NBN-00333-01.02-08/18/90

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

AUG 16 1990

IN RESPONSE REPLY TO: 3HW52

OVERNIGHT MAIL

Commander Naval Base
Norfolk Naval Base
Code N9E, Building N-26
ATTN: Ms. Cheryl Barnett
Norfolk, VA 23511-6002

Reference: Norfolk Naval Base, Norfolk, Virginia;
EPA ID NO. VA6170061463
U.S. EPA, Region III, SITE VISIT

Dear Ms. Barnett:

Under the 1984 Hazardous and Solid Waste Amendments (HSWA), a RCRA Facility Assessment (RFA) is required of your facility. The objective of this assessment is to determine whether releases of hazardous waste or hazardous constituents have occurred or are occurring at your site. The assessment will determine if any such releases require further investigation to determine the need for corrective action.

The first step of the RFA is a Preliminary Review (PR) of available file material about your facility from files of the EPA and the Virginia Department of Waste Management. A PR has been completed by representatives of our RCRA implementation assistance contractor, A.T. Kearney. Enclosed please find a copy of the Preliminary Review Report for your facility. The PR Report is a summary of known information about production processes, waste generation, waste management, releases, and environmental setting. The report also contains descriptions of your facility's Solid Waste Management Units (SWMUs), which were identified from the available file material. Please note that the PR Report is a preliminary report which has not been formally reviewed by EPA.

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The second step of the RFA is a visual site inspection (VSI) of your facility to verify the locations of all SWMUs, determine their condition by visual observation, and fill any information gaps identified during the PR. The VSI is scheduled for September 10-12, 1990 the personnel will consist of U.S. EPA Region III, A.T. Kearney and Virginia Department of Waste Management representatives. The assistance of some of your personnel in reviewing current and past solid waste management practices during the inspection may be required. Color photographs of each SWMU are to be taken to document the condition of units at the facility and the waste management procedures used.

Also enclosed is a copy of the VSI Agenda which includes an attachment listing preliminary information needs for the RFA. In addition, the PR Report has information needs listed for each SWMU or potential SWMU in the Description of SWMUs section. To prepare for the VSI, please develop a response for each of the information needs listed in the VSI Agenda Attachment and the PR Report. The responses which should be presented at the time of the VSI, also should include two copies of a large SWMU location map containing locations of all SWMUs identified in the PR Report. Responses should be certified per 40 CFR Section 270.1(d) by a person who meets the requirements of 40 CFR Section 270.11(a). If you like, you can also provide comments or clarifications on the validity of the information contained in the PR Report.

In preparation for the VSI, the inspection personnel are required to identify any potentially hazardous conditions likely to be encountered at the site during performance of the VSI and to prepare a safety plan that deals with hazards, if necessary. You will be contacted by a member of my staff to obtain specific information on the levels of personal protection required and the material handled in each area of your facility.

Should you have any questions regarding this letter, please contact Mr. David Turner of my staff at 215-597-7259.

Sincerely,

John J. Humphries III, Chief
General States Permits Section

2 Enclosures

cc: D. Turner, EPA Region III
M. Habibi, Virginia Department of Waste Management
J. Atchue, ATK
J. Surfus, ATK

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RCRA FACILITY ASSESSMENT
PROPOSED VISUAL SITE INSPECTION AGENDA

FACILITY: Norfolk Naval Base
Building N-26, Gilbert Street
Norfolk, VA 23511-6002

EPA I.D. NO.: VA6170061463

FACILITY CONTACT: Cheryl Barnett
804-444-3009

DATE OF INSPECTION: September 10-12, 1990

PERSONNEL: Dave Turner, U.S. EPA, Region III
Mohammad Habibi, Virginia Department of Waste Management
Jeff Surfus, Kearney-Centaur, Inc.
Sujata Aji, Kearney-Centaur, Inc.
Deborah Schechter, A.T. Kearney, Inc.
Molly O'Neill, A.T. Kearney, Inc.

