



DEPARTMENT OF THE NAVY  
NAVY PUBLIC WORKS CENTER  
NAVAL AIR STATION  
PENSACOLA, FLORIDA 32508-6800

32501.000  
03.01.00.0020

5090

Code 400B

MAR 21 1991

N00204.AR.000202

NAS PENSACOLA

5090.3a

Mr. Arthur G. Linton, P.E.  
Regional Federal Facilities Coordinator  
Federal Activities Branch  
U.S. Environmental Protection Agency  
Region IV  
345 Courtland Street, N.E.  
Atlanta, GA 30365

Ret 1991 FEDERAL FACILITIES ENVIRONMENTAL COMPLIANCE PROFILE

Dear Mr. Linton:

In response to your correspondence of 22 January 1991, a 1991 Environmental Compliance Profile is provided for the Pensacola Naval Complex. As agreed by Ms. Nancy Redgate of your staff and my environmental coordinator, LT Ken Alexander, in their telephone discussion of 12 March 1991, a profile for all U.S. Navy activities in the Pensacola area is provided.

It is not possible to limit the Pensacola Navy's environmental compliance picture to the Pensacola Naval Air Station. There are numerous regulated activities and facilities on Naval installations throughout Pensacola. For example, NPWC Pensacola owns and operates permitted air emissions sources and fully regulated drinking water and wastewater facilities on NAS Pensacola, NTTC Corry and NETPMSG Saufley. In accordance with instructions from the Chief of Naval Operations, the Commanding Officer of each Naval shore installation is responsible for environmental compliance for all activities and facilities under their direct cognizance.

NPWC Pensacola has coordinated this response with the activity environmental coordinators representing the Commanding Officers of the activities listed on page 1 of this submission.

Point of contact for this compliance profile is Mr. Greg Campbell, (904) 452-2170/4728.

Sincerely,

T. W. BONE  
Captain, CEC, USN  
Commanding Officer

Encl:  
Environmental Compliance  
Profile



**NAME:** Pensacola Naval Complex:

Naval Air Station (NAS) Pensacola  
Naval Aviation Depot (NADEP) Pensacola  
Navy Public Works Center (NPWC) Pensacola  
Naval Supply Center (NSC) Pensacola  
Naval Technical Training Center (NTTC) Corry Station  
Naval Education Training Program Support Activity  
(NETPMSA) Saufley Field  
Naval Hospital (NAVHOSP) Pensacola

**LOCATION:** Pensacola, FL

**I.D.:** FL1170024567

**MISSION:** Naval Air Station Pensacola provides support for Naval Aviation Training. NAS Pensacola has three major industrial tenants, NADEP Pensacola, NPWC Pensacola and NSC Pensacola, who provide aircraft maintenance/rework, public works and logistical services to NAS Pensacola as well as numerous Navy and DOD activities beyond the boundaries of NAS Pensacola.

NTTC Corry provides technical training to the Navy and other DOD components in the areas of electronics, computers and communications.

NETPMSA Saufley provides technical program support to all phases of enlisted personnel advancement training. The Saufley Federal Prison compound is a major tenant.

**AREA:**

NAS Pensacola -	6,684 acres
Corry Area -	604 acres (1)
NETPMSA Saufley -	<u>1,419 acres</u>
TOTAL -	8,707 acres

**POPULATION:**

NAS Pensacola -	16,800 (2)
(daytime) NTTC Corry -	6,759 (3)
NETPMSA Saufley -	<u>1,592 (4)</u>
TOTAL -	25,151

- (1) Includes NTTC Corry, Naval Hospital Pensacola, Corry Navy Housing and PX/Commissary
- (2) Includes 2,200 Family Housing residents
- (3) Includes 800 Family Housing residents, Naval Hospital personnel and Commissary/PX employees
- (4) Includes 575 Federal Prisoners at Federal Prison Complex

## COMPLIANCE STATUS

**CIIR:** NAS Pensacola has one (1) permitted air emissions source, a confidential material incinerator. This source passed FDER inspection on February 1991 and is in compliance. NADEP Pensacola currently has eight (8) permitted air emissions sources, all boilers. All eight sources passed FDER inspections in November 1990 and are in compliance. NPWC Pensacola has nine (9) permitted air emissions sources. Five of these permitted sources are located on NAS Pensacola. One source is at Naval Hospital Pensacola, another at NTTC Corry and another at NETPMSA Saufley. The ninth source is located in downtown Pensacola, but will cease to operate once the USS Lexington begins decommissioning. All nine sources passed FDER inspections in November 1990 and are in compliance.

