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Florida Department of
Environmental Protection



Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7577

Virginia B. Wetherell
Secretary

July 1, 1993

CERTIFIED - RETURN RECEIPT

Commanding Officer
Captain Charles R. Cramer
U.S. Naval Air Station - Jacksonville
Post Office Box 5, Code 1845
Jacksonville, Florida 32212

Dear Captain Cramer:

U.S. Naval Air Station - Jacksonville
Warning Letter No. WL93-0391HW16NED
FL6 170 024 412
HF 16-230808
Duval County - Hazardous Waste

Your application for a hazardous waste closure permit, dated May 6, 1993, has been reviewed and found to be incomplete. The required information to complete your application is itemized in the attached First Notice of Deficiency.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the requested additional information pursuant to Florida Administrative Code (FAC) Rule 17-730.220 and Chapter 403.0876 Florida Statutes (FS).

The deficiencies noted in the attached First Notice of Deficiency may constitute a violation of the Department rules. Failure to correct these deficiencies within thirty (30) days of the receipt of this letter could subject you to formal enforcement action including monetary penalties. If a complete response to each item is not submitted within the time frame given above, the Department will issue a Notice of Violation and begin formal process to deny the permit pursuant to Section 120.60 F.S. Please provide four (4) copies of your completed response to this office.

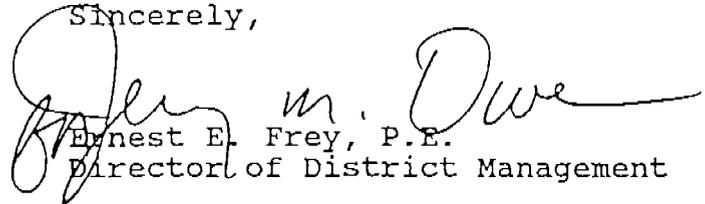
PLEASE BE ADVISED that this Warning Letter is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. The purpose of this letter is to advise you of potential violations and to set up a meeting to discuss possible resolutions to any potential violations that may have occurred for which you may be responsible. If the Department determines that an enforcement proceeding should be initiated in

Commanding Officer
Captain Charles R. Cramer
U.S. Naval Air Station - Jacksonville
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this case, it may be initiated by issuing a Notice of Violation or by filing a judicial action in accordance with Section 403.121, Florida Statutes. If the Department issues a Notice of Violation, and you are named as a party, you will be informed of your rights to contest (request a hearing) any determination made by the Department in the Notice of Violation. The Department can also resolve any violation through voluntary entry into a Consent Order.

You are encouraged to contact this office to discuss the deficiencies noted by the application review. If you have any questions regarding this letter, please contact Stanley Tam of this office at the letterhead address or telephone number (904) 448-4320 ext. 343.

Sincerely,


Ernest E. Frey, P.E.
Director of District Management

EEF
EEF:sts

Attachment

cc: Mr. G. Alan Farmer
Satish Kastury
Kevin Gartland, NAS-Jacksonville
Anderson M. Kinghorn, RUST Environmental & Infrastructure
Eric Nuzie

ATTACHMENT I

U.S. Naval Air Station - Jacksonville
First Notice of Deficiency

Part I

- 1) A-4 page 11 - Date current operation began should be the date when facility began operation of the old electroplating shop and not the expected date of closure. *OK - app. date*
- 2) A-7 page 11 - Provide the complete address. -
A-8 has
- 3) D-1 page 14 - Provide the appropriate SIC codes.
OK
- 4) A-21 page A-2 - Update the list of existing environmental permits. Delete all expired permits. *?*
- 5) B-3 pages B-3 & B-4 - The closure permit application should be a stand alone document and should not reference the operation permit application. Include the referenced figure in the closure permit application. *All included*
- 6) D-2 page C-6, bullet 2 - Provide copies of the manifest(s) to demonstrate that the waste sent to the on-site hazardous waste storage facility has been properly disposed of. In addition, explain how NAS Jacksonville is complying with the requirements of 40 CFR 268.50(c), if the waste is still at the on-site storage facility. *check*
- 7) *OK* page C-7 - The last sentence incorrectly states that Tank 101-3 was managed as a less than 90 days hazardous waste accumulation tank. During the Department's February 11, 1993 inspection, it was determined that the tank was managed as a greater than 90 days hazardous waste storage tank. Correct all references in the permit application to reflect this.
- 8) page C-14, paragraph 2 - Verify that the referenced figure is C-1.
correct

