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CNC CHARLESTON
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RESPONSE TO SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL
CONTROL COMMENTS REGARDING THE PHASE III FINDING OF SUITABILITY TRANSFER
CNC CHARLESTON SC
05/14/2002
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

Memo

To: Keith Collinsworth, EQC Federal Facilities Liaison
From: Michael Bishop, Hydrogeologist
Date: 14 May 2002
Re: Comments for Charleston Naval Complex Phase III Parcels FOST

Comments for the FOST are as follows:

GENERAL:

Numerous ASTs, USTs, and OWS systems were noted in the Phase III FOST, which have never been investigated for possible contamination. While in some cases the Navy may not be required to perform assessment by regulations or law, it would certainly be to the benefit of the Navy to establish a baseline condition for these systems prior to property transfer. At a minimum, the report should note that these sites have not been investigated and that the Navy has no information concerning possible releases.

Response: The Navy concurs with adding a statement that states what action was taken, if any, at each of these sites whether or not any action was required by law. Most USTs have been investigated under the PST program at CNC and have received SCDHEC concurrence of NFA closure. The OWS included in Phase III have been investigated as part of SWMU and AOC investigations. Where OWS associated with facilities have not been fully investigated as part of a SWMU or AOC, the facilities have been removed from the Phase III transfer.

Many of the reviewer's comments suggest that in the absence of documentation of removal and assessment of USTs and ASTs the Navy must perform an investigation of the site. Through the effort in data collection for the EBST the Navy believes it has conducted a due diligent search by examining records and interviewing facility personnel in order to ascertain the disposition of the USTs/ASTs. It is suspected that most of the USTs/ASTs were removed without documentation. Where no information is available on the location of the former USTs/ASTs, the Navy does not agree that a site assessment is automatically necessary and believes it would be impractical to investigate every area where tanks were used over the 100 year history of the site. Instead, covenants are provided in the FOST and the deed that allow the Navy access to conduct assessment and cleanup in the future should a release be discovered after transfer. The covenants allow the Navy and the regulatory agencies to manage the risk at the site by balancing the probability of exposure to an unknown with the cost of removing any uncertainty. Based on the effort conducted to date the Navy recommends that no additional assessment be conducted for the EDC Phase III parcel.

Many of the site maps included in the report did not reflect the text with regards to tank systems. Please ensure that all tank systems are properly noted on the maps.

Response: Figures will be revised as appropriate.

Any reference to a site receiving an NFA from DHEC should include the exact date (month/date/year) of the NFA.

Response: When available this information is included on the VSI/PSI form. In several cases the project documentation available only indicated the month and year, especially for closures concurred with prior to 1997.

VOLUME I

Facility 13 - Please provide a copy of the DHEC NFA letter for the USTs removed from this site in 12/97. Report indicates that heat is supplied to this structure via a central heat/air unit. This building was constructed in 1906, how was heat initially supplied to the structure?

Response: Facility has been removed from the EDC Phase III transfer.

Facility 14 - SWMU 13 & 136 are noted in the report and the report indicates that no concerns exist with respect to SWMU 13 & 136. No specific information is provided regarding the NFA status of SWMU 13 & 136, please provide this information. Facility 14 is currently tracked by the BOW under ID # 01311, records indicate that this site has not been issued an NFA.

Response: Facility 14 (AOC 659) is currently being monitored under the approve CAP. The text will be revised to include this information.

Facility 20 - A 750 gallon AST was located at this site and removed on an unknown date. The lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. It is recommended that the Navy take samples from the former AST and piping area. The report should be changed to reflect unknown release status of the site.

Response: See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

Facility 28 - Fuel oil ASTs that remain at this facility should be investigated. The Navy needs to conduct sampling around the 2,500 gallon AST associated with Wing 6 due to the reported soil staining in order to determine the extent and severity of the release.

Response : Facility 28 has been removed from the EDC Phase III transfer.

Facility 39-L - The report is unclear as to whether or not sampling has been conducted in the vicinity of Facility 39-L, please clarify.

Response : See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

Facility 39-M - The concerns for 39-M are the same as those for 39-L.

Response: See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

Facility 69 & 69A – The report indicates that a 3K-gallon UST was present during the 1995 EBS and that the tank is no longer at the site. A closure report should exist for this UST. Absent a closure report, the Navy must conduct post closure sampling to ensure that there has not been a release of CoCs to the environment. The ASTs present at this site should also be investigated. Again, the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment.

Response: Facility 69/69A has been excluded from the Phase III transfer pending results of on-going investigations.

