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U S NAVY RESPONSE TO REGULATOR COMMENTS TO RFI REPORT ADDENDUM - AREA
OF CONCERN 538 AND 539 (AOCS 538 AND 539) ZONE E WITH TRANSMITTAL CNC
CHARLESTON SC
3/13/2003
CH2M HILL

AOCs 538 and 539 Zone E
RTC RFZ Report Addendum

CH2MHILL TRANSMITTAL

To: Jerry Stamps
South Carolina Department of Health
and Environmental Control
Bureau of Land and Waste
Management
2600 Bull Street
Columbia, SC 29201

From: Dean Williamson/CH2M-Jones

Date: March 13, 2003

Re: CH2M-Jones' Responses to Comments by SCDHEC regarding the *RFI Report Addendum, AOCs 538 and 539, Zone E, Revision 0*

Quantity	Description
4	CH2M-Jones' Responses to Comments by SCDHEC regarding the <i>RFI Report Addendum, AOCs 538 and 539, Zone E, Revision 0</i> – Originally Submitted on October 10, 2002

If material received is not as listed, please notify us at once.

Remarks:

Copy To:

Dann Spariosu/USEPA, w/att
Rob Harrell/Navy, w/att
Gary Foster/CH2M-Jones, w/att

Specific Comments

1. Section 2.5, Air Samples, Page 2-5 and 2-6 and Appendix C.

The text states that Appendix C-1 contains the analytical data per sample from the original Ensafe RFI, and Appendix C-2 contains the comparison tables to the ambient values, RBCs, and TWAs. After reading Appendix C, it appears that C-1 is the comparison table and C-2 is the sample specific table. Please revise the text accordingly.

CH2M-Jones Response:

The text will be changed accordingly.

2. Section 2.5, Air Samples, Page 2-6.

The text states that two of the fifteen air samples contained relatively high concentrations of most of the metals analyzed. The text goes on to state that these samples **may** have been collected from closer to the industrial activity, and the operations in this area **may** have changed with time. Since the Navy is recommending NFA for this site, the Department would like to see a more thorough explanation for excluding the air pathway. Please include a brief discussion of the contaminants that were detected above ambient concentrations / RBCs and that they were not considered COCs in other media. Also include a brief discussion of why the dust inside of the building is not a likely source of contamination at AOCs 538 and 539. The Department concurs with the recommendations in the RFI Addendum; however, additional information would make the conclusions more obvious to the reader.

CH2M-Jones Response:

We agree that a clearer discussion of this issue would be helpful to the reader. After reviewing the air data, in light of the reviewer's comment above, and considering the physical condition and age of Building 6 and its lack of suitability for residential use, we have concluded that it is not reasonable to assume that the Building 6 would ever be used for residential purposes. The residential exposure scenario that provides the basis for calculating the EPA Region III residential air RBCs is simply not going to occur at this site.

In preparing the Revision 0 RFI Report Addendum (RFIRA), the residential air RBC values were used as a relative point of reference, since the EPA Region III Risk Based tables do not provide air RBCs for the industrial use scenario. After reconsidering the information with regard to the reviewer's request to clarify the issue for the reader, we do not believe that comparison of the air data in Appendix C to residential air RBCs is required since the residential exposure scenario is not going to occur in Building 6. We suggest that the comparison of air data in table C-1 be made only to the OSHA time-weighted average (TWA) values, which are already provided in Table C-1, and that the residential air RBCs and "ambient" values be removed from Table C-1. Discussion can be added to Section 2.5 clarifying why the industrial exposure scenario is the only relevant exposure scenario to consider for the air pathway.

As stated on lines 21 and 22 of Page 2-6, none of the detected site inorganic concentrations exceeded the most conservative of the published TWA values which are protective of industrial workers. Since there is no exposure concern from these analytes in air to the industrial worker, and because a residential scenario air pathway will not occur in the building, the air exposure pathway is not of concern at this site.