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WETLAND DELINEATION REPORT APPROXIMATE 1.6 ACRE PARCEL AREA OF
CONCERN 721 CNC CHARLESTON SC
9/1/2004
ENSAFE INC.

WETLAND DELINEATION REPORT

**Approximate 1.6-Acre Parcel
Charleston Naval Complex – AOC 721
Charleston, South Carolina**

Prepared for:



**SOUTHNAVFACENGCOM
2155 Eagle Drive
North Charleston, South Carolina 39418**

Prepared by:



**313 Wingo Way
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September 2004

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1.0 INTRODUCTION

EnSafe Inc. (EnSafe) prepared this report on behalf of the Southern Division (SouthDiv) of the Naval Facilities Engineering Command (NAVFAC) to identify potential waters of the United States at the Charleston Naval Complex (CNC) in Charleston, South Carolina. The focus of this report is an approximate 1.6-acre parcel of the CNC referred to as Area of Concern 721 (AOC 721) (Figure 1-1) AOC 721 is located west of Avenue D and south of Noisette Creek in Charleston, Charleston County, South Carolina - 32° 52.357' N Latitude, 79° 58.445' W Longitude (Figure 1-2). The purpose of this wetland delineation is to determine if excavation activities under consideration lie within waters of the United States under the jurisdiction of the United States Army Corps of Engineers (USACE). A site visit was made by Alex Bartos and Gary Benfield of EnSafe on July 8, 2004 to conduct the wetland delineation. On September 1, 2004 Fred Mallet of South Carolina Department of Health and Environmental Control, Division of Ocean Coastal Resource Management, met Mr. Benfield and Chad Tripp and confirmed EnSafe's delineation determination.

The findings of this report are based on information gathered during the site visit, research, and understanding of the USACE 1987 Wetlands Delineation Manual (Y-87-1). This report is subject to jurisdictional determination review by the USACE and OCRM.

1.1 Site Description

AOC 721 is approximately 1.6 acres and is located west of Avenue D North, and just south of Noisette Creek. AOC 721 includes a 650 foot long drainage ditch on the western side and runs northeast along a perimeter road and discharges into Noisette Creek. AOC 721 widens significantly prior to its discharge point into Noisette Creek. According to the Charleston quadrangle USGS 7.5 minute series topographic map, this portion of AOC 721 rises in elevation from 1.5 feet above mean sea level (msl) to 8 feet above msl. AOC 721 is densely vegetated with mostly shrub and herb layer species.

A small pond is located immediately east of the drainage ditch and is encompassed partially by the AOC 721 boundary. During times of heavy rainfall the pond overflows and empties into the drainage ditch. A larger pond is adjacent to AOC 721 to the southeast. Both ponds are a result of coal pile removal actions conducted in 1996 leaving depressions in the topography.

A review of historical aerial photographs indicates the entire area to the east-southeast of AOC 721 was used to store coal (Appendix A – Photographs).

1.2 Project Background

Initial sampling events were conducted between 1981 and 1985 which identified metals and suspended solids in surface water and storm water runoff samples leading to AOC 721. A RCRA Facility Assessment (RFA) to evaluate the coal storage facility was conducted in 1995. Findings of the 1981 and 1985 sampling events and the RFA led to a RCRA Facility Investigation (RFI) and Corrective Measures Study (CMS) of Solid Waste Management Unit (SWMU) 44 from 1995 to 2002. The RFI identified COC affected soils in the area now known as AOC 721. The coal pile storage located to east-southeast of AOC 721 acted as a source of contamination to the soil. This pre-existing coal pile and related surface soils were removed in a cleanup effort in 1996. During RFI activities at AOC 721, it was observed that COPCs were present in sediments at levels exceeding risk based screening numbers.



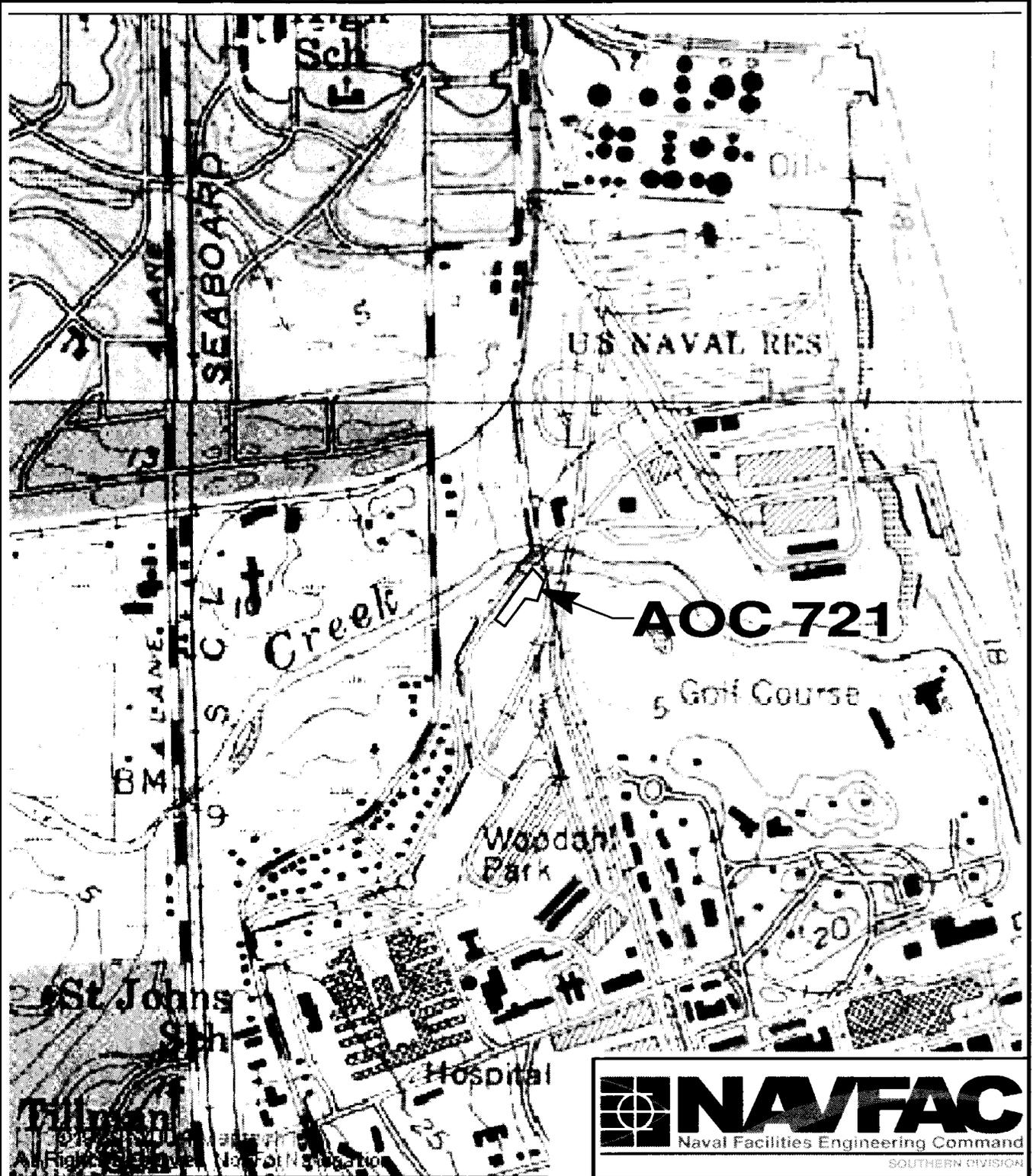
0 50 100 150 200 Feet

LEGEND	
	Ditch Drainage
	Small Pond
	1996 Removal - North Pond
	AOC 721 RFI Boundary



Figure 1-1
AOC 721 Site Features Map

AOC 721
Wetland Delineation Report
Charleston Naval Complex
Charleston, South Carolina



AOC 721
 WETLAND DELINEATION
 REPORT
 CHARLESTON NAVAL COMPLEX
 CHARLESTON, SC

FIGURE 1-2
 TOPOGRAPHIC MAP
 AOC 721

Date: 07/23/04

DWG Name: 0164C013

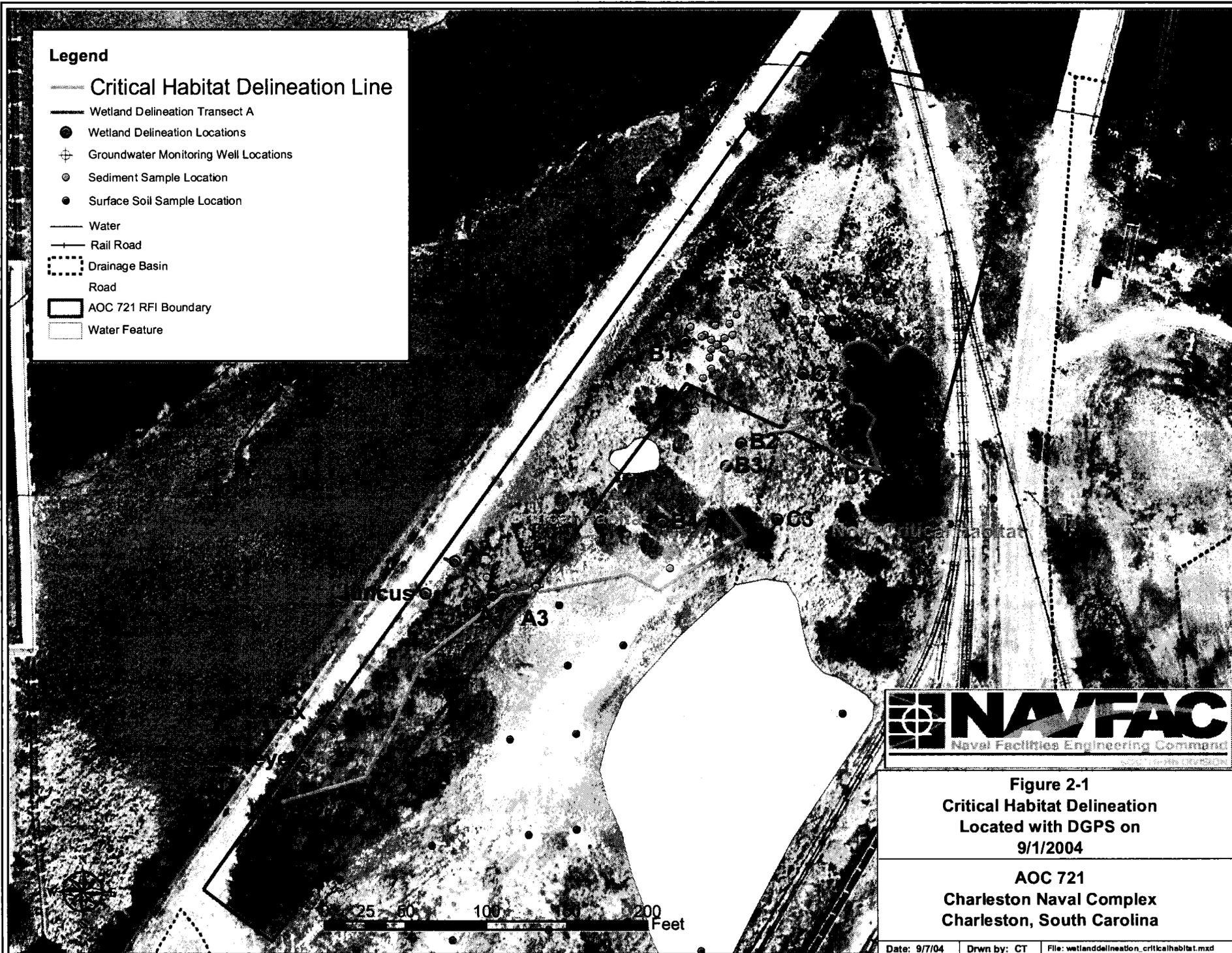
2.0 METHODOLOGY

Determination and delineation of wetland areas within the project area were based on review of soil, vegetative, and hydrologic data, and a thorough on-site investigation on July 8, 2004. The delineation process used standard methodologies for routine determinations as described in the 1987 Corps Wetland Delineation Manual. Three transects (Transect A, B and C) were made along AOC 721 traversing the length of the AOC 721. Transects were surveyed using a Trimble Pathfinder Pro XRS Differential Global Positioning System (DGPS) Receiver and Data Collector capable of sub-meter accuracy. Coordinates were post-processed to increase accuracy. The critical habitat delineation of wetland boundaries and other water habitat areas are shown on Figure 2-1. The Routine Wetland Determination Data Forms are included in Appendix B.