Facility 76 & 76A – The report notes that this site used a natural gas heating system. Please confirm that this was the type of system installed when the building was constructed in 1942.

Response: Facility 76/76A has been excluded from the Phase III transfer pending results of on-going investigations.

Facility 89 – The major findings section should be amended to include the UST information noted in the VSI/PSI form. The UST (fuel oil?) was noted at the site in 1986 and closure documentation should be provided to the Department. Absence closure documentation, the Navy should conduct sampling in the area of the former UST to verify that a release has not occurred.

Response: Facility 89 has been excluded from the Phase III transfer pending results of on-going investigations.

Facility 97 - Stained soil on the southwestern side of the facility should be investigated.

Response: Facility 97 has been excluded from the Phase III transfer pending results of on-going investigations.

Facility 98 - Shallow groundwater has been impacted by hydrocarbon contamination in the vicinity of Facility 98. The major findings section should speak fully to the assessment and remediation efforts in the vicinity of Facility 98.

Response: Ongoing investigations have indicated there were impacts to the shallow groundwater. The report will be revised accordingly. This is area 19 of the FDS, an NFA request has been submitted.

Facility 123 – The UST noted to the east of Facility 123 was NFA'd by the Department with the caveat that contamination in the area would continue to be assessed/remediated under the CAP for AST 3909. This UST should be referenced on the site map in the report. The text should fully disclose that remediation efforts associated with AST 3909 will continue to impact the Facility 123 property.

Response: Facility 123 has been removed from EDC Phase III transfer.

Facility 132 – The report notes that a 500-gallon fuel oil UST was installed in 1942 and that the current status of the UST is unknown. Since Facility 132 is designated as AOC 638, Navy should provide information in the report documenting whether or not the site has been sampled for petroleum

hydrocarbon contamination. The Navy should also investigate and document the current status of the tank.

Response: Facility 132 has been removed from the EDC Phase III transfer.

Facility 135 – The Navy must provide documentation concerning the last use date of the reported USTs. Absent this data, Navy must investigate the site to determine the status of the USTs.

Response: See General Comment, covenants will be provided to address the UST corrective action if discovered post transfer.

Facility 191 – The NFA date of record is January 2002, please correct the text.

Response: The text will be corrected as noted.

Facility 196 – The report notes that SWMU 13 is located east of this site and the PST Program is investigating SWMU 13. The report notes that the site (which site?) has been issued an NFA by DHEC. What is the date of the NFA and to which site does it pertain?

Response: The text will be clarified to indicate an NFA for SWMU 13.

Facility 202 & 208 – The text should be changed to reflect that the caretaker's office will remove the UST in 2002.

Response: The text will be corrected as noted.

Facility 203 – References to plans to remove the UST at Facility 208 should be changed to the year 2002.

Response: The text will be corrected as noted.

Facility 204 & 1424 - References to plans to remove the UST at Facility 208 should be changed to the year 2002. The AST should be referenced in the VSI/PSI Form. How were the pumps powered? Did they have a backup generator?

Response: The text will be corrected as noted. Since the facility is inactive and the pumps not used, reporting on the power supply to the pumps will not impact the environmental condition of the property. As noted there is electricity supplied to the facility. No evidence of a backup generator was noted during the VSI/PSI and none was referenced in the available records reviewed.

Facility 235 – Based upon the VSI/PSI Form, various ASTs were located at this facility. The text should be corrected to note these ASTs and what, if any, assessment was performed. The map should note the ASTs.

Response: Facility 235 has been removed from the EDC Phase III transfer.

Facility 451-K – The text should indicate that UST 123 was NFA'd by the Department with the caveat that contamination in the area would continue to be assessed/remediated under the CAP for AST 3909.

Response: The major findings for this facility indicate the property has been impacted by petroleum products from FDS Area #1 and nearby Facility 3909 and that monitored natural attenuation is on-going.

Facility 640 - A 1000-gallon fuel oil AST is located at this site. The lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. It is recommended that the Navy take samples from the former AST and piping area. Report should be changed to reflect unknown release status of the site.

Response: See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

Facility 644 - A 2500-gallon fuel oil AST is located at this site. The lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. It is recommended that the Navy take samples from the former AST and piping area. Report should be changed to reflect unknown release status of the site.

Response: See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

Facility 653 – The Navy should more fully explain the AST reported at the site. Explanation should include details concerning what records indicate the presence of the AST and the possible location. The report should also note the unknown status of any release from this AST.

Response:

Facility 653 (DHEC No: 00962) currently has a NFA received on 1-30-02.

Facility 654 – The Report should document the size of the AST and note any actions taken to assess if a release has occurred.

