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CNC CHARLESTON
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MISCELLANEOUS CORRESPONDENCE REGARDING RESOURCE CONSERVATION AND
RECOVERY ACT FACILITY INVESTIGATION CNC CHARLESTON SC
8/1/2001
CNC CHARLESTON

Correspondence
CNC

Ans 01



CH2MHILL

CH2M HILL

3011 S.W. Williston Road

Gainesville, FL

32608-3928

Mailing address:

P.O. Box 147009

Gainesville, FL

32614-7009

Tel 352.335.7991

Fax 352.335.2959

August 28, 2001

Mr. David Scaturo
Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: RFI Report Addendum (Revision 1) – AOC 619/SWMU 4, Zone F

Dear Mr. Scaturo:

Enclosed please find four sets of replacement pages which serve as Revision 1 of the RFI Report Addendum for AOC 619/SWMU 4 in Zone F of the Charleston Naval Complex (CNC). Below is a summary of the material enclosed with this letter:

- Revision pages 1-1 and 4-1, to be replaced in the Revision 0 RFI Report Addendum for AOC 619/SWMU 4, Zone F, submitted by CH2M-Jones in June 2001.
- CH2M-Jones responses to comments concerning the Revision 0 RFI Report Addendum for AOC 619/SWMU 4, Zone F, submitted by CH2M-Jones in June 2001, and dated August 17, 2001.

Revision pages 1-1 and 4-1 have been amended to address the comments provided to CH2M-Jones concerning the Revision 0 RFI Report Addendum for AOC 619/SWMU 4, Zone F. This report has been prepared pursuant to agreements by the CNC BRAC Cleanup Team for completing the RCRA Corrective Action process.

The principal author of this document is Louise Palmer. Please contact her at 704/329-0072 if you have any questions or comments.

Sincerely,

CH2M HILL

Dean Williamson, P.E.

cc: Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att



CH2MHILL

CH2M HILL
3011 S.W. Williston Road
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The principal author of this document is Louise Palmer. Please contact her at 704/329-0072 if you have any questions or comments.

Sincerely,

CH2M HILL

Dean Williamson, P.E.

cc: Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att



CH2MHILL

CH2M HILL

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August 28, 2001

Mr. David Scaturo
Division of Hazardous and Infectious Wastes
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- CH2M-Jones responses to comments concerning the Revision 0 RFI Report Addendum for AOC 619/SWMU 4, Zone F, submitted by CH2M-Jones in June 2001, and dated August 17, 2001.

Revision pages 1-1 and 4-1 have been amended to address the comments provided to CH2M-Jones concerning the Revision 0 RFI Report Addendum for AOC 619/SWMU 4, Zone F. This report has been prepared pursuant to agreements by the CNC BRAC Cleanup Team for completing the RCRA Corrective Action process.

The principal author of this document is Louise Palmer. Please contact her at 704/329-0072 if you have any questions or comments.

Sincerely,

CH2M HILL

Dean Williamson, P.E.

cc: Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att

To: Mr. David Scaturo
Division of Hazardous and Infectious
Wastes
South Carolina Department of Health
and Environmental Control

From: Vijaya Mylavarapu
(352) 335-7991

Date: August 14, 2001

Re: Technical Memorandum: *Results from Additional Background Sampling of the CNC Railroad Lines and Naval Annex (Zone K)*

Quantity	Description
4	Four (4) copies of the Technical Memorandum: <i>Results from Additional Background Sampling of the CNC Railroad Lines and Naval Annex (Zone K)</i>

The attached forty (40) pages of material, Technical Memorandum: Results from Additional Background Sampling of the CNC Railroad Lines and Naval Annex (Zone K), are to be appended to the PAHs Background Study Report, *Technical Information for Development of Background BEQ Values* (CH2M-Jones, February 2001). Please insert this material, which has been 3-hole drilled for your convenience, into the abovementioned report.

If material received is not as listed, please notify us at once.

Remarks:

Copy To:

Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att



CH2M HILL
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Gainesville, FL
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32614-7009
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August 31, 2001

*Proud Sponsor of
National Engineers Week 2000*

Mr. David Scaturo
Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: Zone E – Previously Uninvestigated RFI Units AOC 702 and AOC 703

Dear Mr. Scaturo:

This letter presents CH2M-Jones' proposal to address two AOCs in Zone E that have not yet been investigated. Both of these units, AOC 702 – Pier D Paint Accumulation Area, and AOC 703 – Pier F Paint Accumulation Area (see Figure 1), consist of surficial paint stains on concrete piers. Both units were listed because of the surficial staining that occurred in association with ship maintenance activities conducted at the piers.

A visual inspection of these two units was conducted on July 11, 2001 by CH2M-Jones personnel while preparing for the development of an RFI Workplan addendum. During the visit, it was found that both sites had minor incidental paint spills, which appeared to be old surficial oversprays and minor spills that occurred intermittently along the length of the piers (see Photos 1 and 2). They are essentially indistinguishable from old paint associated with official markings on the piers.

It was discovered that Piers D and F are both constructed of concrete and wood that extends out over the Cooper River (see Photos 3, 4, and 5) and that no environmental media exist between the piers and the Cooper River. The only environmental media that may have been affected are the sediments and surface water of the Cooper River, which are associated with Zone J.

The RFA recommended a Confirmatory Sampling Investigation (CSI) for both sites to characterize the areas of spilled paint, and that any potential impacts to the Cooper River be addressed as part of the Zone J investigation (EnSafe, 1995).

Because there are no soil or groundwater media at these sites to be evaluated, CH2M-Jones recommends that no field investigations or other actions are necessary for AOC 702. As a result, no addendum to the *Zone E RFI Report, Revision 0* (EnSafe, 1997) would be necessary to address either of these units.

The principal author of this document is Kris Garcia. Please contact her at 770/604-9182, extension 476, if you have any questions or comments.

Sincerely,

CH2M HILL

A handwritten signature in cursive script that reads "Dean Williamson".

Dean Williamson, P.E.

cc: Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att
General Distribution



UNITED STATES DEPARTMENT OF EDUCATION

WASHINGTON, D.C. 20202- _____

August 31, 2001

Mr. E. R. Nelson, Jr.
Director, Real Estate Division
Department of the Navy
Southern Division
Naval Facilities Engineering Command
P. O. Box 190010
2155 Eagle Drive
North Charleston, SC 29419-9010

Dear Mr. Nelson:

I am writing to inform you that the United States Department of Education must regrettably return your February 27, 2001 assignment of the former Chicora Tank Farm property to the United States Navy.

As you are aware, the Navy's assignment included groundwater use restrictions that the United States Department of Education and our proposed grantee, the Charleston County School District, was not made aware of until after assignment of the property. On April 30, 2001 we wrote to the school district to advise their representatives of the groundwater use restrictions. Subsequent to our April letter I met with officials of the school district in South Carolina regarding conveyance of the property. In follow up to my visit and our letter, we sent an additional letter to the school district on June 27, 2001 advising that they must inform the United States Department of Education, in writing, on or before August 27, 2001, if they still intend to acquire the property and accept the groundwater use restrictions covenant.

As you may know, the Charleston County School District intends to utilize the property as athletic fields and the groundwater use restrictions affect their ability to irrigate and maintain the fields. The Charleston County School District representatives were of the opinion that the groundwater use restrictions were unnecessary and verbally indicated to me that they would be meeting with Navy officials and requesting that the proposed groundwater use covenant be modified so as to not prohibit use of groundwater for irrigation purposes.

