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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL REVIEW OF FINAL ASSESSMENT REPORT DATED 30  
DECEMBER 1999 FOR ZONE G SITE 16 BUILDING 224 CNC CHARLESTON SC  
02/09/2000  
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



9 February 2000

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DEC 12 2000

Bureau of Underground  
Storage Tank Management

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 December 1999  
Zone G/Site 16-Building 224 (Site Identification # 01251)  
Charleston Naval Complex/Charleston Naval Base  
Charleston, SC  
Charleston County

Dear Mr. Magwood:

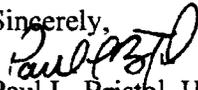
The author has completed technical review of the referenced document. As submitted, the report provides a narrative describing previous assessment activities and analytical results from additional sampling conducted to determine the environmental fate of suspected contamination at the subject property. The analytical results provided indicate that reportable concentrations of BTEX and PAH compounds were detected above established method detection limits in soil and groundwater samples obtained at the subject site. The reported compounds are at a concentration(s) which is at or above 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/or established groundwater MCLs (maximum contaminant levels). Based on the analytical results presented and description of site specific geology/hydrogeology, it appears that a reasonable delineation of soil and groundwater contamination has been developed for the subject site and appropriate remedial action is warranted.

Please be reminded that the Department considers the goal of groundwater corrective actions as the restoration of impacted waters to the quality consistent with the use associated with the described class, unless a mixing zone within the bounds of the property is granted by the Department (R.61-68 Water Classifications and Standards). As groundwaters of the State are currently classified as Class GB (underground sources of drinking water), the appropriate remedial goal for this site will be the quality standards established in R.61-68, if reasonably and technically attainable, utilizing available technology. The Department may consider intrinsic biodegradation/attenuation (natural attenuation) as a reasonable remedial strategy when demonstrated to be a viable and effective mechanism for restoration of groundwater quality.

Charleston Naval Complex/Charleston Naval Base  
9 February 2000  
page 2

The facility must provide appropriate and relevant technical justifications to demonstrate natural biodegradation/attenuation as a reasonable and effective corrective action and demonstrate the groundwater environment's assimilative capacity to provide for natural attenuation for CoC's (contaminants of concern) through time. Appropriate quantitative fate and transport calculations should be incorporated to demonstrate potential current risk (exposure) and potential future risk (exposure) to CoC originating from the site. Appropriate monitoring must be developed to demonstrate the rate and effectiveness of the suspected biodegradation process and demonstrate the validity of the assumptions employed in predictive modeling.

With consideration to the above discussion, the facility must develop and submit a CAP (corrective action plan) for review and approval, as appropriate. Please submit a schedule for completion of the requested CAP 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