
**U.S. Army Corps of Engineers, Savannah District
Formerly Used Defense Sites Program**

PROPOSED PLAN

**Donaldson Air Force Base, Area of Concern-8, Greenville,
South Carolina DERP-FUDS # I04SC009606**



April 2022

THE U.S. ARMY CORPS OF ENGINEERS ANNOUNCES PROPOSED PLAN

This Proposed Plan is presented by the U.S. Army Corps of Engineers (USACE), Savannah District, to facilitate public review and comment on the remedy selection for Donaldson Air Force Base (DAFB), Area of Concern (AOC)-8 located seven miles south of Greenville, South Carolina, in Greenville County (Figure 1). This site is part of the Defense Environmental Response Program (DERP) Formerly Used Defense Sites (FUDS) program. The USACE is the lead agency for investigating, reporting, making remedial decisions, and taking remedial action for DAFB AOC-8 (Figure 2). Results from extensive field investigations are the basis for the recommendation for No Further Action (NFA) for soil and groundwater. A Baseline Risk Assessment (BRA) was conducted at DAFB to evaluate whether potential releases related to former military operations may pose a threat to human health or the environment. The results from the BRA support NFA.

This Proposed Plan highlights key information contained in the Remedial Investigation (RI) for AOC-8. This Proposed Plan is part of the Administrative Record (AR) file. USACE encourages the public to review these documents contained in the file to gain a better understanding of the investigations and other activities that have taken place at DAFB.

USACE is issuing this Proposed Plan as part of its public participation responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) §117(a) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) §300.430(f)(2).

PUBLIC INVOLVEMENT

USACE requests comments from the public on this Proposed Plan. Public comments will be accepted during a public review and comment period from May 9, 2022 through June 8, 2022. A public meeting will be held June 1, 2022.

USACE, in coordination with the South Carolina Department of Health and Environmental Control (DHEC), may modify the proposed path forward presented in this Plan based on new information or public comments submitted during the public comment period. Therefore, the public is encouraged to review and comment on this Proposed Plan.

PUBLIC COMMENT PERIOD:

May 9, 2022, through June 8, 2022

The USACE will accept written comments on the Proposed Plan during the public comment period (see contact information at the end of this notice).

ADMINISTRATIVE RECORD:

For more information on the site, see the Administrative Record at the:

South Carolina
Technology & Aviation Center
2 Exchange Street
Greenville, SC 29605
864-277-7685