Unfortunately we have not heard from the Charleston County School District since our on-site meeting and letter of June 27th. The United States Department of Education has a legal obligation under Federal law to transfer title as soon as possible or the Department may be required to assume protection and maintenance costs for an indeterminate length of time until conveyance and may place us in violation of the Anti-Deficiency statutes. We, therefore, regrettably must return to the United States Navy all right, title and interest assigned to the United States Department of Education in your letter of February 27, 2001.

Page 2 – Mr. E. R. Nelson Jr.

Please contact me at (617) 223-9321 or Mary Hughes at our headquarters office at (202) 401-3587 if you have any questions regarding this matter.

Yours sincerely,

Handwritten signature of Peter A. Wieczorek in cursive script, followed by a forward slash and the initials 'mb'.

Peter A. Wieczorek, Director
Eastern Operations
Federal Real Property Assistance Program

cc: Mr. Mark Cobb, Charleston County School District
Ms. Mary Hughes, United States Department of Education



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August 31, 2001

*Proud Sponsor of
National Engineers Week 2000*

Mr. David Scaturro
Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: Zone E - Previously Uninvestigated RFI Units AOC 702 and AOC 703

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The principal author of this document is Kris Garcia. Please contact her at 770/604-9182, extension 476, if you have any questions or comments.

Sincerely,

CH2M HILL

A handwritten signature in black ink, appearing to read "Dean Williamson". The signature is written in a cursive, flowing style.

Dean Williamson, P.E.

cc: Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att
General Distribution

PLEASE REPLY BY:

30 Aug

Date: *8/23/01*

MEMORANDUM

From: Freedom of Information Coordinator, Code 0162D

To: *TONY HUNT ES*

Subj: FREEDOM OF INFORMATION ACT REQUEST, ~~CONFIDENTIAL~~

Encl: (1) Request letter

1. Please send me copies of the documents requested in enclosure (1) or let me know if they are not on file. Also, to determine if we can charge the requester for processing the request, I need the following:

Time spent searching for documents _____ (15 minute increments)

Time spent reviewing documents to ensure documents contain requested information or may be exempt from release _____ (15 minute increments)

Time spent making copies _____ (15 minute increments)

Grade level of the employee processing this request _____

2. The "reply by" date shown at the top of this memo is required to meet time limits imposed by SECNAVINST 5720.42E.

3. If you have any questions regarding this request, please call me at ext. 5809.

Cheryl Dennis

CHERYL DENNIS

TONY - Lets discuss this - he wants to come in & review these documents. Are they all here? Would we want to make them available or should they be withheld for some reason? Cheryl



South Carolina
Department of Transportation

Mrs. Cheryl Dennis
FOIA Officer
P.O. Box 190010
North Charleston, SC 29419

RE: Freedom Of Information Act (Remount Road & I-26 Navy Facility)

Dear Mrs. Dennis:

After conducting a meeting with Mr. Tony Hunt, BRAC Environmental Coordinator, on 6 August 2001, I am requesting that the following information be made available for review under the FOIA. Information needing to be reviewed is as follows:

1. Zone K Naval Annex RCRA Facility Investigation Off-site Ground-water Sampling Tech Memorandum Feb 21, 2001
2. Zone K SWMU 166 Treatability Study Work Plan March 1999
3. Zone K RCRA Facility Investigation Report dated June 1999 (This is a five volume set and I would like to review the Conclusion Section showing the findings and also the recommendations for further action.)
4. Asbestos Inspection report for the Radar Building located on Remount Road
5. Environmental Baseline Survey dated 1996

08-13-01P02:24 RCVD



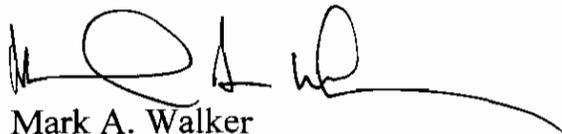
Page 2

SCDOT File # 10.426A
FOIA Request / Navy Facility

Charleston County
Remount Rd & I-26

Thank you for your assistance in obtaining this material for use by the South Carolina Department of Transportation. Please feel free to contact me if you have any questions concerning the request. My address and phone number are listed on the enclosed card.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark A. Walker', with a long horizontal flourish extending to the right.

Mark A. Walker
Right Of Way Agent/UST Investigator
SCDOT

cc Tony Hunt, P.E. BRAC Environmental Coordinator / E-mail

cc Randall Young, SCDOT Program Manager

cc Becky Dickson, Western R/W Program Manager

cc File

7 Aug 2001



CH2MHILL

CH2M HILL
3011 S.W. Williston Road
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32608-3928
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August 29, 2001

Mr. David Scaturo
Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: Technical Memorandum : An Overview of Arsenic Geochemistry, TEA Processes in
Groundwater Systems, and Implications for the CNC Hydrogeologic Environment

Dear Mr. Scaturo:

Enclosed please find four copies of the Technical Memorandum: An Overview of Arsenic
Geochemistry, TEA Processes in Groundwater Systems, and Implications for the CNC
Hydrogeologic Environment. This technical memorandum has been prepared pursuant to
agreements by the CNC BRAC Cleanup Team for completing the RCRA Corrective Action
process.

Sincerely,

CH2M HILL

Dean Williamson, P.E.

cc: Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att



CH2MHILL

CH2M HILL
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August 28, 2001

Mr. David Scaturo
Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: RFI Report Addendum (Revision 0) – SWMU 11, Zone G

Dear Mr. Scaturo:

Enclosed please find four copies of the RFI Report Addendum (Revision 0) for SWMU 11 in Zone G of the Charleston Naval Complex (CNC). This report has been prepared pursuant to agreements by the CNC BRAC Cleanup Team for completing the RCRA Corrective Action process.

The principal author of this document is Bill Elliott. Please contact him at 352/335-7991, extension 2477, if you have any questions or comments.

Sincerely,

CH2M HILL

Dean Williamson, P.E.

cc: Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att



CH2MHILL

CH2M HILL
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32608-3928
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32614-7009
Tel 352.335.7991
Fax 352.335.2959

August 28, 2001

Mr. David Scaturo
Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: RFI Report Addendum (Revision 1) – AOC 619/SWMU 4, Zone F

Dear Mr. Scaturo:

Enclosed please find four sets of replacement pages which serve as Revision 1 of the RFI Report Addendum for AOC 619/SWMU 4 in Zone F of the Charleston Naval Complex (CNC). Below is a summary of the material enclosed with this letter:

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The principal author of this document is Louise Palmer. Please contact her at 704/329-0072 if you have any questions or comments.

Sincerely,

CH2M HILL

Dean Williamson, P.E.

cc: Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att

CH2MHILL TRANSMITTAL

To: Southern Division
Naval Facilities Engineering Command
Code 18713
2155 Eagle Drive
North Charleston, SC 29406

From: Dean Williamson
3011 SW Williston Rd.
Gainesville, FL 32608

Attn: Rob Harrell

Date: August 27, 2001

Re: AOC 607, Zone F

We Are Sending You:

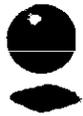
- | | | |
|--|--------------------------|----------|
| <input checked="" type="checkbox"/> Attached | Under separate cover via | |
| Shop Drawings | Documents | Tracings |
| Prints | Specifications | Catalogs |
| Copy of letter | Other: | |

Quantity	Description
1 copy	Phase III Interim Measure Work Plan for Area of Concern 607, Zone F, Electrical Resistance Heating – Source Area Remediation, Preliminary Draft, dated July 2001 for Tony Hunt.

