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NAS CECIL FIELD
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TRANSMITTAL LETTER AND EMERGENCY DETONATION PERMIT ORDER FOR
TREATMENT/DESTRUCTION OF HAZARDOUS WASTE NAS CECIL FIELD FL
4/4/2014
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

April 04, 2014

Sent Via E-mail

david.criswell@navy.mil

R. David Criswell, P.E.
BRAC PMOE
4911 South Broad Street
Philadelphia, Pennsylvania 19112-1303

SUBJECT: Former Naval Air Station Cecil Field; EPA ID No. FL5 170 022 474
Emergency Permit No.0013526-HE-016

Dear Mr. Criswell,

Enclosed you will find an emergency permit order, along with the public notice. Please ensure that publication of the attached public notice is within the time allotted.

Please contact Anthony Tripp at (850) 245-8766 or Anthony.Tripp@dep.state.fl.us if you have any comments or questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim J. Bahr".

Tim J. Bahr, Administrator
Hazardous Waste Program & Permitting

cc (with enclosures):

Brian Bastek, EPA/Region 4, Bastek.Brian@epamail.epa.gov
Ashwin Patel, Jacksonville/FDEP, Ashwin.Patel@dep.state.fl.us
Stacin Martin, CIV NAVFAC LANT, EV, Stacin.Martin@navy.mil
Rusty Chandler, Jacksonville Airport Authority, RChandler@jaa.aero
David Grabka, FDEP, David.Grabka@dep.state.fl.us
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HERSCHEL T. VINYARD JR. SECRETARY

BEFORE THE STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

In Re:) April 04, 2014
Request for an Emergency Permit by)
Base Realignment and Closure Program Management)
Office East) Permit Number:
4911 South Broad Street)
Philadelphia, PA 19112-1303) 0013526-HE-016

FINAL ORDER

BY THE DEPARTMENT:

The Department received an application for an emergency treatment permit on April 02, 2014, from R. David Criswell, Base Realignment and Closure Program Management Office East (BRAC PMOE) BRAC Environmental Coordinator, Philadelphia, Pennsylvania. The request is for the thermal treatment/destruction of hazardous waste. 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. The devices present an imminent hazard to persons and property in proximity to the devices. While the devices present a potential imminent threat to life, property, human health and the environment they do not require immediate response activities to eliminate or address the actual or potential imminent threat. BRAC PMOE has requested an emergency permit in accordance with Subpart M of 40 CFR Part 266 with the waste military munitions subject to the jurisdiction of the Department of Defense Explosives Safety Board. The treatment will be carried out within the next 60 days, but no later than 90 days from the date this document is issued, by the Naval Ordnance Safety and Security Activity (NOSSA), BRAC PMOE, and the BRAC PMOE Munitions and Explosive of Concern investigation contractor CH2M HILL at the former Naval Air Station Cecil Field, Jacksonville, Florida at latitude: 30°13'11.5"North; longitude: 81°53'41.78"West.

FINDINGS OF FACT

- 1. The specific wastes found during the munitions response for the Hangar 860 Munitions Response Area (MRA) site occurring between March 24, 2014 and April 18, 2014 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.

PERMITTEE: Base Realignment and Closure Program Management Office East

4911 South Broad Street

Philadelphia, Pennsylvania 19112-1303

I.D. NUMBER: FL5 170 022 474

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2. The treatment by thermal destruction of the wastes identified in Findings of Fact #1 of this permit will be carried out by NOSSA, BRAC PMOE, and the BRAC PMOE Munitions Response/EOD Contractor (CH2M HILL) at the former Naval Air Station Cecil Field, Jacksonville, Florida at latitude: 30°13'11.5"North; longitude: 81°53'41.78"West.
3. The wastes identified in Findings of Fact #1 are unsafe to transport for disposal. Because of the flammable, shock sensitive, reactive, and explosive nature of the material, 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 a proper manner.

CONCLUSION

Based on the above-stated facts, the Department finds that the hazardous waste presents an imminent hazard to persons and property in its proximity if transported offsite for disposal. The waste specified in Findings of Fact #1 shall be thermally treated in an environmentally sound and Department-approved manner. Therefore, pursuant to Sections 403.726(5) and 120.59(3), Florida Statutes, it is hereby

