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NSB KINGS BAY
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LETTER REGARDING GEORGIA DEPARTMENT OF NATURAL RESOURCES APPROVAL
TO MODIFY EXISTING HAZARDOUS WASTE PERMIT TO ACCOUNT FOR CORRECTIVE
ACTION PLAN AND ADDITION OF MUNITIONS WASTE FROM OPEN BURNING/OPEN
DETONATION TREATMENT NSB KINGS BAY GA
7/31/1998
GEORGIA DEPARTMENT OF NATURAL RESOURCES

Georgia Department of Natural Resources

205 Butler Street, S. E., Suite 1162, Atlanta, Georgia 30334

Lonice C. Barrett, Commissioner

Environmental Protection Division

Harold F. Reheis, Director

404-656-2833

NSB Kings Bay Administrative Record
Document Index Number

July 31, 1998

Mayor Samuel K. Dixon
Post Office Box 250
Kingsland, GA 31548

31547-000
13.01.00.0108

RE: Naval Submarine Base - Kings Bay
Hazardous Waste Facility Permit

Dear Mayor Dixon:

On September 29, 1989, the Environmental Protection Division (EPD) issued Hazardous Waste Facility Permit No. HW-014(S)(2) to the Naval Submarine Base, Kings Bay ("Subbase") for the storage of hazardous waste and for corrective action for prior and continuing releases of hazardous constituents. In April 1998, the Navy requested modification of that permit to incorporate the Corrective Action Plan for the Old Camden County Landfill, and to increase the amount of waste munitions treated by open burning and open detonation ("OB/OD") in their Explosive Ordnance Disposal ("EOD") unit.

The EPD has decided that the application is complete, and that the permit should be modified as requested. State and federal regulations require that the public be afforded an opportunity to review the draft permit and supporting materials and offer comments before we make our final decision. For these reasons we have enclosed a copy of the public notice which will appear in the *Tribune and Georgian* on August 7, 1998. The public comment period will begin on that day and end on September 25, 1998. The draft permit and supporting materials will be available for public review at the following locations:

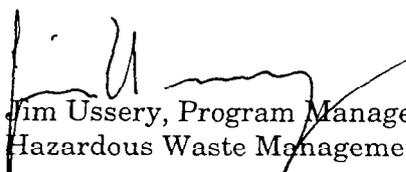
Department of Natural Resources
Environmental Protection Division
205 Butler Street, SE, Suite 1154
Atlanta, Georgia 30334

St. Marys Public Library
101 Herb Bauer Dr.
St. Marys, Georgia 31547

A public hearing will be held on September 24, 1998, at 5:00 p.m. at the St. Marys Public Library in St. Marys. The public hearing will provide a forum for receipt of oral and written comments on the draft permit.

If you have any questions regarding the public participation process or wish to make a comment on behalf of the City of Kingsland, please contact Billy Hendricks at (404) 656-2833.

Sincerely,


Jim Ussery, Program Manager
Hazardous Waste Management Branch

Enclosure

FILE: NSB - 1998 Mod (Y)
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EPD PUBLIC ADVISORY
HAZARDOUS WASTE MANAGEMENT BRANCH

COPY

CAMDEN COUNTY

The Naval Submarine Base - Kings Bay, Georgia -- Modification of their existing hazardous waste facility permit. The forty-five (45) day public comment period is from August 7, 1998 through September 25, 1998. A public hearing has been scheduled for 5:00 p.m. on September 24, 1998 at the St. Marys Public Library.

FACT SHEET
Naval Submarine Base - Kings Bay
Kings Bay, Georgia

A draft permit has been prepared to modify Hazardous Waste Facility Permit No. HW-014(S&T)-2, for the Naval Submarine Base, Kings Bay. This fact sheet has been prepared in accordance with Georgia's Rules for Hazardous Waste Management, Section 391-3-11-.11(5)(h) in order to advise the public of the principal facts and the significant legal, methodological, and policy questions considered in preparing the draft permit.

