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LETTER OF TRANSMITTAL FOR U S EPA NOTIFICATION PACKAGES FOR THE
PROPOSED MODIFICATION OF THE HAZARDOUS AND SOLID WASTE AMENDMENTS
PERMIT WITH ATTACHMENTS NAS KEY WEST FL
7/7/1998
TETRA TECH NUS



TETRA TECH NUS, INC.
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7046-7.16.2
Q A Record

AIK-98-0316

0011

July 7, 1998

Project Number HK 7046

Federal Express

Mr. Phillip Williams
 Environmental Protection Specialist
 Environmental Branch
 Building A629
 Naval Air Station
 Key West, Florida 33040

Reference: CLEAN Contract No. N62467-94-D-0888
 Contract Task Order No. 007

Subject: Notification Packages for the Proposed Modification of the Hazardous and Solid Waste
 Amendments Permit

Dear Mr. Williams:

Tetra Tech NUS, Inc. is pleased to enclose the U. S. Environmental Protection Agency Notification Packages for the proposed Modification of the Hazardous and Solid Waste Amendments Permit at NAS Key West. The packages contain the Public Notice of the proposed permit modifications; Statement of Basis documents for SWMUs 1, 2, 3, and 4; and the draft permit modification language. As requested, we have sealed and labeled the packages and they are ready for you to mail out to the mailing list recipients. This package was prepared as a team effort among the members of the NAS Key West Partnering Team.

Please call me at (803) 649-7963, ext. 345 should you have any questions about the enclosed packages.

Sincerely,

C. M. Bryan
 Task Order Manager

CMB/dsp

Enclosure

c: Ms. D. Evans-Ripley, SouthDiv (w/o enclosures)
 Mr. D. Patrick, SouthDiv
 Mr. R. Demes, NAS Key West
 Mr. M. Perry, B&R Environmental

Ms. M. Berry, U. S. EPA, Region IV
 Mr. J. Caspary, FDEP
 Mr. R. Hoekstra, Bechtel Environmental Inc.
 File 7046-7.8, 7.9, 7.15, 7.16

See file 7046-7.8



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303-8909

South Florida Keys Residents
Naval Air Station Key West
Mailing List Recipient

Subj: Proposed Modification of the HSWA Permit

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) is requesting that the public comment upon a proposed permit modification of the Hazardous and Solid Waste Amendments (HSWA) permit for the Naval Air Station (NAS) Key West. Enclosed for your information are copies of the following documents:

- (1) Public Notice of the proposed permit modifications;
- (2) Statements of Basis for Solid Waste Management Units (SWMUs) 1, 2, 3 and 4;
- (3) Draft permit modification language.

Information concerning the public comment period and the public meeting that will be held on July 27, 1998 is found in the public notice. If you have any questions, please contact either Phillip Williams, NAS Key West, at (305) 293-2061 or me at (404) 562-8533.

Sincerely,

A handwritten signature in cursive script that reads "Martha Berry".

Martha Berry
Remedial Project Manager
Federal Facilities Branch

Enclosures

PUBLIC NOTICE
U.S. Environmental Protection Agency
Region 4
Waste Management Division
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

NOTICE OF INTENT TO MODIFY THE HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) PERMIT UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA), AS AMENDED BY THE HAZARDOUS AND SOLID WASTE AMENDMENTS OF 1984.

The Environmental Protection Agency requests public comment upon a draft permit modification for the HSWA portion of a RCRA permit issued to Naval Air Station Key West for its facility on Boca Chica Key, Florida. This permit modification is issued to address the investigation of solid waste management units for releases of hazardous waste and/or hazardous constituents as required under Section 3004(u) and 3004(v) of RCRA, as amended. This permit modification would expand the permit's conditions to allow for the incorporation of the proposed remedy for the solid waste management units.

The State of Florida Department of Environmental Protection has issued an operating permit on June 1994, to the facility under authority of the Hazardous Waste Management Act of 1975, Act 129, Second Special Session 1978, amended. The federal HSWA permit, which was issued on July 31, 1990, combined with the State permit, constitutes a full RCRA permit for this facility. Since the State of Florida has yet to be authorized to implement all of the 1984 Amendments, EPA is imposing those applicable HSWA provisions at Naval Air Station Key West which the State of Florida has yet to receive authorization to implement.

The Naval Air Station Key West on Boca Chica Key, Florida (Environmental Protection Agency I.D. Number FL6 170 022 952) is engaged in providing services and managerial support for the operation and maintenance of aircraft and naval weapons to activities and units of the operating forces as designated by the Chief of Naval Operations. The Key West Naval Air Station is located on Boca Chica Key, Florida.

