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NSB KINGS BAY
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LETTER REGARDING SUBMITTAL OF RCRA FACILITY INVESTIGATION WORK PLAN FOR REVIEW AND APPROVAL WITH ATTACHMENTS NSB KINGS BAY GA
4/10/1990
NSB KINGS BAY

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COMPLETE

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N521/0957
10 APR 1990

Georgia Department of Natural Resources
Hazardous Waste Management Program
Environmental Protection Division
Attn: William Hendrix
205 Butler Street, S.E., Suite 1154
Atlanta, Georgia 30334

RESOURCE CONSERVATION ACT (RCRA) FACILITY INVESTIGATION (RFI) PLAN FOR NAVAL SUBMARINE BASE KINGS BAY HAZARDOUS WASTE FACILITY PERMIT

The RFI Plan for Naval Submarine Base, Kings Bay, Georgia is submitted for your approval as required by our Hazardous Waste Facility Permit HW-014(S)(2). For further information, please contact Mr. James More, (912) 673-4759.

Sincerely,

J. N. REVER
Captain, CEC, U. S. Navy
Public Works Officer
By direction of
the Commanding Officer

Encl:
(1) RFI Plan

RESOURCE CONSERVATION ACT (RCRA)
RCRA FACILITY INVESTIGATION (RFI) PLAN

KINGS BAY NAVAL SUBMARINE BASE (KBNSB)

I. Potential Pathway To Be Investigated.

A. Purpose. Groundwater monitoring will be performed to investigate the need for further or permanent monitoring for groundwater contamination from three of the four inactive landfill sites referenced in the Hazardous Waste Facility (HWF) Permit, number HW-014(S)(2). Investigation of potential groundwater contamination was requested by the Georgia Department of Natural Resources (DNR) during the RCRA Facilities Assessment.

B. Specific Actions.

1. Army Reserve Disposal Area, Towhee Trail.

This disposal site was used by the Army Reserve from approximately 1969 to 1974. The site covers a total area of approximately 8.5 acres located on both sides of Towhee Trail (see exhibit 1). The area on the west side of the road is reportedly about 7 acres in size while that on the east side is about 1.5 acres. The areas were both excavated to a depth of five feet before wastes were placed in them. Wastes disposed of in the site included tree stumps, wooden pallets, metal ammo boxes (some empty and some filled with concrete), aluminum sheeting, concrete blocks and kitchen waste. Also, a large pile of dredge spoils and gravel (from abandoned railroad tracks) were spread over most of the western portion of the site. The spoils and gravel were spread to a depth of about 2 feet. Burning of wastes occurred twice a year on the western side of the road. No burning occurred on the eastern side of the road. A total of approximately 30 to 40 gallons of diesel fuel and waste engine oil were used to ignite the wastes.

Therefore, over the 5 years that the site was in use a total of 300 to 400 gallons of waste oil and fuel were burned. Quantities of wastes disposed are approximated at 69,000 cubic yards.

This site will be studied as requested under the HWF Permit RFI requirements. Four monitoring wells will be installed (one upgradient and three downgradient) at this site.

2. Old Camden County Landfill.

Located in the far western area of the activity (see exhibit 2), this 35 acres landfill was operated by Camden County from 1974 to October 1981 (Knowlton, 1981). Reportedly, hazardous wastes were not accepted at the landfill. Only domestic wastes were accepted including general household and office wastes, scrap paper, wood, and sludge and grit from the base wastewater treatment plants. The landfill was a trench and fill operation with trenches oriented in an east-west direction across the landfill (approximately 800 feet long by 20 feet wide). Excavation was into the water table which is four to eight feet below the surface at the site. Burning of wastes took place once per week during the first year of the operation only. This practice was discontinued in 1975. At the end of each day the wastes and ashes were compacted and covered with at least six inches of soil. Upon closure, a final soil cover of two feet was placed on the landfill. Estimated waste quantity is 500,000 cubic yards.

This site will be studied as requested under the HWF Permit RFI requirements. Six monitoring wells will be installed (two upgradient and four downgradient) at this site.

3. Army Reserve Disposal Area, Existing Dry Dock.

Site 12 is located along Kings Bay in the dry dock area (see exhibit 3). The site was used by the Army Reserve for amphibious ship-to-shore materials loading and offloading training operations from 1974 to 1978. The size of the disposal area is approximately 41 acres. Wastes included empty wooden and metal ammo boxes, concrete slabs, dummy cargo, and six to eight 55-gallon drums of waste engine oil.

Waste quantity was estimated at 467,000 cubic yards. In 1983, a contractor operating a backhoe at the site uncovered six to eight 55-gallon drums of waste oil. One of the drums was punctured by the backhoe, causing a spill. The stained soils and drums were removed from the base by a waste disposal contractor in 1983. The remaining inert wastes were excavated in late 1983 and buried in the dredge spoil area. Since all wastes were excavated from the Site 12, this site does not pose a potential threat to human health or to the environment. Therefore, no further action under the NACIP program is recommended for Site 12.

Since, in 1983 all the drums of oil and stained soil were removed and disposed of by a waste disposal contractor and the remaining inert wastes relocated this area will not be part of the RFI program.

