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LETTER TRANSMITTING COMMENTS ON ZONE J COOPER RIVER, NOISETTE CREEK,
AND SHIPYARD CREEK TECHNICAL MEMORANDUMS CNC CHARLESTON SC
10/17/2003
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

October 17, 2003

Commander (Amy Daniell)
SOUTHNAVFACENGCOM
2155 Eagle Drive
North Charleston, SC 29406

RE: Comments
Zone J Cooper River SLERA Technical Memorandum
Zone J Noisette Creek SLERA Technical Memorandum
Zone J Shipyard Creek SLERA Technical Memorandum
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 documents, which were received on September 2, 2003. This review was based upon applicable State and Federal Regulations, and the CNC Hazardous Waste Permit, effective May 22, 2002. The Department has determined that the attached comments must be adequately addressed.

If you have any questions or concerns, please contact me at (803) 896-4285.

Sincerely,

Jerry Stamps, Engineer Associate
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

Attachment:

Memorandum from Susan Byrd to Jerry Stamps dated October 17, 2003

cc: Tony Hunt, PE, SOUTHDIV
Rob Harrell, PE, SOUTHDIV
Dean Williamson, PE, CH2M-Jones
Gary Foster, PE, CH2M-Jones

Rick Richter, Trident EQC District
Dann Spariosu, PhD, EPA Region 4
Mansour Malik, Hydrogeology
Susan Byrd, Risk Assessor

MEMORANDUM

TO: Jerry Stamps, Environmental Engineer Associate
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

FROM: Susan K. Byrd, Risk Assessor
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: October 17, 2003

RE: Charleston Naval Base
Charleston, South Carolina
SC 0170022560

Documents:

Zone J Cooper River SLERA Technical Memorandum
Zone J Noisette Creek SLERA Technical Memorandum
Zone J Shipyard Creek SLERA Technical Memorandum
Documents dated August 2003

After review of the above referenced documents the Department has the following concerns:

1.) The Department realizes that this is not the complete SLERA covering all three of the agreed upon migration pathways; however, there is confusion as to how the Navy feels that COPC correlations can be made with the recent effluent water samples and the 1995-1997 sediment samples. Not only has a large amount of time lapsed since the sediment sampling event, but many of the sediment locations have experienced numerous dredging activities by the RDA or the USACE.

Based on the information provided in this technical memorandum, the Department strongly recommends the collection of additional sediment samples in areas that could potentially be impacted from effluent samples with elevated HQ values as well as re-sampling historical sediment locations with elevated HQ values. The collection of the additional samples in strategically agreed upon locations will decrease some of the uncertainty in the SLERA by allowing for an "apples to apples" data comparison of recent sediment and surface water samples.

2.) The Department also recommends that the Navy collect Zone J "anthropogenic background" sediment samples. Most of the sediment samples that have been used for background comparisons at the Navy were collected as part of non-Navy investigations and do not necessarily provide the information needed to make adequate comparisons to the Navy sediment samples. The collection of additional sediment samples for background purposes would also decrease some of the large amount of uncertainty in the SLERA data interpretation as well as aid in the elimination of non-site related COPCs.

If you need any additional information, feel free to contact me at (803) 896-4188.

Zone J Cooper River, Shipyard Creek, and Noisette Creek SLERA Technical Memorandum Response to October 17, 2003 South Carolina Department of Environmental Control Comments

Susan Byrd - Comment 1

After review of the above referenced documents the Department has the following concerns:

The Department realizes that this is not the complete SLERA covering all three of the agreed upon migration pathways; however, there is confusion as to how the Navy feels that COPC correlations can be made with the recent effluent water samples and the 1995-1997 sediment samples. Not only has a large amount of time lapsed since the sediment sampling event, but many of the sediment locations have experienced numerous dredging activities by the RDA or the USACE.

Based on the information provided in this technical memorandum, the Department strongly recommends the collection of additional sediment samples in areas that could potentially be impacted from effluent samples with elevated HQ values as well as re-sampling historical sediment locations with elevated HQ values. The collection of the additional samples in strategically agreed upon locations will decrease some of the uncertainty in the SLERA by allowing for an "apples to apples" data comparison of recent sediment and surface water samples.

Response

The Navy and EnSafe will propose a plan on the collection of additional sediments to eliminate the "uncertainty" to the SLERAs in areas that are potentially impacted by storm water effluent samples with elevated HQ values.

Comment 2

The Department also recommends that the Navy collect Zone J "anthropogenic background" sediment samples. Most of the sediment samples that have been used for background comparisons at the Navy were collected as part of non-Navy investigations and do not necessarily provide the information needed to make adequate comparisons to the Navy sediment samples. The collection of additional sediment samples for background purposes would also decrease some of the large amount of uncertainty in the SLERA data interpretation as well as aid in the elimination of non-site related COPCs.

Response

The Navy and EnSafe agree that prior to the collection of CNC project related sediment samples, Zone J anthropogenic background sediment samples need to be collected to aid in data interpretation. The Navy proposes that a subcommittee for the Zone J project discuss the sediment sampling approach by teleconference by the end of October 2003.