

**SUMMARY REPORT
39 BANYAN DRIVE (FORMERLY 117 BANYAN DRIVE)
LAUREL BAY MILITARY HOUSING AREA
MARINE CORPS AIR STATION BEAUFORT
BEAUFORT, SC**

**Revision: 0
Prepared for:**

**Department of the Navy
Naval Facilities Engineering Command, Mid-Atlantic
9324 Virginia Avenue
Norfolk, Virginia 23511-3095**

and



**Naval Facilities Engineering Command Atlantic
9324 Virginia Avenue
Norfolk, Virginia 23511-3095**

JUNE 2021

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Prepared by:

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**Contract Number: N62470-14-D-9016
CTO WE52
JUNE 2021**

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List of Acronyms

| | |
|-----------------|---|
| bgs | below ground surface |
| BTEX | benzene, toluene, ethylbenzene, and xylenes |
| CTO | Contract Task Order |
| COPC | constituents of potential concern |
| ft | feet |
| GPR | ground penetrating radar |
| IDIQ | Indefinite Delivery, Indefinite Quantity |
| IGWA | Initial Groundwater Assessment |
| JV | Joint Venture |
| LBMH | Laurel Bay Military Housing |
| MCAS | Marine Corps Air Station |
| NAVFAC Mid-Lant | Naval Facilities Engineering Command Mid-Atlantic |
| NFA | No Further Action |
| PAH | polynuclear aromatic hydrocarbon |
| QAPP | Quality Assurance Program Plan |
| RBSL | risk-based screening level |
| SCDHEC | South Carolina Department of Health and Environmental Control |
| Site | LBMH area at MCAS Beaufort, South Carolina |
| UFP SAP | Uniform Federal Policy Sampling and Analysis Plan |
| USEPA | United States Environmental Protection Agency |
| UST | underground storage tank |
| VI | vapor intrusion |
| VISL | vapor intrusion screening level |

1.0 INTRODUCTION

The CDM - AECOM Multimedia Joint Venture (JV) was contracted by the Naval Facilities Engineering Command, Mid-Atlantic (NAVFAC Mid-Lant) to provide reporting services for the heating oil underground storage tanks (USTs) located in Laurel Bay Military Housing (LBMH) area at the Marine Corps Air Station (MCAS) Beaufort, South Carolina (Site). This work has been awarded under Contract Task Order (CTO) WE52 of the Indefinite Delivery, Indefinite Quantity (IDIQ) Multimedia Environmental Compliance Contract (Contract No. N62470-14-D-9016).

As of January 2014, the LBMH addresses were re-numbered to comply with the E-911 emergency response addressing system; however, in order to remain consistent with historical sampling and reporting for LBMH area, the residences will continue to be referenced with their original address numbers in sample nomenclature and reporting documents.

This report summarizes the results the environmental investigation activities associated with the storage of home heating oil and the potential release of petroleum constituents at the referenced property. Based on the results of the investigation, a No Further Action (NFA) determination has been made by the South Carolina Department of Health and Environmental Control (SCDHEC) for 39 Banyan Drive (Formerly 117 Banyan Drive). This NFA determination indicates that there are no unacceptable risks to human health or the environment for the petroleum constituents associated with the home heating oil USTs. The following information is included in this report:

- Background information;
- Sampling activities and results; and
- A determination of the property status.

1.1 Background Information

The LBMH area is located approximately 3.5 miles west of MCAS Beaufort. The area is approximately 970 acres in size and serves as an enlisted and officer family housing area. The area is configured with single family and duplex residential structures, and includes recreation, open space, and community facilities. The community includes approximately 1,300 housing units, including legacy Capehart style homes and newer duplex style homes. The housing area

is bordered on the west by salt marshes and the Broad River, and to the north, east and south by uplands. Forested areas lie along the northern and northeastern borders.

Capehart style homes within the LBMH area were formerly heated using heating oil stored in USTs at each residence. There were 1,100 Capehart style housing units in the LBMH area. The newer duplex homes within the LBMH area never utilized heating oil tanks. Heating oil has not been used at Laurel Bay since the mid-1980s. As was the accepted practice at the time, USTs were drained, filled with dirt, capped, and left in place when they were removed from service. Residential USTs are not regulated in the State of South Carolina (i.e., there are no federal or state laws governing installation, management, or removal).

In 2007, MCAS Beaufort began a voluntary program to remove the unregulated, residential USTs and conduct sampling activities to determine if, and to what extent, petroleum constituents may have impacted the surrounding environment. MCAS Beaufort coordinated with SCDHEC to develop removal procedures that were consistent with procedural requirements for regulated USTs. All tank removal activities and follow-on actions are conducted in coordination with SCDHEC. To date, all known USTs have been removed from all residential properties within the LBMH area.

MCAS Beaufort does not have documentation of the UST removal activities at 34 properties where it was discovered that a structure (i.e., home addition, garage, porch, or shed) had been historically constructed on top of the suspected former UST locations. The results of a historical document review and ground penetrating radar (GPR) survey at the 34 properties indicated there was no evidence that any of the former USTs remained in place beneath the structures and it was likely that the USTs were removed prior to 2007. The LBMH UST removal and assessment process is described below in Section 1.2. The LBMH multi-media investigation selection process tree, used to evaluate the environmental impact of USTs for most sites at LBMH, is presented in Appendix A. It should be noted that because soil and groundwater were not sampled following the UST removal and analytical results were not available for evaluation, the subject property of this report did not follow the typical multi-media investigation selection process presented in Appendix A.