PURPOSE OF INSPECTION:

The Hazardous and Solid Waste Amendments of 1984 (HSWA) broaden the Scope of the Environmental Protection Agency's (EPA's) authority under the Resource Conservation and Recovery Act (RCRA) by requiring corrective action for releases of hazardous wastes and constituents at facilities that manage hazardous wastes. The RCRA Facility Assessment (RFA) is conducted to evaluate the potential for releases to the environment and the need for corrective action. The corrective action authority extends to all solid waste management units (SWMUs) and other areas of concern (AOCs) which may be potential sources of releases at the facility.

The RFA includes a desk-top preliminary review (PR) of available file information, a visual site inspection (VSI) of the facility, and, if necessary, a sampling visit. Based on the review of available data for this facility, it has been determined that a VSI is necessary. The purpose of the VSI is:

1. To collect all available relevant information on solid waste management practices that have been used on the site;

2. To gain first-hand information regarding the identification, location, construction, configuration, function served, method of operation, and condition of each SWMU and AOC;

Encl 1

3. To confirm, by visual inspection and discussion with facility representatives, information collected during the PR;

4. To survey the site for additional SWMUs and AOCs not identified in the review of file material;

5. To identify potential sample points for possible future sampling activities;

6. To review the site information and collect additional information to address the information needs identified during the PR; and

7. To take photographs of all SWMUs and other AOCs.

INSPECTION ORGANIZATION:

Two-member field teams will perform the VSI. Due to the size of the facility and the tentative number of SWMUs and AOCs identified, a three-day inspection is anticipated. The teams will inspect all past and current solid waste and hazardous waste handling, storage, treatment, and disposal areas on site. Outdoor and indoor waste generation, collection, and accumulation areas will be inspected as necessary to acquire a complete understanding of waste streams, waste flows, and waste handling procedures.

The teams will also identify, inspect, and document potential pathways for release of hazardous constituents into the environment. Facility staff will be interviewed to develop a better understanding of past and current waste management practices. Any available environmental monitoring or sampling data for characterization of the soils, ground water, surface water (or runoff), and air quality at the site, will also be reviewed.

The overall rationale of this inspection is to enable the team to trace the waste flow through the entire facility from the points of generation to ultimate disposal. Attachment I presents the VSI schedule which has been prepared based on the preliminary file review. Some adjustments to the proposed agenda may be necessary to accommodate facility staff, operational constraints, or unforeseen conditions. This proposed schedule will be reviewed during the introductory meeting and adjusted, if necessary, at that time. The VSI field team will make every reasonable effort to conform to the facility's normal hours of operation.

Attachment II presents the list of potential SWMUs and AOCs which was developed based on the preliminary file review. If any units or areas no longer exist, the locations of the former units and areas should be identified by facility representatives during

the VSI. Likewise, any other units or areas where solid wastes, both hazardous and nonhazardous, are treated, stored, or disposed (and areas where potentially hazardous materials are stored, handled, and transferred) should be identified by facility representatives during the VSI.

Attachment III presents the List of Additional Information Needs to be discussed in the introductory meeting at the VSI.

ATTACHMENT I

PROPOSED INSPECTION SCHEDULE

Day 1 -

8:30 am	Arrive at facility
8:30 am - 9:15 am	Introductory meeting with Norfolk Naval Bas personnel to discuss: • Purpose of visit • Agenda • Safety and health considerations • Facility history and operations • Additional information needs relating to general facility operations, history of site, environmental setting, waste management practices, and SWMUs.
9:15 am - 12:00 pm	Form two inspection teams. Begin walk-through inspection of the SWMUs and AOCs in the north portion of the site. Tour (briefly) process buildings and and associated areas in the north half of the site, focusing on waste generation points.
12:00 pm - 1:00 pm	Break for Lunch
1:00 pm - 5:00 pm	Complete inspection of the SWMUs and AOCs in the north portion of the facility.

