Department of Toxic Substances Control

Maureen F. Gorsen, Director
1011 North Grandview Avenue
Glendale, California 91201

Linda S. Adams
Secretary for
Environmental Protection

Arnold Schwarzenegger
Governor

RECORD OF DECISION
FOR
CLASS 1 AND CLASS 2 PERMIT MODIFICATION REQUESTS FOR
NAVAL AIR STATION NORTH ISLAND
CORONADO/SAN DIEGO, SAN DIEGO
EPA ID NO. CA717 009 0016

INTRODUCTION

On June 1, 2007, the Shaw Infrastructure, Inc. submitted a Class 1 Permit Modification Request for the Naval Air Station North Island (NASNI), Hazardous Waste Facility Complex. The purpose of the request is to change the emergency coordinators list and update the notification procedures, locations of the emergency equipment and figures in the Contingency Plans in the Part B Permit Application.

On February 27, 2006, the Commander Naval Region Southwest (CNRSW) submitted a Class 2 Permit Modification Request to DTSC. The purpose of the Class 2 permit modification is
to modify the following areas identified in the permit and the Part B Permit Application:

1) Secondary containment for the Industrial Waste (IW) Filter Press Area, the Oily Waste (OW) Filter Press Area, the North Loading and Offloading Area and the South Offloading Area;

2) Operations at the IW and OW Filter Press Areas to allow the placement of a roll-off bin under each filter press; and

3) Operations at the IW/OW Container Storage Unit to allow the storage of maintenance-related waste during the tank maintenance period.

In accordance with the California Code of Regulations, title 22, section 66270.42, the Navy sent a public notice of the proposed Class 2 Permit Modification Request to all persons on the facility's mailing list and the relevant appropriate entities of State and local government on March 6, 2006. The public notice comment period was from March 20 to May 19, 2006. A public meeting was held on April 26, 2006 at the Coronado Public Library from 6 to 8 p.m. The public notice was also published at the Coronado Eagle & Journal, the San Diego Union Tribune and The Daily Transcript Newspapers.

DTSC did not receive any comments regarding the Class 2 permit modification request. DTSC reviewed the Class 2 permit modification request, dated February 27, 2006, and concurs that the changes qualify as a Class 2 Permit Modification.

DTSC also reviewed the Class 1 permit modification request, dated June 1, 2007, and concurs that the changes qualify as a Class 1 Permit Modification.

CHANGES MADE TO JUNE 28, 2006 PERMIT

The following are the changes made to the June 28, 2006 permit:

1. June 28, 2006 Permit, Page 6- First complete paragraph, Third sentence was revised to:

   The first treatment consists of raising the pH to at least 10.0 with the addition of caustic and mixing oxidizers at concentrations proportional to cyanide concentrations.

2. June 28, 2006 Permit, Page 9 - Third Paragraph was revised as follows:

   Sludges produced by the various treatment processes at the IWTP-2 are routed to the filter press system for dewatering prior to disposal. Sludge is either accumulated in the clarifier and pumped to the filter press system, or it is pumped manually from the batch treatment tanks to the filter press system. The filter press system is comprised of a storage tank (T-34), two day tanks, a filter press, a secondary containments system, and accumulation containers. The dewatered sludge from the filter press is stored in a ~~container~~ 14.2 cubic yard roll-off bin under the filter press. The roll-off bin, once filled, is moved to a container storage unit known as the Industrial Waste/Oily Waste (IW/OW) Container Storage Area located behind Building 788 for storage prior to ~~disposal~~ its transport to an offsite treatment, storage and disposal facility. The filtrate is either accumulated in a day tank and transported to a batch treatment tank or it flows to the LET system.

2. June 28, 2006 Permit, Page 11 - Third Complete Paragraph was revised as follows:

   From the scum surge tank (T-26), the scum is pumped to the scum storage tank (also known as sludge pretreatment tank). When a sufficient amount of scum has accumulated, the scum is discharged to the rotary drum vacuum filter system for dewatering or a filter press. The rotary drum/ filter press system consists of a 2,300 gallon day tank with mixer, a rotary drum, a filter press, and a diatomaceous earth application system. The dewatered sludge cake from the

filter is accumulated in a 14.2 cubic yard roll-off bin under the filter press. The roll-off bin, once filled, is moved to ~~covered container adjacent to the process prior to disposal (the storage area is known as the Industrial Waste/Oily Waste~~ the ~~(~~IW/OW~~)~~ Container Storage Area located behind Building 788, and the filtrate is pumped back to the ORP/IW LET for treatment.