Response: See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

Facility 655 - A 200 gallon fuel oil AST is located at this site. The lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. It is recommended that the Navy take samples from the former AST and piping area. The report should be changed to reflect unknown release status of the site. The report should also note this AST on the map.

Response: See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

Facility 656 – The petroleum contamination at this site is under the oversight of the RCRA program under the AOC 655 investigation.

Response: Facility 656 (AOC 655): Currently has an NFA dated 6-21-99 .

Facility 657 – The map should note the removed UST.

Response: If data is available concerning the former location, the figure will be revised to show the removed UST.

VOLUME II

Facility 680 – The Navy should consider investigation of the OWS associated with this facility for possible contamination. The UST & AST information in the report needs to be corrected to reflect the information in the VSI/PSI form. Also, the Navy should provide justification for not investigating the ASTs/UST for contamination. The site map should be corrected to note the ASTs & UST.

Response: Facility 680 has been excluded from the Phase III transfer pending results of on-going investigations.

Facility 686 – Based on Departmental records, Facility 686 (DHEC ID # 01164) has not been issued an NFA. A fuel oil AST is located at this site; the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. It is recommended that the Navy take samples from the former AST and piping area. The report should be changed to reflect unknown release status of the site. The map should be corrected to note the AST/UST locations.

Response: See General Comment, covenants will be provided to address the UST corrective action if discovered post transfer.

Facility 687 – The removed UST noted on the map needs to be documented in the report. Was this UST associated with 687 or NS 26?

Response: Facility 687 has been removed from the EDC Phase III transfer.

Facility 760 & 1413 – The map should be corrected to note the AST/UST locations.

Response: If data is available concerning the former location, the figure will be revised to show the removed UST.

Facility 761 NH-C & 1414 - A fuel oil AST is located at this site, the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. It is recommended that the Navy take samples from the former AST and piping area. The report should be changed to reflect unknown release status of the site. The map should be corrected to note the AST/UST locations.

Response: See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

Facility 807 – The map should be corrected to note the AST/UST locations.

Response: If data is available concerning the former location, the figure will be revised to show the removed UST.

Facility 851 – The map should be corrected to note the AST/UST locations.

Response: If data is available concerning the former location, the figure will be revised to show the removed UST.

Facility 1035 –Based on the early uses of this building, it would appear that some form of heating and cooling would have been installed. Please clarify the heating and cooling equipment that might have existed at this site between 1919 and present.

Response: Facility 1035 has been removed from the EDC Phase III transfer.

Facility 1143 – The VSI/PSI form indicates that heating and cooling was not supplied to this facility. The property description indicates that the building was used as a barracks, Navy Exchange, and MWR offices. Please clarify the heating and cooling situation at this site.

Response: The facility was demolished prior to the 2001 survey. The records indicate that heating was from an adjacent boiler prior to 1979 and provided by the public works department through steam lines after that. Cooling was by a central A/C unit and window units. The VSI/PSI form will be revised appropriately.

Facility 1171 – The 15-gallon AST should be noted on the site map. The Navy should provide justification for not investigating any possible releases from the AST.

Response: Fifteen gallon AST are considered portable equipment associated with the facility, and therefore does not warrant locating on the map. Facility 1171 has been removed from the EDC Phase III transfer.

Facility 1173 – How was/is heat supplied to this building?

Response: Facility 1173 has been removed from the EDC Phase III transfer.

Facility 1193 – How was fuel supplied to the boiler at this site?

Response: There were no indications of a UST present on the property (no fill or vent piping) and Navy fuel oil use records from the 1990's did not indicate fuel oil was being delivered to this facility.

Facility 1197 – The construction date of this building make it unlikely that a central unit supplied HVAC at time of construction. Please indicate the type of HVAC system present at this site in 1943.

Response: Although the facility has been extensively remodeled, there were no indications in the available records reviewed or visible observations that the facility was heated with a boiler unit. Without records to support if and how the facility was heated in the past, the EBST will not speculate on the issue. No further investigation of this facility will be performed.

Facility 1226 – The AST should be noted on the site map.

Response: The AST storing kerosene had been removed prior to the 2001 survey and is no longer at the facility, therefore no changes to the site map are required.

Facility 1265 – The use of this building as administrative offices makes it highly unlikely that the building was not heated or cooled. Please provide information as to the nature of the HVAC system(s) at this site.

Response: As noted there was no evidence of heating and cooling identified during the 2001 survey. The original cinder block walls and roof appeared to be intact. Similar structures at the CNC were typically heated with electric space heaters, however, since no information was available in the records, speculation on the type of heating and cooling will not be included in the EBST.