200
24 $\frac{12}{00}$

Part II - A, General

9) A.1.a page D-2 - Provide a topographic map showing a distance of 1000 feet around the hazardous waste management area at a scale of 1" to 200'. Contours must be shown on the map with intervals sufficient to clearly show the pattern of surface water flow in the vicinity of and from each operational unit of the facility (e.g., contour intervals of 5' if relief is greater than 20 feet or an interval of 2' if relief is less than 20 feet). The map should clearly show the following:

1" = 200'
1" = 2400'

- (1) Map scale and date
- (2) Orientation of the map
- (3) Access control
- (4) Injection and withdrawal wells both on-site and off-site
- (5) Building and other structures
- (6) Contours sufficient to show surface water flow
- (7) Loading and unloading areas
- (8) Drainage
- (9) Hazardous waste units including cleanup areas
- (10) Runoff control system

Given map is
1" = 24000'

10) A.3 pages D-6 to D-8, figure D-2 - The maps are semi-legible. Provide legible maps and show Building 101 and Waste Oil Tank 101-3 on them.

State these are copies from the COE

11) A.1.b pages E-2 - Provide the date and a legend for the wind rose.

OK date of Master Plan

12) A.4.b pages H-5 & H-11 - Update the list of emergency coordinators as the emergency coordinator listed is no longer at NAS-Jacksonville.

update - Kevin or I

13) page H-5 - Provide addresses for the listed emergency coordinators.

? but OK

14) page H-6, section 4.0 - This section should include the reporting requirements of 40 CFR 264.56(d)(2). *e*

check

15) page H-7 - The emergency coordinator's telephone number (772-4551) on this page does not correspond to the telephone number (772-2717) listed on pp. H-5 & H-11.

PWC >

16) page H-7 - Florida Department of Environmental Protection (FDEP) Northeast District telephone number is incorrect. The correct number is (904)448-4320. *correct*

17) page H-15 - Procedures for the deployment of emergency equipment resources are not included (see comment 18 below also).

- 18) pages H-15 & H-16 - The location, description, and capability of all emergency equipment available should be included [40 CFR 264.56(e)]. *OK*
- 19) page H-16, paragraph 2 - It is necessary to distribute copies of the contingency plan to outside agencies. Situations may arise in which outside agencies will assist in an emergency at this site. *??*
- 20) A.4.c page I-5, paragraph 3 - The first sentence implies that the wastes exhibit the characteristic of reactivity (D003). According to Attachments C and M, no D003 waste was present (although F-listed cyanide bearing wastes were). Please clarify. *correct - assume pass sulfide/cyanide*
- 21) A.4.e page K-3 - Update the figure to include the new Environmental Director. *OK*
- 22) page K-3 - Include the job title and description of the alternate emergency coordinator (David Ford).
- 23) page K-12, item 4 - The training director's actual credentials must be included. *do*
- 24) page K-12, item 6 - The first sentence states that the HW Division Director is primarily responsible for coordinating response to emergencies. However, the emergency coordinator is listed as the Environmental Director. Please explain the discrepancy.
- 25) page K-12, item 6 - Training for emergency response must also include contingency plan training. *OK*
- 26) page K-13, item 6 - Provide information on the "two other types of emergency response training" referred to in the text. *??*
- 27) A.5 page L-2, paragraph 2 - The text "(i.e., pH,2.0)" should be revised to "(i.e., pH < 2.0)". *change*
- 28) page L-5 - F006 is not listed in Table L-2, but it is listed as one of the waste codes for the six (6) outside tanks (OT-1 to OT-6) in Table C-1. Please explain. *correct*
- 29) A.6 Attachment M - The waste analysis plan should include only generalized waste analysis procedures to address how different waste streams generated during closure will be analyzed for the purposes of determining proper disposal and waste identification. All sampling and analysis related to closure activities should be described in the closure plan, including the number of samples and the criteria used to demonstrate clean closure, and should not be included in this attachment.