3 June 28, 2006 Permit, Pages 15 and 16 - Section I.B.2.c, is revised as follows:

The IW/OW Container Storage Area is located behind Building 788. It is used to store filter cake from the dewatering system units at the IWTP and the ORP. Liquid or solid sludges generated during tank cleanings/maintenance at the IWTP and ORP can also be stored at this unit after a notification to DTSC. The IW and OW maintenance-related wastes include granulated activated carbons, mixed media, media packs (coalescing filters), sandblasting/coating waste, filter cloths and non-pumpable tank bottoms.

4 June 28, 2006 Permit, Page 38 - Section III.C is added as follows:

The maximum amount of hazardous waste that may be stored at IW/OW Container Storage Unit at any given time during normal operations shall not exceed a total of two 14.2-cubic-yard covered roll off bins. The maximum quantity of hazardous waste that may be stored at the IW/OW Container Storage Unit at any given time during the tank maintenance and repair activities shall not exceed a total of (A) four 20-cubic-yard roll off bins and two 20,000-gallon-portable tanks, OR (B) six 20-cubic-yard-roll-off bins. Table IW/OW-2 shows the maximum storage capacity during normal operation and maintenance and repair activities.

5 June 28, 2006 Permit, Page 40, Table CST-1-2 – The total storage capacity was changed from 832 55-gallons or 45,756 gallons to 720 55-gallon drums or 39,600 gallons.

6 June 28, 2006 Permit, Page 41, Table CST-1-2 –The storage capacity for toxic wastes was changed from 480 55-gallon drums to 368 55-gallon drums.

7 June 28, 2006 Permit, Page 41 – Section III.F.1.f is revised as follows:

The IW/OW Container Unit is designated to store filter cake generated from the filter press systems from IWTP/OWTP as well as maintenance-related waste. During normal operations, only filter cake generated from the IWTP/ORP filter presses shall be stored at this unit. During the IWTP/ORP tank maintenance and repair period, the Permittee may store the tank maintenance related waste at this unit for ninety days or less after notification to DTSC regarding the maintenance

activities. The Table IW/OW-2 shows the proposed maximum storage capacity during the normal operation and maintenance and repair activities.

8 June 28, 2006 Permit, Page 41 – Section III.F.1.g is added as follows:
During the tank maintenance and repair activities, the tanks from which the maintenance-related waste originated will not be placed back into service until after the maintenance related hazardous waste stored at the IW/OW Container Storage Unit is sent offsite for disposal or the maintenance related waste is placed back into the IWTP/ORP tanks for further treatment.

9 June 28, 2006 Permit, Page 41 – Table IW/OW-2, Storage Requirements at IW/OW Container Storage Unit, is revised as follows:

IW/OW Container Storage Unit		
Normal Operation	Container types	14.2 cubic yard (2,900 gallon) covered roll off bins with liners
	Waste Codes	See Table IW/OW-1
	Delivery	Wastes are generated by IWTP and ORP filter presses
	Total Maximum Storage Capacity	two 14.2- cubic-yard covered roll off bins
Maintenance Operation	Container Types	Up to 20 cubic-yard-roll off bins which are covered and lined with polyethylene Up to 20,000 gallon portable tanks
	Waste Codes	See Table IW/OW-1

	Delivery	Wastes are generated by IWTP and ORP maintenance activities
	Total Maximum Storage Capacity	(A) Four 20-cubic-yard roll off bins and two 20,000-gallon-portable tanks, OR (B) six 20-cubic-yard-roll-off bins

10 June 28, 2006 Permit, Page 69 – Table IWTP -2-2 – First row is revised as follows:

Dual-Media Filters (3 units) *(These filters do not handle hazardous waste, but ~~is~~ are part of IWTP-2)*

11 June 28, 2006 Permit, Page 71 – Table IWTP-2-2 - First row is revised as follows:

Carbon Adsorbers (4 units) *(These adsorbers do not handle hazardous waste, but ~~is~~ are part of IWTP-2)*

12 June 28, 2006 Permit, Page 107 - Section IIII is revised as follows:

The owner and/or operator may continue ninety-day hazardous waste accumulation activities within the fence lines of the ~~PWC~~ Hazardous Waste Treatment Complex subject…

13 June 28, 2006 Permit, Page 115- Item 5, Section 1.B.1.a is revised as follows:

The Ultraviol~~a~~et system…

14 June 28, 2006 Permit, Page 116 – Permit Modification History for June 7, 2007 Class 1 and Class 2 Permit Modification is added.