Day 2 -

8:30 am - 9:00 am	Fill in any information gaps relating to the SWMUs or AOCs inspected on Day 1, or other questions related to facility operations.
9:00 am - 12:00 pm	Begin inspection of the SWMUs and AOCs in th central portion of the site. Tour (briefly) process buildings and associated areas in th central portion of the site, focusing on waste generation points.
12:00 pm - 1:00 pm	Break for Lunch
1:00 pm - 5:00 pm	Complete inspection of the SWMUs and AOCs in the central portion of the facility.

ATTACHMENT I

PROPOSED INSPECTION SCHEDULE (Cont'd)

Day 3 -

8:30 am - 9:00 am	Fill in any information gaps relating to the Day 2 inspection.
9:00 am - 12:00 pm (briefly)	Begin inspection of the SWMUs and AOCs in the south portion of the site. Tour process buildings and associated areas in th south portion of the site, focusing on waste generations points.
12:00 pm - 1:00 pm	Break for Lunch
1:00 pm - 5:00 pm	Complete inspection of the SWMUs and AOCs in the south portion of the facility.

ATTACHMENT II

PRELIMINARY LIST OF SWMUs AND AOCs

Solid Waste Management Units

Landfills

CNB
1. Camp Allen Landfill (IAS Site 1)
2. CD Landfill (IAS Site 6)
3. Inert Chemical Landfill (IAS Site 7)
4. Asbestos Landfill (IAS Site 8)
5. Q Area Landfill (IAS Site 9)

Container Storage Areas - RCRA

NAD
6. Building LF-68 (18) Interim Status Hazardous Waste Container Storage Area
7. Building LP-159 Interim Status H.W. Container Storage Area
8. Building LF-38 Emergency Interim Status H.W. Container Storage Area

HUC
9. Building SDA-215 Interim Status H.W. Container Storage

Container Storage Areas - Naval Station

CNB
10. Building FRP-14 Hazardous Waste Accumulation Area
11. Building KCC Hazardous Waste Accumulation Area
12. Building DS-31 Hazardous Waste Accumulation Area
13. Building CA-483 Hazardous Waste Accumulation Area
14. Building CA-11 Hazardous Waste Accumulation Area
15. Building LAG-35 Hazardous Waste Accumulation Area
16. Building W-7 Hazardous Waste Accumulation Area
17. Building U-115 Hazardous Waste Accumulation Area
18. Building CEP-188 Hazardous Waste Accumulation Area

ATTACHMENT II

PRELIMINARY LIST OF SWMUs AND AOCs (Cont'd)

Container Storage Areas - Naval Air Station

19. Building SP-1 Hazardous Waste Accumulation Area
20. Building SP-2A Hazardous Waste Accumulation Area
21. Building SP-2B Hazardous Waste Accumulation Area
22. Building SP-10 Hazardous Waste Accumulation Area
23. Building SP-31 Hazardous Waste Accumulation Area
24. Building SP-241 Hazardous Waste Accumulation Area
25. Building NM-37 Hazardous Waste Accumulation Area
26. Building LP-2 Hazardous Waste Accumulation Area
27. Building LP-3 Hazardous Waste Accumulation Area
28. Building LP-4 Hazardous Waste Accumulation Area
29. Building SP-12 Hazardous Waste Accumulation Area
30. Building LP-13 Hazardous Waste Accumulation Area
31. Building LP-14 Hazardous Waste Accumulation Area
32. Building LP-Fuel Farm Hazardous Waste Accumulation Area
33. Building U-96 Hazardous Waste Accumulation Area
34. Building S-33 Hazardous Waste Accumulation Area
35. Building LF-60 Hazardous Waste Accumulation Area
36. Building V-10 Hazardous Waste Accumulation Area
37. Building V-36 Hazardous Waste Accumulation Area
38. Building V-58 Hazardous Waste Accumulation Area

