



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

75 Davis Street
Providence, R.I. 02908

7 February 1984

Commander
Naval Education & Training Center
Newport, RI 02841

Dear Sir:

This letter will serve as a report on my initial review of the Naval Education and Training Center's application for a Hazardous Waste Treatment and Storage Facility (TSF) Permit. I have enclosed a copy of the Department's Rules and Regulations for Permitting and Operating Hazardous Waste Treatment and Storage Facilities, which include the requirements for a TSF Permit application.

I have tried to be as thorough as possible in my review of the application. However, this does not preclude the possibility that I may have more comments on the current application at a later time, or on any of your future submittals.

Rule 5.03 - Plan Requirements - All required plans must be stamped by a professional engineer or land surveyor registered with the State of Rhode Island.

Rule 5.04(d) - Photographs - You should include photographs of the actual hazardous waste storage areas. The aerial photographs already in your application should be marked to show facility locations.

Rule 5.04(f) - Process Description - You must list all the types and maximum amounts of hazardous waste you will be storing. This list will be restrictive, and should not conflict with any other lists of accepted waste in the application, e.g., in your waste analysis and closure plans. Asbestos should be deleted from the application because it is no longer considered a hazardous waste in Rhode Island.

Rule 5.04(g) - Groundwater Monitoring - Your submitted groundwater monitoring plan for the waste oil storage tanks will be reviewed separately. You must also address the groundwater monitoring requirement for your storage areas. If, as I assume, you request a waiver to this requirement, you must demonstrate that leakage or spillage of hazardous waste to the ground will be minimized to the greatest extent possible.

Rule 5.04(h) - Waste Description - You must include a chemical and physical description of the hazardous wastes to be accepted, as well as appropriate handling information.

Rule 5.04(i) - Waste Analysis - Your waste analysis plan includes many tests and procedures which are not applicable to the wastes you are proposing to accept. The waste analysis plan should be written specifically for NETC. For example, Table 2 on page 14 lists plating sludges from a drying bed. No mention of this material is made elsewhere in the application.

Rule 5.04(k) - Inspection Program - You should include sample inspection log sheets. These forms should indicate the item to be inspected, frequency of inspection, the type(s) of problems expected, and the remedial action taken, if necessary. The inspection process for the excess container storage area should include removing the top of the overpack drum to check for liquid in the annular space.

Your inspection schedule includes "Sump Pump Operation" for the secondary containment area. I assume this refers to your PCB storage area, but the description does not mention a sump pump. Correct this discrepancy.

Rule 5.04(l) - Preparedness and Prevention - This requirement was not addressed.

Rule 5.04(m) - Contingency Plan - Your permit application is considered a public document by this Department, and its contents cannot be considered confidential. You should either delete the "For Official Use Only" warning found on each page, or include a statement recognizing that the document is not classified in any way. If you wish, you may delete the radio frequencies which are included in the current application.

The application only lists one emergency coordinator. 40CFR 264.55 requires that someone be available at all times to act as an emergency coordinator. I would suggest that the security dispatchers, or their supervisor(s), if they would be readily available, act as emergency coordinators. Whoever you designate must be trained, and they must have the authority necessary to commit the facility's resources. These persons would not have to be identified by name in the application, but their names would have to appear on the training completion records.

The emergency procedures do not adequately address the most likely type of problem at NETC, i.e., a small spill of hazardous waste on the ground or in a storage area. Procedures for the containment and clean-up of such a spill should be included. The plan must also clearly state that the residues from clean-up operations must be disposed of properly.

Your list of emergency equipment must include the items' descriptions, capabilities, and location. NETC should have open-top drums and plastic sheeting available for spill clean-ups.

The plan should provide guidance for determining when DEM and EPA should be contacted. Specific reporting and notification requirements under RCRA are discussed in 40CFR 264.56. RIDEM's phone numbers are 277-2797 during the day, and 277-2284 nights and weekends. Also, be advised that two of the contractors listed on page 3 of your contingency plan are out of business. (Cannons and Acme).

Your contingency plan must describe any arrangements you have made with local emergency authorities, who must also be provided with copies of the plan. It should, therefore, be a self-contained document. It would be appropriate to include a brief description of NETC's hazardous waste activities.

