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LETTER FROM SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL
CONTROL APPROVING CORRECTIVE MEASURES STUDY RATIONALE FOR NO
FURTHER ACTION AREA OF CONCERN 518 (AOC 518) ZONE C CNC CHARLESTON SC
7/17/2001
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2600 Bull Street
Columbia, SC 29201-1708

July 17, 2001

COMMISSIONER:
Douglas E. Bryant

Ms. Amy Daniell, Environmental Engineer
Caretaker Site Office 1895, Avenue F
North Charleston, SC 29405

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Re: Approval
CMS WP Rationale for NFA Rev. 1, dated May 2001
AOC 518, Zone C
Charleston Naval Complex
SC0 170 022 560

Dear Ms. Daniell:

The South Carolina Department of Health and Environmental Control (Department) has reviewed the above referenced document, dated May 2001 for AOC 518 located in Zone C according to applicable State and Federal Regulations, and the Charleston Naval Complex Hazardous Waste Permit (Permit), effective September 17, 1998. Although the Permit requires CS for AOC 518, the site was investigated as part of the Zone C RFI.

AOC 634 is located near the center of Zone C and consists of the former site of several coal storage bins that were used from approximately 1926 to 1937. In response to the Department's concerns about lead-impacted soil, the Navy conducted an IM to delineate and excavate the extent of the lead-impacted soil (i.e., those soils with lead in excess of 400 mg/kg). Upon review of the IM Completion Report (July 2001), the Department concurs that the Navy has met this objective.

The CMS WP Rationale for NFA at AOC 518 incorporates the IM results. The CMS WP addresses the required close-out issues as part of the NFA rationale. Based on the review of the CMS WP, the Department now approves no further action (NFA) as the final corrective action decision for AOC 518.

The Navy should note that the Permit has not been modified to document the above stated decision for AOC 518. The current Permit classification for AOC 518 is CS. The Department will make the necessary changes to the Permit during the next Permit Modification to document this NFA decision.

To note, the Navy should satisfy all requirements of other program areas of the Department as deemed appropriate. 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 might require further action.

Should you have any questions regarding this issue, please contact Susan Peterson at (803) 896-4182.

Sincerely,

A handwritten signature in cursive script that reads "David Scaturo".

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

cc: Susan Peterson, Corrective Action Engineering
Rick Richter, Trident EQC
Dean Williamson, Gary Foster CH2M-Hill
Dann Spariosu, EPA Region IV
Tony Hunt, Rob Harrell, SOUTHDIV

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.

AOC 518 in Zone C is the former site of several storage bins that were used from 1926 -1937. The work plan for this site was approved earlier. The concern was some elevated lead sampling points above the surface soil criteria. CH2M - Jones decided an IM soil excavation plan, which was approved by the Department. This Completion Report presents the Interim Measure of soil excavation activities and documents the results of the implemented IM. The Hydrogeology Section recommends the approval of the completion report for Zone C, AOC 518 as written.