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06 OCT 1987

Mr. John Ruddell
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301

Subj: NAVAL AIR STATION, ██████████ SITE NO. 26, OLD MAIN REGISTERED
DISPOSAL AREA

Dear Mr. Ruddell:

The subject site, also known as the Solvent and Oil Disposal Area, is a contaminated area on NAS Jacksonville which has been the subject of several contamination investigations and one remedial cleanup project. After several delays, the Navy is in the process of developing a remedial design for this site. The current proposal is to collect the contaminated groundwater from the site, strain off all floating contaminants and allow any sediment to settle out, and then pump the residual wastewater to NAS Jacksonville's wastewater treatment plant.

We had a meeting on February 5, 1985 at NAS Jacksonville to discuss this approach with FDER and EPA IV. The agreement reached during the meeting was that the discharge was not a hazardous waste as it did not meet the characteristics of a hazardous waste. Accordingly, the discharge of the groundwater to the wastewater treatment plant would not make the facility subject to hazardous waste regulations. Also at the meeting the potential for the collection pond to seep and cause additional contamination was discussed. One idea proposed was lining the pond. We do not believe this is necessary as we will maintain a pond water level such that the groundwater gradient is to the pond. This will be confirmed with piezometers to be installed as part of the project. Also, since the contaminated groundwater is not a hazardous waste, the pond is not a hazardous waste surface impoundment and does not require a double liner.

During the time frame since our meeting, many aspects of RCRA and CERCLA have changed. Prior to starting a design of the remediation method previously proposed, we would like you to reaffirm FDER's agreement with the contaminated groundwater not being a hazardous waste and not being subject to RCRA or subjecting our wastewater treatment plant to RCRA. To help in your decision we have attached a copy of the handout with data on the groundwater which we presented at the February 5, 1985 meeting.

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Subj: NAVAL AIR STATION, JACKSONVILLE: SITE NO. 26, OLD MAIN REGISTERED
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We will proceed with parts of the design not impacted by the hazardous waste issue while we await your response. If additional information is needed or your response is RCRA does apply, please call Mr. Mike Green as soon as possible at telephone number (803) 743-0574.

Sincerely,

A. R. SPELLE, P.E.

Head, Environmental Branch

Encl:

(1) Remedial Action Plan

Copy to: (w/o encl)

NAS Jacksonville (Attn: Bill Roche)