



DEPARTMENT OF THE NAVY
COASTAL SYSTEMS STATION DAHLGREN DIVISION
NAVAL SURFACE WARFARE CENTER
6703 WEST HIGHWAY 98
PANAMA CITY FL 324077001

IN REPLY REFER TO:
5726
Ser 051/028

7 APR 1995

N61331.AR.000386
NSWC PANAMA CITY
5090.3a

David M. Moore, Esq.
Assistant Regional Counsel
U.S. Environmental Protection Agency
Office of Regional Counsel
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: Complaint and Compliance Order - Docket No. 95-02-R

Dear Mr. Moore:

This letter is in response to Mr. G. Alan Farmer's letter of March 23, 1995, which was received on March 27, 1995. That letter enclosed the above referenced Complaint and Compliance Order.

The Coastal Systems Station (CSS) hereby requests an informal settlement conference in accordance with Section XIII of the Complaint and Compliance Order. We request such a conference so that we may have the opportunity to discuss with U.S. EPA representatives the appropriateness of the amount of civil penalty proposed for assessment. If convenient, we would like to schedule that conference for sometime during the week of April 17 1995.

By separate correspondence directed to Jeananne M. Gettle, I am also forwarding this date, the certification required under Section VII of the Complaint and Compliance Order. A copy of that certification is enclosed for your information as is a copy of your agency's March 24, 1995, RCRA compliance evaluation inspection report and March 7, 1995, revised corrective action management plan approval, evidencing CSS's current compliance status. This information is also being provided to Mr. Kellenberger and Mr. Kastury of the Florida Department of Environmental Protection.

Please advise at your earliest convenience when it would be possible to schedule the requested settlement conference.

Post-It™ brand fax transmittal memo 7871		# of pages	10
To	Steve Beverly	From	Cross
Co.		Co.	
Dept.		Phone #	436-4749
Fax #	563-0985	Fax #	436-4774

5726
Ser 051/028

You may contact either Mr. Steve Conway at (904) 234-4646 or Mr. Stephen Beverly at (803) 743-0708 in such regard.

Sincerely,


D. C. STEERE
Captain, U.S. Navy
Commanding Officer

Encl:

- (1) Complaint and Compliance Certification
- (2) EPA letter of March 24, 1995
- (3) EPA letter of March 7, 1995



DEPARTMENT OF THE NAVY
COASTAL SYSTEMS STATION DAHLGREN DIVISION
NAVAL SURFACE WARFARE CENTER
6703 WEST HIGHWAY 98
PANAMA CITY FL 32407-7001

IN REPLY REFER TO:

5090
Ser 051/028

77 APR 1995

Jeaneanne M. Gettle, Acting Chief
RCRA Compliance Section
Office of RCRA and Federal Facilities
Waste Management Division
U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30356

Re: Complaint and Compliance Order - Docket No. 95-02-R

Dear Ms. Gettle:

This letter responses in pertinent part to Mr. G. Alan Farmer's letter of March 23, 1995, which was received by this command on March 27 1995. That letter enclosed the above referenced Complaint and Compliance Order.

Please find enclosed the original of the compliance certification required to be submitted to you under Section VII of the Complaint and Compliance Order. I have also enclosed a copy of your agency's March 24, 1995, RCRA compliance evaluation inspection report and March 7, 1995, revised corrective action management plan approval, evidencing Coastal Systems Station's current compliance status. By copy of this letter, this same information is being provided to Mr. Kellenberger and Mr. Kastury of the Florida Department of Environmental Protection.

Should you have any questions concerning the certification please feel free to call Mr. Steve Conway at (904) 234-4646 or Mr. Stephen Beverly at (803) 743-0708.

Sincerely,



D. C. STEERE
Captain, U.S. Navy
Commanding Officer

Encl:

- (1) Complaint and Compliance Order Certification
- (2) EPA letter of March 24, 1995
- (3) EPA letter of March 7, 1995

CERTIFICATION

I hereby certify that to the best of my knowledge and belief, the Coastal Systems Station (CSS) is presently in compliance with all applicable requirements contained in its Resource Conservation and Recovery Act (RCRA) Part B permit and in 40 C.F.R. Parts 260-270.



