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REGULATORY COMMITTEE RESPONSE TO SOUTH CAROLINA DEPARTMENT OF
HEALTH AND ENVIRONMENTAL CONTROL LETTER REGARDING AREAS OF CONCERN
702 AND 703 (AOC 702 AND 703) ZONE E CNC CHARLESTON SC
8/31/2001
CH2MHILL

AOC 702 and AOC 703 Zone E
LETTER



CH2M HILL
3011 SW Williston Road
Gainesville, FL
32608-3928
P O Box 147009
Gainesville, FL
32614-7009
Tel 352.335.7991
Fax 352.335.2959

August 31, 2001

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Mr. David Scaturo
Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: Zone E – Previously Uninvestigated RFI Units AOC 702 and AOC 703

Dear Mr. Scaturo:

This letter presents CH2M-Jones' proposal to address two AOCs in Zone E that have not yet been investigated. Both of these units, AOC 702 – Pier D Paint Accumulation Area, and AOC 703 – Pier F Paint Accumulation Area (see Figure 1), consist of surficial paint stains on concrete piers. Both units were listed because of the surficial staining that occurred in association with ship maintenance activities conducted at the piers.

A visual inspection of these two units was conducted on July 11, 2001 by CH2M-Jones personnel while preparing for the development of an RFI Workplan addendum. During the visit, it was found that both sites had minor incidental paint spills, which appeared to be old surficial oversprays and minor spills that occurred intermittently along the length of the piers (see Photos 1 and 2). They are essentially indistinguishable from old paint associated with official markings on the piers.

It was discovered that Piers D and F are both constructed of concrete and wood that extends out over the Cooper River (see Photos 3, 4, and 5) and that no environmental media exist between the piers and the Cooper River. The only environmental media that may have been affected are the sediments and surface water of the Cooper River, which are associated with Zone J.

The RFA recommended a Confirmatory Sampling Investigation (CSI) for both sites to characterize the areas of spilled paint, and that any potential impacts to the Cooper River be addressed as part of the Zone J investigation (EnSafe, 1995).

Because there are no soil or groundwater media at these sites to be evaluated, CH2M-Jones recommends that no field investigations or other actions are necessary for AOC 702. As a result, no addendum to the *Zone E RFI Report, Revision 0* (EnSafe, 1997) would be necessary to address either of these units.

The principal author of this document is Kris Garcia. Please contact her at 770/604-9182, extension 476, if you have any questions or comments.

Sincerely,

CH2M HILL

A handwritten signature in cursive script that reads "Dean Williamson".

Dean Williamson, P.E.

