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RESOURCE CONSERVATION AND RECOVERY ACT FACILITY ASSESSMENT VOLUME VI
REVISION 1 CNC CHARLESTON SC
2/1/2001
NAVAL FACILITIES ENGINEERING COMMAND

**RCRA
FACILITY
ASSESSMENT**

VOLUME VI

**CHARLESTON NAVAL COMPLEX
CHARLESTON, SOUTH CAROLINA**

Revision No. 1

Prepared for and by:

**Department of the Navy, Southern Division
Naval Facilities Engineering Command
North Charleston, South Carolina**

February 2001



DEPARTMENT OF THE NAVY

SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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5090/11
Code 18713
23 Feb 01

Mr. John Litton, P.E.
Director, Division of Hazardous and Infectious Waste Management
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, SC 29201

Subj: RCRA FACILITY ASSESSMENT FOR AREAS OF CONCERN 711 THROUGH 718

Dear Mr. Litton:

The purpose of this letter is to provide the RCRA Facility Assessment (RFA) for Areas of Concern (AOC) 711 through 718, which are associated with Oil/Water Separators and Waste Oil Tanks at the Charleston Naval Complex. The RFA is required by condition IV.E.2 of the RCRA Part B permit issued to the Navy by the South Carolina Department of Health and Environmental Control and the U.S. Environmental Protection Agency.

The AOCs identified under this RFA are:

<u>Site</u>	<u>Description</u>	<u>Investigation Zone</u>
AOC 711	Oil/Water Separator at Facility 200	I
AOC 712	Oil/Water Separator and Waste Oil Tank at Facility 240	F
AOC 713	Oil/Water Separator at Facility 241	F
AOC 714	Oil/Water Separator at Facility 242	F
AOC 715	Oil/Water Separator at Facility 681	I
AOC 716	Oil/Water Separator at Facility 1024	E
AOC 717	Oil/Water Separator at Facility 242	F
AOC 718	Oil/Water Separator at Facility 681	I

The investigative approach (i.e. NFA, RFI, CSI, etc.) is provided in the recommendations for each site. The Navy has previously submitted a draft of this RFA and has discussed comments and responses with Department staff. The Navy requests that the Department and the EPA review this document to ensure the changes are consistent with the resolution discussed previously and provide approval.

Subj: RCRA FACILITY ASSESSMENT FOR AREAS OF CONCERN 711 THROUGH 718

The enclosures are the replacement pages for the Revision 0 submittal. Please replace the existing spine, cover, and pages as follows:

Existing	Replacement
Spine	Spine
Cover	Cover
Table of Contents	Table of Contents
Pages 1-1 through 1-48	Pages 1-1 through 1-48
Page 2-1	Page 2-1
	Appendix B divider
	Page B-1 through B-3

If you should have any questions, please contact Matthew Humphrey or myself at (843) 743-9985 and (843) 820-5551, respectively.

Sincerely,


ROBERT A. HARRELL JR., P.E.
Environmental Engineer
BRAC Division

Copy to:
SCDHEC (4)
USEPA (Dann Spariosu)
CH2M-Hill (Dean Williamson)

5090/11
Code 18713
9 Apr 01

Mr. John Litton, P.E.
Director, Division of Hazardous and Infectious Waste Management
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, SC 29201

Subj: RCRA FACILITY ASSESSMENT FOR AREAS OF CONCERN 720

Dear Mr. Litton:

The purpose of this letter is to provide an Addendum to the RCRA Facility Assessment (RFA) for Area of Concern (AOC) 720, which is associated with Oil/Water Separators and Waste Oil Tanks at the Charleston Naval Complex. The RFA is required by condition IV.E.2 of the RCRA Part B permit issued to the Navy by the South Carolina Department of Health and Environmental Control and the U.S. Environmental Protection Agency(EPA).

The AOCs identified under this RFA are:

<u>Site</u>	<u>Description</u>	<u>Investigation Zone</u>
AOC 720	Oil/Water Separator at Building X12	G

The investigative approach (i.e. NFA, RFI, CSI, etc.) is provided in the recommendations for each site. The Navy has previously submitted a draft of this RFA and has discussed comments and responses with Department staff. The Navy requests that the Department and the EPA review this document to ensure the changes are consistent with the resolution discussed previously and provide approval.

Additionally, responses to DHEC comments provided by, Mr. Mihir Mehta, are included. The Navy's response to, Mr. Mehta's comments was not included in the Navy's 23 February 2001 letter.

Subj: RCRA FACILITY ASSESSMENT FOR AREAS OF CONCERN 720

If you should have any questions, please contact, Matthew Humphrey or myself at (843) 743-9985 and (843) 820-5551 respectively.

Sincerely,

ROBERT A. HARRELL, Jr., P.E.
Environmental Engineer
BRAC Division

Copy to:
SCDHEC (4)
USEPA (Dann Spariosu)
CSO Naval Base Charleston (Matt Humphrey)
CH2M-Hill (Dean Williamson)

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**RCRA
FACILITY
ASSESSMENT**

VOLUME VI

**CHARLESTON NAVAL COMPLEX
CHARLESTON, SOUTH CAROLINA**

Revision No. 1

Prepared for and by:

**Department of the Navy, Southern Division
Naval Facilities Engineering Command
North Charleston, South Carolina**

RCRA Facility Assessment
Charleston Naval Complex
Charleston, South Carolina

Generator ID
SC 0170022560

Prepared by
M.A. Hunt, P.E.
Southern Division,
Naval Facilities Engineering Command
North Charleston, South Carolina

23 February 2001

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Charleston, SC

1. Site Identification.

AOC 711 – Oil/Water Separator at Facility 200

2. Location of unit on a topographic map.

This site is located within investigative boundary I at the Charleston Naval Complex. The CNC is located in the Coastal Plain region of South Carolina and is indicative of the local topography. The site is relatively flat and therefore readily available topographic maps (i.e. USGS Quadrangle) provide little information relative to surface relief and stormwater runoff flow paths. The attached photographs provide an indication of the surface conditions at this site as well as an indication of the local topography.

3. Description of type and function of unit.

Building 200 is, as the date of this report, being used by NOAA as the Coastal Service Center. The building was previously used by the Navy as the Port Services Facility. The Port Services used the building for office area, machine shop and Port Navigation control for the Naval Shipyard. An Oil/Water separator was located southeast of the building and serviced effluent from the building floor drains in the boiler room and the vehicle wash pad behind the building.

4. General dimensions, capacities and structural description of unit.

Facility 200 is a two story structure constructed of block walls with a concrete roof and floor. The attached figure shows the approximate site boundaries of the AOC. The crosshatched area that depicts the unit includes the vehicle wash pad, previous location of the UST and the approximate location of the Oil/Water Separator. The total area is approximately 20' x 80'.

5. Date that the unit was operated.

The Navy operated the Port Services facility from 1954 when it was constructed until 1996 when the last Navy ships were relocated from the base. The wash area was built after Facility 200 although the exact date is not available.

6. Specification of all wastes that have been managed at the unit to the extent available. Include any available data on Appendix VIII constituents in the wastes.

The shop had a variety of hazardous materials located and segregated in designated lockers. These materials include lubricating compounds (grease, penetrating fluid, 2 cycle oil), adhesives and sealers (Loctite, Permabond, Gold bond caulk), cleaning compounds (denatured alcohol, sulfuric acid, solvents). Facility had a 1000 gallon UST providing heating oil to the boiler and a 200 gallon gasoline tank. The only hazardous waste storage reported was the 1000 gallon oily waste tank adjacent to the oil water separator and fuel storage tanks.

The wastes expected to be processed through the OWS would be oil, grease and petroleum products from the exterior surface of the vehicles and equipment.

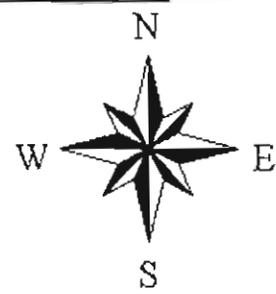
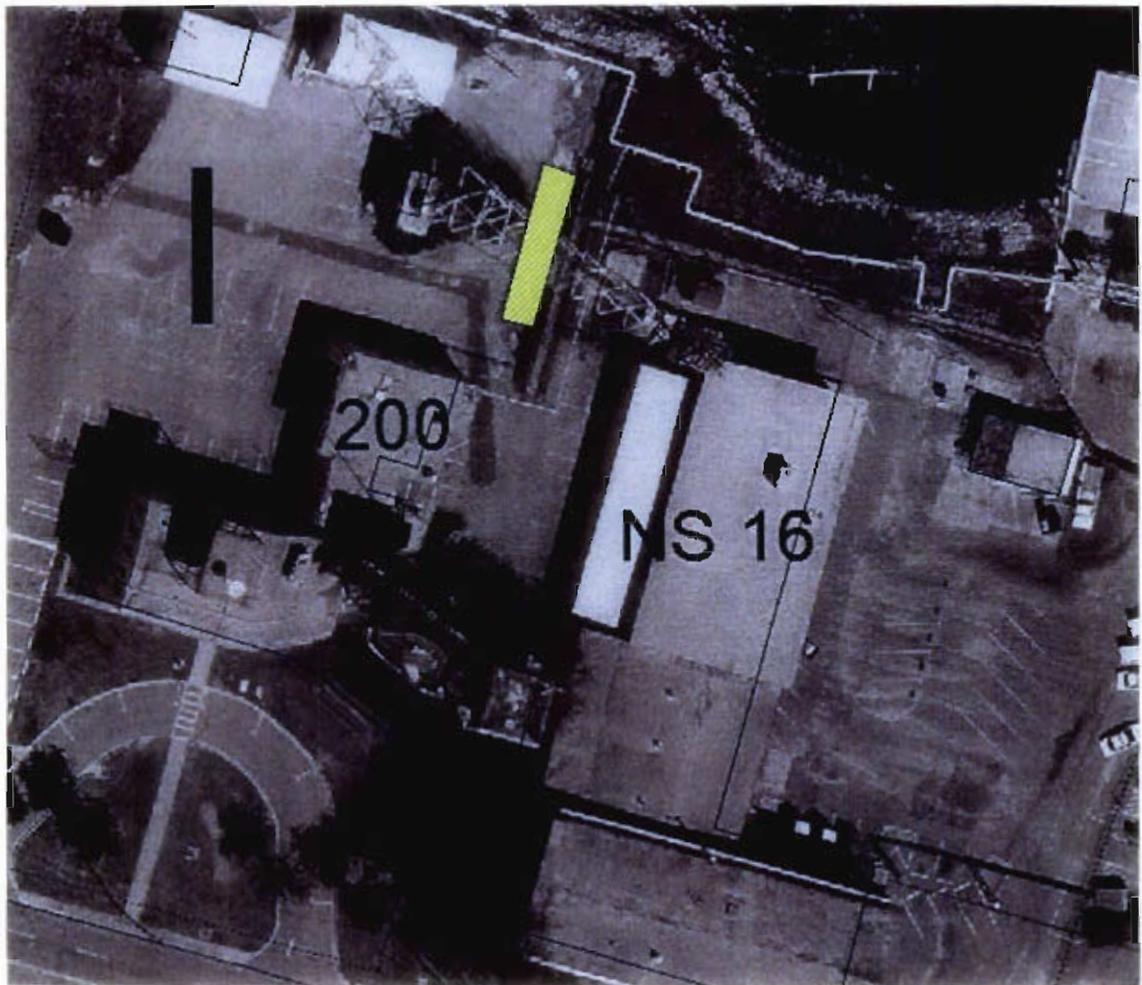
7. Available information pertaining to any release of hazardous waste or hazardous constituents from such units.

No reported releases of hazardous waste occurred at the facility. Soil and groundwater samples have been taken in the vicinity of the Oil/Water Separator as a result of the UST removal and subsequent investigation. Samples have been analyzed for petroleum constituents and selected metals as part of the Risk Based Corrective Action guidance for the UST program. The information is available in the Rapid Site Assessment Report for NS 200, Charleston Naval Complex, Charleston SC.

8. Recommendations

Based on the description of the unit and location relative to Facility 200 there is no reason to suspect that wastes generated in Facility 200 were disposed of in the catch basins of the wash area (AOC 711). Furthermore, soil and groundwater samples taken in assessing the UST adjacent to Facility 200 have found petroleum contamination, which is being addressed under the UST program. However since no samples have been taken in or around this area it is recommended that a Confirmation Sampling Investigation be initiated to determine the presence or absence of contamination from releases of the OWS. It is recommended that existing wells or suitable field screening methods be utilized to obtain representative groundwater samples to be analyzed for VOCs and SVOCs using EPA and SCDHEC approved laboratory methods.

AOC 711 Site Boundaries Bldg 200 OWS



- New ows.shp
- Fence_all.shp
- Railroad_all.shp
- Road_all.shp
- Bldg_all.shp
- Zone BoundaryZones_all.shp

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This is a view looking southeast at the UST adjacent to the wash area behind NS 200. The red and blue signs warn individuals about the tank and who to contact in the event of an emergency.



This is a view looking due east toward the Cooper River behind Building NS 200. The monitoring well in the foreground was installed during the UST site assessment.



