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NAS JACKSONVILLE
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LETTER REGARDING U S NAVY RESPONSES TO FIRST NOTICE OF DEFICIENCY FOR
CLOSURE PERMIT AT OLD PLATING SHOP NAS JACKSONVILLE FL
7/30/1993
NAS JACKSONVILLE



DEPARTMENT OF THE NAVY

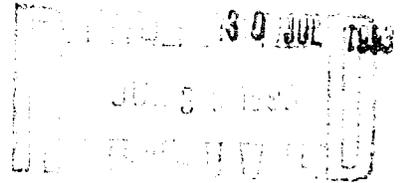
NAVAL AIR STATION
JACKSONVILLE, FLORIDA 32212-5000

IN REPLY REFER TO

5090

Code 184WR

NORTHWEST DISTRICT



DEP-JACKSONVILLE

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Mr. Stanley Tam
Northwest District
Florida Department of Environmental Protection
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7577

Re: Response to the First Notice of Deficiency for NAS Jacksonville Old
Plating Shop - Building 101 and Waste Oil Tank 101-3 Closure Permit

Dear Mr. Tam:

In response to Warning Letter Number WL93-0391HW16NED of July 1, 1993, we
have addressed your review comments below and have enclosed the requested
changes to the permit application.

Completely revised Attachments H, K, M, and T are included with the
responses to FDEP's July 1, 1993 comments, and are noted "REV.1, JUL 30
93." For clarity, all references to page numbers and paragraphs in our
responses to FDEP comments are referenced to the original Attachments dated
June 1, 1993.

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.

Response: Operation of the old Electroplating Shop began in the
early 1940's. The application section was revised and is enclosed.

- (2) A-7 page 11 - Provide the complete address.

Response: The address has been corrected and a revised application
page 11 is enclosed.

- (3) D-1 page 14 - Provide the appropriate SIC codes.

Response: The appropriate SIC code is 9711. Please manually add
this SIC code to your copies of page 14, Section D, item #1.

- (4) A-21 page A-2 - Update the list of existing environmental
permits. Delete all expired permits.

Response: The permits listing has been updated and all expired
permits have been deleted. The revised pages A-2 and A-3 are
enclosed.

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(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.

Response: The referenced figure B-1 and page B-4 have been revised and are enclosed.

(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.

Response: The manifests are enclosed. The HWSF meets 268.50(c) in that waste is typically transported for disposal within 90 days of being received at the facility.

(7) page C-7 - The last sentence incorrectly states that Tank 101-3 was managed as a less-than-90-day 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-day hazardous waste storage tank. Correct all references in the permit application to reflect this.

Response: References to Tank 101-3 have been corrected and are enclosed.

(8) pages C-14, paragraph 2 - Verify that the referenced figure is C-1.

Response: The referenced figure should be C-3. The application page C-14 has been corrected and is enclosed.

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 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) 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

Response: The map has been prepared as a new Figure D-2 and is enclosed.

(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.

Response: Building 101 and Waste Oil Tank 101-3 are not shown on old Figure D-2. The Figure D-2 maps were prepared for the first permit application submittal in 1987 by the Jacksonville Corps of Engineers for the HWSFs. Consequently, we do not have the original maps to revise. Figure D-1 indicates that the Plating Shop and waste oil tank were not located in areas subject to flooding from the 100-year nor 500-year FEMA defined flood events. Old Figure D-2 has been replaced with a topographical map of the HW management area.

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

Response: A date and legend for the wind rose have been added and

are enclosed.

(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.

Response: The list of emergency coordinators has been updated and is enclosed.

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

Response: The addresses have been added and are enclosed.

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

Response: The reporting requirements have been added and are enclosed.

(15) page H-7 - The emergency coordinator's telephone number (772-4551) on this page does not correspond to the telephone number (722-2717) listed on pp. H-5 & H-11.

Response: The emergency coordinator's telephone number has been corrected and is enclosed.

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

Response: The FDEP Northeast District telephone number has been corrected, verified and is enclosed.

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

Response: Procedures for deployment of emergency equipment resources have been included and are enclosed.

