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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Office of Waste Permitting

Technical Services Division.

February 5, 1998

Certified Mail
Return Receipt Requested

James F. Harris, P.E.
Remedial Project Manager
Installation Restoration Section (North)
Environmental Division, Code 1822
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Va 23511-2699

Re: Naval Air Station (NAS) Oceana, SWMU 15, EPA ID # VA2170024606

Dear Mr. Harris:

This letter is a request for RCRA related information concerning the proposed Biotreatment Facility for soils at SWMU 15. As you will recall, we briefly discussed RCRA Regulatory issues relative to SWMU 15 at our last meeting with EPA that I attended in Philadelphia, PA., on April 30, 1997. Additional information is required in order to determine the regulatory status of the SWMU 15 Biotreatment Facility.

Accordingly, please submit Oceana's response to the following within 21 days of your receipt of this letter:

1. Describe each waste stream that is actually treated, stored, disposed or proposed for treatment, storage, or disposal at the Biotreatment Facility. Include the chemical composition of each waste stream, the mass generation rate of each waste stream, the point(s) of origin of each waste stream, generation processes of each waste stream, descriptions of intermediate treatment and intermediate storage operations relative to each waste stream, and the history of each waste stream inclusive of a chronology and describing changes in these elements over time.
2. Are any of the waste streams that are actually treated, stored, disposed or proposed for treatment, storage, or disposal at the Biotreatment Facility listed or characteristic hazardous wastes according to the Virginia Hazardous Waste Management Regulations (VHWMR), § 6.1 (9 VAC 20-60-340)? Did the status of any waste stream change relative to characterization as a listed or hazardous waste at any time during its history? For any of the subject waste streams, please describe the rationale in detail relative to any changes in characterization as a hazardous or nonhazardous solid waste.

Mr. James F. Harris, PE - OCEANA NAS, SWMU 15 Status

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3. For the hazardous waste actually treated, stored, disposed or proposed for treatment, storage, or disposal at the Biotreatment Facility; is:
 - A. Hazardous waste received from off-site locations and stored in units such as containers, tanks, surface impoundments, waste piles or containment buildings. The definition of off-site is contained within the VHWMR on page 1-14 ?
 - B. Hazardous waste treated by any number of processes, which are designed to change the physical, chemical, or biological character or composition of the waste so as to render the waste nonhazardous, less hazardous, safer to transport, safer to store, safer to dispose of, or reduced in volume?
 - C. Hazardous waste disposed of by means of depositing, injecting, dumping, spilling, leaking or placing these wastes into or on any land or water so that the waste or any of its constituents may enter the air or waters (including groundwater)?
4. On a facility-wide basis, is hazardous waste generated in a volume greater than 1000 kg. per month and accumulated on site for longer than 90 days, or generated in a volume between 100 and 1000 kg. per month and accumulated on-site for longer than 180 days?

If you have any questions or comments regarding this letter, please do not hesitate to call me at (804) 698-4194. Your cooperation will be appreciated.

Sincerely,



Russell L. McAvoy, Jr., M. S., PE
Environmental Engineer Senior

cc: Paul Farrell, DEQ
Linda Holden, EPA Region III
Melissa Porterfield, DEQ
Claire Ballard, DEQ
DEQ-TRO, Lisa Lillis
Central Hazardous Waste File