This is a view looking due west toward Hobson Avenue from behind NS 200. In the foreground is a permanent monitoring well and beyond that is a temporary monitoring well. Several other wells including these at the site were used for assessment of the groundwater contamination found during the removal of the Diesel Fuel Oil UST from an area in the upper right portion of the asphalt paving of this photo.

1. Site Identification.

AOC 712 – Oil/Water Separator and Waste Oil Tank at Facility 240

2. Location of unit on a topographic map.

This site is located within investigative boundary F at the Charleston Naval Complex. The CNC is located in the Coastal Plain region of South Carolina and is indicative of the local topography. The site is relatively flat and therefore readily available topographic maps (i.e. USGS Quadrangle) provide little information relative to surface relief and stormwater runoff flow paths. The attached photographs provide an indication of the surface conditions at this site as well as an indication of the local topography.

3. Description of type and function of unit.

Facility 240 is, as the date of this report, being used by the Charleston Commissioner of Public Works as a vehicle wash area. The facility was previously used by the Navy as a vehicle wash area for Public Works Department. An OWS and a waste oil tank was located just northwest of the facility collected grease and oily waste.

4. General dimensions, capacities and structural description of unit.

Facility 240 has a roof with no walls. As the attached photos indicate the concrete pad that makes up the facility floor and provides slope for drainage is 15' wide and 40' long. A 6' wall separates the two wash areas. The drains from the wash areas are located in the center of each wash area. The attached figure shows the approximate site boundaries of the AOC. The crosshatched area that depicts the unit includes the vehicle wash pad, previous location of the UST and the approximate location of the Oil/Water Separator. The total area is approximately 50' x 60'.

5. Date that the unit was operated.

The Navy Public Works Department operated the facility from 1984 when it was constructed until base closure in 1993.

6. Specification of all wastes that have been managed at the unit to the extent available. Include any available data on Appendix VIII constituents in the wastes.

Several commercially available general purpose cleaning agents were available for use at the wash rack however no hazardous materials are known to have been used. The only hazardous waste storage reported was the 5000 gallon oily waste tank adjacent to the oil water separator.

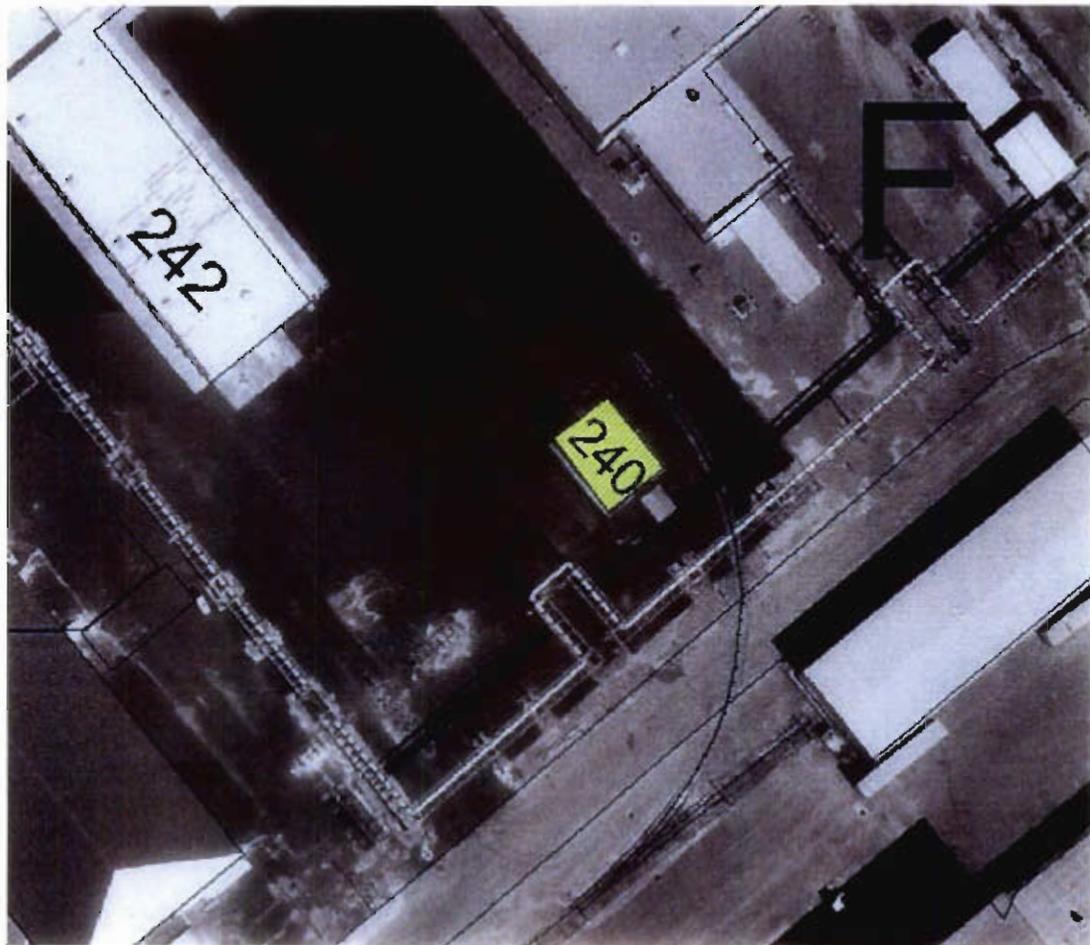
7. Available information pertaining to any release of hazardous waste or hazardous constituents from such units.

No reported releases of hazardous waste occurred at the facility. Soil and groundwater samples have been taken in the vicinity of the Oil/Water Separator as a result of the UST removal and subsequent investigation. Samples have been analyzed for petroleum constituents and select metals as part of the Risk Based Corrective Action guidance for the UST program. The information is available in the Rapid Site Assessment Report for Facility 240, Charleston Naval Complex, Charleston SC.

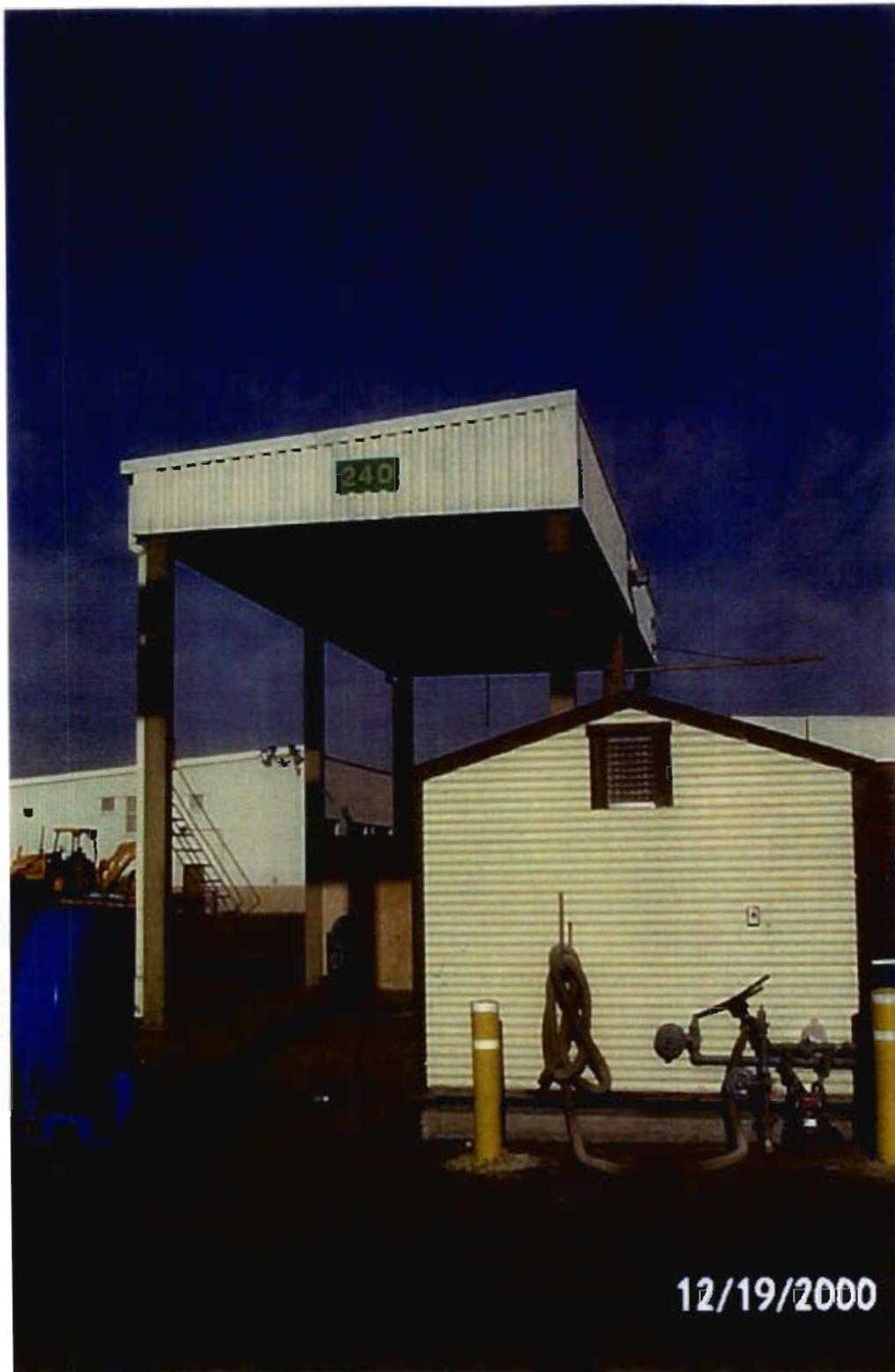
8. Recommendations

Based on the description of the unit and location there is no reason to suspect that wastes other than those generated during vehicle washing was disposed of in the catch basins of the wash area (AOC 712, See SOUTHDIV Dwg 5113790 for location of catch basins in relation to OWS). Furthermore, soil and groundwater samples taken in assessing the UST adjacent to Facility 240 have found petroleum contamination which is being addressed under the UST program.). However since no samples have been taken in or around this area it is recommended that the a Confirmation Sampling Investigation be initiated to determine the presence or absence of contamination from releases of the OWS. It is recommended that existing wells or suitable field screening methods be utilized to obtain representative groundwater samples to be analyzed for VOCs and SVOCs using EPA and SCDHEC approved laboratory methods.

AOC 712 Site Boundaries Bldg 240 OWS



- New_ows.shp
- Fence_all.shp
- Railroad_all.shp
- Road_all.shp
- Bldg_all.shp
- Zone BoundaryZones_all.shp



This is a view looking Northwest at Facility 240. In the foreground is a utility building which services wash area. The gas supply is assumed to be for a water heater however this could not be verified

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This is a view looking South east at the Facility 240 wash area. A monitoring well can be seen at the left of the photo.

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This is a view of Facility 240 looking Northwest. In the foreground is a storm sewer inlet adjacent to the fire hydrant protective posts.

1. Site Identification.

AOC 713 – Oil/Water Separator at Facility 241

2. Location of unit on a topographic map.

This site is located within investigative boundary F at the Charleston Naval Complex. The CNC is located in the Coastal Plain region of South Carolina and is indicative of the local topography. The site is relatively flat and therefore readily available topographic maps (i.e. USGS Quadrangle) provide little information relative to surface relief and stormwater runoff flow paths. The attached photographs provide an indication of the surface conditions at this site as well as an indication of the local topography.

3. Description of type and function of unit.

Facility 241 is, as the date of this report, not in use. The facility was previously used by the Navy as a Crane Maintenance Shop. An Oil/Water Separator serviced effluent from slab drains on the northeast side of the building. A fuel oil tank located on the northwest side of the facility has since been removed.

4. General dimensions, capacities and structural description of unit.

Facility 241 is a large one story structure that covers approximately 72,000 square feet. There is a small machine shop, an engine rebuild system, sandblast area, welding area and a paint spray booth located within the facility along with the crane maintenance area. The drains from the wash area on the northeast side of the building are located in the center of each wash area. The attached figure shows the approximate site boundaries of the AOC. The crosshatched area that depicts the unit includes the vehicle wash pad, and the approximate location of the Oil/Water Separator. The total area is approximately 25' x 40'. SOUTHDIV Dwg 5113790 in Appendix A shows the location of the OWS.

5. Date that the unit was operated.

The Navy Public Works Department operated the facility from 1987 when it was constructed until base closure in 1993.

6. Specification of all wastes that have been managed at the unit to the extent available. Include any available data on Appendix VIII constituents in the wastes.

No information is available on the type of cleaning agents that were used at the wash rack. Degreasing operations are known to have occurred within the building however there is no evidence of disposal in the wash area drains. The floor drains within the building discharge to the wash area on one side of the building and connect directly to the sanitary sewer on the other side.