4. Army Reserve Disposal Area near Old Sewage Lagoon 3990.

This site, located west of Woodrow Wilson Avenue and south of old sewage lagoon 3990 (see exhibit 4), was used every six months by the Army Reserve from 1958 to 1964. The site covered an area of one acre and was excavated three to five feet deep. Wastes disposed here included food, wood, trash, scrap metal, tree limbs, and empty paint and solvent cans (about 1 or 2 gallon cans per month). The waste quantity is estimated at approximately 4000 cubic yards. Reportedly, burning of waste took place at this site. It is unknown how often burning occurred or if any fuel was used to ignite the wastes. The site was covered with soil upon closure.

This site will be studied as requested under the HWF Permit RFI requirements. Four monitoring wells will be installed (one upgradient and three downgradient) at this site.

5. All Sites.

The groundwater monitoring wells will sample the water table aquifer as described in the Initial Assessment Study of Naval Submarine Base Kings Bay, Georgia NEESA 13-086 of September 1985. The Monitoring wells will be installed per the guidelines in the Georgia Environmental Protection Division, Manual for Groundwater Monitoring of April 1988.

The general pattern of groundwater flow has been established as moving from west to east, where it discharges naturally to the tidal streams that flow into Kings Bay. Based on this fact the upgradient monitoring wells will be located to the west of the sites and the downgradient monitoring wells will be east of the sites.

Initial testing will be done for all wells every other month for one year to establish background data concerning the water table quality. From this initial monitoring it will be determined what, if any, further monitoring will be necessary. Testing Parameters to be tested for at each sampling event will be all compounds on the Clean Water Act Priority Pollutant List plus chlorides, specific conductance, total organic carbon (TOC), and pH. All sampling will be done according to the Groundwater Monitoring Plan Kings Bay Naval Submarine Base, exhibit 5.

II. Schedule Of Implementation.

The following schedule of implementation is provided.

1.	14 May 90	Initiate Design
2.	27 Jul 90	Design Complete
3.	21 Dec 90	Construction Complete
4.	21 Dec 90	Begin Initial Sampling
5.	30 Dec 91	End Initial Sampling
6.	31 Jan 92	Finish Analysis
7.	30 Mar 92	Submit Final Report and Recommendations

III. Pathways Not Selected To Be Investigated.

1. General. If further information becomes available, ither through the groundwater monitoring and investigation or from other sources, which would point out the need to investigate the pathways not selected they will be added to this RFI.

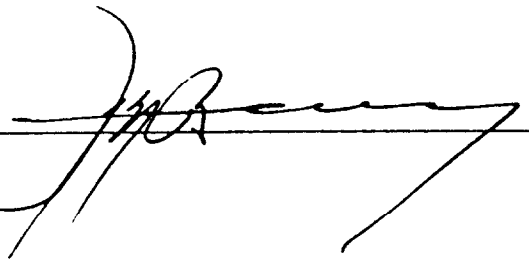
2. Air. The areas to be investigated are all landfills. Considering the age of these landfills, the type materials placed in them, and the fact that the materials are now covered the air pathway is not selected for investigation.

3. Surfacewater. Based on personal observations and areal photographs the vegetation, which would be effected by surfacewater contamination, appears to be healthy. Again, considering the fact that these solid waste management units are landfills it is not likely that surfacewater contamination would be a potential pathway.

4. Land. Considering the stable nature of the material known to have been placed in the landfills and the lack of erosion for transportation of soils offsite this is not a potential pathway of migration.

IV. Certification.

I certify under penalty of law that this document and all the attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature  Date 4/10/90

