

N61165.AR.005421
CNC CHARLESTON
5090.3a

LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL REVIEW OF DRAFT ENVIRONMENTAL SURVEY FOR
TRANSFER AND DRAFT FINDING OF SUITABILITY TO TRANSFER FOR THE EDC PHASE I
PARCELS DATED 25 OCTOBER 1999 CNC CHARLESTON SC
02/08/2000
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2600 Bull Street
Columbia, SC 29201-1708

COMMISSIONER:
Douglas E. Bryant

February 8, 2000

BOARD:
John H. Burriss
Chairman

William M. Hull, Jr., MD
Vice Chairman

Roger Leaks, Jr.
Secretary

Mark B. Kent

Cyndi C. Mosteller

Brian K. Smith

Rodney L. Grandy

Henry Shepard II, P.E.
Caretaker Site Office
NAVFACENGCOM, Southern Division
P. O. Box 190010
North Charleston, SC 29419-9010

Re: Draft Environmental Survey for Transfer and Draft Finding of Suitability to Transfer for the EDC Phase I Parcels, Charleston Naval Complex, SCO 170 022 560, Revision 0, dated October 25, 1999.

Dear Mr. Shepard:

The South Carolina Department of Health and Environmental Control (Department) has reviewed the above referenced document (10/25/1999) according to applicable State and Federal Regulations, and the Charleston Naval Complex Hazardous Waste Permit, effective September 17, 1999. The attached comments were generated based on this review. These comments must be addressed prior to the approval/concurrence of the above referenced document. The Department would be amenable to facilitate the comment resolutions in order to expedite the review and approval process.

Should you have any questions regarding this comments, please contact Mihir Mehta (803) 896-4088 or Paul Bergstrand at (803) 896-4016.

Sincerely,

Ann R. Clark
Federal Facilities Liaison
Environmental Quality Control

1. Comments by Mihir Mehta
2. Memo from Paul Bergstrand to Mihir Mehta dated January 24, 2000
3. Memo from Paul Bristol to Mihir Mehta dated January 28, 2000

cc: Mihir Mehta, Corrective Action Section
Paul Bergstrand, Hydrogeology
Susan Byrd, Corrective Action Engineering
Rick Richter, Trident EQC
Paul Bristol, Underground Storage Tank
Tony Hunt, SOUTHDIV
Dann Spariosu, EPA Region IV
Jerry Johnson, RDA

South Carolina Department of Health and Environmental Control comments on: Draft Environmental Survey for Transfer and Draft Finding of Suitability to Transfer for the EDC Phase I Parcels, Charleston Naval Complex, SCO 170 022 560, Revision 0, dated October 25, 1999.

Comments By Mihir Mehta:

1. The individuals from SCDHEC, Navy, and EnSafe conducted the walk through on December 7 and 8, 1999 for some portions of the land parcel that is proposed for transfer herein. Based on the visual observation by SCDHEC individuals the following problems were noted that could pose minor to severe form of hazard/risk to human health and the environment. Based on these issues and the attached comments the Department does not concur with the referenced FOST at this time.

1a. Lead based paint was observed to be peeling off the walls and ceilings. Please see the attached photographs as evidence of the problem.

Also Section 5.12. Lead-Based Paint Survey and Table 5-12 should be revised in accordance with the observations and comments from the walk through.

1b. Asbestos tile falling, floor ripped, pipe insulations torn creating the friable asbestos. Some of the buildings are even posted no entry due to friable asbestos. Please see the attached photographs as evidence of the problem.

2. Draft FOST page 13 states "asbestos containing material is not a CERCLA regulated substance that would impede the transfer of the property." The Department believes that friable asbestos is a potentially harmful substance that would deem a facility not suitable for transfer. This is supported by conditions of the Navy policy stated in section 1-1, and evaluation criteria stated on Page 2-3. This also states that "prior to the transfer of these properties, however, an attempt will be made to remove friable asbestos to the extent possible." This statement does not support a Navy commitment to remove the Friable asbestos.

