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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL REVIEW OF FINAL ASSESSMENT REPORT DATED 20
JANUARY 2000 FOR ZONE E SITE 26 BUILDING 6 CNC CHARLESTON SC
02/24/2000
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



24 February 2000

2600 Bull Street
Columbia, SC 29201-1708

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North Charleston, SC 29419-9010

William M. Hull, Jr., MD
Vice Chairman

Attention: Mr. Gabriel Magwood

Mark B. Kent
Secretary

Re: Final Assessment Report dated 20 January 2000
Zone E/Site 26-Building 6 (Site Identification # 17626)
Charleston Naval Complex/Charleston Naval Base
Charleston, SC
Charleston County

Howard L. Brilliant, MD

Brian K. Smith

Rodney L. Grandy

Larry R. Chewning, Jr., DMD

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 6 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 active remediation (soils) and intrinsic remediation (groundwater) at the subject site.

Although the author concurs that active remediation may 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 demonstrate the rate and

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effectiveness (if any) of predicted degradation processes in effect and able to distinguish the effects of nondestructive processes (advection, dispersion, sorption, etc.) and destructive attenuation processes.

With consideration to the above, the author concurs with the proposal for corrective actions at the referenced site. The facility should develop an appropriate CAP (corrective action plan), including proposed sampling schedule. A schedule for development of the requested CAP should be submitted to my attention by 31 March 2000. Should you have any questions please contact me at (803) 898-3559.

Sincerely,

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

cc: Trident District EQC