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TRANSMITTAL LETTER AND SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON THE DRAFT BASE REALIGNMENT AND
CLOSURE CLEANUP PLAN CNC CHARLESTON SC

3/15/1994

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

South Carolina
DHEC
Department of Health and Environmental Control
2600 Bull Street, Columbia, SC 29201

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Board: Richard E. Jabbour, DDS, Chairman
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Promoting Health, Protecting the Environment

March 15, 1994

Mr. Bobby Dearhart
BRAC Environmental Coordinator
Building NH-50
Commander, Naval Base
Charleston, SC 29408-5100

Ms. Patricia Franklin
BRAC Environmental Coordinator
Building NH-50
Commander, Naval Base
Charleston, SC 29408-5100

Dear Mr. Dearhart and Ms. Franklin:

Attached are the South Carolina Department of Environmental Control comments on the Naval Base Charleston Draft BRAC Cleanup Plan, March 1994.

Should you have any question concerning these comments, please contact me at 803-734-4721. I look forward to working with you and EPA to resolve our concerns.

Sincerely,

F. Ann Ragan

F. Ann Ragan
Federal Facilities Liaison

cc: Mr. Doyle Brittan, EPA

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Groundwater Protection
Division

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March 15, 1994

**SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
COMMENTS ON: NAVAL BASE CHARLESTON DRAFT BRAC CLEANUP PLAN,
MARCH 1994.**

1. Deed restrictions are mentioned in Table ES-1 (under CERCLA Considerations - Suitability for Property Transfer) as possible mechanisms to control the manner in which property may be used by a future owner. However, restrictions placed on deeds may not adequately control future property use. The BRAC Cleanup Plan should be revised accordingly.
2. Page 1-1, paragraph 2 states that "the BCP presents a comprehensive strategy for implementing response action..." This should state response and remedial actions.
3. Page 1-3, Section 1-3 states that the BCP Schedule is contingent upon availability of funding. The Department does not concur with this statement. Lack of funding does not waive schedule requirements that are regulatory commitments.
4. On page 1-13, the third paragraph notes that "It is known that background contamination levels fluctuate widely across the base due to lack of homogeneity in soil conditions." Currently there are no data to support such a claim. Until base-wide soil background

data are obtained, it is more accurate to state that background levels are suspected to vary across the base. The BRAC Cleanup Plan should be revised accordingly.

5. The legend on Figure 1-9 indicates commercial and industrial uses. What is the difference between these designations?
6. On page 2-1, Section 2.2, the second bullet notes that "Residual contamination may remain on certain properties after remedial actions have been completed or put into place, thereby restricting the future use of those properties." It should be noted that after remedial actions are complete that any contamination must be within regulatory limits.
7. On page 2-3, the Naval Base should address compliance with the McKinney Act under the section which addresses donated property.
8. Table 3-2 - Potential Areas of Concern lists areas of potential contamination on the Shipyard. The sites listed in this table are referred to as "Potential Areas of Concern". This plan also uses the acronym PSWMU. Both of these terms are not defined in the BRAC Cleanup Plan. However, from the description of these sites, the vast majority appear to meet the definition of RCRA SWMU (see permit condition I.D.3 of the State's portion of the RCRA permit). These sites therefore fall under the regulatory authority of the RCRA permit (see RCRA permit conditions II.B.1 and II.B.2 of the EPA portion and IV.A.2, IV.B.1, and IV.B.2 of the State portion of the RCRA permit).

9. The sites listed in Table 3-2 that are numbered greater than 119 are apparently newly-discovered SWMUs. Neither the Department nor the EPA has been formerly notified of these new SWMUs. In accordance with the RCRA permit conditions cited above, the Shipyard is required to submit formal notification of any newly-discovered SWMUs within 15 days of such discovery. Within 90 days of such notification, the facility is required to submit a RCRA Facility Assessment for each newly-discovered SWMU. Since it is apparent that the Shipyard has known about them longer than 15 days, the Shipyard is in violation of the RCRA permit.