2.1 Soil Conditions

A United States Department of Agriculture Soil Conservation Service Soil Survey of Charleston County, South Carolina was not readily available during the site visit and was not likely to be accurate for AOC 721. Historical aerial photographs indicate that a majority of this area had been altered with fill material in the 1950s.

Although soils throughout AOC 721 were very similar in low matrix chroma (typically in the 2/1 to 7/1 chroma range), textures varied greatly from silty sands to silty clay. This is largely due to the human alteration and tidal influence in this area. All of the test pits exhibited hydric soil conditions with gleyed and low-chroma colors with some test pits containing contrasting reddish mottles. A mild sulfidic odor was noted in a few test pits (test pits A1, B1, and C1) located in the storm water drainage ditch indicating reducing conditions are present. It should be noted that the presence of fill material is scattered throughout this area.



Legend

- Critical Habitat Delineation Line
- Wetland Delineation Transect A
- Wetland Delineation Locations
- Groundwater Monitoring Well Locations
- Sediment Sample Location
- Surface Soil Sample Location
- Water
- Rail Road
- Drainage Basin
- Road
- AOC 721 RFI Boundary
- Water Feature



Figure 2-1
Critical Habitat Delineation
 Located with DGPS on
 9/1/2004

AOC 721
Charleston Naval Complex
Charleston, South Carolina

2.2 Hydrology Conditions

Storm water from AOC 721 and its surroundings are conveyed into the onsite drainage ditch and flow into Noisette Creek contributing to the wetland hydrology. Tidal energy from Charleston Harbor influences the hydrology of Noisette Creek and the drainage ditch in AOC 721. Salinity measurements of water in the drainage ditch were not collected during this site visit, however during the RFI for AOC 721 surface water samples collected at the tide cycles recorded salinity readings of 9.6 and 11.2 grams/liter respectively and the dominance of salt tolerant wetland species near the outlet of the drainage ditch illustrate the tidal influence. Additionally, fiddler crab burrows were noticed in the drainage ditch near the outfall into Noisette Creek and in low-lying adjacent areas in AOC 721. The drainage ditch is bound to the west by a perimeter road. Low lying areas to the adjacent drainage ditch are influenced by retention water and overflow water from the drainage ditch. The remaining areas of AOC 721 that exhibit wetland hydrology are in low lying areas that tend to pond water during times of rainfall and/or high tide.

Wetland hydrology criteria are interspersed in AOC 721 and were not present in several test pit areas. Test pits A2, A3, B4 and D1 were lacking wetland hydrology. Several other areas within AOC 721 were lacking wetland hydrology. The pattern was largely attributable to subtle elevation variances. The wetland hydrology exhibited a mosaic pattern in AOC 721, with approximately 70 percent having wetland hydrology and 30 percent lacking wetland hydrology. The water depth in the drainage ditch ranged from less than 1 inch to approximately 6 inches.

2.3 Vegetative Conditions

A majority of AOC 721 is densely vegetated with a scrub-shrub and herbs. Vegetative communities present within the onsite wetland areas were dominated by scrub-shrub and herb layer species in and around the visibly wet areas including salt marsh bulrush, *Scirpus robustus* (OBL); Black grass, *Juncus gerardii* (OBL); Salt grass, *Distichlis spicata* (FACW+); Sea ox-eye, *Borrchia frutescens* (OBL); Wax myrtle, *Myrica cerifera* (FAC+); Marsh elder, *Iva frutescens* (FACW+); Laurel oak, *Quercus laurifolia* (FACW); Southern dewberry, *Rubus trivialis* (FAC); Poison ivy, *Toxicodendron radicans* (FAC); Virginia creeper, *Parthenocissus quinquefolia* (FAC), Sea myrtle, *Baccharis halimifolia* (OBL). Other species were present and recorded on the Routine Wetland Determination Forms in Appendix B.

The dominant species throughout the site were facultative to obligate. Upland species were not found surrounding any of the test pits nor observed in AOC 721. A few salt tolerant species (*Borrchia frutescens*, *Baccharis halimifolia*) were dominant near the outlet of the drainage ditch into Noisette Creek illustrating the influence on salinity in this portion of AOC 721.

3.0 DELINEATED WETLANDS

A concrete culvert feeds the approximate 650 foot drainage ditch that runs the length of AOC 721 and discharges into Noisette Creek. As the drainage ditch approaches Noisette Creek, AOC 721 widens to the east. The entire length of the drainage ditch exhibits wetland criteria for hydrology, vegetation and hydric soils. As AOC 721 widens, wetland vegetation and hydric soils persist. However, hydrology in the widened area has a mosaic pattern with approximately 70 percent exhibiting wetland hydrology and 30 percent non-wetland hydrology. The portions of this area lacking wetland hydrology are limited to slight rises in the ground surface's elevation. These areas are small enough that separating them out for functional use is not practical and therefore all of the 1.6-acres comprising AOC 721, including areas lacking wetland hydrology, is included as delineated wetlands. The wetland boundaries, as shown in Figure 3, constitute the total area of jurisdictional waters of the U.S. within the AOC 721.

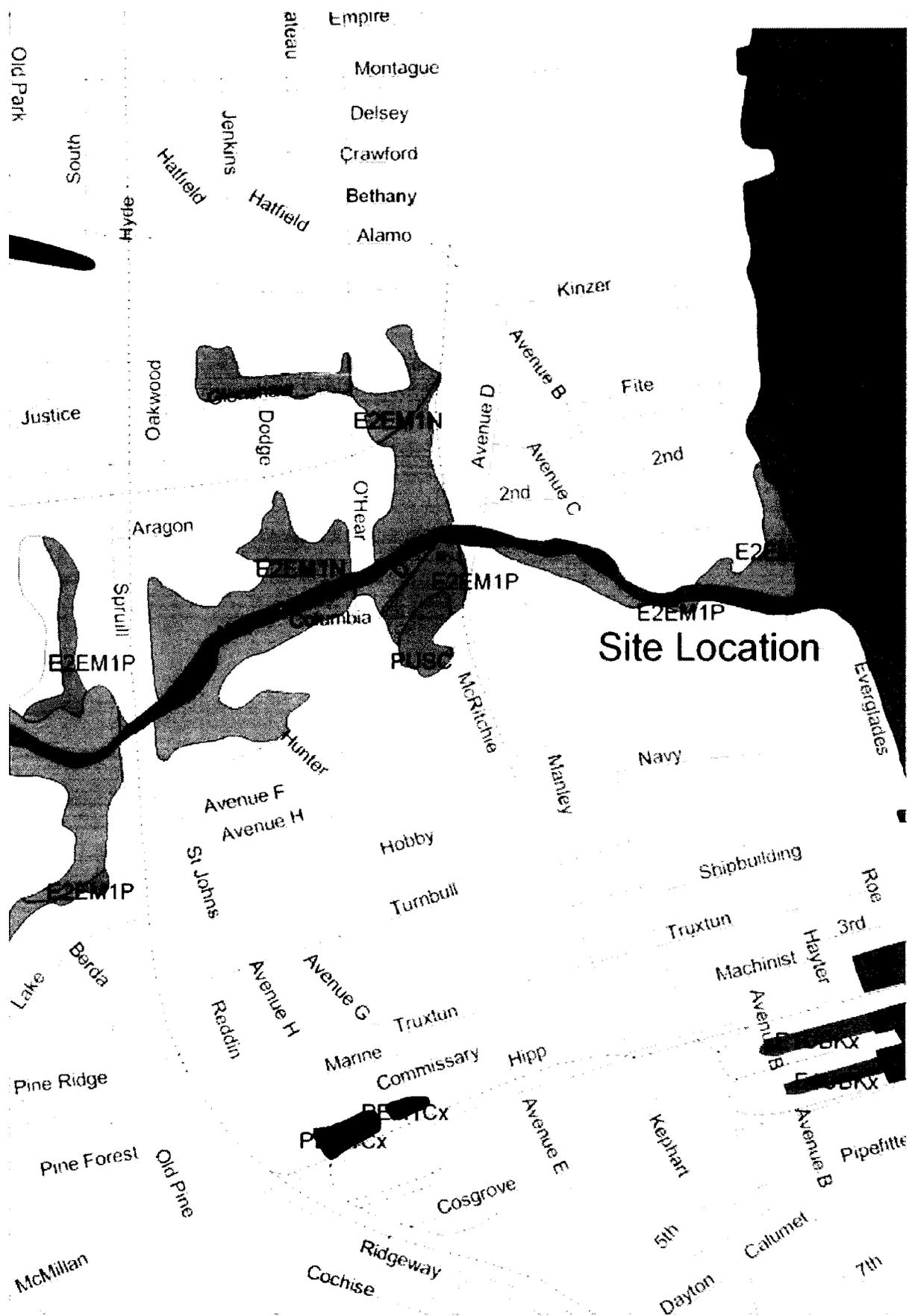
According to the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) map (Figure 3), AOC 721 lies within an estuarine, intertidal, emergent, persistent, irregularly flooded wetland. The wetland delineation site visit confirmed findings of the USFWS NWI map. AOC 721 lies along Noisette Creek and is irregularly flooded by its tidal waters which flood portions of the drainage ditch less often than daily. Persistent vegetation is found in the area and appears year round throughout AOC 721.

3.1 Functions and Values of Identified Wetlands

Wetland habitats can provide significant functions in their surrounding environment. These functions are typically complex, interrelated, and difficult to assess and quantify. Based on observations, the wetlands in this area likely help abate ocean storms by buffering their energy prior to coming onto the mainland. These wetlands are capable of removing nutrients and sediments that would otherwise flow through the drainage ditch into Noisette Creek. The delineated wetland areas contain moderate quality habitat. Several bird species were noted in the area and Fiddler crabs were observed in and along the drainage ditch as it approached Noisette Creek.

