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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL REVIEW AND COMMENTS ON SAMPLING AND ANALYSIS
PLAN FOR AREA OF CONCERN 523 CNC CHARLESTON SC
09/05/2014
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

September 5, 2014

David Criswell, P.E.
BRAC PMO SE
203 S. Davis Drive
Building 247
Joint Base Charleston, SC 29404

RE: Comments to AOC 523 SAP
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 July 30, 2014. The Department reviewed the document with respect to the CNC RCRA Hazardous Waste Permit. Based on the review the Department has comments to the document.

If you have any questions regarding this issue, please contact me at (803) 898-0368.

Sincerely,

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

cc: Christine Sanford-Coker, EQC Region 7, Charleston

Engineering Comments
September 3, 2014
Meredith Amick

1. The CMS Work Plan for AOC 523 proposed a geophysical survey to identify any tanks remaining at the site. This work plan does not propose a geophysical survey. Please discuss the discrepancy.
2. Please ensure that the lab utilized for sample analysis is certified in the state of South Carolina.
3. The Department feels that surface samples would not be representative of site conditions or the conceptual site model for AOC 523 due to site preparations for Building 198 disturbing the historical surface soil.
4. Page 10-9
Based on the Conceptual Site Model and site use as a gas station, the Department typically requires investigation for BTEX, Napthalene, MTBE, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Chrysene, Dibenz(a,h)anthracene, and metals.
5. Worksheet 11
At this time the Department does not feel there is sufficient evidence to support using the TDS argument for groundwater screening. According to the South Carolina R.61-68 Water Classifications and Standards, "Underground source of drinking water (USDW) means an aquifer or its portion:... Which contains a sufficient quantity of ground water to supply a public water system or individual residential well; and ...contains water with less than ten thousand milligrams per liter total dissolved solids." The Department does however support the use of the team developed groundwater background values for screening.
6. Page WS 11-3
MCLs should be retained as relevant and appropriate screening criteria for groundwater analytical data generated as part of the data gap investigation, in addition to EPA Tapwater RSLs.
7. Page WS 11-3
The Department reviewed this document as a CMS Work Plan Addendum and believes that the Data Gap Investigation Report can be combined with the CMS Report in one document. If results indicate additional work is necessary, please submit a new CMS WP Addendum.
8. Page WS 14-1
The well permit application should be submitted to the DOD Corrective Action Section.
9. Page WS 15-1
The reference limits for groundwater should include CNC background values for inorganics written by CH2MHill in 2001. This data set supersedes the EnSafe 1997 background study.
10. Page WS 15-1
The reference limits should include Railroad Track Background Values for PAHs, Arsenic, and Copper for Surface Soils written by CH2MHill in 2001.
11. Appendix D
The arrow on the "Map of US Naval Base Charleston Naval Base, SC Showing Conditions on June 30, 1950" appears to point to the wrong area.
12. Appendix D Last Map
Please explain why the document discusses 2 tanks removed that were associated with AOC 523; however, this map labels "4 existing underground tanks to be removed" in the area of AOC 523.