

N61165.AR.004871
CNC CHARLESTON
5090.3a

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
COMMENTS ON DRAFT RESOURCE CONSERVATION AND RECOVERY ACT FACILITY
INVESTIGATION REPORT ZONES D, F AND G CNC CHARLESTON SC
8/9/1996
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

CERTIFIED MAIL
Return Receipt Requested

August 9, 1996

LCDR Paul Rose
Officer in Charge, Caretaker Site Office
Naval Facilities Engineering Command, Southern Division
Building NH-45
Charleston Naval Base
Charleston, SC 29408-2020

Re: Draft Zones D, F and G RCRA Facility Investigation
(RFI) Work Plan, Dated June 13, 1996
Charleston Naval Shipyard
SC0 170 022 560

Dear LCDR Rose:

The South Carolina Department of Health and Environmental Control (Department) and the U.S. Environmental Protection Agency (EPA) have reviewed the above referenced Draft Zones D, F and G RFI Work Plan 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 Charleston Naval Base has not adequately fulfilled the requirements of Permit Condition IV.C.4.

The Department believes that the attached comments generated from this review, do not compromise in any way the technical aspect of the proposed Work Plan. Therefore, depending upon the submission of response to the attached comments and revised pages to this Department and EPA, within fifteen (15) days, the above mentioned report will be considered approved. The U.S. Environmental Protection Agency provided no comments.

Letter dated
August 9, 1996
Page Two

Should you have any questions regarding this issue, please contact Johnny Tapia at (803) 896-4179 or Paul Bergstrand at (803)896-4016.

Sincerely,



John Litton, P.E., Manager
Hazardous Waste Permitting Section
Bureau of Solid & Hazardous Waste Management

Attachments

cc: Paul Bergstrand, Hydrogeology
Rick Richter, Trident EQC
Brian Stockmaster, SOUTHNAVFACENGNCOM
Tony Hunt, SOUTHNAVFACENGNCOM
Doyle Brittain, EPA Region IV

**COMMENTS ON DRAFT ZONES D, F AND G
RCRA FACILITY INVESTIGATION (RFI) WORK PLAN
BY THE SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL (SCDHEC) DATED JUNE 13, 1996**

Comments by:
Johnny Tapia

1. Comment 4 from the previous set of comments sent by the Department was not properly addressed. Figure 2-25 still does not include AOC 641.

2. On table 2-45, soil and sediment were defined as potential contamination pathways for AOC 706. However, table 2-46, Sampling Plan, does not indicate that sediment samples will be collected at AOC 706.
The response to comments sent with this June 13, 1996 Work Plan states that the surface water runoff patterns will be addressed by collecting sediment samples that are associated with AOCs 633 and 634. There are six sediment samples to be collected for the two above mentioned AOCs and from Figure 2-24 can be seen that only one of proposed sediment samples, located at the NW corner of building 246, could be directly related with surface runoff drainage patterns from AOC 706.
Section 2.23.4 of the Work Plan describes drainage patterns and systems from AOC 706 (bldg. 246) directed towards the wetland (AEC IV-1) west of the building. However, these drainage patterns are not depicted on Figure 2-24 and makes it difficult to judge if an appropriate number of sediment samples, related with drainage patterns from the area of AOC 706, will be collected and safely determine if contamination from the site has reached the wetland area.
Figure 2-24 should be detailed to include all the described drainage patterns from the area of AOC 706.

3. The last sentence of the second paragraph of section 2.23.4 reads:
"Sampling will characterize the potential pathways highlighted in table 2-46." The highlighted potential pathways are actually in table 2-45.

4. Page 2-135 states that table 2-44 presents the sediment samples and analysis proposed. Table 2-44 is the Sampling Plan for AOC 646. The table that presents the sediment samples and the analysis proposed should be included and/or correctly identified.