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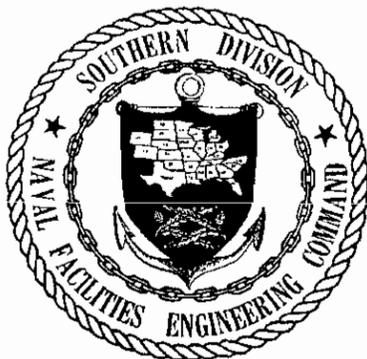
ENVIRONMENTAL COMPLIANCE EVALUATION CNC CHARLESTON SC
10/1/1996
NAVFAC SOUTHERN



ENVIRONMENTAL COMPLIANCE EVALUATION

CHARLESTON NSY/FISC/NS BRAC FACILITY CHARLESTON, SC

OCTOBER 1996



Southern Division
Naval Facilities Engineering Command
Charleston, South Carolina 29419-9010

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INTRODUCTION

Location/Mission: The Charleston Naval Shipyard (NSY), Fleet and Industrial Supply Center (FISC), and (NS) Naval Station is located in Charleston County, South Carolina. The facilities were operationally closed in April of 1996. The existing facilities are under the care of the Charleston Caretaker Site Office (CSO). The mission of the existing Naval presence is to maintain the property until future disposal by transfer to either government or private entities.

Background: The ECE program is a CNO initiative to identify activity environmental compliance deficiencies, provide recommendations for corrective action, and establish a basis for future budgets. ECEs are being performed Navy-wide over a three year cycle to identify overall environmental compliance trends, funding requirements, and resource needs.

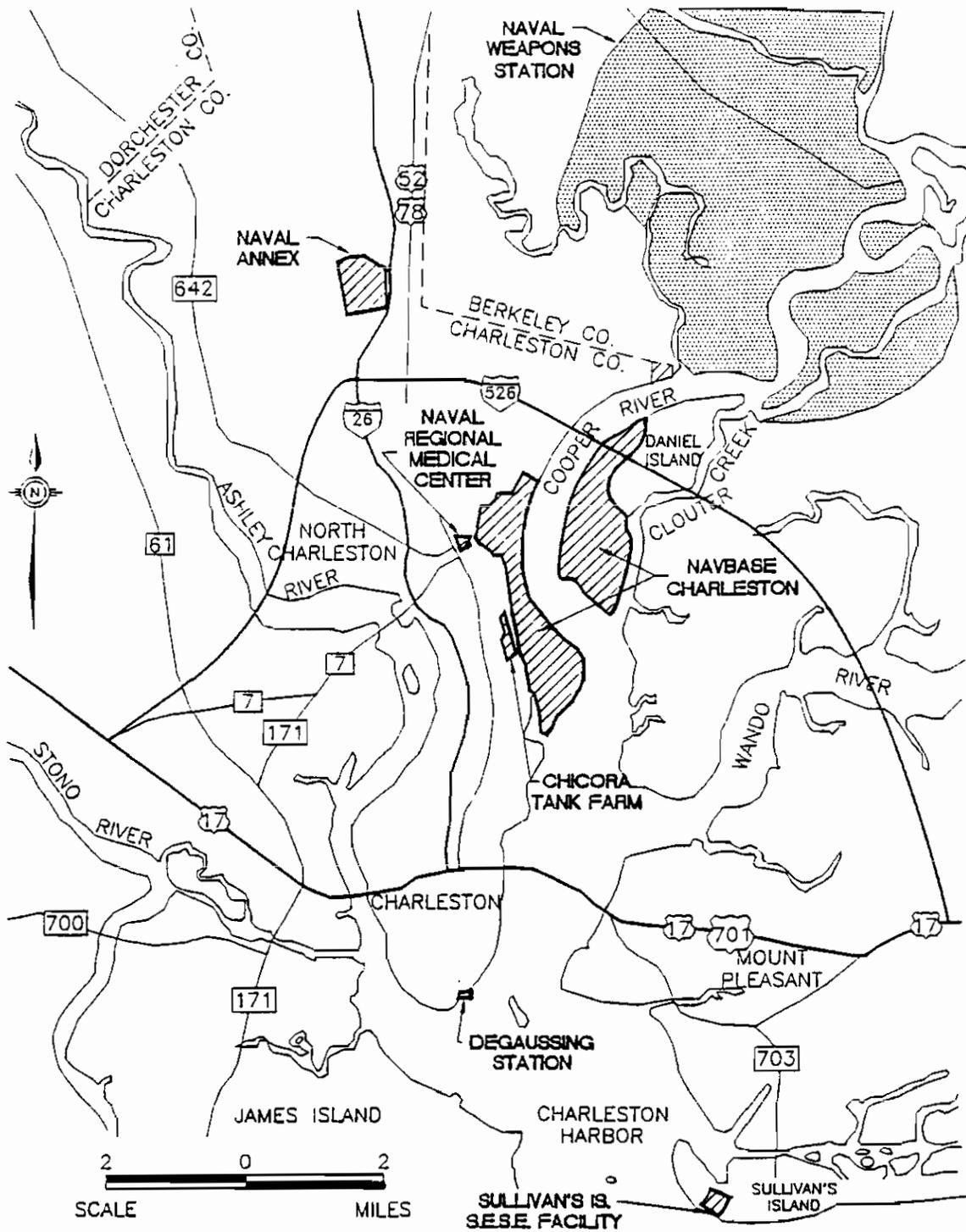
The ECE program is a three-tier program which includes an annual self-audit, the "Tier II" ECE audit (conducted once every three years), and a follow-up IG inspection. The Tier II ECE audit is an on-site evaluation performed by the major claimant with technical support from the responsible engineering field division (EFD).

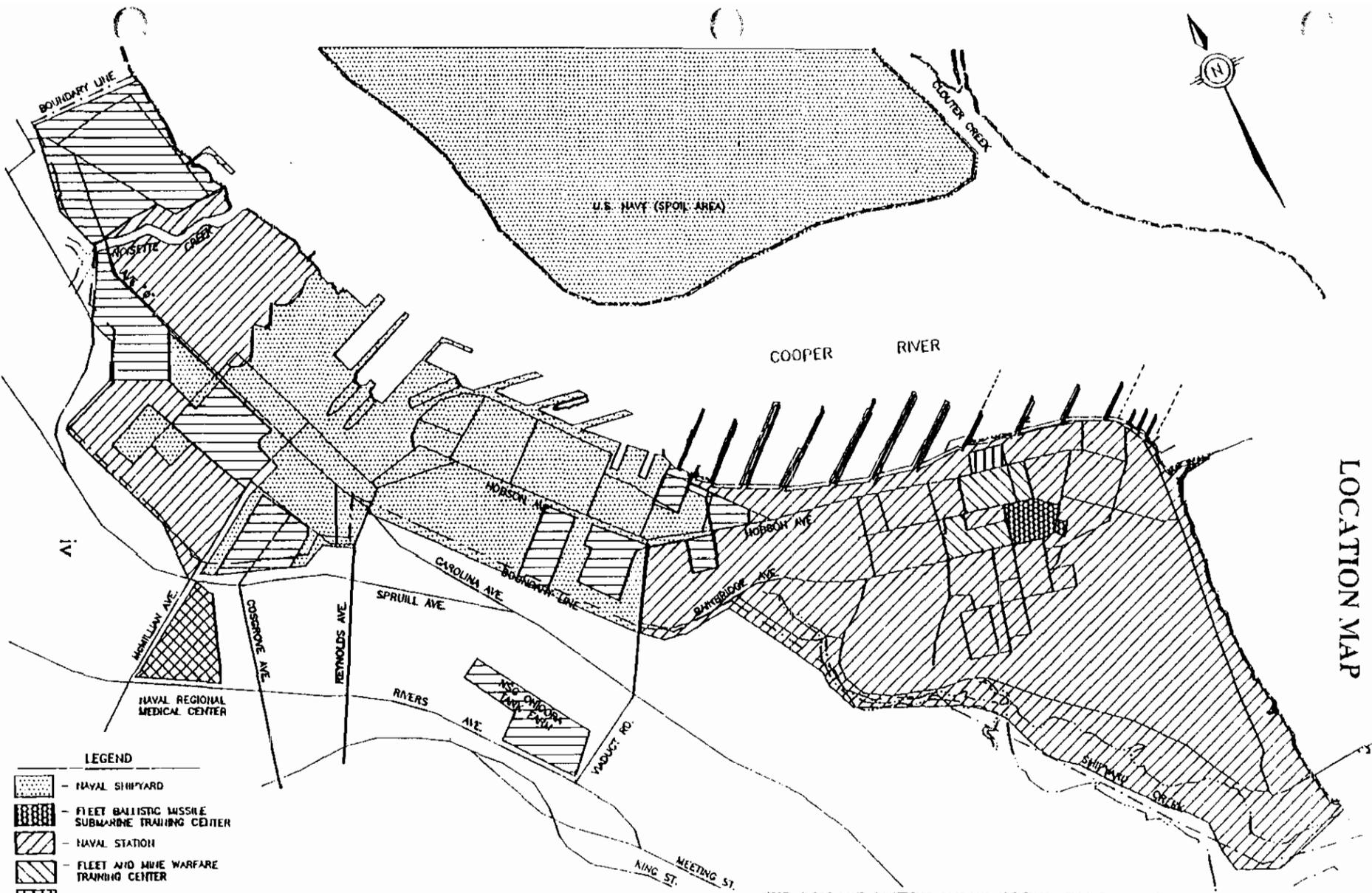
The ECE report is prepared by the EFD team and forwarded to the major claimant for review. The major claimant is responsible for concurrence with the identified recommendations, adding resource related findings and recommendations, and submitting the final report to the activity with copies to the Regional Environmental Coordinator (REC) and NAVFACENGCOCM.

This ECE was conducted under the direction of the NAVFAC claimancy program. Per direction of the major claimant, the ECE team focussed primarily upon the properties under the direct responsibility of the CSO. Additional issues were addressed as necessary.

ECE Report Format: Following "NAVFAC Guidance for Conducting Major Claimant Tier II Environmental Compliance Evaluations" (OCT 94), the ECE report consists of the introduction, an executive summary, a section of findings and recommendations, and a completed ECE Checklist of Federal Regulations and Navy Policy. For each checklist entry annotated with a "NO" and a corresponding finding number, the Findings and Recommendations sections contains a statement of deficiency, as well as recommended action to correct the identified deficiency. General recommendations which are denoted by "GEN" are not deficiencies of any regulations, but are provided as the team's guidance for best management/engineering practice.

VICINITY MAP





LOCATION MAP

LEGEND

-  - NAVAL SHIPYARD
-  - FLEET BALLISTIC MISSILE SUBMARINE TRAINING CENTER
-  - NAVAL STATION
-  - FLEET AND NAVAL WARFARE TRAINING CENTER
-  - NAVAL RESERVE CENTER
-  - FLEET AND INDUSTRIAL SUPPLY CENTER
-  - NAVAL REGIONAL MEDICAL CENTER

SOURCES: SOUTHDM, n.d. ESE, 1981.

NOTE: THESE LAND OWNERSHIP DIMENSIONS ARE THOSE EFFECTIVE IN 1978



DWG DATE: 03/05/94

EXECUTIVE SUMMARY
ENVIRONMENTAL COMPLIANCE EVALUATION
CHARLESTON NSY, FISC, NS
CHARLESTON, SOUTH CAROLINA
OCTOBER 1996

Southern Division Naval Facilities Engineering Command (SOUTHDIV) conducted an Environmental Compliance Evaluation (ECE) of the Charleston Naval Shipyard (CNSY), Fleet and Industrial Supply Center (FISC), and Naval Station (NS) during the week of October 28- 31, 1996. This ECE was conducted at the request of the activity's major claimant, Commander Naval Facilities Engineering Command (COMNAVFACENGCOM). Per direction of the major claimant, the ECE team focussed primarily upon the properties under the direct responsibility of the Caretaker Site Office (CSO). The purpose of the evaluation was to provide the major claimant and the activity with a comprehensive evaluation of the activity's compliance posture with Federal and State environmental laws and regulations as well as Navy environmental policy.

In general the environmental programs for the activity are in good condition. CSO environmental staff are knowledgeable of their program areas, well organized, and provide excellent environmental support, especially in consideration of the scope of their responsibilities.

A total of twenty-two (22) environmental program areas were considered for evaluation by the ECE team. Nineteen (19) deficiencies were identified with a summary of the findings provided below. In addition to the findings and recommendations, there are general recommendations included in the report which are suggested as Best Management Practices and should improve overall operations of the facility.

AIR: No findings were identified in this program area. Except for the boilers, all Naval air emission sources have ceased operations. CSO is negotiating with the South Carolina Department of Health and Environmental Control (DHEC) the status of the Boiler Air Operating Permits.

ASBESTOS: No findings were identified in this program area. A formal method has been developed and is in operation to track asbestos work by non-Department of Navy activities.

CULTURAL RESOURCES: No findings were identified in this program area. CSO is aware of all pertinent requirements and obtains support from SOUTHDIV main office as necessary.

EPCRA: The annual EPCRA reporting is no longer required due to base closure. At this time, the facility does not store or expect to store hazardous materials in excess of threshold quantities.

HAZARDOUS MATERIALS: One (1) finding was noted. The Authorized Use List should be updated to meet the requirements of OPNAVINST 4110.2 encl (2) 2.b.

HAZARDOUS WASTES: Four (4) findings were noted. One finding concerned training records. One finding occurred under the Preparedness and Prevention Section of 40 CFR 265 concerning the testing and maintenance of fire extinguishers. Two findings were noted for the Hazardous Waste Contingency Plan for building 1824.

(HAZARDOUS WASTES) POLLUTION PREVENTION (P2): Per OPNAVINST 5090.1B, the development and implementation of a P2 plan/initiative is not required for bases closing by December 1997.

INFECTIOUS WASTES: No findings were noted -- an audited checklist is not provided for this media area. All Naval operations at Charleston NSY/FISC/NS that generate infectious wastes have ceased.

NATURAL RESOURCES: No findings were noted -- an audited checklist is not provided for this media area. Although a Natural Resource Management Plan was developed for the operational facility, a NRMP is not required. Any natural resources concerns are coordinated with SOUTHDIV main office.

NEPA: No findings were identified in this program area. All necessary documentation has been prepared or is being prepared for the closure of this facility. As this is a closing facility, no further activities are expected to necessitate compliance with NEPA requirements.

NOISE: No findings were identified in this program area.

OIL AND HAZARDOUS SUBSTANCES: Two (2) findings were identified in this program area. All major bulk tanks will be completely out of service within the next two months. This will occur when the main bulk tank manifold, located at Pier K, will have a pancake flange installed. This will disable all bulk tanks inside and outside the shipyard fence line (i.e. Chicora tank farm). Chicora tank farm has been given closure status by the state. All but one main bulk tank within the fence line has been cleaned, but all are empty, so from a practicality standpoint all main bulk tanks at Charleston that the Navy has not leased have been removed from service. Once the pancake flange has been installed at Pier K, the storage volumes of the bulk tanks within the fence line can be subtracted from the Navy's total storage capacity at Charleston. Once this occurs then Charleston no longer exceed the oil storage threshold requirements which currently forces Charleston to comply with Oil Pollution Act 1990 (OPA 90) requirements.

PCB's: No findings were noted in this program area. Charleston NSY/FISC/NS has verified the PCB status of equipment and spills. Known PCB spills are to be cleaned up to negotiated standards.

PESTICIDES: No findings were noted -- an audited checklist is not provided for this media area. The CSO is under a cooperative agreement with the Redevelopment Authority (RDA) to provide pest control services; therefore the compliance requirements are not applicable.

POLICY: No findings were identified in this program area. The CSO is largely in compliance with Navy program management policy. The CSO environmental staff is comprised of two (2) environmental engineers and three (3) engineering technicians who report directly to the supervisory environmental engineer. The CSO environmental staff responsibilities include air, water, PCB, hazardous waste, asbestos, and inspections.

The CSO staff seeks technical assistance from SOUTHDIV Code 18. In addition, approximately 50% of the CSO environmental compliance budget is dedicated to compliance support that is provided by the Shipyard Environmental Detachment. This support includes hazardous waste (HW) management, asbestos abatement, clean-up, and tank removal.

There are approximately thirty (30) RDA subtenants, seven (7) Federal tenants, and six (6) Federal landowners. The CSO provides limited oversight of its tenant by conducting periodic site visits and routine “drive-by” inspections. Although the CSO desires to ensure and maintain 100% compliance, the CSO is not staffed to perform detailed, routine tenant oversight.

The CSO maintains permits to support its operations, including NPDES permits, wastewater permit, air permit (for operations and construction), Title V Air Permit, and a HW EPA generator ID number. Tenants maintain their own permits.

POTABLE WATER: Two (2) findings were noted for this program area. Total coliform sampling has not been performed since February 1996. The sampling plan indicates one sample is to be collected, but two are required based on the population served by the potable water system. Coliform sampling shall continue and the sampling plan revised to indicate the correct sampling frequency. Backflow preventors within the base complex are not inspected or tested.

RADON: No findings were noted -- an audited checklist is not provided for this media area. Per DoD policy, the radon results are available.

SPCC: Three (3) findings were identified in this program area. These findings are primarily attributable to the Detachment fueling operations.

SOLID WASTE: No findings were noted -- an audited checklist is not provided for this media area. Solid Waste management for the CSO is handled under a cooperative agreement with the Charleston Naval Complex.

UNITED STATES COAST GUARD REGULATIONS: No findings were noted -- an audited checklist is not provided for this media area as Charleston NSY/FISC/NS no longer engage in over-water oil transfers that would require such compliance.

UNDERGROUND STORAGE TANKS (UST's): NAVBASE Charleston is doing a good job managing the UST program; however, seven (7) findings were noted during the evaluation. These findings involve a total of five tanks (FBM 61-2, 681-1, 38-1, 1346, and 242). Four

findings will go away with the removal of tanks FBM 61-2, 681-1 and 38-1. These tanks are scheduled for removal during first quarter 1997. Findings found are as follows:

Releases are not being monitored at tanks FBM 61-2, 681-1 and 38-1. As a result, the required release detection records for these tanks are not being maintained. These tanks are scheduled to be removed during first quarter 1997. In addition, tanks 681-1 and FBM 61-2 are not registered with the state agency.

The underground piping for tank 242 is not protected from corrosion.

The monitoring system of tank 1346 is not turned on.

The fill line for tank 242 and three UST's at building 1346 are not secured.

WASTEWATER: No findings were noted for the wastewater program. However, a general recommendation has been provided. Since industrial operations have ceased at Charleston NSY/FISC/NS, a request to be withdrawn from the NPDES Permit for Storm Water Discharges Associated with Industrial Activity should be sent to the Department of Health and Environmental Control.

ECE MEDIA RESULTS REPORT

ACTIVITY: CHARLESTON NSY/FISC/NS

Date: 10/28/96 TO 10/31/96

PROGRAM	GROUP	YES	NO	N/A	N/R	GEN	TOTAL
AIR	AIR	4	0	5	0	0	9
ASB	ASB	12	0	9	0	0	21
CR	CR	10	0	6	1	0	17
EPCRA	EPCRA	0	0	6	0	0	6
HMC&M	HMC&M	21	1	3	0	0	25
HWASTE	HW90	22	4	44	0	0	70
HWASTE	HWB	1	0	111	0	0	112
HWASTE	HWLQG	23	0	17	1	0	41
HWASTE	HWOIL	8	0	23	0	0	31
IR	IR	16	0	10	0	0	26
NEPA	NEPA	9	0	0	0	0	9
OHS	OHS	24	2	12	5	1	44
PCB	PCB	4	0	55	0	0	59
POLICY	POLICY	13	0	0	7	0	20
PW	PW	14	2	94	0	1	111
SPCC	SPCC	4	3	5	17	1	30
UST	UST	33	7	11	0	0	51
WW	WW	20	0	38	0	1	59
Total:		238	19	449	31	4	741

ECE FINDINGS
CHARLESTON NSY/FISC/NS

Program: HMC&M
Auditor: JAMES WORTHY
PANO KORDONIS

Date: 10/28/96 TO 11/01/96

FINDING
NUMBER

FINDING

HMC&M 001

OPNAVINST 4110.2 encl (2) 2.b requires the AUL include the location where hazardous materials are used and stored, disposal requirements, quantity normally on hand, stock number, and the chemical name.

The current AUL does not include the location where the chemicals are used and stored or the disposal requirements.

ECE FINDINGS
CHARLESTON NSY/FISC/NS

Program: HWASTE
Auditor: JAMES WORTHY
PANO KORDONIS

Date: 10/28/96 TO 11/01/96

FINDING NUMBER	FINDING
HW 001	<p>Per 40 CFR 265.16 (d), the following documents and records are required to be maintained at the 90 day storage area:</p> <ul style="list-style-type: none">- job title for each position at the facility and the name of the person filling it;- a written job description for each of the positions;- a written description of the type and the amount of training needed for each position; and- records documenting that the training has been given to, and completed by personnel. <p>The records and files for the personnel who work at the 90 day storage facility, Building 1824, did not contain all of the information required by 40 CFR 265.16(d).</p>
HW 002	<p>40 CFR 265.33 requires equipment used to minimize the possibility of fire, explosion, or any sudden release to the environment be tested/maintained to assure proper operation.</p> <p>The fire extinguishers in Building 1824 have not been tested or maintained to ensure proper operation.</p>
HW 003	<p>40 CFR 265.52 requires each facility to have a Hazardous Waste Contingency Plan, and that the plan contain certain facility specific descriptions relating to emergency procedures.</p> <p>The facility does not have an updated Contingency Plan which includes Building 1824.</p>
HW 004	<p>40 CFR 265.53 requires that the Hazardous Waste Contingency Plan be maintained at the facility, and submitted to local agencies.</p> <p>The facility does not have a current Contingency Plan and the plan has not been submitted to the local agencies.</p>

ECE FINDINGS
CHARLESTON NSY/FISC/NS

Date: 10/28/96 TO 10/31/96

Program: OHS
Auditor: GENE SANTOS

FINDING NUMBER	FINDING
OHS 001	40 CFR 300.150 states that response contracts must identify requirement for compliance with 29 CFR 1910.120 and other pertinent OSHA regulations. Review of Fenn Vac contract did not reveal these requirements.
OHS 002	40 CFR 112 regulation for identifying temporary storage is not in compliance.

ECE FINDINGS
CHARLESTON NSY/FISC/NS

Date: 10/28/96 TO 10/31/96

Program: PW
Auditor: MICHAEL PATE

FINDING NUMBER	FINDING
PW 001	40 CFR 141.21(a)(2) requires that total coliform samples be collected based on the population served by the potable water distribution system. Total coliform sampling has not been performed at Charleston NSY/FISC/NS since February 1996. The existing sample siting plan indicates one sample per month had been taken until February 1996. Presently the population has increased to an estimated 2,000, which requires a minimum of two samples to be collected.
PW 002	OPNAVINST 5090.1B and the South Carolina Primary Drinking Water Regulations require that existing backflow preventors be inspected and tested on a routine basis. The backflow preventors on the main feed lines into the Charleston Base Complex are inspected and tested by personnel with the Commissioners of Public Works. However, the backflow preventors within the base are not inspected or tested.

ECE FINDINGS
CHARLESTON NSY/FISC/NS

Date: 10/28/96 TO 10/31/96

Program: SPCC
Auditor: GENE SANTOS

FINDING NUMBER	FINDING
SPCC 001	There is no single current plan. There are currently three plans for this activity as there were three different command associated with the subject properties. These are in the process of being combined; see gen comment 1. Two of the three plans are out of date for review.
SPCC 002	Currently detachment is using a mobile fueler and mobile tanks to remove fuel during tank closure. These tanks are not being maintained in bermed areas when not in use.
SPCC 003	The only fueling taking place under the Navy cognizance is where the detachment pumps fuel from a tank to the mobile fueler or from the tank being removed to a mobile tank.

ECE FINDINGS
CHARLESTON NSY/FISC/NS

Program: UST
Auditor: GABE MAGWOOD
BEVERLY WASHINGTON

Date: 10/28/96 TO 10/31/96

FINDING NUMBER	FINDING
UST 001	40 CFR 280.20 (b) requires that the piping on new UST systems be protected from corrosion. Tank 242 has steel piping that is not cathodically protected. The soil at Tank 242 has not been determined by a corrosion expert to be non corrosive.
UST 002	40 CFR 280.22 requires that existing USTs and USTs taken out-of-service after 1 January 1974 be registered with the proper state agency. Tank FBM 61-2 and tank 681-1 are waste oil tanks and are not registered with the state agency.
UST 003	40 CFR 280.34(b) requires owners and operators maintain records of recent compliance with release detection requirements. Release detection records are not being maintain for the waste oil tanks FBM 61-2, 681-1 and 38-1. This is a result of the absence of release detection methods/procedures for these tanks.
UST 004	40 CFR 280.40(a) requires that UST systems be provided with a method of release detection. Tanks FBM 61-2, 681-1 and 38-1 do not have methods of release detection.
UST 005	40 CFR 280.41(a) requires that tanks be monitored at least every 30 days for releases using methods listed in 40 CFR 280.43. Releases are not monitored every 30 days at tanks FBM 61-2, 681-1 and 38-1.
UST 006	40 CFR 280.70(a) requires operation and maintenance of corrosion protection and release detection systems continued when a UST system is temporarily closed. The monitoring system at building 1346 is not turned on.
UST 007	40 CFR 280.70(b) requires that lines, pumps, manways and ancillary equipment of temporarily closed UST systems be secured. The fill line for

ECE FINDINGS
CHARLESTON NSY/FISC/NS

Program: UST
Auditor: GABE MAGWOOD
BEVERLY WASHINGTON

Date: 10/28/96 TO 10/31/96

FINDING
NUMBER

FINDING

UST 007 (Continuation)
tank 242 and three UST's at building 1346 are not
secured.

ECE RECOMMENDATIONS
CHARLESTON NSY/FISC/NS

Program: HMC&M
Auditor: JAMES WORTHY
PANO KORDONIS

Date: 10/28/96 TO 11/01/96

FINDING NUMBER	RECOMMENDATION
HMC&M 001	The AUL should be updated to meet the requirements OPNAVINST 4112.2 encl (2) 2.b.

ECE RECOMMENDATIONS
CHARLESTON NSY/FISC/NS

Program: HWASTE
Auditor: JAMES WORTHY
PANO KORDONIS

Date: 10/28/96 TO 11/01/96

FINDING NUMBER	RECOMMENDATION
HW 001	The records for the personnel who work at the 90 day storage facility should be updated to include all requirements of 40 CFR 265.16(d).
HW 002	To meet the requirements of 40 CFR 265.33, it is recommended that the fire extinguishers be tested/maintained to ensure proper operation. The facility should also maintain records of these tests.
HW 003	The facilities Contingency Plan is currently under revision and has pen and ink changes, which include up to date facility personnel. It is recommended that the plan be finalized as soon as possible to meet the requirements of 40 CFR 265.52.
HW 004	To meet the requirements of 40 CFR 265.53, the facility should finalize the Contingency Plan and submit it to local agencies.

ECE RECOMMENDATIONS
CHARLESTON NSY/FISC/NS

Date: 10/28/96 TO 10/31/96

Program: OHS
Auditor: GENE SANTOS

FINDING NUMBER	RECOMMENDATION
OHS 001	See OHS General Comment 1.
OHS 002	See OHS General Comment 1.
GEN 001	All major bulk tanks will be completely out of service within the next two months. This will occur when the main bulk tank manifold, located at pier K, will have a pancake flange installed. This will disable all bulk tanks inside and outside the shipyard fence line (i.e. Chicora tank farm). Chicora tank farm has been given closure status by the state. All but one main bulk tank within the fence line has been cleaned, but all are empty, so from a practicality standpoint all main bulk tanks at Chasn that the Navy has not leased has been removed from service. Once the pancake flange has been installed at pier K, the storage volumes of the bulk tanks within the fence line can be subtracted from the Navy's total storage capacity at Chasn. Once this occurs then Chasn will no longer exceed the oil storage threshold requirements which currently forces Chasn to comply with OPA 90 requirements.

ECE RECOMMENDATIONS
CHARLESTON NSY/FISC/NS

Date: 10/28/96 TO 10/31/96

Program: PW
Auditor: MICHAEL PATE

FINDING NUMBER	RECOMMENDATION
PW 001	Coliform sampling shall continue and a minimum of two samples shall be collected each month. The sampling plan shall be revised to indicate the correct sampling frequency. (See General Recommendation 001)
PW 002	A field audit of the existing backflow preventors, the buildings they serve and the original cross-connection source should be accomplished. With the base closure, much of the operations and processes that had required backflow preventors have ceased. Where the source of the cross-connection no longer exists, the backflow preventor does not need to be inspected and tested. Where a determination of the operations cannot be made or the operations are still functioning, the preventors shall be inspected, tested and maintained.
GEN 001	40 CFR 141.21(a)(1) requires that the sampling siting plan for total coliform have monitoring frequency based on the population served by the system. The plan indicates that one sample is performed each month; however, two samples are required based on the population. The plan shall be revised. (See Finding PW 001)

ECE RECOMMENDATIONS
CHARLESTON NSY/FISC/NS

Date: 10/28/96 TO 10/31/96

Program: SPCC
Auditor: GENE SANTOS

FINDING NUMBER	RECOMMENDATION
SPCC 001	Wait to update plan until Pier K manifold has been blanked so that the major bulk tank facilities will not have to be addressed.
SPCC 002	Find or develop a bermed area for storage of mobile tanks and the mobile fueler, which the detachment can use.
SPCC 003	Develop or find a bermed area where the mobile fueler may be placed during fueling of the main tank on the mobile fueler.
GEN 001	In the very near future, major bulk tanks will no longer pose a threat to surrounding waters. See General Comment 1 of the OHS section. The current SPCC plan, although technically out of compliance, will have to have a major update due to the new closure status of all major bulk tanks. Recommend SPCC update be postponed until Pier K has been blanked and letters sent to EPA Region IV and Coast Guard COTP Chasn has been sent notifying of new status.

ECE RECOMMENDATIONS
CHARLESTON NSY/FISC/NS

Program: UST
Auditor: GABE MAGWOOD
BEVERLY WASHINGTON

Date: 10/28/96 TO 10/31/96

FINDING NUMBER	RECOMMENDATION
UST 001	40 CFR 280.20 (b). Perform line tightness test on piping for tank 242 to ensure piping is not leaking. Lines should be pnuematically tested to 50 psi and held for a minimum of two hours. No drop in pressure is allowed. If line tightness test is satisfactory, provide cathodic protection for the steel piping, or replace steel piping with piping constructed of fiberglass-reinforced plastic.
UST 002	(40 CFR 280.22). Tank 681-1 should be permanently closed because it is not in use and not registered with the state agency. Tank FBM 61-2 should be permanently closed because it is not registered with the state agency. Upgrading these tanks to meet all current and future regulatory requirements will not be feasible.
UST 003	Tanks FBM 61-2, 681-1 and 38-1 should be permanently closed. Meeting of all current and future UST requirements will not be feasible.
UST 004	Tanks FBM 61-2, 681-1 and 38-1 should be permanently closed. Meeting of all current and future requirements will not be feasible.
UST 005	Tanks FBM 61-2, 681-1 and 38-1 should be permanently closed. Meeting of all current and future requirements will not be feasible.
UST 006	40 CFR 280.70(a). Ensure power to the monitoring system is turned on. Test the system to ensure it is operational and functioning properly.
UST 007	40 CFR 280.70(b). The fill line for tank 242 and the three tanks at building 1346 should be secured with a locking device.

ECE RECOMMENDATIONS
CHARLESTON NSY/FISC/NS

Date: 10/28/96 TO 10/31/96

Program: WW
Auditor: MICHAEL PATE

FINDING NUMBER	RECOMMENDATION
GEN 001	Since industrial operations have ceased at Charleston NSY/FISC/NS, a request to be withdrawn from the NPDES Permit for Storm Water Discharges Associated with Industrial Activity should be sent to The Department of Health and Environmental Control. (40 CFR 122.26)

STANDARD ECE AUDIT - CHARLESTON NSY/FISC/NS
FEDERAL REGULATIONS AND POLICY

Auditor: ROB HARRELL

Date: 10/28/96 To 10/31/96

REGULATORY CITATION	AUDITOR'S CHECKLIST - AIR	Y/N N/A N/R	COMMENTS	FIND #
OPNAVINST 5090.1B 5-6.5 (a)(b)	Does the facility: (1) identify and submit environmental compliance projects required to bring air sources into compliance; and, (2) assure the CAA general conformity rule requirements are satisfied for all Navy actions at the facility?	N/A		
OPNAVINST 5090.1B 5-6.5(c)	Does the facility: (1) ensure that all permits and compliance statements for operations are signed by a responsible official; and, (2) develop host/tenant agreements to ensure tenants will comply with CAA regulations?	YES		
OPNAVINST 5090.1B 5-6.5 (d)	Does the facility: (1) ensure that applications for air permits related to demolition, preconstruction, and construction phases of projects are developed; (2) develop air permit applications for non-MILCON projects and pay related fees; and, (3) ensure that applications for operating permits and variances to temporarily operate air sources out of compliance with emission limitations are signed and related fees are paid?	YES		
OPNAVINST 5090.1B 5-6.5 (e)	Does the facility budget sufficient resources to maintain and demonstrate compliance with permit requirements and notify state and local authorities of all instances of noncompliance?	N/A		
OPNAVINST 5090.1B 5-6.5 (f), (g) and (h)	Does the facility: (1) survey emissions to identify potential reductions; (2) notify local REC of ERC sources; and, (3) submit to CNO via the chain of command, all instances in which compliance with the fuel standard is impractical?	N/A		
OPNAVINST 5090.1B 5-6.5 (i),(j) and (k)	Does the facility: (1) maintain current records of physical, operational, and emission characteristics of air sources; (2) develop air episode plans as required and provide copies to the local REC and EFDs; and, (3) cooperate with Navy air pollution episode coordinator, EPA and state or local authorities in the execution of air episode plans?	YES		
OPNAVINST 5090.1B 5-6.5 (l), (m) and (n)	Does the facility: (1) ensure motor vehicles and other mobile sources comply with applicable emissions standards; (2) develop and implement transportation control measures as required by the SIP; and, (3) furnish proof of compliance with all state I/M programs for vehicles operated on the facility where applicable?	N/A		
OPNAVINST 5090.1B 5-6.5 (o)	Does the facility implement and maintain proper adjustments in stationary heating and power plant operations to reduce total emissions?	YES		
OPNAVINST 5090.1B 5-6.5 (p)	Does the facility ensure that training is provided as required by the CAA?	N/A	Remainder of checklist items are "Not Applicable" for this facility.	

STANDARD ECE AUDIT - CHARLESTON NSY/FISC/NS
 FEDERAL REGULATIONS AND POLICY

Auditor: ROB HARRELL

Date: 10/28/96 To 10/31/96

REGULATORY CITATION	AUDITOR'S CHECKLIST - AIR	Y/N N/A N/R	COMMENTS	FIND #
	(Continuation)			

STANDARD ECE AUDIT - CHARLESTON NSY/FISC/NS
FEDERAL REGULATIONS AND POLICY

Auditor: ROB HARRELL

Date: 10/28/96 To 10/31/96

REGULATORY CITATION	AUDITOR'S CHECKLIST - ASB	Y/N N/A N/R	COMMENTS	FIND #
SECNAVINST 5212.10A	Are insulation/asbestos related records retained indefinitely?	YES		
CNO ltr 5090 Ser 454/ 6U395735 of 4 Nov 86	Has a comprehensive survey for asbestos containing material (ACM) been conducted?	YES		
OPNAVINST 5100.23B CH-4	Are asbestos Operation and Maintenance (O&M) Plans developed which ensure: - that known and suspected asbestos containing materials are regularly evaluated to minimize employee exposure until abatement actions are completed; - that damage to asbestos containing materials from facility renovations, and cleaning and maintenance operations are avoided; and - that repair and removal operations of asbestos containing materials, encountered during facility renovations, are performed correctly?	YES		
OPNAVINST 5100.23B CH-5	Are both management and staff personnel who regularly use, handle, or oversee operations involving asbestos containing materials, fully trained in asbestos matters?	YES	CSO does not handle asbestos.	
40 CFR 61.145 (a)	Are all structures thoroughly inspected for the presence of asbestos (including Category I and Category II nonfriable asbestos containing material) prior to demolition or renovation to determine applicable notification and emission control requirements? NOTE: Category I nonfriable asbestos-containing material (ACM) means packings, gaskets, resilient floor covering, and asphalt roofing products containing more than 1% asbestos. Category II nonfriable ACM means any material, excluding Category I, containing more than 1% asbestos.	YES		
40 CFR 61.145 (a) and (b)	Is the EPA/State provided written notice 10 days prior of intent to: - demolish facilities when regulated asbestos containing material (RACM) is present; and - renovate facilities when the presence of RACM exceeds the following: (1) 260 linear feet on pipes; (2) 160 square feet on other facility components; or (3) 35 cubic feet off facility components where the length or area could not be measured previously? NOTE: Regulated asbestos-containing material (RACM) means: (a) friable asbestos material; (b) Category I nonfriable ACM that has become friable; (c) Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading; and (d) Category II nonfriable ACM that has a high probability of becoming or has	YES	Compliance is required in lease agreements. Tenants are required to forward copies of all asbestos work to the Navy.	

