Fratello & Amico, Inc.

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December 20, 2018

Mr. George Grant
International Support Group, LLC
9000 Sheridan Street, Suite 172
Pembroke Pines, FL 33024-8803
DUNS:832760479
CAGE:5TJ55

RE: CSS #13650 VA051 Report of OWS Invasive Investigation; Hall USARC, 1915 Roanoke Boulevard, Salem, VA 24153

Dear Mr. Grant,

We are pleased to submit the following report of our findings for the OWS Invasive Investigation.

The above facility has a Oil-Water Separator which was indicating the following issues when we visited the facility on Tuesday, August 14, 2018:

1) The Highland Tank Annunciator Panel is indicating an Alarm Condition on both Probes 1 and 2.
2) The Interstitial Space should be dry but it contains approximately 19" of liquid.
3) The Leak Probe still indicates Alarm after it was removed from the Interstitial Space.

We submitted a proposal to conduct a more invasive investigation based on our findings, that was approved earlier this month and we returned to perform this on Monday, December 17, 2018, findings below:

The OWS contained 34" of liquid, appeared to be clear water, just a sheen of oil on the surface.
The Interstice contained just 8" of water, although it contained 19" four months earlier.
We evacuated the interstice and conducted two back-to-back vacuum tests IAW PEI/RP1200-17
Our initial test commenced at 1:15pm and concluded at 2:15pm, the second immediately thereafter.
In order to pass the test, a tank must hold 10" of vacuum for one hour.
The first test started at 10" and finished at 8.5", the second test concluded with 9" of vacuum.
Obviously both tests indicate a failure of tank integrity.
The Panel Alarm was traced to underground PVC conduit that had flooded with water and shorted the wires.

Conclusions and Recommendations: It would appear that the OWS has a leak in the outer shell somewhere between the base and 8" above the bottom. The installation records for this are not available but indications are that it was installed in 2009. We also know that in March of 2016 we visited the facility and found 23" of water within the interstice. The original installation contractor used all PVC conduit which was almost completely destroyed by the mowing contractor as soon as it was in place. While most is underground, the connections on top of the tank were subject to traffic, damage, and ultimately precipitation infiltration.

While new OWS units are heavily coated on both the interior and exterior surfaces, the interstice (the space between the exterior of the inner tank and the interior of the outer tank) is bare steel, and vulnerable.

A proposal for options on how to proceed will be prepared and submitted before the end of the month. Photos of this service are attached, the invoice along with signed COW will be submitted shortly.

If you have any questions, please feel free to call at any time.

Sincerely,

Fratello and Amico, Inc.

Raymond B. Chain, III
President

APPENDIX C-1

TANK SECONDARY CONTAINMENT INTEGRITY TESTING DRY TEST METHOD

Facility Name: Salem USARC	Owner:		
Address: 1915 Roanoke Blvd	Address:		
City, State, Zip Code: Salem VA 24153	City, State, Zip Code:		
Facility I.D. #:	Phone #:		
Testing Company: FAR	Phone #: 4644576 0854	Date: 12/17/18	

This data sheet is for testing the integrity of the dry secondary containment of a underground storage tank (UST). See PEI/RP1200 Section 4.2 for the test procedure.

Tank Number	OWS	OWS				
Tank Material	Steel	STEEL				
Product Stored	WATER	WATER				
Tank Capacity,* gallons	550	550				
Test Start Time	115 pm	215				
Initial Vacuum Reading, inches Hg (See Table 4-1 below.)	10"	10"				
Specified Test Duration (See Table 4-1 below.)	☑ 1 hour ☐ 2 hours	☑ 1 hour ☐ 2 hours	☐ 1 hour ☐ 2 hours	☐ 1 hour ☐ 2 hours	☐ 1 hour ☐ 2 hours	☐ 1 hour ☐ 2 hours
Test End Time	215	315				
Final Vacuum Reading, inches Hg	8.5	9				
Is the Annular Space Dry After the Test?	☐ Yes ☑ No	☐ Yes ☑ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
Test Results	☐ Pass ☑ Fail	☐ Pass ☑ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail

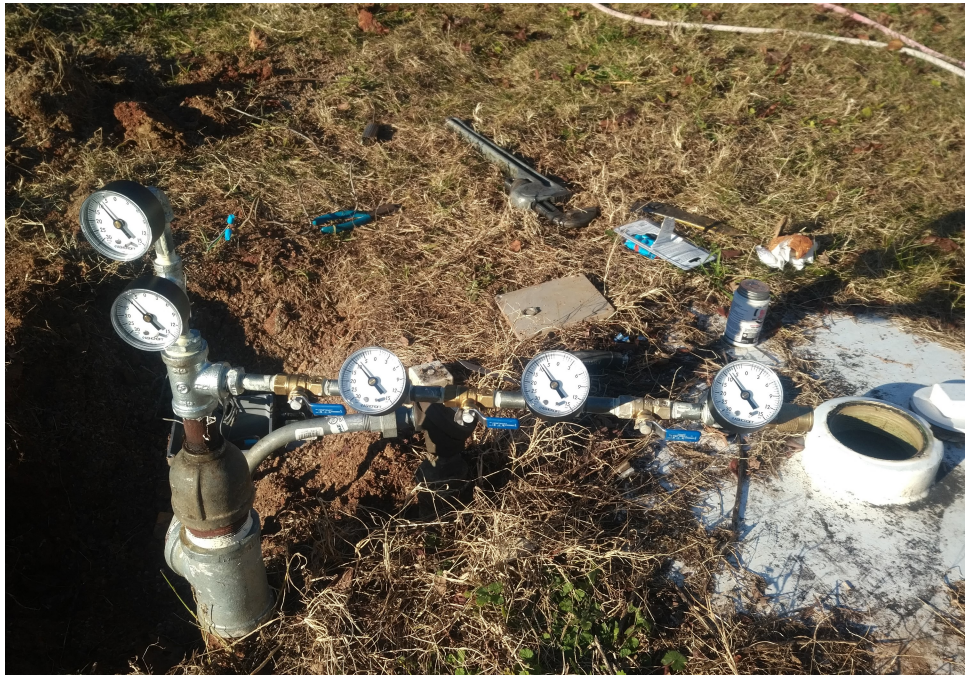
TABLE 4-1

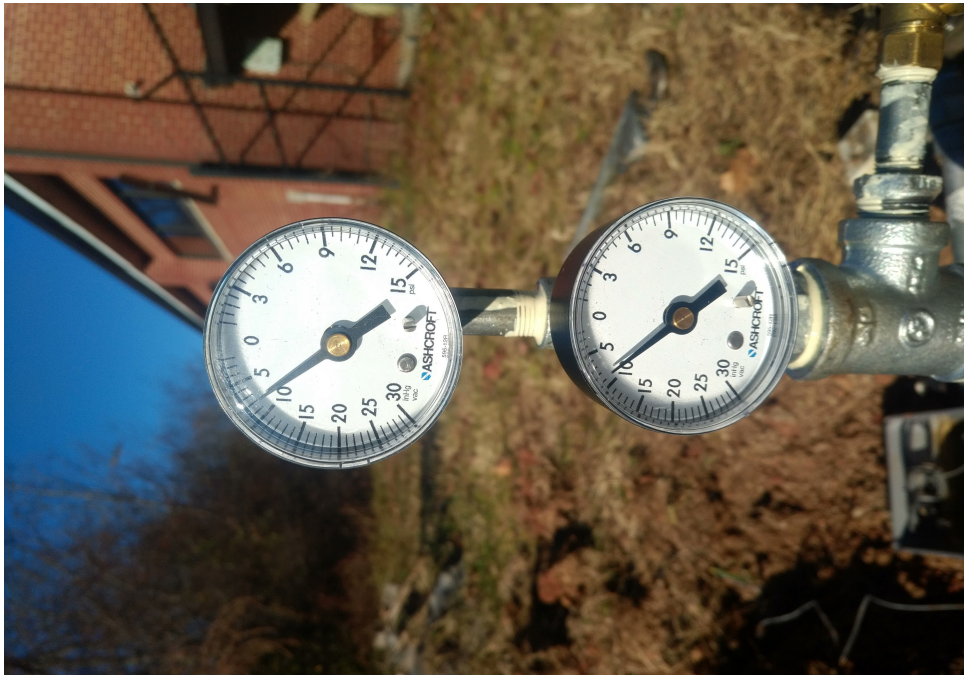
Vacuum, inches Hg	Capacity, gallons	Duration, hours
10	<20,000	1
	20,000+	2

Comments:

*Total tank capacity, including all compartments in a multi-compartment tank.

Tester's Name (print) Ray Chain Tester's Signature

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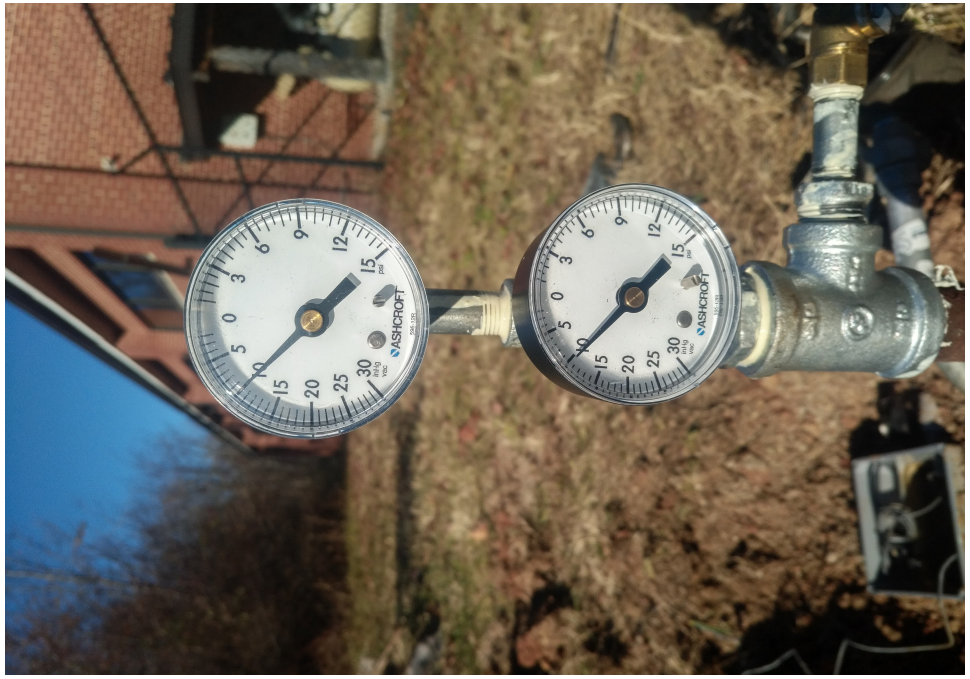
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