If material received is not as listed, please notify us at once

Remarks:

Copy To:



CH2MHILL
Constructors, Inc.

CH2M HILL
115 Perimeter Center Place NE
Suite 700
Atlanta, GA
30346-1278
Tel 770.604.9095
Fax 770.604.9183

August 27, 2001

158814.ZF.PR.05

Mr. Mansour Malik
Hydrogeologist
South Carolina Department of Health and Environmental Control
Bureau of Land & Waste Management
Division of Hydrogeology
8901 Farrow Road
Columbia, SC 29203

Subject: Request for the Installation of Groundwater Monitoring Wells and
Abandonments of Existing Wells
Phase III Interim Measure Work Plan, Electrical Resistance Heating
AOC 607, Zone F
Charleston Naval Complex, North Charleston, South Carolina

Dear Mansour:

On behalf of the U.S. Navy Southern Division Naval Facilities Engineering Command, CH2M-Jones requests the installation of 2 additional groundwater monitoring wells to evaluate changes in the tetrachloroethene (PCE) source area at AOC 607 during operation of the electrical resistance heating (ERH) system. The requested monitoring wells are in addition to the our earlier request for 15 additional wells. The monitoring wells will be advanced to the top of the clay unit that lies approximately 10 to 13.5 feet below land surface.

Because the ground water will be heated to approximately 100°C, the structural integrity of the Ensafe Interim Measures Pump test wells is of concern (i.e., F607GWP01, F607GWP01D, F607GWP02, F607GWP02D, F607GWV01, F607GWV02, F607FWV03, and F607FWV04). Therefore the existing pump test related wells and piezometers within the treatment area will be compromised and rendered unserviceable. As a result, these monitoring wells will be abandoned and not replaced. The Ensafe recovery well F607GWR01 surface completion will be reconstructed with a CPVC insulator sleeve to insure safety during heating operations. Because of the immediate proximity of the proposed target treatment area, monitoring well F607GW020D will also be abandoned and replaced prior to initiating treatment.

With the exception of monitoring wells F607GWP01D and F607GWP02D, the existing PVC well casings will be removed, and the well bores will be pressure-grouted to the land

Mr. Mansour Malik
Page 2
August 27, 2001
158814.ZF.PR.05

surface with cement grout. Wells F607GWP01D and F607GWP02D will be overdrilled and pressure-grouted to the land surface with cement grout. As requested by Paul Bergstrand, prior to abandonment, F607P01D and F607GWP02D will be sampled for CVOCs. The well abandonment will be performed in accordance with the South Carolina Well Standards and Regulations (R.61-71), including submittal of Water Well Record Form HDI (9-77).

Figure 1 presents the locations of the 2 proposed monitoring wells. Table 1 presents the required detailed information for monitoring well installation approval.

CH2M-Jones has scheduled to complete this work in August 2001. If you have any questions, comments, or require additional information please do not hesitate to contact us.

Sincerely,

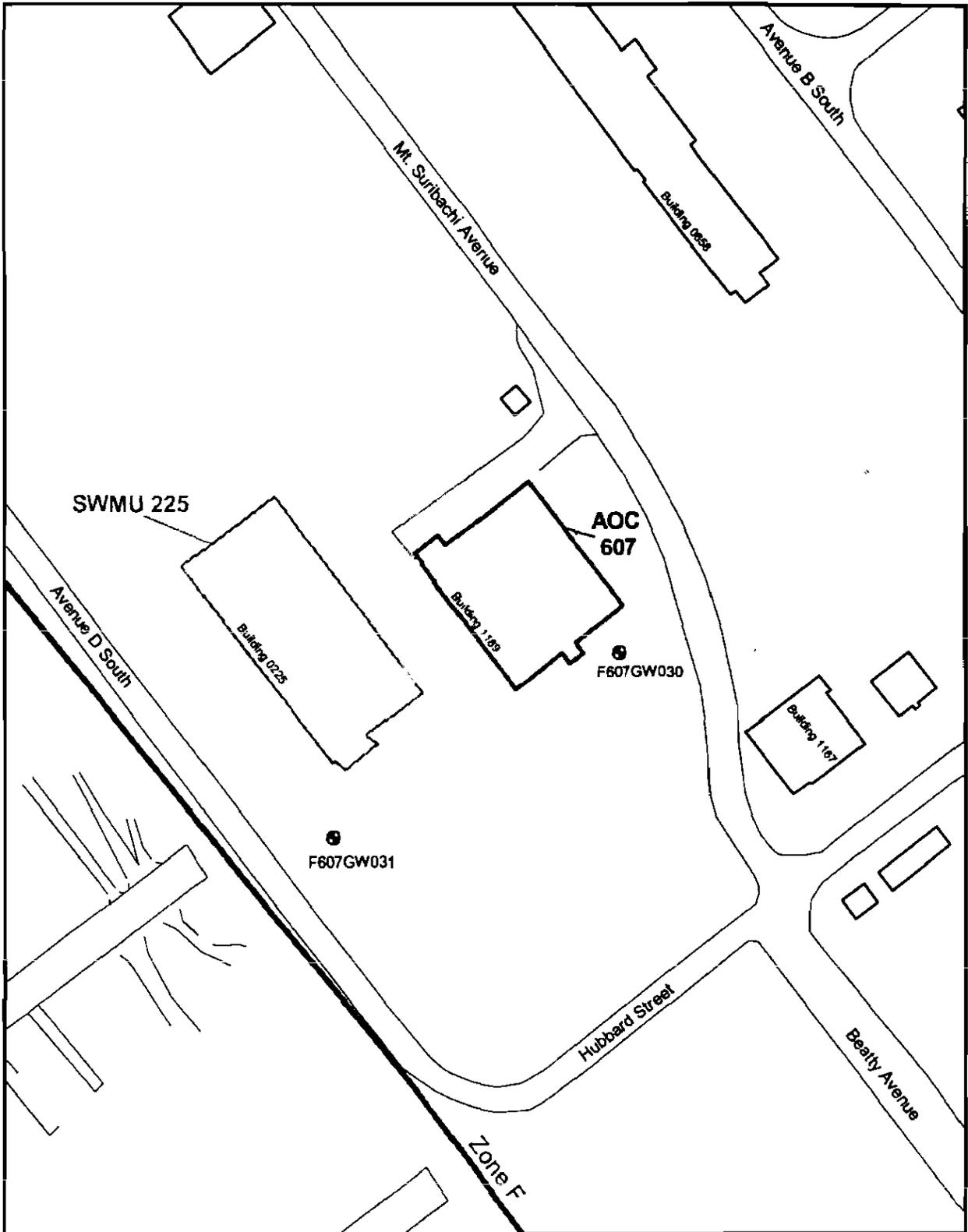
CH2M HILL



Tom Beisel, P.G.
Project Geologist
(770) 604-9182 ext. 367

enclosures

cc: Paul Bergstrand, P.G./SCDHEC
Tony Hunt, P.E./SOUTHDIV
Rob Harrell/SOUTHDIV
Dean Williamson, P.E./CH2M HILL/GNV
Casey Hudson, P.E./CH2M HILL/ORL