(18) pages H-15 & H-16 - The location, description, and capability of all emergency equipment available should be included [40 CFR 264.56(e)].

Response: The locations, description, and capability of all emergency equipment available has been included and are enclosed.

(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.

Response: Copies of the final contingency plan will be distributed

to outside agencies after the permit is approved. Cover letters will follow which indicate the agencies to which copies of the plan from this document were sent.

(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.

Response: Page I-5 has been revised and is enclosed.

(21) A.4.e page K-3 - Update the figure to include the new Environmental Director.

Response: The figure has been updated to include the new Environmental Director and is enclosed.

(22) page K-3 - Include the job title and description of the alternate emergency coordinator (David Ford).

Response: The job title and description of the alternative emergency coordinator has been added and is enclosed.

(23) page K-12, item 4 - The training director's actual credentials must be included.

Response: The training director's credentials have been added and are enclosed.

(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.

Response: The Environmental Director is primarily responsible for coordinating response to emergencies for the base. The Hazardous Waste Division Director is responsible for coordinating responses to Hazardous Waste Storage Facility emergencies. These responsibilities have been updated and are enclosed.

(25) page K-12, item 6 - Training for emergency response must also include contingency plan training.

Response: Training for emergency response also includes contingency plan training. Page K-12 has been revised and the updated page is enclosed.

(26) page K-13, item 6 - Provide information on the "two other types of emergency response training" referred to in the text.

Response: This sentence has been deleted. The revised page is enclosed.

(27) A.5 4 page L-2, paragraph 2 - The text (i.e., pH, 2.0)" should be revised to "(i.e., pH <2.0)".

Response: The text has been revised to show pH ≤2.0 as per 261.22(a)(1), and is enclosed.

(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.

Response: The waste code F006 has been added to Table L-2 on Page L-5. The corrected page is enclosed.

(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 criteria used to demonstrate clean closure, and should not be included in this attachment.

Response: All sampling and analysis related to closure activities has moved to the Closure Plan. The revised Attachment M and Closure Plan are enclosed.

(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.

Response: The last sentence on page M-2 has been revised and is enclosed.

(31) page M-4 - Mercury is not approved analyte for Method 6010.

Response: This reference has been revised and is enclosed.

(32) page M-4 - Nickel must be included in the list parameters since it is a constituent for which there is a Land Disposal Restriction (LDR) concentration standard (F006, F007, F008).

Response: Nickel has been included in the list of parameters and is enclosed.

(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.

Response: A revised sampling scheme is enclosed.

(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.

Response: Samples from decontamination equipment, decontamination station, tanker trucks, and sumps have been added.

(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.

Response: The referenced pages have been corrected and are enclosed.

Part II - K, Closure Plan

(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.

Response: Copies of manifests will be provided by the Navy for all wastes generated from closure activities.

(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 will also meet RCRA requirements.

Response: The paragraph has been revised to include the following statement and is enclosed: The RCRA Closure at Building 101 is described in this Closure Plan. All other remediation work required by the Installation Restoration Program will be addressed under the CERCLA Remediation Program for which RCRA will be an ARAR.

(38) page T-3, title - It appears that the reference to 40 CFR 264.112(a)(3) is incorrect.

Response: The reference should have been 40 CFR 264.112(b)(2) and (3). The corrected page is enclosed.

(39) page T-3, paragraph 2 - Tanks OT-1 to OT-6 referenced in the last sentence are not shown on Figure T-2.

Response: Figure T-2 has been revised and is enclosed.

(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.

Response: The total capacity of the HW tanks should be approximately 38,000 gallons. The revised page is enclosed.

(41) page T-4, paragraph 2 - It is stated that tanks OT-1 to OT-6 were last used in June 4, 1978. Please verify this date.

Response: The date has been verified. The Industrial Wastewater Treatment Plant was constructed on or about this date such that use of these tanks would have been discontinued when the IWTP was started up.

(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.

Response: The wastes generated during the asbestos removal process will be managed as hazardous wastes as presented in the work plan. The wastes will be stored in a 30 cubic yard covered roll-off dumpster which will be appropriately labeled as Hazardous Waste. This will be managed as a less-than-90-day HW accumulation area.

