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CNC CHARLESTON
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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL REVIEW OF DRAFT ENVIRONMENTAL BASELINE SURVEY
FOR LEASE (EBSL) AND DRAFT FINDING OF SUITABILITY TO LEASE (FOSL) REVISION 0
DATED MAY 2001 FOR FORMER BUILDING 664 CNC CHARLESTON

06/08/2001

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



PROMOTE PROTECT PROSPER

2600 Bull Street
Columbia, SC 29201-1708

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June 8, 2001

CERTIFIED MAIL

Matthew Humphrey
Caretaker Site Office
NAVFACENGCOM, Southern Division
P. O. Box 190010
North Charleston, SC 29419-9010

RECEIVED

JUN 12 2001
Water Monitoring, Assessment &
Protection Division

Re: Draft Environmental Baseline Survey for Lease (EBSL) and Draft Finding of Suitability to Lease (FOSL) for Site of Former Buildings 664, Charleston Naval Complex, SCO 170 022 560, Revision 0, dated May 2001.

Dear Mr. Humphrey:

The South Carolina Department of Health and Environmental Control (SCDHEC) has reviewed the above referenced document according to applicable State and Federal Regulations, and the Charleston Naval Complex Hazardous Waste Permit, effective September 17, 1998. The attached comments were generated based on this review. These comments must be addressed prior to the SCDHEC's concurrence of the above referenced document.

Further, the CNC should submit, to SCDHEC, the comment responses to address these comments within thirty calendar days of the receipt of this letter. This would facilitate the comment resolution and expedite the approval process. Should you have any questions regarding these comments, please contact me at (803) 896-8955.

Sincerely,

Keith Collinsworth, P.G.
Federal Facility Liaison
EQC Administration

Attachments:

1. Memorandum from Paul Bergstrand to Mihir Mehta dated June 5, 2001.
2. Memorandum from Mihir Mehta to Keith Collinsworth dated June 5, 2001.

cc: Mihir Mehta, BLWM
Paul Bergstrand, BLWM
Michael Bishop, BOW
Rick Richter, Trident EQC

Tony Hunt, Navy
Dann Spariosu, EPA Region IV



MEMORANDUM

TO: Keith Collinworth, P.G.
Federal Facility Liaison
EQC Administration

FROM: Mihir Mehta, Project Manager *MPM*
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: June 5, 2001

RE: Charleston Naval Complex (CNC)
SCO 170 022 560

Draft Environmental Baseline Survey for Lease (EBSL) and Draft Finding of Suitability to Lease (FOSL) for Site of Former Buildings 664, Charleston Naval Complex, SCO 170 022 560, Revision 0, dated May 2001, received May 17, 2001.

The South Carolina Department of Health and Environmental Control (Department) has reviewed the above referenced document according to applicable State and Federal Regulations, and the Charleston Naval Complex Hazardous Waste Permit, effective September 17, 1998. The attached comments were generated based on this review.

Should you have any questions regarding these comments, please contact Mihir Mehta at (803) 896-4088.

Attachment: Memorandum from Paul Bergstrand to Mihir Mehta dated June 5, 2001.

South Carolina Department of Health and Environmental Control comments on: Draft Environmental Baseline Survey for Lease (EBSL) and Draft Finding of Suitability to Lease (FOSL) for Site of Former Buildings 664, Charleston Naval Complex, SCO 170 022 560, Revision 0, dated May 2001, received May 17, 2001.

Comments By Mihir Mehta:

- 1) Section 2.4. Property Classification. Page 2-4.
The Department has not concurred with the DoD/BRAC Area Types as listed in Table 2-1. But based on the information provided for the environmental condition of the subject property the Department would not disagree with the Navy for their classification of subject property as 3/Light Green (Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial response).
- 2) Section 3.0. Figure 3.1. Building 664.
Please revise this figure to show the SWMUs and AOCs that are present within one-quarter mile of the subject property proposed for lease (especially the ones listed in Section 6.0 of this document).
- 3) Section 4.3; Hydrogeology; page 4-2.
The first line states that, "Most potable water on the Charleston peninsula is supplied by surface water sources (Edisto River)." Please delete this sentence as it has no relevance pertaining to the hydrogeologic setting for the Charleston Naval Complex.
- 4) Section 6.0. Findings for Adjacent Property. Page 6-1.
 - This section does not present any information that would help understand the risk associated with the adjacent property and how does it relate the subject property. Please revise this section to include adequate information regarding the risk, hazard, or other issues related to adjacent property as deemed appropriate.
 - Please provide a map showing the sites that are adjacent to the subject property and identified in Table 6-1.
- 5) Section 6.0. Findings for Adjacent Property. Table 6-1.
 - Please provide the dates of the latest version of the document referenced in the last column. Also, provide the status of the document (being developed, being reviewed, or approved).
 - SWMU 138 indicates a "No Further Action" status in this table. According to the Permit and the Department record SWMU 138 is in the CSI/RFI status. Please revise the document.
- 6) Section 7.3. Recommendations for the further actions. Page 7-5.
Please delete the referenced section as it recommends no further action for the subject property. This recommendation is premature and not within the scope of this document.



2600 Bull Street
Columbia, SC 29201-1708

MEMORANDUM

TO: Mihir Mehta, Environmental Engineer Associate
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

FROM: Paul M. Bergstrand, P.G., and Hydrogeologist *PMB*
RCRA Hydrogeology Section
Division of Hydrogeology
Bureau of Land and Waste Management

DATE: 5 June 2001

RE: Charleston Naval Base (CNAV)
Charleston County, South Carolina
SC0-170-022-560

Draft Finding of Suitability to Lease
Draft Environmental Baseline Survey for Lease
Revision 00, Dated May 2001

The materials referenced above have been reviewed with respect to the requirements of R.61-79 of the South Carolina Hazardous Waste Management Regulations, The Environmental Protection Agency's (EPA) RCRA Facility Investigation Guidance Document dated May 1989, the EPA Region IV Environmental Compliance Branch Standard Operating Procedures and Quality Assurance Manual (SOP/QAM) dated May 1996, the CNAV Final Comprehensive Sampling and Analysis Plan dated 30 August 1994, CERFA 120(h) as amended.

Comments on the Draft Finding of Suitability to Lease and Draft Environmental Baseline Survey for Lease have been provided

Comments by Paul M. Bergstrand
Draft Finding of Suitability to Lease
Draft Environmental Baseline Survey for Lease
Dated May 2001

DRAFT FINDING OF SUITABILITY TO LEASE

1. No Comments.

DRAFT ENVIRONMENTAL BASELINE SURVEY FOR LEASE

2. Page 3-1, Section 3.0, Past and Current Operations

This section gives the impression that prior to the construction of building 664 in 1973 that no US Navy activity occurred at this location. Section 2.0, item 5 on page 2-2 of this document states "*Review of records of prior use contained in the 1996 base-wide EBS, or other available documents to ascertain prior uses of the real property which may have involved hazardous substances, otherwise contaminated the property, or created environmental or safety risks.*" The area of Building 664 was previously part of the Naval Air Station. A map of the Charleston Naval Shipyard and Contiguous Activities dated 30 June 1955 indicates EXPLOSIVES STORAGE at the edge of the Lighter Than Air (LTA) Runway which is approximately the location of Building 664. This section should describe all of the major uses of the property, including prior to the construction of Building 664, which may have involved hazardous substances, otherwise contaminated the property, or created environmental or safety risks. Please revise.

3. Page 3-1, Section 3.0, Past and Current Operations

This section states "*Bulding 664 was constructed in 1973 as "Off Crew Storage".*" This contradicts the introduction of the EBSL and Appendix A which state the building was constructed in 1974. Please correct.

4. Page 6-1, Section 6.0, Findings for Adjacent Property

The "Current Status" and "Reference" for AOC 669 in Table 6-1 is blank. Please correct.

5. Page 6-2, Section 6.0, Findings for Adjacent Property

Table 6-2, Summary of SWMUs does not include SWMU 134. The Facility Checklist in Appendix A states that "*SWMU 134 is adjacent to the subject property*". Please correct.