and

U.S. Army Corps of Engineers
100 West Oglethorpe Avenue
Savannah, GA 31401

Figure 1 Location of DAFB

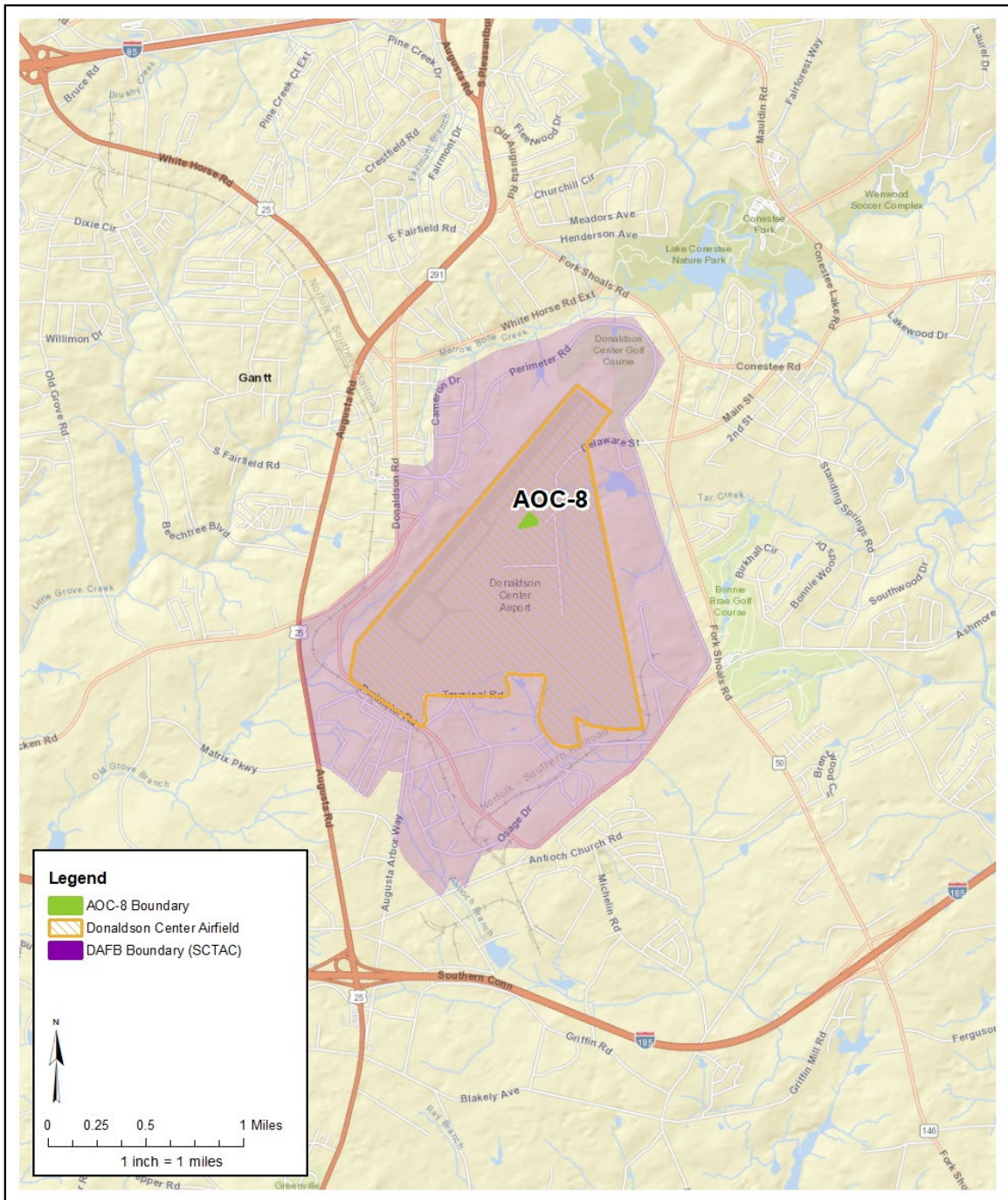
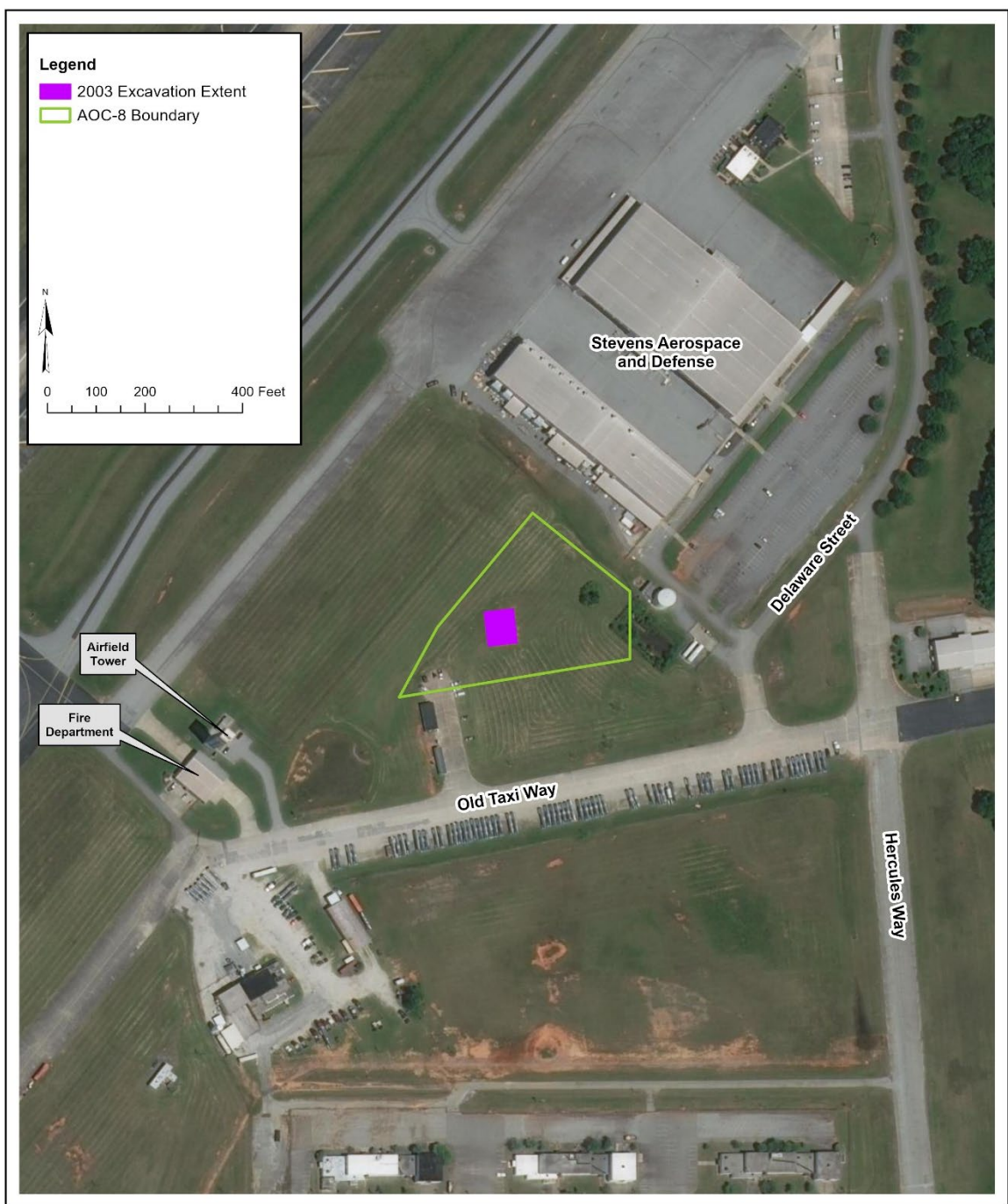


