Department of Defense
RCRA Part B Permitted Facilities

A Key Part of our National Security Mission

March 9, 2015
Independent Review Panel

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Navy Region Southwest
Government Affairs

DoD Part B Facilities in California

- Provide critical support for nuclear aircraft carriers homeported in San Diego
- Provide critical support for R&D work in California
  - Support United States and allied governments
  - Necessary part of safe disposal of research materials
  - Support for training (EOD & UXO)
- Allow for efficient storage and disposal to minimize transportation impacts to surrounding communities

Military Perspective on the RCRA Permit Renewal Process

- Process is long & arduous irrespective of:
  - Compliance history
  - Permit complexity
  - Scope/breadth of facility
- Each renewal takes numerous years to complete
  - No clear accountability for delays

Military RCRA Part B Permits – Effective and Expiration Dates from Envirostore

EPA ID	FACILITY_NAME	PERMIT EFFECTIVE DATE	PERMIT EXPIRATION DATE	TYPE
CA9570025149	DEPT OF AIR FORCE VANDENBERG AFB	05/06/2008 (OP)	05/05/2018 (OP)	TREATMENT
CA1570024504	EDWARDS AIR FORCE BASE	11/07/2005 (OP)	11/07/2015 (OP)	TREATMENT
CA7170090016	NAVAL AIR STATION NORTH ISLAND	07/25/2010 (OP)	07/24/2020 (OP)	TREATMENT
CA2170023152	NAVAL AIR WEAPONS STATION CHINA LAKE	08/08/2001 (OP)	08/07/2011 (OP)	TREATMENT
CAR000019430	NAVAL BASE CORONADO MIXED WASTE STOR/	02/03/2015 (OP)	02/02/2025 (OP)	STORAGE
CA6170024289	NAVAL STATION SAN DIEGO	07/27/2006 (OP)	07/26/2016 (OP)	STORAGE
CA5570024575	TRAVIS AIR FORCE BASE	01/19/2008 (OP)	01/19/2018 (OP)	STORAGE

- Military facilities have a total of 7 RCRA Part B permits in CA.
- NAS North Island Mixed Waste Storage Facility renewal application completed in 7 years
- NAWS China Lake's renewal application still pending after 5 years
- EnviroStor shows numerous permit modifications and inspections.
  - Incomplete transparency due to lack of uploaded documents.

