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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL REVIEW OF REQUEST TO TRANSFER FUEL DISTRIBUTION
SYSTEM (FDS) AOCS 622, 623, 624, 625, 626, 627, 629 AND 641 CNC CHARLESTON SC
03/06/1998
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



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March 6, 1998

Mr. Tony Hunt
Southern Division, NAVFACENCOM
Code 1877
P.O. Box 190010
North Charleston, SC 29419-9010

RE: Letter dated February 20, 1998:

- Transfer of Fuel Distribution System AOCs 622, 623, 624, 625, 626, 627, 629, 641 and associated facilities, from the RCRA Subtitle C to Subtitle I Authority.
- Notification of new unit (AOC 709).
- Proposed Shallow Groundwater monitoring locations for SWMU 24, AOC 613 and AOC 709 areas (Enclosure 3).

Charleston Naval Complex
SC0 170 022 560

Dear Mr. Hunt:

The Department is in receipt of your letter dated February 20, 1998 requesting to transfer AOCs 622, 623, 624, 625, 626, 627, 629 and 641, which are part of the Fuel Distribution System, from the RCRA Subtitle C to the RCRA Subtitle I authority. Previously on letter dated August 20, 1997 the Charleston Naval Base asked for the above mentioned transfer; however, not enough information to substantiate the request was available at that time. The Department suggested that additional data be presented on the identified releases and their possible sources. After a thorough review of the available information submitted since then, and the concurrence of Mr. Paul Bristol of the Bureau of Water - Groundwater Assessment and Development Section, the Department believes that the Charleston Naval Base has shown that the contamination present at most areas of the Fuel Distribution System are most likely related to releases of diesel fuel and gasoline, therefore subject to corrective action under the Subtitle I authority of RCRA. Hereby, the Department approves the CNB request to investigate and remediate AOCs 622, 623, 624, 625, 626, 627, 629 and 641 under the Department's Underground Storage Tank (UST) Program. Further investigation at this site should be coordinated with Mr. Paul Bristol of the Department's Groundwater Assessment and Development Section. SWMUs 24 and AOC 631 shall remain under the regulatory authority of Subtitle C of RCRA.

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Groundwater
Management Section

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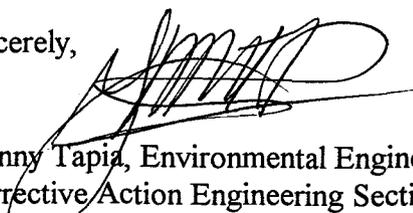
The February 20, 1998 letter also gives notification of AOC 709 (Other Impacted Area) as a new unit. The Department believes that at this time, the area located at the intersection of Hobson Avenue and Ninth St. does not need to be identified as a new unit (AOC 709). Instead the Navy shall start quarterly groundwater monitoring to verify that contaminants present are not of concern. The same is the case with the area next to the Recreation Area (south of SWMU 24) which also shall have quarterly groundwater monitoring. Details on number of wells, locations, etc., involving the quarterly groundwater monitoring and the approval of proposed locations for additional monitoring wells, depicted on Enclosure (3), should be coordinated with Mr. Paul Bergstrand of the Hydrogeology section.

Compliance with RCRA Subtitle I (i.e. GWPD requirements) will negate the need for further investigation of the above mentioned units under the RCRA Hazardous Waste Permit.

The Charleston Naval Base RCRA Permit is currently under a renewal review process, therefore the required permit revisions for the transfer of AOCs 622, 623, 624, 625, 626, 627, 629 and 641 to the Subtitle I authority can be included as part of the current permit renewal process.

If you have any questions concerning this matter please contact me at (803) 896-4179.

Sincerely,



Johnny Tapia, Environmental Engineer Associate
Corrective Action Engineering Section
Bureau of Land and Waste Management

cc: Paul Bergstrand, Hydrogeology
Paul Bristol, GWAD
Dan Spariosu, USEPA - Region IV
Rick Richter, Trident EQC