

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
(904) 396-6959



NAS Jacksonville Administrative Record
Document Index Number

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January 28, 1985

Mr. William Roche
Environmental Engineer
Public Works Department
Naval Air Station
Post Office Box 5
Jacksonville Florida 32212

Dear Mr. Roche:

As per your request of January 22, 1985, enclosed are letters copied from the Department's enforcement files regarding your involvement with Roto-Rooter Sewer Service of Duval County, Inc., and/or the Ettlenger's Pit site.

Please contact me if I can be of further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Janet C. Gray".

Janet C. Gray
Enforcement Section

JCG:ml *MF*

Enclosures

cc: Capt. T. J. Heffernan

OFFICER IN CHARGE OF CONSTRUCTION
P. O. BOX 5
NAVAL AIR STATION
JACKSONVILLE, FLORIDA 32212

2213
STAFFIELD
Dr. Ward
Dr. Conder
File

Code R11

SEP 14 1973

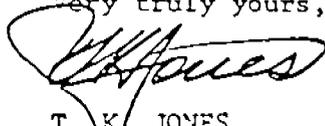
Mr. Albert E. Bertram, P. E.
Public Health Division
Environmental Health Branch
515 West Sixth Street
Jacksonville, Florida 32206

Dear Mr. Bertram:

In response to your letter of 6 September 1973 relative to the waste material being disposed of by Roto Rooter Service, you are advised that this company is a subcontractor performing services for Standard Refuse, Inc. of Jacksonville, Florida. The contractor was required to furnish a certification of an approved disposal area prior to award of the contract. A letter from the Department of Public Works, City of Jacksonville, dated 1 August 1972 to Mr. Homer Humphries of Standard Refuse, Inc. was submitted to this office for compliance with the above contract requirement.

In view of the recent alleged violation of the Waste Disposal Act by the subcontractor, Roto Rooter Service, you are advised that the prime contractor has been notified and he has assured this office that the matter will be corrected immediately. You will be contacted concerning the final resolution in the very near future.

Very truly yours,



T. K. JONES
CDR CEC USN
Officer in Charge of
Construction



DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services Division

September 10, 1973



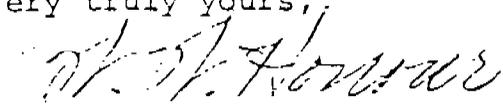
Commander T. K. Jones
CDR, CEC, USN
Public Works Officer
Naval Air Station
Jacksonville, Florida 32212

Dear Commander Jones:

In response to your thoughtful and comprehensive letter of 31 August, 1973, Mr. Al Bertram, P. E., Acting Administrator of our Environmental Services Division, has been asked to contact you. It is obvious that the waste that you have generated being processed by Roto-Rooter is in violation of the Waste Disposal Act you have quoted and the Sanitary Landfill Regulations. Mr. Bertram will contact you shortly concerning resolution of the problems involved.

As always your cooperation is much appreciated.

Very truly yours,


Walter W. Honour
Division Chief

WWH/ns
cc: Mr. A. E. Bertram



DEPARTMENT OF HEALTH AND WELFARE
Public Health Division
(A Unit of the State Division of Health, F. S. 154)

September 6, 1973



Public Health Division
Environmental Health Branch
515 West Sixth Street
Jacksonville, Florida 32206

T. K. Jones
CDR, CEC, USN
Public Works Officer
Naval Air Station
Jacksonville, Florida 32212

Dear Commander Jones:

Reference is made to your letter to Mr. Walter Honour concerning the disposal of certain solid and liquid waste materials from the Naval Air Station. This waste material which includes, "oil, grease, paint stripping and miscellaneous matter" is now being collected at the Naval Air Station and hauled to a disposal pit near Kelly Street, Jacksonville, Florida by Roto Rooter Service operated by Mr. Bernard Ettliger. Roto Rooter Service is apparently disposing of this material as "sub-contractor". Your contract requires that "sanitary landfills or other disposable methods shall be operated in accordance with current and future requirements of the Federal Solid Waste Disposal Act, PL89-272, as amended, or the State law governing solid waste disposal, whichever is more stringent."