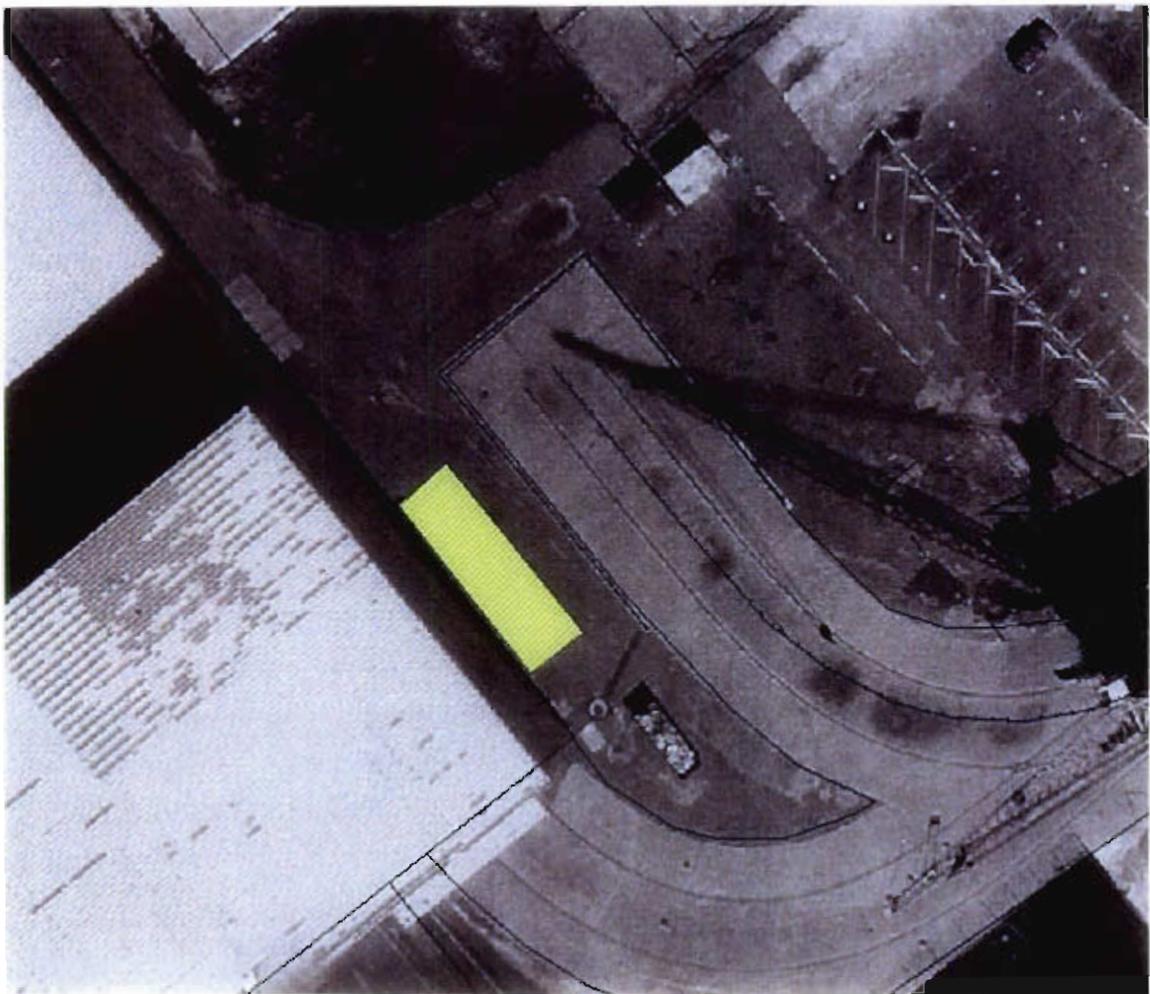
7. Available information pertaining to any release of hazardous waste or hazardous constituents from such units.

No reported releases of hazardous waste occurred at the facility. Soil and groundwater samples have been taken in the vicinity of the Fuel Oil tank as a result of the UST removal and subsequent investigation. No samples have been taken in the vicinity of the Oil/Water Separator.

8. Recommendations

Based on the description of the unit and location relative to Facility 241 there is no reason to suspect that wastes generated in Facility 200 were disposed of in the catch basins of the wash area (AOC 713, See SOUTHDIR Dwg 5113790 for location of catch basins in relation to OWS). However since no samples have been taken in or around this area it is recommended that the a Confirmation Sampling Investigation be initiated to determine the presence or absence of contamination from releases of the OWS. It is recommended that existing wells or suitable field screening methods be utilized to obtain representative groundwater samples to be analyzed for VOCs and SVOCs using EPA and SCDHEC approved laboratory methods.

AOC 713 Site Boundaries Bldg 241 OWS



- New_ows.shp
- Fence_all.shp
- Railroad_all.shp
- Road_all.shp
- Bldg_all.shp
- Zone_BoundaryZones_all.shp



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This is a view looking West at Building 241. A wash area was located on this side of the building to the right of the large crane doors.



This view shows the location of AOC 713 monitoring well 007 in relation to the Building 241 and wash area.



This is a view looking West at Building 241. The wash area has two collection sumps that connect to an Oil/Water Separator that connects to the sanitary sewer system. These Oil/Water Separators are not connected to a waste oil UST and therefore have not had any specific sampling in the vicinity.

1. Site Identification.

AOC 714 – Oil/Water Separator at Facility 242

2. Location of unit on a topographic map.

This site is located within investigative boundary F at the Charleston Naval Complex. The CNC is located in the Coastal Plain region of South Carolina and is indicative of the local topography. The site is relatively flat and therefore readily available topographic maps (i.e. USGS Quadrangle) provide little information relative to surface relief and stormwater runoff flow paths. The attached photographs provide an indication of the surface conditions at this site as well as an indication of the local topography.

3. Description of type and function of unit.

Facility 242 is, as the date of this report, being used by the Charleston Commissioner of Public Works as a vehicle maintenance shop. The facility was previously used by the Navy as a Crane Maintenance Shop. An Oil/Water Separator serviced effluent from slab drains on the northeast side of the building. A fuel oil tank located on the northwest side of the facility has since been removed.

4. General dimensions, capacities and structural description of unit.

Facility 242 is a large one story structure that covers approximately 46,000 square feet. The attached figure shows the approximate site boundaries of the AOC. The crosshatched area that depicts the approximate location of the Oil/Water Separators. The total area of is approximately 25' x 40'. SOUTH DIV Dwg 5113790 in Appendix A identifies the location of the OWSs with respect to Facility 242.

5. Date that the unit was operated.

The Navy Public Works Department operated the facility from 1987 when it was constructed until base closure in 1993.

6. Specification of all wastes that have been managed at the unit to the extent available. Include any available data on Appendix VIII constituents in the wastes.

No information is available on the type of cleaning agents that were used at the wash rack. Degreasing operations are known to have occurred within the building however there is no evidence of disposal in the wash area drains.

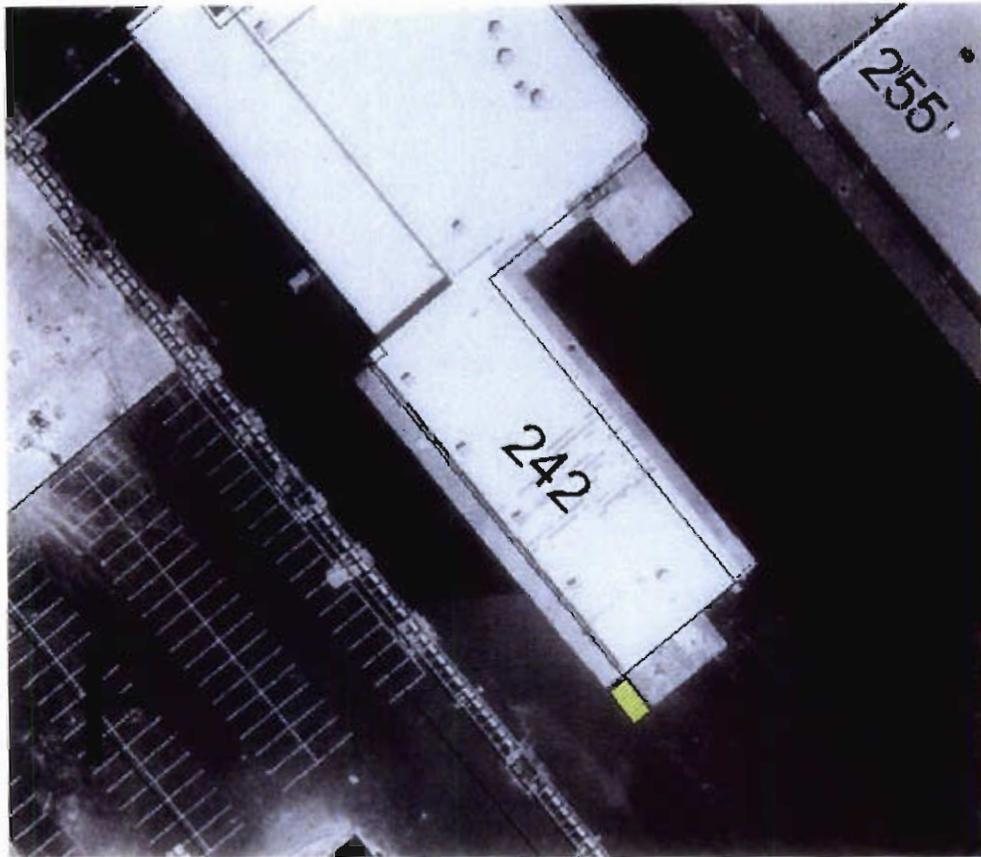
7. Available information pertaining to any release of hazardous waste or hazardous constituents from such units.

No reported releases of hazardous waste occurred at the facility. No soil and groundwater samples have been taken in the vicinity of the OWS as part of the RCRA or UST site investigations.

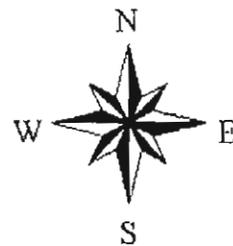
8. Recommendations

Based on the description of the unit and location relative to Facility 242 there is no reason to suspect that wastes generated in Facility 242 were disposed of in the catch basins of the wash area (AOC 714). However since no samples have been taken in or around this area it is recommended that a Confirmation Sampling Investigation be initiated to determine the presence or absence of contamination from releases of the OWS. It is recommended that existing wells or suitable field screening methods be utilized to obtain representative groundwater samples to be analyzed for VOCs and SVOCs using EPA and SCDHEC approved laboratory methods.

AOC 714 Site Boundaries Bldg 242 OWS



-  New ows.shp
-  Fence_all.shp
-  Railroad_all.shp
-  Road_all.shp
-  Bldg_all.shp
-  Zone BoundaryZones_all.shp



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This is a view looking North at the front of Building 242. There are two Oil/Water separators located in the front of the building that were not associated with any UST removal or specific groundwater investigation.

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Charleston, SC



Looking west at the washrack, on the southeastern part of Building 242.

1. Site Identification.

AOC 715 – Oil/Water Separator at Facility 681

2. Location of unit on a topographic map.

This site is located within investigative boundary I at the Charleston Naval Complex. The CNC is located in the Coastal Plain region of South Carolina and is indicative of the local topography. The site is relatively flat and therefore readily available topographic maps (i.e. USGS Quadrangle) provide little information relative to surface relief and stormwater runoff flow paths. The attached photographs provide an indication of the surface conditions at this site as well as an indication of the local topography.

3. Description of type and function of unit.

Facility 681 is as the date of this report the intermediate maintenance facility for the Charleston based Coast Guard unit. The facility was previously used by the Navy as an intermediate maintenance facility for support of ships ported at the base. An OWS is evidently located near the adjacent building NS-27. The OWS location is shown on SOUTHDIV Dwg 5077120. Two waste oil tanks located on the northeast side and on the southern end of the facility have been removed. The area around the OWS has been sampled during the investigation of AOC 681 and only petroleum contaminants were found.

4. General dimensions, capacities and structural description of unit.

Facility 681 is a large two-story structure that covers approximately 63,756 square feet. When in operation by the Navy the ground floor consisted of a hose shop, a canvass shop, a tool storage area, a valve shop, a lagging shop, an air conditioning and recovery shop a hydraulics shop, a paint booth, a blast booth, a pump shop, a machine shop, an electrical shop and a varnish dip tank. The second floor was primarily administrative space and an optical shop. The attached figure shows the approximate site boundaries of the AOC. The crosshatched area that depicts the unit includes the location of the Oil/Water Separator only. The total area of the OWS is approximately 20' x 20'.

5. Date that the unit was operated.

The building was constructed in 1985 to serve as a shop and administrative Offices for the Navy until 1994.

6. Specification of all wastes that have been managed at the unit to the extent available. Include any available data on Appendix VIII constituents in the wastes.

Degreasing operations are known to have occurred within the building; however, there is no evidence of disposal in the drains. The shop area also contained paint, thinners and epoxies used in the paint spray booth and varnish for use in the dip tanks.

