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COMMONWEALTH of VIRGINIA

WILLIAM L. WOODFIN, JR.
DIRECTOR

DEPARTMENT OF WASTE MANAGEMENT

MAR 10 1992

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Ms. Cherryl F. Barnett
Director, Environmental Programs
Norfolk Naval Base
Atlantic Division
Norfolk, Virginia 23511-6002

Subject: Landfill Closure
Permit No. 286

Dear Ms. Barnett:

It has been noted in two documents that hazardous waste has been disposed in the above noted construction debris landfill. The documents, "Draft Expanded Site Investigation Report, CD Landfill" prepared by Environmental Science & Engineering, Inc., dated August, 1991 and "Draft Site Investigation (SI) and Risk Assessment, CD-Landfill" prepared by Environmental Science & Engineering, Inc., dated November, 1990, were both written for the Atlantic Division, Naval Facilities Engineering Command.

The hazardous waste that was noted as disposed in the landfill consisted of sandblasting grit that tested EP Toxic for cadmium (D006) and spent rice hulls that also tested EP Toxic for cadmium (D006). It is stated that the sandblasting grit was placed in the landfill until 1981 and the spent rice hulls was placed in the landfill until 1983. Since the disposal of the EP Toxic wastes (D006) occurred after November, 1980 and the landfill did not close by July 26, 1982, the landfill is considered a regulated unit under the Virginia Hazardous Waste Management Regulations (VHWMR) and EPA's authorities under the Hazardous and Solid Waste Amendment of 1984 (HSWA).

The disposal of hazardous waste in any solid waste landfill is a violation of the Virginia Solid Waste Management Regulations as well as the VHWMR. There are also several VHWMR and HSWA issues, such as failure to provide the Part B permit application for this unit in accordance with VHWMR §11.3.E.1. and failure to provide groundwater monitoring as required under VHWMR §9.5.

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The closure of the CD landfill must be completed under the VHWMR as a hazardous waste landfill with all the requirements of the VHWMR, including groundwater monitoring and post-closure care permit.

This matter is being referred to the Compliance/Enforcement Section of the Department for resolution. If you have any questions, please contact me at (804) 371-2982 or Mr. John Ely at (804) 786-3063.

Sincerely,



Howard R. Freeland, CPG
Environmental Program Manager

cc: John Ely - DWM
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