



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND, MID ATLANTIC
9324 VIRGINIA AVENUE
NORFOLK, VA23511-3095

31 Oct 16

MEMORANDUM FOR THE RECORD

- Subj: NAVY INFORMATION OPERATIONS COMMAND (NIOC)
SUGAR GROVE, WV, PROPERTY ASSESSMENT
- Ref: (a) Department of the Navy (DON) Environmental Policy
Memorandum 06-06: Streamlined Environmental
Procedures Applicable to Non-BRAC Real Estate Actions
- Encl: (1) Final Environmental Condition of Property Report
(ECP) for the Disposal of Navy Information Operations
Command (NIOC) Sugar Grove, WV (Lower Base),
dated June 2014
(2) NAVFAC MIDLANT EV3 Memorandum for the Record,
dated 18 Nov 2015
(3) UST Closure Report, NIOC Sugar Grove, WV (Lower Base)
dated Sep 2016
(4) Remedial Action Completion Report, NIOC Sugar Grove,
WV (Lower Base) dated Oct 2016
(5) No Further Action letter by WVDEP (Leak#16-016),
NIOC Sugar Grove, WV (Lower Base) dated Oct 2016

1. Enclosure (1) satisfies the requirements in reference (a). Enclosure (2) updated enclosure (1) due to new regulatory information received during discussions with regulators and GSA regarding the transfer of property in 2015. This Memorandum will again update and summarize findings for the subject property.

2. NAVFAC MIDLANT Environmental (EV3) reviewed enclosures (1) and (2), and information discussed in this Memorandum. This Memorandum updates, in particular the new information that changed paragraphs 5 and 6 of Enclosure (2).

3. Paragraph 5a (2) USTs 201/202 of enclosure (2) is updated with the following information:

a. In March 2016, the USTs were temporarily closed as part of the Layup proceedings and soil and pit water samples were collected around the tank pit (Enclosure (3)). One soil sample returned above WVDEP action levels for benzene and MTBE, which required reporting to WVDEP. WVDEP issued a new Leak #16-016

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and required corrective action. A removal action of fiberglass tanks and 11 tons petroleum-contaminated soil was completed in August 2016. Soil samples were again collected and one soil sample downgradient of the tank pit still exceeded WVDEP soil action levels for BTEX, TPH-GRO, and benzene. An investigation was then performed to determine horizontal and vertical extents of petroleum contamination. A soil removal action followed and 1600 tons of petroleum-contaminated soil was removed up to 10 feet from the building (Enclosure (4)). However, a remnant of petroleum-contaminated soil could not be fully removed underneath a portion of the southeastern corner of Building 22.

b. Because groundwater is not likely affected, all due diligence was achieved regarding soil removal, and the remnant petroleum-contaminated soil underneath the building could not be removed. WVDEP issued a No Further Action (NFA) on October 11, 2016 (Enclosure (5)).

4. Paragraph 6 of Enclosure (2) is updated by the revised classification of subject property as ECP Area Type 2. The NIOC Sugar Grove property being classified as an ECP Area Type 2 condition indicates where only the release or disposal of petroleum products or their derivatives has occurred.

a. Prior to enclosure (2), regulatory information discovered for Sites 2 and 3, subject property was found to be in ECP Area Type 4 condition. The NIOC Sugar Grove property being classified as an ECP Area Type 4 condition indicated a release of hazardous substances had occurred, and all remedial actions necessary to protect human health and the environment have been taken. The ECP Report (enclosure (1)) and new information provided on the two IR sites (enclosure (2)) should be referred to for more detailed questions of environmental conditions.

b. Enclosure (2) made the distinction that Sites 2 and 3 now had regulatory concurrence of the status NFRAP (No Further Remedial Action Planned) and therefore the two sites were no longer classified as Recognized Environmental Conditions (RECs) but reclassified as CRECs (Controlled RECs) per ASTM E1527-13.

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c. Therefore, the only release at subject property now are due to the UST Historic RECs (HRECs) which are updated in this memo in paragraph 3 above. Being that the subject property environmental condition is now based on the release of petroleum products or their derivatives, the standard condition of property was also updated as ECP Area Type 2.

