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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL REVIEW OF FINAL ASSESSMENT REPORT DATED 30
SEPTEMBER 1999 AND NO FURTHER ACTION (NFA) FOR ZONE H SITE 3 BUILDING 654
CNC CHARLESTON SC
11/12/1999
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



12 November 1999

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 30 September 1999
Zone H/Site 3-Building 654 (Site Identification # 00963)
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 describing previous assessment activities and analytical results from additional sampling conducted to determine the environmental fate of suspected contamination at the subject property. The analytical results provided indicate that reportable concentrations of BTEX and PAH compounds were detected above established method detection limits in soil samples obtained at the subject site. The reported compounds are at a concentration(s) which is at or below the RBSL (Risk-Based Screening Levels, SCDHEC *Risk-Based Corrective Action for Petroleum Releases*, 5 January 1998) and/or proposed RBC (Risk-Based Concentrations for Residential Soils, EPA Region III Risk-Based Concentrations Table, 12 April 1999). Groundwater analytical results indicate PAH compound naphthalene detected at or slightly above established method detection limit for three (3) samples. Based on the analytical results presented and description of site specific geology/hydrogeology, potential releases, if any, from previous activities at the subject site do not appear to present a significant threat to human health and/or the environment at the present time. In this regard, the employed assessment activities and sampling results appear to indicate that no additional endeavors for remedial actions and/or contaminant characterization is warranted for the Building 654 site at this time.

With consideration to the above comments, the Department has reviewed the referenced environmental data. Based on the information and analytical data submitted, the Department recognizes that the Department of the Navy and Charleston Naval Complex has adequately addressed the known environmental contamination identified on the property to date in accordance with the approved scope of work. Please note, this statement pertains only to the portion of the site addressed in the referenced report and does not apply to other areas of the site and/or any other potential regulatory violations. Further, the Department retains the right to request further investigation if deemed necessary.

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

Charleston Naval Complex/Charleston Naval Base

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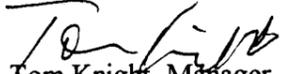
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Please note that an SSTL (site specific target level) was calculated for subsurface soil for benzene leaching to groundwater. The calculated concentration does not appear appropriate and may not be reasonably protective of human health and the environment. The facility is requested to reevaluate the process for establishing SSTL's and appropriate reviews to determine the validity and applicability of the calculated concentrations.

Should you have any questions please contact me at (803) 898-3559.

Sincerely,


Paul L. Bristol, Hydrogeologist
Groundwater Quality Section
Bureau of Water


Tom Knight, Manager
Groundwater Quality Section
Bureau of Water

cc: Trident District EQC