- Proposed Groundwater Monitoring Wells
- ▭ Buildings
- ▭ AOC Boundary
- ▭ SWMU Boundary
- ▭ Zone Boundary
- Sidewalk
- Pavement
- Roads
- Surrounding Area

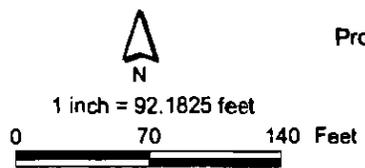
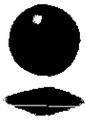


Figure 1
 Proposed Perimeter Groundwater
 Monitoring Locations
 AOC 607, Zone F
 Charleston Naval Complex

CH2MHILL

TABLE 1-1
Monitoring Well Installation Information Summary
AOC 607, Zone F, Charleston Naval Complex

Well Identification	Well Diameter (Inner & Outer)	Method of Drilling	Screen Depth (ft bls)	Screen Length (ft)	Grout (Type, Mixture Ratio, etc.) Finis
607GW030	2-inch (inner)	Hollow Stem Auger	10 to 12.5	5-feet	Portland Type II flush-mc
607GW031	2-inch (inner)	Hollow Stem Auger	10 to 12.5	5-feet	nd Type II flush-mc Bentonite



CH2MHILL

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August 24, 2001

Mr. David Scaturo
Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: RFI Report Addendum (Revision 0) - AOC 602, AOC 604, and SWMU 106/AOC 603,
Zone E

Dear Mr. Scaturo:

Enclosed please find four copies of the RFI Report Addendum (Revision 0) for AOC 602, AOC 604, and SWMU 106/AOC 603 in Zone E of the Charleston Naval Complex (CNC). This report has been prepared pursuant to agreements by the CNC BRAC Cleanup Team for completing the RCRA Corrective Action process.

The principal author of this document is Kris Garcia. Please contact her at 770/604-9182, extension 476, if you have any questions or comments.

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Dean Williamson, P.E.

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Gary Foster/CH2M HILL, w/att



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August 24, 2001

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Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: Phase III Interim Measure Work Plan (Revision 0) – Electrical Resistance Heating,
AOC 607, Zone F

Dear Mr. Scaturro:

The Phase III Interim Measure Work Plan (Preliminary Draft) – Electrical Resistance Heating for AOC 709, Zone F of the Charleston Naval Complex (CNC) was submitted to you in July of this year. Enclosed we are submitting four copies of the set of pages which will serve as the Revision 0 for this Phase III Interim Measure Work Plan. Below you will find a list of the items which have been revised, as well as a brief summary characterizing the nature of this revision. This report has been prepared pursuant to agreements by the CNC BRAC Cleanup Team for completing the RCRA Corrective Action process.

- Revision of cover and spine, dated August 2001
- Signed and sealed certification page
- Complete edition of revised text, dated August 2001, with sufficient revisions made to Sections 2.1, 2.2, 2.4, 2.5.3, 2.5.6, 2.5.7, and 6.3. Sections 3.1.4, 3.2.4, and 3.2.5 were added to the Revision 0 text.
- Revision of Figures 2-1 and 2-4
- Addition of Figures 2-3 and 2-5 through 2-9 to be placed in Appendix A of the IM Work Plan
- Revision of Appendix A, Thermal Remediation Services Work Plan
- Addition of Figures A-1 and A-2, to be placed in Appendix A of the IM Work Plan

Page 2
August 24, 2001

The principal author of this document is Casey Hudson. Please contact him at 407/423-0030, extension 251, if you have any questions or comments.

Sincerely,

CH2M HILL

A handwritten signature in cursive script, appearing to read "Dean Williamson".

Dean Williamson, P.E.

cc: Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att
Casey Hudson/CH2M HILL, w/att



2600 Bull Street
Columbia, SC 29201-1708

21 August 2001

CERTIFIED MAIL

Ms. Amy Daniels
Caretakers Site Office
1895 Avenue F
Charleston Naval Base
North Charleston, SC 29405

RE: Naval Base Charleston (CNAV)
Charleston, South Carolina
SC0-170-022-560

Monitoring Well Request for Replacement Well
Zone A, SWMU 38
Revision 0, Dated 15 August 2001

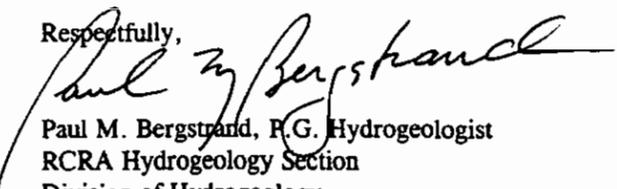
Dear Ms. Daniels:

The above referenced request has been reviewed with respect to R.61-79.265 Subpart F of the South Carolina Hazardous Waste Management Regulations and R.61-71 of the South Carolina Well Standards and Regulations. This request is for the installation of one well to replace A038GW001 within the surficial aquifer. The replacement well should be completed to a maximum depth of approximately fifteen feet.

The well request states the well will be developed using a low flow technique. Low flow well development is not suitable to remove fine solids from the monitoring well. Well development was discussed with Mr. Tom Biesel on 30 July 2001 and on 21 August 2001. Mr. Biesel stated the well will not be developed with low flow techniques.

Attached, please find a copy of the proposed well location. A copy of the well approval form and this letter should be on site during drilling operations. Additional assessment may be required at this well location. Should there be any questions, please contact me at (803) 896-4016.

Respectfully,


Paul M. Bergstrand, P.G. Hydrogeologist
RCRA Hydrogeology Section
Division of Hydrogeology
Bureau of Land and Waste Management

Enclosures
PMB/pmb
HW-01-064

CC: Christine Sanford-Coker, Trident District EQC
Michael Bishop, BOW
David Scaturro, P.E., P.G., Manager Hazardous Waste Permitting Section
Rob Harrell, P.E., Southern Division, Charleston
Steve Parker, EnSafe, 313 Wingo Way, Mount Pleasant, SC 29466
Dean Williamson, CH2M Hill, 3011 S.W. Williston Road, Gainesville, FL 32608-3928

DD010639.PMB



2600 Bull Street
Columbia, SC 29201-1708

August 21, 2001

Ms. Amy Daniell
Charleston Naval Complex
CSO 1895 Ave. F
North Charleston, SC 29405

Re: NOTI
AOC 619/SWMU 4 Zone F, RFI Report Addendum
Charleston Naval Complex
SCO 170 022 560

Dear Ms. Daniell:

The South Carolina Department of Health and Environmental Control (The Department) received the above referenced work plan on June 21, 2001. The Department reviewed the work plan according to applicable State and Federal Regulations and the Charleston Naval Complex Hazardous Waste Permit (the Permit), effective September 17, 1998. Per conversations with the author of the RFI Report Addendum (8/15/01), changes to the referenced document are currently being made in order to satisfy comments made via e-mail by the Department on 8/17/01. These comments are attached in the Engineering Comments under "Specific Comments".