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Auditor: ROB HARRELL

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REGULATORY CITATION	AUDITOR'S CHECKLIST - ASB	Y/N N/A N/R	COMMENTS	FIND #
	<p>(Continuation)</p> <p>become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.</p> <p>The notification must be reported using a form similar to that provided as Figure 3 in 40 CFR 61.145 entitled "NOTIFICATION OF DEMOLITION AND RENOVATION". If amount of RACM is less than the amounts listed above, a shortcut notification may be used without using this form. Notably, there is no minimum amount specified in the regulations that does not require notification.</p>			
40 CFR 61.145 (c)	<p>For facilities being demolished or renovated where the combined amount of RACM exceeds:</p> <p>(1) 260 linear feet on pipes;</p> <p>(2) 160 square feet on other facility components; or</p> <p>(3) 35 cubic feet off facility components where the length or area could not be measured previously;</p> <p>are procedures for asbestos emission control specified in 40 CFR 61.145(c) followed, including such measures as:</p> <ul style="list-style-type: none"> - adequately wetting the RACM during removal; - carefully lowering each unit or section to the floor and to ground level, not dropping, throwing, sliding, or otherwise damaging or disturbing the RACM; and - containing the RACM in leak-tight wrapping after removal? 	YES		
40 CFR 61.145 (c)(8)	<p>Is a trained foreman or other authorized representative on-site during all RACM removal regulated under 40 CFR 61.145(c); has that individual received training within the last two (2) years; and is evidence of the training posted at the demolition/renovation site?</p>	YES		
40 CFR 61.150 (a)	<p>Is all asbestos-containing waste material generated by demolition/renovation covered under the provisions of 40 CFR 61.145 handled such that there is no discharge of visible emissions to the outside air during collection, processing, packaging, or transportation?</p>	YES		
40 CFR 61.150 (a)(1)(iv)	<p>Are all containers or wrappings of asbestos-containing waste material generated by demolition/renovation covered by 40 CFR 61.145 labeled as specified by the Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.1001(j)(2) or 1926.58(k)(2)(iii); are the labels printed in letters of sufficient size and contrast so as to be readily visible and legible; and are the containers or wrappings labeled with the name of the generator and the location the waste was generated if the materials is to be transported off the facility?</p>	YES		
40 CFR 61.150	<p>Is all asbestos-containing waste material</p>	YES		

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(b)	<p>(Continuation) generated by demolition/renovation covered under the provision of 40 CFR 61.145 deposited as soon as is practical at:</p> <ul style="list-style-type: none"> - a waste disposal site operated in accordance with the provisions of 40 CFR 61.154; or - an EPA-approved site that convert RACM and asbestos-containing waste material into nonasbestos (asbestos-free) material according to the provisions of 40 CFR 61.155? <p>NOTE: These requirements do not apply to Category I nonfriable ACM that is not RACM.</p>			
40 CFR 61.150 (d)	<p>If asbestos-containing waste material generated by demolition/renovation covered under 40 CFR 61.145 is transported off the facility site:</p> <ul style="list-style-type: none"> - is a waste shipment record used, similar to Figure 4 under 40 CFR 61.150; - is a copy of the waste shipment record provided to the disposal site operator; - is the transporter or the owner/operator of the disposal site contacted if a copy of the waste shipment record, signed by the owner/operator of the disposal site, is not received by the waste generator within 35 days of the date the waste was accepted by the initial transporter; - is the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program notified in writing if a copy of the waste shipment record, signed by the owner/operator of the disposal site, is not received by the waste generator within 45 days after the date the waste was accepted by the initial transporter; and - is a copy of all waste shipment records retained for at least two (2) years? 	YES		
40 CFR 61.152	<p>Is a High Efficiency Particulate Air (HEPA) filter utilized to filter air leaving demolition/renovation sites when the asbestos content exceeds specified levels?</p>	N/A		
PRIMARY AND SECONDARY SCHOOLS		N/A		
40 CFR 763.85	<p>Have all school facilities been inspected for ACM?</p>			
40 CFR 763.90	<p>Has all friable ACM been encapsulated or removed from schools?</p>	N/A		
40 CFR 763.90	<p>Have projects been developed to remove or encapsulate all friable ACM in schools?</p>	N/A		

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	(Continuation)			
40 CFR 763.92	Have appropriate activity personnel received O&M training for schools containing ACM?	N/A		
40 CFR 763.93	Have approved asbestos O&M management plans been developed for schools containing ACM?	N/A		
40 CFR 763.93	Have employee and/or parents groups at schools containing ACM been notified appropriately?	N/A		
40 CFR 763.94	Are records maintained on site for all inspections, waste shipment records, abatement, and O&M training at schools containing ACM?	N/A		
40 CFR 763.95	Have warning labels been attached adjacent to ACM at school containing ACM?	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - CR	Y/N N/A N/R	COMMENTS	FIND #
<p>OPNAVINST 5090.1B 23-4.2.1 and 23-6.4(c) - and - 16 USC 470h-2(a)(2) 36 CFR 60.4</p>	<p>Has the activity provided for the professional identification, evaluation, and inventory of National Register Resources under its jurisdiction and control, and has the activity established a program to ensure that such properties are protected and not inadvertently transferred, sold, demolished, substantially altered, or allowed to disintegrate?</p>	YES		
	<p>NOTE: A National Register Resource is a broad concept which includes all resources which meets National Register criteria (36 CFR 60.4), even if the resources have not been formally registered, identified, or acknowledged as significant. Current federal regulations use the term "historic property" as a synonym for National Register Resource (which includes properties of archaeological significance (prehistoric and historic) and structures (buildings, bridges, dry docks, etc.), as well as objects (ships, aircraft, cannon, etc.) and sites of historic and traditional cultural value. Generally, structures built prior to the end of World War II (1946) should be considered eligible for listing in the National Register until assessed in consultation with the State Historic Preservation Officer (SHPO) and determined not to qualify. More recent structures may qualify if they are the work of a very important architect, or are of exceptional significance with respect to the Cold War or some other important event in American History.</p>			
<p>OPNAVINST 5090.1B 23-5.2 and 23-6.4(e) - and - 36 CFR 800 - and - 36 CFR 60.9 - and - 16 USC 470-470w-6</p>	<p>Has the activity developed and implemented a Historic and Archaeological Resources Protection (HARP) Plan which:</p> <ul style="list-style-type: none"> - identifies areas of probability for National Register Resources, based on overviews and surveys performed by cultural resources professionals; - contains an evaluation and inventory of all known historic and archaeological resources; - recommends priorities and describes applicable legal compliance strategies which avoid potential conflicts between Navy mission and preservation mandates; - prescribes specific compliance actions to be taken if Navy undertakings affect National Register Resources; and - is in consonance with State and Federal preservation programs and other Navy planning documents and processes? 	YES		
<p>36 CFR 60.9 - and - 16 USC 470-470w-6</p>	<p>Has the State Historical Preservation Officer (SHPO) been given an opportunity to review and comment on the Historic and Archaeological Resources Protection (HARP) Plan?</p>	YES		
<p>OPNAVINST</p>	<p>Has the activity planned, programmed, and budgeted</p>	YES		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - CR	Y/N N/A N/R	COMMENTS	FIND #
5090.1B 23-6.4(a)	(Continuation) adequate funds to ensure compliance with historic and archaeological resources protection requirements?			
OPNAVINST 5090.1B 23-6.4(b)	Has the activity Commanding Officer designated and had trained a staff person to serve as the Cultural Resources Specialist?	YES	CSO has designated staff for this area. Additionally, SOUTHDIR main office provides direct support as necessary.	
OPNAVINST 5090.1B 23-4.4 and 23-6.4(f)	For any undertaking which may affect a National Register Resource, does the activity initiate interagency consultation procedures with the State Historical Preservation Officer (SHPO) and the Advisory Council for Historic Preservation at the earliest planning stages, and if the undertaking does have an effect, does the activity enter into a Memorandum Of Agreement (MOA) regarding mitigation of such effects?	YES	CSO and SOUTHDIR main office coordinate as appropriate.	
OPNAVINST 5090.1B 23-4.1.2	If the activity and State Historic Preservation Officer (SHPO) concur that an action taken by the activity will have an adverse effect on a National Register Resource, but the effect will not be adverse, has the activity provided supporting documentation to the National Advisory Council?	YES		
OPNAVINST 5090.1B 23-6.4(d)	Are legally mandated procedures followed when National Register Resources under the activities control are transferred, sold, demolished, substantially altered, or allowed to deteriorate significantly?	YES	Lease agreement stipulate leasees coordinate with Government prior to any alterations to leased facilities and require compliance with all environmental and associated requirements.	
OPNAVINST 5090.1B 23-4.2.3	Whenever practical, does the activity use available historic buildings instead of new acquisition, construction or leasing to satisfy mission requirements.	N/R	Base is under closure status -- no need for additional space requirements.	
OPNAVINST 5090.1B 23-6.7(i)	Are funds that are budgeted for historic preservation applied to National Register Resources?	YES		
OPNAVINST 5090.1B 23-6.4(g)	<p style="text-align: center;">ARCHAEOLOGICAL RESOURCES</p> Are archaeological resources that are inadvertently discovered protected at the site of discovery until: <ul style="list-style-type: none"> - the Secretary of the Interior has been notified, and - a cultural resources professional has evaluated the discovery and advised the activity regarding protection or recovery? 	N/A		
OPNAVINST 5090.1B 23-6.7(j)	Does the activity provide for the storage and professional curation of salvaged archaeological resources and storage of records which might accrue in carrying out legal compliance actions?	N/A		
25 USC 3002 (d)(1)	Has the activity consulted the appropriate Indian tribe, Native Hawaiian organization or Alaska Native Corporation and reached agreement on the treatment to be afforded any Native American remains or objects inadvertently discovered on Federal land to avoid needless project delays during construction.	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - CR	Y/N N/A N/R	COMMENTS	FIND #
25 USC 3003	Has the activity identified and inventoried the archaeological material collections under its control and jurisdiction, as well as those that may have been taken from the activity's land in the past, to determine if they contain Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony, and arranged for the repatriation of such objects?	N/A		
16 USC 470aa-47011 - and - 32 CFR 229	Is the activity aware of its responsibilities to protect archaeological material located on lands under its jurisdiction or control, and of its authority to issue permits for the scientific study of such resources under the guidelines listed in 16 USC 470aa-47011 and 32 CFR 229?	YES		
	NATIONAL HISTORIC LANDMARKS	N/A		
OPNAVINST 5090.1B 23-4.3.1	Does the activity comply with Section 110(f) of the National Historic Preservation Act which affords National Historic Landmarks more stringent protection than other National Register Resources? NOTE: A National Historic Landmark is a National Register Resource designated by the Secretary of the Interior as having exceptional significance in the Nation's history and subject to the most stringent preservation requirements.			
OPNAVINST 5090.1B 23-4.3.2	Does the activity cooperate with the National Park Service (NPS) to: - ensure that National Historic Landmarks retain their integrity; - receive information concerning accepted preservation standards; - update administrative records on National Historic Landmark properties?	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - EPCRA	Y/N N/A N/R	COMMENTS	FIND #
EO 12856 EPCRA Section 302 and 303	Effective 03 Mar 94, has the activity made Threshold Planning Quantity (TPQ) notification of Extremely Hazardous Substances (EHS's) to the Local Emergency Planning Council (LEPC) and the State Emergency Response Council (SERC) ?	N/A	Final correspondence from the base to the regulators leads us to believe that annual EPCRA reporting is no longer required due to threshold requirements no longer being exceeded.	
EO 12856 EPCRA Section 304	Beginning 01 Jan 94, has the activity made appropriate written emergency release notifications to the LEPC and SERC if a release has occurred.	N/A		
EO 12856 40 CFR 370.20 (b)(1)	Effective 03 Aug 94, has activity made appropriate submittals of Material Safety Data Sheets (MSDS's) to the LEPC for all hazardous chemicals present at the facility, at any one time, in amounts equal to or greater than 10,000 lbs. and for all EHS present in an amount equal to or greater than 500 lbs. or the TPQ, which- ever is lower? The threshold is zero if the LEPC or SERC submit a request.	N/A		
EO 12856 40 CFR 370.20 (b)(2)	By 01 Mar annually, does the activity submit appropriate Section 312 Tier I / Tier II forms to the LEPC, SERC, and local fire department (if appropriate) for the preceding year, for all hazardous chemicals present at the facility at any one time in amounts equal to or greater than 10,000 lbs. and for all EHS present in an amount equal to or greater than 500 lbs. or the tpq, which ever is lower? The threshold is zero if the LEPC or SERC submit a request.	N/A		
EO 12856 40 cfr 372.30 (a)	By 01 July 1995 of each year, has the activity submitted appropriate Section 313 Form R's to the EPA and State for the preceding year if a threshold for reporting has been met, (and is all supporting documentation present, complete, and accurate)?	N/A		
EO 12856 40 CFR 372.10 (a)	Does the activity retain the following records for a period of three (3) years from the date of submission: - a copy of any Form R's? - all supporting documentation used to make the compliance determination that the facility is a or is not a "covered facility" (i.e 10 or more employees, and manufactured, processed or otherwise used a listed toxic chemical in excess of the applicable threshold)? - documentation supporting any determination that a claimed allowable exemption applies (i.e. De Minimus, article, structural use, routine janitorial or facility grounds maintenance, personal use, motor vehicle maintenance, etc.)? - data supporting the determination of whether a threshold applies for each listed toxic chemical (i.e. 25,000 lbs. manufactured or processed, and 10,000 lbs. otherwise used)? - documentation supporting the calculations and basis of estimating the quantity of each toxic chemical released or transferred off-site? - documentation supporting the use indications and quantity on site reporting for each toxic chemical, including the dates of manufacture, processing, or use?	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - EPCRA	Y/N N/A N/R	COMMENTS	FIND #
	(Continuation) - Receipts or manifests associated with the transfer of each toxic chemical in waste to off-site locations? - Documentation supporting reported waste treatment methods, estimates of treatment efficiencies, ranges of influent concentration, and the sequential nature of treatment steps, if applicable?			

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REGULATORY CITATION	AUDITOR'S CHECKLIST - HMC&M	Y/N N/A N/R	COMMENTS	FIND #
OPNAVINST 4110.2 6 and 8.i - and - OPNAVINST 5090.1B 3-4.3	Has the activity established written plans and procedures for Hazardous Material Control and Management (HMC&M), and do the plans include the following: - identification of hazardous materials (HM) needed for mission requirements, and where feasible (with supporting economic analysis) substitution of less hazardous materials; - development of an HM Authorized Use List (AUL) and controls over HM quantities used to reduce the generation of hazardous waste; - action necessary to reduce HM required and stored; - review of Navy specifications to determine changes required to reduce HM use; - identification and implementation of process changes and/or new processes which eliminate or reduce hazardous waste (HW); - incorporation of all known information concerning HMs, HW minimization, safety, health, and disposal guidance into all new operations and maintenance plans and manuals; - consolidation of HM requirements of several commands and shore activities where practical to reduce HM storage, handling, acquisition, etc; - identification of individuals responsible for HMs, HW, and HW minimization programs; and - plans to control, track, or reduce materials in use, in storage or stock, or disposed of as HW?	YES		
OPNAVINST 4110.2 encl (2) 2.b	Does the activity's HM AUL/inventory master list include the following information for all HM used at the activity: - location where materials are used and stored; - quantity normally on hand; - stock number; - chemical or common name; and - disposal requirements?	NO	OPNAVINST 4110.2 encl (2) 2.b requires the AUL include the location where hazardous materials are used and stored, disposal requirements, quantity normally on hand, stock number, and the chemical name. The current AUL does not include the location where the chemicals are used and stored or the disposal requirements.	HMC&M 001
29 CFR 1910.1200(e) - and - OPNAVINST 4110.2 7.b and 7.c	Has the activity developed a written Hazard Communication (HAZCOM) Program which covers the following: - labelling; - Material Safety Data Sheets (MSDSs); - training; - listing of HMs present at the activity; - methods to inform employees of hazards on non-routine tasks; - methods to inform employees of hazards of chemicals in unlabeled pipes; and - methods to inform contractor employees of the activity HAZCOM Program?	YES		
29 CFR 1910.1200 (e)(4) - and - OPNAVINST 4110.2 7.b, encl(1), and encl (3)	Does the activity make the written HAZCOM Program available, upon request, to employees, their designated representatives, and government officials?	YES		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - HMC&M	Y/N N/A N/R	COMMENTS	FIND #
OPNAVINST 4110.2 8.i(7)	Does the activity limit open purchases of HMs, regardless of the method employed, to purchases for which a suitable stock numbered product is unavailable from the supply system?	YES		
OPNAVINST 4110.2 8.i(7)	Is an MSDS obtained from the manufacturer or supplier prior to an authorization for use of a new product?	YES		
29 CFR 1910.1200(g) (1) - and - OPNAVINST 4110.2 6.d, 8.c(8), 8.i(3) and encl (2) 2.c	Does the activity have a MSDS for each HM used?	YES		
29 CFR 1910.1200(g) - and - OPNAVINST 4110.2 encl (1)	Has the activity established effective procedures for the review of MSDS received to ensure that the data contained therein complies with the provisions of 29 CFR 1910.1200(g) and FED-STD 313c? NOTE: The primary purpose of this review is to verify that required MSDS data fields have been completed, rather than to verify/confirm the technical adequacy of data provided by the manufacturer/importer.	YES		
29 CFR 1910.1200(g) (8) - and - OPNAVINST 4110.2 encl(2) 2.c	Does the activity ensure MSDSs are readily accessible during each work shift to employees when they are in their work areas?	YES	Although all MSDSs are located in building 30, it is recommended that all hazardous materials be accompanied by a copy of a MSDS in building 1824.	
OPNAVINST 4110.2 8.i(5)	Does the activity identify to NAVSUP, via the Quality Deficiency Reporting System, unlabeled shipments or shipments without MSDSs?	YES		
49 CFR 172.5 - and - OPNAVINST 4110.2 8.i	Are proper placards offered to commercial transportation vendors when hazardous materials are transported?	YES		
OPNAVINST 4110.2 8.i(5) - and - 49 CFR 172.4	Has the activity established procedures to ensure that all HMs used at the activity are properly and appropriately labeled under 29 CFR 1910.1200, NAVSUP guidance or procedures, and other applicable regulations of the DOT and OSHA?	YES		
29 CFR 1910.1200(f) (5) - and - OPNAVINST 4110.2 encl (2) 2.d	Does the activity ensure that each container of HM in the workplace is properly labeled, tagged, or marked with the identity of the hazardous chemical(s) contained therein, and appropriate hazard warnings?	YES		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - HMC&M	Y/N N/A N/R	COMMENTS	FIND #
OPNAVINST 4110.2 6.d	Does the activity ensure that unlabeled, incompletely labeled, or improperly labeled HM received from manufacturers, vendors, or distributors are not accepted?	YES		
OPNAVINST 5100.23C 0608e(2)	Has the activity established and implemented a local written training plan for HAZCOM consistent with activity needs?	YES		
OPNAVINST 5100.23C 0602a	Does training of management personnel include an overview of HM and HW control and management programs?	YES		
OPNAVINST 5100.23C 0602b	Does training of supervisors and employee representatives include HMC&M?	YES		
OPNAVINST 4110.2 8.i(6)	Has the activity implemented a regulatory compliance system to control and safeguard the labeling, collection, pickup, transportation, and ultimate disposal of HMs?	YES		
29 CFR 1910.1200(b) - and - OPNAVINST 4110.2 5.c, 7.b, and 7.c	Does the activity provide employees with information and training on hazardous chemicals in their work area at the time of initial assignment, and whenever a new hazard is introduced into their work area?	YES		
29 CFR 1910.1200 - and - OPNAVINST 4110.2 5.c	Does the information and training provided on hazardous chemicals cover the following: - the requirements of the OSHA Hazard Communication Standard; - any operations in their work areas where hazardous chemicals are present; - the location and availability of the written HAZCOM program, including the required list(s) of hazardous chemicals, and MSDSs; - methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area; - the physical and health hazards of the chemicals in the work area; - the measures employees can take to protect themselves from these hazards, including specific procedures the activity has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used; and - the details of the HAZCOM program developed by the activity, including an explanation of the labeling system and the MSDS, and how employees can obtain and use the appropriate hazard information?	YES		
29 CFR 1910.1200 h - and - OPNAVINST 4110.2 5	Does the Safety POC coordinate the activity HMC&M Program, and do departments/offices/shops/codes actively participate in the activity HMC&M Program?	N/A		
OPNAVINST 4110.2 6.f	Are decisions as to use of HMs or substitution of less hazardous material supported by an economic analysis, appropriate to the magnitude of the	YES		

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	(Continuation) decision being made, and do such analyses include cost factors and intangibles such as savings from reduction in training and other HM/HW related impacts?			
OPNAVINST 4110.2 8.i(7)	In cases where a standard stock item is deemed inferior, do activity personnel notify the supply officer so corrective action can be initiated?	N/A		
OPNAVINST 4110.2 8.i(10)	Does the activity report all HMC&M incidents which are a risk to the environment per OPNAVINST 5090.1B and those involving safety and health per OPNAVINST 5102.1C?	N/A		
OPNAVINST 4110.2 encl (2) 2.h	Has the Commanding Officer or designated representative approved HM storage locations?	YES		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - HWASTE	Y/N N/A N/R	COMMENTS	FIND #
40 CFR 262.34 (a)(2)	Is the date on which the period of accumulation begins clearly marked and visible on each tank and/or container?	YES		
40 CFR 262.34 (a)(3)	While on site, is each tank and/or container labeled or marked clearly with the words "Hazardous Waste"?	YES		
40 CFR 262.34 (b)	Is storage of hazardous waste tanks and/or containers limited to less than 90 days, unless an extension has been granted by the appropriate regulatory agency?	YES		
	TANK SYSTEMS	N/A		
40 CFR 265.191 (a)	Do all existing tanks that do not have secondary containment meeting 40 CFR 265.193 have on file a written assessment reviewed and certified by an independent qualified P.E. that attests to the tank system's integrity? NOTE: At a minimum, the assessment should consider the following: (1) design standards according to which the tank system was constructed; (2) hazardous characteristics of the wastes that have or will be handled; (3) existing corrosion protection measures; (4) documented age (if available) of the tank system; and (5) results of a leak test, internal inspection, or other tank integrity examination.	N/A		
40 CFR 265.192	Do all new tank systems have on file a written assessment (reviewed and certified by an independent, qualified, registered professional engineer) attesting that the system has sufficient structural integrity and is acceptable for storing and treating hazardous waste? NOTE: A new tank system is one that commenced construction after 14 July 1986, while an existing tank system is one that commenced construction on or before 14 July 1986.	N/A		
40 CFR 265.193 (a)(2);(a)(3)	Is secondary containment installed on new tank systems prior to their being put in service and for existing tank systems of known and documented age by the time the system is 15 years of age?	N/A		
40 CFR 265.193 (a)(4)	Is secondary containment installed by 12 January 1995 if the tank and piping system is of unknown age? NOTE: If the age of the process that utilizes the tank is greater than 7 years, secondary containment is required by the time the system is 15 years old. Buried tanks that have no secondary containment are in jeopardy of violating these regulations and should	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - HWASTE	Y/N N/A N/R	COMMENTS	FIND #
	(Continuation) begin closure.			
40 CFR 265.193 (b)(2)	Is secondary containment capable of detecting and collecting releases and accumulated liquids until the collected material is removed?	N/A		
40 CFR 265.193 (c)(3)	Does the secondary containment system have a leak detection system that is designed and operated so that it will detect the failure of either the primary or secondary containment structures or any release of hazardous waste in the secondary system within 24 hours, or at the earliest practicable time?	N/A		
40 CFR 265.193 (c)(4)	Are all spills, leaks or precipitation removed from the secondary containment system within 24 hours?	N/A		
40 CFR 265.193 (d)	Does secondary containment for tanks include one or more of the following devices: - a liner (external to the tank); - a vault; - a double-walled tank; or - an equivalent device as approved by the Regional Administrator?	N/A		
40 CFR 265.193 (e)	Does secondary containment satisfy the following requirements: (1) External Liner Systems - designed or operated to contain 100 percent of the capacity of the largest tank within its boundary; - designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system unless the collection system has sufficient excess capacity to contain run-on or infiltration; - free of cracks or gaps; and - designed and installed to completely surround the tank and to cover all surrounding earth likely to come into contact with the waste if released from the tanks; (2) Vault Systems - designed or operated to contain 100 percent of the capacity of the largest tank within its boundary; - designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system unless the collection system has sufficient excess capacity to contain run-on or infiltration; - constructed with chemical-resistant water stops in place at all joints (if any); - provided with an impermeable interior coating or lining that is compatible with the stored waste and that will prevent migration of waste into the concrete; - provided with a means to protect against the formation of an ignition of vapors within the vault if the waste is being treated meets the definition of ignitable	N/A		

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	<p>(Continuation)</p> <p>waste under 40 CFR 262.21 or meets the definition of reactive waste under 40 CFR 262.21 and may form an ignitable or explosive vapor;</p> <ul style="list-style-type: none"> - provided with an exterior moisture barrier or be otherwise designed or operated to prevent migration of moisture into the vault when subject to hydraulic pressure; <p>(3) Double-Walled Tanks</p> <ul style="list-style-type: none"> - designed as an integral structure so that any release from the inner tank is contained by the outer shell; - protected, if constructed of metal, from both corrosion of the primary tank interior and the external surface of the outer shell; and - provided with a built-in, continuous leak detection system capable of detecting a release within 24 hours or at the earliest practicable time? 			
40 CFR 265.193 (f)	<p>Does ancillary equipment have full secondary containment (i.e. trench, jacketing, double wall piping) that meets the requirements of 40 CFR 265.193(b) and (c)?</p> <p>NOTE: Above ground piping (exclusive of on-welded flanges, joints, valves, and connections) are exempt if visual inspections for leaks are performed on a daily basis.</p>	N/A		
40 CFR 265.194 (a) and (b)	<p>Hazardous waste must not be placed in tanks if it would cause the tank system to rupture, leak, corrode or otherwise fail. Are appropriate controls and practices to prevent spills and overflows from tank or secondary containment systems included (i.e., maintaining sufficient freeboard in uncovered tanks to prevent overtopping by wave or wind action, level sensing devices, high level alarms, automatic feed cut-off, etc.)?</p>	N/A		
40 CFR 265.195 (a)(1) through (4)	<p>Are all tank systems inspected and documented at least once a day for leaks or releases within and outside of the secondary containment system, and are all above ground portions of the tank system inspected to detect corrosion or release of waste?</p>	N/A		
40 CFR 265.195 (b)(1) and (2)	<p>Does the owner or operator inspect and document cathodic protection systems, if present?</p>	N/A		
40 CFR 265.196	<p>Once a leak or spill is detected at a tank system, are the following actions taken:</p> <ul style="list-style-type: none"> - tank is removed from service and flow of hazardous waste into the tank system or secondary containment system is immediately stopped; - within 24 hours, all waste from the tank system or secondary containment system is removed; - visible releases to the environment are contained; 	N/A		

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	(Continuation) - EPA/State is notified verbally within 24 hours of detection unless spill was less than 1 pound and immediately contained and cleaned up; - EPA/State notified in writing within 30 days of detection; - leak source repaired or tank closure procedures commence; and - if repairs are required, a P.E. certifies that repairs are adequate?			
40 CFR 265.197 (a)	At the closure of a tank system, does the operator remove or decontaminate all waste residues, contaminated containment system components, contaminated soils, and structures and equipment contaminated with waste, and manage them as hazardous waste? NOTE: Closure must meet the requirements specified in 40 CFR 265.111 and 40 CFR 265.114.	N/A		
40 CFR 265.197 (b)	If the owner has not removed or decontaminated all the contaminated soils as required in 40 CFR 265.197(a), has the owner performed post-closure care?	N/A		
40 CFR 265.198 (a)	Are ignitable or reactive wastes not placed in tank systems, unless: - waste is mixed, treated, or rendered so that it no longer meets the definition of ignitable or reactive waste, and the proper reaction precautions are implemented as stated in 40 CFR 265.17(b); - the waste is stored or treated in such a way that it is protected from any material or condition that may cause the waste to ignite or react; or - the tank system is used solely for emergencies?	N/A		
40 CFR 265.198 (b)	Are distances between ignitable or reactive waste management areas and public ways maintained as specified in the National Fire Protection Association (NFPA) codes?	N/A		
40 CFR 265.199 (a)	Are incompatible wastes not placed in the same tank system unless proper reaction precautions are implemented as stated in 40 CFR 265.17(b)?	N/A		
40 CFR 265.199 (b)	Is hazardous waste not placed in a tank system that has not been decontaminated and that previously held an incompatible waste or material?	N/A		
	CONTAINERS	YES		
40 CFR 265.171	Are hazardous waste containers in good condition?			
40 CFR 265.172	Are hazardous wastes compatible with containers?	YES		
40 CFR 265.173 (a)	Are hazardous waste containers closed except when necessary to add or remove waste?	YES		

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	(Continuation)			
40 CFR 265.173 (b)	Are hazardous waste containers handled, opened, or stored in a manner which will not rupture the container or cause it to leak?	YES		
40 CFR 265.174	Are container storage areas inspected at least weekly looking for leaks and deterioration caused by corrosion or other factors?	YES		
40 CFR 265.176	Are containers holding ignitable or reactive waste located at least 50 feet from the activity's property line?	YES		
40 CFR 265.177 (a)	Does the activity ensure that incompatible wastes are not placed in the same container, unless in compliance with 40 CFR 265.17(b)?	N/A		
40 CFR 265.177 (b)	If a hazardous waste is placed in a container that previously held an incompatible waste, does the activity ensure that the container is washed before reuse?	N/A		
40 CFR 265.177 (c)	If a storage container holds a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments, is it separated from the other materials by means of a dike, berm, wall, or other device?	N/A		
40 CFR 265.111	Are container storage facilities closed in a manner that: - minimizes the need for further maintenance; and - controls, minimizes or eliminates post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, etc.? - complies with the closure requirements of 40 CFR 264 and 265	N/A		
40 CFR 265.114	During final closure, are all contaminated equipment, structures and soil properly disposed, or decontaminated?	N/A		
	CONTAINMENT BUILDINGS	N/A		
40CFR 265.1101 (a)	Do containment buildings satisfy the following design and operating requirements: - completely enclosed with a floor, walls, and a roof to prevent exposure to the elements and assure containment of managed wastes? - constructed of materials of sufficient strength and thickness to support themselves, the waste contents and any personnel and heavy equipment that operate within the unit? - surfaces contacting hazardous waste are chemically compatible with the wastes handled? - include a primary barrier capable of withstanding movement of personnel, waste, and handling equipment in the unit during the			

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40CFR 265.1101 (b)	<p>(Continuation) operating life of the unit?</p> <p>For a containment building used to manage hazardous wastes containing free liquids or treated with free liquids, has the owner/operator included the following:</p> <ul style="list-style-type: none"> - a primary designed and constructed of materials to prevent the migration of hazardous constituents into the barrier? - a liquid collection and removal system to prevent the accumulation of liquid on the primary barrier? - a secondary containment systems, including a secondary barrier designed and constructed to prevent hazardous constituent migration into the barrier, as well as a leak detection system capable of detecting failure of the primary barrier? 	N/A		
40CFR 265.1101 (c)	<p>Does the owner/operator of the containment building use controls and practices to ensure containment of the hazardous waste within the unit, including:</p> <ul style="list-style-type: none"> - maintaining the primary barrier to ensure it is free of significant cracks, gaps, corrosion, or other deterioration that could cause hazardous waste to be released from the primary barrier? - maintain the level of hazardous waste within the containment walls of the unit so that the height of any containment wall is not exceeded? - take measure to prevent tracking hazardous waste out of the unit by personnel and equipment? - designate an area for equipment decontamination, as well as collect and properly manage rinsate from the equipment decontamination? - take measures to control fugitive dust emissions so that no emissions are visible from doors, windows, vents, particulate collection devices, or other openings? 	N/A		
40CFR 265.1101 (c)(2)	<p>Does the owner/operator obtain certification by a qualified, registered, professional engineer that the containment building design meets the requirements indicated above?</p>	N/A		
40CFR 265.1101 (c)(2)	<p>Is a copy of the containment building design certification (prepared by a qualified registered professional engineer) available in the facility's operating log no later than 60 days after the date of initial operation of the unit?</p>	N/A		
40CFR 265.1101 (c)(3)	<p>If the owner/operator detects a condition that has caused a release of hazardous waste, has the owner/operator:</p> <ul style="list-style-type: none"> - entered the discovery in the facility operating log? - immediately removed the affected building section from service? - determined repair steps required and a 	N/A		

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	(Continuation) - schedule for completion of repairs? - notified the Regional Administrator of the condition within 7 days, provided repair steps and schedule within 14 days, and notified the Regional Administrator in writing when repairs are complete and have been certified by a qualified, registered, professional engineer?			
40CFR 265.1101 (c)(4)	Does the owner/operator inspect and record in the facility's operating log weekly data gathered from monitoring equipment and leak detection equipment as well as the containment building and surrounding area to detect signs of releases of hazardous waste?	N/A		
40CFR 265.1101 (d)	For containment buildings that contain both areas with and without secondary containment, has the owner/operator: - designed and operated each area in accordance with the requirements for that type area? - taken measures to prevent the release of liquids or wet materials into areas without secondary containment? - description of procedures used to ensure the integrity of areas without secondary containment?	N/A		
40 CFR 262.34 (a)(1)(iv)	Does the owner/operator maintain at the facility: - a written description of procedures to ensure that each volume of waste remains in the unit for no more than 90 days, a written description of the waste generation and management practices for the facility showing that they are consistent with respecting the 90 day limit, and documentation that procedures are complied with, OR, - documentation that the unit is emptied at least once every 90 days?	N/A		
40CFR 265.1102 (a)	At closure of the containment building, does the owner/operator remove or decontaminate all waste residues, contaminated containment system components, contaminated soils, and structures and equipment contaminated with waste, and manage them as hazardous waste?	N/A		
40CFR 265.1102 (b)	If the owner/operator has not removed or decontaminated all waste residues as required in 40 CFR 265.1102(a), has the owner/operator performed post closure care?	N/A		
	PERSONNEL TRAINING	YES		
40 CFR 265.16 (a)(1)	Have facility personnel completed a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures facility compliance?			
40 CFR 265.16 (a)(2)	Is the training program directed by a person trained in hazardous waste management procedures?	YES		
40 CFR 265.16 (a)(3)(i) through (vi)	At a minimum, has the training program been designed to ensure that facility personnel can respond to emergencies by familiarizing them with	YES		

