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LETTER FROM SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL APPROVING RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION REPORT ADDENDUM AREA OF CONCERN 562 (AOC 562) ZONE E CNC CHARLESTON SC
8/20/2002
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

D H E C
PROMOTE PROTECT PROSPER
2600 Bull Street
Columbia, SC 29201-1708

August 20, 2002

Ms. Amy Daniell
Caretaker Site Office
Charleston Naval Complex
CSO 1895 Avenue F
North Charleston, SC 29405

RE: RFI Report Addendum Area of Concern 562, Zone E
Charleston Naval Complex (CNC)
SC0 170 022 560

Dear Ms. Daniell:

The Corrective Action Engineering and the Hydrogeology Sections of the South Carolina Department of Health and Environmental Control (Department) have completed the review of the above referenced document, which was received on August 2, 2002. This review was based upon applicable State and Federal Regulations, and the CNC Hazardous Waste Permit, effective May 22, 2002. The Department hereby approves the above referenced document with the attached conditions. Please submit revised pages in accordance with the attached conditions.

Please be advised that this No Further Action (NFA) determination is based upon currently available data. Additional investigation may be necessary in the future if information becomes available warranting such action. Additionally, since this site is in Zone E, the Department understands that Land Use Controls (LUCs) will be applied to limit the reuse of this site to non-residential use.

Thank you for your cooperation in this matter. If you have any questions or concerns, please contact Jerry Stamps at (803) 896-4285.

Sincerely,

David Scaturo, P.E., P.G., Manager
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

Attachment:
Memorandum from Don Hargrove to Jerry Stamps

cc: Tony Hunt, PE, SOUTHDIV
Rob Harrell, PE, SOUTHDIV
Dean Williamson, PE, CH2M-Jones
Paul Bergstrand, P.G., Hydrogeology
Rick Richter, Trident EQC District
Dann Spariosu, PhD, EPA Region 4
Gary Foster, PE, CH2M-Jones

ENGINEERING COMMENTS
Prepared by Jerry Stamps
Charleston Naval Complex (CNC)
August 20, 2002

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1. **General**
   The primary concern for AOC 562 was the potential release of dielectric fluid from leaking transformers. Samples collected from these leaking transformers showed detections of less than 50 ppm PCBs. Upon review of this document, the Department was initially concerned that the soil samples collected around AOC 562 were not analyzed for metals given the potential for the dielectric fluid to contain metals. However, none of the soil samples resulted in a single detection of PCBs; thus indicating that a release of the dielectric fluid has not occurred. Consequently, it is reasonable to believe that metals contamination has not occurred as a result of a release of the dielectric fluid. As such, the Department has determined that AOC 562 has been adequately investigated and agrees that No Further Action is appropriate. No response is necessary to this comment.

2. **Section 2.2, Wipe Sampling and Analysis**
   This section presents the results of the wipe sampling conducted in the transformer storage area. Sample locations were biased toward areas of the highest possible contamination. Only one of the four samples had a detectable quantity of PCBs at 9.8 $\mu g / cm^2$. However, the location of this detect is not presented in the documents. Please indicate where this single detection occurred.

   Furthermore, there is no rationale as to why this detection is not of concern. The Department recommends using 40 CFR 761.125(c)(4)(ii) under the Toxic Substance Control Act (TSCA) as a reasonable screening tool to determine if additional action is required to remove residual PCB contamination form solid surfaces. This section of TSCA states that, for non-restricted access areas, high-contact outdoor solid surfaces shall be cleaned to 10 $\mu g / cm^2$. Considering the wipe samples have met this criterion, the surface of the storage area does not require any additional cleaning. Please provide this rationale or other rationale deemed appropriate by the Navy to demonstrate that the wipe sample results are not of concern. Please note that this comment applies to any future sites for which PCB wipe sampling was conducted.