1.2 UST Assessment Process

As stated above, the assessment process at this property did not follow the typical process presented in Appendix A. Instead the process consisted first of a vapor intrusion (VI)

assessment to evaluate the potential risk to residents at the property. Soil gas samples for the VI assessment were collected from beneath the structure in the vicinity of the suspected location of the former UST. The VI assessment was later followed by an assessment of soil and groundwater outside the footprint of the house and in the vicinity of the suspected location of the former UST to evaluate the impact, if any, to these media.

During the VI investigation, soil gas samples were analyzed for a predetermined list of constituents of potential concern (COPCs) associated with the petroleum compounds found in home heating oil. These COPCs are as follows:

- benzene, toluene, ethylbenzene, and xylenes (BTEX), and
- naphthalene.

In accordance with the SCDHEC approved *Uniform Federal Policy Sampling and Analysis Plan (UFP SAP) for Vapor Media, Revision 3* (Resolution Consultants, 2016), soil gas analytical results were compared to the United States Environmental Protection Agency (USEPA) vapor intrusion screening levels (VISLs) for soil gas (USEPA, 2016). The screening levels used for evaluation at each site were those levels that were in effect at the time of reporting and review by SCDHEC. The soil gas results were used to determine whether petroleum vapors existed due to former USTs and to assess the associated risk to human health.

Following the VI investigations, soil and initial groundwater assessment (IGWA) investigations were conducted adjacent to the former UST locations at the 34 properties as an additional precautionary measure. Soil and groundwater samples collected were analyzed for a predetermined list of COPCs associated with the petroleum compounds found in home heating oil. These COPCs, derived from the *Quality Assurance Program Plan (QAPP) for the Underground Storage Tank Management Division, Revision 3.1* (SCDHEC, 2016) and the *Underground Storage Tank Assessment Instructions for Permanent Closure and Change-In-Service*, (SCDHEC, 2018), are as follows:

- BTEX,
- naphthalene, and
- five select polynuclear aromatic hydrocarbon (PAHs): benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene and dibenz(a,h)anthracene.

In accordance with SCDHEC's *QAPP for the UST Management Division* (SCDHEC, 2016), the soil screening levels consists of SCDHEC risk-based screening levels (RBSLs). The screening levels used for evaluation at each site were those levels that were in effect at the time of reporting and review by SCDHEC.

The results of the IGWA sampling were used to determine the presence or absence of the aforementioned COPCs in groundwater and identify whether former UST locations required additional delineation of COPCs in groundwater. Groundwater analytical results were compared to SCDHEC RBSLs for groundwater. The groundwater analytical results were also compared to the site specific groundwater VISLs as another line of evidence that VI is not a concern.

2.0 SAMPLING ACTIVITIES AND RESULTS

The following section presents the sampling activities and associated results for 39 Banyan Drive (Formerly 117 Banyan Drive). The sampling activities at 39 Banyan Drive (Formerly 117 Banyan Drive) comprised a VI investigation, a soil investigation and IGWA sampling. Details regarding the VI investigation at this site are provided in the *Letter Report Petroleum Vapor Intrusion Investigations – June 2016 and January 2017, Revision 1* (Resolution Consultants, 2017). The laboratory report that includes the pertinent soil gas analytical results for this site is presented in Appendix B. Details regarding the soil and IGWA sampling activities at this site are provided in the *Soil and Initial Groundwater Investigation Report – September and October 2017, Revision 1* (CDM-AECOM Multimedia JV, 2018). The laboratory reports that include the pertinent soil and IGWA analytical results for this site are presented in Appendices C and D, respectively.

2.1 Soil Gas Sampling

On June 15, 2016, a temporary near-slab vapor pin was installed and sampled at 39 Banyan Drive (Formerly 117 Banyan Drive) in accordance with the SCDHEC approved *UFP SAP for Vapor Media, Revision 3* (Resolution Consultants, 2016). Soil gas sampling was conducted at this property to assess the potential risk for vapor intrusion associated with the suspected location of a former UST. The near-slab vapor pin was placed in the same general location as the suspected former heating oil UST, as determined by review of historical documents and GPR analysis. Further details are provided in the *Letter Report Petroleum Vapor Intrusion Investigations – June 2016 and January 2017, Revision 1* (Resolution Consultants, 2017).

The sampling strategy for this phase of the investigation required a one-time sampling event of the near-slab vapor pin. The near-slab vapor pin at 39 Banyan Drive (Formerly 117 Banyan Drive) was sampled on June 15, 2016. A soil gas sample was collected and shipped to an offsite laboratory for analysis of the petroleum COPCs. Upon completion of soil gas sampling, the vapor pin was abandoned in accordance with the *UFP SAP for Vapor Media, Revision 3* (Resolution Consultants, 2016). Field forms are provided in the *Letter Report Petroleum Vapor Intrusion Investigations – June 2016 and January 2017, Revision 1* (Resolution Consultants, 2017).

2.2 Soil Gas Analytical Results

A summary of the laboratory analytical results and USEPA VISLs is presented in Table 1. A copy of the laboratory analytical data report is included in Appendix B.

The soil gas results collected from 39 Banyan Drive (Formerly 117 Banyan Drive) were below USEPA VISLs, which indicated that the subsurface soil gas was not impacted by COPCs associated with the former UST at concentrations that present a potential risk to human health and the environment.

