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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL REVIEW OF GROUNDWATER ASSESSMENT REPORT  
RECEIVED 26 JULY 2005 FOR FUEL DISTRIBUTION SYSTEM AREA (FDS) 22 CNC  
CHARLESTON SC  
07/26/2005  
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

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26 July 2005

Commander  
NAVFACENGCOM Southern Division  
Attn: Code ES24 (Gabriel Magwood)  
P.O. Box 190010  
North Charleston, SC 29419-9010

Re: CNB – FDS Area 22  
**Site Identification # 02401**  
Groundwater Assessment Report received 26 July 2005  
Charleston County

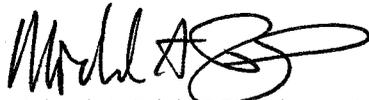
Dear Mr. Magwood:

The Department has completed technical review of the referenced document. Interpretation of the analytical data provided in the referenced report indicates that chemicals of concern remain above established Risk-Based Screening Levels and MCLs.

Per the report, Benzene and Naphthalene exceed their respective MCLs in well 633GW004. The three DPT points installed adjacent to 633GW004 did not detect any hydrocarbons in groundwater. Given these results the contamination appears limited to the immediate vicinity of well 633GW004. However, the reported Naphthalene concentration of 2,180 µg/L is far above the RBSL limit for Naphthalene (25 µg/L). It is likely to be some time before MNA can remediate Naphthalene at this site to the RBSL limit. Given the limited aerial extent of the contamination and relatively shallow groundwater, CNB may wish to consider more proactive measures to deal with the contamination at FDS 22. At this time, the Department does not concur with the request for annual sampling, rather semi-annual sampling of the subject site should be conducted.

Please submit the first semi-annual sampling report to the Department no later than 30 December 2005. Should you have any questions, please contact me at (803) 898-3553 (office phone), (803) 898-2893 (fax) or via e-mail [bishopma@dhec.sc.gov](mailto:bishopma@dhec.sc.gov).

Sincerely,

  
Michael A. Bishop, Hydrogeologist  
Groundwater Quality Section  
Bureau of Water

cc: Trident District EQC  
Jerry Stamps, BLWM  
CH2MHILL, ATTN: Andrew O'Connor, 1330 Kilo Street, North Charleston, SC 29405  
Technical File