

N61165.AR.005815  
CNC CHARLESTON  
5090.3a

HAZARDOUS WASTE MANAGEMENT, WASTEWATER, AIR AND UNDERGROUND  
STORAGE TANK ENVIRONMENTAL PERMITS CNC CHARLESTON SC  
10/25/1994  
CNC CHARLESTON

ENVIRONMENTAL PERMITS  
NAVAL BASE CHARLESTON SOUTH COMPLEX

25 October 1994

*F-1 &  
CMB-Contract*

**RECEIVED**  
NOV 22 1994  
Groundwater Protection  
Division

HAZARDOUS WASTE MANAGEMENT PERMITS

Permit: SC0 170 022 560

Status: Expires 4 June 1995. Renewal required to be submitted by 4 December 1994.

Requirement: Pursuant to the requirements and conditions of the Resource Conservation and Recovery Act (RCRA), Subtitle C, permit delineates requirements for treatment, storage or disposal (TSD) facilities. TSD facilities are necessary for storage of hazardous waste for more than 90 days. The permit contains two parts, the Hazardous Waste Management and the Hazardous and Solid Waste Amendment (HSWA) portions. The Hazardous Waste Management portion of the permit regulates the "cradle to grave" disposition of hazardous waste and is issued and enforced by SCDHEC. The identification of Solid Waste Management Units (SWMU) and the RCRA Corrective Action Process is regulated under the HSWA portion and is issued and enforced by EPA. Permit conditions require investigation of releases from SWMUs resulting in remedial action to remove the contaminant or contain the release in a manner that is protective of human health and the environment.

Permit must remain active and current through the completion of the Corrective Action Process. The Navy cannot relinquish ownership until completion of all remedial action at all sites.

Additional Information: Permit conditions must be met prior to property transfer. The RCRA Facility Investigation (RFI) process will provide information relating to the existence and extent of contamination. A Corrective Measures Study (CMS) will determine how the contamination may be contained or removed efficiently. After satisfactory demonstration of the corrective or remedial action, the property may be transferred with deed restriction. Lease agreements must provide allowances for property access both by owner and regulatory agencies until remedial action is complete.

AIR PERMITS

Permit: SCDHEC Air Operating Permit #0560-0002

Status: Issued 8 Mar 1989, Expired 31 Aug 1993, Renewal Requested 17 June 1993. SCDHEC has authorized continued operation under existing permit until the renewal is issued.

Requirements: SCDHEC Regulation 62.1, Section II. Operating permit is required for existing sources of air contaminants or devices that control air contamination discharges. Each source (i.e. boiler, diesel generator, scrubber, cyclone, etc.) is given an identification number on the operating permit. SCDHEC issues one operating permit to Charleston Naval Shipyard Environmental Office for the entire Naval Base South Complex including the Naval Hospital. There are 37 separate sources permitted throughout the Naval Complex.

Permit: SCDHEC Air Construction Permits #0560-0002CC through CJ

Status: Permits have been requested but not issued. SCDHEC has indicated that construction permits will be issued when operating permit is renewed.

Requirements: Construction permits are required for any new source or device prior to beginning work. The construction permits are valid until canceled or incorporated into the operating permit.

Additional Information: Title V of the 1990 Clean Air Act Amendments requires facilities that generate air emissions to complete an application designating their facility as a major source or an area source, the difference being in quantity and type of contaminant emitted. South Carolina Air Pollution Control Regulation 61-62.60 provides the requirements for application to meet Title V Operating permit program conditions. The application for operating units must be submitted by 15 November 1995. No source may continue to operate after the application deadline submittal unless a complete application has been submitted. An application for conditional major (formerly known as "synthetic minor") is being prepared by the Charleston Naval Shipyard Environmental Office for those sources expected to be in operation by the Navy past the 15 November 1995 deadline.

The operating permit is transferable if all sources are included.

## WASTEWATER PERMITS

Permit: SC 0003816

Status: Expired 13 August 1985. SCDHEC has authorized continued operation on existing permits until renewal is issued.

Requirement: National Pollutant Discharge Elimination System (NPDES) requires permits for the discharge of pollutants from any point source into waters of the United States. NPDES permits typically contain limits on the quantities of specific pollutants which can be discharged from the individual point source. These permits contain requirements for sample collection, analysis of wastewater discharge at a specified frequency and reporting of results to permit authorities.

Additional Information: This permit covers (1) outfalls conveying water runoff from the petroleum storage areas, tank berms 39 A & D, 3900 E & F, and Chicora tank farm (FISC) and (2) the compressor house, Building 1292 (CNSY, currently not in use).

