Proposed Permit Renewal for Mixed Waste Storage Facility at Naval Base Coronado – Coronado, CA

The California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) invites you to review and comment on the Resource Conservation and Recovery Act (RCRA) hazardous waste facility permit renewal proposed for the Mixed Waste Storage Facility (MWSF) at the Naval Base Coronado (formerly known as Naval Air Station – North Island (NANSI)), Coronado. The facility currently stores mixed waste which contains a chemically hazardous waste component and a low-level radioactive component.

The Hazardous Waste Facility permit renewal, if approved, will allow the United States Department of the Navy and the Puget Sound Naval Shipyard (PSNS) to continue to store up to a maximum of 5,500 gallons of mixed waste at the facility. PSNS has been operating this facility since 2001. There will be no change to the facility’s operation or storage capacity.

This fact sheet provides information on:
- The facility location and operations
- The proposed permit conditions
- DTSC’s permit and
- California Environmental Quality Act (CEQA) Compliance

Public Comment Period

September 22 - November 7, 2014

A 45-day public comment period is being held to receive public comments on the Draft Permit. All public comments must be post-marked or e-mailed by November 7, 2014, and sent to:

Alfred Wong
DTSC Project Manager
700 Heinz Avenue
Berkeley, California 94710
awong@dtsc.ca.gov
510-540-3946

Public Meeting/Hearing Announcement

DTSC will host a public meeting/hearing to receive public comments and answer any questions you may have on the Draft Permit. The public meeting will be held on October 30, 2014 at 6:30 pm at the Coronado Public Library at 640 Orange Ave. in Coronado.

Please join us to learn more about this project in your community.
FACILITY LOCATION

Naval Base Coronado is located in the City of Coronado and occupies approximately 2,800 acres of the Silver Strand peninsula at the entrance to the San Diego Bay. The Depot Maintenance Facility (DMF) is located at the northeastern corner of Naval Base Coronado. The MWSF will be located within the DMF.

FACILITY DESCRIPTION

The MWSF consists of one building within the DMF. The building is an enclosed concrete masonry and steel truss structure (measuring 42 feet by 54 feet) and a loading/unloading area covered in concrete and asphalt (measuring 54 feet by 20 feet). The roof of the building is constructed of metal standing seam roofing, rigid roof insulation, steel roof deck, and steel joists. The building has exterior personnel doors, which are painted, insulated, steel doors with steel frames; and a rolltop door, which is chain and motor operated.

The inside perimeter of the building is fitted with a 10-inch concrete berm to prevent any spills from leaving the MWSF. This berm provides approximately 12,754 gallons of secondary containment. The floor of the storage area slopes inward from the berms toward a blind floor sump at a 1% grade. Any spills or leaks flow by gravity to the floor sump. The sump has no drain. If liquids drain to the sump, the collected liquid is removed using a portable pump or absorbent and placed into approved containers, then characterized and handled as mixed waste if necessary. The entrances are protected by concrete ramps and/or platforms with adjoining steps.

The floor of the MWSF consists of a 8.5-inch thick concrete slab on grade which is covered with impervious epoxy coating. The slab is reinforced with 0.75 inch diameter rebar on 6 inch center in two directions to prevent crack opening or movement, and underlain by a 2-inch layer of sand and a 4-mil polyethylene vapor barrier sheet.

FACILITY OPERATIONS

The MWSF stores containers of solid and/or liquid mixed wastes. Sealed containers of mixed waste are brought to the MWSF for storage until arrangements can be made to ship the mixed waste to an authorized offsite treatment or disposal facility. Mixed waste is generated either onsite at the DMF, or from ships docket at Naval Base Coronado, or at the maintenance facility at Naval Base Point Loma.

Solid mixed waste is contained at the point of generation in sealed heavy-duty plastic bags, chip collectors or vacuum canisters. Liquid mixed waste is contained at the point of generation in sealed rigid containers. Solid and liquid wastes are packed into excepted package, general design package, or United Nations certified Department of Transportation shipping containers (e.g. metal drums, metal/fire-resistant wood waste boxes, etc.) and transported to MWSF for storage.

All outer containers in the MWSF are kept closed except when consolidating compatible wastes into partially filled containers or performing surveillances for radiation to ensure the inner bags have not been compromised.

PERMIT DETERMINATION PROCESS

Facilities that treat, store or dispose of hazardous waste are required to obtain a permit from DTSC. Once an application is received, DTSC conducts a comprehensive technical review of the permit application. Once the review is completed, DTSC makes a proposed permit determination that either prepares a draft hazardous waste facility permit (as in this case), or proposes a permit denial. DTSC issues a public notice discussing the proposed permit decision and requests comment from the public and key stakeholders. Comments made by the public, applicant, and government agencies are considered in making DTSC’s final permit determination.
MWSF PERMITTING HISTORY

DTSC issued a hazardous waste facility permit to the United States Department of the Navy, Puget Sound Naval Shipyard and Intermediate Maintenance Facility (PSNS & IMF) to construct and operate the MWSF at NASNI (now known as Naval Base Coronado) on September 29, 1998, which was appealed. The permit decision was stayed and on December 8, 1998, DTSC rescinded the stay of the permit decision. The permit has an expiration date of November 2, 2008. Construction of the MWSF was completed in April 2000. Mixed waste operations started in June 2001.

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 allows PSNS & IMF to continue to operate under the terms of the 1998 permit until DTSC makes a final decision on PSNS & IMF's application. DTSC has conducted a comprehensive review of the MWSF application to renew the permit and found it to be complete.

ENFORCEMENT HISTORY

DTSC inspects the MWSF annually and has found no violations in the past eight years.

