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LETTER TRANSMITTING COMMENTS ON RESOURCE CONSERVATION AND RECOVERY  
ACT FACILITY INVESTIGATION REPORT ZONE C CNC CHARLESTON SC  
5/5/1998  
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

2903-12240



2600 Bull Street  
Columbia, SC 29201-1708

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**CERTIFIED MAIL**

May 5, 1998

Henry Shepard II, P.E.  
Caretaker Site Office  
NAVFACENGCOCM, Southern Division  
1690 Turnbull Avenue  
Building NH-51  
Charleston, SC 29405

Re: Zone C Final RCRA Facility Investigation (RFI) Report  
Dated November 14, 1997  
Charleston Naval Complex  
SC0 170 022 560

Dear Mr. Shepard:

The South Carolina Department of Health and Environmental Control (Department) has reviewed the above referenced Zone C Final RFI Report, the response to comments and additional information received on April 27, 1998. The review was performed according to applicable State and Federal Regulations and the Charleston Naval Base Hazardous Waste Permit effective June 5, 1990. The units (AOCs/SWMUs) located at Zone C are classified as follows:

- |                       |  |
|-----------------------|--|
| SWMU 44               | CMS  |
| SWMU 47 / AOC 516     | CMS  |
| AOC 508 / AOC 511     | CMS  |
| AOC 512               | CMS  |
| AOC 517               | CMS (Lead dust removal is necessary since there are no regulations governing this kind of exposure. Most of zone C is planned to have a residential reuse) |
| AOC 518               | CMS (Candidate for Interim Measures)   |
| AOC 700               | CMS (To be addressed as part of SWMU 44 CMS effort)  |
| AOC 515 / AOC 519     | NFA  |
| AOC 510               | NFA  |
| AOC 513               | NFA  |
| AOC 520               | NFA  |
| AOC 522               | NFA  |
| AOC 523               | (Decision Pending verification that the UST program has or will address the unit, and the base-wide thallium study by the RCRA Subtitle C program.         |
| Ecological subzone C1 | Further evaluation required under the Zone J (water bodies) RFI investigation.   |
| Ecological subzone C2 | No further evaluation required   |
| Ecological subzone C3 | No further evaluation required   |

H. Shepard  
May 5, 1998  
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In addition, at grid location 001 high DDT concentrations were detected. Limited soil removal is recommended.

The Department made the comment and confirmed with EPA, that screening total dioxin detections (TEQs) against the EPA's recommended cleanup level of 1 ppb is not appropriate. This approach departs from the Department's approved use of RBCs for soil ingestion for screening purposes, which if exceeded should be carried out into the risk assessment. Considering that detections of TEQs did not exceed EPA's recommended 1 ppb cleanup level, the Navy is not required to recalculate the risk at units where TEQs were present, however, a qualitative discussion related to dioxins (TEQs) is required for all units at Zone C. This discussion shall be included in a modified Section 11 of the Final RFI Report, that upon receipt of this letter shall be prepared and submitted to the Department.

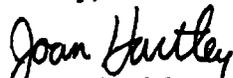
Based on this review, and contingent that the above conditions are met the Department approves the Zone C final RFI report with minor deviations from the decisions reached at the Project Team meeting of April 1998.

It should be noted that according to condition IV.E.2. the permit shall be modified pursuant to R.61-79.270.41. The permit modifications can be made as part of the permit renewal, currently underway. The US EPA has not provided written comments or an approval letter to date.

The Department's concurrence is based on the information provided by the Navy to date. Any new information contradicting the basis for this concurrence may require further investigation or action.

Should you have any questions regarding this issue, please contact Johnny Tapia at (803) 896-4179 or Paul Bergstrand at (803) 896-4016.

Sincerely,



Joan Hartley, Manager  
Corrective Action Engineering Section  
Bureau of Land & Waste Management

cc: Paul Bergstrand, Hydrogeology  
Rick Richter, Trident EQC  
Tony Hunt, SOUTHNAVFACEGNCOM  
Dann Spariosu, EPA Region IV



**FAX MESSAGE**

Date: 11/5/98

Number of pages including Cover Sheet: 3

**Please Deliver This Fax Message**

TO: Todd Haverkost  
Name

ENSAFE  
Organization/Department

(843) 856-0107  
~~(843) 844-2029~~  
Fax Number

( ) 884-0029  
Office Phone

FROM: Jenny Tapia  
Name

Bureau of Land and Waste Mgmt/Div. of  
Bureau/Division/Section

(803) 896-4002  
Fax Number

(803) 896-4179  
Office Phone

**SUBJECT/COMMENTS:**

As requested per your phone message. If you have any questions  
please give a call.

Jenny