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LETTER REGARDING THE GEORGIA DEPARTMENT OF NATURAL RESOURCES COMMENTS ON HAZARDOUS WASTE STORAGE PERMIT APPLICATION DEFICIENCIEIS AT NSB KINGS BAY GA
5/25/1984
GEORGIA DEPARTMENT OF NATURAL RESOURCES

File 10

31547.000
19.02.00.0003

Department

ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S W
ATLANTA, GEORGIA 30334

~~JOE D. TANNER~~
Commissioner

J. LEONARD LEDBETTER
~~Division Director~~

Received 6/18

May 25, 1984

Captain R. G. Lowenthal
United States Navy
Naval Submarine Base
Kings Bay, Georgia 31547

RE: Notice of Deficiency

Dear Captain Lowenthal:

The hazardous waste storage permit application recently submitted by the Naval Submarine Base has been reviewed for completeness. In general, the application addresses most of the pertinent issues, however, several deficiencies were noted.

The following sections detail certain specific deficiencies noted in the review of the application. The regulatory references are to 40 CFR which the Georgia Rules for Hazardous Waste Management incorporate by reference. The comments are intended to illustrate the type of information and level of detail required. In certain cases specific deficiencies are indicated. In other cases the comments indicate a general lack of sufficient detail. Any revisions submitted should include specific instruction for insertion into your application:

Part A 122.6(a) & (b)	Please submit complete Part A.
A-17	Delete asbestos from Part A. (Asbestos is not a hazardous waste).
A-18	Facility Drawing
A-19	Facility Photograph
Part B	
264.13 Additional Requirements For Waste Generated Off-Site	Page C-15, paragraph 3-do not accept unknown waste for storage with other unknowns.
264.13, 264.17 Additional Requirements for Facilities Handling Ignitable Reactive or Incompatible Waste	Page C-15, paragraph 2-incompatible waste must be separated by more than just physical distance.

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264.175(b)(1) Basic Design Parameters, Dimensions and Materials of Construction	Need statement that base is free of cracks or gaps and is sufficiently impervious to contain leaks, spills and accumulated precipitation until the collected material is detected and removed.
264.175 Description of How Design Promotes Drainage or How Containers are Kept from Contact with Standing Liquids in Containment System	Describe handling and stacking of drums at the storage facility. Describe removal system in more detail. A) How are liquids removed? B) Describe decontamination of cells. C) Removal Equipment,(type & Location.
264.171 Container Management	When wastes in cans are consolidated, how are "empty containers handled? A) Triple-Rinsed, landfilled etc.? Sketch typical stacking and aisle space arrangement.
264.15 General Inspection Requirements	Inspection Log must include space for observations and nature of repairs. Expand schedule to include: A) Base B) Curbs C) Loading and unloading areas D) Communications E) First Aid Equipment F) Barrier Surrounding facility G) Decontamination Equipment
264.15(b)(4) Types of Problems	Describe types of problems to be checked for.
264.15(b)(4) Frequency of Inspection	Include inspection frequencies (note: some items may vary).

264.32(d) Water for Fire Control	You state that the nearest fire hydrant is 200 ft. from the facility. Do you have a 200 foot hose at the facility to access it? You must have water at adequate volume and pressure.
264.56(a) Emergency Response Procedures Notification	Include Georgia Emergency Response 404/656-4300.
264.56(d) Hazard Assessment	Describe procedures for determining the need for evacuation.
264.52(e) Emergency Equipment	State location of all emergency equipment. A) Emergency communication B) Emergency decontamination equipment.
264.52(f) Evacuation Plan	Illustrate primary and alternate evacuation routes.
264.56(j) Required Reports	Notification of one pound or other amount as specified (could be lower than one pound). Need statement that incident which require implementation of contingency plan will be incorporated into the operating record.
122.25(a)(13) Closure Plans	
I-1(a) Closure Performance Standard	Revise the second sentence to state that no wastes will remain in the storage area following closure, that remaining structures will be decontaminated, that tests will be conducted to verify the decontamination of structures, and that adjacent soils will be sampled and analyzed to determine if contaminated soil is present.

I-1(b)(c) Maximum Waste Inventory

Explain the apparent contradiction regarding the maximum inventory. Noting that on page D-3 the statement is made that the building is designed for 342 palletized 85 or 55 gallon drums, the maximum inventory could be either 29,070 gallons or 18,810 gallons, depending on the drum size used. Both figures exceed the process design capacity of 14,011 gallons, shown in the Part A, Form 3, permit application.

I-1(e) Inventory Removal and Disposal and Decontamination of Equipment

The description of cells 1 through 7, contained in D-1, indicates that cells 1 and 2 have a concrete floor with 2 inch curbs, and that the Navy is undertaking a project to add a concrete floor and curbs in cells 3 through 7. The description on page I-5, of the decontamination of the container storage cells, assumes that all cells have concrete floors and can be washed clean. Several modifications of I-1(e) are required:

1) Explain how decontamination of soils in cells 3 through 7 will be assured prior to the installation of concrete floors.

2) Add a contingency element to the closure plan, describing how decontamination of cells 3 through 7 will be accomplished should closure occur before the concrete floors are installed.

3) Provide for the disposition of rinse waters, should they test to be contaminated, and provide assurance that additional cleaning will be performed until decontamination has been achieved.

4) Add a segment on soil sampling and analysis marking on a map the places where samples will be taken. State that soil with concentrations of 261, Appendix VIII, (only test for material which you have handled in Appendix VIII) materials in excess of those found in a background sample will be considered contaminated and provide assurance that all contaminated soil will be removed and disposed. Mark the map to show where the background sample will be taken and explain why the location was chosen.

I-1(f) Schedule for Closure

On Figure I-1, Closure Schedule, add an element to show soil sampling and analysis and removal of any contamination found.

I-1(h) Closure of Other Potential Sources of Hazardous Waste 261.4(c) [Added]

Describe how storage tanks, transport vehicles, pipelines, process equipment, etc. (in which hazardous waste or hazardous material is handled) will be decontaminated at closure and hazardous waste disposed of. Note that waste generated in such units becomes regulated only when it exits the unit unless it remains in the unit more than 90 days after the unit ceases to be operated.

Identify any areas where the routine handling of hazardous waste and/or hazardous material could conceivably have resulted in the gradual contamination of soil. Describe how the soils in such areas will be sampled and analyzed and how any contaminated soil, thus detected, will be removed.

Please submit all revisions to this office by July 1, 1984. If you have any questions, please contact Jim Ussery at 404/656-7802.

Sincerely,

Jennifer R. Kaduck
Unit Coordinator
Industrial & Hazardous Waste
Management Program

JRK:jub:51

File: Naval Submarine Base (R)