The Department of Health, Welfare & Bio-Environmental Services must formally advise that Roto Rooter Service is not disposing of the waste materials from the Naval Air Station in compliance with the Florida Administrative Code, Chapter 10D-12; the Jacksonville City Ordinance Code, Chapter 618; or the "Recommended Guidelines" promulgated by the Federal Solid Waste Disposal Act, PL89-272. Roto Rooter's disposal pit has been and continues to be operated in such a fashion that frequent overflows occur damaging adjacent public and private properties. The materials are obnoxious and odorous producing serious safety hazard and nuisance conditions in the surrounding neighborhood. This discharge also represents a significant source for pollution of both ground and surface waters. Furthermore, Roto Rooter Service has failed to obtain a certificate or permit approved by the City Council in accordance with provisions of Chapter 618. The City Health Division is, therefore, instituting appropriate legal action against Roto Rooter Service.



DEPARTMENT OF HEALTH AND WELFARE
Public Health Division
(A Unit of the State Division of Health, F. S. 154)



Page - 2 -

T. K. Jones
CDR, CEC, USN
September 6, 1973

This office would, therefore, appreciate your advice concerning enforcement of provisions of the NAS contract for disposal of the above waste materials.

Very truly yours,

Albert E. Bertram
Albert E. Bertram, P. E.
Acting Administrator

ENVIRONMENTAL HEALTH BRANCH

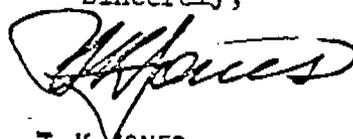
AEB:blt

cc: Mr. J. S. English
Mr. W. W. Honour
Mr. Bert Oatman
Mr. Gerald A. Schneider
P. C. Cowdery, M. D.
Mr. Mickey King
Mr. David Harrell
Mrs. Sallye Mathis
Mr. Joe Carlucci
Mr. Lex Hester

