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CNC CHARLESTON
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CORRECTIVE ACTION PLAN FOR ZONE K BUILDING 2513 ABOVE GROUND STORAGE
TANK 2513-C (AST 2513-C) CNC CHARLESTON SC
01/08/2001
CH2M HILL



26 January 2001

2600 Bull Street
Columbia, SC 29201-1708

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DEPARTMENT OF THE NAVY
SOUTHERN DIVISION NAVAL FEC
GABRIEL MAGWOOD
2155 EAGLE DRIVE
N. CHARLESTON SC 29406

RE: Charleston Naval Complex - Zone K / Building 2513 (AST 2513-C)
Site Identification # 00952
Corrective Action Plan (CAP) received 26 January 2001
Charleston County

Dear Mr. Magwood:

The Department has completed technical review of the referenced document. As submitted, the Corrective Action Plan (CAP) provides an outline of corrective action activities designed to remediate hydrocarbon contamination (if present) at the referenced facility.

Per the referenced document, samples from SPORT0302-1 and 0302-2 were reported as BDL with elevated detection limits due to matrix interference. Per previous DHEC correspondence (Bristol to Amey, 2 September 1997) when detection limits are elevated and CoC's are reported as zero or BDL it will be assumed that the chemical constituent is equal to the elevated detection limit. Per the CAP, additional sampling will be performed in the area of SPORT0302-1, 0302-2 and 0302-3 to determine if hydrocarbon contamination is present in excess of established RBSL's and MCL's. If contamination is identified, it is proposed that the area of concern be excavated to eliminate soil contamination.

The request to perform additional sampling is approved for immediate implementation. The request to initiate excavation activities, should contamination be identified, is approved. However, should excavation activities be warranted the Department must be provided a work plan identifying the extent of the excavation and outlining procedures for waste management prior to initiation of excavation activities.

Please provide the Department with a schedule for corrective action implementation at this site. Once corrective action is initiated, the Department should receive reports as described in the CAP. Should you have any questions please contact me at 803-898-3553 (office phone), 803-898-3795 (fax) or by e-mail bishopma@columb32.dhec.state.sc.us.

Sincerely,

Michael A. Bishop, Hydrogeologist
Groundwater Quality Section
Bureau of Water

cc: Trident District EQC
Mihir Mehta, SCHDEC-BLWM
✓ Technical File



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Columbia, SC 29201-1708

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Sincerely,

Michael A. Bishop, Hydrogeologist
Groundwater Quality Section
Bureau of Water

cc: Trident District EQC
Mihir Mehta, SCHDEC-BLWM
Technical File

RECEIVED

JAN 26 2001

Bureau of Underground
Storage Tank Management

**CORRECTIVE ACTION PLAN
FOR
ZONE K/ BUILDING 2513
(Aboveground Storage Tank 2513-C)**

SITE IDENTIFICATION # 09952

**Charleston Naval Complex
Charleston, South Carolina**

**Submitted to:
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
Charleston, South Carolina 29406**

**Submitted by:
CH2M-JONES, LLC.
115 Perimeter Center Place NE
Suite 700
Atlanta, Georgia 30346-1278**



Contract Number: N62467-99-C-0960

8 January 2001

PREPARED BY:

BR. C 1-15-01
**Brian R. Crawford
Engineer II
CH2M-JONES, LLC.**

APPROVED BY:

J. A. Heames 1-20-01
**Jed A. Heames
Site Superintendent
CH2M-JONES, LLC.**

CERTIFICATION

I certify that the information contained in this report is true, and complete to the best of my knowledge, information, and belief.

Approved By: R. Govea 9/23/81 /J.A. Jones

South Carolina Registration No. 14220

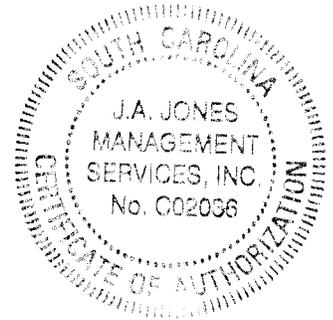


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8.0

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TABLE 1.....SOIL CONCENTRATION LEVELS

