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NS MAYPORT  
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PERMIT FOR U S NAVY TO OPERATE A HAZARDOUS WASTE STORAGE FACILITY IN NS  
MAYPORT FL  
7/26/1983  
U S EPA REGION IV



# Permit

U.S.Navy  
Mayport Naval Station  
Mayport, Florida

I.D. Number FL9170024260  
Permit Number FL9170024260

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to U.S. Navy (hereafter called the Permittee), to operate a hazardous waste storage facility located in Mayport, Duval County, Florida, on Old Mayport Road, at latitude N 30°23'34" and longitude W 81°25'6". The facility shall be a roofed and fenced building with a maximum capacity of 264-55 or 85 gallon drums holding no more than 14,520 gallons of hazardous waste.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit. (See 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated August 17, 1982, as modified by subsequent amendments dated December 1, 1983, March 4, 1983, April 12, 1983, and April 25, 1983, (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §§270.41, 270.42 and 270.43) and potential enforcement action. The Permittee must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of July 26, 1983, and shall remain in effect until July 26, 1993, unless revoked and re-issued, or terminated (40 CFR §270.41 and .43) or continued in accordance with §270.51(a).

July 26, 1983  
Date Signed

Charles R. Jeter  
Regional Administrator

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## SECTION I - STANDARD CONDITIONS

### I.A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Sections 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 et seq., commonly known as CERCLA), or any other law providing for protection of public health or the environment.

### I.B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR §§270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

### I.C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

### I.D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than non-compliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

- I.D.2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires.
- I.D.3. Permit Expiration. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR §§270.13 - 270.15) and through no fault of the Permittee the Regional Administrator has not issued a new permit as set forth in 40 CFR §270.51.
- I.D.4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- I.D.5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.
- I.D.6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.
- I.D.7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and re-issuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.
- I.D.8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:
- (a) Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- (d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

I.D.9. Monitoring and Records.

- (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, Standard Methods of Wastewater Analysis 14th Edition, or an equivalent method as specified in the attached Waste Analysis Plan, Attachment I.
- (b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- (c) Records of monitoring information shall specify:
  - (i) The dates, exact place, and times of sampling or measurements;
  - (ii) The individuals who performed the sampling or measurements;
  - (iii) The dates analyses were performed;
  - (iv) The individuals who performed the analyses;
  - (v) The analytical techniques or methods used; and

(vi) The results of such analyses.

I.D.10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

I.D.11. Certification of Construction or Modifications. The Permittee may not commence storage of hazardous waste at the facility until:

(a) The Permittee has submitted to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed in compliance with the permit; and

(b) (i) The Regional Administrator has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or

(ii) The Regional Administrator has either waived the inspection or has not within 15 days notified the Permittee of his or her intent to inspect.

I.D.12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

I.D.13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR §270.41(b)(2) or §270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.

I.D.14. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date. The following schedule shall apply to the Permittee:

(a) Thirty days after construction of the new facility has been completed and the Permittee becomes eligible to commence storage of hazardous waste at the new facility, interim status of the existing storage facility shall terminate and it shall no longer receive hazardous waste.

- (b) Within 180 days of permit issuance, or 15 days after termination of interim status, whichever is sooner, the Permittee shall submit to the Regional Administrator and the Florida Department of Environmental Regulation (FDER) by certified mail or hand delivery a closure plan for the interim status storage facility. The closure plan shall comply with the requirements of 40 CFR §§265.111 through 265.115 and corresponding state regulations for closure plans. Review, processing and approval of the closure plan shall be the responsibility of the Florida Department of Environmental Regulation.
- (c) Within one year of permit issuance, the Permittee shall submit to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed in compliance with the permit.

I.D.15. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

- (a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.
- (b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
  - (i) Name, address, and telephone number of the owner or operator;
  - (ii) Name, address, and telephone number of the facility;
  - (iii) Date, time, and type of incident;
  - (iv) Name and quantity of materials involved;
  - (v) The extent of injuries, if any;
  - (vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
  - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written statement shall also be provided within 15 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

I.D.16. Other Noncompliance. The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit are submitted. The reports shall contain the information listed in condition D.15.

I.D.17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.

I.E. Signatory Requirements. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR §270.11.

I.F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR §270.12.

I.G. Documents To Be Maintained at Facility Site. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

1. Waste analysis plan as required by 40 CFR §264.13 and this permit.
2. Personnel training documents and records as required by 40 CFR §264.16(d) and this permit.
3. Contingency plan as required by 40 CFR §264.53(a) and this permit.
4. Closure plan as required by 40 CFR §264.112(a) and this permit.
5. Operating record as required by 40 CFR §264.73 and this permit.
6. Inspection schedules as required by 40 CFR §264.15(b) and this permit.

## SECTION II - GENERAL FACILITY CONDITIONS

- II.A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.
- II.B. Required Notice. The Permittee shall comply with 40 CFR §264.12(c) before transferring ownership or operation of this facility.
- II.C. General Waste Analysis. The Permittee shall follow the procedures described in the Waste Analysis Plan, pages 35-44, Section C of the application, attached hereto and incorporated herein as Attachment I.
- II.D. Security.
1. The Permittee shall comply with the Security provisions of 40 CFR §264.14(b)(2) and (c) in the attached Security Plan, Section F-1 of the application, attached hereto and incorporated herein as Attachment II.
  2. The Permittee shall maintain a minimum of two warning signs, reading "Danger - Unauthorized Personnel Keep Out," on each of the four sides of the hazardous waste storage building so that at least one sign will be legible from a distance of at least 25 feet from any approach.
- II.E. General Inspection Requirements.
1. The Permittee shall follow the Inspection Schedule, Section F-2 and Table F-1, of the application, attached hereto and incorporated herein, as Attachment III, except that the fire blankets shall be inspected monthly for availability and either the telephone or the two-way radio (whichever is used in the hazardous waste storage building) shall be inspected daily for operational readiness.
  2. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR §264.15(c).
  3. Records of inspections shall be kept as required by 40 CFR §264.15(d).
- II.F. Personnel Training.
1. The Permittee shall conduct personnel training as required by 40 CFR §264.16. This training program shall follow the Outline of Training Program, Section H of the application, attached hereto and incorporated herein as Attachment IV,

and at a minimum, must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.

2. The Permittee shall maintain documentation that the training required in Condition II.F.1. has been given to, and completed by, facility personnel, and shall otherwise maintain training documents and records as required by 40 CFR §264.16(d) and (e).

II.G. General Requirements for Ignitable, Reactive, or Incompatible Waste.

1. The Permittee shall comply with the requirements of 40 CFR §264.17(a).
2. As required by 40 CFR §264.17(a), warning signs will be placed as specified in Attachment II, Section F-1.

II.H. Location Standards. The Permittee shall comply with the requirements of 40 CFR §264.18(b). This floodplain standard will be met by following the Flood Plan, Section B, Subpart B-3(c) of the application, attached hereto and incorporated herein, as Attachment V. The Detailed Flood Evacuation Plan, which is a part of the Contingency Plan, Attachment VII shall also be followed.

II.I. Preparedness and Prevention

1. Required Equipment. The Permittee shall comply with 40 CFR §264.32.
  - a. At a minimum, the Permittee shall equip the facility with the equipment set forth in the Contingency Plan, Attachment VII and in the Preventative Procedures, Structure, and Equipment Plan, Section F, Subpart F-4 of the application, attached hereto and incorporated herein, as Attachment VI.
  - b. The Permittee shall equip the hazardous waste storage facility with either a telephone or a hand-held two-way radio capable of summoning emergency assistance, as required by 40 CFR §264.32(b).
2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency as specified in the Inspection Schedule, Attachment III, and as required by 40 CFR §264.33.

3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR §264.34.
4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR §264.35. Aisle space shall be maintained as set forth on page 52 of Attachment XI.
5. Arrangements with Local Authorities.
  - a. The Permittee shall attempt to make or maintain arrangements with State and local authorities regarding the existing hazardous storage area, as required by 40 CFR §264.37.
  - b. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.
  - c. Prior to placing hazardous material in the new facility, the Permittee shall revise the arrangements made pursuant to Condition II.E.5.a. and shall, at a minimum, submit the revised Contingency Plan, Attachment VII, to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service, as required by 40 CFR §264.53(b).

## II.J. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the Contingency Plan, Section G of the application, attached hereto, and incorporated herein as Attachment VII, and follow the emergency procedures described by 40 CFR §264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.
2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR §264.53.
3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the Contingency Plan, as required by 40 CFR §264.54.
4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR §264.55, concerning the emergency coordinator as specified in Section G-2 of the Contingency Plan, Attachment VII.

II.K. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR §264.73(a), (b)(1), (2), (3), (4), (5), and (6).
2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR §264.75.
3. Availability, Retention, and Disposition of Records. The Permittee shall comply with 40 CFR §264.74.

II.L. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR §264.111 and in accordance with the Closure Plan, Section I of the application, attached hereto and incorporated herein as Attachment VIII.
2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR §264.112(b) whenever necessary.
3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure in accordance with 40 CFR §264.112(c).
4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment VIII and 40 CFR §264.113. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment VIII and 40 CFR §264.113.
5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate [and/or] dispose of all facility equipment as required by 40 CFR §264.114 and the closure plan, Attachment VIII.
6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR §264.115.

SECTION III - STORAGE IN CONTAINERS

III.A. Waste Identification.

1. The Permittee may store the following on-site generated wastes in containers at the facility, subject to the terms of this permit:

F001, F002, F003, F004, F005, F007, F009,  
D001, D002, D004, D007, D008, D009, D011,  
U002, U012, U112, U159, U210, U220, U226,  
U228, U239.

2. The maximum volume of hazardous waste stored is not to exceed 14,520 gallons in containers of 1 to 85 gallon capacity, keeping incompatible wastes separate and dedicating at least one bay each for "flammables" and "acids," respectively. All containers shall be U.S. Department of Transportation type approved for the hazardous waste stored.
3. The containers will be stored at the location noted in Figure B-8 and Figure B-5 of the application, attached hereto and incorporated herein as Attachments IX and X, respectively, in accordance with the container management practices contained in Section D of the application, Process Information, attached hereto and incorporated herein as Attachment XI.

III.B. Condition of Containers. As required by 40 CFR §264.171, if a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the the conditions of this permit.

III.C. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR §264.172.

III.D. Management of Containers. The Permittee shall manage containers as required by 40 CFR §264.173.

III.E. Containment. The Permittee shall construct and maintain the containment system in accordance with the requirements of 40 CFR §264.175 as specified in the plans and specifications in Attachment XI, except that expansion cracks in the floor pad of the hazardous waste storage facility shall be sealed with an acid and solvent resistant material.

III.F. Special Requirements for Ignitable, Reactive or Incompatible Waste. The Permittee must prevent the accidental ignition or reaction of ignitable and/or reactive wastes.

1. As required by 40 CFR §264.176, the Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.
2. Prior to placing incompatible wastes or incompatible wastes and materials in the same container, the Permittee shall comply with 40 CFR §264.17(b) as specified in Attachment XI.
3. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.
4. As required by 40 CFR §264.177(c), the Permittee shall separate containers of incompatible wastes as indicated in the attached plans, Attachment XI, and also Section F-5 of the application, which is attached hereto and incorporated herein as Attachment XII.
5. The Permittee must document compliance with III.F. (2) and (3) as required by 40 CFR §264.17(c) and place this documentation in the operating record (condition II.K.1).
6. The Permittee shall manage containers of ignitable and reactive wastes in accordance with Attachment XII.



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# Permit

U.S.Navy  
Mayport Naval Station  
Mayport, Florida

I.D. Number: FL9170024260  
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- I.D.2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires.
- I.D.3. Permit Expiration. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR §§270.13 - 270.15) and through no fault of the Permittee the Regional Administrator has not issued a new permit as set forth in 40 CFR §270.51.
- I.D.4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- I.D.5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.
- I.D.6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.
- I.D.7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and re-issuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.
- I.D.8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:
- (a) Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- (d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

I.D.9. Monitoring and Records.

- (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, Standard Methods of Wastewater Analysis 14th Edition, or an equivalent method as specified in the attached Waste Analysis Plan, Attachment I.
- (b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- (c) Records of monitoring information shall specify:
  - (i) The dates, exact place, and times of sampling or measurements;
  - (ii) The individuals who performed the sampling or measurements;
  - (iii) The dates analyses were performed;
  - (iv) The individuals who performed the analyses;
  - (v) The analytical techniques or methods used; and

(vi) The results of such analyses.

I.D.10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

I.D.11. Certification of Construction or Modifications. The Permittee may not commence storage of hazardous waste at the facility until:

- (a) The Permittee has submitted to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed in compliance with the permit; and
- (b) (i) The Regional Administrator has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or  
  
(ii) The Regional Administrator has either waived the inspection or has not within 15 days notified the Permittee of his or her intent to inspect.

I.D.12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

I.D.13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR §270.41(b)(2) or §270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.

I.D.14. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date. The following schedule shall apply to the Permittee:

- (a) Thirty days after construction of the new facility has been completed and the Permittee becomes eligible to commence storage of hazardous waste at the new facility, interim status of the existing storage facility shall terminate and it shall no longer receive hazardous waste.

- (b) Within 180 days of permit issuance, or 15 days after termination of interim status, whichever is sooner, the Permittee shall submit to the Regional Administrator and the Florida Department of Environmental Regulation (FDER) by certified mail or hand delivery a closure plan for the interim status storage facility. The closure plan shall comply with the requirements of 40 CFR §§265.111 through 265.115 and corresponding state regulations for closure plans. Review, processing and approval of the closure plan shall be the responsibility of the Florida Department of Environmental Regulation.
- (c) Within one year of permit issuance, the Permittee shall submit to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed in compliance with the permit.

I.D.15. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

- (a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.
- (b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
  - (i) Name, address, and telephone number of the owner or operator;
  - (ii) Name, address, and telephone number of the facility;
  - (iii) Date, time, and type of incident;
  - (iv) Name and quantity of materials involved;
  - (v) The extent of injuries, if any;
  - (vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
  - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written statement shall also be provided within 15 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

I.D.16. Other Noncompliance. The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit are submitted. The reports shall contain the information listed in condition D.15.

I.D.17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.

I.E. Signatory Requirements. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR §270.11.

I.F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR §270.12.

I.G. Documents To Be Maintained at Facility Site. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

1. Waste analysis plan as required by 40 CFR §264.13 and this permit.
2. Personnel training documents and records as required by 40 CFR §264.16(d) and this permit.
3. Contingency plan as required by 40 CFR §264.53(a) and this permit.
4. Closure plan as required by 40 CFR §264.112(a) and this permit.
5. Operating record as required by 40 CFR §264.73 and this permit.
6. Inspection schedules as required by 40 CFR §264.15(b) and this permit.

## SECTION II - GENERAL FACILITY CONDITIONS

- II.A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.
- II.B. Required Notice. The Permittee shall comply with 40 CFR §264.12(c) before transferring ownership or operation of this facility.
- II.C. General Waste Analysis. The Permittee shall follow the procedures described in the Waste Analysis Plan, pages 35-44, Section C of the application, attached hereto and incorporated herein as Attachment I.
- II.D. Security.
1. The Permittee shall comply with the Security provisions of 40 CFR §264.14(b)(2) and (c) in the attached Security Plan, Section F-1 of the application, attached hereto and incorporated herein as Attachment II.
  2. The Permittee shall maintain a minimum of two warning signs, reading: "Danger - Unauthorized Personnel Keep Out," on each of the four sides of the hazardous waste storage building so that at least one sign will be legible from a distance of at least 25 feet from any approach.
- II.E. General Inspection Requirements.
1. The Permittee shall follow the Inspection Schedule, Section F-2 and Table F-1, of the application, attached hereto and incorporated herein, as Attachment III, except that the fire blankets shall be inspected monthly for availability and either the telephone or the two-way radio (whichever is used in the hazardous waste storage building) shall be inspected daily for operational readiness.
  2. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR §264.15(c).
  3. Records of inspections shall be kept as required by 40 CFR §264.15(d).
- II.F. Personnel Training.
1. The Permittee shall conduct personnel training as required by 40 CFR §264.16. This training program shall follow the Outline of Training Program, Section H of the application, attached hereto and incorporated herein as Attachment IV,

and at a minimum, must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.

2. The Permittee shall maintain documentation that the training required in Condition II.F.1. has been given to, and completed by, facility personnel, and shall otherwise maintain training documents and records as required by 40 CFR §264.16(d) and (e).

II.G. General Requirements for Ignitable, Reactive, or Incompatible Waste.

1. The Permittee shall comply with the requirements of 40 CFR §264.17(a).
2. As required by 40 CFR §264.17(a), warning signs will be placed as specified in Attachment II, Section F-1.