D. C. STEERE
Captain, U.S. Navy
Commanding Officer

7 Apr 95

Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

MAR 24 1995

4WD-RCRA

CERTIFIED MAIL
RETURN RECEIPT REQUESTEDCaptain David C. Steere
Commanding Officer
USN Coastal Systems Station
Panama City, Florida 32407-5000SUBJ: RCRA Compliance Evaluation Inspection
EPA ID No.: FL8 170 023 792

Dear Captain Steere:

On March 9, 1995, the United States Environmental Protection Agency (EPA), along with the Florida Department of Environmental Protection (FDEP), conducted a compliance evaluation inspection at your naval research, development, test, and evaluation facility located in Panama City, Florida. The purpose of the inspection was to determine the facility's compliance with the Resource Conservation and Recovery Act (RCRA) and its hazardous waste storage permit.

Enclosed is the EPA RCRA Site Inspection Report which indicates that no violations of RCRA were discovered and it appears that your facility is in compliance with RCRA. A copy of this report has been forwarded to FDEP, pursuant to the State of Florida - EPA Memorandum of Agreement (MOA).

If you have any questions, please contact Kenneth R. Lapierre, of my staff, at (404) 347-3555 ext. 6393.

Sincerely,

Handwritten signature of Jeffrey T. Pallas in black ink.

Jeffrey T. Pallas, Chief
FL/GA Unit
RCRA Compliance Section

Enclosures

cc: Mr. Michael Redig, FDEP (w/o enclosures)
Mr. Ed O'Connell, FDEP - Northwest District

UNITED STATES ENVIRONMENTAL PROTECTION AGENCYRCRA SITE INSPECTION REPORTA. Inspector and Author of Report

Kenneth Lapierre
Environmental Engineer

B. Facility Information

United States Navy Coastal Systems Station (CSS)
Panama City, Florida 32407-5000

EPA ID #: FL8 170 023 792

C. Responsible Official

Captain David C. Steera
Commanding Officer

D. Inspection Participants

Kenneth Lapierre, EPA - RCRA Compliance Section
Ed Pike, FDEP - Northwest District
Barbara Coogle, - CSS - Hazardous Waste Manager
Don Green - CSS - Deputy Public Works Officer

E. Date of Inspection

March 9, 1995

F. Applicable Regulations

RCRA Section 3007
40 C.F.R. Parts 260-268
Florida Administrative Code (F.A.C.) 62-730.140 - 62.730.183
Hazardous Waste Storage Permit H003-184236

G. Purpose of Inspection

To determine Coastal System Station's compliance status with the Resource Conservation and Recovery Act (RCRA) and its hazardous waste storage permit dated October 23, 1990.

H. Facility Description

CSS is primarily a United States Navy research, test, development, and evaluation facility. CSS is located on the west shore of St. Andrews Bay, in Panama City, Florida and has operated at this location since approximately 1944. Major functional areas at CSS include a Dive School, an Experimental Dive Unit, a Landing Craft Air Cushion (LCAC)

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Support Facility, and a Mine Warfare Support Mission, in addition to the standard base functions such as the auto hobby shop and the fabrication building.

CSS generates hazardous waste at several locations throughout the facility and operates numerous satellite accumulation areas. CSS also operates a permitted hazardous waste storage area. The hazardous waste storage permit is dated October 23, 1990, and was issued by the Florida Department of Environmental Protection (FDEP). The permit allows CSS to operate a hazardous waste container storage facility with a maximum capacity of 3,300 gallons or 60 55-gallon containers. CSS is allowed to store caustics, halogenated organics, toxics, acids, ignitables, and non-hazardous waste.

I. Findings

The following areas were inspected: the permitted storage area, Bldg 323 (Mine Sled Building), Helicopter Ops, LCAC Operations, Building 431 (Fabrication Facility), Plastics Shop, Electric Shop, Paint Shop, Transportation Department, and the Underwater Equipment Lab. With the exception of the permitted hazardous waste storage area, CSS accumulates hazardous waste in satellite accumulation areas. All satellite accumulations areas appeared to be in compliance with RCRA.

In addition, the inspection team reviewed the following: hazardous waste manifests and land disposal restriction certifications, contingency plan, closure plan, hazardous waste training, waste analysis plan, hazardous waste management plan, and inspection records. All of the documentation reviewed appeared to be in compliance with RCRA and the hazardous waste permit. CSS has an exceptional program for providing hazardous waste training to contractors who perform work for the Navy at CSS. The facility hazardous waste manager has also developed an in-depth hazardous waste management plan (COASTSYSTA INSTRUCTION 5090.1A) which details CSS's hazardous waste training and management procedures.