3. Draft FOST, page 13, states that "nonresidential structures are not subject to federal law governing lead based paint hazards." Does this mean that the Navy will place a lease restriction on all the properties in this EBS that they can not be used for residential use? This seems contradictory to the past use of some of the facilities, such as the barracks which are identified in Table 5-12 as having peeling lead based paint. Lead based paint must be addressed specifically for Building 807, College of Charleston Day care Center.

4. Draft FOST, page 12, The section on Environmental Compliance Agreements, Permits, and orders states that the only permits that the Navy holds for the shipyard are a RCRA permit. This does not address any other types of permits such as NPDES or Air permits. This information should be included.

5. Section 2.4. Property Classification.

Based on the Table 2-2 CNC BRAC Area Types, please provide a map that would indicate the EDC Phase I parcel with respect to the property classification. Also, provide the similar information for the adjacent property to EDC Phase I parcel.

6. Section 3.0. Past and Current Operations.

This section provides very general information regarding the past use/operation of the property to be transferred. (For example: 1. It states that the facility was previously used as a warehouse. What kind of warehouse and what was stored is not specified. 2. It states that the facility is not in use or is vacant or empty or remodeled. This does not provide any information regarding the past use.). One of the criteria for identifying the "uncontaminated parcel of land" per EPA guidance is to have a complete understanding of its past operation or use. Therefore, please provide a detail discussion for the operation of the buildings and spills or accidents that may have temporarily released contaminants into the surrounding media.)

Also, state the current condition of the buildings with respect to lead based paint, asbestos, solvents, etc. Provide photographs, that were taken during the site visit, of the buildings to illustrate their current conditions.

7. Section 3.0. Past and Current Operations.

Facility NS-69. Please provide adequate information regarding the current conditions and future disposition of the boilers, above ground storage tanks, and associated piping.

Building 135. Please state in detail the current condition and past releases with respect to its use to store paint, batteries, solvent, lubricants, and degreasers.

Building 220. Please state in detail the current condition and past releases with respect to fuel oil, hydraulic fluid, paint, fertilizer, lubricating oil, and commercial cleaning products.

Building 245. What are the miscellaneous chemicals being stored currently? Also, state the releases from the past activities.

Facility 401. Please explain how would the property be transferred and remediated with the 6000-gallon aboveground storage tank located onsite.

Facility 451-L. Address the status and ownership of the transformers and batteries.

Facility 1448. The facility has about six inches of water with chemicals present onsite and therefore, the disposition and clean up is required prior to transfer. If Navy believes otherwise please provide adequate explanation.

Facility 1601-B. This is the boiemediation facility. States that facility is clean. Please provide verification.

- Facility 1765. The paragraph states that the facility is functional and in use. Who is operating the facility and provide information that no release or spills have occurred. How are the liability issues related to operating property being transferred under the referenced authority (CERCLA 120 h).
- Facility 2501 Document states that the interior of 2501 was not observed due to the presence of asbestos dust. How will this be addressed?
- Facility 2553 The document states that 1999 site visit noted one drum of solid waste. What is the status of this drum?

8. Section 4.0; Environmental Setting; page 4-1.
Please provide a map or a figure that illustrates the environmental setting and features that are associated with this parcel of land to be leased.
9. Section 4.3; Hydrogeology; page 4-2.
The first line states that, "Most potable water on the Charleston peninsula is supplied by surface water sources (Edisto River)." Please delete this sentence as it has no relevance pertaining to the hydrogeologic setting for the Charleston Naval Complex.
10. Section 5.3. CERCLA-Related Contamination.
The referenced section should have adequate figure(s) to illustrate the location of this parcel with respect to other physical features, landmarks, and specifically its relationship/vicinity with other zones, SWMU, and AOC.
11. Section 5.0 Findings for Subject Property.
As written this section does not provide any information or details regarding the past history of use or operation (with respect to releases, spills, or accidental environmental impact) and no data has been collected (and if collected and analyzed not presented) to show that there is no threat to human health and the environment. Per EPA guidance and CERCLA 120 (h) (4) the above stated information is necessary for concurring with the proposal that the referenced parcel of land is uncontaminated. Please revise all pertinent subsections of the referenced document to address this comment.
12. Section 5.2, Table 5-1. The status of the following items need to be addressed:

