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CNC CHARLESTON
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TRANSMITTAL AND RESPONSE TO COMMENTS FOR RCRA FACILITY INVESTIGATION
REPORT ADDENDUM AND CORRECTIVE MEASURES STUDY WORK PLAN AREA OF
CONCERN 723 (AOC 723) ZONE E CNC CHARLESTON SC

6/9/2004
CH2M HILL

AOC 713 Zone E

RtC RFI Report Amendment & CMS Workplan

CH2MHILL TRANSMITTAL

To: David Scaturo
South Carolina Department of Health
and Environmental Control
Bureau of Land and Waste
Management
8901 Farrow Road
Columbia, SC 29203

From: Dean Williamson/CH2M-Jones

Date: August 19, 2004

Re: CH2M-Jones' Responses to Comments by SCDHEC regarding the *RFI Report Addendum and CMS Work Plan, AOC 723, Zone E, Revision 0* – Originally Submitted on June 9, 2004

We Are Sending You:

X	Attached	Under separate cover via	
	Shop Drawings	Documents	Tracings
	Prints	Specifications	Catalogs
	Copy of letter	Other:	

Quantity	Description
2	CH2M-Jones' Responses to Comments by SCDHEC regarding the <i>RFI Report Addendum and CMS Work Plan, AOC 723, Zone E, Revision 0</i> – Originally Submitted on June 9, 2004

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

Copy To:

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

Engineering Comments Prepared by Stephen Crowell

1. Monitoring well E563GW04 is not labeled on Figure 2-2.

CH2M-Jones Response:

Revised Figure 2-2 includes the labeling for E563GW004, which was inadvertently omitted in the Revision 0 report.

2. Vinyl Chloride (MCL – 2ppb) was detected in well E563GW04D at 17.7 ppb (as listed in Table 2-4) but was not discussed in Section 2 as a constituent above screening levels.

CH2M-Jones Response:

The MCL exceedance of vinyl chloride will be discussed in Section 2.2.2.

3. Table 7-1 is missing from the report.

CH2M-Jones Response:

Table 7-1 was included in the Revision 0. An additional copy is attached to these responses.

4. There is no discussion of the suspected source area for the groundwater and soil contamination in the AOC 723 area. Please explain the process for concluding that the contamination is due to a release from AOC 723.

CH2M-Jones Response:

VOCs in groundwater were identified during the RFI for AOC 563, the former Locomotive Maintenance Building, which was located at the current site of Building 177 where AOC 723 is also located. However, the BCT concluded that the source of the VOCs was probably not AOC 563, due to AOC 563's location downgradient from where the VOCs were found.

Subsequently, AOC 723 was identified as an AOC by the CNC BCT, based on the former presence of a paint booth and degreaser operation within Building 177, which had not been identified as an AOC during the initial RFI for Zone E conducted during 1996. Based on the discovery of AOC 723, the BCT concluded that AOC 723 was the more likely source for the VOCs in groundwater. On that basis, the team agreed to assign the source of the VOCs identified beneath Building 177 to AOC 723.

The discussion above will be added to Section 1.1.

Risk Assessment Comments Prepared by Susan Byrd

- 1.) Please provide a figure including the locations of all surface and subsurface soil sample locations with detected concentrations of contaminants in excess of respective screening criteria.

CH2M-Jones Response:

This information will be included in new Figures 2-3 and 2-4.

- 2.) Table 2-1, Surface and Subsurface Soil Detections of VOCs, Page 2-5: Sample E723SB010 under the 1,1-Dichloroethene subsurface soil column should also be highlighted because its concentration of 0.007 is in excess of the SSL of 0.003.

CH2M-Jones Response:

Table 2-1 has been updated to highlight the SSL exceedance of 1,1-DCE in the subsurface soil sample from E723SB010.

TABLE 7-1
 Outline of Focused CMS Report for AOC 723
RFI Report Addendum and CMS Work Plan, AOC 723, Zone E, Charleston Naval Complex

Section No.	Section Title
1.0	Introduction
1.1	Corrective Measures Study Purpose and Scope
1.2	Report Organization
1.3	Background Information
1.3.1	Facility Description
1.3.2	Site History and Background
1.3.2.1	Nature and Extent of Contamination
1.3.2.2	Summary of Risk Assessment
2.0	Remedial Goal Objectives
3.0	Detailed Analysis of Focused Alternatives
3.1	Approach
3.2	Evaluation Criteria
3.3	Description of Alternatives
3.3.1	Soil Alternative 1: Soil Excavation and Disposal
3.3.2	Soil Alternative 2: Land Use Controls
3.3.3	Groundwater Alternative 1: Long-term Monitoring with LUCs
3.3.4	Groundwater Alternative 2: In Situ Remediation
3.4	Detailed Analysis of Alternatives
3.4.1	Analysis of Soil Alternative 1
3.4.1	Analysis of Groundwater Alternative 1
3.4.2	Analysis of Groundwater Alternative 2
3.5	Comparative Analysis of Soil and Groundwater Alternatives
4.0	Recommended Remedial Alternatives
5.0	References
Appendix A	Corrective Measure Alternative Cost Estimates^b
	List of Tables
	List of Figures

^a Additional alternatives will be analyzed, as necessary.

^b Additional appendices will be added, if necessary.