5. In summary based on detailed information stated in the 2014 ECP Report (enclosure (1), new information provided on the NFRAP of the two IR sites (enclosure (2), and information contained in this Memorandum describe current environmental conditions, and the findings as stated support the property is suitable for transfer.



ROBERT G. SCHIRMER, PE
Environmental Restoration
Product Line Coordinator



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18 Nov 15

MEMORANDUM FOR THE RECORD

Subj: NAVY INFORMATION OPERATIONS COMMAND (NIOC)
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Ref: (a) Department of the Navy (DON) Environmental Policy
 Memorandum 06-06: Streamlined Environmental
 Procedures Applicable to Non-BRAC Real Estate Actions

Encl: (1) Final Environmental Condition of Property Report
 (ECP) for the Disposal of Navy Information Operations
 Command (NOIC) Sugar Grove, WV (Lower Base),
 dated June 2014
 (2) EPA Region 3 (USEPA, A. Olhasso) Email to HR-IPT on
 NFRAP (Site 2 and Site 3) and following State of West
 Virginia Department of Environmental Protection
 (WVDEP, P. Hickman) Email to HR-IPT on NFRAP
 (Site 2 and Site 3) Agreement
 (3) NRS Sugar Grove HRS Scoring Information
 (4) Navy Letter dated June 27, 1991
 (5) Site 2 and 3 Final Covenant (Rev 9-2015)

1. Enclosure (1) satisfies the requirements in reference (a).
 Enclosures (2) through (5) update the findings of enclosure (1)
 for the subject property and are summarized in this memorandum.

2. NAVFAC MIDLANT Environmental (EV3) reviewed enclosure (1,) Environmental Condition of Property Report (June 2014 ECP Report), information and recently again after the new information in Enclosures (2 through (5), that came to light during the discussions regarding the sale of the property through GSA with the coordination and concurrence of the State of West Virginia Department of Environmental Protection (WVDEP) and EPA Region 3 (USEPA). This memorandum findings summarize and are in concurrence with the new information presented in enclosures (2) through (5) where the HR-IPT coordinated with the WVDEP and the USEPA (the regulators).

3. The new information was presented by EPA Region 3 (enclosure (2)) as noted from their SEMS database where a NFRAP determination - No Further Remedial Action Planned for Site 2 and Site 3. These two installation restoration sites were found

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under enclosure (1) to be Recognized Environmental Conditions (RECs) since there was no regulatory concurrence of the No Further Action (NFA) recommendation of the Navy Installation Restoration (IR) Program documentation (NEESA, 1988). Since the new information presented in enclosures (2) through (5) provides the regulatory concurrence for the NFA determination, these sites are now Controlled RECs (CREC's). A CREC is defined by ASTM E1527-13 as a REC that has been addressed to the satisfaction of the applicable regulatory authority, with implementation of restrictions or controls. Additionally now as CRECs, the LUC recommendations of enclosure (1) have been changed to reflect the new information and are outlined in this memo below in paragraph 4, and detailed in enclosure (5).

4. The recommended LUCs for Site 2 and Site 3 contained in enclosure (1) have been changed due to the NFRAP regulator concurrence documentation, eliminating the recommendations for groundwater and soil restrictions. The only remaining LUC recommendations for Site 2 and Site 3 are to address the potential concern for exposure to buried debris. Therefore the recommended LUC is limited to no excavation, digging, or intrusive activities in the site areas. Enclosure (5) details the environmental covenant including the LUC, site properties, and boundaries.

5. The other findings of the ECP Report for the Disposal of Navy Information Operations Command (NOIC) Sugar Grove, WV (enclosure (1)) were in concurrence with EV3 review and are summarized below:

a. **Historic Recognized Environmental Conditions (HRECs)** - Three underground storage tank (UST) sites were identified as HRECs at NIOC Sugar Grove.

(1) UST 200 was a 1,000-gallon, steel heating oil tank installed in 1975 located directly west of Building 20. In April 1995, during the tank removal a small volume of heating oil discharged into the tank excavation pit; approximately three cubic yards of contaminated soil was excavated during the tank removal.

