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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL REVIEW OF ENVIRONMENTAL BASELINE SURVEY FOR
TRANSFER FINDING OF SUITABILITY TO TRANSFER (FOST) FOR EDC PHASE I PARCELS
CNC CHARLESTON SC
06/01/2000
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

D H E C



PROMOTE PROTECT PROSPER

2600 Bull Street
Columbia, SC 29201-1708

June 1, 2000

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Henry Shepard II, P.E.
Caretaker Site Office
NAVFACENCOM, Southern Division
Post Office Box 190010
North Charleston, South Carolina 29419-9010

Re: Environmental Baseline Survey for Transfer/Finding of Suitability to Transfer
(FOST) for EDC Phase I Parcels
Charleston Naval Complex - SC0 170 022 560
Dated April 2000

CERTIFIED MAIL



Water Monitoring and
Protection Division

Dear Mr. Shepard:

The South Carolina Department of Health and Environmental Control (Department) has reviewed the referenced document. Based on this review, the Department has generated comments and concerns that have been attached for your information. It should be noted that some of these comments and concerns were included in a previous review of this document and that adequate responses were not included in this revision.

Because of these concerns, the Department does not concur with the transfer of the following parcels:

	The Annex Area		
12-A	Public Works Office	12-B	Public Works Office
NS-32	D. & T. Personnel Barracks	NS-43	Enlisted Men's Barracks
NS-46	Naval Station Headquarters Building	X-56	Ammunition Storage
65	Barracks	NS-66	Barracks
83	Business Opportunity Center	178	Steam Flow Meter House
214	Filter House for Facility 184	245	Fire Station Support Bldg
334	Concrete Ramp	513	RR Track Scales
668	Barracks	669	Barracks
670	Racquet & Fitness Center	1070	Haz Flammable Storage Bldg
1448	Filter House for Facility NS-59	1501	Warehouse
1509	Storage	1622	Polaris Materials Office Warehouse
1514	Pumping Station	1623	Polaris Material Office Warehouse
1632	Storage Warehouse	1634	Band Saw Shelter
1656	Transit Cargo Handling Warehouse	2501	Radar Lounge
OL-1	Open Land Area	SCEG	Storage Yard.

H.Shepard
FOST/EDC Phase I - CNC
June 1, 2000
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Additionally, the Department has concerns with the sanitary sewer system, stormwater management system, and railroad system that transect the tract. This system is identified as Zone L for which an RCRA Facility Investigation has not been completed (i.e. the nature and extent of any existing contamination has not been delineated).

The Department concurs with the transfer of the remaining parcels in the tract. However, please be advised that this approval is based on the information available at this time. If additional information becomes known and if a determination is made that additional action is required, then as provided by law the Navy is responsible.

To facilitate future FOST reviews, the Navy should provide adequate responses to the Department's comments and concerns. The FOST review and approval process can be improved by following the technical recommendations of the Department.

Should you have questions or require additional information, please contact Melissa King at (803) 896-4218.

Sincerely,

Robert W. King, P.E.
Assistant Deputy Commissioner
Environmental Quality Control

RWK:MJK/mjk

attachments: May 31, 2000 Memorandum (Bristol to King)
May 26, 2000 Memorandum (Preston to King)
June 1, 2000 Memorandum (Mehta to King)

cc: Dann Spariosu, EPA
Mihir Mehta, BLWM/SCDHEC
Paul Bergstrand, BLWM/SCDHEC
Melissa King, BLWM/SCDHEC
Heather Preston, BA/SCDHEC
Paul Bristol, BW/SCDHEC
Tony Hunt, SOUTHDIV/Navy
Dean Williamson, CH2MHill/Jones
Rick Richter, Trident/SCDHEC



Memorandum

Date: 31 May 2000

To: Melissa King
Bureau of Land and Waste Management

From: Paul L. Bristol *JL for RLB*
Bureau of Water

Re: Environmental Baseline Survey For Transfer
EDC Phase I Parcels
Charleston naval Complex
Charleston, SC
Charleston County

The author has completed technical review of the referenced document with regard to petroleum storage sites. As submitted, the document addresses concerns previously identified by the author (memorandum Bristol to Mehta, 28 January 2000). No additional comments have been generated by this review. With this consideration, the author concurs with the conclusions concerning environmental condition of property classifications, as detailed in section 2.4, for those sites known or suspected of storing and/or utilizing petroleum products on site.

