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## Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

October 8, 1990

CERTIFIED - RETURN RECEIPT REQUESTED

N00204.AR.000164

NAS PENSACOLA

5090.3a

Captain T.W. Bone, CEC, USN  
 Commanding Officer  
 Navy Public Works Center  
 Naval Air Station  
 Pensacola, Florida 32508-6500

RE: Navy Public Works - Pensacola FL9 170 024 567  
 Closure Permit Application #HF17-170951  
 Escambia County  
 First Notice of Deficiencies  
 Class II Hazardous Waste Violations

Dear Captain Bone:

Your application for a hazardous waste permit has been reviewed and found to be incomplete. The required information and amendments necessary to complete your application are itemized in the attached Notice of Deficiencies.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the following additional information, pursuant to FAC Rule 17-730.220 and Chapter 403.0876 Florida Statutes (FS).

The deficiencies noted in the enclosed Notice of Deficiencies constitute a violation of Department rules. Failure to correct these deficiencies within thirty (30) days could subject you to formal enforcement action including monetary penalties. If you cannot submit this information within thirty (30) days, you must provide a schedule with dates when this information will be submitted. If a complete response to each item is not submitted within the timeframe given above, the Department will issue a Notice of Violation, begin the formal process to deny the permit pursuant to Section 120.60 FS, or take other appropriate actions.

You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response. If you would like to arrange a meeting or if you have any questions, please call me or Merlin Russell of my staff at 904/488-0300.

Sincerely,

Satish Kastury  
 Environmental Administrator  
 Hazardous Waste Regulation

SK/SG/do  
 Enclosures

cc: Jim Scarbrough, EPA/Region IV  
 Bill Kellenberger, DER/Pensacola  
 Robert Ernst RMP&R



FIRST NOTICE OF DEFICIENCIES  
NAVY PUBLIC WORKS  
FL9 170 024 567  
CLOSURE/POST-CLOSURE PEWIT APPLICATION HF17-170951

**GENERAL STATEMENT:** There appears to have been some confusion in the preparation of this document. While the application is required for post-closure care of the sludge drying beds and surge pond, information pertaining to closure of Building 71 and operation of Building 3691 was included. All information pertaining to the storage buildings must be deleted from the revised application. If post-closure for Building 71 is required, a post-closure permit application will be necessary for that unit. Moreover, the cover letter of the application gave instructions to incorporate sections of a previous operating permit (which has since expired), to be replaced as appropriate, with the current submittal. This is not acceptable. While the Department has stated that previously submitted information may be incorporated into the post-closure permit application, it is intended that such information be resubmitted. The post-closure application must be a stand-alone document. Consequently, a revised application, including all information required in a post-closure application, must be submitted.

1) **INTRODUCTION:** The statement that this submittal is to renew closure permit HF17-148989 is incorrect (although the Department understands the Navy's intent to renew the expired permit HF17-148989). Closure permit HF17-148989 has expired. This application must be a new application for a post-closure permit for the sludge drying beds and surge pond.

2) **TITLE PAGE:** This page is in error. This is not a "modification" (revision 3) of an application for post-closure. The operating permit and closure permits for the sludge drying beds and surge pond have expired. This page must be corrected.

**PART I:**

3) .A.1 The type of facility was designated incorrectly. The units for post-closure are disposal facilities (landfills), not storage facilities.

4) .A.8 Ed Pike is no longer the contact person. This correction must be made here and elsewhere throughout the application.

5) .A.18 The name, address and registration number of the professional engineer who prepared the application must be included.

- 6) B.5 The response is in error. An examination of a previously submitted flood map indicates that the Waste Management Areas (sludge drying beds and surge pond) are within the 100 year floodplain.
- 7) D.2 A brief description of the facility operations, etc. must be submitted. If this information is found elsewhere in the application, it must be referenced.
- 8) D.3 The response must be corrected to reflect that the units in question are landfills, although these units were not designed and operated as landfills. There must be an estimate of the capacity of each unit, along with the waste code describing the remaining wastes.