I. PERMIT PROCESS

The purpose of the permitting process is to afford the Environmental Protection Division (EPD), interested citizens, and other governmental agencies the opportunity to evaluate the ability of the Naval Submarine Base, Kings Bay, (the "Permittee") to comply with the applicable hazardous waste management requirements promulgated under Georgia Hazardous Waste Management Act. The permit conditions are set forth in one concise document which describes all the applicable requirements with which the Permittee must comply for the permit's duration.

II. PROCEDURES FOR REACHING A FINAL DECISION

The hazardous waste permit for the Naval Submarine Base will be administered by EPD. EPD has rules which require a permit to be issued for all facilities which treat, store, or dispose of hazardous waste.

The State of Georgia received final authorization for the 1984 amendments to the Resource Conservation and Recovery Act (RCRA), as amended, on September 18, 1986. Therefore, upon issuance, this permit will constitute a full RCRA permit as required by the Georgia Hazardous Waste Management Act and RCRA.

Georgia's Rules for Hazardous Waste Management, Section 391-3-11-.11 (40 CFR 124.10), require that the public be given a forty-five (45) day comment period for each draft permit prepared. The comment period will begin on the day of publication of the public notice in a major local newspaper of general circulation. Any person interested in commenting on the draft permit amendment must do so within the forty-five (45) day comment period. All comments should be submitted in writing to EPD at 205 Butler Street, SE, Suite 1154, Atlanta, Georgia 30334, Attention: Jim Ussery, Hazardous Waste Management Branch.

When the Director of EPD makes his final decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit issuance decision. The permit is effective immediately upon

issuance, but may be appealed for a period of thirty (30) days after the date of issuance.

The contact person for the Naval Submarine Base Draft Hazardous Waste Facility Permit issuance is:

Billy Hendricks
Hazardous Waste Management Branch
Georgia Environmental Protection Division
205 Butler Street, SE, Suite 1154
Atlanta, Georgia 30334
(404) 656-2833.

COPY

III. FACILITY DESCRIPTION

The Naval Submarine Base, Kings Bay, Georgia, or "Subbase," is the home port for the U.S. Navy's Fleet Ballistic Missile submarines in the Atlantic theater of operation. These are said to be Trident submarines because of the missiles they carry, the Trident D-5, but are more properly known as Ohio-class submarines. Maintenance and refit of these submarines, and contract maintenance for naval surface ships and attack submarines, is undertaken here. The fleet now comprises eighteen of these Ohio-class ships, ten of which are home-ported at Subbase.

Subbase is the permit holder; the permit allows storage in containers of 59,840 gallons of hazardous waste, corrective action for solid waste management units (SWMUs), and treatment of waste energetics by open burning and open detonation. The permitted storage unit is operated by J. A. Jones Co., the Base Operating Systems, or BOS, contractor.

Hazardous waste activities at the base include generation of waste paint, paint chips, and other paint related materials from the maintenance of interior and exterior surfaces of submarines; maintenance of ships' systems; and maintenance of base operations. The majority of these wastes are generated by the Trident Refit Facility, which is tasked with the majority of the maintenance work done aboard Subbase. Other operations at Subbase which generate wastes include the Strategic Weapons Facility, Atlantic or SWFLANT, which has the responsibility for maintaining the Trident ballistic missiles, their warheads, and associated systems; the Trident Training Facility, which has the responsibility for training ships' crews; and Subbase itself, which maintains all of the land side assets of the naval operation here. Submarine Group Ten, the command structure for the ships themselves, generates only minor amounts of waste.

The facility first submitted a RCRA Part B application in April 1984 and was issued EPA Identification number GA4170090001. They were granted Hazardous Waste

Facility Permit Number HW-014(S) in 1984, for storage 68,200 gallons of a variety of hazardous waste in containers. This Permit was revoked and reissued September 29, 1989, incorporating a new storage building and other improvements. The Permit was most recently modified in September 1996 to reduce the amount of storage to 59,840 gallons in containers, to incorporate corrective action for solid waste management units and other releases, and to add treatment by open burning and open detonation.

