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LETTER FROM SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL
CONTROL APPROVING NO FURTHER ACTION FOR AREA OF CONCERN 628 (AOC 628)
ZONE G CNC CHARLESTON SC
1/16/2002
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2600 Bull Street
Columbia, SC 29201-1708

January 16, 2002

COMMISSIONER:
Douglas E. Bryant

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

BOARD:
Bradford W. Wyche
Chairman

William M. Hull, Jr., MD
Vice Chairman

Re: Approval of NFA request as detailed in
RFI Report Addendum for AOC 628, Zone G, received December 21, 2001
Charleston Naval Complex
SC0 170 022 560

Mark B. Kent
Secretary

Howard L. Brilliant, MD

Brian K. Smith

Dear Ms. Daniell:

Rodney L. Grandy

The South Carolina Department of Health and Environmental Control (Department) has reviewed the above referenced document, dated December 2001 for AOC 628 located in Zone G.

Larry R. Chewning, Jr., DMD

AOC 628 is an open area southeast of Building 68 that was reportedly used from 1962 to 1967 for abrasive blasting of large metal parts, including ship parts. The site is located approximately 550 ft west of the Cooper River.

This RFI Report Addendum documents the conclusions of the RFI report, provides results of limited post-RFI sampling, and recommends the site for NFA under the RCRA Permit. Based on the review of this addendum, the Department concurs that NFA is appropriate as the final corrective action decision.

The Navy should note that the Permit has not been modified to document the above stated decision for AOC 628. The current Permit classification for AOC 628 is CS. The upcoming Permit Modification will incorporate this 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.

If you have any questions regarding this issue, please contact Susan Peterson at (803) 896-4182 or Mansour Malik at (803) 896-4169.

Sincerely,



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

Attachments:

memorandum: Mansour Malik to Susan Peterson, January 10, 2002

comments by Susan Peterson, January 16, 2002

cc: Jerry Stamps, Susan Peterson, Mansour Malik, DHEC
Rick Richter, Trident EQC
Dean Williamson, Gary Foster CH2M-Hill
Dann Spariosu, EPA Region IV
Tony Hunt, Rob Harrell, SOUTHDIV

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Summary Notes

RFI Report Addendum, AOC 628 in Zone G

Prepared by Susan Peterson, January 16, 2002

The Zone G RFI report recommendations for AOC 628 included a CMS for surface soils to address the COCs (arsenic, chromium, and BEQs) that were identified. In addition, SPLP analysis was performed in order to develop site-specific SSLs.

CH2M-Jones has evaluated this information and have used team decisions (such as the base-wide BEQ value of 1304 ug/kg) and comparison of results to zone and base-wide background ranges to support their position that antimony, arsenic, total chromium, copper, lead, and BEQs are not COCs in surface soil.

SPLP results confirm that the constituents are not leaching from surface soils into groundwater at significant concentrations (they are leaching at a concentration below the drinking water criteria).

Following review of this report and discussions with CH2M-Jones's Bill Elliott, I concur that NFA is the appropriate classification for AOC 628.

Site History and Status:

AOC 628 consists of an open area southeast of building 68 that was used from 1962-1967 for abrasive blasting of large metal parts, including ship parts. Materials stored or disposed of included spent blasting media, paint and metallic residues, organic solvent wastes, and petroleum products. No visible evidence of the former activities remains at the unit. A high-pressure fuel line covered with gravel and stones currently run beneath the site.

This RFI Report Addendum provides information to support conclusion of the Zone G RFI Report, Revision 00 including additional post- RFI sampling. Recommendation is for No Further Action (NFA).

Groundwater was not investigated at this site as part of the RFI field activities. The soil data indicate that no releases of inorganics, VOCs, SVOCs, or PAHs have occurred at this unit. No impact to groundwater is noted.

The Division of Hydrogeology concurs that investigation of this unit regarding groundwater has been satisfactorily completed. As no remedial action for groundwater is required, the Division recommends approval of this RFI Report Addendum as written. An NFA (No Further Action) can be granted for this site.