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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON THE TANK MANAGEMENT PLAN CNC
CHARLESTON SC
6/18/1996
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

June 18, 1996

Department of the Navy
Naval Facilities Engineering Command
Attention: Gabriel Magwood
P.O. Box 190010
2155 Eagle Drive
North Charleston, SC 29419-9010

RE: Charleston Naval Facilities
Tank Management Plan received March 20, 1996
USEPA correspondence received May 13, 1996
Charleston County

Dear Mr. Magwood:

The Ground Water Protection Division (GWPD) and the Bureau of Underground Storage Tank Management (BUSTM) of the South Carolina Department of Health and Environmental Control have reviewed the referenced Tank Management Plan (TMP) and offers the following comments:

- 1) The TMP has been reviewed by the USEPA's underground storage tank program. The referenced comments are enclosed and the GWPD concurs with the comments. The GWPD and the BUSTM have expanded on these comments and included additional remarks of their own.
- 2) The TMP does not include regulated chemical tanks as indicated in USEPA's comment #1. Chemical USTs are regulated by the BUSTM per the SC Underground Storage Tank Control Regulations, R.61-92, Part 280. These USTs must be properly abandoned and assessed as outlined in R.61-92. In addition, all chemical USTs in operation must have secondary containment structures by 1998 to be in compliance.

If at the time of abandonment and/or assessment, it is indicated that a release to the environment from the chemical USTs may have occurred, additional investigation of that release would be transferred to the RCRA program.

- 3) As outlined in USEPA's comment #2, the GWPD utilizes specific chemical values to determine site conditions. These values can be determined site specifically utilizing the leachability calculations outlined in the Risk Based Corrective Action for Petroleum Releases dated June 1995 (RBCA) or by using the risk based

remember to properly notify the appropriate BUSTM personnel prior to the removal of regulated USTs.

If you have any questions, please call me at (803) 734-5328. On all future correspondences concerning petroleum releases, be sure to reference the appropriate UST permit number Site ID number.

Sincerely,



Timothy A. Mettlen, Hydrogeologist
Assessment and Development Section
Ground Water Protection Division
Bureau Drinking Water Protection

ENC: USEPA Correspondence received May 13, 1996

CC: Paul Bergstrand, BSHWM
Doyle Brittain, USEPA Region IV, 345 Courtland Street NE, Atlanta, GA 30365
Robert Hutchinson, Manager, SC UST Regulatory Section, BUSTM