10. Virgin petroleum spills, leaks, etc. from nonregulated underground storage tanks (UST), pipelines, and aboveground tanks (AST) are regulated under the South Carolina Pollution Control Act (PCA) which prohibits unpermitted releases of organic or inorganic substances into the environment. The Ground Water Protection Division (GWPD) of SCDHEC provides regulatory oversight on PCA violations pertaining to petroleum hydrocarbon and other unpermitted discharges.

11. On all petroleum contamination sites including waste oil USTs, the State has lead and regulatory authority as outlined in comment 10. Therefore, references to existing projects should include the GWPD tracking number (i.e. A-10-AA-00000). As future tank projects are identified, these will be issued tracking numbers as well. In addition, the GWPD highly recommends that at this early stage in Naval Base clean-up that the projects pertaining to virgin petroleum hydrocarbons be separated from the RCRA process and that separate documents be compiled and submitted. This may allow for a

more timely review outside of the RCRA process.

12. Table 3-5, Underground Storage Tank Inventory, notes that some of the tanks contain waste oil, then under their status says "in use, non-regulated". Please note, as per the South Carolina Underground Storage Tank Regulation (R.61-92, Part 280), waste oil USTs are regulated. Therefore, waste oil USTs will be included with virgin petroleum contamination sites and be regulated through the GWPD.
13. Page 3-30, second paragraph states that RCRA closure of SWMU 25 has been completed. DHEC has not approved the closure certification of this unit. An RFI is still required at this site.
14. Page 3-66, Section 3.2.5 addresses Asbestos concerns. This section should cite the South Carolina Department of Health and Environmental Control Standards of Performance for Asbestos Abatement Operations, R-61.1.
15. Page 3-92, 3rd paragraph states that "CNSY has unpermitted stormwater discharge points associated with industrial activity." Please explain why these discharges are unpermitted.
16. Table 3-16 gives classifications for facilities. Please be advised that concurrence with the BCP does not constitute departmental concurrence with the classification I designation, and in no way should be considered as a clean parcel determination.

17. Page 3-152, Section 3.4.3 - Areas Where Storage, Release, Disposal, and/or Migration Has Occurred, but Require No Remedial Action states, in part, that "*Below action levels* means, in the absence of installation-specific risk-based or standards-based criteria, that the concentration of any hazardous substance or petroleum constituent in any medium *does not exceed* chemical-specific ARARs." However, since the Shipyard is a RCRA site and is conducting assessment and remediation under the authority of its RCRA permit, reference to ARARs is inappropriate. Therefore, all references to ARARs should be deleted from the plan.
18. On page 4-5, the CP indicates that investigations and subsequent remedial activities are being conducted under the RCRA process. Please note, UST, AST and other virgin petroleum hydrocarbon projects are and will be regulated by the GWPD.
19. Page 4-8, Section 4.1.5 - Remedy Section Approach notes in the first bullet that "Land use/risk assessment. Risk Assessment protocols will incorporate future land use in its exposure scenarios." It is the Department's position that all risk assessment calculations must be completed assuming a residential scenario. The BRAC Cleanup Plan should be revised accordingly.
20. Page 4-9 states that "clean up goals will be factored into the land use or deed restrictions." As stated in many meetings with the base, cleanups must be performed in accordance with RCRA requirements. Land use will not drive cleanup goals.

21. Page 4-11, Section 4.2.7 references four SWMUs (1,6,21,44). SWMU 44 does not exist. Should this be SWMU 25? Please refer to comment number 13.

22. Page 6.7 states "SCDHEC has stated that sub Chapter S be used as a clean up standard." Please be advised that subpart S under RCRA is proposed and has not been promulgated. The standards in Subpart S are action levels and not cleanup standards.

23. The Short Stay Recreational Facility located on Lake Moultrie is identified as a Naval property, but no indication is provided on the on-going site assessment. Potentially two environmental impacts (line leak and USTs) have occurred at this facility. Due to the proximity of the contamination to Lake Moultrie, the potential for surficial water impact is of concern.