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LETTER FROM SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL
CONTROL REQUESTING TRANSFER FROM RESOURCE CONSERVATION AND
RECOVERY ACT SUBTITLE TO UNDERGROUND STORAGE TANK SUBTITLE FOR AREAS
OF CONCERN 662, 675, 676 677 AND 709 (AOC 662, 675, 676, 677

2/5/2002

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2600 Bull Street
Columbia, SC 29201-1708

February 5, 2002

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

RE: Request for Transfer from RCRA Subtitle C to RCRA Subtitle I (UST Program)
Areas of Concern (AOCs) 662, 675, 676, 677, 709(F)
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 request with respect to applicable State and Federal Regulations, the CNC Hazardous Waste Permit, correspondence from Hartley to Rose dated August 28, 1997 (AOC 662), correspondence from Peterson to Shepard dated May 7, 1999 (AOCs 675, 676, 677), and correspondence from Spariosu to Hunt dated December 7, 2001 (AOC 709[F]). It should be noted that the Permit shall be modified pursuant to R.61-79.270.41 to change the status of these units. Specific information regarding these AOCs is as follows:

AOC 662: Former gasoline station. Two unregistered steel USTs may remain on site.

AOCs 675, 676, 677: AOC 675 is a 25,000-gallon UST (Building NS-4) installed in 1952. The UST supplied fuel oil to a former electrical boiler (AOC 676 – Building NS-2) that operated from 1958 to 1992. The UST is covered by a concrete bunker, and has a steel top and vent pipe. There is documented history of fuel oil spills at this site, ranging from 3 to 500 gallons. AOC 677 is the area surrounding Building NS-2. A seaplane refueling operation was reportedly located in this area.

AOC 709(F): Former fuel distribution system. Based on a review by EPA Region 4, this AOC was recommended for a No Further Action (NFA) under the RCRA Subtitle C corrective action program, with additional actions for both subsurface soil and groundwater to occur under the RCRA Subtitle I UST program. The RFI Report Addendum asserts that elevated arsenic levels are the result of arsenic-reducing bacteria fueled by hydrocarbons present in the subsurface soils.

Ms. Amy Daniell
February 5, 2002
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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: Letter from Harrell to Litton dated January 22, 2002

Attachment: Letter Peterson to Shepard dated May 7, 1999

Attachment: Letter from Hartley to Rose dated August 28, 1997

cc: Michael Bishop, SCDHEC Bureau of Water
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