Figure 2 AOC-8 at Former Donaldson Air Force Base



After public comments have been considered, the Decision Document will present the selected Remedy. USACE responses to public comments on this Proposed Plan will be contained in the “Responsiveness Summary” section of the Decision Document.

SITE BACKGROUND

The Department of Defense (DoD) commissioned DAFB in 1942 as the Greenville Army Air Base for the training of B-25 crews. The name was changed in 1951 to Donaldson Air Force Base. Between 1942 and 1963 approximately 390 buildings, an extensive runway and taxiway system, fuel and utility systems, and other facilities were constructed on the 2,482-acre site. The facility was closed in 1963 and the property was transferred to the City and County of Greenville. In the mid-1980s the U.S. Army designated the property to be part of the FUDS program.

The property was named Donaldson Center Industrial Air Park after the transfer. In 2008, the site was renamed South Carolina Technology and Aviation Center (SCTAC). More than 140 advanced manufacturing and technology companies occupy the area managed/owned by SCTAC. An airport, Donaldson Field, operates on the former airfield and is capable of servicing large aircraft.

DAFB property is bound to the north by the Marrow Bone Creek, to the west by Augusta Road (Highway 25), to the south by Interstate 185, and to the east by Fork Shoals Road. The areas not developed are heavily vegetated with pine and hardwood trees and limited undergrowth.

AOC-8 is in the center of the northern section of DAFB. The site is situated next to an active runway. The air traffic control tower and fire department are approximately 700 feet southwest, and runways are approximately 800 feet to the northwest. To the southeast the area is industrial or paved. The nearest open water receptor is a stream approximately 1,000 feet to the east, across a road, exposed pavement, and parking lots. The area around the site was fairly level gently sloping towards the southeast.

AOC-8 is currently an open field that will continue as an open field or be utilized for future expansion

of the industrial park. The land use of the area as an industrial park is not expected to change in the foreseeable future.

