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REGULATORY COMMITTEE RESPONSE TO SOUTH CAROLINA DEPARTMENT OF
HEALTH AND ENVIRONMENTAL CONTROL COMMENTS ON RCRA FACILITY
INVESTIGATION REPORT ADDENDUM AREA OF CONCERN 704 (AOC 704) ZONE E WITH
TRANSMITTAL CNC CHARLESTON SC
11/14/2002
CH2M HILL

AOC 704 Zone E
Response to Comment on RFI 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: November 14, 2002

Re: CH2M-Jones' Responses to Comments by SCDHEC regarding the *RFI Report Addendum, Area of Concern 704, Zone E, Charleston Naval Complex* (Revision 0)

Quantity	Description
4	CH2M-Jones' Responses to Comments by SCDHEC regarding the <i>RFI Report Addendum, Area of Concern 704, Zone E, Charleston Naval Complex</i> (Revision 0) – Originally Submitted on August 6, 2002

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

Remarks:

Copy To:

Jo Cherie Overcash/SCDHEC, w/att
BCT Distribution List

Engineering Comments Prepared by Jerry Stamps

SCDHEC General Comment:

1. The RFI Addendum Sampling Plan (CH2M-Jones, September 2001) stated that the first sample location (SB001) would be located in a depression where paint accumulation has occurred. However, the sampling location identified in this report is located approximately ten feet to the west of the location identified in the sampling work plan. This report must provide the rationale for the deviation from the approved work plan.

CH2M-Jones Response:

Figure 8-2 of the work plan showed an approximate location for SB001, but the resolution of the figure was not sufficient to accurately identify the exact location of the depression. The field team was instructed to sample in the depression, which is where the actual sample was collected.

SCDHEC Specific Comments:

2. Section 4.1.2.

This section states that the surface soil BEQ is below the accepted screening value; however, the calculated value is not provided. Please provide this value in the text.

CH2M-Jones Response:

The calculated values should have been included. The text will be revised to specifically identify the calculated value, the value will be added to Table 4-3, and a new appendix (Appendix C) will be added to show the actual calculations. These will be provided as replacement pages to the existing document.

3. Tables 4-3 and 4-4, Typographical Error.

These tables incorrectly identify the use of the SSL based upon a DAF=1 for screening the semi-volatiles and pesticide. Please revise the table such that an SSL based upon a DAF=10 is identified.

CH2M-Jones Response:

Tables 4-2 and 4-3 will be corrected and replacement pages will be provided.

4. Section 5.1, TCE in Soil.

TCE was detected in one subsurface soil sample at a concentration of 4.3 J ppb. This concentration exceeds that generic SSL of ppb based upon a DAF =1. As agreed in the team notebook, an average concentration was calculated for the area using half of the detection limits for those samples without detectable quantities of TCE. This average concentration, however, still exceeded the SSL screening level. Consequently, a site-specific SSL must be calculated to demonstrate that the TCE concentration in soil does pose a threat to groundwater quality.

Additionally, the Department does not agree with combining the surface and subsurface soil data to calculate a site-wide average concentration for a particular contaminant, as was done for TCE. Instead, the average concentrations used to compare to the SSLs must be depth interval specific. As such, please revise the text in Section 5.1.

CH2M-Jones Response:

A site-specific SSL will be calculated for TCE and Section 5.0 will be revised to discuss the results. These will be provided as replacement pages to the existing document.

5. Data Validation Summary.

It appears as though the majority of the data in this document has been qualified with a "UJ" designation. According to Attachment 1 of the data validation summary, the reason for this qualification is that the holding times were exceeded. However, it does not appear as though an explanation is provided as to why the holding times were exceeded. The Navy must employ its best efforts to ensure that the samples are handled within the holding times as established in the EPA publication SW-846, entitled Test Methods for Evaluating Solid Waste, Physical/Chemical Methods.

CH2M-Jones Response:

The holding time was exceeded because the samples were held an additional 24 hours in the field prior to being shipped to the lab. This is noted on page 6, under Volatile Organic Compounds (VOC) Analysis – Holding Times in the Data Quality Evaluation Summary (Appendix A).

Hydrogeology Comments Prepared by Jo Cherie Overcash

1. Comment.

As requested, a review of the above referenced document has been conducted with respect to the requirements of R.61-79.264 Subpart F of the South Carolina Hazardous Waste Management Regulations (SCHWMRs), the Environmental Protection Agency's (EPA) RCRA Facility Assessment guidance document dated October 1988, and the revised EPA Region IV Environmental Compliance Branch Standard Operating Procedures and Quality Assurance Manual (SOP/QAM) dated May 1996, the CNAV Final Comprehensive Sampling and Analysis Plan dated 30 August 1994, and CERCLA 120(h) as amended.

According to the facility's RCRA Permit modified in April 2002, area of concern (AOC) 704 in Zone E was identified as a paint accumulation area west of Building 301B and was scheduled for confirmatory sampling. AOC 704 is physically located between Dry Dock No.1 and Dry Dock No.2. The quay wall of the Cooper River lies approximately 125 feet to the east. The AOC 704 area exhibited paint spills from past painting operations on the nearby piers. The painting operations began prior to 1973 after which time lead based paints were no longer used. A confirmatory sampling investigation (CSI) of surface and subsurface soils was conducted at AOC 704 during April 2002.

It is good to note that groundwater quality was not evaluated at AOC 704 during this CSI. Based on the available data generated during this CSI, the Division of Hydrogeology concludes that a groundwater investigation at AOC 704 is not warranted at this time. However, if further investigation of surface and/or subsurface soils is conducted at AOC 704 in response to the concerns noted by the Division of Waste Management, the Division of Hydrogeology will re-evaluate the need for a groundwater investigation in this area of the Base.

CH2M-Jones Response:

Thank you for your review. A few issues were raised by the reviewing engineer, Jerry Stamps, and are addressed above. The Division of Hydrogeology will also be provided with any revised materials prepared in response to those comments.