Facility 1302 – Please provide information concerning the NFA date for this site.

Response: The NFA letter for SWMU 13 has been provided under separate correspondence.
Facility 1306 – Please provide information concerning the current status of the release investigation at this site.

Response: The NFA letter for SWMU 13 has been provided under separate correspondence.
Facility 1313 - Please provide information concerning the NFA date for this site. The VSI-PSI form indicates that the 1k-gallon UST was a backup for an AST. Please provide information concerning the AST and note it in the report text.

Response: The AST and UST have both been removed. Information concerning the AST was not present in the reviewed documentation readily available. An environmental assessment is not required for the AST to transfer the property if there is no evidence or documentation of a release. During the VSI/PSI no evidence of a release was identified. There was no staining or stressed vegetation in the area and no spill reports found.

Facility 1346 – Please update the site map to reflect the AST/UST status at the site. Also, please indicate if any assessment has been performed on the 3 10K gallon ASTs at the site.

Response: The site map will be updated to indicate the present or former location of all USTs and ASTs. The three, 10,000 gallon ASTs are currently inactive. See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

Facility 1433 – As this building was used for offices, it is unlikely that it was not heated or cooled. Please provide information concerning the historical HVAC status at this site.

Response: Facility 1433 has been excluded from the Phase III transfer pending results of on-going investigations.

Facility 1646 – Please indicate what, if any, assessment has been performed for the former AST located at this site. Please indicate the removed AST on the site map.

Response: If data is available concerning the former location, the figure will be revised to show the removed AST. An environmental assessment is not required for the AST to transfer the property if there is no evidence or documentation of a release. During the VSI/PSI no evidence of a release was identified. There was no staining or stressed vegetation in the area and no spill reports found.

Facility 1653 – Please indicate what, if any, assessment has been performed for the OWS located at this site. Please indicate the AST on the site map.

Response: The location of the AST will be added to the site map. The OWS was investigated as part of the investigation associated with the FDS system, particularly areas 15, 19

Facility 1708 - A fuel oil AST is located at this site, the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. It is recommended that the Navy take samples from the AST and piping area.

Response: See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

VOLUME III

Facility 1829 – The site map indicates that there was a UST removed between facility 1829 & Supply Street. Please clarify as the text does not mention this UST.

Response: Facility 1829 has been excluded from the Phase III transfer pending results of on-going investigations.

Facility 1889 - A fuel oil AST is located at this site, the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. It is recommend that the Navy take samples from the AST and piping area.

Response: See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

Facility 3900-E & F - Diesel fuel ASTs are located at these sites, the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. As the other bulk fuel ASTs in this area have exhibited problems, Navy should sample in the vicinity of 3900-E & F to ensure compliance with groundwater and soil standards.

Response: See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

Facility 3909 - The UST noted at Facility 123 was NFA'd by the Department with the caveat that contamination in the area would continue to be assessed/remediated under the CAP for AST 3909. This UST should be referenced on the site map in the report. The text should fully disclose that remediation efforts associated with AST 3909 will continue to impact the Facility 123 property.

Response: Facility 123 text so indicates AST 3909 impacted Facility 123. The UST is shown on the site map for Facility 123 and Figures 3- through 3-11.

Facility 3915 – The report notes that Tank 39-J used to occupy this site, and that 39-J developed a leak in 1955 and was replaced by 3915. As a release has been reported at this site, the Navy should assess the soil and groundwater for contamination.

Response: Facility 3915 has been removed from the EDC Phase III transfer.

Facility M-192 – This facility was constructed in 1959 for year round use, please confirm that heat has never been supplied to this structure via a fuel oil boiler.

Response: The facility was originally constructed as an indoor firing range and small arms armory, therefore it would not have been constructed with an open flame boiler. The records did not indicate when the facility use was switched to administrative. The records did not indicate a boiler was added for this change in use. There were no visual indications of a boiler having been present at the facility observed during the 2001 VSI/PSI.

Facility M-1257 – This facility was a field office, please confirm that heat has never been supplied to this structure via a fuel oil boiler.

Response: . This facility was previously transferred in Phase II.

Facility NH-16 – Please provide information concerning the ongoing monitoring at this site as the Department could not locate records indicating such monitoring.

Response: The text is in error in reference to ongoing monitoring at facility NH16. The text will be revised accordingly.

Facility NH – 47,48,49,50,51,52,53,54 – It is reported that these structures are heated/cooled by a central unit. Is the central unit electrically or fuel powered? Given the age of the structure has heat ever been provided by a fuel oil boiler (as indicated in the VSI/PSI form for facility NH-50)? If a fuel oil fired boiler was used at these sites, please provide information concerning the assessment of the fuel UST/AST.