ACRONYMS

AST	Aboveground Storage Tank
bls	below land surface
CAP	Corrective Action Plan
CNC	Charleston Naval Complex
COC	Chemical of Concern
DRO	Diesel Range Organics
EISOPQAM	Environmental Investigations Standard Operating Procedures and Quality Assurance Manual
EPA	Environmental Protection Agency
mg/kg	microgram per kilogram
mg/L	microgram per liter
OVA	Organic Vapor Analyzer
QA	Quality Assurance
QC	Quality Control
RBSL	Risk-Based Screening Level
RDA	Redevelopment Authority
SCDHEC	South Carolina Department of Health and Environmental Control
SOUTHDIV	Southern Division Naval Facilities Engineering Command
SSTL	Site-Specific Target Level
TTNUS	Tetra Tech NUS

1.0 INTRODUCTION

This Corrective Action Plan (CAP) has been prepared by CH2M-JONES, LLC. The plan is designed for Zone K/ Building 2513 (Aboveground Storage Tank [AST] 2513-C); located at the Charleston Naval Complex (CNC) former Annex, Charleston, South Carolina.

The South Carolina Department of Health and Environmental Control (SCDHEC) has designated this site as Identification Number: 00952. This CAP provides methods for corrective actions first through re-sampling and secondly through excavation. Initially the site will be re-sampled and delineated. If the samples indicate that there is no contaminates of concern (COCs), CH2M-Jones will recommend a no further action for this site. If the sample analysis does not provide evidence for no further action, then active remediation will be implemented by removing contaminated soils around the former AST 2513-C. Monitoring well abandonment in accordance with SCDHEC Corrective Action Guidance, June 1997 will also be a part of the corrective actions at this site.

1.1 General Site Description

The CNC is located in the city of North Charleston, on the west bank of the Cooper River in Charleston County, South Carolina. This installation consists of two major areas: an undeveloped dredge materials area on the east bank of the Cooper River on Daniel Island in Berkley County, and a developed area on the west bank of the Cooper River. The developed portion of the base is on the peninsula bounded on the west by the Ashley River and on the east by the Cooper River. The site is located within the developed portion of the base.

The area surrounding CNC is "mature urban", having long been developed with commercial, industrial, and residential land use. Commercial areas are primarily west of CNC; industrial areas are primarily to the north of the base along Shipyard Creek.

On February 05, 1997 the Environmental Detachment Charleston completed an AST Assessment Report for Building 2513 (AST 2513-C). AST 2513-C was used to provide heating oil to Building 2513. During the AST closure, the underground piping was removed up to the concrete pad on the west side of the building and permanently capped.

1.2 Objective

This CAP presents a plan to resample the soil at AST 2513-C. The Assessment Report completed by the Environmental Department Charleston found that levels of Volatile Organic Compounds (VOCs) were detected in discrete soil samples obtained during closure activities. The reported values for naphthalene appear to exceed levels proposed in the Soil Corrective Action Plan, amended July 30, 1997. As noted in the South Carolina Department of Health and Environmental Control (SCDHEC) letter, further samples SPORT0302-1 and 0302-3 were reported as BDL (below detection limits) with elevated detection limits due to matrix interference. The letter also states that when detection limits are elevated and COCs are reported as zero or Below Detection Limits (BDL) it will be assumed that the chemical

constituent is equal to the elevated detection limit. With this in consideration, the limits for the samples were greater than the Risk Based Screening Levels (RBSLs).

Because the samples analytical had matrix interference, (refer to SCDHEC letter dated 22 October 1997), CH2M-Jones, LLC will resample at SPORT0302-1, 0302-2 and 0302-3 in effort to have a more representative sample. In the event that the analytical results from the resample indicate that levels of COCs are above RBSLs, active measures will be taken.

2.0 PROPOSED SAMPLING SCHEDULE

The Assessment Report indicated that although sample results for AST 2513-C were reported as Below Detection Limits (BDL), the detection limits for sample SPORT0302-1 and 0302-3 were elevated due to matrix interference. Because the results had a dilution factor of 100, the detection limits were elevated, which indicates that the results are above the RBSLs. CH2M-Jones, LLC will resample soils at AST 2513-C at all previous sample locations as measures for the sampling schedule. If the analytical from the certified laboratory indicates that the soils at site 2513-C are below the RBSLs, CH2M-Jones will ask for a No Further Action (NFA). If concentrations are above the RBSLs active remediation will be implemented (see Section 3.0 of this plan).

2.1 Surveying

No new monitoring wells are scheduled to be installed as a part of the sampling in this section. Surveying of any new well locations will be conducted if warranted.

All new soil boring locations will be surveyed as a part of this plan.

