

-----Original Message-----

**From:** Santos, Gene (Efdsouth) [SMTP:SantosEW@EFDSOUTH.NAVFAC.NAVY.mil]  
**Sent:** Wednesday, January 16, 2002 9:37 AM  
**To:** Morrison, Elaine (Efdsouth); Peterson, Mark  
**Subject:** FW: RCRA/CERCLA Clarification Letter

-----Original Message-----

**From:** Caspary, Jorge [<mailto:Jorge.Caspary@dep.state.fl.us>]  
**Sent:** Wednesday, January 16, 2002 9:20 AM  
**To:** Tim Curtin (E-mail); Gaskins, Dana (Efdsouth); Robinson, Anthony (Efdsouth); Santos, Gene (Efdsouth)  
**Subject:** RCRA/CERCLA Clarification Letter



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## Florida Department of Environmental Protection

**OFFICIAL CORRESPONDENCE** - This electronic message is sent in lieu of regular mail

To: Gene Santos RCRA SDIV, Tim Curtin NAS Jax, Dana Gaskins, Anthony Robinsons, and Jane Beason

Facility: NAS Jacksonville

Date: January 16, 2002

From: Jorge R. Caspary, P.G.

Site or Document: RCRA Permit

Document Date: Permit Issued November 26, 2001

Receipt Date of Document: Received in Technical Review Section on November 27, 2001

Dear Mr. Santos:

The purpose of this letter is to clarify some of the questions you and Mrs. Jane Beason of NAS Jacksonville had posed on your e-mail dated January 14, 2002.

With regards to conditions 14 and 15 of the Permit, it is my understanding that the sludge drying beds and the polishing pond have had Appendix IX sampling performed in past years. Since no constituents other than those listed on the table shown in Condition 12 have been detected, there is no need to sample for the full suite of Appendix IX

parameters and sampling should be limited to the constituents shown in the referenced table. In addition, this determination is also based on the fact that both units have been sampled for the full suite of TAL/TCL parameters as part of the CERCLA Remedial Investigation with detections being limited to the constituents shown in the table referenced earlier.

With regards to the compliance with HSWA Conditions requiring the preparation of work plans, Confirmatory Sampling documents, etc., I call your attention to Page 25 of 71 Paragraph 1 in which a clear determination is made that the CERCLA Program will integrate the RCRA requirements. To this effect, the RCRA HSWA requirements of delivering work plans, CS documents, RFI documents, etc., have been complied with by virtue of the Navy delivering documents under the CERCLA Program. These are known as RIs, FS, and Work Plans and are equivalent to RCRA documents. As far as compliance with deadlines stipulated in the Permit, I call your attention to Page 34 of 71, Part VII, Condition 3. Compliance with set deliverable timeframes under the RCRA HSWA Permit is not required, as long as these are clearly addressed in the CERCLA Site Management (SMP) plan and updated by the Navy on a timely basis. Any requests for extensions of time under the CERCLA SMP will have to be notified, in writing, to the Department.

With regards to your questions on Appendix B requirements, please refer to Page 43 of 71, first paragraph, in which compliance with the RCRA conditions stipulated under this Appendix will be performed under the CERCLA Program. I believe all the requirements in this appendix have, and will continue to be complied with, under the CERCLA Program in any of their deliverables: RIs, FSs, Lab Data Packages, Work Plans, etc.

Finally, I wish to reiterate that an update of the Appendices (pages 38 to 42 of the permit) is necessary at some point in the next year or two. To accomplish this, close coordination between the Station and SDIV RCRA is recommended. Updating the RCRA HSWA Corrective Action Permit can be accomplished once the Remedies for PSC 51, PSC 47, PSC 46, and Hangar 1000 are chosen. Note, in order to comply with RCRA ARARS and statutory requirements, the HSWA permit will have to be modified to update the status of the above SWMUs. However, management of the selected remedies and their implementation will be done under CERCLA.

If you have any questions, please contact me at (850) 921-9986.



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