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CNC CHARLESTON
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EMAIL DISCUSSING U S NAVY RESPONSE TO COMMENTS ON INTERIM MEASURES
WORK PLAN FOR AREA OF CONCERN 607 (AOC 607) CNC CHARLESTON SC
5/11/2001
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

Harrell, Robert (Efdsouth)

From: Mihir Mehta [MehtaM@COLUMB34.DHEC.STATE.SC.US]
Sent: Friday, May 11, 2001 10:44 AM
To: chudson@ch2m.com; dwilliam@ch2m.com; gfooster1@ch2m.com; Harrell, Robert (Efdsouth);
Hunt, Tony (Efdsouth)
Cc: BERGSTPM@COLUMB34.DHEC.STATE.SC.US;
BOWERSJB@COLUMB34.DHEC.STATE.SC.US;
SCATURDM@COLUMB34.DHEC.STATE.SC.US
Subject: AOC 607 IM Work Plan Response to Comments

I and Paul are in agreement with the comment responses. One issue about the site boundary was discussed during the PM meeting on 5/9/01 and clarified. It appears that there is no need to revise the document but submit the responses formally for the completion of the administrative record file.
thank you.
mihir



ENSAFE INC.

ENVIRONMENTAL AND MANAGEMENT CONSULTANTS

313 Wingo Way • Mt. Pleasant, South Carolina 29464 • Telephone 843-884-0029 • Facsimile 843-856-0107 • www.ensafe.com

May 7, 2001

Mr. Rob Harrell
Commander, Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
Charleston, SC 29419-9010

RE: Mercury vapor analysis of Building 664

Dear Rob:

In response to your request on May 2, 2001, EnSafe performed a mercury vapor survey of Building 664 on May 4, 2001. The survey was completed using a Mercury Vapor Analyzer MV-2, which continually monitors and provides immediate results of mercury content in ambient air.

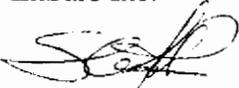
A walking survey was completed for the entire interior area of the building according to manufacturer specifications. Since mercury vapors are more dense than air, the instrument was placed on the floor at several locations throughout the building and allowed to continuously monitor the air for at least one minute. Several areas were also the focus of direct monitoring. Fire water piping, electrical conduit, dehumidifier gauges, spent fluorescent bulbs, and an abandoned food warmer were monitored along with the open spaces. The exterior foundation was also surveyed where there were apparent holes or cracks leading underneath the building.

There was no instrument response indicating the presence of mercury vapors at any location inside or outside the building. The detection limit of the instrument is 0.01 milligrams per cubic meter (mg/m^3), which is below the indoor air quality standards set by the Occupational Safety and Health Association (OSHA) Permissible Exposure Limit (PEL) at $0.10 \text{ mg}/\text{m}^3$ and the National Institute of Occupational Safety and Health (NIOSH) Recommended Exposure Limit (REL) at $0.05 \text{ mg}/\text{m}^3$. These standards are based on exposure over an 8-hour time weighted average. Based on the detection limits of the instrument, no mercury vapors were detected exceeding these standards.

Mr. Rob Harrell
May 7, 2001

EnSafe appreciates the opportunity to assist the Navy with the transfer of property at the Charleston Naval Complex. If you have any questions regarding the survey, please feel free to call me at 884-0029.

Sincerely,
EnSafe Inc.



Steven J. Parker, CPG, CHMM
Project Manager

5090/11
18B1
31 March 2001

Mr. Keith Collinsworth, P.G.
Federal Facility Liaison
Environmental Quality Control Administration
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, SC, 29201

Subject: FINDING OF SUITABILITY TO LEASE, BUILDING 79/79A

Dear Mr. Collinsworth,

This letter forwards the Finding of Suitability to Lease (FOSL) and Environmental Baseline Survey for Lease (EBSL) for Building 79/79A at the Charleston Naval Complex. The document is forwarded for your review as required by Department of Defense policy. The Charleston Naval Complex Redevelopment Authority (CNCRA) has requested this FOSL in order to sublease the building for industrial use consistent with that previous with the exception that no radiological work will be permitted.

The Navy requests that the Department review and approve or comment on the FOSL/EBSL as appropriate. Comments will be incorporated and addressed that are received before 30 April, 2001. If you should have any additional questions concerning the Draft FOSL/EBSL please contact me at (843) 820-5525.

Sincerely

M.A.Hunt, P.E.
BRAC Environmental Coordinator
Charleston Naval Complex

Copy to:
SCDHEC (3)
EPA(Dann Spariosu)
CH2M Hill (Gary Foster)



2600 Bull Street
Columbia, SC 29201-1708

May 4, 2001

Matthew Humphrey
Caretaker Site Office
NAVFACENCOM, Southern Division
P. O. Box 190010
North Charleston, SC 29419-9010

Re: Interim Measures Work Plan (Lead contaminated soil removal) for AOC 518, Coal Storage Bins, located in Zone C of the Charleston Naval Complex, SCO 170 022 560, Revision 0, dated April 2001, received April 4, 2001. Additional information provided via e-mail dated May 3, 2001.