## PART II -A.- GENERAL:

- 9) .1.A. A topographic map fulfilling the requirements of this section was not included with the application. This map must be submitted (Appendix B-2 is not a topographic map).
- 10) .1.A. Figure D-1 refers to **the** storage facility. This is inappropriate for this post-closure application and must be deleted.
- 11) Page B-8: Figure E-3 was referenced for various data. Much of the information described does not appear in the figure (WMA, etc.). Appropriate changes in the application must be made.
- 12) .3.,  
Page B-11: Figure B-4 was referenced. This figure was not included in the application and must be submitted. Also, it should be noted that the units included in this application appear to be within the 100 year floodplain (see comment 6). This application is for the closed surge pond and sludge drying beds and not for the active hazardous waste storage building.
- 13) .4. Much of the information included in the application to fulfill the requirements of this section as contained in Sections F, G and H are for the operation of waste storage areas, not for post-closure of the land disposal units. These sections of the application must be revised or deleted as necessary so that the application addresses only post-closure of the surge pond and sludge drying beds.
- 14) .5. Was the list of wastes included in Section C, Table C-1 a list of **the** wastes that were emplaced (and still remain) in the hazardous waste disposal units? If not, this list should be revised to include only those wastes actually emplaced in these units. The waste analysis plan (pp. C-6, ff.) applies to the operation of the storage facility rather than to post-closure activities, and must be deleted.

- 15) .7., Section B This section **must be** revamped to include only the record keeping requirements, etc. needed for post-closure care of the land disposal units.

16) B - CONTAINERS:

Information submitted to complete the requirements of this section pertain to the operation and closure of the waste storage buildings (Building 3691), not to the land disposal units, and **must be deleted**,

17) G - LANDFILLS:

Most of the information required to complete this section is "N/A", since the units have been closed and are in post-closure. However, a list of wastes previously placed in these units, the estimated volumes of the existing units, a reference to the post-closure plan, and a copy of the notice in deed as required by 40 CFR Part 264.119 **must be submitted**.

K - CLOSURE:

- 18) - 1 - All references to the closure of Building 3691 **must be deleted**.
- 19) .1. All closure activities **associated** with the hazardous waste management areas have been completed. The closure plan, Section I-1, is not needed and **must be deleted**.
- 20) .2. All details of groundwater monitoring and corrective action **should be** included in the groundwater monitoring plan. Instead of the closure plan.
- 21) .2. The following comments pertain to the post-closure plan:
- a. I-2 The name, address and phone number of the person or office to contact **about** the hazardous waste disposal unit or facility during post-closure care **must be** included in the post-closure plan.
  - b. I-2c The ~~surface impoundments~~ for which post-closure care is required **must be** clearly identified.
  - c. The application must include a copy of the inspection form to be completed **by** the inspector.
  - d. Planned monitoring activities **must include** the security fence, gate and warning signs around the Water Management Area.
  - e. ✓ Planned monitoring activities **must include** inspection of the impoundment covers for development of low areas.

- f. Planned monitoring activities must specifically include inspection of the sludge drying bed asphalt cover for cracks or gaps.
- g. A description of planned maintenance activities including, but not limited to, periodic mowing and fertilizing of the surge pond cover and resealing the surge drying bed cover must be included.