Naval Hospital Pensacola has one (1) permitted air emissions source, a pathological incinerator. This source was inspected in September 1990 and is in compliance.

NPWC Pensacola and FDER signed a consent agreement in September 1990 for a state clean air violation (asbestos release) that has since been corrected. Terms of agreement call for payment-in-kind in the form of constructing a public nature trail on Naval Air Station Pensacola.

**WCITER:** NPWC Pensacola owns and operates three (3) fully regulated public water systems serving NAS Pensacola, NTTC Corry/Naval Hospital and NETPMSA Saufley. All water is pumped from wells (ten at NTTC Corry, two (2) at NETPMSA Saufley) and treated prior to distribution. Treatment consists of pH adjustment, corrosion inhibitors with zinc orthophosphate (NAS Corry) or sodium hexametaphosphate (Saufley), disinfection and fluoridation (NAS/Corry only).

NPWC Pensacola and FDER signed a Memorandum of Agreement in October 1990 regarding the presence of the pesticide dieldrin in wells at NTTC Corry. The Navy does not acknowledge the state's authority to regulate dieldrin which is monitored as an unregulated organic compound under Florida drinking water regulations. However, a mutual agreement was developed to establish a plan of action for treatment to remove dieldrin with granular activated carbon (GAC) system. GAC treatment system is scheduled for completion in June 1991.

**WATER:** (continued) State drinking water regulations require cross-connection control. Backflow prevention devices are scheduled to be installed on all three public water systems by the end of 1992.

All other elements of the three regulated drinking water systems are in substantial compliance with state drinking water regulations. Last FDER inspection was held December 1990.

**WASTEWATER:**

NAS Pensacola A single NPDES permit (FL0002500) is issued for for all discharges from NAS Pensacola. This permit is effective until August 1994 and includes:

a. 4.0 mgd domestic/industrial wastewater (DW/IW) treatment plant owned and operated by NPWC Pensacola.

b. Once through cooling water discharge from (now-inactive) NPWC owned/operated steam powered electrical generation plant.

c. Five industrial stormwater outfalls located throughout NAS Pensacola.

NPWC Pensacola holds a state operating permit (I017F00625) for the 4.0 mgd DW/IW treatment plant which is to be renewed in June 1991.

EPA issued a notice of violation (NOV) in August 1990 for exceeding silver discharge limits at the DW/IW treatment plant. Problem was corrected in August 1990 and no further regulatory action was necessary NPWC Pensacola is pursuing development of a pre-treatment program to help preclude a recurrence of this problem.

Corry Naval Complex (includes NTTC Corry, Naval Hospital Pensacola and Corry Family Housing):

**STORMWATER:** NPDES permit (FL0037427) expired in August 1982 and is now inactive. NPWC Pensacola provides quarterly monitoring reports to EPA verifying no stormwater discharges occur above the thresholds established by the expired NPDES permit. Initial guidance from EPA Region IV indicates this permit will not require renewal.

**DOMESTIC SEWAGE:** A publicly owned treatment works (POTW) discharge permit, 1016.90, issued by Escambia County Utilities Authority (ECUA) to NPWC Pensacola, regulates sanitary sewage discharges from the Corry area to ECUA's POTW. NPWC is in compliance with the terms of the POTW discharge permit.

NETPMSA SAUFLEY

STORMWATER: NPDES permit (FL0037435) expired in August 1986 and is now active. NPWC Pensacola provides quarterly monitoring reports to EPA verifying no stormwater discharges occur above thresholds established by the expired NPDES permit. Renewal of this permit under revisions to 40 CFR Parts 122, 123 and 124 is pending further guidance from EPA Region IV.

