

N00213.AR.001181  
NAS KEY WEST  
5090.3a

US NAVY RESPONSES TO REGULATORY COMMENTS ON RCRA OPERATING PERMIT  
APPLICATION 07 JUNE 1996 NAS KEY WEST FL  
4/1/1997  
NAVFAC SOUTHERN

Permit Application dated June 7, 1996 Comments

page/paragraph/line

**General Comments:**

1. It was noted that the RCRA unit on the southeast spoil pile, identified as the "open detonation" unit in the 1988 operating permit application, was not included in the subject closure permit application. Information necessary to complete closure activities for this unit must be included in the closure permit application. Please provide the same amount of detail about the SE site as was provided for the NW unit, and details about the ordnance materials during the past and current use of the SE spoil pile. In addition, provide the information requested in this NOD for both RCRA units.

**Response:** A position paper was submitted to DEP along with a letter dated November 8, 1996 regarding this issue. A response from DEP dated March 31, 1997 clarified this as a non-issue. The letter stated "...documentation stating the unit was never operational is sufficient.....a closure permit for this unit will not be required." Therefore this issue has been resolved, and no changes regarding this issue are included in the closure application. The position paper and its subsequent correspondence are included at the end of this NOD.

2. The information regarding the quality assurance/quality control for the assessment work proposed in this application (for both RCRA units) must be submitted on the enclosed DEP Form 62-160.900(1) before it can be forwarded to the Department's Quality Assurance Section (QAS) for review. Also enclosed are Section 5 of the *DEP Manual for Preparing Quality Assurance Plans and Instructions on Completing DEP Form 62-160.900(1)* to help you prepare the QAPP. The RCRA Section did a preliminary review of the QA information in the application, resulting in Comments #16 and 17 below.

**Response:** DEP Form 62-160.900(1) has been completed and is included as Appendix F to the closure application.

**Specific Comments:**

**Comment:**

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3. Please provide page 2 of the application with the corrected telephone number for the contact person, Patsy Watson.

**Response:** The change was made as requested.

**Comment:**

II.B.6-15

4. The Florida Department of Environmental Protection's Emergency Response telephone number has been changed to (904) 413-9911. The Department's telephone number should also be listed under the fire/explosive section.

**Response:** The change was made as requested.

**Comment:**

II.B.6-31/4

5. The word "operating" (permit) should be changed to "closure". Similarly, make these changes for other appropriate sections in the application.

**Response:** The change was made as requested.

**Comment:**

II.B.6-34

6. Note that safety boots are required in the Safety and Emergency Equipment Inspection Checklist in Figure II.B-7.

**Response:** The change was made as requested.

**Comment:**

II.B.9-5/5

7. Please note that the Department's Tallahassee address has a zip code of 32399-2400.

**Response:** The change was made as requested.

**Comment:**

II.B.9-9/3

8. Please note that the Annual Hazardous Waste Report is now a biennial report pursuant to 40 CFR 264.75 and F.A.C. Rule 62-730.180(7).

**Response:** The change was made as requested.

**Comment:**

II.B.9-10/5

9. Please note that there is no information after "These notices are described below". Please provide this information.

**Response:** The information was provided as requested.

**Comment:**

II.D-9/2

10. Please provide a copy (or pertinent sections, if the report is large) of the May 23, 1995 remedial investigation report. Were any Appendix VII or IX analyses performed in association with either of the RCRA units? If so, on what type(s) of media? Please incorporate any other detailed information regarding sampling (soil, groundwater, and sediment) or remediation activities that have been performed at either spoil pile to date.

**Response:**

**Comment:**

Figure II.D-2

11. Does this drawing accurately depict all training pits within 50 feet of the RCRA treatment unit? How were the boundary lines of the RCRA unit and extent of the contamination study area determined?

**Response:** The drawing accurately depicts all training areas within 50 feet of the RCRA treatment unit. Applicant contacted EPA and asked for a definition of the term "unit", and EPA unable to provide said definition. This unit is in an active range that is managed under the Draft Range Rule currently being developed by EPA and DoD. Therefore, the boundary of the unit was determined to be the lip of the pit. Any contamination outside of the pit will be addressed under the Range Rule.

**Comment:**

II.D-12

12. Please provide the details of how the 1995 groundwater sample was taken. Include any construction details of the well (i.e., filter pack material and size) and the procedures used (sample equipment, turbidity values [if measured], amount of purging before sampling, etc.).

**Response:** No monitoring wells were installed on Demolition Key NW as part of previous investigations. The groundwater sample was collected using grab methods from boring SB-9. The sample was analyzed for volatile organics, PAHs, pesticides/PCBs and Appendix IX metals.

**Comment:**

II.D-14 & 20

13. All solids contaminated with hazardous constituents released from the unit must be removed or decontaminated. Removal beyond the five-foot limit discussed in the "Treatment Alternatives Section", page II.B-14, will be required for a clean closure demonstration, if the area beyond this five-foot limit has been impacted by the unit. Soil sampling (see page II.B-20) must include any area sufficient to show that soils left in place meet soil cleanup goals or post-closure care will be required. Soil sampling may be extended along the radials shown on Figure II.D-3. A location for a background soil sample should be designated. A background soil analysis may not be necessary if the facility can demonstrate that soil cleanup goals have been met

**Response:** In accordance with recent agreements, soil-related sampling and corrective action will focus on the immediate confines of the treatment pit. Due to the presence of training units in close proximity to the treatment pit, it was determined that possible impacts from these non RCRA pits could extend to the perimeter of the subject pit. These non-RCRA unit impacts would be indistinguishable from those of the subject pit. As a result, it was determined that any activities outside the immediate confines of the treatment pit would be predicated on cessation of training activities and would be dictated by the provisions of the Range Rule.