II.H. Location Standards. The Permittee shall comply with the requirements of 40 CFR §264.18(b). This floodplain standard will be met by following the Flood Plan, Section B, Subpart B-3(c) of the application, attached hereto and incorporated herein, as Attachment V. The Detailed Flood Evacuation Plan, which is a part of the Contingency Plan, Attachment VII shall also be followed.

II.I. Preparedness and Prevention

1. Required Equipment. The Permittee shall comply with 40 CFR §264.32.
  - a. At a minimum, the Permittee shall equip the facility with the equipment set forth in the Contingency Plan, Attachment VII and in the Preventative Procedures, Structure, and Equipment Plan, Section F, Subpart F-4 of the application, attached hereto and incorporated herein, as Attachment VI.
  - b. The Permittee shall equip the hazardous waste storage facility with either a telephone or a hand-held two-way radio capable of summoning emergency assistance, as required by 40 CFR §264.32(b).
2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency as specified in the Inspection Schedule, Attachment III, and as required by 40 CFR §264.33.

3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR §264.34.
4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR §264.35. Aisle space shall be maintained as set forth on page 52 of Attachment XI.
5. Arrangements with Local Authorities.
  - a. The Permittee shall attempt to make or maintain arrangements with State and local authorities regarding the existing hazardous storage area, as required by 40 CFR §264.37.
  - b. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.
  - c. Prior to placing hazardous material in the new facility, the Permittee shall revise the arrangements made pursuant to Condition II.E.5.a. and shall, at a minimum, submit the revised Contingency Plan, Attachment VII, to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service, as required by 40 CFR §264.53(b).

#### II.J. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the Contingency Plan, Section G of the application, attached hereto, and incorporated herein as Attachment VII, and follow the emergency procedures described by 40 CFR §264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.
2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR §264.53.
3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the Contingency Plan, as required by 40 CFR §264.54.
4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR §264.55, concerning the emergency coordinator as specified in Section G-2 of the Contingency Plan, Attachment VII.

## II.K. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR §264.73(a), (b)(1), (2), (3), (4), (5), and (6).
2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR §264.75.
3. Availability, Retention, and Disposition of Records. The Permittee shall comply with 40 CFR §264.74.

## II.L. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR §264.111 and in accordance with the Closure Plan, Section I of the application, attached hereto and incorporated herein as Attachment VIII.
2. Amendmen. to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR §264.112(b) whenever necessary.
3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure in accordance with 40 CFR §264.112(c).
4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment VIII and 40 CFR §264.113. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment VIII and 40 CFR §264.113.
5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate [and/or] dispose of all facility equipment as required by 40 CFR §264.114 and the closure plan, Attachment VIII.
6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR §264.115.

SECTION III - STORAGE IN CONTAINERS

III.A. Waste Identification.

1. The Permittee may store the following on-site generated wastes in containers at the facility, subject to the terms of this permit:

F001, F002, F003, F004, F005, F007, F009,  
D001, D002, D004, D007, D008, D009, D011,  
U002, U012, U112, U159, U210, U220, U226,  
U228, U239.

2. The maximum volume of hazardous waste stored is not to exceed 14,520 gallons in containers of 1 to 85 gallon capacity, keeping incompatible wastes separate and dedicating at least one bay each for "flammables" and "acids," respectively. All containers shall be U.S. Department of Transportation type approved for the hazardous waste stored.
3. The containers will be stored at the location noted in Figure B-8 and Figure B-5 of the application, attached hereto and incorporated herein as Attachments IX and X, respectively, in accordance with the container management practices contained in Section D of the application, Process Information, attached hereto and incorporated herein as Attachment XI.

III.B. Condition of Containers. As required by 40 CFR §264.171, if a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the the conditions of this permit.

III.C. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR §264.172.

III.D. Management of Containers. The Permittee shall manage containers as required by 40 CFR §264.173.

III.E. Containment. The Permittee shall construct and maintain the containment system in accordance with the requirements of 40 CFR §264.175 as specified in the plans and specifications in Attachment XI, except that expansion cracks in the floor pad of the hazardous waste storage facility shall be sealed with an acid and solvent resistant material.

III.F. Special Requirements for Ignitable, Reactive or Incompatible Waste. The Permittee must prevent the accidental ignition or reaction of ignitable and/or reactive wastes.

1. As required by 40 CFR §264.176, the Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.
2. Prior to placing incompatible wastes or incompatible wastes and materials in the same container, the Permittee shall comply with 40 CFR §264.17(b) as specified in Attachment XI.
3. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.
4. As required by 40 CFR §264.177(c), the Permittee shall separate containers of incompatible wastes as indicated in the attached plans, Attachment XI, and also Section F-5 of the application, which is attached hereto and incorporated herein as Attachment XII.
5. The Permittee must document compliance with III.F. (2) and (3) as required by 40 CFR §264.17(c) and place this documentation in the operating record. (condition II.K.1).
6. The Permittee shall manage containers of ignitable and reactive wastes in accordance with Attachment XII.

C-2 Waste Analysis Plan

(a) Parameters and rationale:

Table C-3 is a list of hazardous wastes stored at the facility with the analytical protocol for each. There is no plan for unused materials in unopened containers to be laboratory tested unless container markings have been destroyed. The characteristics of these materials are known from the HMIS microfiche files. The plan does specify analysis for partially used materials to establish whether the material in a container is represented by the container markings.

(b) Test Methods and Frequency of Analyses

Table C-4 identifies the test methods to be employed in the analysis plan. The frequency of analysis is indicated in Table C-5. All test methods with an asterisk are from EPA Publication SW-846 (Reference 1) or 40 CFR 261, Appendix II.

Since unused and partially used materials are generated at unpredictable frequencies, the waste analysis plan specifies "as generated" for these types of wastes.

Date: 11/30/82  
 Revision No.: 1  
 Section C

TABLE C-3  
 WASTE ANALYSIS PROTOCOL

<u>WASTE</u>	<u>PARAMETER(s)</u>	<u>COMMENTS</u>
Acetic acid, Conc.	pH	Has a pH less than 2 and is corrosive
Acetic acid, glacial	pH	Has a pH less than 2 and is corrosive
Acetone	acetone flash point	This is a listed waste due to its flash point (0°F) and is ignitable. (U002)
Adhesive, lagging	flash point	Has a flash point of 80°F and is ignitable
Adhesives, other	flash point	Have flash points ranging from 60°F to 120°F and are ignitable
Alodine	EP Toxicity (Cr) pH	Material contains chromic acid and is corrosive. Waste contains toxic levels of chromium.
Ammonia	pH	Solution has pH >12.5 and is corrosive.
Aniline	aniline	Material is a listed waste for toxicity and ignitability (hr) flash point is 158°F), (U012).
Battery acid	pH	Solution has pH less than 2.0 and is corrosive.
Boiler passivator	EP Toxicity (Pb) pH	May contain lead. This is oxalic acid. pH is 2.0 and the waste is corrosive.
Chromium plating solution	EP Toxicity (Cr) cyanide	This is a listed waste (F007) and is listed for reactivity and toxicity. Contains cyanide and chromium. Mayport's solution w not release cyanide at pH's between 2.0 and 12.5.

TABLE C-3 (continued)

WASTE ANALYSIS PROTOCOL

<u>WASTE</u>	<u>PARAMETER(s)</u>	<u>COMMENTS</u>
Cleaning solvents	flash point xylene toluene methyl ethyl ketone	These paint cleaners have flash points between 0°F and 110°F are ignitable. They may contain the listed wastes (F003) xy toluene, or methyl ethyl ketone.
Cleaning/degreasing cmpds.	trichloroethane trichlorotrifluoroethane	Degreasing and metal cleaning compounds contain either trich ethane or freon and are listed hazardous wastes (F001).
Copper Acetoarsenite	EP Toxicity - As	This material contains arsenic and is toxic.
Descaling compound	pH	This material is corrosive.
Disodium phosphate	pH	This material has a pH less than 2.0 and is corrosive.
Etching solution	cyanide pH	Etching solutions may contain cyanide and be hazardous based listing F009. They may also have pH below 2.0 and be corrosive.
Ethyl acetate	ethyl acetate flash point	This is a listed waste (U112) for ignitability. Flash point is 24°F.
Ethyl butanol	flash point	Material has a flash point of 135°F and is an ignitable liquid.
Developers (film) and Fixers	EP Toxicity - Ag	Film developing and fixing chemicals contain silver and are

TABLE C-3 (continued)

WASTE ANALYSIS PROTOCOL

WASTE	PARAMETER(s)	COMMENTS
Formic acid	pH	Material has a pH less than 2.0 and is corrosive.
Methyl ethyl ketone	Flash point MEK	Material is a listed waste for toxicity and has a flash point of 22°F. (F005/U159)
Naptha	flash point	Naptha has a flash point of 107°F and is ignitable.
Nickel plating solution	pH EP Toxicity cyanide	Nickel plating solutions have pH's below 2 and are corrosive. (F007)
Paint remover	pH/corrosivity	Paint removing (stripping) compounds are acidic with pH's below (D002/F004)
Paints	flash point	Most paint materials are solvent based with flash points varying from 40°F to 140°F and are ignitable.
Sulfuric acid	pH	Sulfuric acid waste has a pH below 2.0 and is corrosive.
Tetrachloroethylene	perchloroethylene	This material (also known as tetrachloro ethylene is a listed waste (F001)/U210.
Silver plating solution	cyanide EP Toxicity - Ag	Silver plating solution The cyanide is complexed but the material is toxic with respect to silver/poll
Sodium hydroxide solution	pH	Material has a pH greater than 12.5 and is corrosive.

TABLE C-3 (continued)

WASTE ANALYSIS PROTOCOL

<u>WASTE</u>	<u>PARAMETER(s)</u>	<u>COMMENTS</u>
sodium nitrate	sodium nitrate	This material is an ignitable waste by virtue of being an oxidizer under DOT criteria.
sodium nitrate flux	sodium nitrate	Material is an ignitable hazardous waste by virtue of being an oxidizer under DOT criteria.
ulfamic acid	pH	Material has a pH below 2.0 and is corrosive.
in plating solution	pH	Material has a pH below 2 and is a corrosive waste. Solution contains chromium (depending on vendor).P007
oluene	flash point Toluene	Material is a listed waste (F003) and is ignitable. Flash point = 40°F. (U220)
richloroethane	trichloroethane	Material is a listed waste (U226, F001) for toxicity.
richloroethylene	trichloroethylene	Material is a listed waste (U228, F002) for toxicity.
richlorotrifluoroethane	Trichlorotrifluoroethane	Material is a listed waste (F001) for toxicity.
risodium phosphate	pH	Material is corrosive.
arnish	flash point	All varnishes used at Mayport have flash points below 140°F and are ignitable hazardous wastes.

TABLE C-3 (continued)

WASTE ANALYSIS PROTOCOL

<u>WASTE</u>	<u>PARAMETER(s)</u>	<u>COMMENTS</u>
xylene	flash point	Xylene has a flash point of 84°F. It is also a listed waste (F003, U239) for ignitability.
zinc plating solution	pH cyanide	Zinc plating solutions have pH's below 2.0 and are corrosive (F007)
mercuric nitrate solution	EP Toxicity - Hg	This solution is toxic for mercury (D009).
fixed paint wastes	flash point EP Toxicity - Pb, Cr	Paint wastes are toxic for lead and chromium and may be ignitable
nitric acid solution	pH	Material has a pH below 2.0 and is corrosive.
ethylene diamine tetraacetate	pH	Material has a pH below 2.0 and is corrosive.

TABLE C-4  
TEST METHODS

<u>PARAMETER</u>	<u>PROCEDURE</u>	<u>REFERENCE</u>
pH	electrometric	*Method 5.2
Flash point	Pensky-Martens closed cup test	ASTM D-93-80
EP Toxicity	EP Toxicity leachate	*Methods 7.2-7.5
Chromium	Atomic absorption	*Method 8.54
Lead	Atomic absorption	*Method 8.56
Arsenic	Atomic absorption	*Method 8.51
Silver	Atomic absorption	*Method 8.60
Mercury	Atomic absorption	*Method 8.57
Cyanide	titrimetric	*Method 8.55
Acetone	GC/PID	*Method 8.02
Aniline	GC/EC	*Method 8.09
Xylene	GC/PID	*Method 8.02
Toluene	GC/PID	*Method 8.02
Methyl ethyl ketone	GC/FID	*Method 8.02
Trichloroethane	GC/HSD	*Method 8.09
Trichloro- fluoroethane	GC/HSD	*Method 8.09
Ethyl acetate	GC/FID	*Method 8.02
Perchloroethylene	GC/HSD	*Method 8.09
Sodium nitrate	colorimetric (nitrate)	Standard Methods (Reference C-3)
Corrosivity	NACE Standard TM-01-69	*Method 5.3

TABLE C-5  
FREQUENCY OF ANALYSIS

<u>WASTE</u>	<u>ANALYSIS</u>	<u>FREQUENCY</u>
Unused and partially used material wastes	per Table C-4	as generated*
Plating solution wastes	EP Toxicity pH	annually or on process change
Paint wastes	EP Toxicity Flash point	annually or on product change
Mercuric nitrate	EP Toxicity	annually

\*Unused materials in unopened containers will not be analyzed unless outside container markings have been destroyed. Characteristics will be determined from HMIS.

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The frequency of analyses for other wastes is annually or on product change. Since the ship cleaning and repairing activities which generate these wastes do not change significantly, only a change in products used is likely to alter the wastes' characteristics. These wastes will be re-analyzed if the products change even if this occurs prior to the annual retest schedule.

(c) Sampling Methods:

All hazardous wastes are stored in containers ranging in size from 5 gallons to 85 gallons. The sampling method employed is a Coliwasa sampler (Reference 2). For all wastes except mixed paint wastes, a single sample (top to bottom) will be taken from a container. Samples from multiple containers of the same waste will be composited for analysis.

Paint waste containers are sampled with a Coliwasa and a composite sample is prepared from three grab samples at the top, middle, and bottom of the container. Samples from multiple containers of mixed paint waste are not composited.

(d) Off-Site Wastes

This facility does not receive wastes from off-site generators; therefore the requirements for wastes received from off-site do not apply.

C-3 Other Analyses

As part of its waste analysis plan, Mayport Naval Station routinely analyzes all waste streams to determine whether they meet the characteristics of hazardous waste. Attached in an Appendix to Section C are photocopies of test results on two of these waste streams. They are included due to the large quantities that are generated.

The first is waste from the polishing pond at the oily waste treatment facility. EP Toxicity and corrosivity tests on this waste were negative for hazardous waste.

The second waste analyzed was the containerized synthetic hydraulic fluid (Cell-U-Lube) currently stored near the SIMA building. Test reports on this waste are negative for hazardous waste characteristics.

References

- C-1 Department of Defense, DoD Hazardous Materials Information System, DoD Publication 6050.5-I. February, 1982 (last revision date)
- C-2 Environmental Protection Agency, Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, EPA Publication SW-846, May, 1980 (with revisions)
- C-3 APHA, Standard Methods for the Examination of Water and Waste Water, 14th ed. N. Y. (1975)

F-1 Security

(a) Security procedures and equipment:

Overall security for Mayport Naval Station is the responsibility of the station Security Officer. Security for the hazardous waste storage building is the responsibility of the Public Works Engineering Division Director (currently) and the Environmental Engineer (after 10/1/82). Access to the Naval Station is gained through one of three gates. The main gate on Maine St. (Old Mayport Road) is staffed 24 hours a day by security police. A pass issued by the station security office is required for entry onto the base. A second gate on the east side of the station on Seminole Beach Road is generally closed but continuously manned when open. The third gate is located on the northwest perimeter road and provides direct access to the Town of Mayport. This gate is routinely closed and locked. It may be used for access to the base only when authorized by the base security officer. When open, this gate is continuously manned. A base pass is required for entry.

The entire station is fenced along land boundaries. Areas facing the St. Johns River and the Atlantic Ocean are not fenced.

In addition to the gate guards, the Station Security Officer and security personnel patrol the station 24 hours a day, 7 days a week. All security personnel are equipped with radios for immediate reporting of emergencies or security problems. The entire station is connected to an internal telephone system which is also used for off-station communication.

(a)(1) Hazardous waste storage building security:

The planned hazardous waste storage building will be inside an existing (partially changed to accommodate the building) six foot chain link fence. Within this fenced area, in addition to the hazardous waste storage building, are the chemical laboratory (Bldg. 1346), and the oil waste treatment facility. Three gates will provide access to this enclosed area. The hazardous waste storage building itself is surrounded by a 10-foot high woven wire fence with two gates. (See figure B-6). These gates will be locked unless waste is being moved into or out of the building or unless the Environmental Engineer or Engineering Division Director is present. Keys to all gates to the building will be held by the Environmental Engineer, the Engineering Division Director, and the Fire Department (to provide for quick access in the event of an emergency).

