

N61165.AR.004553
CNC CHARLESTON
5090.3a

TRANSMITTAL FOR CORRECTIVE MEASURES STUDY WORK PLAN RATIONALE FOR NO
FURTHER ACTION FOR SOLID WASTE MANAGEMENT UNIT 47 (SWMU 47) ZONE C CNC
CHARLESTON SC
5/14/2001
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2600 Bull Street
Columbia, SC 29201-1708

May 14, 2001

CERTIFIED MAIL

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

Re: Corrective Measures Study (CMS) Work Plan (Rational for NFA) for SWMU 47 located in Zone C of the Charleston Naval Complex, SCO 170 022 560, Revision 1.0, dated March 2001, received April 2, 2001.

Dear Mr. Humphrey:

The South Carolina Department of Health and Environmental Control (Department) has reviewed the above referenced document according to applicable State and Federal Regulations, and the Charleston Naval Complex Hazardous Waste Permit, effective September 17, 1998. Based on this review and the site wide PAH information provided the Department approves the no further action (NFA) proposal for this site. Further, the CNC should note that the Department's approval is based on the information provided to date. Any new information found to be contradictory may require further action.

The Navy should note that the CNC RCRA Permit has not been modified to document the above stated decision for SWMU 47. The Department will make the necessary changes to the CNC RCRA Permit during the next Permit Modification to document the NFA decision for SWMU 47. This fact should be clearly stated in the property transfer document.

Should you have any questions regarding this issue, 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

Attachments:

1. Memorandum from Susan Peterson to Mihir Mehta dated May 11, 2001.
2. Memorandum from Mansour Malik to Mihir Mehta dated May 11, 2001.

cc: Paul Bergstrand, Hydrogeology
Mansour Malik, Hydrogeology
Susan Peterson, Corrective Action Engineering
Rick Richter, Trident EQC
Tony Hunt, SOUTHDIV
Rob Harrell, SOUTHDIV
Dann Spariosu, EPA Region IV
Dean F. Williamson, CH2MHILL/JONES
Gary Foster, CH2MHILL/JONES

The Document referenced above has been reviewed with respect to the requirement of R.61-79 of the South Carolina Hazardous Waste Management Regulations, The Environmental Protection Agency's (EPA) RCRA Facility Assessment Guidance Document dated October 1988, and the revised EPA Region IV Environmental Compliance Branch Standard Operating Procedures and Quality assurance Manual (SOP/QAM) dated May 1996, the CNAV Final Comprehensive Sampling and Analysis Plan dated 30 August 1994, CERCLA 120(h) as amended.

The Hydrogeology Section upon reviewing the Revision 01 document for SWMU 47, Zone E recommends the approval of this site for No Further Action (NFA). The revised document and the responses from CH2MHill have fully addressed the concerns that the Division of Hydrogeology has. The railroad PAHs adopted value in CH2MHill's memorandum dated May, 3,2001 satisfies the concern brought up by the Department about the relatively high hits of PAHs in the sample locations C047SB005 and C047SB0016. The rest of the comments that the Department generated in reviewing Revision 00 of this CMS WP should be observed in future similar public documents.