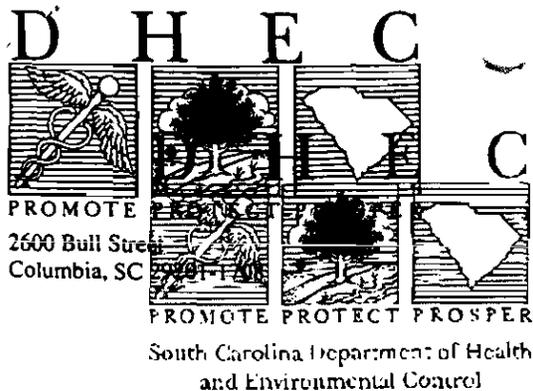
Upon completion of the referenced revisions by the contractor and receipt of these revisions by the Department, the Department will determine the appropriate path forward for the RFI Report Addendum for AOC 619/SWMU 4. If you have any questions regarding this issue, you may contact me at (803) 896-4872.

Sincerely,

Jamelle H. Ellis
Corrective Action Engineering Section
Waste Management Division
Bureau of Land and Waste Management

Attachment

cc: David Scaturo, SCDHEC/Corrective Action Engineering
Rick Richter, Trident EQC
Tony Hunt, SOUTHDIV
Rob Harrell, SOUTHDIV
Dann Spariosu, EPA Region IV
Gary Foster, CH2MHILL/Jones
Dean Williamson, CH2MHILL/Jones



ENGINEERING COMMENTS

The U.S. Navy Southern Division &
Naval Facilities Engineering Command
RFI Report Addendum
SWMU 4/AOC 619

Dated June 2001

Prepared by:
Jamelle H. Ellis, Engineer Associate III
Corrective Action Engineering Section
Division of Waste Management
August 21, 2001

General Comments

1. Section 1.1, p.1-2 Background

As noted in the RFI Report Addendum for AOC 619/SWMU 4, there are no records of any spills or releases associated with "historical" activities at this site. The Department assumes that these "historical" records refer to the waste oil storage yard as defined in the Permit.

Lines 7-10 indicate that Building 1824 is currently being used for 90-day hazardous waste storage. Based on discussions with the author of the referenced document, the Department assumes that the Navy will continue to utilize this building for temporary hazardous waste storage. Please note that it would benefit the Navy to continue maintaining complete and accurate records of any spills associated with current operations until finalization of the FOST for AOC 619/SWMU 4. The Department recommends these records be referenced in the FOST to assure the RDA that no releases occurred subsequent to the RFI Report Addendum approval. Note that no revisions to this document are necessary based on this comment.

Specific Comments

1. Section 1.0, Figure 1-2 and Section 2.0, Figure 2-1

Two elongated structures exist southeast of Building 1824. These structures are not currently addressed in the text of the above-mentioned document. Per our conversation on 8/15/01, the structures are trailers used for some sort of temporary activity and were inadvertently included in the GIS and on figures in the RFI Report Addendum. In order to clarify the administrative record, please include a statement in your Background section addressing the temporary status of these structures.

2. Section 4.1, p.4-1 Surface Soil

Lines 12-13 state "...BEQs, iron and manganese concentrations do not exceed the range of background data from combined Zones F and G...". The Department assumes that these constituents were actually screened against two different sets of background data, one for inorganics and the other for PAHs. In order to clarify the administrative record, please reference individual background data sets for like constituents separately.



CH2MHILL

August 17, 2001

CH2M HILL

3011 S.W. Williston Road

Gainesville, FL

32608-3928

Mailing address:

P.O. Box 147009

Gainesville, FL

32614-7009

Tel 352.335.7991

Fax 352.335.2959

Mr. David Scaturo
Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: Interim Measure Work Plan (Revision 0), Monitored Natural Attenuation Pilot Test –
SWMU 17, Zone H

Dear Mr. Scaturo:

Enclosed please find four copies of the Interim Measure Work Plan (Revision 0), Monitored Natural Attenuation Pilot Test – SWMU 17, Zone H of the Charleston Naval Complex (CNC). This report has been prepared pursuant to agreements by the CNC BRAC Cleanup Team for completing the RCRA Corrective Action process.

The principal author of this document is Rebecca Carovillano. Please contact her at 303/771-0900, extension 5078, if you have any questions or comments..

Sincerely,

CH2M HILL

Dean Williamson, P.E.

cc: Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att



2600 Bull Street
Columbia, SC 29201-1708

August 17, 2001

Ms. Amy Daniell
Charleston Naval Complex
CSO 1895 Ave. F
North Charleston, SC 29405

Re: Conditional Approval
SWMU 42/AOC 505 Zone A, Interim Measure Work Plan
Charleston Naval Complex
SCO 170 022 560

Dear Ms. Daniell:

The South Carolina Department of Health and Environmental Control (The Department) received the above referenced work plan on June 28, 2001. The Department reviewed the work plan according to applicable State and Federal Regulations and the Charleston Naval Complex Hazardous Waste Permit (the Permit), effective September 17, 1998. Based on this review, the Department has determined that it is technically adequate.

The date of this letter will serve as the conditional approval for the IM Work Plan for SWMU 42/AOC 505. The conditions outlined in the attached comments should be included in the IM Completion Report and in the RFI Addendum. Upon completion of the fieldwork outlined in this work plan, an IM Completion Report should be submitted to summarize the results. If you have any questions regarding this issue, please contact Jamelle Ellis at (803) 896-4872.

Sincerely,

David Scaturo, P.E., P.G., Manager
Corrective Action Engineering Section
Waste Management Division
Bureau of Land and Waste Management

Attachment

cc: Jamelle H. Ellis, Corrective Action Engineering
Rick Richter, Trident EQC
Tony Hunt, SOUTHDIV
Rob Harrell, SOUTHDIV
Dann Spariosu, EPA Region IV
Gary Foster, CH2MHILL/Jones
Dean Williamson, CH2MHILL/Jones



ENGINEERING COMMENTS

The U.S. Navy Southern Division &
Naval Facilities Engineering Command
Interim Measures Work Plan
SWMU 42/AOC 505

Dated June 2001

Prepared by:
Janelle H. Ellis, Engineer Associate III
Corrective Action Engineering Section
Division of Waste Management
August 17, 2001

General Comments

1. Section 3.6.1, Waste Management, p. 3-5

Lines 2-7 indicate the waste streams involved in this work plan and the applicable waste management and disposal regulations. This section should include that the stockpiles will be managed in accordance with the USEPA Management of Remediation Waste Guidance. Please include this reference along with the applicable analytical data and disposal information in the SWMU 42/AOC 505 Interim Measure Completion Report. Note that no revisions to this document are necessary.

Specific Comments

1. Section 2.1.1, p. 2-1, SWMU 42

Lines 12-13 indicate "the site currently contains a concrete rack used to support asphalt-related aboveground storage tanks (ASTs)." Appendix C (Detachment Completion Report prepared on July 17, 1997), Section 1.3, *Solid Waste Management Unit 42*, indicates also "this SWMU (42) consists of ...associated tanks and storage area." The Department initially determined this verbiage to suggest there are currently tanks stored at this location. Based on discussions with Paul Favara (8/9/01), the Department understands that there are currently no ASTs or storage containers maintained on the existing concrete rack. Please note that although no changes to this document are necessary, the current status of tanks located within this SWMU should be clarified in the IM Completion Report.

2. Section 2.1.3, p. 2-4, Arsenic

Lines 6-7 reference a "J" qualifier. In order for the Department to accurately interpret data, the text in future documents should clearly define the projected qualifiers ("=", "U", "J", and "UJ"). Please note that no changes to this document are necessary.

