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LETTER REGARDING GEORGIA DEPARTMENT OF NATURAL RESOURCES COMMENTS
ON THE DRAFT PHASE I RESOURCE CONSERVATION AND RECOVERY ACT FACILITY
INVESTIGATION WORK PLAN FOR SOLID WASTE MANAGEMENT UNIT 27 NSB KINGS
BAY GA
8/5/2013
GEORGIA DEPARTMENT OF NATURAL RESOURCES

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1154, Atlanta, Georgia 30334

(404) 656-7802; Fax (404) 651-9425

Judson H. Turner, Director

August 5, 2013

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

RE: *Draft Phase I RFI Workplan for Solid Waste Management Unit (SWMU) 27*; Naval Submarine Base (Subbase), Kings Bay, Georgia; dated June 24, 2013 and received June 28, 2013.

Dear Sir:

The Land Protection Branch of the Georgia Environmental Protection Division (EPD) has reviewed Subbase's *Draft Phase I RFI Workplan for Solid Waste Management Unit (SWMU) 27*, dated June 24, 2013 and received June 28, 2013. During that review, the following comments were generated:

1. Section 3, Confirmation Sampling. This Draft Phase 1 RFI Workplan does not state which constituents will be analyzed for in the soil samples. Please revise the work plan to state that all soil samples will be analyzed for metals, volatile organic chemicals (VOCs), and semi-volatile organic chemicals (SVOCs).
2. Section 3.1.1, Soil. This section does not provide reference to the applicable residential screening criteria. All soil samples should be compared to EPA's Residential Regional Screening Levels (RSLs). Please revise accordingly.
3. Section 3.1.1, Soil. This section states that soil sampling will be conducted in accordance with EPD requirements. Please specify that soil sampling will be conducted in accordance with EPA's Field Branches Quality System and Technical Procedures, which can be found at the following website: <http://www.epa.gov/region4/sesd/tbqstp/>.
4. Section 3.1.2, Groundwater. This section states, "If contamination is detected in soil samples above the applicable residential standards then a phase II assessment will address the shallow unconfined aquifer." In order to evaluate the potential for soil leaching to groundwater, the analytical results for subsurface soils must also be compared to the soil screening levels (SSLs) as identified in EPA's RSL table in addition to the Residential RSLs. Please revise accordingly.

5. **Section 3.1.3, Sample Handling and Analysis.** This section states, "Sample preservation details, the type of container used for each sampling effort, as well as a summary of preservation requirements are described in the QAPP (Quality Assurance Project Plan)." Please submit a copy of the QAPP as we have not received a copy of this document.

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,

A handwritten signature in blue ink that reads "Amy Potter". The signature is fluid and cursive, with the first name "Amy" being more prominent than the last name "Potter".

Amy Potter
Unit Coordinator
Hazardous Waste Management Program

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

File: Naval Subase (G)

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