2.3 Soil Sampling

On September 19, 2017, a single soil boring was advanced near the suspected former UST location at 39 Banyan Drive (Formerly 117 Banyan Drive). The soil boring location is indicated on Figure 3 of the *Soil and Initial Groundwater Investigation Report – September and October 2017, Revision 1* (CDM-AECOM Multimedia JV, 2018) and was collocated with the temporary monitoring well discussed in Section 2.5. A single soil sample was collected at a depth of approximately 2 feet (ft) below ground surface (bgs). The soil sample was shipped to an offsite laboratory for analysis of the petroleum COPCs. Soil sampling was performed in accordance with the *UFP SAP for Soil and Groundwater Media* (CDM-AECOM Multimedia JV, 2017) and the applicable South Carolina regulation R.61-92, Part 280 (SCDHEC, 2017) and assessment guidelines. Field forms are provided in the *Soil and Initial Groundwater Investigation Report – September and October 2017, Revision 1* (CDM-AECOM Multimedia JV, 2018).

2.4 Soil Analytical Results

A summary of the laboratory analytical results and SCDHEC RBSLs is presented in Table 2. A copy of the laboratory analytical data report is included as Appendix C.

The soil results collected from 39 Banyan Drive (Formerly 117 Banyan Drive) were less than the SCDHEC RBSLs (Table 2), which indicated that the soil was not impacted by COPCs associated with the former UST at concentrations that present a potential risk to human health and the environment.

2.5 Groundwater Sampling

On September 19, 2017, the soil boring was converted into a temporary monitoring well and then sampled at 39 Banyan Drive (Formerly 117 Banyan Drive), in accordance with the South Carolina Well Standards and Regulations (R.61-71.H-I, updated June 24, 2016). In order to provide data that can be used to determine whether COPCs are migrating to underlying groundwater, the monitoring well was placed near the suspected location of the former heating oil UST. Further details are provided in the *Soil and Initial Groundwater Investigation Report – September and October 2017, Revision 1* (CDM-AECOM Multimedia JV, 2018).

The sampling strategy for this phase of the investigation required a one-time sampling event of the temporarily installed monitoring well. Following well installation and development, groundwater samples were collected using low-flow methods and shipped to an offsite laboratory for analysis of the petroleum COPCs. Upon completion of groundwater sampling, the temporary well was abandoned in accordance with the South Carolina Well Standards and Regulations R.61-71 (SCDHEC, 2016). Field forms are provided in the *Soil and Initial Groundwater Investigation Report – September and October 2017, Revision 1* (CDM-AECOM Multimedia JV, 2018).

2.6 Groundwater Analytical Results

A summary of the laboratory analytical results and SCDHEC RBSLs is presented in Table 3. A copy of the laboratory analytical data report is included in Appendix D.

The groundwater results collected from 39 Banyan Drive (Formerly 117 Banyan Drive) were less than the SCDHEC RBSLs and the site-specific groundwater VISLs (Table 3), which indicated that the groundwater was not impacted by COPCs associated with the former UST at concentrations that present a potential risk to human health and the environment.

3.0 PROPERTY STATUS

Based on the analytical results for soil and groundwater, SCDHEC made the determination that NFA was required for 39 Banyan Drive (Formerly 117 Banyan Drive). The NFA determination for soil and groundwater was obtained in a letter dated March 29, 2018. Based on the analytical results for soil gas, it was determined that there was not a VI concern at this property and a recommendation was made for no additional VI assessment activities. SCDHEC approved the no further VI investigation recommendation for 39 Banyan Drive (Formerly 117 Banyan Drive) in a letter dated June 20, 2017. SCDHEC's letters are provided in Appendix E.

4.0 REFERENCES

CDM-AECOM Multimedia JV, 2017. *Uniform Federal Policy Sampling and Analysis Plan for Soil and Groundwater Media for Laurel Bay Military Housing Area, Marine Corps Air Station Beaufort, Beaufort, South Carolina*, July 2017.

CDM-AECOM Multimedia JV, 2018. *Soil and Initial Groundwater Investigation Report – September and October 2017 for Laurel Bay Military Housing Area, Revision 1, Multiple Properties, Laurel Bay Military Housing Area, Marine Corps Air Station Beaufort, Beaufort, South Carolina*, February 2018.

Resolution Consultants, 2016. *Uniform Federal Policy Sampling and Analysis Plan for Vapor Media for Laurel Bay Military Housing Area, Revision 3, Multiple Properties, Laurel Bay Military Housing Area, Marine Corps Air Station Beaufort, Beaufort, South Carolina*, May 2016.

Resolution Consultants, 2017. *Letter Report Petroleum Vapor Intrusion Investigations – June 2016 and January 2017 for Laurel Bay Military Housing Area, Revision 1, Multiple Properties, Laurel Bay Military Housing Area, Marine Corps Air Station Beaufort, Beaufort, South Carolina*, June 2017.

South Carolina Department of Health and Environmental Control Bureau of Land and Waste Management, 2013. *Quality Assurance Program Plan for the Underground Storage Tank Management Division, Revision 2.0*, April 2013.

South Carolina Department of Health and Environmental Control Bureau of Land and Waste Management, 2015. *Quality Assurance Program Plan for the Underground Storage Tank Management Division, Revision 3.0*, May 2015.

South Carolina Department of Health and Environmental Control Bureau of Land and Waste Management, 2016. *Quality Assurance Program Plan for the Underground Storage Tank Management Division, Revision 3.1*, February 2016.