The Environmental Engineer will control entry to the hazardous waste storage building.

(a)(2) Warning signs:

Signs will be posted on all four sides of the hazardous waste storage building, in a size that will be visible from a distance of 25 feet, reading "Danger--Unauthorized Personnel Keep Out.

In addition "No Smoking Within 50 Feet" signs will be placed on all four sides of the building fence so that each is visible from a distance of 50 feet. "No Smoking or Open Flame" signs will be placed in the container storage area.

(b) Waiver:

Mayport Naval Station does not request a waiver of the security requirements stated in Part 264.14(a)(1) and (2)d regarding injury to intruder and violation by intruder.

The hazardous waste storage building is near the Chemical Laboratory where an office is maintained for the Environmental Engineer. Inside the storage building voice communications are used to alert other personnel of an emergency. External communication is maintained by telephone from the Chemical Laboratory. In the event of an emergency at the storage building, the discoverer will use the Chemical Laboratory telephone to summon assistance. No personnel are permanently assigned to the building.

Water for fire fighting is provided by a fire hydrant located near the access road to the hazardous waste storage building. The Station Fire Department has 3 pumper trucks and 2 wash trucks which will be used to respond to fire emergencies.

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Decontamination is accomplished by rinsing with water which is collected in the building sumps and then pumped into drums. Chemical analysis is performed on the rinse water to determine the level of contamination. Test procedures and parameters are those specified in Section C appropriate to the type(s) of waste spilled. Rinse waters are sent off-site for disposal with other containerized wastes.

F-2 Inspection Schedules

(a) General inspection requirements:  
The hazardous waste storage building will be routinely inspected, as are all parts of the facility, for structural deterioration, unauthorized discharges, safety violations, equipment malfunctions, and security problems. These general inspections are performed by the Fire Department inspector (weekly), the Environmental Engineer (weekly), and the Safety Officer (at least quarterly).

(a)(2) Frequency of inspections:

Tables F-1 and F-2 show the frequency of inspection for each item.

(a)(3) Specific inspection requirements - containers:

All inspections shown on Table F-1 will be conducted by the Environmental Engineer and documented on the appropriate inspection log. The log sheets contain spaces for the inspector's name, date and time of inspection, and a Comments Column for recording observations, recommending repairs, and listing specific information. The inspector will be required to indicate whether any condition is acceptable or unacceptable, and to follow up on unacceptable notations with the date and nature of corrective actions. The inspection log is maintained by the Environmental Engineer and all logs are retained for at least three years.

(a)(4) Tank inspections:

Not applicable to Mayport Naval Station.

(a)(5) Waste pile inspections:

Not applicable to Mayport Naval Station.

(a)(6) Remedial action:

The Environmental Engineer and the Engineering Division Director are authorized to initiate immediate action for the correction of unacceptable conditions as determined by the inspections. If emergency maintenance is required, corrective action will be taken immediately. In the event that an emergency is noted, the inspector is required to immediately take action as specified in the Contingency Plan (Section G).

TABLE F-1

INSPECTION SCHEDULE  
HAZARDOUS WASTE STORAGE BUILDING

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<u>ITEM</u>	<u>PROBLEM</u>	<u>FREQUENCY</u>
<b>I. SAFETY AND EMERGENCY EQUIPMENT</b>		
Fire extinguishers	Need recharging	Monthly/after use
Eye wash station/shower	Adequate pressure, leaks	Weekly
Fire blankets	Present	As used
Absorbent (loose and pads)	Low or Out of stock	Monthly/after use
Submersible pump	Power, maintenance	Monthly
Recovery drums	Out of stock/integrity	Monthly
Eye/glasses/face shields	Out of stock, clean	Monthly/after use
Breathing apparatus (self-contained)	Air/valves/clean; spare cylinders	Monthly/after use
Cartridge respirators	Spent cartridge, seals	Monthly/after use
Chemical protection suit	Tears, clean	Monthly/after use
Rubber (nitrile) gloves	Out of stock, clean	Monthly/after use
Neoprene aprons	Out of stock, clean	Monthly/after use
Safety boots	Out of stock, clean	Monthly
Telephone	Power failure	Monthly
First aid kit	Completeness	Monthly/after use
<b>II. SECURITY SYSTEM</b>		
Fencing	Intact, corrosion	Weekly
Gates (2)	Locks ok, intact, corrosion	Weekly
<b>I. STRUCTURAL EQUIPMENT</b>		
Spill trenches	Leaks, spills	Weekly
Curbing	Leaks, deterioration	Weekly
Base (Foundation)	Cracks, deterioration	Weekly
Storage areas	Leaks, spills	Weekly
Ramps	Cracks, deterioration	Weekly
Portable pump	Functional, clean, power	Weekly
Loading ramps	Evidence of leaks or deterioration	Before & after use

TABLE F-1 (continued)

INSPECTION SCHEDULE  
HAZARDOUS WASTE STORAGE BUILDING

<u>ITEM</u>	<u>PROBLEM</u>	<u>FREQUENCY</u>
IV.	CONTAINER STORAGE AREA	
	Segregation plan followed	
	Segregation area signs	
	Container placement	
	Container lids	
	DOT labels	
	HW labels	
	Containers	
	Pallets	
	Warning signs	
	Incompatibles stored together	Weekly
	Proper sign	Weekly
	Aisle space, stack height	Weekly
	Lids open	Weekly
	Correct labels and markings	Weekly
	Correct information, present	Weekly
	Leaks, dents, corrosion	Weekly
	Damaged	Weekly
	Intact	Weekly

TABLE F-2

OTHER INSPECTIONS

<u>INSPECTOR</u>	<u>NATURE OF INSPECTIONS</u>	<u>FREQUENCY</u>
Safety Officer	The Mayport Naval Station Safety Officer conducts periodic inspections of all Station buildings for compliance with the OSHA and ANSI standards, as well as Navy requirements. These inspections are documented and include ventilation, safety equipment, and procedures.	At least Quarterly
Fire Inspector	The Mayport Naval Station Fire Department Fire Inspector conducts periodic inspections of all buildings for fire safety and compliance with NFPA and Navy fire safety standards. Inspector initiates changes if required.	At least Quarterly
Public Works (Maintenance)	The Public Works Maintenance staff conducts periodic inspections of all Station facilities for evidence of malfunctions, deteriorations, and needed improvements.	On-going

Mayport Naval Station's hazardous waste management plan specifies responsibilities to be met by hazardous waste generating units. The responsibilities and qualifications of designated employees in these units are detailed in two plan manuals (References H-1 and H-2) and are available on request. They are not included in this permit application due to their length (a total of 200 pages). Training is required for these employees. Names and type of training are detailed in the next subsection.

(b) Training content, frequency, and techniques:

The training program used at Mayport Naval Station was developed by the U.S. Navy. The training program is conducted in lecture and discussion style as a one-day course. The course syllabus is attached as Table H-1. The Engineering Division Director assists in this training program to ensure that information is specific to Mayport Naval Station. This training program is the "first tier" of training. Subsequent on-the-job training for personnel involved in loading/unloading hazardous wastes for the hazardous waste storage building will be conducted by the Environmental Engineer. Laborers who load and unload wastes are not assigned permanently to that task, rather they are assigned on an "as needed" basis. It is impractical to present formal instruction to these laborers (who are military employees). Therefore no waste is loaded or unloaded except under the direct and close supervision of the Public Works Engineer (currently) or the Environmental Engineer (when employed and trained). The close supervision and immediate availability provided by these employees will ensure that these functions are performed in compliance with 40 CFR 264.

TABLE H-1  
COURSE SYLLABUS

INTRODUCTION

FEDERAL, STATE AND LOCAL REGULATIONS

- A. Clean Water Act
- B. Clean Air Act
- C. Transportation Safety Act
- D. Occupational Safety and Health Act (OSHA)
- E. Toxic Substances Control Act (TSCA)
- F. Resource Conservation and Recovery Act (RCRA)
- G. Comprehensive Environmental Response, Compensation, and Liability Act (SUPERFUND)
- H. State Regulations
- I. Local Regulations

KEY ELEMENTS OF RCRA

- A. Definition of a Hazardous Waste
- B. Manifest System for Tracking Hazardous Waste from Cradle to Grave
- C. Standards for Generators and Transporters
- D. Permits for Treatment, Storage & Disposal facilities
- E. Requirements for State Programs
- F. Requirements for Waste Analysis, Facility Inspection, Personnel Training, Emergency and Contingency, and Closure Plans

NAVY DIRECTIVES AND POLICY

- A. OPNAVNOTE 6240 of 20 Feb., 1980
- B. OPNAVINST 6240.3
- C. OPNAVINST 5100.23
- D. OPNAVINST 5100.19
- E. NSTM 593
- F. Shipboard Hazardous Material/Waste Management Plan
- G. NAVSEA OP 2239

RESPONSIBILITIES

- A. Commanding Officer
- B. Supply Officer
- C. Supervisory Personnel
- D. Hazardous Material/Waste Coordinator

HM/HW IDENTIFICATION, SOURCES

- A. Definitions
- B. Shipboard Hazardous Waste Inventory
- C. HW Found in Significant Quantities
- D. Significantly Hazardous Substances
- E. Bulk Waste
- F. HMTIS
- G. Overhaul and Decommissioning
- H. PCB's
- I. NRP

- J. Ordnance Waste
- K. Consolidated Hazardous Item List
- L. Hazardous Material Information Systems (HMIS)
- M. Hazardous Material Safety Data Sheets
- N. Chemical Hazardous Response Information System (CHRIS)
- O. OHMTADS
- P. CHEMTREC + (800-424-9300)

#### FILM - HAZARDOUS MATERIAL - EMERGENCY RESPONSE (HF24-EPA)

#### COLLECTING, HANDLING AND STORAGE PROCEDURES

- A. Introduction/General
- B. Proper Collecting, Handling, Storing
- C. Waste Generation Locations
- D. Materials not to be stored aboard U.S. Naval Ships
- E. Prevention of Spills
- F. Solvents (including organic solvents)
- G. Plastics - (Problems in case of fire)
- H. Metals
- I. Significantly Toxic Metals
- J. Asbestos
- K. Safety Practices and Protective Clothing
- L. Fire Classifications

#### LABELING AND CONTAINERIZATION

- A. Department of Transportation Labels
- B. Chil Label
- C. Shipboard HW Labels
- D. Types of Containers

#### LUNCH

#### PUBLIC WORKS/SHORE RESPONSIBILITY

#### TREATMENT AND DISPOSAL

- A. Types of Treatment Systems
- B. Disposal Systems
- C. Manifest Systems (DD 1149 and 1348-1)

#### SPILL PREVENTION CONTROL AND COUNTERMEASURES (SPCC)

#### SPILL CONTINGENCY PLANNING

- A. Definition of SPCC/Spill Contingency Plan
- B. Responsibilities
- C. Objectives of Plan
- D. Spill Clean Up Materials (small scale)
- E. Spill Response Contacts
- F. Spill Response Actions (small and large scale)
- G. Knowledge of Spilled Material
- H. Booms, Skimmers, Pumps, Dredging
- I. Examples of Good vs Poor Response Actions
- J. U.S. Navy Discharge Restrictions
- K. Communications in an Emergency

Training for the Environmental Engineer and the Engineering Division Director is supplemented by seminars and conferences involving hazardous waste management and Navy training documents. Their training and that of employees in generating units is updated at least annually through attendance at the Hazardous Waste Handling Course.

All fire fighting personnel at the Station receive extensive fire fighting training equivalent to NFPA requirements and continuing training on a monthly basis. The alternate emergency coordinator will be trained during the week of 12/6-12/10/82 at a course presented by the Naval Energy and Environmental Support Activity. The course details contingency plan implementation and emergency response. The alternate will also attend the Hazardous Waste Course on 12/14/82. The primary Emergency Coordinator will be trained by the alternate.

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(c) Training Director:

The formal training courses are conducted by Navy hazardous waste specialists, assisted by the Mayport Environmental Engineer, who have been pre-selected for extensive professional experience and education in environmental control. The on-base training director will be the Environmental Engineer. The successful candidate for this position is qualified in environmental and hazardous waste controls.

(d) Relevance to job title:

Representatives of generating units receive broad training to ensure their awareness of the hazardous waste management plan and the procedures to be followed. All other personnel who may be involved in the hazardous waste storage operations are closely supervised by the Engineering Division Director (currently) and the Environmental Engineer (after 10/1/82). The Environmental Engineer and Engineering Division Director receive broadly-based instruction on a continuing basis.

(e) Training for emergency response:

The Engineering Division Director (currently) and the Environmental Engineer (when employed and trained) are primarily responsible for coordinating response to emergencies. They are responsible for personally instructing other personnel (such as loading crews) in response to emergencies.

The instruction provided includes:

Emergency communications and alarm systems;  
procedures for response to liquid spills;  
power failure response procedures;  
evacuation routes and procedures;  
response to fires and explosions; and  
decontamination procedures.

In addition there are two other types of emergency response training. Mayport Naval Station maintains a full-time 24-hour Fire Department whose employees undergo continuing training for response to fires and explosions. The Station also conducts two yearly hurricane evacuation drills for training purposes.

(f) Training in Maintenance of Facility Emergency  
Equipment:

The Public Works Department Maintenance staff is responsible for maintaining all non-shipboard equipment and structures on the Station. They are given continuing on-the-job training in the performance of their duties. Fire Department personnel are trained in the maintenance of all fire fighting equipment on a continuing basis.

The hazardous waste management system at Mayport Naval Station does not employ any automatic waste feed cut-off systems so no training is necessary on the parameters of such a system.

H-2 Implementation of the Training Program

The Engineering Division Director and representatives of generating units have been trained at the time of this submittal. The training of the Environmental Engineer will be reviewed and updated at the time of his employment. In the future, all new personnel will complete this training program within six months of assignment to the hazardous waste storage facility or within six months of their date of employment, whichever is later. No employee hired or assigned to work at this facility will work unsupervised prior to completion of the training program.

Records documenting the job title, job description, name of employee, and completed training programs are maintained on-site and retained until closure of the facility.

REFERENCES

- H-1 Navy Environmental Support Office, Navy Hazardous Materials Environmental Management Program: Guide For the Hazardous Waste Management Plan, NESO 20.2-029A, November, 1981.
- H-2 Naval Sea Systems Comman, Shipboard Hazardous Material/Waste Management Plan, August, 1981.