(2) USTs 201/202 are fiberglass-reinforced plastic (FRP) tanks currently located southeast of Building 22. These USTs provide fuel storage for a privately owned vehicle (POV) fueling dispensing facility operated by the Navy Exchange (NEX). The

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current FRP USTs were installed in 1986-1987 to replace two steel USTs that had reportedly leaked (Environmental Science & Engineering, Inc., 1996a). Conflicting records and field evidence cannot confirm whether the existing USTs are single-walled or double-walled, so the assumption is that they are single walled. When the current FRP USTs were installed in 1986-1987, they retained the same tank identification as the previous steel USTs. In 1993, during the replacement of the fuel dispensers and piping, hydrocarbon/ fuel odors were noted near the pump island. On 2 March 1993, WVDEP issued a Confirmed Release Notice to Comply. Groundwater monitoring wells were installed to monitor groundwater contamination and soil was excavated in 1995 in the vicinity of the former pump island (located south of Building 22). The monitoring wells have since been abandoned. ●

(3) USTs 205/206 were previously located near the southwest corner of Building 63. UST 205 was an unregulated 4,000-gallon heating oil tank and UST 206 was a regulated 550-gallon diesel tank. Both USTs were removed in 1995. During closure activities, soil samples indicated total petroleum hydrocarbon (TPH) impact in the tank basin and along the product supply line. Approximately 33 cubic yards of potentially TPH contaminated soil were excavated and backfilled with clean soil during the tank and piping removal. The WVDEP inspector onsite at the time indicated that a site assessment was required for both tanks. The resulting site assessment report recommended no further action at the UST 205/206 site (Environmental Science & Engineering, Inc., 1996b).

All three of these HRECs were addressed under WVDEP Leak Identification Number 93-048. A Review of Closure letter and Review of Confirmed Release Review, both dated 8 December 2004 were issued by WVDEP indicating that the no additional investigation or remedial action was warranted for the three UST sites. Full documentation pertaining to the investigation and closure of Leak Identification Number 93-048 is included with the ECP Report (enclosure (1), Appendix H).

b. Asbestos Containing Material Survey

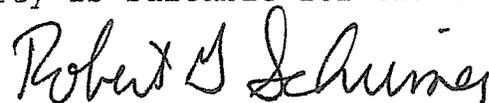
An ACM survey of the facility buildings was conducted as part of the ECP survey and previous ACM reports for the buildings included in the Public Private Venture (PPV) housing lease were reviewed. Although the presence of ACM is not a REC, it is a

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business environmental risk (BER) due to the capital costs and potential liability associated with the identification, abatement, encapsulation/removal, and disposal of ACM. The ACM survey conducted as part of the ECP investigation identified ACM within the PWD/ MWR Gym/ Bowling alley (Building 20), the Youth Center (Building 26), the Administration Building (Building 63), and the Racquetball Court (Building 70). Reviews of previous ACM reports for the buildings included in the PPV housing lease indicate that ACM is present in the Pitsenbarger (Buildings 101-110), Eckard (Buildings 111-118), and Redwood (Buildings 121-123) housing groups. All ACM identified by the ACM survey and identified in previous reports was reportedly in good condition, appears to present minimal potential hazard to building occupants and can be managed in place. If areas of damaged ACM are identified, they should be immediately repaired. If renovation or demolition activities are scheduled, any ACM that could potentially be disturbed should be properly abated and disposed of in accordance with local, state, and federal regulations.

6. The subject property was found to be in ECP Area Type 4 condition. The NIOC Sugar Grove property being classified as an ECP Area Type 4 condition indicates a release of hazardous substances has occurred, and all the remedial actions necessary to protect human health and the environment have been taken. The ECP Report (enclosure (1)) and the new information provided on the two IR sites (enclosures (2) through (5)) should be referred to for more detailed questions of environmental conditions.

7. In summary based on the detailed information stated in the 2014 ECP Report (enclosure (1)), the new information provided on the NFRAP of the two IR sites (enclosures (2) through (5)) describe the current environmental conditions, and the findings as stated support that the property is suitable for transfer.