3.2 Critical Habitat Identification

Within the area delineated as jurisdictional wetland, some of these areas also meet the OCRM definition of critical habitat. These areas are characterized by the presence of salt tolerant plant species and fiddler crab burrows. Generally speaking the area identified as critical habitat includes the area between the old frontage road on the east to the row of wax myrtle (*Myrica cerifera*) trees within AOC 721. Critical habitat areas are identified on Figure 2-1. Sample locations previously identified as surface soil locations will now be evaluated as sediment.



400 0 400 800 Feet



AOC 721
 Wetland Delineation Report
 Charleston Naval Complex
 Charleston, South Carolina

Figure 3 - USFWS National Wetland Inventory Map



4.0 Areas Potentially Regulated by the Army Corps Of Engineers

All potential wetland areas addressed in this report are regulated under Section 404 of the Clean Water Act which regulates activities that result in the discharge of dredge or fill materials into waters of the United States. Below are the definitions used to classify onsite aquatic resources.

Definition of Water of the U.S.

1. All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
2. All interstate waters including interstate wetlands;
3. All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters:
 - i) Which are or could be used by interstate or foreign travelers for recreational or other purposes; or
 - ii) From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or
 - iii) Which are used or could be used for industrial purpose by industries in interstate commerce;
4. All impoundments of waters otherwise defined as waters of the United States under the definition;
5. Tributaries of waters identified in paragraphs (a)(1)-(4) of this section;
6. The territorial seas;

7. Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (a)(1)-(6) of this section; Waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA (other than cooling ponds as defined in 40 CFR 123.11(m) which also meet the criteria of this definition) are not waters of the United States.

8. Waters of the United States do not include prior converted cropland. Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with the EPA.

Definition of a Wetland

Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas. (40 CFR § 230.3(t) and 33 CFR § 328.3(b).)

The areas subject to regulation under these Sections are the west and east lagoon areas as described in Section 3 and outlined on Figure 3.

5.0 REFERENCES

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Attachment A
Site Photographs

Attachment B
Wetland Data Forms

WETLAND DELINEATION REPORT

Conducted on

Charleston Naval Complex - AOC 721
Charleston, South Carolina

Project Code: 0164-001

For

SOUTHNAVFACENGCOM
2155 Eagle Drive
North Charleston, South Carolina

Issue Date: September 2, 2004

Gary Benfield
Environmental Scientist

Signature

Charlie Vernoy
Task Order Manager

Signature

Prepared by:

EnSafe Inc.
313 Wingo Way
Mount Pleasant, South Carolina 29464





Photo 7:
Soil profile from test pit B1.



Photo 8:
Borrchia frutescens (Sea Ox-eye) is the dominant vegetation in much of the area delineated as critical habitat.

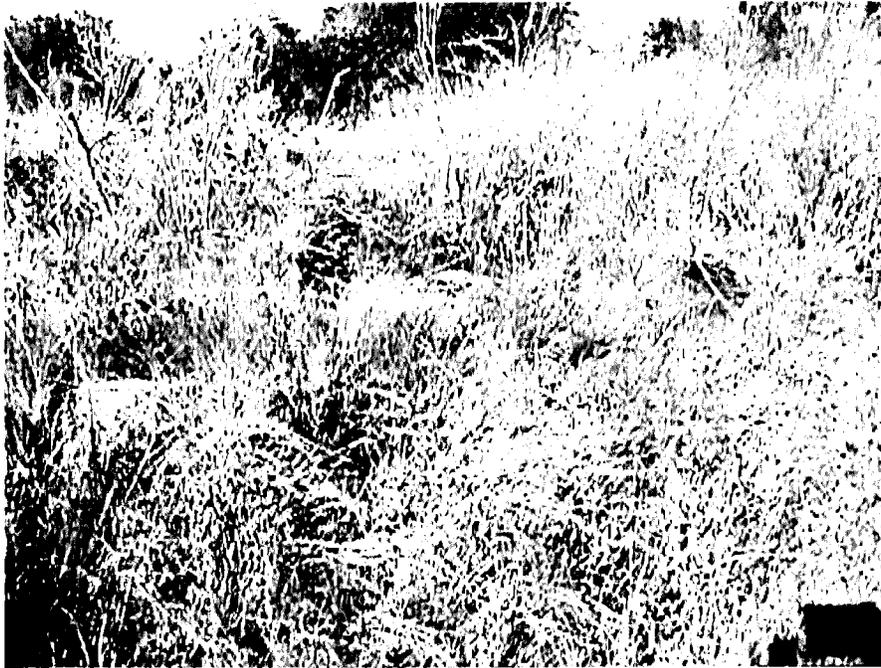


Photo 5:

Vegetation and conditions at location of test pit B1. This test pit was in the immediate vicinity of the highest arsenic concentrations in AOC 721



Photo 6:

Test pit B1. Notice standing water at bottom of test pit.



Photo 3:
Soil profile removed from test pit A1.



Photo 4:
Ponded area to the south of test pit B1.

**Wetland Report
Photo Log**



Photo 1:
Vegetation and conditions at location A1. Test pit was dug here to verify presence of hydric soils.



Photo 2:
Test pit A1. Note standing water in bottom of test pit.

SOILS

Map Unit Name (Series and Phase): <u> N/A </u>		Drainage Class <u> N/A </u>			
Taxonomy (Subgroup): <u> N/A </u>		Field Observations Confirm Mapped Type? <u> N/A </u>			
Profile Description:					
Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-2	O	10 YR3/1			Organic sands
2-10	A	10 YR3/1			Silty sand
10-16	B	10 YR 4/1			Silty sand
Hydric Soil Indicators:					
<u> </u>	Histosol	<u> </u>	Concretions		
<u> </u>	Histic Epipedon	<u> </u>	High Organic Content in Surface Layer in Sandy Soils		
<u> X </u>	Sulfidic Odor	<u> </u>	Organic Streaking in Sandy Soils		
<u> X </u>	Aquic Moisture Regime	<u> </u>	Listed on Local Hydric Soils List		
<u> </u>	Reducing Conditions	<u> </u>	Listed on National Hydric Soils List		
<u> X </u>	Gleyed or Low-chroma Colors	<u> </u>	Other (Explain in Remarks)		
Remarks: Light sulfidic odor. NRCS Soil Survey not readily available during site visit and not deemed to be highly accurate because historical aerial photographs indicate a majority of this area had been altered with fill material in the 1950s.					

WETLAND DETERMINATION

Hydrophytic Vegetation Present?	<u> Yes </u>	No	
Wetland Hydrology Present?	<u> Yes </u>	No	
Hydric Soils Present?	<u> Yes </u>	No	Is this Sampling Point within a Wetland? <u> Yes </u> No
Remarks:			

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 ACOE Wetlands Delineation Manual)

Project/Site: Area of Concern 721 Date: 7-01-04
 Applicant/Owner: Naval Facilities Engineering Command County: Charleston
 Investigator: Alex Bartos and Gary Benfield State: South Carolina

Do Normal Circumstances exist on the site? Yes No
 Is the site significantly disturbed (Atypical Situation)? Yes No
 Is the area a potential Problem Area? Yes No
 (if needed, explain on reverse)

Community ID: N/A
 Transect ID: A
 Plot ID: A1

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
<i>Scirpus robustus</i>	Herb	OBL			
<i>Juncus gerardi</i>	Herb	OBL			
<i>Borrichia frutescens</i>	Herb	OBL			
<i>Myrica cerifera</i>	Shrub	FAC+			
<i>Iva frutescens</i>	Shrub	FACW+			
<i>Quercus laurifolia</i>	Tree	FACW			
Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-)		<u>6/6 = 100%</u>			
Remarks:					

HYDROLOGY

<p>Recorded Data (Describe in Remarks):</p> <p><input type="checkbox"/> Stream, Lake, or Tide Gauge</p> <p><input type="checkbox"/> Aerial Photographs</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> No Recorded Data Available</p>	<p>Wetland Hydrology Indicators:</p> <p>Primary Indicators:</p> <p><input checked="" type="checkbox"/> Inundated</p> <p><input type="checkbox"/> Saturated in Upper 12 in.</p> <p><input type="checkbox"/> Water Marks</p> <p><input type="checkbox"/> Drift Lines</p> <p><input type="checkbox"/> Sediment Deposits</p> <p><input type="checkbox"/> Drainage Patterns in Wetlands</p> <p>Secondary Indicators (2 or more required):</p> <p><input type="checkbox"/> Oxidized Root Channels in Upper 12 in.</p> <p><input type="checkbox"/> Water-Stained Leaves</p> <p><input type="checkbox"/> Local Soil Survey Data</p> <p><input checked="" type="checkbox"/> FAC-Neutral Test</p> <p><input type="checkbox"/> Other (Explain in Remarks)</p>
<p>Field Observations:</p> <p>Depth of Surface Water: <u>1</u> (in.)</p> <p>Depth to Free Water in Pit: <u>0</u> (in.)</p> <p>Depth to Saturated Soil: <u>0</u> (in.)</p>	
Remarks:	

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 ACOE Wetlands Delineation Manual)

Project/Site: <u>Area of Concern 721</u>	Date: <u>7-01-04</u>
Applicant/Owner: <u>Naval Facilities Engineering Command</u>	County: <u>Charleston</u>
Investigator: <u>Alex Bartos and Gary Benfield</u>	State: <u>South Carolina</u>
Do Normal Circumstances exist on the site? Yes <u>No</u>	Community ID: <u>N/A</u>
Is the site significantly disturbed (Atypical Situation)? Yes <u>No</u>	Transect ID: <u>A</u>
Is the area a potential Problem Area? Yes <u>No</u>	Plot ID: <u>A2</u>
(if needed, explain on reverse)	

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
<i>Rubus trivialis</i>	Herb	FAC			
<i>Parthenocissus quinquefolia</i>	Herb	FAC			
<i>Toxicodendron radicans</i>	Herb	FAC			
<i>Myrica cerifera</i>	Shrub	FAC+			
<i>Quercus laurifolia</i>	Tree	FACW			
<i>Juniperus virginiana</i>	Tree	FAC-			
Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-)			<u>5/6 = 83.3%</u>		
Remarks:					

HYDROLOGY

<p>Recorded Data (Describe in Remarks):</p> <p><input type="checkbox"/> Stream, Lake, or Tide Gauge</p> <p><input type="checkbox"/> Aerial Photographs</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> No Recorded Data Available</p>	<p>Wetland Hydrology Indicators:</p> <p>Primary Indicators:</p> <p><input type="checkbox"/> Inundated</p> <p><input type="checkbox"/> Saturated in Upper 12 in.</p> <p><input type="checkbox"/> Water Marks</p> <p><input type="checkbox"/> Drift Lines</p> <p><input type="checkbox"/> Sediment Deposits</p> <p><input type="checkbox"/> Drainage Patterns in Wetlands</p> <p>Secondary Indicators (2 or more required):</p> <p><input type="checkbox"/> Oxidized Root Channels in Upper 12 in.</p> <p><input type="checkbox"/> Water-Stained Leaves</p> <p><input type="checkbox"/> Local Soil Survey Data</p> <p><input checked="" type="checkbox"/> FAC-Neutral Test</p> <p><input type="checkbox"/> Other (Explain in Remarks)</p>
<p>Field Observations:</p> <p>Depth of Surface Water: <u>none</u> (in.)</p> <p>Depth to Free Water in Pit: <u>none</u> (in.)</p> <p>Depth to Saturated Soil: <u>>18</u> (in.)</p>	
Remarks: Oxidized root channels present at depths greater than 12 inches below ground surface.	