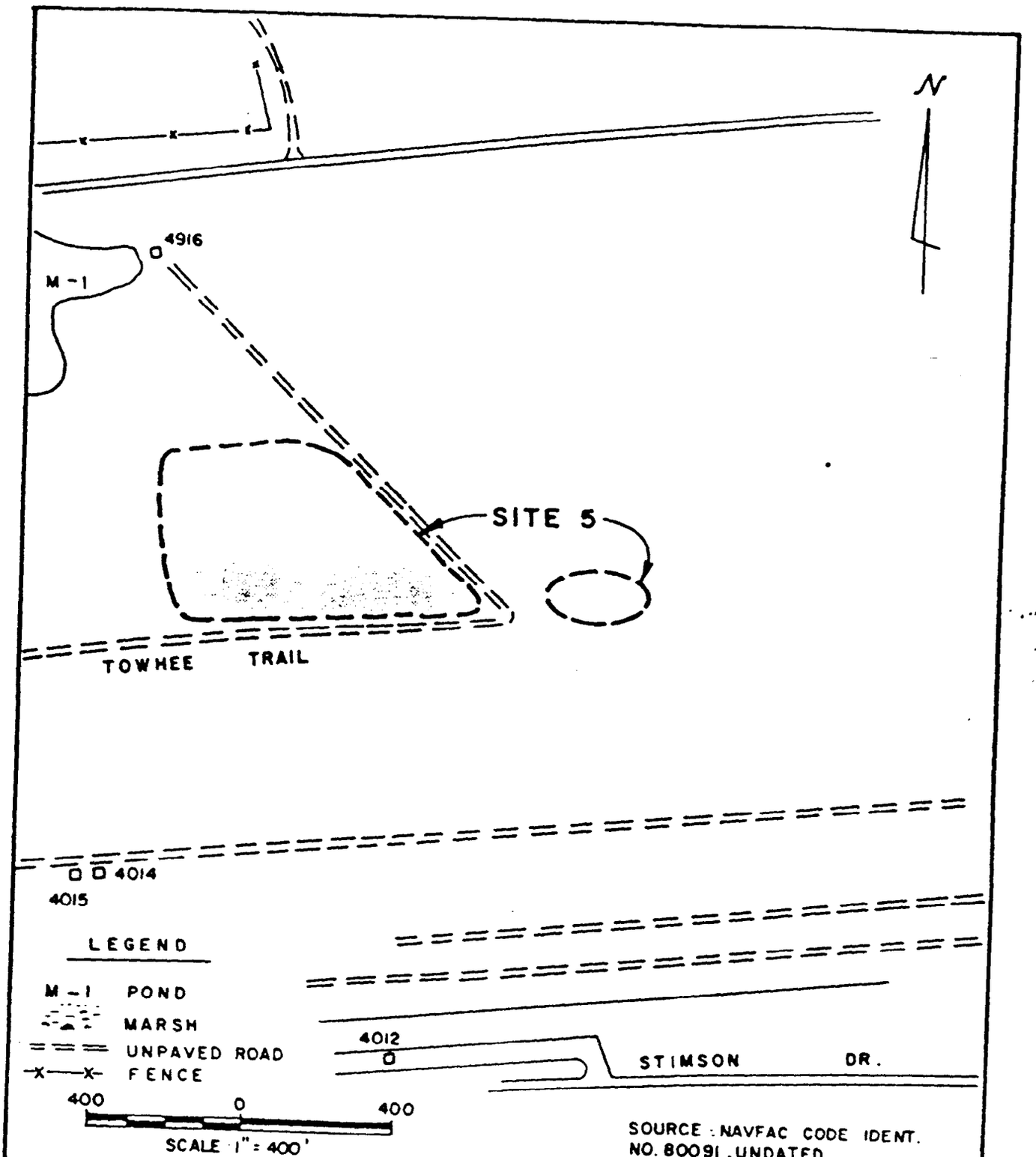


FIGURE 2-6
SITE 5 - ARMY RESERVE DISPOSAL AREA, TOWHEE TRAIL.

