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STATEMENT OF BASIS FOR AREA OF CONCERN 517 ZONE C CNC CHARLESTON SC
9/25/2013
RESOLUTION CONSULTANTS

STATEMENT OF BASIS

Charleston Naval Complex Installation Restoration Program Charleston, South Carolina

Facility: Charleston Naval Complex
Unit Type: AOC 517 (Zone C)
Contaminants: None
Media: Surface Water, Sediments
Proposed Remedy: Land Use Controls (LUCs)

INTRODUCTION

The purpose of this Statement of Basis (SB) is to present the decision for Area of Concern (AOC) 517, which is Land Use Controls (LUCs), and to invite public comment on this proposed decision. This SB provides AOC 517 background information and explains the reasons why LUCs are proposed. See Figure 1 for a facility location map.

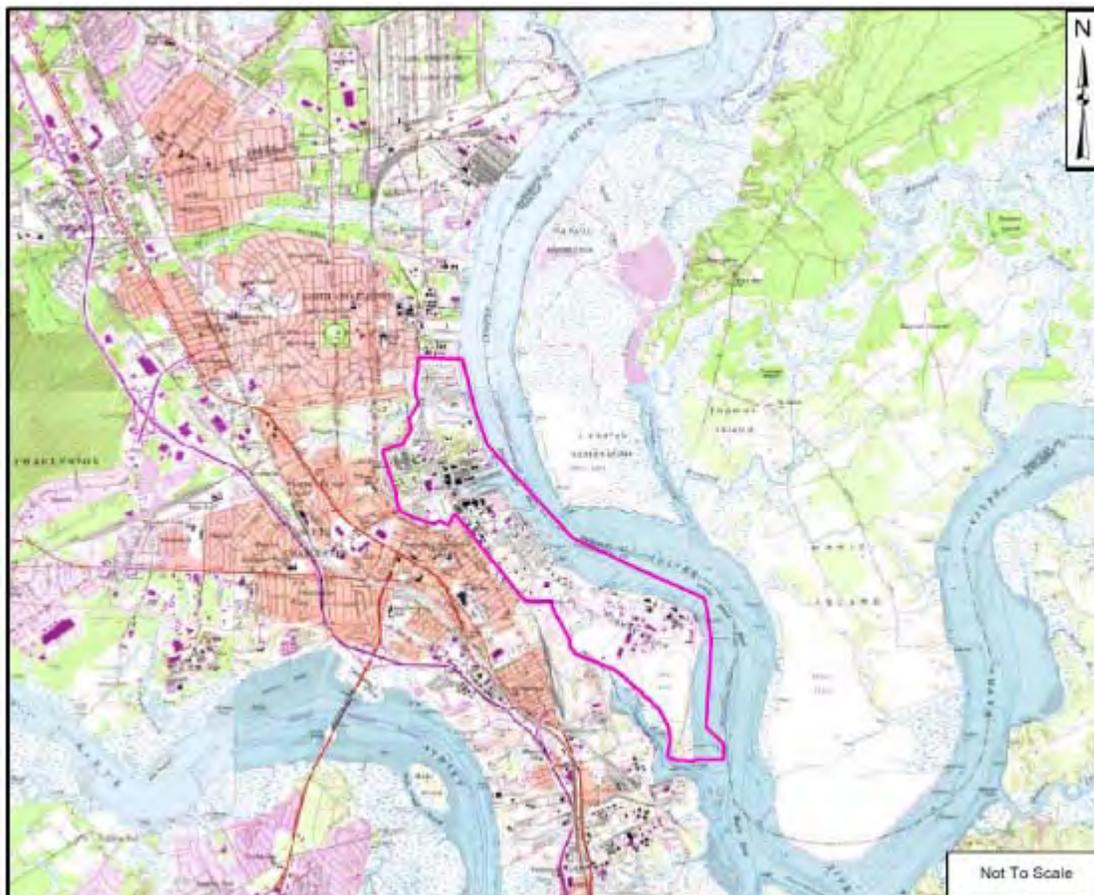


Figure 1 – Charleston Naval Complex, Charleston, South Carolina

Charleston Naval Complex (CNC) is located on the western bank of the Cooper River in Charleston Harbor at the confluence of the Ashley, Cooper, and Wando Rivers and their

tributaries. CNC consists of 12 investigative zones (Zones A through L) for Resource Conservation and Recovery Act (RCRA) corrective action processes.