Between 1991-2021, multiple subsurface investigations and media sampling were performed to determine the nature and extent of contamination at the AOC-8. Although contaminants of concern (COCs) were identified in the 2021 RI, further evaluation of the information indicates no unacceptable risks are expected.

The *Final Phase I Remedial Investigation Report for AOC-8* was completed in August 1994 by Law Engineering and Environmental Services for USACE-Kansas District. The purpose of the investigation was to identify areas facility-wide that may have been affected by DoD activities. AOC-8, the subject of this Proposed Plan, was one of thirteen AOCs identified. The material found at AOC-8 was characterized as a mound of adhesive containing components of paint, rubber, plastics, and hot-melt adhesive used to retread aircraft tires. The material was a source of contamination to soil and groundwater. Analytical results indicated the material was not a hazardous waste. The total volume of the material was estimated to be not more than a few cubic yards. The RI did not identify shallow burn pits surrounding the mound of adhesive.

A Phase I Site Assessment was completed to further investigate the area surrounding the adhesive mound. Soil excavated near the adhesive mound indicated thin layers of burn residue. The extent of impacted soil and groundwater was identified using direct sensing and temporary groundwater sampling technologies. These screening technologies were followed by soil and groundwater confirmation samples. The results indicated the soil and groundwater were impacted at levels exceeding the DHEC action levels.

Findings of this assessment were reported in the *Final Phase 1 Site Assessment Report for AOC-8* dated October 1999 completed by USACE Savannah District. An additional site assessment was conducted to determine the vertical and lateral extents of the contaminants. The results of this investigation delineated the extent of the soil contamination to a 40 feet northeast of the adhesive mound. The largest extent of groundwater contamination was determined to be

approximately 160 feet downgradient of the source. It was determined that the contamination was localized and is migrating at an extremely slow rate considering the 30 plus years the source has been in place.

During the investigation, it was noted that TCE was detected in the shallow monitoring wells but was also detected in a sample 200 feet cross-gradient location from the source area. Free product was encountered (2 feet thick) in a monitoring well directly north of the. Findings from this assessment were reported in the *Phase 2 Site Assessment Report for AOC-8* dated May 2000 completed by USACE-Savannah District.

The next phase of this project was to develop a remediation strategy to address the soil and groundwater contamination exceeding DHEC standards was recommended.

A focused feasibility study (FFS) was conducted for AOC-8 to evaluate alternatives to remediate soil contamination. The FFS report presented a preferred approach that included excavation and off-site disposal (landfill) of the source material. The findings of the study were presented in *Focused Feasibility Study for AOC-8* dated October 2001 completed by Horne Engineering Services, Inc for USACE-Savannah District.

Source material and additional contaminated soil was excavated from AOC-8 and disposed of it in an approved off-site landfill during February and March of 2003. A total of 3,574 tons of material was excavated and removed from the site.

Soil sampling of the excavated area indicated the source of contamination was removed. Residual contamination was noted but contamination was considered limited in scope. Groundwater samples were collected in April of 2003. The results indicated benzene, TCE, and naphthalene were the remaining contaminants of concern (COCs) at the site. There was overall reduction in COC concentrations. The contaminated zone was reduced to 30 feet by 30 feet area, with the highest concentrations at the northern edge of the original source and excavation area. Findings and activities for this action were detailed in the *Final Post Interim Remedial Action Site Assessment for AOC-8* dated October 2003 completed by Horne Engineering Services, Inc for USACE-Savannah District.

Two separate groundwater sampling events were

completed after the *Interim Remedial Action*. The sampling events were presented in the *June 2004 Sampling Event Report for AOC-8* dated September 2006 and the *Historical Summary Report, AOC-8* dated November 2011 both completed by USACE-Savannah District.

While the results of the 2004 groundwater sampling event indicated COC concentrations above the regulatory levels, the 2011 groundwater sampling results did not have any exceedances. For the first time since 2000, the 2011 event indicated free product detected in two of the monitoring wells located within the excavated area.

