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LETTER FROM SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL
CONTROL COMMENTS ON REVISIONS TO DRAFT FINAL RESOURCE CONSERVATION
AND RECOVERY ACT FACILITY INVESTIGATION WORK PLAN ZONE J CNC CHARLESTON
SC
11/18/1996
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

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

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

November 18, 1996

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

**Re: Revisions to Draft Final Zone J RCRA Facility Investigation
(RFI) Work Plan, Dated September 10, 1996
Charleston Naval Base
SC0 170 022 560**

Dear LCDR Rose:

The South Carolina Department of Health and Environmental Control (Department) and the Environmental Protection Agency (EPA) have reviewed the above referenced Revisions and Response to Comments to the Zone J 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 the Charleston Naval Shipyard has not adequately responded to previous comments submitted June 28, 1996.

Attached are comments provided by the U.S. Environmental Protection Agency and the Department. Within thirty (30) days of receipt of this letter, please make the specified changes and resubmit the Zone J RFI Work Plan in the Final form to the Department and U.S. EPA.

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

Sincerely,



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

Attachments

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

**SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL
CONTROL (SCDHEC) COMMENTS ON THE REVISIONS TO DRAFT ZONE J
RCRA FACILITY INVESTIGATION (RFI) WORK PLAN,
Dated September 10, 1996
CHARLESTON NAVAL BASE**

1. This is the only comment in reference to the revisions of the RCRA Facility Investigation (RFI) Work Plan for Zone J.

Comment # 4 made by the SCDNR has not been fully addressed. This comment asked NAVBASE to include a summary of the analytical data obtained from the 1991 dredging sediment samples, which were taken along the river waterfront. This data should be presented in a similar manner as that presented in table 4-3 for the USACOE sampling event of 1995. Detection limits also should be included and a figure that depicts the location of the sampling points will also be helpful.

Accordingly, the 1992 sampling event should be presented in the Work Plan. All this information will be helpful in determining the spatial distribution and a possible route and origin of contaminants present at the NAVBASE Cooper River waterfront.

ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE DRAFT
RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION
WORK PLAN FOR ZONE J

GENERAL

1. Response to USEPA Comments, Response 10. It says in part that:

The Navy reiterates that some RCRA Permit requirements are not readily applicable to Zone J.

EPA disagrees with this response and expects full compliance with the RCRA Permit.

2. Response to USEPA Comments, Comment 10. While portions of the Zone J RFI Work Plan have been revised to take into consideration this former EPA comment, some sections have not been revised thus continuing to allude to the Zone J RFI effort as being primarily an ecological risk assessment for the entire Naval Base. These sections require revision. Some examples are cited below.

SPECIFIC

1. Page 1-1, Section 1.0. The statement is made that:

The scope of this work plan also includes the complete assessment of ecological risk posed by terrestrial sites determined to be potentially hazardous through other zone-specific investigations.

See General Comment 2 above. This should be revised to state clearly that each zone-specific investigation will be complete within itself including all necessary ecological risk assessment.

2. Page 1-8, Section 1.2. The statements are made that:

The Zone J RFI will also ensure that each zone-specific AOC/SWMU investigation includes a complete and formal ecological risk assessment (ERA) following the strategies presented in Section 3, Volume III of the *Final Comprehensive RFI Work Plan*. Preliminary assessments of specific AECs may be conducted as part of a zone-specific investigation and, if necessary, completed during the Zone J RFI.

See General Comment 2 and Specific Comment 1 above.

3. Page 1-11, Section 1.2. The statement is made that:

Not meeting the RCRA definition of a "facility" and lacking the conditions typically found at terrestrial

sites, the water bodies will be assessed through the evaluation of the potential receptor(s) and/or transport pathways rather than the potential contaminant source(s).

- a. Conversely, EPA is interested in the potential contaminant source(s), the transport pathways, and the impact of that contamination on potential receptor(s), in that order.
- b. In the other zone-specific RFI Work Plans, a number of specific sites have been identified where wastes were discharged directly into Zone J. To a limited extent, these sites will be investigated in conjunction with those other Zone investigations. Further, a number of sites have been identified where surface water and/or groundwater might discharge wastes directly into the water bodies. If necessary, EPA is prepared to designate every one of these sites as a SWMU, to require the development of a RCRA Facility Assessment (RFA), and to require a RFI for each site. However, if we can accomplish the same result without this extra time and expense, EPA favors conducting these investigations in conjunction with the Zone J RFI. For each of these sites, EPA wants to know the same information as for a land-based site. Specifically:
 - 1) What is the horizontal and vertical extent of contamination?
 - 2) What is the nature and concentration of the contamination?
 - 3) What is the fate and transport of the contamination?
 - 4) What is the risk to human health as a result of the contamination?
 - 5) What is the risk to the environment as a result of the contamination?

As with the land-based sites, grid samples and background samples are required. EPA expects the same for the Zone J investigation.

- c. See General Comments 1 and 2, and Specific Comment 1 above.
4. Pages 1-11 - 12, Section 1.2. The statements are made that:
- To support the fast-track objectives, the submittal of each zone-specific RFI Report will not be suspended until the basewide risk assessment is completed.

Instead, each RFI report will present, at a minimum, a summary of preliminary risk assessment findings.

See General Comment 2 and Specific Comment 1 above.

5. Page 4-51, Section 4.2.5. The statements are made that:

The previous Zone H and Zone I samples were not specifically designed to assess ecological risk. They have, however, provided valuable information for the Zone J Phase II contaminant assessment of AEC V-1.

See General Comment 2 and Specific Comment 1 above.

6. Page 4-53, Section 4.2.5. The statements are made that:

The previous Zone H samples were not specifically designed to assess ecological risk to AEC V-2. They do, however, provide valuable information for the Zone J Phase II contaminant assessment.

See General Comment 2 and Specific Comment 1 above.

7. Page 4.84, Section 4.2.5. The statements are made that:

Furthermore, it has been reported that the USACOE is considering acquiring Clouter Island for continued use as a land-based dredge spoil area. Until this possible transfer is substantiated, no action by the Navy is anticipated.

Regardless of the future owner and future use of Clouter Island, EPA expects the Navy to complete the RFI at Clouter Island as planned.