

N42237.AR.000353  
NSB KINGS BAY  
5090.3a

LETTER REGARDING GEORGIA DEPARTMENT OF NATURAL RESOURCES COMMENTS  
ON SCREENING INVESTIGATION WORK PLAN FOR SITE 2 NSB KINGS BAY GA  
12/22/1994  
GEORGIA DEPARTMENT OF NATURAL RESOURCES

# Georgia Department of

205 Butler Street, S.E., Suit

31547.000  
09.01.00.0095

0126

404/656-2833

December 22, 1994

G.E. Williams  
Captain, U.S. Navy  
Commanding Officer  
Naval Submarine Base  
1063 USS Tennessee Avenue  
Kings Bay, Georgia 31547-2606

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

RE: Notice of Deficiency  
Screening Investigation Workplan  
for Site 2

Dear Captain Williams:

The Georgia Environmental Protection Division (EPD) has reviewed the document entitled Screening Investigation Workplan for Site 2. This letter transmits EPD's comments on the document. Comment numbers are provided.

#### Section 4.1.4

1. The Georgia Hazardous Waste Management Act prohibits disposal of hazardous waste or hazardous constituents above site specific background levels. The presence of hazardous constituents such as volatile organics at any concentration is sufficient to prohibit land disposal of the liquid IDW as the plan proposes. Groundwater IDW must be containerized and tested prior to disposal. The Plan must be revised to include a proper treatment or disposal method for the liquid IDW.

2. This section states that "composite samples...from no more than six drums will be collected and submitted for TCLP analyses." The sampling for waste characterization must be representative. The text gives no indication of how this number of drums was selected for sampling, and therefore the representativeness of the sampling could not be evaluated. More information must be provided.

#### Section 4.2

3. The recommended target compounds slated for analysis are not sufficient. The goal of the screening investigation is to arrive at a conclusion regarding further action at the site. This cannot be accomplished using the selected target analytes presented in Table 4-1. Even if the target compounds were all found to be below site background, further investigation for metals and other organic compounds would be necessary.

NSB-Site 2

12/22/94

Page 2

The sample analyses should be expanded to include the full range of contaminants, in order to arrive at a conclusion (either no further action or a full-scale investigation and cleanup) without the need to re-mobilize for additional field work. Further, the use of TPH and BTEX analyses is of dubious usefulness for hazardous waste investigations (these methods are also being phased out under Georgia's Underground Storage Tank Program).

4. Historical information on Site 2 indicates that Hydrazine was poured onto the ground at the fire training pit. Hydrazine is both toxic and carcinogenic, and it is soluble in water. Leaching to groundwater is a possibility in sandy soils such as those at NSB. The workplan, however, makes no mention of the possible fate of the Hydrazine, and it does not propose any sampling for Hydrazine. Further consideration of the environmental fate of Hydrazine is warranted. While SW-846 does not list an EPA-approved test method for Hydrazine, such a method may exist. NSB is referred to Air Force Report No. ESL-TR-82-45, Environmental Fate of Hydrazine Fuels in Aqueous and Soil Environments, available through the National Technical Information Center (Publication number NTIS AD-A125813 (1983). An NTIS order form is enclosed for your convenience.

Please address the above comments and resubmit the revised report within thirty (30) days. If you have any questions regarding this letter, or need further assistance, please contact Ms. Madeleine Kellam at (404) 656-2833.

Sincerely,



Bruce Khaleghi  
Unit Coordinator  
Hazardous Waste Management Branch

Enclosure (1)

File: NSB - Kings Bay (R)

cc: Jeff Pallas



**(703) 487-4650**

8:30 a.m. to 5:30 p.m., Eastern

Subscriptions (703) 487-4630

FAX this form (703) 321-8547

TELEX 89-9405

U.S. shipping: Printed reports and microfiche copies are shipped First Class Mail or equivalent.  
 International shipping: Regular service: Printed reports and microfiche copies are shipped surface mail.  
 Air Mail service to Canada and Mexico: add \$4 per printed report; \$1 per microfiche copy.  
 Air Mail service to all other addresses: add \$8 per printed report; \$1.25 per microfiche copy.

## 1 Address

Date: \_\_\_\_\_

Last Name \_\_\_\_\_ First Initial \_\_\_\_\_

Title \_\_\_\_\_

Company/Organization \_\_\_\_\_

Address \_\_\_\_\_

City/State/ZIP \_\_\_\_\_

Attention \_\_\_\_\_

**Required to validate order** ➔

## 2 Payment

Charge my NTIS Deposit Account \_\_\_\_\_

Check/Money order enclosed for \$ \_\_\_\_\_  
(Payable in U.S. dollars)

Purchase order enclosed, add \$7.50 (U.S., Canada & Mexico only)

Purchase Order No. \_\_\_\_\_

Charge my  Amer. Express  VISA  MasterCard

Account No. \_\_\_\_\_ Exp. \_\_\_\_\_

Signature: \_\_\_\_\_

Telephone number \_\_\_\_\_

FAX number \_\_\_\_\_

## 3 Order Selection

Enter order numbers or FREE brochure number (Ordering by title alone will delay your order)	Customer Routing (up to 8 digits)	QUANTITY		UNIT PRICE	Intern'l Shipping (see above)	TOTAL PRICE
		Printed Copy	Micro-fiche			
1. _____ /CAU						
2. _____ /CAU						
3. _____ /CAU						
4. _____ /CAU						
5. _____ /CAU						
6. _____ /CAU						
7. _____ /CAU						

†NTIS will label each item with up to 8 characters of your organization's routing code.

NTIS does not permit return of items for credit or refund. NTIS will replace items if an error was made in filling your order or if the item is defective.

After the original stock of a technical report is exhausted, NTIS reprints directly from the master archival copy. These printed-to-order copies are the best possible reproductions.

Prices are subject to change.

Handling Fee U.S., Canada & Mexico—\$3  
 Other countries—\$4

Purchase order fee, if required—\$7.50

**GRAND TOTAL**



**RUSH SERVICE**—Call 1-800-553-NTIS or (703) 487-4650 outside the U.S.

Orders are generally shipped the next day by overnight courier in the U.S. or by Air Mail outside the U.S. Add \$15 per report. Outside the U.S., Canada, and Mexico, add \$25. Rush is also available for computer products. Do not mail rush orders.