ORDERED

1. The Permittee shall undertake whatever action necessary to comply with Rule 62-730.320, Florida Administrative Code.
2. NOSSA, BRAC PMOE, and CH2M HILL will treat the imminent hazard identified in Findings of Fact #1 by thermal destruction of the unstable, flammable, shock-sensitive, and potentially explosive hazardous waste.
3. Only the waste specified in Findings of Fact #1 shall be thermally treated to deactivate or destroy the hazardous nature of the waste.
4. The hazardous waste will be treated via detonation in a field within the Hanger 860 MRA located at the former Naval Air Station Cecil Field, Jacksonville, Florida, specifically at latitude: 30°13'11.5"North; longitude: 81°53'41.78"West. The closest permanent residences are located approximately 6,800 feet from the treatment site to the west.
5. Thermal treatment will be accomplished in accordance with Subpart M of 40 CFR Part 266, the Military Munitions Rule. The thermal treatment of the items listed in Findings of Fact #1 will be accomplished in accordance with the "*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.
6. The procedure used to thermally treat and destroy the items listed in Findings of Fact #1 will be detailed in the final report for each treatment. 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 Explosive 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 Permittee shall obtain all other local, state and federal approvals and licenses required for conducting the activities described in this permit.
8. Any visible residue or debris resulting from the treatment process shall be removed and properly disposed of by approved methods. Post-treatment soil sampling will be completed at the conclusion of the treatment period 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 shall be secured and access restricted except to authorized personnel. Additionally, prior to the treatment operation, the Permittee will perform a visual inspection within a minimum 250-foot radius of the treatment site to assure that no unauthorized personnel are on site. Based upon 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.
11. Within 60 days of completion of the thermal treatment authorized by this permit the Permittee shall submit to the Department a detailed, written report description of the specific actual procedures used for treatment, details on the reasons for any deviations from the plans, items that were treated, and the disposition of any residues from the treatment process, as well as any additional pertinent information. This report shall be submitted to the following locations:

Florida Department of Environmental Protection, Northeast District
ATTN: Waste and Air Resource Management Administrator
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

and

Florida Department of Environmental Protection
ATTN: Environmental Manager
2600 Blair Stone Road
Mail Stop 4560
Tallahassee, Florida 32399-2400

PERMITTEE: Base Realignment and Closure Program Management Office East
4911 South Broad Street
Philadelphia, Pennsylvania 19112-1303

I.D. NUMBER: FL5 170 022 474
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12. Thermal treatment of the waste as specified above in Findings of Fact #1 of this permit shall take place no later than 90 days from the date this document is issued.
13. The local Department of Environmental Protection Northeast District representative or its designee shall be notified prior to each disposal operation and have the option of being present to observe the thermal treatment operation.
14. Pursuant to Rule 62-730.220(2), of the Florida Administrative Code (F.A.C.), the attached Public Notice No. 0013526-HE-016 shall be published one time only in the legal ad section of a local newspaper in Duval County within 30 days of permit issuance. Proof of publication shall be provided to the Department within 14 days of publication of the notice.
15. This permit expires 90 days after the issuance date.

Issued: April 4, 2014

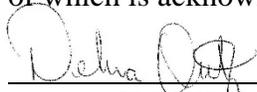
**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

 for

**CHARLES F. GODDARD, PROGRAM ADMINISTRATOR
PERMITTING AND COMPLIANCE ASSISTANCE PROGRAM**

Filing and Acknowledgment

Filed on this date, pursuant to Section 120.52, Florida Statutes, with the designated Clerk, receipt of which is acknowledged.



CLERK

April 4, 2014
DATE

**STATE OF FLORIDA
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
2600 BLAIR STONE RD
TALLAHASSEE, FLORIDA 32399**

**NOTICE OF INTENT TO ISSUE EMERGENCY PERMIT NO. 0013526-HE-016
UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT
AND THE FLORIDA RESOURCE RECOVERY AND MANAGEMENT ACT.**

The Department of Environmental Protection (DEP) gives notice of intent to issue an Emergency Permit to the Department of the Navy Base Realignment and Closure Program Management Office East.

The treatment site will be at the Hanger 860 Munitions Response Area located at the former Naval Air Station Cecil Field, Jacksonville, Florida at latitude: 30° 13' 11.5" North; longitude: 81° 53' 41.78" West.

The permit authorizes the detonation and treatment of unstable, reactive, flammable, shock-sensitive or explosive materials.

An emergency permit pursuant to Sections 403.726(5) and 120.59(3), F.S., and Rule 62-730.320, F.A.C., is warranted because there is an imminent and substantial endangerment to human health and the environment. The issuance of this permit will result in environmental benefits as compared with the previous storage conditions of the waste. The permit is drafted in accordance with the provisions of the Resource Conservation and Recovery Act and the Florida Resource Recovery and Management Act, and is designed to protect human health and the environment.

The permit files are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399, or at the NE District Office, 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256.

Persons wishing to comment upon the permit issuance or to the permit conditions are invited to submit same in writing within forty-five (45) days of the date of this notice to the following address: Florida Department of Environmental Protection, ATTN: Environmental Manager, 2600 Blair Stone Road, Mail Stop 4560, Tallahassee, Florida 32399-2400.

The public notice number should be included in the first page of the comment.

All comments received within the 45-day period will be considered in the formulation of future emergency permits.