South Carolina Department of Health and Environmental Control Bureau of Land and Waste Management, 2017. *R.61-92, Part 280, Underground Storage Tank Control Regulations*, March 2017.

South Carolina Department of Health and Environmental Control Bureau of Land and Waste Management, 2018. *Underground Storage Tank Assessment Instructions for Permanent Closure and Change-In-Service*, March 2018.

South Carolina Department of Health and Environmental Control Bureau of Water, 2016. *R.61-71, Well Standards*, June 2016.

United States Environmental Protection Agency, 2016. *USEPA OSWER Vapor Intrusion Assessment, Vapor Intrusion Screening Level Calculator, Version 3.5.1*, May 2016.

Tables

Table 1
Laboratory Analytical Results - Vapor
39 Banyan Drive (Formerly 117 Banyan Drive)
Laurel Bay Military Housing Area
Marine Corps Air Station Beaufort
Beaufort, South Carolina

| Constituent | USEPA VISL ⁽¹⁾ | Soil Gas Results Sample Collected 06/15/2016 |
|--|---------------------------|---|
| Volatile Organic Compounds Analyzed by USEPA Method TO-15 ($\mu\text{g}/\text{m}^3$) | | |
| Benzene | 12 | 5.1 |
| Toluene | 17,000 | 17 |
| Ethylbenzene | 37 | 1.1 |
| m,p-Xylenes | 350 | 2.9 |
| o-Xylene | 350 | 1.4 |
| Naphthalene | 2.8 | 0.72 |

Notes:

⁽¹⁾ United States Environmental Protection Agency Exterior Soil Gas Vapor Intrusion Screening Level (VISL) from VISL Calculator (Version 3.5.1, May 2016). VISLs are based on a residual exposure scenario and a target risk level of 1×10^{-6} and a hazard quotient of 0.1.

The vapor laboratory report is provided in Appendix B.

Bold font indicates the analyte was detected.

Bold font and shading indicates the concentration exceeds the residential VISL.

$\mu\text{g}/\text{m}^3$ - micrograms per cubic meter

USEPA - United States Environmental Protection Agency

VISL - Vapor Intrusion Screening Level

Table 2
Laboratory Analytical Results - Soil
39 Banyan Drive (Formerly 117 Banyan Drive)
Laurel Bay Military Housing Area
Marine Corps Air Station Beaufort
Beaufort, South Carolina

| Constituent | SCDHEC RBSLs ⁽¹⁾ | Results Sample Collected 09/19/2017 |
|--|-----------------------------|--|
| Volatile Organic Compounds Analyzed by EPA Method 8260B (mg/kg) | | |
| Benzene | 0.007 | ND |
| Ethylbenzene | 1.15 | ND |
| Naphthalene | 0.036 | ND |
| Toluene | 1.45 | ND |
| Xylenes, Total | 14.5 | ND |
| Semivolatile Organic Compounds Analyzed by EPA Method 8270D (mg/kg) | | |
| Benzo(a)anthracene | 0.066 | ND |
| Benzo(b)fluoranthene | 0.066 | ND |
| Benzo(k)fluoranthene | 0.066 | ND |
| Chrysene | 0.066 | ND |
| Dibenz(a,h)anthracene | 0.066 | ND |

Notes:

⁽¹⁾ South Carolina Risk-Based Screening Levels from the Quality Assurance Program Plan for the Underground Storage Tank Management Division, Revision 3.1 (SCDHEC, February 2016).

Bold font indicates the analyte was detected.

Bold font and shading indicates the concentration exceeds the SCDHEC RBSL.

EPA - United States Environmental Protection Agency

mg/kg - milligrams per kilogram

ND - not detected at the reporting limit (or method detection limit if shown on the laboratory report). The soil laboratory report is provided in Appendix C.

RBSL - Risk-Based Screening Level

SCDHEC - South Carolina Department Of Health and Environmental Control

**Table 3
Laboratory Analytical Results - Groundwater
39 Banyan Drive (Formerly 117 Banyan Drive)
Laurel Bay Military Housing Area
Marine Corps Air Station Beaufort
Beaufort, South Carolina**

| Constituent | SCDHEC RBSLs ⁽¹⁾ | Site-Specific Groundwater VISLs (µg/L) ⁽²⁾ | Results Sample Collected 09/19/2017 |
|---|-----------------------------|---|--|
| Volatile Organic Compounds Analyzed by EPA Method 8260B (µg/L) | | | |
| Benzene | 5 | 16.24 | ND |
| Ethylbenzene | 700 | 45.95 | ND |
| Naphthalene | 25 | 29.33 | ND |
| Toluene | 1,000 | 105,445 | ND |
| Xylenes, Total | 10,000 | 2,133 | ND |
| Semivolatile Organic Compounds Analyzed by EPA Method 8270D (µg/L) | | | |
| Benzo(a)anthracene | 10 | NA | ND |
| Benzo(b)fluoranthene | 10 | NA | ND |
| Benzo(k)fluoranthene | 10 | NA | ND |
| Chrysene | 10 | NA | ND |
| Dibenz(a,h)anthracene | 10 | NA | ND |

Notes:

⁽¹⁾ South Carolina Risk-Based Screening Levels from the Quality Assurance Program Plan for the Underground Storage Tank Management Division, Revision 3.1 (SCDHEC, February 2016).