Should you have any questions I may be reached at 898-3559 or e-mail @bristolpl.



TO : Melissa J. King, P.E.
DoD Site Coordinator/ BLWM

FROM: Heather Preston *JH for AR*
Bureau of Air Quality

DATE: May 26, 2000

RE: **Comments on the Finding of Suitability to Transfer (FOST) for the Charleston Naval Complex**

Asbestos

Several asbestos surveys have been conducted at the base in the past and many of the facilities on the base have asbestos warning signs posted. The narrative describes the surveys as "limited in nature and should not be taken as a comprehensive study of the subject facilities." Furthermore, no surveys were conducted to support the Environmental Baseline Survey Transfer (EBST).

From our perspective, the obvious concern would be that if these buildings are going to be renovated for future use or demolished, that they be done so in accordance with the National Emission Standards for Hazardous Air Pollutants, 40 CFR 61 Subpart M, and DHEC regulations 61-86.1.

Chlorine Gas and the Chemical Accident Prevention Provisions (112r)

Facility numbers 214 and 1448 were used in the past as filter houses for a swimming pool and a bathhouse respectively. Both facilities contained chlorine gas and still contain the gas tanks. Whether those tanks are empty or not is unclear. The threshold limit for facilities subject to the requirements of R.61-62.68, Chemical Accident Prevention Provisions (112r), for chlorine is 2,500 lbs and as these appear to be fairly large tanks, there is the potential that these facilities could be subject to the 112r regulations. Furthermore, the conditions that the tanks are being stored in are less than ideal. The narrative describes facility number 1448 as follows, "Chlorine tanks are present and standing water covers the entire floor." Facility number 214 is not described in this manner, but a picture clearly shows that the tanks are also standing in water.

Boilers

Numerous boilers are in buildings scattered around the base. Some of the boilers are in use; others are not. The only boiler that is permitted by the Bureau of Air Quality is a natural gas boiler located at facility number 1079. This boiler is apparently no longer in use. Our concern would be that if that if the ownership of this facility is transferred, that the new owner be made aware of the permit and the permit conditions. Finally, as no information is given concerning the other boilers, it is difficult to assess if they require permits. Thus, the new owner should be made aware of the potential for permitting requirements for these boilers.



2600 Bull Street
Columbia, SC 29201-1708

MEMORANDUM

TO: Melissa King, P.E., DoD Site Coordinator
Corrective Action Engineering Section
Division of Hazardous and Infectious Waste
Bureau of Land and Waste Management

FROM: Mihir Mehta, Project Engineer *mhm*
Corrective Action Engineering Section
Division of Hazardous and Infectious Waste
Bureau of Land and Waste Management

DATE: June 1, 2000

RE: Charleston Naval Complex (CNC)
South Carolina
SCO 170 022 560

Draft Environmental Survey for Transfer and Draft Finding of Suitability to Transfer for the EDC Phase I Parcels, Charleston Naval Complex, SCO 170 022 560, Revision 1.0, dated April 2000, received May 4, 2000.

The South Carolina Department of Health and Environmental Control (Department) has reviewed the above referenced documents according to applicable State and Federal Regulations. The attached comments were generated based on this review.

South Carolina Department of Health and Environmental Control comments on: Draft Environmental Survey for Transfer and Draft Finding of Suitability to Transfer for the EDC Phase I Parcels, Charleston Naval Complex, SCO 170 022 560, Revision 1.0, dated April 2000, received May 4, 2000.

Comments By Mihir Mehta:

1. Section 5.0.

This section provides very general information regarding the past use/operation of the property to be transferred. One of the criteria for identifying the "uncontaminated parcel of land" per EPA guidance is to have a complete understanding of its past operation or use. Therefore, please provide a detail discussion for the operation of the buildings and spills or accidents that may have temporarily released contaminants into the surrounding media. This comment was previously submitted. The Navy has revised the document but the information provided does not clearly indicate or detail the past and current use.

