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TRANSMITTAL LETTER AND SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON THE DRAFT SAMPLING AND ANALYSIS
PLAN CONFIRMATORY SAMPLING WORK PLAN FOR AREA OF CONCERN 735 CNC
CHARLESTON SC
10/2/2015
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

October 2, 2015

Paul F. Burgio
BRAC Environmental Coordinator
NAVFACHQ, BRAC PMO
Building 679, Naval Business Center
4911 South Broad Street
Philadelphia, PA 19112-1303

RE: Review of Draft Sampling and Analysis Plan
Confirmatory Sampling Work Plan for AOC 735
Charleston Naval Complex (CNC)
SC0 170 022 560

Dear Mr. Burgio:

The Department of Defense Corrective Action Section of the South Carolina Department of Health and Environmental Control (Department) received the above referenced report on September 14, 2015. The Department reviewed the report with respect to the CNC RCRA Hazardous Waste Permit. Based on the review the Department provides the following comments.

If you have any questions regarding this issue, please contact me at (803) 898-0368.

Sincerely,

Meredith Amick, P.E., Environmental Engineer
DOD Corrective Action Section
Division of Waste Management
Bureau of Land and Waste Management

cc: Christine Sanford-Coker, EOC Region 7, Charleston (electronically)
Shawn Dolan, (AECOM) (electronically)
Dean Williamson, CH2M Hill (electronically)
Todd Bober, NAVFAC (electronically)

Review Comments
Meredith Amick
10/2/2015



1. The Department believes that the adjacent property (parking lot area) containing Land Use Controls owned by the Palmetto Railways has been transferred to NH68 LLC. Please clarify.
2. Soil and groundwater samples should be analyzed for VOCs, SVOCs, and metals. The document should be updated as appropriate.
3. Naphthalene detections in groundwater should be compared to both Tapwater RSLs as well as RBSLs. This comment is applicable to other constituents that do not have MCLs. The document should be updated accordingly.
4. Naphthalene detections in soil should be compared to Residential RSLs, Soil to Groundwater RSLs, and SCDHEC RBSLs. This comment is applicable to all constituents. The document should be updated accordingly.
5. Appropriate Zone backgrounds for soil and groundwater should be used for comparison instead of reference to coastal plain South Carolina. The document should be updated as appropriate.
6. All former buildings within the area should be identified on maps. (ie Automotive Storage buildings in the West Yard Loft area)