Move to closure plan

- 30) page M-2 - The last sentence should be revised to state that all sampling and laboratory analysis will be performed by a laboratory which has a Department approved Comprehensive Quality Assurance Plan.
- 31) page M-4 - Mercury is not an approved analyte for Method 6010. *correct*
- 32) page M-4 - Nickel must be included in the list of parameters since it is a constituent for which there is a Land Disposal Restriction (LDR) concentration standard (F006, F007, F008). *correct*
- 33) page M-5, Table M-2 - One sample from the entire concrete pretreatment structures is not adequate. Revise the plan to address the adequate numbers of samples and include justification for their selection. *Add*
- 34) page M-5, Table M-2 - The table does not address samples from the decontamination equipment, the decontamination area, the tanker trucks used to hold the wastewater, and the sumps that will be used for closure activities. *correct add sampling -*
- 35) A.7 pages N-2 & N-3 - Hazardous waste regulations do not require manifesting for on-site transportation of hazardous waste. However, on the referenced pages it appears that hazardous waste are manifested from NADEP to the permitted hazardous waste storage facility. Please clarify. *correct*

Part II - K, Closure Plan

Building 101:

- 36) Attachment T - Provide copies of manifests to the Department for all hazardous wastes generated from closure activities to show when they were sent off-site for disposal. *? "future tense"?*
- 37) page T-2, paragraph 1 - Revise the last sentence to state that the investigation will be addressed by CERCLA activities which also meets RCRA requirements. All references of remediation or any other activities to be conducted under CERCLA should be revised to state that all such activities will also meet RCRA requirements. *correct*
- 38) page T-3, title - It appears that the reference to 40 CFR 264.112(a)(3) is incorrect. *but not (a)(2) - correct*

- 39) page T-3, paragraph 2 - Tanks OT-1 to OT-6 referenced in the last sentence are not shown on Figure T-2. *show*
- 40) page T-3, paragraph 4 - The listed total hazardous waste (group A) tanks capacity appears to be incorrect as the total capacity of all tanks (group A and group B) is 50,070 gallons. *??*
- 41) page T-4, paragraph 2 - It is stated that tanks OT-1 to OT-6 were last used on June 4, 1978. Please verify this date. *OK*
- 42) page T-4, paragraph 3 - Explain how wastes generated during the asbestos removal process will be managed to assure compliance with hazardous waste regulations. *OK*
- 43) page T-4, paragraph 3 - NAS-Jacksonville must propose to keep records of all spills, including but not limited to information such as tank number, the type and amount of the spill, and corrective actions taken during the tanks removal process. *OK*
- 44) page T-7, paragraph 2 - The second sentence states that before any closure activities begin, the piping will be sealed to ensure that no wastewater is discharged to the treatment facility. Explain how the waste and waste residues in the piping system will be removed prior to sealing the piping. *OK*
- 45) page T-7, paragraph 3 - Explain the term, "CERCLA remediation program", as referenced in the last sentence. Is it different from closure of tank systems under RCRA? Also explain how it will meet RCRA requirements. *OK?*
- 46) page T-8, paragraph 1 - It is unclear whether NAS-Jacksonville is proposing to clean to the concentrations listed in Table T-2B or to Method Detection Limit (MDL). Please clarify (see comment 56 below also). *OK*
- 47) page T-9, paragraph 1 - All disposal of hazardous waste should be in compliance with 40 CFR 260 through 268 and not only with Part 268. *OK*
- 48) page T-9, paragraph 3 - Provide details of the wastewater treatment system to show that it is a totally enclosed system. Demonstrate that no VOCs will be released into the environment. *Show carbon filter system*
- 49) page T-10, paragraph 3 - Explain why wastewater will be stored in the container truck for 90 days, or state the number of days the wastewater will be held in the truck before transporting it to the domestic wastewater treatment plant. *certification ?*

