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U S EPA REGION IV COMMENTS ON REMEDIAL FACILITY INVESTIGATION ADDENDUM
AND CORRECTIVE MEASURES WORK PLAN AREA OF CONCERN 572 (AOC 572) CNC
CHARLESTON SC
5/10/2002
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

61 Forsyth Street SW
Atlanta, Georgia 30303-3104

May 10, 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

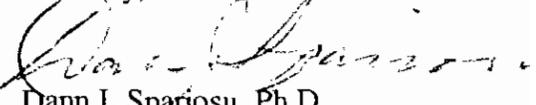
SUBJ: AOC 572 Remedial Facility Investigation Addendum and Corrective Measures Workplan
Charleston Naval Complex (CNC)

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
J. Stamps (email), SCDHEC

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**EPA Comments on the
RFI REPORT ADDENDUM
Area of Concern 572, Zone E
Charleston Naval Complex
North Charleston, SC**

SPECIFIC COMMENTS

1. **Page 2-2, Line 8.** The text states that no inorganics exceeded the screening criteria in surface soil. According to the data shown on Figure 2-2, lead had a concentration of 440 mg/kg in sample E572SB006, which did exceed the screening criteria of 400 mg/kg. The text should be edited to state that lead was detected above its screening criteria.
2. **Page 2-4, Line 7.** The paragraph states that only BEQs were retained as COCs for surface soils. The text further states that lead was not included as a surface soil COC in the initial RFI because the site wide average lead concentration of 116 mg/kg in surface soils was below the unrestricted land use criterion and Zone E background. However, lead in sample E572SB006 (440 mg/kg) exceed its screening criteria and had a sub-surface concentration of 5,230 mg/kg, therefore, lead should have been considered a COC in surface soil due to a "hot spot" of potential lead contamination. It is recognized that the text presented in this section is based on a historical review of the initial RFI. However, additional text should be added to this section discussing the failure of the initial RFI to address this potential "hot spot" of lead contamination.
3. **Figure 2-2.** In this figure, several constituents and their associated concentrations are depicted in bold. It is assumed that the bold values indicate constituents having concentrations greater than their associated screening values. For clarity, the Figure's legend should be edited to state why certain constituents are depicted in a bold font.
4. **Figures 4-1 and 4-2.** For clarity, legends should be added to these figures.