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LETTER REGARDING GEORGIA DEPARTMENT OF NATURAL RESOURCES REVIEW AND  
COMMENTS OF THE DRAFT UNIFORM FEDERAL POLICY SAMPLING AND ANALYSIS  
PLAN SOLID WASTE MANAGEMENT UNIT 27 (SWMU 27) DATED 24 JUNE 2014 NSB  
KINGS BAY GA  
8/14/2014  
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 14, 2014

### **CERTIFIED MAIL** **RETURN RECEIPT REQUESTED**

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

RE: *Draft Uniform Federal Policy–Sampling and Analysis Plan for Naval Submarine Base Kings Bay for Solid Waste Management Unit (SWMU) 27*; Naval Submarine Base (Subase), Kings Bay, Georgia; dated June 24, 2014 and received June 27, 2014.

Dear Sir:

The Land Protection Branch of the Georgia Environmental Protection Division (EPD) has reviewed Subase's *Draft Uniform Federal Policy–Sampling and Analysis Plan for Naval Submarine Base Kings Bay for Solid Waste Management Unit (SWMU) 27*, dated June 24, 2014 and received June 27, 2014. During that review, the following comments were generated:

1. **Title of the Cover Page.** The title of the document on the front page reads as, “*Draft Sampling and Analysis Plan Resource Conservation and Recovery Act Facility Investigation Solid Waste Management Unit 27, Naval Submarine Base Kings Bay*” This title is different than the title listed in the enclosed transmittal letter [i.e., *Draft Uniform Federal Policy–Sampling and Analysis Plan (UFP-SAP) for the Resource Conservation and Recovery Act Facility Investigation (RFI) Solid Waste Management Unit 27, Naval Submarine Base Kings Bay, Georgia*]. Please correct this discrepancy.
2. **Table of Content / Missing Worksheets.** There are several missing worksheets in this document (i.e., #s 2, 3, 4, 7, 8, 13, 16, and 21). In addition, several worksheets are arranged out of sequence. For example, worksheet # 15 (Reference Limit and Evaluation Tables) is placed after worksheet #21, or worksheet # 17 placed after worksheet 12. Please provide the missing worksheet or an explanation for not including the above worksheets, and rearrange all the worksheets in their numeric order.
3. **SAP Worksheet # 10, Conceptual Site Model (CSM).** The report states, “The CSM describes potential contamination routes and possible exposure pathways to human receptors, and serves as the basis for the sampling and analysis program.” However, in Section 10.1 the report states, “Based on observations made during the November 2013 site visit, storm water likely discharges to earthen drainage ditches along USS Casmir Pulaski Drive and USS Henry Clay Boulevard. Although dry during the site visit, the drainage ditches likely discharge to retention ponds approximately 2,000 feet to the southwest.” Therefore, the preliminary CSM should also address the need to evaluate for potential ecological risk, or at a minimum, it should be stated that potential risk to ecological receptors will be addressed separately from this investigation.
4. **SAP Worksheet # 10, Conceptual Site Model (CSM), Section, 10.4.3 Fate and Transport Mechanisms.** Section 10.4.3 states, “Surface water is not present in the immediate vicinity of SWMU

27; therefore, it is unlikely that sediment or surface water media would be impacted as a result of any accidental release from SWMU 27.” While the report acknowledges that the drainage ditch was dry during the November 2013 site visit, this is not an indication that the ditch is intermittent or dry at all times throughout the year. Soil contamination can be spread by storm water runoff. Please provide photographic evidence and additional information (total acreage of the drainage ditch, ecological survey, etc.) to support the claim that the drainage ditch is dry most of the year and thus devoid of aquatic flora and fauna. Earthworms and other soil-dwelling invertebrates among other avian and vertebrates may occupy this habitat.

5. **SAP Worksheet # 11, Page WS11-2.** The report states, “Worksheet #15 identifies the lowest project action level (PAL) currently identified based on applicable screening levels defined above. The laboratory selected for current work and any laboratories selected for future work are expected to achieve limits of quantitation (LOQs) that are low enough to measure constituent concentrations less than the Worksheet #15 PAL.” However, the report does not state how this issue will be specifically addressed in those cases where LOQs exceed PALs. Currently in Worksheet # 15, there are a number of Limits of Detections (LODs)/LOQs and detection limits (DLs), which exceed the PALs. Under such conditions, all constituents with a DL reported above the PAL should be retained for further evaluation in the risk assessment. Please add text to clarify how constituents will be evaluated when the LOQ exceeds the PAL.
  
6. **SAP Worksheet # 15: Reference Limits and Evaluation Table.** For Semi-volatile organic compounds (SVOCs) and Volatile organic compounds (VOCs), it was noted that PALs based on the U.S. EPA RSL were reported in mg/kg, and not µg/kg, as indicated in the table. For example, the RSL for benzo(a)pyrene is listed as 15 µg/kg; however, the PAL based on the RSL is reported as 0.015 µg/kg. It is recommended that the metric units for these values be kept consistent throughout the tables. Based on this update, some of the LOD/LOQs and detection limits now meet the PALs. Please revise the tables accordingly.

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 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

File: Naval Subase (G)

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