Because of the variety of process operations at the Naval Sub Base, the universe of hazardous wastes generated is quite broad. Its Part A Application includes most types of hazardous wastes. Most of this is waste paint and paint-related materials, oils and fuels intrinsically hazardous or being handled as hazardous, and corrosive wastes such as batteries. The current permit does not allow the disposal of any additional hazardous wastes at the facility.

IV. PERMIT ORGANIZATION

COPY

The permit is divided into seven sections. A cover sheet sets forth the basic legal authority for issuing the permit and summarizes its conditions. Section I specifies the standard conditions which are applicable to all hazardous waste management facilities. Section II addresses storage of hazardous waste in containers. Section III addresses treatment by open burning and open detonation of waste munitions. Section IV sets forth the Groundwater Protection Standard which must be met at the largest of the solid waste management units at the base, the Old Camden County Landfill. Section V imposes corrective action for releases from solid waste management units and other releases.

PUBLIC NOTICE
NOTICE OF PUBLIC HEARING

The Environmental Protection Division (EPD) of the Georgia Department of Natural Resources, under the authority of the Georgia Hazardous Waste Management Act, O.C.G.A. Section 12-8-60, *et seq.*, as amended, announces its intent to issue a modified Hazardous Waste Facility Permit, to be numbered HW-014(S & T)(2) to the Naval Submarine Base, Kings Bay, Georgia 31547, ID.Number GA4170090001.

The Naval Submarine Base, Kings Bay generates large quantities of hazardous wastes from its various maintenance activities. The facility also treats waste munitions by open burning and open detonation. On September 29, 1989, the EPD issued Hazardous Waste Facility Permit No. HW-014(S)(2) to Subbase for the storage of 68,200 gallons of hazardous waste (later amended to 59,840 gallons) in a permitted storage area. This permit included provisions for corrective action for prior and continuing ~~releases~~ (historical contamination) from the facility. The base on April 23, 1998, submitted a two-part request to modify its permit. First, the base has completed a Corrective Action Plan for the largest area of historical contamination, the Old Camden County Landfill. This plan provides for treatment in place of some contamination, and pumping and treatment of contaminated groundwater, including contamination which has left the base property. The second part of the request involves an increase in the amount of waste munitions treated, and installation of a soil and groundwater monitoring system for the waste munitions treatment area. The EPD has decided that the application is complete, and that the requested modification should be granted.

A draft permit, prepared in accordance with the provisions of the Georgia Rules for Hazardous Waste Management, Chapter 391-3-11, contains the conditions Subbase must follow to continue its treatment and storage of hazardous wastes, and for investigating and cleaning up past, present, and future contamination. The draft permit does not allow any disposal of hazardous wastes at the site.

Before making a final decision to issue the permit, Section 391-3-11-.11 (40 CFR §124.10) of the Rules requires EPD to provide an opportunity for public comment. Accordingly, a public comment period extends from August 7, 1998 to September 25, 1998. During the public comment period, a copy of the draft permit and supporting documents will be available for public review at:

Georgia Environmental Protection Division
Hazardous Waste Management Branch
205 Butler Street, S.E., Suite 1154
Atlanta, Georgia 30334
Monday - Friday 8:30 a.m. to 4:00 p.m.
(404) 656-2833

St. Marys Public Library
101 Herb Bauer Dr.
St. Marys, Georgia 31549
Call library for hours
(912) 882-4800

The EPD invites comments to be made in writing during the public comment period. A public hearing will be held on Thursday, September 24, 1998 at 5:00 p.m. at the meeting room of the St. Marys Public Library. The public hearing will provide a forum for receipt of oral and written comments.

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