REMEDIAL INVESTIGATIONS

During the current remedial investigation five groundwater sampling events, one soil sampling event, additional monitoring well installations, and monitoring well abandonments were completed. Two initial groundwater monitoring events, May and September 2017, were conducted to determine the current status of the site. During both events, free product was encountered in two of the monitoring wells. Based on the previous analytical results, it was determined that groundwater at AOC-8 would be analyzed for volatile organic compounds (VOCs), semi-volatile organics (SVOCs), and metals.

After the first two groundwater sampling events, VOCs exceeding the regulatory levels were benzene and *cis*-1,2-dichloroethene (*cis*-1,2-DCE). The SVOCs exceeding the regulatory levels were naphthalene and 1-methylnaphthalene. Finally, the metals exceeding regulatory levels were arsenic, cobalt, iron, lead, and manganese.

The detections of VOCs, arsenic, and lead were in two monitoring wells installed within the *Interim Removal Action* excavation. Because of the isolated nature of these detections, it was suspected that the older wells may no longer be representative of site conditions. Seven new monitoring wells were installed inside of and around the boundary of that excavation.

Groundwater samples collected from these new wells indicated naphthalene, cobalt, and manganese were detected in exceedance of their respective Environmental Protection Agency (EPA) Tapwater Regional Screening Levels (RSLs). Free product was not encountered, and

no other detections exceeded their regulatory level.

The data collected from the older monitoring wells did not agree with data collected from newly installed monitoring wells. Contaminants found in the older monitoring wells were assumed to be residuals in the older well casing or in the annulus space around the well screen.

In April 2019, soil samples were collected across the site. Iron was the only detection above its regulatory level. This event was followed by a groundwater sampling event. No VOCs exceeded the regulatory limits. Several SVOCs (1-methylnaphthalene and naphthalene) and metals (cobalt and manganese) were detected at concentrations above the respective EPA Tapwater RSLs.

The older monitoring wells were abandoned via overdrilling in January 2020 to prevent the possibility of the monitoring wells from becoming a source of contamination. The process of overdrilling removes all the well casing, the annulus space around the well screen, and soil within five to six inches around the monitoring wells.

In July 2020, the final groundwater sampling event of the RI indicated detections of VOCs, SVOCs, and metals exceeding the EPA Tapwater RSLs.

SUMMARY OF PROJECT SITE RISKS

The Human Health Risk Assessment (HHRA) evaluated potential risks to humans potentially exposed to site - related contaminants present in soil and groundwater based on current and reasonably anticipated future use of the AOC-8.

Given the site setting and the current usage of the AOC-8, an ecological risk evaluation was deemed unnecessary and was not conducted.

The HHRA focused on the populations likely to be exposed to potentially contaminated site media currently and/or in the future. The potential human receptors identified for the AOC-8 included the following:

Trespasser – A site trespasser could be exposed to contaminated site media while trespassing. Because the AOC-8 is located near an active runway and an access is restricted, a trespasser

scenario was not evaluated in this HHRA.

Commercial Worker – A commercial worker could be exposed to groundwater during work -related activities. Future commercial workers could be exposed to tap water from groundwater through ingestion and dermal contact and to vapor from groundwater in indoor air.

Residents – The HHRA conservatively assessed risk based on hypothetical residential development in the future. Although this scenario is considered very unlikely, it was evaluated to estimate the upper limit of the potential risks, and to support an unlimited use and unrestricted exposure alternative, if needed. The future hypothetical residents- child and adult- were counted as receptors that could be exposed to tap water from groundwater and to vapor from groundwater in indoor air.

The HHRA initially entailed comparing site concentrations with risk-based screening levels to determine chemicals of potential concern (COPCs) for each of the media evaluated in the RI. Then, COCs that pose unacceptable long-term risk and that may require further evaluations or remediation to reduce the unacceptable risk were identified by a series of quantitative risk calculations of COPCs for each exposure pathway applicable to a receptor.

Concerning carcinogens, risk to human health is expressed as a probability that an individual will develop cancer over a lifetime because of exposure to a carcinogen. Cancer risk from exposure to carcinogen(s) is expressed as the incremental lifetime cancer risk (ILCR), or the increased chance of cancer above the normal background rate of cancer. In order to assess potential risk to human health, the ILCR is compared against an established risk goal. As allowed by CERCLA, acceptable risk goals may lie within the range of increased cancer risk of one occurrence per million people (1×10^{-6}), up to one occurrence per ten thousand people (1×10^{-4}) (40 CFR 300.430).