2.2 Soil Boring Schedule

The sampling schedule includes re-sampling the previous sample locations. Each soil boring collected will be screened in the field using a PID (Photo Ionization Detector). The samples will be collected in two-foot intervals; the interval with the highest reading from each boring will be collected and analyzed by a certified laboratory. If those results are greater than the RBSLs, then additional sampling mentioned in the active remediation will be implemented (see Section 4.0).

2.3 Monitoring Well Abandonment

All monitoring wells will be abandoned upon receiving approval by SCDHEC. The wells will be abandoned following the South Carolina Well Standards and Regulations R.61-71. The well abandonment will include grouting wells, removing stick-ups and removing all guard posts. Any well casing and screen removed will be decontaminated and disposed of as general refuse.

2.4 Sampling and Analysis Plan

One round of sampling will be collected at the site. The analytic results should indicate whether this site should be recommended as no further action or resume to active measures described in Section 3.0. Each soil boring collected will be screened in the field using a PID (Photo Ionization Detector). Samples will be collected at two-foot intervals starting at ground level and stopping before penetrating ground water. All intervals collected will be screened in the field using a Photo Ionization Detector (PID) prior to submitting samples to the certified laboratory.

Each interval will be collected and sent to a certified laboratory to be analyzed for the following: BTEX using method 8260, Naphthalene using method 8260 and PAHs using method 8270.

All sampling procedures will be conducted in accordance with EPA EISOPQAM, and Ensafe/Allen & Hoshall, Comprehensive Sampling and Analysis Plan, 1996.

2.5 Reporting

A report will be submitted to SCDHEC following each sampling event. The reports will summarize and include copies of field and laboratory analytical data. Upon completion of the initial sampling, a Performance Evaluation Report will also be submitted to SCDHEC to summarize the sampling activities, evaluate the soil data, and provide recommendations for the site.

3.0 PROPOSED CORRECTIVE ACTION

The corrective actions recommended in this section will be implemented only if the sampling schedule (see Section 2.0) shows evidence that the soils at AST 2513-C are contaminated.

The proposed corrective action for this site is first to resample the soils in the area in order to delineate the contamination if any and excavate the soils in the contaminated area. Samples will be collected in a circular pattern approximately ten (10) feet north, south, east, and west of the samples collected in the sampling schedule in Section 2.0. Samples will be collected in two (2) foot intervals and screened in the field using a PID. Intervals will start at ground level and stop prior to reaching groundwater. For each boring, only those intervals with the highest readings using the PID will be collected and sent to a certified laboratory. Samples collected will be analyzed for BTEX and Naphthalene using method 8260 and PAH using method 8270. If the site contains levels of any COCs above the RBSLs then soil removal will be considered as a corrective action. However, if COCs are below the RBSLs, intrinsic remediation or No Further Action will be recommended for the site.

3.1 Soil Remediation

If the first round of sampling described in Section 2.0 indicates levels of COCs above RBSLs, CH2M-Jones, LLC plans on implementing excavation (soil removal) following the delineation at this site in order to remove contaminants from the soil. All past soil samples indicate levels of COCs above RBSLs due to matrix interference, which, will be used as the source area when delineating the area.

3.2 Groundwater Remediation

Field screening and analytical results of groundwater sampling in the assessment completed by the Environmental Detachment Charleston indicated that there are no contaminants in the groundwater at AST 2524-A or AST 2524-B the presence of groundwater contamination (SPORTENVDETCHASN 17 January 1997).

4.0 PROPOSED ACTIVE REMEDIATION

Based on the results of the assessment for AST 2513-C, a dig and haul approach will be performed at this site to remove the COCs if any are found. Because no contaminants have been detected in groundwater sampling, no additional groundwater sampling will be conducted at this time. Additional soil samples will be collected prior to excavation in order to establish the contaminated area. After defining the clean boundaries, soils from approximately 2 to 8 ft bls at the former AST pit will be excavated.

4.1 Soil Removal

The objective of this remediation effort is to remove all contaminated soils from the area. Several soil samples will be collected in two (2) foot intervals starting at surface level until reaching soils just above the water table (approximately six to eight feet). The samples will be screened in the field using a hand held air monitor/ Photo Ionization Detector (PID) in order to delineate the contamination in the field prior to excavation. Each interval that contains the highest reading (above 50 parts per billion) using the PID will also be collected and sent to be analyzed by a certified laboratory.

If the COCs are below the RBSLs after sampling, a NFA should be warranted for this site. As stated in the SCDHEC correspondence letter dated 22 October 1997, matrix interference was a factor in the first round of sampling. If the COCs are above the RBSLs after sampling, then CH2M-Jones, LLC will proceed with the excavation upon approval.