INITIAL ASSESSMENT STUDY
NAVAL SUBMARINE BASE
KINGS BAY, GEORGIA

EXHIBIT 1

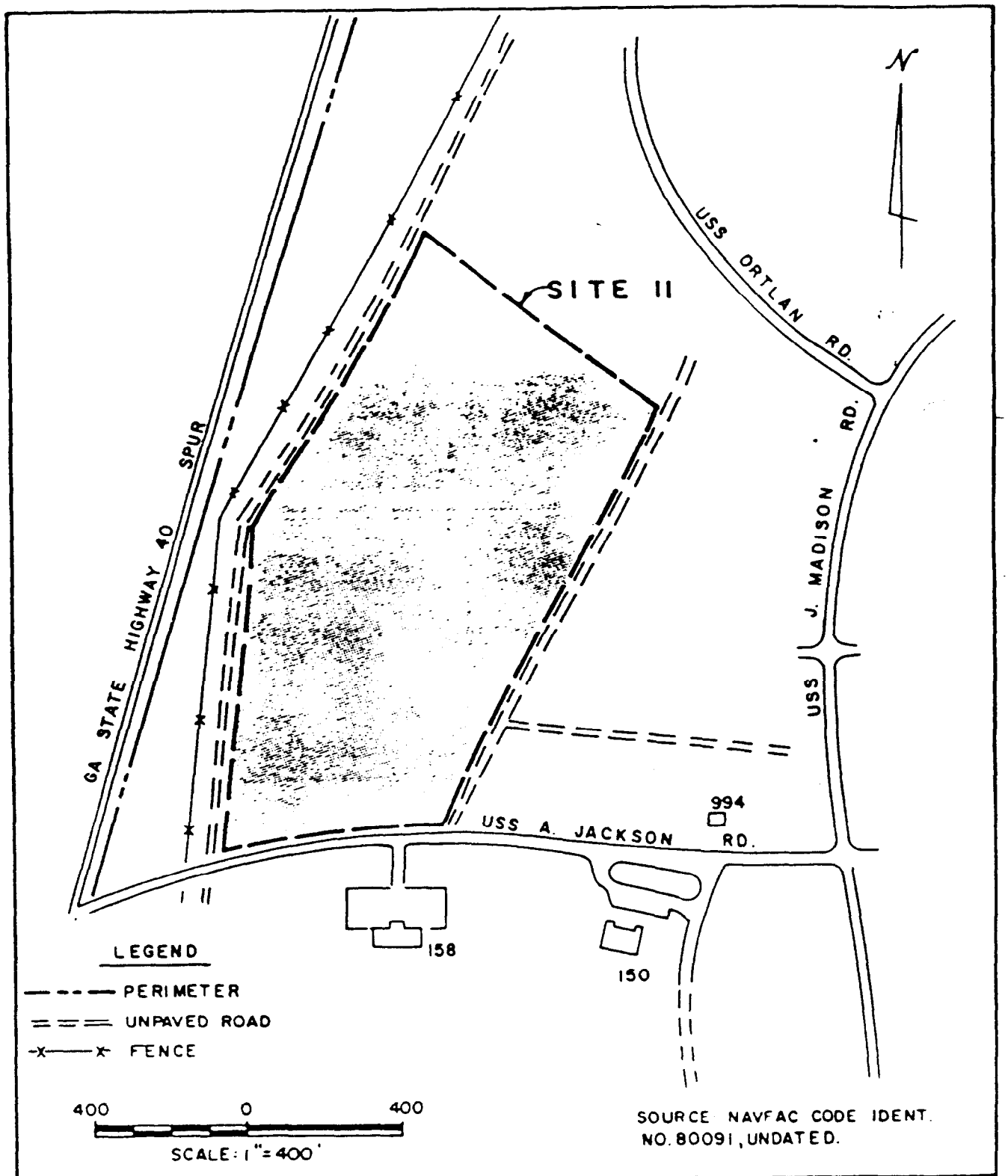


FIGURE 2-8
SITE II - OLD CAMDEN COUNTY LANDFILL.

INITIAL ASSESSMENT STUDY
NAVAL SUBMARINE BASE
KINGS BAY, GEORGIA

EXHIBIT 2

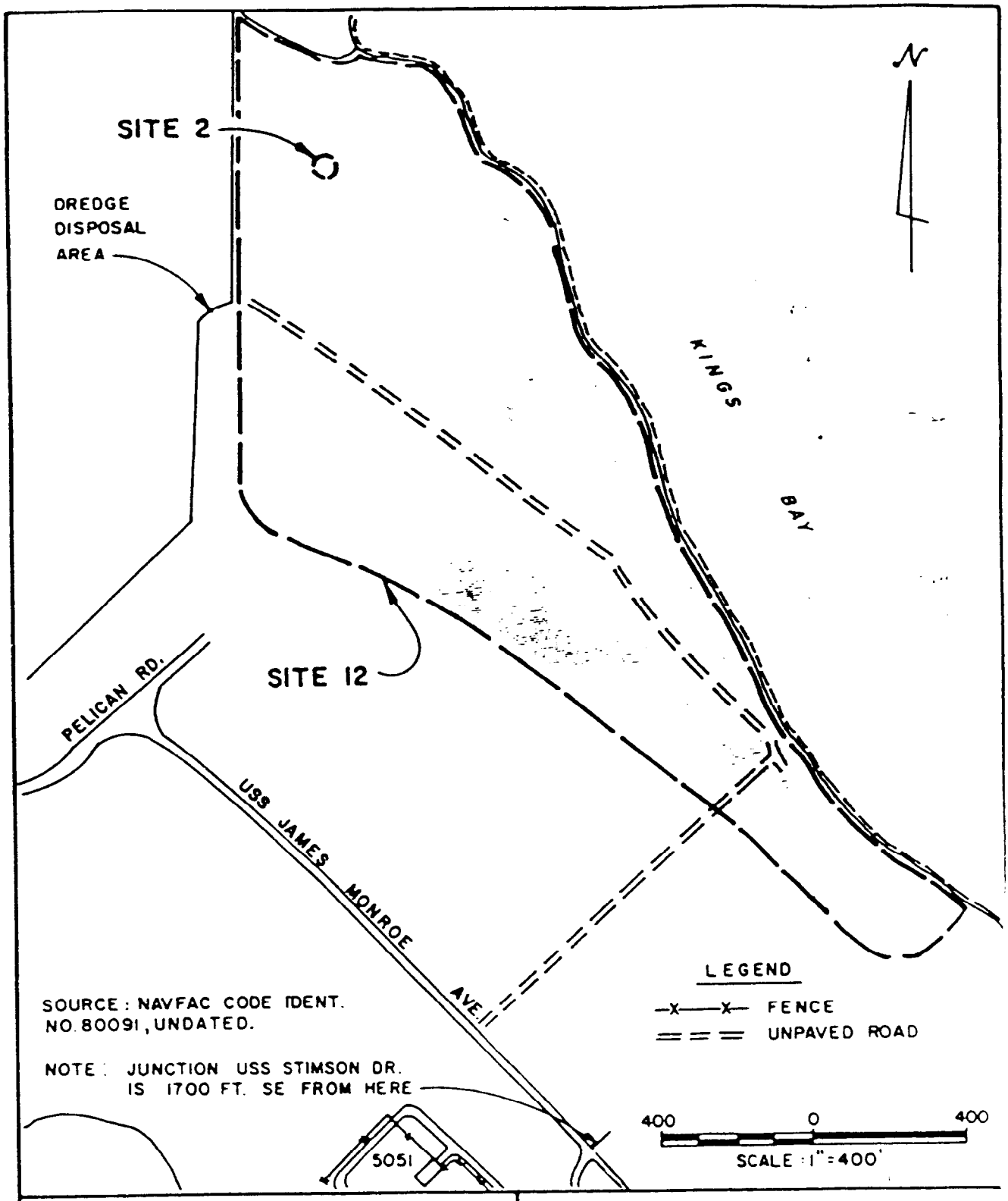


FIGURE 2 - 3
SITE 2 - FIRE FIGHTING PIT.
SITE 12 - ARMY RESERVE DISPOSAL AREA, FUTURE DRY DOCK.

