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NAS CECIL FIELD
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EMERGENCY DETONATION PERMIT REQUEST FOR TREATMENT/DESTRUCTION OF HAZARDOUS WASTE NAS CECIL FIELD FL

4/2/2014

BRAC PMO EAST

DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

5090
Ser BPMOE/14-110
April 2, 2014

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

Dear Mr. Tripp:

SUBJECT: EMERGENCY DETONATION PERMIT REQUEST FORMER NAVAL AIR STATION CECIL FIELD RCRA CORRECTIVE ACTION PERMIT NUMBER 13526-HH-015 JACKSONVILLE, FLORIDA

The Base Realignment and Closure Program Management Office East (BRAC PMOE) requests 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 PMOE, and the BRAC PMOE munitions and explosives of concern (MEC) investigation contractor CH2M HILL at Hangar 860 Munitions Response Area (MRA) located at the former Naval Air Station Cecil Field in Jacksonville, Florida. The treatment will include the deactivation or destruction of a reactive waste, (i.e., recovered MEC that present an unacceptable hazard for transportation to a disposal site). This permit is for the detonation of MEC that may be found during the surface MEC investigation at Hangar 860 site. This work has begun on March 24, 2014, and is estimated to be completed no later than April 18, 2014.

FINDINGS OF FACT

1. It is anticipated that reactive waste material requiring thermal treatment will be recovered during the munitions response activities to be conducted between March 24, 2014, and April 18, 2014. An itemized list will be provided in the summary report required to be submitted within 60 days of the treatment process.

   It is assumed that the recovered reactive wastes will be unsafe to transport for disposal. Because of the anticipated 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, it is anticipated that the hazardous waste will present an imminent hazard to persons and property in its proximity.

2. NOSSA, BRAC PMOE, and CH2M HILL 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, Surface Investigation at Hangar 860 Munitions Response Area, Former Naval Air Station Cecil Field, Jacksonville, FL,*" dated February 2014 and the project Explosives Safety Submission, Amendment 5, Correction No. 01, dated February 2012.

4. All other local, state, and federal approvals and licenses will be obtained prior to conducting thermal treatment activities.

5. The hazardous waste will be treated/destroyed via detonation in a field (latitude: 30° 13' 11.5" North; longitude: 81° 53' 41.78" West) within the Hangar 860 MRA located at the former Naval Air Station Cecil Field, Jacksonville, Florida. The location of treatment site is owned/operated by the Jacksonville Airport Authority. The closest permanent residence is located approximately 6,800 feet to the west 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 2.62 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 PMOE, and CH2M HILL. 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 sent off site for proper disposal by approved methods. Post-treatment soil sampling will be completed at the conclusion of the investigation 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 250 foot radius of the treatment site described in Findings of Fact #5 to assure that no unauthorized personnel are present. 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 investigation to both:

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Florida Department of Environmental Protection,
Northeast District
Attn: Waste Program Administrator
8800 Baymeadows Way West, Suite 100
Jacksonville, FL 32256

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

12. Thermal treatment of the waste recovered during the munitions response activities described in Findings of Fact #1 will occur in an open field as described in Findings of Fact #5 within 60 days of recovery.

If you have any questions, or need additional information, please contact Mr. Art Sanford at (843)963-4974 or email art.sanford.ctr@navy.mil.

Sincerely,

DAVID CRISWELL, P.E.
BRAC Environmental Coordinator
By direction of BRAC PMO