for the projects. These contracts cover many states and any qualified firm can provide information to be selected. The EIS is being done by Ecology & Environment, Inc., Buffalo, NY. Some of the cleanup will be done by Bechtel, Oak Ridge, TN. Bechtel will have a Charleston office and plans to sub-contract the work to local firms. The contract for the Environmental Baseline Survey is being done by Ensafe, Allen & Hoshall, Memphis, TN. They have a Charleston office that they staffed mostly from the local area.*

7. If "risk assessment protocols will incorporate future land use exposure scenarios" (page 17), might this not lock the land into specific future uses and foreclosure on others? In other words, does this not amount to tailoring cleanup standards to anticipated future use?

• The goal is to cleanup the environment to background for unrestricted future use. If this is shown to not be achievable then a risk base cleanup will be used. The risk base cleanup is a two part process. The first step is to perform a risk assessment based on pure data to determine what effect the contaminants are having on human health and the environment with no specific reuse incorporated. Secondly risk management will be invoked to determine cleanup levels.

8. Who is actually doing the Environmental Baseline Study and when do we get to see it?

• Ensafe/Allen & Hoshall, an environmental engineering contractor, is preparing the Environmental Baseline Survey (EBS). The draft EBS is in Navy review, and when completed will be placed in the Information Repository.

9. What is a "presumptive remedy approach" (page 17)?

- The presumptive remedy approach takes into account all available information prior to beginning the investigative phase. Possible remedial actions are identified based on the anticipated contaminants to assist in determining the extent of sampling and identifying how the resulting data will be used. This does not prevent the use of other remedial actions or extension of sampling if determined necessary.

⇒ 10. How are "background concentrations" determined for the purpose of cleanup alternatives if the land has been used as a base and shipyard since 1901?

- This will be a difficult process since much of the base is fill material and all of the base has been developed. An undeveloped area similar to the base will be reviewed and background determined from this. If this is not achievable, the risk based assessment discussed above will be invoked.

11. What were the criteria for determining what would go on the "early actions" list? What about cancer-causing and radioactive agents?

- Early actions were selected based on the information that was known of an area and the contamination which is known to be present. The site must also have been definable enough that the source of the contamination could be removed. No cancer-causing contaminated areas have been identified. Radioactive materials are being removed and surveys to verify the absence of radioactive material are being accomplished by the shipyard under process closure.

⇒ 12. Do we have any data on the extent of ground water contamination?

- There is limited information that was obtained from existing ground water monitoring wells, but this is not adequate to make final determinations for cleanup. The RFI will provide the required data to characterize the groundwater contamination.

⇒ 13. What funding has been received and what is anticipated for cleanup?

⇒ See Updated Response

•As referenced in the BRAC Cleanup Plan, from October 1980 to September 1993, \$1.3 million was spent on the Installation Restoration of the Naval Base. Once the President's budget is approved, the funding cost tables can be made available. Due to contractual requirements, detailed budget information is not available for dissemination.

14. Will there be a memorandum of understanding signed between the Navy and the other federal agencies moving onto the base to clarify responsibility for cleaning up those areas transferred?

• The environmental cleanup of the property will remain the responsibility of the Navy. A MOU will be signed between the agencies which will provide for Navy access for continued investigation and cleanup. However, the new agencies will be responsible for the management of any hazardous waste which they generate.

15. When and how will the "public scoping " process be conducted?

• Formal public meetings are required for certain phases of the environmental process such as the EIS public scoping meetings, and the CMS and permit modification public meetings. These meetings will be announced in the newspaper and notifications will be sent to individuals who requested to be on the mailing lists. The RAB meetings, although not specific to any event, are also an important method for the public to become aware of the environmental cleanup process and have input into the process through their community members.

16. We would like the community to be able to review the risk assessment model, exposure standards, and data collection methods being used for the work plan - will the Sampling and Analysis Plan and Baseline Risk Assessment Plan describe these? Have they been prepared yet?

• The Comprehensive RFI Work Plan contains both the Sampling and Analysis Plan and the Baseline Risk Assessment Plan which have been approved by EPA. This document will be placed in the public repositories for review. A complete copy of the Comprehensive RFI Work Plan will be available at the next RAB meeting for review.