INITIAL ASSESSMENT STUDY
NAVAL SUBMARINE BASE
KINGS BAY, GEORGIA

EXHIBIT 3

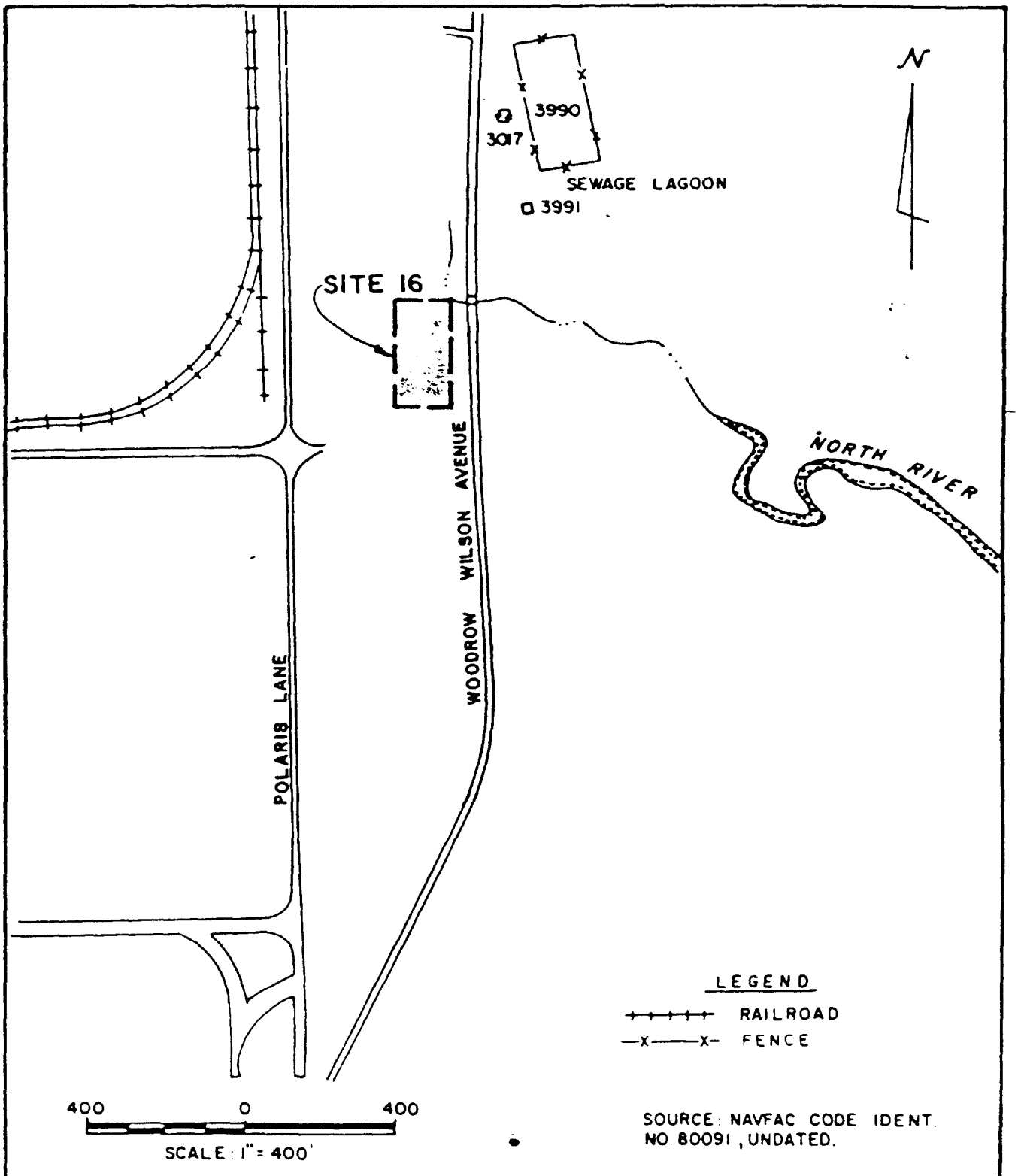


FIGURE 2 - 9

SITE 16 - ARMY RESERVE DISPOSAL AREA NEAR OLD SEWAGE LAGOON 3990

INITIAL ASSESSMENT STUDY
NAVAL SUBMARINE BASE
KINGS BAY, GEORGIA

EXHIBIT 4

GROUNDWATER MONITORING PLAN KINGS

BAY NAVAL SUBMARINE BASE

PREPARED BY JAMES E. MORE

APRIL 30, 1990

GROUNDWATER MONITORING PLAN KINGS BAY NAVAL SUBMARINE BASE

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FIGURE

GROUNDWATER MONITORING PLAN KINGS BAY NAVAL SUBMARINE BASE

1. PURPOSE - SCOPE.

The purpose of this plan is to provide groundwater sampling and analysis procedures. The testing objectives, for any particular project, will be specified ahead of time within the ground water monitoring section of the project. This plan outlines the requirements for groundwater monitoring at Kings Bay Naval SUBASE. This plan identifies requirements for well preparation, sampling, sample handling and preservation, chain of custody, analytical procedures, and field and laboratory quality control.

2. WELL PREPARATION.

Before any sampling is done the monitoring well must be evacuated of water before taking the sample. For rapid recovery wells, which cannot be evacuated, 3 well volumes will be removed instead of complete evacuation. The following equipment will be required for well preparation.