SOILS

Map Unit Name (Series and Phase): <u> N/A </u>		Drainage Class <u> N/A </u>			
Taxonomy (Subgroup): <u> N/A </u>		Field Observations Confirm Mapped Type? <u> N/A </u>			
Profile Description:					
Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-1	O	7.5 YR 2.5/1			Organic silty sand
2-16	A	10 YR 3/2			Sandy clay loam
Hydric Soil Indicators:					
<input type="checkbox"/>	Histosol	<input type="checkbox"/>	Concretions		
<input type="checkbox"/>	Histic Epipedon	<input type="checkbox"/>	High Organic Content in Surface Layer in Sandy Soils		
<input type="checkbox"/>	Sulfidic Odor	<input type="checkbox"/>	Organic Streaking in Sandy Soils		
<input type="checkbox"/>	Aquic Moisture Regime	<input type="checkbox"/>	Listed on Local Hydric Soils List		
<input type="checkbox"/>	Reducing Conditions	<input type="checkbox"/>	Listed on National Hydric Soils List		
<input checked="" type="checkbox"/>	Gleyed or Low-chroma Colors	<input type="checkbox"/>	Other (Explain in Remarks)		
Remarks: NRCS Soil Survey not readily available during site visit and not deemed to be highly accurate because historical aerial photographs indicate a majority of this area had been altered with fill material in the 1950s.					

WETLAND DETERMINATION

Hydrophytic Vegetation Present?	<u>Yes</u>	No	
Wetland Hydrology Present?	Yes	<u>No</u>	
Hydric Soils Present?	<u>Yes</u>	No	Is this Sampling Point within a Wetland? Yes <u>No</u>
Remarks:			

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 ACOE Wetlands Delineation Manual)

Project/Site: <u>Area of Concern 721</u>	Date: <u>7-01-04</u>
Applicant/Owner: <u>Naval Facilities Engineering Command</u>	County: <u>Charleston</u>
Investigator: <u>Alex Bartos and Gary Benfield</u>	State: <u>South Carolina</u>
Do Normal Circumstances exist on the site?	<u>Yes</u> No
Is the site significantly disturbed (Atypical Situation)?	Yes <u>No</u>
Is the area a potential Problem Area? (if needed, explain on reverse)	Yes <u>No</u>
	Community ID: <u>N/A</u>
	Transect ID: <u>A</u>
	Plot ID: <u>A3</u>

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
<i>Toxicodendron radicans</i>	Herb	FAC			
<i>Rubus trivialis</i>	Herb	FAC			
<i>Borrichia frutescens</i>	Herb	OBL			
<i>Parthenocissus quinquefolia</i>	Herb	FAC			
<i>Myrica cerifera</i>	Shrub	FAC+			
Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-)			<u>5/5 = 100%</u>		
Remarks:					

HYDROLOGY

<p>Recorded Data (Describe in Remarks):</p> <p><input type="checkbox"/> Stream, Lake, or Tide Gauge</p> <p><input type="checkbox"/> Aerial Photographs</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> No Recorded Data Available</p>	<p>Wetland Hydrology Indicators:</p> <p>Primary Indicators:</p> <p><input type="checkbox"/> Inundated</p> <p><input type="checkbox"/> Saturated in Upper 12 in.</p> <p><input type="checkbox"/> Water Marks</p> <p><input type="checkbox"/> Drift Lines</p> <p><input type="checkbox"/> Sediment Deposits</p> <p><input type="checkbox"/> Drainage Patterns in Wetlands</p> <p>Secondary Indicators (2 or more required):</p> <p><input type="checkbox"/> Oxidized Root Channels in Upper 12 in.</p> <p><input type="checkbox"/> Water-Stained Leaves</p> <p><input type="checkbox"/> Local Soil Survey Data</p> <p><input checked="" type="checkbox"/> FAC-Neutral Test</p> <p><input type="checkbox"/> Other (Explain in Remarks)</p>
<p>Field Observations:</p> <p>Depth of Surface Water: <u>none</u> (in.)</p> <p>Depth to Free Water in Pit: <u>none</u> (in.)</p> <p>Depth to Saturated Soil: <u>none</u> (in.)</p>	
Remarks:	

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 ACOE Wetlands Delineation Manual)

Project/Site: Area of Concern 721 Date: 7-01-04
 Applicant/Owner: Naval Facilities Engineering Command County: Charleston
 Investigator: Alex Bartos and Gary Benfield State: South Carolina

Do Normal Circumstances exist on the site? Yes No
 Is the site significantly disturbed (Atypical Situation)? Yes No
 Is the area a potential Problem Area? Yes No
 (if needed, explain on reverse)

Community ID: N/A
 Transect ID: B
 Plot ID: B1

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
<i>Cyperus filicinus</i>	Shrub	OBL			
<i>Scirpus robustus</i>	Shrub	OBL			
<i>Baccharis halimifolia</i>	Shrub	OBL			
<i>Barrichia frutescens</i>	Shrub	OBL			
Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-)			<u>4/4 = 100%</u>		
Remarks:					

HYDROLOGY

<p>Recorded Data (Describe in Remarks):</p> <p><input type="checkbox"/> Stream, Lake, or Tide Gauge</p> <p><input type="checkbox"/> Aerial Photographs</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> No Recorded Data Available</p>	<p>Wetland Hydrology Indicators:</p> <p>Primary Indicators:</p> <p><input checked="" type="checkbox"/> Inundated</p> <p><input checked="" type="checkbox"/> Saturated in Upper 12 in.</p> <p><input type="checkbox"/> Water Marks</p> <p><input type="checkbox"/> Drift Lines</p> <p><input type="checkbox"/> Sediment Deposits</p> <p><input type="checkbox"/> Drainage Patterns in Wetlands</p> <p>Secondary Indicators (2 or more required):</p> <p><input type="checkbox"/> Oxidized Root Channels in Upper 12 in.</p> <p><input checked="" type="checkbox"/> Water-Stained Leaves</p> <p><input type="checkbox"/> Local Soil Survey Data</p> <p><input checked="" type="checkbox"/> FAC-Neutral Test</p> <p><input type="checkbox"/> Other (Explain in Remarks)</p>
<p>Field Observations:</p> <p>Depth of Surface Water: <u>0.5</u> (in.)</p> <p>Depth to Free Water in Pit: <u>0</u> (in.)</p> <p>Depth to Saturated Soil: <u>0</u> (in.)</p>	
Remarks:	

SOILS

Map Unit Name _____
 (Series and Phase): N/A _____ Drainage Class N/A _____
 Taxonomy (Subgroup): N/A _____ Field Observations _____
 Confirm Mapped Type? N/A

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-1	O	5 YR 2.5/1	10 R 4/6	~5%, <2mm	Organic silt
1-8	A	10 YR 3/1	10 R 3/6	~5%, <2mm	Clayey silt
8-10	A	10 YR 4/1	10 R 3/6	~20%, <7mm	Sandy silt
10-14	B	5 YR 6/1	10 R 3/6	~20%, , 7mm	Sandy silt

Hydric Soil Indicators:

<input type="checkbox"/> Histosol	<input type="checkbox"/> Concretions
<input type="checkbox"/> Histic Epipedon	<input type="checkbox"/> High Organic Content in Surface Layer in Sandy Soils
<input checked="" type="checkbox"/> Sulfidic Odor	<input type="checkbox"/> Organic Streaking in Sandy Soils
<input checked="" type="checkbox"/> Aquic Moisture Regime	<input type="checkbox"/> Listed on Local Hydric Soils List
<input type="checkbox"/> Reducing Conditions	<input type="checkbox"/> Listed on National Hydric Soils List
<input checked="" type="checkbox"/> Gleyed or Low-chroma Colors	<input type="checkbox"/> Other (Explain in Remarks)

Remarks: Low sulfidic odor. NRCs Soil Survey not readily available during site visit and not deemed to be highly accurate because historical aerial photographs indicate a majority of this area had been altered with fill material in the 1950s.

WETLAND DETERMINATION

Hydrophytic Vegetation Present?	<u>Yes</u> No	
Wetland Hydrology Present?	<u>Yes</u> No	
Hydric Soils Present?	<u>Yes</u> No	Is this Sampling Point within a Wetland? <u>Yes</u> No
Remarks:		

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 ACOE Wetlands Delineation Manual)

Project/Site: Area of Concern 721 Date: 7-01-04
 Applicant/Owner: Naval Facilities Engineering Command County: Charleston
 Investigator: Alex Bartos and Gary Benfield State: South Carolina

Do Normal Circumstances exist on the site? Yes No
 Is the site significantly disturbed (Atypical Situation)? Yes No
 Is the area a potential Problem Area? Yes No
 (if needed, explain on reverse)

Community ID: N/A
 Transect ID: B
 Plot ID: B2

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
<i>Cyperus filicinus</i>	Herb	OBL			
<i>Myrica cerifera</i>	Shrub	FAC+			
<i>Baccharis halimifolia</i>	Shrub	FAC			
<i>Barrichia frutescens</i>	Shrub	OBL			
Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-)			<u>4/4 = 100%</u>		
Remarks: Passes Fac Neutral test					

HYDROLOGY

<p>Recorded Data (Describe in Remarks):</p> <p><input type="checkbox"/> Stream, Lake, or Tide Gauge</p> <p><input type="checkbox"/> Aerial Photographs</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> No Recorded Data Available</p>	<p>Wetland Hydrology Indicators:</p> <p>Primary Indicators:</p> <p><input type="checkbox"/> Inundated</p> <p><input checked="" type="checkbox"/> Saturated in Upper 12 in.</p> <p><input type="checkbox"/> Water Marks</p> <p><input type="checkbox"/> Drift Lines</p> <p><input type="checkbox"/> Sediment Deposits</p> <p><input type="checkbox"/> Drainage Patterns in Wetlands</p> <p>Secondary Indicators (2 or more required):</p> <p><input checked="" type="checkbox"/> Oxidized Root Channels in Upper 12 in.</p> <p><input checked="" type="checkbox"/> Water-Stained Leaves</p> <p><input type="checkbox"/> Local Soil Survey Data</p> <p><input checked="" type="checkbox"/> FAC-Neutral Test</p> <p><input type="checkbox"/> Other (Explain in Remarks)</p>
<p>Field Observations:</p> <p>Depth of Surface Water: <u>none</u> (in.)</p> <p>Depth to Free Water in Pit: <u>14</u> (in.)</p> <p>Depth to Saturated Soil: <u>11</u> (in.)</p>	
Remarks: Recent heavy rains.	