For non-carcinogens, the risk to human health is evaluated by comparing an estimated exposure (i.e., intake dose) from site media to an acceptable toxicity value expressed as a reference dose, or RfD. The RfD is the threshold below which no toxic effects are expected to occur in a population. The ratio of intake over the RfD is the Hazard Quotient (HQ). The HQs for each constituent are

summed to obtain a Hazard Index (HI). A hazard index value of less than or equal to 1.0 indicates that no adverse noncancer human health effects are expected to occur.

Soil samples were collected from the site during the April 2019 sampling event. The maximum detected concentrations of the soil samples were compared to the EPA Industrial Soil RSLs in accordance with EPA Regional Risk Assessment Guidance. None of the detections were above the screening values. Therefore, a risk evaluation for soil at the site was determined to be unnecessary. As a result, soil at the site does not present an unacceptable risk..

Based on the analytical results of the July 2020 final groundwater sampling event of the RI, risks were calculated for each receptor for the following COPCs in groundwater: *cis*-1,2-DCE, TCE, indeno[1,2,3-*cd*]pyrene, 1-methylnaphthalene, naphthalene, cobalt, iron, and manganese.

The cumulative ILCR, that is the potential cancer risk from the COPCs through all exposure pathways (e.g., ingestion, dermal contact, and inhalation), was estimated for residents- child (4×10^{-6}) and adult (7×10^{-6}), and a commercial worker (1×10^{-6}). All the cumulative ILCRs were either below or within the acceptable risk range of 1×10^{-6} to 1×10^{-4} , indicating that unacceptable excess cancer risks are not likely at the AOC-8.

The cumulative HI, a measure of potential non-carcinogenic risk from the COPCs through all exposure pathways, was calculated for future residents- child (28.5) and adult (15.9), and a commercial worker (4.5). Since the total HIs for receptors were above the HI threshold of 1.0, more precise HIs were developed for each target organ or toxic effect, as suggested in the EPA Regional Guidance. When considering target organs, the following compounds were determined to be COCs that pose unacceptable non-carcinogenic risk to the receptors: cobalt and manganese.

In addition, *cis*-1,2-DCE, TCE, indeno[1,2,3-*cd*]pyrene, 1-methylnaphthalene, and naphthalene in groundwater were further evaluated for the vapor intrusion (VI) by using the EPA's Vapor Intrusion Screening Level (VISL) calculator, pursuant to the EPA Regional Guidance. A VI carcinogenic risk was estimated for a resident (6×10^{-7}) and a commercial worker (2×10^{-7}); a non-cancer VI hazard index was estimated for a

resident (0.126) and a commercial worker (0.0301). Both the estimated VI cancer risk and non-cancer VI hazard index for each receptor are less than the regulator risk levels, which suggests that there are no unacceptable risks from VI.

The calculated results of the HHRA show that cobalt and manganese via ingestion of groundwater pose unacceptable non-carcinogenic risk to potential receptors. However, as the AOC-8 is adjacent to an airfield and is located within the boundaries of an industrial park, the AOC-8 is currently an open field that will continue as an open field or be utilized for future expansion of the industrial park. The land use of the area as an industrial park is not expected to change in the foreseeable future. It should be noted that cobalt and manganese are common elements found in the local bedrock and saprolite underlying the site. These metals were also detected in up- and cross-gradient monitoring wells.

Groundwater during the July 2020 event flows to the northeast. The sampling results from a monitoring well, located approximately 180-ft northeast of the source, indicated no exceedance of analyzed VOCs, SVOCs, and metals with respect to EPA MCLs. Only, indeno[1,2,3-*cd*]pyrene, in the absence of MCL, had an exceedance of its Tapwater RSL. Thus, it was determined that the COCs continued to be localized to the site. Additionally, drinking water for the surrounding businesses and airfield is supplied by municipal services. These considerations indicate that the exposure pathways of the COCs to potential receptors are deemed to be incomplete.