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	(Continuation) emergency procedures, equipment, and systems?			
40 CFR 265.16 (b)	Have facility personnel completed the training program within 6 months after the date of their employment, and have untrained personnel worked with supervision?	YES		
40 CFR 265.16 (c)	Have facility personnel taken part in an annual review of their initial training?	YES		
40 CFR 265.16 (d)	Have the following documents and records been maintained at the facility: - job title for each position at the facility and the name of the person filling it; - a written job description for each of the positions; - a written description of the type and the amount of training needed for each position; and - records documenting that the training has been given to, and completed by personnel?	NO	Per 40 CFR 265.16 (d), the following documents and records are required to be maintained at the 90 day storage area: - job title for each position at the facility and the name of the person filling it; - a written job description for each of the positions; - a written description of the type and the amount of training needed for each position; and - records documenting that the training has been given to, and completed by personnel. The records and files for the personnel who work at the 90 day storage facility, Building 1824, did not contain all of the information required by 40 CFR 265.16(d).	HW 001
40 CFR 265.16 (e)	Are training records on current personnel kept on file until closure of the facility, and are records on former employees kept on file for at least 3 years from the date of last employment?	YES		
	PREPAREDNESS AND PREVENTION	YES		
40 CFR 265.31	Has the facility been maintained and operated to minimize the possibility of fire, explosion, or any sudden release to the environment?	YES		
40 CFR 265.32	Is facility equipped with the following: - internal communications or alarm system (voice or signal); - telephone or hand-held two-way radio capable of summoning emergency help; - portable fire extinguishers, fire control equipment, spill control, and decontamination equipment; and - water at adequate volume and pressure to supply fire hoses, foam equipment, or sprinklers?	YES		
40 CFR 265.33	Is equipment required by 40 CFR 265.32 tested/maintained to assure proper operation?	NO	40 CFR 265.33 requires equipment used to minimize the possibility of fire, explosion, or any sudden release to the environment be tested/maintained to assure proper operation. The fire extinguishers in Building 1824 have not been tested or maintained to ensure proper operation.	HW 002
40 CFR 265.34 (a)	Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, do all personnel involved in the operation have immediate access to an internal alarm or emergency communication device?	YES		

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40 CFR 265.34 (b)	If there is ever just one employee on the premises, do they have immediate access to a device, such as a telephone or a hand-held two-way radio capable of summoning external emergency assistance?	YES		
40 CFR 265.35	Is proper aisle space maintained to allow the unobstructed movement of personnel, fire equipment, spill control equipment, and decontamination equipment?	YES		
40 CFR 265.37 (a)(1) & (b)	<p>Does the activity attempt to make the following arrangements, as appropriate for the type of waste handled at the facilities, and the potential need for the services of these organizations:</p> <ul style="list-style-type: none"> - arrangements to familiarize police, fire departments, and emergency response teams with: <ul style="list-style-type: none"> * the facility layout * properties of hazardous waste handled at the facility and its hazards * places where personnel would normally be working * entrances to roads inside the facility, and possible evacuation routes; - where there is more than one fire department, etc, an agreement designating primary emergency authority to a specific fire department, etc., and agreements with others to provide support; - agreements with State emergency response teams, contractors, and equipment suppliers; - arrangements to familiarize hospitals with the properties of hazardous waste handled at the facility, and the types of injuries or illnesses which could result from fires, explosions or releases, - where State or local authorities decline to enter into such arrangements, is the refusal documented in the operating record? <p>SUBPART D - CONTINGENCY PLAN AND EMERGENCY PROCEDURES</p>	YES		
40 CFR 265.51 (a) - and - OPNAVINST 5090.1B 10-5.2.2	<p>Does the facility have a Hazardous Waste Contingency Plan?</p> <p>NOTE: The contingency plan may be a Spill Prevention Control and Countermeasures (SPCC) Plan, amended to incorporate hazardous waste management provisions, or the contingency plan may be incorporated into the activity's Oil and Hazardous Substance (OHS) Spill Contingency Plan. OPNAVINST 5090.1B 10-5.2.2 requires that OHS plans be kept current, and reviewed and updated annually.</p>			
40 CFR 265.52	<p>Does the Hazardous Waste Contingency Plan for the facility include the following:</p> <ul style="list-style-type: none"> - a description of actions facility personnel must take during spills, fires, and explosions; 	NO	40 CFR 265.52 requires each facility to have a Hazardous Waste Contingency Plan, and that the plan contain certain facility specific descriptions relating to emergency procedures. The facility does not have an updated	HW 003

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	<p>(Continuation)</p> <ul style="list-style-type: none"> - a description of all arrangements made pursuant to 40 CFR 265.37; - a current listing of names, addresses, and phone numbers (office and home) of all persons qualified to act as the emergency coordinator, designating the primary emergency coordinator and alternatives in the order in which they will assume responsibility; - a current listing of emergency equipment with the location and physical description of each item on the list; and - an evacuation plan for facility personnel with signals to be used, and primary/ alternate evacuation routes? 		Contingency Plan which includes Building 1824.	
40 CFR 265.53	<p>Is a copy of the Hazardous Waste Contingency Plan (and any revisions):</p> <ul style="list-style-type: none"> - maintained at the facility; and - submitted to all local police/fire departments, hospitals, and state and local response teams that may provide emergency services? 	NO	<p>40 CFR 265.53 requires that the Hazardous Waste Contingency Plan be maintained at the facility, and submitted to local agencies.</p> <p>The facility does not have a current Contingency Plan and the plan has not been submitted to the local agencies.</p>	HW 004
40 CFR 265.54	<p>Was the Hazardous Waste Contingency Plan reviewed and immediately amended when the:</p> <ul style="list-style-type: none"> - applicable regulations are revised; - Plan failed in an emergency; - facility changes increased the potential for fire, explosion, or hazardous waste release or altered the response necessary in an emergency; - list of emergency coordinators changes; and - list of emergency equipment changes? 	N/A	No more deficiencies related to the Contingency Plan are included in this audit. Finalizing the Contingency Plan currently in draft form will correct any and all deficiencies related to the Contingency Plan.	
40 CFR 265.55	<p>Is the emergency coordinator:</p> <ul style="list-style-type: none"> - thoroughly familiar with all aspects of the facility's Hazardous Waste Contingency Plan, facility operations, location and characteristics of waste handled, locations of records, and facility layout; - (or alternate) on the facility premises or on call to respond to an emergency in a short period of time; and - authorized to commit resources to implement the Hazardous Waste Contingency Plan? 	N/A		
40 CFR 265.56 (a)	<p>During an imminent or actual emergency, did the emergency coordinator perform an assessment and activate alarms and request appropriate local and State response assistance?</p>	N/A		
40 CFR 265.56 (d)	<p>If a release, fire, or explosion occurred which threatened human health or the environment outside the facility, did the emergency coordinator make the following notifications (where appropriate):</p> <ul style="list-style-type: none"> - local fire and emergency response officials; and - either the National Response Center (NRC) or the pre-designated on-scene coordinator? 	N/A		
40 CFR 265.56 (g)	<p>Immediately after an emergency, did the emergency coordinator provide for treating, storing, or disposing of any recovered hazardous waste,</p>	N/A		

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	(Continuation) contaminated soil, or other hazardous materials in accordance with 40 CFR 262, 263, and 265?			
40 CFR 265.56 (h)(2)	After a release, did the emergency coordinator ensure that all emergency equipment listed in the Hazardous Waste Contingency Plan was cleaned and certified fit for its intended use before facility operations were resumed?	N/A		
40 CFR 265.56 (i)	Were the Regional Administrator and appropriate officials notified that the facility was in compliance with 40 CFR 265.56(h) prior to resuming operations after a release?	N/A		
40 CFR 265.56 (j)	Was a written report sent to the Regional Administrator within 15 days of a release or accident that required activating the Contingency Plan?	N/A		
	SUBPART B - STANDARDS FOR ALL REGULATED UNITS AT PART B PERMITTED FACILITIES General	N/A	The permitted units, buildings 246 and 1640, have been closed per 40 CFR 264. Certifications of closure were submitted to SCDHEC prior to base closure, 3/1/96.	
40 CFR 270.30 (a)	Does the activity comply with all conditions of the Part B permit, including the following: - does all waste stored/treated at the facility coincide with those wastes listed in the permit; and - does the facility comply with volume capacity indicated in the permit?			
40 CFR 264.13 (a)(2)	Does the permitted facility maintain and follow a written waste analysis plan for all wastes treated, stored, or disposed?	N/A		
40 CFR 264.13 (a)(3)	Is the analysis from the Waste Analysis Plan repeated as necessary to ensure that it is accurate and up to date?	N/A		
40 CFR 264.14 (b)	Does the permitted facility have one of the following: - a 24-hour surveillance system which continuously monitors and controls entry; or - a fence in good repair which, in combination with natural barriers, surrounds the facility, and a means to control entry at all times (i.e. attendant, locked gate, TV monitors, and/or controlled roadway access)?	N/A		
40 CFR 264.14 (c)	Is a sign with the legend "DANGER - UNAUTHORIZED PERSONNEL KEEP OUT" posted at each entrance to the permitted facility, and is the sign legible from a distance of at least 25 feet?	N/A		
40 CFR 264.15 (a)	Does the owner or operator inspect his facility for malfunction and deterioration, operator errors, and discharges which may cause or lead to (1) release of hazardous waste constituents to the environment or (2) a threat to human health.	N/A		
40 CFR 264.15 (b)	Has the owner of the permitted facility: - developed and followed a written schedule for	N/A		

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	(Continuation) inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment which identifies the types of problems which are to be looked for during the inspection (i.e. leaking fittings, inoperative sump pumps, etc.); - kept a copy of the written inspection schedule at the facility; and - inspected areas subject to spills, such as loading and unloading areas, at least daily?			
40 CFR 264.15 (c)	Does the owner of the permitted facility remedy any deteriorations or malfunctions of equipment or structures, which inspections reveal, in a timely manner?	N/A		
40 CFR 264.15 (d)	Does the owner of the permitted facility record inspections in a log and maintain the log for a minimum of three (3) years, and does the log include, at a minimum: - date and time of the inspection; - name of the inspector; - notation of the observations found; and - date and nature of any repairs or other remedial actions?	N/A		
	Personnel Training	N/A		
40 CFR 264.16 (a)(1)	Have facility personnel completed a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures facility compliance?	N/A		
40 CFR 264.16 (a)(2)	Is the training program directed by a person trained in hazardous waste management procedures?	N/A		
40 CFR 264.16 (a)(3)	At a minimum, has the training program been designed to ensure that facility personnel can respond to emergencies by familiarizing them with emergency procedures, equipment, and systems?	N/A		
40 CFR 264.16 (b)	Have facility personnel completed the training program within 6 months after the date of their employment, and have untrained personnel worked with supervision?	N/A		
40 CFR 264.16 (c)	Have facility personnel taken part in an annual review of their initial training?	N/A		
40 CFR 264.16 (d)	Have the following documents and records been maintained at the facility: - a job title for each position at the facility, and the name of the person filling it; - a written job description for each of the positions; - a written description of the type and the amount of training needed for each position; and - records documenting that training has been given to, and completed by, personnel?	N/A		
40 CFR 264.16 (e)	Are training records on current personnel kept on file until closure of the permitted facility, and	N/A		

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	(Continuation) are records on former employees kept on file for at least three (3) years from the date of last employment?			
40 CFR 264.17 (a)	Are "NO SMOKING" signs conspicuously placed in the permitted facility wherever there is a hazard from ignitable or reactive wastes?	N/A		
	SUBPART C - PREPAREDNESS AND PREVENTION	N/A		
40 CFR 264.31	Has the permitted facility been maintained and operated to minimize the possibility of fire, explosion, or any sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment?			
40 CFR 264.32	Is the permitted facility equipped with the following: - internal communications or alarm system (voice or signal); - telephone or hand-held two-way radio capable of summoning emergency help; - portable fire extinguishers, fire control equipment, spill control and decontamination equipment; and - water at adequate volume and pressure to supply water hoses, foam equipment, or automatic sprinklers?	N/A		
40 CFR 264.33	Is equipment required by 40 CFR 264.32 tested/maintained to assure proper operation?	N/A		
40 CFR 264.34 (a)	Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, do all personnel involved in the operation have immediate access to an internal alarm or emergency communication device either directly, or through visual or voice contact with another employee?	N/A		
40 CFR 264.34 (b)	If there is ever just one employee on the premises, do they have immediate access to a device, such as a telephone or a hand-held two-way radio capable of summoning external emergency assistance?	N/A		
40 CFR 264.35	Is proper aisle space maintained in the permitted facility to allow the unobstructed movement of personnel, fire equipment, spill control equipment, and decontamination equipment?	N/A		
40 CFR 264.37	Does the activity attempt to make the following arrangements, as appropriate for the type of waste handled at the permitted facility and the potential need for the services of these organizations: - arrangements to familiarize police, fire departments, and emergency response teams with: * the facility layout * properties of hazardous waste handled at the facility and its hazards * places where personnel would normally be working	N/A		

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	<p>(Continuation)</p> <ul style="list-style-type: none"> * entrances to roads inside the facility, and possible evacuation routes; - where there is more than one fire department, etc., an agreement designating primary emergency authority to a specific fire department, etc, and agreements with others to provide support; - agreements with State emergency response teams, contractors, and equipment suppliers; - arrangements to familiarize hospitals with the properties of hazardous waste handled at the facility, and the types of injuries or illnesses which could result from fires, explosions, or releases; and - where State or Local authorities decline to enter into such arrangements, is the refusal documented in the operating record? <p>SUBPART D - CONTINGENCY PLAN AND EMERGENCY PROCEDURES</p>			
40 CFR 264.51 (a)	<p>Does the permitted facility have a Hazardous Waste Contingency Plan?</p> <p>NOTE: The contingency plan may be a Spill Prevention Control and Countermeasures (SPCC) Plan, OPA 90 Facility Response Plan, or some other emergency or contingency plan.</p>	N/A		
40 CFR 264.52	<p>Does the contingency plan for the permitted facility include the following:</p> <ul style="list-style-type: none"> - a description of actions facility personnel must take during spills, fires, and explosions; - a description of all arrangements made pursuant to 40 CFR 264.37; - a current listing of names, addresses, and phone numbers (office and home) of all persons qualified to act as the emergency coordinator, designating the primary emergency coordinator and alternatives in the order in which they will assume responsibility; - a current listing of emergency equipment with the location and physical description of each item on the list; and - an evacuation plan for facility personnel with signals to be used, and primary/ alternate evacuation routes? <p>NOTE: A contingency plan may be an amended Spill Prevention Control and Countermeasures (SPCC) Plan, OPA 90 Facility Response Plan, or some other contingency plan which incorporates hazardous waste management provisions.</p>	N/A		
40 CFR 264.53	<p>Is a copy of the Hazardous Waste Contingency Plan (and any revisions):</p> <ul style="list-style-type: none"> - maintained at the facility; and - submitted to all local police/fire departments, hospitals, and state and local response teams that may provide emergency 	N/A		

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	(Continuation) services?			
40 CFR 264.54	Was the Hazardous Waste Contingency Plan reviewed and immediately amended when the: - facility permit was revised; - Plan failed in an emergency; - facility changes increased the potential for fire, explosion, or hazardous waste release or altered the response necessary in an emergency; - list of emergency coordinators changes; and - list of emergency equipment changes?	N/A		
40 CFR 264.55	Is the emergency coordinator: - thoroughly familiar with all aspects of the facility's Hazardous Waste Contingency Plan, facility operations, location and characteristics of waste handled, locations of records, and facility layout; - (or alternate) on the facility premises or on call to respond to an emergency in a short period of time; and - authorized to commit resources to implement the Hazardous Waste Contingency Plan?	N/A		
40 CFR 264.56 (a)-(c)	During an imminent or actual emergency, did the emergency coordinator perform an assessment and activate alarms and request appropriate local and State response assistance?	N/A		
40 CFR 264.56 (d)	If a release, fire, or explosion occurred which threatened human health or the environment outside the facility, did the emergency coordinator make the following notifications (where appropriate): - local fire and emergency response officials; and - either the National Response Center (NRC) or the pre-designated on-scene coordinator?	N/A		
40 CFR 264.56 (g)	Immediately after an emergency, did the emergency coordinator provide for treating, storing, or disposing of any recovered hazardous waste, contaminated soil, or other hazardous materials in accordance with 40 CFR 262, 263, and 264?	N/A		
40 CFR 264.56 (h)(2)	After a release, did the emergency coordinator ensure that all emergency equipment listed in the Hazardous Waste Contingency Plan was cleaned and certified fit for its intended use before facility operations were resumed?	N/A		
40 CFR 264.56 (i)	Were the Regional Administrator and appropriate officials notified that the facility was in compliance with 40 CFR 264.56(h) prior to resuming operations after a release?	N/A		
40 CFR 264.56 (j)	Was a written report sent to the Regional Administrator within 15 days of a release or accident that required activating the Contingency Plan?	N/A		
29 CFR 1910 .120(p)(1)	Has the activity developed the following programs at hazardous waste Treatment Storage and Disposal	N/A		

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through (8)	<p>(Continuation) (TSD) facilities (except as noted in 29 CFR 1910.120(a)(2)(iii):</p> <ul style="list-style-type: none"> - safety and health; - hazard communication; - medical surveillance; - decontamination; - new technology; - material handling; - training; and - emergency response? 			
29 CFR 1910 .120(p)(8)(ii) and (iv)	<p>Are the following items contained in the emergency response plan for hazardous waste Treatment, Storage, and Disposal (TSD) facilities:</p> <ul style="list-style-type: none"> - pre-emergency planning and coordination with outside parties; - personnel roles, lines, or authority, and communication; - emergency recognition and prevention; - safe distances and places of refuge; - site security and control; - evacuation routes and procedures; - decontamination procedures; - emergency medical treatment and first aid; - emergency alerting and response procedures; - critique of response and follow-up; - personal protective equipment and emergency equipment; - site topography, layout, and prevailing weather conditions; - reporting procedures; - coordination with other appropriate local, State, and Federal plans; - review and plan amendment procedures; and - rehearsal requirements? 	N/A		
29 CFR 1910 .120(p)(8)(iii)(A)	<p>Are hazardous waste Treatment Storage and Disposal (TSD) facility emergency response personnel properly trained before being called to respond to an emergency?</p>	N/A		
29 CFR 1910 .120(p)(8)(iii)(B)	<p>Are hazardous waste Treatment Storage and Disposal (TSD) emergency response personnel trained to a level of competence in the recognition of health and safety hazards to protect themselves and other employees?</p>	N/A		
29 CFR 1910 .120(p)(8)(iii)(C)	<p>Are hazardous waste Treatment Storage and Disposal (TSD) emergency response personnel certificates of training (or other methods used to demonstrate competency that meets 29 CFR 1910.120(p)(8)(iii)) maintained and recertified at least yearly?</p>	N/A		
29 CFR 1910 .120(q)	<p>Does the activity have a written emergency response plan to respond to emergencies outside of the hazardous waste Treatment Storage and Disposal (TSD) facilities, and does the plan address the following items:</p> <ul style="list-style-type: none"> - pre-emergency planning and coordination with outside public; - personnel roles, lines of authority, training, and communication; - emergency recognition and prevention; - safe distances and places of refuge; 	N/A		

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	<p>(Continuation)</p> <ul style="list-style-type: none"> - site security and control; - evacuation routes and procedures; - decontamination; - emergency medical treatment and first aid; - emergency alerting and response procedures; - critique of response and follow-up; and - personal protective equipment and emergency equipment? 			
	<p>SUBPART E - MANIFEST SYSTEM, RECORD KEEPING, AND REPORTING</p>	N/A		
40 CFR 264.71 (a)	<p>If the permitted facility receives hazardous waste from an off-site source accompanied by a manifest, does the owner/operator:</p> <ul style="list-style-type: none"> - sign and date each copy of the manifest to certify that the hazardous waste was received; - note any significant discrepancies (as defined in 40 CFR 264.72(a)) on each copy of the manifest; - immediately give the transporter at least one copy of the signed manifest; - send a copy to the generator within 30 days; and - retain at the facility a copy of each manifest for at least three (3) years from the date of delivery? 			
40 CFR 264.71 (b)	<p>If the permitted facility receives hazardous waste from an off-site source, via rail or water (bulk shipment) transporter, which is accompanied by a shipping paper containing all the information required on the manifest (excluding the EPA ID numbers, generator's certification, and signatures), does the owner/operator:</p> <ul style="list-style-type: none"> - sign and date each copy of the manifest or shipping paper (if the manifest has not been received) to certify receipt of the hazardous waste; - note any significant discrepancies (as defined in 40 CFR 256.72(a)) on each copy of the manifest or shipping paper (if manifest has not been received); - immediately give the rail or water (bulk shipment) transporter at least one copy of the manifest or shipping paper (if manifest has not been received); - send a copy of the signed and dated manifest to the generator within 30 days of delivery or send a copy of the shipping paper signed and dated to the generator if the manifest has not been received (by the generator) within 30 days after delivery; - retain at the facility a copy of the manifest and shipping paper (if signed in lieu of the manifest at the time of delivery) for at least three (3) years from the date of delivery; and - comply with 40 CFR 262 requirements whenever a shipment of hazardous waste is initiated from the facility? 	N/A		
40 CFR 264.72 (a)	<p>Are the manifest or shipping papers received from off-site sources free of the following discrepancies:</p>	N/A		

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	<p>(Continuation)</p> <ul style="list-style-type: none"> - differences between quantity or type of hazardous waste designated, and the quantity or type of hazardous waste actually received; - variations greater than 10% for bulk waste; - any variation in piece count, such as discrepancy of one drum in a truck load for batch waste; - obvious differences discovered by inspection or waste analysis; and - toxic constituents not reported on manifest or shipping paper? 			
40 CFR 264.72 (b)	<p>Upon discovery of a significant hazardous waste manifest discrepancy, received from an off-site source, has the permitted facility owner/operator:</p> <ul style="list-style-type: none"> - attempted to reconcile the discrepancy with the waste generator or transporter (i.e. telephone conversations); and - submitted a letter to the EPA Regional Administrator within 15 days after receipt of the waste, describing the discrepancy and the reconciliatory attempts, and providing a copy of the subject manifest or shipping paper? 	N/A		
40 CFR 264.73 (a)	<p>Is a written operating record kept at the permitted facility?</p>	N/A		
40 CFR 264.73 (b)	<p>Is the following information recorded and maintained in the operating record until closure of the permitted facility:</p> <ul style="list-style-type: none"> - a description and the quantity of each hazardous waste received, and the method and date of its treatment, storage, or disposal at the facility; - the location of each hazardous waste within the facility, and the quantity at each location; - records and results of the waste analysis; - summary reports of all incidents that require implementing the contingency plan; - records and results of inspections; - monitoring, testing, or analytical data where required; - records of the quantities for each shipment of hazardous waste placed in land disposal units (under an extension to the effective date of any LDR granted according to 40 CFR 268.6); and - a copy of the notice and certification (and demonstration if applicable) as required by 40 CFR 268.7 or 268.8 for the off-site/on-site treatment, land disposal, or storage facility? 	N/A		
40 CFR 264.74	<p>Are all records, including plans made available for inspection by any officer, employee or representative of EPA who is duly designated by the administrator?</p> <ul style="list-style-type: none"> - Is the retention period for all records extended automatically during the course of any unresolved enforcement action? - Are copies of records of waste disposal locations and quantities submitted to the regional administrator and local authority 	N/A		

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	(Continuation) upon closure of the facility?			
40 CFR 264.75	Does the activity prepare and submit a single copy of a Biennial Report (EPA Form 8700-13B) to the Regional Administrator by 1 March of each even numbered year? NOTE: If the state's regulatory agency is authorized to manage the RCRA program for EPA, the state's reporting requirement may supersede the EPA's biennial reporting requirement.	N/A		
40 CFR 264.76	If the permitted facility accepts hazardous waste from an off-site source for treatment, storage, or disposal without an accompanying manifest or shipping paper (as described in 40 CFR 263.20(e)(2)), has the owner/operator prepared and submitted a copy of a report to the EPA Regional Administrator that includes the following: - EPA ID number, name, and address of the facility; - date of receipt of the waste; - EPA ID number, name, and address of the generator and transporter, if available; - a description and the quantity of each un-manifested hazardous waste and facility received; - the method of treatment, storage, or disposal for each hazardous waste; - certification signed by owner/operator or agent of the facility; and - brief explanation of why waste was not manifested, if known? SUBPART G - CLOSURE AND POST-CLOSURE	N/A		
40 CFR 264.110	Have all permitted Treatment, Storage, and Disposal (TSD) units identified on the Part A Permit application complied with the following requirements at closure of the units: - closure performance standard (40 CFR 264.111); - closure plan, amendment of plan (40 CFR 264.112); - time allowed for closure (40 CFR 264.113); - disposal or decontamination of equipment, structures, and soil (40 CFR 264.114); - certification of closure (40 CFR 264.115); - survey plat (40 CFR 264.116); - post-closure care and use of property (40 CFR 264.117); - post-closure plan, amendment of plan (40 CFR 264.118); - post-closure notices (40 CFR 264.119); and - certification of completion of post-closure care (40 CFR 264.120)? SUBPART I - USE AND MANAGEMENT OF CONTAINERS	YES	Certifications of closure have been submitted to the state prior to base closure, 3/1/96.	
40 CFR 264.171	Are hazardous waste containers in the permitted facility in good condition?	N/A		
40 CFR 264.172	Are hazardous wastes in the permitted facility	N/A		

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	(Continuation) compatible with the containers in which they are stored?			
40 CFR 264.173 (a)	Are hazardous waste containers in the permitted facility closed except when it is necessary to add or remove waste?	N/A		
40 CFR 264.173 (b)	Are hazardous waste containers in the permitted facility not opened, handled, or stored in a manner which may rupture the containers or cause them to leak?	N/A		
40 CFR 264.174	Is the permitted facility container storage area inspected at least weekly, looking for leaks and deterioration caused by corrosion or other factors?	N/A		
40 CFR 264.175 (b)(1)	Is the containment floor/base of the permitted facility free of cracks or gaps, and sufficiently impervious to contain leaks, spills, or accumulated precipitation?	N/A		
40 CFR 264.175 (b) (2)	Is the permitted facility designated and operated to drain and remove liquid resulting from precipitation, or are containers evaluated or otherwise protected from contact with accumulated liquid?	N/A		
40 CFR 264.175 (b)(5)	Are spilled or leaked wastes and accumulated precipitation removed from the sump of the collection area in the permitted facility in a timely manner as to prevent overflow of the collection system?	N/A		
40 CFR 264.175 (c)	Is the permitted facility designed and operated to drain and remove liquid resulting from precipitation, or are containers elevated or otherwise protected from contact with accumulated liquid?	N/A		
40 CFR 264.176	Are containers in the permitted facility holding ignitable or reactive waste located at least 50 feet from the activity's property line?	N/A		
40 CFR 264.177 (a)	Are incompatible waste not placed in the same container, unless 40 CFR 264.17(b) is complied with?	N/A		
40 CFR 264.177 (c)	Are containers holding incompatible hazardous wastes in the permitted facility separated from each other by a dike, berm, wall, or other device?	N/A		
40 CFR 264.178	At closure are all hazardous waste and hazardous wastes residues removed from the containment system?	N/A		
	SUBPART J - TANKS	N/A		
40 CFR 264.191 (a) and (b)	Do all existing tanks that do not have secondary containment meeting 40 CFR 264.193 have on file a written assessment reviewed and certified by an independent qualified P.E. that attests to the tank system's integrity (was required by 12 Jan 88), and at a minimum does the assessment consider			

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	<p>(Continuation) the following:</p> <ul style="list-style-type: none"> - design standards according to which the tank and ancillary equipment were constructed; - hazardous characteristics of the wastes that have or will be handled; - existing corrosion protection measures; - documented age (if available) of the tank system; and - results of a leak test, internal inspection, or other tank integrity examination? 			
40 CFR 264.193 (a)(3)	If the tank system is of known and documented age, or if the system is 15 years of age (whichever is later), has secondary containment been established (was required by 12 Jan 89)?	N/A		
40 CFR 264.193 (a)(4)	If the tank and piping system is of unknown age, will secondary containment be in effect (as required) by 12 Jan 95?	N/A		
	<p>NOTE: If the age of the process that utilizes the tank is greater than 7 years, secondary containment was required, at the latest, by 12 Jan 89. Also, buried tanks that have no secondary containment are in jeopardy of violating these regulations and should begin closure.</p>			
40 CFR 264.193 (c)(3)	Does the secondary containment system provide a leak detection system that is designed and operated so it will detect the failure of either the primary or secondary containment structure, or the presence of any release within 24 hours or at the earliest practicable time?	N/A		
40 CFR 264.193 (c)(4)	Are all spills, leaks, or precipitation removed from the secondary containment system within 24 hours or in as timely a manner as possible?	N/A		
40 CFR 264.193 (d)	Does the secondary containment for the tank include one or more of the following devices: <ul style="list-style-type: none"> - a liner (external to the tank); - a vault; - a double-walled tank; or - an equivalent device, as approved by the Regional Administrator? 	N/A		
40 CFR 264.193 (e)	Does secondary containment satisfy the following requirements: <p>(1) External Liner Systems</p> <ul style="list-style-type: none"> - designed or operated to contain 100 percent of the capacity of the largest tank within its boundary; - designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system unless the collection system has sufficient excess capacity to contain run-on or infiltration; - free of cracks or gaps; and - designed and installed to completely surround the tank and to cover all surrounding earth likely to come into 	N/A		

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	<p>(Continuation) contact with the waste if released from the tanks; (2) Vault Systems - designed or operated to contain 100 percent of the capacity of the largest tank within its boundary; - designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system unless the collection system has sufficient excess capacity to contain runoff or infiltration; - constructed with chemical-resistant water stops in place at all joints (if any); - provided with an impermeable interior coating or lining that is compatible with the stored waste and that will prevent migration of waste into the concrete; - provided with a means to protect against the formation of an ignition of vapors within the vault if the waste is being treated meets the definition of ignitable waste under 40 CFR 262.21 or meets the definition of reactive waste under 40 CFR 262.21 and may form an ignitable or explosive vapor; - provided with an exterior moisture barrier or be otherwise designed or operated to prevent migration of moisture into the vault when subject to hydraulic pressure; (3) Double-Walled Tanks - designed as an integral structure so that any release from the inner tank is contained by the outer shell; - protected, if constructed of metal, from both corrosion of the primary tank interior and the external surface of the outer shell; and - provided with a built-in, continuous leak detection system capable of detecting a release within 24 hours or at the earliest practicable time?</p>			
40 CFR 264.193 (f)	<p>Does ancillary equipment have full secondary containment (i.e. trench, jacketing, double wall piping) that meets the requirements of 40 CFR 264.193(b) and (c)?</p> <p>NOTE: Above ground piping (exclusive of on-welded flanges, joints, valves, and connections) are exempt if visual inspections for leaks are performed on a daily basis.</p>	N/A		
40 CFR 264.194	<p>Hazardous waste must not be placed in a tank if it would cause the tank system to rupture, leak, corrode, or otherwise fail: Are appropriate controls and practices in place to prevent spills and overflows from the tank or secondary containment system?</p> <p>NOTE: Controls and practices to prevent spills and overflows include: - level sensing devices; - high level alarms;</p>	N/A		

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	(Continuation) - automatic feed cut-off; and - maintaining sufficient freeboard in uncovered tanks to prevent overtopping by wave action.			
40 CFR 264.195 (a)	Has the owner or operator developed and followed a schedule/procedure for inspecting overfill controls?	N/A		
40 CFR 264.195 (b)	Are all tank systems inspected and documented at least once each operating day for leaks or releases within and outside of the secondary containment system, and are above ground portions of the tank system inspected to detect corrosion or release of waste?	N/A		
40 CFR 264.195 (c)(1)	Does the owner or operator inspect cathodic protection systems within 6 months of installation and annually thereafter?	N/A		
40 CFR 264.195 (d)	Does the owner or operator document all inspections in the operating record?	N/A		
40 CFR 264.196	Once a leak or spill is detected at a tank system, are the following actions taken: - tank is removed from service and flow of hazardous waste into tank system or secondary containment system is immediately stopped; - within 24 hours, all waste from tank system or secondary containment system is removed; - visible releases to the environment are contained; - EPA/State is notified within 24 hours of detection unless spill was less than one pound and immediately contained and cleaned-up; - EPA/State is notified in writing within 30 days of detection; - leak source is repaired or tank closure procedures commence; and - if major repairs are required, a P.E. certifies that repairs are adequate?	N/A		
40 CFR 264.197 (a)	At the closure of a tank system, does the operator remove or decontaminate all waste residues, contaminated containment system components, contaminated soils, and structures and equipment contaminated with waste, and manage them as hazardous waste?	N/A		
40 CFR 264.198 (a)	Are ignitable or reactive wastes not placed in tank systems, unless: - the waste is mixed, treated, or rendered so that it no longer meets the definition of ignitable or reactive waste; - the waste is stored or treated in such a way that it is protected from any material or condition that may cause the waste to ignite or react; - the tank system is used solely for emergencies; and - the waste management area is a minimum distance from any publicly owned road system or Base property boundary, as specified by	N/A		

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	(Continuation) Tables 2-1 through 2-6 of National Fire Prevention Association (NFPA) "Flammable and Combustible Liquids Code"?			
40 CFR 264.199 (a)	Are incompatible wastes not placed in the same tank system unless proper reaction precautions are implemented as stated in 40 CFR 264.17(b)	N/A		
	SUBPART K - SURFACE IMPOUNDMENTS	N/A		
40 CFR 264.221 (a)	Do all surface impoundments not covered by 40 CFR 265.221(c) have a liner for all portions of the impoundments (except for existing portions of such impoundments)?			
40 CFR 264.221 (c)	Do all new impoundments, replacements of existing impoundments, or lateral expansions of existing impoundments, have two or more liners and a leachate collection and removal system between liners? NOTE: 40 CFR 264.221(c) will not apply if it can be demonstrated to EPA/State that alternative design and operating practices, together with location characteristics, will prevent migration of any hazardous constituent.	N/A		
40 CFR 264.226 (b)	Are operational surface impoundment inspected at least weekly and after storms to detect evidence of the following: - deterioration, malfunctions, or improper operation of overtopping control systems; - sudden drops in the level; and - severe erosion?	N/A		
40 CFR 264.228 (a)(1) and (2)	At closure, are all waste residues, liners, subsoils, and any contaminated structures and equipment removed or decontaminated, and then managed as hazardous waste, or: - are free liquids removed or the remaining wastes and waste residues solidified; - are remaining waste stabilized to a bearing capacity to support final cover; and - is the impoundment capped?	N/A		
40 CFR 264.228 (b)	If some waste residues or contaminated materials are left in place at final closure, does the owner comply with post-closure requirements by: - maintaining the integrity and effectiveness of the final cover; - maintaining and monitoring the groundwater monitoring system; and - preventing run-on and run-off from eroding or damaging final cover?	N/A		
40 CFR 264.229 (a)	If hazardous waste entering the impoundment is ignitable or reactive, is it treated before or immediately after placement in the impoundment so that the waste is no longer ignitable or reactive?	N/A		
	SUBPARTS AA - ORGANIC AIR EMISSION STANDARDS FOR PROCESS VENTS	N/A		

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40 CFR 264 .1032(a)	(Continuation) Has the activity evaluated the regulatory status of process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, or air or steam stripping operations managing hazardous wastes with organic concentrations of at least 10 ppmw if process vents are in: - units subject to permitting requirements of 40 CFR 270; or - hazardous waste recycling units located on-site?			
40 CFR 264 .1032(b)	If the activity installs a closed-vent system and control device to comply with the provisions of 40 CFR 264.1032(a), does the system and device meet the requirements of 40 CFR 264.1033?	N/A		
40 CFR 264 .1032(c)	If performance tests are used to determine vent emissions, emission reductions, or total organic compound concentrations achieved by add-on control devices, do the performance test conform with the requirements of 40 CFR 264.1034(c)? NOTE: Determinations of vent emissions, emission reductions, or total organic compound concentrations achieved by add-on control devices may be based on engineering calculations or performance tests.	N/A		
40 CFR 264 .1032(d)	When an activity and the Regional Administrator do not agree on determinations of vent emissions, emission reductions, or total organic compound concentrations achieved by add-on control devices based on engineering calculations, are the procedures in 40 CFR 264.1034(c) used to resolve the disagreement?	N/A		
SUBPART BB - ORGANIC AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS		N/A		
40 CFR 264 .1050(b)	Has the activity evaluated regulatory status of equipment that contains or contacts hazardous waste with organic concentrations of at least 10 percent by weight, if the equipment is managed in: - units subject to permitting requirements of 40 CFR 270; or - hazardous waste recycling units located on-site?			
40 CFR 264 .1052	If 40 CFR 264.1050(b) standards apply, has the activity complied with 40 CFR 264.1052 standards for pumps in light liquid service?	N/A		
40 CFR 264 .1053	If 40 CFR 264.1050(b) standards apply, has the activity complied with 40 CFR 264.1053 standards for compressors?	N/A		
40 CFR 264 .1054	If 40 CFR 264.1050(b) standards apply, has the activity complied with 40 CFR 264.1054 standards for pressure relief devices for gas/vapor service?	N/A		
40 CFR 264 .1056	If 40 CFR 264.1050(b) standards apply, has the activity complied with the 40 CFR 264.1056	N/A		