⁽²⁾ Site-specific groundwater VISLs were calculated using the EPA JE Model Spreadsheets (Version 3.1, February 2004) and conservative modeling inputs representative of a small single-story house with an 8 foot ceiling. Site-specific groundwater VISLs were developed based on a target risk level of 1×10^{-6} , a target hazard quotient of 1 (per target organ), and a default residential exposure scenario, assuming exposure for 24 hours/day, 350 days/year, for 26 years. Modeling was performed for a range of depths to groundwater for application as appropriate in different areas of the Laurel Bay Military Housing Area. The most conservative levels are presented for comparison. Refer to Appendix H of the Uniform Federal Policy Sampling Analysis and Sampling Plan for Vapor Media, Revision 4 (Resolution Consultants, April 2017) for additional information.

Bold font indicates the analyte was detected.

Bold font and shading indicates the concentration exceeds the SCDHEC RBSL and/or the Site-Specific Groundwater VISL.

EPA - United States Environmental Protection Agency

JE - Johnson & Ettinger

NA - not applicable

ND - not detected at the reporting limit (or method detection limit if shown on the laboratory report). The groundwater laboratory report is provided in Appendix D.

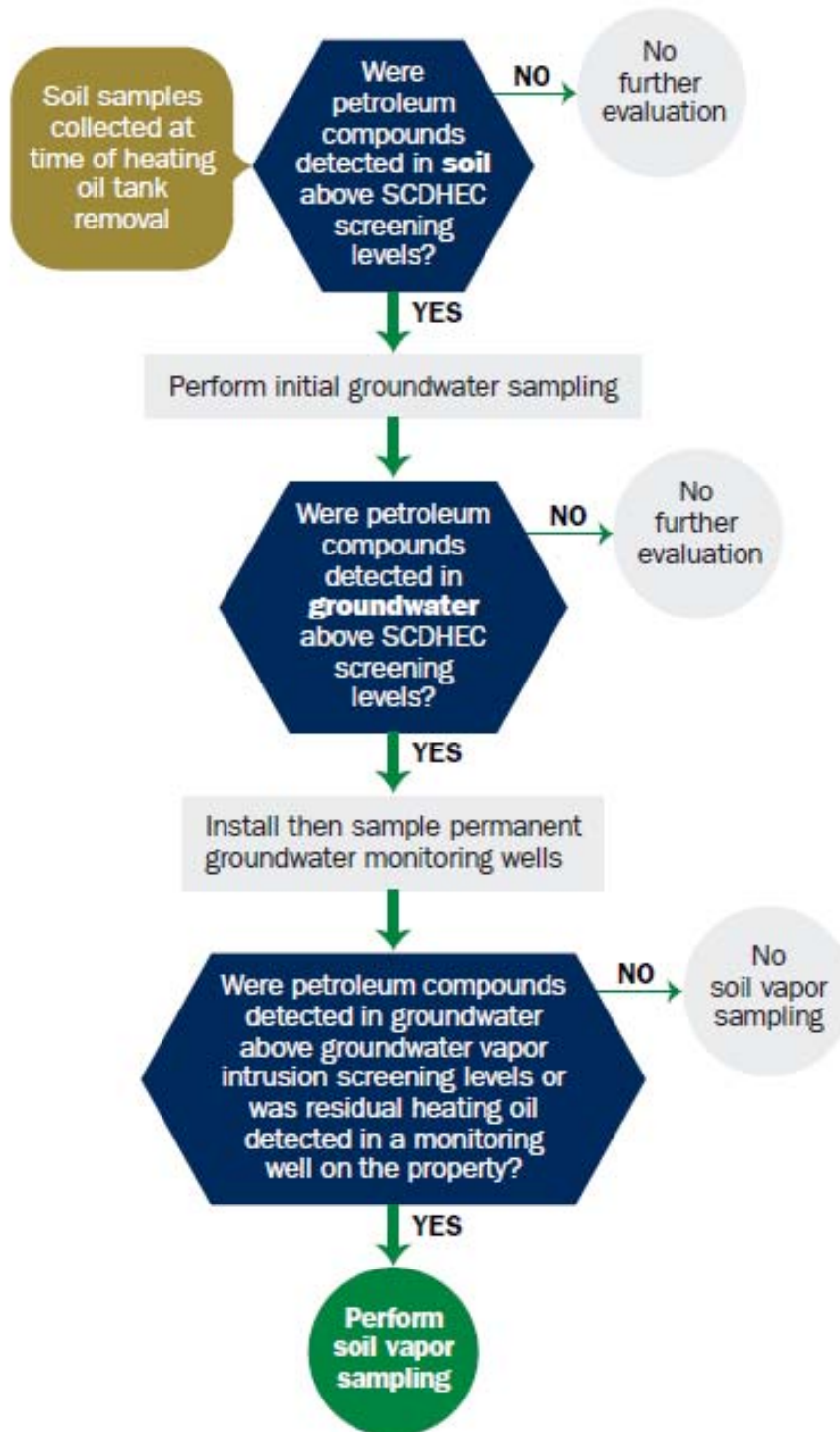
RBSL - Risk-Based Screening Level

SCDHEC - South Carolina Department Of Health and Environmental Control

µg/L - micrograms per liter

VISL - Vapor Intrusion Screening Level

Appendix A
Multi-Media Selection Process for LBMH



Appendix A - Multi-Media Selection Process for LBMH

Appendix B
Laboratory Analytical Report - Vapor

ALS ENVIRONMENTAL

RESULTS OF ANALYSIS

Page 1 of 1

Client: AECOM

Client Sample ID: BEALB117SS01GS20160615

Client Project ID: WE75 -39 Banyan Drive / 60492362.FI.WI

ALS Project ID: P1603198

ALS Sample ID: P1603198-001

Test Code: EPA TO-15

Date Collected: 6/15/16

Instrument ID: Tekmar AUTOCAN/Agilent 5975Binert/6890N/MS13

Date Received: 6/24/16

Analyst: Evelyn Alvarez

Date Analyzed: 6/27/16

Sampling Media: 1.0 L Summa Canister

Volume(s) Analyzed: 0.40 Liter(s)