This SB presents the proposed remedy that LUCs are required for AOC 517, located within Zone C. A site location map for AOC 517 is provided as Figure 2.

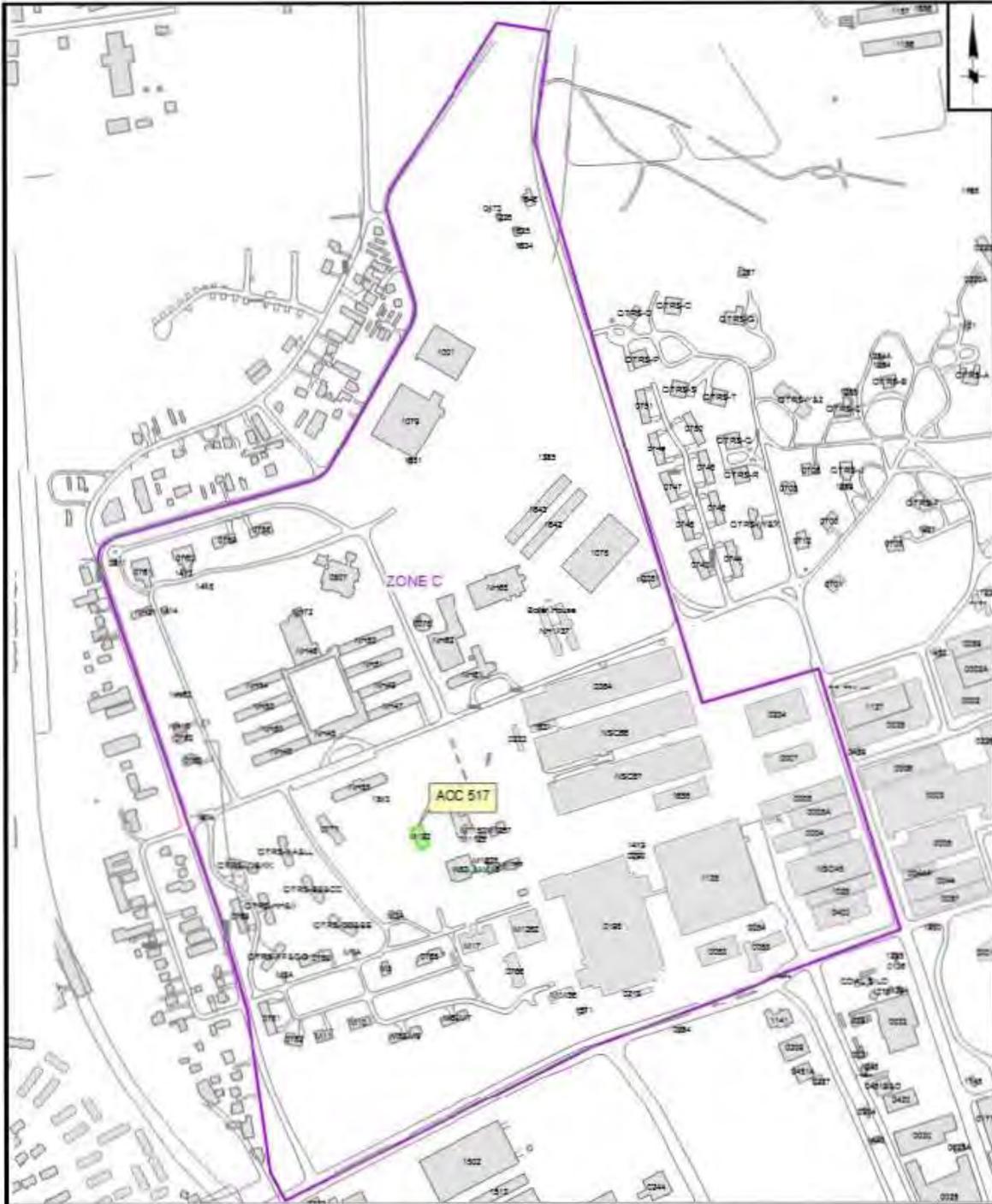


Figure 2 – AOC 517 Site Location Map

The CNC and South Carolina Department of Health and Environmental Control (SCDHEC) jointly developed the specific site remedy described herein and are issuing this SB as part of their public participation responsibilities under Section 7004(b) of the RCRA Title 42, United States Code Section 6974(b), and applicable state law. This document is intended to inform the general public of the proposed remedy for this site. SCDHEC will not approve the proposed remedy until the 45-day public comment period has ended and all information submitted during the public comment period has been reviewed and considered. SCDHEC may modify the proposed corrective action or select another action based on new information or public comments received on this proposal. Therefore, the public is invited to review and comment on all alternatives, including any potential corrective measures that were not previously considered.

The information summarized in this SB can be found in greater detail in documents contained in the Information Repository for this facility. This SB does not replace those documents. Historical documents can be found in the administrative record at Base Realignment and Closure Program Management Office (BRAC PMO) located in North Charleston, SC and the SCDHEC office located in Columbia, South Carolina (addresses provided at the conclusion of this document). SCDHEC encourages the public to review these documents in order to gain a more thorough understanding of the site and the activities that have been conducted.

PROPOSED REMEDIES

The recommended alternative for AOC 517 is LUCs. This remedy was selected by SCDHEC in their June 11, 2013 approval letter regarding the *Corrective Measures Study WP for AOCs 517 and 523* addressed to Mr. David Criswell, P.E. of the BRAC PMO. Because the remedy of LUCs has already been selected and approved by SCDHEC, there is no further discussion included herein concerning other potential corrective measures alternatives or the terms of the decision criteria resulting in the selection of the proposed remedy. As a result, there is no “Summary of Alternatives” section or “Evaluation of Alternatives” section included in this SB.