Response: The facilities referred to are all part of the former Naval Hospital. The entire complex was originally heated from Facility NH-46. The individual wings did not have separate boilers.

Facility NH-50 – Has the 150-gallon AST been assessed? Please indicate the AST on the site map.

Response: The VSI/PSI form and figure will be revised to indicate the former location of the AST. An environmental assessment is not required for the AST to transfer the property if there is no evidence or documentation of a release. During the VSI/PSI no evidence of a release was identified. There was no staining or stressed vegetation in the area and no spill reports found.

Facility NS-1 – Due to the nature of this structure, it is likely that it was heated/cooled. Please provide historical information concerning the method of HVAC.

Response: The historic method of HVAC was not confirmed during the 2001 survey due to construction activities at the facility. Indications were the facility was originally supplied with Steam heat from NS-2, a central boiler facility to supply steam heat for the area.. Facility NS-1: There is one former tank location just to the north of this Building. Steam lines are located overhead.

Facility NS-2 – The UST should be noted on the site map.

Response: The UST location will be shown on the site map.

Facility NS-16 - A fuel oil AST is located at this site, the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. It is recommended that the Navy take samples from the AST and piping area.

Response: The AST is a dual walled installation. An environmental assessment is not required for the AST to transfer the property if there is no evidence or documentation of a release. During the VSI/PSI no evidence of a release was identified. There was no staining or stressed vegetation in the area and no spill reports found. See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

Facility NS-44 – On 14 October 1997 the Department authorized the Navy to conduct additional sampling in the vicinity of UST NS-44A. To date the Department has not received the results of this sampling. The Navy must submit additional sampling results in order for the Department to evaluate this site. A fuel oil AST is located at this site, the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. It is recommended that the Navy take samples from the AST and piping area.

Response: Results of the AOC 666 site investigation have been submitted under separate correspondence. The Navy recommends No Further Action for the UST sites as well as AOC 666.

Facility NS-53 – The USTs should be noted on the site map.

Response: The UST location will be shown on the site map.

Facility NS-69 – A fuel oil AST is located at this site, the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. It is recommended that the Navy take samples from the AST and piping area.

Response: See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

Facility NS-79 – The UST and AST should be noted on the site map.

Response: The UST and AST locations will be shown on the site map.

Facility NS-84 - A fuel oil AST is located at this site, the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. It is recommended that the Navy take samples from the AST and piping area.

Response: See General Comment, covenants will be provided to address the AST corrective action if discovered post transfer.

Facility X-10 – please confirm that no POLs were used or POL waste generated at this site. Site map indicates that a UST was removed west of X-10, please identify this UST.

Response: The documents indicate that since base closure no POL products or POL wastes are present or associated with the facility. The document does indicate POL products were historically present and the facility categorized as a 2. No changes are required.

Facility X-11 – Since this facility was used as office space, some form of heat was most likely provided during the buildings existence. Please provide information specifying how the building was heated.

Response: The facility has been demolished and there were no indications in the available records reviewed or visible observations that the facility was heated with a boiler unit. Without records to support if and how the facility was heated in the past, the EBST will not speculate on the issue. No further investigation of this facility will be performed.

Facility X-12 – Please indicate that facility X-12 is currently being investigated by the PST Program.

Response: The OWS associated with a former washrack, south of X-12 is still under investigation by the PST program. The OWS is not associated with this facility. The area associated with the OWS is not included in the Phase III transfer. Therefore, no changes to the text will be made.

Facility X-54 – Given the age of this structure it is unlikely that the building had a central HVAC unit when constructed. Please provide information indicated if a fuel oil boiler ever heated this structure.

Response: Available records indicate the facility did have a boiler unit. An AST associated with this facility was removed. There were no records of a UST present or removal of an UST. The VSI?PSI and summary will be changed to include this information.



**Water Monitoring, Assessment & Protection Division
Groundwater Quality Section**

Phone (803) 898-3553 Fax (803) 898-3795

Memo

To: Keith Collinsworth, EQC Federal Facilities Liaison
From: Michael Bishop, Hydrogeologist
Date: 5/28/2002
Re: Comments for Charleston Naval Complex Phase III Parcels FOST

Comments for FOST are as follows:

VOLUME I

UST 643B
Facility 13 - Please provide a copy of the DHEC NFA letter for the USTs removed from this site 2/97. Report indicates that heat is supplied to this structure via a central heat/air unit. This building was constructed in 1906, how was heat initially supplied to the structure?

