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LETTER REGARDING U S EPA REGION IV NOTICE OF TECHNICAL INADEQUACY FOR
HAZARDOUS AND SOLID WASTE AMENDMENTS PERMIT RENEWAL APPLICATION NAS
KEY WEST FL
12/18/2000
U S EPA REGION IV

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4
ATLANTA FEDERAL CENTER
81 FORSYTH STREET
ATLANTA, GEORGIA 30303-8980

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CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. L.S. Cotton
U.S. Navy, Commanding Officer
Department of the Navy
Naval Air Station
PO Box 9001
Key West, Florida 33040-9001

RE: Notice of Technical Inadequacy (NOTI)
HSWA Permit Renewal Application
Dated, August 29, 2000
US Naval Air Station, Key West, Florida
EPA I.D. Number: FL6 170 022 952

Dear Mr. Cotton:

The United States Environmental Protection Agency (EPA) has completed its review of the Hazardous and Solid Waste Amendments (HSWA) Permit Renewal Application, dated August 29, 2000, for the United States Naval Air station, Key West, Florida. The technical inadequacies identified during the review of the HSWA Permit Renewal Application, are mentioned below:

1. The Permit Renewal Application must acknowledge that all HSWA corrective action conditions of the existing permit will continue beyond the expiration date of the HSWA conditions if a new HSWA portion of the RCRA Permit is not issued on or before the expiration date of the HSWA conditions.
2. The facility must submit information on the current status of on-going activities at each SWMU and submittal of the effectiveness/monitoring reports on treatment/monitoring with reference to different media.

Please address the above-stated technical inadequacies, and submit two (2) copies of the revised HSWA Permit Renewal Application to EPA and one (1) copy to the Florida Department of Environmental Protection (FDEP), within sixty (60) calendar days after the receipt of this letter.

It is important to note that FDEP was authorized for the HSWA corrective action on November 17, 2000 and therefore, EPA will not issue the HSWA Permit. At present, EPA and FDEP will jointly manage the HSWA corrective action under the existing permit until FDEP incorporates the HSWA requirements in their RCRA Permit. In the meantime, this NOTI stands for the collection of additional information from the facility so that the requirements for a complete HSWA Permit Renewal Application are met. After the completion of the HSWA Permit Renewal Application requirements, FDEP will incorporate the HSWA conditions in their RCRA Permit.

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If you have any question(s) regarding this letter, please contact Mr. Harbhajan Singh of my staff at (404) 562-8473.

Sincerely,



Narindar M. Kumar, Chief
RCRA Programs Branch
Waste Management Division

CC: Satish Kastury, FDEP/Tallahassee
Lisa Gordon, FDEP/Marathon
Dudley Patrick, Southern Naval Facilities
Engineering Command/North Charleston
Turpin Ballard, USEPA Region 4/Federal Facilities Branch