For example: Page 5-8. Facility #2501 is labeled as "Radar Lounge". The past use is indicated as handling and storing the gasoline, oil, and detergent. Current use "not observed" due to presence of asbestos. What is the condition of facility 2501 with respect to environmental risk/hazard? Without this information the Department cannot concur with the transfer of this facility.

For example: Building 245. What are the miscellaneous chemicals being stored currently? Also, state the releases from the past activities. Navy's response that material were stored does not mean that there was a release has merits only if the past use records are available due the industrial nature of the operations. Without further information the Department cannot concur with the transfer of this building.

2. Section 5.0.

Page 5-9. Facility: Open Land Area (OL-1). Past use indicates that 55-gallon drums were abandoned in this area. The Department has never been notified nor informed of such activities in this area. Has this area been investigated? Have the drums been removed? Was there a release of contaminants from these drums? What is the current condition of the property? Please address this concern as deemed appropriate.

3. Section 5.0. Findings for Subject Property.

As written this section does not provide any information or details regarding the past history of use or operation (with respect to releases, spills, or accidental environmental impact) and no data has been collected (and if collected and analyzed not presented) to show that there is no threat to human health and the environment. Per EPA guidance and CERCLA 120 (h) (4) the above stated information is necessary for concurring with the proposal that the referenced parcel of land is uncontaminated. Table 5-10; page 5-44 in this section lists only PCB related spills. All releases and spills should be identified and also state its current condition with respect to environmental risk/hazard.

Facility 1509: Paint, used oil and Varsol cleaner. What is the past use and was there a release? The facility is currently used by tenant but Navy should provide the past use and conditions.

Facility 669 and 668 (barracks): This section indicates that a release had occurred and the remediation is unknown. What is the release about? What was the response action and was it appropriate for unrestricted land use? The Department does not concur with the property transfer based on the information provided.

Facility NS 43 and NS 46: This section indicates that the remediation has occurred. What was the problem and how was it remediated is not mentioned. The Department has not seen any documentation related to this incident. The Department does not concur with the property transfer based on the information provided.

Facility 670 (Racquet and Fitness Center): Based on the information provided in the table the two reported releases of 100 and 500 gallons of PCB containing fluid occurred. The spill was remediated. The Department has not reviewed nor approved any such remediation proposal. What was the remediation goal? What is the current condition of the property? The release has occurred and therefore, it should not be classified as uncontaminated property without the Departments approval. The Department does not concur with the property transfer based on the information provided.

4. Section 5.3.

Provide a single map or a figure that adequately shows the location of the parcel of land to be transferred with respect to SWMUs and AOCs adjacent to or in the vicinity (as listed in Table 5-2) and their association as deemed appropriate. This information was requested during the review of the previous version of the document.

5. Section 5.0.

The Department had previously requested (comment #12) that the Navy provide adequate information for the facilities listed in Table 5-1. The following are few examples noting the Departments specific concerns. Please revisit the buildings listed in this table to be transferred under the referenced FOST.

Facility 1509. It is stated that the building was used for storage in the past and currently is used for maintenance and storage for paint, used oil, and varsol parts cleaner. The Navy's response was, "The materials are related to current tenant activities. No action is warranted." The Department does not agree with this response. According to the EBS Section B the building was constructed and used as a warehouse since 1963. Therefore, the past use of the facility by the Navy indicates that there could be a possibility to contaminant release or spill. The Navy may not have complete records for the industrial operations conducted at this facility and therefore, cannot transfer all the liability to the current tenant activities.

