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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL REVIEW OF FINAL ASSESSMENT REPORT DATED 9  
MARCH 2000 FOR ZONE E SITE 27 BUILDING 221 CNC CHARLESTON SC  
04/26/2000  
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



26 April 2000

2600 Bull Street  
Columbia, SC 29201-1708

COMMISSIONER: Department of the Navy  
Douglas E. Bryant Southern Division NFEC

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Re: Final Assessment Report dated 09 March 2000  
Zone E/Site 27-Building 221 (Site Identification # 17686)  
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. Analytical results provided indicate that concentrations of PAH and metal compound(s) were reported in 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, 07 October 1999) and/or 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 221 site, with the exception noted below. 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 (groundwater) at the subject site.

One (1) soil sample collected from boring CNC27-B01 was analyzed (mobile laboratory) for BTEX compounds, naphthalene and DRO (diesel range organics), with no detections of compounds noted. This boring was selected based on predetermined criteria (section 2.3.2) which included OVA response. Boring logs indicate OVA response of > 5000 ppm with carbon filter this boring. The author is concerned that existing sampling regimen at waste oil vessels may not be sufficient to identify all contaminants potentially associated with these sites. In particular, the OVA response may be directly related to the presence of chlorinated volatile compounds (i.e., solvents for degreasing) which have not been analyzed for to date. With consideration to the above, the author requests the facility to reevaluate current assessment

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strategies for waste oil tanks and incorporate sampling and analysis for VOC (volatile organic compounds) compounds in addition to those compounds typically associated with petroleum hydrocarbons. Further, the facility is requested to identify all waste oil sites which have been assessed to date and provide reasonable justification to the Department that existing data is sufficient to adequately and accurately characterize these sites.

The facility is requested to develop an appropriate response to the above comment, including proposed sampling and reporting schedule, if appropriate, and submit same to my attention by 31 May 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