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STATEMENT OF BASIS FOR AREA OF CONCERN 734 FORMER BUILDING 1279 CNC
CHARLESTON SC
9/30/2013
RESOLUTION CONSULTANTS

STATEMENT OF BASIS

Charleston Naval Complex Installation Restoration Program Charleston, South Carolina

Facility: Charleston Naval Complex
Unit Type: AOC 734 (Former Building 1279)
Contaminants: None
Media: Groundwater
Proposed Remedy: No Further Action (NFA)

INTRODUCTION

The purpose of this Statement of Basis (SB) is to present the decision for Area of Concern (AOC) 734 (Former Building 1279), which is No Further Action (NFA), and to invite public comment on this proposed decision. This SB provides AOC 734 background information and explains the reasons why NFA is proposed. See Figure 1 for a facility location map.

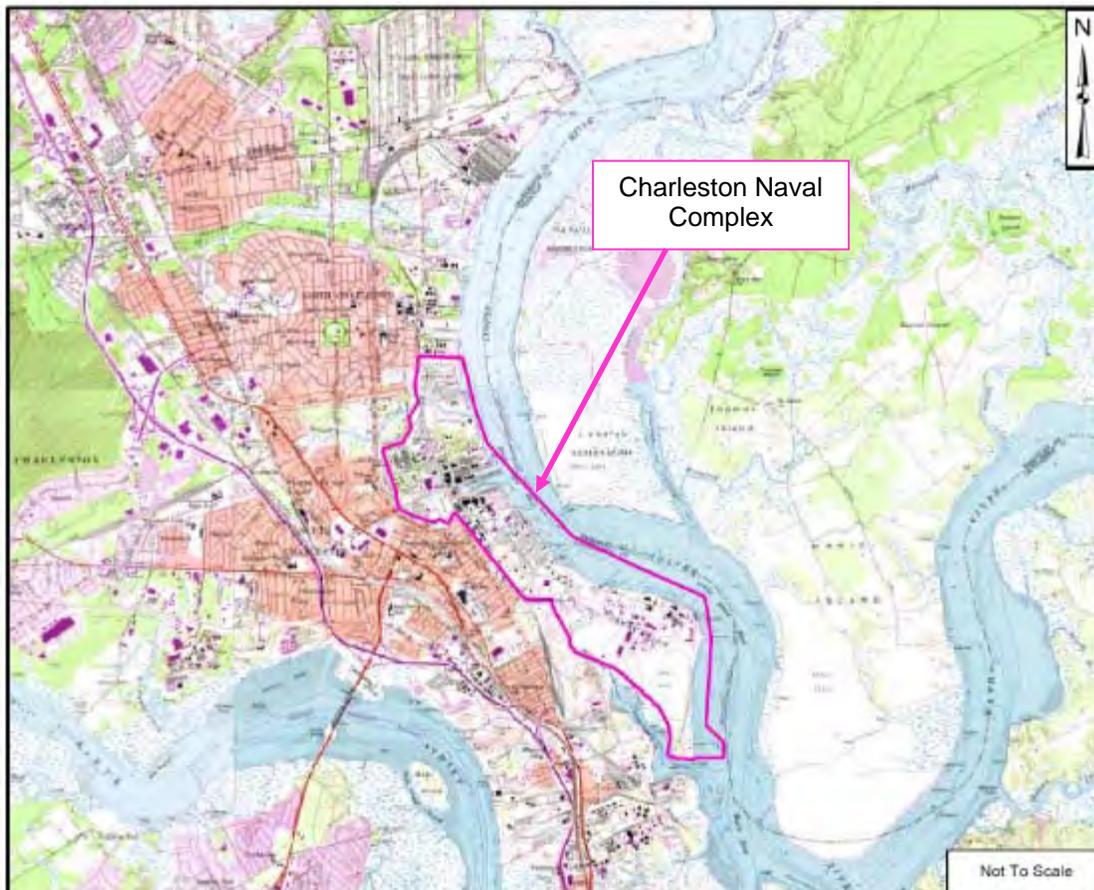


Figure 1 - Charleston Naval Complex, South Carolina

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. AOC 734 (Building 1279) is located on Hobson Boulevard, CNC, in Charleston, South Carolina.



Figure 2 – AOC 734 Location, Charleston Naval Complex, South Carolina

This SB presents the proposed remedy that NFA is required for AOC 734. A site location map for AOC 734 is provided as Figure 2. See Figure 3 for a detailed site map of AOC 734.