NASNI Mixed Waste Facility: A single storage building

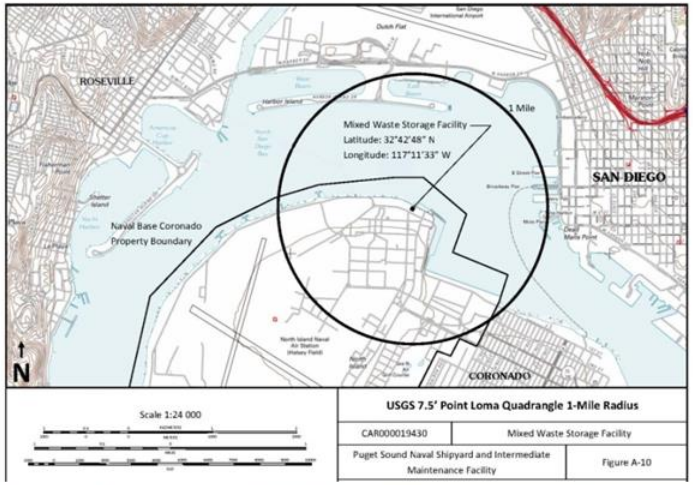
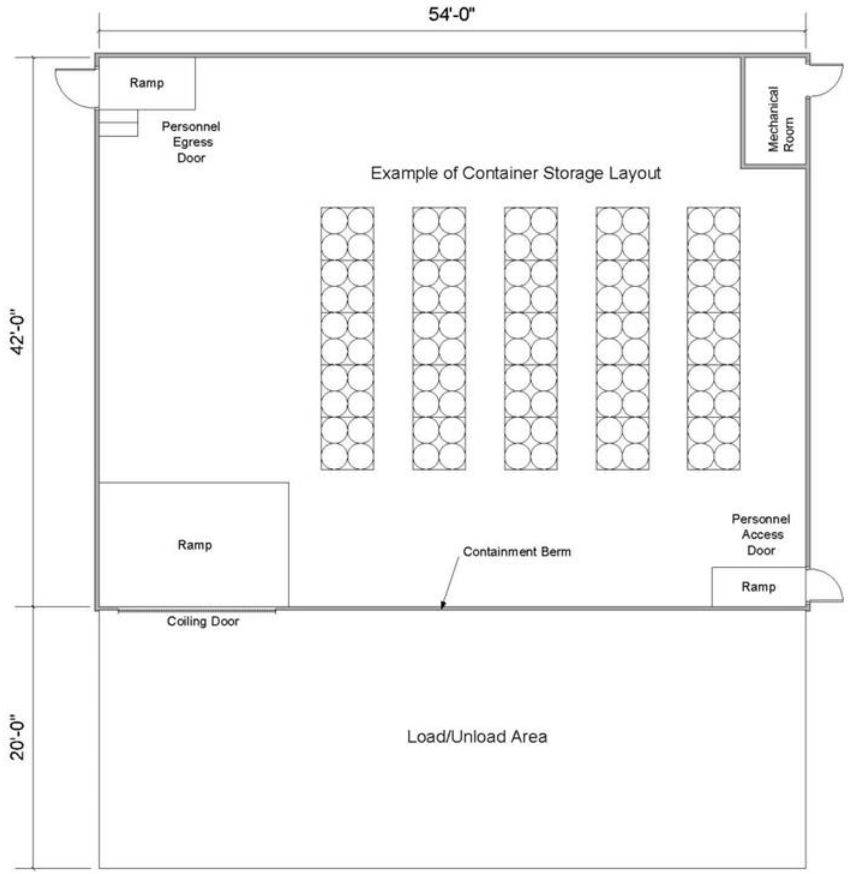


Photo Source — Bing Maps, February 2014

Figure B-3: Mixed Waste Storage Facility



Scale: 1" = 10' - 4"

NASNI Mixed Waste Permit History

MWF had no changes to the operations yet the renewal application took 7 years to complete.

One NOD was corrected within 6 weeks

On December 20, 2007, PSNS & IMF submitted an application to renew its hazardous waste facility permit. DTSC found the application to be timely and complete. State and federal law allowed PSNS & IMF to continue to operate under the terms of the 1998 permit until DTSC made a final decision on PSNS & IMF's application. DTSC conducted a comprehensive review of the MWSF application to renew the permit and found it to be complete. DTSC announced a draft permit decision in a public notice issued on September 22, 2014. The public notice declared the start of a 45-day public comment period and solicited comments on the Draft Permit. Copies of a fact sheet were mailed to the facility mailing list. A paid public notice announcing the public comment period was aired on a local radio station and DTSC published a public notice in the San Diego Union Tribune.

DTSC made a final decision to issue the hazardous waste facility permit on December 31, 2014. The permit became effective on February 3, 2015.

Permitted Units - Completed Activities UNIT FILTER: All Units

UNIT	EVENT DESCRIPTION	DATE
MIXED WASTE STORAGE (GPRA UNIT)	RENEWAL - NO CHANGES - FINAL PERMIT RENEWAL (EXPIRES)	2/2/2025
	MOD CLASS 1 - NO PRIOR APPROVAL REQUIRED - PUBLIC NOTICE BY PERMITTEE	12/16/2015
MIXED WASTE STORAGE (GPRA UNIT)	RENEWAL - NO CHANGES - FINAL PERMIT RENEWAL (EFFECTIVE)	2/3/2015
MIXED WASTE STORAGE (GPRA UNIT)	RENEWAL - NO CHANGES - FINAL PERMIT RENEWAL	12/31/2014
MIXED WASTE STORAGE (GPRA UNIT)	RENEWAL - NO CHANGES - PUBLIC COMMENT (END)	11/7/2014
MIXED WASTE STORAGE (GPRA UNIT)	RENEWAL - NO CHANGES - PUBLIC COMMENT (PUBLIC HEARING)	10/30/2014
MIXED WASTE STORAGE (GPRA UNIT)	RENEWAL - NO CHANGES - PUBLIC COMMENT (PUBLIC MEETING)	10/30/2014
MIXED WASTE STORAGE (GPRA UNIT)	RENEWAL - NO CHANGES - PUBLIC COMMENT (BEGIN)	9/22/2014
MIXED WASTE STORAGE (GPRA UNIT)	RENEWAL - NO CHANGES - TECHNICAL COMPLETE LETTER	9/16/2014
MIXED WASTE STORAGE (GPRA UNIT)	RENEWAL - NO CHANGES - FINAL PART A & PART B RECEIVED	8/25/2014
MIXED WASTE STORAGE (GPRA UNIT)	RENEWAL - NO CHANGES - RESPONSE TO 1ST NOD RECEIVED	3/3/2014
MIXED WASTE STORAGE (GPRA UNIT)	RENEWAL - NO CHANGES - 1ST NOTICE OF DEFICIENCY ISSUED	1/16/2014
MIXED WASTE STORAGE (GPRA UNIT)	NEW OPERATING PERMIT - FINAL PERMIT (EXPIRES)	11/2/2008
MIXED WASTE STORAGE (GPRA UNIT)	RENEWAL - NO CHANGES - ADMINISTRATIVE REVIEW COMPLETE	1/28/2008
MIXED WASTE STORAGE (GPRA UNIT)	RENEWAL - NO CHANGES - APPLICATION PART B RECEIVED	12/20/2007
MIXED WASTE STORAGE (GPRA UNIT)	NEW OPERATING PERMIT - FINAL PERMIT (EFFECTIVE)	11/3/1998
MIXED WASTE STORAGE (GPRA UNIT)	NEW OPERATING PERMIT - FINAL PERMIT	9/29/1998
MIXED WASTE STORAGE (GPRA UNIT)	NEW OPERATING PERMIT - PUBLIC COMMENT (END)	5/28/1998
MIXED WASTE STORAGE (GPRA UNIT)	NEW OPERATING PERMIT - PUBLIC COMMENT (PUBLIC HEARING)	5/13/1998
MIXED WASTE STORAGE (GPRA UNIT)	NEW OPERATING PERMIT - DRAFT PERMIT	4/13/1998
MIXED WASTE STORAGE (GPRA UNIT)	NEW OPERATING PERMIT - PUBLIC COMMENT (BEGIN)	4/13/1998
MIXED WASTE STORAGE (GPRA UNIT)	NEW OPERATING PERMIT - FINAL PART A & PART B RECEIVED	4/8/1998
MIXED WASTE STORAGE (GPRA UNIT)	NEW OPERATING PERMIT - APPLICATION PART B RECEIVED	6/6/1997

Units Undergoing Closure - Completed Activities UNIT FILTER: All Units

NO PERMIT ACTIVITIES HAVE BEEN COMPLETED FOR THIS SITE

Historically Completed Cleanup Activities AREA FILTER: All Areas

NO CLEANUP ACTIVITIES HAVE BEEN COMPLETED FOR THIS SITE

NASNI Mixed Waste Facility: Inspection History

No violations in over 10 years.

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

ENVIROSTOR

NAVAL BASE CORONADO MIXED WASTE STORAGE FACILITY (CAR000019430)

SIGN UP FOR EMAIL ALERTS

NASNI BLDG 74
SAN DIEGO, CA 92135
SAN DIEGO COUNTY

MOST RECENT INSPECTOR:
CARLO RODRIGUEZ
MOST RECENT SUPERVISOR:
ALFREDO RIOS

INSPECTION TIMELINE

◆ = Class 1 Violation ◆ = Class 2 Violation ◆ = Minor Violation ◆ = Inspection - No Violations - Colored Circles = Financial Reviews

ENFORCEMENT ACTIONS

THERE ARE NO INSPECTION ENFORCEMENT ACTIVITIES FOR THIS SITE

COMPLETED INSPECTIONS

	ACTIVITY TYPE	INSP DATE	VIOLATION(S)	RETURN TO COMPLIANCE DATE
	Compliance Evaluation Inspection - Treatment, Storage and Disposal	6/18/2015	No Violations	
	Compliance Evaluation Inspection - Treatment, Storage and Disposal	6/24/2014	No Violations	
[VIEW DOCS]	Compliance Evaluation Inspection - Treatment, Storage and Disposal	6/11/2013	No Violations	
	Compliance Evaluation Inspection - Treatment, Storage and Disposal	6/28/2012	No Violations	
	Compliance Evaluation Inspection - Treatment, Storage and Disposal	6/23/2011	No Violations	
	Compliance Evaluation Inspection - Treatment, Storage and Disposal	6/9/2010	No Violations	
	Compliance Evaluation Inspection - Treatment, Storage and Disposal	4/22/2009	No Violations	
	Compliance Evaluation Inspection - Treatment, Storage and Disposal	1/31/2008	No Violations	
	Compliance Evaluation Inspection - Treatment, Storage and Disposal	4/11/2007	No Violations	
	Compliance Evaluation Inspection - Treatment, Storage and Disposal	6/29/2006	No Violations	
	Compliance Evaluation Inspection - Treatment, Storage and Disposal	3/29/2005	Minor	7/7/2006
	Compliance Evaluation Inspection - Treatment, Storage and Disposal	11/20/2003	No Violations	
	Compliance Evaluation Inspection - Treatment, Storage and Disposal	10/24/2002	Class 2	3/11/2003
	Compliance Evaluation Inspection - Treatment, Storage and Disposal	3/12/2002	Class 2	6/28/2002

Naval Air Weapons Station China Lake:
Permitted OBOD Facility set within 1 Million Acres

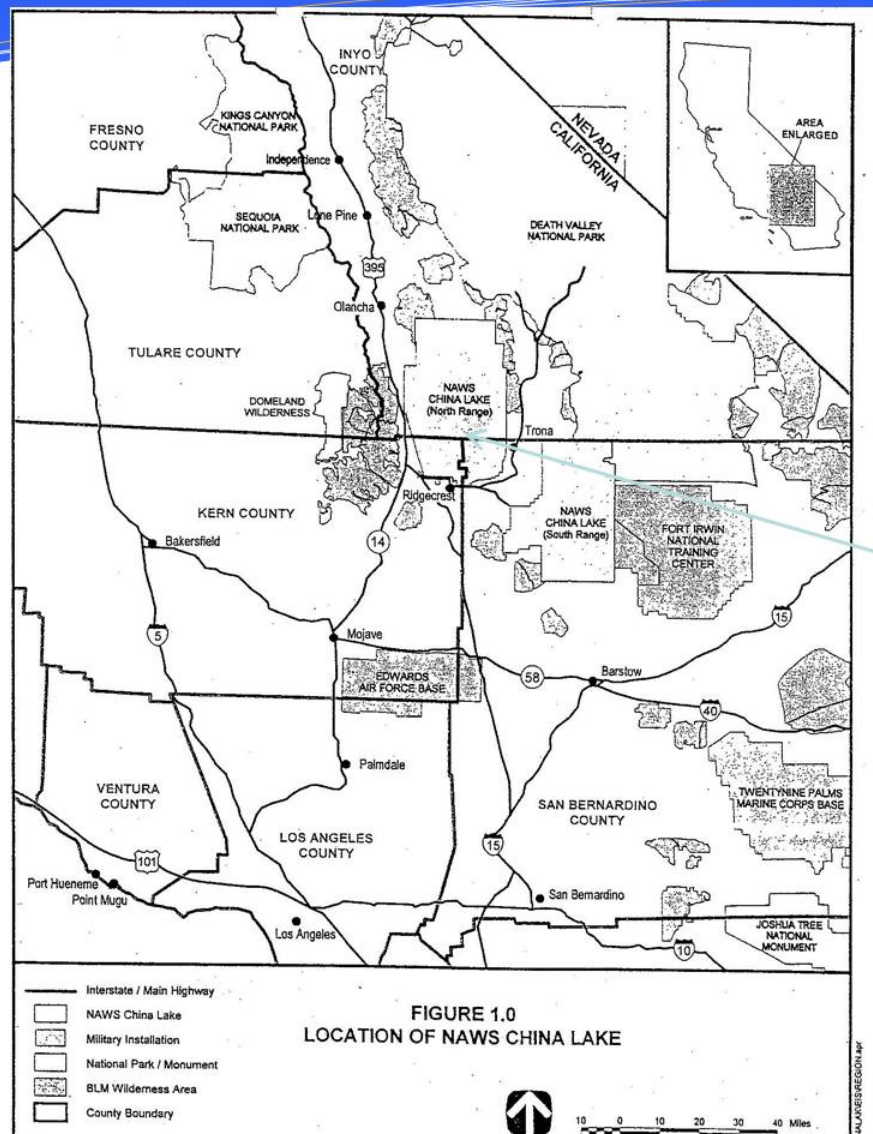


FIGURE 1.0
LOCATION OF NAWS CHINA LAKE

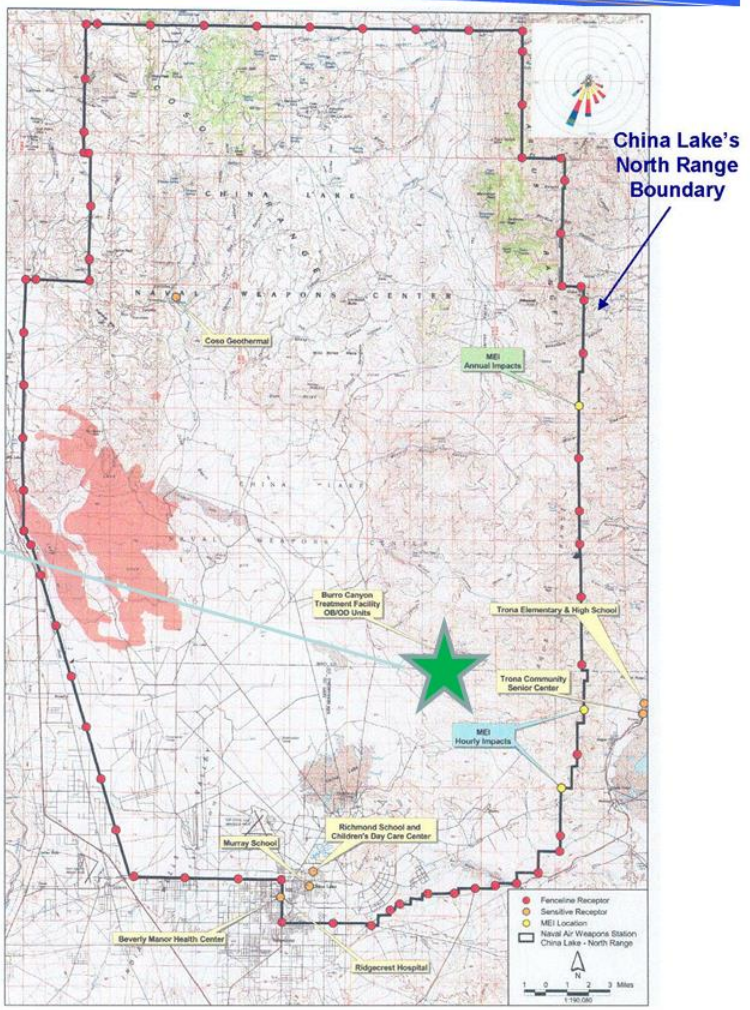


Figure 10.0 – Location of Human Receptors

NAWS China Lake Permit History

Permit Renewal Application Submitted Jan 2011

No NOD issued to date

CEQA completed Sept 2015

No action in last six months since CEQA compliance completed

Public hearing not yet scheduled

Recommend:
ALL Documents be hyperlinked

UNIT	EVENT DESCRIPTION	DATE
	MOD CLASS 1 - NO PRIOR APPROVAL REQUIRED - FINAL PERMIT MODIFICATION	10/12/2015
MULTIPLE UNITS	RENEWAL - NO CHANGES - CEQA DETERMINATION	9/7/2015
	MOD CLASS 1 - NO PRIOR APPROVAL REQUIRED - MAILING LIST	8/31/2015
	MOD CLASS 1 - NO PRIOR APPROVAL REQUIRED - PUBLIC NOTICE BY PERMITTEE	8/20/2015
MULTIPLE UNITS	RENEWAL - NO CHANGES - FINAL CEQA	7/29/2015
	MOD CLASS 1 - NO PRIOR APPROVAL REQUIRED - FINAL PERMIT MODIFICATION (EFFECTIVE)	2/25/2015
MULTIPLE UNITS	RENEWAL - NO CHANGES - DRAFT CEQA	1/16/2015
MULTIPLE UNITS	MOD CLASS 3 - 2 OR MORE UNITS - FINAL PERMIT MODIFICATION (EXPIRES)	8/7/2011
MULTIPLE UNITS	RENEWAL - WITH CHANGES - FINAL PERMIT RENEWAL (EXPIRES)	8/7/2011
MULTIPLE UNITS	MOD CLASS 1* - PRIOR APPROVAL REQUIRED - FINAL PERMIT MODIFICATION (EXPIRES)	8/7/2011
	MOD CLASS 1 - NO PRIOR APPROVAL REQUIRED - FINAL PERMIT MODIFICATION (EXPIRES)	8/7/2011
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - FINAL PERMIT MODIFICATION (EXPIRES)	8/7/2011
MULTIPLE UNITS	RENEWAL - NO CHANGES - ADMINISTRATIVE REVIEW COMPLETE	3/1/2011
MULTIPLE UNITS	RENEWAL - NO CHANGES - APPLICATION PART A RECEIVED	1/27/2011
MULTIPLE UNITS	RENEWAL - NO CHANGES - APPLICATION PART B RECEIVED	1/27/2011
MULTIPLE UNITS	MOD CLASS 1* - PRIOR APPROVAL REQUIRED - FINAL PERMIT MODIFICATION (EFFECTIVE)	11/16/2010
MULTIPLE UNITS	MOD CLASS 1* - PRIOR APPROVAL REQUIRED - FINAL PERMIT MODIFICATION	11/16/2010
MULTIPLE UNITS	MOD CLASS 1* - PRIOR APPROVAL REQUIRED - PUBLIC NOTICE BY PERMITTEE	10/25/2010
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - FINAL PERMIT MODIFICATION	8/11/2010
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - FINAL PERMIT MODIFICATION (EFFECTIVE)	8/11/2010
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - CEQA DETERMINATION	7/6/2010
MULTIPLE UNITS	RENEWAL - NO CHANGES - CALL-IN LETTER ISSUED	1/25/2010
MULTIPLE UNITS	MOD CLASS 3 - 2 OR MORE UNITS - FINAL PERMIT MODIFICATION (EFFECTIVE)	8/4/2008
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - ADMINISTRATIVE REVIEW COMPLETE	7/9/2008
MULTIPLE UNITS	MOD CLASS 3 - 2 OR MORE UNITS - FINAL PERMIT MODIFICATION	6/30/2008
MULTIPLE UNITS	MOD CLASS 3 - 2 OR MORE UNITS - FINAL CEQA	6/23/2008
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - PUBLIC COMMENT (END)	5/8/2008
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - PUBLIC COMMENT (PUBLIC MEETING)	4/9/2008
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - PUBLIC NOTICE BY PERMITTEE	4/8/2008
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - PUBLIC COMMENT (BEGIN)	4/6/2008
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - APPLICATION PART A RECEIVED	3/20/2008
MULTIPLE UNITS	MOD CLASS 3 - 2 OR MORE UNITS - PUBLIC COMMENT (END)	2/15/2008
MULTIPLE UNITS	MOD CLASS 3 - 2 OR MORE UNITS - PUBLIC COMMENT (BEGIN)	12/18/2007
MULTIPLE UNITS	MOD CLASS 3 - 2 OR MORE UNITS - DRAFT PERMIT MODIFICATION	12/18/2007
EPOBOD	EMERGENCY PERMIT - FINAL PERMIT (EXPIRES)	3/2/2007
EPOBOD	EMERGENCY PERMIT - FINAL PERMIT	2/20/2007
EPOBOD	EMERGENCY PERMIT - FINAL PERMIT (EFFECTIVE)	2/20/2007
MULTIPLE UNITS	MOD CLASS 1 - NO PRIOR APPROVAL REQUIRED - FINAL PERMIT MODIFICATION	12/21/2006
MULTIPLE UNITS	MOD CLASS 1 - NO PRIOR APPROVAL REQUIRED - FINAL PERMIT MODIFICATION	1/26/2004
MULTIPLE UNITS	MOD CLASS 1 - NO PRIOR APPROVAL REQUIRED - FINAL PERMIT MODIFICATION (EFFECTIVE)	12/1/2003
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - FINAL PERMIT MODIFICATION	7/7/2003
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - 2ND NOTICE OF DEFICIENCY ISSUED	4/14/2003
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - 1ST NOTICE OF DEFICIENCY ISSUED	12/26/2002
MULTIPLE UNITS	MOD CLASS 1* - PRIOR APPROVAL REQUIRED - FINAL PERMIT MODIFICATION	11/6/2002
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - ADMINISTRATIVE REVIEW COMPLETE	5/21/2002
MULTIPLE UNITS	MOD CLASS 1* - PRIOR APPROVAL REQUIRED - FINAL PERMIT MODIFICATION	5/9/2002
MULTIPLE UNITS	MOD CLASS 2 - 1 OR LESS UNITS - APPLICATION PART B RECEIVED	4/24/2002
MULTIPLE UNITS	MOD CLASS 1* - PRIOR APPROVAL REQUIRED - FINAL PERMIT MODIFICATION	3/1/2002
MULTIPLE UNITS	RENEWAL - WITH CHANGES - FINAL PERMIT RENEWAL (EFFECTIVE)	8/8/2001
MULTIPLE UNITS	RENEWAL - WITH CHANGES - FINAL PERMIT RENEWAL	6/30/2001
MULTIPLE UNITS	RENEWAL - WITH CHANGES - FINAL PERMIT RENEWAL (EXPIRES)	6/10/2001
TANKSTR1	MOD CLASS 2 - 1 OR LESS UNITS - FINAL PERMIT MODIFICATION (EXPIRES)	6/10/2001

Conclusion

- DoD agrees process needs reform & improvement.
- DTSC could improve transparency for the process by populating EnviroStor with all documents (agency and respondent).
  - Public deserves to see an applicant's response
  - Would help explain "blank" spots on timelines
- DTSC should account for delays.
  - Greater emphasis needed on timelines and procedures.
  - Procedural delays add up in this multistep process