(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.

Response: Page T-4 has been revised to add record keeping and is enclosed.

(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.

Response: Page T-7 has been revised and is enclosed.

(45) page T-7, paragraph 3 - Explain the term, "CERCLA remediation program", as referenced in the last sentence. Is it different from closure of tanks systems under RCRA? Also explain how it will meet RCRA requirements.

Response: The paragraph has been revised to include the following statement and is enclosed: The RCRA Closure at Building 101 is described in this Closure Plan. All other remediation work required by the Installation Restoration Program will be addressed under the CERCLA Remediation Program for which RCRA will be an ARAR.

(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).

Response: Table T-2B has been revised and is enclosed.

(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.

Response: Page T-9 has been revised and is enclosed.

(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.

Response: Details are enclosed for the wastewater treatment 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.

Response: The waste water will be held until such time that it can be verified that it is meeting NPDES requirements (Table T-3). The holding time will be determined by waiting until a sufficient quantity is generated to warrant transport plus analytical time.

(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.

Response: The paragraph has been revised to include the following statement and is enclosed: The RCRA Closure at Building 101 is described in this Closure Plan. All other remediation work required by the Installation Restoration Program will be addressed under the CERCLA Remediation Program for which RCRA will be an ARAR.

(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.

Response: The October 1992, Appendix B was a draft copy and the tank waste codes, F004 and F005, were incorrectly reported due to an error in interpretation by the preparer. After review of the draft Appendix B by NAS JAX personnel, the revised Appendix B was prepared.

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

Response: The waste codes for tank 47 have been revised and are enclosed.

(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.

Response: No samples were taken in this tank, therefore no analytical results are available. But, through user knowledge and visual inspection of the photographs, this tank is classified as hazardous. Table T-2A has been revised to add Tank 49 and is enclosed.

(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.

Response: Table T-2B has been revised to add all waste codes for below floor piping and floor sumps and is enclosed.

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

Response: Table T-2B has been revised to include TOC and TOX.

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

Response: Table T-2B has been revised and is enclosed. The parameters for each waste code are based on the regulated hazardous constituents listed in 40 CFR 268 Subpart D, Tables CCWE and CCW. TOC and TOX have been added in response to comment number 55. The concentration values are justified in the table notes.

(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.

Response: Table T-2B has been revised and the right column deleted.

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

Response: The values were obtained from NPDES Permit FL0000957, Outfall 001 (Sanitary WWTP/Final Effluent) and are believed to be correct as written.

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

Response: Tanks 91 and 92 were located in the West Room, but they have been moved to the new plating shop at the southern corner of NADEP. Therefore, they are not shown on Figure T-1. The tanks contained wax and did not contain hazardous materials.

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.

Response: Manifests will be provided within 60 days of completion of the project. Enclosed is copy of the hazardous waste manifest for the 2,370 gallons removed from the tank on 6 February 1992. The manifest number for the waste disposed is 92284 dated March 2, 1992.

(61) page T-3, paragraph 4 - All sampling and analysis must be in accordance with SW 846, 3rd edition.

Response: All sampling and analysis will be performed in accordance with SW-846 (latest or 3rd Edition). Page T-3 has been revised and is enclosed.

(62) page T-3, paragraph - 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.

Response: The laboratory to be used is Southeastern Environmental Laboratories, Inc. The date of approval by the Department of Environmental Regulation QA Officer is 11-19-92. Page T-3 has been revised and is enclosed.

(63) page T-4, paragraph - Last sentence should refer to 40 CFR 260-268 instead of 260-265.

Response: The spilled materials will be managed in accordance with 40 CFR 260-268. Page T-4 has been revised and is enclosed.

(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.

Response: The hazardous waste storage facility meets 40 CFR 268.50(c) requirements in that waste generated is, in most cases, disposed within 90 days of the waste being stored in the Hazardous Waste Facility. Page T-4 has been revised and is enclosed.

(65) page T-5, paragraph 3 - Analytical methods are not listed in the referenced Table 2-1.

Response: All sampling and analysis will be performed in accordance with SW-846 (latest or 3rd Edition). Page T-5 has been revised and is enclosed.