Facility 1656. It is stated that the building was used as transit cargo handling warehouse (oil,

antifreeze, commercial cleaners, solvents, and petroleum products) in the past and currently is used as maintenance garage for new and used oil, hydraulic fluid, and acetylene canisters. The Navy's response was, "The materials are related to current tenant activities. No action is warranted." The Department does not agree with this response. The past use of the facility by the Navy indicates that there could be a possibility to contaminant release or spill. The Navy may not have complete records for the industrial operations conducted at this facility and therefore, cannot transfer all the liability to the current tenant activities. Also, according to the EBS (1995) an oil water separator was noted at this facility

6. Section 5.18. Wetlands.

Please provide a map or a figure that would show all wetlands in and around the EDC phase I land parcel and how are the associated. This comment was previously submitted to the Navy. The Navy's response is to reference another document to address this comment. The Department does not agree with the response and would prefer the information as requested as a part of this document. The information requested is helpful to correlate the proposed property to be transferred with any wetlands nearby.

7. Section 6.0; Findings for Adjacent Property.

This section does not present any information that would help understand the risk associated with the adjacent property and how does it relate the subject property. Please revise the entire section to include adequate information regarding the risk, hazard, or other issues related to adjacent property as deemed appropriate. This being one of the important criteria to be evaluated the Department recommends that Navy provide detail.

The Navy has revised the document but has not clearly described the risk associated with the adjacent property and how does it relate the subject property. Table 6-1 on page 6-2 provides current status of the RFI Reports.

It states that for some Zones the Draft RFI report submitted to DHEC. The Department has no Zone RFI Reports pending review except Zone H RFI Report Addendum that was submitted last week. Therefore, the table should be revised to state the current status of the RFI reports.

Also, this table does not provide any information related to the nature and extent of contamination (soils, groundwater, and/or surface water), risk/hazard associated with it, and any corrective action if conducted. The goal is not to know the status of RFI reports but to provide the information as stated in this comment.

8. Please see the comments: Memo. From Paul Bergstrand to Mihir Mehta, dated May 31, 2000.

MEMORANDUM

TO: Mihir Mehta, Environmental Engineer Associate
Corrective Action Engineering Section
Hazardous and Infectious Waste Management
Bureau of Land and Waste Management

FROM: Paul M. Bergstrand, P.G., Hydrogeologist
Hazardous Waste Section
Division of Hydrogeology
Bureau of Land and Waste Management



DATE: 31 May 2000

RE: Charleston Naval Base (CNAV)
Charleston County, South Carolina
SC0 170 022 560

Draft EBST Report
EDC I
Dated April 2000, Revision 0

The materials referenced above have been reviewed with respect to the requirements of R.61-79 of the South Carolina Hazardous Waste Management Regulations, The Environmental Protection Agency's (EPA) RCRA Facility Investigation Guidance Document dated May 1989, the EPA Region IV Environmental Compliance Branch Standard Operating Procedures and Quality Assurance Manual (SOP/QAM) dated May 1996, the CNAV Final Comprehensive Sampling and Analysis Plan dated 30 August 1994, CERFA 120(h) as amended, DoD FOST Guidance and EPA BRAC FOST Guidance.

The document submitted does not provide adequate support for the request of "Finding of Suitability to Transfer" for all sites or facilities listed. Comments on the Draft EBST Report are provided.

Draft EBST Report Comments
Paul M. Bergstrand
31 May 2000

Please note, previous comments, dated 24 January 2000, were provided to the Navy on a Draft EBST dated October 1999.

GENERAL COMMENTS

1. The following comment was not adequately addressed.

3. Chapter 3 and Appendix B do not adequately identify the adjoining SWMUs and AOCs and fails to identify those sites which may pose a risk to the facilities being transferred. This information should be revised.

The response to comments stated "This information does not need to be included in Chapter 3 or Appendix B". Chapters 3, 5 and 6 and Appendix B do not adequately communicate risks from nearby SWMUs and AOCs to the facilities being transferred. In regards to the SWMUs and AOCs within Zones where the RFI Report is not complete, risk levels should be considered as unknown. Risk information should be included in the final document.

2. The following comment was not adequately addressed.

4. Tables 1-1, 5-2 and 7-1 describe the Last Use of the facility but not the actual former use of the buildings or the property during Navy control of the property. This information should be revised.

