

NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
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Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
Hazardous Waste Permitting Teams
9211 Oakdale Avenue
Chatsworth, California 91311

Project Title: Permit Renewal for the North Island Hazardous Waste Facility Complex at Naval Air Station North Island.

Project Location: Naval Air Station North Island, Coronado/San Diego, California.

County: San Diego.

Project Description:

The Department of Toxic Substances Control (DTSC) is proposing to approve a hazardous waste facility permit renewal for the hazardous waste storage and treatment activities at Naval Air Station North Island.

Naval Air Station North Island (Facility) is an active military facility located in San Diego County, southwest of the City of San Diego on the tip of the Silver Strand Peninsula. It is bounded by the City of Coronado to the east, the Pacific Ocean on the south, San Diego Bay on the north and inlet of San Diego Bay on the west (latitude: 32E 42.06"N/longitude: 117E 12.10'W).

A hazardous waste facility permit was issued by the Department of Toxic Substances Control (DTSC) in 1998 to treat and store hazardous wastes generated on-site and off-site. All hazardous waste permitted treatment and storage units are located within an area known as the Hazardous Waste Facility (HWF) Complex, which is located at the center of the base.

From 1998 to 2007, the Facility submitted six permit modifications to modify its storage activities and treatment system. These modifications include (1) the replacement and relocation of the oily waste pipelines, (2) construction of a roof to a storage unit, (3) installation of backup tanks for a treatment system, (4) change in the ownership, operator and name of the treatment complex, (5) conditions to allow the storage of tank maintenance waste and (6) administrative changes to revise the permit and Part B Application. Several modifications were made to this permit. The hazardous waste facility permit expired on January 4, 2008, and the Navy submitted a permit application to renew its hazardous waste storage and treatment activities without substantial changes.

The project is to renew a hazardous waste facility permit to continue the operation of five (5) container storage units and two (2) treatment systems at Naval Air Station North Island. The Facility stores and treats on-site and off-site waste collected mainly from the military facilities in the San Diego region. The Facility is proposing some changes to its operations including the storage capacity of each storage units, closure plan and loading and unloading operations to conform the regulations. The maximum treatment capacities for two treatment systems (Industrial Waste Treatment Plant and Oil Recovery Plant) and the total storage capacity for the HWF Complex (combined storage capacity of five storage units) are not increased.

The wastes are stored in containers and roll off bins. An aisle space of 30 inches is required between two rows of containers. All container units are equipped with secondary containment (coated with an impermeable layer) to prevent the releases to the environment. All containers are closed during the storage, except when waste is being sampled or consolidated.

There are two treatment systems (Industrial Waste Treatment Plant and Oil Recovery Plant) which treat industrial waste contaminated with metals, cyanide, organic compounds, semi-organic compounds and oily wastes. These wastes are delivered by trucks or pipeline to the treatment systems. All treatment tanks including their associated equipment and pipelines are secondarily contained. The treated effluents are discharged to the sewer in accordance with the requirements specified in the discharge permits. The treatment systems are equipped with air polluting control devices which are permitted by the Air Pollution Control District. The Facility is not proposing to increase the treatment capacity.

The Facility also operates five container storage units. The Facility is proposing to change the storage capacity of each storage capacity due to the secondary containment capacity; however, the total permitted storage capacity for the entire HWF Complex (five storage units) is not changed.

Waste loading and unloading are conducted within designated areas that are equipped with secondary containment.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: Naval Air Station North Island

Exemption Status: (check one)

- Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
- Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec.15269(a)]
- Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec.15269(b)(c)]
- Categorical Exemption: [State type and section number]
- Statutory Exemptions: [State code section number]
- General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: With certainty, no possibility of significant environmental effect

Reasons Why Project is Exempt:

1. The project is for renewal of an existing hazardous waste facility permit. NASNI is proposing some changes to its operation including: (1) modify the storage capacity of each storage units, but the total storage capacity of the five permitted container storage units remain unchanged; (2) revise the closure plan to conform the regulation and DTSC's guidance document, and (3) designate loading and unloading operations at specific areas to meet the secondary containment requirements. These changes will not result in significant changes to existing environmental conditions.
2. There is no increase in the total treatment or storage capacities for the five permitted storage units located within HWF Complex in the permit renewal. Impact to the existing noise level and truck traffic associated with the storage capacity is not expected to occur.
3. All hazardous waste management units are equipped with secondary containment. Releases or spills from containers or tank systems, if occur, will be contained inside the secondary

containment and collected to a container for storage or to a tank for onsite treatment . Collected storm water is also sampled prior to its discharge. If collected storm water is determined to be contaminated, it is treated onsite to meet the sewer discharge requirements.

4. NASNI provides natural habitats to many listed plant and animal species; however, the vegetation found in the immediate proximity to the complex are planted as part of ornamental landscaping, animal transported, and/or wind blown species. Ornamental landscaping is limited to grass and trees planted in the vicinity of administrative buildings, along aircraft blast fences, base housing quarters and similar sites. Sensitive species are not found in the HWF Complex. A golf course is located in the southeast corner of the island to provide a buffer between the military facility and the local community of Coronado. The closest natural habitats found near the HWF Complex is the California Least Tern nesting area which is located 600 feet northwest of the complex. The terns feed off marine organisms and nest in open soft sand area where predators can be seen. Given that the nesting area is separated from the facility by a public road and an active runway, no impact to the nesting area is anticipated.
5. NASNI contains an officially designated historic district; however, it is located approximately 2400 feet to the north of the complex at its closest point. The Naval Air Station San Diego Historic District was listed in the National register of Historic Places (NRHP) in May 1991. A total of 82 buildings and structures were identified as possessing historical and architectural characteristics, making them potentially eligible for inclusion in the NRHP. None of these buildings are structures located near the HWF Complex and will not be impacted.
6. The HWF Complex is located in the Air Installation Compatible Use Zone (AICUZ) I-3, which is a high aircraft noise zone with a community noise equivalent level (CNEL) of 75. The CNEL provides a measure of community noise exposure from aircraft operations in a specific period, typically 24 hours. The operation of the hazardous waste treatment and storage activities will not increase the background noise levels.
7. The treatment systems are operating according to the air permits issued by the Air Pollution Control District. The operating systems were reviewed by the San Diego Air Pollution Control District, which concluded that the emissions from the systems were “de minimus.” No odors are generated by the treatment and storage activities either.
8. The HWF Complex is an existing location approximately at the center of the base, in a fully developed industrial area, surrounded by other industrial buildings and a paved flight line. There is no new construction that will affect the aesthetics of the area. There is no construction proposed for this project.
9. The HWF Complex is located within the Rose Canyon Fault zone. The closest active fault is the Spanish Bight Fault which is located approximately 1,800 feet east of the HWF Complex. The maximum Creditable Earthquake is a magnitude 7 event on the Rose Canyon Fault zone and the Peak Horizontal Acceleration expected is 0.6g. All treatment systems and container storage units and their associated structures are designed to meet the seismic requirements which were evaluated by the independent third-party professional engineering certifications.
10. The HWF Complex is not located within a 100-year floodplain.
11. The closest off-base public roadway to the HWF Complex is approximately 4,000 feet to the southeast. No increase in the associated traffic will result because there is no net increase in the total hazardous waste treatment and storage capacity.

12. The permit does not require corrective action for violations detected at the permitted units. Recent inspections have noted no major violations. Minor violations regarding the recordkeeping were found in the March 2008 inspection.

Based on the nature of the project, the proper management of hazardous waste, and the fact that there will be no changes to existing operations, there is no possibility that a significant effect on the environment will occur.

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