DOMESTIC SEWAGE: NPWC Pensacola owns and operates a 0.21 mgd trickling filter for treatment of domestic sewerage from NETPMSA Saufley (including FPC Saufley). NPDES permit FL0021041 was issued to NPWC Pensacola to operate this plant, but expired in May 1989. EPA letter dated August 1989 extended the permit indefinitely. A state operating permit (D017-117946) is also issued for this facility which expires in September 1991. NPWC Pensacola is in compliance with the terms of the current NPDES and state operating permits.

UST's:

NAS Pensacola

Underground storage tanks located within the boundaries of NAS Pensacola and regulated under 40 CFR 280 and Florida Administrative Code (FAC) 17-761 are listed below.

NAS Pensacola	24
NADEP Pensacola	10
NPWC Pensacola	1
NSC Pensacola	6 (Bulk fuel storage)
TOTAL	41

All but four of NAS, NADEP and NPWC tanks meet new UST design criteria specified in 40 CFR 280 and FAC 17-761 including leak detection, overflow protection and double wall piping. Of the four tanks not meeting the new UST criteria, one has a leak detection system consisting of 4 monitoring wells sampled monthly, three have leak detection systems consisting of annual tank tightness testing and tank inventory control.

Corrv Complex

One underground storage tank is regulated under 40 CFR 280 and FAC 17-761. This tank has four monitoring wells for leak detection, along with a monthly tank inventory requirement. Another tank is regulated only under FAC 17-761 and is presently in compliance, but will eventually require upgrades for spill containment (in 1992) and corrosion protection (in 1995).

## NETPMISA Sauf 1ey

Four UST's are regulated under 40 CFR 280 and Florida Administrative Code (FAC) 17-761. These tanks do not meet new UST design criteria. One UST has leak detection system consisting of four groundwater monitoring wells which are sampled monthly. Leak detection system for the other three tanks consist of both annual UST tightness test and UST inventory control.

## **RCRA:**

### NAS Pensacola

A RCRA operations and maintenance groundwater monitoring inspection was conducted by FDER on November 8, 1990. Results of inspection report have not been received from FDER to date. EPA Part "B" permit for SWMU's was issued and became effective on August 26, 1988. An operating permit (FDER permit number H017-162280) was issued by FDER, effective June 19, 1989 for the conforming storage building (Building 3691) for NPWC hazardous waste storage. A Class I permit modification was submitted to EPA Region IV on October 15, 1990. This permit modification requested the storage of 25 additional Toxic Characteristic parameters which are currently managed under different EPA hazardous waste numbers at the existing hazardous waste storage facility (Building 3691), but under different EPA hazardous waste numbers than those listed in TC rule. EPA Region IV notified NPWC that the Class I permit modification was incomplete on January 30, 1991. A revised Class I permit modification was resubmitted on February 19, 1991.

Closure of NPWC's temporary hazardous waste storage facility (Building 71) was certified closed in accordance with FDER closure permit (permit number HF17-16197) by an independent registered professional engineer on February 11, 1991. This certification was submitted to FDER on February 14, 1991.

Closure of four surface impoundments at the industrial wastewater treatment plant - the surge pond, sludge drying beds, stabilization pond, polishing pond have been certified closed in compliance with FDER closure permits by an independent professional engineer in 1988-1989. Installation of aboveground surge tanks to replace the surge pond was completed in May 1989. A groundwater recovery system at the Wastewater Treatment Plant has been in operating since January 1987. Operation of this system is controlled under the FDER surge pond operating permit.

Post-Closure permit application for the surge pond and sludge drying beds was resubmitted on August 9, 1990 as requested in February 1990 meeting with FDER. First Notice of Deficiencies on post-closure permit application received from FDER on October 8, 1990. Post-Closure permit application for the surge pond and sludge drying beds was resubmitted to FDER on February 28, 1991.

#### Corry Area

NTTC Corry and Naval Hospital Fensacola are conditionally exempt small quantity hazardous waste generators (< 100 kg/ma).

#### NETPMSA Sauf 1ey

In compliance. Hazardous waste generation is < 100 kg/ma. Activity is a conditionally exempt small quantity generator.