- Facility 321- Two 55 gallons drums of solid waste
- Facility 451A- Possible PCB containing equipment
- Facility 451L- Batteries and possible PCB containing Equipment
- Facility 1400- 5 gallon paint containers
- Facility 1448- Chlorine Tanks
- Facility 1505- New and used oil in 55 gallon containers
- Facility 1509- Paint, used oil and Varsol cleaner
- Facility 1514- Disconnected batteries
- Facility 1656- Used oil, new oil, hydraulic fluid, acetylene canisters
- Facility 1765- Petroleum products

Facility 1776- Two 55 gallon drums of oil contaminated soil, a transformer and used oil

Facility 1881- 5-gallon containers of gasoline

Facility 1883- 5-gallon containers of gasoline

Facility 1884- gallon containers of ODOR solvent, floating degreaser. And transmission fluid

Facility 2501- Asbestos abatement

SCE&G Storage Yard- PCB transformers

13. Section 5.3. CERCLA-Related Contamination (Installation Restoration Program). Provide adequate maps to show the location of the parcel of land to be transferred. with respect to SWMUs and AOCs in the vicinity (as listed in Table 5-2) and their association as deemed appropriate.
14. Section 5.4. Storage Tanks and Oil/Water Separators. Please explain why the oil/water separators are a part of storage tank program when the oil/water separator could have contaminants other than virgin petroleum products. The Department expects that the oil/water separators be not a part of tank program. Please discuss and revise the document accordingly.
15. Section 5.5, Table 5-8 lists several boilers or generators. What is the status of air permits on these units?
16. Section 5.6. Asbestos. First paragraph last sentence states that, "No formal asbestos surveys were performed to specifically support preparation of this EBST, and no samples of suspected materials were obtained." This sentence does not provide any rationale whether there is a problem associated with asbestos or not and therefore, cannot concur with the conclusions presented in the document. Please provide definitive documentation and/or data to show the status of asbestos related health risk for the proposed land parcel to be transferred.
17. Table 5-10. PCB-Affected Areas.
 - 17a. The last column, "current status", has comments such as "not applicable" where the facility use was confirmed and historical information as shown release and interim clean up. The current status should state the current condition of the site with respect to risk/hazard and has the clean up action achieved the final clean up goals. Please revise.
 - 17b. The last column, "current status", has comments such as "A < 50 ppm pad-mounted transformer is associated with this building". Please explain the relevance of this information and relate it to the risk exposure pathways to show whether it is protective of human health and the environment. What impact would it have and was there any PCBs spills, release, or storage without controls. Please revise the text as deemed appropriate.

