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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON THE CONTAMINANT ASSESSMENT
REPORT ADDENDUM FOR ZONE G AREAS 19, 20 AND 21 CNC CHARLESTON SC
4/2/2001
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2 April 2001

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DEPARTMENT OF THE NAVY
SOUTHERN DIVISION NAVAL FEC
GABRIEL MAGWOOD
2155 EAGLE DRIVE
N. CHARLESTON SC 29406

RE: CNB - Zone G - Areas 19, 20 & 21 (Hobson Fuel Farm Area)
Site Identification #'s 01189, 01190 & 01700
Contaminant Assessment Report Addendum received 19 March 2001
Charleston County

Dear Mr. Magwood:

The Department has completed technical review of the referenced document. Based on the review the following comments are offered:

AREA 19

Per the referenced report, levels of Benzene, Ethylbenzene and Naphthalenes exceeded Risk-Based Screening Levels (RBSLs) for subsurface soils in the vicinity of Building 98 / Tank 148. Groundwater samples also exceeded RBSLs for contaminants of concern (CoCs).

The Department concurs with the recommendation that contaminated soils be excavated to eliminate the source area. However, present groundwater contamination levels indicate that active remediation of groundwater may be required in order to reduce overall groundwater contamination levels. The Department will allow for soils to be excavated immediately, followed by the installation of permanent monitoring wells to evaluate any requirements for groundwater remediation.

AREA 20

Per the referenced report, levels of Benzene and Naphthalenes exceeded Risk-Based Screening Levels (RBSLs) for subsurface soils in Area 20. Groundwater samples exceeded RBSLs for SVOCs during DPT investigations; however, groundwater samples extracted from the permanent monitoring wells did not detect any CoCs above the RBSL limits.

Soil contamination discovered in the vicinity of F20SP01404, F20SP02307 and F20SP02407 should be removed as part of corrective action activities in this area. Soil contamination in the vicinity of F20SP01709 and F20SP01906 may require removal in conjunction with proposed construction activities.

The Department concurs with the recommendation that groundwater be monitored to evaluate natural attenuation as the corrective action alternative at this site. Once soil excavation activities have been completed, a monitoring plan should be submitted in order to demonstrate the natural attenuation of groundwater contamination in this area.