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05 SEP 1991

Mr. James Scarbrough
Chief, RCRA Branch
Waste Management Division
Environmental Protection Agency, Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365

RE: NAS JACKSONVILLE, FLORIDA, HAZARDOUS AND SOLID WASTE AMENDMENT (HSWA)
PERMIT EPA ID NO. FL6170024412

Dear Mr. Scarbrough:

The purpose of this correspondence is to update and clarify several issues regarding the HSWA and Installation Restoration Program sites.

Site 40 in our HSWA permit is incorrectly named. The site name should read Industrial Wastewater Discharge Area vice Municipal Wastewater Discharge Area.

Two units listed in our HSWA permit, Site 41, Municipal Sludge Drying Beds, and Site 42, Polishing Pond for Wastewater Treatment System Effluent, are regulated units under RCRA. These units currently have a closure permit in place and a draft post-closure permit currently in public comment. Because these are regulated units with closure/post-closure permits, they should not be listed as Solid Waste Management Units requiring RFI's in our HSWA permit. Therefore, we request that our HSWA permit be modified to place these units in a special category, not requiring an RFI because of the RCRA closure process. These two units should remain identified in the Federal Facilities Agreement as Potential Source of Contamination (PSC) 41 and PSC 42 respectively

The former Industrial Sludge Drying Beds currently have a draft closure/post-closure permit in public comment. The closure/post-closure permit specifies that the closure be accomplished through the Federal Facilities Agreement. Accordingly, we propose to add this site to the FFA as PSC 43.

On December 14, 1988, NAS Jacksonville notified EPA, Region IV of a potential SWMU, an open channel drain which discharges to the St. John's River at NPDES Discharge Point Source 004 (Permit FL 0000957). Testing of the sediments in the channel have revealed potential metals and organic contamination of the sediments. We propose to add this site to the HSWA permit as Site 44, Drainage Ditch (Point Source 004) from Yorktown Avenue to Mulberry Cove and to the Federal Facilities Agreement as PSC 44.

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PUBLIC WORKS DEPT/Env

SCHROEDER/alm/860

RE: NAS JACKSONVILLE, FLORIDA, HAZARDOUS AND SOLID WASTE AMENDMENT PERMIT
EPA ID NO. FL6170024412

Recently, during repair work to correct plumbing problems at Building 200, a concrete lined pit was discovered. For an unknown period of time the overflow from an oil/water separator flowed into this pit. The oil/water separator served a wash rack where ground support equipment cleaning and paint stripping operations took place. This connection to the concrete pit has been plugged.

The waste from the pit has been removed and is being disposed of as hazardous waste. The concrete pit will be removed and disposed of as hazardous waste. We propose to add this site to our HSWA permit as Site 45, Building 200 Wash Rack Disposal Pit and to the Federal Facilities Agreement as PSC 45.

A table is enclosed which summarizes the changes to the HSWA permit and the FFA site listings.

Please advise as to the proper regulatory placement of the sites addressed.

Our point of contact is Mr. James Schroeder, Hazardous Waste Coordinator, Code 1841, at (904) 772-2717 if you have any questions.

Sincerely,

JOSEPH G. WALLMEYER
Director, Environmental Division
By direction of the Commanding Officer

Enclosure

Copy to:
FDER, NE District, Jacksonville
FDER, Tallahassee

bcc:
—> SOUTHNAVFACENCOM (Codes 1812, 1821)

<u>SITE DESCRIPTION</u>	<u>HSWA SITE NO.</u>	<u>IR PSC NO.</u>	<u>COMMENT</u>
Industrial Wastewater Discharge Area	40	40	Correct HSWA Permit Description to former "Industrial."
Domestic Sludge Drying Beds	N/A	41	Change HSWA permit to reflect special category; RFI not required. Closure/post-closure permit pending.
Polishing Pond	N/A	42	Change HSWA permit to reflect special category; RFI not required. Closure/post-closure permit pending.
Industrial Sludge Drying Beds	N/A	43	Closure/post-closure Permit Pending
Open Channel Drainage between Bldgs 852 and 966, discharging through PS 004	44	44	Discharges to Mulberry Cove through NPDES Point Source 004
Bldg 200 Wash Rack Drainage Pit	45	45	- - - -