- 17c. The last column, "current status", has comments such as "No information was available concerning the status of this transformer". This is not acceptable as Navy being the owner of the property should have a good idea what the current status is. Please revise.
18. Section 5.12, Table 5-12 There is peeling potentially lead based paint for many buildings. Since it appears that the Navy does not plan to remediate the lead based paint, the Navy must impose a deed restriction on these buildings. Please explain how this will be done and specifically how it will effect future use in building designed for residential and recreational use (children present).
19. Section 5.17. Lead in Drinking Water.
The referenced section does not describe whether there is a problem or not nor proposes any conclusions. The information provided is not adequate enough to agree or disagree with the final decision of the document. Many of the referenced lead tests were performed in 1990/1991. The information may be too old to be valid. Please revise to address this concern.
20. Section 5.18. Wetlands.
Please provide a map or a figure that would show all wetlands in and around the EDC phase I land parcel and how are the associated.
- 21.. Section 6.0; Findings for Adjacent Property.
This section does not present any information that would help understand the risk associated with the adjacent property and how does it relate the subject property. Please revise the entire section to include adequate information regarding the risk, hazard, or other issues related to adjacent property as deemed appropriate. This being one of the important criteria to be evaluated for the approval of this document, the Department recommends that Navy provide detail information in order to conclude/approve the referenced FOST.
22. Section 7.2. Recommended Use Restrictions.
Provide details of how Navy is planning to implement the recommended restrictions. Also, detail how the lead-based paint problem be corrected.
23. Section 10.
This section details the comments/concerns that were generated based on the March 1999 walk through and the scoping meeting. It appears that Navy has no intentions to improve the condition of the property to be transferred not have addressed any of the Departments concerns. Based on this the Department does not concur with the recommendations and the approval of the referenced FOST.
Comments on EDC Phase I

MEMORANDUM

TO: Mihir Mehta, Environmental Engineer Associate
Corrective Action Engineering Section
Hazardous and Infectious Waste Management
Bureau of Land and Waste Management

FROM: Paul M. Bergstrand, P.G., Hydrogeologist
Hazardous Waste Section
Division of Hydrogeology
Bureau of Land and Waste Management

DATE: 24 January 2000

RE: Charleston Naval Base (CNAV)
Charleston County, South Carolina
SC0 170 022 560

Draft EBST Report
EDC I
Dated October 1999, Revision 0

The materials referenced above have been reviewed with respect to the requirements of R.61-79 of the South Carolina Hazardous Waste Management Regulations, The Environmental Protection Agency's (EPA) RCRA Facility Investigation Guidance Document dated May 1989, the EPA Region IV Environmental Compliance Branch Standard Operating Procedures and Quality Assurance Manual (SOP/QAM) dated May 1996, the CNAV Final Comprehensive Sampling and Analysis Plan dated 30 August 1994, CERFA 120(h) as amended, DoD FOST Guidance and EPA BRAC FOST Guidance.

The document submitted does not support the request for "Finding of Suitability to Transfer". Comments on the Draft EBST Report are provided.

Draft EBST Report Comments
Paul M. Bergstrand
24 January 2000

GENERAL COMMENTS

1. The Executive Summary Table and Chapter 3 discussions do not include the Facility/Building map coordinates and Zone. These sections should be revised.
2. The information presented in this document has been spread out piecemeal and was never brought into focus. In fact, the discussions provided in Chapter 3 are less than complete and at times contradictory with other sections of this and other documents. This information should be revised.
3. Chapter 3 and Appendix B do not adequately identify the adjoining SWMUs and AOCs and fails to identify those sites which may pose a risk to the facilities being transferred. This information should be revised.
4. Tables 1-1, 5-2 and 7-1 describe the Last Use of the facility but not the actual former use of the buildings or the property during Navy control of the property. This information should be revised.
5. Numerous facilities in this document have undergone remedial actions for SWMUS, AOCs, USTs, etc. and have received a "No Further Action" as a result. This document, however, does not clearly provide the program area reference to confirm NFA status. This information should be provided.
6. The maps provided in this document primarily indicate buildings or facilities intended for transfer. The land as well as rail lines to be included with the building/facility transfer were not represented. This information should be provided.
7. Several facilities in this document such as signs, antenna, a cooling tower, and guard shacks have been demolished and it is not clear how or what will be transferred. This information should

be provided.

8. Numerous facilities in this document are associated with RFI investigations which have not been completed. Facilities such as warehouses, storage yards and piers are surrounded by railines and all facilities are associated with sewer lines. How this data was considered and evaluated should be included.

9. Zone J data relating to exceedences in Noisette Creek and the surrounding facilities has not been accounted for. How this data was considered and evaluated should be included.

SPECIFIC COMMENTS.