Item	Quantity
Plastic sheet (approx 8'x 8')	1 ea.
Plastic gloves	3 Pair (min.)
Bailer	1 ea.
Electronic sounder	1 ea.
Bailer rope, nylon	1 roll
Scissors or knife	1 ea.
Volumetric container (2 gal)	1 ea.
Dish Pan	2 ea.
Aluminum foil	1 roll
Trash bag, large	1 ea

Only bailers of teflon or 316 stainless steel will be used. New nylon rope will be used for bailer rope. Clean unused plastic gloves will be worn as indicated in this procedure. The following procedures will be performed when evacuating wells.

A. Assemble Equipment.

1. Place a plastic sheet, such as a painter's drop cloth, around the well as a work area. Unlock the protective well casing.

2. Bring the sounder to the plastic sheet. The sounder probe will have been precleaned in the lab and wrapped in foil. Unwrap without touching it.

3. Put on a pair of new gloves. Unlock and remove the well cap. Place it top-down on a corner of the plastic sheet.

B. Calculate the volume of water to be evacuated:

1. Use the sounder to measure the distance from the top of the casing to the top of water.

2. Subtract the distance from the top of the casing from the distance to the bottom of the well, provided by the well log, to obtain the height (h) of the column of water in the well.

3. Multiply h times the appropriate conversion factor to obtain the volume of water in the well in gallons.

   a. For a 2-inch inside diameter well, h x 0.1623 = Volume (gal)

   b. For a 4-inch inside diameter well, h x 0.6 = Volume (gal)

4. Clean the sounder probe by rinsing with isopropanol followed by distilled water. Wrap in foil for use on the next well.

C. Evacuate the Well

1. Bring 2 dishpans and a measuring container to the plastic sheet and line one dishpan with aluminum foil.

2. Bring the bailer, which has been precleaned in the laboratory and wrapped in foil, to the plastic sheet. Unwrap it without touching the bailer.

3. Bring the roll of bailer cord to the sheet. This roll has also been covered with foil to keep it clean. Place it in the unlined dishpan and unwrap it without handling the rope.

4. At this point both bailer-handler and helper will put on a new pair of gloves.

5. The end of the bailer rope is tied to the top of the bailer. Use foil where needed to assure that the rope does not touch any item while in use.

6. The bailer is lifted and lowered carefully into the well until it is submerged.

7. The bailer is raised in a hand over hand manner and the rope is allowed to fall into the dishpan lined with foil.

8. Pour groundwater from bailer into the measuring container. Repeat bailing procedure until a 3 times the volume of water in the well has been evacuated. If the bailer touches the measuring container, line the lip with aluminum foil.

9. If the well goes dry before 3 volumes is obtained, then stop evacuating the well.

10. Save the evacuated water in the measuring container for proper disposal.

11. The used gloves, bailer rope, foil and the plastic sheet are rolled up and discarded in a large trash bag provided.

D. Replace the well cap and lock protective casing. Allow up to 24 hours for well water stabilization.

3. SAMPLING PROCEDURE:

When more than one well is to be sampled sample the upgradient wells first and then proceed to the more contaminated or downgradient wells. The following equipment will be required for sampling wells.

Item	Quantity
Plastic sheet (approx 8'x 8')	1 ea.
Plastic gloves	3 Pair (min.)
Bailer	1 ea.
Bailer rope, nylon	1 roll
Bailer rope, teflon	1 roll (when needed)
Scissors or knife	1 ea.
Sample Bottles	1 set (no. varies per analysis)
Labels (for sample bottles)	1 set
Permanent marker pen	1 ea.
Ice cooler	1 ea.
Ice	1 bag
Dish Pan	2 ea.
Aluminum foil	1 roll
Trash bag, large	1 ea

Only bailers of teflon or 316 stainless steel will be used. New nylon rope will be used for bailer rope. Where organic contaminants are of interest use teflon rope for the first 10 feet of cord and discard after each well. It is advisable to take an extra set of sample bottles to the field in case of breakage or accidental contamination. It is not good practice to leave samples in the sun. Sampler will be removed to the ice chest as soon as soon as possible. Clean unused plastic gloves will be worn as indicated in this procedure.

A. Assemble Equipment.

1. Place a plastic sheet such as a painter's drop cloth, around the well as a work area, to prevent sample bottle contact with the ground. Unlock the well cap.

2. If the labels are not pre-filled out label them now. The label must have:
   a. Name of location
   b. Date of sampling and time
   c. Sample description including monitoring well ID No.
   d. Sample No.
   e. Sampler's name

Note that several bottles collected for different parameters will have the same ID number if they come from the same sampling point.

3. Bring 2 dishpans to the sheet and line one with aluminum foil.

4. Arrange sample bottles on the sheet. Place a waste water container in the vicinity of the well.

5. Bring the bailer, which has been precleaned in the laboratory and wrapped in foil, to the plastic sheet. Unwrap it without touching the bailer.

6. Bring the roll of bailer cord to the sheet. The roll is also covered with foil to keep it clean. Place it in the unlined dishpan and unwrap it without handling the rope.