3. Section 2.2.1, p.2-7, Soil COCs and Remedial Objectives

Lines 7-10 reference Table 2-5, which "presents the full data set for arsenic in surface soil...sorted from the highest to the lowest value." No Table 2-5 exists in the IM Work Plan. There is a Table 2-4 that includes values for subsurface soil, which is sorted from the highest

to the lowest value. Based on discussions with Paul Favara (8/9/01), Table 2-5 was unintentionally omitted from the report. The Department was provided with a working copy of Table 2-5 in order to review this work plan appropriately. The Department recommends that Table 2-5 be included in the IM Completion Report titled "Table 2-5. Grid and Railroad Track Data, Arsenic, Zone A" and addressed as such in the text. This would avoid possible confusion of railroad/background samples with actual surface soil samples. Note that no changes to this document are necessary. Please ensure these changes are reflected in the IM Completion Report.

4. Section 2.2.1, p.2-7, Soil COCs and Remedial Objectives

Lines 17-20 reference Table 2-5 as characterizing BEQ concentrations. No Table 2-5 exists in the IM Work Plan. This may be a reference to Table 2-3 which includes "BEQ Results from Surface Soil Samples Collected at SWMU 42/AOC 505." The Department assumes this is a misprint and reviewed the document accordingly. Although no changes to this document are necessary, Table 2-5 should be included and references to table numbers should be corrected. Please ensure these changes are reflected in the IM Completion Report.

5. Section 3.1.2, p.3-3, BEQ Removal

Lines 7-10 reference backfilled soil to be used as clean fill once the area of concern is excavated. There are no indications in the IM Work Plan of controls in place to ensure that the soils being used to backfill are not above the permissible levels for arsenic and BEQs. Please provide analytical data on and a characterization of backfill and source in the IM Completion Report.



2600 Bull Street
Columbia, SC 29201-1708

August 16, 2001

Ms. Amy Daniell
Caretaker Site Office
NAVFACENGCOM, Southern Division
P.O. Box 190010
North Charleston, SC 29419-9010

RE: Approval - Sampling Plan
Surface Soil Investigation, Area of Concern 643, Zone G
Charleston Naval Complex (CNC)
SC0 170 022 560

Dear Ms. Daniell:

The South Carolina Department of Health and Environmental Control (the Department) has reviewed the above referenced technical memorandum according to applicable State and Federal Regulations, and the CNC Hazardous Waste Permit, effective September 17, 1998. Based on this review, the Department finds this document to be technically adequate and approves the proposed work plan.

Thank you for your cooperation in this matter. If you have any questions or concerns, please contact me at (803) 896-4185.

Sincerely,

David Scaturo, PE, PG
Manager, Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

Attachment

cc: Tony Hunt, PE, SOUTHDIV
Rob Harrell, PE, SOUTHDIV
Dean Williamson, PE, CH2M-Jones
Gary Foster, PE, CH2M-Jones
Dann Spariosu, PhD, EPA Region 4
Rick Richter, Trident EQC District



CH2MHILL

CH2M HILL
3011 S.W. Williston Road
Gainesville, FL
32608-3928
Mailing address:
P.O. Box 147009
Gainesville, FL
32614-7009
Tel 352.335.7991
Fax 352.335.2959

August 16, 2001

Mr. David Scaturo
Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: RFI Report Addendum (Revision 0) – AOC 709(F), Zone F

Dear Mr. Scaturo:

Enclosed please find four copies of the RFI Report Addendum (Revision 0) – AOC 709(F), Zone F of the Charleston Naval Complex (CNC). This report has been prepared pursuant to agreements by the CNC BRAC Cleanup Team for completing the RCRA Corrective Action process.

The principal author of this document is Jim Edens. Please contact him at 352/335-5877, extension 2491, if you have any questions or comments.

Sincerely,

CH2M HILL

Dean Williamson, P.E.

cc: Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att



CH2MHILL
Constructors, Inc.

CH2M HILL
115 Perimeter Center Place NE
Suite 700
Atlanta, GA
30346-1278
Tel 770.604.9095
Fax 770.604.9183

August 15, 2001

158814.ZA.PR.00

Mr. Paul Bergstrand, P. G.
Hydrogeologist
South Carolina Department of Health and Environmental Control
Bureau of Land & Waste Management
Division of Hydrogeology
8901 Farrow Road
Columbia, SC 29203

Subject: Request for the Installation of Groundwater Monitoring Wells
Corrective Measures Study Work Plan
SWMU 38, Zone A
Charleston Naval Complex, North Charleston, South Carolina

Dear Paul:

On behalf of the U.S. Navy Southern Division Naval Facilities Engineering Command, CH2M-Jones requests the installation of one groundwater monitoring well to replace a previously abandoned shallow well. The well (A038GW001) was removed during an interim measures soil excavation performed by the Navy earlier. The replacement monitoring well will be constructed similar to the previous well, screening the surficial aquifer above the Ashley Formation. Well installation will be performed in accordance with the South Carolina Well Standards and Regulations (R.61-71).

Figure 1 presents the location of the proposed monitoring well. Table 1 presents the required detailed information for monitoring well installation approval.

CH2M-Jones has scheduled to complete this work in August 2001. If you have any questions, comments, or require additional information please do not hesitate to contact us.

Sincerely,

Mr. Paul Bergstrand, P.G.

Page 2

August 15, 2001

158814.ZA.PR.00

CH2M HILL

A handwritten signature in black ink, appearing to read "Tom Beisel". The signature is fluid and cursive, with a large initial "T" and "B".

Tom Beisel, P.G.

