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LETTER REGARDING GEORGIA DEPARTMENT OF NATURAL RESOURCES COMMENTS ON DRAFT SAMPLING AND ANALYSIS PLAN RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION FOR BUILDING 1039/SOLID WASTE MANAGEMENT UNIT 9 NSB KINGS BAY GA
6/18/2013
GEORGIA DEPARTMENT OF NATURAL RESOURCES

Georgia Department of Natural Resources
Environmental Protection Division
2 Martin Luther King Jr. Dr., S.E., Suite 1154, Atlanta, Georgia 30334-9000
Judson H. Turner, Director
Land Protection Branch
Keith Bentley, Branch Chief
Phone: 404/656-2833 FAX: 404/651-9425

June 18, 2013

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commanding Officer
Attn: PRKB4
Naval Submarine Base
1063 USS Tennessee Avenue
Kings Bay, Georgia 31547-2606

RE: *Draft Sampling and Analysis Plan; RCRA Facility Investigation Building 1039/Solid Waste Management Unit 9;* Naval Submarine Base (Subase), Kings Bay, Georgia; dated April 8, 2013 and received April 18, 2013.

Dear Sir:

The Land Protection Branch of the Georgia Environmental Protection Division (EPD) has reviewed Subase's Draft Sampling and Analysis Plan for the RCRA Facility Investigation (RFI) at Building 1039/Solid Waste Management Unit (SWMU) 9, dated April 8, 2013 and received April 18, 2013. During that review, the attached comments were generated.

Within sixty (60) days after receipt of this letter, please submit two (2) copies of all revisions that address the above comments to the revised document, and one (1) electronic copy (in PDF format) of the full report. The revised pages should be noted at the bottom with the word "Revised" and the revision date. If you have any questions, please contact Mr. Mo Ghazi or William Powell at (404) 656-2833.

Sincerely,

Amy Potter
Unit Coordinator
Hazardous Waste Management Program

cc: Jim Colter, PW4/SUBASE/Kings Bay
Dana Hayworth, NAVFAC SE Remedial Project Manager

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Draft SAP for the RFI at Buiding 1039/SWMU 9
Naval Submarine Base, Kings Bay, Georgia
Dated April 8, 2013

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1. **General.** This Draft SAP indicates that soil and groundwater samples will only be analyzed for BTEX (Benzene, Toluene, Ethylbenzene, and Xylenes) and PAHs (Polynuclear aromatic hydrocarbons). The RFI Work Plan for Building 1039 dated June 2011, Section 5.3.2, states that soil and groundwater samples will be analyzed for VOCs (volatile organic chemicals) and SVOCs (semi-volatile organic chemicals). Historical sampling results have not been provided to demonstrate that VOCs and SVOCs are not present at the site. Please either provide historical sampling evident that demonstrates that VOCs/SVOCs are not a concern, or revise this SAP and all associated worksheets to correspond with the June 2011 RFI Work Plan for this site.

2. **SAP Worksheet #10: Conceptual Site Model (CSM).**

    a. **Site Geology.** The CSM does not contain a discussion of site or regional geology. Since there are known contaminants in the soil that may leach to the groundwater, please provide a section to discuss the site or regional geology.

    b. **Section 10.2, Page 10-2.** The section summarizes the soil excavation that took place in 2010. The depth of this excavation is not included. Please provide the excavation depth.

    c. **Section 10.4.4, Page 10-5.** This section describes the exposure pathways and receptors. Please add a landscaper scenario since this individual may disturb the subsurface soil when planting trees and bushes.

3. **SAP Worksheet #11: Project Quality Objectives/Systematic Planning Process Statements.**

    a. **Section 11.3, Page 11-3, Project Action Limits (PALs).** This bullet states that soil screening will consist of Industrial and Residential Regional Screening Levels (RSLs) as well as "SSL-Risk" (Generic SSLs in the RSL Table), and that actual screening will be based on available receptors. This screening procedure does not follow EPD's *Guidance for Selecting Media Remediation Levels at RCRA Solid Waste Management Units*[1]. All contaminants should be screened against Residential RSLs only.

    Given the typical sandy nature of soil in this area and the relatively shallow groundwater table (7' below ground surface), please screen all detected contaminants in the subsurface using the default soil screening levels (SSLs) in the RSL Tables, which use a dilution attenuation factor (DAF) of 1, to evaluate leaching to groundwater. Please revise accordingly.

b. **Section 11.5 Analytical Approach.** This section has Decision Rules that state that the extent of contamination is defined by the PALs. However, Subase's Permit HW-014(S&T)-4, Section I.E.7, defines the extent of contamination as the area where hazardous waste, hazardous constituents, or hazardous waste constituents are above method detections limits or background concentrations. Please revise accordingly.

4. **SAP Worksheet #14: Summary of Project Tasks.** The Waste Handling Section, Page 14-5, references Appendix C, which is the lab accreditation. The correct reference is Appendix B. Please revise accordingly.

5. **SAP Worksheet #15: Reference Limits and Evaluation Table.**

   a. **Soil.** This table references "SSL-Risk" as the project action level for human health. The true project action level will be those contaminants that exceed either the Residential RSL or default SSL value (or both).

      Additionally, during the screening process for contaminants of potential concern (COPCs), if detected contaminants do not have an RSL value, they must be identified as COPCs and carried forward to the Risk Assessment phase since surrogate values should not be used for screening purposes. Please revise accordingly.

   b. **Groundwater.** This table references the use of tap water RSL surrogates, which should not be used for screening purposes. Detected contaminants that do not have an RSL value must be carried forward to the Risk Assessment phase. Please revise accordingly.

6. **Appendix B: Investigation Derived Waste Management and Characterization (Sections 6.5 and 6.6).**

   a. Section 6.5.1 states, "Solid, liquid, and PPE [personal protective equipment] waste will be characterized through the use of client knowledge, laboratory analytical data created from soil or groundwater samples gathered during field activities, and/or composite samples from individual containers." This description of how wastes will be characterized is generic and insufficient. Additionally, please remove any reference to composite samples as only discrete samples are acceptable per SW-846. Please include a sampling plan for individual 55-gallon drums containing IDW, referencing the requirements of 40 CFR 262.11 (Hazardous Waste Determination).

   b. Section 6.6 contains the regulatory requirements. Please add 40 CFR 262, specifically §262.11 (Hazardous Waste Determination) and §262.34 (Accumulation Time), to this list.

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[1] http://www.gaepd.org/Files_PDF/techguide/hwb/swmurisk.pdf