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	(Continuation) standards for open-end valves or lines?			
40 CFR 264 .1057	If 40 CFR 264.1050(b) standards apply, has the activity complied with 40 CFR 264.1057 standards for valves in gas/vapor service or in light liquid service?	N/A		
40 CFR 264 .1058	If 40 CFR 264.1050(b) standards apply, has the activity complied with 40 CFR 264.1058 standards for pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors?	N/A		
40 CFR 264 .1060	If 40 CFR 264.1050(b) standards apply, has the activity complied with 40 CFR 264.1060 standards for closed-vent system and control devices?	N/A		
	SUBPART CC - ORGANIC AIR EMISSION STANDARDS FOR TANKS, CONTAINERS, SURFACE IMPOUNDMENTS, AND MISCELLANEOUS UNITS	N/A		
40 CFR 264 .1080(b)	Has the activity evaluated the regulatory impact of Subpart CC organic air emission control standards? NOTE: The activity is not subject to Subpart CC if the facility's waste management units consist only of: - Waste management units into which no hazardous wastes are added on or after 6/5/95; - Tanks and surface impoundments into which hazardous waste addition has stopped and which are closing; - Container with a capacity < 0.1 cubic meters (about 26 gallons); - Waste management units that are used solely for on-site treatment or storage of remediation waste; - Waste management units that are used solely for treatment or storage of mixed wastes; - Waste management units excluded from regulation under 264.1(g) or 265.1(c), except for generators who accumulate wastes on-site in permit-exempt tanks and containers subject to 40 CFR 262.34.			
40 CFR 264 .1082(c)(1)	Has the activity evaluated their regulatory exemption of Subpart CC (organic air emission control standards) for managed hazardous waste with volatile organic concentrations <100ppmw at the point of waste origination in accordance with the following determinations: - made the initial determination by 6 Dec 1995, - maintained documentation of the waste determination, and - modified the activity's waste analysis plan to include procedures and schedules for waste sampling/analysis? NOTE: Includes Hazardous Waste Management Units which manage waste with volatile organic concentrations of <100 ppmw (high VOC wastes are considered those >100ppmw volatile organic	N/A		

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40 CFR 264.13 264.1082(c)(1) 264.1083(c)(1)	<p>(Continuation) concentration)</p> <p>Has the activity evaluated the regulatory impact of Subpart CC (organic air emission control standards) for hazardous waste with initial organic concentrations >100 ppmw by performing the following determinations:</p> <ul style="list-style-type: none"> - ensure that the hazardous waste management unit(s) used to store and treat the high VOC hazardous wastes comply with the organic air emission control standards for the type(s) of hazardous waste management unit(s) used to store and treat the high VOC hazardous wastes prior to and during treatment; and - ensure that documentation is maintained indicating the high VOC hazardous wastes are treated to the specified Subpart CC levels if the activity is storing the treated wastes in a hazardous waste management unit that does not comply with the Subpart CC organic air emission standards (i.e. a Subpart CC exempt unit) 	N/A		
40 CFR 264 .1086(b)(1)	<p>Has the activity ensured that Non-Exempt CONTAINERS (excluding treatment containers for high volatile organic concentration hazardous wastes) meet the following:</p> <ul style="list-style-type: none"> - the container is a covered container that is monitored, or; - the container is a DOT-approved drum equipped with a cover and has a capacity not exceeding 0.46 cubic meters (about 119 gallons), or - the container is a vapor-tight truck, trailer, or railcar? <p>NOTE: Non-Exempt Activities is a determination that activities cannot claim any exemption from Subpart CC (organic air emission) nor for <100 ppmw volatile organic concentration hazardous waste or the exemption for hazardous waste management units that have been treated to Subpart CC specified levels.</p>	N/A		
40 CFR 264 .1087(c)(1)	<p>Does the activity ensure that Non-Exempt CONTAINERS (used for treatment of high volatile organic concentration hazardous wastes) meet the following:</p> <ul style="list-style-type: none"> - for high volatile organic concentration hazardous wastes being treated in CONTAINERS, the container, whenever open, is located within a negative pressure enclosure which is connected to a control device thru a closed vent system, and; - high volatile organic concentration hazardous waste transferred to a container with a capacity >0.46 cubic meters (about 119 gallons) by pumping is performed using a tube with the tube outlet near the bottom of the container, and all container opening are closed and sealed except where the tube enters the container, and; - high volatile organic concentration hazardous waste transferred by means other than pumping is done so that during waste transfer the cover remains in place and all openings are closed and sealed except for those thru which waste is 	N/A		

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	(Continuation) added.			
	NOTE: Non-Exempt Activity is a determination that activities cannot claim any exemption from Subpart CC (organic air emission) nor for <100 ppmw volatile organic concentration hazardous waste or the exemption for hazardous waste management units that have been treated to Subpart CC specified levels.			
40 CFR 264 .1084(c)	Does the activity with Non-Exempt TANKS use tanks with fixed-roof cover with design capacity dependent on the waste's vapor pressure (use method 25E to determine vapor pressure)?	N/A		
40 CFR 264 .1084(b)	For the activity with Non-Exempt TANKS, if the TANK is not quiescent, unheated and not used for stabilization or other exothermic reaction, does the activity use one of the following: - a cover connected to a control device through a closed vent system; - a fixed-roof cover with an internal floating roof with the appropriate seals; - an external flooring roof with appropriate seals; or - a pressure tank that operates as a closed system?	N/A		
40 CFR 264 .1085(c)	Does the activity ensure that Non-Exempt surface impoundments that are quiescent, unheated, and not used for waste stabilization or other exothermic reaction, use floating membrane covers?	N/A		
40 CFR 264 .1085(b)	Does the activity ensure that Non-Exempt surface impoundments that not quiescent, unheated, and not used for waste stabilization or other exothermic reaction, use air-supported or rigid cover connected to a control device through a closed-vent system?	N/A		
40 CFR 264.15 264.1088 264.1089 264.1090	Does the activity with Non-Exempt surface impoundments inspect and monitor covers and cover openings for leaks, initial installation and semi-annually thereafter, maintain documentation, modify facility general inspection plans, and submit semiannual noncompliance reports?	N/A		
40 CFR 264 .1087(c)(1)	Does the activity ensure that (if used) control devices include one of the following: - control device that achieves 95% reduction of total organic content; - enclosed combustion device that achieves at least 95% reduction of total organic content or 20 ppmv organics in the exhaust; or - a flare?	N/A		
40 CFR 264 .1089	Does the activity ensure that the following records are kept on site and readily available to agency personal: - results of all waste analyses for VOC concentration at the point of waste origination and organic vapor pressure; - Design information for all floating-roof tank covers, surface impoundment floating membranes,	N/A		

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	(Continuation) enclosures that vent organic emissions from open containers in which hazardous waste is being treated closed-vent systems, and attached control devices; - Inspection and monitoring results for all emission control equipment; - Method 27 organic vapor tightness test results for tank trucks or tank railcars; - Records of all control device continuous monitoring, including "exceedances" and the actions taken to correct them; - Leak repair records, including dates and methods; - Methods of management of the spent carbon from carbon adsorption systems; - Identification of incinerators, boilers, and industrial furnaces used to treat hazardous wastes; - Documentation for biological treatment units using air emission controls; and - Identification of equipment that is deemed unsafe or difficult to inspect or monitor?			
40 CFR 264 .1090	Has the permitted activity evaluated the reporting requirements of "Subpart CC"	N/A		
OPNAVINST 5090.1B 12-5.3	Does the activity have an up-to-date Hazardous Waste Management Plan which contains the following: - identify applicable Federal, states, and local regulations pertaining to the generation and management of HW; - identify training requirements, and describe procedures for obtaining training and maintaining training records; - assign responsibilities for the generation, designation, handling, treatment, disposal, and all documentation; - describe all HW generation and management procedures; and - include or reference HW minimization plan and goals.	YES		
OPNAVINST 5090.1B 12-5.4	Are NFESC annual reports prepared and submitted in a timely manner and kept on file for at least three (3) years?	N/R	The person responsible for filing this report had recently left, and the current personnel were not familiar with this report.	
40 CFR 262.11	Does the activity perform (and document) waste determinations on solid wastes generated using the following procedures: - determine if the waste is excluded from regulations under 40 CFR 261.4; - determine if the waste is listed in subpart D of 40 CFR 261; and - determine if the waste is characteristic based on analytical or user knowledge?	YES		
40 CFR 262.12	Has the generator ensured that no hazardous wastes have been treated, stored, disposed of, transported, or offered for transportation prior to receiving an EPA identification number?	YES		
	MANIFESTS	YES		

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	(Continuation)			
40 CFR 262.20	Does a generator who transports hazardous waste, or offers for transportation hazardous waste for off-site treatment, storage, and/or disposal, prepare a manifest?			
40 CFR 262.21 - and - OPNAVINST 5090.1B 12-4.1(f)	Is the Uniform Hazardous Waste Manifest, or state equivalent, used for all hazardous waste shipped off-site? NOTE: When the state to which the shipment is manifested supplies the manifest and requires its use, then the generator must use that manifest.	YES		
40 CFR 262.20 (a) through .23	Does the generator's manifests contain the following information: - manifest document number; - generator's name, mailing address, and telephone number; - generator's ID number; - transporter's name and ID number; - waste information required by DOT shipping name, quantity, container type and number; - designated facility name, address and EPA I.D. No.; - alternate facility name (if any); - handwritten signature of generator on certification section; - handwritten signature of initial transporter and date; - required paperwork burden disclosure statement; - statement certifying that a program is in place to reduce the volume and toxicity of hazardous waste generated; and - all annotated alterations initiated by generator and transporter?	YES		
49 CFR 172.604	Does the generator's manifest have an emergency response information telephone number in a clearly visible location? NOTE: Emergency response communication standards require that a 24-hour number be indicated; for example, "EMERGENCY CONTACT: _____". For DoD, the emergency response information number is that of the Defense Logistics Agency, 1-800-851-8061. The activity may also list a 24-hour number of its own.	YES		
	PRE-TRANSPORTATION	YES		
40 CFR 262.30 through .33	Before transporting off-site, or offering hazardous waste for transportation, does the generator: - package Hazardous Waste in accordance with DOT regulations (49 CFR 173, 178, and 179); - label each package in accordance with DOT regulations (49 CFR 172); - mark each package in accordance with DOT			

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	<p>(Continuation)</p> <ul style="list-style-type: none"> - regulations (49 CFR 172); - mark each container of 110 gallons or less with the following label: "HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If Found, Contact the Nearest Police or Public Safety Authority or the U.S. EPA"; - include the generator's name, address, and manifest document number; and - have placards to offer to transporters according to DOT regulations for hazardous materials (49 CFR 172, Subpart F)? <p style="text-align: center;">RECORD KEEPING</p>			
40 CFR 262.40	<p>Are the following records kept at the facility for at least 3 years:</p> <ul style="list-style-type: none"> - copy of the signed manifests from the TSD facility which received the waste, - copy of each exception report, - copy of each Biennial Report, or equivalent (RCRA authorized) State report, - records of any test results, waste analyses, or other waste determination made in accordance with 262.11? 	YES		
40 CFR 262.41	<p>Is the Biennial Report (EPA Form 8700-22A) prepared and submitted to the Regional Administrator by March 1 of each even numbered year?</p> <p>NOTE: If the state's regulatory agency is authorized to manage the RCRA program for EPA, the state's reporting requirement may supersede the EPA's biennial reporting requirement.</p>	YES		
40 CFR 262.42 (a)(1)	<p>If the copy of the signed manifest from the facility designated to receive the waste has not been returned within 35 days of the date the waste was accepted by the initial transporter, has the activity contacted the transporter to determine the status of the hazardous waste?</p>	YES		
40 CFR 262.42 (a)(2)	<p>Are Exception Reports submitted to the EPA Regional Administrator when copies of hazardous waste manifests with the hand written signature of the designated TSD facility are not received within 45 days of the date the wastes were accepted by the initial transporter?</p>	YES		
40 CFR 262.43	<p>If requested by regulatory agencies, has the hazardous waste generator furnished additional reports concerning quantities and disposition of wastes identified?</p> <p style="text-align: center;">RECOVERABLE MATERIALS</p> <p>The regulations of this subpart apply to recyclable materials that are reclaimed to recover economically significant amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any</p>	N/A		

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	(Continuation) combination of these.			
40 CFR 266.70 (b)	Do persons who generate recyclable materials follow: - notification requirements under section 3010 of RCRA; - manifesting requirements in accordance with Subpart B of Part 262; - transportation requirements; and - storage requirements?			
40 CFR 266.70 (c)	If the generator stores recycled materials that are regulated under 40 CFR 266.70, are records maintained which document: - the volume of materials stored at the beginning of the calendar year; - the amount of material generated or recycled during the calendar year; and - the amount of material remaining at the end of the calendar year?	N/A		
	SPENT LEAD-ACID BATTERIES BEING RECLAIMED Persons who generate, transport, collect, or store spent batteries but do not reclaim them are not subject to regulation under Parts 124, 262 through 266, or 270; and are not subject to the requirements of section 3010 of RCRA.	N/A		
40 CFR 266.80 (b)	Do persons who store spent batteries before reclaiming follow: - notification requirements under section 3010 of RCRA; and - all applicable provisions in Subparts A through L, inclusive, of Part 264 except for sections 264.13, 264.71, and 264.72?			
40 CFR 268.3	Is dilution prohibited as a substitute for treatment? NOTE: Any person who generates, treats, stores, or disposes of a hazardous waste may submit an application to the administrator for an extension to the effective date of any applicable restriction established under Subpart C of this Part.	N/A		
40 CFR 268.5 (a)	If the activity submitted an application to the Administrator for an extension of the effective date, were the following demonstrations performed: - A good faith effort to locate and contract with a treatment facility to manage the waste. - Entered into a binding contractual commitment to construct or other use provide alternate treatment. - Due to circumstances beyond his control, such alternative capacity cannot reasonably be made available by the applicable effective date. - The capacity being constructed or otherwise provided by the applicant will be sufficient to manage the entire quantity. - Providing schedule for obtaining required	N/A		

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40 CFR 268.7 (a)(1)	<p>(Continuation) operating permit or an outline of how and when alternative capacity will be available. - Has arranged adequate capacity to manage the waste during the extension. - If applicable, any waste managed in a surface impoundment or landfill during the extension period will meet the requirements of paragraph (h)(2) of 268.5.</p> <p style="text-align: center;">LAND DISPOSAL RESTRICTIONS</p> <p>If any restricted wastes do not meet the applicable treatment standards set forth in subpart D of 40 CFR 268, or exceeds the applicable prohibition levels set forth in 40 CFR 268.32 or RCRA 3004(d), does the generator notify the TSD facility in writing with each shipment of the appropriate treatment standards and applicable prohibition levels, and do the notices include the following: - EPA hazardous waste number; - the waste constituents that the treator will monitor, if monitoring will not include all regulated constituents, for wastes F001-F005, F039, D001, D002 and D012-D043. Generators must also include whether the waste is a non-wastewater or wastewater, if applicable; - the manifest number associated with the shipment of waste; - for hazardous debris when using the alternative treatment technologies provided by 268.45 - for hazardous debris when using the treatment standards for the contaminating waste(s) 268.45.</p>	YES		
40 CFR 268.7 (a)(2)	<p>If restricted wastes meet applicable treatment standards set forth in subpart D of 40 CFR 268, or the applicable prohibition levels set forth in 40 CFR 268.32 or RCRA 3004(d), does the generator submit to the TSD facility a notice and a certification stating that the wastes meet the applicable treatment standards, and does the notice include: - EPA hazardous waste number; - the waste constituents that the treator will monitor, if monitoring will not include all regulated constituents for wastes F001-F005, F039, D001, D002, and D012-D043. The Generator must also include whether the waste is non-wastewater or wastewater, if applicable; - the manifest number associated with the shipment of waste; - waste analysis data, when available.</p>	YES		
40 CFR 268.7 (a)(2)	<p>Are certifications for wastes which meet the treatment standards signed by an authorized representative, and do the certifications state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards</p>	YES		

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	<p>(Continuation) specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment?"</p>			
<p>40 CFR 268.7 (a)(3)</p>	<p>If hazardous waste is subject to an exemption (such as a case-by-case extension under 40 CFR 268.6 or a national capacity variance under subpart C) from a prohibition on the type of land disposal method utilized for the waste, has the activity submitted a notice (with each shipment) to the facility receiving the waste stating that the waste is not prohibited from land disposal?</p> <p>(Note: And does the notice include :</p> <ul style="list-style-type: none"> - EPA hazardous waste number; - the waste constituents that the treator will monitor if monitoring will not include all regulated constituents for wastes F001-F005, F039, D001 D002 and D012-D043. The generator must also include whether the waste is a non-wastewater or wastewater; - the manifest number associated with the shipment of the waste; - for hazardous debris when using the alternative treatment technologies by 265.45; - for hazardous debris when using the treatment standards for the contaminating waste(s) in 268.40. 	<p>YES</p>		
<p>40 CFR 268.7 (a)(4)</p>	<p>If a generator is managing a land disposal restricted (LDR) waste in tanks or containers regulated under 40 CFR 262.34, and is treating such waste in tanks or containers to meet applicable treatment standards under Subpart D of 40 CFR 268, has the generator developed and does the generator follow a written waste analysis plan which describes the procedures the generator will carry out to comply with the treatment standards (the plan must be kept on-site)?</p>	<p>N/A</p>		
<p>40 CFR 268.7 (a)(4)(i) through (iii)</p>	<p>Is/Does the waste analysis plan:</p> <ul style="list-style-type: none"> - based on a detailed chemical and physical analysis of a representative sample of the prohibited waste being treated; - contain all information necessary to treat the waste; - filed with the EPA Regional Administrator; and - require wastes shipped off-site to comply with the notification requirements of 40 CFR 268.7(a)(2)? 	<p>N/A</p>		
<p>40 CFR 268.7 (a)(5)</p>	<p>If a generator determines whether a waste is restricted, based solely on his knowledge of the waste, is all supporting data used to make this determination retained on-site in the generator's files?</p>	<p>N/A</p>		
<p>40 CFR 268.7 (a)(5)</p>	<p>If a generator determines whether a waste is restricted based on testing the waste or an</p>	<p>YES</p>		

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	(Continuation) extract developed using TCLP, are all waste analysis data retained on-site in the generator's files?			
40 CFR 268.7 (a)(6)	If the generator determines that it is managing a restricted waste that is excluded from the determination of hazardous or solid waste or exempt from subtitle C regulation under 40 CFR 261.2-261.6 subsequent to the point of generation, does the generator place a one time notice stating such generation, subsequent exclusion from the definition of hazardous or solid waste or exemption from subtitle C regulation and the disposition of the waste in the facility's file?	N/A		
40 CFR 268.7 (a)(7)	Does the generator retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to the land disposal restriction of this section for at least 5 years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal (The 5 year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator)?	YES		
40 CFR 268.7 (a)(8)	If the generator is managing a Lab pack that contains wastes identified in Appendix IV and wishes to use the Alternate Standard under 40 CFR 286.420 with each shipment of waste, does the generator submit a notice to the treatment facility in accordance with 40 CFR 286.7(a)(1).	N/A		
40 CFR 286.7 (a)(9)	If the generator is managing a Lab pack that contains organic wastes specified in Appendix V and wishes to use the alternate treatment standards under 286.42, with each shipment of waste, does the generator submit a notice to the treatment facility in accordance with 40 CFR 286.7(a)(1).	N/A		
40 CFR 268.30 (a)&(b) - and - 40 CFR 268.31 - and - 40 CFR 268.32	Are the following wastes prohibited from land disposal unless they meet the standards of 40 CFR 268 subpart D or unless granted an exemption or extension pursuant to 40 CFR 268.5 or 268.6: - F001-F005 solvent waste; - F001-F005 solvent wastes which are contaminated solid and debris resulting from a response action taken under section 104 or 106 of CERCLA, or a corrective action required under subtitle C of RCRA and the residues from treating these wastes; - F020-F023 and F026-F028 waste; - remaining California List wastes (except in injection wells): * liquid hazardous waste having a pH less than or equal to 2 * liquid hazardous waste containing polychlorinated biphenyls (PCBs) at concentrations greater than or equal to 50 ppm * liquid hazardous wastes that are primarily	YES		

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	<p>(Continuation)</p> <p>water and contain halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1000 mg/l and less than 10,000 mg/l HOCs;</p> <ul style="list-style-type: none"> - liquid hazardous waste that contains HOCs in total concentrations greater than or equal to 1000 mg/l and are not prohibited under 40 CFR 268.32(a)(3); and - non-liquid hazardous waste containing HOCs in total concentrations greater than or equal to 1000 mg/l and are not waste described under 40 CFR 268.32(d)? 			
40 CFR 268.40 (a)	Are wastes identified in the table "TREATMENT STANDARDS FOR HAZARDOUS WASTES" land disposed only if it meets the requirements found in the table.	YES		
40 CFR 268.40 (c)	Are restricted wastes identified in 268.43 land disposed only if the constituent concentrations in the wastes or treatment residues of the wastes do not exceed the value shown in Table CCW of 40 CFR 268.43 for any hazardous constituent listed in Table CCW for the wastes?	YES		
40 CFR 268.42 (a)(1),(2), & (3)	<p>Are the following wastes treated using the identified technology or an equivalent method approved by the EPA Administrator:</p> <ul style="list-style-type: none"> - liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm but less than 500 ppm (INCIN or burned in high efficiency boilers); - liquid hazardous wastes containing PCBs at concentrations greater than or equal to 500 ppm (INCIN); - non-liquid hazardous wastes containing halogenated organic compounds (HOCs) in total concentration greater than or equal to 1000 mg/kg (INCIN); - liquid HOC-containing waste that are prohibited under 40 CFR 268.32(e)(1), California List (INCIN); - a mixture consisting of wastewater, the discharge of which is subject to regulation under either 402 or section 307(b) of the CWA, and de minimis losses of materials from manufacturing operations in which these materials are used as raw materials or are produced as products in the manufacturing process, and that meet the criteria of the D001 ignitable liquids containing greater than 10% total organic constituents (TOC) subcategory (DEACT); and - wastes identified in Table 2 and 3 of 40 CFR 268.42? 	YES		
40 CFR 268.45 (a)	<p>Are hazardous debris treated prior to land disposal as follows unless EPA determines that the debris is no longer hazardous or is treated to waste specific treatment standards:</p> <ul style="list-style-type: none"> - Treated for each "containment subject to treatment" using technology or technologies in Table 1 of 268.45. - Deactivate hazardous debris exhibiting the 	YES		

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	<p>(Continuation)</p> <p>characteristic of ignitability, corrosivity or reactivity using one of the technologies in Table 1 of 268.45.</p> <ul style="list-style-type: none"> - Achieve treatment standards for each type of debris contained in a mixture of debris type using one or more treatment technologies identified in Table 1 of 268.45. - Debris contaminated with two or more contaminants are treated for each contaminant using one of the technologies in Table 1 of 268.45. - Hazardous debris contaminated with PCB's are treated using one of the technologies in Table 1 of 268.45. If the requirements of this subpart is more stringent than 40 CFR 761. <p style="text-align: center;">PERMITTED FACILITIES</p>			
40 CFR 268.50 (a)(1)	Is the storage of hazardous wastes which are restricted from land disposal prohibited, unless the wastes are stored in tanks or containers on site solely for the purpose of the accumulation of such quantities as necessary to facilitate proper recovery, treatment, or disposal, and the generator complies with 40 CFR 262.34?	N/A		
40 CFR 268.50 (a)(2)	<p>If an owner of a hazardous waste TSD facility stores wastes in tanks or containers on site solely for the purpose of the accumulation of such quantities as necessary to facilitate proper recovery, does treatment or disposal comply with the following:</p> <ul style="list-style-type: none"> - each container is clearly marked to identify its contents and the date each period of accumulation began; - each tank is clearly marked with a description of its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, and/or such information is recorded and maintained in the operating record at the facility? 	N/A		
40 CFR 266.50 (b)	Does the owner of a TSD facility store wastes identified in 40 CFR 268.30,.31,.32,.7 for no more than one (1) year unless the Administrator can demonstrate that such storage was not solely for the purpose of the accumulation of such quantities as necessary to facilitate proper recovery, treatment or disposal?	N/A		
40 CFR 268.50 (c)	Does a TSD facility owner store waste identified in 40 CFR 268.30,.31,.32,.7 for no more than one year only if he can prove that such storage was solely for the purpose of the accumulation of such quantities as necessary to facilitate proper recovery, treatment or disposal?	N/A		
40 CFR 268.50 (f)	Is liquid hazardous waste containing PCBs at a concentration greater than or equal to 50 ppm stored at a facility that meets the requirements of 40 CFR 761.65, and removed from storage and treated or disposed within one year?	N/A		

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Auditor: JAMES WORTHY PANO KORDONIS

Date: 10/28/96 To 11/01/96

REGULATORY CITATION	AUDITOR'S CHECKLIST - HWASTE	Y/N N/A N/R	COMMENTS	FIND #
	(Continuation)			
40 CFR 279.10 (b)(2)	Does the Generator ensure that, if a used oil is mixed with a hazardous waste that exhibits a characteristic of hazardous waste, the mixture is subject to: - regulation as a hazardous waste rather than as used oil under this part, if the resultant mixture exhibits any characteristics of hazardous waste; or - regulation as a used oil, if resultant mixture does not exhibit any characteristics of hazardous waste; or - regulation as used oil, if the mixture is of used oil and waste which is hazardous solely because it exhibits the characteristic of ignitability.	N/A		
40 CFR 279.10 (b)(3)	Does the Generator ensure that mixtures of used oil hazardous waste are subject to regulation as used oil under this part?	N/A		
40 CFR 279.10 (c)	Does the Generator ensure that mixtures of used oil and nonhazardous solid waste subject to regulation as used oil under this part?	YES		
40 CFR 279.10 (d)(1)	Are mixtures of used oil and fuel or other products subject to regulation as used oil under this subpart? (except as provided in paragraph 279.10 (d)(2)	YES		
40 CFR 279.10 (d)(2)	Prior to mixing used oil and diesel Fuel, is the used oil subject to requirements for used oil generators?	N/A		
40 CFR 279.10 (e)(2)	Are materials produced from used oil that are burned for energy recovery subject to regulation as used oil ?	N/A		
40 CFR 279.10 (g)	Is used oil that is place directly into a crude oil or natural gas pipeline subject to the management standards, prior to the point of introduction to the pipeline ?	N/A		
	USED OIL SPECIFICATIONS	N/A		
40 CFR 279.11	Does the Generator ensure that used oil burned for energy recovery, and any fuel produced from used oil by processing, blending, or other treatment, is subject to regulation under this part unless shown not to exceed any of the allowable levels of the constituents and properties in the specification shown in the table below ? ----- Constituent/property Allowable Level ----- Arsenic..... 5 ppm max Cadmium..... 2 ppm max Chromium..... 10 ppm max Lead..... 100 ppm max Flash point..... 100 F min Total halogens..... 4,000 ppm max -----			
40 CFR 279.12	Does the Generator ensure the used oil is not	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - HWASTE	Y/N N/A N/R	COMMENTS	FIND #
(a)	(Continuation) managed in surface impoundments or waste piles unless the units are subject to the regulation for owners and operators of permitted hazardous waste facilities ?			
40 CFR 279.12 (b)	Is used oil prohibited from use as a dust suppressant ?	YES		
40 CFR 279.12 (c)	Is off-specification used oil fuel burned for energy recovery in only the following devices ? - industrial furnaces; - boilers; - hazardous waste incinerators.	N/A		
	STANDARDS FOR USED OIL GENERATORS	YES		
40 CFR 279.21 (a)	Does the generator ensure that HW is not mixed with used oil except as provided in 40 CFR 279.10 (b) ?			
40 CFR 279.22 (a)	Is used oil not stored in units other than tanks or containers ?	YES		
40 CFR 279.22 (b)	Are containers and aboveground tanks used to store used oil: - in good condition; - not leaking (no visible leaks)	YES		
40 CFR 279.22 (c)(1)	Are containers and aboveground tanks clearly labeled with the words "USED OIL".	YES		
40 CFR 279.22 (c)(2)	Are fill pipes used to transfer used oil to underground storage tanks labeled or marked clearly with words "USED OIL".	N/A		
40 CFR 279.22 (d)	Upon detection of a release to the environment not subject to the requirements of part 280, subpart F which has occurred after the effective date of the authorized used oil program for the state in which the release is located, does the generator perform the following cleanup steps: - stop the release; - contain the released used oil; - cleanup and manage properly the released used oil and other material; - repair or replace any leaking used oil storage containers or tanks prior to returning them to service.	N/A		
40 CFR 279.23 (a)	Does the generator only burn used oil in fired space heaters when: - the heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourself used oil generators; - the heater is designed to have a maximum capacity of not more than 0.5 million Btu per hour; and - the combustion gases from the heater are vented to the ambient air.	N/A		
40 CFR 279.24	Except as provided in paragraphs (a) through (c) of this section, does the generator ensure that used oil is transported only by transporters who	YES		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - HWASTE	Y/N N/A N/R	COMMENTS	FIND #
40 CFR 279.31 (b)	<p>(Continuation) have obtained EPA identification numbers ?</p> <p>Does the owner or operator of a do-it-yourself used oil collection center/point:</p> <ul style="list-style-type: none"> - comply with the generator standards previously described; and - Is the owner or operator registered/licensed/ permitted/recognized by a state/county/ municipal government to manage used oil. 	N/A		
40 CFR 279.60 (b)	<p>STANDARDS FOR USED OIL BURNERS WHO BURN OFF-SPECIFICATION USED OIL FOR ENERGY RECOVERY</p> <p>If the used oil burner conducts the following activities, the used oil burner is also subject to the requirements of other applicable provisions of the part as indicated below:</p> <ul style="list-style-type: none"> - burners who generate used oil must also comply with generator standards described above; - burners who transport used oil must comply with the standards for used oil transporters and transfer facilities; - except as provided in 40 CFR 279.61(b), burners who process or re-fine used oil must comply with the standards for used oil processors and re-refiners; - burners who direct off-specification used oil from their facility to a used oil burner or first claim that used oil that is to be burned for energy recovery meets the used oil fuel specifications set for in 40 CFR 279.11 must comply with the standards for used oil marketers; and - Burners who dispose of used oil, including the use of used oil as a dust suppressant, must comply with the standards of reuse as a dust suppressant and disposal of used oil. 	N/A		
40 CFR 279.61 (a)	<p>Does the Generator ensure that off specification used oil is burned for energy recovery only in the following devices;</p> <ul style="list-style-type: none"> - industrial furnaces identified in 260.10; - industrial boilers located on the site of a facility engaged in a manufacturing process where substances are transformed into new products, including the component parts or products, by mechanical or chemical processes; - utility boilers used to produce electric power, steam, heated or cooled air, or other gases or fluids for sale; or - used oil-fired space heaters provided that the burner meets the provisions of 40 CFR 279.23; - hazardous waste incinerators subject to regulation under subpart O of parts 264 or 265 of this chapter. 	N/A		
40 CFR 279.62 (a)	<p>Does the used oil burner have an EPA identification number ?</p>	N/A		
40 CFR 279.64	<p>Does the used oil burner comply with all applicable Spill Prevention, Control and</p>	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - HWASTE	Y/N N/A N/R	COMMENTS	FIND #
	(Continuation) Countermeasures ?			
40 CFR 279.64	Does the used oil generator comply with the underground storage tank standards for used oil in underground storage tanks whether or not the used oil exhibits any characteristics of hazardous waste ?	N/A		
40 CFR 279.64 (a)	Does the used oil burner only store used oil in tanks, containers, or units subject to regulation under parts 264 and 265 of this chapter ?	N/A		
40 CFR 279.64 (b)	Are containers in good condition with no visible leaks ?	N/A		
40 CFR 279.64 (c)	- Are containers used to store used oil at burner facilities equipped with secondary containment ? - Is secondary containment equipped with dikes, berms, or retaining walls; and - a floor that covers the entire area within the dike, berm, or retaining wall ?	N/A		
40 CFR 279.65 (a)	Does the used oil burner keep a record of each used oil shipment accepted for burning ?	N/A		
40 CFR 279.65 (b)	Are the records described above maintained by the used oil burner for at least three years ?	N/A		
40 CFR 279.66 (a)(1)&(2)	Before the burner accepts the first shipment of off-spec used oil fuel, does the burner provide to the generator, transporter or processor/ refiner a one time written and signed notice certifying that: - the burner has notified EPA stating the location and general description of his used oil management activity; and - the burner will burn the used oil only in an industrial furnace or boiler identified in 40 CFR 279.61(a)	N/A		
40 CFR 279.82 (a)	Is used oil not used as a dust suppressant unless the state has the approval of the EPA to do so ?	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - IR	Y/N N/A N/R	COMMENTS	FIND #
CERCLA 103 - and - 40 CFR 300.405 40 CFR 300.410 40 CFR 302	If a release or threatened release has occurred above reportable quantities (as noted in 40 CFR 302), has the activity notified the National Response Center (NRC) and performed a Preliminary Assessment (PA)? NOTE: Deadline to submit PA to EPA (via PA Report and Form T2070) was Jan 88 for past releases.	N/A		
40 CFR 300.410 (a)	Has a Site Inspection (SI - also known as a Confirmation Study) or Phase 1 RFI(RCRA Facility Investigation) been completed at each site recommended for further study by the Preliminary Assessment (PA - also known as an Initial Assessment Study [IAS]) or RFA (RCRA Facility Assessment)? NOTE: The SI report must be submitted to EPA and the State along with Form R2070-3 (SI Form). CERCLA 116(a)(2) required completion of the SI by 1 Jan 88.	YES	Those not completed are scheduled and are programmed for funding.	
CERCLA 120(d)	Has the activity provided EPA with information adequate to compute a Hazardous Ranking System (HRS) score?	YES		
CERCLA 120(f)	Has the facility provided for State, Federal, and Local entity participation in the CERCLA program? NOTE: The facility should provide copies of investigation work plans and reports to State and Federal agencies for review and comments.	YES		
40 CFR 300.400 (d)	Has the activity allowed access by EPA or other appropriate Federal, State, or Local entity acting to determine the need for response, or otherwise enforcing CERCLA?	YES		
NIRP 5-2	Does the Remedial Investigation/Feasibility Study (RI/FS) or RFI Phase 2/CMS (RCRA Facility Investigation/Corrective Measure Study) conform to the following: - follows a written sampling and analysis plan reviewed by EPA and State; - has a written health and safety plan (29 CFR 1910.120); and - Has a baseline Risk Assessment Begun? - Have the 9 NCP criteria been met?	YES		
40 CFR 300.800 NAVINST 5090.1B	If an Administrative Record (AR) has been established, installations are responsible to ensure the administrative record is available in an information repository and is at a location accessible to the public? NOTE: Establishment of an Administrative Record (AR)/Information Repository is a NAVFAC responsibility and requirement per NAVINST 5090.1B-15-4.8 for all CERCLA sites. It should be initiated as soon as the SI shows that the program will move into the RI/FS phase (NAVINST 5090.1B-15-5.10).	YES	Under the Base Realignment and Closure Act of 1993, all remedial actions at NAVBASE Charleston will be conducted under RCRA. The Base Closure Team has implemented an information repository in lieu of an Administrative Record. The repository is located at the County Library on Dorchester Road.	