(c) Flood Plan:

The Naval Station will evacuate all drums of hazardous waste upon a Condition Two alert. Condition Two is a 24-hour advance warning of impending destructive weather or high water. In this event, or a 100-year flood, all drums will be loaded by forklift onto as many as three (3) flat bed trailers and transported to Jacksonville Naval Air Station (EPA I.D. Number FL6170024412) by qualified Navy personnel. In the event Jacksonville cannot provide transportation, Mayport Naval Station will request an emergency transporter's I.D. Number from the regional EPA office under the provisions of 40 CFR 263.11, 45 FR 85022, and will transport their own drums. Jacksonville NAS is a licensed storer and has capacity to receive all drums from Mayport Naval Station on an eight-hour notification. Figure B-9.1 presents the location of that 8200 square-foot facility in relation to the flood plain. The facility floor is at an

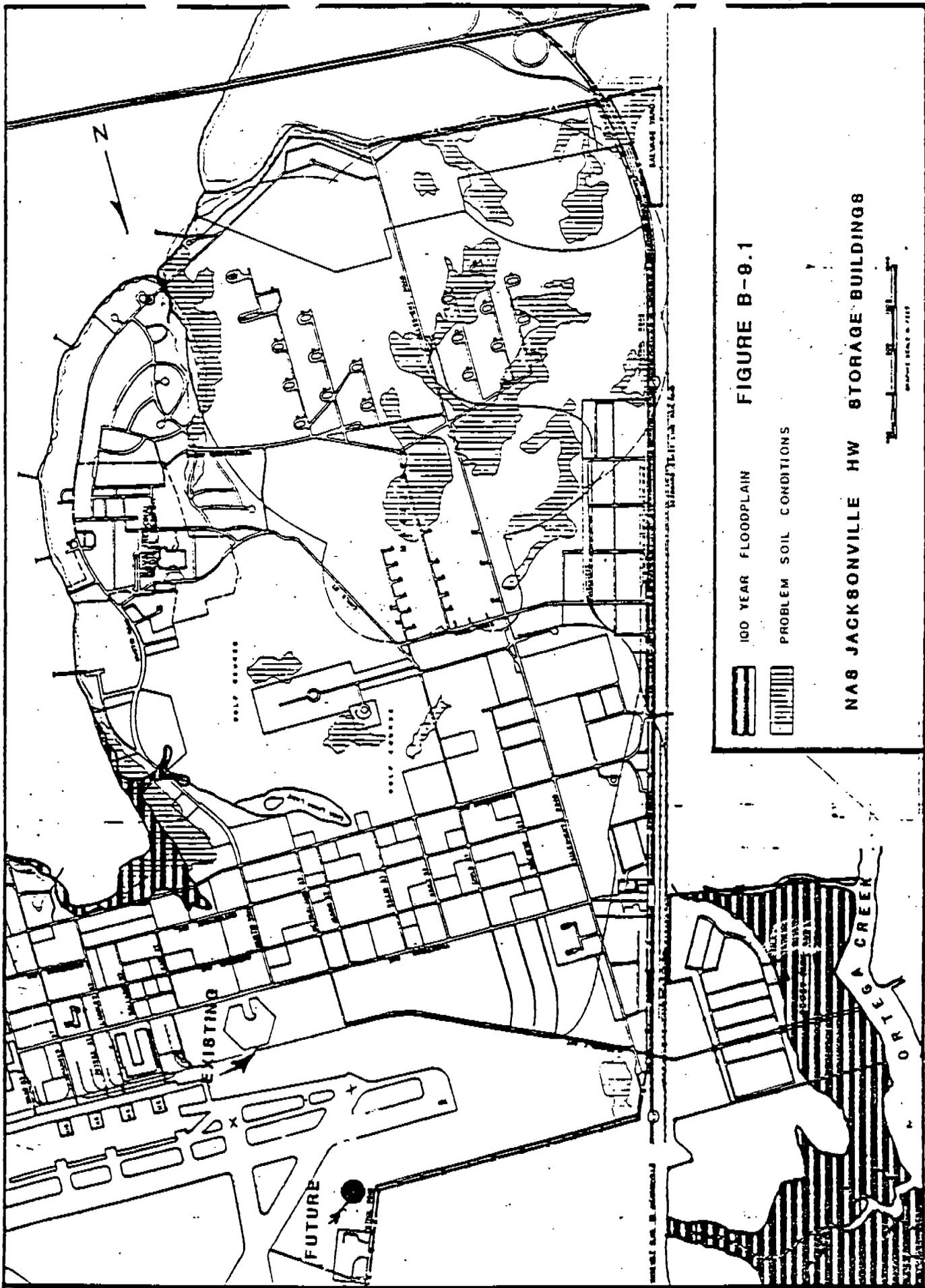


FIGURE B-9.1

100 YEAR FLOODPLAIN

PROBLEM SOIL CONDITIONS

NAS JACKSONVILLE HW STORAGE BUILDINGS

elevation above 15 feet, compared to the 100-year flood elevation of 9 feet. A copy of the agreement letter appears in Section G of this application.

It is estimated it will take 8 hours to load and transport the drums to NAS Jacksonville. If there are any unforeseen delays, there will still be ample time to move the drums to the NAS Jacksonville storage site.

Section G presents the detailed flood evacuation plan.

F-4 Preventive Procedures, Structure, and Equipment

(a) Loading/unloading operations:

Loading operations that take place at the generating source will be handled with a forklift to lift the drum and pallet onto a small truck. All drums will be securely fastened with a rope to keep them from tipping over. All drums will be sealed. In the event of a spill industrial absorbents are stored in Building 1430. All contaminated material will be placed in an approved drum, labeled, and taken to the storage area to await disposal to an approved landfill.

The storage facility has been designed with access ramps and a 19-foot wide aisle to assure easy access to the segregated storage bays. In addition, all drums are transported on pallets for safer handling. These pallets also prevent the drums from standing in liquids.

(b) Runoff:

There is no runoff from the storage facility. It is completely curbed with interior sumps to collect and hold all spills. In the event of a hurricane or 100-year flood, emergency procedures are discussed in Section B-3 and Section G. A 5-foot overhang on the building will prevent rainwater from entering and protect runoff from contamination.

(c) Water supplies:

The container storage facility is constructed of concrete with moisture barriers and totally enclosed sumps that will prevent any spills from contaminating water supplies.

(d) Equipment and Power Failure:

The only electrical equipment in the storage building are the lights. If a power failure occurs, flashlights will be used. Portable pumps require electric power also; however the spill containment system has excess capacity and can contain spills until power is restored.

(e) Personal Protection Equipment:

Hazardous waste characteristics are discussed in Section C. Protective equipment appropriate to the characteristics has been purchased. Personnel will have a fully self-contained breathing mask, acid resistant coveralls, gloves, and face shields available. Further details may be found in Section G-5, Emergency Equipment. First aid refresher courses, and annual personnel training programs will be presented to satisfy the OSHA standards of 29 CFR Part 1910 Subpart I - Personal Protective Equipment (see Section H).

SECTION G  
CONTINGENCY PLAN

This Section contains the information required by 40 CFR 122.25(a)(7), 264 Subpart D, and the flood evacuation plan required by 40 CFR 122.25(a)(11)(iv)(C). It contains the emergency response measures which Mayport Naval Station maintains. There are two levels of contingency plans at the Naval Station. The first level addresses localized spills, discharges, fires, and explosions. Localized incidents are those which do not pose a substantial risk. The second level addresses major disasters (warfare, major destructive weather, major civil disturbance, etc.). The contingency plan that follows is primarily a first level plan and relates specifically to operations related to hazardous waste storage.

However, flooding of the hazardous waste storage building through excessive rainfall, high water or hurricane is considered a major disaster. Therefore evacuation of hazardous waste is a part of the Primary Disaster Preparedness Plan. Annex H of that plan (destructive weather) is referenced in this Section. The entire plan is more than 300 pages long and is not attached because of its length. The plan is available on request.

G-1 General Information

This contingency plan is for Mayport Naval Station, Old Mayport Road, Mayport, Florida. The Naval Station is home port to portions of the U.S. Navy Atlantic Fleet and one rotary-wing squadron. Primary activity of the Station is the supply and repair of Naval ships. For water pollution

contingency planning, Mayport Naval Station is in sub-area BRAVO-THREE of CNO AREA REPRESENTATIVE, COMNAVBASE CHASN. If contact with Mayport Naval Station cannot be established, contact COMSEABASEDASWWINGSLANT at (904) 772-2114/2338/2340 (commercial) or 942-2114/2338/2340 (autovon).

On the station, the following may be contacted in the event of an emergency: Engineering Division Director, J. S. Veal, (904) 246-5207 from 7:30am to 4:00pm weekdays; the Station Fire Department (904) 246-5333 (24 hours); and Station Security Office (904) 246-5583 (24 hours).

Mayport Naval Station stores hazardous waste at one location: a container storage building which will contain a maximum of 264 drums of hazardous waste. A general Station map showing the location of the building is in Section B. A description of the wastes stored is contained in Section C. These Sections are attached as Appendices (in copies distributed to emergency response organizations).

#### G-2 Emergency Coordinators

In an emergency, contact the Emergency Coordinators listed on the following page (primary first, then alternate). The listed individuals have the authority to commit the necessary resources of the Station and have been trained in emergency response. Their authority to commit the resources of the Station is delegated from the Public Works Officer.

PRIMARY  
J. S. Veal  
Engineering Division Director  
(904) 246-5207 (Office)  
(904) 285-6586 (Home)  
541 Ponte Vedra Blvd.  
Ponte Vedra Beach. FL 32082

ALTERNATE  
Carlos Rosado  
Environmental Engr.  
(904) 246-5531 or  
(904) 241-3679  
80 Ocean Blvd.  
Atlantic Bch., FL 32233

Other emergency organizations and telephone numbers are listed in Table G-1.

G-3 Implementation Criteria

The contingency plan must be implemented under the following circumstances:

1. Fires/Explosions
  - a. fire causes release of toxic fumes
  - b. fire spreads beyond area of ignition
  - c. fire threatens off-site areas
  - d. fire fighting agents result in contaminated runoff
  - e. imminent threat of explosion
  
2. Spills/Leaks
  - a. fire hazard exists due to spilled material
  - b. toxic fume hazard exists
  - c. groundwater may be threatened
  - d. spill threatens off-site property
  - e. spill threatens navigable water
  
3. Flood/Hurricane
  - a. destructive weather threatens storage building
  - b. potential for surface water contamination

TABLE G-1  
EMERGENCY ORGANIZATIONS

<u>EMERGENCY</u>	<u>ORGANIZATION</u>	<u>TELEPHONE*</u>
Injury/Chemical Exposure	Station Hospital	246-5648
	Sta. Indust. Hygienist	246-5648
Fire/Explosion	Station Fire Dept.	246-5333
	Explosive Ordnance Disposal Attachment	246-5412
Hazardous Material Spill	Station Fire Dept.	246-5333
Spill in Waterway	National Response Ctr.	800/424-8802
	COMSEABASEDASWINGSLANT	772-2114
	Coast Guard	
	Captain of the Port EPA Region IV	791-2648 404/881-4062
Natural Disaster	Station Security	246-5583
	Civil Defense	633-5410
Hurricane Threat	National Hurricane Center	305/661-5065

\* All area codes are 904 unless otherwise specified.

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G-4 Emergency Response Procedures

(a) Notification:

In the event of an emergency situation which meets the

implementation criteria, the Emergency Coordinator must be notified by the discoverer. The Emergency Coordinator will make federal, state, local, and Navy-required official notifications if necessary after assessing the situation. The Emergency Coordinator will also notify the Station Security Office, Fire Department, and hospital if necessary.

(b) Identifying type of waste:

The emergency coordinator will determine the types of waste involved, or threatened, in the emergency by reference to the storage bay signs and the building storage log (which is maintained in the chemical lab nearby). If the containers can be approached safely, this identification will be made from the labels on the containers.

(c) Assessment:

The Emergency Coordinator, assisted by the Station Fire Department response unit, will determine whether the emergency poses a major threat sufficient to activate the contingency plan.

(d) Control Procedures:

Potential emergency incidents may be classified under one of the following: (1) fire/explosion, (2) spills/leaks, (3) flood/hurricane. Figure G-1 is an overview of actions to be taken in each event.

#### Fire/Explosion

The hazardous waste storage building has two 20 pound Type A-B-C fire extinguishers mounted not more than 60" from the floor. In the event of a small fire, these extinguishers should be used. Instructions for their use are mounted in the building and shown in Figure G-2.

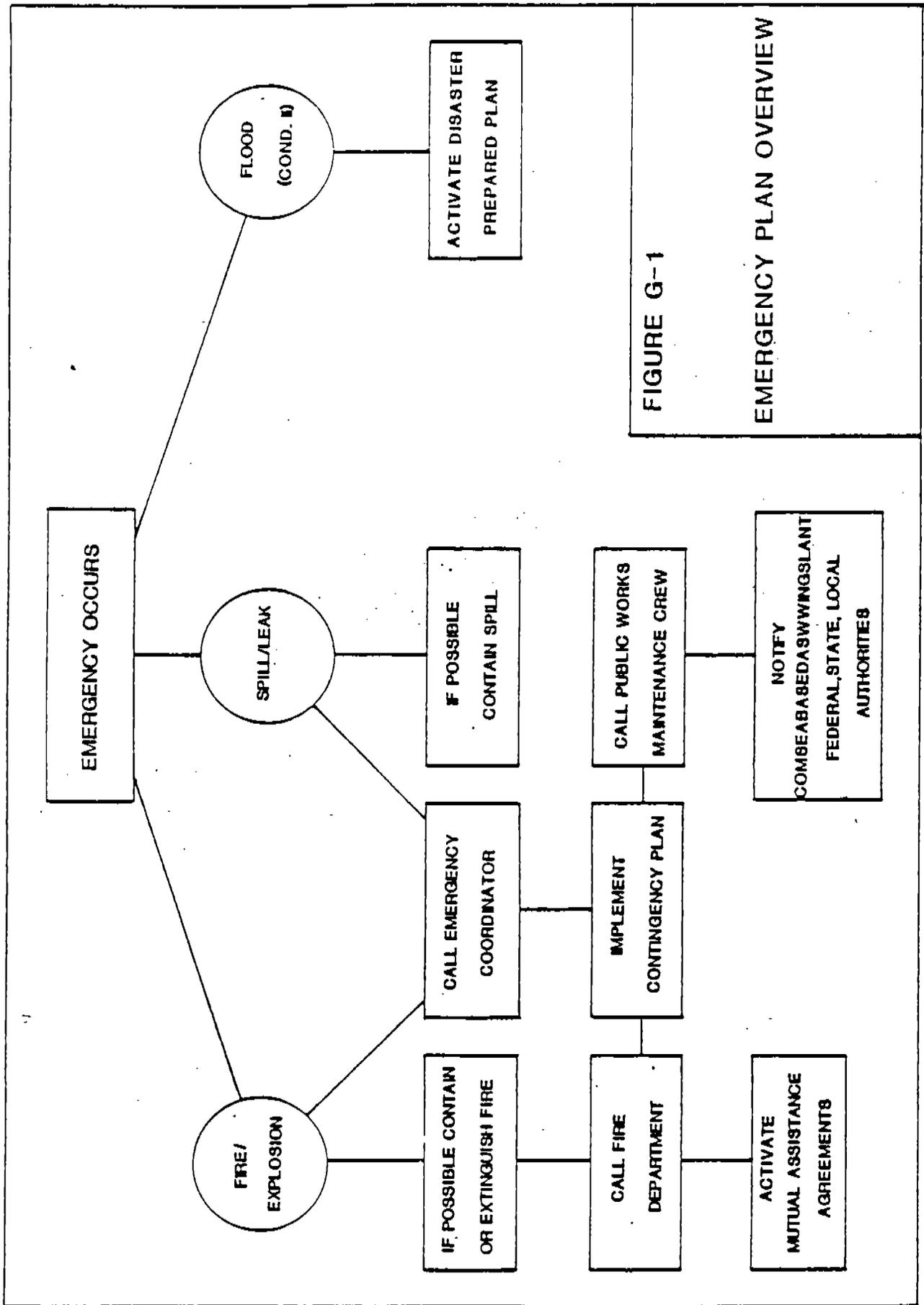


FIGURE G-1

EMERGENCY PLAN OVERVIEW

# WHERE TO USE

## TYPES OF FIRES

LETTER SYMBOL

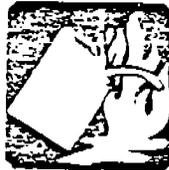
PICTURE SYMBOL



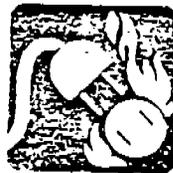
For wood, paper, cloth, trash and other ordinary materials.



For gasoline, grease, oil, paint and other flammable liquids.

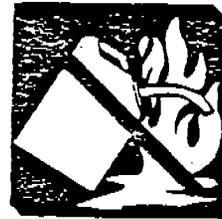


For live electrical equipment.

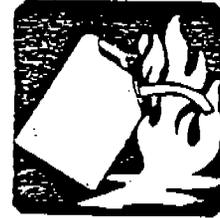


## TYPES OF EXTINGUISHERS

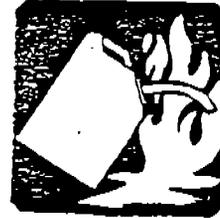
CLASS A



CLASS BC



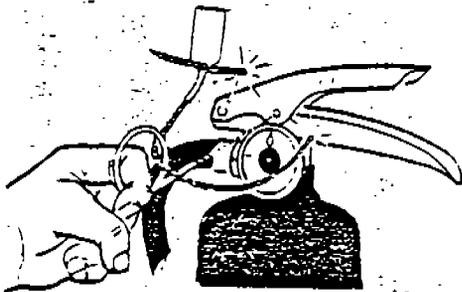
CLASS ABC



# HOW TO USE

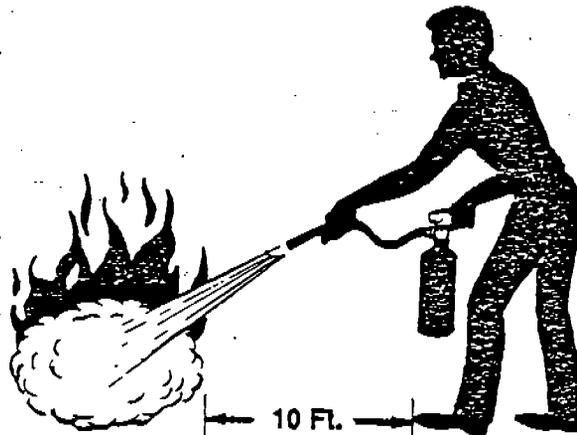
①

HOLD UPRIGHT.  
PULL RING PIN.