SITE BACKGROUND

AOC 517 consists of the area around and including Building M-192, a former indoor firing range that was operated by the Navy between 1959 and 1974. The building was subsequently converted into a classroom and storage building in 1974. The building was identified as an AOC because of the potential for lead dust release to the environment from firing range activities. In 1997, wipe samples collected from the wall, floor, and ceiling surfaces inside the building confirmed the presence of lead.

In May 1998, the Supervisor of Shipbuilding Conversion and Repair, USN, Portsmouth Va., Environmental Detachment Charleston (SPORTENVDETHASN) conducted a lead dust survey and lead abatement action at Building M-192 (Department of Navy, February 1999). Following remediation of the inside surfaces of the building in 1999; wipe samples indicated that residual lead dust was no longer detected inside the building. The SPORTENVDETHASN recommended that the painted surfaces inside Building M-192 be maintained to ensure the encapsulation of lead dust. The Navy subsequently recommended LUCs for this site. LUCs were approved by SCDHEC in their June 11, 2013 approval letter.

The current property owner, South Carolina Public Railroad Commission, is responsible for maintaining LUCs. The LUCs include encapsulation of lead dust, legal obligations that restrict the land’s use and allowable activities, and annual inspections of the property. These inspections are conducted annually and the results are reported to SCDHEC. These LUCs are recommended for implementation to prevent adverse human health or environmental impacts associated with potential exposure to COCs at the site.

PREVIOUS INVESTIGATIONS

The RCRA Facility Investigation (RFI) for Zone C (which includes AOC 517) was completed by Ensafe/Allen & Hoshall in November 1997. According to the RFI Report, 10 soil samples were collected around the exterior of the building and analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, cyanide, and pesticides/polychlorinated biphenyls (PCBs). No contaminants of concern (COCs) were identified as a result. Wipe samples collected inside the building confirmed the presence of lead on wall, floor, and ceiling surfaces. The RFI Report recommended addressing the lead dust as an industrial hygiene matter, depending on the intended reuse of the building (Tetra Tech 2013).