SOILS

Map Unit Name (Series and Phase): <u> N/A </u>		Drainage Class <u> N/A </u>			
Taxonomy (Subgroup): <u> N/A </u>		Field Observations Confirm Mapped Type? <u> N/A </u>			
Profile Description:					
Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-1	O	2.5 YR 4/1	10 R 4/6	~5%, <2mm	Organic silty sand
1-12	A	5 YR 7/1			Silty sand
Hydric Soil Indicators:					
<input type="checkbox"/>	Histosol	<input type="checkbox"/>	Concretions		
<input type="checkbox"/>	Histic Epipedon	<input type="checkbox"/>	High Organic Content in Surface Layer in Sandy Soils		
<input type="checkbox"/>	Sulfidic Odor	<input type="checkbox"/>	Organic Streaking in Sandy Soils		
<input type="checkbox"/>	Aquic Moisture Regime	<input type="checkbox"/>	Listed on Local Hydric Soils List		
<input type="checkbox"/>	Reducing Conditions	<input type="checkbox"/>	Listed on National Hydric Soils List		
<input checked="" type="checkbox"/>	Gleyed or Low-chroma Colors	<input type="checkbox"/>	Other (Explain in Remarks)		
Remarks: NRCS Soil Survey not readily available during site visit and not deemed to be highly accurate because historical aerial photographs indicate a majority of this area had been altered with fill material in the 1950s.					

WETLAND DETERMINATION

Hydrophytic Vegetation Present?	<u>Yes</u>	No	
Wetland Hydrology Present?	<u>Yes</u>	No	
Hydric Soils Present?	<u>Yes</u>	No	Is this Sampling Point within a Wetland? <u>Yes</u> No
Remarks:			

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 ACOE Wetlands Delineation Manual)

Project/Site: <u>Area of Concern 721</u>	Date: <u>7-01-04</u>
Applicant/Owner: <u>Naval Facilities Engineering Command</u>	County: <u>Charleston</u>
Investigator: <u>Alex Bartos and Gary Benfield</u>	State: <u>South Carolina</u>
Do Normal Circumstances exist on the site? <u>Yes</u> No	Community ID: <u>N/A</u>
Is the site significantly disturbed (Atypical Situation)? <u>Yes</u> <u>No</u>	Transect ID: <u>B</u>
Is the area a potential Problem Area? (if needed, explain on reverse)	Plot ID: <u>B3</u>

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
<i>Cyperus filicinus</i>	Herb	OBL			
<i>Juncus sp.</i>	Herb	--			
<i>Baccharis halimifolia</i>	Shrub	FAC			
<i>Myrica cerifera</i>	Shrub	FAC+			
Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-)			<u>3/4 = 75%</u>		
Remarks:					

HYDROLOGY

<p>Recorded Data (Describe in Remarks):</p> <p><input type="checkbox"/> Stream, Lake, or Tide Gauge</p> <p><input type="checkbox"/> Aerial Photographs</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> No Recorded Data Available</p>	<p>Wetland Hydrology Indicators:</p> <p>Primary Indicators:</p> <p><input type="checkbox"/> Inundated</p> <p><input checked="" type="checkbox"/> Saturated in Upper 12 in.</p> <p><input type="checkbox"/> Water Marks</p> <p><input type="checkbox"/> Drift Lines</p> <p><input type="checkbox"/> Sediment Deposits</p> <p><input type="checkbox"/> Drainage Patterns in Wetlands</p> <p>Secondary Indicators (2 or more required):</p> <p><input type="checkbox"/> Oxidized Root Channels in Upper 12 in.</p> <p><input checked="" type="checkbox"/> Water-Stained Leaves</p> <p><input type="checkbox"/> Local Soil Survey Data</p> <p><input checked="" type="checkbox"/> FAC-Neutral Test</p> <p><input type="checkbox"/> Other (Explain in Remarks)</p>
<p>Field Observations:</p> <p>Depth of Surface Water: <u>none</u> (in.)</p> <p>Depth to Free Water in Pit: <u>14</u> (in.)</p> <p>Depth to Saturated Soil: <u>11</u> (in.)</p>	
Remarks: Recent heavy rains.	

SOILS

Map Unit Name _____
 (Series and Phase): N/A _____ Drainage Class N/A _____
 Taxonomy (Subgroup): N/A _____ Field Observations _____
 Confirm Mapped Type? N/A

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-1	O	2.5 YR 4/1	10 R 4/6	~5%, <2mm	Organic silty sand
1-14	A	5 YR 7/1			Silty sand

Hydric Soil Indicators:

- | | |
|---|---|
| <input type="checkbox"/> Histosol | <input type="checkbox"/> Concretions |
| <input type="checkbox"/> Histic Epipedon | <input type="checkbox"/> High Organic Content in Surface Layer in Sandy Soils |
| <input type="checkbox"/> Sulfidic Odor | <input type="checkbox"/> Organic Streaking in Sandy Soils |
| <input type="checkbox"/> Aquic Moisture Regime | <input type="checkbox"/> Listed on Local Hydric Soils List |
| <input type="checkbox"/> Reducing Conditions | <input type="checkbox"/> Listed on National Hydric Soils List |
| <input checked="" type="checkbox"/> Gleyed or Low-chroma Colors | <input type="checkbox"/> Other (Explain in Remarks) |

Remarks: NRCS Soil Survey not readily available during site visit and not deemed to be highly accurate because historical aerial photographs indicate a majority of this area had been altered with fill material in the 1950s.

WETLAND DETERMINATION

Hydrophytic Vegetation Present?	<u>Yes</u> No	
Wetland Hydrology Present?	<u>Yes</u> No	
Hydric Soils Present?	<u>Yes</u> No	Is this Sampling Point within a Wetland? <u>Yes</u> No

Remarks:

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 ACOE Wetlands Delineation Manual)

Project/Site: <u>Area of Concern 721</u>	Date: <u>7-01-04</u>
Applicant/Owner: <u>Naval Facilities Engineering Command</u>	County: <u>Charleston</u>
Investigator: <u>Alex Bartos and Gary Benfield</u>	State: <u>South Carolina</u>
Do Normal Circumstances exist on the site? <u>Yes</u> No	Community ID: <u>N/A</u>
Is the site significantly disturbed (Atypical Situation)? Yes <u>No</u>	Transect ID: <u>B</u>
Is the area a potential Problem Area? Yes <u>No</u>	Plot ID: <u>B4</u>
(if needed, explain on reverse)	

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
<i>Parthenocissus quinquefolia</i>	Herb	FAC			
<i>Ampelopsis arborea</i>	Herb	FAC+			
<i>Rubus trivialis</i>	Herb	FAC			
<i>Myrica cerifera</i>	Shrub	FAC+			
Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-)			<u>4/4 = 100%</u>		
Remarks:					

HYDROLOGY

<p>Recorded Data (Describe in Remarks):</p> <p><input type="checkbox"/> Stream, Lake, or Tide Gauge</p> <p><input type="checkbox"/> Aerial Photographs</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> No Recorded Data Available</p>	<p>Wetland Hydrology Indicators:</p> <p>Primary Indicators:</p> <p><input type="checkbox"/> Inundated</p> <p><input type="checkbox"/> Saturated in Upper 12 in.</p> <p><input type="checkbox"/> Water Marks</p> <p><input type="checkbox"/> Drift Lines</p> <p><input type="checkbox"/> Sediment Deposits</p> <p><input type="checkbox"/> Drainage Patterns in Wetlands</p> <p>Secondary Indicators (2 or more required):</p> <p><input type="checkbox"/> Oxidized Root Channels in Upper 12 in.</p> <p><input type="checkbox"/> Water-Stained Leaves</p> <p><input type="checkbox"/> Local Soil Survey Data</p> <p><input type="checkbox"/> FAC-Neutral Test</p> <p><input type="checkbox"/> Other (Explain in Remarks)</p>
<p>Field Observations:</p> <p>Depth of Surface Water: <u>none</u> (in.)</p> <p>Depth to Free Water in Pit: <u>none</u> (in.)</p> <p>Depth to Saturated Soil: <u>none</u> (in.)</p>	
Remarks: Recent heavy rains.	

SOILS

Map Unit Name _____
 (Series and Phase): N/A _____ Drainage Class N/A _____
 Taxonomy (Subgroup): N/A _____ Field Observations _____
 Confirm Mapped Type? N/A

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-1	O	7.5 YR 2/1			Organic silty sand
1-14	A	5 YR 3/1	2.5 YR 3/6	~40%, <10mm	Silty sand

Hydric Soil Indicators:

<input type="checkbox"/> Histosol	<input type="checkbox"/> Concretions
<input type="checkbox"/> Histic Epipedon	<input type="checkbox"/> High Organic Content in Surface Layer in Sandy Soils
<input type="checkbox"/> Sulfidic Odor	<input type="checkbox"/> Organic Streaking in Sandy Soils
<input type="checkbox"/> Aquic Moisture Regime	<input type="checkbox"/> Listed on Local Hydric Soils List
<input type="checkbox"/> Reducing Conditions	<input type="checkbox"/> Listed on National Hydric Soils List
<input checked="" type="checkbox"/> Gleyed or Low-chroma Colors	<input type="checkbox"/> Other (Explain in Remarks)

Remarks: NRCS Soil Survey not readily available during site visit and not deemed to be highly accurate because historical aerial photographs indicate a majority of this area had been altered with fill material in the 1950s.

WETLAND DETERMINATION

Hydrophytic Vegetation Present?	<u>Yes</u> No	
Wetland Hydrology Present?	Yes <u>No</u>	
Hydric Soils Present?	<u>Yes</u> No	Is this Sampling Point within a Wetland? Yes <u>No</u>
Remarks:		

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 ACOE Wetlands Delineation Manual)

Project/Site: <u>Area of Concern 721</u>	Date: <u>7-01-04</u>
Applicant/Owner: <u>Naval Facilities Engineering Command</u>	County: <u>Charleston</u>
Investigator: <u>Alex Bartos and Gary Benfield</u>	State: <u>South Carolina</u>
Do Normal Circumstances exist on the site? <u>Yes</u> No	Community ID: <u>N/A</u>
Is the site significantly disturbed (Atypical Situation)? Yes <u>No</u>	Transect ID: <u>C</u>
Is the area a potential Problem Area? (if needed, explain on reverse) Yes <u>No</u>	Plot ID: <u>C1</u>

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
<i>Scirpus robustus</i>	Herb	OBL			
<i>Juncus gerardi</i>	Herb	OBL			
<i>Borrichia frutescens</i>	Herb	OBL			
<i>Iva frutescens</i>	Shrub	FACW+			
Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-)			<u>4/4 = 100%</u>		
Remarks:					

HYDROLOGY

<p>Recorded Data (Describe in Remarks):</p> <p><input type="checkbox"/> Stream, Lake, or Tide Gauge</p> <p><input type="checkbox"/> Aerial Photographs</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> No Recorded Data Available</p>	<p>Wetland Hydrology Indicators:</p> <p>Primary Indicators:</p> <p><input checked="" type="checkbox"/> Inundated</p> <p><input checked="" type="checkbox"/> Saturated in Upper 12 in.</p> <p><input type="checkbox"/> Water Marks</p> <p><input type="checkbox"/> Drift Lines</p> <p><input type="checkbox"/> Sediment Deposits</p> <p><input type="checkbox"/> Drainage Patterns in Wetlands</p> <p>Secondary Indicators (2 or more required):</p> <p><input type="checkbox"/> Oxidized Root Channels in Upper 12 in.</p> <p><input type="checkbox"/> Water-Stained Leaves</p> <p><input type="checkbox"/> Local Soil Survey Data</p> <p><input checked="" type="checkbox"/> FAC-Neutral Test</p> <p><input type="checkbox"/> Other (Explain in Remarks)</p>
<p>Field Observations:</p> <p>Depth of Surface Water: <u>1</u> (in.)</p> <p>Depth to Free Water in Pit: <u>0</u> (in.)</p> <p>Depth to Saturated Soil: <u>0</u> (in.)</p>	
Remarks:	

SOILS

Map Unit Name _____
 (Series and Phase): N/A _____ Drainage Class N/A _____
 Taxonomy (Subgroup): N/A _____ Field Observations _____
 Confirm Mapped Type? N/A

Profile Description:

Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-1	O	10 YR3/1			Organic sands
1-10	A	10 YR3/1			Silty sand
10-18	B	10 YR 4/1			Silty sand

Hydric Soil Indicators:

- | | |
|---|---|
| <input type="checkbox"/> Histosol | <input type="checkbox"/> Concretions |
| <input type="checkbox"/> Histic Epipedon | <input type="checkbox"/> High Organic Content in Surface Layer in Sandy Soils |
| <input checked="" type="checkbox"/> Sulfidic Odor | <input type="checkbox"/> Organic Streaking in Sandy Soils |
| <input checked="" type="checkbox"/> Aquic Moisture Regime | <input type="checkbox"/> Listed on Local Hydric Soils List |
| <input type="checkbox"/> Reducing Conditions | <input type="checkbox"/> Listed on National Hydric Soils List |
| <input checked="" type="checkbox"/> Gleyed or Low-chroma Colors | <input type="checkbox"/> Other (Explain in Remarks) |

Remarks: Light sulfidic odor. NRCS Soil Survey not readily available during site visit and not deemed to be highly accurate because historical aerial photographs indicate a majority of this area had been altered with fill material in the 1950s.