Test Notes:

Container ID: 1SC01229

Initial Pressure (psig): -0.27 Final Pressure (psig): 5.29

Canister Dilution Factor: 1.39

| CAS # | Compound | Result µg/m ³ | LOQ µg/m ³ | LOD µg/m ³ | MDL µg/m ³ | Data Qualifier |
|-------------|--------------|-----------------------------|--------------------------|--------------------------|--------------------------|-------------------|
| 71-43-2 | Benzene | 5.1 | 1.7 | 1.5 | 0.56 | |
| 108-88-3 | Toluene | 17 | 1.7 | 1.5 | 0.59 | |
| 100-41-4 | Ethylbenzene | 1.1 | 1.7 | 1.5 | 0.56 | J |
| 179601-23-1 | m,p-Xylenes | 2.9 | 3.5 | 2.9 | 1.0 | J |
| 95-47-6 | o-Xylene | 1.4 | 1.7 | 1.4 | 0.52 | J |
| 91-20-3 | Naphthalene | 0.72 | 1.7 | 1.4 | 0.63 | J |

U = Undetected at the limit of detection: The associated data value is the limit of detection, adjusted by any dilution factor used in the analysis.

LOQ = Limit of Quantitation - The minimum quantity of a target analyte that can be confidently determined by the referenced method.

J = The result is an estimated concentration that is less than the LOQ but greater than or equal to the MDL.

Appendix C
Laboratory Analytical Report - Soil

Volatile Organic Compounds by GC/MS

| | |
|--|--------------------------------|
| Client: AECOM - Resolution Consultants | Laboratory ID: SI21025-005 |
| Description: BEALB117SB0102SO20170919 | Matrix: Solid |
| Date Sampled: 09/19/2017 1130 | % Solids: 81.5 09/21/2017 2237 |
| Date Received: 09/21/2017 | |

| Run | Prep Method | Analytical Method | Dilution | Analysis Date | Analyst | Prep Date | Batch |
|-----|-------------|-------------------|----------|-----------------|---------|-----------|-------|
| 1 | 5035 | 8260B | 1 | 09/27/2017 1717 | TML | | 52617 |

| Parameter | CAS Number | Analytical Method | Result | Q | LOQ | LOD | DL | Units | Run |
|-----------------|------------|-------------------|--------|---|-----|-----|-----|-------|-----|
| Benzene | 71-43-2 | 8260B | 4.6 | U | 5.8 | 4.6 | 2.3 | ug/kg | 1 |
| Ethylbenzene | 100-41-4 | 8260B | 4.6 | U | 5.8 | 4.6 | 2.3 | ug/kg | 1 |
| Naphthalene | 91-20-3 | 8260B | 4.6 | U | 5.8 | 4.6 | 2.3 | ug/kg | 1 |
| Toluene | 108-88-3 | 8260B | 4.6 | U | 5.8 | 4.6 | 2.3 | ug/kg | 1 |
| Xylenes (total) | 1330-20-7 | 8260B | 9.6 | U | 12 | 9.6 | 4.7 | ug/kg | 1 |

| Surrogate | Q | Run 1 % Recovery | Acceptance Limits |
|-----------------------|---|------------------|-------------------|
| Bromofluorobenzene | | 92 | 79-119 |
| Dibromofluoromethane | | 102 | 78-119 |
| 1,2-Dichloroethane-d4 | | 94 | 71-136 |
| Toluene-d8 | | 100 | 85-116 |

LOQ = Limit of Quantitation B = Detected in the method blank E = Quantitation of compound exceeded the calibration range DL = Detection Limit Q = Surrogate failure
 U = Not detected at or above the LOQ N = Recovery is out of criteria P = The RPD between two GC columns exceeds 40% J = Estimated result < LOQ and ≥ DL L = LCS/LCSD failure
 H = Out of holding time W = Reported on wet weight basis LOD = Limit of Detection S = MS/MSD failure

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Semivolatile Organic Compounds by GC/MS

| | |
|--|--------------------------------|
| Client: AECOM - Resolution Consultants | Laboratory ID: SI21025-005 |
| Description: BEALB117SB0102SO20170919 | Matrix: Solid |
| Date Sampled: 09/19/2017 1130 | % Solids: 81.5 09/21/2017 2237 |
| Date Received: 09/21/2017 | |

| Run | Prep Method | Analytical Method | Dilution | Analysis Date | Analyst | Prep Date | Batch |
|-----|-------------|-------------------|----------|-----------------|---------|-----------------|-------|
| 1 | 3550C | 8270D (SIM) | 5 | 10/02/2017 1605 | JCG | 09/21/2017 2154 | 52123 |