cc: Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att
General Distribution

NOTE: Original figure created in color



- Fence
- Railroads
- Roads
- Shoreline
- AOC Boundary
- SWMU Boundary

Buildings

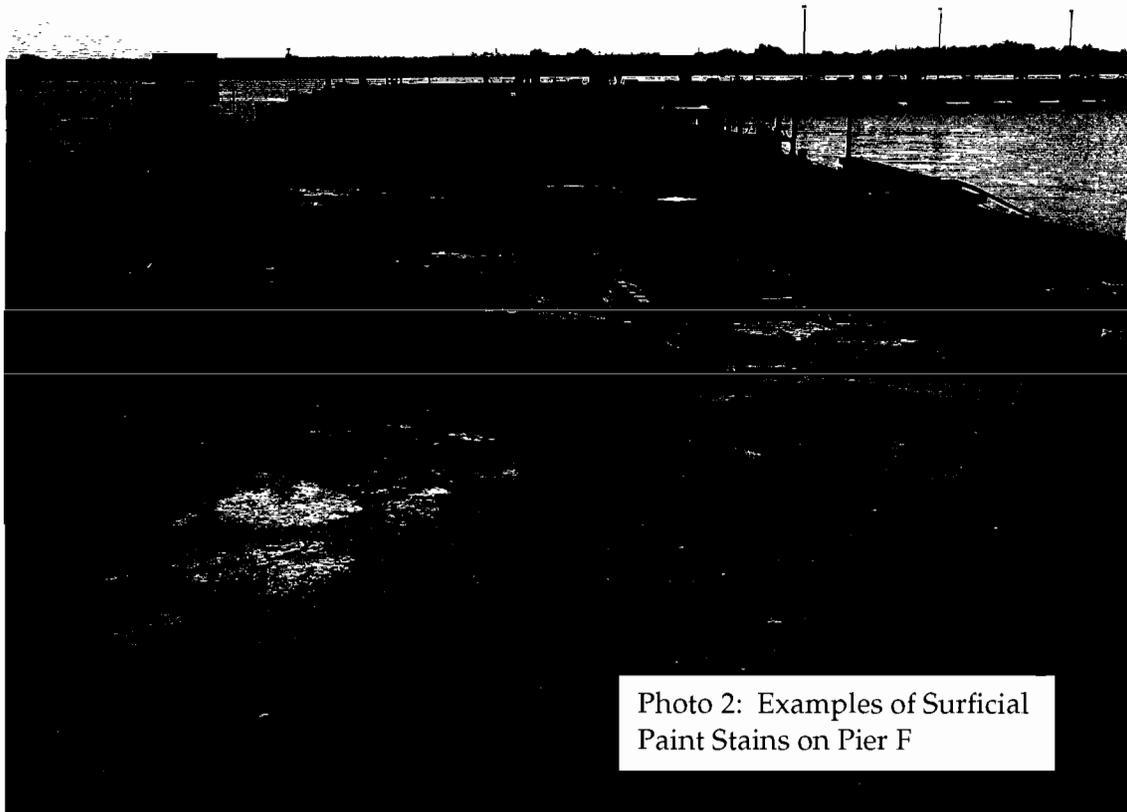
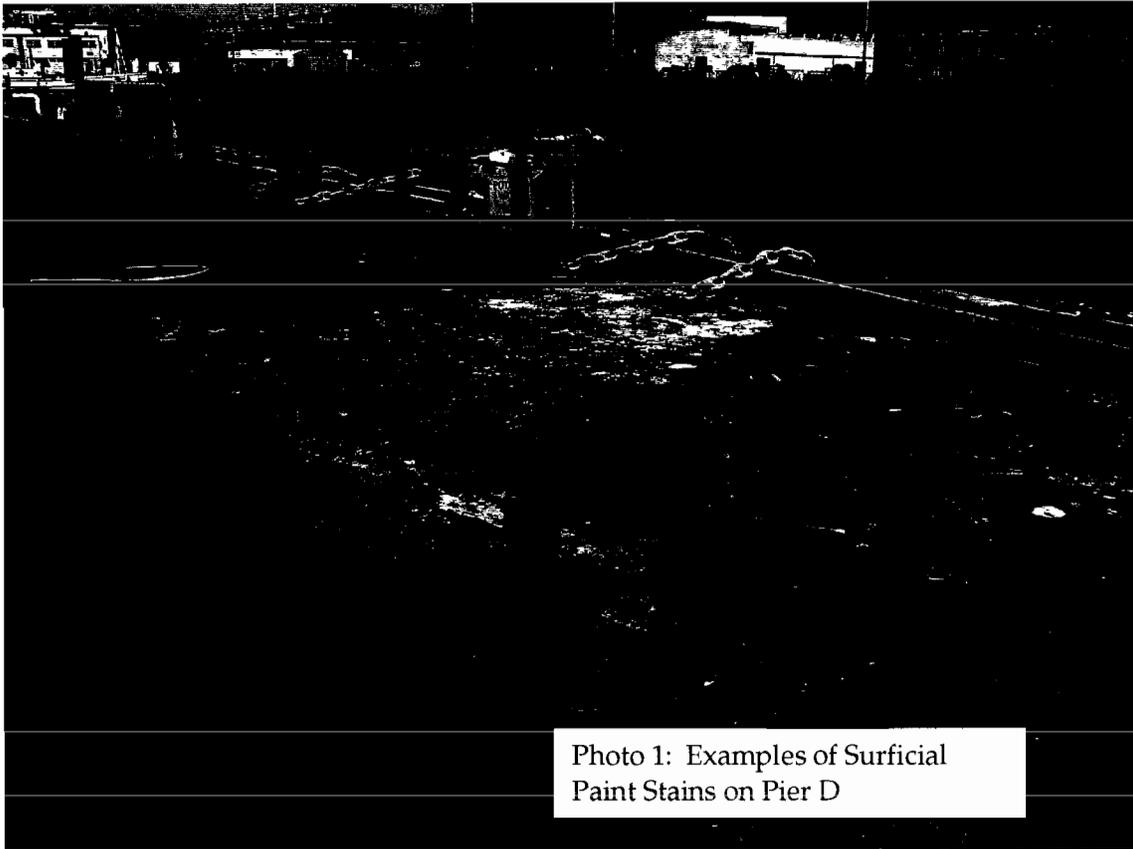