7. Unlock and remove the well-cap. Place it top-down on a corner of the plastic sheet.

B. Sampling procedure.

1. At this point both bailer-handler and helper will put on a new pair of gloves.

2. Tie the end of the bailer rope to the top of the bailer. The rope must not touch anything but clean aluminum foil. Use foil where needed. Do not allow the bailer to touch the sample bottles, or allow any rope end or gloved fingers to contact the sample well water while pouring.

3. The bailer is lifted and lowered carefully into the well until it is submerged.

4. The helper will unscrew the appropriate sample caps and place them top down on the plastic sheet without touching the interiors or dislodging any teflon discs inside the caps.

5. The bailer is raised in a hand over hand manner and the rope is allowed to fall into the dishpan lined with foil. The first bailer-full is discarded into the waste container.

6. The samples are poured into the bottles without bubbles, and are filled to the top without headspace. The helper can hold the bottle and be responsible for recapping without touching the interior of the cap, and screwing down tightly. Samples will be placed in an ice chest as soon as possible.

7. Organic samples are the most delicate and should be collected first and as soon as the well has settled. The vial for volatile analysis must be filled so that the sample has a meniscus. The cap is slid over it and closed so that no bubbles can be seen when the sample vial is upended. The volatile samples are always collected in pairs. Other organics usually require two or three 1-liter bottles without preservative and these should be collected next, also without headspace.

   If a sample is to be collected for dissolved metals it will not have preservative and should be collected next. If there is a sediment problem this sample will be collected right after the volatile samples in order to minimize the sediment requiring removal.

   Finally, preserved samples will be collected, taking great care that the acids and salts in the bottles do not contact the helper's gloves and thus pass to other caps and bottles.

8. All remaining sample bottles should now be carried to the ice chest where they are labeled and iced down.

9. The well cap is replaced and locked. Lock the protective well casing.

10. The used gloves, bailer rope, foil and plastic sheet are folded up and discarded in a large trash bag provided.

11. Proceed to the next well and repeat the procedure.

C. BAILER CLEANING

The best procedure is one bailer for one well. However, when this is not possible a single bailer may be cleaned between wells as follows:

1. The sampler, without removing gloves, will untie the rope and open the bailer to allow the helper to pour distilled water into and around the bailer. This will be shaken and poured out.

2. The helper will then pour spectrograde isopropanol into and around the bailer. It is again shaken and poured out.

3. A final rinse is now performed with distilled water in copious amounts into and around the bailer.

4. A fresh piece of aluminum foil is placed on the plastic sheet and the bailer is placed in it. The foil is folded around it for carrying.

5. When sampling is finished the bailer is then returned to the laboratory for a thorough cleaning and foil wrapping.

NOTE 1: For wells that are badly contaminated with insoluble wastes field cleaning is not recommended.

NOTE 2: If isopropanol appears in the test results, a resampling will have to be done.

C. SPLIT SAMPLES

In order to keep sample handling to a minimum the parallel splitting procedure should be used.

1. The 2 sample bottles for a given test are lined up and caps removed.

2. One bailer-full is poured into one bottle, and the next bailer-full is poured into the other bottle, alternating until the 2 sample bottles are full. They are then capped as usual.

3. The 2 sample bottles for another test are then lined up, and filled as in 2.

4. This procedure is continued until all test bottles for a given well are filled for both parties.

4. SAMPLE HANDLING AND PRESERVATION

A. General

All sample bottles should be filled to the top, capped with a teflon seal, and be placed on ice immediately after sampling. On arrival at the laboratory they are transferred to a refrigerator. Samples for volatile organic analysis must be filled to the top without headspace. Special vials with septum caps are available for this purpose. Figure 4-1 provides preservation procedures and holding times for samples.

B. Dissolved Metals

The well water must not receive preservative before performing a filtration to remove the sediment which may have been stirred up during the purging operation. The sample bottle is filled to the top without headspace, placed on ice, and filtered in the laboratory immediately after arrival. A 0.45 micron filter disc is used and the filtrate receiving flask must contain the acid preservative. The filtrate is tested for the Drinking Water Standard Metals.

C. PH and Specific Conductance

Ph and Specific Conductance will be performed immediately after collection. The calibration and procedure will be recorded in the field log book. If the samples are returned to the laboratory, they should be tested immediately on arrival and this alternate procedure recorded.

D. Sample Transportation

Sample delivery to the laboratory will be in the shortest possible time after collection. If delay is incurred this will be entered in the field log book along with the time increment.

E. Blanks and Background

A distilled water blank will be carried to the field and put through the entire sampling procedure for each sampling event. If positives are found, this will alert the collector to field sampling error.