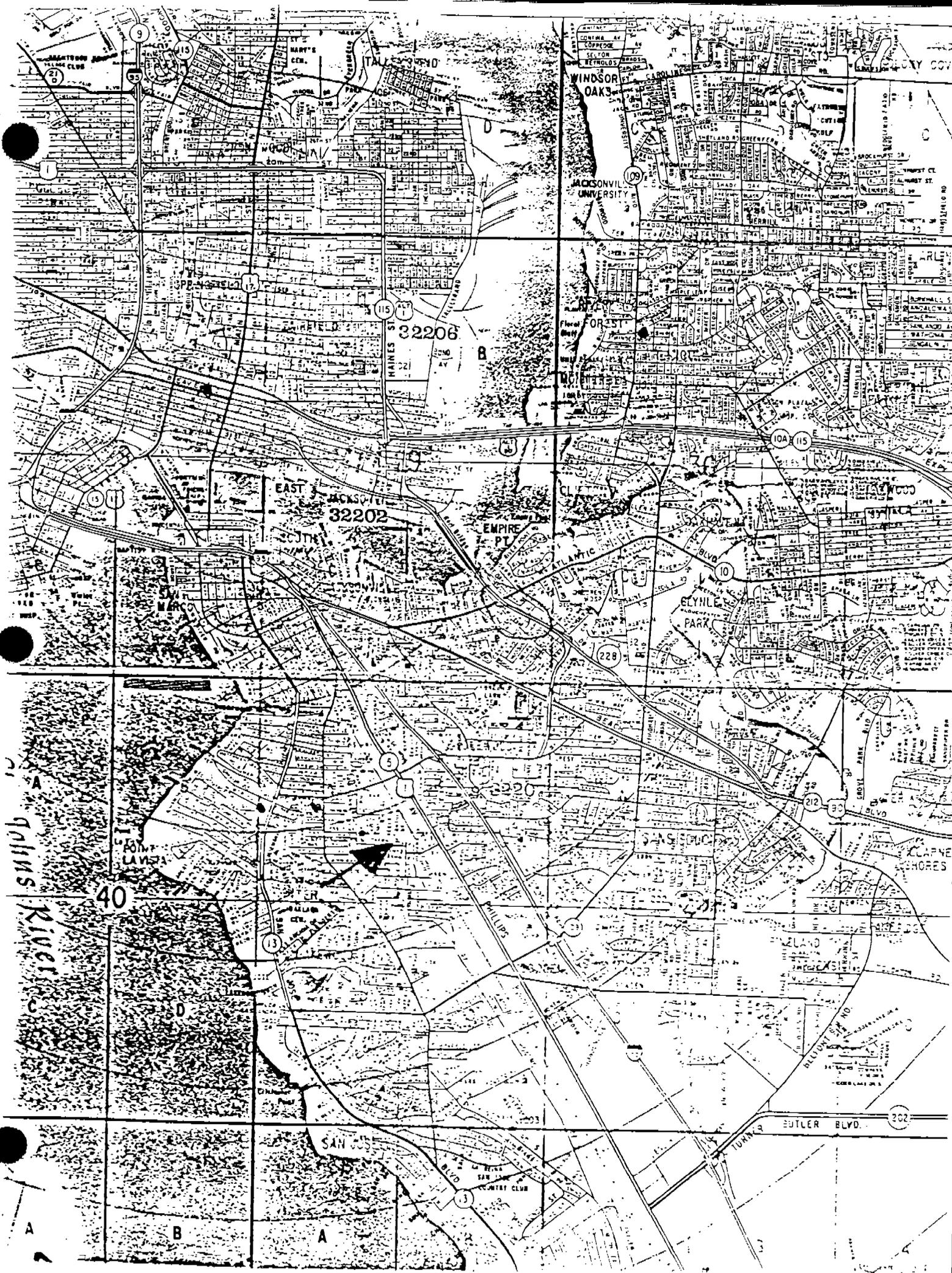


of our plant. I regret I cannot go into greater detail as the items are currently under study for inclusion in the project documentation. Please don't hesitate to contact me if you have further questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. K. Jones".

J. K. JONES
CDR, CEC, USN
Public Works Officer
By direction of the
Commanding Officer



File 11

NAVAL AIR STATION
JACKSONVILLE, FLORIDA 32212

IN REPLY REFER TO:
Code 180

AUG 31 1973



Captain Walter W. Honour, USN RET
Chief, Bio-environmental Services Division
515 West 6th Street
Jacksonville, Florida 32206

Dear Captain Honour:

Some of the information you requested during our 22 August telephone conversation has been rather difficult to dig out, but I trust the delay in my reply has not been any inconvenience to you.

As I mentioned earlier, we contractually dispose of approximately 1500-2000 gallons of skimmings monthly from our new Water Pollution Control Facility. Our contract, however, requires that "sanitary landfills or other disposable methods shall be operated in accordance with current and future requirements of the Federal Solid Waste Disposal Act, PL89-272, as amended, or the State law governing solid waste disposal, whichever is more stringent." The contract further stipulates that "the sanitary landfill shall be operated in accordance with U. S. Department of Health, Education, and Welfare, Public Notice No. 1792, 'Sanitary Landfill Facts', second edition, 1970," in instances where Federal, State, or local standards do not exist.

The nature of the skimmings is semi-solid. They generally include oil, grease, phenols, paint strippings, and miscellaneous matter such as cigarette filters. Should your investigation reveal any violation of the above requirements, please advise; and we will initiate remedial action.

Though the foregoing represents our present situation fairly well, I feel we have made major strides here at NAS, Jacksonville, in the overall effort to improve the environment and control or eliminate pollution of all types...and we are not standing still or becoming complacent with our achievements. For example, we hope to solve the specific problem you brought to my attention with a pollution abatement project submitted on 26 July as our Number 4 priority (at a tentative \$650,000 estimate) for inclusion in the Fiscal Year 1976 Military Construction Program. This project includes several other improvements which will enhance the already good performance