Container Storage Areas - Naval Aviation Depot

39. Building LF-34 Hazardous Waste Accumulation Area
40. Building LF-51 Hazardous Waste Accumulation Area
41. Building LF-53A (NE) Hazardous Waste Accumulation Area
42. Building LF-53B (E) Hazardous Waste Accumulation Area
43. Building V-4 Hazardous Waste Accumulation Area

ATTACHMENT II

PRELIMINARY LIST OF SWMUs AND AOCs (Cont'd)

Container Storage Areas - Naval Aviation Depot (Cont'd)

44. Building V-28A (W) Hazardous Waste Accumulation Area
45. Building V-28B (W) Hazardous Waste Accumulation Area
46. Building V-28C (NW) Hazardous Waste Accumulation Area
47. Building V-28D (NW) Hazardous Waste Accumulation Area
48. Building V-28E (SE) Hazardous Waste Accumulation Area
49. Building V-28F (SE) Hazardous Waste Accumulation Area
50. Building V-28G (NE) Hazardous Waste Accumulation Area
51. Building V-31 Hazardous Waste Accumulation Area
52. Building V-38A Hazardous Waste Accumulation Area
53. Building V-38B Hazardous Waste Accumulation Area
54. Building V-38C Hazardous Waste Accumulation Area
55. Building V-42 Hazardous Waste Accumulation Area
56. Building V-88 Hazardous Waste Accumulation Area
57. Building V-114 Hazardous Waste Accumulation Area
58. Building V-143 Hazardous Waste Accumulation Area
59. Building V-147A (SE) Hazardous Waste Accumulation Area
60. Building V-147B (S) Hazardous Waste Accumulation Area
61. Building LP-20A Hazardous Waste Accumulation Area
62. Building LP-20B Hazardous Waste Accumulation Area
63. Building LP-23 Hazardous Waste Accumulation Area
64. Building LP-167 Hazardous Waste Accumulation Area
65. Building LP-178/179 Hazardous Waste Accumulation Area
66. Building LP-201 Hazardous Waste Accumulation Area
67. Building U-132 Hazardous Waste Accumulation Area

ATTACHMENT II

PRELIMINARY LIST OF SWMUs AND AOCs (Cont'd)

Container Storage Areas - HQ and Service Battalion Fleet Marine Force

68. Building M-65 Hazardous Waste Accumulation Area
69. Building MCA-9 Hazardous Waste Accumulation Area

Container Storage Areas - Armed Force Staff College

70. Building SC-401A (rear) Hazardous Waste Accumulation Area
71. Building SC-401B (front) Hazardous Waste Accumulation Area
72. Building SC-401C (pistol range) Hazardous Waste Accumulation Are

Container Storage Areas - Fleet Training Center

73. Fire Fighting School Hazardous Waste Accumulation Area

Container Storage Areas - Other

74. Q Area Drum Storage Yard (IAS Site 3)
75. Transformer Storage Area (IAS Site 4)
76. Former NM Hazardous Waste Storage Area (IAS Site 18)
77. Camp Allen Hazardous Waste Management Area
78. Building SDA-204 Hazardous Waste Management Area
79. Building SDA-211 Hazardous Waste Management Area
80. No. 93300 (Paint Shop) Hazardous Waste Accumulation Area
81. Building LP-27 Hazardous Waste Accumulation Area
82. Building LP-28 Hazardous Waste Accumulation Area
83. Building W-318 PCB Storage Area
84. Building X-318 PCB Storage Area

ATTACHMENT II

PRELIMINARY LIST OF SWMUs AND AOCs (Cont'd)