WETLAND DETERMINATION

Hydrophytic Vegetation Present? Yes No	
Wetland Hydrology Present? Yes No	
Hydric Soils Present? Yes No	Is this Sampling Point within a Wetland? Yes No
Remarks:	

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 ACOE Wetlands Delineation Manual)

Project/Site: <u>Area of Concern 721</u>	Date: <u>7-01-04</u>
Applicant/Owner: <u>Naval Facilities Engineering Command</u>	County: <u>Charleston</u>
Investigator: <u>Alex Bartos and Gary Benfield</u>	State: <u>South Carolina</u>
Do Normal Circumstances exist on the site? <u>Yes</u> No	Community ID: <u>N/A</u>
Is the site significantly disturbed (Atypical Situation)? Yes <u>No</u>	Transect ID: <u>C</u>
Is the area a potential Problem Area? Yes <u>No</u>	Plot ID: <u>C2</u>
(if needed, explain on reverse)	

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
<i>Borrchia frutescens</i>	Herb	OBL			
<i>Toxicodendron radicans</i>	Herb	FAC			
<i>Parthenocissus quinquefolia</i>	Herb	FAC			
<i>Iva frutescens</i>	Shrub	FACW+			
<i>Myrica cerifera</i>	Shrub	FAC+			
Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-)			<u>5/5 = 100%</u>		
Remarks:					

HYDROLOGY

<p>Recorded Data (Describe in Remarks):</p> <p><input type="checkbox"/> Stream, Lake, or Tide Gauge</p> <p><input type="checkbox"/> Aerial Photographs</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> No Recorded Data Available</p>	<p>Wetland Hydrology Indicators:</p> <p>Primary Indicators:</p> <p><input type="checkbox"/> Inundated</p> <p><input checked="" type="checkbox"/> Saturated in Upper 12 in.</p> <p><input type="checkbox"/> Water Marks</p> <p><input type="checkbox"/> Drift Lines</p> <p><input type="checkbox"/> Sediment Deposits</p> <p><input type="checkbox"/> Drainage Patterns in Wetlands</p> <p>Secondary Indicators (2 or more required):</p> <p><input type="checkbox"/> Oxidized Root Channels in Upper 12 in.</p> <p><input checked="" type="checkbox"/> Water-Stained Leaves</p> <p><input type="checkbox"/> Local Soil Survey Data</p> <p><input checked="" type="checkbox"/> FAC-Neutral Test</p> <p><input type="checkbox"/> Other (Explain in Remarks)</p>
<p>Field Observations:</p> <p>Depth of Surface Water: <u>none</u> (in.)</p> <p>Depth to Free Water in Pit: <u>11</u> (in.)</p> <p>Depth to Saturated Soil: <u>8</u> (in.)</p>	
Remarks: Recent heavy rains.	

SOILS

Map Unit Name		(Series and Phase): <u>N/A</u>		Drainage Class <u>N/A</u>	
Taxonomy (Subgroup): <u>N/A</u>		Field Observations		Confirm Mapped Type? <u>N/A</u>	
Profile Description:					
Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-1	O	7.5 YR 2.5/1			Organic silty loam
1-8	A	10 YR 7/2			Sandy loam
8-14	B	10 YR 7/2	10 YR 7/6	~5%, <5mm	Clayey loam
Hydric Soil Indicators:					
<input type="checkbox"/>	Histosol	<input type="checkbox"/>	Concretions		
<input type="checkbox"/>	Histic Epipedon	<input type="checkbox"/>	High Organic Content in Surface Layer in Sandy Soils		
<input type="checkbox"/>	Sulfidic Odor	<input type="checkbox"/>	Organic Streaking in Sandy Soils		
<input type="checkbox"/>	Aquic Moisture Regime	<input type="checkbox"/>	Listed on Local Hydric Soils List		
<input type="checkbox"/>	Reducing Conditions	<input type="checkbox"/>	Listed on National Hydric Soils List		
<input checked="" type="checkbox"/>	Gleyed or Low-chroma Colors	<input type="checkbox"/>	Other (Explain in Remarks)		
Remarks: NRCS Soil Survey not readily available during site visit and not deemed to be highly accurate because historical aerial photographs indicate a majority of this area had been altered with fill material in the 1950s.					

WETLAND DETERMINATION

Hydrophytic Vegetation Present?	<u>Yes</u>	No	
Wetland Hydrology Present?	<u>Yes</u>	No	
Hydric Soils Present?	<u>Yes</u>	No	Is this Sampling Point within a Wetland? <u>Yes</u> No
Remarks:			

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 ACOE Wetlands Delineation Manual)

Project/Site: <u>Area of Concern 721</u>	Date: <u>7-01-04</u>
Applicant/Owner: <u>Naval Facilities Engineering Command</u>	County: <u>Charleston</u>
Investigator: <u>Alex Bartos and Gary Benfield</u>	State: <u>South Carolina</u>
Do Normal Circumstances exist on the site? <u>Yes</u> No	Community ID: <u>N/A</u>
Is the site significantly disturbed (Atypical Situation)? <u>Yes</u> No	Transect ID: <u>C</u>
Is the area a potential Problem Area? <u>Yes</u> No (if needed, explain on reverse)	Plot ID: <u>C3</u>

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
<i>Sapium sebiferum</i>	Herb	FAC			
<i>Toxicodendron radicans</i>	Herb	FAC			
<i>Parthenocissus quinquefolia</i>	Herb	FAC			
<i>Iva frutescens</i>	Shrub	FACW+			
<i>Myrica cerifera</i>	Shrub	FAC+			
Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-)			<u>5/5 = 100%</u>		
Remarks:					

HYDROLOGY

<p>Recorded Data (Describe in Remarks):</p> <p><input type="checkbox"/> Stream, Lake, or Tide Gauge</p> <p><input type="checkbox"/> Aerial Photographs</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> No Recorded Data Available</p>	<p>Wetland Hydrology Indicators:</p> <p>Primary Indicators:</p> <p><input type="checkbox"/> Inundated</p> <p><input checked="" type="checkbox"/> Saturated in Upper 12 in.</p> <p><input type="checkbox"/> Water Marks</p> <p><input type="checkbox"/> Drift Lines</p> <p><input type="checkbox"/> Sediment Deposits</p> <p><input type="checkbox"/> Drainage Patterns in Wetlands</p> <p>Secondary Indicators (2 or more required):</p> <p><input type="checkbox"/> Oxidized Root Channels in Upper 12 in.</p> <p><input checked="" type="checkbox"/> Water-Stained Leaves</p> <p><input type="checkbox"/> Local Soil Survey Data</p> <p><input checked="" type="checkbox"/> FAC-Neutral Test</p> <p><input type="checkbox"/> Other (Explain in Remarks)</p>
<p>Field Observations:</p> <p>Depth of Surface Water: <u>none</u> (in.)</p> <p>Depth to Free Water in Pit: <u>16</u> (in.)</p> <p>Depth to Saturated Soil: <u>3</u> (in.)</p>	
Remarks: Recent heavy rains.	

SOILS

Map Unit Name (Series and Phase): <u> N/A </u>		Drainage Class <u> N/A </u>			
Taxonomy (Subgroup): <u> N/A </u>		Field Observations Confirm Mapped Type? <u> N/A </u>			
Profile Description:					
Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-1	O	7.5 YR 2.5/1			Organic silt
1-6*	A	7.5 YR 5/6	N 7/ -	~10%, <7 mm	Sandy loam
6-16	A	N 5/ -			Sandy clay
Hydric Soil Indicators:					
<input type="checkbox"/>	Histosol	<input type="checkbox"/>	Concretions		
<input type="checkbox"/>	Histic Epipedon	<input type="checkbox"/>	High Organic Content in Surface Layer in Sandy Soils		
<input type="checkbox"/>	Sulfidic Odor	<input type="checkbox"/>	Organic Streaking in Sandy Soils		
<input type="checkbox"/>	Aquic Moisture Regime	<input type="checkbox"/>	Listed on Local Hydric Soils List		
<input type="checkbox"/>	Reducing Conditions	<input type="checkbox"/>	Listed on National Hydric Soils List		
<input checked="" type="checkbox"/>	Gleyed or Low-chroma Colors	<input type="checkbox"/>	Other (Explain in Remarks)		
Remarks: NRCS Soil Survey not readily available during site visit and not deemed to be highly accurate because historical aerial photographs indicate a majority of this area had been altered with fill material in the 1950s. 1-6 inch interval 50% matrix, 50% mottled					

WETLAND DETERMINATION

Hydrophytic Vegetation Present?	<u>Yes</u>	No	
Wetland Hydrology Present?	<u>Yes</u>	No	
Hydric Soils Present?	<u>Yes</u>	No	Is this Sampling Point within a Wetland? <u>Yes</u> No
Remarks:			

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 ACOE Wetlands Delineation Manual)

Project/Site: <u>Area of Concern 721</u>	Date: <u>7-01-04</u>
Applicant/Owner: <u>Naval Facilities Engineering Command</u>	County: <u>Charleston</u>
Investigator: <u>Alex Bartos and Gary Benfield</u>	State: <u>South Carolina</u>
Do Normal Circumstances exist on the site? <u>Yes</u> No	Community ID: <u>N/A</u>
Is the site significantly disturbed (Atypical Situation)? <u>Yes</u> No	Transect ID: <u>C</u>
Is the area a potential Problem Area? <u>Yes</u> No	Plot ID: <u>C3</u>
(if needed, explain on reverse)	

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
<i>Sapium sebiferum</i>	Herb	FAC			
<i>Toxicodendron radicans</i>	Herb	FAC			
<i>Parthenocissus quinquefolia</i>	Herb	FAC			
<i>Iva frutescens</i>	Shrub	FACW+			
<i>Myrica cerifera</i>	Shrub	FAC+			
Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-)			<u>5/5 = 100%</u>		
Remarks:					

HYDROLOGY

<p>Recorded Data (Describe in Remarks):</p> <p><input type="checkbox"/> Stream, Lake, or Tide Gauge</p> <p><input type="checkbox"/> Aerial Photographs</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> No Recorded Data Available</p>	<p>Wetland Hydrology Indicators:</p> <p>Primary Indicators:</p> <p><input type="checkbox"/> Inundated</p> <p><input checked="" type="checkbox"/> Saturated in Upper 12 in.</p> <p><input type="checkbox"/> Water Marks</p> <p><input type="checkbox"/> Drift Lines</p> <p><input type="checkbox"/> Sediment Deposits</p> <p><input type="checkbox"/> Drainage Patterns in Wetlands</p> <p>Secondary Indicators (2 or more required):</p> <p><input type="checkbox"/> Oxidized Root Channels in Upper 12 in.</p> <p><input checked="" type="checkbox"/> Water-Stained Leaves</p> <p><input type="checkbox"/> Local Soil Survey Data</p> <p><input checked="" type="checkbox"/> FAC-Neutral Test</p> <p><input type="checkbox"/> Other (Explain in Remarks)</p>
<p>Field Observations:</p> <p>Depth of Surface Water: <u>none</u> (in.)</p> <p>Depth to Free Water in Pit: <u>16</u> (in.)</p> <p>Depth to Saturated Soil: <u>3</u> (in.)</p>	
Remarks: Recent heavy rains.	