Figure 4.1
Preservation Procedures and Holding Times

Parameter	Recommended Container	Preservative Indicators of Groundwater Contamination	Holding Time	Volume Required For One Analysis
ph	T, P, G	Field determined	None	25 ml
Specific conductance	T, P, G	Field determined	None	100 ml
TOC	G, T-lined cap	Cool 4°C HCL to ph 2	28 days	4 x 15 ml
TOX	G, amber, T-lined septa or caps	Cool 4°C, add 1 ml of 1.1M sodium sulfite	7 days	4 x 15 ml
Chloride	T, P, G	4°C	28 days	50 ml
Arsenic Barium Cadmium Chromium Lead Mercury Selenium	T, P	Total Metals Field Acidified to ph 2 with HNO3 Dissolved Metals 1. Field filtration if possible 2. Acidify the filtrate to ph 2 with HNO3	6 months 6 months	1,000 ml 1,000 ml
Fluoride	T, P	Cool 4°C	28 days	300 ml
Nitrate/Nitrite	T, P, G	4°C/H2SO4 to ph 2	14 days	1,000 ml
Volatile Organics	G, T-lined septa or caps	Cool 4°C	7-14 days (extract in 5 days)	60 ml
Pesticides	G	Cool 4°C	(5 days to extract) 30 days	2,000 ml
Extractable Organics	G	Cool 4°C	30 days (extract in 5 days)	
Cyanide	P, G	Cool 4°C NaOH to ph 12 0.6g ascorbic acid (see method)	14 days*	500 ml
Oil & Grease	G only	Cool 4°C, H2SO4 to ph 2	28 days	100 ml
Phenols	G	Cool 4°C, H2SO4 to ph 2	(5 days to extract) 30 days	500 ml

* Unless sulfide is present, then 24 hours (see lab method)
P = polyethylene, G = glass, T = fluorocarbon resins (Teflon, PTFE, FEP, etc.)

5. CHAIN OF CUSTODY

Custody and protection of samples is an important legal consideration. As few people as possible should handle the samples. The sampler is personally responsible for collected samples, and must be able to attest to the integrity of samples until transfer. Any ice chest must be locked or located in a place which is locked, and having access only by responsible officials. The Chain of Custody Record SUBASE Kings Bay Form 5090/11 will be used. See figure 5.1. Each time the samples are transfered from one individual to the next the chain of custody form must be signed, dated, and time recorded by both the persons. If the samples are to be shipped they must be sealed. The driver for the delivery service must sign the chain of custody form and a bill of lading must be secured. All chain of custody sheets must be returned and kept on file with the analysis for three years.

6. ANALYTICAL PROCEDURES

All analytical procedures used will be performed using methods specified in EPA Manual SW-846 or EPA manual 600/4-79-020, use latest editions.

7. FIELD AND LABORATORY QUALITY CONTROL

A. Field Quality Control.

A field sampling logbook recording field observations and events will be kept.

1. A field blank will be part of each sampling event. Distilled water is taken to the site, and handled like a sample. It is poured into a bailer, and sample bottles filled using identical technique. Analysis of the blank alerts the sampler to technical error. The blank test results are not used to correct the sampler results, but are reported as-is. If the contaminant levels in the blank are within one order of magnitude of the groundwater sample results, the wells should be resampled.

2. All field instruments will be calibrated prior to field use and recalibrated in the field before measuring each sample.

B. Laboratory Quality Control

Laboratories will follow quality control criteria as specified per EPA guidelines. This will include running spiked samples to determine percent recovery. Spiked sample results along with % recovery will be included with laboratory reports.

FIGURE 5.1

CHAIN OF CUSTODY RECORD KINGS BAY NAVAL SUBASE

KINGS BAY, GA 31558

PROJECT NAME

SAMPLERS (SIGNATURE)

STATION NO.	DATE	TIME	SAMPLE TYPE COMP.GRAB	SAMPLE ID NUMBER	NO. OF CONTAINERS	DESCRIPTION

RELINQUISHED BY (SIGNATURE)	DATE/TIME	RECEIVED BY (SIGNATURE)	REMARKS
RELINQUISHED BY (SIGNATURE)	DATE/TIME	RECEIVED BY (SIGNATURE)	
RELINQUISHED BY (SIGNATURE)	DATE/TIME	RECEIVED BY (SIGNATURE)	

Agency review of the requested permit modification, as provided under the provisions of 40 CFR 270.42(B)(6)(vii), until such time as Georgia processes your permit modification.

Please indicate your concurrence with EPA's request by providing within thirty (30) days of the date of this letter a letter of consent to this Agency which incorporates language similar to the following:

> "Effective this _____day of_____, 19____, (FACILITY NAME), EPA I.D. No. (XXX-XXX-XXX), does hereby consent to allow the United States Environmental Protection Agency to defer review and action on the Class 2 permit modification request submitted by this facility on (DATE), until such time as the State of Georgia adopts the Toxicity Characteristics rule, promulgated March 29, 1990, (FR 117998) and processes the permit modification."

It is also requested that you provide a copy of the the letter of consent to the Georgia Environmental Protection Division. Please be advised that by consenting to allow EPA to defer review, your facility will continue to maintain the temporary authorization to manage TC wastes granted by 40 CFR 270.42(b)(6)(iii-v) as a result of your Class 1 and 2 permit modification requests. The temporary authorization will remain in effect until Georgia and/or EPA issues its determination on your Class 2 permit modification request. As previously advised, your consent, or conversely your refusal to consent, will not shield you from the State's requirements after the State adopts the TC rule into their regulations.

Your cooperation in this matter is greatly appreciated. If you have any questions regarding this request or any other issues related to your Class 2 permit modification, please contact Ms. Susan Zazzali at (404) 347-3433.

Sincerely yours,

James H. Scarbrough

James H. Scarbrough, P.E. Chief
RCRA and Federal Facilities Branch
Waste Management Division

cc: Jennifer Kaduck, GAEPD