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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL REVIEW OF ABOVE GROUND STORAGE TANK (AST)
CLOSURE REPORT DATED 15 MARCH 2000 FOR BUILDING NS-69 ABOVE GROUND
STORAGE TANK 601 (AST 601) CNC CHARLESTON SC

05/03/2000

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



3 May 2000

01537

2600 Bull Street
Columbia, SC 29201-1708

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P.O. Box 190010
North Charleston, SC 29419-9010

William M. Hull, Jr., MD
Vice Chairman

Attention: Mr. Gabriel Magwood

Mark B. Kent
Secretary

Re: Aboveground Storage Tank Closure Report dated 15 March 2000
Building NS 69/AST 601 (Site Identification # 15405-General File)
Charleston Naval Complex/Charleston Naval Base
Charleston, SC
Charleston County

Howard L. Brilliant, MD

Brian K. Smith

Rodney L. Grandy

Larry R. Chewning, Jr., DMD

Dear Mr. Magwood:

The author has completed technical review of the referenced document. As submitted, the report provides a narrative describing closure activities and analytical results of environmental sampling to determine if releases have occurred as a result of operation of the referenced vessel and/or associated piping system. The analytical results provided indicate reportable concentrations of BTEX and PAH compounds were detected in soil grab samples obtained from under the AST and piping connections. Although soil sample results for PAH compounds were reported as BDL (below detection limits) the detection limit for these samples were elevated due to matrix interference. As noted in previous correspondence (Bristol to Amey, 2 September 1997), when contaminant concentrations are reported as zero (0) or BDL it will be assumed that the chemical constituent is equal to the elevated detection limit. With this consideration, the reported concentrations approach or exceed the RBSL (Risk-Based Screening Levels, SCDHEC *Risk-Based Corrective Action for Petroleum Releases*, 5 January 1998), proposed RBC (Risk-Based Concentrations for Residential Soils, EPA Region III Risk-Based Concentrations Table, 7 October 1999) and/or as proposed in the SCAP (Soil Corrective Action Plan amended July 1997) for the Charleston Naval Complex and appear to indicate that additional endeavors for remedial actions and contaminant characterization are warranted at the referenced site. In this regard, assessment/corrective action activities proposed in the Tank Management Plan (dated October 1996) should be implemented in an appropriate and timely manner. Employed activities should be technically sufficient and reasonable to determine the extent and severity of suspected contamination. Please be reminded that groundwater sampling, if necessary, will require construction of sampling points and will need to be submitted for prior review and approval, as appropriate.

Charleston Naval Complex/Charleston Naval Base
3 May 2000
page 2

Sincerely,

Paul L. Bristol, Hydrogeologist
Groundwater Quality Section
Bureau of Water

cc: Trident District EQC