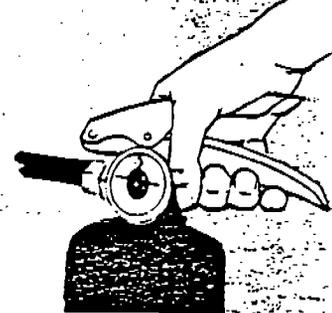
②

START BACK 10 FEET.  
AIM AT BASE OF FIRE.



③

SQUEEZE LEVER.  
SWEEP SIDE TO SIDE.



If the fire cannot be extinguished with these extinguishers, the station Fire Department and the Emergency Coordinator should be telephoned (call Fire Department first). Notify Fire Department dispatcher that a fire has been seen in the hazardous waste storage building. If the fire is localized to a specific storage bay, tell the dispatcher the type of waste located in the bay (from the sign above the bay).

The storage building is easily accessed from a ten foot wide asphalt drive kept clear at all times.

The Station Fire Department will initiate immediate response as follows:

1. Ensure that all personnel have evacuated the storage building. Give first aid to injured personnel.
2. Evacuate nearby chemical laboratory and oil waste treatment facility if necessary.
3. Evacuate any loading/unloading vehicles if they are present.
4. Contact Emergency Coordinator (who will notify all proper Navy commands and federal, state, and local officials as required) and Station Security.
5. If the Fire Commander orders a limited evacuation, the Emergency Coordinator will instruct Station Security to evacuate all personnel within a 1000-ft. radius of the building.
6. Fire Department will conduct fire extinguishing efforts.
7. If the situation warrants, the Fire Commander may telephone or radio for assistance from nearby municipal fire departments under previously signed mutual aid agreements.

8. An "all-clear" signal will be given when the Fire Commander and the Emergency Coordinator agree that the emergency is over.

#### Spills/Leaks

The hazardous waste storage building has been designed with spill/leak containment capable of holding free liquids which spill inside the storage bays. The primary aisle is sloped to a sump for containing spills that occur outside the storage bays. Therefore the most probable emergencies involving spills or leaks of hazardous waste from containers are:

- spills caused by accidents during loading of waste at generating units
- spills as a result of a vehicular accident during movement of waste
- spills caused by accidents during unloading operations at the storage building.

All loading, transfer, and unloading operations are conducted under the close and direct supervision of the Engineering Division Director (currently) or the Environmental Engineer (after 10/1/82). These employees are trained in emergency response. Therefore a trained and qualified person will always be immediately available under the most probable spill scenarios.

In the event of a spill or leak from one or more containers, the Emergency Coordinator will make an immediate assessment of the degree of hazard posed by the spill. This assessment will include the type of material spilled, location of the spill (particularly proximity to the St. Johns River and the ship turning basin), quantity spilled or likely to spill

before containment is achieved, direction of spill and associated vapors if any, potential for injury, and the threat of fire or explosion. Based on this assessment, the Emergency Coordinator will initiate one or more of the following actions:

1. Order the Station Fire Department to mobilize and stand by at the site of the spill for fire protection.
2. Order Public Works personnel to handle spill under his supervision.
3. Notify an outside spill response vendor with whom a pre-arranged contract has been written.

The area impacted by the spill will be evacuated for a distance of 50 feet in all directions. It is not probable that any spill or leak from a container will require greater evacuation.

If the Emergency Coordinator determines that Station personnel can handle the spill, Public Works employees will be ordered to bring liquid spill absorbent material, 85 gallon recovery drums, and personal protective equipment to the spill location. Public Works personnel, instructed in safety procedures and use of emergency equipment, will attempt to contain the spill with absorbent and load solidified material into recovery drums.

The Emergency Coordinator will initiate all required notifications for the spill of a reportable quantity of a hazardous substance (one pound unless a higher quantity has been specified in 40 CFR 117) or hazardous waste.

If the Emergency Coordinator determines that on-station efforts are insufficient, or if navigable waters adjacent to the station are threatened, he will notify the spill response contractor and the appropriate Naval authorities. Immediate action is then initiated as specified in COMSEABASEDASWWINGSLANT instruction 6440.1A, a Contingency Plan for a spill of oil or hazardous substances in inland waters, coastal waters, and navigable waterways.

The Emergency Coordinator will initiate all notifications required by that plan. These notifications include the reporting of a spill of a reportable quantity of any hazardous material, and reports to the appropriate Naval Commands.

The procedures to be followed in the event of a spill include:

1. Locate injured personnel, if any, and notify the Station hospital to mobilize ambulances and medical personnel.
2. Evacuate area within 50 ft radius and alert downwind employees.
3. Dispatch Public Works emergency personnel and associated response equipment to site of spill.
4. Monitor progress to determine whether off-site contractor should be mobilized.
5. Clean-up personnel must use personal protective equipment (gloves, suits, breathing apparatus).
6. Remove leaking drum to a recovery drum.
7. Use absorbent material to contain and solidify liquid.
8. Place all solidified spill material and contaminated spill debris in drums.

After the immediate emergency, the Emergency Coordinator must assess whether unprotected soils have been contaminated and arrange for the removal and containerization of contaminated soils to protect groundwater supplies from contamination. (It is unlikely that sufficient material can spill at one time to pose an immediate threat to groundwater.) The Emergency Coordinator must also ensure that all emergency equipment and safety equipment is cleaned, decontaminated and re-stored for immediate use. Stock of absorbent and recovery drums must be checked and replenished if necessary.

#### Flood/Hurricane

The elevation of the hazardous waste storage building and the drainage of the surrounding area are such that flooding of the building is most likely to occur as a result of destructive weather rather than excessive rainfall. Hurricanes and storms may result in flooding of the St. Johns River near the hazardous waste storage building. Destructive weather is usually accompanied by high wave action. Therefore, Mayport Naval Station has developed a destructive weather disaster preparedness plan. Provisions will be made for the evacuation of the hazardous waste building in this plan when the building is constructed. The destructive weather plan is Annex H of the Station's Disaster Preparedness Plan (OPLAN NR 3-82) and is constantly reviewed and revised to incorporate physical and procedural changes at the Station.

Notification of impending destructive weather or high water is made to the Station by the Naval Weather Service Environmental Detachment on-station in communication with the National Hurricane Center in Miami. The on-station

weather service is fully equipped to monitor weather conditions on a 24-hour basis. After notification, COMSEABASEDASWWINGSLANT (Jacksonville) sets condition alerts for Mayport Naval Station. Condition alerts are altered through constant monitoring of weather conditions. The Condition Alerts are:

- V Hurricane seasonal readiness condition
- IV Threat of destructive weather within 72 hours
- III Threat of destructive weather within 48 hours
- II Threat of destructive weather within 24 hours
- I Threat of destructive weather within 12 hours or less

At Condition II, emergency equipment is issued, transportation vehicles are fueled and Station base housing area is evacuated. The hazardous waste storage building will be evacuated during Condition II.

Evacuation of the hazardous waste building will be the responsibility of the Public Works Department. Appendix H-II-D of the Disaster Preparedness Plan will be modified to add this responsibility.

Public Works personnel will load all containers of hazardous waste onto three flat bed trailers, whose availability will become a requirement of the plan. These trailers will be transported to NAS Jacksonville by trucks owned and operated by NAS Jacksonville, which holds interim status as a hazardous waste storage facility and has notified as a transporter. Appendix I of this Section contains a letter establishing NAS Jacksonville's ability and willingness to receive Mayport Naval Station's evacuated waste. Figure G-3

shows the planned evacuation route to NAS Jacksonville and an alternate route.

The Environmental Engineer will supervise the evacuation which will be accomplished with use of Station personnel. The following equipment will be used:

- 1 forklift from Public Works maintenance
- 3 flat bed trailers from the motor pool
- 1 ton of absorbent material (on stand-by for spills)

All personnel must wear protective gloves and safety glasses and the Emergency Coordinator must stand by in the event of a spill.

(e) Prevention of Recurrence of Fires, Explosions or releases:

The Emergency Coordinator may order the temporary removal of containers of waste from the storage building after an emergency until the building is safe and no recurrence can be expected.

(f) Storage and Treatment of Released Material:

The Emergency Coordinator will order all spilled material, clean-up debris, and contaminated soil to be containerized and stored for later disposal.

(g) Incompatible Wastes:

The Emergency Coordinator will ensure that released material incompatible with other wastes is segregated during temporary storage and that incompatible wastes are not accidentally mixed during clean-up.

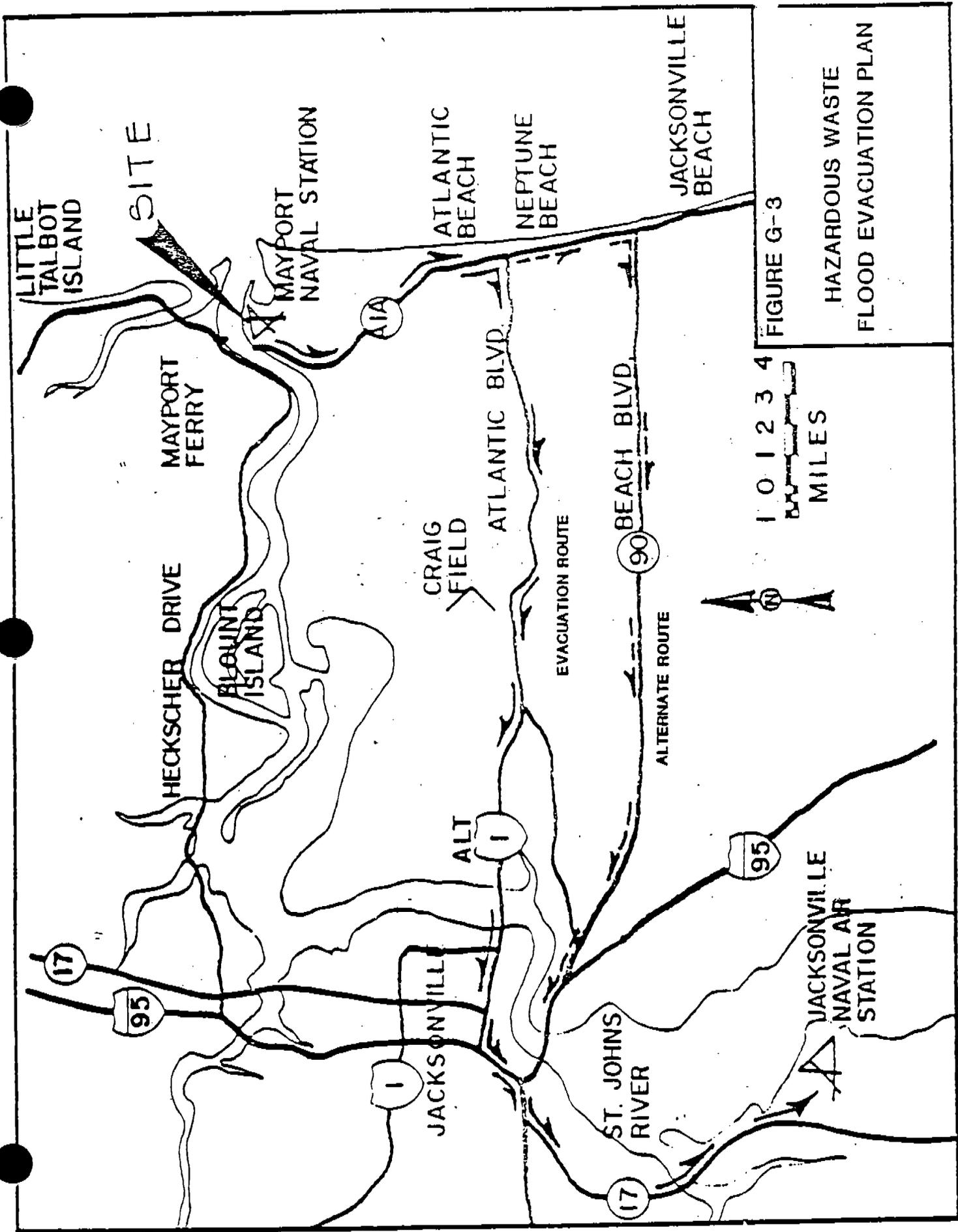
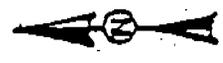


FIGURE G-3



HAZARDOUS WASTE  
FLOOD EVACUATION PLAN

(h) Post Emergency Equipment Maintenance:

After an emergency event, all emergency equipment listed in Section G-5 will be cleaned so that it is fit for use or it will be replaced. Before operations are resumed, an inspection of all safety equipment will be conducted as discussed in Section F. The Regional Administrator and state authorities will be notified that post-emergency equipment maintenance has been performed and operations will be resumed.

(i) Container Spills and Leakage:

Refer to Section G-4(d) for a discussion of emergency response procedures for container spills and leakage.

(j) Tank Spills/Leaks:

Mayport Naval Station does not store hazardous waste in tanks.

(k) Waste Piles:

Mayport Naval Station does not store hazardous waste in waste piles.

G-5 Emergency Equipment

Emergency equipment storage locations are noted on Figure B-8. Personal protective equipment is stored at the chemistry laboratory (CL); the proposed storage building (SB); the safety office (SO); and the fire station (FS).

Recovery drums are stored at the current drum storage area (DS). Absorbent material is stockpiled at Bldg. 1430, near the fire station.

The Fire Department maintains its equipment at the fire station.

Protective personal equipment, first aid kits, and fire extinguishers are also located at all generating sites throughout the facility. Specific personal protection equipment provided to employees handling hazardous waste include:

- neoprene gloves
- nitrile gloves
- safety boots
- rubber aprons
- safety glasses
- cartridge respirators
- chemical resistant suits (Tyvek)

Also available are self-contained breathing apparatus (SCBA), and complete chemical suits. An emergency shower/eye wash has been included in the design of the hazardous waste storage building to supplement two existing showers in adjacent buildings. It is located at the entrance to the general storage area in the building (between Bays 1 and 2). This storage area will also be used for emergency equipment. There are also three fire hydrants in the vicinity of the building.

#### G-6 Coordination Agreements

Mayport Naval Station has entered into the following arrangements to assist in response to emergency situations:

1. Mutual Fire Fighting Assistance Agreements with the City of Neptune Beach, FL; the City of Atlantic Beach, FL, and the City of Jacksonville, FL.

TABLE G-2

MATERIALS AND EQUIPMENT  
FOR SAFE EMERGENCY RESPONSE

<u>MATERIAL/ EQUIPMENT</u>	<u>QUANTITY</u>	<u>FUNCTION</u>	<u>COMMENTS</u>
Type I Sea Curtain	1500 feet	Floating spill boom	Use for spills of oil and other lighter-than-water materials.
Type II Sea Curtain	500 feet	Same as above	Same as above.
Self-propelled oil skimmer	1	Removes floating oil	Same as above.
Bumper trucks	3	Fire fighting	Two fire trucks have 750 gal capacity. One has 1000 gal capacity.
55 gal. recovery drums	25	Spill response	Use to overpack leaking 55 gallon drums and for containerizing spilled material and spill debris.
Absorbent	500 lbs.	Spill response	Use to solidify and contain spills/leaks from container acids or caustics.
Fork lifts	3	Drum removal	Use to move drums of waste that are leaking.
Excavator	1	Spill clean-up	Use to remove contaminated soil after spill.

NOTE: All above material and equipment is stored within the Station)

2. Copies of the contingency plan will be sent to the Station Hospital, Station Fire Department, Station Safety Office, Station Security Officer, Explosive Ordnance Disposal Detachment, and the Coast Guard Captain of the Port before the storage building is occupied.

G-7 Evacuation Plan

The Emergency Coordinator and the Station Fire Chief are responsible for determining whether evacuations are necessary in the event of an emergency. (Except for evacuation due to destructive weather, which is automatic on a Condition II alert.)

The hazardous waste storage building will be located in a remote section of the Station, removed from all residential and administrative areas. It is unlikely that an evacuation of the entire Station will be necessary under any emergencies (except flood). The area around the proposed building contains the chemical laboratory and the oily waste treatment facility. Personnel from these areas may require evacuation.

If the Emergency Coordinator determines that evacuation of these areas is necessary, Station Security will notify occupants and instruct them to leave the immediate vicinity and rally at the Mayport gate. Security will open this gate and all evacuated personnel will leave the Station. Security will also close off access to the Station perimeter road except to emergency vehicles.

Reentry to the area will be allowed only when the Emergency Coordinator gives an "all-clear" order.

