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NS MAYPORT  
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LETTER REQUESTING POSTPONEMENT OF HAZARDOUS AND SOLID WASTE  
AMENDMENT PERMIT RENEWAL NS MAYPORT FL  
5/9/2001  
NAVAL STATION MAYPORT



# DEPARTMENT OF THE NAVY

NAVAL STATION

MAYPORT, FLORIDA 32228-0112

IN REPLY REFER TO:

5090.12/.14

5090.15

Ser N4E/001271

BUREAU OF WASTE CLEANUP MAY 09 2001

MAY 14 2001

TECHNICAL REVIEW SECTION

Mr. Jim Cason  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Mr. Cason:

SUBJECT: RENEWAL OF HAZARDOUS AND SOLID WASTE AMENDMENT (HSA) PERMIT  
#FL9170024260, NAVAL STATION MAYPORT

Subject permit issued by the U.S. Environmental Protection Agency, Region Four, expires June 15, 2003. Naval Station (NAVSTA) Mayport understands that, due to the recent delegation of HSWA authority to the State of Florida, your Department plans to require permit renewal in 2001. We respectfully request postponement of this action until the summer of 2002 for the following reasons: First, the Corrective Action (CA) program at NAVSTA Mayport is very near completion. We are currently in the process of drafting ten Statements of Basis (SOB) and fifteen Corrective Measures Studies (CMS); we expect these to be final by the end of fiscal year (FY) 2001. Second, there are no FY 2001 funds for the permit renewal and none will be available until at least mid-FY 2002. To renew the HSWA permit in FY 2001, NAVSTA Mayport will have to reallocate funds from another regulatory required project.

Even if a FY 2001 reallocation is possible without incurring a violation, NAVSTA Mayport maintains that finalizing the major SOB and CMS documents will require a permit modification next year, FY 2002; this is another currently unfunded cost and an unnecessary process if you allow us to renew in FY 2002.

NAVSTA Mayport submits that a FY 2002 HSWA permit renewal application that includes the remaining portions of the CA program will provide a more complete document. Also, it will be more economical for both NAVSTA Mayport and your Department through reduced preparation and review costs and, finally, it will allow NAVSTA Mayport to use programmed funds.

Thank you for your consideration. If you have any questions, please contact Cheryl Mitchell, Environmental Director at 904-270-6730 x201.

Sincerely,

  
CHERYL L. MITCHELL  
Director, Environmental Division  
By direction of the  
Commanding Officer

Copy to:

U.S. Environmental Protection Agency, Region 4 (Craig Benedikt)  
Florida Department of Environmental Protection, Northeast District (E. Frey)  
Commander, Navy Region Southeast (N46E)  
Navy Public Works Center, Jacksonville (Code 300)  
Naval Facilities Engineering Command, Southern Division (Code 18)  
Naval Air Station, Jacksonville (Code 184 Bill Raspet)