4.2 Monitoring Well Installation

No additional permanent monitoring wells are scheduled to be installed at site 2513.

If any wells are unusable or new wells are warranted for any other reason, the wells will be installed to the same specification as existing monitoring wells unless site conditions change and warrant otherwise. The wells will be installed in accordance with South Carolina Well Standards and Regulations R.61-71. A utility locate will be completed prior to any well installation activities. Any necessary permits will be acquired prior to well installation activities.

4.3 Surveying

Surveying of any new well locations will be conducted as a part of this CAP, if warranted. All new soil borings collected will be surveyed as well.

4.4 Soil Boring Schedule

As a part of the intrinsic remediation, soil borings will be taken and collected around the former sample locations in order to delineate the contaminated area (see Section 2.0).

4.5 System Operation and Maintenance

Other than the sampling events, no additional system operation and maintenance will be needed at this site.

4.6 Sampling and Analysis Plan

Soil samples will be collected prior to any excavation. A total number of samples collected at the site will be determined onsite at the time of field screening. If field screening indicates that there is no contamination in soils, a minimum number of four soil samples will be collected and submitted to a certified laboratory for petroleum chemicals of concern as listed in Section IV of the *Underground Storage Assessment Guidelines for Permanent Closure and Change in Service*, SCDHEC; July, 1998.

All sampling procedures will be conducted in accordance with EPA Environmental Investigations Standard Operating Procedures and Quality Assurance Manual (EISOPQAM), 1996, and Ensafe/ Allen & Hoshall, Comprehensive Sampling and Analysis Plan, 1996.

4.7 Reporting

Reports will be submitted to SCDHEC following the sampling events. The reports will summarize and include copies of field and laboratory analytical data. Upon completion of active remediation, a Performance Evaluation Report will also be submitted to SCDHEC to summarize the remediation activities, evaluate the soil quality data, and provide recommendations for the site.

4.8 Equipment Decontamination

All drilling equipment, augers, well casing and screens, and soil and groundwater sampling equipment involved in field sampling activities will be decontaminated according to the EPA EISOPQAM.

4.9 Sample Handling

Sample handling will be conducted in accordance to the following references: EPA EISOPQAM, Code of Federal Regulations 136, 1990, and EPA Users Guide to Contract Laboratory Program, 1988. The following forms will be completed for packing/shipping process: sample labels, chain-of-custody labels, appropriate labels applied to shipping coolers, and chain-of-custody forms.

4.10 Quality Control

In addition to periodic calibration of field equipment and the completions of the appropriate documentation, quality control (QC) samples will be collected during sampling events. QC samples may include field blanks, field duplicates, and trip blanks. Definitions of each can be found below as described by the EPA EISOPQAM:

- **Field Blank:** A sample collected using organic-free water, which has been run over/through sample collection equipment. These samples are used to determine if contaminants have been introduced by contact of the sample medium with sampling equipment. Equipment field blanks are often associated with collecting rinse blanks of equipment that has been field cleaned.
- **Field Duplicates:** Two or more samples collected from a common source. The purpose of a duplicate sample is to estimate the variability of a given characteristic or contamination associated with a population.
- **Trip Blank:** A sample, which is prepared prior to the sampling event in the actual container and is stored with the investigative samples throughout the sampling event. They are often packaged for shipment with the other samples and submitted for analysis. At no time after their preparation are trip blanks to be opened before they reach the laboratory. Trip blanks are used to determine if samples were contaminated during storage and/or transportation back to the laboratory (a measure of sample handling variability resulting in positive bias in contaminant concentration). If samples are to be shipped, trip blanks are to be provided with each shipment but not for each cooler.

4.11 Field Quality Assurance / Quality Control (QA/QC)

All sampling procedures will be conducted in accordance with EPA EISOPQAM. More information on field QC can be found in Sections 4.8 through 4.10.

QA/QC specifications for selected field measurements are summarized below.

Analysis	Control Parameter	Control Limit	Corrective Action
Air Monitoring	Check Calibration of OVA daily	Calibrate to manufactures specifications	Recalibrate. If unable to calibrate, replace.
pH of water	Continuing calibration check of pH 7.0 buffer	pH = 7.0	Recalibrate. If unable to calibrate, replace electrode.
Specific Conductance of water	Continuing calibration check of standard solution	> 1% of standard	Recalibrate.