SOILS

Map Unit Name (Series and Phase): <u> N/A </u>		Drainage Class <u> N/A </u>			
Taxonomy (Subgroup): <u> N/A </u>		Field Observations Confirm Mapped Type? <u> N/A </u>			
Profile Description:					
Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-1	O	7.5 YR 2.5/1			Organic silt
1-6*	A	7.5 YR 5/6	N 7/ -	~10%, <7 mm	Sandy loam
6-16	A	N 5/ -			Sandy clay
Hydric Soil Indicators:					
<input type="checkbox"/>	Histosol	<input type="checkbox"/>	Concretions		
<input type="checkbox"/>	Histic Epipedon	<input type="checkbox"/>	High Organic Content in Surface Layer in Sandy Soils		
<input type="checkbox"/>	Sulfidic Odor	<input type="checkbox"/>	Organic Streaking in Sandy Soils		
<input type="checkbox"/>	Aquic Moisture Regime	<input type="checkbox"/>	Listed on Local Hydric Soils List		
<input type="checkbox"/>	Reducing Conditions	<input type="checkbox"/>	Listed on National Hydric Soils List		
<input checked="" type="checkbox"/>	Gleyed or Low-chroma Colors	<input type="checkbox"/>	Other (Explain in Remarks)		
Remarks: NRCS Soil Survey not readily available during site visit and not deemed to be highly accurate because historical aerial photographs indicate a majority of this area had been altered with fill material in the 1950s. 1-6 inch interval 50% matrix, 50% mottled					

WETLAND DETERMINATION

Hydrophytic Vegetation Present?	<u>Yes</u>	No	
Wetland Hydrology Present?	<u>Yes</u>	No	
Hydric Soils Present?	<u>Yes</u>	No	Is this Sampling Point within a Wetland? <u>Yes</u> No
Remarks:			

DATA FORM
ROUTINE WETLAND DETERMINATION
(1987 ACOE Wetlands Delineation Manual)

Project/Site: <u>Area of Concern 721</u>	Date: <u>7-01-04</u>
Applicant/Owner: <u>Naval Facilities Engineering Command</u>	County: <u>Charleston</u>
Investigator: <u>Alex Bartos and Gary Benfield</u>	State: <u>South Carolina</u>
Do Normal Circumstances exist on the site? <u>Yes</u> No	Community ID: <u>N/A</u>
Is the site significantly disturbed (Atypical Situation)? <u>Yes</u> <u>No</u>	Transect ID: <u>D</u>
Is the area a potential Problem Area? (if needed, explain on reverse)	Plot ID: <u>D1</u>

VEGETATION

Dominant Plant Species	Stratum	Indicator	Dominant Plant Species	Stratum	Indicator
<i>Ampelopsis arborea</i>	Herb	FAC+			
<i>Rubus trivialis</i>	Herb	FAC			
<i>Parthenocissus quinquefolia</i>	Herb	FAC			
<i>Myrica cerifera</i>	Shrub	FAC+			
<i>Salix babylonica</i>	Tree	FACW			
<i>Sapium sebiferum</i>	Tree	FAC			
Percent of Dominant Species that are OBL, FACW or FAC (excluding FAC-)			<u>6/6 = 100%</u>		
Remarks:					

HYDROLOGY

<p>Recorded Data (Describe in Remarks):</p> <p><input type="checkbox"/> Stream, Lake, or Tide Gauge</p> <p><input type="checkbox"/> Aerial Photographs</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> No Recorded Data Available</p>	<p>Wetland Hydrology Indicators:</p> <p>Primary Indicators:</p> <p><input type="checkbox"/> Inundated</p> <p><input type="checkbox"/> Saturated in Upper 12 in.</p> <p><input type="checkbox"/> Water Marks</p> <p><input type="checkbox"/> Drift Lines</p> <p><input type="checkbox"/> Sediment Deposits</p> <p><input type="checkbox"/> Drainage Patterns in Wetlands</p> <p>Secondary Indicators (2 or more required):</p> <p><input type="checkbox"/> Oxidized Root Channels in Upper 12 in.</p> <p><input type="checkbox"/> Water-Stained Leaves</p> <p><input type="checkbox"/> Local Soil Survey Data</p> <p><input checked="" type="checkbox"/> FAC-Neutral Test</p> <p><input type="checkbox"/> Other (Explain in Remarks)</p>
<p>Field Observations:</p> <p>Depth of Surface Water: <u>none</u> (in.)</p> <p>Depth to Free Water in Pit: <u>none</u> (in.)</p> <p>Depth to Saturated Soil: <u>none</u> (in.)</p>	
Remarks: Recent heavy rains.	

SOILS

Map Unit Name (Series and Phase): <u> N/A </u>		Drainage Class <u> N/A </u>			
Taxonomy (Subgroup): <u> N/A </u>		Field Observations Confirm Mapped Type? <u> N/A </u>			
Profile Description:					
Depth (inches)	Horizon	Matrix Color (Munsell Moist)	Mottle Colors (Munsell Moist)	Mottle Abundance/Contrast	Texture, Concretions, Structure, etc.
0-2	O	10 YR 2/1			Organic
2-8	A	10 YR 2/1			Silty loam
8-16	A	2.5 YR 4/1	10 R 4/6	~30%, <10mm	Sandy loam
Hydric Soil Indicators:					
<input type="checkbox"/>	Histosol	<input type="checkbox"/>	Concretions		
<input type="checkbox"/>	Histic Epipedon	<input type="checkbox"/>	High Organic Content in Surface Layer in Sandy Soils		
<input type="checkbox"/>	Sulfidic Odor	<input type="checkbox"/>	Organic Streaking in Sandy Soils		
<input type="checkbox"/>	Aquic Moisture Regime	<input type="checkbox"/>	Listed on Local Hydric Soils List		
<input type="checkbox"/>	Reducing Conditions	<input type="checkbox"/>	Listed on National Hydric Soils List		
<input checked="" type="checkbox"/>	Gleyed or Low-chroma Colors	<input type="checkbox"/>	Other (Explain in Remarks)		
Remarks: NRCS Soil Survey not readily available during site visit and not deemed to be highly accurate because historical aerial photographs indicate a majority of this area had been altered with fill material in the 1950s.					

WETLAND DETERMINATION

Hydrophytic Vegetation Present?	<u>Yes</u>	No	
Wetland Hydrology Present?	Yes	<u>No</u>	
Hydric Soils Present?	<u>Yes</u>	No	Is this Sampling Point within a Wetland? Yes <u>No</u>
Remarks:			























LEGEND

Arsenic Sediment Sample Results

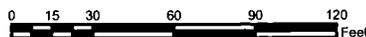
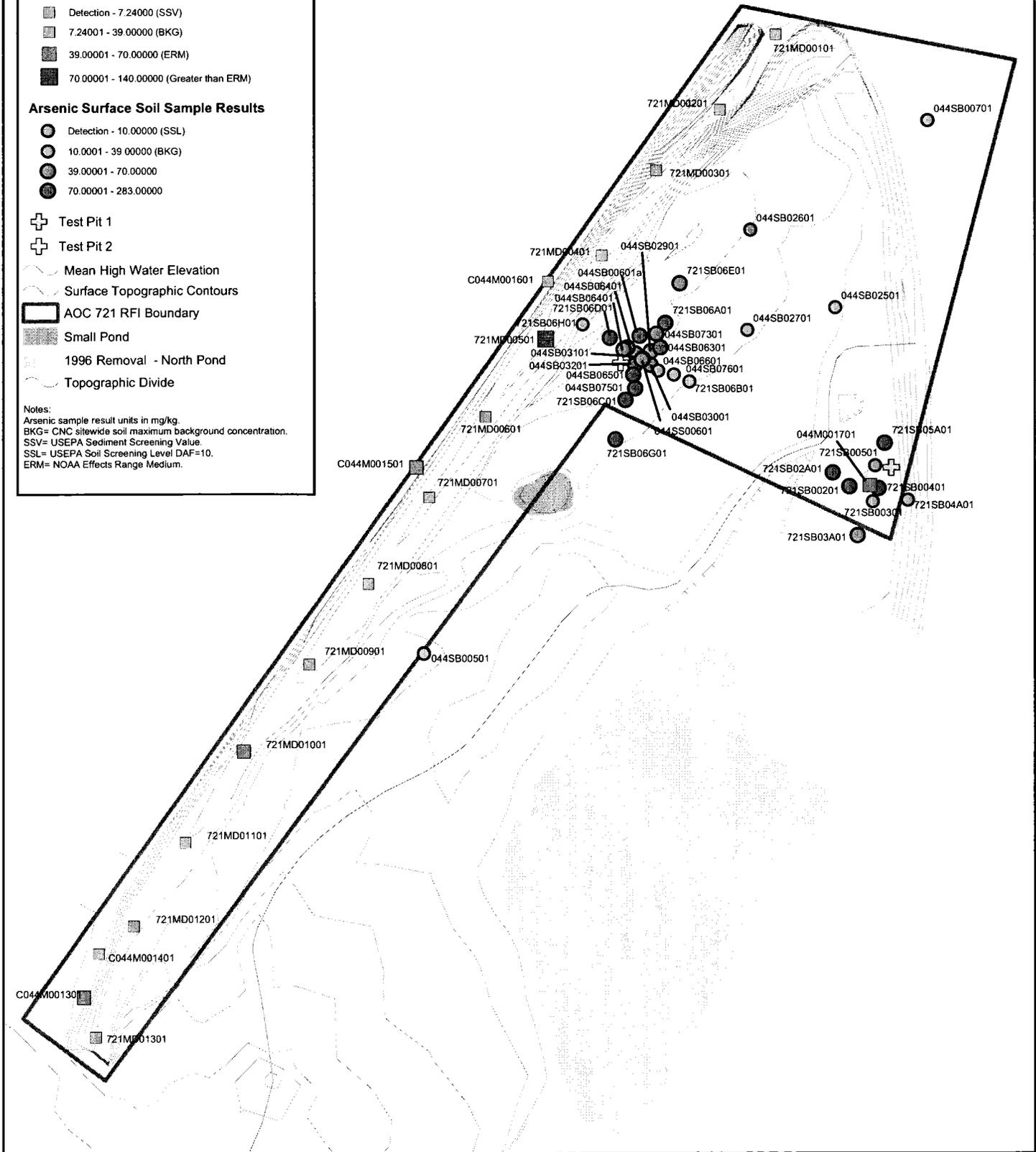
- Detection - 7.24000 (SSV)
- 7.24001 - 39.00000 (BKG)
- 39.00001 - 70.00000 (ERM)
- 70.00001 - 140.00000 (Greater than ERM)