INVESTIGATION SUMMARY AND CONCLUSION

The 2021 RI for AOC-8 was completed to evaluate the nature and extent of contamination and conduct a HHRA. The HHRA evaluates the risk to potential current and future receptors at the site.

Seven groundwater sampling events have been conducted at this site since the 2003 *Interim Remedial Action*. Three sampling events have occurred since the installation of seven new monitoring wells. One sampling event, in July 2020, has occurred since the abandonment of four monitoring wells in January 2020.

Free product has been noted in the past at this site; however, it was not encountered during the June 2019 or July 2020 groundwater sampling events. The previous detections of free product, benzene, and several chlorinated volatile organic compounds (CVOCs) within and adjacent to the excavation boundary were inconsistent with actual site conditions. The contaminants appear to have been residual contamination trapped in the screen and annulus space of the monitoring wells. Monitoring wells installed adjacent to these four locations, have not shown similar levels of contaminants in three groundwater sampling events. The abandonment of these monitoring wells in January 2020 was completed to mitigate any secondary contamination from these locations.

Several CVOCs have been detected in monitoring wells in exceedance of their MCL on this site since groundwater sampling began in 1998. Barring the detections in the four abandoned monitoring wells mentioned above, there has only been two exceedances of CVOCs in the last six groundwater sampling events. *cis*-1,2-DCE and TCE were detected in exceedance of MCLs in two monitoring wells during the 2004 groundwater sampling event. Groundwater samples collected since 2004 have been below the associated MCL or non-detect. In the 1998 Phase II Investigation, it was proposed that the source of these CVOCs were as likely to be off site as from vertical migration of contaminants from the source area. This is based on the detection of TCE in a cross-gradient sampling location at comparable depths to the deep monitoring wells on site and that groundwater flow direction in the deeper monitoring wells is east-southeast. Concentrations in the deeper wells were consistent with the CVOCs detected in the cross-gradient location.

Naphthalene and 1-methylnaphthalene have been detected in exceedance of the RSLs in two of the monitoring wells. These monitoring wells were installed along the and northern boundary of the 2003 excavation boundary.

Cobalt and manganese have been present on site in soil and groundwater sampling events. The past three groundwater sampling events have shown exceedances in these constituents in the monitoring wells located adjacent to and immediately downgradient of the adhesive mound/burn pit. Iron has also been detected at

these locations but was only in exceedance compared to the EPA Residential Soil RSL in the downgradient location. Monitoring wells considered up, down, and cross gradient to these monitoring wells show detections below their respective RSLs. All three metals are naturally occurring in this saprolite rich environment.

In addition, the *Interim Removal Action* removed soils from the site in 2003, and the detected concentrations in the subsurface soil samples from the April 2019 sampling event did not exceed their respective screening values. Thus, soil at the site was determined to not have a potential risk and was recommended for NFA.

The calculated results of the HHRA show that cobalt and manganese via ingestion of groundwater pose unacceptable risks to future potential receptors; however, exposure pathways of those constituents to current receptors at the site are deemed to be incomplete because drinking water is supplied by the local municipality.

TCE was included as a COPC during this evaluation due to the detection exceeding the EPA Tapwater RSL. Further risk evaluation of TCE indicates that TCE is not considered to be a significant contributor to risk, and therefore is not identified as a COC.

The VOCs and SVOCs detected on this site are not considered to be COCs based on the findings of the HHRA. Based on the current and reasonably anticipated land use of the site, the RI report concludes that the AOC-8 does not pose a threat to the receptors, and remedial action for groundwater is not required.

USACE has coordinated this PP with the DHEC to gain concurrence. However, DHEC does not concur with the proposed action on the basis the groundwater should be restored to potable standards. The BRA indicates no unacceptable risk was identified for current and reasonable future receptors. Therefore, in accordance with CERCLA, USACE has no authority to conduct a response action and is recommending a non-concurrence NFA for AOC-8.