| Parameter | CAS Number | Analytical Method | Result | Q | LOQ | LOD | DL | Units | Run |
|------------------------|------------|-------------------|--------|---|-----|-----|-----|-------|-----|
| Benzo(a)anthracene | 56-55-3 | 8270D (SIM) | 12 | U | 20 | 12 | 3.6 | ug/kg | 1 |
| Benzo(b)fluoranthene | 205-99-2 | 8270D (SIM) | 6.1 | U | 20 | 6.1 | 3.0 | ug/kg | 1 |
| Benzo(k)fluoranthene | 207-08-9 | 8270D (SIM) | 6.1 | U | 20 | 6.1 | 2.9 | ug/kg | 1 |
| Chrysene | 218-01-9 | 8270D (SIM) | 6.1 | U | 20 | 6.1 | 2.7 | ug/kg | 1 |
| Dibenzo(a,h)anthracene | 53-70-3 | 8270D (SIM) | 12 | U | 20 | 12 | 3.1 | ug/kg | 1 |

| Surrogate | Q | Run 1 % Recovery | Acceptance Limits |
|-------------------------|---|------------------|-------------------|
| Fluoranthene-d10 | | 97 | 37-135 |
| 2-Methylnaphthalene-d10 | | 87 | 17-119 |

LOQ = Limit of Quantitation B = Detected in the method blank E = Quantitation of compound exceeded the calibration range DL = Detection Limit Q = Surrogate failure
 U = Not detected at or above the LOQ N = Recovery is out of criteria P = The RPD between two GC columns exceeds 40% J = Estimated result < LOQ and ≥ DL L = LCS/LCSD failure
 H = Out of holding time W = Reported on wet weight basis LOD = Limit of Detection S = MS/MSD failure

Shealy Environmental Services, Inc.
 106 Vantage Point Drive West Columbia, SC 29172 (803) 791-9700 Fax (803) 791-9111 www.shealylab.com

Appendix D
Laboratory Analytical Report - Groundwater

Volatile Organic Compounds by GC/MS

| | |
|---|-----------------------------------|
| Client: AECOM - Resolution Consultants | Laboratory ID: SI20018-012 |
| Description: BEALB117TW01WG20170919 | Matrix: Aqueous |
| Date Sampled: 09/19/2017 1545 | |
| Date Received: 09/21/2017 | |

| Run | Prep Method | Analytical Method | Dilution | Analysis Date | Analyst | Prep Date | Batch |
|-----|-------------|-------------------|----------|-----------------|---------|-----------|-------|
| 1 | 5030B | 8260B | 1 | 09/22/2017 1340 | BWS | | 52190 |

| Parameter | CAS Number | Analytical Method | Result | Q | LOQ | LOD | DL | Units | Run |
|-----------------|------------|-------------------|--------|---|-----|------|------|-------|-----|
| Benzene | 71-43-2 | 8260B | 0.80 | U | 1.0 | 0.80 | 0.40 | ug/L | 1 |
| Ethylbenzene | 100-41-4 | 8260B | 0.80 | U | 1.0 | 0.80 | 0.40 | ug/L | 1 |
| Naphthalene | 91-20-3 | 8260B | 0.80 | U | 1.0 | 0.80 | 0.40 | ug/L | 1 |
| Toluene | 108-88-3 | 8260B | 0.80 | U | 1.0 | 0.80 | 0.40 | ug/L | 1 |
| Xylenes (total) | 1330-20-7 | 8260B | 0.80 | U | 1.0 | 0.80 | 0.40 | ug/L | 1 |

| Surrogate | Q | Run 1 % Recovery | Acceptance Limits |
|-----------------------|---|------------------|-------------------|
| Bromofluorobenzene | | 95 | 85-114 |
| Dibromofluoromethane | | 87 | 80-119 |
| 1,2-Dichloroethane-d4 | | 93 | 81-118 |
| Toluene-d8 | | 91 | 89-112 |

LOQ = Limit of Quantitation B = Detected in the method blank E = Quantitation of compound exceeded the calibration range DL = Detection Limit Q = Surrogate failure
 U = Not detected at or above the LOQ N = Recovery is out of criteria P = The RPD between two GC columns exceeds 40% J = Estimated result < LOQ and ≥ DL L = LCS/LCSD failure
 H = Out of holding time W = Reported on wet weight basis LOD = Limit of Detection S = MS/MSD failure

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Semivolatile Organic Compounds by GC/MS

| | |
|---|-----------------------------------|
| Client: AECOM - Resolution Consultants | Laboratory ID: SI20018-012 |
| Description: BEALB117TW01WG20170919 | Matrix: Aqueous |
| Date Sampled: 09/19/2017 1545 | |
| Date Received: 09/21/2017 | |

| Run | Prep Method | Analytical Method | Dilution | Analysis Date | Analyst | Prep Date | Batch |
|-----|-------------|-------------------|----------|-----------------|---------|-----------------|-------|
| 1 | 3520C | 8270D | 1 | 09/26/2017 1511 | CMP2 | 09/24/2017 1331 | 52281 |

| Parameter | CAS Number | Analytical Method | Result | Q | LOQ | LOD | DL | Units | Run |
|------------------------|------------|-------------------|--------|---|------|------|-------|-------|-----|
| Benzo(a)anthracene | 56-55-3 | 8270D | 0.10 | U | 0.20 | 0.10 | 0.040 | ug/L | 1 |
| Benzo(b)fluoranthene | 205-99-2 | 8270D | 0.10 | U | 0.20 | 0.10 | 0.040 | ug/L | 1 |
| Benzo(k)fluoranthene | 207-08-9 | 8270D | 0.10 | U | 0.20 | 0.10 | 0.040 | ug/L | 1 |
| Chrysene | 218-01-9 | 8270D | 0.10 | U | 0.20 | 0.10 | 0.040 | ug/L | 1 |
| Dibenzo(a,h)anthracene | 53-70-3 | 8270D | 0.10 | U | 0.20 | 0.10 | 0.040 | ug/L | 1 |

| Surrogate | Q | Run 1 % Recovery | Acceptance Limits |
|------------------|---|------------------|-------------------|
| Nitrobenzene-d5 | | 53 | 44-120 |
| 2-Fluorobiphenyl | | 57 | 44-119 |
| Terphenyl-d14 | | 76 | 50-134 |

