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LETTER TRANSMITTING CONDITIONS NEED TO BE MET IN ORDER FOR SOUTH  
CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL TO APPROVAL  
FINAL RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION  
REPORT DATED 7 AUGUST 1998 CNC CHARLESTON SC  
1/29/1999  
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2901-12-240

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January 29, 1999

Henry Shepard II, P.E.  
Caretaker Site Office  
NAVFACENGCOCM, Southern Division  
1690 Turnbull Avenue  
Building NH-51  
Charleston, SC 29405

Re: Zone A Response to Comments and  
Final RCRA Facility Investigation (RFI) Report  
Dated August 7, 1998  
Charleston Naval Complex  
-- SC0 170 022 560

Dear Mr. Shepard:

The South Carolina Department of Health and Environmental Control (Department) has received and reviewed the above referenced Response to Comments and Final RFI Report. The review was performed according to applicable State and Federal Regulations and the Charleston Naval Complex Hazardous Waste Permit effective September 17, 1998. The report presented recommendations on the next step in the corrective action process at units in Zone A. The Department after this review and according to permit condition II.E.8. believes that the units at Zone A should be classified as follows:

SWMU 1	CMS (to be addressed as part of SWMU 2)
SWMU 2	CMS (with conditions)
SWMU 38	CMS (with conditions)
SWMU 39	CMS (with conditions)
SWMU 42/AOC 505	CMS (with conditions)
SWMU 43	Pending (with conditions)
AOC 506	CMS (limited removal)
Ecological subzone A1	No further evaluation required.

Based on this review and contingent that the attached conditions are met the Department approves the Zone A final RFI report.

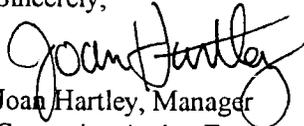
It should be noted that the permit shall be modified pursuant to R.61-79.270.41. The US EPA has not provided written comments or an approval letter to date.

The Department's concurrence is based on the information provided by the Navy to date. Any new information contradicting the basis for this concurrence may require further investigation or action.

H. Shepard  
January 29, 1999  
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Should you have any questions regarding this issue, please contact Johnny Tapia at (803) 896-4179 or Paul Bergstrand at (803) 896-4016.

Sincerely,

A handwritten signature in black ink, appearing to read "Joan Hartley". The signature is fluid and cursive, with the first name "Joan" being more prominent than the last name "Hartley".

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

cc: Paul Bergstrand, Hydrogeology  
Rick Richter, Trident EQC  
David Dodds, SOUTHNAVFACENGNCOM  
Dann Spariosu, EPA Region IV  
- Todd Haverkost, ENSAFE

## CONDITIONS FOR THE APPROVAL OF THE ZONE A RFI REPORT

( dated August 7, 1998)

The following conditions for each unit should be met and/or clarified during the preparation and implementation of the Corrective Measures Study Work Plan or Report, as applicable. These conditions are necessary to either complete the RFI phase or develop the CMS:

- SWMU 1:
  - Risk calculations for soil did not include Antimony and Copper. Both exceeded reference concentration values. Both constituents should be accounted for during the CMS.
  - Shallow groundwater detections of manganese were compared to deep groundwater reference concentrations. Manganese exceedances were identified in all rounds of sampling. The CMS should account for these detections.
  
- SWMU 2:
  - The approved RFI work plan for SWMU 2 proposed that 10% of the samples collected shall be duplicate samples analyzed for the Appendix IX list of constituents including dioxins. The report shows that only one duplicate sample was collected. The completion of the 10% collection of samples for Appendix IX constituents shall be proposed and completed in the CMS phase.
  - Copper was not included in the risk assessment for soil even though it was designated as a COPC. This constituent's detection shall be accounted for in the Corrective Measures Study.
  - Minimal concerns at Ecological subzone A-1 should be addressed under the SWMU 2 CMS.
  
- SWMU 38:
  - Fate and Transport concerns were identified for DDD, DDT, Antimony, Arsenic and Selenium. The CMS work plan should address these concerns.
  
- SWMU 39:
  - The calculation of groundwater Exposure Point Concentrations needs to be revised to ensure that the data used on individual plumes and their averages are accurate. This unit is designated for a CMS, therefore the revision or confirmation of these EPC values shall be done in this phase.
  
- SWMU 42/ AOC 505:
  - Fate and Transport concerns were identified for BEQs, Antimony, Arsenic and Thallium. The CMS work plan should address these concerns.
  - Well 505-GW-001 should be sampled for PCBs as part of the CMS.
  
- SWMU 43:
  - The text of the report acknowledges a potential impact from this unit to Noisette creek. The RFI investigation of Noisette creek, in relation to SWMU 43, was deferred to the Zone J RFI investigation. The Department believes that while there is a potential impact or concerns that has not been assessed, the unit can not be released from requirements under RCRA subtitle C. Once the

Zone J RFI investigation clarifies if Noisette creek has or has not been affected by SWMU 43, the status of this unit will be re-evaluated.

- AOC 506:
  - This unit was recommended for a CMS based on Fate and Transport concerns as BEQ levels detected in the subsoil exceeded Soil Screening Levels. A localized removal is recommended.
  
- GRID-BASED SAMPLES:
  - Two constituents, BEQs and Arsenic exceeded reference concentrations in roughly the same areas of zone A. A localized action is recommended to eliminate these high detections for these two constituents.