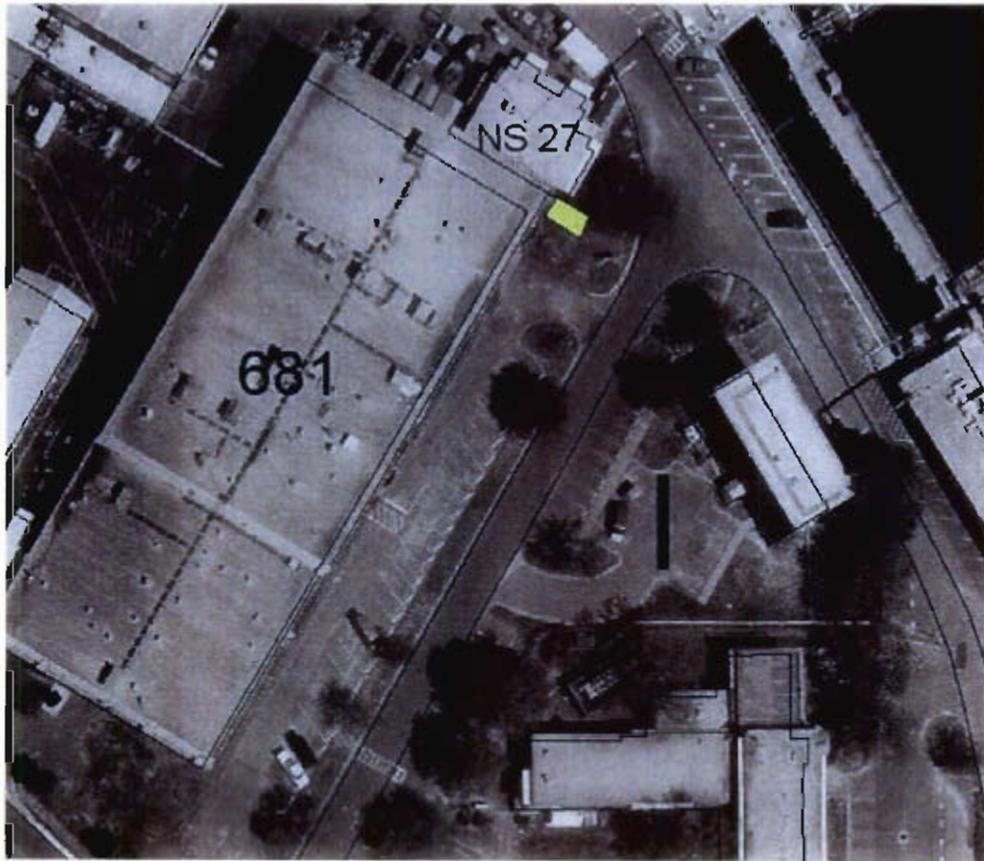
7. Available information pertaining to any release of hazardous waste or hazardous constituents from such units.

No reported releases of hazardous waste occurred at the facility. Soil and groundwater samples have been taken in the vicinity of the Oil/Water Separator as part of AOC 681 investigation.

8. Recommendations

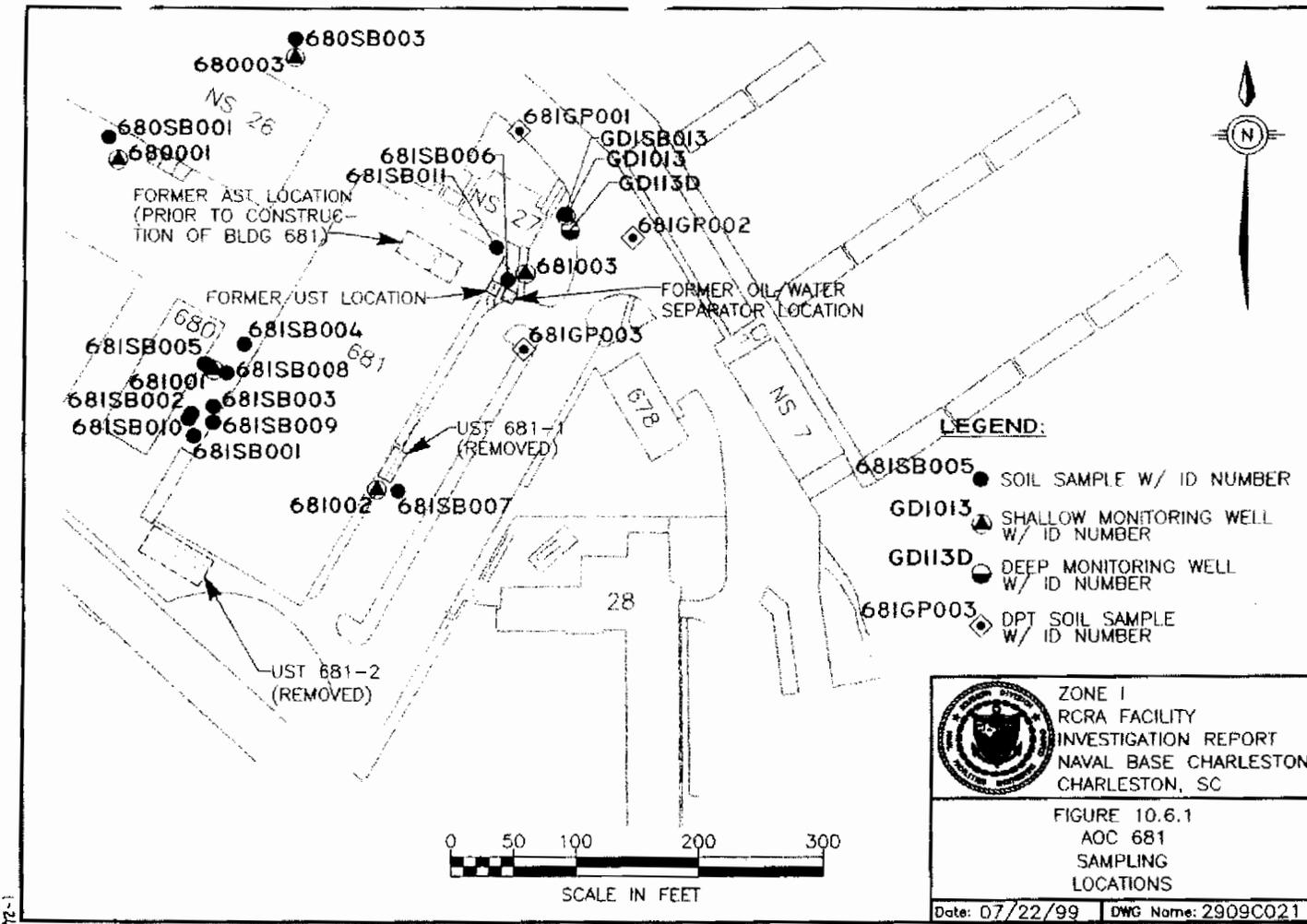
Based on the description of the unit and location relative to Facility 681 there is the possibility that wastes generated in Facility 681 were disposed of or released to the floor drains and subsequently to the OWS (AOC 715). Soil and groundwater samples have been taken in or around the area located near NS-27 and no contamination was found to provide evidence of a release. However since no samples have been taken in or around the second OWS it is recommended that the a Confirmation Sampling Investigation be initiated to determine the presence or absence of contamination from releases of the OWS. It is recommended that existing wells or suitable field screening methods be utilized to obtain representative groundwater samples to be analyzed for VOCs and SVOCs using EPA and SCDHEC approved laboratory methods.

AOC 715 Site Boundaries Bldg 681 OWS



-  New ows.shp
-  Fence_all.shp
-  Railroad_all.shp
-  Road_all.shp
-  Bldg_all.shp
-  Zone BoundaryZones_all.shp



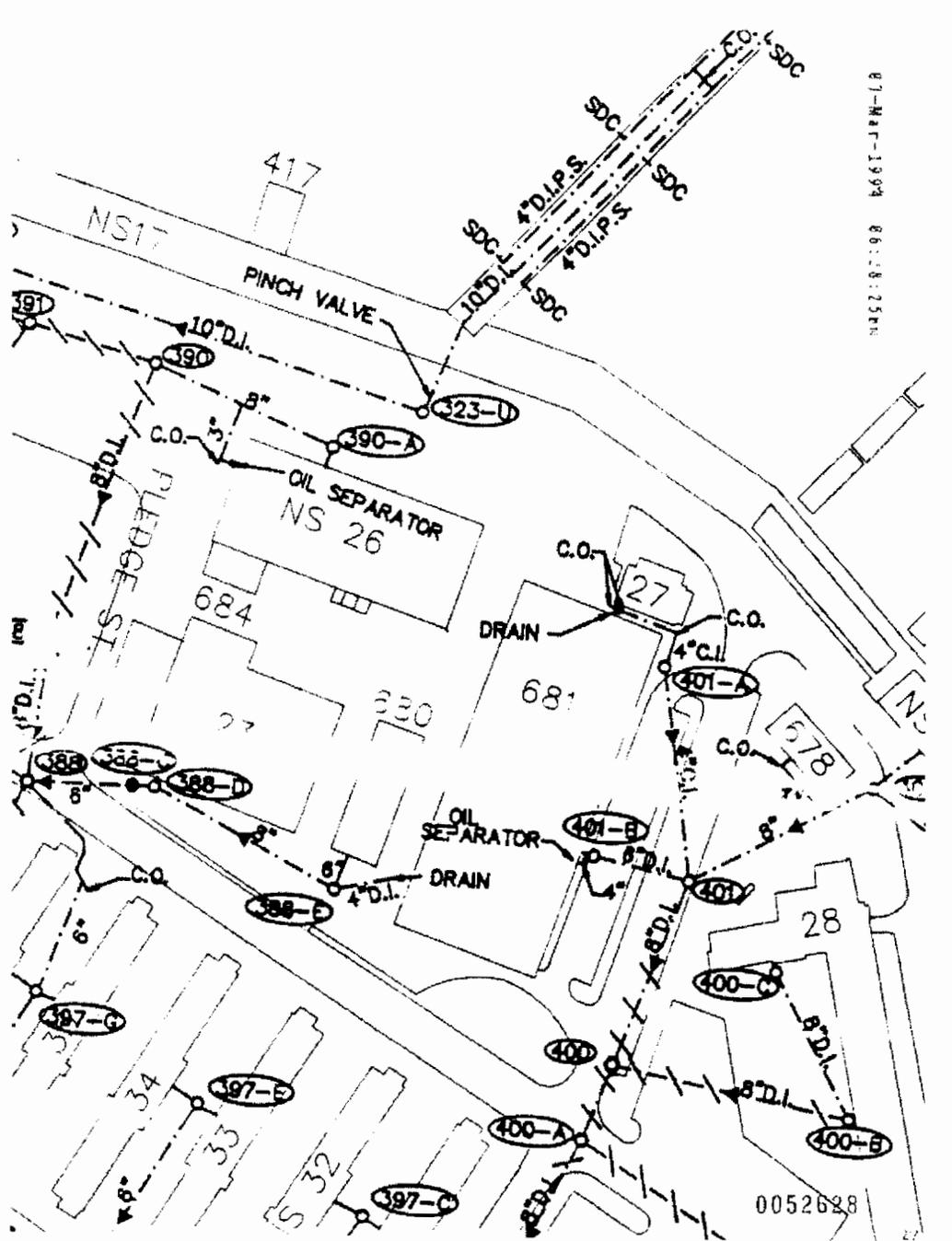


- LEGEND:**
- 681SB005 SOIL SAMPLE W/ ID NUMBER
 - ▲ GDI013 SHALLOW MONITORING WELL W/ ID NUMBER
 - GDI13D DEEP MONITORING WELL W/ ID NUMBER
 - ◆ 681GP003 DPT SOIL SAMPLE W/ ID NUMBER

	ZONE I RCRA FACILITY INVESTIGATION REPORT NAVAL BASE CHARLESTON CHARLESTON, SC
	FIGURE 10.6.1 AOC 681 SAMPLING LOCATIONS
Date: 07/22/99 DWG Name: 2909C021	

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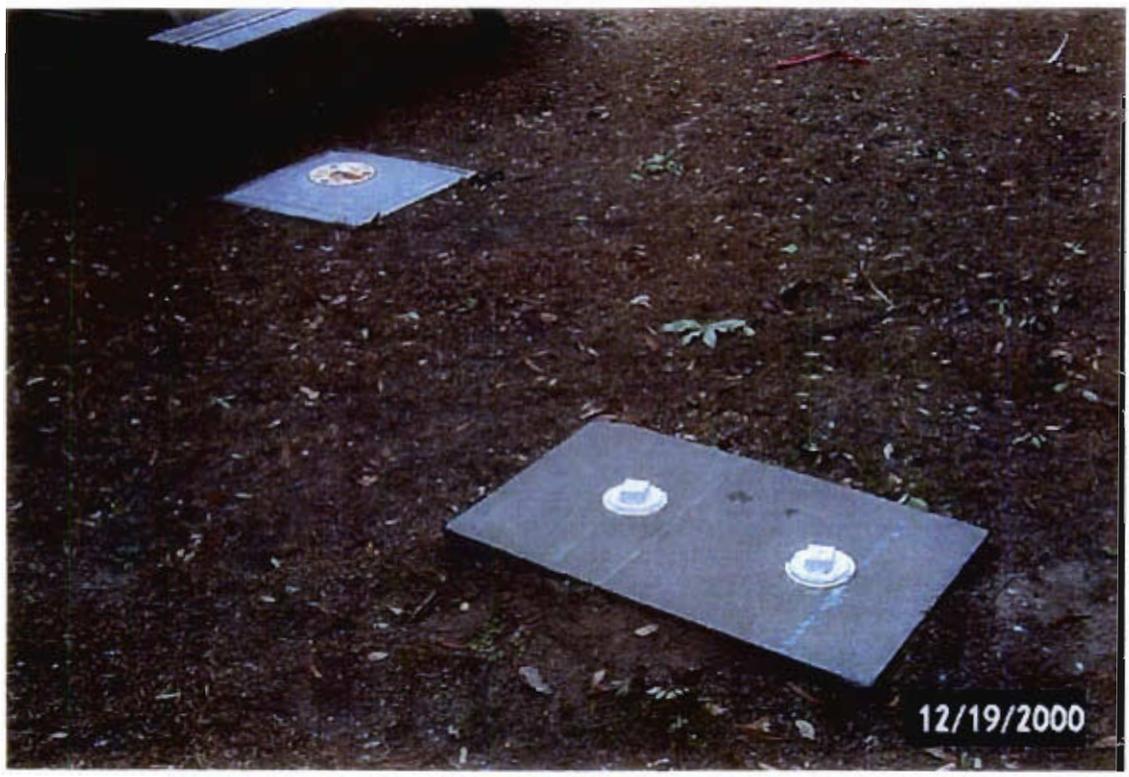
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This is view looking Northwest at the corner of Building 681 and Building NS 27. An Oil/Water Separator was reportedly located between these two buildings near the small concrete pad with the two PVC plugs in the foreground.