The modification of the HSWA permit will provide EPA with the authority to require necessary corrective action at identified SWMUs and AOCs. Specifically, the draft HSWA permit modification for Naval Air Station Key West requires the Permittee to implement the selected corrective action for SWMUs 1, 2, 3 and 4. In addition, the draft permit modification adds definitions for the following: 1) Land Use Controls; 2) Land Use Control Assurance Plan; 3) Land Use Control Implementation Plan; and 4) Corrective Action Management Plan. Proposed Section II.L is added to explain the purpose of the Memorandum of Agreement (MOA). The purpose of the MOA is to establish a written installation-wide plan that sets out the procedures to assure land use controls remain effective over the long-term for all areas at NAS Key West where they are required as a part of the corrective action. Lastly, SWMU 9, the Jet Engine Test Cell, is proposed to be added to Appendix A.I of the permit.

The administrative record, which included the material listed above as well as all other information submitted by the applicant, is available at the U.S. Environmental Protection Agency at the above address during the hours listed.

Persons wishing to comment upon the proposed permit modification should submit comments to EPA in writing. All comments will be considered when the final decision to issue the permit modification is made. All comments should be sent to:

Martha Berry
Waste Management Division
U.S. Environmental Protection Agency
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-8533
berry.martha@epamail.epa.gov

The following definitions will be added to the permit. The definitions shall be inserted after permit condition I.G.10

I.G.11 A Land Use Control (LUC) is defined as any restriction or control, arising from the need to protect human health and the environment, that limits the use of and/or exposure to any portion of that property, including water resources.

I.G.12 The Land Use Control Assurance Plan (LUCAP), is a written installation wide plan that sets out the procedures to assure LUCs remain effective over the long-term for all areas at a particular installation where they are required. For the purposes of this permit, the LUCAP will consist of the MOA mentioned in Section II.L.

I.G.13 The Land Use Control Implementation Plan (LUCIP) refers to a written plan which:
1) identifies each LUC objective for that area; and 2) specifies those actions required to achieve each identified objective. LUCIPs specify what must be done to impose and maintain the required LUCs. The LUCIP is appended to the MOA specified in II.L of this permit.

I.G.14 The Corrective Action Management Plan (CAMP) for the purposes of this permit is an enforceable schedule of compliance approved by the Regional Administrator for the submittal of work plans and reports which include, at a minimum, Additional Information, Confirmatory Sampling, RCRA Facility Investigation, Corrective Measures Study and any work plans and reports required as a part of Corrective Measures Implementation.

The purpose of this modification is to update the EPA address and to add FDEP as a party to receive reports required under this permit. Permit Condition II.K.5 is modified as follows:

II.K.5 Two (2) copies . . . following address:

Federal Facilities Branch/ Waste Management Division
U. S. Environment Protection Agency/ Region 4
61 Forsyth Street
Atlanta, Georgia 30303

The copies should be addressed to the current Federal Facilities Remedial Project Manager for NAS Key West.

Two (2) additional copies should be sent to the current FDEP Project Manager at the following address:

Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

II.M.3 The recommended corrective action for SWMU 3, as described in II.M.2, is dependent on the assumption that the reasonably assumed future use of SWMU 3 will remain industrial. LUCs should be established to prevent residential use exposure to surface water, sediment and groundwater. A LUCIP, as defined in I.G.13 should be developed to address these LUCs. The schedule for developing the LUCIP will be specified in the MOA.

Modification II.N is for the selection of the corrective action that will be implemented for SWMU 4.

II.N Corrective Measures Implementation for SWMU 4

II.N.1 For SWMU 4, the Boca Chica Aircraft Intermediate Maintenance Building (AIMD) A-980, the Permittee shall implement the action recommended in the RFI, dated January 1998 and approved February 5, 1998, and concurred with by EPA as set forth in the Statement of Basis/Final Decision and Response to Comments Summary, attached hereto as Appendix G and as outlined in Permit Conditions II.N.2 and II.N.3

II.N.2 The recommended action for SWMU 4 is No Action with Land Use Controls. The previous source and soil removal activities eliminated the need to perform additional corrective action. The main contaminants at SWMU 4 are organics, metals and pesticides. The BRA identified one carcinogenic risk exceeding the 1E-6 cancer thresholds: for the hypothetical future resident, it is 1E-6. The noncarcinogenic risk for the future resident slightly exceeds 1.0.

