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NAS CECIL FIELD
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LETTER REGARDING REQUEST FOR EMERGENCY DETONATION PERMIT FOR
DESTRUCTION OF HAZARDOUS WASTE NAS CECIL FIELD FL
8/9/2012
BRAC PMO SOUTHEAST



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE SOUTHEAST
4130 FABER PLACE DRIVE
SUITE 202
NORTH CHARLESTON, SC 29405

11011
Ser BPMOSE afs/0057
August 9, 2012

Florida Department of Environmental Protection
Attn: Mr. Anthony R. Tripp, Ph.D., P.E.
2600 Blairstone Road, Twin Towers
Mail Stop 4560
Tallahassee, Florida 32399

Dear Mr. Tripp:

SUBJECT: EMERGENCY DETONATION PERMIT REQUEST, FORMER NAVAL AIR
STATION CECIL FIELD, RCRA CORRECTIVE ACTION PERMIT
NUMBER 13526-HH-004, JACKSONVILLE, FLORIDA

Request by Base Realignment and Closure Program Management Office Southeast (BRAC PMO SE) for an emergency permit from the Florida Department of Environmental Protection (FDEP) to allow the thermal treatment/destruction of hazardous waste. The treatment will be carried out by the Naval Ordnance Safety and Security Activity (NOSSA), BRAC PMO SE, and the BRAC PMO SE Munitions Response/Explosive Ordnance Disposal (EOD) Contractor USA Environmental, Inc. (USA) at Site 15 Munitions Response Area (MRA) located at the former Naval Air Station Cecil Field, Jacksonville, Florida. The treatment involves deactivation or destruction of a reactive waste, (i.e., recovered munitions and explosives of concern (MEC) that present an unacceptable hazard for transportation to a disposal site). This permit is for the detonation of MEC found during the munitions response ongoing at Site 15 as part of a Non-time Critical Removal Action (NTCRA) which began July 23, 2012 and estimated to be completed no later than August 31, 2012.

FINDINGS OF FACT

1. The specific waste found during the NTCRA between July 23, 2012 and the projected end date of August 31, 2012 to be thermally treated/destroyed by detonation are to be determined during the course of the activities at the Site and will be specified in the final report for the facility to be delivered to the Department. The following specific wastes have been recovered to date:

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- Approximately (5) each 20-MM Cartridge Case (live primer only) consisting of an electrical primer only (projectile and propellant are missing) (approx. NEW 0.0031 lbs) contained in a steel or brass cartridge case without a projectile.
- Approximately (10) each U.S. Projectile, 20-MM, HE, M56A4 consisting of a high explosive projectile (approx. NEW 0.264 lbs).
- Approximately (1) each An-M103 fuze.
- Approximately (1) each MK 25 Marine Marker consisting of an electrically activated squid which initiates red phosphorous smoke charge (approx. NEW 0.8692 lbs) contained in a metal cartridge.
- Approximately (1) each An-M8 HC smoke Grenade.
- Approximately (2) each MK 13 Day Night signal flare.

USA has determined the above waste to be unsafe to transport for disposal. Because of the flammable, shock-sensitive, reactive, and explosive nature of this hazardous waste, there is a potential danger to the health and welfare of those persons coming in contact with this waste if the waste is not handled in the proper manner. Based on the above, the hazardous waste presents an imminent hazard to persons and property in its proximity.

Note 1: the NEW of these items is considered negligible. The total NEW of the demolition of these items will be kept within 4.5 lbs as discussed below.

2. NOSSA, BRAC PMO SE, and USA will abate the imminent hazard identified in Findings of Fact #1 by thermal destruction of the unstable, flammable, shock-sensitive, and potentially explosive hazardous waste.
3. The treatment operation will be accomplished in accordance with this request; "Work Plan, Removal Action - NAS Cecil Field OU5 Site 15 Jacksonville, FL," Revision No. 00 dated July 2012 and the project Explosives Safety Submission, Correction No. 01, dated July 2012.
4. All other local, state, and federal approvals and licenses will be obtained prior to conducting thermal treatment activities.

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5. The hazardous waste will be treated/destroyed via detonation in a field (latitude: 30°14'29.588"North; longitude: 81°55'21.574"West) within the Site 15 MRA located at the former Naval Air Station Cecil Field, Jacksonville, Florida. The treatment site is owned by the Navy.

The closest permanent residence is located approximately 2,300 feet to the Northwest of the treatment site.

6. The following general procedures will be used to thermally treat and destroy the items listed in Findings of Fact #1:

The general procedure will be to use one-pound RDX cast boosters as donor explosives to thermally treat and destroy the items. The boosters and items will be segregated into treatment/detonation events not to exceed 4.5 lbs. Net Explosives Weight. All treatment/detonation events will be done with protective works/engineering controls by surrounding with three feet of sand in all directions.

7. The hazardous waste will be thermally treated under the supervision and control of NOSSA, BRAC PMO SE, and USA. These officials are experienced in the handling and disposal of explosives.
8. Any visible residue or debris resulting from the treatment process will be removed and properly disposed of offsite by approved methods. Post-treatment soil sampling will be completed at the conclusion of the NTCRA to ensure no contamination remains following residue/debris removal. The number of soil samples will be determined based on the number of treatment sites. Laboratory analysis of each of the soil samples from the treatment site for metals and nitro aromatics (explosives) is planned.
9. Adequate fire and personal protection to assure confinement and control of any fire resulting from the operation, and to prevent injuries of personnel present, will be provided.
10. Prior to the thermal treatment, the treatment site in Findings of Fact #5 will be secured and access restricted except to authorized personnel. Additionally, prior to the treatment operation, a visual inspection will be performed within a minimum 224-foot radius of the treatment site described in

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Findings of Fact #5 to assure that no unauthorized personnel are on site. Based on the engineering controls calculations provided in the Department of Defense Technical Paper 16, Revision 3, Buried Explosion Module three feet of sand will require a safety arc of 224 feet. The Buried Explosion Module calculation will be provided to the field team before commencing treatment operations.

11. A detailed written summary of the actual procedures used for treatment, details on the reasons for any deviations from the plans and information submitted for this request, the disposition of any residues from the treatment process, as well as any additional pertinent information will be submitted within 60 days of completion of the NTCRA to both:

Florida Department of Environmental Protection, Northeast District

ATTN: Waste Program Administrator
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256

and

Florida Department of Environmental Protection
ATTN: Mr. Anthony R. Tripp, Ph.D., P.E.
2600 Blainstone Road, Twin Towers
Mail Stop 4560
Tallahassee, Florida 32399

12. Thermal treatment of the waste as specified above in Findings of Fact #1 will occur in an open field as described in Findings of Fact #5 within the next 60 days.

Sincerely,



MARK E. DAVIDSON
BRAC Environmental Coordinator

Copy to via email:

EPA Region 4 (Debbie Vaughn-Wright)

FDEP (David Grabka)

JAA (Rusty Chandler)

PPOSE (David Criswell, Stacin Martin, Art Sanford)