Dear Mr. Shepard:

The South Carolina Department of Health and Environmental Control (Department) has reviewed the above referenced document according to applicable State and Federal Regulations, and the Charleston Naval Complex Hazardous Waste Permit, effective September 17, 1998. The interim measures work plan as written (page 2-2) discusses the confirmatory sampling for subsurface soil from the floor of the excavation. The Navy plans to change the subsurface soil sampling strategy from the referenced work plan as follows (e-mail dated 5/3/01): "In addition to the perimeter surface soil sampling described in the work plan to confirm the target excavation area, we are also collecting subsurface soil samples at a depth of 1 to 2 ft below land surface at the same locations where the previous surface soil samples exceeded 400 mg/kg." This change in the sampling strategy was discussed and agreed upon by the BCT team and therefore, please reflect this change in the interim measures report. Based on this review the referenced interim measures work plan is approved. Any new information found to be contradictory may require further action.

Further, the Navy should provide the field implementation schedule to the Department for field visit and oversight.

Should you have any questions regarding this issue, please contact Mihir Mehta at (803) 896-4088 or Paul Bergstrand at (803) 896-4016.

Sincerely,

David Scaturo, PE, PG
Manager, Corrective Action Engineering Section
Division of Waste Management
Bureau of Land & Waste Management

Attachments: Memorandum from Susan Peterson to Mihir Mehta dated May 1, 2001.
Memorandum from Mansour Malik to Mihir Mehta dated May 3, 2001.

cc: Paul Bergstrand, Hydrogeology
Mansour Malik, Hydrogeology
Susan Peterson, Corrective Action Engineering
Rick Richter, Trident EQC
Tony Hunt, SOUTHDIV
Rob Harrell, SOUTHDIV
Dann Spariosu, EPA Region IV
Dean F. Williamson, CH2MHILL-JONES
Gary Foster, CH2MHILL-JONES



2600 Bull Street
Columbia, SC 29201-1708

MEMORANDUM

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TO: Mihir Mehta, Project Manager
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

FROM: *Susan Peterson*
Susan Peterson, Environmental Engineer Associate
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: May 1, 2001

RE: IM WP for Soil Removal, dated April 2001
AOC 518, Coal Storage Bins, Zone C

Charleston Naval Complex (CNC)
Charleston, South Carolina
SC 170 022 560

This IM WP describes the proposed technical approach to delineate the extent of the lead-impacted soil (i.e., those soils with lead in excess of 400 mg/kg) and its subsequent removal.

The Department recommends approval and subsequent implementation of this IM WP.

The Document referenced above has been reviewed with respect to the requirement of R.61-79 of the South Carolina Hazardous Waste Management Regulations, The Environmental Protection Agency's (EPA) RCRA Facility Assessment Guidance Document dated October 1988, and the revised EPA Region IV Environmental Compliance Branch Standard Operating Procedures and Quality Assurance Manual (SOP/QAM) dated May 1996, the CNAV Final Comprehensive Sampling and Analysis Plan dated 30 August 1994, CERCLA 120(h) as amended.

The Division of Hydrogeology recommends the approval of this document as written. For future public documents, geostatistical data and interpretation should be incorporated to support the physical site assessment and/or remediation. CH2Mhill should provide the Department with the field activity schedule.

5090/11
Code 18713
3 May 01

Mr. John Litton, P.E.
Director, Division of Hazardous and Infectious Waste Management
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, SC 29201

Subj: SUBMITTAL OF AREA OF CONCERN 709H INTERIM MEASURE WORK PLAN

Dear Mr. Litton,

The purpose of this letter is to submit an Interim Measure Work Plan, Revision 0, for Area of Concern (AOC) 709H located at the Charleston Naval Complex. The work plan is submitted to fulfill the requirements of condition IV.E.2 of the RCRA Part B permit issued to the Navy by the South Carolina Department of Health and Environmental Control and the U.S. Environmental Protection Agency (EPA).

The document is distributed under separate cover letter by CH2M Hill. Appropriate certification is provided under that correspondence. We request that the Department and the EPA review this document and provide comments or approval whichever is appropriate.

If you should have any questions, please contact, Matthew Humphrey or myself at (843) 743-9985 and (843) 820-5551 respectively.

Sincerely,

ROBERT A. HARRELL, JR., P.E.
Environmental Engineer
BRAC Division

Copy to:
SCDHEC (4)
USEPA (Dann Spariosu)
CSO Naval Base Charleston (Matt Humphrey)
CH2M-Hill (Dean Williamson)

Code 18 CIRC
18713
Daily

18713 
18E2HPH 



CH2MHILL

CH2M HILL
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Tel 352.335.7991
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May 1, 2001

John Litton, P.E., Director
Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: Interim Measure Work Plan for Delineation Sampling and Soil Removal
Grid Areas G7 and G38, Area of Concern (AOC) 709H, Zone H

Dear Mr. Litton:

Enclosed please find four copies of the Interim Measure Work Plan for Delineation Sampling and Soil Removal at Grid Areas G7 and G38 at AOC 709H in Zone H of the Charleston Naval Complex (CNC). This report has been prepared pursuant to agreements by the CNC BRAC Cleanup Team for completing the RCRA Corrective Action process.

Please contact me if you have any questions or comments.

Sincerely,

CH2M HILL

Dean Williamson, P.E.

cc: Tony Hunt/Navy, w/att
Rob Harrell/Navy, w/att
Mihir Mehta/SCDHEC
Gary Foster/CH2M HILL, w/att