Facility 14 - SWMU 13 & 136 are noted in the report and the report indicates that no concerns exists with respect to SWMU 13 & 136. No specific information is provided regarding the NFA status of SWMU 13 & 136, please provide this information. Facility 14 is currently tracked by the BOW under ID # 01311, records indicate that this site has not been issued an NFA.

Facility 20 - A 750 gallon AST was located at this site and removed on an unknown date. The lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. Recommend that the Navy take samples from the former AST and piping area. Report should be changed to reflect unknown release status of the site.

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Facility 39-L - the report is unclear as to whether or not sampling has been conducted in the vicinity of Facility 39-L, please clarify.

Facility 39-M - the concerns for 39-M are the same as those for 39-L.

~~**Facility 69 & 69A** - report indicates that a 3K-gallon UST was present during the 1995 EBS and that the tank is no longer at the site. A closure report should exist for this UST. Absent a closure report, the Navy must conduct post closure sampling to ensure that there has not been a release of CoCs to the environment. The ASTs present at this site~~

should also be investigated. Again, the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment.

- X **Facility 76 & 76A** – the report notes that this site used a natural gas heating system. Please confirm that this was the type of system installed when the building was constructed in 1942.
- X **Facility 89** – The major findings section should be amended to include the UST information noted in the VSI/PSI form. The UST (fuel oil?) was noted at the site in 1986 and closure documentation should be provided to the Department. Absence closure documentation, the Navy should conduct sampling in the area of the former UST to verify that a release has not occurred.
- X **Facility 97** - Stained soil on the southwestern side of the facility should be investigated.
- ✓ **Facility 98** - Shallow groundwater has been impacted by hydrocarbon contamination in the vicinity of Facility 98. The major findings section should speak fully to the assessment and remediation efforts in the vicinity of Facility 98.
- ✓ **Facility 123** – The UST noted to the East of Facility 123 was NFA'd by the Department with the caveat that contamination in the area would continue to be assessed/remediated under the CAP for AST 3909. This UST should be referenced on the site map in the report. The text should fully disclose that remediation efforts associates with AST 3909 will continue to impact the Facility 123 property.
- ✓ **Facility 132** – Report notes that a 500-gallon fuel oil UST was installed in 1942 and the current status of the UST is unknown. Since Facility 132 is designated as AOC 638, Navy should provide information in the report documenting whether or not the site has been sampled for petroleum hydrocarbon contamination. The Navy should also investigate the current status of the tank.
- ✓ **Facility 135** – Navy must provide documentation concerning the last use date of the reported USTs. Absent this data, Navy must investigate the site to determine the status of the USTs.
- ✓ **Facility 191** – NFA date of record is January 2002, please correct text.
- ✓ **Facility 196** – report notes that SWMU 13 is located east of this site and the PST Program is investigating SWMU 13. Report than notes that the site (which site?) has been issued an NFA by DHEC. What is the date of the NFA and which site to which site does it pertain?
- ~ **Facility 202 & 208** – text should be changed to reflect that the caretaker's office will remove the UST in 2002.
- ✓ **Facility 203** – references to plans to remove the UST at Facility 208 should be changed to the year 2002.
- ✓ **Facility 204 & 1424** - references to plans to remove the UST at Facility 208 should be changed to the year 2002. AST should be referenced in the VSI/PSI Form. How were the pumps powered? Did they have a backup generator?
- X **Facility 235** – Based upon the VSI/PSI Form, various ASTs were located at this facility. Text should be corrected to note these USTs and what, if any, assessment was performed.
- ✓ **Facility 451-K** - UST 123 was NFA'd by the Department with the caveat that contamination in the area would continue to be assessed/remediated under the CAP for AST 3909. The text should fully disclose that remediation efforts associates with AST 3909 will continue to impact the Facility 123 property.
- ✓ **Facility 640** - A 1000-gallon fuel oil AST is located at this site. The lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. Recommend that the Navy take samples from the former AST and piping area. Report should be changed to reflect unknown release status of the site.

✓ **Facility 644** - A 2500-gallon fuel oil AST is located at this site. The lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. Recommend that the Navy take samples from the former AST and piping area. Report should be changed to reflect unknown release status of the site.

✓ **Facility 653** - Navy should more fully explain the AST reported at the site. Explanation should include details concerning what records indicate the presence of the AST and the possible location. Report should also note the unknown status of any release from this AST.

✓ **Facility 654** - Report should document the size of the AST and note any actions taken to assess if a release has occurred.