10. Executive Summary, Page 9 of 13

The paragraph for part A. (Hazardous Substance Contamination) should state "No VISUAL evidence of hazardous substance contamination was observed....." because the site visits were visual only and no sampling was conducted. Please modify.

11. Executive Summary, Page 11 of 13

The correct CERCLA reference is 120(h)(B)(ii). Please correct.

12. Building NSC-45, Page 3-4

The most recent site visit noted an extensive fume hood in the building. This document states "The warehouse is equipped with a battery charging station." It is not clear that the fume hood is associated with the battery charging station. Even if the fume hood was part of the battery charging station, it should be considered as a SWMU, as was SWMUs 49 and 63, and investigated as such. This building should be removed from the EDC I until the use of the fume hood is documented and properly investigated.

13. Building NS-46, Page 3-4

This building has an armory in the northeast corner. An armory would have potentially utilized solvents and petroleum products. The armory has not been identified as a SWMU or an AOC. Also, this armory has a sink and toilet which waste solvents and petroleum products may have been disposed. This issue was identified in the March 1999 site visit. The action "No evidence of release." in response to the comment is found in chapter 10 of this document. The action appears to be a visual observation only and does not provide any proof or evidence the armory has not been the source of a spill or release to the environment. This building should be considered as a SWMU or AOC and investigated as such. This building should be removed from the EDC I until the armaory is documented and properly investigated.

It should also be noted that the Navy Base did not develop a sanitary sewer system until the 1970's. All waste prior to this time was discharged into the nearby waterways. A storm sewer line runs along Hobson, next to the armory, and discharges into the Cooper River between Piers T and U. Analytical samples collected at this discharge point samples indicated VOC and SVOC constituents which could be related to the armory.

14. Facility NS-69, Page 3-6

The 12,000 gallon AST across the street should be identified and the extent of the release in relation to the Facility NS-69 should be addressed by the SC UST Program.

During the site inspection of March 1999, it was noted that leaks and spills from a caustic pump had left residue on and had damaged the walls of the facility. The "Action" or response to the comment found in Chapter 10 of this document is that "the leaks and spills have been contained." This would be correct only if the porous concrete block walls of the building were considered to be containment. It is doubtful the caustic leaks and spills have been cleaned up. Please confirm the condition and status of this release before inclusion in the EDC I.

15. Building 135, Page 3-8

Other tables and Appendicies indicate two USTs were previously located at this building. There is no identifiable Completion Reports documenting the UST removal. There are no RCRA or UST program data documenting the environmental status of this building. This building should be

removed from the EDC I until this information is provided.

16. Building 191, Page 3-9

Other tables and Appendices in this document indicate the former presence of a UST and an AST that have recently been removed. There are no information regarding an AST Removal Completion Report. This information should be provided.

17. Building 220, Page 3-10

The description of this building states there are three buildings at this site but only one building was addressed. Facility 220-A is a pump house and Facility 220-A was a garage for golf cart maintenance. Appendix B describes an AST which feed a boiler, staining associated with the AST and that the AST removal resulted in a NFA. All three buildings should be described and identified on a map or figure. The AST removal report with the NFA letter should be cited. The description of the building should identify how the golf carts were powered. If the golf carts were powered by gasoline, the location and status of the fuel supply must be defined. This information should be provided.

18. Facility 334, Page 3-12

The description states the Navy built a seaplane ramp in 1972. This use is not clear since the Navy transitioned from seaplanes to helicopters before 1972. Furthermore a seaplane would require some additional facilities such as tiedown, fueling, etc. which do not appear to be present. Please clarify.

19. Facility 513, Page 3-13

This section describes a catch basin as part of the railroad track scales. Other sections of the report indicate an oil water separator is also part of this facility. There has not been any indication

this OWS was identified or investigated as a SWMU or AOC. This facility should be removed from the EDC I until this information is provided.

