



LC-00025-07.01-01/24/92



## COMMONWEALTH of VIRGINIA

### DEPARTMENT OF WASTE MANAGEMENT

11th Floor, Monroe Building

101 N. 14th Street

Richmond, VA 23219

(804) 225-2667

TDD (804) 371-8737

January 24, 1992

Mr. W. H. Russell, P.E.  
Director  
Environmental Quality Division  
Department of the Navy  
Atlantic Division  
Naval Facilities Engineering Command  
Norfolk, Virginia 23511-6287

Re: Letter 5090 1822:JPW

Dear Mr. Russell:

This letter is in response to your letter dated January 2, 1992, and the meeting held at the Department of Waste Management on January 8, 1992. The meeting was held to discuss the construction of a Commissary in the proximity of an Installation Restoration Site (# 12) at the Naval Amphibious Base, Little Creek.

The issues raised at the meeting included:

- 1) The proper disposal of storm pipe which had been used for disposal of waste dry cleaning solvents before 1978;
- 2) The need to remediate contaminated groundwater at the site;
- 3) The proper handling and disposal of water resulting from the construction activities, i.e., dewatering for the installation of the utilities at the site.

We have discussed these issues with the Department's Solid and Hazardous Waste staff and we have recommendations for the proper disposal of wastes generated in issues 1 and 3. We realize remediation of the contaminated groundwater (issue 2) at the site must await further determination and investigation.

The storm pipe, if it is free of sediment, debris or waste dry cleaning solvents may be disposed of as an inert waste (exempt from the Virginia Solid Waste Management Regulations) if the pipe is





LC-00025-7.01-01/24/92

Mr. W. H. Russell

Page 2

tested and the waste dry cleaning solvents are below the detection limit. If the storm pipe contains any sediment, debris or waste it must be tested to determine if it contains any listed hazardous waste. If the pipe contains listed hazardous waste, this material may be physically removed from the pipe, containerized and disposed of as a hazardous waste. Again the piping will need to be tested to determine if the listed hazardous waste is below detection limits.

Wastewater, which could be contaminated with listed hazardous waste, has been proposed to be treated through an air stripper unit and discharged to the Hampton Roads Sanitation District (HRSD) Publically Owned Treatment Works (POTW). We have been advised by our Hazardous Waste Permit Section that a system consisting of tank and tank-like elements providing treatment of hazardous waste prior to discharge to a POTW does not require a permit, providing it meets the definition of a wastewater treatment unit as defined in Part I of the Virginia Hazardous Waste Management Regulations (VHWMR). According to the regulations, "Wastewater treatment unit means a device which: is part of a wastewater treatment facility which is subject to regulation under either § 402 or § 307(b) of the Clean Water Act; and receives and treats or stores an influent wastewater which is a hazardous waste, or generates and accumulates a wastewater treatment sludge which is a hazardous waste, or treats or stores a wastewater treatment sludge which is a hazardous waste, and meets the definition of tank or tank system". We have contacted Lavern Corkan with the SWCB's Pretreatment Program and think that the system proposed is subject to regulation under § 307(b) of the Clean Water Act. If you would like to discuss the system directly with Ms. Corkan, her number is (804) 527-5002. The HRSD must also approve of the discharge. However, any residuals produced or generated by the system and not discharged must be handled as a hazardous waste if they contain listed hazardous waste. Any residuals may include sludges or sediments in the tank and/or packing or absorbent material in the columns.

We would also like to remind you that any Air Pollution Control Board requirements need to be addressed directly to that department-specifically the air stripping emissions.

If you should have any questions or need assistance in the future, please contact me at (804) 371-8712 or Anne Field at (804) 371-8713.

Sincerely,

*Erica S. Dameron*

Erica S. Dameron  
Environmental Engineer Consultant  
Division of Special Programs

cc: Hassan Vakili, DWM  
K. C. Das, DWM  
Jesse Waltz, LANTDIV