G-8 Required Reports

In addition to the verbal notifications to be initiated by the Emergency Coordinator, written follow-up reports will be prepared. All emergencies which require the implementation of the contingency plan will be reported in writing within 15 days to the Administrator, EPA Region IV. The report will detail name of the facility, date, time, and type of accident, type and quantity of material involved, extent of injuries, an assessment of the impact on human health and the environment, and the quantity and disposition of material released.

In addition, reports must be filed with the Public Works Officer and other Navy officials. After an emergency, the Emergency Coordinator will review the Contingency Plan for effectiveness and make changes as are appropriate. The plan will also be reviewed when emergency coordinators, emergency equipment, or the hazardous waste management plan are altered.

G-9 SPCC Plan Amendments

Provisions for a Spill Prevention, Control, and Countermeasure Plan are made in a separate Naval instruction. That plan was prepared and is maintained according to the provisions of 40 CFR 112. The plan is available upon request.

SECTION I  
CLOSURE PLAN, POST-CLOSURE PLAN, AND  
FINANCIAL REQUIREMENTS

This Section is submitted in accordance with the requirements of 40 CFR §122.25(a)(13), §264.112 through 115, & §264.178. This plan identifies all steps that will be necessary to partially close the facility at any point during its intended operating life and to completely close the facility at the end of its intended operating life. The plan also addresses the conditions and reasons under which partial closure will occur. A post-closure plan is not required because this is not a disposal facility and all wastes will be removed at closure.

Mayport Naval Station will maintain an on-site copy of the approved closure plan and all revisions to the plan until the Certification of Closure Completeness has been submitted and accepted by USEPA, Region IV. The Base Commander or authorized representative will notify the Regional Administrator at least 180 days prior to the date the storage facility expects to begin final closure. The closure date for the storage facility will be 2032. Upon completion of closure, Mayport Naval Station will submit to the Regional Administrator a certification by both the Naval Station and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. Partial closure of the container storage operations is not planned. However, in the event that future circumstances or decisions force the station to discontinue hazardous waste container storage activities, Sections 1(c) and 1(e) of the

closure plan present procedures for final closure of the storage area. Any modifications to the existing facility equipment, structures, instruments or procedures related to the management of the facility will result in Mayport Naval Station revising the closure plan accordingly.

At a maximum, the storage building will contain 264 drums. Section 1 (d) of the closure plan lists the typical inventory of wastes in storage at any time during the operating life of the storage building.

#### I-1 Closure Plan

##### (a) Closure Performance Standard [40 CFR 264.111]:

This closure plan was designed to ensure that the facility will not require further maintenance and controls, minimizes or eliminates threats to human health and the environment, and avoids escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground or surface waters or to the atmosphere. If there is evidence of any spills or leaks, samples will be taken and analyzed to determine the extent of contamination in the soil and, if necessary, in groundwater. Any contaminated soil will be excavated, removed, and disposed at a proper disposal facility. Any contaminated ground water will be remedied. The entire site will be regraded subsequent to closure to prevent erosion.

##### (b) Partial Closure:

The complete storage building will be utilized throughout its operating life; therefore no partial closure is planned. Waste evacuation, under potential flood conditions

approaches partial closure, inasmuch as all waste containers will be removed from the facility. (See Section G-2(d)). However, after the occurrence of a flood, the trenches and sump will be cleared of floodwaters and normal operations will resume.

(c) Partial and Final Closure Activities:

Mayport Naval Station expects to perform partial closure when all the drums are removed for final disposal and no more drums will be stored. Final closure activities on the storage facility will occur in 2032. Procedures for final closure of the storage facility, including drum removal, clean-up and decontamination activities are described in Section 1(e).

At a maximum there will be 264 drums of waste material in storage during the operational life of the storage facility. Section (d) describes the typical inventory of waste in storage at any time during the operational life of the storage facility. Mayport Naval Station will enter into a contractual agreement with an authorized hazardous waste disposer.

(d) Maximum Waste Inventory:

The following table shows the maximum inventory of wastes in storage at any given time during the operating life of the

(e) Inventory Removal and Disposal and Decontamination of Equipment:

After all drums have been shipped to a permitted disposal facility, the Environmental Engineer will inspect each bay and have any loose items, i.e., papers, pallets, or containers, removed and packaged for disposal as hazardous waste. A Registered Professional Engineer will certify the hazardous waste storage facility is ready for decontamination.

Under the direction of the environmental engineer, trained technicians wearing rubber gloves, rubber boots, full protective coveralls, and self-contained breathing units, will wash each bay with water and a non-ionic light surfactant. All washings will be contained in the individual sumps. The first washings will be drummed for disposal as a hazardous waste. Once this step is completed the bay will be rinsed with clean fresh water. A representative sample of the rinse water will be taken from the sump and analyzed for the following parameters:

Ignitability, Corrosivity, Reactivity, and EP Toxicity. If the rinse waters do not fail any of these tests, the bay will be certified as being decontaminated. Each bay will be decontaminated individually and in order (1, 2, 3 ---- etc). Once the decontamination process for the storage facility is completed, the Environmental Engineer will certify the results of all tests and a Registered Professional Engineer will visually inspect the storage facility, review the test results of each bay and, if all criteria as described above has been met, certify the facility to be decontaminated.

The soil will not be contaminated from the activities of the storage facility, since all spills are collected in the internal trenches and sump.

(e-1) Closure of Containers:

All drums will be sealed and labeled prior to shipment. Each classification (i.e., Flammable, Oxidizer, Toxic, Corrosive) will be shipped by compatibility analysis. Those materials that are not compatible will be shipped separate from all other materials. The drums will be loaded by forklift.

(e-2) Closure of Tanks:

There are no tanks in the storage facility.

(e-3) Closure of Waste Pile:

There is no waste pile.

(f) Schedule for Closure:

Within 90 days of receipt of the final volume of waste material, final closure activities will be initiated.

Closure will be completed within 180 days thereafter. Notification of intent to close will be sent to the Regional Administrator of the USEPA 180 days before beginning of final closure. A Registered Professional Engineer will certify each phase of closure as follows:

1. Initial inspection of containers readied for shipment and the final volume of waste has been received.
2. Facility decontamination; visual and record inspection to insure each bay and the entire facility has been decontaminated as per the above procedure.
3. Final inspection and certification to state and federal authorities.

(g) Extension for Closure Time

Mayport Naval Station does not anticipate a need for extension at this time.

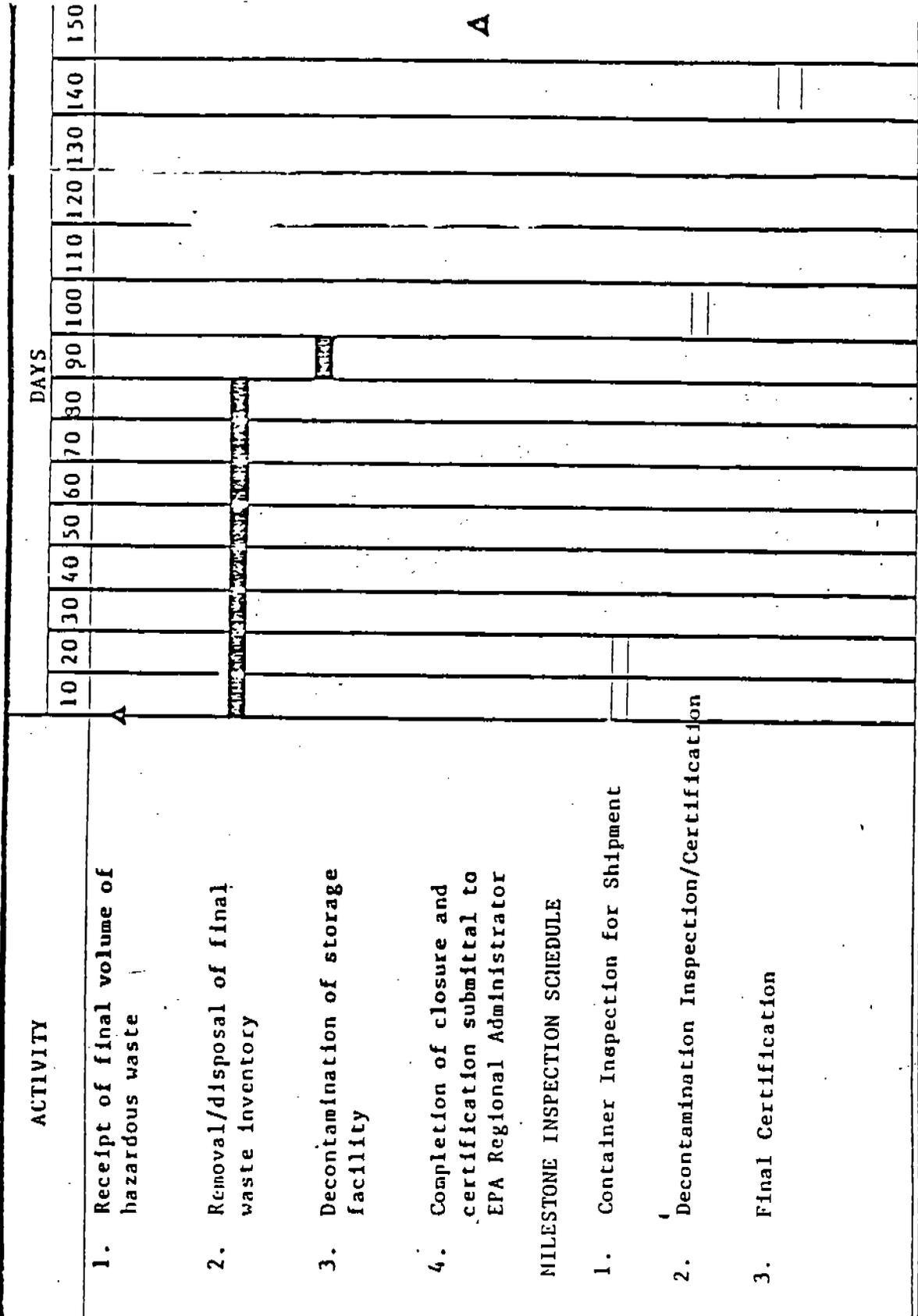
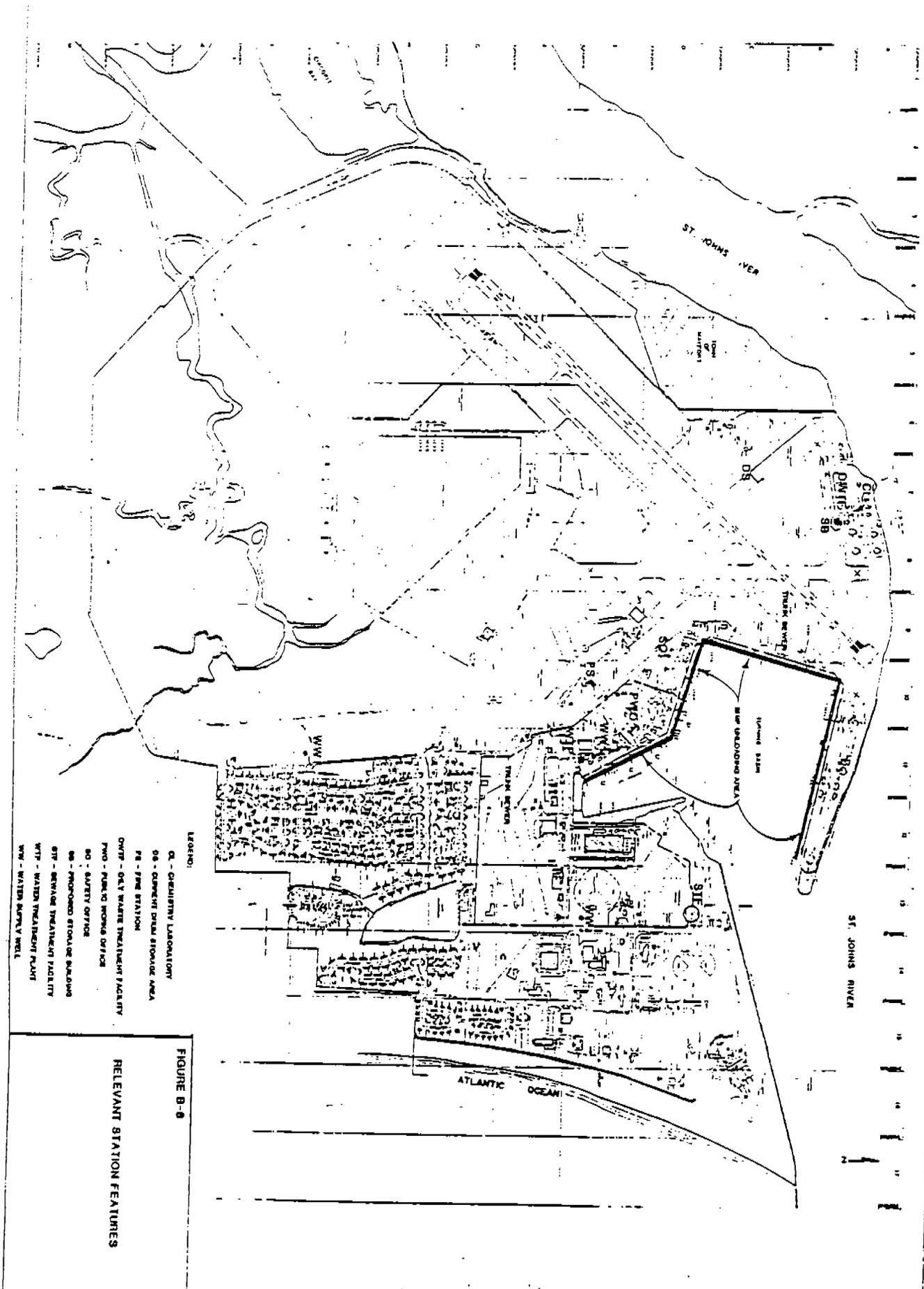


FIGURE I-1 CLOSURE SCHEDULE

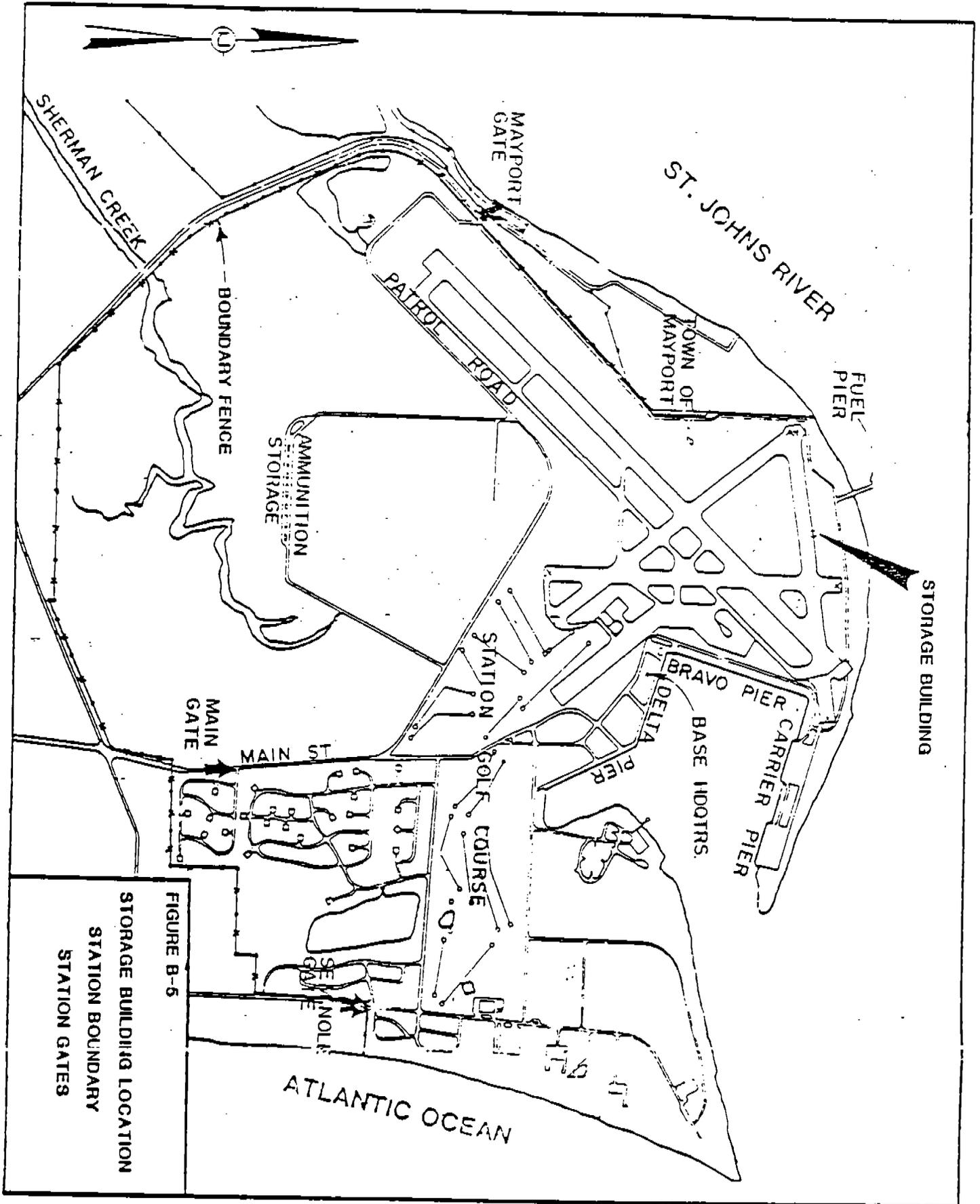


LEGEND:

- CL - CHEMISTRY LABORATORY
- CS - CURRENT DRYUM STORAGE AREA
- FS - FIRE STATION
- DWTF - DAILY WASTE TREATMENT FACILITY
- PWMO - PUBLIC WORKS OFFICE
- SO - SAFETY OFFICE
- SS - PROPOSED STORAGE BUILDING
- STF - SEWAGE TREATMENT FACILITY
- WTF - WATER TREATMENT PLANT
- WM - WATER MAIN
- WSW - WATER SUPPLY WELL

FIGURE B-8

RELEVANT STATION FEATURES



SECTION D  
PROCESS INFORMATION

The information provided in this Section is submitted in accordance with the requirements of 40 CFR 122.25(b)(1), (2), and (4). Other regulations addressed in the section include 40 CFR 264.17, 264.171, 264.172, 264.173, 264.175(b), 264.176 and 264.177, and specific process information for the storage of hazardous waste in containers. Mayport Naval Station does not store hazardous waste in tanks or waste piles.