Tanks

85. SIMA Waste Tank No. 1 (ME Rm. No. 1)
86. SIMA Waste Tank No. 2 (Building 31E)
87. SIMA Waste Tank No. 3 (Building 51F)
88. SIMA Waste Tank No. 4 (Building 64A)
89. SIMA Waste Tank No. 5 (Building FC-Repair Shop)
90. SIMA Waste Tank No. 6 (Building 72D)
91. SIMA Waste Tank No. 7 (Building 31C)
92. SIMA Waste Tank No. 8 (ME Rm. No. 6)
93. Heptane UST No. 1
94. Heptane UST No. 2
95. Heptane UST No. 3
96. Heptane UST No. 4
97. Heptane UST No. 5
98. Heptane UST No. 6
99. Heptane UST No. 7
100. Heptane UST No. 8
101. Heptane UST No. 9
102. Heptane UST No. 10
103. Heptane UST No. 11
104. Heptane UST No. 12
105. V-93-1 Waste Oil Tank
106. V-93-2 Waste Oil Tank
107. V-93-3 Waste Oil Tank
108. Building V-49 Waste Oil Bowser
109. Engine and Propeller Repair Shops Waste Oil Bowser
110. Buildings SP-145 and SP-147 Waste Oil Bowser

ATTACHMENT II

PRELIMINARY LIST OF SWMUs AND AOCs (Cont'd)

Wastewater Treatment Plant

111. Building LP-178/179 Industrial Waste Treatment Plant
112. Fire Fighting Industrial Wastewater Treatment Plant

Incinerators

PWC 113. Salvage Fuel Boiler Site
CNB – 114. Incinerator (Brig Location)

Disposal Areas

115. Pesticide Disposal Site (IAS Site 5)
116. Apollo Fuel Disposal Sites (IAS Site 10)
117. Alleged Mercury Disposal Site (IAS Site 12)

Spill Areas

118. Underground Oil Spill - Piers 4,5,7 (IAS Site 14)
119. Underground Oil Spill - Piers 20,21,22 (IAS Site 15)

Waste Piles

120. Slag Pile (IAS Site 2)

Wash Racks

DPW 121. Building A-80 Vehicle Wash Rack 1
122. Building A-80 Vehicle Wash Rack 2
123. Building A-81 Vehicle Wash Rack 1

ATTACHMENT II

PRELIMINARY LIST OF SWMUs AND AOCs (Cont'd)

Other Units

124. Building V-28 Abandoned Plating Shop (Tank/Containers)
125. Building LP-20 Abandoned Plating Shop (Tank/Containers)
126. Building V-28 Oil Water Separator
127. Building V-28 Dumpster
128. Instrument Repair Shop Drains (IAS Site 11)
129. Past Industrial Wastewater Outfalls (IAS Site 13)
130. Storm Sewer System
131. Building V-49 Oil Water Separator
132. Building W-143 Dumpster
133. Sanitary Sewer System

Areas of Concern

A. Chemical Fire - Building X-136 (IAS Site 16)
B. Chemical Fire - Building SDA-215 (IAS Site 17)

PWC

ATTACHMENT III
PRELIMINARY INFORMATION NEEDS FOR RCRA FACILITY ASSESSMENT

1. Identify past or present SWMUs which have not been identified in the VSI Agenda. Include a brief description of wastes managed in these units, the period of operation, unit dimensions, location, operating information, release controls, and history of releases. Units to identify include, but are not limited to, the following:

   - Aboveground and underground waste storage tanks.
   - Abandoned storage tanks.
   - Waste storage units for solid and hazardous wastes which fall under the 90-day RCRA exemption.
   - All waste handling areas and associated activities including loading zones, transfer areas, and waste accumulation areas.
   - All former waste treatment units or disposal areas.

2. Provide process flow diagrams and descriptions of facility procedures, specifically those procedures used to manage waste.

3. Provide a history of land and building use at the site, including:

   - Land ownership and use prior to acquisition by the U.S. Navy.
   - Any changes in facility operations, particularly those which resulted in changes in the wastes generated on-site.

4. Identify any areas of past spills or leaks and provide a description of any clean-up actions taken.

5. Provide any available information characterizing ground water (depth, flow direction) and local geology.

6. Provide the most recent ground-water quality data from monitoring wells at the facility.

7. Provide a facility map which clearly shows the locations of all SWMUs/AOCs (include those identified in Attachment II as well as any additional units), facility buildings, and the property boundary.