This is a view looking Southeast at the small concrete pad suspected to be an Oil/Water separator and an adjacent monitoring well.

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This is a view looking southwest at the corner of Building 681 and NS 27 that shows the proximity of two Zone I grid monitoring well pairs. The OWS and another monitoring well are located just to the right of the picnic tables.

1. Site Identification.

AOC 716 – Oil/Water Separator at Facility 1024

2. Location of unit on a topographic map.

This site is located within investigative boundary I at the Charleston Naval Complex. The CNC is located in the Coastal Plain region of South Carolina and is indicative of the local topography. The site is relatively flat and therefore readily available topographic maps (i.e. USGS Quadrangle) provide little information relative to surface relief and stormwater runoff flow paths. The attached photographs provide an indication of the surface conditions at this site as well as an indication of the local topography.

3. Description of type and function of unit.

Facility 1024 is, as the date of this report, used as a pipe shop for the tenant using most of the facilities within the former Navy shipyard A former acid tank was located within the building that collected overflow from dip tanks. An Oil/Water Separator serviced effluent from the acid tank and shop floor drains and discharged water to the sanitary sewer system and waste oil to an adjacent waste oil tank. The area around the OWS has not been sampled during the investigation of any RCRA site however there are wells immediately adjacent to the waste oil tank.

4. General dimensions, capacities and structural description of unit.

Facility 1024 is a medium size warehouse that covers approximately 7500 square feet. When in operation by the Navy the facility consisted of piping and valve storage areas, maintenance shops and administrative offices. The attached figure shows the approximate site boundaries of the AOC. The crosshatched area that depicts the unit includes the location of the Oil/Water Separator and the waste oil tank. The total area of AOC 716 is approximately 400 square feet (20' x 20').

5. Date that the unit was operated.

The facility was constructed in 1915 and has concrete block walls and a concrete floor. The building was once a stable but has since been used by the Navy as an air conditioning repair facility, pipe shop and storage facility. The building was constructed in 1915 to serve as a shop and administrative offices for the Navy until 1994 when operations were discontinued.

6. Specification of all wastes that have been managed at the unit to the extent available.

Include any available data on Appendix VIII constituents in the wastes.

Degreasing and pickling operations are known to have occurred within the building however there is no evidence of disposal in the drains. The shop area also contained lubricant and adhesives for valve maintenance. No information is available on the specification of these chemicals.

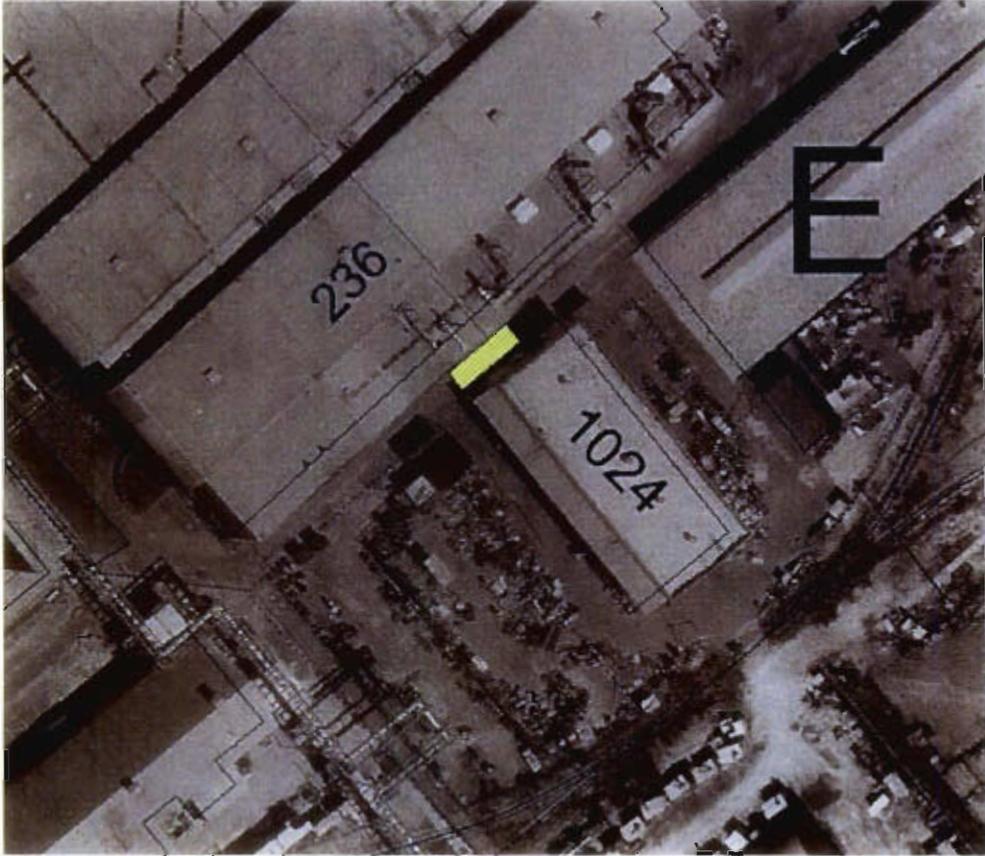
7. Available information pertaining to any release of hazardous waste or hazardous constituents from such units.

No reported releases of hazardous waste occurred at the facility. No soil and groundwater samples have been taken in the vicinity of the Oil/Water Separator as part of any RCRA investigation.

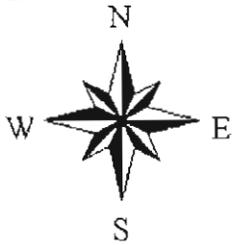
8. Recommendations

Based on the description of the unit and location relative to Facility 1024 there is the possibility that wastes generated in Facility 1024 were disposed of or released to the floor drains and subsequently to the OWS (AOC 716). No soil or groundwater samples analysis are available in or around this area. A groundwater monitoring well is located within ten feet of the waste oil tank. Since no data is available for this area it is recommended that the a Confirmation Sampling Investigation be initiated to determine the presence or absence of contamination from releases of the OWS. It is recommended that existing wells or suitable field screening methods be utilized to obtain representative groundwater samples to be analyzed for VOCs and SVOCs using EPA and SCDHEC approved laboratory methods.

AOC 716 Site Boundaries BLD 1024 OWS

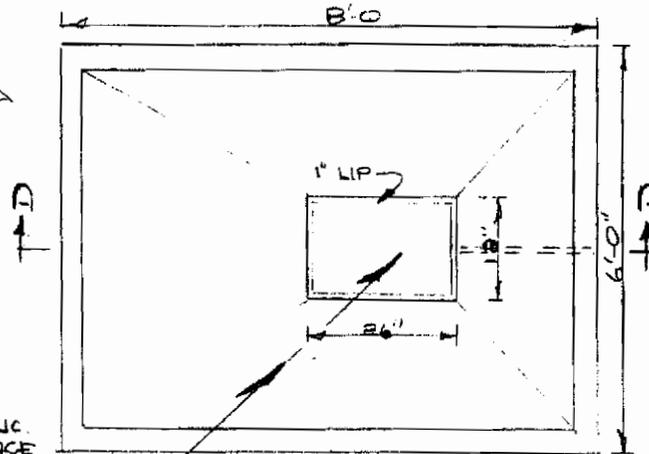
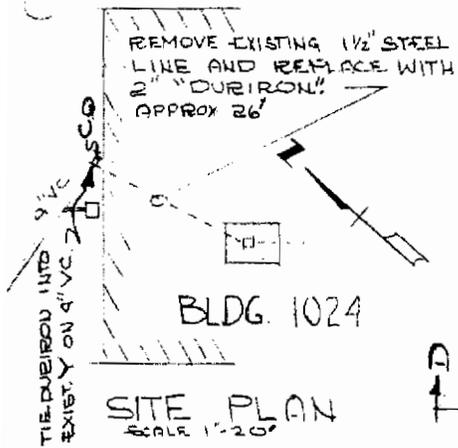


-  New_ows.shp
-  Fence_all.shp
-  Railroad_all.shp
-  Road_all.shp
-  Bldg_all.shp
-  Zone_BoundaryZones_all.shp

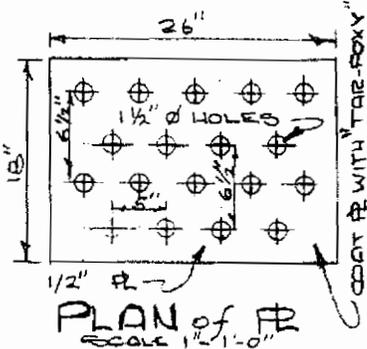
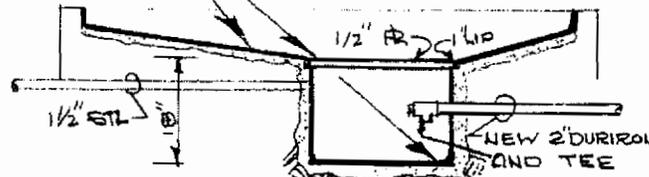


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BY ERS DATE 4/24/61 SUBJECT BUILDING 1024 SHEET NO. 1 OF 1
 CHKD. BY RED DATE 4/24/61 REPAIR OF ACID PIT JOB NO. WE 6-3641
 PWD-H-1024-11



CHIP BRICK OUT OF C.B. AND SPALLED CONC. OFF OF APRON, REPLACE WITH A GROUT OF 1:3 MIX AND COAT ENTIRE AREA WITH "TAR-POXY" BY THE HULCRETE CO. FOLLOWING MFRS. DIRECTIONS.



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This is a view looking Northeast at Building 1024. A former Oil/Water separator was located just outside of the garage doors on the front of the building.

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This is a view looking Southwest at the surface penetrations from a UST. It is not certain whether an Oil/Water separator still exists in this area. The penetrations appear to be for fill and vent purposes.



This is a view looking directly downward on the UST penetrations.

1. Site Identification.

AOC 717 – Oil/Water Separator at Facility 242

2. Location of unit on a topographic map.

This site is located within investigative boundary F at the Charleston Naval Complex. The CNC is located in the Coastal Plain region of South Carolina and is indicative of the local topography. The site is relatively flat and therefore readily available topographic maps (i.e. USGS Quadrangle) provide little information relative to surface relief and stormwater runoff flow paths. The attached photographs provide an indication of the surface conditions at this site as well as an indication of the local topography.

3. Description of type and function of unit.

Facility 242 is, as the date of this report, being used by the Commissioner of Public Works as a vehicle maintenance shop. The facility was previously used by the Navy as a Crane Maintenance Shop. An Oil/Water Separator serviced effluent from slab drains on the northeast side of the building. A fuel oil tank located on the northwest side of the facility has since been removed.

4. General dimensions, capacities and structural description of unit.

Facility 242 is a large one story structure that covers approximately 46,000 square feet. The attached figure shows the approximate site boundaries of the AOC. The crosshatched area that depicts the approximate location of the Oil/Water Separators. The total area of is approximately 25' x 40'. SOUTHDIV Dwg 5113790 in Appendix A identifies the location of the OWS with respect to Facility 242.

5. Date that the unit was operated.

The Navy Public Works Department operated the facility from 1987 when it was constructed until base closure in 1993.

6. Specification of all wastes that have been managed at the unit to the extent available. Include any available data on Appendix VIII constituents in the wastes.

No information is available on the type of cleaning agents that were used at the wash rack. Degreasing operations are known to have occurred within the building however there is no evidence of disposal in the wash area drains.