The response to comments states "No revisions will be made". A description of all prior use and activity in the buildings or on the land during Navy control of the property should be included in the final document. Examples of this information include dredge fill materials found in Zones B, C, H and I, a pistol range and explosives storage in Zone H.

3. The following comment was not adequately addressed.

8. *Numerous facilities in this document are associated with RFI investigations which have not been completed. Facilities such as warehouses, storage yards and piers are surrounded by rail lines and all facilities are associated with sewer lines. How this data was considered and evaluated should be included.*

How the RFI data from incomplete reports was considered and evaluated should be included in the final document.

4. The following comment was not adequately addressed.

9. *Zone J data relating to exceedences in Noisette Creek and the surrounding facilities has not been accounted for. How this data was considered and evaluated should be included.*

The response to comments stated "These areas are not included in EDC Phase I. No evaluation is warranted." Because of the incompleteness of the Zone J RFI, the Navy has not demonstrated the sewer lines are not the associated with these exceedences. How this data was considered and evaluated should be included in the final document.

SPECIFIC COMMENTS.

5. The response to the following comment did not address the questions.

13. *Building NS-46, Page 3-4*

This building has an armory in the northeast corner. An armory would have potentially utilized solvents and petroleum products. Also, this armory has a sink and toilet which waste solvents and petroleum products may have been disposed. This issue was identified in the March 1999 site visit. The armory has not been identified as a SWMU or an AOC and has not been investigated in the RCRA Process.

It should also be noted that the Navy Base did not develop a sanitary sewer system until the 1970's. All liquid waste disposed of in sinks, floor drains, or storm drains prior to this time was

directly discharged into the nearest waterways. A storm sewer line runs along Hobson, next to the armory, and discharges into the Cooper River between Piers T and U. Analytical samples collected at this discharge point and reported in preliminary Zone J document indicated VOC and SVOC constituents in sediments which could be related to the armory.

The Navy has not provided any proof or evidence the armory has or has not been the source of a spill or release to the environment. This area of the building should be considered as a SWMU or AOC and investigated as such. This building should be removed from the EDC I until the armory is documented and properly investigated.

6. The following comment has not been resolved.

18. *Facility 334, Page 3-12*

The description states the Navy built a seaplane ramp in 1972. This description is not clear since the last Navy seaplane made it's last flight in 1967. Furthermore a seaplane would require some additional facilities such as tie-down, fueling, etc. which do not appear to be present. It is possible that this structure was constructed just as a boat ramp. The response to comments, however, state that "tanks were located adjacent to Facility 334". This is new information and there is no evidence or documentation the tanks, if present, were assessed or removed. This facility should be removed from the EDC Phase I until these issues are resolved.

7. The following comment was not adequately addressed.

19. *Facility 513, Page 3-13*

This section describes a catch basin as part of the railroad track scales. Other sections of the report indicate an oil water separator is also part of this facility. There has not been any indication this OWS was identified or investigated as a SWMU or AOC. This facility should be removed from the EDC I until this information is provided.

The response to comments stated "It has been determined that the text mis-stated the presence of an Oil/Water Separator at this facility. The structure described is actually a sump. The text of the EBST and FOST have been modified accordingly. No further investigation is

warranted.” The incomplete Zone L RFI Report ,which was intended to investigate potential spills or released along rail lines, did not include this structure. The simple fact that a sump was installed indicate previous uncontrolled releases occurred in this area. This facility should be removed from the EDC Phase I until the site is investigated.

8. The following comment was not adequately addressed.

20. Building 1079, Page 3-17

This facility is reported to have 5 AST “Holding Tanks” that have stains under the tanks. Other sections of this report fail to mention the tanks. It also appears the tanks have not been identified or investigated as a SWMU or AOC. This facility should be removed from the EDC I until this information is provided.

The sheet for building 1079 in Appendix B states “According to facility records, a few minor spills have occurred and remediation was conducted immediately.” And “ Floor drains observed throughout the building lead to five separate holding tanks. The 500 gallon holding tanks were used to catch spills. Floor stains were observed underneath holding racks.”

