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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL REVIEW OF FINAL ASSESSMENT REPORT DATED 18
NOVEMBER 1999 FOR ZONE H SITE 7 BUILDING 653 CNC CHARLESTON SC
01/13/2000
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



13 January 2000

2600 Bull Street
Columbia, SC 29201-1708

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

Re: Final Assessment Report dated 18 November 1999
Zone H/Site 7-Building 653 (Site Identification #00962)
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. The analytical results presented 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 653 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 no further action at the subject site.

The Department considers the goal of groundwater corrective actions as the restoration of impacted waters to a quality consistent with the use associated with the described water class in a reasonable and timely manner. As groundwaters of the State are currently classified as Class GB (underground source of drinking water), the appropriate remedial goal for this site will be the quality standards established in R.61-68 (Water Classifications and Standards), if reasonably and technically attainable, utilizing available technology. Selection of a remedial alternative necessary to attain the above classification must be technically justified and demonstrate appropriate protection of human health and the environment, prevent continued migration of contamination, reduce the mass of contaminants in all affected media and have predictable/measurable parameters sufficient to demonstrate the efficacy of the remedial alternative implemented.

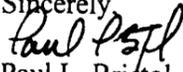
Although the author concurs that active remediation may not be appropriate for this site, reasonable monitoring must be established to demonstrate reclamation of groundwater quality through time. Proposals which incorporate monitored natural attenuation must provide

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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 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 facility should evaluate available data and submit an appropriate CAP (corrective action plan) sufficient to address the identified concerns discussed above. A schedule for development of the requested CAP should be submitted to my attention by 29 February 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