Portions of the text of the plan discuss cost recovery for services rendered when an incident is not caused by the Navy. The contingency plan is intended to function as guidance during an actual emergency. I strongly suggest that, unless impossible, such non-essential portions of the plan be deleted and incorporated into some other document.

You must also include a statement that the plan will be amended when necessary. 40CFR 264.54 lists the events which would necessitate amendment.

The plan should be organized so that the emergency procedures and phone numbers are clearly accessible. The procedures should be written as simply as possible, and they should follow a logical order. The administrative sections of the plan should not be interspersed throughout the plan, as this might slow or confuse the reader.

Rule 5.04(n) - Hazard Prevention - This regulation is not addressed.

Rule 5.04(o) - Flammable Precautions - This regulation is not addressed.

Rule 5.04(p) - Traffic - This regulation is not addressed.

Rule 5.04(q) - Training - Your training plan must include the job titles, descriptions, and the names of those persons involved in the handling of hazardous waste. You may include sample forms in your application, but these records must be available for review during an inspection.

Rule 5.04(r) - Closure - Your closure plan does not indicate what the maximum inventory of your container storage area will be. This should be broken down into types of materials if possible. You do indicate a maximum inventory in the PCB storage area of 20 drums, but your description of the containment area shows that it was designed for a maximum of 50 drums. Neither of these figures takes into account the possible contents of intact transformers stored in the area. Correct these discrepancies. Also, the maximum inventory for the waste oil tanks is given as 2,520,000 gallons. This is the maximum volume for only one of the tanks. The regulations require that you provide an expected year of closure. Your indication of a closure year does not imply any commitment to close in that year; it may be changed later.

A deed notice is no longer a requirement of the Rhode Island TSF regulations; it may be deleted. Also, Section III of your closure plan is not applicable, as NETC does not operate a treatment process.

Rule 5.04(t) - Financial Assurance - Federal facilities are exempt from this requirement. You may, therefore, delete any and all references to closure costs from your application.

Rule 5.04(u) - Containers - You should include a plan of the storage areas, showing the extent and design of the containment systems. How is

drainage promoted, and how are the containers kept from contact with standing liquids? How have you provided for run-off control/prevention? How will you analyze and remove accumulated liquids to prevent overflow? If any incompatible wastes are to be stored, you must satisfy the requirements of 40 CFR 264.177.

How will you remove accumulated liquid from the annular space between overpack and container? What are the DOT specifications for the overpacks? The diagram showing this type of storage should indicate that both the drum and overpack have bottoms.

The method of containerization you propose for solid hazardous waste is inadequate. Asbestos is no longer considered a hazardous waste, however, so you might wish to delete this standard if you do not expect to be handling any other solid hazardous wastes.

Rule 5.04(v) - Tanks - All of the requirements of this section must be addressed. It is unclear if the storage tanks are lined, or what the shell thickness is. In addition, the operational requirements of 40CFR 264.194(b) would necessitate a periodic internal inspection of the tanks to determine their condition. This would be an extremely difficult and expensive procedure to accomplish. Groundwater monitoring of this activity will also be an expensive, and long-term, proposition. You should also be aware of the fact that EPA is considering issuing new tank performance standards under 40 CFR Subpart J, which would entail even more stringent requirements.

It is my strong suggestion, therefore, that NETC cease using these tanks for hazardous waste storage, and begin the closure process for these tanks. A new, aboveground tank could be used for storage. If the closure process was successful, and an internal inspection showed that leakage had not occurred, groundwater monitoring would not be necessary. If evidence of leakage was discovered, appropriate measures would then have to be discussed and agreed upon.

Rule 5.04(w) - Manifests - You should include a description of where the various manifest copies are sent, as described on the reverse side of the form.

Miscellaneous - Your application should indicate where all the various required records will be kept. References to our old regulations should be deleted. Page numbers would be extremely helpful during any subsequent correspondence, and during the public hearing.

NETC should respond to this letter by 20 April 1984. If you have any questions, please call me at 277-2797.

Sincerely,

Thomas Epstein,
Sanitary Engineer
Division of Air & Hazardous
Materials

TE/jad

cc: Marty Dwyer, NETC
Mike O'Brien, EPA

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