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NAS JACKSONVILLE
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LETTER REGARDING REGULATORY REVIEW AND ADDITIONAL COMMENTS ON FIRST
NOTICE OF DEFICIENCY FOR CLOSURE PERMT AT OLD PLATING SHOP NAS
JACKSONVILLE FL
8/8/1993
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

0047-7559

Florida Department of Environmental Protection



Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

8 KHK
August 11, 1993

~~ADAM ERDOSTER~~
~~ASST. DIR. PATEL, PDE~~
~~CHIEF~~

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. WL93-0413HW16NED
FL6 170 024 412
HF 16-230808
Duval County - Hazardous Waste

The Department has completed the review of your July 30, 1993, response to the Department's First Notice of Deficiency letter. With this additional information, you have provided most of the information needed to complete the permit application. However, the following items need further correction:

1. pages 11 and 12 - Items A-2, A-3, A-14, and A-18 must be completed.
2. page L-5 - For the F006 code, the text under the "Treatment Methods" column appears to be incorrect. It should be the same as for the F007 and F008 codes on the next page.
3. page N-3 - Manifest must also include information required by 17-730.160(4) F.A.C.
4. Page N-28 - The manifest stated that 20,016 pounds of contaminated waste oil were disposed of. However, on Table C-1, it was stated that 15,836 pounds were disposed of. Please explain the discrepancy.
5. part I, pages T-2, T-3, T-8, and T-20 - Your response to the Department's comments #37, #50, and #66 needs clarification.

Administration 448-4300
Air 448-4310
Waste Management 448-4320



Water Facilities 448-4330
Water Management 448-4340
FAX 448-4366

Commanding Officer
Captain Charles R. Cramer
U.S. Naval Air Station - Jacksonville
Page Two

It is not clearly stated when RCRA and/or CERCLA will be complied with. These and other similar references should be revised to state that all closure activities will be conducted under the CERCLA remediation program for which RCRA will be an ARAR.

6. part I, page T-15 - In addition to the outside tanks (OT-1 to OT-6), specify the number of samples that will be taken from the decontamination of the floor of Building 101, and include justification for their selection.
7. part II, page T-2 - In the last sentence, the manifest number appears to be incorrect.
8. part II, page T-5, item 5 - The text references Table 2-1 for sampling and analytical methods. Table 2-1, in turn references Attachment M. However, in Attachment M, the analytical methods discussed do not include F002 constituents (page M-7), and references Attachment T for site specific sampling methods (page M-6). Analytical method(s) should be included for F002 constituents. In addition, sampling methods for tank 101-3 must be included in the closure plan.
9. part II, page T-6, item 6 - Regardless of whether clean closure for the secondary containment is achieved, soil sample(s) from near the outfall of the stormwater discharge pipe must be collected for analysis. Similarly, regardless of the clean closure status of the secondary containment, soil samples from underneath the concrete must be collected for analysis if there are any visual cracks or gaps in the concrete floor.
10. workplan, page 10 - The sampling scheme needs to be updated.
11. Please correct all references of FDER to FDEP, ie. page N-5.

Your complete response to this letter should include four (4) copies of the revised permit application which addresses the above comments and the revised pages of your July 30, 1993, submittal.

When a permit application is incomplete, all processing of the application is suspended. Pursuant to Rule 17-730.220 F.A.C. and Chapter 403.0876 FS, you are hereby advised to provide us with the above requested information within thirty (30) days of the receipt of this letter.

Commanding Officer
Captain Charles R. Cramer
U.S. Naval Air Station - Jacksonville
Page Two

If you have any questions regarding this letter, please contact me
at the letterhead address or call (904) 448-4320, extension 343.

Sincerely,

Stanley Tam

Stanley Tam
Hazardous Waste Engineer

ST
ST:lm

cc: Satish Kastury
Kevin Gartland