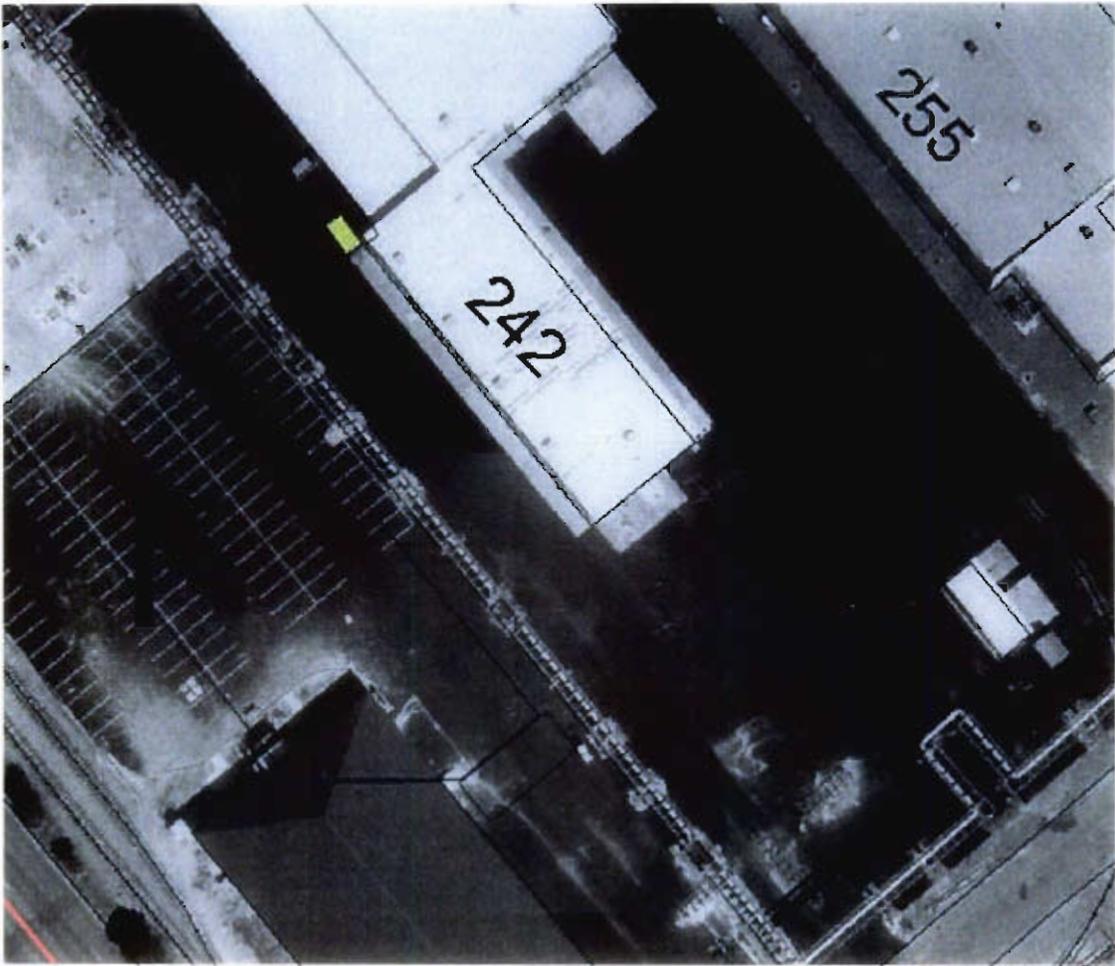
7. Available information pertaining to any release of hazardous waste or hazardous constituents from such units.

No reported releases of hazardous waste occurred at the facility. No soil and groundwater samples have been taken in the vicinity of the OWS as part of the RCRA or UST site investigations.

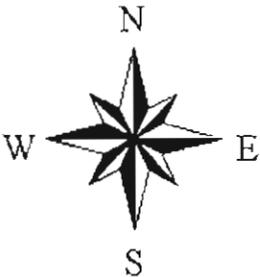
8. Recommendations

Based on the description of the unit and location relative to Facility 242 there is no reason to suspect that wastes generated in Facility 242 were disposed of in the catch basins of the wash area (AOC 714). However since no samples have been taken in or around this area it is recommended that a Confirmation Sampling Investigation be initiated to determine the presence or absence of contamination from releases of the OWS. It is recommended that existing wells or suitable field screening methods be utilized to obtain representative groundwater samples to be analyzed for VOCs and SVOCs using EPA and SCDHEC approved laboratory methods.

AOC 717 Site Boundaries Bldg 242 OWS



- New ows.shp
- Fence_all.shp
- Railroad_all.shp
- Road_all.shp
- Bldg_all.shp
- Zone BoundaryZones_all.shp





Looking toward the northeast, on the west side of Facility 242. Note the monitoring well in the foreground.



Looking northwest, inside of Facility 242 at the floor drains along the edge of the floor.

1. Site Identification.

AOC 718 – Oil/Water Separator at Facility 681

2. Location of unit on a topographic map.

This site is located within investigative boundary I at the Charleston Naval Complex. The CNC is located in the Coastal Plain region of South Carolina and is indicative of the local topography. The site is relatively flat and therefore readily available topographic maps (i.e. USGS Quadrangle) provide little information relative to surface relief and stormwater runoff flow paths. The attached photographs provide an indication of the surface conditions at this site as well as an indication of the local topography.

3. Description of type and function of unit.

Facility 681 is, as the date of this report, the intermediate maintenance facility for the Charleston based Coast Guard unit. The facility was previously used by the Navy as an intermediate maintenance facility for support of ships ported at the base. An Oil/Water Separator serviced effluent from shop floor drains on the northeast side of the building. The OWS location is shown on SOUTH DIV Dwg 5077120. Two waste oil tanks located on the northeast side and on the southern end of the facility have been removed. The area around the OWS has been sampled during the investigation of AOC 681 and only petroleum contaminants were found.

4. General dimensions, capacities and structural description of unit.

Facility 681 is a large two-story structure that covers approximately 63,756 square feet. When in operation by the Navy the ground floor consisted of a hose shop, a canvass shop, a tool storage area, a valve shop, a lagging shop, an air conditioning and recovery shop a hydraulics shop, a paint booth, a blast booth, a pump shop, a machine shop, an electrical shop and a varnish dip tank. The second floor was primarily administrative space and an optical shop. The attached figure shows the approximate site boundaries of the AOC. The crosshatched area that depicts the unit includes the location of the Oil/Water Separator only. The total area of the OWS is approximately 20' x 20'.

5. Date that the unit was operated.

The building was constructed in 1985 to serve as a shop and administrative Offices for the Navy until 1994.

6. Specification of all wastes that have been managed at the unit to the extent available. Include any available data on Appendix VIII constituents in the wastes.

Degreasing operations are known to have occurred within the building however there is no evidence of disposal in the drains. The shop area also contained paint, thinners and epoxies used in the paint spray booth and varnish for use in the dip tanks.

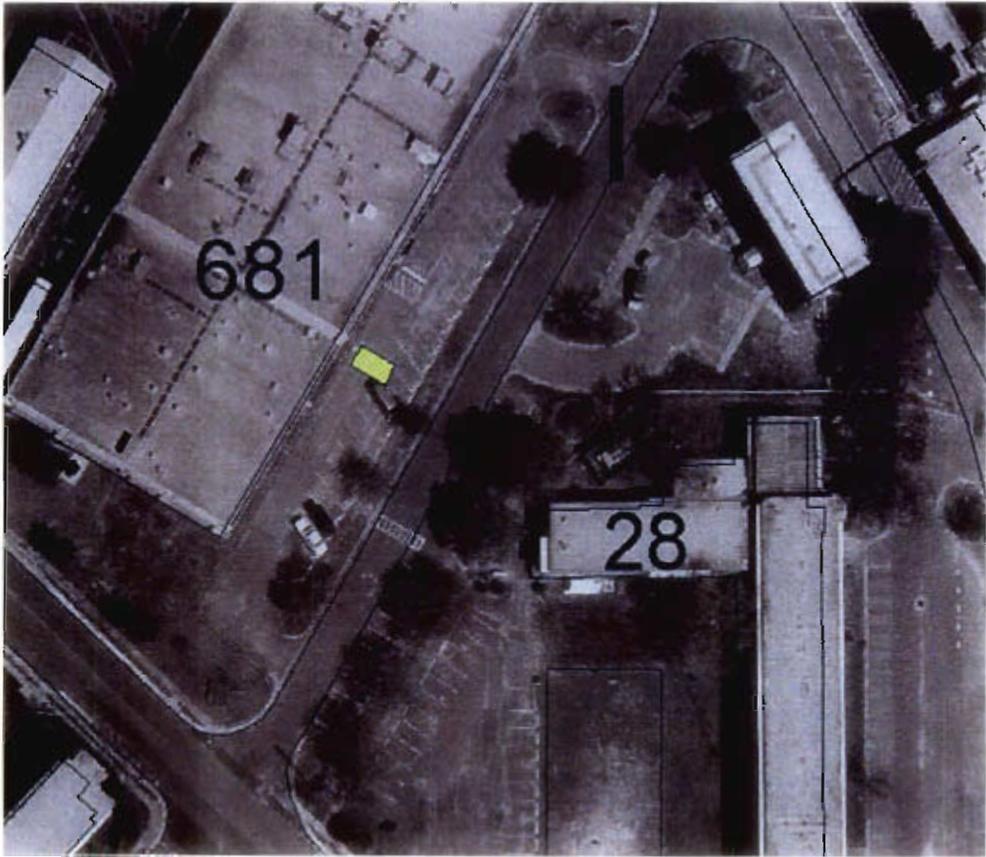
7. Available information pertaining to any release of hazardous waste or hazardous constituents from such units.

No reported releases of hazardous waste occurred at the facility. Soil and groundwater samples have been taken in the vicinity of the Oil/Water Separator as part of AOC 681 investigation.

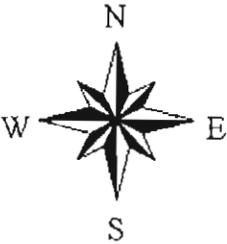
8. Recommendations

Based on the description of the unit and location relative to Facility 681 there is the possibility that wastes generated in Facility 681 were disposed of or released to the floor drains and subsequently to the OWS (AOC 717). Soil and groundwater samples have been taken in or around the area. However since no samples have been taken in or around this OWS it is recommended that a Confirmation Sampling Investigation be initiated to determine the presence or absence of contamination from releases of the OWS. It is recommended that existing wells or suitable field screening methods be utilized to obtain representative groundwater samples to be analyzed for VOCs and SVOCs using EPA and SCDHEC approved laboratory methods

AOC 718 Site Boundaries Bldg 681 OWS



- New_ows.shp
- Fence_all.shp
- Railroad_all.shp
- Road_all.shp
- Bldg_all.shp
- Zone BoundaryZones_all.shp



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Looking toward the northeast on the east side of Building 681. The red sign identifies the location of the oil water separator.



Looking to the west, on the east side of Building 681. The red sign identifies the location of the oil water separator. A monitoring well (white cover) is close to the oil water separator

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1. Site Identification.

AOC 720 – Oil/Water Separator (OWS) at Facility X12

2. Location of unit on a topographic map.

This site is located within investigative boundary G at the Charleston Naval Complex. The CNC is located in the Coastal Plain region of South Carolina and is indicative of the local topography. The site is relatively flat and therefore readily available topographic maps (i.e. USGS Quadrangle) provide little information relative to surface relief and stormwater runoff flow paths. The attached photographs provide an indication of the surface conditions at this site as well as an indication of the local topography.

3. Description of type and function of unit.

Building X12 is, as the date of this report, not in service. The building was previously used by the Navy as a Carpenter Shop. An OWS was located southeast of the building. The OWS appears to have serviced a freestanding wash pad that was not associated with the operations at Building X12. The OWS is being assigned to Building X12, as Building X12 is the closest identifiable building.

4. General dimensions, capacities and structural description of unit.

The attached figure shows the approximate site boundaries of the AOC. The crosshatched area that depicts the unit includes the wash pad and the approximate location of the OWS. The total area is approximately 16' x 30'.

5. Date that the unit was operated.

The Navy operated the Carpenter shop from 1943 when it was constructed until 1996. The wash area was built after Building X12 although the exact date is not available.

6. Specification of all wastes that have been managed at the unit to the extent available. Include any available data on Appendix VIII constituents in the wastes.

The 1995 Environmental Baseline Survey did not indicate the storage of hazardous material at the shop. However, it is expected that paint, paint thinner, paint cleaner, glues and other substance common to wood working were stored in Building X12. However, it is unlikely that these substances were disposed of or used at the vehicle wash pad. The wastes expected to be processed through the OWS would be oil, grease and petroleum products from the exterior surface of the vehicles and equipment.

7. Available information pertaining to any release of hazardous waste or hazardous constituents from such units.

No reported releases of hazardous waste occurred at the facility. However, Solid Waste Management Unit (SWMU) 35 is located to the east of Building X12. The information is available in the Rapid Site Assessment Report for SWMU 35, Charleston Naval Complex, Charleston SC.