Project Geologist

(770) 604-9182 ext 367

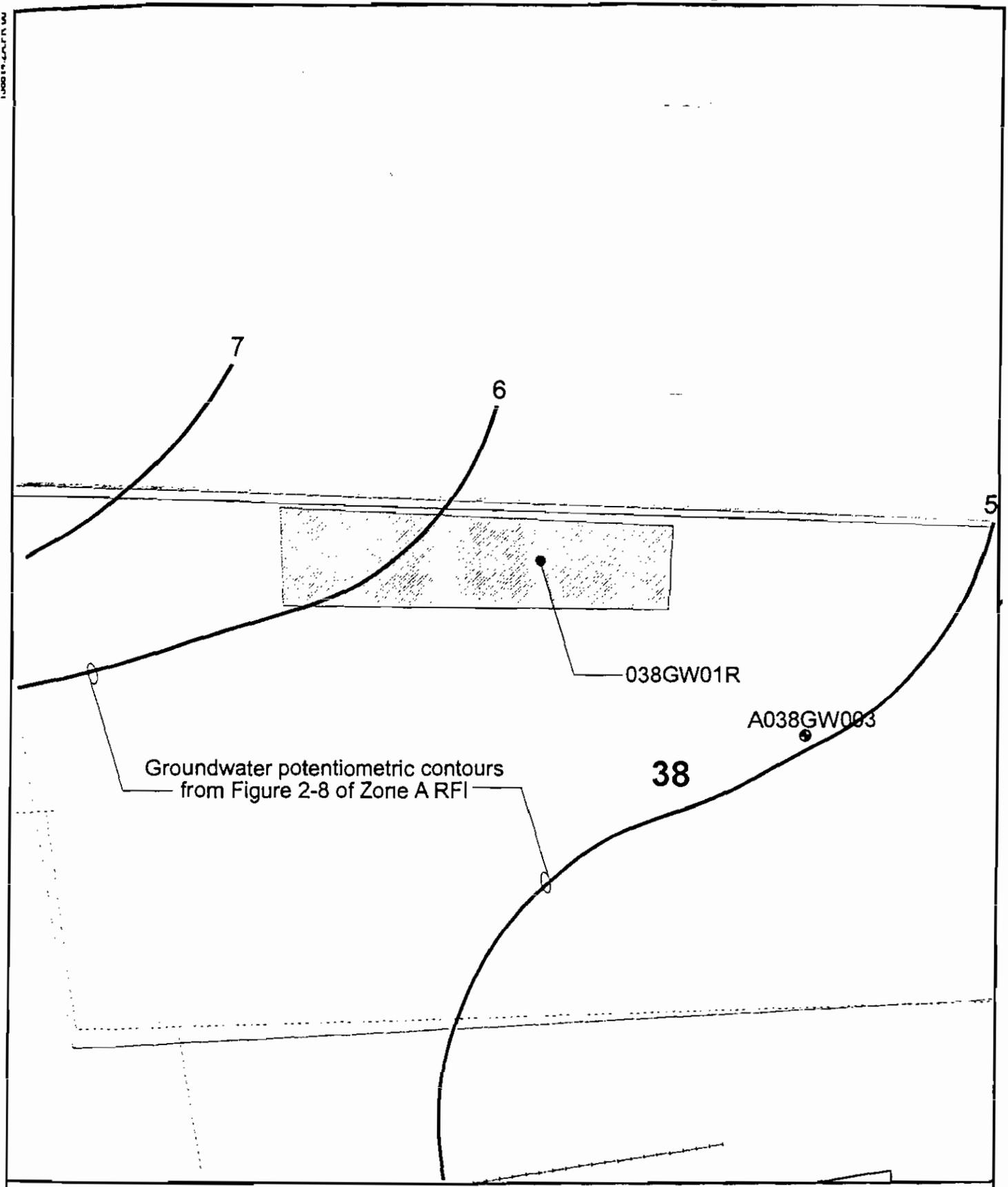
enclosures

cc:

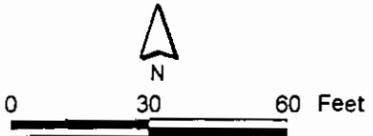
Tony Hunt, P.E./SOUTHDIV

Rob Harrell/SOUTHDIV

Dean Williamson, P.E./CH2M HILL/GNV



- Groundwater Well
- Proposed Well Location
- Railroads
- Fence
- ▨ Approximate Area of IM Excavation
- ▭ AOC Boundary
- ▭ Buildings
- SWMU Boundary
- Zone Boundary



Note: Original Figure is in color.

Figure 1
 Proposed Well Location
 SWMU 38, Zone A
 Charleston Naval Complex

TABLE 1
Monitoring Well Installation Information Summary
SWMU 38, Zone A, Charleston Naval Complex

Well Identification	Well Diameter (Inner & Outer)	Method of Drilling	Screen Depth (ft bis)	Screen Length (ft)	Screen Mesh/Slot Size	Expected Total Depth of Well (ft bis)	Material of Well Construction	Analysis Parameters	Development (e.g., low flow, baller, etc.)	Grout (Type, Mixture Ratio, etc.)	Finish Type	Purpose for Well	Other/ Comments
038GW001	2-inch (inner)	Hollow Stem Auger	10 to 15	10-feet	0.01	10 to 15	Schedule 40 PVC	Pesticides	Low Flow Pump	Portland Type II with 5% Bentonite	flush-mount	Source Area monitoring	Replacement for abandoned well

CH2MHILL

TRANSMITTAL

To: Mr. David Scaturo
Division of Hazardous and Infectious
Wastes
South Carolina Department of Health
and Environmental Control

From: Vijaya Mylavarapu
(352) 335-7991

Date: August 14, 2001

Re: Technical Memorandum: *Results from Additional Background Sampling of the CNC Railroad Lines and Naval Annex (Zone K)*

Quantity	Description
4	Four (4) copies of the Technical Memorandum: <i>Results from Additional Background Sampling of the CNC Railroad Lines and Naval Annex (Zone K)</i>

The attached forty (40) pages of material, Technical Memorandum: Results from Additional Background Sampling of the CNC Railroad Lines and Naval Annex (Zone K), are to be appended to the PAHs Background Study Report, *Technical Information for Development of Background BEQ Values* (CH2M-Jones, February 2001). Please insert this material, which has been 3-hole drilled for your convenience, into the abovementioned report.

If material received is not as listed, please notify us at once.

Remarks:

Copy To:

Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att



CH2MHILL

CH2M HILL

3011 S.W. Williston Road

Gainesville, FL

32608-3928

Mailing address:

P.O. Box 147009

Gainesville, FL

32614-7009

Tel 352.335.7991

Fax 352.335.2959

August 9, 2001

Mr. David Scaturo
Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: Phase II Interim Measure Work Plan (Revision 0), – SWMU 196, Zone H

Dear Mr. Scaturo:

Enclosed please find four copies of the Phase II Interim Measure Work Plan (Revision 0), – SWMU 196, Zone H of the Charleston Naval Complex (CNC). This report has been prepared pursuant to agreements by the CNC BRAC Cleanup Team for completing the RCRA Corrective Action process.

The principal author of this document is Paul Favara. Please contact him at 352/335-5877, extension 2396 if you have any questions or comments.

Sincerely,

CH2M HILL

Dean Williamson, P.E.

cc: Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att



CH2MHILL

CH2M HILL
3011 S.W. Williston Road
Gainesville, FL
32608-3928
Mailing address:
P.O. Box 147009
Gainesville, FL
32614-7009
Tel 352.335.7991
Fax 352.335.2959

August 8, 2001

Mr. David Scaturo
Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: RFI Report Addendum – Phase II (Revision 0), Zone H and CMS Investigation
Report Addendum – SWMU 159/AOC 653 (Revision 0), Zone H

Dear Mr. Scaturo:

Enclosed please find four copies of the RFI Report Addendum (Revision 0), Zone H and four copies of the CMS Investigation Report Addendum – SWMU 159/AOC 653 (Revision 0), Zone H of the Charleston Naval Complex (CNC). This report has been prepared pursuant to agreements by the CNC BRAC Cleanup Team for completing the RCRA Corrective Action process. The principal author of these reports is Sam Naik. Please do not hesitate to contact him at (770) 604-9095 should you have any questions or comments.

Sincerely,

CH2M HILL

Dean Williamson, P.E.

cc: ✓ Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att



CH2MHILL

CH2M HILL

3011 S.W. Williston Road

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Mailing address:

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32614-7009

Tel 352.335.7991

Fax 352.335.2959

August 6, 2001

Mr. David Scaturo
Division of Hazardous and Infectious Wastes
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Re: RFI Report Addendum (Revision 0), SWMU 120, Zone G

Dear Mr. Scaturo:

Enclosed please find four copies of the RFI Report Addendum (Revision 0), for SWMU 120 in Zone G of the Charleston Naval Complex (CNC). This report has been prepared pursuant to agreements by the CNC BRAC Cleanup Team for completing the RCRA Corrective Action process.

Please contact me if you have any questions or comments.

