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SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL  
COMMENTS ON INTERIM MEASURES WORK PLAN ZONE G DATED 31 MARCH 1998 CNC  
CHARLESTON SC  
5/18/1998  
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



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May 18, 1998

Mr. Henry Shepard II, P.E.  
Caretaker Site Office  
Naval Facilities Engineering Command, Southern Division  
1690 Turnbull Ave., Building NH-51  
Charleston Naval Complex  
Charleston, SC 29405

Re: Interim Measures Work Plan  
for Zone G PCB Samples Locations  
Dated March 31, 1998  
SC0 170 022 560

Dear Mr. Shepard:

The Department's Corrective Action Engineering Section and Hydrogeology Division have reviewed the above referenced Interim Measures Work Plan according to applicable State and Federal Regulations and the Charleston Naval Base Hazardous Waste Permit, effective June 5, 1990. Based on this review the Department believes that the Charleston Naval Base needs to modify the Work Plan according to the attached comments.

The nature of the comments generated do not preclude the Department from conditionally approving the work plan, however, upon receipt of this letter please make the specified changes and resubmit the Interim Measure Work Plan for the Zone G PCB Sample Locations to the Department and U.S. EPA for a final review and approval.

Should you have any questions regarding this issue, please contact me at (803) 896-4179 or Paul Bergstrand at (803) 896-4016.

Sincerely,

*Joan Hartley*  
Joan Hartley, Manager  
Corrective Action Engineering Section  
Bureau of Land & Waste Management

Attachments

cc: Paul Bergstrand, Hydrogeology  
Rick Richter, Trident EQC  
Tony Hunt, SOUTHNAVFACENCOM  
Reece Batten, SOUTHNAVFACENCOM  
Dann Spariosu, EPA Region IV

**SCDHEC COMMENTS ON INTERIM MEASURES  
WORK PLAN FOR ZONE G  
PCB SAMPLES LOCATIONS  
PESTICIDE MIXING AREA**

Johnny Tapia P.

1. The Work Plan should describe the approximate area of the removal work to be performed. As written the work plan does not provide this information which is important for the resource and cost planning. Delays on the work completion should be avoided.
2. According to Figure 2, seems that the Work Plan should propose more confirmatory sample because of the expected shape of the excavation. In general, confirmatory samples are expected to adequately cover the area of excavation without leaving any data gaps.
3. Figure 1 shows the apparent extent of the PCB contamination. However, samples taken stopped at the edge of Hobson Avenue. A reasonable number of samples should be collected at the other side of Hobson Avenue to ensure that the extent of PCB contamination has not reached or started on the other side of Hobson Avenue.
4. The revised Work Plan should include an schedule for the implementation of the Interim Measures Work Plan and for the Interim Measures Report submittal.