8. Recommendations.

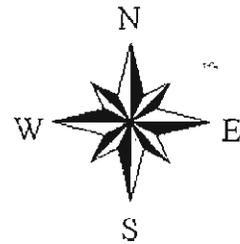
Based on the description of the unit and location relative to Building X12, there is no reason to suspect that wastes generated in Building X12 were disposed of in the catch basins of the wash area (AOC 720). However, since no samples have been taken in or around this area it is recommended that a Confirmation Sampling Investigation be initiated to determine the presence or absence of contamination from releases of the OWS. It is recommended that existing wells or suitable field screening methods be utilized to obtain representative groundwater samples to be analyzed for VOCs and SVOCs using EPA and SCDHEC approved laboratory methods.

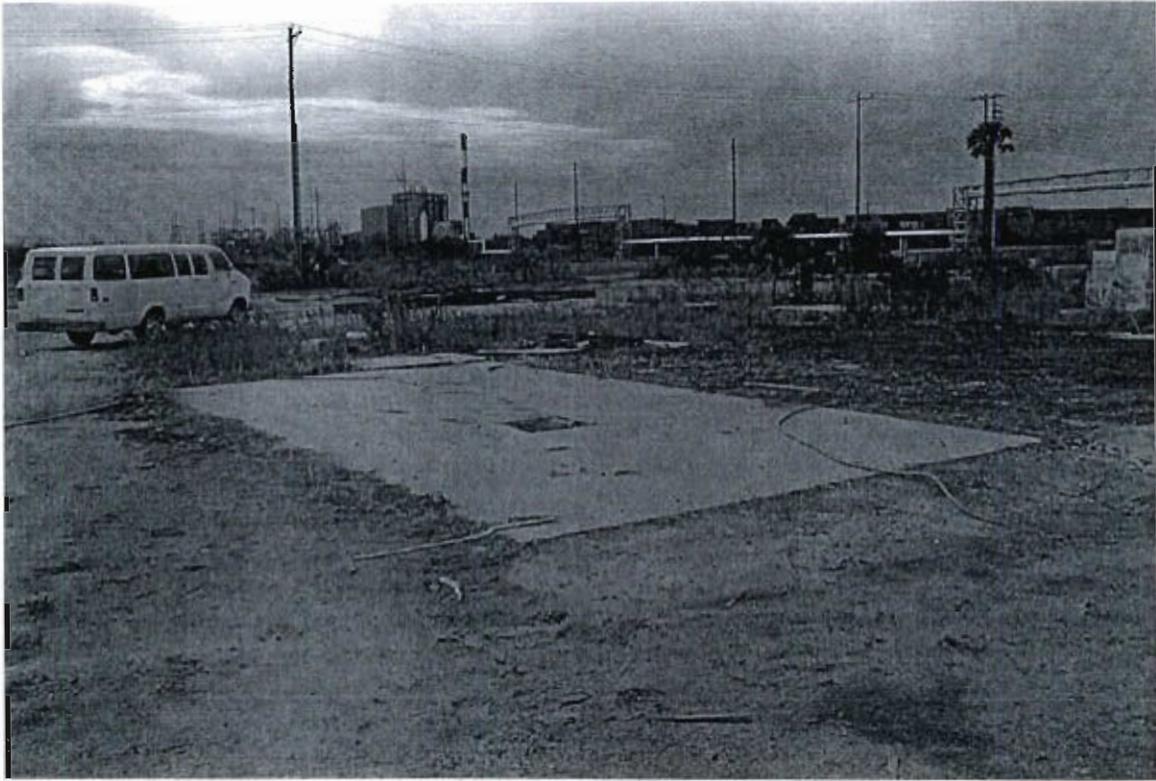
AOC 720 Site Boundaries Bldg X12 OWS



100 0 100 200 Feet

-  New_ows.shp
-  Fence_all.shp
-  Railroad_all.shp
-  Road_all.shp
-  Bldg_all.shp
-  Zone_BoundaryZones_all.shp





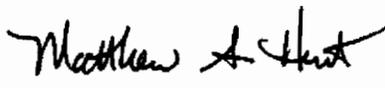
Remaining slab from the wash pad behind Building X12, looking toward Hobson Avenue.



Pipe and other surface debris around the wash pad, behind Building X12, looking toward Hobson Avenue.

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February 2001

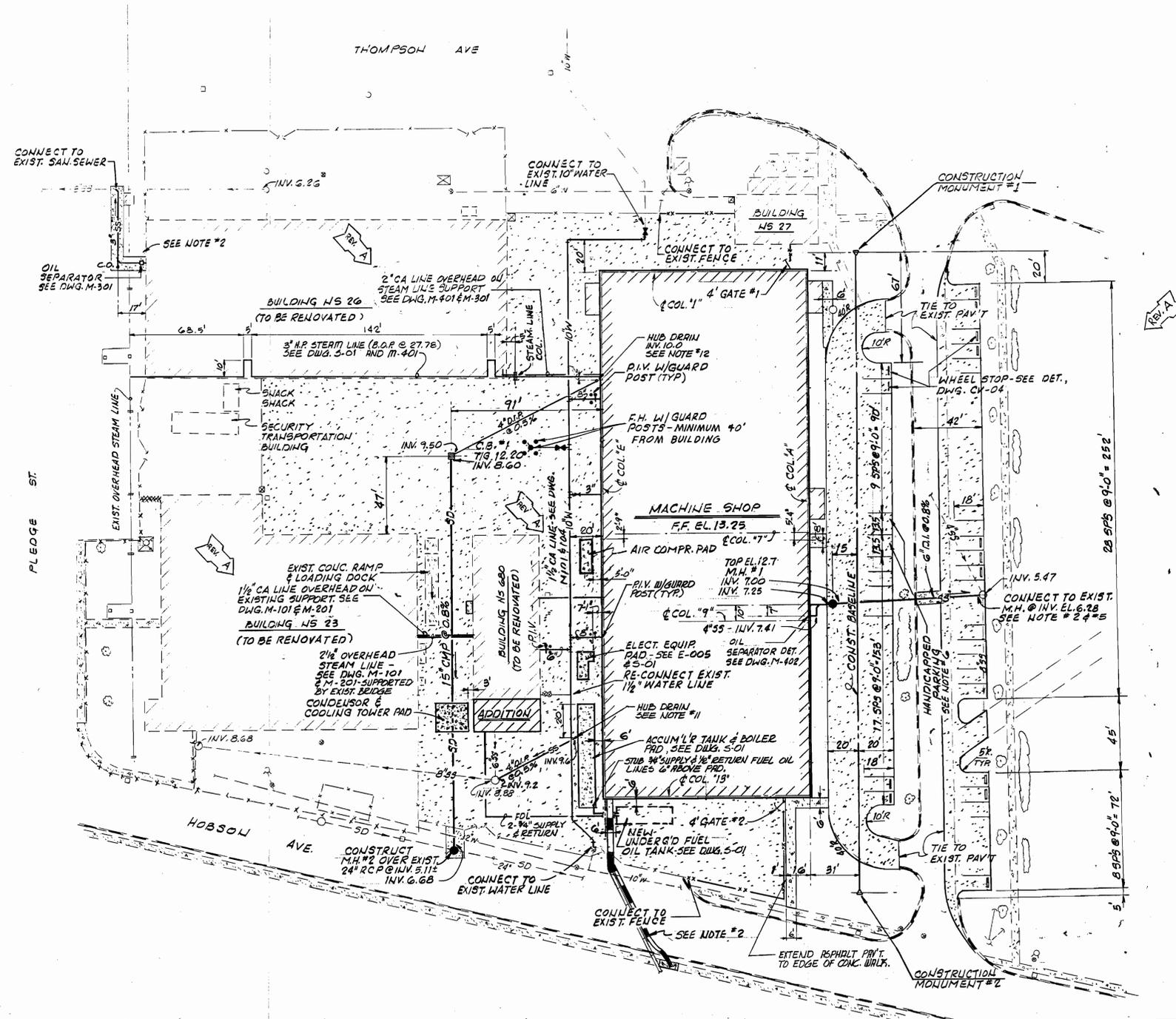
This report contains the information required by the RCRA permit issued to the Navy by the South Carolina Department of Health and Environmental Control and the U.S. Environmental Protection Agency. I certify that the property conditions stated in this report are based on a review of available records, visual inspections, and interviews as noted, and are true and correct, to the best of my knowledge and belief.

 2/23/01

Preparer Signature/Date

*Matthew A. Hunt P.E.
BRAC Environmental Coordinator
Southern Division, Naval Facilities Engineering Command*

REVISIONS				
LET	DESCRIPTION	PREP'D BY	DATE	APPROVED
A	ADDED 1 1/2" & 2" AIR LINES, PARKING, & COMPRESSOR PAD - BUILT CRWG. NO CORRECTIONS	SD	4.19.85	<i>[Signature]</i>
		Cmc	9/85	<i>[Signature]</i>
A	ADDED NEW FENCE	SMW	229-84	RCS



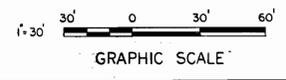
LEGEND	
EXIST.	NEW
SOIL BORINGS.	○
CONTOUR	---(12)---
BUILDING	//////
CATCH BASIN	□
SEWER MANHOLE	○
ELECTRICAL JUNCTION BOX	⊠
FIRE HYDRANT (F.H.)	⊠
WATER VALVE	⊠
UNDERGROUND ELECTRICAL LINE	---
WATER LINE	---W---
CONCRETE	-----
FENCE	---X---
TREE	⊙
SANITARY SEWER	---SS---
TURB & GUTTER CLEAN OUT	---C.O.---
ASPHALT PAVING	-----
SOIL BORING	○
SPOT GRADE	---(13.0)---
POST INDICATOR VALVE (PIV)	⊠
STORM DRAIN	---SD---
FUEL OIL LINE	---FOL---
ELECTRIC DUCT BANK	---

- GENERAL NOTES**
- CONTRACTOR SHALL REFER TO NOTE 5 ON DRAWING CV-01 FOR BASELINE INFORMATION.
 - CONTRACTOR IS RESPONSIBLE FOR REPLACING CURB AND GUTTER, PAVEMENT & WALKWAYS DISTURBED WHEN INSTALLING UNDERGROUND UTILITIES-SEE DETAIL ON DWG. CV-04.
 - CORRUGATED METAL PIPE (CMP) FOR DRAINAGE - FEDERAL SPEC. MW-P-405, CLASS II, SERIES A, COATING TYPE C, GAGE 14.
 - SEE DRAWING CV-01 FOR DEMOLITION.
 - FOR PILE SUPPORTED SEWER LINE & MANHOLE SEE DETAILS ON DWG. 5-01.
 - PROVIDE STANDARD SIGNS FOR HANDICAPPED RESERVED SPACES, AS APPROVED BY SOUTH CAROLINA BARRIER FREE DESIGN MANUAL.
 - SEE ARCHITECTURAL DRAWINGS FOR RENOVATION OF BUILDINGS NS-23, NS-26 AND NS-680.
 - SEE MECHANICAL DRAWINGS FOR CONTINUATION OF PIPES INTO BLDGS.
 - SEE ELECTRICAL DRAWINGS FOR LOCATIONS AND DETAILS OF ELECTRICAL DUCT BANKS.
 - SEE DRAWING CV-03 FOR GRADING.
 - PROVIDE 3" HUB DRAIN FOR CONDENSATE DRAINS. SET TOP OF HUB DRAIN AT 13.0. PIPE BOILER AND ACCUMULATOR BLOW-DOWN TO HUB DRAIN.
 - PROVIDE 3" HUB DRAIN FOR CONDENSATE DRAIN. SET TOP OF HUB DRAIN AT 13.0.
 - FOR DETAILS OF PROJECT CONSTRUCTION SIGN SEE DETAILS ON DWG. CV-05.