0 200 400 Feet

1 inch = 150 feet

Figure 1
AOC 702 and AOC 703
Zone E
Charleston Naval Complex

CH2MHILL



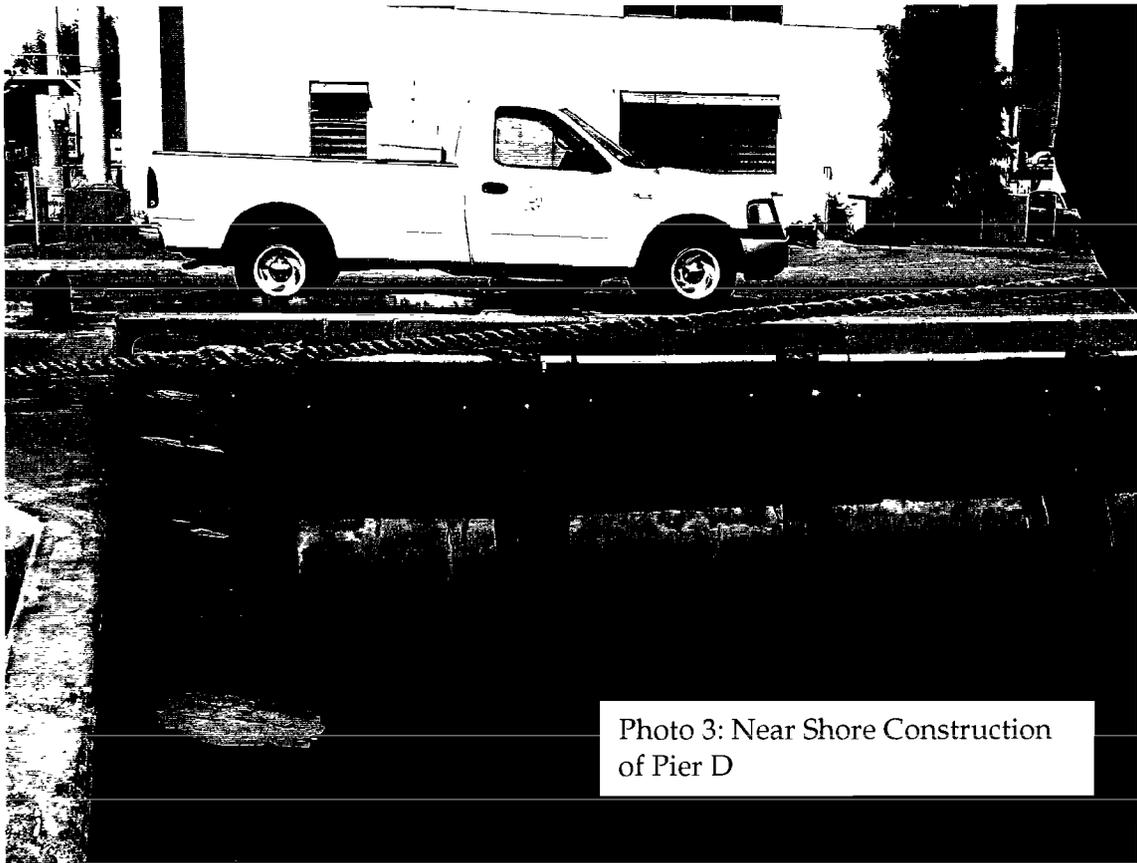


Photo 3: Near Shore Construction of Pier D