ROBERT G. SCHIRMER, PE
Environmental Restoration
Product Line Coordinator

ENCL 3 (partial)
- full report can be sent upon request)

**UST CLOSURE REPORT
FORMER NEX FUELING FACILITY
NIOC SUGAR GROVE
SUGAR GROVE, PENDLETON COUNTY, WEST VIRGINIA
WV ID #3-604470; CLOSURE #C-8202-2016; LEAK #16-016**

Prepared for:

NAVFAC MID ATLANTIC
Ms. Carol Peterson
Building N-26 RM 3208
Norfolk, Virginia 23511

September 2016

Prepared by:

CORE 
ENVIRONMENTAL SERVICES, INC.

533 North Jefferson Street, Suite 3, Lewisburg, WV 24901
(304) 520-4260 * Fax (304) 520-4265
www.core-env.com

September 19, 2016

Carol Peterson
NAVFAC MID ATLANTIC
Building N-26 RM 3208
Norfolk, Virginia 23511

Attention: Carol Peterson

**Subject: UST Closure Report – Diesel and Gasoline Tanks
Former NEX Fueling Facility
NIOC Sugar Grove
Sugar Grove, Pendleton County, West Virginia
WV ID #3-604470
Closure #C-8202-2016
Leak ID #16-016**

Dear Ms. Peterson,

On behalf of Service Disabled Contracting Group, Inc. (SDC), CORE Environmental Services, Inc. (CORE) has prepared this Closure Report to document the closure by removal of one 2,000-gallon capacity diesel underground storage tank (UST #1), one 4,000-gallon gasoline UST (UST #2), and the associated product distribution system at the referenced facility. The U.S.G.S. 7.5 minute “Sugar Grove, West Virginia” topographic map indicating the site location and a site map depicting pertinent features are included as Figures 1 and 2, respectively.

On March 23, 2016, temporary closure activities were performed at the site by Triad Engineering, Inc. of Winchester, VA (Triad Engineering). During the temporary closure activities, the nature and extent of petroleum contamination in soil and pit water associated with the UST system was investigated. Laboratory analytical results from the temporary closure activities indicated the potential presence of soil contamination at the site. A summary of soil and UST basin water analytical results collected during the temporary closure activities are included in the Temporary Closure Report prepared and submitted by Triad Engineering and is included as Appendix A.

On May 11, 2016, NAVFAC MID ATLANTIC notified the West Virginia Department of Environmental Protection (WVDEP) Office of Environmental Remediation (OER) of the potential release. The WVDEP-OER subsequently issued a Confirmed Release Notice to Comply (CRNC) letter and assigned Leak ID #16-016 to the site on June 7, 2016.

4068 Mt. Royal Blvd., Suite 225
Allison Park, PA 15101-2951
(412) 487-6000
Fax (412) 487-9785

4 Brookstone Plaza
Morgantown, WV 26508
(304) 292-2673
Fax (304) 292-2773

533 North Jefferson Street, Suite 3
Lewisburg, WV 24901
(304) 520-4260
Fax (304) 520-4265

The WVDEP UST Closure Authorization was issued on August 9, 2016 and is included as Appendix B. A completed Notification for Underground Storage Tanks form is included as Appendix C. The completed Tank Closure Report forms for UST #1 and UST #2 are included as Appendix D.

Closure of the referenced USTs was performed on August 15, 2016 through August 19, 2016, with CORE providing Class B oversight (Matt Ford, B-840). Tank cutting and cleaning services were provided by Eco-First. The diesel and gasoline USTs were found to be in good condition and no apparent breaches were observed during removal. Prior to removal, UST #2 required vapor evacuation using a venturi blower. Each UST was removed from the UST basin and placed on plastic sheeting on the adjacent asphalt covered parking area for cleaning. Approximately ten gallons of product and sludge/tank bottoms was removed from UST #1 and approximately four gallons of product and sludge/tank bottoms was removed from UST #2. Additionally, approximately one gallon of product was removed from the product piping associated with the diesel piping and dispenser. The crushed and cleaned USTs #1 and #2 as well as concrete from the dispenser island weighing approximately 11.74 tons was transported by Potomac Highlands Construction, LLC (PHC) to the Tucker County Landfill in Davis, WV on August 19, 2016 for proper disposal. The UST Certificates of Cleanliness and disposal documentation are included as Appendix E. Photographs documenting the closure are included as Appendix F.