FOR OFFICIAL USE ONLY

As-built 11-5-85

LOCKWOOD GREENE ENGINEERS, INC. ARCHITECTS-ENGINEERS SPARTANBURG, S. C.	DEPARTMENT OF THE NAVY NAVAL FACILITIES ENGINEERING COMMAND SOUTHERN DIVISION CHARLESTON, S. C.
DESIGN BY: DR. SURESH CHANDRAN	NAVAL STATION CHARLESTON, S. C.
SUPV: JOHNSTON CH. ENGR. C. K.	S I M A
SUBMITTED BY: DATE: 11/5/85	SITE LAYOUT & OUTSIDE PIPING PLAN - CIVIL
FIRM MEMBER (TITLE): SOUTHERN DIVISION - DESIGN DIVISION	
APPROVED: DATE: 11/5/85	SIZE: CODE IDENT NO.: NAVFAC DRAWING NO. 5077120
OFFICER IN CHARGE: DATE: 11/5/85	F 80091 CONSTR CONTR NO. NS2467-79-C-0028
APPROVED: DATE: 11/5/85	SCALE: AS NOTED SPEC 06-79-0028 SHEET 42 OF



CV-02

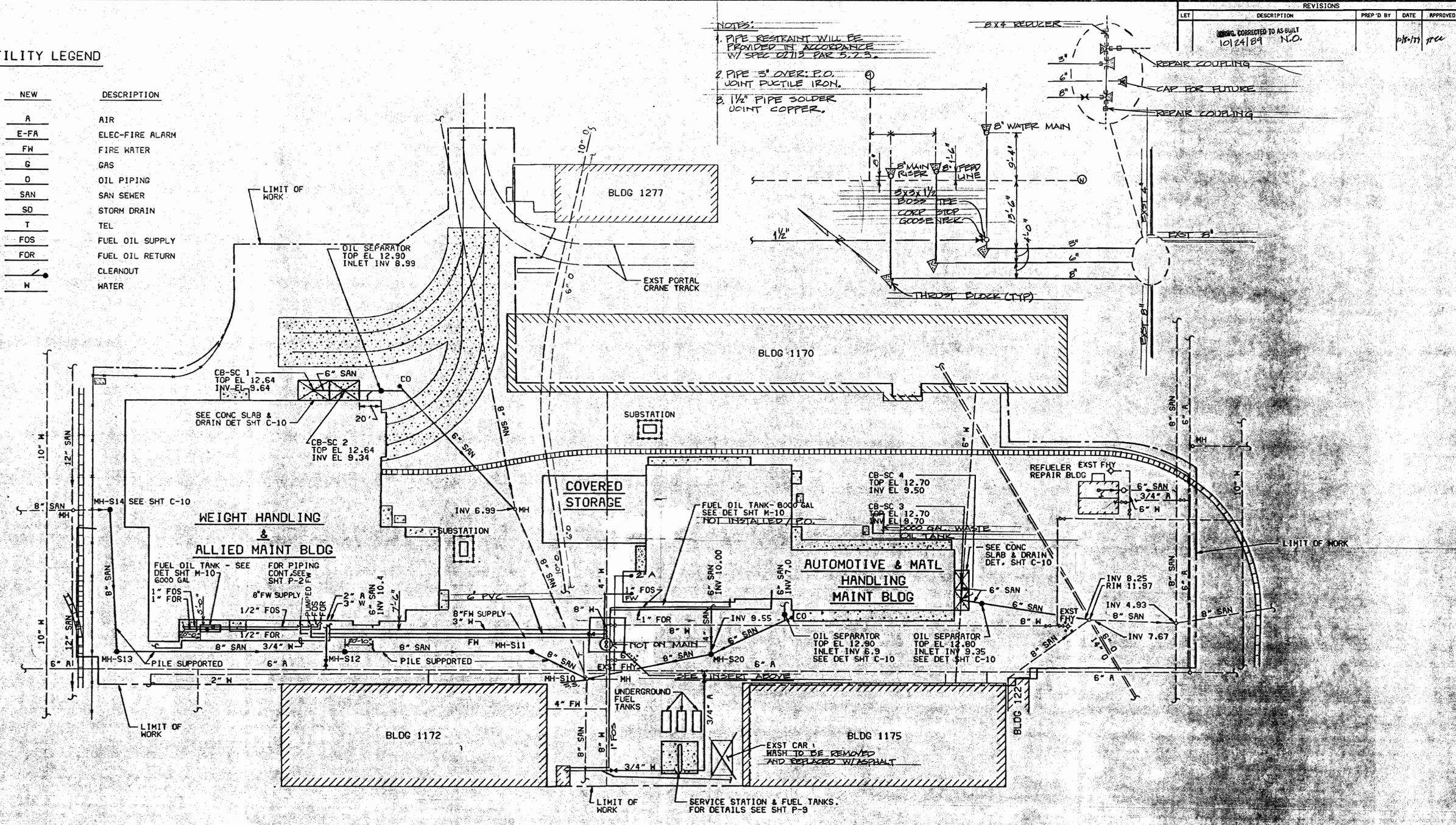


LET	DESCRIPTION	REVISIONS	PREP'D BY	DATE	APPROVED
	AMING CORRECTED TO AS-BUILT			10/24/89	N.O.
					plb/rtj

UTILITY LEGEND

EXISTING	NEW	DESCRIPTION
A	A	AIR
E-FA	E-FA	ELEC-FIRE ALARM
FH	FH	FIRE WATER
G	G	GAS
O	O	OIL PIPING
SAN	SAN	SAN SEWER
SD	SD	STORM DRAIN
T	T	TEL
FOS	FOS	FUEL OIL SUPPLY
FOR	FOR	FUEL OIL RETURN
		CLEANOUT
	M	WATER

- NOTES:**
1. PIPE RESTRAINT WILL BE PROVIDED IN ACCORDANCE W/ SPEC 02113 PAR 5.2.3.
 2. PIPE 3" OVER P.O. JOINT DUCTILE IRON.
 3. 1/2" PIPE SOLDER JOINT COPPER.

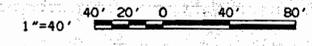


- NOTES:**
1. MIN COVER OVER WATER PIPING SHALL BE 2'.
 2. FOR SAN SEWER PROFILES, SEE SHT C-7.
 3. FOR LEGEND AND ABBREVIATION, SEE SHT G-2.
 4. FOR DETAILS OF WATER AND SEWER APPURTENANCES, SEE SHT C-9 AND C-10.

SITE PLAN - WATER, SEWER AND AIR PIPING

SCALE: 1" = 40'

GRAPHIC SCALE



FOR OFFICIAL USE ONLY

RECORD DRAWING
DATE 10/30/89

HAYES, SEAT, WALTER & WALTER
ARCHITECTS-ENGINEERS-PLANNERS
ROANOKE, VA. ROCKVILLE, MD.

DEPARTMENT OF THE NAVY
SOUTHERN DIVISION
CHARLESTON, S.C.

NAVY SHIPYARD
CRANE/EQUIPMENT MAINTENANCE BUILDING
CHARLESTON, SOUTH CAROLINA

CIVIL
SITE PLAN
WATER, SEWER AND AIR PIPING

APPROVED: [Signature] DATE: 10/24/89
OFFICE IN CHARGE: DATE: 10/24/89
ARCH. & ENGR. SEAL: [Signature]

5113790
CONSTR CONTR NO. NS2467-78-C-0114
SPEC 06-78-0114 SHEET 8 OF 130

RESPONSES TO SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL
CONTROL COMMENTS

Comment 1. Cover Letter

The description of Oil/Water Separators (OWS) AOCs 712, 714 and 715 in the cover letter do not match the description provided in the body of the document. The Department will rely on the description in the document over the cover letter. These discrepancies must be corrected before the referenced document can be approved.

Cover Letter

- 712 Waste Oil Tank at Facility 240*
- 714 Waste Oil Tank at Facility 242*
- 715 Waste Oil Tank at Facility 681*

Body of the Document

- 712 Oil/Water Separator and Waste Oil Tank at Facility 240*
- 714 Oil/Water Separator at Facility 242*
- 715 Oil/Water Separator at Facility 681*

Response:

The Navy concurs that the forwarding letter did provide incorrect descriptions. The descriptions in the final cover letter will match those in the body of the document

Comment 2. Cover Letter

The body of the document describes two Oil/Water Separators at AOCs 714 and 715. Each OWS should be assigned a separate AOC number. The reason to assign separate AOC numbers is to avoid confusion in the event that one of the OWS is not contaminated (NFA) and the other one OWS is contaminated (RFI) and requires assessment and remediation. This must be corrected before this document can be approved. The Department understands by a 30 January 2001 telephone call with Mr. Tony Hunt that separate AOC numbers will be assigned and a revised document will be submitted.

Response:

The Navy concurs, AOC 717 and AOC 718 will be added which will split the two OWSs at AOC 714 and 715 into separate sites

Comment 3. Information provided in the Report.

The information provided in the Report followed the pattern described in Permit condition II.B.2. The information, however, focused more on the building associated with the OWS and did not specifically address the OWS. This information is critical to understanding and evaluating each site in order to determine the path forward. A revised RFA (AR) document is not necessary to proceed however this information must be included in the CS workplan:

1. SITE IDENTIFICATION.

Tanks and OWS at the Naval Complex routinely received a unique identification number from the Navy. Information such as this should be included in this section to allow for cross referencing with UST registrations and Tank closure reports.

An important reason for careful site identification is that the Navy would routinely labeled an OWS as a UST. Cross labeling has generated much confusion and has resulted in cases of OWSs receiving a partial sample analysis.

4. GENERAL DIMENSIONS, CAPACITIES AND STRUCTURAL DESCRIPTIONS OF UNIT(S) (SUPPLY ANY AVAILABLE PLANS/DRAWINGS).

This section should include information describing the volume, construction materials, general condition (i.e., cracks, deteriorated concrete, damaged piping, loose or damaged joints, etc.), buildings or areas served, piping runs, sinks, solvent vats, floor drains, sewer lines, associated USTs or any other relevant information.

This section should also provide detailed scaled sketches, as built drawings maps or figures to show the location of the OWS as well as any USTs, SUMUs, AOCs and/or monitoring wells in relation to the OWS being described.

5. DATES THE UNIT(S) WAS(WERE) OPERATED.

This section could compare the age of the OWS to the age of the facility the OWS served.

This section could also indicate when tanks were closed and reference the closure report and the status of that report. For example, a document dated August 2000 AOC/SWMU and UST cross reference list indicates that tanks from the following Facilities were removed/demolished. This information should be included.

<i>Building -0200</i>	<i>UST NS200</i>
<i>Building 0240</i>	<i>UST 240</i>
<i>Building 0241</i>	<i>UST 02-241-001</i>
<i>Building 0242</i>	<i>UST 242</i>

Building 0681 UST 681-1
Buildings 0681 and 0680 UST 681-2

6. SPECIFICATION OF ALL WASTES THAT HAVE BEEN MANAGED AT/IN THE UNIT(S) TO THE EXTENT AVAILABLE. INCLUDE ANY AVAILABLE DATA ON R.61-79.261, APENDIX VIII CONSTITUENTS CONTAINED IN THE WASTES.

This section should list all the known and suspected contaminants which most likely would be found in an OWS. Information relating to issues such as floor drain discharge (AOC 713) (AOC 714) or evidence of disposal into floor drains (AOC 715) should be addressed in item numbers 4 and 7 respectively.

7. ALL AVAILABLE INFORMATION PERTAINING TO ANY RELEASE OF HAZARDOUS WASTE OR HAZARDOUS CONSTITUENTS FROM SUCH UNITS(S) (TO INCLUDE GROUNDWATER DATA, SOIL ANALYSES, AIR, AND/OR SURFACE WATER DATA).

This would be the area to summarize all contaminants detected from analytical sampling collected from the AOC in question or from a nearby SWMU or AOC RFI or a UST assessment.

8. RECOMMENDATIONS

Without proof or conclusive documentation, there is every reason to suspect that wastes were disposed of in the OWS.

Existing wells and suitable field screening methods may be utilized only if deemed appropriate and equal to RFI quality sampling and analysis. Such decisions will be made on a site by site basis.

Response:

Concur, to extent that the data is available it will provided in the CSI report for each AOC.

Comment 4. The Department is willing to scope the CS workplan and to conduct site visits with the Navy in order to speed the review and approval of the CS workplan.

Response:

Concur, the Navy and its contactors will use the BCT to coordinate with the Department.

Comment 5. Comments on individual sites will not be provided because of the general issues presented above are common throughout this RFA (AR).

Response:

Comment noted

RESPONSES TO SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL COMMENT

South Carolina Department of Health and Environmental Control comments on: RCRA Facility Assessment (RFA) Volume VI for Area of Concern (AOC) 711 through 716, located in Charleston Naval Complex (CNC), SCO 170 022 560, Revision 0, dated December 2000, received December 27, 2000.

Comments by Mihir Mehta:

Comment 1.

Please provide detail information regarding physical features of the surrounding area, physical specification and configuration of the OWS/Waste Oil Tank, and other pertinent information related to the past Navy operations for referenced AOCs.

Response:

The Navy has provided photos and a written description each site. When details of the OWS are discovered, they will be provided in the follow-up documents.

Comment 2.

The referenced document recommends the use of existing groundwater wells in the nearby vicinity of the AOC. Please note that the concurrence of this recommendation is deferred during the review and approval of the individual CS work plans. The CS work plans should justify the selection of appropriate groundwater wells.

Response:

The Navy concurs that only wells that in close proximity are suitable. The Navy wants to reduce the number of wells that are in very close proximity to each other, when an existing well will provide the same information.

Comment 3.

The CS work plan should investigate the "source" and "release to media" scenario for each individual AOCs. The source investigation at a minimum should include the sampling the contents of OWS, Waste Oil Tank, etc and their connection to sewer systems or other outfalls. The media (surface and subsurface soils) adjacent to the source(s) should be investigated, especially where there are joints or known or observed cracks. The overall intent is to understand the site in order to streamline the investigation to meet the objectives of CS work plan.

Responses:

The Navy concurs that CS Work Plan should be based on solid scientific data.

Comment 4. The Department is amenable to participate in site visits and scoping efforts for the CS work plans with Navy and their contractor if deemed appropriate.

Response:

The Navy concurs and will continue to use the team approach in investigation AOCs.

The Department acknowledges the discovery of six new AOCs and consistent with the CNC RCRA Permit, these sites will be designated as AOCs 711 through 716 and will be included in the next permit modification for the Permit.

The referenced Report recommends confirmatory sampling (CS) for all six AOCs and the Department concurs with the proposed recommendation. In accordance with the CNC-RCRA Permit Condition II.D.1. the Navy should submit a confirmatory sampling (CS) work plan for each AOC within forty five (45) calendar days of the receipt of this letter.