Permit: General Storm Water Discharge Application

Status: Application submitted 9 July 1992 by Chief of Naval Operations. Phase II survey and analysis were finalized in October of 1994. Results to be forwarded to EPA for recommendations.

Requirements: See requirements for permit #0003816

Additional Information: The Chief of Naval Operations has applied to EPA for a group permit for storm water discharges. Phase I and Phase II of the process which involve an assessment of potential point sources and subsequent study of effluent pollutant content and sediment quality has been completed. The next step will involve submittal of the information to EPA for permitting storm water discharges which will continue through base closure.

Permit: NCSD #008

Status: Expired 1 January 1994. Renewal is expected when NCSD receives their permit from the state. NCSD has directed the shipyard to continue operating under the existing permit until the renewal is issued.

Requirement: The North Charleston Sewer District (NCSD) permits discharges to the sanitary sewer system under its cognizance in maintaining plant effluent to meet requirements of the Clean Water Act. This permit covers discharges of the entire Naval Base South Complex.

Additional Information: Three discharge points require monitoring: the main sewer continuous discharge, the metal plating facility (Building 226) batch discharge and the FISC oil/water separator

continous discharge. A large portion of the industrial wastewater discharged from the base is covered under this permit, including a number of discharges previously routed to the Cooper River. The volume also covers wastewater from ships which is collected in the Sewage Ship Waste Offload Barges (SWOB) and tanks.

Permit: Dry Dock Discharge Permit Application

Status: Application submitted on 3 March 1992. Analytical data for dry docks 1 through 5 has been submitted to SCDHEC for review.

Requirement: See requirements for permit #0003816.

No additional information available.

## REGULATED UNDERGROUND STORAGE TANKS

Permit: Individually registered

Status: The Naval Base South Complex has 37 regulated Underground Storage Tanks (UST) that are individually registered or permitted by SCDHEC for the life of the tank.

Requirement: Subtitle I of RCRA requires development and implementation of a regulatory program for USTs containing regulated substances. A regulated substance includes any substance listed under CERCLA and petroleum substances such as crude oil, motor fuels, jet fuels, distillate fuel oils, residual fuel oils, lubricants, petroleum solvents and used oils.

All new and existing UST systems must be protected from corrosion, equipped with spill/overflow prevention equipment and equipped with an approved method of release detection. Transfer piping must be properly designed, constructed, protected from corrosion, and equipped with automatic line leak detection system.

Additional Information: Closure of an Underground Storage Tank allows temporary or permanent closure. Temporary closure requires operation and maintenance of corrosion protection and release detection measures, vent lines left open if longer than three months, and permanent closure after 12 or more months. Permanent closure requires notification of EPA and the State. Continued service to store a non-regulated substance would constitute a change in service and would require similar notification. The preferred Navy policy is to remove USTs and related systems at closure.

Of the 37 regulated tanks mentioned above, 12 have been designated out of service and will be removed within the next year; Nine these tanks meet new regulatory requirements and may be transferred to the new property owner without need for upgrade; and the remaining tanks may be left in operation. An assessment and upgrade to meet new requirements would be required by 22 December 1998.

POTABLE WATER PERMIT

Permit: #1010502

Status: Renewed yearly upon payment of fees

Requirement: SCDHEC requires application of permit for distributors of potable water.

Additional Information: The Naval Base receives potable water from the Commissioners of Public Works (Hanahan) and distributes to facilities, piers and water storage structures. In the past, Naval Base Charleston monitored for lead, copper and total coliform. On 3 December 1992, Charleston requested an exemption under 40 CFR 141.3 from these monitoring requirements. SCDHEC concurred on this exemption 8 February 1993, however Naval Base Charleston continues to perform monthly bacteria and disinfectant monitoring and maintains the results for periodic inspections by the state.

DREDGING PERMITS

Permit: #85-4D-324

Status: Army Corps of Engineers issued 6 March 1986. Expires 31 March 1996.

Requirement: Pursuant to the requirements of the Clean Water Act and the Rivers and Harbors Act, this permit authorizes work to be performed affecting the navigable waters of the United States, upon recommendation of the Army Corps of Engineers, and allows discharge of dredged or fill material into waters of the United States upon issuance of permit. The permit was obtained to allow maintenance dredging in the Cooper River in the areas of the Charleston Naval Base Complex and Naval Weapons Station. In the vicinity of the South Complex, the permit allows dredging of Shipyard River and maintains a spoil site physically on Naval Base property.