CORE performed soil screening during the closure activities utilizing a calibrated photo-ionization detector (PID), as well as visual and olfactory observations. Soil screening along the south and east walls of the UST excavation indicated that contamination was likely present. Approximately 10.76 tons of petroleum contaminated soil was transported by PHC to the Tucker County Landfill for disposal on August 18, 2016. Weigh tickets and manifests documenting disposal of the excavated soil is included as Appendix G.

Due to the observation of a slight sheen, approximately 1,977 gallons of accumulated pit water was removed with a vac truck by Eco-First, Inc. (Eco-First) and disposed of at a properly licensed facility. Eco-First removed residual product from UST #1 and UST #2 prior to pit water removal. The accumulated pit water removed from the UST basin was transported by Eco-First to Lesage, WV as non-hazardous waste. The non-hazardous waste manifest for the disposal of approximately 1,977 gallons of accumulated pit water is included as Appendix H. Additionally, The residual product, tank sludge and tank cleaning waste removed from UST #1, UST #2 and the product piping associated with the USTs was transported by Eco-First to Mount Vernon, Ohio as hazardous waste. The hazardous waste was considered RCRA-exempt by the destination facility. A hazardous waste manifest for the disposal of one drum containing approximately 15 gallons of residual product, tank sludge and tank cleaning waste is included as Appendix I.

Following removal of the USTs and product piping from the excavation, CORE screened soils within the UST basin, product lines, and dispenser island in accordance with 40 CFR 280.72 and WVDEP regulations. A calibrated PID was used to screen soils during the sample collection. Each soil sample retained for laboratory analysis was collected directly from the excavator bucket, placed in proper laboratory provided

containers, and immediately placed on ice. A separate soil sample was collected at each sample location and placed in a re-sealable plastic bag to screen using the PID. Approximate soil sample locations collected on August 17, 2016 are illustrated on Figure 3.

Eight confirmatory soil samples were collected and preserved via Environmental Protection Agency (EPA) method 5035 using methanol and sodium bisulfate preserved vials and sterile glass jars. Soil samples were immediately placed on ice and transported under standard chain-of-custody protocol to Research Environmental & Industrial Consultants, Inc. (REIC) for analysis of benzene, toluene, ethylbenzene, xylenes (BTEX) and methyl tert-butyl ether (MTBE) via Environmental Protection Agency (EPA) Method 8021B, total petroleum hydrocarbon (TPH)-gasoline range organics (GRO) and TPH-diesel range organics (DRO) via EPA method 8015C.

Laboratory analytical data indicated all soil samples collected during the UST closure activities to be below the WVDEP LUST action levels for soil, with the exception of the soil sample collected from the south wall of the excavation area. Laboratory analytical data indicated the presence of benzene (1,160 micrograms per kilogram (ug/kg)), total BTEX (24,330 ug/kg), and TPH-GRO (134 milligrams per kg (mg/kg)) at levels exceeding WVDEP LUST action levels for the “South Wall” soil sample. Soil analytical data from soil samples collected during the UST closure activities are included in Table 1, and are illustrated on Figure 4. A copy of the laboratory analytical report is included as Appendix J and a copy of REIC’s laboratory certification is included as Appendix K.

Based on the results presented above, CORE recommends additional site assessment to include the advancement of soil borings to further delineate the vertical and horizontal extent of potential soil contamination adjacent to the former UST basin.

Please contact us at (304) 646-7616 should you have any questions regarding the contents of this report.

Sincerely,

CORE Environmental Services, Inc.



Kinder Tuckwiller
Field Technician



Matthew A. Ford, LRS
West Virginia Operations Manager



**Leaking Underground Storage Tank
REVIEW OF CONFIRMED RELEASE**

A review of the information provided in compliance with the Confirmed Release Notice to Comply issued on June 7, 2016 for the facility referenced below has been completed.