4.12 Record keeping

In addition to required sampling documentation (see Section 4.9), standardized forms, log sheets and logbooks will be completed during all field activities.

5.0 SITE MANAGEMENT AND BASE SUPPORT

Throughout the investigation activities, work on the CNC will be coordinated through SOUTHDIV and SCDHEC.

The primary contacts for each are as follows:

1. SOUTHDIV point of contact
Gabe Magwood
Southern Division Engineering Command
2155 Eagle Drive
North Charleston, SC 29406
(843) 820-7307

2. SOUTHDIV point of contact
Tony Hunt
Southern Division Engineering Command
2155 Eagle Drive
North Charleston, SC 29406
(843) 820-5525

3. SCDHEC point of contact
Michael Bishop
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, SC 29201
(843) 898-4339

6.0 REFERENCES

Environmental Detachment Charleston. 1997. Assessment Report for AST 2513-C

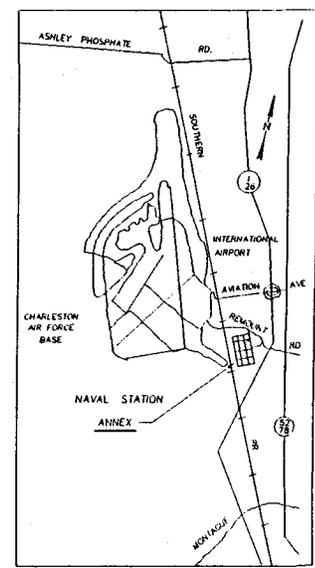
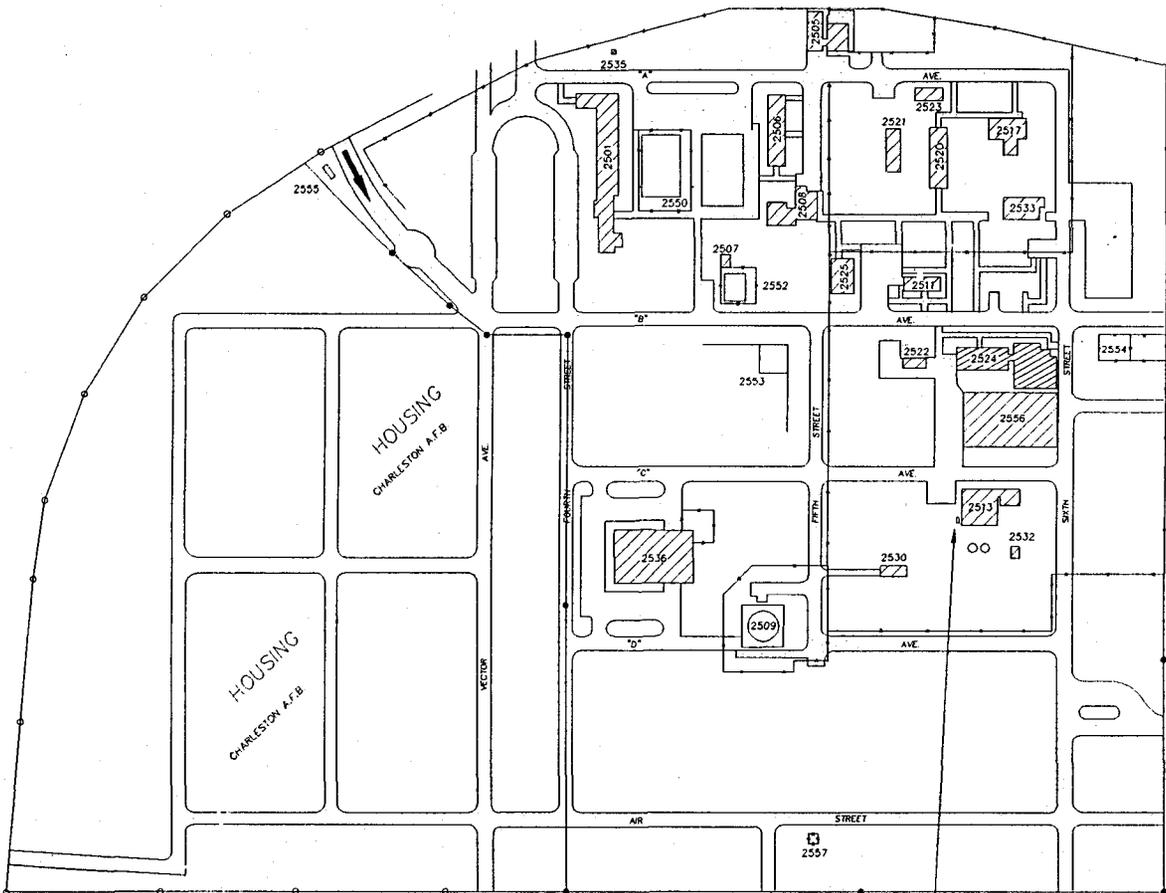
South Carolina Department of Health and Environmental Control. 1997. Corrective Action Guidance.