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REGULATORY CITATION	AUDITOR'S CHECKLIST - IR	Y/N N/A N/R	COMMENTS	FIND #
	(Continuation) Assure Administrative Record Index is available and up to date.			
CERCLA 120(e) (1)	If the activity becomes listed on the NPL, has a Remedial Investigation/Feasibility Study (RI/FS) been initiated within six months of the listing?	N/A		
NAVINST 5090.1B 15-3.18, 4,10, 15-5.12, 13	If the activity is in the Remedial Investigation/ Feasibility Study (RI/FS) phase and a threat of release has been confirmed, has a Restoration Advisory Board(RAB) been established? NOTE: NAVINST 5090.1B 15-5.1 suggests the following list of participants: representation from the EPA, appropriate state and local authorities, federal and state natural resources trustees, representatives (including a co-chair) from the community, and Navy participants from the activity and the EFD.	YES		
NAVINST 5090.1B 15-3.18	Has an attempt been made to convert the former TRC to a RAB? Note: 15-5.13, 5.13.1-.6 describe how the conversion may take place.	YES		
CERCLA 113(k) (2) and 117(a) and (b) - and - 40 CFR 300.415 - and - 40 CFR 300.430 - and - NAVINST 5090.1B 15-4.9,15-5.11	Has public participation been pursued, and has the activity developed and implemented a written Community Relations Plan (CRP) for the Remedial Investigation/Feasibility Study (RI/FS) as well as for the removal and Remedial Action (RA) phases of the CERCLA Program or for the RCRA Facility Investigation (RFI), Interim Measure (IM) and Corrective Action (CA) phases of the RCRA Corrective Action Program?	YES		
CERCLA 104(i) (6)(a)	Has the activity ensured that the Agency for Toxic Substances and Disease Registry (ATSDR) has performed a health assessment on all sites on the National Priorities List (NPL)? NOTE: The assessment should begin within one year of the NPL listing and shall be completed to the extent possible before the end of the RI/FS (OPNAVINST 5090.1B 15-4.12) phase. This is accomplished through the supporting EFD as per NIRP Sec. 12.10.	N/A		
40 CFR 300.600	If natural resources are or may be injured by a release, has the installation notified the State and Federal trustees of the affected natural resources?	YES		
CERCLA 120(e) (2) - and - NIRP Manual	If the activity is on the NPL, has it entered into a Federal Facilities Interagency Agreement (FFA/IAG) with the State and EPA?	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - IR	Y/N N/A N/R	COMMENTS	FIND #
- and- NAVINST5090.1B 15-4.14, 5.16, 5.18	(Continuation) NOTE: Must be completed within 180 days after signing the Record of Decision (ROD), per CERCLA 120 (e)(2). Have the schedules, reports, and notifications required in the agreement been maintained?			
40 CFR 300.515 (e) - and - NAVINST 5090.1B 15-4.13, 5.17	Has the activity signed the Record of Decision (ROD) that describes the remedial measures to be taken at the IR sites, and was the public involved in the ROD selection?	N/A		
CERCLA 120(e) (2)	Within 15 months of signing the Record of Decision (ROD), has the activity begun substantial, continuous, physical, on-site remedial action?	N/A		
NAVINST 5090.1B 15-5.20	At sites under going remediation, has the activity with NAVFAC assistance planned for operation and maintenance (O&M) costs needed at the completion of remediation? NOTE: O&M activities are eligible for DERA funds until the RA is completed.	N/A	Remedial action has not occurred, however, Operations and Maintenance funds are being programmed for future work.	
40 CFR 300.150	Has the activity developed an occupational safety and health program and assured the employees have had proper training as set forth in 29 CFR 1910.120. Assure workers in and around a remediation area are thoroughly acquainted with the health and safety plan.	YES	CSO employees visiting remediation sites have had appropriate training. Copies of training records are maintained at CSO and SOUTH DIV Code 05 office.	
CERCLA 120(h) NAVINST 5090.1B15-5.26	If the facility has transferred or exceded any real property, has it included in the real-property documents a full discussion of the release of any hazardous substances on the property and any remedial activities that have occurred?	YES		
CERCLA 120(e) (3)	Has the activity submitted an annual budget to Congress via a PCR? NOTE: Included in this PCR is a statement of the hazard posed by the facility to human health, welfare, and the environment, and the consequences for no remedial action occurring due to lack of funding. This budget/report PCR is handled through EFDs. Each installation must ensure that a PCR has been submitted to NAVFAC via the EFD for each phase [PA/SI, RI/FS, RD/RA] of the IR program.	N/A	Budget submission for EFD or activity does not require PCR for DERA and BRAC.	
CERCLA 120(e) (5)	Has the activity submitted to Congress an annual report concerning CERCLA programs? NOTE: This is accomplished through NAVFAC and EFDs. Activity appears on the Federal Agency Hazardous Waste Compliance (FAHWC) Docket if a release or	YES		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - IR	Y/N N/A N/R	COMMENTS	FIND #
	(Continuation) threatened release has occurred above the reportable quantities noted in 40 CFR 302.			
NIRP Manual	Has the activity included a PCR for IR salary support at the installation if required (e.g., IR Coordinator, Community Relations, etc.)?	N/A	Budget submission from EFD does not require PCR for DERA and BRAC.	
HSWA 3004(u)	Is the activity in compliance with all HSWA Permit conditions (e.g., does the activity notify EPA of any additional solid waste management units (SWMUs) discovered, as required on the HSWA permit)?	YES		
CERCLA 120 (a) (3)	Has the activity complied with applicable state regulations regarding removal and remedial actions?	YES		
40 CFR 300.515 (h) (2)	Have ARAR's and TBC's been requested from the support agencies?	YES		
40 CFR 300.425 (b)	Have engineering evaluations and cost analyses or equivalents been conducted for removal actions with a greater than six month planning period?	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - NEPA	Y/N N/A N/R	COMMENTS	FIND #
32 CFR 775.3 (a) - and - 40 CFR 1500.2 and .5 - and - OPNAVINST 5090.1B 2-5.2 (a)	Is environmental documentation prepared at the earliest stages of project planning and review for construction project (such as buildings, roads, pipelines, airfields, etc.), and/or for equipment/process/R&D testing changes that could have significant impact on the environment?	YES	All necessary documentation associated with base closure has been prepared. As this is a closing facility, no further activities are expected to require NEPA documentation. Documentation for the annex property is currently being developed as appropriate.	
40 CFR 1502.6 - and - OPNAVINST 5090.1B 2-5.2(b)	Is environmental documentation prepared by individuals with relevant interdisciplinary technical background (natural resources, environmental, social sciences, etc.)?	YES	This has been appropriately addressed in the past and will be for the annex property. No further activities expected in the future to require this effort.	
OPNAVINST 5090.1B 2-2.1(a)	Is environmental documentation (Environmental Assessment, Environmental Impact Statements) made available to the public and decision makers before decisions are made and major Federal actions are taken?	YES		
40 CFR 6.107 - and - OPNAVINST 5090.1B 2-4.1 and .2	Are categorical exclusions documented for actions which do not have significant effect on the environment and do not require an Environmental Assessment (EA) or Environmental Impact Statement (EIS)?	YES		
40 CFR 1500.4 and .5 - and - 40 CFR 1501.4 - and - OPNAVINST 5090.1B 2-3.8	Is a Finding of No Significant Impact (FONSI) prepared and forwarded to OP-44E when a non-excluded action is determined to have no significant effect?	YES		
40 CFR 1500.4 (n) - and - 40 CFR 1502.6 - and - OPNAVINST 5090.1B 2-4.4.7	Does the activity cooperate to the fullest extent practicable with Federal, State, and Local agencies to reduce duplication between NEPA and State and Local requirements through joint: - planning; - environmental research and studies; - public hearings; - Environmental Assessments; and - Environmental Impact Statements?	YES		
OPNAVINST 5090.1B 2-6.3(a)	Does the activity and/or the action proponent ensure projects and programs include funding for environmental documentation?	YES		
OPNAVINST 5090.1B 2-6.3(d)	For every action where an Environmental Assessment (EA) or Environmental Impact Statement (EIS) has been completed, has the activity completed all mitigation and monitoring required by the Finding Of No Significant Impact (FONSI) or Record of Decision (ROD) for that action?	YES		
OPNAVINST 5090.1B 2-6.3(f)	Has the activity developed a sense of environmental responsibility and awareness of NEPA requirements among personnel who are engaged in planning, design, or construction of any undertaking which has the potential to have an impact on the environment.	YES	Activity is aware of NEPA requirements and will ensure compliance should any future projects necessitate action.	

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REGULATORY CITATION	AUDITOR'S CHECKLIST - OHS	Y/N N/A N/R	COMMENTS	FIND #
	OIL DISCHARGE/RELEASE OF A HAZARDOUS SUBSTANCE	YES	Minor spills have occurred and were reported.	
40 CFR 300.125	Has notice of any oil discharge or release of a hazardous substance exceeding the reportable quantity been made to the National Response Center (NRC) in accordance with 33 CFR 153 or 40 CFR 302?			
40 CFR 300.150	Do OHS Facility Response Plans include the employee health and safety training required by 29 CFR 1910.120?	N/A	See OHS General Comment 1.	
40 CFR 300.150	Do response contracts require compliance with 29 CFR 1910.120 and other OSHA regulations?	NO	40 CFR 300.150 states that response contracts must identify requirement for compliance with 29 CFR 1910.120 and other pertinent OSHA regulations. Review of Fenn Vac contract did not reveal these requirements.	OHS 001
29 CFR 1910.120(q)(6)	Have employees who are expected to participate in an emergency response received one or more of the following appropriate levels of training: - first responder awareness level; - first responder operations level; - hazardous materials (HAZMAT) technician; - HAZMAT specialist; or - On-scene incident commander	YES	The response personnel for the CSO office have had this training. Unable to identify if response contractor personnel have this training.	
29 CFR 1910.120(q)(6)(i)	Do emergency response employees receive annual refresher training, or demonstrate their competency yearly?	YES	CSO personnel do. Unable to ascertain if contractor personnel do.	
29 CFR 1910.120(q)(6)(ii)	Are records of yearly training or statements of competency maintained for emergency response personnel?	YES	CSO personnel do but unable to identify if response contractor personnel do.	
29 CFR 1910.120(q)(9)(i)	Are members of designated hazardous material (HAZMAT) teams and HAZMAT specialists provided with a baseline physical and enrolled in a medical monitoring program?	YES		
29 CFR 1910.1200(e)	Does the activity have a written HAZCOM program that: - ensures appropriate labeling of hazardous chemicals; - provides easy access to MSDSs; - provides adequate training to inform employees of chemical hazards; - maintains an up-to-date inventory of hazardous chemicals referenced to the appropriate MSDS; - describes the methods that will be used to inform employees of non-routine tasks and the hazards associated with chemicals contained in any un-labeled piping?	YES		
OPNAVINST 5090.1B 10-5.5 - and - 10-6.5(e)	Have the Facility Incident Commander (FIC)/ (NOSCDR) and On-Scene Operation Team (OSOT) members received initial, specialized operational response training to familiarize them with the technical, organization, and operational aspects of OHS pollution response; and have these personnel received refresher training consistent with changes in duty assignments, and changes in OHS spill cleanup procedures and requirements?	YES		
OPNAVINST 5090.1B	If this is an activity where the Commanding Officer has been designated as a Regional Incident	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - OHS	Y/N N/A N/R	COMMENTS	FIND #
10-5.5	(Continuation) Commander/Navy on Scene Commander RIC/(NOSC), has the RIC/(NOSC) received initial, specialized operational response training to become familiar with the technical, organizational, and operational aspects of OHS pollution response; and has the RIC/(NOSC) also received refresher training consistent with changes in duty assignments, and changes in OHS spill cleanup procedures and requirements?			
OPNAVINST 5090.1B 10-6.2(a)-(i)	Has the RIC/(NOSC): - predesignated shoreside RICs/(NOSCDRs) and assigned geographic areas for response; - directed all major response efforts for Navy DHS spills within assigned boundaries; and - served as the Federal On-Scene Coordinator (OSC) for Navy hazardous substance releases within assigned geographic boundaries; - coordinated response operations with adjacent RICs/(NOSCs) for Navy OHS spills which impacted or had the potential to impact more than one RIC/(NOSC) region; - coordinated any major response efforts with the DOD representative to the Regional Response Team (RRT); - coordinated shoreside RIC/(NOSC) plans with fleet planning and operations and ensured that SOPA instructions contain guidance for fleet OHS spill response consistent with the shoreside RIC/(NOSC) plans; and - ensured that all Federal, State, and local OHS spill notification procedures were followed?	N/A		
40 CFR 300.120	For RICs/(NOSCs), has a hazardous substance Regional Response Plan been developed; and has the plan been coordinated with the Regional Response Team (RRT) and local and State representatives?	N/A		
40 CFR 300.135 (g)	Did the RIC/(NOSC) immediately notify FEMA of situations requiring evacuation, temporary housing, or permanent relocation?	N/A		
40 CFR 300.135	Did the RIC/(NOSC) consult with DOI or NOAA where a release had the potential to adversely affect any threatened or endangered species or their habitat?	N/A		
40 CFR 300.135 (m)	Did the RIC/(NOSC) submit periodic pollution reports to the Regional Response Team (RRT) during a major incident?	N/A		
40 CFR 300.135 (n)	Did the RIC/(NOSC) ensure that all appropriate public and private interests were kept informed during a spill event to the extent practicable?	N/A		
40 CFR 300.160 - and - 40 CFR 300.165	Did the RIC/(NOSC) submit an OSC report, as outlined in 40 CFR 300.165, to the Regional Response Team (RRT) and the National Response Team (NRT) within one year of a major release of a hazardous substance?	N/A		
40 CFR 300.210 (c)(1)	Is the RIC/(NOSC) Regional Response Plan (RRP) coordinated with State Emergency Response Commissions (SERCs) and Local Emergency Planning	N/A		

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40 CFR 112	<p>(Continuation) Committees (LEPCs) affected by the RIC/(NOSC) area of responsibility?</p> <p>OIL POLLUTION ACT OF 1990: (FOR FACILITIES WHICH MEET EPA'S SUBSTANTIAL HARM CRITERIA ONLY)</p> <p>Has the facility submitted an OPA 90 Facility Response Plan to the EPA?</p> <p>NOTE - SUBSTANTIAL HARM CRITERIA: - If the total storage capacity is greater than 42,000 gallons and the operation includes over water transfers of oil to and from vessels; - if the facility has a total storage capacity of one million gallons or greater and there is no secondary containment for each aboveground storage area sufficiently large to contain the capacity of the largest above ground storage tank (manifolded tank volumes are considered as one tank volume); - if the facility has a total storage capacity of one million gallons or greater and there is no secondary containment for each aboveground storage area sufficiently large to contain the capacity of the largest aboveground storage tank (manifolded tank volumes are considered as one tank volume); and - the facility is located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments or shut down a public drinking water intake; - or the facility has had a reportable spill in the amount equal to or greater than 10,000 gallons within the past five years;</p>	YES	See OHS General Comment 1.	
40 CFR 112	If an activity has made substantial changes to the oil handling/storage portion of the facility, has the facility resubmitted revised portions of the Facility Response Plan (FRP) to the EPA within 60 days of the change occurrence?	N/R	See OHS General Comment 1.	
40 CFR 112	Has the facility updated the Facility Response Annually?	YES		
40 CFR 112	Has the facility forwarded a copy of the annual Facility Response Plan (FRP) to the EPA?	YES		
40 CFR 112	<p>Does the Facility Response Plan (FRP) identify and describe the following information:</p> <ul style="list-style-type: none"> - the name and phone number of qualified response individual(s); - local/state/federal officials required to be notified during a spill? (ie NTR-EPA, MTR-Coast Guard, etc.); - the facilities response equipment and it's location; - the response personnel duties during a spill and their response times; - evacuation plans for the facility; - immediate measures to secure the source of the discharge and to provide adequate containment 	YES		

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	<p>(Continuation)</p> <ul style="list-style-type: none"> - of spilled oil; - diagram of the facility; - Naval/Private organizations that will respond up to and including medium/maximum most probable spill; - contracts with private organizations or memorandum of agreements with Non-Naval (Government) activities which will respond in the event of a medium/maximum most probable spill; - description form for information (ie including the character, exact source, amount, and extent of the release) to fill out and then pass to response personnel in the event of a spill. - instructions to assess and implement prompt removal actions to contain and remove the substance that has been released; - hazard evaluation which identifies the history of spills for the life of the facility and identify where discharges could occur and potential effects (ie Tank numbers and their associated volumes); - discussion on the WCD, medium/most probable discharge and small discharge scenario volumes; - equipment to be used for each scenario; - disposal methods for the contaminated cleanup material; - a checklist and record of inspection for tanks, secondary containments, and response equipment; - a description of the drill/exercise program to be carried out under the response plan; - a description of the training program to be carried out under the response plan; - include logs that will be used for discharge prevention meetings, training sessions, and drills/exercises; - a site plan and drainage plan diagrams; - a description of the facility security system. 			
40 CFR 112	Has the facility determined the worst case discharge volume in accordance with Appendix D of 40 CFR 112 ?	YES		
40 CFR 112	For a small discharge has all of the following response equipment been identified? (A) 1,000 feet of containment boom. (B) Oil recovery devices with an Effective Daily Recovery Capacity equal to the small discharge volume (2100 gallons). (C) Temporary Oil Storage Capacity equal to twice the small discharge volume.	YES	Assuming response contractor has this equipment.	
40 CFR 112	Does the facility identify where response equipment can be obtained?	YES		
40 CFR 112	For a medium discharge has all of the following equipment been identified: - adequate containment boom to contain a medium spill (a medium spill is equivalent to 36,000 gallons of oil or 10% of WCD which ever is less) to keep spill from entering	YES	See above comment.	

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	(Continuation) sensitive environments as identified in ACP? - oil recovery devices with an effective daily recovery capacity equal to 50% of the medium discharge volume; - temporary oil storage capacity equal to the medium discharge volume?			
40 CFR 112	Does the facility identify where equipment for medium discharges can be obtained?	YES	If contractor has this capability.	
40 CFR 112	Has the facility identified the Tier 1,2 and 3 discharge volumes for the WCD?	N/R	See OHS General Comment 1.	
40 CFR 112	Has the facility identified the response resources necessary to meet the tiered WCD volumes? NOTE: The tiered planning volumes for the WCD constitutes the tiered required daily recovery capacity. If the tiered volumes exceed the applicable contracting CAP of Table 5 of Appendix D of 40 CFR 112, then the facility must identify response resources with capacity equal to twice the CAP listed in Tier 3 or the amount necessary to meet the WCD, whichever is least.)	N/R	See OHS General Comment 1.	
40 CFR 112	Has the facility identified where the response equipment, for each tier of the WCD, can be obtained (ie building on site, contractor, etc.)?	YES		
40 CFR 112	Does the facility identify the temporary storage requirements as being twice the tiered planning volume?	NO	40 CFR 112 regulation for identifying temporary storage is not in compliance.	OHS 002
40 CFR 112	Does the facility identify where the tiered storage equipment can be obtained (ie ___ Tank stored at Building ___, Contractor, etc.)	YES		
40 CFR 112	Does the facility identify the manufacturer model and effective recovery capacity of all facility owned/operated oil recovery devices.	YES	Contractor will furnish.	
40 CFR 112	Did the facility use paragraph 6.2 of Appendix E of 40 CFR Part 112 to determine the effective daily recovery capacity of facility owned/operated oil recovery devices?	YES	Contractor will provide	
40 CFR 112	Did the facility calculate the WCD based on the individual oil groups? Note: Only includes facilities where more than one oil group comprises more than 10% of the facilities total oil storage capacity.	YES		
40 CFR 112	Does the Facility Response Plan (FRP) identify the facilities fire fighting response resources?	YES		
40 CFR 112	If the facility handles group 1 through group 4 oils, has the facility plan identified a individual to contact in case of fire?	N/A		
40 CFR 112	Does the Facility Response Plan (FRP) address response procedures and equipment requirements to combat up to the "medium case" spill for non-marine transfer related (MTR) facilities or up	N/R	See OHS General Comment 1.	

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	(Continuation) to the "maximum most probable" spill for MTR facilities. "Medium case" spills are defined as 36,000 gallons or 10% of the capacity of the largest aboveground storage tank, whichever is less. "Maximum most probable" spills are defined as 50,400 gallons or 10% of the "worst case" spill, whichever is less.			
40 CFR 112	Does the FRP identify the facility's worst case spill scenario?	N/R	See OHS General Comment 1.	
40 CFR 112	Does the response plan contain sufficient information on the type and frequency of spill drills?	YES		
40 CFR 112	Have facilities identified in 40 CFR 112.20(a)(2) as having the potential to cause substantial harm to the environment prepared, and submitted to the Regional Administrator of the EPA, a Facility OHS Spill Response Plan (FRP)?	YES		
40 CFR 112	Does the RIC/(NOSC) RRP address response procedures and equipment requirements to combat the "worst case" spill scenario for the region?	N/A		

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OPNAVINST 5090.1B 11-5.5(a)(1)	Have all electrical transformers been tested for PCB by gas chromatography or other appropriate methods? NOTE: Test results (in ppm) shall be noted in activity records. Samples and test results shall be traceable to the equipment sampled.)	YES		
OPNAVINST 5090.1B 11-5.5(e)	Are all newly procured transformers, and other equipment containing dielectric or hydraulic fluid, accompanied by a manufacturer's certification that the equipment contains no PCB, or less than (2) ppm of PCB, at the time of shipment?	N/A		
OPNAVINST 5090.1B 11-5.5(e)	Do all newly procured transformers and equipment have a permanent manufacturer's label affixed stating the PCB concentration of any fluid contained within?	N/A		
OPNAVINST 5090.1B 11-5.5(c)	Does the activity have a PCB Elimination Plan, updated annually, which includes the following: - all PCB transformers, large PCB capacitors, electrical equipment, and other known PCBs; - funding source; - the elimination of all PCB transformer by October 1998; - the elimination of all PCB-contaminated transformers by October 2003; - the elimination of all higher secondary network PCB transformers near commercial building if they are not equipped with enhance electrical protection by October 1990; - the elimination of all lower secondary voltage PCB transformers near commercial buildings if they are not equipped with enhanced electrical protection by October 1990; and - the elimination of all large PCB capacitors by October 1998?	N/A		
OPNAVINST 5090.1B 11-5.6	If the activity is not 'PCB free', has every person 'Actively Involved' with PCBs and their supervisor received NAVOSH worker Right-To-Know training specifically addressing PCBs and PCB hazards including federal, state and local laws and regulations. (NOTE: 'Actively Involved' with PCB's includes any person who performs PCB inventories, repairs, maintains, replaces or tests PCB containers or suspected PCBs.)	N/A		
40 CFR 761.30 - and - OPNAVINST 5090.1B 11-6.5(f)	Has the extent of PCB use (e.g. transformers, capacitors, heat transfer systems, etc.) at the activity been identified, and does the activity complete or validated the following annual reports required by NFESC: - annual document log; and - annual inventory?	N/A		

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	(Continuation)			
	NOTE: The activity must write a letter to NFESC stating that is "PCB free".			
40 CFR 761.30 (a)(1)(i)	Has the activity verified there are not any PCB transformers, either in use or in storage, posing a risk to food or feed?	N/A		
40 CFR 761.30 (a)(1)(ii) and (a)(1)(iv)(c) through (a)(1)(v)	Have all PCB transformers in or near commercial building been removed or retrofitted? NOTE: OPNAVINST 5090.1B 9-5.7 defines "near" as within 30 meters.	N/A		
40 CFR 761.30 (a)(1)(iii)(A)	Does the activity ensure that no PCB transformers are installed, others than those retrofilled and reclassified? NOTE: PCB transformers in use or in storage may not be relocated or re-used. Also, PCB transformers could be installed as emergency substitutes from 1 Oct 85 through 1 Oct 90; however, they had to be removed within one year of their installation, or by 1 Oct 90, whichever was earlier. Emergency installations after 1 Oct 90 are prohibited.	N/A		
40 CFR 761.30 (a)(1)(iii)(C) (2)(iii)	Does the activity have the following documents within 30 days for retrofilled PCB transformers in service: - the date of installation; - the type of transformer installed; - the PCB concentration, if known, at the time of installation; and - the retrofit and reclassification schedule concentration?	N/A		
40 CFR 761.30 (a)(1)(iii)(C) (2)(iv)	Are retrofilled PCB transformer retested, to confirmed the reclassification, within three months after its retrofit? NOTE: The transformer must be in service before the retest.	N/A		
40 CFR 761.30 (a)(1)(iv)(C)	As of 1 October 1991, were all lower secondary voltage network PCB transformers in use in or near commercial buildings which have not been protected, and are not located in sidewalk vaults, registered, in writing, with the appropriate EPA Regional Administrator?	N/A		
40 CFR 761.30 (a)(1)(viii)	Have all combustible materials been removed from within a PCB enclosure (i.e. vault or partitioned area), within 5 meters of a transformer enclosure, or, if unenclosed (unpartitioned), within 5 meters of a PCB transformer?	N/A		
40 CFR 761.30 (a)(1)(ix)	Are visual inspections of PCB transformers, in service or stored for reuse, performed at least every three months?	N/A		

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	(Continuation) NOTE: 40 CFR 761.30(a)(1)(xiii) provides for a reduced inspection schedule if certain conditions are met.			
40 CFR 761.30 (a)(1)(x)	Have all leaking PCB transformers been repaired or replaced?	N/A		
40 CFR 761.30 (a)(1)(x)m	Are leaking PCB transformers: - cleaned up and disposed of in accordance with 40 CFR 761.60; - repairs and clean up begun as soon as possible, but no later than 48 hours after the leak was discovered; - inspected daily until repairs and/or removal is completed; and - contained to prevent exposure to humans and the environment; and are records kept, and are they available, on the leak, clean up and disposal of the transformer and other contaminated materials?	N/A		
40 CFR 761.30 (a)(1)(xi)	Were all fires involving PCB transformers reported to the National Response Center (1-800-424-8802), and were records kept documenting the phone call?	N/A		
40 CFR 761.30 (a)(1)(xi)	During and after the fire involving a PCB transformer were measures taken to contain and control any potential releases of PCBs and incomplete combustion products into water? NOTE: These measures may include, but are not limited to: (1) blocking off all floor drains in the vicinity of the transformer; (2) containing the runoff water; and (3) controlling and treating (prior to release) of any water used in subsequent operations	N/A		
40 CFR 761.30 (a)(1)(xv)	Are the inspection and maintenance histories kept for each PCB transformer for at least three years after it's disposal, are these records immediately available for inspection, and do these records contain at least the following information: - the location of the transformer; - the date of each inspection and the date the leak, if any, was discovered, if different from the inspection; - the person performing the inspection; - the location of the leak, if any; - an estimate of the dielectric fluid released from the leak, if any; and - the date of any clean up, containment, repair, or replacement; - a description of any clean up, containment, or repair performed; and - the results of any containment and daily inspection required for uncorrected active leaks?	YES		
40 CFR 761.30 (a)(1)(xv)	If any mineral oil transformers, which were assumed to contain less than 500 ppm of PCBs as provided in 40 CFR 761.3, are tested and found to contain 500 ppm or more of PCBs, were the	N/A		

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	<p>(Continuation) following requirement met:</p> <ul style="list-style-type: none"> - were all fires reported to the National Response Center; - was the transformer marked within 7 days after discovery; - was the vault door, machinery room door, fence, hallway or other means of access to the PCB transformer marked within 7 days after discovery; - was the PCB transformer registered, in writing, with the primary fire response personnel and the building owner within 30 days after discovery; - is electrical protection installed by 1 Oct 90, or within 18 months of discovery, whichever is later, on a radial PCB transformer in a non-sidewalk vault, lower secondary voltage network PCB transformer in use in or near a commercial building; - if electrical protection has not been installed on a non-sidewalk vault, lower secondary voltage network PCB transformer in use in or near a commercial building, will the transformer be removed within 18 months of discovery or by 1 October 1993, whichever is later; - will the lower secondary voltage network PCB transformer located in a sidewalk vault in use in or near a commercial building be removed within 18 months of discovery or by 1 October 1993, whichever is later; - in lieu of installing electrical protective equipment or removal will the radial or lower secondary voltage network PCB transformer be retrofilled and reclassified within 18 months of discovery or by 1 October 1990, whichever is later; - in lieu of installing electrical protection or removal will the lower secondary network PCB transformer located in a sidewalk vault in use in or near a commercial building be retrofilled and reclassified within 18 months of discovery or by 1 October 1993, whichever is later; and - in lieu of installing electrical protection or removal will the higher secondary voltage network PCB transformer be retrofilled and reclassified within 18 months of discovery or by 1 October 1990, whichever is later? 			
40 CFR 761.30 (a)(2)(i)	Are all transformer classified as PCB-contaminated serviced with a dielectric fluid containing less than 500 ppm of PCBs only?	N/A		
40 CFR 761.30 (a)(2)(iii)	Are steps being taken to insure that the dielectric fluid from PCB transformers is not being mixed with the dielectric fluid from PCB-contaminated transformers and then added back to the PCB transformer?	N/A		
40 CFR 761.30 (a)(2)(iv)	Are steps being taken to ensure that fluids containing more than 500 ppm of PCBs are not being mixed with fluids containing less than 500 ppm of	N/A		

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	(Continuation) PCBs? NOTE: Such mixtures are considered to have the concentration of the highest contaminated fluid and must be disposed of as a PCB fluid, regardless of any lab tests on the mixture.			
40 CFR 761.30 (a)(2)(vi)	Are all dielectric fluids containing more than 50 ppm of PCBs stored in accordance with the storage for disposal requirements of 40 CFR 761.65?	N/A		
40 CFR 761.30 (d)	As of 1 July 1984, was the PCB content of all heat transfer systems less than 50 ppm?	N/A		
40 CFR 761.30 (e)	As of 1 July 1984, was the PCB content of all hydraulic systems less than 50 ppm?	N/A		
40 CFR 761.30 (h)(1)	As of October 1985, were all electromagnets which posed a risk to food or feed and contained 500 ppm or more of PCBs removed from service?	N/A		
40 CFR 761.30 (h)(2)	Have all electromagnets, switches, and voltage regulators which contain more than 500 ppm of PCBs been removed and disposed of rather than being rebuilt at the end of their service life?	N/A		
40 CFR 761.30 (i)	Is the PCB concentration in compressors and in the liquid of natural gas pipelines less than 50 ppm and marked as required in 40 CFR 761.45(a)?	N/A		
40 CFR 761.30 (l)(1)(i)	As of 1 October 1988, have all large high and low voltage PCB capacitors which pose a risk to food or feed been removed?	N/A		
40 CFR 761.30 (l)(1)(ii)	As of 1 October 1988, has the use of all large high and low voltage PCB capacitors limited to a restricted-access substation or in a contained, restricted-access indoor installation that is capable of containing any PCB release?	N/A		
40 CFR 761.30 (m)(1)(i)	Are all circuit breakers, reclosers, and cables serviced with dielectric fluid containing less than 50 ppm of PCBs only?	N/A		
40 CFR 761.40	Are marking and labelling requirements for PCBs and PCB items (applies only to 50 ppm or more) for the following met: - PCB container; - PCB transformers; - PCB large high voltage capacitors; - equipment containing a PCB transformer or a large high voltage PCB capacitor; - large low voltage PCB capacitors, at the time of removal from use; - electrical motors using PCB coolants; - hydraulic systems using PCB hydraulic fluid; - heat transfer systems using PCBs; - PCB article containers containing articles or equipment that must be marked;	N/A		

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	<p>(Continuation)</p> <ul style="list-style-type: none"> - each storage area used to store PCBs and PCB articles for disposal; - transport vehicles when transporting PCB containers that contain more than 45 kilograms of PCBs in the liquid phase, or with one or more PCB transformer; and - the entrance to a PCB location such as the vault door, machinery room door, fence, hallway or other means of access? 			
40 CFR 761.45	Do the PCB and PCB-contaminated labels conform to the requirements of 40 CFR 761.45?	N/A		
40 CFR 761.60	Are PCBs and PCB-contaminated materials and items disposed of in an EPA approved incinerator, high efficiency boiler, or chemical waste landfill?	N/A		
40 CFR 761.65 (b)(1)	<p>Does the PCB storage facility meet the following requirements:</p> <ul style="list-style-type: none"> - an adequate roof and walls which will prevent rain water from reaching the stored PCB items; - an adequate floor which has a continuous six inch high curbing (the floor and curbing must provide a containment volume equal to at least two times the internal volume of the largest PCB article or PCB container stored, or 25 percent of the total internal volume of all PCB articles or PCB container stored, whichever is greater); - no drains valves, floor drains, expansion joints, sewer lines, or other opening that would permit liquids to flow from the curbed area; - floor and curbing constructed of smooth and impervious materials; and - located above the 100-year flood water elevation? 	N/A		
40 CFR 761.65 (c)(1)	<p>Are only the following stored in areas that do not comply with the requirements of 40 CFR 761.65(b):</p> <ul style="list-style-type: none"> - non-leaking PCB articles and equipment; - leaking PCB articles and equipment placed in a non-leaking PCB container that contains sufficient sorbent materials to absorb any remaining liquid PCBs; - PCB container containing non-liquid PCBs; and - PCB containers containing liquid PCBs at a concentration between 50 and 500 ppm, provided that a Spill Prevention, Control and Countermeasure (SPCC) Plan has been prepared for the temporary storage area in accordance with 40 CFR 112 (the container must be marked indicating that the liquid does not exceed 500 ppm)? <p>NOTE: The items may be stored only for 30 days. They must be marked with the date they were taken out of service.</p>	N/A		
40 CFR 761.65 (c)(2)	If any non-leaking and structurally undamaged large high voltage PCB capacitors and PCB-contaminated electrical equipment that have not been drained of free-flowing dielectric fluid are stored next to a facility that meets the	N/A		

