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NSB KINGS BAY
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LETTER REGARDING RESOURCE CONSERVATION AND RECOVERY ACT PERMIT
MODIFICATION NSB KINGS BAY GA
3/29/1991
NSB KINGS BAY

31547.000
19.02.00.0009

5090
Ser N521/114/
29 MAR 1991

U.S. EPA Region IV
Attn: James H. Scarbrough, P.E.
Chief, RCRA & Federal Facilities Branch
Hazardous Waste Management Division
345 Courtland Street, NE
Atlanta, Georgia 30365

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT MODIFICATION

In reply to your request of February 12, 1991, we submit the following:

Mr. Scarbrough granted an extension to April 2, 1991, for our reply. We are requesting a class 2 permit modification for the RCRA Part B Hazardous Waste Storage Permit for Naval Submarine Base, Kings Bay, permit number HW-014(S)(2). This modification is to cover the Toxicity Characteristic Leaching Procedure (TCLP) and the "characteristic" organic constituents addressed in the 29 March 1990 Federal Register and other minor permit modifications needed to address current operations. Enclosed is a Description of Proposed Changes and the modified Part B Permit application.

The modified Part B Permit Application describes those wastes generated by the SUBASE which were previously RCRA regulated under other waste classifications. It also addresses those waste streams which are newly regulated under RCRA but which we would like to have incorporated into the permit if the need to store these wastes arises. The minor changes are addressed individually in the Description of Proposed Changes, enclosed.

For further information, please contact Mr. James More, (912) 673-4759.

Sincerely,

C. A. JOHANNESMEYER
Captain, CEC, USN
Public Works Officer
By direction of the
Commanding Officer

Enclosures:

- (1) Description of Proposed Changes
- (2) Part B Permit Modifications

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

DESCRIPTION OF PROPOSED CHANGES

<u>Section/Page</u>	<u>Description</u>	<u>Proposed Change</u>
Form 3510-3/ pgs 3A-3C	EPA Waste Numbers and Estimated Quantities of stored wastes	1. Correcting Typo's, ie the 2nd D001 and P001-P007 change to D002 and F001- F007. 2. Deletion and addition of other EPA Waste Numbers including addition of the Toxicity Characteristic Leaching Procedure(TCLP) Organics (D018-D043)
Sect C/pg C-8	Waste Analysis Plan	1. Change analytical requirement from EP Toxicity to TCLP.
Sect C/pgs C-2 to C-7	Table C-1, Hazardous Waste SUBASE Kings Bay	1. Adding TCLP Organics waste Numbers to existing waste streams. 2. Deletion of waste streams not being generated. 3. Addition of New TCLP and listed waste streams. 4. Changing EPA Waste Code from "E" for EP Toxicity to "TC" for TCLP.
Sect C/pg C-14	Characterization of an Unknown Waste	1. Change analytical requirement from EP Toxicity to TCLP. 2. Clarify what analyses are required for storage and what analyses are required for disposal (para 4)

Enclosure (1)

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(1) (1)

<u>Section/Page</u>	<u>Description</u>	<u>Proposed Change</u>
Sect C/pgs C-16 to C-23	Table C-3, Waste Analysis Protocol SUBASE Kings Bay	1. Change analytical requirement from EP Toxicity to TCLP. 2. Update list to reflect table C-1 changes
Sect C/pg C-24	Table C-4, Test Methods	1. Change analytical requirement from EP Toxicity to TCLP. 2. Add Test methods for Toxicity Characteristic organics.
Sect F/pg F-2	Security	1. Modify statement concerning fence around hazardous waste storage facility. 2. Change location of warning signs from on fence to on the building.
Sect G/pg G-6	Emergency Coordinators	1. Change of address.
Sect I/Pgs I-4 & I-5	Closure Plan	1. Change analytical requirement from EP Toxicity to TCLP.