Arsenic Surface Soil Sample Results

- Detection - 10.00000 (SSL)
- 10.0001 - 39.00000 (BKG)
- 39.00001 - 70.00000
- 70.00001 - 283.00000

- ⊕ Test Pit 1
- ⊕ Test Pit 2
- ~ Mean High Water Elevation
- ~ Surface Topographic Contours
- ▭ AOC 721 RFI Boundary
- Small Pond
- 1996 Removal - North Pond
- ~ Topographic Divide

Notes:
 Arsenic sample result units in mg/kg.
 BKG= CNC sitewide soil maximum background concentration.
 SSV= USEPA Sediment Screening Value.
 SSL= USEPA Soil Screening Level DAF=10.
 ERM= NOAA Effects Range Medium.



AOC 721
RCRA Facility Investigation Report
Charleston Naval Complex
Charleston, South Carolina

Figure A
Sediment and Surface Water Sample
Arsenic ERM Exceedances

Date: 1/23/04 Drawn by: CT File: sd-ss-arsenic.mxd

AOC 721 - Wetland Assessment

On December 8, 2003, EnSafe wetland scientists Gary Benfield and Jay Cornelius visited Area of Concern (AOC) 721 in Zone C at the Charleston Naval Complex to determine the extent of wetlands at the site. During the site visit, soil across the majority of the site was visibly saturated and water was standing in many areas. Based on the findings at the site it was determined that the source for the water was from two primary sources: (1) groundwater was visible seeping into the test pits at about 12 inches below land surface and (2) the cattail pond currently drains to the north – northwest across AOC 721 toward Noisette Creek. The wetland determinations included in this report were made following methods laid out in the US Army Corps of Engineers Wetlands Delineation Manual (ACOE 1987).

Approximately six test pits (including two in the area of the highest surface soil contamination) across the site confirmed the presence of both hydric soil and wetland hydrology. The upper horizon (0 to 6 inches) was highly organic, with heavy iron staining in the deeper zone (16 to 18 inches). Subsurface soils in areas along the eastern portion of the site, near the railroad, were light tan sand with iron staining and were quickly inundated with several inches of water seeping in from the sides. Subsurface soil in the central portions of the site was a mottled black and gray sandy clay and also were inundated, but to a lesser degree due to the clayey soil. Photographs of two test pits collected in the two areas of concern (areas with highest sample density) are included in the photo log attached to this report.

The test pits dug across the site were primarily located above the mean high tide mark as indicated in the figures of the AOC 721 Work Plan (EnSafe 2003). The area around test pit 1 was certainly a predominantly fresh water wetland with little influence from tides from Zone J water bodies. Based on the hydrology, soil type, and vegetation observed at the AOC, EnSafe concluded that wetlands are present across the entire site and prior to activities which may impact or disturb these wetlands, a permit would be required, regardless of the wetland origins (manmade vs. naturally occurring). Special controls would also be necessary to prevent impact to the adjacent Noisette Creek.

Having manmade hydrologic barriers (the abandoned road and railway) to the east and west, surface water flowing across the site is essentially funneled across the site and discharges to Noisette Creek. In addition to tidal inundation from Noisette Creek, the site also appears to receive input from the large wetland immediately to the southeast, keeping the site inundated long enough to establish wetlands.

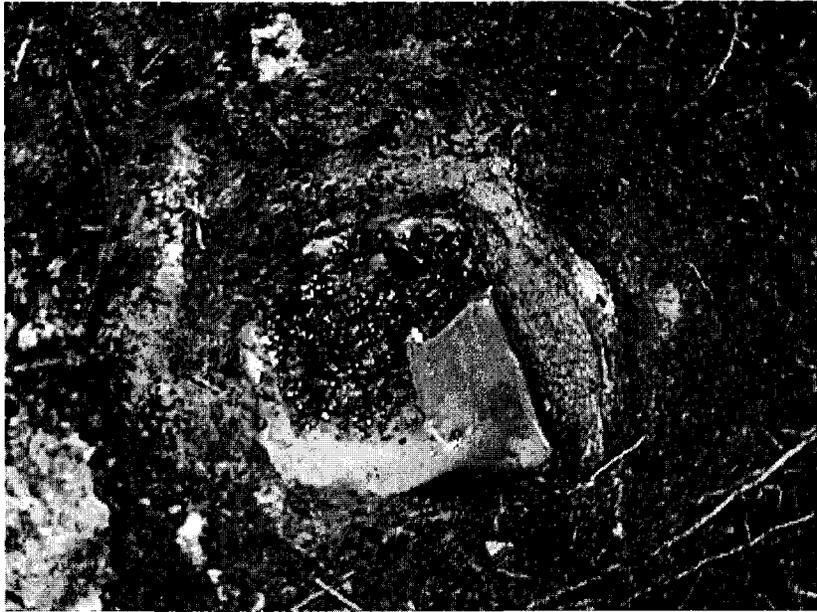
If any excavation of contaminated media is intended, it may be possible for such activity to be permitted under the Clean Water Act's nationwide permit program, specifically. *Nationwide Permit 38 - Cleanup of Hazardous and Toxic Waste*. This permit requires only that the applicant properly notify the Corps of Engineers and the impacted wetlands are delineated.

PHOTO LOG

Photographs taken during Wetland Identification

**AOC 721
December 8, 2003**

PHOTO NO. 1:



Test pit #1, dug in the south west corner of AOC 721. Water that seeped into the whole from the side walls of the pit can be seen in the bottom of the whole. GPS coordinates for test pit is: N 32 ° 52.338', W 079° 58.419' at an altitude of 49 feet above mean sea level.

PHOTO NO. 2:



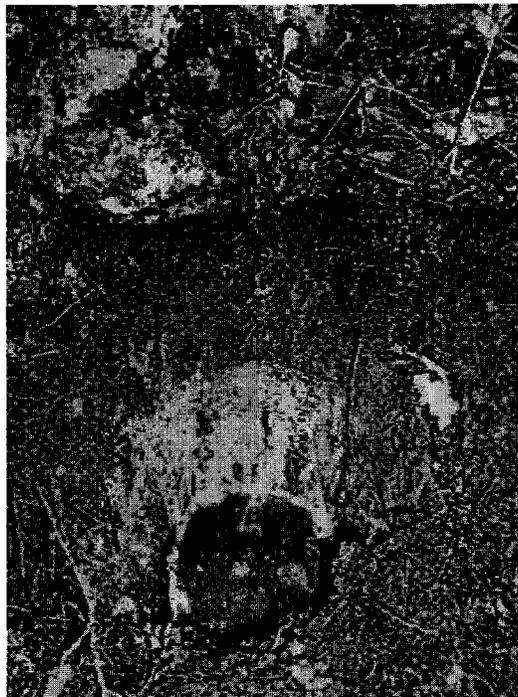
Soil profile from Test pit #1, notice grey soil color and mottled appearance of soils.

PHOTO NO. 3



Vegetation around test pit #1 is a dense thicket dominated by *Myrica cerifera* (wax myrtle).

PHOTO NO. 4



Test pit 2 dug in the south east corner of AOC 721. Water can be seen in the bottom of the whole that seeped from the side walls of the test pit. GPS location for this test pit is
N 32 \square 52.337' , W079 \square 58.435' at an altitude of 34 feet above mean sea level.

PHOTO NO. 5



Soil profile from test pit # 2. Soil was saturated at surface in area dominated by a grass species.

PHOTO NO. 6



Grassy vegetation located in area where test pit 2 was dug.



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December 16, 2003

Mr. Rob Harrell
SOUTHNAVFACENCOM
PO BOX 190010
NORTH CHARLESTON SC 29419-9010

RE: AOC 721 - Wetland Assessment

Dear Rob:

On December 8, 2003, EnSafe wetland scientists Gary Benfield and Jay Cornelius visited Area of Concern (AOC) 721 in Zone C at the Charleston Naval Complex to determine the extent of wetlands at the site. During the site visit, soil across the majority of the site was visibly saturated and water was standing in many areas. Based on the findings at the site it was determined that the source for the water was from two primary sources: (1) groundwater was visible seeping into the test pits at about 12 inches below land surface and (2) the cattail pond currently drains to the north – northwest across AOC 721 toward Noisette Creek. The wetland determinations included in this report were made following methods laid out in the US Army Corps of Engineers Wetlands Delineation Manual (ACOE 1987).

Approximately six test pits (including two in the area of the highest surface soil contamination) across the site confirmed the presence of both hydric soil and wetland hydrology. The upper horizon (0 to 6 inches) was highly organic, with heavy iron staining in the deeper zone (16 to 18 inches). Subsurface soils in areas along the eastern portion of the site, near the railroad, were light tan sand with iron staining and were quickly inundated with several inches of water seeping in from the sides. Subsurface soil in the central portions of the site was a mottled black and gray sandy clay and also were inundated, but to a lesser degree due to the clayey soil. Photographs of two test pits collected in the two areas of concern (areas with highest sample density) are included in the photo log attached to this report.

The test pits dug across the site were primarily located above the mean high tide mark as indicated in the figures of the AOC 721 Work Plan (EnSafe 2003). The area around test pit 1 was certainly a predominantly fresh water wetland with little influence from tides from Zone J water bodies. Based on the hydrology, soil type, and vegetation observed at the AOC, EnSafe concluded that wetlands are present across the entire site and prior to activities which may impact or disturb these wetlands, a permit would be required, regardless of the wetland origins (manmade vs. naturally occurring). Special controls would also be necessary to prevent impact to the adjacent Noisette Creek.

Having manmade hydrologic barriers (the abandoned road and railway) to the east and west, surface water flowing across the site is essentially funneled across the site and discharges to

Noisette Creek. In addition to tidal inundation from Noisette Creek, the site also appears to receive input from the large wetland immediately to the southeast, keeping the site inundated long enough to establish wetlands.

If any excavation of contaminated media is intended, it may be possible for such activity to be permitted under the Clean Water Act's nationwide permit program, specifically. *Nationwide Permit 38 - Cleanup of Hazardous and Toxic Waste*. This permit requires only that the applicant properly notify the Corps of Engineers and the impacted wetlands are delineated.

Sincerely,

A handwritten signature in cursive script that reads "Charlie Vernoy".

Charlie Vernoy
Task Order Manager
EnSafe Inc.