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NAS CECIL FIELD
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LETTER REGARDING EMERGENCY PERMIT ORDER AND PUBLIC NOTICE FOR THE
DEACTIVATION OF MUNITIONS AT NAS CECIL FIELD FL
12/6/2011
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

December 6, 2011

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Sent Via E-mail

mark.e.davidson@navy.mil

Mark Davidson
BRAC PMO SE
4130 Faber Place Drive, Suite 202
North Charleston, SC 29405

SUBJECT: Former Naval Air Station Cecil Field; EPA ID No. FL5 170 022 474
Emergency Permit No.0013526-HE-011

Dear Mr. Davidson,

Enclosed you will find an emergency permit order, along with the public notice. Please ensure that publication of the attached public notice is within the time allotted.

Please contact Anthony Tripp at (850) 245-8766 or Anthony.Tripp@dep.state.fl.us if you have any comments or questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim J. Bahr".

Tim J. Bahr, Administrator
Hazardous Waste Regulation Section

cc (with enclosures):

Karen Knight, EPA/Region 4, Knight.Karen@epamail.epa.gov
Ashwin Patel, Jacksonville/FDEP, Ashwin.Patel@dep.state.fl.us
Michael Halil, CH2M Hill, Michael.halis@ch2m.com
Jeffery Marks, CH2M Hill, Jeffery.marks@ch2m.com
Rusty Chandler, Jacksonville Airport Authority, RChandler@jaa.aero
David Grabka, FDEP, David.Grabka@dep.state.fl.us
Art Sanford, BRAC PMO SE, art.sanford@navy.mil



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BEFORE THE STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

In Re:)
Request for an Emergency Permit by)
Base Realignment and Closure Program Management)
Office Southeast)
4130 Faber Place Drive)
Suite 202)
North Charleston, SC 29405)

December 5, 2011

Permit Number:
0013526-HE-011

FINAL ORDER

BY THE DEPARTMENT:

The Department received an application for an emergency treatment permit on December 2, 2011, from Mark Davidson, Base Realignment and Closure Program Management Office Southeast (BRAC PMO SE) Base Closure Manager, North Charleston, South Carolina. The request is for the thermal treatment/destruction of hazardous waste. The treatment involves deactivation or destruction of a reactive waste, (i.e., recovered munitions and explosives of concern [MEC]) that present an unacceptable hazard for transportation to a disposal site. The devices present an imminent hazard to persons and property in proximity to the devices. While the devices present a potential imminent threat to life, property, human health and the environment they do not require immediate response activities to eliminate or address the actual or potential imminent threat. BRAC PMO SE has requested an emergency permit in accordance with Subpart M of 40 CFR Part 266 with the waste military munitions subject to the jurisdiction of the Department of Defense Explosives Safety Board. The treatment will be carried out within the next 60 days, but no later than 90 days from the date this document is issued, by the Naval Ordnance Safety and Security Activity (NOSSA), BRAC PMO SE, and the BRAC PMO SE Munitions Response/Explosive Ordnance Disposal (EOD) Contractor (AGVIQ-CH2M Hill Constructors, Inc. [AGVIQ-CH2M HILL] with USA Environmental, Inc. [USAE]) at the Hanger 860 Munitions Response Area (MRA) located at the former Naval Air Station Cecil Field, Jacksonville, Florida at latitude: 30°13'12.52"North; longitude: 81°53'43.00"West.

FINDINGS OF FACT

1. The specific wastes found during the munitions response completed at the Building 265 and hanger 860 munitions response area (MRA) from November 7, 2011 to December 12, 2011 to be thermally treated/destroyed by detonation are the following:

- a. Approximately (5) each 20-mm Cartridge Case (live primer only) consisting of an electrical primer only (projectile and propellant are missing) (approximate net explosive weight [NEW] 0.0031 lbs.) contained in a steel or brass cartridge case without a projectile.
 - b. Approximately (5) each U.S. Projectile, 20-mm, TP, M99 consisting of a percussion primer and propellant (approximate NEW 0.08 lbs.) contained in a steel or brass cartridge case with an inert target practice projectile.
 - c. Approximately (5) each U.S. Projectile, 20-mm, M95 consisting of an electric primer and propellant (approximate NEW 0.007 lbs.) contained in a steel or brass cartridge case with an inert target practice projectile.
 - d. Approximately (1) each MK 23 Practice Bombs containing MK 4 Signal Cartridge consisting of a percussion primer which initiates red phosphorous smoke charge (approximate NEW 0.19 lbs) contained in a metal cartridge.
 - e. Approximately (5) each CCU-41/B, Cartridge Impulse consisting of an electric primer and propellant (approximate NEW 0.0101 lbs.) contained in a metal cartridge.
 - f. Approximately (5) each CCU-44/B, Cartridge Impulse consisting of an electric primer and propellant (approximate NEW 0.0101 lbs.) contained in a metal cartridge.
 - g. Approximately (5) each CCU-45/B, Cartridge Impulse consisting of an electric primer and propellant (approximate NEW 0.0101 lbs.) contained in a metal cartridge.
 - h. Approximately (5) each U.S. Projectile, 20-MM, HEI, M56, consisting of an electric primer and propellant (approximate NEW 0.12 lbs) contained in a steel or brass cartridge case with an inert target practice projectile.
 - i. Approximately (5) each MK 2, Cartridge Impulse consisting of an electric primer and propellant (approximate NEW 0.02 lbs.) contained in a metal cartridge.
 - j. Approximately (5) each Signal, Illumination AN-M40A2 consisting of a percussion primer, propellant, and illuminant (approximate NEW 0.14375 lbs.) contained in a metal cartridge.
 - k. Approximately (25) each Small Arms consisting of a percussion primer and smokeless powder (approximate NEW 0.0343 lbs.) contained in a metal cartridge.
2. The treatment by thermal destruction of the wastes identified in Findings of Fact #1 of this permit will be carried out by NOSSA, BRAC PMO SE, and the BRAC PMO SE Munitions Response/EOD Contractor (AGVIQ-CH2M HILL with USAE) at the Hanger 860 MRA located at the former Naval Air Station Cecil Field, Jacksonville, Florida at latitude: 30°13'12.52"North; longitude: 81°53'43.00"West.

3. The wastes identified in Findings of Fact #1 are unsafe to transport for disposal. Because of the flammable, shock sensitive, reactive, and explosive nature of the material, there is a potential danger to the health and welfare of those persons coming in contact with this waste if the waste is not handled in a proper manner.

CONCLUSION

Based on the above-stated facts, the Department finds that the hazardous waste presents an imminent hazard to persons and property in its proximity if transported offsite for disposal. The waste specified in Findings of Fact #1 shall be thermally treated in an environmentally sound and Department-approved manner. Therefore, pursuant to Sections 403.726(5) and 120.59(3), Florida Statutes, it is hereby

ORDERED

1. The Permittee shall undertake whatever action necessary to comply with Rule 62-730.320, Florida Administrative Code.
2. NOSSA, BRAC PMO SE, AGVIQ-CH2M HILL and USAE will treat the imminent hazard identified in Findings of Fact #1 by thermal destruction of the unstable, flammable, shock-sensitive, and potentially explosive hazardous waste.
3. Only the waste specified in Findings of Fact #1 shall be thermally treated to deactivate or destroy the hazardous nature of the waste.
4. The hazardous waste will be treated via detonation in a field within the Hanger 860 MRA located at the former Naval Air Station Cecil Field, Jacksonville, Florida, specifically at latitude: 30°13'12.52"North; longitude: 81°53'43.00"West. The property is currently owned by :
Jacksonville Airport Authority – Cecil Field
ATTN: Mr. Rusty Chandler, Airport Manager
13365 Aeronautical Circle
Jacksonville, Florida 32221
The closest permanent residences are in the Cecil Pines Housing Area that is located approximately 4,400 feet from the treatment site.
5. Thermal treatment will be accomplished in accordance with Subpart M of 40 CFR Part 266, the Military Munitions Rule. The thermal treatment of the items listed in Findings of Fact #1 will be accomplished in accordance with the "Work Plan, Munitions Response for Discarded Military Munitions at Building 365 and Hanger 860 Munitions Response Areas" Revision No.00 dated March 2010, Revision No. 01 dated March 2011, and Revision No. 02 dated October 2011; and the project Explosives Safety Submission, Correction No. 01, Dated September 2011.

6. The general procedure used to thermally treat and destroy the items listed in Findings of Fact #1 will be to use 0.75-lb. PETN boosters to thermally treat and destroy the items. Multiple items will be secured around the boosters. The boosters will then be segregated into treatment/detonation events not to exceed 6 lbs. NEW. The boosters will be initiated with a detonation cord and/or blasting caps depending on the composition of the treatment/detonation event. All treatment/detonation events will be done with protective works/engineering controls by surrounding with an enclosure which has 24 inches of sand bags on the roof and walls.
7. The Permittee shall obtain all other local, state and federal approvals and licenses required for conducting the activities described in this permit.
8. Any visible residue or debris resulting from the treatment process shall be removed and properly disposed of by approved methods. Post-treatment soil sampling will be completed to ensure no contamination remains following residue/debris removal. The number of soil samples will be determined based on the number of treatment sites. Laboratory analysis of each of the soil samples from the treatment site for metals and nitro aromatics (explosives) is planned.
9. Adequate fire and personal protection to assure confinement and control of any fire resulting from the operation, and to prevent injuries of personnel present, will be provided.
10. Prior to the thermal treatment, the treatment site shall be secured and access restricted except to authorized personnel. Additionally, prior to the treatment operation, the Permittee will perform a visual inspection within a minimum 200-foot radius of the treatment site to assure that no unauthorized personnel are on site. Based upon the engineering controls calculations provided in the "Work Plan, Munitions Response for Discarded Military Munitions at Building 365 and Hanger 860 Munitions Response Areas", Revision No. 00 dated March 2010, Revision No. 01 dated March 2011, and Revision No. 02 dated October 2011; and the project Explosives Safety Submission, Correction No. 01, dated September 2011, for the given NEW, an enclosure which has 24 inches of sand bags on the roof and walls would have a maximum sandbag throw of 135 feet and would require a safety arc of 200 feet. The project Explosives Safety Submission, Correction No. 01, dated September 2011 provides the detailed engineering controls and calculations.
11. Within 60 days of completion of the thermal treatment authorized by this permit the Permittee shall submit to the Department a detailed, written summary of the specific description of the actual procedures used for treatment, and the disposition of any residues from the treatment process, as well as any additional pertinent information. This summary shall be submitted to the Florida Department of Environmental Protection

