

N61165.AR.004873
CNC CHARLESTON
5090.3a

LETTER FRO SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL
CONTROL REQUESTING TRANSFER OF SOLID WASTE MANAGEMENT UNIT 178 (SWMU
178) AND AREA OF CONCERN 656 (AOC 656) FROM RESOURCE CONSERVATION AND
RECOVERY ACT SUBTITLE C TO SUBTITLE I AUTHORITY CNC

9/4/1996

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

CERTIFIED MAIL
Return Receipt Requested

September 4, 1996

LCDR Paul Rose
Officer in Charge, Caretaker Site Office
Naval Facilities Engineering Command, Southern Division
Building NH-45
Charleston Naval Base
Charleston, South Carolina 29408-2020

RE: Transferring sites from the RCRA Subtitle C
to the RCRA Subtitle I Authority
Charleston Naval Shipyard
SCO 170 022 560

Dear LCDR Rose:

The Department is in receipt of your letter dated July 26, 1996 requesting to transfer SWMU 178 and AOC 656 from the RCRA Subtitle C to the RCRA Subtitle I authority. Information packages of both sites were included for review by the Department.

Based on the review of current available information of SWMU 178 and AOC 656 the Charleston Naval Base has shown that the petroleum contamination present at these two sites are most likely related to releases from tanks adjacent to these sites. Therefore this Section concurs with the CNB recommendation to investigate SWMU 178 and AOC 656 under the Department's Underground Storage Tank Program; further investigation at these sites should be coordinated with Mr. Paul Bristol of the Department's Groundwater Protection Division.

The transfer of SWMU 178 and AOC 656 from the RCRA Subtitle C to the RCRA Subtitle I authority, will require a permit modification by creating a new Appendix entitled *List of Solid Waste Management Units and Areas of Concern which require investigation and will be regulated under the Department's RCRA Subtitle I Authority*. This new Appendix will list SWMU 178 and AOC 656. Additional modifications to the current RCRA/HSWA Permit are outlined in the attached internal memo (dated February 16, 1996) from the Hazardous Waste Permitting Section of this Department. Compliance with RCRA Subtitle I (i.e. GWPD requirements) will negate the need for further investigation of the two above mentioned sites under the Permit.

Should the Charleston Naval Base (CNB) wish to proceed with this Permit modification, then a formal request must be submitted to the Department in writing. If you have any questions concerning this matter please contact me at (803) 896-4179.

Sincerely,



Johnny Tapia, Environmental Engineer Associate
Hazardous Waste Permitting Section
Bureau of Solid and Hazardous Waste Management

attachments

cc: Paul Bergstrand, Hydrogeology
Paul Bristol, GWPD
Doyle Brittain, USEPA - Region IV
Tony Hunt, SOUTHDIVFACENGNCOM
Brian Stockmaster, SOUTHDIVFACENGNCOM
Rich Richter, Trident EQC