COMMUNITY PARTICIPATION

USACE is providing this information and soliciting public input on the investigation of AOC-8 at DAFB. Announcements were placed in The Greenville News newspaper and project information can be found in the Administrative Record file. The dates for the public comment period, location, and time of the public meeting and the locations of the Administrative Record files are provided on the front page of this Proposed Plan. Public comments will be considered before any action is selected and approved. Representatives from USACE will be present at the meeting to explain the Proposed Plan, listen to any concerns, answer questions, and accept public comments.

Written comments will be accepted throughout a public comment period from May 9, 2022 through June 8, 2022.

Comments and requests for further information on the site should be directed to:

Mr. Steven Fox
Program Manager
Phone: (912) 652-6210
E-mail:

Stephen.M.Fox@usace.army.mil

or

Ms. Cheri Pritchard
Senior Public Affairs Officer
Phone: (912) 652-5014
Email:

Cheri.E.Dragos-Pritchard@usace.army.mil

US Army Corps of Engineers
Savannah District
100 W. Oglethorpe Avenue
Savannah, GA 31401-3604

GLOSSARY OF TERMS

Administrative Record (AR) – A compilation of all documents relied upon to select a remedial action pertaining to the investigation and remediation of the project site.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) – Congress enacted CERCLA (42 USC § 9620 et seq.), commonly known as Superfund, on 11 December 1980. This law addresses the funding for, and remediation of abandoned or uncontrolled hazardous waste sites. This law also establishes criteria for the creation of key documents such as the RI, FS, PP, and DD.

Decision Document (DD) – A report documenting the final action, approved by the lead and regulatory agencies.

Feasibility Study (FS) – The study evaluates possible remedies using the information generated from the Remedial Investigation. The FS becomes the basis for selection of a remedy.

Formerly Used Defense Sites (FUDS) – Locations which were previously under the jurisdiction of DoD and owned by, leased to, or otherwise possessed by the United States at the time of actions leading to contamination by hazardous substances.

National Oil and Hazardous Substances Pollution Plan (NCP) – More commonly called the National Contingency Plan, the NCP is the Federal government's blueprint for responding to both hazardous substance releases.

Proposed Plan (PP) – The plan that identifies the preferred remedial alternative for a site, and is made available to the public for comment.

Remedial Investigation (RI) – An investigation to determine the nature and extent of contamination, assess human health and environmental risks posed by the contaminants, and provide a basis for the development of response action alternatives.

ACRONYMS and ABBREVIATIONS

AOC	Area of Concern
AR	Administrative Record
BRA	Baseline Risk Assessment
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COC	Contaminant of Concern
COPC	Contaminant of Potential Concern
CVOC	chlorinated volatile organic compound
DERP	Defense Environmental Restoration Program
DHEC	South Carolina Department of Health and Environmental Control
DoD	Department of Defense
<i>cis</i>-1,2-DCE	<i>cis</i> -1,2-dichloroethene
EPA	Environmental Protection Agency
DAFB	Donaldson Air Force Base
FFS	Focus Feasibility Study
FUDS	Formerly Used Defense Site
HHRA	Human Health Risk Assessment
HQ	Hazard Quotient
HI	Hazard Index
ILCR	incremental lifetime cancer risk
MCL	Maximum Contaminant Level
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NFA	No Further Action
RI	Remedial Investigation
RfD	Reference dose
RSL	Regional Screening Level
SCTAC	South Carolina Technology and Aviation Center
SVOC	semi-volatile organic compound
TCE	trichloroethene
USACE	United States Army Corps of Engineers
VI	Vapor Intrusion
VISL	Vapor Intrusion Screening Level
VOC	volatile organic compound

USE THIS SPACE TO WRITE YOUR COMMENTS

Your input on the Proposed Plan for the site is important to the U.S. Army Corps of Engineers. Comments provided by the public are valuable in helping us select a final remedy for the site.

You may use the space below to write your comments. Comments must be postmarked by [06/08/2022] and sent to the indicated address. If you have any questions about the comment period, please contact Mr. Steven Fox or Ms. Cheri Dragos-Pritchard

Name: _____

Address: _____

City: _____

State Zip: _____

Comments: _____

Comments and requests for further information on the site should be directed to:

Mr. Steven Fox
Program Manager
Phone: (912) 652-6210
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Or

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