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CNC CHARLESTON
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RESPONSE TO SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL COMMENTS ON UNIFORM FEDERAL POLICY - SAMPLING AND ANALYSIS PLAN AREA OF CONCERN 523 CNC CHARLESTON SC

09/03/2014

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UFP-SAP Review

Reviewer: Meredeth Amick, SCDHEC Project Manager
Document: AOC 523 Charleston Naval Complex, Charleston, SC
Date: 03-Sep-14

Comment Number	Worksheet and/or Section	Comment	Response
1	General	The CMS Work Plan for AOC 523 proposed a geophysical survey to identify any tanks remaining at the site. This work plan does not propose a geophysical survey. Please discuss the discrepancy.	The as-built drawings for Building 198 show that the tanks associated with AOC 523 were removed prior to building construction. Therefore, a geophysical survey is not necessary for AOC 523. A statement has been added to Worksheet 9 and Section 10.1.2 stating that a geohysical survey is not needed for the site.
2	General	Please ensure that the lab utilized for sample analysis is certified in the state of South Carolina.	A statement has been added to Section 14.3.3 including GCAL's SC Certification number: 73006001.
3	General	The Department feels that surface samples would not be representative of site conditions or the conceptual site model for AOC 523 due to site preparations for Building 198 disturbing the historical surface soil.	Agreed. Surface samples have been removed from the sampling requirements for AOC 523. Text has been added to Section 10.1.4.
4	Page 10-9	Based on the Conceptual Site Model and site use as a gas station, the Department typically requires investigation for BTEX, Napthalene, MTBE, Benzo(a)pyrene, benzo(b)fluoranthene, Benzo(k)fluoranthene, Chrysene, Dibenz(a,h)anthracene, and metals.	Agreed. The constituents of concern for AOC 523 have been reduced to BTEX, naphthalene, MTBE, select PAHs (Benzo(a)pyrene, benzo(b)fluoranthene, Benzo(k)fluoranthene, Chrysene, and Dibenz(a,h)anthracene), and metals. Text has been added to Section 10.1.4, 10.1.6 and the relevant worksheets which list the COCs for the investigation.
5	Worksheet 11	At this time the Department does not feel there is sufficient evidence to support using the TDS argument for groundwater screening. According to the South Carolina R.61-68 Water Classifications and Standards, "Underground source of drinking water (USDW) means an aquifer or its portion: ... Which contains a sufficient quantity of ground water to supply a public water system or individual residential well; and ... contains water with less than ten thousand milligrams per liter total dissolved solids." The Department does however support the use of the team developed groundwater background values for screening.	Agreed. Sufficient evidence is not available to support using the TDS argument for groundwater beneath AOC 523. Therefore, Resolution Consultants will collect the samples necessary to evaluate whether the aquifer contains an underground source of drinking water as defined in the South Carolina R.61-68 Water Classifications and Standards. Text has been added to Worksheet 11 and Section 14.6.1 to incorporate the South Carolina regulations.
6	Page WS 11-3	MCLs should be retained as relevant and appropriate screening criteria for groundwater analytical data generated as part of the data gap investigation, in addition to EPA Tapwater RSLs.	Agreed. The MCLs have been added to Step 5 and Worksheet 15 as relevant screening criteria for groundwater.
7	Page WS 11-3	The Department reviewed this document as a CMS Work Plan Addendum and believes that the Data Gap Investigation Report can be combined with the CMS Report in one document. If results indicate additional work is necessary, please submit a new CMS WP Addendum.	Agreed. The investigation results will be incorporated into the CMS Report. If the results indicate the need for additional investigation, then a CMS Workplan Addendum will be submitted in addition to the CMS Report. References to a Data Gap Investigation Report have been removed from this document.
8	Page WS 14-1	The well permit application should be submitted to the DOD Corrective Action Section.	A well permit application has been submitted to the DOD Corrective Action Section.
9	Page WS 15-1	The reference limits for groundwater should include CNC background values for inorganics written by CH2MHill in 2001, This data set supersedes the EnSafe 1997 background study.	The CNC background values for inorganics written by CH2MHill in 2001 have been incorporated into the screening criteria for groundwater found in Worksheet 15.
10	Page WS 15-1	The reference limits should include Railroad Track Background Values for PAHs, Arsenic, and Copper for Surface Soils written by CH2MHill in 2001.	In accordance with Comment #3, surface soils will no longer be collected for this investigation.
11	Appendix D	The arrow on the "Map of US Naval Base Charleston Naval Base, SC Showing Conditions on June 30, 1950" appears to point to the wrong area.	The referenced historical drawing has been corrected.
12	Appendix D	Please explain why the document discusses 2 tanks removed that were associated with AOC 523; however, this map labels "4 existing underground tanks to be removed" in the area of AOC 523.	The document references the two gasoline USTs were associated with the former gasoline station. There is no additional information available regarding the other two tanks depicted on the 1966 As-Built drawing. Please note that these two additional tanks were removed at the same time as the two gasoline USTs to accomodate the construction of Building 198. Also, the other two tanks were located in the same area as the two gasoline USTs. As such, the current sampling design is sufficient to evaluate the environmental impact associated with the other two tanks.