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SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL  
COMMENTS ON RESOURCE CONSERVATION AND RECOVERY ACT FACILITY  
ASSESSMENT REPORT VOLUME 6 FOR AREA OF CONCERN 711 THROUGH 718 (AOC 711  
THROUGH 718) CNC CHARLESTON SC

5/23/2001

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2600 Bull Street  
Columbia, SC 29201-1708

May 23, 2001

CERTIFIED MAIL

Matthew Humphrey  
Caretaker Site Office  
NAVFACENGCOCM, Southern Division  
P. O. Box 190010  
North Charleston, SC 29419-9010

Re: RCRA Facility Assessment (RFA) Volume VI for Area of Concern (AOC) 711 through 718, located in Charleston Naval Complex (CNC), SCO 170 022 560, revision 1.0, dated February 23, 2001, received February 27, 2001.

RCRA Facility Assessment (RFA) for Area of Concern (AOC) 720 located in Zone G of the Charleston Naval Complex (CNC), SCO 170 022 560, revision 0, received April 12, 2001.

Dear Mr. Humphrey

The South Carolina Department of Health and Environmental Control (Department) has received the RFA Report Volume VI for Area of Concern (AOC) 711 through 718 and AOC 720 which are associated with Oil/Water Separators and Waste Oil Tanks at CNC on February 23, 2001 and April 12, 2001, respectively submitted pursuant to the CNC Hazardous Waste Permit Condition II. B.2. The Department has reviewed the above referenced Report according to applicable State and Federal Regulations, and the Charleston Naval Complex Hazardous Waste Permit, effective September 17, 1998. The attached specific comment should be addressed during the development and review of the confirmatory sampling (CS) work plan or report for each AOC.

The document recommends that the referenced sites associated with Oil/Water Separators and Waste Oil Tanks be considered as new AOCs that require additional investigation. The Department concurs with the Navy's recommendation. To remain consistent with the CNC-RCRA Permit, these sites will be designated as AOC 711 through 718 and AOC 720, requiring CS and will be included in the next modification to the Permit. In accordance with Permit Condition II.D.1, CS Work Plan, the Navy is required to submit to the Department CS work plans for all AOCs stated above within forty five (45) calendar days of the receipt of this letter.

Mr. Matthew Humphrey  
May 23, 2001  
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Should you have any questions regarding these comments, please contact Mihir Mehta at (803) 896-4088 or Paul Bergstrand at (803) 896-4016.

Sincerely,



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

Attachment: Memorandum from Paul Bergstrand to Mihir Mehta dated May 22, 2001.

cc: Paul Bergstrand, Hydrogeology  
Mihir Mehta, Corrective Action Engineering  
Rick Richter, Trident EQC  
Dean Williamson, CH2MHILL  
Gary Foster, CH2MHILL  
Dann Spariosu, EPA Region IV  
Rob Harrell, SOUTHDIV  
Tony Hunt, SOUTHDIV

RCRA Facility Assessment

AOCs 711 through 718

Paul M. Bergstrand

22 May 2001

1. Comment #3, dated 31 January 2001, pointed out that the focus of this RFA was more on the buildings served by the OWS and not on the OWS. The comment also stated "*A revised RFA (AR) document is not necessary to proceed however this information must be included in the CS workplan.*" It was noted in the Navy's Response to Comments for this comment that the information requested by the Department "*will be provided in the CS Report for each AOC.*" Because the RFA and CS Workplan will not contain the requested AOC information, the Departments ability to scope the CS workplan with the Navy will be limited. Because the Navy has decided not to provide all the AOC information in the RFA or CS workplan the CS Report must address the following:

1. SITE IDENTIFICATION.

Tanks and OWS at the Naval Complex routinely received a unique identification number from the Navy. Information such as this should be included in this section to allow for cross referencing with UST registrations and Tank closure reports.

4. GENERAL DIMENSIONS, CAPACITIES AND STRUCTURAL DESCRIPTIONS OF UNIT(S) (SUPPLY ANY AVAILABLE PLANS/DRAWINGS).

This section should include information describing the volume, construction materials, general condition (i.e., cracks, deteriorated concrete, damaged piping, loose or damaged joints, etc.), buildings or areas served, piping runs, sinks, solvent vats, floor drains, sewer lines, associated USTs or any other relevant information.

This section should also provide detailed scaled sketches, as built drawings maps or figures to show the location of the OWS as well as any USTs, SUMUs, AOCs and/or monitoring wells in relation to the OWS being described.

5. DATES THE UNIT(S) WAS(WERE) OPERATED.

This section could compare the age of the OWS to the age of the facility the OWS served. This section should also indicate when tanks were closed and reference the closure report and the status of that report.

RCRA Facility Assessment

AOCs 711 through 718

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7. ALL AVAILABLE INFORMATION PERTAINING TO ANY RELEASE OF HAZARDOUS WASTE OR HAZARDOUS CONSTITUENTS FROM SUCH UNITS(S) (TO INCLUDE GROUNDWATER DATA, SOIL ANALYSES, AIR, AND/OR SURFACE WATER DATA).

Include all analytical results from CS sampling collected from the AOC in question as well as from any nearby SWMU or AOC or from a UST assessment. Existing wells may be utilized only if deemed appropriate and equal to RFI quality sampling and analysis. Such decisions will be made on a site by site basis.

2. The Department remains willing to discuss the CS workplan and to conduct site visits with the Navy in order to help with the review and approval of the CS workplan.