DRAFT PERMIT AND PROPOSED PERMIT CONDITIONS

A Permit is used to protect public health and the environment, therefore DTSC routinely adds conditions to proposed permits to address the uniqueness of the project. The following summarizes some special conditions in draft Permit.

Safe Storage of Mixed Waste: The containers cannot be handled or stored in a way which could cause them to leak. The containers must be properly labeled and must not be used for wastes which might react with the container.

The MWSF is not allowed to stack containers more than 2 high, and no containers storing liquid waste is allowed to be stacked.

Storage Limitations: The aggregate volume of waste stored may not be greater than 5,500 gallons at any given time.

The MWSF is not allowed to accept any reactive waste and can only accept no more than 5 gallons of ignitable waste.

Contingency Plan: This Plan specifies procedures that must be followed during an emergency and contains response procedures designed to protect human health and the environment. The plan is implemented by the person who discovers the emergency. He/she notifies the on-base Emergency Coordinator and initiates the appropriate emergency procedures. In addition to notifying the Emergency Coordinator, the initial response actions may include evacuating the scene of the incident or combating the incident with materials and equipment on-hand. Although not part of the Contingency Plan, it is important to note that the Federal Fire Department maintains a Mutual Aid Agreement for reciprocal firefighting assistance with the cities of Coronado and San Diego Fire Departments.

After an incident, a report must be submitted to the Coronado City Manager in addition to DTSC.

Training: Personnel must have hazardous waste management and safety training. Those personnel who handle mixed waste at the MWSF must complete a program of classroom instruction and on the job training in order to prepare them to inspect, maintain, and operate the MWSF in a safe manner. Personnel are also trained in how to recognize hazards and in self-protection during emergencies. Only those personnel that have completed the training are allowed to handle and conduct hazardous waste operations.

Secondary Containment: The MWSF is required to have adequate secondary containment capacity in case of a leak or spill. Secondary containment is used to prevent any wastes from leaving the MWSF. Any defects in the secondary containment system must be reported to DTSC with 24 hours and the defect promptly repaired.
Acceptance Limitations: The MWSF is only allowed to accept mixed waste generated from the DMF, the ships docked at Naval Base Coronado, and from the Naval Base at Point Loma.

Transportation: All transportation of all mixed wastes in and out of the MWSF must not be conducted during peak hours (7:00-8:00 am and 4:00-5:00 pm). Additionally, the transporter must follow the prescribed routes in the Coronado City Council Resolution No. 8264.

CEQA PROCESS
DTSC prepared a “Mitigated Negative Declaration (April 1998) for Permit Determination for the Mixed Waste Storage Facility at Naval Air Station-North Island” (1998 Mitigated Negative Declaration). In accordance with the requirements of Public Resources Code section 21000 et seq. and the CEQA Guidelines, California Code of Regulations, title 14, DTSC determined that the 1998 Mitigated Negative Declaration provided an accurate description of proposed project activities, current baseline environmental conditions, and an analysis of potential impacts; and therefore, no additional CEQA documentation is necessary for this permit determination.

CORRECTIVE ACTION
In order to avoid duplication of efforts by having two organizations within the United States Department of the Navy cleaning up the same site, corrective action for this permit is incorporated into the corrective action program being carried out under the Hazardous Waste Facility Permit issued to the United States Navy Hazardous Waste Facility Complex (HWFC) on July 25, 2010 and pursuant to the Federal Facility Site Remediation Agreement (“FFSRA”), signed by DTSC on January 3, 1999. Should the HWCF permit be terminated for any reason, the MWSF permit will be modified to include corrective action provisions.

During the original permitting process, PSNS conducted an analysis to determine the risk of additional cancer associated with exposure to the radioactive component of the mixed waste due to an accidental release agencies assume to be significant.

The analysis concluded that the excess cancer risk is less than one in one-hundred million (about 100 times less than the level regulatory

OPPORTUNITIES FOR PUBLIC INVOLVEMENT
DTSC encourages the public to become involved in the MWSF permit decision process. The public meeting and hearing will provide you with the opportunity to hear presentations and submit your comments to DTSC. The public comment period for submitting written comments to DTSC begins on September 22, 2014 and ends on November 7, 2014.

Key documents, including the Permit Application, are available for review and copying at the locations listed below:

Coronado Public Library
640 Orange Avenue
Coronado, CA 92118
(619) 522-7390

The administrative record for the MWSF permit renewal project is located at DTSC’s Berkeley Regional office at 700 Heinz Avenue in Berkeley, California. Please contact DTSC’s file room at 510-540-3800 for assistance.

Envirostor Website:

At the close of the comment period, DTSC will consider all comments received and make a final decision. A written response to all comments received will become part of the administrative record. The Response to Comments document will be forwarded to everyone who submits comments.

A notice of the final decision will be mailed to the applicant and to each person who has submitted written and oral comments or requested notice of the final permit determination. The information repositories will contain a record of DTSC’s final permit decision, all comments received and DTSC’s Responses to Comments.
If you did not receive this fact sheet in the mail and would like to receive future mailings regarding the MWSF, please complete and return this coupon to the address listed below. If you wish to submit comments and/or questions regarding the Draft Permit, please state them below or on a separate piece of paper. To be added to the MWSF’s mailing list, please check the box. ☐

Mr. Alfred Wong, Office of Permitting, Department of Toxic Substances Control, 700 Heinz Avenue, Berkeley, California 94710.

NAME:________________________________________________________

AFFILIATION:__________________________________________________

STREET:________________________________________________________

CITY:_________________________ STATE:_______ ZIP:____________

COMMENTS: