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LETTER TRANSMITTING QUESTIONS BROUGHT UP DURING PARTNERING TEAM
MEETING REGARDING RCRA ACTIVITY ISSUES NAS JACKSONVILLE FL
7/13/1994
ABB ENVIRONMENTAL



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ON JULY 18, 1994 DAVE LANCASTER CALLED TO STATE THAT AS THE GUES ON THE PLATING SHOP & HANGAR 1000 WERE A. PATEL'S DIRECT RESPONSIBILITY, SHE WANTED TO PULL THEM FROM THE 7/25/94 MEETING. ASKED HER TO FAX A COPY OF THIS DEC. TO PATEL TO SOLICIT HIS RESPONSE TO THE POSED QUESTIONS.

July 13, 1994

Mr. Eric Nuzie
Federal Facilities Coordinator
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: RCRA Related Questions

Dear Eric:

At the request of Jorge Caspary we have prepared the following questions specific to various RCRA issues that have surfaced during discussions within the Partnering Team and during preparation of various regulatory documents. It is our understanding that they will be passed along to your RCRA group, who will use them as a basis for a question and answer session on July 25, 1995 in Tallahassee.

OU1

Background:

The OU1 remedial investigations are still in progress and response actions are still speculative. It is likely, however, that solid media such as soils and sediments may be consolidated from various portions of OU1 and temporarily stored on-site before final treatment and disposal are complete. Temporary storage would be accomplished in a manner protective of human health and the environment.

Questions:

- Would the temporary storage of solid media on-site, pending its final treatment and disposal, require the designation of OU1, or a portion thereof, a Temporary Unit (TU) and/or Corrective Action Management Unit (CAMU) under RCRA?
- Would the designation of OU1 as an Area of Contamination (AOC) under CERCLA meet the substantive requirements of RCRA for TUs and CAMUs?

OU2: PSCs 41, 42, AND 43

Background:

PSCs 41, 42, and 43 at OU2 are considered RCRA Hazardous Waste Units and are under a RCRA permit for closure. The Federal Facilities Agreement states that these Units will undergo CERCLA investigation and remedy and that RCRA will be considered an ARAR. The closure permit for these Units will be modified to reflect the final remedy selected in the Record of Decision.

Interim Remedial Actions (IRAs) are proposed for these Units. Pursuant to Alternative 6 (FRI/FS, December 1993) for PSC 41 and 43 waste would be excavated and treated to below LDR as presented in Table 268.41 CCWE. A no migration waiver would not be required to fulfill Minimum Technology

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Requirements (MTRs), i.e., no liner would be required prior to the placement of the fixated soils due to fact that RCRA considers the AOC (as included in the ROD or IROD) equivalent to an existing permitted landfill. Therefore, the intent of the LDRs would be met through onsite disposal at the AOC.

Question:

- Would the Interim Record of Decision (IROD) for the IRAs at these Units be acceptable as the decision document for the modification of the RCRA Closure Permit, or would permit modification need to wait for the final OU2 ROD?
- What is FDEP's position with respect to the above interpretation of the no-waiver issue? ABBES has based its no-waiver position on a July 7, 1994 discussion with Judy Sophianopolous, EPA Region IV, RCRA Branch.
- The Federal Facilities Agreement (Part VII, Para A) requires RCRA permit modification for final **remedial actions**. As the solidification of the sludge drying bed media is considered an interim remedial action, could it be agreed upon that a RCRA permit modification is not required?
- Can water from the polishing pond be pumped to the Navy Owned Treatment Works through a **Black Box** pretreatment? If the contamination levels are below pretreatment standards, is pretreatment required?

OU3: Building 101 - Old Plating Shop

Background:

Process tanks, piping, and associated appurtenances are being removed from the Old Plating Shop under a RCRA Closure Permit. The remaining portion of the Old Plating Shop is intended to be demolished. Hazardous materials including contaminated building debris and environmental media (e.g., soils) are being removed as a CERCLA response action, with RCRA considered as an ARAR. The Old Plating Shop is also a part of a PSC in OU3.

Question:

- Will the requirements in the RCRA Closure Permit Application be achieved once the successful removal of the tanks, piping, and associated appurtenances are complete?
- Are there any remaining RCRA Closure Permit requirements once the tanks, et al, are removed that apply to future CERCLA responses for the remaining hazardous wastes and substances at the Old Plating Shop? (RCRA is still applied as an ARAR of course).
- Since the Old Plating Shop is within the boundary of OU3 and is considered part of a PSC, will long-term CERCLA groundwater restoration and monitoring at OU3 satisfy the substantive requirements of RCRA and the permit? What procedural permit requirements will remain, if any?

HANGAR 1000

Background:

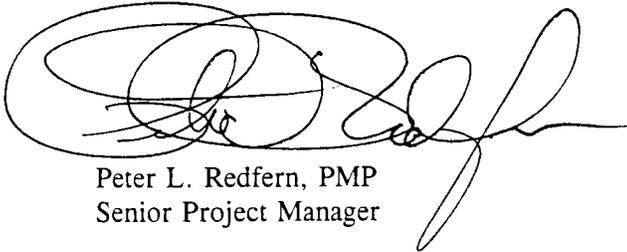
The waste solvent tanks have been removed from this location. In addition, the associated solvent drain piping will be removed. All of which will be conducted under a RCRA Closure Permit Application for Hangar 1000. Risk based cleanup levels for this site have been established for soil and groundwater. The issues at the Old Plating Shop and Hangar 1000 are similar.

Questions:

- Will the closure permit be considered satisfied once the physical removal of the tanks and decontamination of the associated piping are complete?
- Can long-term groundwater restoration and monitoring be conducted as a CERCLA response and meet the substantive requirements of RCRA and the permit?
- What procedural permit requirements will remain, if any?

Should you have any questions pertaining to the above, please call me at 904-269-7012, Ext. 117.

Very truly yours,
ABB ENVIRONMENTAL SERVICES, INC.



Peter L. Redfern, PMP
Senior Project Manager

cc: NAS Jacksonville Partnering Members
file

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