#### **CERCLA:**

#### NAS Pensacola

Pensacola Naval Air Station was placed on the National Priorities List (NPL) in December 1989. The A/E firm Ecology and Environment has been contracted to perform the remedial investigation/feasibility study (RI/FS). The work plans for the RI/FS were approved by Florida Department of Environmental Regulation (FDER) and the Environmental Protection Agency (EPA) in October 1990. Also in October 1990, a Federal Facilities Agreement (FFA) was signed by the Navy, EPA and FDER to establish the framework for developing, implementing and monitoring response actions at NFL sites. The first phase of RI field work was completed in March 1991 with a report of the results of that field work due to the Navy in mid April.

#### NTTC Corry

Preliminary investigation is scheduled for 1991.

#### NETPMSA Sauf 1ey

Preliminary investigation is scheduled for 1991.

#### **TOXICS:**

#### NAS Pensacola

In compliance. All PCB transformers are scheduled for removal or declassification prior to 1994. A retrofill process is underway for seven transformers scheduled for completion by the end of 1991.

## Corry Complex

In compliance. All PCB transformers are scheduled for removal or declassification prior to 1994. A retrofill process is underway for twelve transformers scheduled for completion by the end of 1991.

## NETPMSA Saufley

In compliance. Two PCB contaminated transformers are scheduled for replacement by 1994.

## NAS Pensacola

### **POLLUTION CONTROL:**

Hazardous waste minimization is employed by all HW generators through product substitution, waste segregation and process modifications. Hazardous waste generation from the NAS Pensacola installation decreased from 1,917 tons in 1989 to 1,315 tons in 1990, a 31% reduction. Over 1,000 tons of solid waste were recycled in 1990 covering materials that included aluminum, paper, cardboard, glass, plastic, rubber, copper, steel and wood. 11,688 pounds of spent 1,1,1 trichloroethane was recycled in 1990 using a distillation unit. 54,719 gallons of waste oil was donated to Auburn University waste oil recycling program in 1990.

## NTTC Corry

More than two tons of aluminum cans were collected for recycling in 1990.

## NETPMSCI Saufley

aluminum cans and computer paper are collected for recycling.

### **ENVIRONMENTAL AUDIT:**

NPWC Pensacola conducted a full multi-media environmental audit in 1990. Facilities and programs covered by the NPWC audit include:

- Two wastewater treatment facilities (NAS and Saufley)
- Hazardous waste collection, storage and transfer operations
- PCB management
- asbestos management
- Three drinking water systems
- Pesticide management
- Air emissions (NPWC sources only)
- Stormwater management
- Solid waste management
- RCRA closure actions
- Construction permits

Audit team was lead by LT Ken Alexander, NPWC Environmental Coordinator, and team members were as follows:

Ed Pike, former NPWC Environmental Division Director  
Greg Campbell, NPWC Environmental Division Director  
LT Paul Mullins, NPWC Environmental Engineer  
Gene Taylor, NPWC Safety Officer

**PROBLEM AREAS:** None

**ACTIONS NEEDED:**

NAS Pensacola

Post-Closure permit for the wastewater treatment plant surge pond and sludge drying beds pending. EPA approval pending for Class I permit modification to allow the storage of 25 additional TCLP parameters at NPWC's hazardous waste storage facility. Annual tank tightness tests required for three UST's in 1991. Install backflow prevention devices on public water system. Develop a pretreatment program for NPWC IW/DW treatment and collection systems. Renew state operating permit for IW/DW treatment plant in 1991. Submit final (CERCLA) Phase I interim data report and final Phase II work plans.

Corry Area

Complete installation of GAC treatment for public water systems serving Corry and NAS. Install backflow prevention devices on public water system. Conduct preliminary CERCLA investigation in 1991/92.

NETPMSA Saufley

Three UST's need annual tank tightness tests in 1991. Submission of NPDES stormwater permit application in 1991. Install backflow prevention devices on public water system. Renew state operating permit for sewage treatment plant in 1991. Conduct preliminary CERCLA investigation in 1991/92.

**CONTACT:** Mr. Greg Campbell  
Environmental Division Director  
Code 480  
Navy Public Works Center  
Building 3691 NAS  
Pensacola, FL 32508-6500

Phone: (904) 452-2170/4728  
Fax: (904) 452-2387