While in interim status, Mayport Naval Station stores containers of hazardous waste in a fenced open storage compound. For permanent status, a container storage structure is planned. This section details design and management of the planned storage structure. The designs and specifications of the container storage building are certified by a registered professional engineer and are in full compliance with U.S. Navy building codes.

D-1 Containers

## (a)(1) Container Storage Building:

The maximum inventory of drums at any given time during the operating life of the facility is not expected to exceed 264 drums. The container storage area, which will be located on the north-northwest side of the facility (See Figure B-8) will be a covered structure. This structure will be constructed when the final permits are issued by the EPA Region IV office and the State of Florida. Drawings and general specifications are part of this application. Drummed wastes will include flammable solvents, mercuric nitrate, dip varnish, toluene, methyl ethyl ketone, plating

solutions, and mercury solutions. Therefore the building has been designed for the storage of free liquids.

(a)(1) Container storage:

The storage building will be located at the north side of the Station, adjacent to a taxiway that is no longer used, and substantially removed from high traffic areas, residential, and administrative areas.

A 3800 square foot container storage building is planned. The building will be divided into seven storage bays and each bay will have separate spill containment structures. This design will allow maximum flexibility in segregating incompatible wastes. The building is designed for a maximum inventory of 264 palletized 85 or 55 gallon drums, including aisle space allowance. Six bays are designed for a maximum of 36 drums and the seventh for 48 drums. The container storage bays occupy 1935 square feet.

In addition to seven container storage bays, the building will contain 1213 square feet of primary aisle space for the use of forklifts, a 121 square foot storage area for emergency equipment, 531 square feet of spill collection tranches, curbs, and fencing, and 288 square feet of access ramp (not included in the 3800 square foot total).

The building has a maximum capacity of 66\* pallets. With two drums per pallet and stacked two pallets high, the maximum capacity for 55 or 85 gallon drums is 264. However the building will also house wastes stored in other container sizes, including 1 gallon, 5 gallon, and 30 gallon sizes. Figure D-1 is a plan view of the building. Figure D-2 is a cross-sectional view showing two pallet stacking, typical of

\*66 pallets on the floor; 132 pallets, when stacked two pallets high

Date: 11/30/82  
 Revision No.: 1  
 Section D

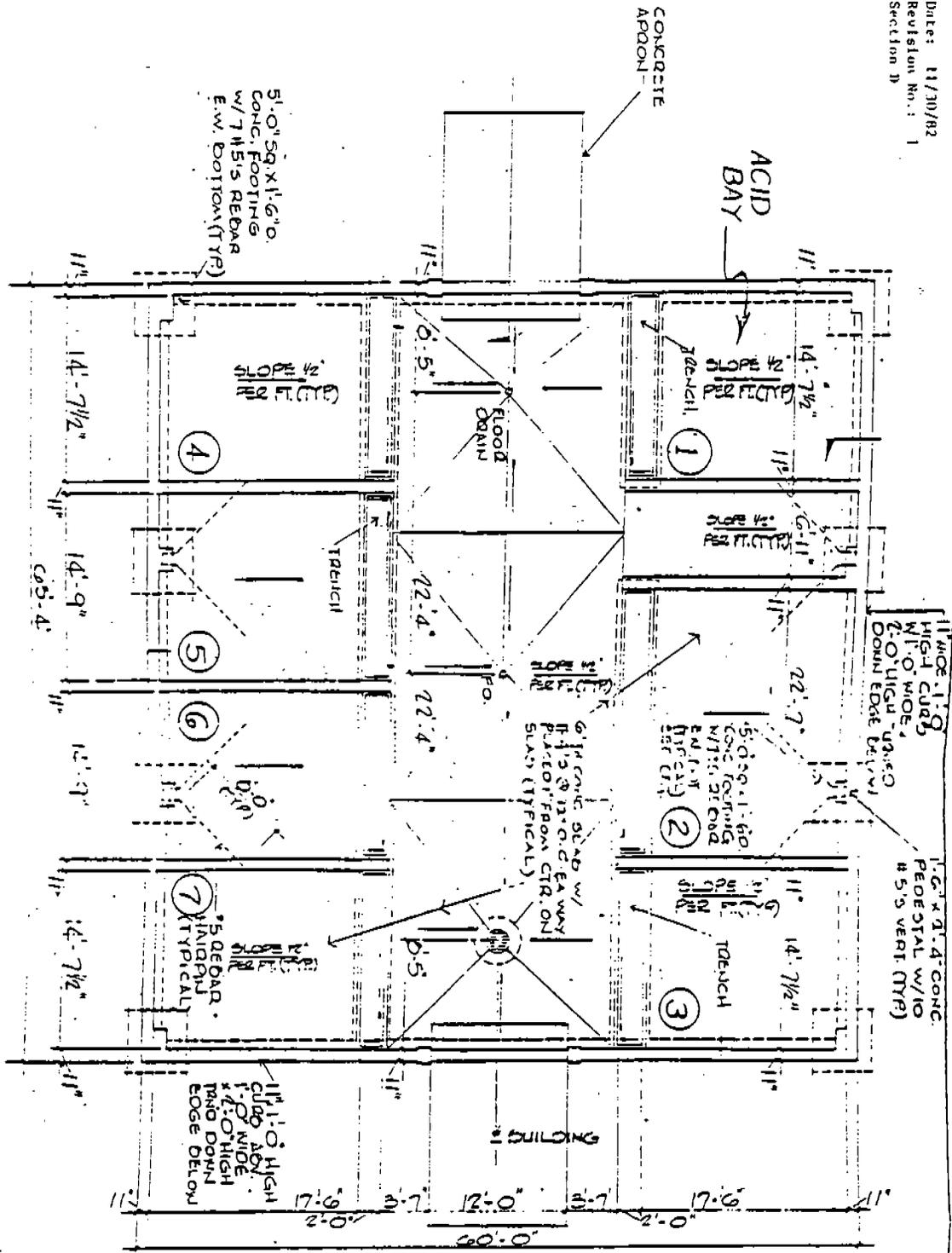


FIGURE D-1  
 STORAGE BUILDING  
 PLAN VIEW

47

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TABLE D-1

CONTAINER STORAGE BAYS

<u>BAY NO.</u>	<u>STORAGE LIMITATIONS</u>	<u>DIMENSIONS</u>	<u>MAXIMUM NO. * OF PALLETS on Floor</u>	<u>MAXIMUM NO. OF 55 GALLON DRUMS</u>
1	Acid waste only	14.7' x 17.5'	9	36
2	Reserved for ignitable waste	22.5' x 17.5'	12	48
3	No acids	14.7' x 17.5'	9	36
4	No acids	14.7' x 17.5'	9	36
5	No acids	14.9' x 17.5'	9	36
6	No acids	14.9' x 17.5'	9	36
7	No acids	14.7' x 17.5'	9	36

\* Allowing for adequate aisle space [see Section D-1(a)(3)]

\*\*When stacking two pallets high.

55 gallon storage arrangements. Table D-1 presents the dimensions and capacity of each bay.

The building design incorporates a sloped metal roof with a 5 foot eave, over a continuous concrete slab and surrounded by 10 foot high vinyl coated woven wire fence.

(a)(2) Description of Containers:

The containers used for the storage of hazardous wastes are generally 55 gallon steel drums meeting the specifications of a U.S. Department of Transportation (DOT) 17E or 17C and are stamped as such. Hazardous wastes are never placed in unwashed containers, except materials which are returned to their original container as waste. Some ship-generated wastes are packaged in other types of containers. In all cases however, containers meet DOT specifications for the type of material inside the package. Under the direction of the Engineering Division Director (currently) or the Environmental Engineer (after 10/1/82), the contents of these containers may be combined into a new 55 gallon steel drum. Under no circumstances are different types of wastes mixed in the same drum. When consolidation is required, small containers of waste are placed in 55 gallon drums and vermiculite is used as a cushioning and absorbing agent. This procedure is used primarily to consolidate small containers of paint waste which is compatible with the vermiculite. Before consolidating other wastes, the Environmental Engineer must determine that waste's compatibility with vermiculite by reference to the HMIS. Unused material wastes (as discussed in Section C) in unopened containers will not be repackaged but will be stored in their original container on pallets. No stacking of pallets in a storage bay will be allowed if containers

other than 55 gallon or 85 gallon steel drums are on a pallet. The 85 gallon steel drums are DOT specification 17C or 17H overpack drums which are available for emergency containment of leaking 55 gallon drums.

(a)(3) Container Management Practices:

In accordance with the Mayport Naval Station Hazardous Waste Management Plan and the Shipboard Hazardous Material/Waste

Management Plan (reference D-1), it is the responsibility of each generating unit to ensure that all hazardous wastes delivered to the storage building meet the following conditions:

- The waste is compatible with its container
- The container is properly sealed
- The container is properly labeled
- A properly completed turn-in document, identifying the waste, accompanies the container.

At the storage building, the Environmental Engineer will direct the placement and removal of each container into or from the appropriate storage bay. In order to accommodate the variability in quantities of wastes, only two of the seven bays are dedicated to specific types of wastes. All acid wastes will be stored in Bay number 1. (See Figure D-1). A sign will be permanently attached to the exterior fence of that bay, facing the aisle, reading "ACIDS" in 4-inch letters.

Because of the volumes of flammable wastes generated, the largest bay, Bay Number 2, will be reserved for flammable wastes. Until that bay receives its capacity of flammable wastes (48 55-gallon drums), all flammable wastes will be stored there. A sign will be permanently attached in Bay Number 2 reading "FLAMMABLES." Should that bay be at maximum capacity when additional flammable wastes are received, the received wastes will be placed in accordance with the management practices described below.

Bays Number 3 through 7 (see Figure D-1) will be managed to receive the following types of wastes:

- caustics
- halogenated organics
- oxidizing materials
- flammables
- cyanide solutions
- general wastes.

With regard to those wastes, these management practices will be implemented by the Environmental Engineer:

#### EMPTYING OF A BAY

- Remove all containers from bay
- Inspect the trench. If any liquid is present, remove it by sump pump, wash down bay floor and trench, and remove rinsewater. The removed liquids will be analyzed, identified, containerized and labeled for proper disposal.
- Remove sign(s) from bay fence.

#### PLACING CONTAINERS IN EMPTY BAY

- Place containers in bay assuring adequate aisle space (5 feet in bay(s) containing flammable wastes; 2 feet, 9 inches in all other bays).
- Attach appropriate sign inside bay.

#### PLACING CONTAINERS IN OCCUPIED BAY

- Determine compatibility of received waste with that already present, using the compatibility table from 46 FR 28728 (reference D-2), appearing in Table D-2 supplemented by the information in the Fire Protection

TABLE D-2<sup>(1)</sup>  
COMPATIBLES

The mixing of A and B materials in a Group Number may cause chemical reaction, fire, explosion, or generate toxic gases.

GROUP 1

<u>A</u>	<u>B</u>
Ammonia	Acetic acid
Descaling compound	Alodine
Sodium hydroxide	Battery acid
Aniline	Boiler Passivator
	Disodium phosphate
	Sulfamic acid
	Trisodium phosphate
	Nitric acid
	Film developing chemicals
	Etching solution
	Formic acid
	Ni plating solution
	Paint remover
	Sulfuric acid
	Tin plating solution
	Zn plating solution
	Ethylene diamine acetate

GROUP 2

Al, Be, Ca, Li, Mg, K, Na, Zn (none at Mayport)	Any Group 1 waste
---	-------------------

GROUP 3

Alcohol Water	Any concentrated Group 1 waste
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GROUP 4

Alcohols, trichloroethane, ethyl acetate, ethyl butanol, perchloro- ethylene, trichloroethylene trichlorotrifluoroethane	Any Group 1 waste
--	-------------------

TABLE D-2<sup>(1)</sup> (continued)

COMPATIBLES

GROUP 5

Cr plating solution	Any Group 1-B waste
Ag plating solution	

GROUP 6

Alodine	Group 2-A wastes
Sodium nitrate	Group 4-A wastes
Sodium nitrate flux	Sulfuric acid

(1) From: Fire Protection Guide on Hazardous Materials

Guide on Hazardous Materials (reference D-3).

- Place containers in appropriate bay assuring adequate aisle space.
- If the received waste is of a different type than indicated by the sign in the bay, attach an additional sign identifying the received waste type.

When chlorinated wastes are received, the Environmental Engineer will ensure that all aluminum and galvanized materials are removed from the bay receiving that waste.

The Environmental Engineer will have a sufficient number of signs identifying each type of waste to allow adequate waste type identification.

(a)(4) Operating Log:

The Environmental Engineer will maintain a log of wastes received and removed from the building. Each container of hazardous waste will be entered on the log. Upon receipt of the hazardous waste and the turn-in document from the generating unit, the following information will be entered on the log:

- Log number (each container will be assigned a unique log number)
- Date of receipt of waste at the storage building
- Identity of generating unit
- Container type
- Container volume
- USEPA hazardous waste number
- Description and classification
- Storage bay number

Upon shipment off-site, the following information, specific to each container shipped, will be entered on the log:

- Date of shipment (from the Hazardous Waste Manifest)
- Hazardous Waste Manifest number

(a)(5) Secondary Containment System Design and Operation:

The container storage area pad is constructed of concrete with a design loading of 500 pounds per square foot and a concentrated load of 2000 pounds over a 2' 6" x 2'6" area. Each bay is surrounded by a 12" curb on 3 sides (see Figure D-3). Each floor is sloped at one-half inch per foot toward the containment trench. Each trench is isolated from all other trenches by a monolithic footing of the adjacent curb (see Figure D-4). The holding capacity of each trench is presented in Table D-3.

A sump and floor drain is constructed in the center aisle that is isolated from the trenches. That sump will hold 400 gallons.

A moisture barrier will be placed beneath the entire floor pad and all expansion cracks will be sealed with an acid resistant epoxy to prevent seepage into the subsurface soils. As previously noted, there are two entrance ramps that will allow access for a 2,000 pound forklift for loading and unloading. The entire floor surface will be coated with synthetic epoxy resin. The slab will be inspected on a regular basis to ensure the integrity of its surface. In the event of a spill, a portable sump pump will be used to collect the spilled material from the collection trenches for recontainerization. All wastewater will be

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TABLE D-3

COLLECTION TRENCH CAPABILITIES

(Each Bay to Have Separate Trench. See Figure D-1)

TRENCH DIMENSIONS	BAY(S) SERVED	CONTAINMENT CAPACITY CUBIC FEET	CONTAINMENT CAPACITY GALLONS	MAXIMUM NO. OF 55-GAL. CONTAINERS Per Bay	MAXIMUM GALLONS STORED Per Bay
		----- Per Bay -----			
2'W x 4'D x 14'-7"L	1, 3, 4, 7	117	875	36	1980
2'W x 4'D x 22'-7"L	2	181	1355	48	2640
2'W x 4'D x 14'-9"L	5, 6	118	885	36	1980

analyzed and, if necessary, the washwater will be containerized for disposal.

