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U S NAVY RESPONSE TO SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS FORMER BUILDING 1225 AREA OF CONCERN
592 (AOC 592) ZONE E CNC CHARLESTON SC
10/1/2002
CH2M HILL

POC 592 Zone E
Letter

CH2MHILL

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October 1, 2002

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

Re: AOC 592, Zone E, Charleston Naval Complex

Dear Mr. Scaturo:

The former Building 1225, Asbestos Shredding Shelter, in Zone E of the Charleston Naval Complex, has been designated as Area of Concern (AOC) 592 in the CNC RCRA Permit, Part B. This AOC was designated for a Confirmatory Sampling Investigation (CSI) in the RCRA Permit and investigated during the Zone E RCRA Facility Investigation (RFI).

The material of concern identified in the Zone E RFI Work Plan for this site was asbestos. During the RFI, five air and 12 soil samples were collected and analyzed for asbestos. There were no detections of asbestos in the air samples and there was only one detection of asbestos in a surface soil sample.

The *Zone E RFI Report, Revision 0* (EnSafe, 1997) recommended no further corrective action for this site. This recommendation of No Further Action (NFA) was concurred with as part of the SCDHEC comments regarding the site. Please see the attached copy of comments prepared by Mr. Charles B. Watson, SCDHEC, in which SCDHEC's acceptance of NFA status for this site is mentioned (see General Comments section).

Based on this concurrence by SCDHEC, CH2M-Jones respectfully requests that the status for AOC 592 be changed to NFA in the CNC RCRA Permit.

Sincerely,

CH2M HILL



Dean Williamson, P.E.

cc: Jerry Stamps/SCDHEC, w/att
Dann Spariosu/USEPA, w/att

Tony Hunt/US Navy, w/att
Gary Foster/SCDHEC, w/att

**Response To Comments from Charles B. Watson — SCDHEC
for Draft Zone E RCRA Facility Investigation Report
Charleston Naval Complex**

General Comment

The Zone E RFI submittal uses industrial RBC's as part of the determination of contamination. And in some cases, an inappropriate industrial RBC was referenced. Sampling results need to be compared to residential RBC values. Therefore, it is requested that all sampling results be re-evaluated based upon residential RBC's from the latest EPA Region III RBC Table. In addition, it is requested that comparison be made in the same units as the table. Based upon review of the RFI as submitted, only AOC's 571 and 592 are recommended for NFA classification.

Response to General Comment

The screening of analytical results for Zone E had been previously discussed in Project Team meetings. It was agreed upon by the Project Team, including SCDHEC representatives, that Zone E data be screened using industrial RBCs. This approach was again submitted in the pre-submittal review for the Draft Zone E RFI Report and the Project Team again had a chance to comment and were fine with the approach. Residential and industrial RBCs were used in the risk assessment to select COPCs for the site worker and residential scenarios. Both residential and industrial RBC comparisons are presented in the CPSS tables in the site-specific risk assessments of the Draft Zone E RFI Report. In the final Zone E RFI Report the reader will be referred to the appropriate sections for comparisons to residential RBCs.

Site-Specific Comments and Responses

SWMU 23/63, AOC 540/541/542/543

Comment 1

Page 10.4-1. The report accounts for operations at AOC 541 from 1909 to 1939 and demolition in 1970; however, no information exists for the operation between 1939 and 1970. The Navy should investigate the history of the building.

Response 1

The history of the building will be further investigated and included in the Final Zone E RFI Report.

SWMU 65, AOC 544/546

Comment 2

Page 10.6-33 (Table 10.6.6.2). Lead exceeded industrial soil RBC (1,300 mg/kg) with 3,130 mg/kg. More sampling is required for this area.