Facility	LEAK #	WV ID #	CLOSURE #	
	16-016	3-604470	C-8202-2016	
	NAME	CITY		PHONE
	Former Navy Exchange Facility	Sugar Grove	26815	Pendleton
	ADDRESS	CITY	ZIP	COUNTY
		Sugar Grove	26815	Pendleton
Owner	NAME	CONTACT PERSON	PHONE	
	Department of the Navy	Carol Peterson	757 341 0453	
	ADDRESS	CITY	STATE	ZIP
	1510 Gilbert St	Norfolk	VA	23511
Operator	<input type="checkbox"/> Owner <input type="checkbox"/> Other: NAME			PHONE
	ADDRESS	CITY	STATE	ZIP

Review of Confirmed Release	
<input type="checkbox"/> Incomplete:	See required actions below.
<input checked="" type="checkbox"/> Complete:	NO FURTHER ACTION required at this time.

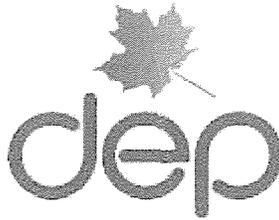
Reports Due	
The tank owner/operator must submit the following reports to WVDEP within the specified timeframes:	
<input type="checkbox"/>	Initial Abatement Measures and Site Check Report (40CFR280.62)
<input type="checkbox"/>	UST Closure Report
<input type="checkbox"/>	Initial Site Characterization (40CFR280.63)
<input type="checkbox"/>	Free Product Recovery Report (40CFR280.64)
<input type="checkbox"/>	Site Investigation Report (40CFR280.65)
<input type="checkbox"/>	1. There is evidence that groundwater wells have been affected by the release. 2. Free product has been found and needs to be recovered. 3. There is evidence that contaminated soils may be in contact with groundwater. 4. The implementing agency requests an investigation, based on the potential effects of contaminated soil or groundwater on nearby surface water and groundwater resources.
<input type="checkbox"/>	Corrective Action Plan (40CFR280.66)
<input type="checkbox"/>	Other:

Report Submittals	
All reports/correspondence must reference the Leak ID and WV ID and be mailed and e-mailed to the following locations:	
Sheena Moore, Project Manager WVDEP, 22288 Northwestern Pike, Romney, WV 26757 Phone: 304-707-6094 Email: sheena.r.moore@wv.gov	Attn: Office Assistant WVDEP – OER, 601 57 th Street SE, Charleston, WV 25304 Phone: 304-926-0499, ext. 1817 Email: DEPOERFileCopy@wv.gov

WARNING: If you are the owner and/or operator and you fail to accomplish the above-described measures within the time specified, the Director may issue an Administrative Order and/or may commence a Civil Action in the Circuit Court, including a temporary or permanent injunction in accordance with West Virginia Code §22-17-15, and you may be liable for a civil penalty in accordance with §22-17-16.

Project Manager's Signature:  **Date:** 10/11/2016
Certified Mail or Signature 7015 0640 0000 8937 5948 **Date:** _____

ENCL 5



west virginia department of environmental protection

Office of Environmental Remediation
22288 Northwestern Pike
Romney, WV 26757
Phone: 304-707-6094

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
dep.wv.gov

October 11, 2016

Attn: Carol Peterson
Department of the Navy
1510 Gilbert St
Norfolk, VA 23511

Re: Review of Request for No Further Action
Leak #16-016 / WVID #3-604470
Former Navy Exchange Facility, Sugar Grove, Pendleton County

Dear Carol Peterson:

A review of the reports submitted by your company and/or consultant and other file information has been completed. Based on the information that you have provided, the Leaking Underground Storage Tank Section of the Office of Environmental Remediation is requiring "No Further Action" at this time for the above referenced site.

If you have any questions, please contact me by phone at 304-707-6094 or email at sheena.r.moore@wv.gov.

Sincerely,

Sheena R. Moore
Project Manager

cc: WVDEP File #16-016
ec: Erin Brittain, Program Manager, WVDEP/OER