✓ **Facility 655** - A 200 gallon fuel oil AST is located at this site. The lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. Recommend that the Navy take samples from the former AST and piping area. Report should be changed to reflect unknown release status of the site. Report should also note this AST on the map.

✓ **Facility 656** - the petroleum contamination at this site is under the oversight of the RCRA program under the AOC 655 investigation.

✓ **Facility 657** - map should note the removed UST.

VOLUME II

X **Facility 680** - The Navy should consider investigation of the OWS associated with this facility for possible contamination. The UST & AST information in the report needs to be corrected to reflect the information in the VSI/PSI form. Also, the Navy should provide justification for not investigating the ASTs/UST for contamination. The site map should be corrected to note the ASTs & UST.

Facility 686 - Based on Departmental records, Facility 686 (DHEC ID # 01164) has not been issued an NFA. A fuel oil AST is located at this site; the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. Recommend that the Navy take samples from the former AST and piping area. Report should be changed to reflect unknown release status of the site. Map should be corrected to note the AST/UST locations.

Facility 687 - ~~The~~ removed UST noted on the map needs to be documented in the report. Was this UST associated with 687 or NS 26?

Facility 760 & 1413 - Map should be corrected to note the AST/UST locations.

Facility 761 NH-C & 1414 - A fuel oil AST is located at this site, the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. Recommend that the Navy take samples from the former AST and piping area. Report should be changed to reflect unknown release status of the site. Map should be corrected to note the AST/UST locations.

Facility 807 - Map should be corrected to note the AST/UST locations.

Facility 851 - Map should be corrected to note the AST/UST locations.

Facility 1035 - Based on the early uses of this building it would appear that some form of heating and cooling would have been installed. Please clarify the heating and cooling situation that might have existed at this site between 1919 and present.

Facility 1143 - The VSI/PSI form indicates that heating and cooling was not supplied to this facility. The property description indicates that the building was used as a barracks, Navy Exchange, and MWR offices. Please clarify the heating and cooling situation at this site.

Facility 1171 - The 15-gallon AST should be noted on the site map. The Navy should provide justification for not investigating any possible releases from the AST.

Facility 1173 - How was/is heat supplied to this building?

Facility 1193 - How was fuel supplied to the boiler at this site?

Facility 1197 - The construction date of this building make it unlikely that a central unit supplied HVAC at time of construction. Please indicate the type of HVAC system present at this site in 1943.

Facility 1226 - The AST should be noted on the site map.

Facility 1265 - the use of this building as administrative offices makes it highly unlikely that the building was not heated or cooled. Please provide information as to the nature of the HVAC system(s) at this site.

Facility 1302 - Please provide information concerning the NFA date for this site. *SWMU 13*

Facility 1306 - please provide information concerning the current status of the release investigation at this site.

Facility 1313 - Please provide information concerning the NFA date for this site. The VSI-PSI form indicates that the 1k-gallon UST was a backup for an AST. Please provide information concerning the AST and note it in the report text.

Facility 1346 - Please update the site map to reflect the AST/UST status at the site. Also, please indicate if any assessment has been performed on the 3 10K gallon ASTs at the site.

Facility 1433 - as this building was used for offices it is unlikely that it was not heated or cooled. Please provide information concerning the historical HVAC status at this site.

Facility 1646 - Please indicate what, if any, assessment has been performed for the former AST located at this site. Please indicate the removed AST on the site map.

Facility 1653 - Please indicate what, if any, assessment has been performed for the OWS *SWMU 15, 19* located at this site. Please indicate the AST on the site map.

Facility 1708 - A fuel oil AST is located at this site, the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. Recommend that the Navy take samples from the former AST and piping area.

VOLUME III



Facility 1829 – The site map indicates that there was a UST removed between facility 1829 & Supply Street. Please clarify as the text does not mention this UST.

Facility 1889 – A fuel oil AST is located at this site, the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. Recommend that the Navy take samples from the former AST and piping area.

2600 Bull Street
Columbia, SC 29201-1708

Facility 3900-E & F - Diesel fuel ASTs are located at these sites, the lack of stressed vegetation or stained soils does not conclusively establish that there has not been a release of contaminants to the environment. Indeed, releases may often be associated with underground components such as piping. As the other bulk fuel ASTs in this area have exhibited problems, Navy should sample in the vicinity of 3900-E & F to ensure compliance with groundwater and soil standards.

Facility 3909 - The UST noted at Facility 123 was NFA'd by the Department with the caveat that contamination in the area would continue to be assessed/remediated under the CAP for AST 3909. This UST should be referenced on the site map in the report. The text should fully disclose that remediation efforts associated with AST 3909 will continue to impact the Facility 123 property.