**UPDATED RESPONSES FOR
RESTORATION ADVISORY BOARD QUESTIONS
PRESENTED BY ARTHUR PINCKNEY
DATED 9 AUGUST 1994**

Response to Question 1

There are currently 8 Fact Sheets that have been distributed and a ninth fact sheet is being prepared.

Response to Question 4

The cleanup process has just started the Corrective Measures Study phase. The RCRA Facility Investigation phase is still underway. To date one zone (B) RFI report has been approved. There are also 5 zone (A, C, D, H, I) RFI reports in review by the regulators. Field work is under way in Zones F, J, & L. RFI reports are being prepared for zones E, G and K.

Response to Question 6

The SUPSHIP Portsmouth, VA Environmental Detachment Charleston (the Detachment is made up of former Shipyard workers) is being tasked with accomplishing the majority of the cleanup work currently underway on the base. Their environmental cleanup activities include underground storage tank removals, investigation and cleanups; interim removal actions under RCRA; asbestos abatement projects; lead based paint abatement projects; soil and groundwater sampling activities; bioremediation pilot project; and surveying. The Detachment has proved to be a viable source for accomplishing cleanup at the base.

Response to Question 10

The background concentrations determination explanation is as follows:

Inorganic chemicals such as metals and cyanide occur naturally in soil and groundwater, in amounts that vary from place to place. Soil that formed in a marshy environment, for example, might be expected to contain more arsenic than normal due to bioaccumulation by small organisms. When an inorganic chemical is detected in samples from an investigated site, there must be a way to determine whether it occurs naturally, or results from a release or spill. There are two separate issues: determining natural background concentrations, and comparing site concentrations to background concentrations.

Random samples from uncontaminated areas are needed to determine background. To obtain random samples, an arbitrary grid of lines is superimposed on a map of the naval base. Where the grid lines intersect, samples of surface soil, subsurface soil, shallow groundwater, and deep

groundwater are collected and sent to a laboratory for chemical analysis. The analytical results are then subjected to several types of statistical tests to estimate an expected range of naturally occurring concentrations. A value toward the top end of the range for each chemical in each category of environmental media (surface soil, etc.) is chosen as its *background reference value*.

For each type of environmental media at each investigatory site, the concentration of every inorganic chemical is compared to background levels in two ways:

- ☞ Each sample's concentration is compared to the corresponding *background reference value*. Those that exceed the reference value are considered potentially contaminated. This method identifies "hot spot" contamination in individual samples.
- ☞ Using a statistical test, concentrations of all samples at a given site are compared as a group to concentrations of all background samples as a group. This method identifies entire sites that are somewhat contaminated by a particular chemical, but have no "hot spots."

There are no background comparisons made for organic compounds because all organics are considered potentially anthropogenic (man-made) and, therefore, not of natural origin. If the concentration of a given inorganic chemical in soil or groundwater at a site is both greater than background and greater than a corresponding risk-based concentration established by EPA, a formal risk assessment is triggered for the site. The outcome of the risk assessment determines what further actions may be taken.

Response to Question 12

All information the Navy has available on groundwater contamination has been presented to the RAB when the environmental update is presented at every RAB meeting. Fact Sheets on the investigation results of Zones A, B, C, H, I also provide information on if groundwater is contaminated. If more details are desired on groundwater contamination, the RFI reports that have been approved by or submitted to the regulators are available for review at the Information Repository located in the Dorchester Road Regional Branch of the Charleston County Library at 6325 Dorchester Road, North Charleston, SC.

Response to Question 13

The funds required to complete the RCRA Facility Investigation and the Corrective Measures Study have been awarded to the contractor. The budget for the RFI/CMS is \$25.8 million. The estimate funds required for completion of the cleanup at the base starting from October 1996 to the end of the cleanup is approximately \$50 million. The timing of the completion of the cleanup at the base will be a function of how funds are appropriated to the Navy by Congress and how Southern Division receives the required funds from Navy Headquarters.