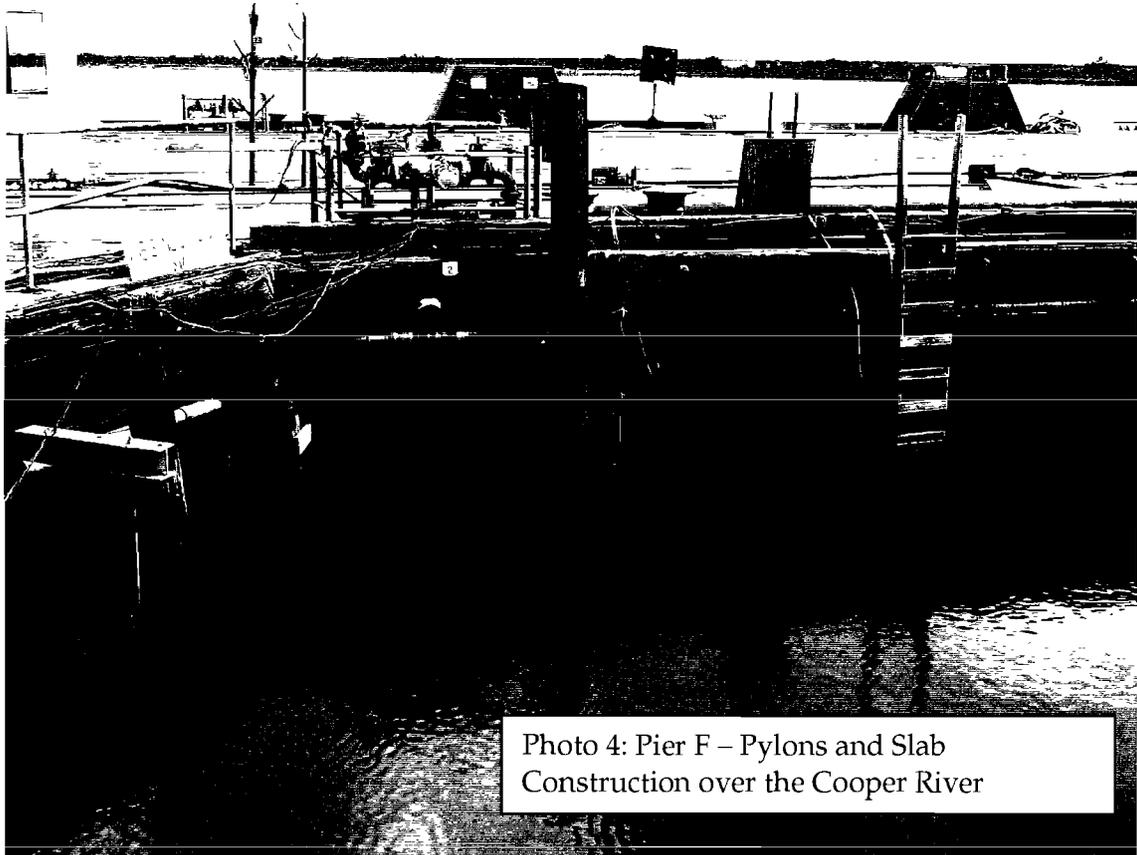


Photo 4: Pier F – Pylons and Slab Construction over the Cooper River

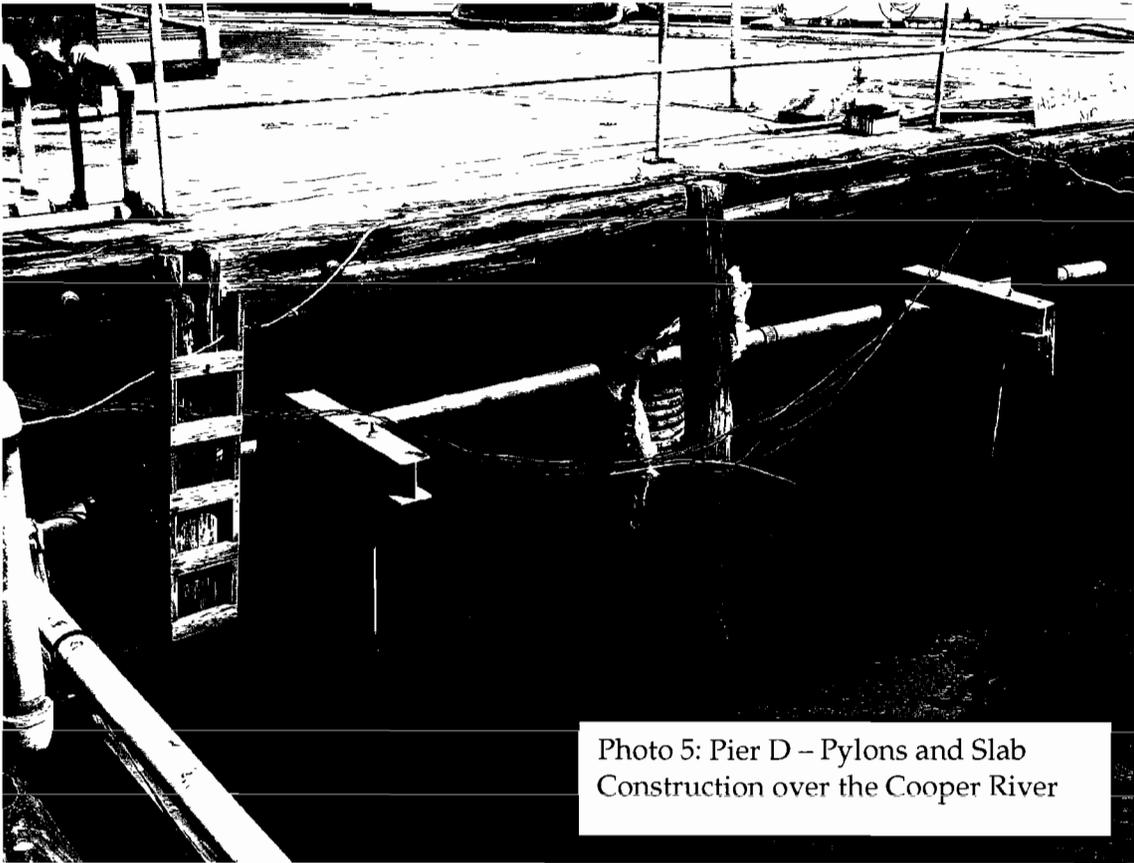


Photo 5: Pier D – Pylons and Slab Construction over the Cooper River