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	(Continuation) requirements of section 40 CFR 761.65(b), are the following condition met: - are the item stored on pallets; - is the immediately available storage equal to 10 percent of the volume of the equipment and capacitors stored outside; and - are the equipment and capacitors inspected for leaks weekly?			
40 CFR 761.65 (c)(5)	Are the PCB items and containers in the storage facility inspected at least every 30 days?	N/A		
40 CFR 761.65 (c)(6)	Do the containers used to store PCBs meet DOT shipping container specifications?	N/A		
40 CFR 761.65 (c)(8)	Are the PCB articles and containers dated when they are placed in storage?	N/A		
40 CFR 761.79 (a)	Are all PCB containers disposed of, or are they decontaminated by: - flushing the internal surfaces of the container at least 3 times with a solvent containing less than 50 ppm of PCBs; - is the solubility of PCBs in the solvent at least 5 percent by weight; - is each rinse at least 10 percent of the container's volume (the solvent may be reused for decontamination until it contains 50 ppm of PCBs); and - are the solvents and non-liquid PCB disposed of in accordance with 40 CFR 761?	N/A		
40 CFR 761.79 (b)	If any mobile equipment in the PCB storage area becomes contaminated with PCBs, is it cleaned up by swabbing with a solvent that meets the requirements of 40 CFR 761.79(a)?	N/A		
40 CFR 761.120	Were all PCB spills that occurred before 4 May 1987 scheduled to be cleaned up as part of a Installation Restoration Site or other remedial action plan if not already cleaned up?	YES	PCB spills are being cleaned up to standards negotiated with EPA with SCDHEC concurrence.	
40 CFR 761.125 (a)(1)	Were all PCB spills and leaks occurring after 4 May 1987 reported to the EPA Regional Administrator (the Office of Pesticides and Toxic Substances) as soon as possible, but no later than within 24 hours if: - it directly contaminates surface water, sewers, or drinking water supplies; - it directly contaminates grazing lands or vegetable gardens; or - it exceed 10 pounds of PCB material (generally 1 gallon of PCB dielectric fluid)?	YES		
40 CFR 761.125 (a)(1)	Are all spills involving 10 pounds or more of PCB containing material reported to the National Response Center?	N/A		
40 CFR 761.125	Are all spills involving PCBs cleaned up in accordance with 40 CFR 761.120, .125, or other requirements specified by the EPA Regional Administrator, or state agency, as applicable?	N/A		
40 CFR 761.125	Is the clean up of all spills documented with the	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - PCB	Y/N N/A N/R	COMMENTS	FIND #
(b)(3)	<p>(Continuation) following records and certificates:</p> <ul style="list-style-type: none"> - the source of the spill; - the estimated or actual date and time the spill occurred; - the date and time the clean up was completed or terminated (if the clean up was delayed by an emergency or adverse weather; the nature and duration of the delay); - a brief description of the spill location; - precleanup sampling data used to establish the spill boundaries; - include a description of the sampling technique and methodology; - a brief description of the solid surfaces cleaned; - the approximated depth and amount of the soil excavated and the amount of soil removed; and - postcleanup verification sampling data; - certification statement signed by responsible party stating cleanup requirement met and the record is true to the best of their knowledge? <p>NOTE: These records must be kept for at least five years after the clean up was completed.</p>			
<p>40 CFR 761.180 (a) - and - OPNAVINST 5090.1B 11-5.2 - and - 11-6.5</p>	<p>Are annual PCB records kept and maintained in accordance with the following requirements:</p> <ul style="list-style-type: none"> - is a written document log of the deposition of PCBs and PCB items maintained; - is the written annual document log prepared by 1 July for the pervious calendar year; - is the annual document log maintained for 3 years after the activity disposes of all regulated PCBs and PCB items; and - are all annual document log and annual records available for inspection during normal working hours? 	N/A		
<p>40 CFR 761.180 (a)(1)</p>	<p>Do the annual PCB records include:</p> <ul style="list-style-type: none"> - all signed manifests generated during the calendar year; and - all Certificates of Disposal received during the calendar year? 	N/A		
<p>40 CFR 761.180 (a)(2)</p>	<p>Does the PCB annual document log include:</p> <ul style="list-style-type: none"> - the name, address, and EPA identification number of the activity and the year covered by the annual log; - the unique manifest number of every manifest generated by the activity during the calendar year and from each manifested and unmanifested waste stored; - for bulk waste (i.e. in a truck or tanker), its weight in kilograms, the first date it was removed from service for disposal, the date it was placed in transport for off-site disposal or storage, and the date of disposal, if known - the serial number, if available, or other means of identifying each PCB article, the weight in kilograms of the PCB waste in each article, the date each article was removed from service for disposal, the date each article was placed in transport for off-site 	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - PCB	Y/N N/A N/R	COMMENTS	FIND #
	<p>(Continuation)</p> <ul style="list-style-type: none"> - storage or disposal, and the date each article was disposed of, if known; - a unique number identifying each PCB container, the description of the contents of each PCB container, the weight in kilograms of the material in each container, the first date material placed in the container was removed from service for disposal, the date it was placed in transport for off-site storage or disposal, if known; - a unique number identifying each PCB article container, a description of the contents of each PCB article container, such as pipes, capacitors, electrical motors, etc., the total weight in kilograms of the material in the PCB article container, the first date a PCB article was removed from service for disposal, and the date the PCB article container was placed in transport for off-site storage or disposal, if known; and - for PCBs placed in storage for disposal or disposed of during the calendar year are the following recorded: <ul style="list-style-type: none"> (1) the total number by specific type of PCB article and the total weight in kilograms of the PCBs in the PCB articles; (2) the total number of PCB articles containers and the weight in kilograms of the contents of the PCB article containers; (3) the total number of PCB container and the total weight in kilograms of the contents of the PCB containers; and (4) the total weight in kilograms of bulk PCB waste; - the total number of PCB transformer and the total weight in kilograms of the PCBs contained in the transformers remaining in service at the end of the calendar year; - the total number of large high and low voltage PCB capacitors remaining in service at the end of the calendar year; - the total weight in kilograms of any PCBs and PCB items in PCB containers, including the identification of container contents, remaining in service at the facility at the end of the calendar year; - the above information for any PCB received from or shipped to another activity; and - a record of each telephone call, other means used to verify the receipt of shipments of PCBs and PCB items to commercial storers and disposers? 			
40 CFR 761.202 (a) - and - OPNAVINST 5090.1B 11-6.5(b)	Does the activity have an EPA identification number for generating or storing PCB waste?	N/A		
40 CFR 761.202 (b)(ii) - and -	Does whoever transports or disposes of PCBs and PCB items for the activity have an EPA identification number?	N/A		

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OPNAVINST 5090.1B 11-6.5(b),(e)	(Continuation)			
40 CFR 761.207 (c),(e),(f)	Is the activity completing the EPA (or state as required) manifest when it ships PCBs and PCB items by commercial transporters? NOTE: The state may require the use of their manifest when PCBs are shipped from, to, or both, a location in their state. In addition some states define PCBs as a hazardous waste and the restrictions for transporting hazardous waste in those states do apply.	N/A		
40 CFR 761.207 (g)	Is the receiving location designated on the manifest, and is the location listed as an EPA approved storer or disposer? NOTE: Unless required by the state shipment of PCBs to DRMO on Navy vehicles do not require a manifest; however, records must kept showing what, when, and where on all PCB shipments.	N/A		
40 CFR 761.208	On PCB manifests, does the activity: - sign the manifest certification by hand; - obtain the handwritten signature of the initial transporter; - retain one copy in its records; - give the remaining copies to the initial transporter; - receive a copy of the manifest from the final receiver (usually the disposer) within 35 days after the initial transporter accepts the PCBs (this copy must have a handwritten signature from the final receiver); - make and record a telephone call (or other prearranged method) to the final receiver confirming that he has received the shipment as manifested; and - if the manifest is not received in 45 days has the activity notified the EPA and is this notification recorded?	N/A		
40 CFR 761.218 (a)	Does the activity receive a Certificate of Disposal for every manifested shipment of the PCBs and PCB items, and do the certificates include all of the following: - the name, address and EPA identification number of the disposer; - the identity of the PCB waste affected by the certificate, including reference to the manifest number that the PCB waste was shipped on; and - a statement certifying the fact of disposal of the identified waste, including the date(s) of the disposal and the disposal process used?	N/A		
40 CFR 761.218 (b)	Are the Certificates of Disposal sent to the activity within 30 days after the disposal of the PCBs was completed?	N/A		

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40 CFR 761.218 (d)(1)	Are the PCB Certificate of Disposal being kept in accordance with 40 CFR 761.180? NOTE: Certificates of Disposal are to be kept for three years with annual document file.	N/A		

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	GENERAL POLICIES AND RESPONSIBILITIES	YES		
OPNAVINST 5090.1B 1-2.1b	Are all Navy personnel (civilian and military), all tenants, and all contractors working for the Navy required to comply with applicable Federal, State, Local, and internal environmental laws, regulations, and policies?			
OPNAVINST 5090.1B 1-4.3.1c	When assessed a charge by a regulatory agency for a service, does the activity: - consult with legal counsel to ensure that the charge is a "fee" and not a "tax", and is lawful and in accordance with Navy policy; - make clear to the authority demanding payment, if the activity is questioning a charge, that the delay for review is not a reflection of Navy resistance to regulatory action, but is necessary because of legal issues that must be resolved before payment may lawfully be made; and - immediately reported to OP-45 and the Comptroller of the Navy should any regulatory agency refuse to issue or maintain a permit needed for lawful operation pending the Navy's legal review of the charge?	YES		
OPNAVINST 5090.1B 1-2.9	Immediately upon receipt of any written or oral NOV, NON, Warning Letters/Notices, citizens suit, Consent Orders, or any other formal notice of deficiency of federal, state, or interstate, or local environmental control laws, does the Commanding Officer report the non-compliance in accordance with the procedures set forth in OPNAVINST 5090.1B, Appendix C?	YES		
- and - OPNAVINST 5090.1B 1-4.3.2 - and - OPNAVINST 5090.1B Appendix B				
OPNAVINST 5090.1B 1-2.9 - and - OPNAVINST 5090.1B Appendix B	When necessary, does the activity seek additional technical and legal support from the major claimant and/or cognizant EFD upon receipt of any oral, informal, or formal notice on non-compliance?	YES		
OPNAVINST 5090.1B 1-2.10	Have authorized EPA or state/local environmental regulatory officials been allowed to enter onto the shore facility at reasonable times to conduct inspections and perform other regulatory duties?	YES		
OPNAVINST 5090.1B 1-2.8	Does the activity support the participation of its employees and officers in regional and community programs to prevent pollution; protect the environment; conserve natural, historic, and cultural resources; and address waste management issues?	YES		
OPNAVINST 5090.1B 1-3.6 -and- OPNAVINST 5090.1B	As appropriate, has the activity submitted nominations for the CNO/Marine Corps Environmental Quality and Natural Resources Conservation Awards?	N/R	Non-operational.	

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REGULATORY CITATION	AUDITOR'S CHECKLIST - POLICY	Y/N N/A N/R	COMMENTS	FIND #
Appendix D	(Continuation)			
OPNAVINST 5090.1B 1-5.16d	Does the activity coordinate all important environmental and natural resources matters, especially violations, agreements, permit conditions, and demands for payment of fees, with the EFD, major claimant, state and regional environmental coordinators?	YES		
OPNAVINST 5090.1B 1-4.6.1	Has the activity identified and budgeted sufficient resources to ensure environmental compliance requirements are integrated into all levels of activity management?	YES		
OPNAVINST 5090.1B 1-5.16g	Regarding environmental permits: - When applicable, has the Commanding Officer of the host command delegated authority to sign and hold permits of tenant commands; - are permit conditions coordinated with the affected tenant commands; and - if a tenant command holds a permit, are the permit conditions coordinated with the host command?	YES	Tenants hold their own permits. CSO maintains permits required for CSO operations only.	
OPNAVINST 5090.1B 1-2.14	MANAGEMENT AND ORGANIZATION Are host/tenant agreements in place which define roles and responsibilities which exist with respect to environmental compliance; and do these agreements include provisions for: - ECEs; - NEPA documentation; - contact with regulatory agencies; - payment of fines/fees; - permit signatures/responsibilities; - HW management; - environmental/OSHA training; and - corrective actions and emergency response actions?	YES	Lease agreement includes environmental clause.	
OPNAVINST 5090.1B 1-2.14 -and- OPNAVINST 5090.1B 1-5.16g -and- OPNAVINST 5090.1B 2-16.13b	Does the Commanding Officer certify and sign all environmental permits?	N/R	See above.	
OPNAVINST 5090.1B 1-2.12	Does the activity immediately advise the major claimant of any proposal or requirement with the potential to adversely affect the activity mission, with information copies to the chain of command, the cognizant EFD, and the regional environmental coordinator?	YES		
OPNAVINST 5090.1B 1-2.14	If appropriate, has an Environmental Compliance Board or similar management and oversight committee been established (which includes representatives of tenant commands) to coordinate environmental compliance issues?	N/R	Non-operational. Enforced via Cooperative Agreement and periodic site visits.	

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	(Continuation)			
	FUNDING			
OPNAVINST 5090.1B 1-5.16i	Have all routine, recurring environmental compliance costs (including staffing, training, and NEPA documentation costs) been planned, programmed, and budgeted via the appropriate claimant?	YES		
OPNAVINST 5090.1B 1-5.16h	Has the activity ensured all non-routine, nonrecurring environmental compliance requirements, including those funded by activity funds are forwarded in the form of a PCR exhibit to the appropriate Major Claimant for inclusion on the OMB A-106?	N/R		
	ENVIRONMENTAL COMPLIANCE EVALUATIONS			
OPNAVINST 5090.1B 20-5.3 - and - OPNAVINST 5090.1B 20-6.4a	Has the activity performed an annual self-ECE? NOTE: The host activity self-ECEs must include tenant activities, even if a tenant has been exempted from conducting an ECE.	N/R	Activity entered closure status in April of 1996 and transferred to FAC Claimancy April 1. CSO should schedule its first self-ECE during the month of April 1997 and follow-up self-ECE's each year thereafter (while CSO is still active).	
OPNAVINST 5090.1B 20-6.4a	Was the Self-ECE report forwarded to the Commanding Officer and has this report been provided to major claimant IG teams?	N/R		
OPNAVINST 5090.1B 20-6.4b	Based on ECEs, Federal and State regulatory agency inspection, and other information, have plans of action for achieving compliance been developed and executed?	N/R		
OPNAVINST 5090.1B 20-6.4d	Is environmental compliance a factor in the performance evaluations of appropriate personnel?	YES		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - PW	Y/N N/A N/R	COMMENTS	FIND #
INTRODUCTORY COMMENT	<p>The following questions pertain to both community and non-transient non-community public water systems unless specifically noted. A few questions pertain to transient non-community systems. Questions applicable to transient non-community system will be noted by saying "applies to all water systems" or by specifically noting transient non-community systems. Transient non-community water systems would exist primarily at reserve centers or outlying fields.</p> <p>NOTE: A public water system means a system for the provision to the public of piped water for human consumption, if such system has at least 15 service connections OR regularly serves an average of at least 25 individuals daily at least 60 days out of the year. Such term includes (1) any collection, treatment, storage, and distribution facilities under control of the operator of such system and used primarily in connection with such system, and (2) any collection or pretreatment storage facilities not under such control which are used primarily in connection with such system. A public water system is either a "community water system" OR a "non-community water system".</p> <p>A "community water system" means a public water system which serves at least 15 service connections used by year-round residents OR regularly serves at least 25 year-round residents.</p> <p>A "non-community water system" means a public water system that serves less than 15 service connections used by year-round residents AND regularly serves less than 25 year-round residents. A "non-community water system" can either be classified as "non-transient" OR "transient".</p> <p>A "non-transient non-community water system" means a non-community water system that regularly serves at least 25 of the same persons over 6 months per year.</p> <p>A "transient non-community water system" means a non-community water system that does not regularly serve at least 25 of the same persons over 6 months per year.</p>	N/A	Charleston NSY/FISC/NS receives its water from Commissioners of Public Works and is classified as a community water system.	
40 CFR 141.4 - and - 40 CFR 141.3 - and - 40 CFR 141.29	<p style="text-align: center;">GENERAL</p> <p>If the water system does not perform normal sampling and analytical requirements as specified in this checklist, has an exemption or variance been obtained from the regulatory agency based on satisfying conditions stated in 40 CFR 141.4, 141.3, or 141.29?</p> <p>NOTE: Any exemption or variance should be obtained in writing from the regulatory agency.</p> <p>40 CFR 141.4 allows the primary enforcement authority to issue variances or exemptions from certain provisions of 40 CFR 141 pursuant to sections 1415 and 1416 of the Safe Drinking Water</p>	YES	Charleston NSY/FISC/NS received an exemption from DHEC in February 1993 for performing sampling and analytical requirements of 40 CFR 141.	

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40 CFR 141.5	<p>(Continuation)</p> <p>Act, except that variances or exemptions may not be granted from the MCL for total coliforms or from any treatment techniques requirements of 40 CFR 141 Subpart H.</p> <p>40 CFR 141.3 allows the public water system to be totally exempted from 40 CFR 141 if all four of the conditions stated below are satisfied.</p> <p>40 CFR 141.29 allows the primary enforcement authority to modify monitoring requirements for the public water system if the second condition stated below is satisfied.</p> <p>The four conditions are that the public water system:</p> <ol style="list-style-type: none"> (1) consists only of distribution and storage facilities (and does not have any collection and treatment facilities) (2) obtains all of its water from, but is not owned by, a public water system to which such regulations apply (3) does not sell water to any person, and (4) is not a carrier which conveys passengers in interstate commerce. <p>Regarding condition (3), there is no definition for the "selling of water" in 40 CFR 141. Initially, it was believed that "selling of water" would pertain to any reimbursement for water supplied to a non-Government entity located off Government property. This interpretation would exclude private businesses such as McDonald's, credit unions, contractors (e.g. construction, BOS), etc. which are located on Government property under contractual agreement and provides direct service and benefit to the Government.</p> <p>However, COMNAVFACEGCOM guidance says that if the "transfer of water" is identified as a specific item in a contractual agreement between the Navy and any user of the Navy's public water system, then the cost of reimbursement of water is reflected in the overall contract price and "selling" has occurred. If the "transfer of water" is not identified as a specific item in the contractual agreement, then the water is transferred free of charge and "selling" has not occurred.</p> <p>Obviously, contractual agreements can be a "gray" area and it is doubtful that the ECE evaluator will have access to or time to review them for answering this question. Each evaluator must use his/her best judgement in responding to this question and in making comments/recommendations regarding exemptions or variances.</p> <p>Is the State notified before initiating construction of a new public water system or increasing the capacity of an existing water system?</p>	N/A		

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40 CFR 141.28	<p>Is all analytical work performed by a State certified laboratory?</p> <p>NOTE: Turbidity, free chlorine residual, temperature, and pH may be performed by any person acceptable to the State.</p>	N/A		
40 CFR 141.31 (a)	<p>Except where a shorter period is specified, are results of analyses reported to the State monthly within:</p> <ul style="list-style-type: none"> - the first 10 days following the month in which the result is received, or - the first 10 days following the end of the monitoring period as stipulated by the State, whichever of these is the earliest? 	N/A		
40 CFR 141.31 (b)	<p>Unless specified otherwise, does the water system report to the State within 48 hours concerning the failure to comply with any national primary drinking water regulation applicable to the water system?</p>	N/A		
40 CFR 141.31 (d)	<p>Does the water system, within 10 days of completion of any public notification issued pursuant to 40 CFR 141.32, submit to the State a copy of the notice distributed, published, posted, and/or made available to the public and/or to the media?</p>	N/A		
40 CFR 141.32	<p>Unless specified otherwise, does the water system issue public notifications (regarding violations of maximum contaminant levels (MCLs), treatment techniques, and variance and exemption schedules) complying with requirements for method of issuing notice, timing, content of notice, mandatory health effects language, etc.?</p>	N/A		
40 CFR 141.33 (a)	<p>Do sampling records contain information specified in the citation?</p> <p>NOTE: Sampling records must contain the following information:</p> <ul style="list-style-type: none"> - sampling date, time, and location - name of person collecting sample - identification of the sample (i.e. routine distribution system sample, check sample, raw or process water sample or other special purpose sample) - date of analysis - laboratory and person responsible for performing analysis - analytical technique/method used, and - results of analysis 	N/A		
40 CFR 141.33 (a)	<p>Are records of bacteriological analyses kept for a minimum of 5 years and records of chemical analyses kept for a minimum of 10 years?</p>	N/A		
40 CFR 141.33 (b)	<p>Are records of action to correct violations maintained for a minimum of 3 years after the last corrective action?</p>	N/A		
40 CFR 141.33 (c)	<p>Are written reports, summaries, or communications on sanitary surveys of the system maintained for a</p>	N/A		

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40 CFR 141.33 (d)	(Continuation) minimum of 10 years? Are records of granted variances or exemptions maintained for a minimum of 5 years after the expiration date?	N/A		
OPNAVINST 5090.1B 8-5.2 - and - State Regs	Do water system operators satisfy certification requirements of the state in which the system is located?	N/A		
OPNAVINST 5090.1B 8-5.10	If the activity owns and operates a Navy public water system, has an operation and maintenance (O&M) program been documented and implemented? NOTE: The O&M program should, at a minimum, include the following: - emergency and preventive maintenance procedures - system disinfection after performed maintenance - scheduled flushing of the system - needed actions to reduce water quality problems - valve exercise and maintenance program	N/A		
State Regs	PERMITS If a consumptive use and/or operating permit is required for the water system, has the appropriate application been completed and filed in the required time frame?	N/A		
40 CFR 144 through 40 CFR 148	If the activity utilizes underground injection wells for disposal of wastewater effluent, hazardous pollutants, etc., are administrative requirements of 40 CFR 144 - 148 for obtaining an underground injection permit being satisfied? NOTE: As defined in 40 CFR 144.3, well injection means the subsurface emplacement of fluids through a bored, drilled or driven well or through a dug well where the depth of the well is greater than the largest surface dimension. If underground injection is practiced, an Underground Injection Program must have been filed with the regulatory agency. The agency would then issue a permit for underground injection. All administrative requirements are discussed in the referenced regulatory citation.	N/A		
40 CFR 144 through 40 CFR 148 - and - State Regs	It is anticipated that underground injection is seldom performed, therefore, the answer to this question will most likely be "N/A". If the activity has been issued an underground injection permit by the State, are conditions of the permit being satisfied? NOTE: For further information on underground injection, see the section entitled "UNDERGROUND INJECTION CONTROL" later in this checklist.	N/A		

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State Regs	<p>(Continuation)</p> <p>Are permit requirements being satisfied?</p> <p>NOTE: There will be varying requirements specified in the permit such that it is not feasible to include individual checklist questions for each requirement. The ECE evaluator must review all permits and specify any individual requirements which are not being satisfied. DO NOT DUPLICATE DEFICIENCIES if a permit requirement which is in non-compliance is identified under other sections of this checklist.</p>	N/A																																				
<p>40 CFR 141.11 (a) and (b) - and - 40 CFR 141.62 (b)</p>	<p style="text-align: center;">INORGANICS</p> <p>Does the water system comply with MCLs for inorganics, as applicable?</p> <p>NOTE: Applicability of inorganics to water systems is as follows:</p> <p>Community systems: all parameters Non-transient non-community systems: 40 CFR 141.62(b)(2)-(13) and (15) Transient non-community systems: 40 CFR 141.62(b)(7)-(9)</p> <p>The inorganic contaminants and their MCLs are as follows:</p> <table border="0" style="width: 100%;"> <thead> <tr> <th style="text-align: left;">CONTAMINANT</th> <th style="text-align: left;">MCL (mg/l)</th> </tr> </thead> <tbody> <tr> <td>40 CFR 141.11 (b) Arsenic</td> <td>0.05</td> </tr> <tr> <td>40 CFR 141.62 (b)(1) Fluoride</td> <td>4</td> </tr> <tr> <td>(b)(2) Asbestos</td> <td>7 million fibers/liter (longer than 10 micrometers)</td> </tr> <tr> <td>(b)(3) Barium</td> <td>2</td> </tr> <tr> <td>(b)(4) Cadmium</td> <td>0.005</td> </tr> <tr> <td>(b)(5) Chromium</td> <td>0.1</td> </tr> <tr> <td>(b)(6) Mercury</td> <td>0.002</td> </tr> <tr> <td>(b)(7) Nitrate</td> <td>10 (as Nitrogen)</td> </tr> <tr> <td>(b)(8) Nitrite</td> <td>1 (as Nitrogen)</td> </tr> <tr> <td>(b)(9) Total Nitrite and Nitrate</td> <td>10 (as Nitrogen)</td> </tr> <tr> <td>(b)(10) Selenium</td> <td>0.05</td> </tr> <tr> <td>(b)(11) Antimony</td> <td>0.006</td> </tr> <tr> <td>(b)(12) Beryllium</td> <td>0.004</td> </tr> <tr> <td>(b)(13) Cyanide (as free cyanide)</td> <td>0.2</td> </tr> <tr> <td>(b)(14) [Reserved]</td> <td></td> </tr> <tr> <td>(b)(15) Thallium</td> <td>0.002</td> </tr> </tbody> </table>	CONTAMINANT	MCL (mg/l)	40 CFR 141.11 (b) Arsenic	0.05	40 CFR 141.62 (b)(1) Fluoride	4	(b)(2) Asbestos	7 million fibers/liter (longer than 10 micrometers)	(b)(3) Barium	2	(b)(4) Cadmium	0.005	(b)(5) Chromium	0.1	(b)(6) Mercury	0.002	(b)(7) Nitrate	10 (as Nitrogen)	(b)(8) Nitrite	1 (as Nitrogen)	(b)(9) Total Nitrite and Nitrate	10 (as Nitrogen)	(b)(10) Selenium	0.05	(b)(11) Antimony	0.006	(b)(12) Beryllium	0.004	(b)(13) Cyanide (as free cyanide)	0.2	(b)(14) [Reserved]		(b)(15) Thallium	0.002	N/A		
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40 CFR 141.23 (a)	Are samples collected for inorganics beginning in the compliance period starting January 1, 1993 and at locations specified in this regulatory citation?	N/A																																				
40 CFR 141.23 (b)(1)	Does the public water system (excluding transient non-community) monitor for asbestos during the first three year compliance period of each nine	N/A																																				

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	<p>(Continuation) year compliance cycle beginning in the compliance period starting January 1, 1993?</p> <p>NOTE: If monitoring data collected after January 1, 1990 for asbestos is consistent with requirements of the citation, the State may allow use of that data to satisfy the monitoring for the initial compliance period.</p> <p>Monitoring for asbestos is not required if the water system obtains a waiver from the State as discussed in 40 CFR 141.23 (b)(2)-(4).</p>			
40 CFR 141.23 (b)(5); (b)(7)	If a water system is vulnerable to contamination due to corrosion of asbestos cement pipe, is one sample taken at a tap served by asbestos cement pipe and under conditions where asbestos contamination is most likely to occur?	N/A		
40 CFR 141.23 (b)(8)	If the MCL for asbestos is exceeded, is monitoring performed quarterly beginning the quarter after the violation occurred?	N/A		
40 CFR 141.11 (a) - and - 40 CFR 141.23 (l)(1)-(2); (c)(1)	For inorganic contaminants listed in 40 CFR 141.11(b) and 141.62(b)(1), (3)-(6), and (10)-(15), is one sample collected at each sampling point once every 3 years for a groundwater system OR one sample collected annually at each sampling point for surface water systems? NOTE: This citation excludes transient non-community water systems. 40 CFR 141.11(b) only applies to community water systems.	N/A		
40 CFR 141.23 (c)(2)-(6)	If a waiver from monitoring requirements of 40 CFR 141.23(c)(1) has been obtained, are requirements of the waiver being satisfied?	N/A		
40 CFR 141.23 (c)(7)	If a water system exceeds the MCL for any of the contaminants referenced in 40 CFR 141.23(c)(1), is monitoring performed quarterly beginning in the next quarter after the violation occurred?	N/A		
40 CFR 141.23 (d)(1)-(5)	For nitrate, does the water system monitor annually beginning January 1, 1993 if served by ground water or quarterly beginning January 1, 1993 if served by surface water (only applies to community and non-transient non-community water systems) OR monitor annually beginning January 1, 1993 if a transient non-community water system served by ground water or surface water; and is repeat monitoring performed as necessary?	N/A		
40 CFR 141.11 (d)	If at the discretion of the State, nitrate levels not to exceed 20 mg/l are allowed, does the water system demonstrate to the satisfaction of the State that: - such water will not be available to children under 6 months old, - there will be continuous posting of excessive	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - PW	Y/N N/A N/R	COMMENTS	FIND #
	(Continuation) nitrate levels and potential health effects, - local and State public health officials will be notified annually of nitrate levels that exceed 10 mg/l, - no adverse health effects shall result?			
40 CFR 141.23 (e)(1)-(4)	For nitrite, does the water system monitor once at each sampling point in the compliance period beginning January 1, 1993 and ending December 31, 1995; and is repeat monitoring performed as necessary? NOTE: Applies to all public water systems.	N/A		
40 CFR 141.23 (f)(1)-(3)	When the results of analyses indicate exceedance of any MCL for inorganics listed in 40 CFR 141.62(b) as determined based on requirements of 40 CFR 141.23(i), are confirmation samples collected in accordance with 40 CFR 141.23(f)?	N/A		
40 CFR 141.23 (m)	If any analysis for arsenic exceeds the MCL, does the water system report to the State within 7 days and initiate 3 additional analyses at the same sampling point within 1 month? NOTE: Arsenic only applies to community water systems.	N/A		
40 CFR 141.23 (n)	When the average of the original and 3 repeat samples exceeds the MCL for arsenic, does the water system notify the State pursuant to 40 CFR 141.31 and give notice to the public pursuant to 40 CFR 141.32; and is follow-up monitoring conducted at a frequency specified by the State and continued until the MCL has not been exceeded in 2 successive samples, or until a specified monitoring schedule becomes effective?	N/A		
40 CFR 141.40 (n)(12)	Did the water system complete monitoring (in accordance with 40 CFR 141.40(n)(1)-(10)) for sulfate by December 31, 1995, unless granted a waiver by the State under 40 CFR 141.40(n)(4)?	N/A		
	ORGANICS	N/A		
40 CFR 141.12 - and - 40 CFR 141.61 (a) and (c)	Does the water system comply with MCLs for applicable organic contaminants? NOTE: Per 40 CFR 141.60, the effective dates for complying with MCLs for organic and synthetic organic contaminants listed under 40 CFR 141.61(a) and (c) are as follows: (a)(1) - (a)(8).....January 9, 1989 (a)(9) - (a)(18).....July 30, 1992 (a)(19) - (a)(21).....January 17, 1994 (c)(1) - (c)(18).....July 30, 1992 (c)(19) - (c)(25).....January 17, 1994 (c)(26).....August 17, 1992 (c)(27) - (c)(33).....January 17, 1994 Total trihalomethanes under 40 CFR 141.12(c) only			

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	<p>(Continuation) apply to community water systems which serve 10,000 or more individuals and add a disinfectant to the water.</p> <p>Organic contaminants listed under 141.61(a) and synthetic organic contaminants listed under 141.61(c) apply to both community and non-transient non-community water systems.)</p> <p>Organic contaminants and their MCLs are as follows:</p> <table border="0"> <thead> <tr> <th>CONTAMINANTS</th> <th>MCL(mg/l)</th> </tr> </thead> <tbody> <tr> <td>40 CFR 141.12</td> <td></td> </tr> <tr> <td>(a) [Reserved]</td> <td></td> </tr> <tr> <td>(b) [Reserved]</td> <td></td> </tr> <tr> <td>(c) Total trihalomethanes</td> <td>0.10</td> </tr> <tr> <td>40 CFR 141.61</td> <td></td> </tr> <tr> <td>(a)(1) Vinyl chloride</td> <td>0.002</td> </tr> <tr> <td>(a)(2) Benzene</td> <td>0.005</td> </tr> <tr> <td>(a)(3) Carbon tetrachloride</td> <td>0.005</td> </tr> <tr> <td>(a)(4) 1,2-Dichloroethane</td> <td>0.005</td> </tr> <tr> <td>(a)(5) Trichloroethylene</td> <td>0.005</td> </tr> <tr> <td>(a)(6) para-Dichlorobenzene</td> <td>0.075</td> </tr> <tr> <td>(a)(7) 1,1-Dichloroethylene</td> <td>0.007</td> </tr> <tr> <td>(a)(8) 1,1,1-Trichloroethane</td> <td>0.2</td> </tr> <tr> <td>(a)(9) cis-1,2-dichloroethylene</td> <td>0.07</td> </tr> <tr> <td>(a)(10) 1,2-Dichloropropane</td> <td>0.005</td> </tr> <tr> <td>(a)(11) Ethylbenzene</td> <td>0.7</td> </tr> <tr> <td>(a)(12) Monochlorobenzene</td> <td>0.1</td> </tr> <tr> <td>(a)(13) o-Dichlorobenzene</td> <td>0.6</td> </tr> <tr> <td>(a)(14) Styrene</td> <td>0.1</td> </tr> <tr> <td>(a)(15) Tetrachloroethylene</td> <td>0.005</td> </tr> <tr> <td>(a)(16) Toluene</td> <td>1</td> </tr> <tr> <td>(a)(17) trans-1,2-Dichloroethylene</td> <td>0.1</td> </tr> <tr> <td>(a)(18) Xylenes (total)</td> <td>10</td> </tr> <tr> <td>(a)(19) Dichloromethane</td> <td>0.005</td> </tr> <tr> <td>(a)(20) 1,2,4-Trichlorobenzene</td> <td>0.07</td> </tr> <tr> <td>(a)(21) 1,1,2-Trichloroethane</td> <td>0.005</td> </tr> <tr> <td>(c)(1) Alachlor</td> <td>0.002</td> </tr> <tr> <td>(c)(2) Aldicarb</td> <td>0.003</td> </tr> <tr> <td>(c)(3) Aldicarb sulfoxide</td> <td>0.004</td> </tr> <tr> <td>(c)(4) Aldicarb sulfone</td> <td>0.002</td> </tr> <tr> <td>(c)(5) Atrazine</td> <td>0.003</td> </tr> <tr> <td>(c)(6) Carbofuran</td> <td>0.04</td> </tr> <tr> <td>(c)(7) Chlordane</td> <td>0.002</td> </tr> <tr> <td>(c)(8) Dibromochloropropane</td> <td>0.0002</td> </tr> <tr> <td>(c)(9) 2,4-D</td> <td>0.07</td> </tr> <tr> <td>(c)(10) Ethylene dibromide</td> <td>0.00005</td> </tr> <tr> <td>(c)(11) Heptachlor</td> <td>0.0004</td> </tr> <tr> <td>(c)(12) Heptachlor epoxide</td> <td>0.0002</td> </tr> <tr> <td>(c)(13) Lindane</td> <td>0.0002</td> </tr> <tr> <td>(c)(14) Methoxychlor</td> <td>0.04</td> </tr> <tr> <td>(c)(15) Polychlorinated biphenyls</td> <td>0.0005</td> </tr> <tr> <td>(c)(16) Pentachlorophenol</td> <td>0.001</td> </tr> <tr> <td>(c)(17) Toxaphene</td> <td>0.003</td> </tr> <tr> <td>(c)(18) 2,4,5-TP</td> <td>0.05</td> </tr> <tr> <td>(c)(19) Benzo[a]pyrene</td> <td>0.0002</td> </tr> <tr> <td>(c)(20) Dalapon</td> <td>0.2</td> </tr> <tr> <td>(c)(21) Di(2-ethylhexyl) adipate</td> <td>0.4</td> </tr> <tr> <td>(c)(22) Di(2-ethylhexyl) phthalate</td> <td>0.006</td> </tr> <tr> <td>(c)(23) Dinoseb</td> <td>0.007</td> </tr> </tbody> </table>	CONTAMINANTS	MCL(mg/l)	40 CFR 141.12		(a) [Reserved]		(b) [Reserved]		(c) Total trihalomethanes	0.10	40 CFR 141.61		(a)(1) Vinyl chloride	0.002	(a)(2) Benzene	0.005	(a)(3) Carbon tetrachloride	0.005	(a)(4) 1,2-Dichloroethane	0.005	(a)(5) Trichloroethylene	0.005	(a)(6) para-Dichlorobenzene	0.075	(a)(7) 1,1-Dichloroethylene	0.007	(a)(8) 1,1,1-Trichloroethane	0.2	(a)(9) cis-1,2-dichloroethylene	0.07	(a)(10) 1,2-Dichloropropane	0.005	(a)(11) Ethylbenzene	0.7	(a)(12) Monochlorobenzene	0.1	(a)(13) o-Dichlorobenzene	0.6	(a)(14) Styrene	0.1	(a)(15) Tetrachloroethylene	0.005	(a)(16) Toluene	1	(a)(17) trans-1,2-Dichloroethylene	0.1	(a)(18) Xylenes (total)	10	(a)(19) Dichloromethane	0.005	(a)(20) 1,2,4-Trichlorobenzene	0.07	(a)(21) 1,1,2-Trichloroethane	0.005	(c)(1) Alachlor	0.002	(c)(2) Aldicarb	0.003	(c)(3) Aldicarb sulfoxide	0.004	(c)(4) Aldicarb sulfone	0.002	(c)(5) Atrazine	0.003	(c)(6) Carbofuran	0.04	(c)(7) Chlordane	0.002	(c)(8) Dibromochloropropane	0.0002	(c)(9) 2,4-D	0.07	(c)(10) Ethylene dibromide	0.00005	(c)(11) Heptachlor	0.0004	(c)(12) Heptachlor epoxide	0.0002	(c)(13) Lindane	0.0002	(c)(14) Methoxychlor	0.04	(c)(15) Polychlorinated biphenyls	0.0005	(c)(16) Pentachlorophenol	0.001	(c)(17) Toxaphene	0.003	(c)(18) 2,4,5-TP	0.05	(c)(19) Benzo[a]pyrene	0.0002	(c)(20) Dalapon	0.2	(c)(21) Di(2-ethylhexyl) adipate	0.4	(c)(22) Di(2-ethylhexyl) phthalate	0.006	(c)(23) Dinoseb	0.007			
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	<p>(Continuation)</p> <p>(c)(24) Diquat 0.02</p> <p>(c)(25) Endothall 0.1</p> <p>(c)(26) Endrin 0.002</p> <p>(c)(27) Glyphosate 0.7</p> <p>(c)(28) Hexachlorobenzene 0.001</p> <p>(c)(29) Hexachlorocyclopentadiene 0.05</p> <p>(c)(30) Oxamyl (Vydate) 0.2</p> <p>(c)(31) Picloram 0.5</p> <p>(c)(32) Simazine 0.004</p> <p>(c)(33) 2,3,7,8-TCDD (Dioxin) 0.00000003</p>			
40 CFR 141.24 (e)-(f), (h) - and - 40 CFR 141.30 (a)-(g)	<p>Does the water system analyze for organic contaminants in the frequency and manner specified in the following citations?</p> <p>40 CFR 141.30(a)-(g): total trihalomethanes</p> <p>40 CFR 141.24(e)-(f): contaminants listed under 40 CFR 141.61(a)(1)-(21)</p> <p>40 CFR 141.24(h): contaminants listed under 40 CFR 141.61(c)</p> <p>NOTE: Monitoring/analysis procedures covered under 40 CFR 141.24 (e)-(f) and (h) became effective in the monitoring period beginning January 1, 1993. The timeframe for monitoring in the initial compliance period is to be established by the State.</p>	N/A		
40 CFR 141.40 (a)-(e)	<p>Has the water system sampled (according to specified frequencies) for the 20 unregulated organic contaminants listed below at entry points to the distribution system representative of each well or water source after any application of treatment?</p> <p>NOTE: The following monitoring pertains only to community and non-transient non-community water systems. Frequencies of monitoring depend on whether the water systems use ground water or surface water. Also note that (e)(7) is missing in the list below. This is due to a numbering error in the regulations which hopefully will be corrected by EPA on a future update.</p> <p>Unregulated organics for special monitoring under 40 CFR 141.40(e) include:</p> <p>CONTAMINANT</p> <p>(e)(1) Chloroform</p> <p>(e)(2) Bromodichloromethane</p> <p>(e)(3) Chlorodibromomethane</p> <p>(e)(4) Bromoform</p> <p>(e)(5) Dibromomethane</p> <p>(e)(6) m-Dichlorobenzene</p> <p>(e)(8) 1,1-Dichloropropene</p> <p>(e)(9) 1,1-Dichloroethane</p> <p>(e)(10) 1,1,1,2-Tetrachloroethane</p> <p>(e)(11) 1,3-Dichloropropane</p> <p>(e)(12) Chloromethane</p> <p>(e)(13) Bromomethane</p> <p>(e)(14) 1,2,3-Trichloropropane</p> <p>(e)(15) 1,1,1,2-Tetrachloroethane</p> <p>(e)(16) Chloroethane</p>	N/A		

