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SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
COMMENTS ON INTERIM MEASURE WORK PLAN SOIL AND NAPL REMOVAL SOLID
WASTE MANAGEMENT UNIT 17 (SWMU 17) ZONE H CNC CHARLESTON SC
9/24/2002
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2600 Bull Street
Columbia, SC 29201-1708

September 24, 2002

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

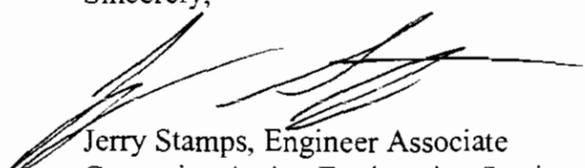
RE: Comments
RFI Report Addendum for AOC 550, Zone E
Charleston Naval Complex (CNC)
SC0 170 022 560

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 on July 25, 2002. This review was based upon applicable State and Federal Regulations, and the CNC Hazardous Waste Permit, effective May 22, 2002. The Department has determined that the attached comments must be adequately 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:

Memorandum from Jo Cherie Overcash to Jerry Stamps dated September 23, 2002

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)
September 24, 2002

1. **Section 2.0**

The investigation at AOC 550 has resulted in the widespread detection of PAHs, particularly in the subsurface soil. The Navy must calculate a BEQ for the PAHs and screen the result against the appropriate screening value defined in the *CNC Project Team Notebook and Instructions* (December 2001). Furthermore, the Navy must calculate a TEQ value for the detected dioxins and compare the result to the corresponding EPA Region III Residential RBC. If the calculated TEQ value exceeds the residential RBC, the Navy must demonstrate that the detectable quantities of dioxins do not pose an unacceptable risk to human health.

2. **Figure 2-1**

AOC 550 appears to have been identified at two separate locations; however, the investigation was focused on the southern location. Only one sample was collected within the vicinity of the northern location for AOC 550. The Navy must provide the rationale as to why the investigation focused on the southern location, and justify why further investigation is not necessary for the northern location.

3. **Section 5.0, Table 5-1**

As included in other RFI Report Addenda, the Navy should include a table identifying all detectable quantities of organic constituents with a column for the EPA Region III Residential RBC for the sake of comparison. Table 5-1 identifies the detectable quantities of Carbon Disulfide and Methyl Ethyl Ketone; however, the PAHs, 1,3-dichlorobenzene, and 1,4-dichlorobenzene were omitted from this table.

4. **Section 7.0**

This section states that "...there are no soil COCs for the industrial land use scenario...". This section further recommends a No Further Action (NFA) determination for AOC 550. In order to obtain a NFA, the Navy must demonstrate that the contamination is below the EPA Region III Residential RBC and/or background reference concentration, as applicable. It appears as though the surface soil data was compared only to the Industrial RBC. As such, the Department cannot grant a NFA determination for AOC 550 at this time.