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TRANSMITTAL FOR RESOURCE CONSERVATION AND RECOVERY ACT FACILITY
INVESTIGATION REPORT ADDENDUM AND CORRECTIVE MEASURES STUDY WORK
PLAN FOR AREAS OF CONCERN 530 AND 531 (AOC 530 AND 531) ZONE E CNC
CHARLESTON SC
1/17/2002
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

61 Forsyth Street SW
Atlanta, Georgia 30303-3104

January 17, 2002

4WD-FFB

Mr. M.A. Hunt
BRAC Environmental Coordinator
Code 18710
Department of the Navy
Southern Division, NAVFAC
2155 Eagle Drive
North Charleston, South Carolina 29419-9010

SUBJ: Charleston Naval Complex (CNAV)
RFI Report Addendum and CMS Work Plan, AOCs 530/531, Zone E

Dear Mr. Hunt:

The Environmental Protection Agency, Region 4 (EPA) has reviewed the above referenced document. Please find the comments enclosed.

Please contact me at (404) 562-8552 or spariosu.dann@epa.gov with any questions or responses regarding the enclosed comments.

Sincerely,

Dann J. Spariosu, Ph.D.
Remedial Project Manager

Enclosure

cc: D. Scaturo, SCDHEC
D. Williamson, CH2M-Jones
G. Foster (email), CH2M-Jones
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RFI REPORT ADDENDUM AND CMS WORK PLAN
AOC 530/531, ZONE E
Charleston Naval Complex
North Charleston, South Carolina
December 2001

GENERAL COMMENT

1. The RFI Addendum's recommendation that a Corrective Measures Study should be performed is supported by the data presented. However, a few specific comments should be resolved.

SPECIFIC COMMENTS

1. Page 3-1. The text states that the RFI indicated the presence of a UST at AOC 531, based upon a registration document. The text states, however, that there is no evidence that a tank is located at AOC 531. Additional information should be presented detailing the investigative steps taken to locate the reported tank. Also, in light of the conversations at the January BCT Meeting, it may be appropriate to transfer AOC 531 to the State UST program.
2. Page 6-2, Section 6.5. The RFIRA has used the former presence of a rail line in the area of AOCs 530/531 to help eliminate elevated arsenic concentrations as a COC in this area. However, this section indicates that the former rail line will not be included in the AOC 504, Investigated Rail Lines, evaluation. A clear discussion of how the former rail lines could be a source of elevated contaminated concentrations and yet not be evaluated as part of the rail line investigation should be included in the text.