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40 CFR 141.40 (j)	<p>(Continuation)</p> <p>(e)(17) 2,2-Dichloropropane (e)(18) o-Chlorotoluene (e)(19) p-Chlorotoluene (e)(20) Bromobenzene (e)(21) 1,3-Dichloropropene</p> <p>Has monitoring for additional fourteen (14) unregulated organic compounds been accomplished if requested by the State?</p> <p>NOTE: The additional unregulated organic compounds which the State can request be monitored include:</p> <p>(j)(1) 1,2,4-Trimethylbenzene (j)(2) 1,2,3-Trichlorobenzene (j)(3) n-Propylbenzene (j)(4) n-Butylbenzene (j)(5) Naphthalene (j)(6) Hexachlorobutadiene (j)(7) 1,3,5-Trimethylbenzene (j)(8) p-Isopropyltoluene (j)(9) Isopropylbenzene (j)(10) Tert-butylbenzene (j)(11) Sec-butylbenzene (j)(12) Fluorotrichloromethane (j)(13) Dichlorodifluoromethane (j)(14) Bromochloromethane</p>	N/A		
40 CFR 141.40 (l)	<p>Has monitoring for contaminants listed under 40 CFR 141.40(a) been repeated no less frequently than every 5 years from the dates specified below based on number of people served?</p> <ul style="list-style-type: none"> - Greater than 10,000 people: January 1, 1988 - 3,300 to 10,000 people: January 1, 1989 - Less than 3,300 people: January 1, 1991 <p>NOTE: For ECEs accomplished prior to January 1996 for water systems serving less than 3,300 people, the answer to this question could be "N/A" since the 5 year timeframe would not have elapsed.</p>	N/A		
40 CFR 141.40 (n)(11)	<p>Did the water system complete monitoring (in accordance with 40 CFR 141.40(n)(1)-(10)) for the unregulated organic contaminants listed below by December 31, 1995, unless granted a waiver by the State under 40 CFR 141.40(n)(4)?</p> <p>NOTE: The list of unregulated organic contaminants listed under 40 CFR 141.40(n)(11) includes:</p> <p>Aldicarb Aldicarb sulfone Aldicarb sulfoxide Aldrin Butachlor Carbaryl Dicamba Dieldrin 3-Hydroxycarbofuran Methomyl</p>	N/A		

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	<p>(Continuation) Metolachlor Metribuzin Propachlor</p> <p style="text-align: center;">TURBIDITY</p>			
<p>40 CFR 141.13 - and - 40 CFR 141.22</p>	<p>Does the water system using water in whole or in part from surface sources satisfy turbidity monitoring and reporting requirements?</p> <p>NOTE: Requirements for turbidity monitoring and reporting now apply only to unfiltered systems which (1) the State determined in writing prior to December 30, 1991 must install filtration, and (2) has not yet installed the required filtration. Since only in rare instances would turbidity requirements apply, the checklist question will most likely be answered "N/A".</p> <p>No additional questions regarding turbidity are included in this checklist. If turbidity does apply and "NO" is the response to the checklist question, the evaluator will need to review the applicable citations and provide details of deficiencies under the "COMMENTS" column of the checklist.</p>	<p>N/A</p>		
<p>40 CFR 141.21 (a)(1)</p>	<p style="text-align: center;">MICROBIOLOGICAL</p> <p>Does the water system have a written sample siting plan for total coliform sampling?</p>	<p>YES</p>	<p>See General Recommendation 001</p>	
<p>40 CFR 141.63 (a) and (b)</p>	<p>Is the water system in compliance with the MCL for total coliforms?</p> <p>NOTE: Regarding total coliforms, for a system which collects at least 40 samples per month, no more than 5% of the samples can be total coliform positive. If a system collects fewer than 40 samples per month, no more than 1 sample per month can be total coliform positive. Any fecal coliform positive repeat sample or E. coli positive repeat sample, or any total coliform repeat sample following a fecal coliform or E. coli positive routine sample constitutes a violation of the MCL for total coliform.</p>	<p>YES</p>		
<p>40 CFR 141.21 (a)(2)</p>	<p>Are total coliform samples taken according to the specified frequency based on the population served?</p> <p>NOTE: Applies only to community water systems.</p>	<p>NO</p>	<p>40 CFR 141.21(a)(2) requires that total coliform samples be collected based on the population served by the potable water distribution system. Total coliform sampling has not been performed at Charleston NSY/FISC/NS since February 1996. The existing sample siting plan indicates one sample per month had been taken until February 1996. Presently the population has increased to an estimated 2,000, which requires a minimum of two samples to be collected.</p>	<p>PW 001</p>
<p>40 CFR 141.21 (a)(3)</p>	<p>Does a non-community water system covered by this citation comply with applicable monitoring requirements?</p>	<p>N/A</p>		

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	<p>(Continuation)</p> <p>NOTE: A non-community water system which uses only groundwater which is not directly influenced by surface water must satisfy the following for total coliform monitoring:</p> <ul style="list-style-type: none"> - If it serves 1,000 or fewer individuals, the water system must monitor for total coliform each calendar quarter during which water is provided to the public. This may be reduced by the State. - If it serves more than 1,000 individuals, the water system must monitor at the same frequency as a like-sized community water system. <p>A non-community water system which uses groundwater under the direct influence of surface water or uses surface water, regardless of the number of individuals served, must monitor at the same frequency as a like-sized community water system.</p>			
40 CFR 141.21 (b)(1)-(3)	If a routine sample is total coliform-positive, are no fewer than 3 repeat samples collected at specified locations within 24 hours of being notified of positive result (applies to a system which collects more than 1 routine sample per month)?	N/A		
40 CFR 141.21 (b)(4)	If any repeat sample(s) is/are total coliform positive, are additional repeat samples collected in accordance with 40 CFR 141.21(b)(1)-(3) within 24 hours of notification of the positive result?	N/A		
40 CFR 141.21 (b)(5)	If the water system collects fewer than 5 routine samples per month and has 1 or more total coliform positive samples, are at least 5 routine samples collected during the next month (unless waived under 40 CFR 141.21(b)(5)(i) or (ii))?	N/A		
40 CFR 141.21 (e)(1)	If any routine or repeat sample is total coliform positive, is the total coliform culture medium analyzed to determine if fecal coliforms or E. coli are present?	N/A		
40 CFR 141.21 (e)(1)	If fecal coliforms or E. coli are present in routine or repeat samples, is the State notified by the end of the day on which the water system is notified of the test result?	N/A		
40 CFR 141.21 (d)	If the water system collects less than 5 routine total coliform samples per month, was an initial sanitary survey of the system conducted by June 29, 1994 (for a community water system) or will one be conducted by June 29, 1999 (for a non-community water system)?	N/A		
	NOTE: The sanitary survey must be performed by the State or an agent approved by the State.			
40 CFR 141.21 (g)(1)	If the water system exceeds the MCL for total coliforms specified in 40 CFR 141.63, is the State notified no later than the end of the next business day after it learns of the exceedance,	N/A		

STANDARD ECE AUDIT - CHARLESTON NSY/FISC/NS
FEDERAL REGULATIONS AND POLICY

Auditor: MICHAEL PATE

Date: 10/28/96 To 10/31/96

REGULATORY CITATION	AUDITOR'S CHECKLIST - PW	Y/N N/A N/R	COMMENTS	FIND #
	(Continuation) and is the public notified in accordance with 40 CFR 141.32?			
40 CFR 141.21 (g)(2)	if the water system fails to comply with a coliform monitoring requirement, including the sanitary survey requirement (if applicable), is the State notified within 10 days and notify the public in accordance with 40 CFR 141.32?	N/A		
	<p style="text-align: center;">RADIOACTIVITY</p> <p>NOTE: Radioactive parameters apply only to community water systems.</p>	N/A		
40 CFR 141.15 - and - 40 CFR 141.16	Does the water system satisfy MCLs for radioactive parameters? NOTE: MCLs for radioactive parameters are as follows:			
	<ul style="list-style-type: none"> - combined radium 226 and radium 228: 5pCi/l - gross alpha particle activity: 15pCi/l (includes radium 226 but excludes radon and uranium) - tritium: 20,000 pCi/l - strontium: 8 pCi/l 			
40 CFR 141.26 (a)(1)	Gross alpha particle activity, radium 226, and radium 228: Is compliance based on the analysis of an annual composite of 4 consecutive quarterly samples or the average of analysis of 4 samples obtained at quarterly intervals?	N/A		
	NOTE: See NOTE under 40 CFR 141.26(a)(3).			
40 CFR 141.26 (a)(1)(ii)	When gross alpha particle activity exceeds 5 pCi/l, is the same or equivalent sample analyzed for radium 226? Likewise, if the concentration of radium 226 exceeds 3 pCi/l, is the same or equivalent sample analyzed for radium 228?	N/A		
40 CFR 141.26 (a)(3)	Does the water system monitor at least once every 4 years for gross alpha particle activity, radium 226, and radium 228 following procedures specified in 141.26(a)(1)?	N/A		
	<p>NOTE: When an annual record taken in conformance with 141.26(a)(1) establishes that the average annual concentration is less than half the MCLs specified in 141.15, analysis of a single sample may be substituted for the quarterly sampling procedure required by 141.26(a)(1).</p> <p>Unless required by the State, monitoring for compliance with 141.15 after the initial monitoring period need not include radium 228 provided radium 228 has been assayed at least once using procedures specified in 141.26(a)(1).</p> <p>If required by the State, water systems shall conduct annual monitoring for radium 226 if the radium 226 concentration exceeds 3 pCi/l.</p>			

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40 CFR 141.26 (b)(1)	<p>For community water systems using surface waters and supplying more than 100,000 individuals, are samples for manmade radioactivity based on the analysis of a composite of 4 consecutive quarterly samples or the average of 4 samples obtained at quarterly intervals?</p> <p>NOTE: No further analysis is necessary if the gross beta particle activity is less than 50 pCi/l and if the average annual concentration of tritium and strontium 90 is less than 20,000 and 8 pCi/l, respectively, and provided that if both radionuclides are present the sum of their annual dose equivalents to bone marrow does not exceed 4 millirem/year.</p>	N/A		
40 CFR 141.26 (b)(1)(i)	<p>If the gross beta particle activity exceeds 50 pCi/l, is an analysis of the sample performed to identify the major radioactive constituents present and are calculations performed to determine the appropriate organ and total body doses to determine compliance with 40 CFR 141.16?</p>	N/A		
40 CFR 141.26 (b)(1)(iii)	<p>Is groundwater monitored for manmade radioactivity at the discretion of the State?</p>	N/A		
40 CFR 141.26 (b)(3)	<p>After the initial analysis is performed under 40 CFR 141.26(b)(1), does the water system monitor at least every 4 years following the procedure given in 40 CFR 141.26(b)(1)?</p> <p>NOTE: See NOTE under 40 CFR 141.26(b)(1).</p>	N/A		
40 CFR 141.26 (b)(4)(i) - (iii)	<p>If waters are contaminated by effluents from nuclear facilities, is monitoring conducted as specified?</p> <p>NOTE: For waters contaminated by effluents from nuclear facilities, the following applies: - gross beta particle activity must be monitored quarterly based on analysis of monthly samples or a composite of 3 monthly samples; - iodine 131 must be monitored quarterly based on composite of 5 consecutive daily samples taken quarterly (more frequently if ordered by the State); and - strontium 90 and tritium must be monitored annually based on the composite of 4 consecutive quarterly samples or analysis of 4 quarterly samples.</p>	N/A		
40 CFR 141.26 (b)(5)	<p>If the average annual MCL for man-made radioactivity is exceeded, does the water system give notice to the State pursuant to 40 CFR 141.31; and give notice to the public pursuant to 40 CFR 141.32; and in addition, is monitoring continued at monthly intervals until the concentration no longer exceeds the MCLs, or until other conditions are met as specified by the State?</p>	N/A		
	SODIUM	N/A		
40 CFR 141.41 (a)	<p>Are water samples collected and analyzed for sodium at least annually for surface water sources</p>			

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REGULATORY CITATION	AUDITOR'S CHECKLIST - PW	Y/N N/A N/R	COMMENTS	FIND #
	(Continuation) and at least every 3 years for groundwater sources (the number of samples shall be based on the number of treatment plants)?			
40 CFR 141.41 (c)	Does the water system notify appropriate local and State public health officials of the sodium levels by written notice by direct mail within 3 months and a copy sent to EPA and/or the State within 10 days of its issuance, unless the State provides such notices in lieu of the water system?	N/A		
	CORROSIVITY CHARACTERISTICS	N/A		
40 CFR 141.42 (d)	Has the water system identified whether the specified construction materials are present in the distribution system and reported this information to the State?			
	<p>NOTE: Applicable construction materials include:</p> <ul style="list-style-type: none"> - lead from piping, solder, caulking, interior lining of distribution mains, alloys, and home plumbing - copper from piping and alloys, service lines, and home plumbing - galvanized piping materials such as cast iron and steel - asbestos cement pipe - other materials as required by the State. 			
	FILTRATION/DISINFECTION	N/A		
40 CFR 141.70; 40 CFR 141.71; - and - 40 CFR 141.72 (a)	<p>If the water system (1) uses a surface water source or a ground water source under the direct influence of surface water and (2) does not provide filtration treatment, does it satisfy the criteria for avoiding filtration?</p> <p>NOTE: For the majority of water systems, the answers to questions pertaining to 40 CFR 141.70 through 141.75 will be "N/A" since the majority will NOT use a surface water source or ground water source under the influence of surface water. If checklist question does apply, the following criteria for avoiding filtration must be satisfied:</p> <ul style="list-style-type: none"> - fecal coliform concentration must be equal to or less than 20/100ml AND/OR total coliform concentration must be equal to or less than 100/100ml of total coliform in at least 90% of the measurements made for the previous 6 months or 11 of the last 12 months; - turbidity cannot exceed 5 NTU; - at least 99.99% inactivation of Giardia lamblia cysts and viruses; - disinfection system must have redundant components including auxiliary, automatic start-up power supply and alarm system to ensure disinfectant application OR automatic shut-off of water to distribution system when disinfectant residual is less than 0.2 mg/l; - the residual disinfectant concentration in 			

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REGULATORY CITATION	AUDITOR'S CHECKLIST - PW	Y/N N/A N/R	COMMENTS	FIND #
	<p>(Continuation)</p> <ul style="list-style-type: none"> - water entering the distribution system cannot be less than 0.4 mg/l for more than 4 hours; - residual disinfectant in the distribution system cannot be undetectable in more than 5% of samples each month for any 2 consecutive months; - the water system maintains a watershed control program which minimizes the potential for contamination by Giardia lamblia cysts and viruses in the source water; - the water system is subject to an annual on-site inspection of the watershed control program and disinfection treatment process; - the water system must not be subject to waterborne disease outbreak; - the water system must comply with the MCL for total coliforms in 40 CFR 141.63 at least 11 out of 12 previous months; and - the water system must comply with requirements for trihalomethanes in 40 CFR 141.12 and 141.30. 			
40 CFR 141.73 (a)-(d)	If the water system (1) uses a surface water source or a ground water source under the direct influence of surface water and (2) does not satisfy criteria for avoiding filtration specified under 40 CFR 141.71(a)-(b), is filtration provided by June 29, 1993 or within 18 months of the failure to meet criteria for avoiding filtration in 40 CFR 141.71(a)-(b), and does filtration comply with requirements specified in 40 CFR 141.73(a)-(d)?	N/A		
40 CFR 141.72	If the water system (1) uses a surface water source or a ground water source under the direct influence of surface water and (2) provides filtration treatment, is disinfection treatment provided as of June 29, 1993, or beginning when filtration is installed, whichever is later?	N/A		
40 CFR 141.72 (b)(1)-(3)	For the water system which (1) uses a surface water source or a ground water source under the direct influence of surface water and (2) provides filtration treatment, does disinfection satisfy specified criteria? NOTE: Disinfection must satisfy the following criteria: - achieve at least 99.9% inactivation and/or removal of Giardia lamblia cysts and 99.99% inactivation and/or removal of viruses; - chlorine residual cannot be less than 0.2 mg/l for more than 4 hours; and - the residual disinfectant concentration in the distribution system cannot be undetectable in more than 5% of the samples each month for any 2 consecutive months.	N/A		
40 CFR 141.74 (a)-(c)	Are analytical and monitoring requirements to demonstrate compliance with 40 CFR 141.71, 141.72, and 141.73 properly performed? NOTE: Regarding 40 CFR 141.74(a)-(c), there	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - PW	Y/N N/A N/R	COMMENTS	FIND #																								
	(Continuation) are too many requirements to list here. Time constraints in accomplishing the ECE prevents an in-depth survey of the laboratory procedures. This question should be answered "YES" if the laboratory or individual is State certified or approved, as applicable, and there are no obvious discrepancies noted by the State regulatory agency.																											
40 CFR 141.75	Do reporting and recordkeeping requirements regarding 40 CFR 141.71, 141.72, and 141.73 comply with 141.75?	N/A																										
	LEAD AND COPPER	YES																										
40 CFR 141.43	Are all pipe, solder, and flux used in the installation or repair of the activity public water system (also includes internal plumbing) considered lead-free? NOTE: The term "lead-free" refers to solder and flux containing not more than 0.2% lead and, when used with respect to pipes and pipe fittings, refers to pipes and pipe fittings containing not more than 8% lead.																											
40 CFR 141.86 (d)(1)	Has the water system monitored for lead and copper for each 6 month period beginning on the following dates based on system size? <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>SYSTEM SIZE (No. People Served)</th> <th>MONITORING PERIOD BEGINS ON</th> </tr> </thead> <tbody> <tr> <td>>50,000</td> <td>January 1, 1992</td> </tr> <tr> <td>3,301 to 50,000</td> <td>July 1, 1992</td> </tr> <tr> <td><3,300</td> <td>July 1, 1993</td> </tr> </tbody> </table> NOTE: An exemption from lead and copper monitoring may have been obtained based on 40 CFR 141.3 or 141.29. If so, the exemption should preferably be in writing and the water system should communicate with the water supplier to be informed of actions being taken to maintain/achieve compliance. If an exemption has been obtained, the following questions for regulatory lead and copper requirements should be answered "N/A".	SYSTEM SIZE (No. People Served)	MONITORING PERIOD BEGINS ON	>50,000	January 1, 1992	3,301 to 50,000	July 1, 1992	<3,300	July 1, 1993	N/A	Charleston NSY/FISC/NS was exempted from the lead and copper monitoring by DHEC in February 1993.																	
SYSTEM SIZE (No. People Served)	MONITORING PERIOD BEGINS ON																											
>50,000	January 1, 1992																											
3,301 to 50,000	July 1, 1992																											
<3,300	July 1, 1993																											
40 CFR 141.86 (c)	Has the water system collected one sample during each six month monitoring period at the number of sites for standard monitoring below unless approved for reduced sites under 40 CFR 141.86(d)(4)? <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>SYSTEM SIZE (No. People Served)</th> <th colspan="2">NO. OF MONITORING SITES</th> </tr> <tr> <td></td> <th>Standard</th> <th>Reduced</th> </tr> </thead> <tbody> <tr> <td>>100,000</td> <td>100</td> <td>50</td> </tr> <tr> <td>10,001 to 100,000</td> <td>60</td> <td>30</td> </tr> <tr> <td>3,301 to 10,000</td> <td>40</td> <td>20</td> </tr> <tr> <td>501 to 3,300</td> <td>20</td> <td>10</td> </tr> <tr> <td>101 to 500</td> <td>10</td> <td>5</td> </tr> <tr> <td><100</td> <td>5</td> <td>5</td> </tr> </tbody> </table>	SYSTEM SIZE (No. People Served)	NO. OF MONITORING SITES			Standard	Reduced	>100,000	100	50	10,001 to 100,000	60	30	3,301 to 10,000	40	20	501 to 3,300	20	10	101 to 500	10	5	<100	5	5	N/A		
SYSTEM SIZE (No. People Served)	NO. OF MONITORING SITES																											
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REGULATORY CITATION	AUDITOR'S CHECKLIST - PW	Y/N N/A N/R	COMMENTS	FIND #
40 CFR 141.86 (b)	Do sample collection methods comply with first draw and location requirements with the exception of lead service line samples collected under 40 CFR 141.84(c)?	N/A		
40 CFR 141.80 (c)	Do tap water samples collected in accordance with 40 CFR 141.86 comply with the lead and copper action levels? NOTE: The water system is in compliance with the lead and copper action levels if 10% or less of the samples exceed 0.015 mg/l for lead and 1.3 mg/l for copper.	N/A		
40 CFR 141.87 (a) and (b)	Does the water system monitor for the specified water quality parameters during each six month monitoring period in which the system exceeds the lead or copper level? NOTE: Although water quality samples are not required unless the lead or copper action level is exceeded, it is advisable to collect and analyze these samples when the tap samples are obtained. This will ensure that the sample's corrosivity characteristics are representative of the nature of tap water causing exceedance of the action levels. Water quality parameters include the following: - pH - alkalinity - orthophosphate (when an inhibitor containing a phosphate compound is used) - silica (when an inhibitor containing a silicate compound is used) - calcium - conductivity; and - water temperature.	N/A		
40 CFR 141.88 (a) and (b)	Does the water system, if it fails to meet the lead or copper action level based on tap samples collected in accordance with 40 CFR 141.86, collect lead and copper source water samples in accordance with requirements regarding sample location, number of samples, and collection methods specified in 40 CFR 141.23(a)(1)-(4)? NOTE: Source water samples associated with lead and copper regulations should apply only to those water systems which supply their own water; however, clarification should be obtained from the applicable State regulatory authority. The timing of source water samples shall be in accordance with 40 CFR 141.88(b)-(c) instead of those dates specified in 40 CFR 141.23(a)(1)-(2).	N/A		
40 CFR 141.80 (d) - and - 40 CFR 141.81 - and - 40 CFR 141.82	Has the small or medium size water system, if required, pursued or completed (based on current date of this ECE vs. applicable timeframes for action items) the corrosion control treatment steps specified in 40 CFR 141.81(e)(1)-(8), unless it is deemed to have optimized corrosion control	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - PW	Y/N N/A N/R	COMMENTS	FIND #
	<p>(Continuation) under 40 CFR 141.81(b)(1)-(3)?</p> <p>NOTE: A detailed description of the corrosion control treatment actions/steps is provided in 40 CFR 141.82.</p>			
40 CFR 141.80 (e) - and - 40 CFR 141.83	<p>Has the water system performed source water treatment requirements if lead and copper action levels are exceeded?</p> <p>NOTE: A detailed description of the source water treatment requirements are specified in 40 CFR 141.83.</p>	N/A		
40 CFR 141.80 (f) - and - 40 CFR 141.84	<p>If the water system fails to meet the lead action level in tap samples taken pursuant to 40 CFR 141.86(d)(2), after installing corrosion control and/or source water treatment (if applicable), has the water system proceeded to replace lead service lines?</p>	N/A		
40 CFR 141.80 (g) - and - 40 CFR 141.85	<p>If the water system exceeds the lead action level based on tap water samples collected in accordance with 40 CFR 141.86, has the water system implemented public education requirements?</p>	N/A		
40 CFR 141.90	<p>Does the water system comply with all reporting requirements pertaining to the following:</p> <ul style="list-style-type: none"> - lead, copper, and water quality parameter monitoring; - source water monitoring; - corrosion control treatment; - source water treatment; - lead service line replacement; - public education programs; and - additional monitoring data? 	N/A		
40 CFR 141.91	<p>Does the water system retain the records required under 40 CFR 141.81 through 141.88 for a minimum of twelve (12) years?</p> <p>NOTE: Records associated with lead and copper regulations should include the following:</p> <ul style="list-style-type: none"> - all sampling data and analyses reports; - surveys, letters, evaluations, schedules, State determinations; and - any other information required by 40 CFR 141.81 through 141.88. <p>Obviously, 12 years have not passed since the lead and copper regulations were enacted. If the water system has performed monitoring relating to this citation and has retained records to date, answer this question "YES" assuming the water system will comply with the 12 year requirement. If the water system has performed monitoring relating to this citation and has not retained the records, answer this question "NO".</p>	N/A		
OPNAVINST 5090.1B 8-5.3	<p>Have all drinking water coolers been sampled for lead according to the "screening" and, if necessary, "full" protocol sampling procedures developed by COMNAVFACENGCOM in April 1990?</p>	YES		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - PW	Y/N N/A N/R	COMMENTS	FIND #
	<p>(Continuation)</p> <p>Chloride 250 mg/l Color 15 color units Copper 1 mg/l Corrosivity non-corrosive Fluoride 2.0 mg/l Foaming agents 0.5 mg/l Iron 0.3 mg/l Manganese 0.05 mg/l Odor 3 TON* pH 6.5 - 8.5 Silver 0.1 mg/l Sulfate 250 mg/l Total Dissolved Solids (TDS) 500 mg/l Zinc 5 mg/l</p> <p>* Threshold odor number</p>			
40 CFR 143.4 (a)	Does the activity monitor for secondary contaminants listed in 40 CFR 143.3 on a frequency not less than once annually for water systems utilizing surface water sources and not less than once every three years for water systems utilizing ground water sources?	N/A		
40 CFR 143.5	Does the activity provide proper public notification to its customers if the SMCL for fluoride is exceeded?	N/A		
	CROSS-CONNECTION/BACKFLOW PREVENTION	N/A		
GENERAL COMMENT	<p>A cross-connection control program includes, at a minimum, written and implemented policy, procedures, and instructions for installing, inspecting, testing, and maintaining backflow preventers. Recognizing the fact that many activities may not have a coordinated program and that some regulatory agencies issue little guidance regarding compliant programs, CNO and NAVFACHQ are in the process of developing a Navy-wide Cross-Connection Control Program Guidance Document. In addition, a software support package is being developed which will enable activities to database information associated with the program. Upon issuance, activities would be expected to implement cross-connection control procedures to the maximum extent necessary for full compliance.</p> <p>In the interim, the following questions will give the ECE evaluator, activity, and Major Claimant a general indication of the current level of activity awareness and implementation regarding cross-connection control. Deficiencies should be noted with recommendations that the activity start taking obvious actions to render compliance (e.g. certification training, programming funds for studies, developing an inventory of known backflow preventers, etc.).</p>			
OPNAVINST 5090.1B 8-5.4, 8-4.7 - and -	Is a conscientious effort being made to identify basewide backflow preventer deficiencies both internal and external to facilities served by potable water?	YES	Charleston NSY/FISC/NS was evaluated in January/February 1993 for backflow preventor deficiencies.	

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REGULATORY CITATION	AUDITOR'S CHECKLIST - PW	Y/N N/A N/R	COMMENTS	FIND #
State Regs	<p>(Continuation)</p> <p>NOTE: Per the Cross-Connection Control Program Guidance Document being developed by SOUTHDIV, investigations are to be performed by cross-connection control representatives. "Cross-connection control representatives" is a SOUTHDIV coined term defined as individuals having appropriate certification via state approved certification courses to inspect and test backflow preventers. These courses also provide instruction regarding identification of deficiencies, appropriate backflow preventers to use based on the degree of hazard or type of contaminating process, etc. Representatives can be certified activity personnel, certified BOS contractor personnel, or certified PWC or private contractor personnel.</p> <p>The investigative effort should be either an initial basewide study followed by annual re-inspection of all facilities for deficiencies or, if an initial basewide study has not been accomplished, the activity should be making a conscientious effort to systematically inspect all facilities for deficiencies within a reasonable timeframe. If nothing has been done but funding for a study has been requested by either the activity or the EFD, this should be noted in the comments.</p>			
OPNAVINST 5090.1B 8-5.4, 8-4.7 - and - State Regs	<p>Does the activity have cross-connection control representatives?</p> <p>NOTE: It is suggested that activities have Government cross-connection control representatives in several job disciplines which could involve cross-connection control issues. These disciplines include, but are not limited to, the following: environmental, quality assurance evaluators, plumbing/maintenance shops, ROICC, etc.</p>	YES		
OPNAVINST 5090.1B 8-5.4, 8-4.7 - and - State Regs	<p>Does the activity have a written inventory of existing backflow preventers?</p> <p>NOTE: The written inventory should include such entries as the following:</p> <p>facility (building) no. backflow preventer identification no. location exterior or interior to building (e.g. fire or domestic service line, room no., source of contamination protected against, etc.) manufacturer, type, size, model no., and serial no. of backflow preventer</p>	YES	The backflow preventors are identified in the 1993 study.	
OPNAVINST 5090.1B 8-5.4, 8-4.7 - and - State Regs	<p>Are existing backflow preventers inspected and tested on a routine basis by certified personnel (cross-connection control representatives)?</p>	NO	OPNAVINST 5090.1B and the South Carolina Primary Drinking Water Regulations require that existing backflow preventors be inspected and tested on a routine basis. The backflow preventors on the main feed lines into the Charleston Base Complex are inspected and tested by personnel with the Commissioners of Public Works. However, the backflow preventors within the base are not	PW 002

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	(Continuation)		inspected or tested.	
OPNAVINST 5090.1B 8-5.4, 8-4.7 - and - State Regs	Is the repair/replacement of defective backflow preventers performed in a timely manner?	YES		
OPNAVINST 5090.1B 8-5.4, 8-4.7 - and - State Regs	Are records maintained regarding inventory, certification, repair/maintenance, etc. of existing backflow preventers?	YES		
	WELLHEAD PROTECTION	N/A		
OPNAVINST 5090.1B 8-5.1(f) - and - State Regs	Is the water system complying with applicable regulations regarding wellhead protection? NOTE: Wellhead protection applies only to public water systems which operate groundwater wells but does not apply to public water systems which purchase all drinking water from another water system. In general, requirements include developing a wellhead protection plan including such items as protection/management zones around wells, development of contaminant source inventories, implementation of a wellhead protection program, etc.			
	WATER CONSERVATION	N/A		
State Regs	If required by the State or local regulatory agency, has the activity submitted information to the regulatory agency regarding the status of water conservation implementation?			
OPNAVINST 5090.1B 8-5.5 - and - State Regs	Has the activity taken action to implement a water conservation program? NOTE: Where consumptive use permits are required, water conservation requirements will usually be addressed under the permit. According to OPNAVINST 5090.1B Section 8-5.5, initial emphasis is to be placed on the use of water in industrial processes and the priorities of the program are economic payback and conservation of water as a declining resource. States may have different priorities for emphasis which must be addressed. Actions to implement water conservation could include submittal of a water conservation plan to the applicable regulatory agency, completion of a water conservation study, installation of water conserving devices, etc.	N/A	Due to the closure of the base and low water consumption, a formal water conservation program is not justified.	
	EQUIPMENT REQUIREMENTS	N/A		
GENERAL COMMENT	Due to innumerable questions which could be asked regarding water system equipment, questions will be limited to equipment items which are known to be commonly occurring environmental concerns or for which a Notice of Violation (NOV) has been			

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	(Continuation) received at one or more Navy/Marine Corps installations. It is believed that these equipment items are required in most, if not all, state regulations or operating permits. As mentioned under the "PERMITS" section of this checklist, care should be taken not to duplicate deficiencies noted elsewhere in this checklist.			
State Regs	Are monitors and alarms provided for locations where disinfection chemicals are injected to detect interruptions in chemical feed?	N/A		
State Regs	Are alarm systems existing and operable to detect chlorine gas leakage?	N/A		
State Regs	If chlorine injection equipment is located in a separate enclosed room, is an exhaust fan/blower provided OR is an intake fan/blower provided which is located higher than a separate vent opening AND can the exhaust/intake vent fan/blower be turned on from outside the room?	N/A		
State Regs	Are potable/irrigation water wells equipped with flowmeters and are the flowmeters calibrated on a routine basis?	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - SPCC	Y/N N/A N/R	COMMENTS	FIND #
40 CFR 112.1 (d)	Has facility prepared an SPCC Plan if capacity to store oil exceeds: - 42,000 gallons underground; - 1,320 gallons aboveground; or - 660 gallons in a single aboveground container?	YES	See SPCC General Comment 1.	
40 CFR 112.3 (d)	Was the SPCC Plan certified by a Professional Engineer?	N/R	See SPCC General Comment 1.	
40 CFR 112.3 (a)	Were recommendations in the SPCC Plan implemented within six months, unless a time extension was granted by the EPA Regional Administrator in accordance with 40 CFR 112.3(f)?	N/R	See SPCC General Comment 1.	
40 CFR 112.4 (a)	If the activity discharged more than 1000 gallons of oil in a single spill, or any quantity in two or more spills in any 12 month period, was the SPCC Plan submitted to EPA and State for review within 60 days of the spill?	N/A	N/A. Has not occurred.	
40 CFR 112.5 (b) - and - OPNAVINST 5090.1B 9-4.2	Are the required three-year SPCC Plan reviews accomplished on schedule and certified by a Professional Engineer?	NO	There is no single current plan. There are currently three plans for this activity as there were three different command associated with the subject properties. These are in the process of being combined; see gen comment 1. Two of the three plans are out of date for review.	SPCC 001
40 CFR 112.5 (a)	Does the SPCC Plan contain an amendment covering changes in facility design, construction, operation, or maintenance which affects the facility's potential to discharge oil to navigable waters?	N/R	See SPCC General Comment 1.	
40 CFR 112.5 (b)	Have amendments to the SPCC Plan been certified by a Professional Engineer?	N/R	See SPCC General Comment 1.	
40 CFR 112.7	Are SPCC Plans prepared in accordance with good engineering practices?	N/R	See SPCC General Comment.	
40 CFR 112.7	Does the SPCC Plan have management approval at a level that can commit resources to implement the plan?	N/R	See SPCC General Comment 1.	
40 CFR 112.3 (e)	Is a copy of the SPCC Plan located at each facility that is occupied at least eight hours a day?	N/A	No facility is being occupied eight hours a day.	
40 CFR 112.7 (e)(ii)	Are bulk tanks constructed with impervious secondary containment with capacity to contain the contents of the largest tank, plus adequate freeboard for precipitation?	N/A	See SPCC General Comment 1.	
40 CFR 112.7 (e)(2)(iii)(D)	Is the drainage of precipitation accumulated in bulk tank diked areas conducted under responsible supervision; is contaminated drainage treated or removed prior to discharge; and are drainage logs maintained of the operation?	N/R	See SPCC General Comment 1.	
40 CFR 112.7 (e)(2)(viii)	Are new and old tank installations, as far as practicable, fail-safe engineered to avoid spills by one or more of the following means: - high liquid level alarms at a constantly manned operation;	N/R	See SPCC General Comment 1.	

