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SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL ON  
RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION REPORT  
ADDENDUM FOR AREAS OF CONCERN 602, 603 AND 604 (AOC 602, 603 AND 604) AND  
SOLID WASTE MANAGEMENT UNIT 106 (SWMU 106) ZONE

1/16/2002

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2600 Bull Street  
Columbia, SC 29201-1708

January 16, 2002

Ms. Amy Daniell  
Caretaker Site Office  
Charleston Naval Complex  
CSO 1895 Avenue F  
North Charleston, SC 29405

RE: Responses to comments on the RFI Report Addendum, Revision 0, AOC 602, AOC 604,  
and SWMU 106/AOC 603, Zone E  
Charleston Naval Complex (CNC)  
SC0 170 022 560

Dear Ms. Daniell:

The Corrective Action Engineering and the Hydrogeology Sections of the South Carolina Department of Health and Environmental Control (Department) have completed the review of the above referenced document, which was received via email on December 10, 2002. A teleconference was held on January 15, 2002 between the Department (Jo Cherie Overcash and Jerry Stamps) and CH2M-Jones (Kris Garcia) to discuss the outstanding issues that were not resolved in the draft responses to comments. As discussed in the teleconference, the Department has determined that the attached comments must be addressed prior to receiving a final determination with respect to the above referenced document.

Thank you for your cooperation in this matter. If you have any questions or concerns, please contact me at (803) 896-4285.

Sincerely,

Jerry Stamps, Engineer Associate  
Corrective Action Engineering Section  
Division of Waste Management  
Bureau of Land and Waste Management

Attachment

cc: Tony Hunt, PE, SOUTHDIV  
Rob Harrell, PE, SOUTHDIV  
Dean Williamson, PE, CH2M-Jones  
Gary Foster, PE, CH2M-Jones

Rick Richter, Trident EQC District  
Dann Spariosu, PhD, EPA Region 4  
Jo Cherie Overcash, Hydrogeology

ENGINEERING COMMENTS  
Prepared by Jerry Stamps  
Charleston Naval Complex (CNC)  
January 16, 2002

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**AOC 602**

1. **Response to Comment #2**

The response to this comment states that a combined risk of  $1.81 \times 10^{-6}$  was calculated in the Zone E RFI Report, Revision 0 (Ensafe 1997). However, this risk calculation only considered the PCBs Aroclor 1258 and 1260. The dioxin concentrations were not considered in this risk calculation. Therefore, as discussed in the October 10, 2001 BCT, the dioxin concentrations must be carried through the risk assessment to evaluate the risk posed by such concentrations of dioxins. If it is determined that the dioxin levels pose an unacceptable risk, then the action level specified in the EPA memorandum *Approach for Addressing Dioxins in Soil at CERCLA and RCRA Sites*, dated April 13, 1998 may be used as a justification for not remediating the site based upon the existing concentrations of dioxins.

**SWMU 106/AOC 603**

2. **Response to Comment # 4**

The intent of the original comment was to suggest the use of the same language presented in the CNC Team Notebook when describing the screening process. The Department recommends eliminating the use of terms such as the Tier I – Tier II approach, as used by Ensafé, since such terms are inconsistent with the description in the team notebook. Though the process may be the same, using consistent language will avoid confusion for future readers of this document.

3. **Response to Comment # 5**

This response states that one would expect to see arsenic above screening levels in the surface soils if the blasting operations were the source of the arsenic concentrations. However, in response to Jo Cherie's comment # 3E it is stated that this area was originally channelized and was filled during the construction of Dry Dock #4. Therefore, one may conclude that what was originally surface soil is now subsurface soils due to filling activities. In fact, it is entirely possible that the surface soil (now subsurface soils) were impacted during the blasting operations.

With this said, during the teleconference held with CH2M-Jones on January 15, 2002, Kris Garcia notified the Department that the construction and operational history of this site is well documented. In fact, according to Kris, Dry Dock #4 was constructed prior to the blasting operations. Therefore, it appears that the blasting operations occurred on a concrete surface; thus, minimizing the likelihood of surface soil contamination. As agreed in the teleconference, Kris will provide the construction and operation history of this site in response to this comment.