20. Building 1079, Page 3-17

This facility is reported to have 5 AST "Holding Tanks" that have stains under the tanks. Other sections of this report fail to mention the tanks. It also appears the tanks have not been identified or investigated as a SWMU or AOC. This facility should be removed from the EDC I until this information is provided.

21. Building 1501, Page 3-20

This building is reportedly a scrap warehouse. Table 5-6, however, indicated a waste oil AST was also a part of this facility. There has not been any indication this AST was identified or investigated as a SWMU or AOC. This facility should be removed from the EDC I until this information is provided.

22. Building 1622, Page 3-23

This building is reported in Appendix B to have had analytical data documenting a mercury spill. The report, however, was not referenced. This building was not identified or investigated as a SWMU or AOC. This facility should be removed from the EDC I until this information is provided.

23. Building 1899, Page 3-32

The 1994 EBS identifies this building as a Hazardous Materials Storage building. A site visit confirms the identification. This building was not identified or investigated as a SWMU or AOC. This building should be removed from the EDC I until this information is provided.

24. Building 2501, Page 3-33

675

1721

2501

28. Tables 5-5 and 5-6

These tables report the USTs and ASTs at the buildings and facilities in the EDC I. It is not apparent that statements of no further action correspond with Department issued "NFAs". This information should be provided.

29. Table 5-10

The following buildings or facilities reported transformers that were not labeled as being < 50 ppm PCB or PCB Free. These buildings or facilities should be removed from the EDC I until this information is provided.

| Building or Facility | |
|----------------------|--------------------|
| 7 | NS-31 |
| NS-32 | 33 |
| 34 | 35 |
| 36 | 37 |
| 141 | 451-A |
| 451-L | 715 |
| 716 | 1079 |
| 1401 | 1514 |
| 1601B | 1623 |
| 1635 | 1776 (Locker) |
| 2501 | 2507 |
| 2552 | SCE&G Storage Yard |

30. 5.13 Wastewater Treatment and Disposal

The second paragraph states "It is possible that other wastewater generated in the past may have discharged into the Cooper River." The November 1996 Zone L RFI Workplan states "Prior to 1970's the Navy Base wastewater was discharged into the receiving water course without treatment." The workplan also indicated that numerous cross connects were present and potentially

remain. This section of the EDC should be corrected.

31. Table 6-1

The following SWMUs and AOCs state "RFI Complete, Transferred to UST (or PST) Program." The issue of mixing RFI and UST Program authority has been previously discussed with the Navy. This section of the EDC should be corrected.

| | |
|-----|-----|
| 508 | 511 |
| 523 | 656 |
| 659 | 662 |
| 675 | 676 |
| 677 | 13 |
| 178 | |

32. Appendix B

The following buildings or facilities should be changed from Light Green or Blue to Red. This change is because of information provided indicating that there have been releases reported, there have been no samples collected or the determination of no clean up necessary is not conclusive.

- 664. Mercury in a liquid
- 675. Mercury and solvents
- 1899. Hazardous Materials Storage
- 2501. No sheet for this building
SCE&G Storage Yard



Memorandum

Date: 28 January 2000

To: Mihir Meheta
Bureau of Land and Waste Management

From: Paul L. Bristol
Bureau of Water

Re: Finding of Suitability to Transfer and Environmental Baseline Survey to Transfer
EDC Phase 1
Charleston Naval Complex
Charleston, SC
Charleston County

The author has completed technical review of the referenced document and comments submitted by Mr. Dann J. Spariosu, EPA Remedial Project Manager (Spariosu to Hunt, 7 January 2000). With consideration to the above, the author concurs with comments provided by Mr. Spariosu concerning underground storage tank systems (UST) and aboveground storage tanks (AST). It is further requested that the facility provided an annotated history of all assessment and remedial activities for each UST/AST vessel noted in the document. This information will assist the Department in verifying environmental conditions for sites intended for transfer.

Should you have any questions I may be reached at 898-3559 or e-mail @bristopl.