A remediation effort of lead dust was performed on the interior of Building M-192 in January 1999. Following remediation of the inside surfaces of the building; it was found that the remediation had addressed the residual lead dust reducing its levels to less than 25 µg/ft², which is the method detection limit (Tetra Tech 2008). The SPORTENVDETHASN completed corrective action for the COCs consistent with the appropriate Department of Housing and Urban Development (HUD) regulations and guidance for exposure to lead dust from lead-based paint. Beyond implementing a corrective action to encapsulate lead dust, there have been five surface soil samples collected at AOC 517 which were all clean, particularly with respect to lead (Tetra Tech 2013).

SCDHEC's approval letter for the RFI classified AOC 517 as requiring a CMS, indicating that lead dust removal was necessary as there are no regulations governing lead dust exposure and most of Zone C is planned to have a residential reuse.

SUMMARY OF SITE RISKS

The primary risk at AOC 517 was attributable to the inside of the building, though this has since been remediated. Corrective Actions taken by the Navy in the interior of the building have addressed lead dust residual on the floors, walls, and ceilings. The source of the lead dust, either through the indoor range activities or the wastewater, has been removed. The existing lead dust levels in Building M-192, AOC 517 are below the HUD Lead Hazard Screening Level. Encapsulation is in place and the interior surfaces are within lead loading standards. Maintenance will be required at the painted surface to ensure the continued encapsulation of lead dust. No further restrictions are necessary for use of the building. Five soil borings were collected in the area surrounding Building M-192 and no constituents of potential concern (COPC) were identified (i.e., concentrations were less than risk-based screening concentrations).

SCOPE OF CORRECTIVE ACTION

LUCs only are reasonable, appropriate and technically warranted for AOC 517.

ANTICIPATED IMPACTS OF CLEANUP ON THE LOCAL COMMUNITY

No significant impacts or exposure to the local community are anticipated with the proposed LUCs at AOC 503.

STATUTORY AUTHORITIES

This document is being issued in accordance with 40 Code of Federal Regulations (CFR), in compliance with federal hazardous waste management requirements. The Charleston Naval Complex Corrective Action Program is conducted under the authority of Sections 3004(u), 3004(v), 3005(c)(3), 3008(h), 3013, 6001, and 7003 of the RCRA (42 U.S.C. 6901 et. seq.) as amended by the Hazardous & Solid Waste Amendment of 1984 (HSWA) (Pub. L. No. 98-616,

98 Stat. 3221) and the Federal Facility Compliance Act of 1992 (FFCA) (Pub. L. 102-386, 106 Stat. 1505). This SB is part of the corrective action process and is a requirement of Hazardous Waste Permit No. SC0 170 022 560, issued to Charleston Naval Complex by SCDHEC.

PUBLIC PARTICIPATION

The final remedy selected for the site will be based on community acceptance. Public participation and comments are vital to a thorough evaluation. Documents generated following site investigation and remediation activities are available for public review.

A 45-day public comment period will be held (dates to be determined) during which time written comments will be accepted from the public. A public hearing will be held at public request. If a hearing has been requested, information regarding the date, time, and location will be published in the *Post & Courier* newspaper.

Contact information is listed below for submission of comments regarding this Statement of Basis, request for public hearing, and/or for review of available documentation.

Mr. David Criswell, P.E.
Restoration Program Manager
Navy BRAC Program Management Office SE
4130 Faber Place Drive Suite 202
North Charleston, SC 29405
(843) 743-2130
Between the hours of 8:30 AM and 4:30 PM

or

Ms. Meredith Amick, P.E.
Bureau of Land and Waste Management
Division of Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, SC 29201
(803) 898-0368
Between the hours of 8:30 AM and 4:30 PM

REFERENCES

- SCDHEC, 2013. Approval of Corrective Measures Study WP for AOCs 517 and 523.
- Department of Navy, 1999. Process Closure for AOC 517 - Completion Report, Naval Base Charleston SC (24 Feb 1999)
- TetraTech, 2013. *CMS Work Plan for Zone C, AOC 517 and AOC 523.*
- TetraTech, 2008. *Zone C, AOC 517 and AOC 523, NFA Status Investigation Memo.*