Facility 3915 – Report notes that Tank 39-J used to occupy this site and that 39-J developed a leak in 1955 and was replaced by 3915. As a release has been reported at this site the Navy should assess the soil and groundwater for contamination.

Facility M-192 – this facility was constructed in 1959 for year round use, please confirm that heat has never been supplied to this structure via a fuel oil boiler.

Facility M-1257 – This facility was a field office, please confirm that heat has never been supplied to this structure via a fuel oil boiler.

Facility NH-16 – Please provide information concerning the ongoing monitoring at this site as the Department could not locate records indicating such monitoring.

Facility NH – 47,48,49,50,51,52,53,54 – It is reported that these structures are heated/cooled by a central unit. Is the central unit eclectically or fuel powered? Given the age of the structure has heat ever been provided by a fuel oil boiler?



**Water Monitoring, Assessment & Protection Division
Groundwater Quality Section**

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Chairman **Memo**

Mark B. Kent
Vice Chairman

Howard L. Brilliant, MD
Secretary

Carl L. Brazell

Louisiana W. Wright

L. Michael Blackmon

To: Keith Collinsworth, EQC Federal Facilities Liaison

From: Michael Bishop, Hydrogeologist

Date: 6/5/2002

Re: Response to Navy's Response to the Comments for Charleston Naval Complex Phase III Parcels FOST

Larry R. Chewning, Jr., DMD

RED font indicates an active contamination project – GREEN font indicates a site that either has an AST and/or UST present or had one that was removed but where no assessment activities (other than visual inspections) took place.

Comments for FOST are as follows:

VOLUME I

Facility 14 – Site currently has a CAP stipulating MNA. *Removed?*

Facility 20 - AST Removed from the site (unknown date) – not investigated.

Facility 39-L – AST not investigated. ~~NOT LISTED ON TONY'S REVISED FOST AND NOT EXCLUDED?~~

Facility 39-M – AST not investigated.

Facility 98 – Site currently in assessment with NFA request submitted by the Navy.

Removed Facility 123 – In the Navy's response to my comments Facility 123 is "removed" from the Phase III Transfer. However, it is still listed on the main transfer document. Facility 123 should be removed.

Facility 132 – In the Navy's response to my comments Facility 132 is "removed" from the Phase III Transfer. However, it is still listed on the main transfer document. Facility 132 should be removed.

Facility 135 – UST not investigated.

Facility 202 & 208 – UST not investigated – slated for removal in 2002.

Facility 203 – UST not investigated – slated for removal in 2002.

Facility 451-K – This property is impacted by the release from AST 3909. !

Facility 640 – AST not investigated.

Facility 601 01537

D H E C



Facility 044 - AST not investigated.

Facility 054 - The NFA referenced by the Navy was for the UST located at this site. The AST reported (removed) at this facility has never been investigated.

PROMOTE PROTECT PROSPER
Facility 054 - AST not investigated.

2600 Bull Street
Columbia, SC 29201-1708
Facility 055 - AST not investigated.

COMMISSIONER VOLUME II C. Earl Hunter

BOARD: Facility 686 - Facility 686 (DHEC ID # 01164) has not been issued an NFA. AST at site not investigated. ←
Bradford W. Wyche
Chairman
Facility 761 NH-C & 1414 - AST not investigated.

Mark B. Kent
Vice Chairman
Facility 1193 - The FOST notes a boiler at this facility - The Navy has failed to identify how fuel was supplied to this facility.
Howard L. Brilliant, M.D.
Secretary

Carl L. Brazell Facility 1197 - Please indicate what "available records were reviewed for this facility. Do the Navy's fuel oil records indicate that fuel was delivered to this BLDG?" ←
Louisiana W. Wright

L. Michael Blackmon Facility 1226 - The removed AST should be noted on the site map.
Larry R. Chewning, Jr., DMD

Facility 1313 - AST not investigated.

Facility 1346 - AST not investigated.

Facility 1646 - AST not investigated.

Facility 1708 - AST not investigated.

VOLUME III

Facility 1889 - AST not investigated.

Facility 3900-E & F - AST not investigated.

Facility 3909 - Active contamination project. *Removed?*

Facility NH-50 - AST not investigated.

Facility NS-16 - AST not investigated.

→ Facility NS-44 - Active project - Department is reviewing the information submitted under the AOC 666 investigation to determine if it is sufficient to close NS-44.

Facility NS-69 - AST not investigated.

Facility NS-84 - AST not investigated.

Facility X-12 - Active project.

Facility X-54 - AST not investigated.