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CNC CHARLESTON
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RESPONSE TO COMMENTS ON THE GROUNDWATER ASSESSMENT DATA FOR
BUILDING NS-2 CNC CHARLESTON SC

01/31/2003
CH2M HILL

CH2M-Jones, LLC.

31 January 2003

SCDHEC
Michael Bishop
Groundwater Quality Section/ Bureau of Water
2600 Bull Street
Columbia, SC 29201

Re: UST Site NS-2 (17595)
SCDHEC letter dated 24 January 2003

Mr. Bishop:

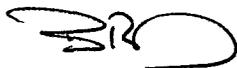
The letter received on 24 January 2003 addressing the referenced site, states that concentrations of metals in groundwater are above the established Risk-Based Screening Levels (RBSLs) and MCLs. As stated in the letter, groundwater samples were analyzed for total metals (unfiltered) and dissolved metals (filtered with 0.45 micron filter). Although unfiltered samples indicated metals concentrations above the RBSL limits, the filtered results shows that the metals concentrations below the RBSL limits.

South Carolina Regulation R-61-68 requires groundwater samples be collected in order to permit a realistic appraisal of quality. It is generally understood that unfiltered Geoprobe groundwater samples contain significant levels of turbidity, which is composed of inorganics. It is for this reason that the use of filter Geoprobe samples are used to make realistic appraisal of the groundwater quality in lieu of the unfiltered sample results as noted in EPA's document "*Ground-Water Sampling Guidelines for Superfund and RCRA Project Management*" (page 10). This technique has been employed on several RCRA sites at CNC and CH2M-Jones, LLC feels that this approach should also apply to the UST sites at CNC.

The analytical results from Site NS2 (17595) indicate that there are no Chemicals of Concern (COC's) in soils, and for groundwater the only COCs detected were in the total results. All dissolved results were below the RBSLs.

CH2M-Jones, LLC recommends that the Department evaluate the above information and reconsider UST site NS-2 for No Further Action (NFA) based on the unfiltered analytical data.

Sincerely,



CH2M-Jones, LLC
Brian R. Crawford, REM

Cc: Gabriel Magwood-SOUTHDIV
Gary Foster-CH2M-Jones