The entire structure has a 10' high woven wire fence to enclose the storage area. Both access gates will be locked. In addition, the structure is enclosed in a compound with a 6-foot fence and secured by a locked gate.

(a)(6) Run-on Prevention:

Because of the 5' overhang of the roof, precipitation will not enter the storage building. The curbing will be 12" above grade to prevent run-on.

(a)(7) Removal of Liquids From Collection System:

Each bay has an individual sump designed to capture all spills and leaks. (Ref. Figure D-3 and Table D-3). If a spill occurs or a container leaks, the collected liquid in the sump can be identified by the label on the leaking or spilled container. If the label has been destroyed, then a visual determination will be used. If the material cannot be readily and correctly identified by any of the above methods, a sample of the spilled material will be sent to a laboratory to be analyzed in accordance with the test methods described in Table C-4, page 41 of this document. The building sumps are protected from intrusive liquids that originate from any other sources other than the containers within a particular bay. Therefore, the frequency of liquid removal from any sump/bay area is limited to a spill or leak event. Each event will be handled as it occurs and there will not be an accumulation of several spills. The central floor drain and collection sump will be handled in the same manner as the bay sumps.

All spilled material and clean-up material will be drummed in an appropriate DOT approved container and held for proper disposal. Sump pump specifications are as follows: Electric motor TEFC Class 1 Division 1 explosion proof  $\frac{1}{2}$  horse power diaphragm pump, self priming with a minimum of 10 foot suction lift, with a 1 $\frac{1}{2}$ " - 2" outlet. Pumping requirements of minimum 10 gpm - 40 gpm. Diaphragm material to be compatible with acids and caustic type liquids.

(a)(8) Containers Without Free Liquids:

This section does not apply because all containers (drums) may contain free liquid.

D-2 Tanks

There are no storage tanks at the Station.

D-3 Waste Piles

There are no waste piles at the Station.

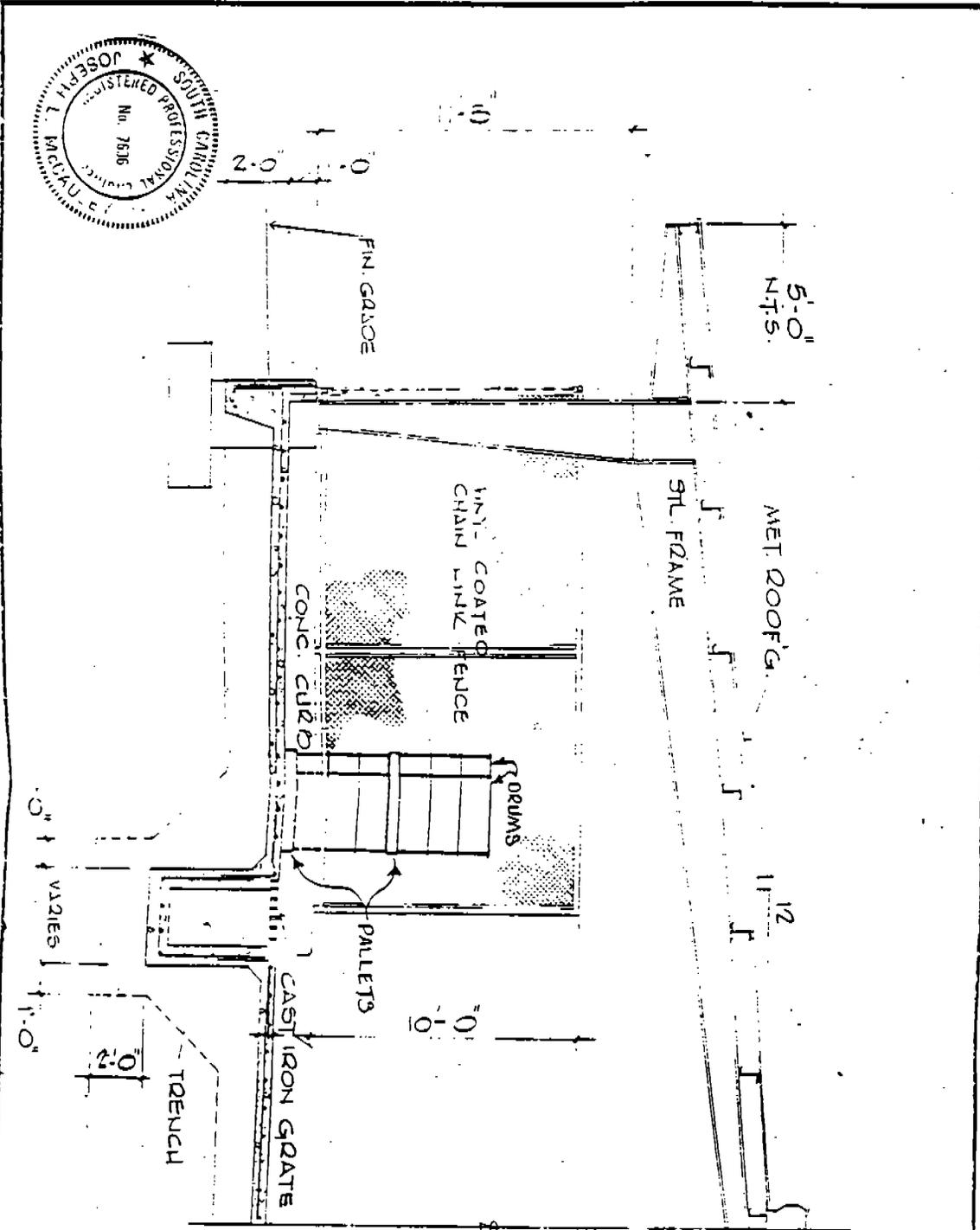
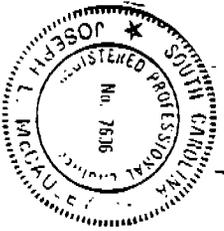


FIGURE D-2  
STORAGE BUILDING  
PROFILE  
(WITH STACKED DRUMS)

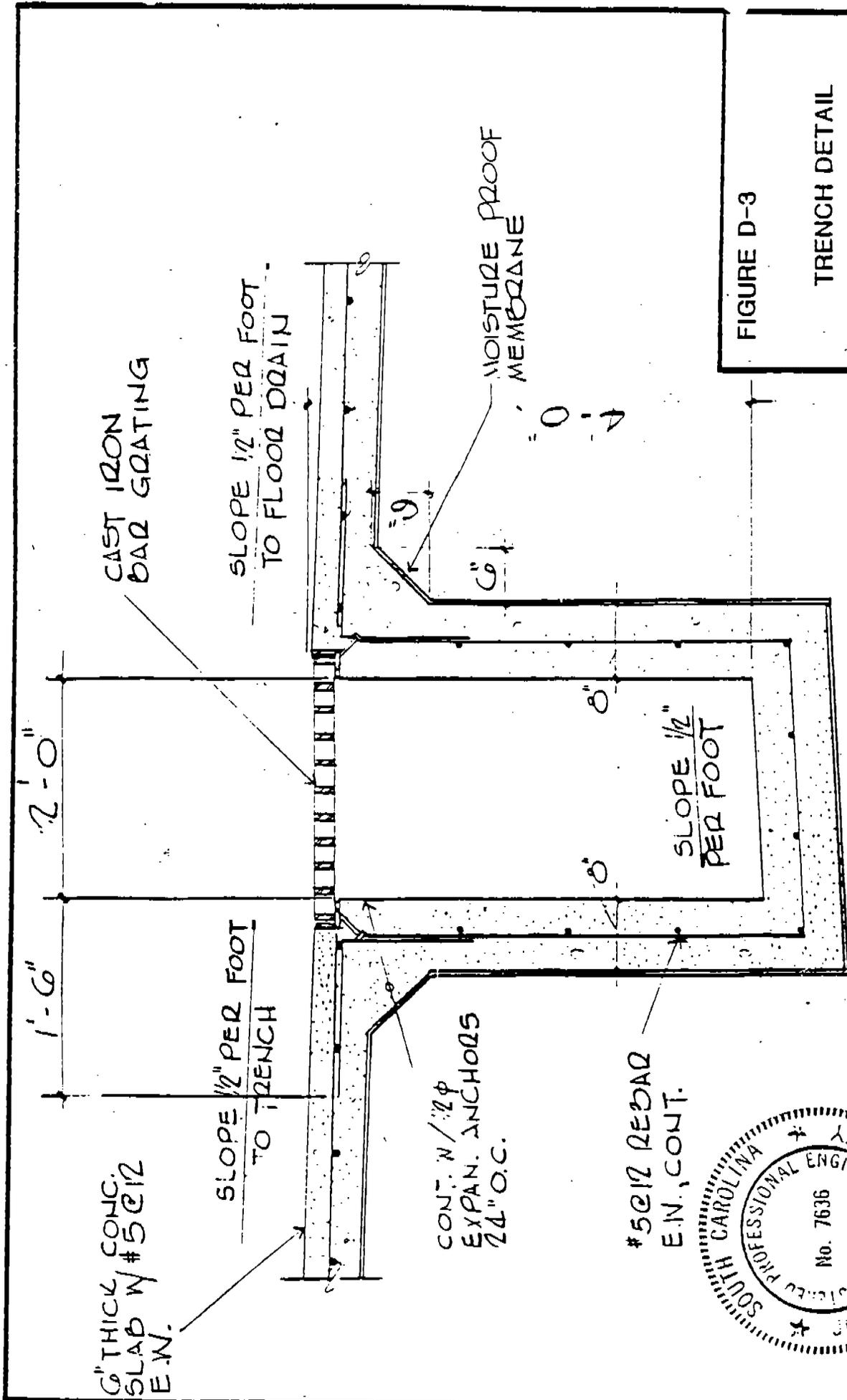
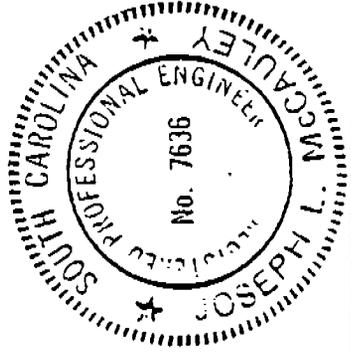


FIGURE D-3

TRENCH DETAIL

(NOTE MOISTURE BARRIER)



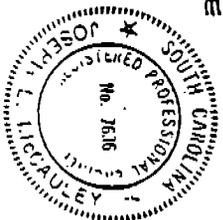
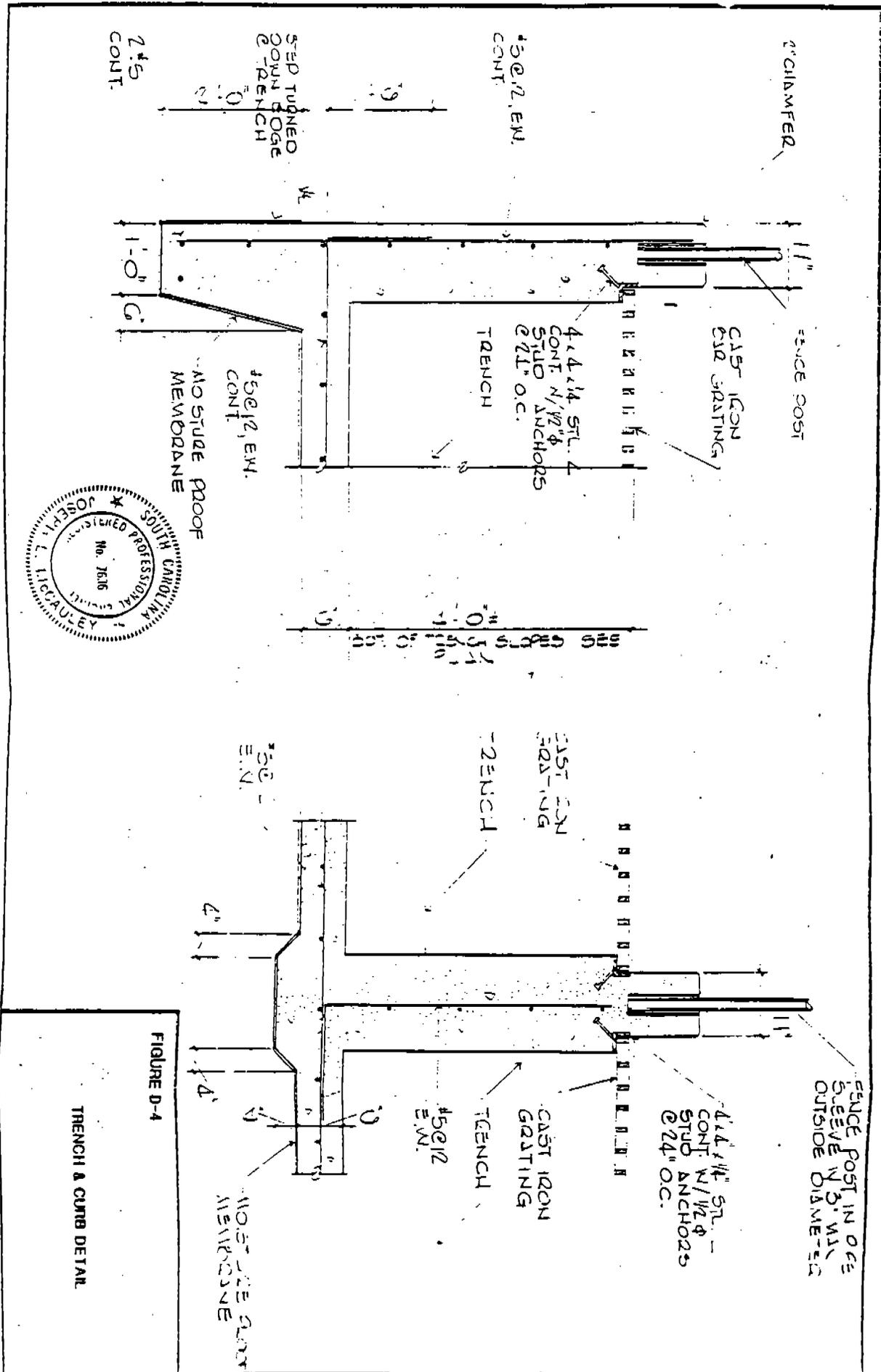


FIGURE D-4  
TRENCH & CURB DETAIL

REFERENCES

- D-1 Naval Sea Systems Command, Shipboard Hazardous Material/Waste Management Plan, August, 1981.
- D-2 Federal Register, Vol. 46, p 28726, 1981.
- D-3 National Fire Protection Association, Fire Protection Guide on Hazardous Materials, Seventh Ed., Boston, MA, 1978.

F-5 Prevention of Reaction of Ignitable, Reactive, and Incompatible Wastes

(a) General precautions:

The proposed storage building will be used to store ignitable wastes and incompatible wastes. Very small quantities of reactive wastes (F007) may also be stored in the building. The following precautions have been taken to prevent reactions involving these wastes.

- The compatibility of all containers with the contained waste is ensured by the exclusive use of DOT specification containers appropriate to the waste (as determined from 49 CFR 172.101 and 173).
- External sources of ignition and reaction are restricted by signs forbidding smoking within 50 feet of the building, signs forbidding open flames (welding, etc.), a roof with five foot overhang to prevent solar heat buildup, the exclusive use of spark-proof (brass) tools (bung pullers, wrenches, etc.), and the placement of all electrical power distribution equipment in the ceiling (at least 3 feet from all containers).

(b) Management of ignitable, reactive, and incompatible wastes in containers:

To prevent the accidental mixing of incompatible wastes, the storage building has been subdivided into storage bays. Each storage bay is equipped with spill curbs on three sides, and a spill collection trench on the fourth side, facing the main aisle. Each spill collection trench is independent of all others. In the event of a spill in the storage bays, incompatible wastes will be prevented from mixing by the trenches.

Prior to storage, all containers are sealed and labeled. The label includes the shipping name, EPA waste number, and the date of generation. Selection of the appropriate storage bay for a container will be made by the Environmental Engineer who will review the waste analysis results and appropriate data in the Hazardous Material Information System (discussed in Section C). Based on this data, the container is placed in a storage area not

containing an incompatible waste. Section D fully discusses the operation of the storage bays in the building. The building is designed with a 19-foot aisle to allow ease of access to the storage bays for a forklift without risk of damage to containers during unloading/loading operations.

The storage building is located more than 500 feet from the nearest property line.

(c) Management of ignitable, reactive, and incompatible wastes in tanks:

Mayport Naval Station does not store hazardous waste in tanks.

(d) Management of ignitable, reactive, and incompatible wastes in waste piles:

Mayport Naval Station does not store hazardous waste in waste piles.