J. Conclusions

As a result of this inspection, it appears that CSS is in compliance with RCRA, found at 40 C.F.R. Parts 260-270 and F.A.C. 62-730.140 - 62.730.183, and its hazardous waste storage permit.

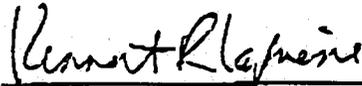
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K. Outbriefing

A formal outbriefing was given to representatives of CSS at the completion of the CEI, on March 9, 1995.

L. Recommended Action

Transmit a copy of this inspection report to the Florida Department of Environmental Protection (FDEP) pursuant to the EPA - State of Florida Memorandum of Agreement (MOA).

M. Signed

Kenneth R. Lapierre
Environmental Engineer

3-27-95

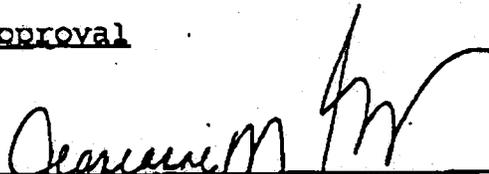
Date

N. Concurrence

Jeffrey T. Pallas, Chief
FL/GA Unit
RCRA Compliance Section

3-23-95

Date

O. Approval

Jeaneanne M. Gettle, Acting Chief
RCRA Compliance Section
Office of RCRA and Federal Facilities

3-23-95

Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30345

MAR 07 1995

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTEDCommanding Officer
Coastal System Station
Panama City, FL 32407-5000SUBJ: Corrective Action Management Plan
Coastal Systems Station, Panama City, Florida
EPA I.D. Number FL8 170 023 792

Dear Sir:

The U.S. Environmental Protection Agency (EPA) has reviewed the Corrective Action Management Plan (CAMP) Revision 1 for Coastal Systems Station, Panama City, dated February 1995. The CAMP is hereby approved. The CAMP should be kept with your Hazardous and Solid Waste Amendments (HSWA) portion of the Resource Conservation and Recovery Act (RCRA) Permit.

The CAMP schedule satisfies Condition II.B. SCHEDULES OF COMPLIANCE and portions of Condition II.A. ASSESSMENT OF NEED FOR CORRECTION ACTION of the HSWA portion of the RCRA Permit and replaces any previous compliance schedules for Naval Coastal Systems Station (NCSS). The approved CAMP becomes an integral component of the HSWA Permit.

Changes to the CAMP schedule (such as extensions for dates of submittals, addition of new SWMUs, etc.) will constitute an Administrative and informational change to the HSWA Permit and therefore requires a RCRA Class I permit modification as provided for in 40 CFR 270.42. Any permit modification approved by EPA should be kept with NCSS's HSWA Permit.

In accordance with the provisions of 40 CFR 270.42 (a)(ii), NCSS is required to notify all persons on the facility's mailing list of EPA's approval of any permit modification within ninety (90) days from the receipt of EPA's letter. This notification will include the approval of this amended CAMP schedule. Since 40 CFR 270.42 (a)(ii) specifies that such notifications are to be made after EPA approval has been granted, your notification should reference this letter.

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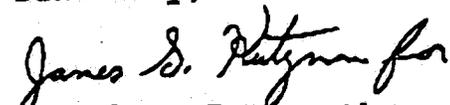
Copies of future document submissions should be sent to each of the following:

- 1) Mr. Joseph R. Franzmathes
Director
Waste Management Division
U.S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, Georgia 30365
ATTN: Federal Facilities Branch, DoD Remedial
Section - four copies or as directed

- 2) Mr. John Ruddell, Director
Division of Waste Management
Florida Department of Environmental Protection
Bureau of Waste Planning and Regulation
Twin Towers Office Building
2600 Blair Stone Dr.
Tallahassee, Florida 32399-2400
ATTN: Bureau of Waste Cleanup - two copies

Should you have any questions, please contact Mr. Craig A. Benedikt of the Federal Facilities Branch at (404) 347-3016 or 347-3555 ext. 6456.

Sincerely,


Joseph R. Franzmathes
Director
Waste Management Division

cc: Eric Nuzie, FDEP
David Clowes, FDEP
Mr. John Mitchell, FDEP
Mr. Jim Reed, SOUTHNAVFACENGCOM