Florida Department of Environmental Protection, Northeast District
ATTN: Waste Program Administrator
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

PERMITTEE: Base Realignment and Closure Program Management Office Southeast
4130 Faber Place Drive, Suite 202
North Charleston, SC 29405

I.D. NUMBER: FL5 170 022 474
Permit Number 0013526-HE-011

and

Florida Department of Environmental Protection
ATTN: Environmental Manager
2600 Blair Stone Road
Mail Stop 4560
Tallahassee, Florida 32399-2400

12. Thermal treatment of the waste as specified above in Findings of Fact #1 of this permit shall take place within 60 days from the date this document is issued, and no later than 90 days from the date this document is issued.
13. The local Department of Environmental Protection Northeast District representative or its designee shall be notified at least 2 days before the beginning of the disposal operation and have the option of being present to observe the thermal treatment operation.
14. Pursuant to Rule 62-730.220(2), of the Florida Administrative Code (F.A.C.), the attached Public Notice No. 0013526-HE-011 shall be published one time only in the legal ad section of a local newspaper in Duval County within 30 days of permit issuance. Proof of publication shall be provided to the Department within 14 days of publication of the notice.
15. This permit expires 90 days after the issuance date.

PERMITTEE: Base Realignment and Closure Program Management Office Southeast
4130 Faber Place Drive, Suite 202
North Charleston, SC 29405

I.D. NUMBER: FL5 170 022 474
Permit Number 0013526-HE-011

Issued December 6, 2011

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**



**JOHN A. COATES, P.E., CHIEF
BUREAU OF SOLID AND HAZARDOUS WASTE**

Filing and Acknowledgment

Filed on this date, pursuant to Section 120.52, Florida Statutes, with the designated Clerk, receipt of which is acknowledged.



CLERK

December 6, 2011

DATE

PUBLIC NOTICE 0013526-HE-011

**STATE OF FLORIDA
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
2600 BLAIR STONE RD
TALLAHASSEE, FLORIDA 32399**

PERMIT NO. 0013526-HE-011

**NOTICE OF INTENT TO ISSUE AN EMERGENCY PERMIT UNDER
THE RESOURCE CONSERVATION AND RECOVERY ACT
AND THE FLORIDA RESOURCE RECOVERY AND MANAGEMENT ACT.**

The Department of Environmental Protection (DEP) gives notice of intent to issue an Emergency Permit to the Department of the Navy Base Realignment and Closure Program Management Office Southeast.

The treatment site will be at the Hanger 860 Munitions Response Area located at the former Naval Air Station Cecil Field, Jacksonville, Florida at latitude: 30°13'12.52"North; longitude: 81°53'43.00"West.

The permit authorizes the detonation and treatment of unstable, reactive, flammable, shock-sensitive or explosive materials.

An emergency permit pursuant to Sections 403.726(5) and 120.59(3), F.S., and Rule 62-730.320, F.A.C., is warranted because there is an imminent and substantial endangerment to human health and the environment. The issuance of this permit will result in environmental benefits as compared with the previous storage conditions of the waste. The permit is drafted in accordance with the provisions of the Resource Conservation and Recovery Act and the Florida Resource Recovery and Management Act, and is designed to protect human health and the environment.

The permit files are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399, or at the NE District Office, 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590.

Persons wishing to comment upon the permit issuance or to the permit conditions are invited to submit same in writing within forty-five (45) days of the date of this notice to the following address: Florida Department of Environmental Protection, ATTN: Environmental Manager, 2600 Blair Stone Road, Mail Stop 4560, Tallahassee, Florida 32399-2400.

The public notice number should be included in the first page of the comment.

All comments received within the 45-day period will be considered in the formulation of future emergency permits.