II.N.3 The recommended corrective action for SWMU 4, as described in II.N.2, is dependent on the assumption that the reasonably assumed future use of SWMU 4 will remain industrial. LUCs should be established to prevent residential use exposure to surface water, surface soil, sediment and groundwater. A LUCIP, as defined in I.G.13 should be developed to address these LUCs. The schedule for developing the LUCIP will be specified in the MOA.

Modification II.O is for the selection of the corrective action that will be implemented for SWMU 1.

II.O Corrective Measures Implementation for SWMU 1

II.O.1 For SWMU 1, the Former Boca Chica Open Disposal Area, the Permittee shall implement the action recommended in the CMS, dated March 1998 and approved May 6, 1998, and concurred with by EPA as set forth in the Statement of Basis/Final Decision and Response to Comments Summary, attached hereto as Appendix H and as outlined in Permit Conditions II.O.2 and II.O.3

II.O.7 Should the corrective action effectiveness reports and/or the Five Year Review Reports indicate that the selected corrective action is not effective in protecting human health and the environment, the Permittee must submit a CMS Report to recommend an alternative remedy, as outlined in Section II.G, in accordance with the CAMP or no later than ninety (90) days of notification by the Regional Administrator that the remedy is no longer protective.

Modification II.P is for the selection of the corrective action that will be implemented for SWMU 2.

II.P Corrective Measures Implementation for SWMU 2

II.P.1 For SWMU 2, the Former Boca Chica DDT Mixing Area, the Permittee shall implement the action recommended in the CMS, dated March 1998 and approved May 6, 1998, and concurred with by EPA as set forth in the Statement of Basis/Final Decision and Response to Comments Summary, attached hereto as Appendix I and as outlined in Permit Conditions II.P.2 and II.P.3

II.P.2 The recommended corrective action for SWMU 2 is Alternative 2: Limited Action. Alternative 2: Limited Action consists of LUCs and long term ecological monitoring. The main contaminants at SWMU 2 are pesticides. The BRA identified three carcinogenic risks exceeding the $1E-6$ cancer threshold: for a future resident, it is $6E-5$; for the trespasser adult, it is $1E-5$; and for the trespasser adolescent, it is $8E-6$. There were no exceedences of the noncarcinogenic risk. The ecological BRA concluded that there is still a potential, although low, risk to the environment.

II.P.3 The groundwater, surface water, and sediment would be sampled under Alternative 2. Biomonitoring would be undertaken to determine the effectiveness of the Interim Remedial Action in alleviating the low remaining ecological risk. The purpose of the monitoring shall be to determine that the remaining low levels of contamination left by the IRA are not causing further harm to the environment and are not spreading significantly further than the current boundaries of SWMU 2. The groundwater, surface water and sediment would be sampled quarterly during the first year and annually for the next nine years. Three groundwater, three surface water and four sediment samples will be taken from selected locations and analyzed for pesticides and inorganic compounds. In addition, the groundwater samples will be analyzed for VOCs. If, after the first year, a class of compounds is not detected in a given medium, that class of compounds will cease to be analyzed for in subsequent sampling events for that medium. The biomonitoring would be conducted on a biennial basis and would consist of pesticide and metals analysis of twenty-five tissue samples from fish and toxicity testing on five surface water and five sediment samples.. The data will be used to conduct Five Year reviews.

II.P.4 The Permittee shall prepare and submit to the Regional Administrator, in accordance with the CAMP or no later than ninety (90) days of the effective date of this permit modification, a Corrective Measures Implementation Monitoring Plan to determine the

APPENDIX A

I. List of Solid Waste Management Units requiring an RFI:

<u>SWMU No.</u>	<u>Description</u>
1	Site #4 - Former Boca Chica Open Disposal Area
2	Site #5 - Former Boca Chica DDT Mixing Area
3	Site #10 - Fire-Fighting Training Area
4	AIMD Bldg. A980 Drainage Drum
5	AIMD Corrosion Control - Bead Blasting Area
7	Former Storage Unit
9	Jet Engine Test Cell

II List of Solid Waste Management Units with no known releases and requiring no further investigation at this time:

<u>SWMU No.</u>	<u>Description</u>
6	Waste Water Treatment Plant/Sludge Area

II List of RCRA Regulated Hazardous Waste Units:

<u>SWMU No.</u>	<u>Description</u>
7	Former Storage Unit
8	Permitted - New Storage Unit.