



DEPARTMENT OF THE NAVY

NAVAL AIR STATION
JACKSONVILLE, FLORIDA 32212-5000

NAS Jacksonville Administrative Record
Document Index Number

32212-000
19.01.00.0034

6280
Code 184

FEB 1 1990

Mr. Harry Desai
U.S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365

Dear Mr. Desai:

The purpose of this letter is to clarify a site listing discrepancy between our Resource Conservation and Recovery Act (RCRA)/Hazardous and Solid Waste Amendments (HSWA) permit and our Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)/Installation Restoration Program (IRP). Sites numbered 1 through 38 are identical for both the RCRA/HSWA permit list and the CERCLA/IRP list. However, although both lists contain 40 sites, sites numbered 39 and 40 differ in each list. The CERCLA/IRP list includes Site 39 - Transformer Burial Area, and Site 40 - Industrial Wastewater Discharge Area. The RCRA/HSWA permit list includes Site 39 - Municipal Waste Sludge Drying Beds and Site 40 - Polishing Pond for Wastewater Treatment System Effluent.

Some historical information on the IRP may be useful in understanding this discrepancy. During the Initial Assessment Study (IAS) of the Naval Assessment and Control of Installation Pollutants (NACIP) Program (now the IRP), 38 sites were identified, and several were recommended for additional investigation. During this investigation known as the Verification Study, two more sites were identified. These two sites are the Transformer Burial Area and the Industrial Wastewater Discharge Area (IRP Sites 39 and 40, respectively).

On April 29, 1986, representatives from the Navy, U. S. Environmental Protection Agency, Florida Department of Environmental Regulation, and Jacksonville Bio-Environmental Services Division conducted a NACIP Review Workshop. Most of the information contained in Attachment B, the RCRA Facility Assessment, of the RCRA/HSWA permit is the handout provided at that meeting. Consequently, Attachment B refers to sites 39 and 40 as the Transformer Burial Area and the Industrial Wastewater Discharge Area, respectively.

However, Attachment D of the RCRA/HSWA permit refers to sites 39 and 40 as the Municipal Waste Sludge Drying Beds and the Polishing Pond for Wastewater Treatment System Effluent, respectively. As a result, an inconsistency exists not only between the RCRA/HSWA permit list and the CERCLA/IRP list but also within the RCRA/HSWA permit itself. Accordingly, it appears that

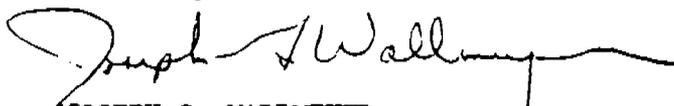
the RCRA/HSWA permit should be modified to correct these inconsistencies and that two additional sites be added to the CERCLA/IRP list. To facilitate these modifications, we suggest the following site numbers and names be used:

- Site 39 - Transformer Burial Area
- Site 40 - Industrial Wastewater Discharge Area
- Site 41 - Municipal Waste Sludge Drying Beds
- Site 42 - Polishing Pond for Wastewater Treatment System Effluent

On January 8, 1990 Naval Air Station, Jacksonville was issued a closure permit (Number HF16-144281) for the Domestic Waste Sludge Drying Beds and the Polishing Pond by the Florida Department of Environmental Regulation. Closure Permit conditions require many actions in a relatively short time. If included in the CERCLA/IRP, some of these actions cannot be accomplished within the allotted time as required by the Closure Permit (e.g., regulatory review, public participation, etc.). Hopefully, when the Federal Facility Agreement is finalized, CERCLA and RCRA will be fully integrated and this apparent problem will no longer exist. In the meantime, Naval Air Station, Jacksonville fully intends to comply with the Closure Permit conditions.

We appreciate your cooperation in this matter and look forward to hearing from you. If you have any questions or need additional information, please contact Mr. Tim Curtin of the Environmental Division at (904) 772-2717.

Sincerely,



JOSEPH G. WALLMEYER
Director, Environmental Division
By direction of the Commanding Officer

Copy to:

Mr. Eric Nuzia, FDER, Tallahassee
Mr. Ashwin Patel, FDER, Jacksonville
Ms. Nancy Dean, U.S. EPA, Region IV