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TRANSMITTAL FOR U S EPA REGION IV COMMENTS ON REMEDIAL FACILITY
INVESTIGATION REPORT ADDENDUM AND CORRECTIVE MEASURES STUDY WORK
PLAN AREAS OF CONCERN 613 AND 615 (AOC 613 AND 615) AND SOLID WASTE
MANAGEMENT UNIT 175 (SWMU 175) ZONE F CNC CHARLESTON SC

5/20/2002

U S EPA REGION IV

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4



61 Forsyth Street SW
Atlanta, Georgia 30303-3104

May 20, 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: Remedial Facility Investigation Report Addendum and Corrective Measures Study
Work Plan
AOC 613/AOC 615 /SWMU 175, Zone F
Charleston Naval Complex (CNC)
SC0 170 022 560**

Dear Mr. Hunt:

The Environmental Protection Agency, Region 4 (EPA) has reviewed the above referenced document. Our comments are 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

cc: D. Scaturo, SCDHEC
D. Williamson, CH2M-Jones
G. Foster (email), CH2M-Jones
J. Stamps (email), SCDHEC

**EPA Comments on the
RFI Report Addendum and
CMS Work Plan AOC 613/AOC 615 /SWMU 175, Zone F
Charleston Naval Complex
North Charleston, SC**

SPECIFIC COMMENTS

Page 4-1, Line 18. It is stated that soil borings for AOC 613 were sampled at depths of 0 to 1 ft bls and 3 to 5 ft bls. Thus, it appears that soil in the 1 to 3 ft bls range was not sampled. Rationale should be provided for not sampling in the 1 to 3 ft bls range. The uncertainty associated with not analyzing samples at this depth should also be discussed.

Page 5-7, Line 28. It is stated that manganese is a nutritionally essential element. According to EPA Region 4 guidance, the only chemicals considered to be essential nutrients for the purposes of contaminant evaluation are calcium, chloride, iodine, magnesium, phosphorus, potassium, and sodium. This statement should be removed from the text.

Page 5-18, Line 12. Iron and manganese exceeded background and RBC values but were not selected as COPCs because they are nutritionally essential elements. According to EPA Region 4 guidance, the only chemicals considered to be essential nutrients are calcium, chloride, iodine, magnesium, phosphorus, potassium, and sodium. This statement should be removed from the text. As explained later, the rationale presented in Section 5.1.1 supports the exclusion of iron and manganese from being considered COPCs.

Page 5-18, Line 15. The text states that three chemicals were not considered COPCs due to their low frequency of detection (< 5 percent), in accordance with EPA Region 4 policy. In fact, Region 4's policy does not allow for a chemical to not be considered a COPC, solely based on frequency of detection. This statement should be removed from the text. As explained later, the rationale presented in Section 5.1.2 supports the exclusion of 1,1,2,2-tetrachloroethane, 1,1-dichloroethene, and vinyl chloride from being considered COPCs.