Sincerely,

CH2M HILL

Dean Williamson, P.E.

cc: Rob Harrell/Navy, w/att
Gary Foster/CH2M HILL, w/att



2600 Bull Street
Columbia, SC 29201-1708

August 2, 2001

Ms. Amy Daniell
Caretaker Site Office
Charleston Naval Complex
CSO 1895 Avenue F
North Charleston, SC 29405

RE: CMS Work Plan for SWMU 38, Zone A, Revision 0, dated February 2001
Charleston Naval Complex (CNC)
SC0 170 022 560

Dear Ms. Daniell:

The South Carolina Department of Health and Environmental Control (the Department) has reviewed the above referenced document with respect to applicable State and Federal Regulations, the CNC Hazardous Waste Permit, effective September 17, 1998. The attached comments were generated based on this review. These comments do not appear to alter the proposed field activities and therefore, the Department is granting approval for the Navy to initiate field implementation of the proposed work. The attached comments should be addressed in the revised document or subsequent CMS Report.

Thank you for your cooperation in this matter. If you have any questions or concerns, please contact me at (803) 896-4185.

Sincerely,

David Scaturo, PE, PG
Manager, Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

Attachment

cc: Tony Hunt, PE, SOUTHDIV
Rob Harrell, PE, SOUTHDIV
Dean Williamson, PE, CH2M-Jones
Gary Foster, PE, CH2M-Jones
Dann Spariosu, PhD, EPA Region 4
Rick Richter, Trident EQC District

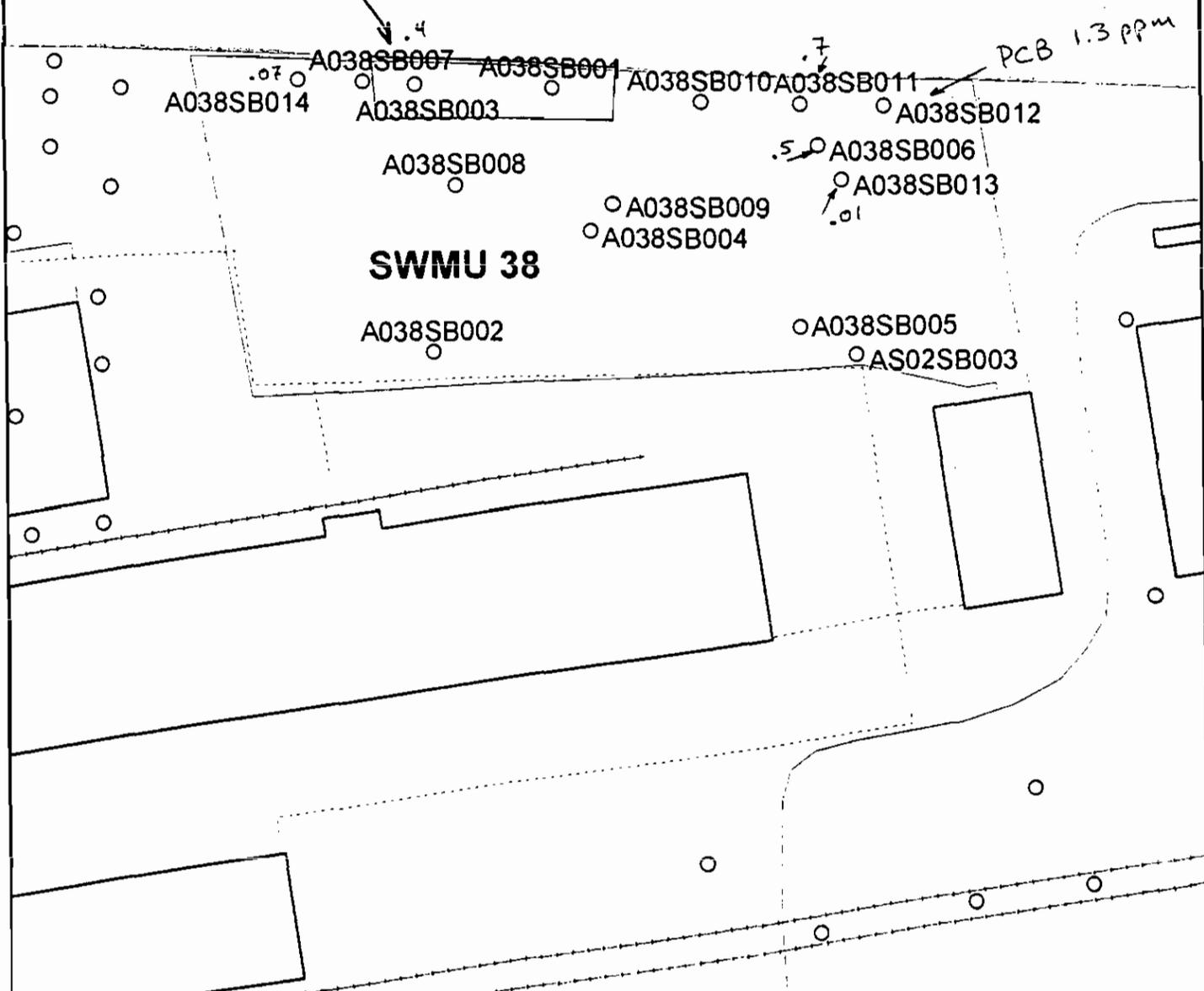
South Carolina Department of Health and Environmental Control comments on: Corrective Measures Study (CMS) Work Plan for SWMU 38 located in Zone A of the Charleston Naval Complex, SCO 170 022 560, Revision 0, dated February 2001, received February 15, 2001.

Comments by Mihir Mehta:

1. The referenced document is named, "CMS Work Plan Rational for No Further Action". This is not accurate. The goal stated within the document is to delineate the surface and subsurface soil contamination area and groundwater plume. The Navy and CH2MHILL acknowledged this error and therefore, the Department recommends the title change during the next revision or subsequent document (i.e., CMS Report).
2. Section 1.1. Background and Summary for CMS Work Plan. Page 1-1.
Lines 27-29 states that, "The Zone A RFI for SWMU 38 concluded that surface soil chemicals of concern (COCs) at SWMU 38 included several metals, polychlorinated biphenyl (PCB), and chlorinated pesticides; no COCs were identified." The last four words "no COCs were identified" appear to be out of context with the rest of the sentence. Please revise.
3. Section 2.0. Technical Basis and Rational for Interim Measures.
Please clarify what Interim Measures is being referenced here. The referenced document is a CMS work plan and not an interim measures. If the title is referring to the interim measures conducted by the Detachment in 1998, please clarify in the title of this section. Also, note that this section describes the previous RFI Report results and COC uncertainty analysis process.
4. Section 3.0. Interim Measures Work Plan.
Please change the title of this section to CMS Work Plan or clarify what interim measures are being referred to. Please be consistent in naming the referenced document. Either it is an interim measures or CMS Work Plan, and according to the discussion with CH2MHILL the referenced document is a CMS Work Plan.

REPORTED PCB IN SOILS (PPM)

EXCAVATED AREA



- Soil Sample Locations
- - - Fence
- - - Railroads
- - - Roads
- ▭ AOC Boundary
- ▭ Buildings
- - - SWMU Boundary
- - - Zone Boundary
- ▭ Approximate Area of IM Excavation

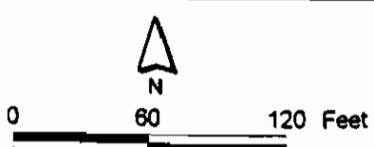


Figure 2-1
 Sample Soil Locations
 SWMU 38, Zone A
 Charleston Naval Complex

Note: Original Figure is in color.