The response to the comment states “The EBST mentions stains under the racks, not tanks. Furthermore, there were 3 “holding tanks” that were sealed. No releases have ever been reported in association with these tanks. This facility will not be removed from EDC Phase I.” The response is not adequate for the following reasons. Spills were reported. Stains (unspecified) were reported. ASTs at the site were not reported in the EBST and were apparently not addressed by the navy Tank program. This facility should be removed from the EDC Phase I until the site is investigated and these issues are addressed.

9. The following comment has not been resolved.

21. Building 1501, Page 3-20

This building is reportedly a scrap warehouse. Table 5-6, however, indicated a waste oil AST was also a part of this facility. There has not been any indication this AST

was identified or investigated as a SWMU or AOC. This facility should be removed from the EDC I until this information is provided.

The response to comments states "The waste oil AST is associated with current tenant activities." If the current tenant has installed and is responsible for the waste oil AST, the Department can agree with the transfer. If the AST was at the facility before the tenant occupied the building the Navy has not adequately assessed the site and the facility should be removed from the EDC Phase I transfer.

10. The previous comment has not been adequately addressed.

22. *Building 1622, Page 3-23*

This building is reported in Appendix B to have had analytical data documenting a mercury spill. The report, however, was not referenced. This building was not identified or investigated as a SWMU or AOC. This facility should be removed from the EDC I until this information is provided.

The response to the comment states that "The mercury spill involved 1 teaspoon of mercury, and was remediated." It is not clear if the analytical data reported in Appendix B was collected before or after the stated spill, or before or after the stated remediation took place. Since the volume of mercury spilled appears to be known, the Navy should be able to provide documentation of the remediation and that the clean up was made to unrestricted residential land use. Without this information the Department is unable to concur with an unrestricted residential land use transfer.

11. The following comment has not been resolved.

26. *4.1 Physiography*

This would be an excellent section to provide maps representing the dredge filling of the Naval Shipyard over time.

The comment response stated "Maps will not be provided in this document". This issue is directly related to the issue of prior use of the property. There are several large areas in Zones B, C, H and I that were former dredge spoil areas that have since been built upon and are now included in

the EDC Phase I. The section of the document where the dredge spoil information is placed is not critical. The information should be included.

12. The following comment has not been resolved.

32. *Appendix B*

The following buildings or facilities should be changed from Light Green or Blue to Red. This change is because of information provided indicating that there have been releases reported, there have been no samples collected or the determination of no clean up necessary is not conclusive.

664 *Mercury in a liquid*

The response to comments states "There is no evidence that mercury was ever stored at this facility". The sheet for Facility 664 in Appendix B clearly confirm the analytical detection of mercury in two samples. This is evidence that mercury was used or stored at this facility. It is now the Navy's responsibility to confirm the presence or absence of contamination at this facility. The Department is unable to concur with an unrestricted residential land use transfer.

13. Buildings 12A and 12B, Table 5-1

The description of past use indicates paint, blasting grit and commercial cleaning supplies. The use of blasting grit would result in old paint dust and possibly the release of metals into the environment. It should be noted that the buildings have recently been used as temporary classrooms for the Charleston Magnet School. There is no evidence that samples were ever collected or analyzed from this area. It is the Navy's responsibility to confirm the presence or absence of contamination at this facility. The Department is unable to concur with an unrestricted residential land use transfer.

14. Building 1656, Appendix B

The sheet for this building indicates the presence of an oil water separator which has not been investigated. If this separator was installed before the the current tenant occupied the building, the facility should be removed from the EDC Phase I until the site is investigated.

15. EDC Phase I Map, Southern Portion, Charleston Naval Complex

There is a small area within the footprint of building NS-46 that is not included in the proposed transfer. The area appears to be building number 1889. No explanation is offered as to why this area is being omitted. It is not clear what mechanism will be employed to keep such a small area out of a unrestricted land use transfer. Please address.

16. EDC Phase I Map, Southern Portion, Charleston Naval Complex.

The area containing SWMU 14 and Building 1899 has been included in the proposed transfer. Please correct.