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NSB KINGS BAY
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LETTER REGARDING GEORGIA DEPARTMENT OF NATURAL RESOURCES NOTICE OF
DEFICIENCY FOR INTERIM CORRECTIVE MEASURE SCREENING INVESTIGATION SITE
11 NSB KINGS BAY GA
6/7/1993
GEORGIA DEPARTMENT OF NATURAL RESOURCES

09.01.0005

Georgia Department of Natural Resources

205 Butler Street, S.E., Suite 1252, Atlanta, Georgia 30334

Joe D. Tanner, Commissioner
Harold F. Reheis, Director
Environmental Protection Division

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09.01.00.0025

June 7, 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

M.W. O'Neal
Captain, U.S. Navy
Commanding Officer
Naval Submarine Base
Kings Bay, Georgia 31547-5000

RE: Notice of Deficiency
Interim Corrective Measure Screening
Investigation Progress Report Site 11

Dear Sir:

This correspondence will confirm receipt of the Interim Corrective Measure Screening Investigation Progress Report received by the Georgia Environmental Protection Division (EPD) on April 22, 1993. The report has been reviewed. Several deficiencies were noted during the review; they are listed below.

SIGNATORY REQUIREMENTS

1. The report was not properly submitted. As required under the terms of Hazardous Waste Facility Permit HW-014(S)(2), Section I. C. 8., "all reports or other information requested by the Director shall be signed and certified according to the requirements in 270.11" of 40 CFR, which requires that the following certification, made by a responsible party, accompany the report:

I certify under penalty of law that this document and all attachments were prepared under my direct supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information

submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

This certification must be submitted for inclusion in the report.

2. This report was not signed and sealed by a Georgia registered Professional Geologist. Under Georgia Law, the Registration of Geologists Act of 1975, all geologic work performed in the public practice of geology must be prepared and approved by a Georgia registered Professional Geologist or a subordinate working under his direction, and must be signed and sealed by said geologist. Failure to comply may result in the rejection of the geologic work by EPD. This certification must be submitted for inclusion in the report.

SECTION 1.1

3. A topographic map of an appropriate scale, showing the site location, should be included in this section.

SECTION 2.5

4. The materials used in the Grab Sampler III, manufactured by Wheaton Instruments, should be specified. (This instrument was not listed in the RFI workplan.)

SECTION 2.7

5. Investigation-derived waste (IDW) collected from the decontamination area is not being handled in accordance with the procedure described in the RFI workplan submitted in October, 1991. Also, the disposal of this waste does not conform to the USEPA Guide to Management of Investigation-Derived Wastes (USEPA 1992). The decontamination water is considered non-indigenous IDW and may contain contamination that was not present when activities began on the site (e.g. solvents used for decontamination). In the future, IDW must be appropriately handled.

SECTION 4.2

6. This section should be revised to include a description of the method used to calculate hydraulic conductivity values from the piezocone data.

SECTION 4.3.1

7. This section should state whether or not the fountain in Porcupine Lake is in operation.

SECTION 5.2

8. The Georgia Rules for Hazardous Waste Management should be included in the ARAR's for NSB King's Bay. Paragraph 2 on page 5-5 should read "Georgia Hazardous Waste Management Rules are applicable when developing appropriate cleanup standards."

9. Table 5-1 contains a reference to "RCRA Subpart F-Groundwater Protection Standards (40 CFR 254.94)". This should be revised to read "40 CFR 264.94".

10. Table 5-1 should be revised to include the Georgia Rules for Hazardous Waste Management.

SECTION 6

The Screening Risk Evaluation was reviewed by EPD Toxicologist Randall Manning; his comments are provided below.

11. The term "unreasonable worst possible case scenario" should not be used. Terminology should reflect that one set of estimates is a result of assumptions of maximum possible exposure and one the result of a more central estimate of exposure.

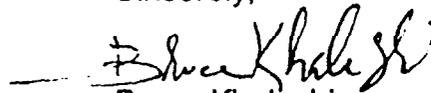
12. Table 6.5 should also be revised to clarify whether different inputs were used for the daily intake via inhalation of vapors from spray water for the "reasonable" versus "unreasonable" case. The exposure factors for the "unreasonable" case were not included in the table.

N.O.D. NSB Kings Bay
June 7, 1993
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Please revise the Interim Corrective Measure Screening Investigation Progress Report and resubmit it to this office within fifteen (15) days. If you have any questions regarding this notice, or need further assistance, please contact Ms. Madeleine Kellam or Mr. Reginald Young at (404) 656-2833.

FAX
404 651 9425

Sincerely,



Bruce Khaleghi
Unit Coordinator
Hazardous Waste Management Branch

File: NSB - Kings Bay