50) page T-12, paragraph 2 - The closure plan only addresses removal of waste from the tanks and removal and decontamination of tanks and associated piping. The plan does not address investigation of soils underneath and surrounding the building. As required by 40 CFR 264.197(b), this facility will be required to be closed as a landfill and provide post closure care unless all contaminated soils are removed and clean closure is demonstrated. *See page ?* *Circle site*

51) pages T-16 to T-18, Table T-2A - In NAS-Jacksonville's submittal, "Old Engine Processing Facility, Building 101, Health Threat Evaluation", dated October 1992, Appendix B stated that 29 tanks in the shop had F004 and F005 waste in them. The revised Appendix B to this document, dated October 28, 1992, and Table T-2A do not list the F004 and F005 codes. Please explain the discrepancy. *??*

52) page T-16 - Verify the waste codes listed for tank 47. *??*

53) page T-16 - Tank 49 is not listed on Table T-2A, but it is listed as a HW (group A) tank on Table T-1. Please explain. *correct*

54) page T-18 - Below floor piping and floor sumps should be decontaminated to show that they are free of all waste constituents which were stored in all hazardous waste tanks. *correct waste codes*

55) page T-18 - Revise the plan to show that final rinsate will be free of TOC and TOX for all tanks, pipings, etc. *??*

56) pages T-19 & T-20 - For each waste code, provide information to justify the listed parameters, and their respective cleanup concentration values.

57) pages T-19 & T-20 - What is the significance of the right column (disposal as HW debris)? There was no mention in the closure plan of disposal as HW debris. *yes there is page -*

58) page T-21 - Verify the values of 1,1,1-trichloroethane and trichloroethylene. *2*

59) page T-22 - Indicate the locations of tanks 91 and 92 on the figure. *correct*

Waste Oil Tank 101-3:

60) Attachment T - Provide copies of manifests to the Department for all hazardous wastes generated from closure activities to show when they were sent off-site for disposal. *to do*

- 61) page T-3, paragraph 4 - All sampling and analysis must be in accordance with SW 846, 3rd edition. *Correct*
- 62) page T-3, paragraph 4 - Verify that Southeastern Environmental Laboratories or any laboratory NAS-Jacksonville wishes to use for closure activities has a Department approved Comprehensive Quality Assurance Plan that includes all required analytical parameters and procedures. *Yes*
- 63) page T-4, paragraph 2 - Last sentence should refer to 40 CFR 260-268 instead of 260-265. *Yes*
- 64) page T-4, paragraph 4 - Explain how the waste shipped to the NAS-Jacksonville hazardous waste storage facility (building 144) complies with 40 CFR 268.50(c) requirements which allows waste to be stored for up to one year. *2. in*
- 65) page T-5, paragraph 3 - Analytical methods are not listed in the referenced Table 2-1. *correct*
- 66) page T-6, paragraph 1 - The secondary containment must be inspected before and after the decontamination for visual cracks. If cracks are discovered then soil samples must be taken from underneath the concrete to demonstrate clean closure. If clean closure cannot be accomplished, then the tank will be required to close as a landfill as required by 40 CFR 264.197(b). *to state*
- 67) page T-6, paragraph 1 - Revise the closure plan to include soil sampling from near the outfall of the stormwater discharge pipe. *see pg*

*Add post closure
statement
for all
CERCLA
waste*

General

- 68) This Notice of Deficiency includes only comments on the closure permit application and does not include comments on the final work plan NAS-Jacksonville submitted on June 16, 1993.