**M - GROUNDWATER PROTECTION:**

- 22) .2. The geological description of the uppermost aquifer, any interconnected aquifers, and the confining unit in the submittal depended upon data in Appendices E-4, E-5 and E6 contained in the application for the expired operating permit for the Waste Management Units. All relevant geological data to support these descriptions (as contained in the aforementioned appendices) must be updated and re-submitted, as appropriate.
- 23) .2. No data were provided for groundwater flow rates. These data must be submitted. A description of seasonal fluctuations of groundwater flow rates and directions must also be submitted.
- 24) .2. Figure E-6: The date for the groundwater elevation data must be submitted.
- 25) .2. Figure E-5: This figure requires a legend. Do the lines from the surge pond represent vertical groundwater flow direction? If so, data substantiating the downward direction of groundwater flow in this area must be submitted. Any available data for the vertical groundwater flow in the vicinity of the sludge drying beds must also be submitted.
- 26) .2. The pumping effect of nearby wells on groundwater flow must be described.
- 27) .3. The proposed Waste Management Area is shown in Figure 1-2. The proposed WMA does not meet the requirements of 40 CH Part 264.95, which requires that the waste management area include the entire area in which wastes were emplaced (the surge pond and sludge drying beds). Moreover, the proposed Waste Management Area encompasses considerable area which was not used for waste emplacement. The proposed Waste Management Area must modified and resubmitted.
- 28) .3. Does monitoring well DG-3 remain in existence? A map showing the monitoring well locations submitted with the quarterly groundwater data for March - May, 1990 (dated July, 1990) does not include this well. However, page E-35

of the application does not indicate that the well **has** been destroyed or abandoned. This must be clarified. If the well is still usable, it must **be** incorporated into the POC well network upon modification of **the** Waste Management Area (see comment 27).

29) .4. Figure E-1 **was** submitted to **show** plume migration. No date was included. **This** figure must be modified and resubmitted

30) .4. Figure E-3 was referenced **as** a map showing the current plume dimensions. However, no actual plume delineation was included on this map. The map must **be** resubmitted. Moreover, the map designated contamination are **TOC** concentrations, in units of mg/l. The facility should understand that for cleanup purposes the plume of contamination for this site **must** include all specific organic contaminants in units of ug/l.

31) .5. **The** following comments apply to the groundwater monitoring plan:

- a. Information pertaining to **the** groundwater monitoring **plan was** included in the closure plan. That information **must be included** in **the** groundwater monitoring plan, which must **be** a stand alone document.
- b. The location map, (Figure I-2), must be resubmitted. The revised map **must** include a scale and orientation, and show **all** wells to be included in the groundwater monitoring network (Point of Compliance (POC) wells and assessment wells). This map **must** also clearly show **the** Waste Management Area(s) (See comment 27).
- c. Construction information **was** provided in Tables E-3 and E-4 and schematic diagrams of "typical" monitoring wells were provided in Figures E-8 and E-10. However, individual construction diagrams of each monitoring well **must be** submitted [17-730.900(2)Part II.M.10.b, FAC]. (The Department is aware that some of this information may not be available for the older wells.)
- d. Detailed lithologic logs for all borings made for the construction of monitoring wells and recovery wells **must be** submitted.
- e. **The** list of constituents on page 1-4 is insufficient. All previously **detected** constituents as well as all newly detected constituents found in Appendix IX sampling must be sampled for quarterly in all POC and background wells.

- f. A QAP has been submitted to the Department for review. Comments on this document are forthcoming.
  - g. The proposed sampling plan, including wells, parameters, and frequencies must be re-submitted and updated, as necessary.
- 32) .8. The description of the corrective action program must be re-submitted. This must include a description of the recovery wells, including the final construction diagrams of each well, a description of the treatment procedures, and procedures for determining the effectiveness of corrective action, including assessment wells to be sampled. It must also include a description of the contamination plume.
- 33) .8. The proposal to continue groundwater recovery "until groundwater meets state groundwater guidance for organic compounds" is unacceptable at *this* time. Corrective action must be maintained as long as the groundwater protection standard (which is the minimum detection level for organic constituents) is exceeded in the POC wells. The facility does have the option to apply for Alternate Contamination Limits, which, upon acceptance, would be incorporated into the GWPS.
- 34) .8. The facility proposed to shut off recovery wells RW-1, RW-2 and RW-3 (Page 1-4). It is acceptable to shut off wells RW-1 and RW-2. However, these wells must be maintained to allow for immediate operation, if needed. If contaminants are detected in assessment wells in the vicinity of RW-1 and RW-2, those recovery wells must be immediately restarted. Recovery well RW-3 must continue to operate,