**Comment:**

II.D-15/3

14. Please provide the details of the benthic sediment sampling and analytical results referenced in this section..

**Response:** Two sediment samples (SS-1 and SS-2) were collected from the bottom of the channel between the northern and southern Key using SCUBA methods. The samples were analyzed for Appendix IX metals, volatile organics, PAHs and pesticides/PCBs. No volatile organics, PAHs or pesticides/PCBs were detected. Table II.D.5 presents metals results for these samples.

**Comment:**

II.D-16/3

15. Soil cleanup goals for the RCRA units are the concentrations under the residential scenario found in the September 29, 1995 Ruddell memo, *Soil Cleanup for Florida*, and the January 19, 1995 memo regarding arsenic goals. Copies are enclosed for your use. If the facility is unable to reach the concentrations under the residential scenario, then the facility may consider other options such comparison with background concentrations. The SPLP can be used for leachate analysis.

**Response:** Comment noted. As stated in the Closure Plan, the FDEP CGs will be employed as screening values for evaluating soil data. For this purpose, the closure plan has been modified to reflect that residential CGs will be employed. It should be considered, however, that CGs do not necessarily represent fixed point compliance criteria for remedial action nor do residential values apply universally. Due to the planned continued use of Demolition Key NW as a non-residential, infrequent use training facility, it is appropriate to develop site-specific remedial goals which meet the intended purpose of protecting human health and the environment as described in the closure plan.

**Comment:**

II.D-23-48

16. As mentioned in General Comment #2, please provide the quality assurance information in a separate site-specific Quality Assurance Project Plan (QAPP) using the enclosed DEP Form 62-160.900(1). The QAPP must include a specific list of constituents and parameters, each with its analytical method and detection level, for soil and water. In addition to the proposed soil analysis for the specified metals, petroleum hydrocarbons, and semivolatiles, please include Method 8330 constituents to complete the constituent list for determining clean closure of the units. The QAPP must include the same list of constituents for the groundwater analyses. Ensure that the EPA SW-846 methods chosen are capable of meeting final cleanup levels.

**Response:** DEP Form 62-160.900(1) has been completed and is included as Appendix F.

**Comment:**

II.D-24/3

17. Please ensure that the method chosen for each constituent is reliable enough for accuracy and precision since the results will be used to determine if the units are clean.

**Response:** The proposed analytical methods are consistent with those approved by FDEP. A FDEP certified laboratory with a current approved CompQAP will perform all analyses, and precision and accuracy goals will be those prescribed in SW-846 methods as approved by FDEP in the laboratory's QAP.

**Comment:**

II.D-33

18. The closure schedule is specified on this page. However, the schedule discussed on page II.D-34 conflicts with page II.D-33 and should be deleted.

**Response:** The change was made as requested.

**Comment:**

II.D-33

19. The Department does not agree at this time with the facility's implication that no groundwater monitoring is necessary because contamination has been detected in the soils. Please provide a groundwater monitoring plan for each unit in the application. Alternative methods of groundwater sampling, other than conventional RCRA monitoring wells, may be proposed as long as the sampling method is technically sound and reliable.

**Response:** The March 31, 1997 letter from FDEP responding to NAS Key West's position paper dated October 10, 1996 indicates that "...the synthetic leachate extraction procedure with analysis..." is an acceptable alternative to conventional groundwater monitoring for this unique site. This is the alternative that is being proposed in the revised closure plan.

**Comment:**

II.D-39

20. Soil samples may not be composited. Only discrete samples may be used to demonstrate clean closure. Are fuels used to aid in the initiation of detonation or burning at the OB/OD units? Have they been used in the past?

In addition, mercury, copper, and zinc must be analyzed in all soil and groundwater samples because it is commonly identified in the explosive casing listed in the closure permit application.

**Response:** Composite soil samples will not be used for characterization during the closure process. There has been speculation that diesel fuel or other petroleum products may have been used occasionally to initiate open burning treatment. As a result, TPH analyses will be performed on each soil sample. Mercury, copper and zinc have been added as analytical targets for total and leachable soil analysis (USEPA Method 8015 California Modified Diesel Range Organics).

**Comment:**

II.D-49

21. Because these are land units, a contingent post-closure plan is required. The RCRA closure permit will contain a condition requiring the facility to submit a final post-closure plan if it is determined that clean closure of the unit(s) cannot be achieved.

**Response:** Statement regarding post-closure plan submittal was added as requested.

**Comment:**

II.F-1

22. The training area is identified as a SWMU on page II.D-1 and should also be identified as a SWMU in this section.

**Response:** The change was made as requested.

## Filing Instructions

The instructions below should be followed carefully to ensure that your Final Demolition key Closure permit Application contains accurate and up-to-date information. Obsolete pages are listed in the column "Take Out Old Pages." New and replacement pages are listed in the column headed "Put In New Pages."

Keep the filing instructions sheet in the front of the report as a record of the changes. If you have any problems with missing pages or other questions regarding the filing of these errata pages, please call Chris Holmes at (919) 851-1886.

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