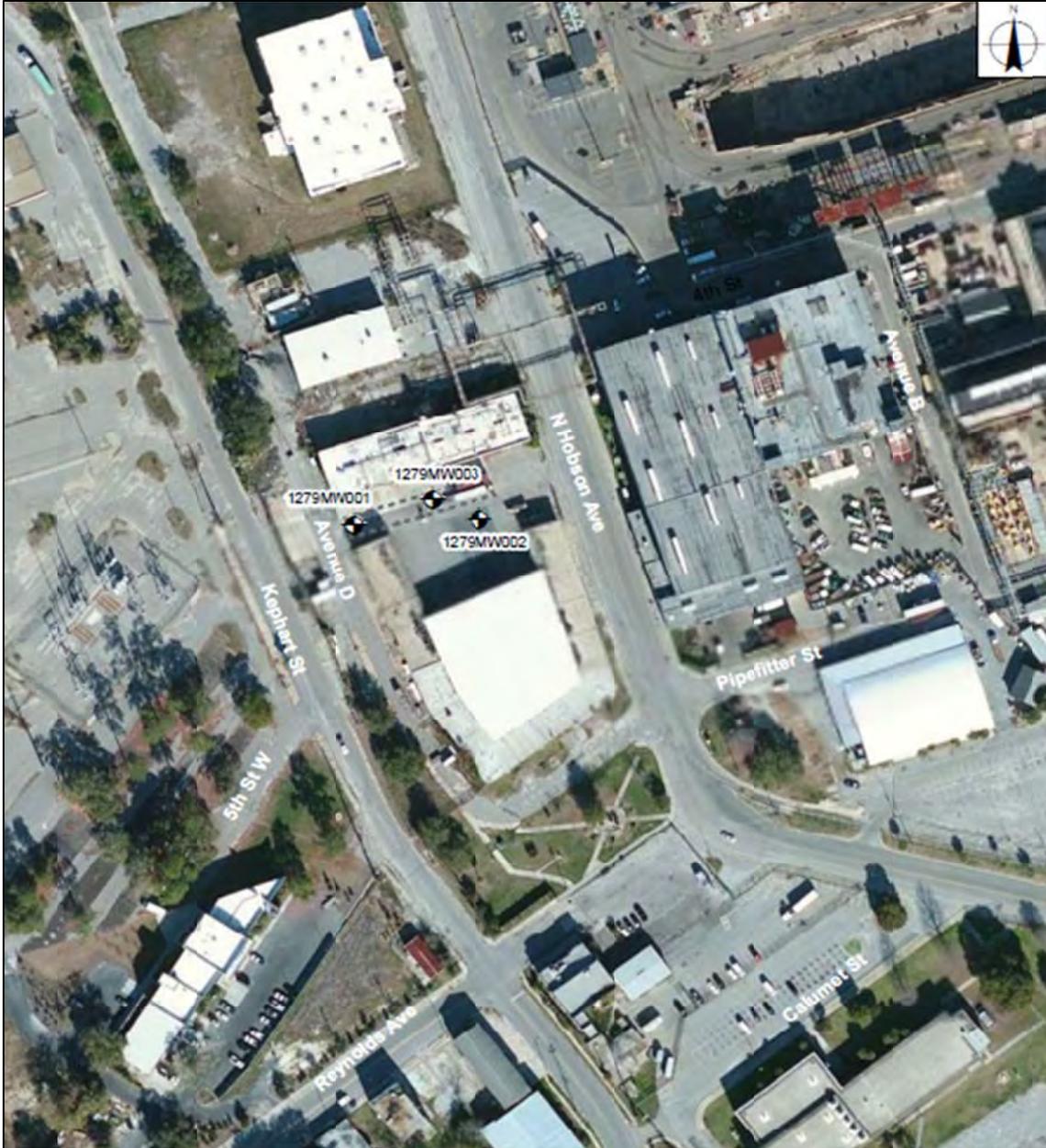


Figure 3 – AOC 734, Charleston Naval Complex, South Carolina

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 and follows the United States Environmental Protection Agency (USEPA) Office of Solid Waste and Emergency Response (OSWER) Directive 9902.6. SCDHEC will not approve the proposed remedy until the 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 SB. 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 the Base Realignment and Closure Program Management Office (BRAC PMO) office 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 734 is NFA. This remedy was selected by SCDHEC in their September 10, 2013 approval letter regarding the Groundwater Monitoring Reports for Building 1279 (Resolution Consultants, February 2013 and August 2013), addressed to the BRAC PMO. Because the remedy of NFA 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 734, the former Building 1279, is located Hobson Boulevard, CNC, Charleston, South Carolina. The building was previously used by CNC as a materials storage facility. Currently, the former Building 1279 area is owned by the City of North Charleston and leased to the Neal Brothers Company, who uses it for bulk storage. The former Building 1279 is bordered to the north by Building 30; to the east by North Hobson Street and Detyens Shipyards, Inc.; to the south by Pipefitter Street; and to the west by Kephart Street.

PREVIOUS INVESTIGATIONS

ADVENT Environmental, Inc. (ADVENT) was contracted to conduct a Tier I Assessment of AOC 734. Although there were no documented spills or leaks at this site, it was suspected that the cause of release was leaks in nearby tanks. In November 2004, ADVENT installed and sampled three groundwater monitoring wells (1279MW01, 1279MW002, and 1279MW003) at AOC 734. This investigation detected benzene and naphthalene at concentrations exceeding their respective SCDHEC Risk Based Screening Levels (RBSLs). The history of groundwater sampling events summarized herein was provided by Tetra Tech NUS, Inc. (Tetra Tech) in a letter describing the long-term monitoring (LTM) program addressed to Ms. Susan Fulmer of SCDHEC dated July 9, 2012.