Permit: #85-4D-324

Status: SC State Budget and Control Board issued 18 June 1987. Expires 18 June 1997.

Requirement: Permit issued by the State Budget and Control Board as custodian of all public lands and waters not otherwise provided for by law as set forth in R19-450 of the Code of Laws of South Carolina. Approval is required for any construction or excavation in the navigable waters of South Carolina lying below the usual high water mark.

Additional Information: The Navy will retain ownership of both permits in order to allow continued maintenance dredging of Naval Weapons Station piers and shipping channels. Reuse scenarios presented in the Draft Environmental Impact Statement include the spoil site on the Naval Base as an asset due to limited disposal sites available.

## Charleston Naval Base Environmental Permits

Note - All permits are administered by the Shipyard Environmental Division.

### AIR PERMITS

There are 8 construction permits and one operating permit. The operating permit is valid until canceled or superseded even though it has expired. The construction permits are valid until canceled or incorporated into the operating permit. These permits identify and place monitoring and reporting requirements on 37 separate sources. These sources are summarized as follows:

Void.....	7
Naval Hospital.....	1
Barge Mounted.....	3
Boilers.....	15
Emergency Generators.....	5
Mobile Boilers.....	2
Miscellaneous (Scrubbers)...	4
TOTAL.....	37

← Two boilers backup to Foster/Wheeler

The US Clean Air Act Amendments of 1990 (specifically Title V) require that activities that are considered major sources must apply for new permits by November 15, 1995. Current plans are to obtain a separate permit for the Naval Hospital's source, transfer the barge sources to another shipyard, and non-destructively disable the other sources as they are no longer needed. The state cannot transfer ownership of portions of a permit. If a source will be needed for reuse, the new operator should obtain their own permit prior to re-enabling the source. Note that a construction permit takes at least 2 months for the state to issue, and might take that long or longer to prepare. It is possible that enough sources will be removed from the permit that the Naval Base will no longer require Title V permitting.

In addition, Foster-Wheeler holds a permit for operation of a shipyard owned backup boiler at the power house (boiler #14).

### WATER PERMITS

#### Naval Base:

The Naval Base was issued a wastewater permit that allows various point sources to be discharged into the Cooper River. The permit has expired. Renewal has been requested. In addition, a request for modification to add the drydock discharges to this permit was made in 1992. The state has issued a letter to the shipyard allowing continued operation under the existing permit. As each source is no longer needed, it will be deleted from the permit.

An application for a group storm water runoff permit was submitted in 1992. It required studies to be conducted prior to issuance. The phase I and II studies are complete. Once the phase II study is submitted, the permit could be issued by EPA.

The Naval Base has been issued a North Charleston Sewer District Permit for discharges to the sanitary sewer. This permit has also expired. Renewal has been requested, however, North Charleston cannot issue a new

permit until it receives it's permit from the state. North Charleston has directed the shipyard to continue operating under the existing permit until the new one is issued.

There are two dredging permits: one is issued by the Army Corps of Engineers and authorizes dredging at the Naval Base and Charleston Naval Weapons Station until March 31, 1996; the other is issued by the state Budget and Control board for dredging at the Naval Weapons Station until June 18, 1997. Both permits should be transferred to the Naval Weapons Station. If dredging at the Naval Base drydocks and piers will be required after March of 1996, then a new dredging permit should be applied for.

The Naval Base has a state issued permit for distribution of potable of potable water.

#### Short Stay:

The Short Stay Recreational Facility in Monks Corner holds a permit for discharges of treated sanitary wastes and a permit for drinking water. These permits should be transferred to the organization that will take ownership of Short Stay.

#### Hazardous Waste

The hazardous waste permit allows us to store hazardous wastes for more than 90 days. The permit consists of a part issued by the state and a part issued by EPA. The state issued part concerns operation of two hazardous waste storage facilities. The EPA issued part concerns cleanup of Solid Waste Management Units (SWMUs). The shipyard plans to request renewal prior to December 4, 1994 (6 months prior to the expiration date of June 4, 1995).

#### Underground Storage Tanks (USTs)

##### Naval Base:

There are 37 permitted USTs on the Naval Base. Of these, 12 have been designated as out of service and will be removed within the year.      will be placed out of service and removed within a year from that date. 9 tanks meet the new regulations and could be transferred to a new owner without any need for upgrading. The remaining tanks could be transferred but would require an assessment and upgrading by December 22, 1998.

##### Short Stay:

There is one gasoline UST at Short Stay that meets the new regulations. This permit should be transferred to the organization that will take ownership of Short Stay.