United States Environmental Protection Agency. 1990. Code of Federal Regulations 136.

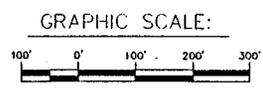
United States Environmental Protection Agency. 1988. EPA Users Guide to Contract Laboratory Program.

United States Environmental Protection Agency. 1996. EPA Environmental Investigations Standard Operating Procedures for Quality Assurance Manual.

FIGURE 1



LOCATION MAP
N.T.S.



- LEGEND:
- BLDG OR STRUCTURE
 - ROADS, WALKS OR PAVED AREAS
 - PROPERTY BOUNDARY
 - PROPERTY BOUNDARY (BY OTHERS)
 - SECURITY FENCE

FORMER AST
2513C

SPORTENVDETHASN
1899 North Hobson Ave.
North Charleston, SC
29405-2106
Ph. (803) 743-6777

Site Map 1
AST 2513C
Naval Station Annex
Charleston, SC

DWG DATE: 14 APR 97 DWG NAME: R2513C_1

FIGURE 2

"C" AVE.

ELECTRICAL SUBSTATION



DRAINAGE DITCH

OE

SM

REMOTE FILL FOR
ASTs 2513A & B

2513

FORMER AST 2513C

CONCRETE SLABS

SM

SM

SD

GRASS

SD

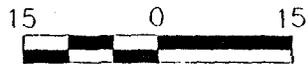
FORMER ASTs 2513A & 2513B

2532

LEGEND

- E - ELECTRICAL MANHOLE
- SD - STORM DRAIN
- SM - SEWER MANHOLE

EARTHEN BERM, 3' HIGH



GRAPHIC SCALE

SPORTENVDETHASN
 1899 North Hobson Ave.
 North Charleston, SC
 29405-2106
 Ph. (803) 743-6777

Site Map 2
 AST 2513C
 Naval Station Annex
 Charleston, SC

DWG DATE: 15 APR 97 | DWG NAME: R2513C_2

FIGURE 3



FORMER AST 2513C

SPORT 0302-1
(MOIST BROWN SANDY SOIL, MILD
PETRO ODOR, OVA 17 ppm)

DRAIN VALVE

FILL

VENT

UNDERGROUND PIPE RUIN

SUPPLY

SPORT 0302-2
(MOIST BROWN SOIL, OVA 0 ppm)

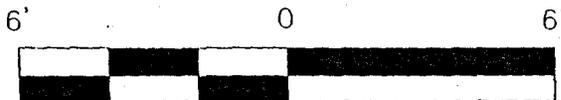
SPORT 0302-3
(MOIST BROWN SOIL, MILD
PETRO ODOR, OVA 126 ppm)

CUT AND CAPPED

BLDG
2513

CONCRETE SLABS

NOTE:
ALL SAMPLES WERE SOIL SAMPLES



GRAPHIC SCALE

SPORTENVDETCNASN
1899 North Hobson Ave.
North Charleston, SC
29405-2106
Ph. (803) 743-6777

Site Map 3
AST 2513C
Naval Station Annex
Charleston, SC

DWG DATE: 15 APR 97

DWG NAME: R2513C_3

TABLES

SOIL CONCENTRATION LEVELS 2513-C (mg/kg)

COC	RBSL	SPORT0302-1	SPORT0302-2	SPORT0302-3	SPORT0301-4	SPORT0301-5
Benzene	0.005	ND	ND	100*	ND	ND
Toluene	1.622	ND	ND	100*	ND	ND
Ethylbenzene	1.260	ND	ND	100*	ND	ND
Xylenes	42.471	ND	ND	100*	ND	ND
Naphthalene	0.210	ND	ND	0.5160	ND	ND
PAHs (chrysene)	12.998	16.6**	ND	16.2**	ND	ND

- *Detection Limit = 100 mg/kg.
- ** Detection limits based on elevated dilution factors