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RESPONSE TO SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL COMMENTS ON DRAFT RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION REPORT ZONE D CNC CHARLESTON SC
7/17/1997
ENSAFE/ ALLEN AND HOSHALL

COMPREHENSIVE LONG-TERM ENVIRONMENTAL ACTION NAVY
NAVAL BASE CHARLESTON
CHARLESTON, SOUTH CAROLINA
CTO-029

RESPONSE TO COMMENTS FOR DRAFT ZONE D RCRA FACILITY INVESTIGATION REPORT (Dated February 19, 1997)

Prepared for:

Department of the Navy
Southern Division
Naval Facilities Engineering Command
Charleston, South Carolina

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South Carolina Department of Health and Environmental Control
Response to Comments
For Draft Zone D RFI Report
Dated February 19, 1997

Comments by Johnny Tapia:

COMMENT

1. This document does not include a lithologic cross section of the area (Zone D). The final document should include lithologic cross sections.

RESPONSE

1. **Due to the limited number of subsurface control points in Zone D only one cross section has been included. Figure 2-2 presents a lithologic cross section of Zone D. This figure can be found on page 2-6.**

COMMENT

2. This document does not include an analytical hits list. The final document should include an analytical hits list.

RESPONSE

2. **Tables 5.4 (page 5-7), 5.7 (page 5-18), and 5.8 (page 5-19) reflect all parameters detected in soil samples, shallow monitoring well samples and deep well samples, respectively in Zone D.**

COMMENT

3. The objective of this RFI is to characterize the nature and extent of contaminants associated with releases, and to evaluate contaminant migration pathways. There are no Solid Waste Management Units (SWMUs) or Area of Concern (AOCs) associated with Zone D. The stated purpose of the Zone D RFI was to ensure that no potential sites are present which were not identified during the RCRA Facility Assessment process.. Analytical data from the lower level sample of grid soil boring #6 indicated extremely low concentrations of Chlorobenzene and 1,1,2,2-Tetrachloroethane. (1.0 and 2.0 parts per billion, respectively). The presence of these chemicals was not discussed in the text. They were presumably dismissed from consideration because the levels detected were below risk based concentrations. This sample location, however, is from a clean grid based location and not associated with a SWMU or AOC. The questions are then;

   A. is this location at the center or edge of the contamination, and
   B. has groundwater been impacted?

The questions are complicated because there are no wells associated with the grid soil boring location #6 and both chemicals have a density greater than water. Before this location may be dismissed and the RFI becomes finalized, shallow and deep groundwater samples should be collected and analyzed for VOCs and SVOCs. CNAV has the responsibility to prove groundwater has not been impacted by an unknown SWMU or AOC at grid soil boring location #6. The use of a Direct Push Technology well would be acceptable. CNAV should submit a monitoring well request no later than two weeks before well construction is to begin.

RESPONSE

3. **To address this comment two additional groundwater samples have been collected at the GDDSB006 location. The discussion of the chlorobenzene and 1,1,2,2-tetrachloroethane detected in soil is contained in Section 5.2, page 5-13. The methodolgy used to collect the groundwater samples can be found in Section 3.2.5, page 3-8. No organic compounds were detected in either the deep or shallow DPT groundwater samples collected. These results are discussed in Section 5.5, page 5-20.**

Response to Comments
Environmental Protection Agency
for Draft Zone D RFI Report
Dated February 19, 1997

Comments by Jay Bassett:

COMMENT

1. Section 4.3 - Zone D Data Validation Reports: Section gives a list of deficiencies and problems but does not give a summary of impact to data and data analysis. Example is if MEK, acetone, chloroform, and MC were found to be lab contaminants, would like to know detected level in blanks, were any media samples screened due to blanks (method or field) and what samples were screened or rejected. Since in two paragraphs, statements were made reflecting blank contamination parameters, need to include effect on data presented in the report.

RESPONSE

1. **Section 4.3 - Data Validation Reports - includes a brief summary of the analytical and validation results of the environmental samples for Zone D. The data validation reports, which are included in Appendix E, give a description of any deficiencies and problems of the field and laboratory method blanks which were noted during the validation process and how they may impact the data of the corresponding samples reviewed.**

COMMENT

2. Table 5.4 - 1,1,2,2-Tetrachloroethane was detected as shown in Table 5.2 at 2 ppb. Table 5.4 does not reflect this contaminant or associated screening levels. In reviewing RBC table, this contaminant exceeds the SSL (soils to gw) number of 2 ppb. While this is a minor exceedance, it needs to be reflected in the table and discussed in the text in Section 5.5.

RESPONSE

2. **Table 5.4, page 5-7 includes 1,1,2,2-tetrachloroethane and has been revised to include associated soil to groundwater screening levels. The USEPA Soil Screening Guidance: Technical Background Document (May 1996) provided soil to groundwater SSLs (DAF=20) for 1,1,2,2-tetrachloroethane of 3 ppb. Based on these values, the chromium detection in GDDSB00502 of 40.7 ppm was the only exceedance. This exceedance is discussed on page 5-14.**

COMMENT

3. I reviewed your inorganic background determination for this zone and accept the rationale and values as final. For this zone I do not believe a meeting or additional data is required for resolution of background as is being conducted for other zones.

RESPONSE

3. Agreed.