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	(Continuation) - automatic cut-offs (considering size and complexity of the facility); - direct audible or code signal communication between tank gauger and pumping station; and - a fast response system for determining the level in each tank which are regularly tested to ensure proper operation?			
40 CFR 112.7 (e)(9)(ii)	Are all tank valves and dike drainage valves which could permit flow of oil to navigable water closed and locked when in non-use or standby status?	N/R	See SPCC General Comment 1.	
40 CFR 112.7 (e)(2)(vi)	Are bulk aboveground tanks subjected to periodic integrity testing and/or inspection?	N/R	See SPCC General Comment 1.	
40 CFR 112.7 (e)(2)(iv)	Are underground metallic tanks protected by coatings or a cathodic protection system and periodically pressure-tested where practicable?	N/R	Most UST have been pumped down , if not also cleaned. Status of tanks changing on daily basis. Soon no tank will pose a threat.	
40 CFR 112.7 (e)(3)(i)	Are buried piping installations coated and cathodically protected where soil conditions warrant?	N/R	See above comment.	
40 CFR 112.7 (e)(3)(iv)	Is piping periodically pressure-tested where pipe failure could lead to a spill event?	N/R	See above comment.	
40 CFR 112.7 (e)(2)(vii)	Are steam return or exhaust lines from internal heating coils which discharge to a watercourse monitored for contamination, or passed through a retention or separation device?	N/R	See SPCC General Comment 1.	
40 CFR 112.7 (e)(2)(xi)	Are mobile tanks provided with secondary containment and located in areas that are not subject to periodic flooding?	NO	Currently detachment is using a mobile fueler and mobile tanks to remove fuel during tank closure. These tanks are not being maintained in bermed areas when not in use.	SPCC 002
40 CFR 112.7 (e)(4)(iii)	Are truck loading/unloading racks provided with interlocked warning lights to prevent vehicle departure prior to complete disconnection of hoses?	NO	The only fueling taking place under the Navy cognizance is where the detachment pumps fuel from a tank to the mobile fueler or from the tank being removed to a mobile tank.	SPCC 003
40 CFR 112 (e)(4)(ii)	Are tank truck/car loading/unloading racks provided with a physical barrier, warning lights or with secondary containment capacity to hold the contents of the largest compartment of any truck or car expected to use the facility?	N/A	See OHS General Comment 1.	
40 CFR 112.7 (e)(8)	Are records of all inspections required by the SPCC Plan signed by an appropriate supervisor or inspector and maintained as part of the Plan for a period of three years?	N/R	See SPCC General Comment 1.	
40 CFR 112.7 (e)(9)(i)	Are oil storage handling facilities fenced and locked when unattended?	N/A	See SPCC General Comment 1.	
40 CFR 112.7 (e)(9)(iii)	Is the starter control on all oil pumps locked in the "off" position and accessible only to authorized personnel when in non-operating or non-standby status?	N/R	See SPCC General Comment 1.	
40 CFR 112.7 (e)(9)(v)	Is facility lighting, where appropriate, adequate for discovery of spills, and a deterrence for	N/R	See SPCC General Comment 1.	

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	(Continuation) vandalism?			
40 CFR 112.7 (e)(10)(iii)	Are spill prevention briefings conducted at frequent intervals?	YES		
40 CFR 112.7 (e)(10)(i)	Are personnel properly trained in the operation and maintenance of equipment to prevent oil spills, and informed of applicable pollution control laws, regulations, and rules?	YES		
40 CFR 112.7 (e)(10)(ii)	Does each facility have a spill prevention coordinator who reports to line management?	YES		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - UST	Y/N N/A N/R	COMMENTS	FIND #
40 CFR 280.11	<p>SUBPART A - PROGRAM SCOPE AND INTERIM PROHIBITION</p> <p>Are all underground storage tank (UST) systems installed after 7 May 1985 constructed to prevent releases due to corrosion or structural failure for the operational life of the system?</p> <p>NOTE:</p> <p>1. "Deferred" UST systems include wastewater treatment tanks, tanks containing radioactive material, emergency generator tanks located at nuclear power generation facilities, airport hydrant fuel distributions, and field-constructed systems.</p> <p>2. All implementing agencies do not defer all UST systems listed in 40 CFR 280.10. Check appropriate implementing agency UST regulations for what UST Systems are exempt from UST regulation and what UST System are deferred from certain UST Regulations.</p>	YES		
40 CFR 280.20 (d)	<p>SUBPART B - DESIGN, CONSTRUCTION, INSTALLATION, AND NOTIFICATION</p> <p>Are new UST systems installed according to manufacturers' instructions?</p>	YES		
40 CFR 280.20 (a)	<p>Are new UST systems properly designed and constructed in accordance with a code of practice developed by a nationally recognized association or independent testing laboratory?</p> <p>NOTE: "New" UST system means any UST (excluding deferred USTs) installed after 22 Dec 88.</p>	YES		
40 CFR 280.20 (a)	<p>Are new UST systems (and existing UST systems by 22 December 1998) protected from corrosion by one of the following methods where soil conditions warrant:</p> <ul style="list-style-type: none"> - fiberglass or fiberglass-reinforced plastic; - steel with suitable dielectric coating and a cathodic protection system; - steel fiberglass-reinforced plastic composite or; - State agency-approved tank design? 	YES		
40 CFR 280.20 (b)	<p>Is piping on new UST systems (and existing UST systems by 22 December 1998) protected from corrosion by one of the following methods:</p> <ul style="list-style-type: none"> - piping constructed of fiberglass-reinforced plastic; - piping constructed of steel and cathodically protected; - piping constructed of metal without additional corrosion protection measures provided that site is determined by a corrosion expert to be not corrosive enough to cause a release due to corrosion; or - piping construction and corrosion protection is approved by the state agency? 	NO	<p>40 CFR 280.20 (b) requires that the piping on new UST systems be protected from corrosion. Tank 242 has steel piping that is not cathodically protected. The soil at Tank 242 has not been determined by a corrosion expert to be non corrosive.</p>	UST 001

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40 CFR 280.20 (c)	<p>Except for USTs filled by transfer of less than or equal to 25 gallons at one time, are new UST systems (and existing systems by 22 December 1998 or alternate time set by implementing agency before 22 Dec 1998) equipped with one of the following systems:</p> <p>(1) spill prevention and overfill devices using a spill catchment basin and one of the following appropriately designed devices:</p> <ul style="list-style-type: none"> - automatic shutoff at 95% capacity; - flow restriction to alert the operator at 90% capacity; or - a high level alarm to alert the operator at 90% capacity; or <p>(2) alternate equipment approved by the implementing agency that is no less protective than that required under (1)?</p>	YES		
40 CFR 280.20 (e)	<p>Have all new UST system been:</p> <ul style="list-style-type: none"> - installed by an installer certified by the tank or piping manufacturer, - installed by an installer licensed by the implementing agency; - inspected and certified by a registered professional engineer with education and experience in UST system installation; - inspected and approved by the implementing agency; - installed in accordance with manufacturer's installation checklists; or - installed by some other method approved by the implementing agency? 	YES		
40 CFR 280.22	<p>Are existing USTs and USTs taken out-of-service after 1 January 1974 registered with the proper state agency?</p>	NO	<p>40 CFR 280.22 requires that existing USTs and USTs taken out-of-service after 1 January 1974 be registered with the proper state agency. Tank FBM 61-2 and tank 681-1 are waste oil tanks and are not registered with the state agency.</p>	UST 002
40 CFR 280.22	<p>Are UST systems installed after 8 May 1986 and new UST systems registered within 30 days of the tank's initial use, or as required by the proper State agency?</p>	YES		
40 CFR 280.22	<p>If a state agency has its own UST registration form, is that form being used to register USTs?</p>	YES		
	SUBPART C - GENERAL OPERATING REQUIREMENTS	YES		
40 CFR 280.30	<p>Does facility ensure that releases due to spilling or overfilling of USTs do not occur?</p>			
40 CFR 280.30	<p>Does the facility report, investigate, and cleanup any spill and overfills of USTs in accordance with 40 CFR 280.53?</p>	YES		
40 CFR 280.31 (a)	<p>If the facility has a steel UST system with corrosion protection, does the facility comply with requirements to ensure that releases due to corrosion are prevented for as long as the UST system is used to store regulated substances?</p>	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - UST	Y/N N/A N/R	COMMENTS	FIND #
40 CFR 280.31 (b) and (c)	Are UST systems equipped with cathodic protection systems inspected for proper operation by a qualified cathodic protection tester in accordance with following: - tested within 6 months of installation and at least every 3 years thereafter; and - impressed current systems inspected every 60 days to ensure proper operations?	N/A		
40 CFR 280.31 (d)	Are the following records maintained for UST systems with cathodic protection: - results of the last 3 impressed current system inspections; - results of the last 2 inspections made by the cathodic protection tester?	N/A		
40 CFR 280.32	Does the facility ensure that UST systems are made of, or lined with, materials that are compatible with the substance stored in the systems?	YES		
40 CFR 280.33 (a)	Are repairs to UST systems made in accordance with a code of practice developed by a nationally recognized association or independent testing laboratory?	N/A	No repairs were made.	
40 CFR 280.33 (b)	Are repairs to fiberglass tanks made by the manufacturer's authorized representatives or in accordance with a code of practice developed by a nationally recognized association or independent testing laboratory?	N/A	No repair to fiberglass systems has been made.	
40 CFR 280.33 (c)	Have metal pipe sections and fittings that have released product due to corrosion or damage been replaced; and has fiberglass piping, that has released product due to damage, been either replaced or repaired in accordance with the manufacturer's specifications?	N/A		
40 CFR 280.33 (d)	Have repaired tanks and piping been tightness tested within 30 days following repairs, except as noted below: - repaired tank is internally inspected; - repaired portion is monitored monthly for releases in accordance with 40 CFR 280.43(d) through (h); or - repaired tank is tested by alternate method approved by the implementing agency?	N/A		
40 CFR 280.33 (e)	Are the cathodic protection systems of repaired UST systems with cathodic protection, tested within 6 months following repair in accordance with 40 CFR 286.31(b) and (c)?	N/A	No UST system has cathodic protection.	
40 CFR 280.33 (f)	Are records maintained of each UST system repair for the remaining operating life of the system?	N/A		
40 CFR 280.34 (a)	Have the following records been submitted to the implementing agency: - notification of all UST systems required by 40 CFR 280.22; - certification of installation for new UST systems required by 40 CFR 280.20(e); - reports of all releases or suspected releases per 40 CFR 280.50, spills and overfills per 40	YES	40 CFR 280.34(a) requires that notification of all UST systems be submitted to the implementing agency. The records of tanks 681-1 and FBM 61-2 have not been submitted. This is a result of the tanks not being registered.	

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REGULATORY CITATION	AUDITOR'S CHECKLIST - UST	Y/N N/A N/R	COMMENTS	FIND #
	(Continuation) CFR 280.53, and confirmed releases per 40 CFR 280.61; - corrective actions planned or taken (including initial abatement measures) per 40 CFR 280.62; - initial site characterization per 40 CFR 280.63; - free product removal per 40 CFR 280.64; - investigation of soil and ground-water cleanup per 40 CFR 280.65; - corrective action plan per 40 CFR 280.66; and - notification before permanent closure or change-in-service per 40 CFR 280.71?			
40 CFR 280.34 (b)	Are the following records maintained on UST systems: - corrosion expert's analysis of site corrosion potential if corrosion protection is not provided per 40 CFR 280.20(a)(4) and (b)(3); - documentation of operation of corrosion protection equipment per 40 CFR 280.31; - documentation of UST system repairs per 40 CFR 280.33(f); - compliance with release detection requirements per 40 CFR 280.45; and - results of site investigation conducted at permanent closure per 40 CFR 280.74?	NO	40 CFR 280.34(b) requires owners and operators maintain records of recent compliance with release detection requirements. Release detection records are not being maintain for the waste oil tanks FBM 61-2, 681-1 and 38-1. This is a result of the absence of release detection methods/procedures for these tanks.	UST 003
40 CFR 280.34 (c)	Are required maintenance records kept: - at the UST site; or - at an alternate site, readily available for inspection by the implementing agency; or - in the case of permanent closure, are records required by 40 CFR 280.74 mailed to the implementing agency if not kept on-site or at an alternate site as described above?	YES		
	SUBPART D - RELEASE DETECTION			
40 CFR 280.40 (a)	Are UST systems (new and existing) provided with a method or combination of methods of release detection that: - can detect a release from any portion of the tank and connected underground piping; - is installed, calibrated, operated, and maintained in accordance with the manufacturer's instruction; and - meets the performance requirements of 40 CFR 280.43 or .44; and - after 22 December 1990 (except for methods permanently installed prior to that date), is capable of detecting the leak rate or quantify specified in 40 CFR 280.43(b), (c), or (d), and 40 CFR 280.44 (a) and (b) with a probability of detection of 0.95 and a probability of false alarm of 0.05?	NO	40 CFR 280.40(a) requires that UST systems be provided with a method of release detection. Tanks FBM 61-2, 681-1 and 38-1 do not have methods of release detection.	UST 004
40 CFR 280.41 (a)	Are underground tanks monitored at least every 30 days for releases using one of the methods listed in 40 CFR 280.43(d) through (h)?	NO	40 CFR 280.41(a) requires that tanks be monitored at least every 30 days for releases using methods listed in 40 CFR 280.43. Releases are not monitored every 30 days at tanks FBM 61-2, 681-1 and 38-1.	UST 005
	NOTE: Exceptions include the following: - UST systems that meet the standards of 40 CFR 280.20 or 40 CFR 280.21 and the monthly inventory control			

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REGULATORY CITATION	AUDITOR'S CHECKLIST - UST	Y/N N/A N/R	COMMENTS	FIND #
40 CFR 280.41 (b)	<p>(Continuation)</p> <p>requirements in 40 CFR 280.43(a) or (b), may use tightness testing at least every 5 years until 22 December 1998, or until 10 years after installation or upgrade, whichever is later;</p> <ul style="list-style-type: none"> - UST systems that do not meet the standard of 40 CFR 280.20 and .21 may use monthly inventory controls (40 CFR 280.43(a) and (b)) and annual tank tightness testing until 22 December 1998, at which time the tank must be upgraded or closed; and - tanks with a capacity equal to or less than 550 gallons may use weekly tank gauging per 40 CFR 280.43(b). <p>Is underground piping monitored for releases in accordance with one of the following:</p> <p>(1) PRESSURE PIPING</p> <ul style="list-style-type: none"> - equipped with automatic line leak detection per 40 CFR 280.44(a); and - annual line tightness test per 40 CFR 280.44(b) or monthly monitoring per 40 CFR 280.44(c); <p>(2) SUCTION PIPING</p> <ul style="list-style-type: none"> - line tightness test every 3 years per 40 CFR 280.44(b) or monthly monitoring per 40 CFR 280.44(c)? <p>NOTE: Suction piping is not required to have release detection provided:</p> <ul style="list-style-type: none"> - piping operates at less than atmosphere pressure; - piping is sloped so that contents will drain to the tank if suction is released; - only 1 check valve in each line and check valve is located directly below the suction pump; and - a method is provided to determine compliance with the above requirements. 	YES		
40 CFR 280.42	<p>For all new UST systems (and existing systems by Dec 22, 1998) storing hazardous substances:</p> <ul style="list-style-type: none"> - does the UST meet the requirements for petroleum UST systems (40 CFR 280.41); - is the new UST equipped with secondary containment (i.e., double-walled tank, concrete vault, or lined area surrounding tank); and - is the new UST equipped with a leak detection monitoring device used between the primary and secondary walls? <p>SUBPART E - RELEASE REPORTING, INVESTIGATION, AND CONFIRMATION</p>	N/A		
40 CFR 280.50	<p>For any UST containing petroleum, is a report to the implementing agency made within 24 hours for any of the following conditions:</p> <ul style="list-style-type: none"> - discovery of released regulated substance at the UST site or surrounding area; 	YES		

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40 CFR 280.52	<p>(Continuation)</p> <ul style="list-style-type: none"> - unusual operating conditions such as erratic dispensing equipment behavior, sudden loss of product from UST system; - an unexplained presence of water in the UST system (unless system equipment is found to be defective but not leaking and is repaired or replaced immediately); or - monitoring results from a release detection method indicate that a release may have occurred unless: <ul style="list-style-type: none"> (1) monitoring device is found defective and is immediately repaired or replaced; and (2) in case of inventory control, the second month of data does not confirm initial results? <p>Unless corrective action was initiated per Subpart F, was an investigation begun within 7 days to confirm all suspected releases requiring reporting under 40 CFR 280.50, or was an extension obtained from the implementing agency?</p> <p>NOTE: The following steps are to be used to conduct the investigation (or an alternate approach approved by the implementing agency):</p> <p>(A) SYSTEM TEST - Conduct tightness tests per 40 CFR 280.43(c) and 40 CFR 280.44(b) to determine whether a leak exists in the tank, piping, or both. If the tests indicate a leak exists, the UST system must be repaired, upgraded, or replaced, and corrective action begun per Subpart F. If the tests are negative, further investigation is not required if environmental contamination was not the basis for suspecting a release. A site check must be conducted if the test results are negative but environmental contamination was the basis for suspecting a release.</p> <p>(B) SITE CHECK - The presence of a release must be measured where contamination is most likely to occur. If test results are positive, corrective action must be initiated per Subpart F. If test results within the excavation zone are negative, further investigation is not required.</p>	YES		
40 CFR 280.53 (a)	<p>Are spills or overfills greater than 25 gallons to the environment, or which cause a sheen on a surface water, or for hazardous substances equal or exceeding its reportable quantity under CERCLA (40 CFR 300), contained, immediately cleaned up, corrective action begun per Subpart F, and reported to the implementing agency within 24 hours?</p> <p>NOTE : Release of hazardous substances equal to or exceeding its reportable quantity</p>	YES		

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	(Continuation) must also be reported immediately (rather than within 24 hrs) to the National Response Center. SUBPART F - RELEASE RESPONSE AND CORRECTIVE ACTION			
40 CFR 260.61	Upon confirmation of a release per 40 CFR 280.52, or identification per any other manner, were the following response actions initiated within 24 hours: - release reported to the implementing agency by telephone or electronic mail; - immediate action taken to prevent further release to the environment; and - fire, explosion, and vapor hazards identified and mitigated?	YES		
40 CFR 280.62 (a)	Were the following abatement measures taken after a release occurred: - sufficient product removed from the UST to prevent further release to the environment; - visual inspection of all aboveground releases or exposed belowground releases and prevention of further migration of product into surrounding soil and ground water; - continued monitoring and mitigation of any fire and safety hazards posed by vapors or free product that have migrated from the UST excavation zone and entered subsurface structures; - remediation of hazards posed by contaminated soils excavated or exposed as a result of release confirmation, site investigation, abatement, or corrective action; - measured for the presence of a release where contamination is most likely to be present, unless the presence and source of the release was confirmed during the site check per 40 CFR 280.52(b) or the closure site assessment per 40 CFR 280.72(a); and - investigation to determine the possible presence of free product, and free product removal begun as soon as practicable per 40 CFR 280.64?	YES		
40 CFR 280.62 (b)	Within 20 days after release confirmation, was a report submitted to the implementing agency summarizing the initial abatement measures taken under 40 CFR 280.62(a) and any resulting information or data?	YES		
40 CFR 280.63 (a)	Was the following information, at a minimum, assembled about the site and nature of any release gained while confirming a release or completing the initial statement: - data on the nature and estimated quantity of the release; - data from available sources concerning the following factors: * surrounding populations, * water quality, * use and location of wells potentially	YES		

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	(Continuation) affected by the release, * subsurface soil conditions, and * location of subsurface sources, climatological conditions, and land use; - results of the site check required by 40 CFR 280.62(a)(5); and - results of free product investigations required under 40 CFR 280.62(a)(6) to determine whether free product must be recovered under 40 CFR 280.64?			
40 CFR 280.63 (b)	Within 45 days of a release confirmation, was information required by 40 CFR 280.63(a) submitted to the implementing agency in a manner that demonstrated its applicability and technical adequacy, or in a format and according to a schedule required by the implementing agency?	YES		
40 CFR 280.64	At sites where investigations indicate free product, were the following requirements met: - free product removal conducted in a manner that minimized the spread of contamination into previously uncontaminated zones; - used abatement of free product migration as the minimum objective of the design of the removal system; - flammable products handled in a safe and competent manner to prevent fire or explosion; and - a free product removal report submitted to the implementing agency within 45 days after confirming the release which included the following: * name of person(s) responsible for implementing free product removal, * estimated quantity, type, and thickness of free product observed or measured in wells, bore holes, and excavations, * recovery method used, * location of any discharge on-site or off-site during recovery operation, * type of treatment applied to, and effluent quality expected from, any discharge, * steps taken to obtain any necessary discharge permits, and * disposition of recovered free product?	YES		
40 CFR 280.65 (a)	Were investigations of any release, release site, and surrounding area potentially affected by the release conducted if any of the following conditions existed: - evidence that ground water wells were affected; - free product found to need recovery to meet 40 CFR 280.64; - evidence that contaminated soils may be in contact with ground water; or - requested by the implementing agency, based on the potential effects of contaminated soil and ground water on nearby surface or ground water resources?	YES		
40 CFR 280.65 (b)	Was information required by 40 CFR 280.65(a) submitted as soon as practicable or per schedule	YES		

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	(Continuation) established by the implementing agency?			
40 CFR 280.66 (a)	If a corrective action plan was required by the implementing agency, was the plan submitted according to the schedule and format required by the agency?	YES		
	SUBPART G - OUT-OF-SERVICE AND CLOSURE			
40 CFR 280.70 (a)	Are operation and maintenance of corrosion protection and release detection systems continued when a UST system is temporarily closed? NOTE: Release detection is not required as long as the UST is empty (less than or equal to 2.5 cm of residue or 0.3% by weight of the total capacity of the UST system).	NO	40 CFR 280.70(a) requires operation and maintenance of corrosion protection and release detection systems continued when a UST system is temporarily closed. The monitoring system at building 1346 is not turned on.	UST 006
40 CFR 280.70 (b)	Have the following additional measures been taken when a UST system is temporarily closed for 3 months or more: - vent lines left open and functioning, and - all other lines, pumps, manways, and ancillary equipment capped or secured?	NO	40 CFR 280.70(b) requires that lines, pumps, manways and ancillary equipment of temporarily closed UST systems be secured. The fill line for tank 242 and three UST's at building 1346 are not secured.	UST 007
40 CFR 280.70 (c)	Have UST systems closed for more than 12 months been permanently closed unless they meet the performance standards for new tanks per 40 CFR 280.20 or upgrade requirement of 40 CFR 280.21, except for spill and overfill equipment requirements?	YES		
40 CFR 280.71 (a)	At least 30 days before permanent closure or change in service, was the implementing agency notified, unless such action was in response to corrective action?	YES		
40 CFR 280.71 (b)	Does permanent closure of tanks consist of emptying and cleaning of all product and sludges, and either removal of the tanks from the ground or filling of the tanks with an inert solid material? NOTE: OPNAVINST 5090.1B 16-5.2 requires UST closure by removal except where extenuating circumstances preclude removal. The cost of asphalt or concrete payment overlay removal is not considered extenuating circumstances.	YES		
40 CFR 280.71 (c)	Before a change in service, are tanks emptied and cleaned and a site assessment performed in accordance with 40 CFR 280.72?	N/A		
40 CFR 280.72	Are all tank sites undergoing closure assessed for the presence of contamination prior to completing closure or are one of the external release detection methods allowed in 40 CFR 280.43(e) and (f) operating at the time of closure and indicates no release has occurred?	YES		
40 CFR 280.74	Are closure assessment records maintained for 3 years in accordance with 40 CFR 280.34 by one of the following:	YES		

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FEDERAL REGULATIONS AND POLICY

Auditor: GABE MAGWOOD BEVERLY WASHINGTON

Date: 10/28/96 To 10/31/96

REGULATORY CITATION	AUDITOR'S CHECKLIST - UST	Y/N N/A N/R	COMMENTS	FIND #
	(Continuation) - the owners or operators who took the UST out of service; - the current owners of the UST system site; or - by mailing the closure records to the implementing agency if they cannot be maintained at the closed UST system site?			
OPNAVINST 5090.1B 16-5.3 and 6.4	Has the activity developed a UST Management Plan which contains the following: - listing of all USTs; - regulatory requirement for each UST; and - a plan of action for achieving compliance through monitoring, removal, repair, retrofit, replacement, and remediation of UST systems?	YES		
OPNAVINST 5090.1B 16-6.4	Have Pollution Control Reports (PCRs) been submitted for all compliance-mandated UST projects, regardless of funding source?	YES	All compliance-mandated UST projects have been identified and programed within the base realignment and closure process.	

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Auditor: MICHAEL PATE

Date: 10/28/96 To 10/31/96

REGULATORY CITATION	AUDITOR'S CHECKLIST - WW	Y/N N/A N/R	COMMENTS	FIND #
NPDES PERMIT VERIFICATION				
40 CFR 122.21 (d)(2)	Has NPDES Permit application or reapplication occurred at least 180 days prior to a new discharge or the permit's expiration date?	YES	NPDES Permit #0003816 was reissued in 1995 by DHEC. It has been modified recently to eliminate outfalls where discharge has been discontinued and where commercial tentants have taken over discharge of outfalls.	
40 CFR 122.21 (d)(3)(ii)	Does the NPDES permit reapplication include information required by 40 CFR 501.15(a)(2) on the treatment and disposal of sewage sludge?	N/A		
40 CFR 122.41 (l)(6) and (m)	Is NPDES Permit non-compliance reported orally within 24 hours and in writing within 5 days if required by EPA/State for: - an un-anticipated by-pass which exceeds effluent limitations; and - any upset which exceeds effluent limitations?	YES		
40 CFR 122.41	Is EPA/State notified 10 days prior to an anticipated by-pass which would be for other than necessary maintenance to assure efficient operation?	N/A		
40 CFR 122.21 (a)	Are all wastewater discharges permitted under a valid NPDES/State permit?	YES	NPDES Permit #0003816	
40 CFR 122.41 (l)	Is the information in the NPDES permit application/permit accurate and up-to date, including a description of the: - number and location of wastewater discharges; - treatment facilities; and - treatment processes?	YES		
40 CFR 122.41 (a)	Is the permittee in compliance with effluent limitations and any other permit conditions?	YES		
40 CFR 122.41 (l)	Is the EPA/State notified of planned physical alterations or additions which will result in new, different, or increased wastewater discharges?	YES	DHEC has been notified of the elimination of outfalls and the transfer of outfalls to commercial tentants for incorporation into permit #0003816.	
SELF-MONITORING PROGRAM				
40 CFR 122.41 (e)	Are the primary and secondary wastewater flow measuring device properly installed and maintained?	N/A		
40 CFR 122.41 (e)	Is the calibration frequency of the wastewater flow devices adequate?	N/A		
40 CFR 122.41 (e)	Is the wastewater flow measurement equipment adequate to handle expected ranges of flow rates?	N/A		

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REGULATORY CITATION	AUDITOR'S CHECKLIST - WW	Y/N N/A N/R	COMMENTS	FIND #
40 CFR 122.41 (j)(1)	Are wastewater sampling locations adequate for obtaining representative samples?	YES		
40 CFR 122.41 (j)(1)	Do wastewater testing parameters and sampling frequencies agree with the NPDES Permit requirements?	YES		
40 CFR 122.41 (j)(4)	Is the permittee using methods of wastewater sample collection required by the NPDES Permit?	YES		
40 CFR 122.41 (j)(4)	Do wastewater sample collection procedures include: - refrigeration during compositing; - proper preservation techniques, if required; and - containers and sample holding times in conformance with 40 CFR 136.3?	YES		
40 CFR 122.44 (d)	Does the wastewater treatment plant comply with whole effluent toxicity requirements if required by the permit?	N/A		
40 CFR 117 - and - CWA 307 and 311	Has the activity notified the permit issuing authority of toxic substances which are not limited in the permit if the discharge will exceed the highest of the following "notification levels": (1) 100 mg/l (2) 200 mg/l acrolein and acrylonitrile; 500 mg/l 2,4-dinitrophenol and 2-methyl-4, 6-dinitrophenol and 1 mg/l antimony (3) Five (5) times maximum concentration value for pollutants in the permit. (4) The level established by the Director.	N/A		
40 CFR 122.41 (l)(4)(ii)	If wastewater monitoring and analyses is performed more frequently than required by the NPDES Permit, are the results reported in the permittee's Discharge Monitoring Report (DMR) with the increased frequency indicated?	N/A		
40 CFR 122.41 (j)(3)	Do wastewater sampling records contain the following information: - sampling date, time, and location; - name of the individual collecting the sample; - bottle number; - type of sample; - chain of custody; - analytical methods and technique used; - name of the person performing the analysis; - date and time of analysis; and - results of analysis?	YES		
40 CFR 122.41 (l)(4)(i)	Are analytical results consistent with the data reported on the Discharge Monitoring Reports (DMR)?	YES		
40 CFR 122.41 (j)(2)	Are wastewater monitoring records (e.g. flow, pH, DO, etc.) maintained for a minimum of three (3)	YES		

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	(Continuation) years, including all original strip chart recordings?			
40 CFR 122.41 (j)(2)	Are wastewater laboratory equipment calibration and maintenance records kept for a minimum of three (3) years?	N/A		
40 CFR 122.41 (j)(2)	Are records of sewage sludge monitoring kept for a period of at least five (5) years?	N/A		
40 CFR 122.41 (e)	Are wastewater facility logs kept, including operating records for treatment units?	N/A		
40 CFR 122.41 (e)	Are wastewater laboratory quality assurance records maintained?	N/A		
	OPERATION AND MAINTENANCE	N/A		
40 CFR 122.41 (d)	Is the wastewater treatment plant Operation and Maintenance (O&M) Manual maintained and located at the treatment plant?			
40 CFR 122.41 (e)	Are back-up or auxiliary facilities provided (Note - only required where necessary to maintain compliance)?	N/A		
40 CFR 122.44 (b)(2) - and - 40 CFR 503	Are wastewater sludges and solids adequately disposed of in accordance with all applicable Federal, State, and Local regulations? NOTE: 40 CFR 503 requires pathogen reduction, vector attraction reduction and limits on metals depending on method of disposal (land application, land disposal or incineration).	N/A		
40 CFR 503	Are records being maintained certifying the 40 CFR 503 requirements are being met?	N/A		
40 CFR 122.41 (e)	Is a qualified wastewater treatment plant operating staff provided?	N/A		
40 CFR 122.41 (e)	Are established procedures available for training new wastewater treatment plant operators?	N/A		
40 CFR 122.41 (e)	Is an inventory of wastewater treatment plant spare parts maintained?	N/A		
40 CFR 122.41 (e)	Are files maintained on wastewater treatment plant equipment parts, specifications, and suppliers?	N/A		
40 CFR 122.41 (e)	Is the wastewater treatment plant capable of handling the hydraulic and/or organic loads it receives?	N/A		
40 CFR 122.41 (e)	Is the operation of the following wastewater treatment plant equipment satisfactory, and in compliance with any noted requirements: - equalization facilities; - bar screen; - grinder or comminutor; - grit chamber; - primary sedimentation;	N/A		

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	(Continuation) - trickling filter; - aeration; - secondary sedimentation; - sludge digester; - chlorination * backup chlorine cylinders provided * chlorinators and cylinders housed above ground in special rooms * exhaust fans provided that can be operated from outside the room * heating, and if necessary cooling facility to maintain a temperature above 60 deg F, but below outside summer temperature * suitable gas mask provided immediately outside of chlorinator and cylinder housing * bottle of ammonia provided immediately outside of chlorinator and cylinder housing for leak testing; - dechlorination (if applicable); - final filters; and - sludge dewatering?			
	LABORATORY			
40 CFR 122.41 (j)(4), 136, and 503	Are EPA approved (40 CFR 136) analytical testing procedures used?	N/A	Analytical testing is done by General Engineering Laboratory.	
40 CFR 122.41 (j)(4)	If analytical procedures other than 40 CFR 136 are used to test wastewater discharges, has proper approval been obtained?	N/A		
40 CFR 122.41 (e)	Is satisfactory calibration and maintenance of wastewater laboratory instruments and equipment performed?	N/A		
40 CFR 122.41 (e)	Are quality control procedures used in the wastewater laboratory, including: - duplicate samples; and - spiked samples?	N/A		
40 CFR 122.41 (e)	If required, is the Navy or commercial wastewater laboratory state certified?	YES		
40 CFR 122.41 (j)(4)	Is the proper volumetric glassware used in wastewater analysis, and is the glassware properly cleaned?	N/A		
40 CFR 122.41 (j)(4)	Are laboratory standard reagents and solvents properly stored, frequently checked, and discarded after the recommended shelf life has expired?	N/A		
	COMPLIANCE SCHEDULES			
40 CFR 122.41 (l)(5)	Is the permittee meeting any established compliance schedule?	N/A		
40 CFR 122.41 (l)(5)	Are reports required by any established compliance schedule submitted no later than 14 days following each schedule date?	N/A		
	INDUSTRIAL WASTEWATER MANAGEMENT			
	General	N/A	Charleston NSY/FISC/NS has ceased its industrial activity; therefore, the development of a IWMP is not required.	

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REGULATORY CITATION	AUDITOR'S CHECKLIST - WW	Y/N N/A N/R	COMMENTS	FIND #
OPNAVINST 5090.1B 7-5.1	(Continuation) Has the activity established an Industrial Wastewater Management Plan? NOTE: At a minimum, the plan should consist of waste stream characterization, activity and/or process effluent limitations, pretreatment control measures, a cost effective monitoring program, and a program strategy.			
40 CFR 403.5 (b)	Discharges to Publicly Owned Treatment Works Are the following pollutants prevented from release into a Publicly Owned Treatment Works (POTW): - pollutants which create a fire or explosion hazard; - corrosive pollutants with a pH less than 5.0; - solid or viscous pollutants which obstruct the flow in the POTW; - any pollutants which may interfere with the POTW; - any waste exceeding 40 deg C; - pollutants which may cause presence of toxic gases, fumes, or vapors that may cause acute worker health and safety problems?	YES		
40 CFR 403.5 (a)(1)	Does the activity ensure that no pollutants are discharged to a Publicly Owned Treatment Works (POTW) which would interfere with the treatment process, or pass through the process untreated? NOTE: The terms "interference" and "pass through" are defined in 40 CFR 403.3(i) and 403.3(n), respectively.	YES		
40 CFR 403.6 (b)	Does the activity meet all applicable categorical pretreatment standards? NOTE: Categorical pretreatment standards are pollutant limitations established by EPA for specific industrial subcategories such as the following: electroplating (40 CFR 413) metal finishing (40 CFR 433) metal casting (40 CFR 464) steam electric (40 CFR 423) power plants These standards apply to the effluent of the regulated process (i.e., point source), prior to dilution with other waste streams.	N/A		
40 CFR 403.6 (d)	Where categorical pretreatment standards apply, is dilution prohibited as a substitute for treatment unless expressly authorized by an applicable pretreatment standard or requirement?	N/A		
40 CFR 403.8 (f)	Is the activity in compliance with the Publicly Owned Treatment Works' (POTW's) pretreatment program? NOTE: This includes compliance with discharge	YES	Charleston NSY/FISC/NS sewer discharge is covered under Pretreatment Permit No. 2008 issued by the North Charleston Sewer district. Only one outfall/sampling point remains on this permit.	