Based on the information provided in Tetra Tech's July 9, 2012 letter, periodic groundwater sample collection for analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX) and naphthalene has been conducted at AOC 734 as part of an ongoing Monitored Natural Attenuation (MNA) Program since November 2005. During the November 2005 sampling event, concentrations of benzene and naphthalene were detected in the sample collected from monitoring well 1279MW003 at concentrations exceeding their respective RBSLs. Groundwater monitoring was not conducted at the site until August 2008.

Semi-annual groundwater sampling was conducted at the site from August 2008 through February 2010. The results of the February 2009 and August 2009 sampling events indicated that all constituent concentrations were below their respective RBSLs. However, during the February 2010 sampling event, benzene and ethylbenzene were detected in the sample collected from well 1279MW003 with benzene being reported at a concentration exceeding its RBSL.

The groundwater monitoring program for the site was reduced to one well (1279MW003) after the February 2010 sampling event and semi-annual monitoring continued at 1279MW003 from August 2011 through May 2013. During this time, Benzene and naphthalene were detected in the sample collected from well 1279MW003 during both August 2011 and February 2012 events; however, only the detection of naphthalene during the February 2012 sampling event was reported at a concentration exceeding its RBSL.

In a letter dated July 30, 2012, SCDHEC requested that, in accordance with Master Underground Storage Tank (UST) Quality Assurance Program Plan (QAPP) dated June 2011, the Navy prepare a site specific UST QAPP Addendum (Appendix B to the Master UST QAPP) for the AOC 734. Resolution Consultants prepared and submitted the site specific UST QAPP Addendum to SCDHEC in September 2012. In a letter dated October 25, 2012, SCDHEC approved the site specific UST QAPP Addendum and directed that groundwater sampling activities at well 1279MW003 resume at the site. Semi-annual groundwater sampling resumed at AOC 734 in December 2012. Benzene and naphthalene were not reported at concentrations which exceeded their respective RBSLs during this sampling event. In a letter dated February 21, 2013, SCDHEC agreed that a second sampling event should be conducted to confirm that concentrations remain below RBSLs in order for a No Further Action status to be issued for the release. During the May 2013 sampling event, benzene and naphthalene were not detected at or above their respective RBSLs. Because concentrations for benzene and naphthalene were below their respective RBSLs for two consecutive events, SCDHEC required NFA for this site.

SITE RISKS

As concentrations of chemicals of concern are below the established risk based screening levels, the reported release does not present a significant threat to human health or the environment.

SCOPE OF CORRECTIVE ACTION

NFA is appropriate and recommended for AOC 734.

CONTINGENCY REMEDIES

Contingency remedies are not necessary for NFA at AOC 734.

ANTICIPATED IMPACTS OF CLEANUP ON THE LOCAL COMMUNITY

No significant impacts to the local community are associated with the proposed NFA at AOC 734.

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 the Hazardous Waste Permit issued to Charleston Naval Complex by SCDHEC.

PUBLIC PARTICIPATION

The alternative 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 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, 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

- ADVENT Environmental, Inc., Building 1279 Tier I Assessment, Charleston Naval Complex, South Carolina, January 2005.
- Resolution Consultants, Draft Final Groundwater Monitoring Report, Building 1279, UST Permit #15368, Long Term Monitoring, Charleston Naval Complex, Charleston, SC, August 2013.
- Resolution Consultants, Draft Final Groundwater Monitoring Report, Building 1279, UST Permit #15368, Long Term Monitoring, Charleston Naval Complex, Charleston, SC, February 2013.
- Resolution Consultants, Draft Final UST QAPP Addendum, Building 1279, SCDHEC UST Permit #15368, Charleston Naval Complex, South Carolina, September 2012.
- SCDHEC, Quality Assurance Program for the Underground Storage Tank Management Division, June 2011.
- SCDHEC, Letter to BRAC PMO. Monitoring Report Review & QAPP Directive, Building 1279, Charleston Naval Base, Charleston, South Carolina, UST Permit #15368, July 30, 2012.
- SCDHEC, Letter to BRAC PMO. No Further Action, Building 1279, Charleston Naval Base, Charleston, South Carolina, UST Permit #15368, September 10, 2013.
- SCDHEC, Letter to BRAC PMO. Groundwater Monitoring Report Review, Building 1279, Charleston Naval Complex, Charleston, South Carolina, UST Permit #15368, February 21, 2013.
- SCDHEC, Letter to BRAC PMO. QAPP Approval/ Groundwater Sampling Directive, Building 1279, Charleston Naval Complex, Charleston, South Carolina, UST Permit #15368, October 25, 2012. Tetra Tech NUS, Inc., Building 1279 – Long-Term Monitoring Letter Report, July 2012.