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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS FOR UNDERGROUND STORAGE TANK
MONITORING REPORT BUILDING NH-46 ZONE C AND AREA OF CONCERN 727
NOVEMBER 2011 SAMPLING CNC CHARLESTON
6/25/2013
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

June 25, 2013

David Criswell, P.E.
BRAC PMO SE
4130 Faber Place Drive
Suite 202
N. Charleston, SC 29405

RE: Comments to

- *UST Monitoring Report Building NH-46 Zone C November 2011 Sampling Results Rev 0*
- *UST Monitoring Report for AOC 727 Building NH 46*

Charleston Naval Complex (CNC)
SC0 170 022 560

Dear Mr. Criswell:

The Department of Defense Corrective Action Section of the South Carolina Department of Health and Environmental Control (Department) received the above referenced documents on May 30, 2012 and April 1, 2013, respectively. The Department reviewed the documents and provides the following hydrogeology comment. The comment can be responded to in the next annual monitoring report.

If you have any questions regarding this issue, please contact me at (803) 896-4218.

Sincerely,

Meredith Amick, P.E., Environmental Engineer
DOD Corrective Action Section
Division of Waste Management
Bureau of Land and Waste Management

cc: Annie Gerry, Hydrogeology
Christine Sanford-Coker, EQC Region 7, Charleston

Gary Foster, CH2MHill
Lawson Anderson, Tetra Tech



Catherine B. Templeton, Director

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MEMORANDUM

TO: Meredith Amick, P.E.
Department of Defense Corrective Action Section
Division of Waste Management
Bureau of Land and Waste Management

FROM: Annie M. Gerry, Hydrogeologist 
Department of Defense Corrective Action Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: June 20, 2013

RE: Charleston Naval Complex
SC0 170 022 560

Review of **UST Monitoring Report for Building NH-46, Zone C, November 2011 Sampling Results Revision 0**, Charleston Naval Complex, North Charleston, SC dated May 2012

Review of **UST Monitoring Report for Building NH-46, Zone C, November 2012 Sampling Results Revision 0**, Charleston Naval Complex, North Charleston, SC dated April 2013

The documents referenced above have been reviewed with respect to the S.C. Pollution Control Act 48-1-10 and the Resource Conservation Recovery Act (RCRA), and other appropriate guidance documents. Building NH-46 is a former underground storage tank (UST) system, encompassing four different on site USTs, that supplied fuel oil to boilers at Building NH-46 beginning in 1941. The length of time that the USTs were used and the dates of abandonment for each tank are unknown. In April 2012, an injection of amendment (ORC-Advanced) was implemented to reduce concentrations of naphthalene, which is the only contaminant of concern (COC) at this site.

Based on review of these documents, the following comment has been generated.

COMMENT

1. Based on the review of the data from the most recent sampling event from monitoring well U30GW010, an injection of ORC-Advanced might be beneficial since the concentration of naphthalene has rebounded from below detection limits (BDL) in 2011 to 328 part per billion (ppb) in 2012. The increase in concentration detected in this well has been noted over several sampling events. Therefore an injection event may be beneficial.

If you have any questions regarding this memo, please contact me via email at GerryAM@dhec.sc.gov or by phone at (803) 898-0359.