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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON THE BASE REALIGNMENT AND CLOSURE
BASE CLEANUP PLAN CNC CHARLESTON SC

5/9/1995

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



Commissioner: Douglas E. Br...

Board: John H. Burriss, Chairman
Sandra J. Molander, Secretary

Richard E. Jabbour, DDS
William M. Hull, Jr., MD
Roger Leaks, Jr.

Promoting Health, Protecting the Environment

*General File
15405*

May 9, 1995

Tony Hunt
Department of the Navy
Southern Division
Naval Facilities Engineering Command
2155 Eagle Dr., P.O. Box 190010
Charleston, SC 29411-0068

RE: Charleston Naval Base
GWPD Site #A-10-AA-13350
Base Realignment and Closure (BRAC) Base Cleanup Plan dated March 27, 1995
(received April 13, 1995)
Charleston County

Dear Mr. Hunt:

The Ground-Water Protection Division (GWPD) of the South Carolina Department of Health and Environmental Control (SCDHEC) has reviewed the referenced BRAC Base Cleanup Plan and has the following comments:

- 1) As outlined in the BRAC document, the GWPD provides regulatory oversight at UST sites and sites with documented virgin petroleum hydrocarbon contamination. All other sites are managed by the Bureau of Solid and Hazardous Waste Management RCRA program. It was noted in the BRAC document that various UST projects are listed as "complete", etc. (Table 3-5). The GWPD is unaware of some of the projects referenced. Therefore, the GWPD requests that a brief description of the various projects history and present status be submitted. Some of the projects are presently being addressed (see following submittal comments); however, the GWPD would appreciate a UST project status report for all UST sites.
- 2) The GWPD received a Request for Submittal Deadline Extension for the Short Stay Facility (#16254) on April 24, 1995. The request is for a 30-day extension for the submittal of an assessment report documenting site assessment activities that were approved by the GWPD on January 31, 1995. The extension was requested due to delays encountered in the implementation of the approved assessment activities. The 30-day extension is acceptable; therefore, the

assessment report should be submitted to the GWPD on or before May 31, 1995.

- 3) The GWPD received a Request for Submittal Deadline Extension for Building 661 (#14437) on April 27, 1995. The request is for a 90-day extension for the submittal of an assessment report documenting site assessment activities that were approved by the GWPD on January 31, 1995. The extension was requested due to delays encountered in the implementation of the approved assessment activities. The 90-day extension is acceptable; therefore, the assessment report should be submitted to the GWPD on or before July 28, 1995.

- 4) a) The GWPD received a request to dispose of drummed liquids and solids associated with well installations at Building 1346. The request indicates that the drummed soils are to be treated at SSR, Inc by thermal incineration. Analytical data provided with the request indicated all parameters were below detection. Therefore, the proposal to treat the drummed soils at SSR is acceptable.

The analytical data for the drummed water indicates the presence of contamination. Therefore, the proposal to dispose of the drummed water based on the worst case analysis is acceptable.

- b) The GWPD received an Assessment Report on April 14, 1995 for Building 1346. The report indicates that the dissolved ground-water contamination has been defined vertically and horizontally. In addition, the report indicates that a free product recovery system has been installed and is in operation. As outlined in the submittal, the status of this product recovery system is to be reported to the GWPD on a quarterly basis.

The report recommends the preparation of a corrective action plan to address the dissolved ground-water contamination plume. The GWPD concurs with this recommendation. In addition, the GWPD recommends that a quarterly monitoring program be initiated at this site. Please submit a monitoring plan to the GWPD for approval within 30 days of the receipt of this correspondence.

- 5) In correspondence received March 22, 1995, the Navy requested the incorporation of the Hobson Avenue at Viaduct Road Fuel Release within the RCRA Facility Investigation (RFI) as part of Zone "G". Upon completion of the RFI, all information pertaining to this release will be submitted to the GWPD, future project management. The GWPD concurs with this approach for this site.
- 6) The GWPD received a Closure Report (CR) for a 1,000-gallon underground storage tank containing diesel fuel located at the Fleet and Mine Warfare Training Center (FMWTC) on February 6, 1995. It was noted by the GWPD that the soil samples had been obtained on January 1, 1995 and submitted to the laboratory on January 18, 1995. In addition, the samples were not analyzed until January 31, 1995. Please note, these soil samples exceeded the appropriate holding time for

volatiles (BTEX) and the extraction holding time for total petroleum hydrocarbons (see enclosed analytical methodology guidance document). Therefore, the analytical data does not meet QA/QC requirements and will not be acceptable.

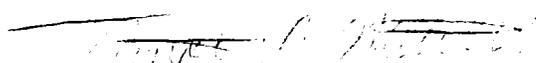
The UST removal contractor (Clean Management Environmental Group, Inc.) was notified by the GWPD of the analytical data concerns, who in response, submitted correspondence on March 24, 1995 and on March 29, 1995 which stated that additional samples had been obtained and the data was attached. Neither correspondence included the new data nor did they outline how the additional samples were obtained. Please provide information to clarify this situation.

- 7) It was noted during review of the BRAC BCP that Table 3-3 indicated two potable water permits for Short Stay and the Charleston Shipyard. The BCP indicates that the permits are "expired". Per discussions with Bureau of Drinking Water Compliance personnel, the nomenclature of permits in this situation is not completely correct. The drinking water systems had an initial permit to operate at the time of start-up. But presently these systems do not require a permit and therefore, the permits cannot "expire" as indicated in the table. Please note, there are fees associated with the water systems. However, this applies only to the Short Stay systems as the Naval Base system is master metered to the Charleston Public Works.

As outlined above, information concerning the Viaduct and Hobson fuel release and other non-ust virgin petroleum sites identified during the BCP should be submitted to the GWPD for review. If you have any questions concerning the appropriate program for a particular site, please contact either myself, Mr. Joe Bowers or Mr. David Walton of the Bureau of Solid and Hazardous Waste Management.

On all future correspondence concerning the Charleston naval Base, please reference the appropriate GWPD Site number. If you have any questions, please contact me at (803) 734-5328.

Sincerely,


Timothy A. Mettlen, Hydrogeologist
Assessment and Development Section
Ground-Water Protection Division
Bureau of Drinking Water Protection

tam/brac.cnb

cc: Christine Sanford-Coker, Trident District EQC
Joe Bowers, BSHWM
David Walton, BSHWM