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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL REVIEW OF FINAL ASSESSMENT REPORT DATED 20
JANUARY 2000 ZONE F SITE 21 BUILDING 241 LETTER (BRISTOL TO MAGWOOD) CNC
CHARLESTON SC
02/23/2000
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



23 February 2000

2600 Bull Street
Columbia, SC 29201-1708

COMMISSIONER:
Douglas E. Bryant

Department of the Navy
Southern Division NFEC
P.O. Box 190010
North Charleston, SC 29419-9010
Attention: Mr. Gabriel Magwood

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Re: Final Assessment Report dated 20 January 2000
Zone F/Site 21-Building 241 (Site Identification # 17706)
Charleston Naval Complex/Charleston Naval Base
Charleston, SC
Charleston County

Dear Mr. Magwood:

The author has completed technical review of the referenced document. As submitted, the report provides a narrative and summary of previous assessment activities and analytical results from additional sampling conducted to establish the environmental fate of suspected contamination at the subject property. Analytical results provided indicate that concentrations of PAH and VOC compound(s) were reported in soil and groundwater samples obtained at the subject site. The reported concentrations exceed the RBSL (Risk-Based Screening Levels, SCDHEC *Risk-Based Corrective Action for Petroleum Releases*, 5 January 1998), proposed RBC (Risk-Based Concentrations for Residential Soils, EPA Region III Risk-Based Concentrations Table, 12 April 1999) and established groundwater MCLs (maximum contaminant levels) and/or established health advisories. Available analytical data and applied interpretations appear to indicate that a reasonable delineation and characterization of the extent and severity of soil and groundwater contamination have been developed for the Building 241 site. This information and data were then utilized to develop SSTL (site specific target levels) for CoC (contaminants of concern) in evidential discussion(s) for consideration of employing intrinsic remediation at the subject site.

Although the author concurs that active remediation may not be appropriate for this site, reasonable monitoring must be established to demonstrate reclamation of groundwater quality through time. Proposals that incorporate monitored natural attenuation must provide sufficient data to demonstrate the groundwater environment's assimilative capacity to provide for intrinsic biodegradation/natural attenuation for the known contaminants through time. Appropriate and reasonable data must be available/developed to demonstrate contaminant plume stability, contaminant stoichiometry and provide site specific information/data on attenuation (retardation and degradation) rates to verify predictive modeling applied to the site. Associated routine monitoring (groundwater and soil, as necessary) should be sufficient to

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TETRA TECH NUS, INC.

1311 Executive Center Drive, Ellis Building. ■ Suite 220 ■ Tallahassee, FL 32031
(850) 656-5458 ■ FAX (850) 656-7403 ■ www.tetrattech.com

TTNUS/TAL-99-023/0219/3.2

31 March, 1999

Project Number 0219

Mr. Paul Bristol
South Carolina Department of Health and Environmental Control
Groundwater Quality Section
Bureau of Water
2600 Bull Street
Columbia, South Carolina 29201-1708

Reference: Clean Contract No. N62467-94-D0888
Contract Task Order No. 0097

Subject: Site Assessment Plan for
Charleston Naval Complex - Zone F
Charleston, South Carolina

Dear Mr. Bristol:

On behalf of the Department of the Navy, Southern Division, Naval Facilities Engineering Command, Tetra Tech NUS, Inc. is pleased to submit for your review and approval, the Site Assessment Plan for the referenced zone at the Charleston Naval Complex.

If you have any questions regarding this plan or require further information, please contact me at (850) 656-5458.

Very truly yours,

Paul E. Calligan, P.G.
Task Order Manager

/pc

Enclosures (1)

- c: Mr. Gabriel Magwood, SOUTHDIV
- Ms. D. Wroblewski, TtNUS (w/o enclosure)
- Ms. R. Baur, TtNUS (w/o enclosure)
- Mr. A. Kendrick/File

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Water Monitoring, Assessment &
Protection Division