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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS TO UNDERGROUND STORAGE TANK
MONITORING FOR FUEL DISTRIBUTION SYSTEM 22 ZONE G NOVEMBER 2012
SAMPLING CNC CHARLESTON SC

8/20/2013

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

August 20, 2013

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

RE: Comments to
 o *UST Monitoring for Fuel Distribution System 22, Zone G, November 2012 Sampling Results*
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 document on May 23, 2013. The Department reviewed the document 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, Engineering Associate
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: August 14, 2013

RE: Charleston Naval Complex
SC0 170 022 560

Review of UST Monitoring Report for Fuel Distribution System 22, Zone G, November 2012 Sampling Results, Charleston Naval Complex, North Charleston, SC dated May 2013

The document referenced above has 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. The Fuel Distribution System (FDS) 22 is located next to Area of Concern (AOC) 633 and groundwater is being impacted by petroleum-based dissolved-phase hydrocarbons caused by a leak in the FDS, which distributed fuel to different parts of the Base.

Based on review of the document, the following comments have been generated:

COMMENTS

1. **Page 3-1, Section 3.0 Previous Investigations-** The text reads, "*The hydrocarbon contamination in the vicinity of well 633GW004 is being addressed under the SCDHEC Underground Storage Tank (UST) program.*" Please rewrite this sentence to say that the contamination is being addressed under the SCDHEC Resource Conservation and Recovery Act (RCRA) program.

2. **Chart1-Naphthalene in Well 633GW004-** While this chart shows that the trend for naphthalene is downward, the Navy should consider a remedial action (i.e. injection of an amendment) in order to expedite the degradation of naphthalene in a more timely manner since the latest sampling event showed concentration at 400 part per billion (ppb), and the Risk-Based Screening Level (RBSL) is 25 ppb.
3. **Section 6.0 Conclusions, Page 6-1-** This section recommends continuation of annual groundwater monitoring of well 633GW004 since data from previous investigations indicate contamination is localized in the vicinity of 633GW004. The next sampling event is proposed for November 2013.

The Department agrees with the above listed recommendation.

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