LOQ = Limit of Quantitation B = Detected in the method blank E = Quantitation of compound exceeded the calibration range DL = Detection Limit Q = Surrogate failure
 U = Not detected at or above the LOQ N = Recovery is out of criteria P = The RPD between two GC columns exceeds 40% J = Estimated result < LOQ and ≥ DL L = LCS/LCSD failure
 H = Out of holding time W = Reported on wet weight basis LOD = Limit of Detection S = MS/MSD failure

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Appendix E
Regulatory Correspondence



June 20, 2017

Commanding Officer
Attention: NREAO Mr. William A. Drawdy
United State Marine Corps Air Station
Post Office Box 55001
Beaufort, SC 29904-5001

RE: Approval Response to Comments and Draft Final Revision 1 Vapor Intrusion Report July 2015, January 2016 and May 2016, Laurel Bay Military Housing Area, Multiple Properties

RE: Approval Response to Comments and Draft Final Revision 1 Letter Report - Petroleum Vapor Intrusion Investigations - June 2016 and January 2017, Multiple Properties, Laurel Bay Military Housing Area

Dear Mr. Drawdy:

The South Carolina Department of Health and Environmental Control (DHEC) received the above referenced response to comments and errata pages on May 24 and June 7, 2017. The regulatory authority for the investigation and cleanup of releases from these tank systems is the South Carolina Pollution Control Act (S.C. Code Ann. §48-1-10 et seq., as amended).

DHEC has reviewed the response to comments and errata pages. Based on this review, DHEC did not generate any additional comments. Please note that the Department's decision is based on information provided by the Marine Corps Air Station (MCAS) to date. Any information found to be contradictory to this decision may require additional action. Furthermore, the Department retains the right to request further investigation if deemed necessary. If you have any questions, please contact me at petruslb@dhec.sc.gov or 803-898-0294.

Sincerely,

Laurel Petrus
Department of Defense Corrective Action Section

Cc: Russell Berry, EQC Region 8
Shawn Dolan, Resolution Consultants
Bryan Beck, NAVFAC MIDLANT



March 29, 2018

Commanding Officer
Attention: NREAO Mr. William A. Drawdy
United State Marine Corps Air Station
Post Office Box 55001
Beaufort, SC 29904-5001

RE: Approved Response to Comments
Draft Final Revision 1 Soil and Initial Groundwater Investigation Report
September and October 2017
Laurel Bay Military Housing Area

Dear Mr. Drawdy:

The South Carolina Department of Health and Environmental Control (DHEC) received the above referenced Response to Comments and change pages on February 27, 2018. The regulatory authority for the investigation and cleanup of releases from these tank systems is the South Carolina Pollution Control Act (S.C. Code Ann. §48-1-10 et seq., as amended).

DHEC has reviewed the responses and change pages. Based on this review, DHEC has not generated any additional comments. The Department agrees there is no indication of soil or groundwater contamination on 36 of the 37 properties and therefore no further investigation is required at this time on the 36 properties. (See attached list). Please note that DHEC's decision is based on information provided by the Marine Corps Air Station (MCAS) to date. Any information found to be contradictory to this decision may require additional action. Furthermore, DHEC retains the right to request further investigation if deemed necessary. If you have any questions, please contact me at petruslb@dhec.sc.gov or 803-898-0294.

Sincerely,

Laurel Petrus
Department of Defense Corrective Action Section

Cc: EQC Region 8
Shawn Dolan, Resolution Consultants
Bryan Beck, NAVFAC MIDLANT

Attachment

March 22, 2018

Draft Final Revision 1 Soil and Initial Groundwater Investigation Report
September and October 2017
Laurel Bay Military Housing Area

Properties recommended for NFA:

| | | | | | |
|-----|-----------------|-----|------------------|------|-----------------|
| 117 | Banyan Drive | 215 | Balsam Street | 521 | Laurel Bay Blvd |
| 138 | Laurel Bay Blvd | 217 | Balsam Street | 606 | Dahlia Drive |
| 146 | Laurel Bay Blvd | 266 | Beech Street | 620 | Dahlia Drive |
| 147 | Laurel Bay Blvd | 272 | Birch Drive | 680 | Camelia Drive |
| 149 | Laurel Bay Blvd | 307 | Ash Street | 685 | Camelia Drive |
| 157 | Cypress Street | 327 | Ash Street | 753 | Althea Street |
| 204 | Balsam Street | 365 | Aspen Street | 918 | Barracuda Drive |
| 205 | Balsam Street | 374 | Aspen Street | 932 | Albacore Street |
| 206 | Balsam Street | 393 | Acorn Drive | 942 | Albacore Street |
| 207 | Balsam Street | 406 | Elderberry Drive | 1203 | Cardinal Lane |
| 209 | Balsam Street | 438 | Elderberry Drive | 1229 | Dove Lane |
| 213 | Balsam Street | 461 | Elderberry Drive | 1313 | Albatross Drive |